



March 7, 2019

Chair Dayna Bochco
Honorable Commissioners
Executive Director John Ainsworth
California Coastal Commission
Via email to Commissioners and Staff

RE: Coastal Commission Environmental Justice Policy Equal Access Comments

Dear Chair Bochco, Honorable Members of the Commission, Director Ainsworth, and Staff:

Public comments submitted to the California Coastal Commission (CCC) between August 9, 2018 and February 21, 2019, demonstrate widespread support for civil rights, environmental justice, and health equity principles in Commission policies, programs, and activities. People repeatedly emphasize equal access, and protections against discrimination, on the basis of background, culture, race, color, religion, national origin, ethnic group, age, income, disability status, sexual orientation, and gender identity. Diverse allies with The City Project submitted detailed comments, in addition to those highlighted below.

Selected comments:

“It is a known fact that the most disadvantaged in communities around California [bear] the brunt of the health and environmental effects of Climate Change In disadvantaged and economically diverse communities, local politics continue to marginalize and ignore the needs of those less fortunate. . . . The CCC Environmental Justice Policy should be a global standard how we practice the art of humanity. The thread of justice needs to be laced into the ever increasing economic gap between the affluent and the impoverished.” (90.)

“With the effects of Climate Change, for example, extreme temperatures and urban heat zones, the value of coastal property is bound to rise. The more affluent invest and relocate to these coastal areas as part of the climate change migration phenomenon. In contrast, the citizens who have lived, worked and raised their families in these coastal climates are being displaced as a result of the transformation of neighborhoods from a lower to a higher economic value. These circumstances are compounded in areas where most of a community's disadvantaged are elderly or fixed and lower income residents.” (90.)

“Tribal concerns are not being addressed. I have seen speakers from the Northern Chumash tribe speak many times at the Coastal Commission meetings asking for protection of their sites in the Oceano Dunes. Except for fencing a few sites, a comprehensive plan is not in place.” (96.)

“Those who are disadvantaged cannot defend themselves. It is a responsibility of elected and appointed officials, who have the power to protect, to do so.” (99.)

“The Coastal Commission ... does not address the sweeping gentrification that has been experienced by communities within the Coastal Zone, pushing low-income communities and communities of color farther and farther inland away from the coast.” (112.)

“Coastlines near communities of color have often been dedicated to heavy industrial uses that have essentially eliminated the public coast in these areas ... too little is being done to remedy or mitigate this.” (113.)

“A robust and effective Final Policy will help protect ... Latinx communities, who comprise 38.2% of California’s population. Access to no- and low-cost coastal resources is especially important to Latinx communities living farther from the coast — communities who face greater difficulty and incur greater costs accessing them.” (131.)

“The Coastal Commission [should] specifically seek input from groups truly representative of vulnerable or overburdened communities, determined by identifying the geographic area the group represents, if applicable, and examining other indicators such as those provided by CalEnviroScreen, including poverty, linguistic isolation, and housing burdens. None of these actions would exclude groups from contributing to conversations about environmental justice, but would help the Coastal Commission to identify the voices and concerns of groups that are truly representative of overburdened or vulnerable communities.” (135.)

“When planning for the effects of climate change and making decisions that potentially impact coastal access, the Coastal Commission [should] prioritize the protection of “access hotspots.” Access hotspots are areas that provide coastal access to more diverse populations, who are more likely to come from communities facing environmental justice issues.” (138.)

“I commend the Coastal Commission and its staff for moving forward with this essential initiative to improve equity in Commission processes and outcomes. . . . Commission resources may be less accessible or transparent to people in ways that are correlated with attributes such as income, race, religion, culture, national origin, ethnic group, age, or disability status, among other factors.” (252.)

“Because of environmental injustice we are excluded from access and the enjoyment of our beaches, bays and clean ocean waters. Environmental Injustice also has a direct effect on our economic future and the upward mobility of our young people....our future. While the idea of environmental justice is relatively new the principles of environmental justice goes back to the civil rights movement of the 1960’s. . . . Abuse of the Civil Rights Act cases are very hard to prove in a court of law. The reality is that in San Diego there is no white lines running down the middle of San Diego Bay that are visible. Also, there are no written records, phone records or documents which provide a paper trail to prove these groups who live on the left side of the white line conspired to break the law. Also, when as a private citizen, you try to make sense of the all the Government and Non-Governmental Organizations (NGO) who you expect would have a solution to the environmental injustice issue in the South San Diego Bay (San Diego Port District, City of San Diego, City of National City, City of Chula Vista, City of Imperial Beach State Wildlife, Coastal Commission, Wild Coast, Surfrider, The Coastal Conservancy, SWIA, State Parks, TRNERR, USFWS, US Navy, EPA, Border Patrol, County Parks, CA Coastal Conservancy etc.) it really hurts your head and it’s hard to tell who is on what side.” (267-68.)

“[S]ocial and physical barriers can disconnect underserved lower income communities from access to coastal areas. But there are other more subtle informal barriers that discourage public access The Commission should clearly include informal barriers in its policy because these barriers convey the message “you are not welcome here”.” (290-91.)

“The Draft Policy and the text expanding on it should include “incomes” to reflect the law and include all groups. The way the Draft Policy reads now, a low-income person would read it and have no idea that he or she is included as a protected person with equal rights that would be equitably carried out for him or her under these new laws. In reality, both the Government Code and the Coastal Act explicitly include them.” (337.)

“The Commission recognizes the elimination of affordable residential neighborhoods has pushed low-income Californians and communities of color further from the coast, limiting access for communities already facing environmental health disparities. (page 7) Yes, yes, and yes!” (341.)

“I want to challenge the way that we perceive and hold stereotypes about the communities we are discussing. Many times my students are described as at-risk, disadvantaged, low-income, inner-city etc. Most of this language is deficit based focusing on what’s lacking and what’s wrong or what could go wrong. Why not focus on what could go right? I encourage all of us in our work to use asset based language- my students are resilient, creative problem solvers, resourceful, excellent networkers, have potential and just need an invitation and support to engage with something like surfing.” (371.)

“It is clear that the CCC staff heard the Tribe’s concerns for our sacred coastline, access to coastal properties for cultural and spiritual purposes and embraced an open-mindedness to our Traditional Ecological Knowledge. SLR looks forward to continuing to develop a positive and mutually respectful relationship with the CCC. And lastly, the San Luis Rey Band of Mission Indians acknowledges and appreciates the California Coastal Commission in its commitment to protect and preserve our sacred coastline and tribal cultural resources.” (152.)

“In addition to the Commission’s formal tribal notification and consultation policy, the Commission will work collaboratively with tribes on a government- to-government basis to better understand the significance of local and regional cultural concerns, including but not limited to access to and protection of areas of cultural significance, ethnobotanical resources, traditional fishing and gathering areas, and access to and protection of sacred sites.’ Adding this language does two things: 1) it affirms the sovereignty of tribes, whether they are federally recognized or not, and is an important step in helping to overcome the genocidal history that was part of the robbing of California Indians of their nationhood. 2) It affirms their collectivity. CCC EJ policy should acknowledge working with tribes as governments, not with Indians as individuals.” That’s it for now. Great work!” (143.)

Respectfully submitted,

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