



CHANNEL ISLANDS HARBOR
Ventura County Harbor Department

Lyn Krieger
Director

3900 Pelican Way • Oxnard, CA 93035-4367 • (805) 382-3001 • Fax (805) 382-3015

February 13, 2014

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

**Re: California Coastal Commission
Draft Sea-Level Rise Policy Guidance
Response to Administrative Draft**

Thank you for the opportunity to comment on the California Coastal Commission (CCC) Draft Sea-Level Rise (SLR) Policy Guidance Document. The County of Ventura Harbor Department recognizes your efforts to address sea-level rise and to provide a resource that might help coastal communities prepare for the challenges ahead.

The following comments relate to the Guidance Document from the perspective of an operating waterfront, and pertain specifically to the issues that impact Channel Islands Harbor and the immediate surroundings.

The draft guidelines as issued for public comment address "recommendations for addressing sea level rise in Local Coastal Programs (LCP's), Coastal Development Permits (CDP's), and other actions pursuant to the Coastal Act."

Updates to Local Coastal Programs are a significant, time consuming, and costly undertaking for local agencies. Without some independent source of funding, combined with availability of staffing both at Coastal Commission offices and in our local jurisdictions, we believe it is unlikely that a majority of agencies will undertake this process in the near future. This limits the potential functionality of your recommendations, since most jurisdictions will be operating under their current, mostly outdated, plans. This leaves local agencies without some consistent standards or procedures embedded in LCP's and certified by the California Coastal Commission, leading to uncertainty about standards for processing. Under these circumstances, it is unclear what tools local agencies will have to require or facilitate such reviews.

For those agencies, such as ours, with another form of planning document certified by the California Coastal Commission, in our case a Public Works Plan, there are no Coastal Development Permits, merely Notices of Impending Development subject to the currently certified document as the standard of review. It is unclear how the proposed guidance would be applied to these situations, since the standard of review is already established. Again this leads to uncertainty in processing, often resulting in slower processing times, increased costs, and frustration on all sides. These factors are compounded by the fact that, as currently established, agencies with other forms of coastal planning documents than LCP's are ineligible for grant funding for updates, further discouraging efforts to update outdated documents.

We support the consideration of the project life when reviewing specific projects for sea level rise issues.

However, we do not agree that a 75-100 year project life is always a reasonable measure, and urge that some standards be adopted for the estimated life of building types before significant renovation is required. Marinas, for example, have a lesser-expected life than most structures, and utility structures have less than apartments or hotels. There are some industry guidelines that could be utilized as a baseline for this exercise. Some local agencies have such standards in place already, particularly where ground leases are timed in an effort to coincide with building life.

The draft guidelines repeatedly mention new developments, but there is little in the document about reinvestment in existing properties.

What is the expectation of the Commission for review of such properties? At what level of renovation might review occur? What about property redevelopment when the intent is project replacement in kind?

The projected effects of sea level rise are evolving as data becomes available and the science is refined.

How will these guidelines and/or any subsequent regulations reflect this continuing evolution of scientific data so as not to require agencies to conduct studies or seek information that is no longer relevant?

Harbors already give consideration to and plan for ocean intrusion.

The Guidance Document presents some ambiguities for the protection of harbors from potential flooding due to sea level rise. As you must be aware, harbor flood defenses include jetties, seawalls, groins, tide gates, storm water pump systems, groundwater dewatering systems, and elevated finished floor elevations. However, these harbor flood defenses are only effective when working together. These flood defense

Hilary Papendick
California Coastal Commission
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measures, especially the public and private seawalls, act as a unit to protect residential, commercial and industrial properties and facilities around in coastal zone including boat yards, fuel stations, marine supply facilities, recreational facilities, tourist-serving facilities, houses, hotels, and restaurants. These flood protection defenses allow for commercial and recreational boating and fishing activities, as well as safe beach access for residents and visitors. We believe that the Guidance Document should be revised to reflect that several items in the Guidance Document would not be applicable in urbanized areas or to the maintenance, replacement or protection measures of property and facilities in, around and adjacent to a harbor's flood protection facilities.

Again, we appreciate the efforts of Commission staff to provide guidance on this issue. We stand ready to work with you, and to answer any questions that our comments might generate. Thank you for this opportunity to provide comments from the Ventura County Harbor Department.

Sincerely,



LYN KRIEGER
Director