

City of Huntington Beach

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DEPARTMENT OF PLANNING AND BUILDING

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Planning Division



Building Division



February 13, 2014

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

SUBJECT: CALIFORNIA COASTAL COMMISSION DRAFT SEA-LEVEL RISE POLICY GUIDANCE

Dear Sea-Level Rise Working Group:

The City of Huntington Beach appreciates the opportunity to review and comment on the Draft Sea-Level Rise Policy Guidance document. With almost 10 miles of shoreline, understanding and preparing for sea level rise is critical to the City's long-term planning efforts. The Draft Guidance document provides a comprehensive, well-organized and useful basis from which local jurisdictions may begin their analysis. We offer the following comments as refinements.

General:

1. The Draft Sea Level Rise Policy Guidance document stipulates that this is a guidance document and not a regulatory document. However, the level of specificity of the document would suggest otherwise in terms of how it will be used by regulatory agencies.

Specific:

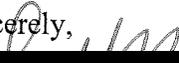
2. Page 6, #10, it states, "... avoid the perpetuation of shoreline armoring," which may be the only way to conform with #9 on page 6 – provide maximum protection of public beach and recreational resources. This seems to conflict with the intent of protecting natural resources.
3. Page 7, Step 4 and Page 9, first paragraph –if a jurisdiction does not update its Local Coastal Plan (LCP), will new development need to conform with the requirements of the CCC SLR Policy Guidance in the meantime for Coastal Development Permits (CDPs)?
4. The Guidance for Coastal Development Permits (CDP) on page 9 and pages 67-70 indicates that as part of each CDP, projects would need to complete a sea level rise analysis. If a local jurisdiction has completed a jurisdictional sea level rise analysis,

that is reasonably current, a project specific sea level rise analysis should not be required as a matter of course. To use CEQA parlance, individual projects should be able to rely on and tier off of area-wide sea level rise studies. We recommend that the Guidance document be amended to accommodate this.

5. Page 24, #5 – is the use of bluff retainment or shoreline protection devices completely forbidden? If a new development is proposed and an existing “bulkhead elevation” needs to be increased in elevation, is the Guidance document suggesting that the CDP not be approved?
6. Page 25, #10 discusses “hard shoreline protection” but does not discuss “islands” surrounded by bulkheads that may need to be rebuilt due to age and be increased in elevation for sea level rise. This topic should be included.
7. The suggestion on page 26 that individual projects evaluate impacts to an entire littoral cell or watershed, regardless of the project’s size or its location in the littoral cell, or the characterization of the littoral cell itself, is too far reaching and broad. A one-size-fits-all approach to analysis requirements will present an undue burden on many and be unnecessary for the majority of the coastal development permits that are requested, e.g. single family homes. While the language in item 13 hints at an acknowledgement of smaller projects, the text should be clarified and better articulate differentiation in cumulative impact requirements.
8. Page 40 of the Guidance recommends that current and future hazard areas be modified on a five to 10 year basis as part of updating a Land Use Plan. A 10 to 20 year time frame is a more realistic interval and, at this time, more than adequate to anticipate changes associated with hazard areas.
9. As part of the menu of adaptation strategies listed in Appendix C, we recommend the addition of rolling easements, as identified in the California Climate Adaptation Strategy.
10. With regard to the adaptation measures for Water Quality on page 158, it is not reasonable for the elimination of ocean outfalls due to the existing storm drain system within an agency. To redesign and construct new storm drain systems would be very costly and difficult to implement within established communities.

The City of Huntington Beach is in the process of conducting a SLR vulnerability assessment and appreciates the suggestions of the Draft Guidance document. We look forward to reviewing a revised final document that is more responsive to local coastal development permitting.

Sincerely,



Scott Hess, AICP
Director Planning and Building