



GrassRoots Institute *Mendocino County Vision Workgroup*

October 2, 2023

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The following represents comments of the GrassRoots Institute's Mendocino Vision Workgroup in regard to the City's Draft Community Engagement Plan, California Coastal Commission's Local Coastal Program Grant, (LCP-22-07 signed 04-07-2023).

Recommendation -

The City of Fort Bragg's Draft Community Engagement Plan (CEP) does not satisfy the minimum requirements of the California Coastal Commission's Local Coastal Program Grant Program, nor will it adequately engage the public as meaningful partners in accomplishing the objectives of the LCP Update grant. In summary, the Draft CEP needs to be completely redrafted to correct its deficiencies.

Purpose of CEP -

The Coastal Commission recognizes robust public engagement is critical to the design and implementation of Local Coastal Programs. Therefore, in developing its Local Coastal Program Grants it specified local governments must engage the public in the process. Specifically, the Coastal Commission's approval of the City of Fort Bragg's Noyo Harbor LCP Grant stipulates that as a condition of the Grant, the City will develop a CEP that defines the role of the public in:

"shaping and realizing the [LCP] project,"¹

Thus to meet the requirements of the Grant, the City's Community Engagement Plan must engage the public adequately to ensure that they have a meaningful and

¹ Recommended Round 8 Local Coastal Program (LCP) Local Assistance Grant Awards, W6d, (LCP Grant Program Recommendations), 11-2-22, page 13

substantive role in “shaping and realizing” a successful update to the Local Coastal Program.

The Draft CEP fails to meet this Coastal Commission standard, and substitutes a completely different CEP purpose. According to the City, the purpose of the draft CEP is to provide the public with an:

“understanding of the roles, actions and outcomes of the project.”²

By this standard, all the City has to do is inform the public “of the roles, actions and outcomes of the [LCP] project.”

To clarify the importance of public engagement, and in stark contrast to the City’s stated purpose, the Coastal Commission’s grant application instructions state clearly “public outreach” is a “required component of the grants.” And further, that the City must engage the public early in the process to allow “for review of major deliverables...prior to finalization.”³

The difference between a CEP designed to engage the public in “shaping and realizing” the project and one intended to inform the public with an “understanding” of the project, is so substantive that it demands a complete rewrite of the CEP to correct this fundamental flaw.

Sadly, this is not the only flaw in the draft CEP. In fact, it is riddled with inadequacies and vagaries that demand rectification.

To further that objective, we offer here a detailed assessment of the City’s draft CEP and recommendations for specific improvements that should become elements of a redrafted CEP in order to not only meet the Coastal Commissions intended purposes, but also satisfy the public’s need for an equitable role in updating the LCP.

Draft CEP’s Scope Too Narrow -

Page 3 thru 6 of the Draft CEP describes the purpose of the engagement plan is to facilitate public and stakeholder participation to develop the Blue Economy Visioning Resiliency Implementation Plan (BEVRI).⁴ But the grant funding agreement with the Coastal Commission specifies the “BEVRI” is only one component in the LCP project. It also specifies that public outreach and engagement must be part of **all** project components from start to finish.

² City of Fort Bragg News Release, 9-12-23,

³ California LCP Grant Application Form, Application Materials, Program Description, Task Discription, page 3

⁴ Draft Communication And Engagement Plan, page 3, 9-12-2023

According to the Coastal Commission, the purpose of the LCP grant program is to:

“support local governments developing new or amending existing Local Coastal Programs (LCPs) pursuant to the California Coastal Act. Funds will be used for projects that are designed to assist local governments in assessing impacts and planning for coastal resiliency, including adapting to the impacts of climate change and sea level rise, and which contain an LCP planning component.”⁵

Therefore, the draft CEP must be rewritten to ensure the public is engage in shaping and realizing all elements of the LCP Update project, including:

