

CALIFORNIA COASTAL COMMISSION

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To: California Ocean Protection Council
From: California Coastal Commission staff
Date: May 31, 2024

Re: Support for the Proposed Final 2024 State Sea Level Rise Guidance (Item 4)

To the Ocean Protection Council:

Coastal Commission staff are writing to support the adoption of the Proposed Final 2024 State Sea Level Rise Guidance Update at the June 4, 2024 meeting of the Ocean Protection Council (OPC). The guidance fulfills its fundamental purpose of summarizing the latest best available sea level rise scenarios while also providing detail on the importance of adaptation pathways, monitoring, and triggers. It retains an appropriate emphasis on a precautionary approach to planning and adaptation, which has long guided California's approach to climate change and sea level rise.

Coastal Commission staff have a productive history of coordinating with the OPC staff and other state agencies on the State Sea Level Rise Guidance and many other initiatives related to sea level rise, including through the State Sea Level Rise Collaborative. OPC staff engaged with agency partners at many stages of development of the Guidance, and Coastal Commission staff appreciate the valuable collaboration. The resultant document addresses input and feedback from Coastal Commission staff. OPC staff have also engaged with the Coastal Commission Local Government Working Group which facilitated a useful exchange with local government representatives from the League of Cities and the California State Association of Counties.

Coastal Commission staff intend to draft an update the Coastal Commission Sea Level Rise Policy Guidance to align with this update of the State Sea Level Rise Guidance. The Coastal Commission document will reflect the content of the OPC Guidance but provide more detail and refined recommendations specific to the Coastal Act and Coastal Commission planning and permitting processes. Staff's goal is to launch public review of the Draft Coastal Commission Sea Level Rise Policy Guidance soon after this Council adopts the State Sea Level Rise Guidance.

Again, we support adoption of the State Sea Level Rise Guidance and thank the Ocean Protection Council and its staff for their partnership and collaboration.

Sincerely,
DocuSigned by:

A handwritten signature in black ink that reads "Kate Huckelbridge".

Kate Huckelbridge

Executive Director | California Coastal Commission



City of Santa Barbara

Office of the Mayor

SantaBarbaraCA.gov

RRowse@SantaBarbaraCA.gov

Randy Rowse
Mayor

June 3, 2024

Wade Crowfoot, Secretary of Natural Resources and Chair
California Ocean Protection Council

Transmitted via email: COPCpublic@resources.ca.gov

City Hall
735 Anacapa Street
Santa Barbara, CA
93101-1990

RE: 2024 State of California Sea Level Rise Guidance

Dear Chair Crowfoot and Members of the Ocean Protection Council,

Mailing Address:

PO Box 1990
Santa Barbara, CA
93102-1990

Tel: (805) 564-5322

Fax: (805) 564-5475

Thank you for the opportunity to comment on the 2024 State of California Sea Level Rise Guidance: 2024 Science and Policy Update (2024 Guidance). An incredible amount of work has been done by Ocean Protection Council (OPC) staff, the California Ocean Science Trust, and the Sea Level Rise Task Force in developing the guidance. Members of our Council and staff participate in the California Coastal Commission (CCC) Local Government Working Group and have had the opportunity to discuss the 2024 Guidance with the OPC team. We have greatly appreciated these discussions and thank you for taking the time to answer our questions and hear about how the previous guidance documents have been implemented at the local level.

Our staff have provided OPC staff detailed comments previously on the Draft 2024 Guidance that have predominantly been addressed by OPC staff. There is one major issue remaining, though, with the 2024 Guidance and that is regarding the use of the High Scenario. We request that the 2024 Guidance be amended to recommend that for critical infrastructure, the high scenario be disclosed as a possible future to be tracked over time, but that detailed adaptation planning focus analysis on the Intermediate and Intermediate-High Scenarios. This should be combined with monitoring of ongoing conditions and regular updates to adaptation planning as new best available science emerges. The guidance would also benefit from more clearly acknowledging that differing types of critical infrastructure (water lines versus policy stations) have different risk tolerances and consequences of failure and, as such, will require differing levels of evaluation.

The City of Santa Barbara is deeply committed to proactively planning for the impacts of climate change. In 2019, we certified a comprehensive update to our Coastal Land Use Plan, including incorporating sea level rise into development regulations. In 2021, our Council approved the City's first Sea Level Rise Adaptation Plan and subsequently formed a Climate Adaptation Program within our Sustainability and Resilience Department charged with implementing the highest priority projects outlined in the plan. Since 2021 we have obtained over \$5 million in grant funds to launch four major adaptation projects of our airport, waterfront, harbor, and wastewater infrastructure. As part of those projects, we are looking at not just the impacts of sea level rise, but also other climate hazards such as increases in fluvial flooding from changing rainfall patterns. We are also working regionally with the Beach Authority for Clean Oceans and Nourishment (BEACON) on development of a regional coastal adaptation monitoring program.

The previous State of California Sea Level Rise Guidance documents have been key to our success as they ensure all state and local agencies are using the same best available science. We appreciate that the new methodology for the sea level rise scenarios in the 2024 Guidance closely aligns with nationwide data and methods contained in NOAA's 2022 Sea Level Rise Technical Report. This, combined with new recommendations in the report to utilize USGS's Coastal Storm Modeling System and evaluate impacts to groundwater levels, toxic sites, and socioeconomic factors, will provide local governments across the state with more consistent methodologies for analyzing the impacts of sea level rise.



