

# MONTEREY COUNTY

## RESOURCE MANAGEMENT AGENCY

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February 12, 2014

Ms. Hilary Papendick  
California Coastal Commission  
c/o Sea-level Rise Work Group  
45 Fremont Street, Suite 2000  
San Francisco, CA 94105

Re: Comments on Draft Sea-Level Rise Policy Guidance

Dear Ms. Papendick:

Monterey County Resource Management Agency staff have reviewed the “Draft Sea-Level Rise Policy Guidance” (California Coast Commission, October 14, 2013) and participated in an educational webinar on the topic conducted by your office on December 5, 2013. In general, the Resource Management Agency supports efforts by the California Coastal Commission to provide policy guidance on issues related to sea level rise along California’s coast. Approximately 90 miles of California’s 1,100-mile coastline is located in Monterey County and will be impacted by rising sea levels. As you know, Monterey County is actively working to complete a comprehensive update of its Local Coastal Program to reflect changing circumstances and new scientific information, including new understandings and concern for the effects of climate change. As a part of this effort, Monterey County is collaborating with Santa Cruz County and Moss Landing Marine Laboratories (under the auspices of a grant from the Ocean Protection Council) to undertake technical studies to quantify the impacts of rising sea levels in the Monterey Bay Region. These local and regional efforts are important steps to address sea level rise impacts, but to be successful these efforts must be firmly anchored by policy directives agreed upon at the highest levels. The California Coastal Commission’s “Draft Sea-Level Rise Policy Guidance” is an important first step in forming this policy directive.

From our point of view, the “Draft Sea-Level Rise Policy Guidance” is an appropriate but incomplete response to projected sea level rise. What’s missing is unambiguous guidance for existing locales and facilities that play a unique or vital role in California’s coastal economy. These ports, harbors, research stations, villages, downtowns, highways, and railroads—these “Locales of Unique Value”—are vulnerable to sea level rise and in many cases should be protected and even allowed to expand and redevelop with clear

guidance and support from the California Coastal Commission. Moss Landing, as an important harbor for the Central Coast fishing industry and home to the Monterey Bay Aquarium Research Institute, Moss Landing Marine Laboratories, and other facilities, is certainly one of these “Locales of Unique Value.”

Principal No. 7 (page 24 of the “Draft Sea-Level Rise Policy Guidance”) touches on the concerns expressed above but only addresses coastal-dependent and coastal-related development. As such, it does not go far enough. The California Coastal Commission should actively support Local Coastal Programs that contain adaptive management strategies for “Locales of Unique Value” and that provide a policy basis for the streamlined review of development that implements such strategies. Coastal resources cannot be protected equally everywhere, and Local Coastal Programs are an appropriate tool to define local priorities for protection and adaptation. The California Coastal Commission’s “Draft Sea-Level Rise Policy Guidance” is an important place to recognize this fact.

We recommend the following revisions to Principle No. 7:

7. *Account for the social and economic needs of the people of the state; assure priority for development in “Locales of Unique Value,” including coastal-dependent and coastal-related development, over other development. In planning and project development concerning sea-level rise, assure that the social and economic needs of the people of the state are accounted for in accordance with Coastal Act Section 30001.5 (b), with special consideration for working persons employed within the coastal zone (Coastal Act Section 30001 (d)). Development in “Locales of Unique Value,” including Coastal-dependent and coastal-related development, may necessarily need to be sited in areas at risk from sea-level rise, and these developments should be sited and designed to minimize risks from sea-level rise and impacts to coastal resources. The California Coastal Commission will support Local Coastal Programs that contain adaptive management strategies for “Locales of Unique Value” and that provide a policy basis for the streamlined review of development that implements such strategies.*

Sincerely,

A black rectangular redaction box covers the signature area. A blue ink scribble is visible above the redaction.

Martin Carver, AICP, for:

Mike Novo, Director  
Resource Management Agency – Planning

cc: REF130105