- Development and inclusion of timely, effective, equitable opportunities with broad based public participation in the project from start to finish. That includes public education regarding Sea Level Rise and Climate Change Impacts, the implications of those impacts on Local Coastal Programs, public involvement and comment on all project deliverables, and inclusion in the public record of all documented public comments as well as written responses to public comments.
- The public must be included in the management, planning, and project decision making from project beginning to end. This will require complete transparency to the public in regard to all project activities, decision making and fiscal reporting.
- Enable public involvement in all technical studies required to inform the LCP update project. This should begin by encouraging early public involvement reviewing draft descriptions detailing the scale, scope and content of technical studies as well as all specifications for Request For Proposal solicitations.
- Integrate full public participation in the development of the Blue Economy Visioning Resiliency and Implementation Plan - including recording and reporting all public perspectives and commentary regarding the development and articulation of the plan.
- Engaging the public in the City’s and the County’s Local Coastal Program Update development throughout the process. The CEP should function as a project

⁵ Recommended Round 8 Local Coastal Program (LCP) Local Assistance Grant Awards, W6d, (LCP Grant Program Recommendations), 11-2-22, page 1

charter to ensure LCP amendments reflect public objectives for coastal zone management going forward.⁶

Redraft the CEP to embrace opportunities for public engagement in accomplishing all the project tasks and deliverables -

Pages 4 thru 6 of the Draft CEP makes a case that development of the Blue Economy Visioning Resiliency (BEVRI) Plan is a vital component in assuring a vital harbor economy. But the BEVRI Plan is only one of several deliverables specified in the LCP project agreement, and in fact a blue economy may not even be viable given the devastating impacts of sea level rise, climate change, storm surge hazards, flooding, etc, on the harbor and the fisheries it depends upon. The description in the draft CEP presumes that the harbor has a bright blue economy future as a hub for tourism and fishing even before sea level rise, climate change, hazard, and aquaculture assessments are completed. While its inconvenient, prudence dictates no presumptions should be made about the wisdom of pursuing a “Blue Economy” future for the harbor until after all project studies have been completed and the science and data demonstrate the viability of such an approach.

It’s erroneous to build into the CEP a presumption that science and credible data already demonstrate a Blue Economy harbor strategy is in the best interest of the public. It is erroneous to presume a public consensus exists that embraces a “Blue Economy” solution for the harbor - both of these assumptions are false at this time.

There is no need for the extensive description of the BEVRI plan in the CEP. As a description of the project, it fails because it not only misleading as to the scale and scope of the LCP Update project, but more importantly it neglects to describe the full range of public engagement opportunities the CEP is required to address.

Worse, the description misdirects the public into thinking there is already public buy-in and agreement that a BEVRI is a viable economic and environmental harbor solution. In fact there is no such public agreement about a Blue Economy solution for the harbor.

We recommend striking this section and in its place the CEP should include a description of all four of the LCP Update Project Tasks as background to inform the public about the full scope of the project and outline the numerous opportunities for the public to become engaged as the project is undertaken.

For example, the CEP could provide a brief description of Task 1 in the LCP agreement that defines the role of the City’s obligations administering and carrying out the tasks

⁶ California Coastal Commission Standard Grant Agreement #LCP-22-07, signed 4-7-23, Exhibit A Scope of Work, page 8

identified in the grant. It could also describe the role of the Noyo Harbor District in the grant process, as well as the responsibilities of the Coastal Commission staff overseeing the grant project. There could be a description of how the City intends to insure the administration of the grant is accomplished in a transparent fashion that engages and informs public comment about the project's planning and administration. It could clarify how engagement and participation by the public and stakeholders will be managed to ensure a balanced, open and inclusive project process.⁷

The CEP should describe public engagement and outreach activities associated with the major grant tasks. Likewise, the description should be linked to specific public outreach and engagement activities, which are directly tied to each of the sub-tasks and deliverables to be accomplished.

Here is a list of major tasks detailed in the grant agreement:

Task 1 - Project Management

Task 2 - Equitable Outreach and Coordination

Task 3 - Noyo Harbor Blue Economy Plan

Task 4 - Local Coastal Program Amendment

Redrafting this section of the CEP to define all four tasks and highlighting how public engagement shaping and defining project deliverables will be accomplished, should be a simple task since task, goals and objectives are already detailed in the City's LCP agreement with the Coastal Commission.⁸

Community Collaboration in Building the BEVRI Plan -

Pages 7 thru 12 of the Draft CEP outline a strategy for community collaboration. But again this section of the Draft CEP focuses exclusively on the BEVRI and ignores the fact that development of the BEVRI plan is only part of the LCP grant approved by the Coastal Commission. It fails to provide a workable strategy for meaningful engagement, participation and contribution by the public and stakeholders in crafting the other deliverables required in the LCP grant.

