CALIFORNIA COASTAL COMMISSION

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LCP-1-DNC-21-0053-1 (County of Del Norte) March 8, 2023

CORRESPONDENCE



March 3, 2023

California Coastal Commission 455 Market Street Suite 300 San Francisco, CA 94105 (415) 904-5202 Donne.Brownsey@coastal.ca.gov

RE: County of Del Norte LCP Amendment No. LCP-1-DNC-21-0053-1 (Crescent City Harbor Plan Update)

Honorable Chair Brownsey and members of the Coastal Commission,

Smart Coast California (SCCa) is grateful for the opportunity to submit our comments regarding the: County of Del Norte LCP Amendment No. LCP-1-DNC-21-0053-1 (Crescent City Harbor Plan Update) as the Coastal Commission considers this plan for certification. SCCa is a 501(c)3 organization established in 2019 to promote and advocate for smart land use policies affecting California's 1,271 miles of coastline. Smart Coast California is dedicated to community sustainability, property rights and the environment.

SCCa supports the Coastal Commission staff recommendation to certify the Crescent City Harbor Port Land Use Plan as submitted. We understand that the basis of this Local Coastal Plan Amendment addresses the transition from resource production to a tourism and recreation services-based economy. SCCa appreciates that the plan acknowledges that the Crescent City Harbor is the only protected boating facility in Del Norte County and includes policies which accommodate future commercial fishing industry needs, should trends reverse.

Some additional key points Smart Coast California would like to emphasize are Section 2.5.1-3 Sea Level Rise which requires that the best available scientific information regarding the effect of sea level rise be considered, and in particular, the segment of Section 2.5.1-3 which addresses a tiered response found on Page 20 of Exhibit 5:

"In certain cases, it may be appropriate to implement siting and design adaptations overtime, initially siting and designing for lower projections while identifying a plan to address vulnerabilities from higher projections if and when necessary."

SCCa also supportive of the goals and policies of the proposed LUP which allow for future repair, maintenance and enhancement of critical infrastructure that protect coastal dependent uses and that those be the least environmentally damaging feasible alternatives,

Goal 2.5.1-2 Repair, maintain and enhance where necessary critical structures such as revetments, breakwaters, groins, seawalls, retaining walls, and other protective construction



integral to harbor serving coastal-dependent use functions. Ensure that all new or enhanced shoreline protective devices are consistent with all applicable LUP policies.

2.5.1-2 Critical Structure Repair

Repair, maintain and enhance where necessary critical structures such as revetments, breakwaters, groins, seawalls, retaining walls, and other protective construction integral to harbor serving coastal-dependent use functions. Ensure that repair, maintenance, and enhancement of shoreline protective devices is the least environmentally damaging feasible alternative and ensure that all adverse coastal resource impacts of the activities are mitigated, including with respect to local sand supply, public views, and public recreational access.

SCCa is pleased that the proposed updated LUP will provide maximum public access and recreational opportunities for the community. Thank you for the opportunity to comment.

Sincerely,

Paul Grisanti President

Smart Coast California