



September 12, 2011

The Honorable John Laird, Secretary for Natural Resources
Chair, California Ocean Protection Council
California Natural Resources Agency
1416 Ninth Street, Suite 1311
Sacramento, CA 95814
VIA ELECTRONIC MAIL: opc.comments@scc.ca.gov

Re: Comments on Ocean Protection Council Draft Strategic Action Plan

Dear Chair Laird and Ocean Protection Council Members:

Thank you for your work on this important plan. We see it as vital to the protection and preservation of our finite coastal resources and vital to California's economic health.

Overall, we are pleased with OPC's strategic plan. However, we were a bit dismayed to hear staff reassuring the desal representatives at the Orange County workshop that the final plan would not cause them any great difficulties. It was as if to say it would not be specific and that there would plenty of wiggle room for them. This is inconsistent with the leadership position your organization should be taking on this important issue.

You have heard and will hear a lot from others regarding desalination, so I will just briefly state that Sierra Club is supportive of your existing policy on no open-ocean intakes and co-location of facilities using Once-Through Cooling, but we see the need for policies on "in-plant dilution" and analysis of the impacts of desalinization.

While we agree other agencies are addressing the science and restoration of wetlands, we strongly believe the OPC needs to provide policy and guidance on the protection of tidal wetlands from sea-level rise. Please add specific metrics in the OPC's Strategic Plan for this protection. Policy, coordination and guidance to protect the coast is the role of the OPC. The California Adaptation Strategy directs the OPC to develop "Decision Guidance," which should address protection of habitat, especially tidal wetlands.

We also need OPCs assistance with the ongoing problem of sea walls and shoreline armoring. Sea walls are the single worst coastal crisis in California. We are slowly but surely walling off the entire coast. These development activities don't stop erosion, they make it worse. We need a better solution and we need your help. It's time to identify and implement long-term solutions to coastal erosion issues up and down our coast, alternatives that are much more sensitive to coastal access, the natural environment, aesthetics, and recreation. Solutions need to include a Comprehensive Program of Managed Retreat for the entire coast.

We appreciate the OPC's focus on guidance and outreach to local governments as 90% of the coast is under the control of local government, but sadly this is not always to the benefit of our finite coastal resources. We strongly support the OPC's call for updates of Local Coastal Programs. We would further ask the OPC to make a request to the Governor and Legislature to provide administrative authority to the California Coastal Commission to assure the timely update of Local Coastal Programs, and in fact ask for revisions to the Coastal Act that would grant the Coastal Commission the authority to de-certify or suspend an LCP when the local government fails to effectively implement their LCP in conformance with the Coastal Act. Effective implementation includes enforcement as well as implementation of Commission recommendations resulting from periodic LCP reviews. During my brief conversation with Amber Mace at the OC workshop she didn't seem to think that this fell under the OPC's purpose, but I ask that you revisit this important issue and re-evaluate the OPC's involvement.

Lastly, we greatly support the urgency statement in the OPC's Strategic Plan to plan for climate change and ask that the OPC share that concern with the Governor and the Legislature accordingly.

Thank you again for your work.

Sincerely,

Penny Elia

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