The strategy outlined in the Draft CEP states:

⁷ Early public engagement could have benefited the project's management. For example, if the City had engaged the public about its decision to host the Draft CEP on the Noyo Ocean Collective webpage for purposes of public review, it would have heard doing would cause public confusion about where to find and comment on the Draft CEP.

⁸ California Coastal Commission Standard Grant Agreement #LCP-22-07, signed 4-7-23, Exhibit A Scope of Work, pages 2 thru 8

“Our goal is to empower our local community to guide, build, and implement the BEVRI Plan in order to improve local livelihoods, strengthen our ability to adapt to future changes, and support healthy coastal and ocean eco systems.”

This goal falls far short of what is required by the LCP grant’s provisions, because it narrowly confines the focus of the CEP to development of the BEVRI plan. This is a gross distortion of the requirements specified in the grant contract.

The grant contract directs the the City to complete four major task and numerous subtasks, all of which should incorporate public outreach and engagement. Specifically the tasks are:

I. Task 1: Project Initiation and Management⁹

A. Task 1.1: Project Initiation

- 1. Task 1.1.1: Prepare RFP and secure professional services from qualified consultant to assist the City in completing the identified technical reports and studies.***

B. Task 1.2: Grant Administration

- 1. Task 1.2.1: The City’s Grants Coordinator will process and track invoices and submit quarterly reports.***

C. Project Management

- 1. Task 1.3.1: Project coordination and implementation will be managed by Special Projects Manager Sara McCormick with the assistance of the Noyo Harbormaster, Anna Neumann.¹⁰***

A proper CEP would establish opportunities for the public to engage and inform project management decision making. Specifically, it would open up opportunities to increase transparency to the public regarding the management of the grant. Transparency is an important element of inclusion and building public project ownership. It should start with the Project Manager Sara McCormick and Harbormaster Anna Neumann holding monthly public meetings to review their progress managing the roll out and completion of grant deliverables. For example, at such a meeting the public could review and suggest improvements to drafts of the Request For Proposals to secure expert professional consultant assistance. And of course these meetings should be hybrid meetings that encourage in person and zoom participation with the largest possible public attendance possible.

⁹ City of Fort Bragg, LCP- 22-07, Exhibit A, page 2

¹⁰ Note there is no mention in the LCP grant agreement of the Noyo Ocean Collective producing any of the Task 1 deliverables.

To date, the City and the Harbormaster have not included the broader general public in the early design and implementation stages of the project. This is a major flaw that needs to be corrected.

Too Large a Role for Noyo Ocean Collective -

The draft CEP proposes creation of a small planning team¹¹ utilizing the Noyo Ocean Collective to counsel and guide grant activities. This scenario relies on the false proposition that the Noyo Ocean Collective is representative of stakeholders and the broader public interest.

A better approach and one consistent with the Coastal Commission's intent to fully engage the public would be for the City and Harbormaster to hold monthly public meetings to solicit broad public input in regard to planning, management and fiscal decision making needed to accomplish the objectives of the project.

II. Task 2: Equitable Outreach and Coordination through all Tasks¹²

A. Task 2.1: Agency Coordination

- 1. Task 2.1.1: The proposed project will provide an opportunity for the City, County and Harbor to partner on climate resilience strategy for the Noyo Harbor. The proposed project will not only result in a LCP update for the City of Fort Bragg, but also inform Mendocino County's LCP update concerning allowable land uses and policies for the zoning designation, Fishing Village.**
- 2. Task 2.1.2: The City's Local Coastal Program represents a unique partnership with the State, and the City is committed to upholding the Coastal Act and incorporating CCC staff in the process leading up to LCP update and throughout the certification process.**
- 3. Task 2.1.3: The US Army Corps of Engineers conducts regular maintenance dredging and the dredging spoils are stored near the mouth of the river. This project will engaged with the Corps to evaluate existing dredging schedule, needs, and reconsider disposal plan in response to sea level rise assessment.**

