

November 1, 2018

City of Huntington Beach  
2000 Main Street  
Huntington Beach, CA 92648  
Attn: Ricky Ramos

Dear Mr. Ramos --

Thank you for providing the "Coastal Staff suggested mods" for review by the Sunset Beach LCP. Upon our initial review, we're confused by the extreme level of detail that is included in the suggested mods. This confusion is based on Article 2 of the Coastal Commission Regulations regarding the preparation, approval and certifications of local coastal programs. These regulations appear to support the authority of the local government and discourage plans that are *"not so detailed as to require amendment and commission review for minor changes, or to discourage the assumption by local governments of post certification authority which ensures and implements effective protection of coastal resources."*

Additionally, per the regulations: *"the Legislature also recognizes that the applicable policies and the level of specificity required to ensure coastal resource protection may differ between areas on or near the shoreline and inland areas."*

During our initial review, we've identified significant concerns but before we get further into the details, could you please confirm under what authority the coastal commission staff is operating under that allows them to provide such detailed suggested mods? If these detailed mod are truly "suggested," what level of change can we suggest, especially to those unique to Sunset Beach and/or those that have the potential to result in more cost-effective solutions while still meeting concerns.

We look forward to your response.

Sincerely --

Timothy D. McCormack  
Chair, Sunset Beach Local Coastal Plan (Sunset Beach L.C.P.)