

*Scenic Pacifica*  
Incorporated Nov. 22, 1957

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## CITY OF PACIFICA

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January 14, 2014

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

Ref: Draft Sea-Level Rise Policy Guidance document.

To Whom It May Concern,

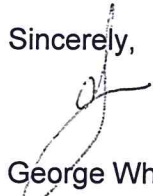
Thank you for the opportunity to review the "Draft Sea-Level Rise Policy Guidance" document. While we understand the importance and critical nature of establishing guidelines for future development in areas potentially subject to future sea level rise, some clarity and further consideration of exactly how the proposed policies are to be applied and implemented by the Coastal Commission and its staff would be greatly appreciated. Specifically, please consider the following comments and concerns regarding the draft document:

- While the document clearly indicates that it is intended "*to function as guidance, not regulations. It does not govern the planning and regulatory actions that the Commission or local governments may take under the Coastal Act and subject to the applicable requirements of the Coastal Act, the Coastal Zone Management Act, certified LCPs and other applicable laws and regulations*" many of the recommended actions relative to the modification of the Local Coastal Plans (LCP) and the processing of Coastal Development Permits (CDP) appear regulatory in nature. How will the Commission and its staff apply and implement these recommended policies absent corresponding local policies and regulations?
- Given that developing the appropriate policies and recommendations suggested by the Guidance document will be a time consuming and expensive task for local governments, will the Commission provide additional staff and monetary resources to assist in these efforts? (As a side note, City staff has applied for several grants to cover the cost of adaptation and hazard mitigation plans without success due to the overwhelming competition for these funds) Will additional grant opportunities be available to local jurisdictions for this purpose?
- The draft policies appear to take a one size fits all approach to this very complicated issue. The City is not aware of any area specific studies that have been conducted regarding the potential for sea level rise in and around Pacifica. Will the Commission engage in or support further area specific studies to better understand the science behind sea level rise in Pacifica and other coastal jurisdictions?

- The City has projects in the LCP amendment/CDP approval pipeline that are subject to Commission jurisdiction and final action. How will these projects be affected by the new policies relative to sea level rise? Specifically, will projects be required to retroactively modify applications and/or provide additional analysis relative to this issue? For example the City is in the final stages of a multiyear process to update its General Plan which includes an amendment to the LCP. Will the commission require additional policies, programs and analysis relative to sea level rise for a project of this magnitude that that has been in process for several years?
- Will the Commission endeavor to meet directly with City staff, property owners and other interested community members to facilitate the implementation of these new policies and assist in understanding the realities of the sea level rise issue in Pacifica?

Again, thank you for considering these comments. Should you have any additional questions, please do not hesitate to call me at (650) 738-7440.

Sincerely,



George White

Planning Director

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