



CITY of CARPINTERIA, CALIFORNIA

June 15, 2020

Board of Supervisors
County of Santa Barbara
c/o The Clerk of the Board
105 East Anapamu Street, Room 407
Santa Barbara, CA 93101

**Re: Proposed Final Subsequent Environmental Impact Report
Updated Carpinteria Salt Marsh Enhancement Plan**

The City of Carpinteria ("City") has reviewed the Proposed Final Subsequent Environmental Impact Report ("SEIR") for the update to the Carpinteria Salt Marsh Enhancement Plan ("Plan" and "Plan Update"). The City appreciates the opportunity to comment and requests the following concerns and recommendations be addressed before the Plan Update is adopted.

I. PROJECT DESCRIPTION

The SEIR proposes surf zone disposal of Carpinteria Salt Marsh ("Marsh") sediments at Carpinteria City Beach ("City Beach"). This Plan Update component, although included as a potential option in the existing Plan and Final EIR, was never implemented because "sediment testing from Franklin and Santa Monica Creeks has indicated that grain size has been too fine to meet the standards for 'beach quality material.'" (SEIR at 1-2.) The regulatory permits issued by the Central Coast Regional Water Quality Control Board (Certification no. 34214WQ18), California Department of Fish and Wildlife (LSAA no. 160020160210R5), and the California Coastal Commission (Coastal Development Permit 4-14-0492) must be amended to authorize the surf zone disposal of sediment. (SEIR at 4-8.) In addition, as is discussed below, City permits will be required for the trucking operations contemplated in the SEIR.

Trucking of sediments to the terminus of the City's Ash Avenue is proposed to occur subsequent to drag-line desilting at upper Franklin and Santa Monica Creeks, and excavation in the southern portion of the Marsh to re-establish tidal channels. The drag-line desilting operations will be accommodated with an enlarged Franklin Creek Staging Area (additional 0.5 acre), where stockpiling and dewatering of sediment will occur prior to trucking to the surf zone for disposal. (SEIR 4-2; 4-13; 4-15; 5.9-2; 5.10-3.)

The SEIR proposes dewatered sediment to be loaded from stockpile locations into trucks by wheeled loaders and/or tracked excavators, with an average truck load of about 10 cubic yards. "Based on truck queuing logistics at the Ash Avenue disposal site, a maximum of 1,500 to 2,000 cubic yards per day of sediment would be disposed in the surf zone, or about 150 to 200 truck trips per day." (SEIR at 2-3 [emphasis added].) Sediment disposal may be conducted up to 10 hours per day ("typically 7 a.m. to 5 p.m."), five days a week. (SEIR at 2-4.) The "Sediment Disposal Truck Route Map" at Figure 4-2 illustrates the route through the City, which would be used by both full inbound and empty outbound trucks: "Trucks would use existing access roads within the Marsh and exit onto Carpinteria Avenue from Estero Way or Sandyland Cove Road, follow Carpinteria Avenue east, then right on 7th Street, right (south) on Linden Avenue, then right (west) on Sandyland Road to its intersection with Ash

Avenue.” (SEIR at 4-2, 4-5.) The County’s proposed route is also provided and incorporated herein as Attachment “A” to this letter.

“Queuing of trucks and disposal of sediment at the terminus of Ash Avenue would temporarily preclude the use of about 100 linear feet of beachfront and may disrupt parking of beach users.” (SEIR at 5.9-2.) The SEIR does not note that the disposal operation, when active, precludes access to all County beach areas west of Ash to the mouth of the Salt Marsh, or about 700 linear feet of beach. Four on-site workers would be needed for sediment loading and unloading/dispersal, including a foreman and three equipment operators. Additionally, District staff would inspect sediment loading and disposal on a daily basis. Overall personnel requirements would be virtually the same as used for upland disposal of sediment as currently practiced. (SEIR at 4-7.)

