

# Santa Barbara Audubon Society, Inc.

A Chapter of the National Audubon Society



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Santa Barbara County  
Board of Supervisors  
105 E. Anapamu Street, Rm 407  
Santa Barbara, CA 93101

**RE: Goleta Beach CARE Project**

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Dear Supervisors:

Santa Barbara Audubon (Audubon) would like to support the Permeable Groin project proposed to achieve beach stabilization at Goleta Beach, but with several cautions and suggestions. We are saddened that the process is "backwards" in that the EIR has not yet been certified, and the public has had limited input on the proposed project--just this morning at the Parks Commission and Parks Department Special Meeting. We recognize the bind the county is in with the permit requirement to submit a project application to the Coastal Commission this month.

This writer is the President of Santa Barbara Audubon, and these comments reflect the position of that organization. Please note, however, that I also serve on the County Parks Commission, and was a member of the Goleta Beach Working Group.

**Public Process.**

We urge the Board of Supervisors to instruct the Park Department of CEO's Office to prepare a plan for the Board's approval for certification of the EIR and presentation of the project approved by the board to the public. Should the Board direct staff to submit the project application to the Coastal Commission by the end of January, this public process may result in changes to the project, necessitating a revised project description. Evaluation of the Final EIR may provide recommendations for changes from the public or experts not privy to the Administrative draft of the EIR.

**Permeable Pier--emergency revetments.**

Audubon disagrees with the timing of removal of the emergency revetments, which under the current proposal could be years away, after the sand accumulation stabilizes in a seasonal pattern (Table 1: "at least ten years following the initial groin construction"). Audubon asserts that the appropriate time for removal of the revetments is during the initial beach nourishment. This will be less costly, reduce the disturbance of later removal when extensive excavation would be required, thus causing additional environmental impact. It would also comply with Coastal Commission requirements for removal of the *emergency* revetment. A possible exception would be the west-end unpermitted revetment. The Parks proposal includes re-engineering this revetment, with possible removal in future years if "sufficient" sand is retained seaward of the revetment. This is the most vulnerable area, with vital utilities close to the eroded edge of the parking lot. However, given the plan to pre-fill the beach with 500,000 cubic yards of sand, with the expectation of sand retention, an

engineered revetment seems unnecessary at the start of the project. The goal should be ultimate removal, if the beach stabilization is successful. The current revetment could be retained, if permitted. If sand retention is only partially successful, an engineered revetment in the west end of the park can be installed at a later date.

#### **Closure of Goleta Slough.**

The Coastal Commission staff expressed concern that the mouth of Goleta Slough could close more frequently with the salient from the permeable pier, in the letter of May 25, 2007. The CCC staff recommended further study of the project's potential impacts to avoid impacts to the slough mouth. Has additional study been undertaken by County consultants? If not, this needs to be done. If a project application is submitted to the CCC without this requested analysis, the project will likely be deemed incomplete until this study has been accomplished.

#### **Borrow Site.**

The off-shore borrow site proposed for pre-filling the beach stabilization project of 500,000 cubic yards is several acres in size. Audubon has heard that there are ecological problems with the use of this site, and a comment letter was submitted regarding this issue. The public has yet to see these comments or any changes in the EIR in response, so the questions remain as a major concern.

#### **UCSB East Bluffs Beach.**

The modeling presented in the DEIR shows that the University beach below East Bluffs will fill with sand after construction of the permeable pier. However, the beach nourishment appears to be within the boundaries of Goleta Beach only. What impact would this have on down-coast beaches and bluffs?

#### **Funding.**

County Parks has identified secured funding and potential funding for the CARE project. An additional estimated \$3.7 million is needed. Park staff states that additional funding would be sought after project approval at the Coastal Commission. That seems to delay the construction phase unnecessarily. Perhaps a reasonable time to seek additional grant funding would be after determination of a completed application by the Coastal Commission staff.

#### **Summary.**

Santa Barbara Audubon finds the Permeable Pier option very intriguing. There are many questions left to be answered regarding the final design and mitigation to reduce biological and other impacts. However, we can support an application to the Coastal Commission for a Permeable Pier project, with some assurance by the Board that these problems will be addressed, and a public process devised to allow for input and changes to the final design as needed.

Sincerely,



Darlene Chirman  
President