

CALIFORNIA COASTAL COMMISSION

SOUTH CENTRAL COAST AREA
89 SOUTH CALIFORNIA ST., SUITE 200
VENTURA, CA 93001
(805) 585-1800



February 15, 2018

Santa Barbara County Planning & Development
Attn: Nicole Lieu, Senior Planner
123 East Anapamu Street
Santa Barbara, CA 93101

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PLANNING & DEVELOPMENT

**RE: Second Draft Mitigated Negative Declaration (Draft MND) 15NGD-00000-00006
Feldman Residence at 755 Sand Point Road, Santa Barbara County**

Dear Ms. Lieu:

We have reviewed the second Draft MND, dated January 16, 2018, associated with the proposed project at 755 Sand Point Road in Santa Barbara County, and we would like to offer the following comments to be considered in addition to the comments contained in our July 7, 2017 letter (attached) on the subject project. As provided in the second Draft MND, the revised proposed project includes the demolition of an existing 1,774 sq. ft. single family dwelling and construction of a new 5,995 sq. ft. single family dwelling with a 5,800 sq. ft. lower level storage area, 1,335 sq. ft. attached garage, pool/hot tub, driveway modifications, and 350 cu. yds. of grading (cut). The project is located on a 1.15 acre beachfront property at 755 Sand Point Road, which is bordered by the Carpinteria Marsh to the north, the Pacific Ocean to the south, and residentially developed properties to the east and west.

As detailed in our previous letter concerning the subject proposed development, an existing rock revetment is situated on the property, which is part of a larger rock revetment extending from 539 to 845 Sand Point Road that was initially constructed in 1964 to protect the existing residences. Over time, this revetment has been fortified, enlarged, and repaired without the necessary coastal development permits, and Commission Enforcement staff continues to work with the County and affected property owners to address these revetment violations. Although the project does not include any new development associated with the subject rock revetment on the property, the proposed pool and decking associated with the development would be sited further seaward of the existing residence and existing deck, and immediately adjacent to the rock revetment, such that future permitting actions taken to address the rock revetment would be unable to relocate the revetment further landward should that be determined to be necessary to avoid adverse impacts to coastal resources. Also, given the history of shoreline protective devices being constructed in order to protect existing residences, the proposed project to demolish and redevelop one of these residences raises significant issues regarding the reliance on shoreline protective devices and known adverse impacts caused by such devices upon shoreline processes, sand supply, and public access.

In addition, the proposed residence is significantly larger than the existing residence and occupies a greater lineal extent of the property that would be vulnerable to coastal hazards. The second draft MND indicates that a Sea Level Rise and Wave Run-up Analysis was prepared for

the proposed project which analyzed the development in relation to coastal hazards under the worst case sea level rise projections, combined with a 100 year storm and wave run-up events, over the 75 year design life and without reliance on existing or new shoreline protective devices. Although the second draft MND states that the Wave Study concluded that "[u]pon evaluation of the improvements...the proposed residence can be constructed at the current site in a manner that can withstand the site's extreme conditions", the draft MND goes on to state that a confluence of the worst case sea level rise projections with a 100 year storm and a 100 year wave run-up event would result in wave run-up extending above the second story of the residence to the first habitable floor of the proposed residence (after having entirely flooded the first uninhabitable story of the residence) by 3.7 inches. Further, the first uninhabitable story of the proposed residence has been designed to include break-away walls which have the potential to become marine debris should the residence be subjected to wave run-up. This design raises significant concerns regarding adverse impacts to coastal waters, including the Pacific Ocean and the Carpinteria marsh, from such debris.

Therefore, this project raises significant issues concerning coastal hazards given that, based on the information contained in the County's second Draft MND, the proposed project is expected to be subject to wave action and shoreline erosion over the structures expected life. The second draft MND does not adequately address siting and design alternatives that would be most appropriate given the degree of risk posed by possible sea level rise scenarios and how long the development might be free from risk without relying on existing or new shoreline protective structures. A range of siting and design alternatives need to be analyzed in this case in order to determine which project design would minimize hazards from the identified sea level rise scenarios for as long as possible without relying on existing or new protective structures and while avoiding or minimizing impacts to coastal resources. These alternatives should include locating the residence further landward, reducing its size and footprint, and other options that would minimize shoreline hazard risk for as long as possible without additional shoreline armoring and would not preclude removal or landward relocations of the existing rock revetment. Once the appropriate siting and design alternative is selected, adaptation measures need to be identified and conditions of development need to be imposed on the permit to address issues regarding triggers for relocation or removal of the development as site conditions change, provision for lateral public access, and other strategies to reduce risk and/or impacts to coastal resources and public access over time.

The proposed project also raises significant concerns regarding temporary and permanent impacts to on-site wetlands. The second draft MND states that "[a] 100 foot buffer from wetland vegetation is generally recommended in order to separate sensitive areas from human activity, pollutant runoff, invasive plants, etc.", however, the project proposes to include 3,522 square feet of development (1,704 sq. ft. of driveway, 1,409 sq. ft. of the new residence, 90 sq. ft. of new hardscape area, 219 sq. ft. of new stairways, and 100 sq. ft. for a new fire hydrant) or 0.08 acres of development within the 100 foot buffer area between the new development and the on-site wetlands. In addition, the residence is proposed to be sited 78.5 feet from the on-site wetlands and a new fire hydrant is proposed for installation 8.7 feet from the on-site wetlands edge. The project also proposes construction to occur within 50 feet of the on-site wetlands. Although a Native Plant Restoration and Habitat Enhancement Plan is proposed for the project, the second

draft MND should first analyze avoidance of impacts to wetland environmentally sensitive habitat areas by providing a minimum buffer of 100 feet before mitigation is considered, consistent with the requirements of Policies 2-11, 3-19, and 9-9 of the County's certified Land Use Plan and Sections 30230, 30231, and 30240 of the Coastal Act. Accordingly, the second draft MND does not adequately address siting and design alternatives that would be most appropriate given the substantial amount of proposed development within 100-feet of the on-site wetlands. A range of siting and design alternatives need to be analyzed in order to determine which project design would avoid adverse impacts to on-site wetlands to the greatest extent feasible. These alternatives should include modifying and/or reducing the size and footprint of proposed development to avoid on-site wetlands and wetlands buffer areas and thus avoid both temporary and permanent adverse impacts to environmentally sensitive habitat.