The SEIR also proposes diesel-generated hydraulic dredging, in lieu of and as an alternative to desilting. Such dredging could occur along the entire length of all major channels in the Marsh (Franklin Creek, Santa Monica Creek, Main Channel); subsequent surf zone disposal is required. (SEIR at 2-4 to 2-7.) The hydraulic dredging is proposed to stagger years with drag-line desilting or other hydraulic dredging accomplished in different areas.¹ Alternatively, hydraulic dredging of Upper Franklin and Santa Monica Creeks (upper desilting area) with Lower Franklin Creek and the Main Channel (lower desilting area) can be conducted simultaneously as a single task. (SEIR 4-12.) Drag-line desilting is proposed to occur from September to February, with surf zone disposal from October to February. Hydraulic dredging, regardless of location, will occur from September to March.

II. THE CITY ENCOURAGES ADOPTION OF A PREFERENCE FOR ELECTRIC HYDRAULIC DREDGING, WHICH WILL LESSEN FURTHER TRUCKING IMPACTS TO ALREADY DETERIORATED CITY STREETS, REDUCE OR ELIMINATE THE NEED TO ENLARGE THE FRANKLIN CREEK STAGING AREA, AND REDUCE PROJECT IMPACTS TO COASTAL ACCESS AND RECREATION.

A. Hydraulic Dredging Should be the Preferred Method of Sediment Removal.

The City recognizes the need to use desilting, dewatering, and trucking in combination with hydraulic dredging; however, it recommends that hydraulic dredging should be preferred, with desilting, dewatering, and trucking only employed conservatively for moving coarser sediments out of the debris basin for the reasons described herein. Moreover, City encourages use of an *electric* hydraulic dredge in place of the proposed diesel dredge in order to preserve air quality and reduce noise impacts.

B. Deteriorated City Infrastructure Necessitate a Proposed Alternate Trucking Route with Deposit at the Terminus of Sandyland Cove Road.

The trucking route proposed in the SEIR is identical to that employed in other debris clean-outs that have occurred since the Thomas Fire and subsequent mudslides that required beach disposal at the Ash Avenue terminus. As a result, these streets have already sustained substantial deterioration and are unable to handle the oversized loads described in the SEIR without significant further damage.

The SEIR wrongly assumes City streets can handle the truck trips without damage. The SEIR’s vibration analysis does not consider roadway impacts in concluding that structural damage will not occur with trucking, instead focusing only on potential impacts to older residential buildings along the roadway. (SEIR 2-32.) Hence, there are no mitigation measures anywhere in the SEIR that address the inevitable further damage to City streets that will result from the Project and future routine maintenance.

¹ For example, hydraulic dredging of lower Franklin Creek and the Main Channel would not be conducted in the same year as hydraulic dredging of upper Franklin and Santa Monica Creeks. (SEIR at 4-10.)

As such, the City proposes that: (1) electric hydraulic dredging be used whenever possible, and (2) where trucking is necessary, the truck route be changed to use the south end of Sandyland Cove Road. The City's recommended alternate routes for both dredging and trucking, which it believes are the most efficient, are illustrated in Attachment "B" which is attached to and incorporated in this letter. These are a direct route to the beach and are *significantly* shorter than those proposed in the SEIR. In particular, the City estimates that its trucking route would reduce truck travel by over 65%, thereby minimizing trucking costs, air pollution, City street damage and the necessary related pavement repair costs, residential and business disturbances, and aesthetic and community impacts.

If trucking is intended for long-term routine maintenance, infrastructure improvements necessary to use the entire length of Sandyland Cove Road, if any, should be implemented; for example, reconstructing the roads with a cross-section sufficient to handle the frequency of heavy loads. The City should not have to bear costs for significant street wear-and-tear resulting from trucking activities to maintain Flood Control facilities.

C. Primary Use of Hydraulic Dredging Would Reduce or Eliminate Environmental Impacts Associated with the Need to Enlarge the Franklin Creek Staging Area.

