

February 14, 2014

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

Email: [SLRGuidanceDocument@coastal.ca.gov](mailto:SLRGuidanceDocument@coastal.ca.gov)

Subject: Input on the California Coastal Commission's Draft Sea-Level Rise Policy Guidance, Public Review Draft

Dear Ms. Papendick,

The San Diego Unified Port District (District) is responsible for the planning and development of California State tide and submerged lands (tidelands) around San Diego Bay to serve a general statewide purpose that is in accordance with the San Diego Unified Port District Act of 1962 (Port Act). It is the duty of the District to oversee public and private investment on the tidelands in a manner that best serves the interests of the public – in particular the people of the State of California and is consistent with The Public Trust Doctrine.

As a part of these responsibilities, the District serves as an economic engine and environmental steward for the San Diego Bay and region, and as such, we have taken a proactive, leadership role on climate-related issues for several years. Notably, the District adopted a Climate Action Plan on December 10, 2013 to address greenhouse gas emissions. Now, we are beginning to consider an approach to climate adaptation.

Given our recent experience on climate-related issues, the District appreciates the opportunity to provide comments on the draft Sea-Level Rise Policy Guidance Document (SLR Policy Guidance). We look forward to working with the California Coastal Commission (Commission) staff on this important issue and respectfully request that you consider the District's initial comments.

The SLR Policy Guidance essentially follows a process outlined in the Ocean Protection Council's Sea-Level Rise Guidance, originally released in 2010 and updated in 2013. The Port utilized this same source when beginning its own adaptation planning and appreciates the methodical, scientific approach. Due to the high degree of uncertainty that exists with sea-level rise projections (especially for the more distant time horizons), creative, flexible solutions are needed that allow for sound investments and continued

economic development and environmental stewardship. There are several areas in the SLR Policy Guidance that need further clarification, if the final document is to be optimally useful for local and regional agencies, practitioners, and the Commission. These areas are identified below:

1. We request a broader array of flexible adaptation measures be included in the SLR Policy Guidance, which will allow for continued and responsible development. We also suggest reinforcing the point that there are a variety of adaptation strategies available and depending on the geographic area, pattern of development, and existing environment such strategies should be determined on a case-by-case basis.
2. When seeking approvals from a regulatory agency, such as the Commission, the agency's own guidance can likely be seen as requirements for approvals. We encourage reiteration that the SLR Policy Guidance will be a tool for Commission staff to work with agencies to find most reasonable, cost-effective, and balanced solutions in a collaborative manner and is not mandatory.
3. The SLR Policy Guidance should more clearly distinguish how it will apply to existing development, new development and redevelopment, in highly urbanized environments, like those located in and around San Diego Bay. Specifically, the document should clarify its application to existing development, new development and redevelopment on State tidelands and open water.
4. The SLR Policy Guidance includes a discussion that states the proposed project life expectancy of a project may need to be shortened, if constrained by hazards. However, it is unclear how this approach would be handled during the regulatory review process. To District staffs' knowledge, project life expectancy is not associated as a standard with any other natural hazard and the SLR Policy Guidance does not provide any direction on how this approach would be handled in practice by local or regional agencies. Further direction and a rationale for this approach should be provided to help the District clearly understand the intent of this concept.
5. Future grant opportunities to update coastal plans should include Port Master Plans. The District is concerned about the cost and resources it would take to implement the SLR Policy Guidance.
6. Clarification on what parts of the SLR Policy Guidance are intended to be used by ports versus cities and counties would also be helpful.

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The District is dedicated to protecting and improving the environmental conditions of San Diego Bay, State tidelands and neighboring communities, in balance with maintaining a thriving, enjoyable and economically vital waterfront. The District looks forward to continuing to work together to ensure our continued success and sustainability of our most valuable asset – the California coast.

Thank you for your consideration.

Sincerely,



Jason H. Giffen, Director,  
Environmental and Land Use Management

cc: Wayne Darbeau, Executive Director  
Executive Leadership Group