Please consider the environment before printing this letter.

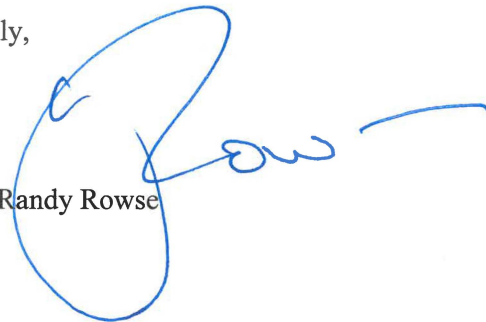
Our concern with use of the High Scenario stems from our strong commitment to start adapting our community as soon as possible and a need to gain public support of these efforts. In the last five years since the 2018 Guidance has been in place, we have witnessed firsthand several negative impacts from utilizing extreme sea level scenarios in sea level rise planning. While these extreme scenarios are among many other more likely scenarios evaluated, the public tends to focus on the extreme scenarios and the reaction is not action, but a sense of hopelessness. We have also witnessed erosion of public trust when community members hear how unlikely these scenarios are and see the projections from these extreme scenarios change dramatically over time. Based on our experience, we believe we will gain a lot more buy in by focusing our efforts on more likely projections. Given that we are a built-out City, the difference between adapting to the Intermediate-High Scenario versus the High Scenario is significant and represents a major hurdle logistically and financially. Instead of losing momentum by trying to plan in detail for an extreme worst case in the long term, we would like to focus on more reasonable adaptation projects that can more feasibly be achieved, and which provide examples for our community to build upon. At this point, that is the best use of our limited staff capacities and funds.

We support OPC's desire to have a precautionary approach to planning for sea level rise. It is made clear in the report that the range of most likely projections of sea level rise is contained within the Intermediate-Low and Intermediate Scenarios. The Intermediate-High Scenario then represents a precautionary projection that the report states is "the plausible high-end projection for 2100 should rapid ice sheet loss contribute to sea level rise." In contrast, the descriptions of the High Scenario in the report include phrases such as: "contains deep uncertainties and ambiguity"; "a statement about the likelihood of reaching this scenario is not possible"; "before 2100, the High Scenario is significantly above the range of SSP AR6 scenarios"; and "should be used with caution and consideration of the underlying assumptions in planning adaptation." It will be very hard to justify to our community why a scenario with these types of caveats should be heavily relied upon to adapt our infrastructure at this time.

We have enjoyed a productive relationship with OPC and CCC staff on policy issues related to sea level rise and we are happy to work with both agencies on further edits and examples for the 2024 Guidance and the upcoming updates to the CCC sea level rise guidance documents. We will not be able make the substantive changes needed to address climate changes statewide without working together and incentivizing proactive adaptation at the local level. To that end, we hope you will closely consider our comments on the 2024 Guidance. If you have any questions, please contact Melissa Hetrick, Resilience Program Supervisor, at 805-991-2447 or mhetrick@santabarbaraca.gov.

Sincerely,

Mayor Randy Rowse

A handwritten signature in blue ink, appearing to read "Rowse", is written over the printed name "Mayor Randy Rowse". The signature is fluid and cursive, with a large loop at the beginning and a long horizontal stroke at the end.

June 3, 2024

Dear Ocean Protection Council,

A facet of University of Southern California (USC) Sea Grant's mission is to foster public understanding of coastal science and provide innovative science for better decision-making. **USC Sea Grant would like to express our support for the Ocean Protection Council's commitment to updating the statewide sea level rise guidance every five years (Action Item #4).** The "DRAFT: State of California Sea Level Rise Guidance: 2024 Science and Policy Update," will serve as important guidance for informed sea level rise adaptation planning.

We recently completed the fourth in a longitudinal survey of coastal practitioners to ascertain community progress in coastal change planning, and what information is needed to support those planning efforts. The following features of the guidance are particularly pertinent to the expressed needs of these constituents:

- Providing updated sea level rise predictions based on the projections in the Intergovernmental Panel on Climate Change Sixth Assessment report (IPCC AR6), the 2024 Science and Policy Update will allow coastal managers in our region and beyond to accurately plan adaptation to sea level rise.
- Outlining the elements of a decision framework for creating an adaptation plan or project will be helpful to coastal managers.
- Including the step by step instructions on how to complete a vulnerability assessment, especially with the use of NOAA tide gauges, is a very useful tool for coastal practitioners seeking to apply the most recent sea level rise guidance.
- Highlighting the ways that rising sea levels and groundwater will magnify coastal hazards and emerging risks to the environment and infrastructure

Finally, USC Sea Grant unequivocally supports the statement that marginalized communities and peoples have historically faced disproportionate impact from climate change and that this must be addressed in coastal adaptation planning statewide.

USC Sea Grant looks forward to the adoption of this draft and plans to circulate it and its findings to community partners for use in adaptation planning, when it becomes official.

Sincerely,



Phyllis Grifman, Executive Director