

Comments to Coastal Commission Draft Sea-Level Rise Policy Guidance due 2.14.2014

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California Adaptation Guide lists under Sea Level Rise the following:

This projected sea level rise includes global changes in sea level from thermal expansion and glacial melting, as well as regional changes in land elevation due to uplift and subsidence.

Not stated is the authority to determine that the condition exists to make those local decisions, as suggested by this guidance.

One of the flaws of guidance is the aspect of time; that is, of time of timely information.

An environmental document serves the life of a project, but an environmental document also serves the life of a General Plan and its Elements. There is no penalty for retaining outdated plans and no way to reverse decisions based on outdated and insignificant material.

Credibility is not even suggested in this document.

CEQA California Environmental Quality Act needs to be amended to address issues of Best Available Science to codify the use of applicable data based on facts and data collection and reporting. Modeling can create situations of the imagination because of insignificant data but may be consideration Best Available Science.

If the premise is incorrect, then the guidance and/or plan is incorrect and has no basis in the principles of this document.

Sea-level rise should be addressed across more jurisdictions than under the Coastal Act. The General Plan and the required Elements:

Land Use

Circulation

Housing

Conservation

Open Space

Noise

Safety

Flooding crosses the Elements of:

Land Use

Conservation

Open Space

Safety

This guidance needs to incorporate instruction from the Coastal Act and Sea-Level Rise into the General Plan and its Mandatory Elements.

Los Angeles County Flood Control District Sediment Management Plan was based on facts and conditions of decades ago.

Other than the courts, there is no process for incorporation of Elements and Guidance or for Federal and State requirements. There needs to be increased involvement with the Governor's Office of Planning and Research into the coordination and execution for local government planning.

Infrastructure cannot be addressed without current and accurate information of age, capacity, condition and life expectancy. Capital Expenditure Analysis is not required and there should be guidance to anticipate losses.

The Military has been omitted from this guidance, yet plays a critical role in the defense of this country.

Completely lacking in the discussion, is the budgetary condition of State Government and of the Local Governments and their capacity, or lack thereof, of execution. The excuse has always been "no money." There is an assumption that trained and qualified personnel will be in place. There is an assumption that the Final Governmental Decision maker (elected official, department head or employee) is qualified. That is not the case.

Local Coastal Programs LCP may not exist now, as in the City of Los Angeles.

Not all coastal earthquake faults are mapped under those official State and Federal geological agencies.

Department of Water Resources is now approaching issues around the 200-year storm event.

Weather and weather patterns should be included in this document, not just Climate Variability.

Nuclear disasters and radiation is omitted in this document.

There is no approach to hazardous conditions such as methane migration in areas of oil field activity-current or in the past. The City of Los Angeles sits on oil fields. Many coastal areas are oil fields. Fracking and the conditions of that operation should be incorporated into this document.

There are no Reporting Centers established for monitoring suggested in this document or any coordination on a State level.

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