

Comments COASTAL COMMISSION Revised Draft Sea-Level Guidance Policy due 7.10.2015

Guidance needs to tie into regulatory issues to be effective. Guidance also needs to be applicable to financial reality and procedural reality.

In order to be DYNAMIC, accurate information and data must be collected and be current. In attending SEA-LEVEL RISE events, poor modeling based on available data and not applicable data can waste time and money.

Local Coastal Program (LCP) certifications and updates and Coastal Development Permit (CDP) decisions need to be based on plans that are current. In the City of Los Angeles, not all coastal regions have a LCP and following the regular planning process without any emphasis on the PUBLIC TRUST DOCTRINE and the importance of maintaining its coastal assets. CDP are not always based on environmental investigation, as we are seeing more Mitigated Negative Declarations and Negative Declarations processed without regarding to the fragile environmental conditions. Building permits are issued by-right in many cases, bypassing the environmental process.

Legal requirements are bypassed easily. There is minimal coordination with local governments but reliance on the staffs of local governments and their documentation, whether accurate or not.

Without proper environmental review, the science and the reports generated by investigations and research are bypassed. General Plans are old as are Community Plans. Complete Streets and the Circulation Element may not even be submitted. Framework Element is ignored thereby ignoring Mitigation and Monitoring Measures as well as Infrastructure reporting. Since development is driven by increased density, the Governor's Office of Planning should be brought in when these plans lag.

State Coastal areas need to be divided and recognized for the impacts. The Southern California Bight produces different impacts on the shoreline than other areas in the State and receives impacts from coastlines to the north, such as oil pipelines breaks. You have left off the SANTA MONICA BAY RESTORATION COMMISSION as an agency involved in the Coast.

Water Quality is directly related to NPDES permitting and that permitting should be reviewed by each Regional Water Boards' orders. Adaptation has to be applied with facts and not policy. Coastal Zone Management Act is not governed by the Water Boards, yet they execute Storm Water Capture mechanisms in their permitting to collect all runoff into the ocean (Los Angeles MS4 permit). This may have an effect on the coast itself, but there is no science to justify storm water capture as a water quality

compliance mechanism. This permit is creating a built environment for storm water capture and not a protection of coastal assets and wildlife. It may contribute to the decline of tourist and coastal economies.

Floodplain Management Plans should be reviewed for accuracy and current status. Levees may be rated low and vulnerabilities for flooding higher than normal.

Soils and Geology reports as well as Hydrology and Water Quality reports are crucial for the coast.

Little outreach is executed to involve the Public in Water Board of Floodplain Management issues. Few realize that Local Coastal Programs exist unless they live in the vicinity of an approved plan.

Joyce Dillard

