

**CALIFORNIA COASTAL COMMISSION**

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August 31, 2017

Mindy Fogg  
Planning and Development  
County of Santa Barbara  
123 East Anapamu Street  
Santa Barbara, CA 93101

**RE: County of Santa Barbara's Draft Coastal Hazard Land Use Plan Policies and Coastal Zoning Ordinance Update – Coastal Resiliency Project**

Dear Ms. Fogg,

This letter provides our general comments on the County's second draft of the Coastal Hazard Land Use Plan (LUP) policies and the proposed updates to the Coastal Zoning Ordinance (CZO). These policy documents were submitted to the Coastal Commission via email on June 14, 2017 as a deliverable for Task 10 of the grant for a sea level rise focused update to the County's certified Local Coastal Program (LCP-14-06). Please find more specific comments and suggestions (in track-changes) on the attached LUP policy chart and CZO document.

- 1. Sea Level Rise Hazard Mitigation.** Several policy changes were not included in the County's second draft of policies, because, as the County stated, the policies or policy changes did not relate specifically to sea level rise (SLR) hazard mitigation. Such policy changes that were not included in the County's second draft typically had to do with how SLR hazards could affect a particular coastal resource. However, Commission staff asserts that mitigating the effects of SLR hazards upon coastal resources, rather than merely mitigating the effects of SLR hazards on development, is a key aspect of the broader topic of SLR hazard mitigation and therefore should be included in this LCP update. Both the grant work program and the SLR vulnerability assessment address these topics, and the grant work program does not explicitly state that the scope of the LCP update will be limited to SLR hazards upon development. Incorporating SLR considerations into policies related to coastal resources is a critical aspect of carrying out the resource protection policies of the Coastal Act.
- 2. Policy Implementation in Coastal Zoning Ordinance.** We reviewed the County's proposed draft changes to the CZO portion of the LCP and offered several suggested changes and additions in the attached document. However, our review did not focus on ensuring that all proposed and suggested policies of the LUP were adequately implemented in the CZO. As you know, the CZO must be fully consistent with and adequate to carry out the LUP policies. Therefore, as part of the next step in development of your Coastal Resiliency Project LCP amendment, we recommend that the County ensure that all of the updated LUP policies are properly implemented in the CZO.
- 3. Draft Sea Level Rise Residential Adaptation Policy Guidance.** Recently, the Commission published a Draft Residential Adaptation Policy Guidance document, which is intended to serve as a supplement to the Commission's 2015 SLR Policy Guidance. Commission staff recommends that

the County consider using this document as an additional resource for refining or crafting policies and implementation measures that relate to residential adaptation. The public comment period is now open for the Draft Residential Adaptation Policy Guidance, so we would welcome the County's input on this draft document as well. The draft policy guidance and instructions for submitting comments can be found on our website at:

<https://www.coastal.ca.gov/climate/slr/vulnerability-adaptation/residential/>

We really appreciate the County's coordination and hard work on this important LCP update. Please do not hesitate to contact us to discuss any questions or concerns regarding these broader comments or the more specific comments and suggestions contained in the attached policy chart and CZO document.

Sincerely,



Deanna Christensen  
Supervising Coastal Program Analyst

**cc:** Carey Batha, California Coastal Commission  
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**Attachments:** County's Draft Coastal Hazard Land Use Plan Policy Chart with August 2017 CCC Comments, County's Draft Coastal Zoning Ordinance Updates with CCC Comments