The City recommends emphasized use of hydraulic dredging, rather than desilting, dewatering, and trucking because of its reduced impact to the City's infrastructure and economy, as well as to beach access. The SEIR already calls for increased use of hydraulic dredging as a preferred method of sediment removal in areas formerly drag-line desilted, and even goes so far as to propose hydraulic dredging along the entire length of the major Marsh channels to respond to significant reductions in capacity of these channels. Therefore, City's proposal appears entirely feasible.

Hydraulic dredging has the added benefit of minimizing the need to store and process material in the middle of wetland, thereby reducing or even eliminating the need to enlarge the Franklin Creek Staging Area and increase impacts to biological resources and loss of coastal salt marsh associated with providing a stockpile area.

Finally, the City recommends use of an electrically motored hydraulic dredge. While this alternative to a diesel powered dredge is not explored in the FEIR or SEIR, City urges this option be weighed and considered in the interests of mitigating diesel particulate matter generated within the Marsh, where the dredging activity will occur. (SEIR 6-15.) There are augmented long-term benefits flowing from the acquisition and use of an electric dredge if County envisions hydraulic dredging for future long-term maintenance activities.

D. The Plan Update Should Reduce Reliance on Trucking and/or Adopt an Alternative Trucking Route to Lessen Impacts to Coastal Access and Recreation.

The Coastal Act sections 30210 and 30211 mandate that maximum public access and recreational opportunities be provided and that development not interfere with the public's right to access the coast. In addition, Coastal Act Section 30251 requires that visual qualities of the coastal areas shall be considered and protected.

City Beach has received many accolades, and has been described as the "World's Safest Beach" as well as the number one swimming beach in California. The City estimates that beach tourism annually brings in millions of dollars in revenue. While beach attendance is at its peak in the summer months, the City continues to receive a high number of visitors even in the off-season months. The SEIR's proposed trucking route goes through Carpinteria Avenue, Linden Avenue and Sandyland Road, the City's primary touristic and commercial streets leading to the beach from the U.S. 101 freeway. Furthermore, given the volume of the proposed trucking, City anticipates magnified associated ill

effects, such as increased mud and dust on the streets, noise, and recreation impacts such as street congestion and lack of parking at the beach that diminish the ambiance and access that visitors seek and expect when visiting the City.

Neither the SEIR's impacts analysis (e.g., Noise and Vibration, Recreation) nor the alternatives analysis accurately or adequately characterize these impacts to the City. For example, the analysis of recreation impacts brushes aside disruption of City Beach users associated with surf zone disposal, finding that it would not occur. (SEIR 2-12.) Similarly, the Noise analysis is based on a thirteen-year old document (2007 traffic study prepared by Fehr & Peers Transportation Consultants) that studied the effects of noise on receptors solely located on or about Carpinteria Avenue, far from the beach and its visitors. (SEIR 5.7-12 to 5.7-15.) Finally, the City considers the characterization of traffic impacts associated with debris disposal at City Beach as being "incremental" – where up to 200 truck trips per day is proposed – plainly inaccurate. (SEIR 5.10-5.)

The City, nonetheless, regards increased use of hydraulic dredging with disposal at the Marsh Mouth or terminus of Sandyland Cove Road, and/or rerouting some, if not all, of the necessary trucking to Sandyland Cove Road, may address these environmental and City concerns. With reduced trucking on the City's main roadways leading to the beach and queuing at the beach, coastal access opportunities will be better conserved.

E. Adequate Mitigation of Project Impacts Should Include a Public Information Program due to the Community's Law Tolerance for Trucking.