B. Task 2.2: Noyo Ocean Collective

¹¹ Draft CEP 9-12-23, page 7

¹² City of Fort Bragg LCP-22-07 Exhibit A page 3

1. ***Task 2.2.1: The City of Fort Bragg, Noyo Harbor District, Sherwood Valley Band of Pomo, Mendocino College, Mendocino County, and Noyo Center for Marine Science have formed a regional partnership, coined the Noyo Ocean Collective. The intent of the group is to coordinate communication about blue economy strategy to community; share resources and partner on grant proposals, and align individual organizations' work plans to implement blue economy initiatives.***¹³

The grant agreement language is clear, all the LCP grant authorizes is “coordination” with stakeholders such as the Noyo Ocean Collective.

In contrast to the Draft CEP that focuses almost entirely on the blue economy, the LCP grant agreement encompasses several grant project deliverables, all of which require public engagement to be attained successfully.

Unlike the Draft CEP, the LCP Update agreement’s primary emphasis is on assessing the impacts of climate change and updating LCP requirements to reflect the realities of climate change on land use regulation in the harbor going forward. Making the primary focus of the CEP development of a blue economy strategy is a clear demonstration of a distortion of the LCP grant’s purpose as proscribed by the Coastal Commission and must be corrected.

It is also important to note that the language of the LCP’s Task 2 specifically demands that the CEP insure “equitable outreach and coordination through **all** tasks.” In agreeing to the requirements of the LCP grant’s Task 2, the City specifically agreed that:

“Outreach and coordination efforts will continue with those actively engaged, while simultaneously conducting further communication and engagement to attract additional perspectives and amplify marginalized voices.”¹⁴

Yet the Draft CEP fails because it delegates to the Noyo Ocean Collective a disproportionate role in planning and communication for the project, giving its members an oversized voice in the projects decision making and implementation. This is in direct contradiction to what the City agreed to do in regard to outreach that expands public participation to add additional perspectives and amplify marginalized voices. It is important to recognize that while the Noyo Ocean Collective’s members share a financial interest in developing a blue economy based in Noyo Harbor, it is an organization composed of government and private non-profit entities and does not represent a broad cross section of the public and certainly is not largely composed of marginalized voices.

¹³ This language acknowledges the Noyo Ocean Collective’s as stakeholders with an economic interest in the harbor and recognizes the value of communication with them in developing a “blue economy” strategy. It does not license them to speak for the general public or authorize the Collective to coordinate the public engagement required in the LCP agreement.

¹⁴ City of Fort Bragg LCP-22-07, Exhibit A page 3

C. Task 2.3: Community & Stakeholder Communication and Engagement¹⁵

- 1. Task 2.3.1: Personal Interviews**
- 2. Task 2.3.2: Social Media Posts**
- 3. Task 2.3.3: Tabling at Community Events or Pop-Up Events**
- 4. Task 2.3.4: Workshops**
- 5. Task 2.3.5: Public Meetings before Decision Makers**

The Draft CEP incorporates a commitment to perform all of the subtasks specified in Task 2.3 of the grant agreement, but to fully meet the requirements of the grant agreement, the City's CEP must articulate an actionable plan to fully actualize these activities across all tasks (not just in regard to a blue economy component). In order to be an actionable plan, the CEP needs a timeline schedule detailing who, what, when, and where required outreach activities will be undertaken. The Draft CEP fails to meet this standard. The Draft CEP provides no specific dates for the public workshops or what will be accomplished at those workshops to further the objectives of empowering the public to shape the project and define its outcomes.

Rather than providing the public with a detailed timeline/workplan with clearly specified dates when outreach and engagement activities will occur, the Draft CEP provides only an ill defined "Timeline for Community Involvement in Building BEVRI Plan and Updating Local Coastal Programs."¹⁶ The Draft CEP's timeline lacks any real specificity in regard to who, what, when and where actual public & stakeholder outreach and engagement will occur and instead references general outreach tasks tied to three month seasonal periods. While this level of plan specificity might have been appropriate at the LCP Update **application** stage for Coastal Commission consideration in 2022, it is grossly inadequate a year later and six months after the City's LCP grant was signed.

