



**California Coastal Coalition**  
**1106 Second Street, Suite 821**  
**Encinitas, CA 92024**

**STEVEN ACETI, J.D.**  
*Executive Director*



February 14, 2014

**Via Electronic Mail**

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SANDAG  
SCAG  
County of Los Angeles  
County of Orange  
County of San Diego  
County of Santa Barbara  
County of Ventura  
Orange County Sanitation Dist.  
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City of Carpinteria  
City of Capitola  
City of Coronado  
City of Dana Point  
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City of Encinitas  
City of Half Moon Bay  
City of Hermosa Beach  
City of Huntington Beach  
City of Imperial Beach  
City of Laguna Beach  
City of Long Beach  
City of Los Angeles  
City of Malibu  
City of Manhattan Beach  
City of Monterey  
City of Morro Bay  
City of Newport Beach  
City of Oceanside  
City of Pacific Grove  
City of Pismo Beach  
City of Port Hueneme  
City of Redondo Beach  
City of Rancho Palos Verde  
City of San Clemente  
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City of San Francisco  
City of Santa Barbara  
City of Santa Cruz  
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City of Solana Beach  
City of Ventura

Hon. Steve Kinsey, Chair  
California Coastal Commission  
c/o Sea-Level Rise Work Group  
45 Fremont Street, Suite 2000  
San Francisco, CA 94105

Re: Comments on Commission's Draft Sea-Level Policy Guidance

Dear Chair Kinsey,

On behalf of the board and members of the California Coastal Coalition ("CalCoast"), I respectfully submit the following comments regarding the Coastal Commission (the "Commission") Draft Sea-Level Rise Policy Guidance (the "Guidance") that was distributed for public review on October 14, 2013.

CalCoast is a non-profit advocacy group comprised of 35 coastal cities; five counties; SANDAG, BEACON and SCAG; private sector partners and NGOs, committed to protecting and restoring California's coastline through beach sand restoration, increasing the flow of natural sediment to the coast, wetlands recovery, improved water quality, watershed management and the reduction of marine debris and plastic pollution. As such, we share the Commission's concerns regarding sea-level rise ("SLR").

We recognize that the Commission is concerned about the potential impacts of sea-level rise ("SLR") on coastal resources and that the intent of the Guidance is, in part, to provide coastal communities with guidelines upon which to base their SLR policies and planning based on the best available science.

CalCoast shares many of the viewpoints already expressed to the Commission by local government and coastal stakeholders, however, we have the following reservations about the Guidance as currently drafted:

1. The Guidance may be interpreted by many as a regulatory document in the future.
2. The Guidance contains discrepancies in SLR projections.
3. The highly technical baseline analysis of coastal conditions called for in the Local Hazard Condition Analysis will be costly and time-intensive.

***CalCoast is an advocacy organization comprised of coastal communities and interest groups***

4. There will be unpredictability associated with certifying LCPs and Implementation Plans in conformance with the Guidance if it morphs into a set of regulations.
5. There will be significant fiscal impacts on coastal communities in an effort to comply with the Guidance if it morphs into a set of regulations.
6. The Guidance did not take into account studies and papers that have been published by Dr. Scott Sherman of Scripps Institution of Oceanography (“SIO”), Dr. Reinhart Flick of SIO and the Commission’s own coastal engineer, Lesley Ewing, showing that (a) SLR in Southern California is projected to be significantly lower than SLR in the Central and Northern Coast regions of California and the rest of the nation, and (b) beach sand nourishment at a number of locations in Southern California would mitigate against projected inundation of land along the coast.
7. It does not appear that the Commission has coordinated its efforts on SLR with the Department of Parks and Recreation’s Facilities Division, which manages the state’s beach restoration program formerly managed by the Department of Boating & Waterways (AB 64, The Public Beach Restoration Act, Laws of 1999), nor does it appear that the Guidance has been adequately vetted by state agencies, departments and commissions that have coastal jurisdiction, including the state’s Ocean Protection Council.

We respectfully urge the Commission to consider the foregoing concerns prior to finalizing the Guidance, especially items 6 and 7 above. We also urge the Commission to clearly state that the Guidance is not a regulatory document and that it will not be implemented as such.

Thank you for the opportunity to provide comments regarding the Guidance and we look forward to working with the Commission on the areas of concern expressed above.

Sincerely,

A black rectangular redaction box covering the signature of Steven Aceti.

Steven Aceti, JD