The SEIR provides that sediment disposal activity would occur for up to 10 hours per day ("typically 7 a.m. to 5 p.m."), five days a week. (SEIR at 2-4.) The noise and vibration impacts associated with trucking through the community extend beyond coastal access and recreation opportunities and have a real effect on people in their homes. Moreover, the community's tolerance for trucking is low, as City has discovered with the most recent County-driven projects noted above. During those operations, there was no public information program. As a result, the City had to embark on after-the-fact measures to allay the numerous concerns and complaints it received that included truck and tractor noise and exhaust/fumes, traffic congestion and pedestrian/bicycle safety, dirt and debris in residences and businesses, beach access and aesthetic impacts, ocean habitat impact concerns and water quality concerns. The City believes that had timely information been provided to the public before and during trucking operations, many of these issues could have been less severe.

Similarly, this SEIR fails to plan to communicate to those individuals who will be most affected by the project: City residents, businesses, and visitors. A public information program, which is customary if not mandatory for this type of undertaking, should be included, and the communication provided should be thorough and frequent. At a very minimum, before trucking through the community commences, the County should provide a two week and two working days advance written notice to the relevant community that explains the project and provides a timeline for completion, along with regular updates, including information at the close of the project. In addition, a County contact should be designated and publicized to handle public outreach, and the City supportive. Lastly, with any trucking operation, the start time should be 8 a.m. at the earliest in or adjacent to residential and visitor-serving neighborhoods.

III. CITY PERMITS WILL BE REQUIRED FOR PROJECT TRUCKING.

As the SEIR notes, prior sediment removal and deposit at City Beach have been accomplished without permits from the City, notably under exigent circumstances that required immediate action. (SEIR at 1-7.) These past experiences, however, have highlighted the need to control use of City property, especially where it will be subjected to a large number of trucks carrying heavy loads over a short period of time.

Attachment "C", which is incorporated herein, is an aerial photograph of trucked sediment deposit at Ash Avenue that occurred with the Santa Monica debris basin cleanup in early 2019 and illustrates the City's concerns. Such prior experience with the County for similar surf zone deposit at City Beach showed that either the number and/or type of personnel stationed at the beach was inadequate for purposes of ensuring compliance with operating standards. Hence, in addition to the permits City will require that are noted below, the City additionally recommends professional or experienced project management at the City receiver site that also monitors truck routes and manages traffic.

The City's Public Works Department will require the following permits for the activity described in the SEIR:

1. Transportation Permit for oversize loads; and
2. Engineering Permit for temporary traffic control devices in the City right-of-way.

The City's Community Development Department will also require a Coastal Development Permit for any work proposed at the receiving site (beach at terminus of Ash Avenue).

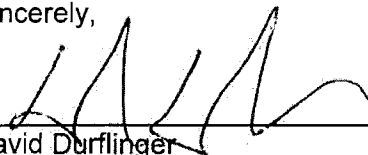
IV. CONCLUSION

The City recommends and submits for consideration hydraulic dredging as the preferred method of sediment removal in order to minimize impacts to its streets, residents and visitors. The advantages of hydraulic dredging in the Marsh, and in particular the upper areas, reduce or eliminate the need to truck sediment and may allow for a reduction of the existing Franklin Creek staging/ stockpile area. In addition, the City recommends that the trucking route be changed to exclusive or primary use of Sandyland Cove Road, which is a significantly shorter, direct route to the surf zone.

The City recognizes that sediment must be deposited in the shared watershed and is protective against flood hazards, consistent with the Coastal Regional Sediment Management Plan. These comments are offered with a desire to foster further public participation and accomplish a high quality project.

We appreciate the opportunity to comment on the project to assist the County in adequately analyzing and mitigating impacts. Questions regarding this letter and further coordination on these issues should be directed to me at (805) 755-4400, or daved@ci.carpinteria.ca.us.

Sincerely,



David Durflinger
City Manager



Attachment "B"
Alternative Sediment Disposal

LEGEND

- Truck Head Route Alternative 1,500 ft
- Hydraulic Dredge discharge alternative 1,500 ft max.

Santa Monica Flood Control Basin

Attachment "C"
Placement of Santa Monica Debris Basin
Sediment at Ash Avenue, Carpinteria, CA
Early 2019