The scope of the community involvement time line provided in the Draft CEP also fails, because it only addresses community involvement in preparing the BEVRI plan as the foundation for updating the County of Mendocino's LCP for the harbor. The timeline incorporates only superficial references to the other major components of the LCP grant - i.e, developing RFPs to procure expertise to prepare technical studies of climate change impacts, harbor hazards, parcel inventory, harbor facilities assessment, blue economy opportunities & limitations, and aquaculture feasibility, etc.¹⁷ In fact, the only

¹⁵ City of Fort Bragg, LCP-22-07, Exhibit A page 4

¹⁶ Draft CEP For The Noyo Harbor Blue Economy + Visioning Resiliency Implementation Plan, September 12, 2023, prepared by Jocelyn Enevoldsen, Coastal Communities Program Director, JP Consulting, & Anna Neumann, Harbormaster, Noyo Harbor, & Sarah McCormick, Special Projects Manager, City of Fort Bragg, page 16

¹⁷ City of Fort Bragg, Draft CEP, 9-12-23, page 18

reference to public engagement and outreach relative to these critical elements of the LCP Update is in the last sentence of the Draft CEP:

“Studies will be presented to the public as they are completed, and compiled on the project website (www.NoyoOceanCollective.org).”¹⁸

How can the public have any engagement or role in shaping these foundational studies, if they are already finalized? Clearly, this is yet another example of a complete failure of the Draft CEP to provide the comprehensive public engagement from start to finish in shaping the projects outcomes, demanded by the LCP agreement.

III. Task 3: Noyo Harbor Blue Economy Visioning, Resiliency, and Implementation Plan - Comprehensive baseline information about the existing environmental, physical, and economic conditions of Noyo Harbor is needed in order to prepare this area for a changing climate and position the harbor for blue economy investment. This task will gather appropriate existing information about the harbor to support the development of the Blue Economy Visioning Resiliency, and Implementation Plan.¹⁹

A. Task 3.1: Harbor Improvements and Blue Economy Opportunity Identification

- 1. Task 3.1.1: Site-specific analysis of the scenarios and impact of sea level rise, tsunami hazards, and increased erosion due to increased wave action within the harbor to mitigate expected sea level rise and inform future development considerations. This analysis will use the best available science, consider sea level rise for the time scales associated with the expected life of development considered in the Harbor Blue Economy Visioning Resiliency, and Implementation Plan, and will use the County of Mendocino’s Round 8 LCP grant sea level rise analysis as appropriate. This analysis will be used to identify opportunities and limitations for proposed development, infrastructure needs, and adaptation needs in the harbor***
- 2. Task 3.1.2: Parcel inventory to identify current land use(s), economic contribution, boundaries, and historic status. Space within the harbor is limited, and a comprehensive review of existing development is needed to inform strategy for increasing overall productivity.***
- 3. Task 3.1.3: Harbor facilities conditions assessment to inform the planning effort, including inspections to assess and document the present condition of facilities and remaining life. The effort includes***

¹⁸ City of Fort Bragg, Draft CEP 9-12-23, page 19

¹⁹ City of Fort Bragg, LCP-22-07, Exhibit A pages 6 to 7

data review, interviews with Harbor District Management, City and County Officials and marina users to gather understanding of any chronic maintenance needs, operational issues or concerns, and development of a targeted scope of the conditions assessment on key facilities. The assessment is expected to focus on structural integrity, mooring basin analysis including size, vessel type, term of lease, condition of docks, etc., in order to maximize use and benefit to the local economy. The assessment will also identify needed harbor improvement/projects and provide repair and replacement costs.

