



February 12, 2014

**Via Electronic Mail and United States Mail**

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

Re: Comments on the Draft Sea-Level Policy Guidance Document

Dear Chair Kinsey:

On behalf of the Coastal Cities Issue Group, which was created by the League of California Cities in recognition of the important role coastal cities bear in preserving California's coastal resources, promoting and maintaining public access to the coastline and implementing the California Coastal Act, we would like to provide comments in regards to the Draft Sea-Level Rise Policy Guidance document (Guidance Document) that was distributed for public review on October 14, 2013. We applaud the efforts of the California Coastal Commission (Coastal Commission) to create a Guidance Document that can be used as a resource to help coastal communities prepare for the challenges of sea-level rise. We commend you and your staff for taking proactive steps to address sea-level rise based on the best available science. More importantly, we appreciate your recognition of the importance of involving local land use regulatory agencies to address the consequences of climate change.

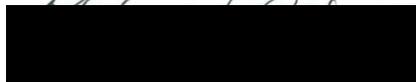
The members of the Coastal Cities Issues Group share many of the viewpoints already expressed to the Coastal Commission by other local agencies. However, we would like to highlight our collective concern that the Guidance Document may be interpreted as a regulatory document in the future. Additionally, we are concerned that the Guidance Document contains discrepancies in sea-level rise projections; that the highly technical baseline analysis of coastal conditions called for in the Local Hazard Condition Analysis will be costly and time intensive; that there will be unpredictability associated with certifying Local Coastal Plans and Implementation Plans in conformance with these policies; and that there will be significant fiscal impacts on coastal communities in complying with these complex regulations. We respectfully urge the Coastal Commission to consider addressing these key issues prior to the release of the final Guidance Document.

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In conclusion, we respectfully request that the Coastal Commission revise the Guidance Document to clearly state that it is not a regulatory document and will not be implemented as such. In addition, in light of the concerns expressed by coastal cities, and given the important role of local agencies in addressing sea-level rise through land use decisions, we are committed to working with the Coastal Commission to address our concerns. We are confident that the Coastal Commission and local agencies can work together in a collaborative fashion to produce a Guidance Document that can be used as a valuable resource.

Thank you for the opportunity to provide comments and we look forward to continuing to work with the Coastal Commission.

Sincerely,

A black rectangular redaction box covers the signature of Mark Wheatley. The signature itself is written in blue ink and is mostly obscured by the redaction.

Mark Wheatley  
Chair, Coastal Cities Issues Group  
League of California Cities