



155

March 17, 2014

Alex Tuttle, Project Planner  
**County of Santa Barbara**  
123 E. Anapamu Street  
Santa Barbara, California

c/o Brian Trautwein  
Environmental Analyst / Watershed Program Coordinator  
**Environmental Defense Center**  
906 Garden Street, Santa Barbara, CA 93101

**Re: Goleta Beach County Park Managed Retreat Project 2.0  
Environmental Impact (EIR) Review**

This letter is to supplement my letter dated July 24, 2013 - based upon the "Responses to Comments" (RTC) to the Draft EIR. I offer the following:

From the overall perspective of my qualifications, please note that I am qualified to assess alternatives for such projects and make conclusions as to their impacts and expected performance. This has been a key element of my professional practice for over 36 years. My opinions are based on analysis of the facts of the case at hand as presented in County documents, as well as my education and experience. I have reviewed the modeling done for Goleta Beach and the prior DEIR. I am very familiar with the models and the associated coastal processes science as applied to Goleta Beach, for which I have analyzed the effects of alternatives and reviewed in detail the County's environmental assessments since 2003.

In addition, please note that:

- (1) My opinions are very much based upon the "site-specific", "scientific and factual data", which is based in part upon the results of "modeling or calculations" - as cited in the draft EIR. For example, see RTC 14-33, which indicates the park "lawn" is at a very low risk of damage by erosion.
- (2) As noted in your email, the rocks on the western end are now exposed. The RTC (last full paragraph on A-201) erroneously contends: "Passive or active erosion would only occur if prolonged exposure of the revetments were to occur." This contention fails to recognize the dynamics of the revetment-beach interaction, whereas erosion attributable to the revetment occurs as soon as the revetment becomes exposed - as now exists for the rocks on the western end.
- (3) The RTC 14-6 appears to recognize the potential for sea level rise to increase exposure of the revetment at which point, "the County could change course..." If the proposed project is to be approved, I suggest you identify appropriate monitoring and thresholds (like period of time with revetment exposure) that would prompt the County to "change course".

If you have any questions, or if I can assist you further, please contact me or Julia of my office.

Sincerely,  
**COASTAL TECH**



Michael Walther, P.E., D.CE  
President