- 4. Task 3.1.4: Technical studies including an aquaculture feasibility study that incorporates a water quality assessment and considers future climate impacts on potential aquaculture operations; and an analysis of special district management of the harbor.***
- 5. Task 3.1.5: Identify opportunities and limitations of the harbor's transition to blue economy uses; adaptation and resilience measures based on the site-specific sea level rise and hazard assessment; a suite of potential projects to pursue in and around Noyo Harbor; and potential partners and funding resources.***
- 6. Task 3.1.6: Conduct public outreach on the Draft Noyo Harbor Blue Economy Visioning Resilience and Implementation Plan consistent with the Communication Engagement Plan.***

In regard to Task 3 (Blue Economy Visioning Resiliency Implementation Plan), the Draft CEP articulation of what the City proposes to do in regard to the LCP grant project is at least expansive, if not informative as to meaningful public engagement shaping the BEVRI Plan. But again, this springs from a distortion by the City of what the CEP is suppose to accomplish. As noted earlier, rather than meet the standard set in the grant agreement of enabling the public to “shape and realize” the objectives of the grant,²⁰ the Draft CEP substitutes a standard of informing the public of studies and information after they are finalized.²¹ Or as stated in the City’s Draft CEP Press Release, it only provides the public an “understanding” of the project.²² Thus even the City’s disproportionate focus on development of the blue economy plan for the harbor (all but two pages of the

²⁰ Cal. Coastal Commission W6d (LCP Grant Program Recommendations) November 2022, page 13

²¹ Draft CEP For The Noyo Harbor Blue Economy + Visioning Resiliency Implementation Plan, September 12, 2023, prepared by Jocelyn Enevoldsen, Coastal Communities Program Director, JP Consulting, & Anna Neumann, Harbormaster, Noyo Harbor, & Sarah McCormick, Special Projects Manager, City of Fort Bragg, page 19

²² City of Fort Bragg News Release, 9-12-23,

19 page Draft CEP focus on developing the BEVRI plan) the engagement plan falls short of the standard set in the LCP agreement with the Coastal Commission.

In fact, instead of engaging the public in shaping and realizing a blue economy plan for the harbor reconciled to the realities of climate change, the Draft CEP largely empowers the Noyo Ocean Collective to lead development of a harbor blue economy plan.

The Draft CEP states that it will use a “team approach” for implementation of the CEP. It goes on to state public engagement will be directed by a “Planning Team” composed of the City of Fort Bragg, Noyo Harbor District, the Noyo Ocean Collective and the California Sea Grant.²³ The planning team will be assisted by a “Community Outreach Team” composed of community members who have established connections within different community groups in the region. Together, the teams will coordinate, advertise, participate in and report out about BEVRI community outreach events.

This approach leans disproportionately on a narrow group of stakeholders with economic investments in the harbor who would benefit from expanding its economy. And while, that input and participation has value in development of a blue economy plan, their input needs to be balanced by the larger public interests of environmentalists, tourists, city and regional residents, seniors, naturalists, low income and marginalized communities, which are not reflected in the Noyo Ocean Collective or the California Sea Grant organizations. And while the Draft CEP plans to do outreach, its unclear how that outreach will actually allow the broader public to shape and realize the LCP project’s objectives.

What is sorely missing from the BEVRI is a commitment to at least monthly public meetings (noticed at least two weeks in advance) where the Special Project Manager and the Harbormaster present status reports in writing to the public of all activities completed, underway, or planned to be accomplished covering all the tasks specified in the LCP grant agreement. Further, written agendas detailing the items to be presented, discussed and acted upon at these public meetings should be provided two weeks in advance to allow the public to prepare for their participation in the meetings.²⁴ Such public meetings should be “hybrid” meetings allowing for in person attendance as well as participation by zoom. The City has this capacity since it utilizes it for various city meetings already.

Such meetings are a traditional mechanism embedded in Mendocino Coast culture and are the means the public is most comfortable with and acclimated too, in regard to public decision making.

²³ Draft CEP For The Noyo Harbor Blue Economy + Visioning Resiliency Implementation Plan, September 12, 2023, prepared by Jocelyn Enevoldsen, Coastal Communities Program Director, JP Consulting, & Anna Neumann, Harbormaster, Noyo Harbor, & Sarah McCormick, Special Projects Manager, City of Fort Bragg, page 7

²⁴ This also serves as a public record of engagement activities demonstrating fulfillment of the LCP agreement provisions.