Thank you for your continued consideration of our comments. We would also like to note that these comments are preliminary based upon the limited information available in the Draft MND and we will provide more specific comments when the County's CDP staff report is available for the proposed project. Please feel free to contact me if you have questions.

Sincerely,



Megan Sinkula

Coastal Program Analyst

CALIFORNIA COASTAL COMMISSION

SOUTH CENTRAL COAST AREA
SOUTH CALIFORNIA ST., SUITE 200
VENTURA, CA 93001
(805) 585-1800



July 7, 2017

Santa Barbara County Planning & Development
Attn: Nicole Lieu, Senior Planner
123 E. Anapamu Street
Santa Barbara, CA 93101

**RE: Draft Mitigated Negative Declaration (Draft MND) 15NGD-00000-00006
Feldman Residence at 755 Sand Point Road, Santa Barbara County**

Dear Ms. Lieu:

We have reviewed the subject Draft MND associated with the proposed project at 755 Sand Point Road in Santa Barbara County and would like to offer the following comments. The proposed project includes the demolition of an existing 1,774 sq. ft. single family dwelling and construction of a new 5,995 sq. ft. single family dwelling with a 5,800 sq. ft. lower level storage area, 1,335 sq. ft. attached garage, pool/hot tub, driveway modifications, and 477 cu. yds. of grading (cut). The project is located on a 1.15 acre beachfront property at 755 Sand Point Road, which is bordered by the Carpinteria Marsh to the north, the Pacific Ocean to the south, and residentially developed properties to the east and west. An existing rock revetment is situated on the property, which is part of a larger rock revetment extending from 539 to 845 Sand Point Road that was initially constructed in 1964 to protect the existing residences. This revetment was then fortified and enlarged further seaward in 1983 without the benefit of a coastal development permit. Repair work to replace areas of the 1983 revetment was performed in 1994 and 1998, also without the necessary coastal development permits. As the County is aware, Commission Enforcement staff is working with the County and affected property owners in order to address these revetment violations.

The proposed project does not include any new development associated with the existing and unpermitted rock revetment(s) on the property. However, given the unique site constraints along this stretch of coast and the history of shoreline protective devices being constructed in order to protect existing residences, the proposed project to demolish and redevelop one of these residences raises issues regarding shoreline hazards, shoreline processes and sand supply, as well as public access. Even though the proposed residence does not extend further seaward than the existing residence, the proposed new residence is significantly larger than the existing residence and would occupy a greater lineal extent of the property that would be vulnerable to coastal hazards. In addition, the proposed deck appears to be extending further seaward than the existing residence and deck.

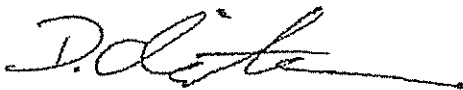
The draft MND states that a Sea Level Rise and Wave Run-up Analysis was prepared for the proposed project which looked at the proposed development in relation to coastal hazards under a range of sea level rise projections, combined with 100 year storm and wave runup events, over the 75 year design life of the development and without relying on existing or new shoreline protective devices. The MND states that the analysis concluded that: "Upon evaluation of the improvements...even at the end of the project life and considering the most conservative SLR [sea level rise] interpretations and removal of the seawall, the proposed residence can be constructed at the current site in a manner that can withstand these extreme conditions." It also states that for the most extreme sea level rise projection during a 100-year storm event (9.7 feet or 15.5 elevation NGVD29 at year 2090), wave run-up would

extend above the first habitable floor of the proposed residence by about six inches assuming that the existing revetment is removed. In addition, the lower storage area level of the proposed residence that would be about ten feet below the projected extreme scenario run-up elevation has been designed as uninhabited space with break-away walls.

As such, the primary issue raised by this project is that, based on the information contained in the County's Draft MND, although the analysis indicates that the structure would likely be safe from wave action in the immediate future, given sea level rise, the proposed project is expected to be subject to wave action and shoreline erosion over the structure's expected life. The draft MND does not adequately address siting and design alternatives that would be most appropriate given the degree of risk posed by possible sea level rise scenarios and how long the development might be free from risk without relying on existing or new protective structures. Hazard minimization may be the only feasible option for development on such a hazard constrained-site between a slough and the ocean. As such, a range of siting and design alternatives need to be analyzed in this case in order to determine which project design would minimize hazards from the identified sea level rise scenarios for as long as possible without relying on existing or new protective structures and while avoiding or minimizing impacts to coastal resources. These alternatives should include locating the residence further landward, reducing its size and footprint, and other options that would minimize shoreline hazard risk for as long as possible and would not preclude removal or landward relocations of the existing rock revetment, while not conflicting with other resource protection policies of the LCP. Once the appropriate siting and design alternative is selected, adaptation measures need to be identified and conditions need to be imposed on the permit to address issues regarding triggers for relocation or removal of the development as site conditions change, provision for lateral public access, and other strategies to reduce risk and/or impacts to coastal resources and public access over time.

Thank you for your consideration of our comments. Please feel free to contact me if you have questions.

Sincerely,



Deanna Christensen
Supervising Coastal Program Analyst