



April 14, 2017

Item 7

The Honorable John Laird, Secretary for Natural Resources  
Chair, California Ocean Protection Council  
California Resources Agency  
1416 9<sup>th</sup> St., Suite 1311  
Sacramento, CA 95814

**Re: Comments on the Resolution of the Ocean Protection Council to Update Sea-Level Rise Guidance**

Dear Secretary Laird and Members of the Ocean Protection Council,

California Coastkeeper Alliance unites locally-based Waterkeeper organizations to fight for swimmable, fishable, drinkable waters for California communities and ecosystems. On behalf of California Coastkeeper Alliance (CCKA), NRDC, Heal the Bay, WildCOAST, and Surfrider Foundation we welcome the opportunity to offer support for the Proposed Resolution of the California Ocean Protection Council (OPC) on Updating the *State of California Sea-Level Rise Guidance Document* (Resolution).

Our organizations were heavily involved in the development of OPC's initial Sea-Level Rise Guidance Document in 2011. The 2011 Resolution not only provided valuable planning guidance, but also set an important precedent for ensuring effective inter-agency coordination and use of best-available sea-level rise science. However, the recently released Science Advisory Team Working Group Report on Sea-Level Rise Science (Science Report) acknowledges that the science, available technology, and policy landscape around sea-level rise, are rapidly changing, which makes an update to the Guidance Document timely and necessary. We offer a few comments to guide OPC's update of the Guidance Document to ensure a robust and inclusive public process, and to ensure that the guidance ultimately developed can be most effectively used by state and local managers and citizens.

The proposed Resolution reflects OPC's intent to update the Sea-level Rise Guidance Document based on new state laws that implement the Governor's Executive Order B-30-15, which directs state agencies to factor climate change into planning and investment decisions and directs local governments to incorporate climate change adaptation and resiliency strategies into the safety elements of their general plans. We urge OPC to also ensure that the updated guidance acknowledges the roles of the state's coastal management programs including those implemented by the Coastal Commission, BCDC, State Lands Commission, and local jurisdictions with coastal programs and tidelands grants, which are on the front lines of addressing sea-level rise. In many cases, these agencies and jurisdictions are already undertaking sea-level rise planning and implementation actions using previous statewide guidance, as well as agency-specific guidance. We recommend that the updated Guidance Document explain how such efforts would incorporate evolving sea-level rise projections and underlying science.

We are also pleased to see that OPC has already initiated a thorough, yet expedient, review of the science and that the proposed Resolution reflects OPC's intent to incorporate this new information. The Science Report emphasizes the serious and imminent threat sea-level rises poses for California and the greater loss that will occur without immediate action. We are encouraged to see OPC recognize this threat and its urgency with a certainty that we believe was missing in the 2011 Resolution and believe is critical for the success of the proposed Resolution.

CCKA looks forward to working with OPC to develop the new guidance to ensure that it reflects coastal resilience and coastal access best practices and principles. We believe the Guidance Document should prioritize non-structural adaptation strategies and restrict the use of structural barriers, such as sea-walls, in order to enhance natural adaptive capacity. As such, we are encouraged that the prioritization of natural infrastructure is one of the guiding principles of the proposed Resolution, as put forward by the Governor's Executive Order B-30-15. Prioritizing natural infrastructure over structural barriers, such as sea-walls, will also help ensure the protection of public access to

coastal areas. In addition to ports and shipping, two industries certainly at risk from sea level rise, California's \$44 billion a year blue economy, the nation's largest, is driven by coastal recreation and tourism.<sup>1</sup> OPC must protect these industries by protecting the beaches and communities upon which they depend.

We recommend the forthcoming Guidance Document also address new and existing vulnerable developments in hazard zones. This includes new coastal infrastructure – such as desalination and wastewater treatment facilities – that is proposed in many places in anticipated inundation zones. In addition, we hope to see the guidance urge sea-level rise planning that protects and buffers critical habitats such as wetlands. These landscapes provide valuable coastal defense against sea-level rise and storm surge and are, globally, a significant carbon sink.<sup>2</sup> With proper planning and protection, they can adapt and migrate inland in response to changing conditions and thus retain their climate mitigation, habitat, and pollution-attenuation benefits.

Finally, we hope to see OPC consider environmental justice and disadvantaged communities, both in the updated Guidance Document and in the stakeholder process, including through active engagement of frontline communities and environmental justice experts.

As the Science Report explicitly states, current policy will shape the future of California's coast, and the communities and industries it sustains. As such, we are glad to see that OPC is taking this threat so seriously and are strongly supportive of the proposed Resolution and OPC's broader efforts to maximize California's coastal resilience. We look forward to working with OPC staff in the coming months to ensure that the updated Guidance Document reflects the guiding principles of the Resolution and goals of our organizations.

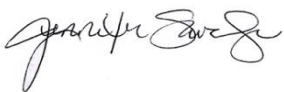
Sincerely,



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<sup>1</sup> Kildow, J.T., C.S. Colgan, J.D. Scorse, P. Johnston, and M. Nichols (2014). State of the U.S. Ocean and Coastal Economies 2014. National Ocean Economics Program.

<sup>2</sup> San Francisco Bay Conservation and Development Commission (2012). San Francisco Bay Plan.  
<<http://www.bcdc.ca.gov/pdf/bayplan/bayplan.pdf>>.