To ensure qualitative engagement, the City (not the Noyo Ocean Collective) should host a webpage where all pertinent documents can be viewed, where meetings are calendared in advance and where meeting agendas & pertinent documents are posted for the public to access.

It's important that it be on the City's website and not the Noyo Ocean Collective's website because it's the City's ultimate responsibility to carry out the provisions of the grant project. It is also where the public expects LCP information to be made available.

The Draft CEP Fails To Provide A Meaningful Public Engagement Workplan for Updating Local Coastal Programs -

The final and most important element of the Commission's grant is successful amendment of the City's and the County's Local Coastal Programs to reflect the unique impacts of climate change on the use and regulation of the harbor's coastal zone.

In contrast to the intended community engagement emphasis of the grant, since the grant was signed in April 2022 the City has failed to conduct even a single major public meeting to focus on initiating a broad based public discussion to shape and realize the objectives of the project. This is an omission that must be corrected immediately and not repeated going forward.

IV. Task 4: Local Coastal Program Amendment - LCP Grant Program funding will not only result in a update to the City's LCP, but will also inform Mendocino County's LCP update related to land classifications within the Fishing Village zoning designation. Likewise, the County's LCP Grant Program application identifies a sea level rise vulnerability assessment that encompasses the entirety of the County's coastline, including the coastline of Fort Bragg. The City will consider and incorporate into LCP planning and policies as relevant and appropriate the findings from Mendocino's Round 8 LCP Grant work related to sea level rise and Noyo Harbor.

A. Task 4.1: Coordination with Mendocino County²⁵

- 1. Task 4.1.1: Incorporate joint City/County outreach efforts into the CEP, including public workshops and meetings with relevant stakeholders and decision makers.***
- 2. Task 4.1.2: Incorporate Mendocino County LCP planning findings (as relevant and appropriate) related to sea level rise and Noyo Harbor.***

²⁵ City of Fort Bragg, LCP-22-07, Exhibit A pages 7 to 8

3. **Task 4.1.3: Present final Noyo Harbor report and City LCP amendment to Mendocino County Board of Supervisors at a public meeting.**

B. Task 4.2: Coordination with California Coastal Commission Staff

1. **Task 4.2.1: Incorporate sea level rise policies (at a minimum including baseline SLR policies of the type described by the Local Government SLR Working Group).**
2. **Task 4.2.2: Prepare draft LCP Amendment to incorporate findings of Noyo Harbor Visioning Resiliency and Implementation Plan.²⁶**
3. **Task 4.2.3: Public outreach and comment on draft LCPA**
4. **Task 4.2.4: Revised LCP Amendment (LCPA) to incorporate comments from Commission staff and public**
5. **Task 4.2.5: Local Adoption of LCP Amendment**
6. **Task 4.2.6: Submit LCP Amendment to Coastal Commission**

C. Task 4.3: Public Outreach and Engagement

1. **Task 4.3.1 CEP will function as project charter to ensure Noyo Harbor report reflects community objectives as it is the community that will be implementing recommendations and future projects.**

It is hard to imagine that the Coastal Commission direction under the agreement could be more clear about the minimal requirements that the Draft CEP needs to meet, and yet somehow the City seems to have completely ignored the agreement in preparing the Draft CEP.

It must be noted that of the 19 pages in the Draft CEP only one and a half pages are devoted to discussing community engagement directly related to the LCP Update Amendment.²⁷ Sadly those one and a half pages are wasted providing absolutely no plan for actually accomplishing the objectives detailed in the grant agreement (Task 4 Local Coastal Program Amendment as noted previously).

This represents a major failure on the City's part, wasting public time/resources and then failing to do what the LCP agreement clearly requires. One can only hope that the

²⁶ It is important to note that "Blue Economy" was rightly left out of the task description. This is not an omission but rightly asserts that developing a blue economy in the harbor is only one possible outcome for the harbor.

²⁷ Draft CEP For The Noyo Harbor Blue Economy + Visioning Resiliency Implementation Plan, September 12, 2023, prepared by Jocelyn Enevoldsen, Coastal Communities Program Director, JP Consulting, & Anna Neumann, Harbormaster, Noyo Harbor, & Sarah McCormick, Special Projects Manager, City of Fort Bragg, page 17 & 18

Commission has the good sense to deny any payment for expenses incurred producing such rubbish.

Summary, Conclusions & Final Comments -

For all the reasons cited and more that others might add, the City's Draft CEP should be rejected and rewritten. It completely fails to meet the requirements set forth under the terms of the City's agreement with the California Coastal Commission to produce a Local Coast Program Update Amendment that reflects the realities of climate change's impact on Noyo Harbor.

In this assessment, we have detailed numerous failings of the Draft CEP. The following highlights some of the more significant deficiencies and suggests corrective action:

1. The Draft CEP fails by focusing almost exclusively on only one aspect of the LCP Update project - Development of a Blue Economy Plan. The LCP Grant demands that the CEP provide a comprehensive roadmap for the public to **shape and realize all** the objectives detailed in the agreement.
2. The Draft CEP attempts to delegate to the Noyo Ocean Collective, duties and responsibilities the LCP specifically designates to the City and the Harbormaster to perform. The Noyo Ocean Collective is a relatively new entity that primarily represents stakeholders with economic interests in the harbor - it is a conflict of interest to give this body public duties that could directly benefit their economic interest.
3. The Draft CEP fails to provide any meaningful pathways for the public to shape and realize the objective of Task 1 in the agreement - open, transparent, efficient, effective management and administration of the grant project. At a minimum, the City and Harbor master should host public meetings monthly to provide a written status report to the public on progress accomplishing grant objectives, such meetings should be noticed in the local media two weeks in advance and provide a meeting agenda (listing action items for discussion) posted on the City's website. Such public meetings should be hybrid providing both in person and internet access participation. Further, the City should create a webpage on the City's website, devoted exclusively to providing information to the public about the LCP grant project and alerting the public to opportunities to shape and realize all of the projects objectives.
4. The Draft CEP was prepared without broad based public engagement, and as a result it fails to satisfy Coastal Commission requirements or the public's need for engagement. More importantly, shifting responsibility for hosting public engagement to a third party website (Noyo Ocean Collective) just adds additional

obstacles to effective broad based public awareness and engagement. The City should create a Noyo Harbor LCP Update webpage on the City's website to provide a space for distributing pertinent information to the public, posting public comment and providing a single point of contact to obtain information or to contact responsible officials.

5. The Draft CEP fails because it does not provide a workable pathway for meaningful broad based public engagement from start to finish. The timeline is uselessly vague, providing little information about what opportunities for public engagement are planned, when they will occur, how the public can participate, or who to contact for specific information. The LCP agreement provides a detailed time line for when the grant project deliverables are to start and when they are to be completed. The City and the Harbormaster should construct a public engagement workplan for each of those deliverables that ensures the public can participate in all phases of the grant project's completion.
6. A blue economy should not be presumed to be a viable solution for adverse impacts of climate change on the harbor. In particular, there is already significant evidence that the adverse impacts of climate change may necessitate planned retreat from existing commercial and recreational uses of the harbor over time. The planing and development process for producing the BEVRI plan must include and recognize dissenting public views from all sides about the utility of pursuing a blue economy in the harbor.
7. The Draft CEP is particularly deficient in providing any meaningful workplan for public engagement in the design and conduct of the studies specified to be conducted as part of LCP grant. This needs to be corrected by opening up for public discussion the design, scaling, scoping and work descriptions for the studies and for the RFPs to be used to recruit consultants to prepare the studies.
8. Similarly, the Draft CEP is woefully deficient in detailing a workable and detailed timeline with date specific public events, workshops that allow the public to become informed about the grant project, and empower the public to shape and realize the objectives of the LCP amendments to be actualized.

Thank you for the opportunity to comment on the Draft CEP. I will forward copies of this assessment to the Coastal Commission as well as make it available to the public and media thru the GrassRoots Institute's Mendocino Vision Workgroup's webpage. - <https://www.grassroots-institute.org/vision>

Sincerely,

Peter McNamee

On Behalf of the GrassRoots Institute's Mendocino Vision Workgroup,

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