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August 30, 2013

Alex Tuttle
County of Santa Barbara
123 E. Anapamu Street
Santa Barbara, CA 93101

RE: Draft Environmental Impact Report, Goleta Beach County Park Long-Term Protection Plan

Dear Mr. Tuttle:

Commission staff has reviewed the Draft Environmental Impact Report for the Goleta Beach County Park Managed Retreat Project 2.0 ("DEIR"), dated June 2013, and are providing the following comments for your consideration. The proposed Goleta Beach County Park Managed Retreat Project 2.0 ("proposed project") includes the following project components, as described in the DEIR: removal of parking lots 6 and 7 (107 spaces) and restoration of the area to sandy beach, construction of a 40 ft. wide transportation and utility corridor with 500 ft. long earthen berm and relocated at-risk utilities (sewer line, water line, telephone conduit, reclaimed water line, and gas line) to the new utility corridor, relocation of an approximately 1,800 ft. long section of bike path to the utility corridor, construction of a geotextile dune (9 ft. high x 13 ft. wide) and buried cobble revetment (250 ft. long x 5. ft. high x 40 ft. wide) to protect the Goleta Sanitary District sewer outfall pipe and vault, removal of the approximately 1,200 ft. long unauthorized rock revetment, addition of bike parking, and potentially the relocation of the western restroom building outside of the coastal process zone. The DEIR also included three project alternatives: *Natural Shoreline Management* (Alt. 1), *Temporary Revetment Retention and Pilot Coastal Protection Projects with Beach Nourishment* (Alt. 2), and *Westward Managed Retreat Program Alternative (2015-2050)* (Alt. 3). Please consider our comments, below.

Overarching Comments:

1. Baseline for Analyzing Impacts. Any analysis submitted to the Coastal Commission in the future for permitting purposes must evaluate the impacts of the project and each alternative relative to the shoreline that would exist if the existing unauthorized rock revetment was not present. The baseline conditions cannot be the existing as-built condition since it would not provide useful information regarding potential impacts. Given that the as-built approximately 1,200 ft. long revetment has not yet been authorized, the proposed project and all alternatives for management of erosion at Goleta Beach must be considered relative to the shoreline that would exist without this shoreline protection.

2. Managed Retreat Implementation Plan. The DEIR discusses future development of a Managed Retreat Implementation Plan ("MRIP") as part of proposed mitigation measures to address the potential damage to the Park that could occur following retreat (as described in mitigation measures on pgs. 4.1-19, 4.1-27, 4.4-56, 4.6-10,

4.7-12, 4.10-31, 4.12-11, 4.12-14) The DEIR states that the MRIP "shall be divided into two broad sets of actions: the first to address shoreline management at or near the Mean High Tide Line and emergency measures (e.g., debris cleanup, construction of a winter beach berm, sand bags, etc.)" and "the second shall address longer-term Park reconfiguration projects (e.g., restroom relocations, removal of Rangers' residences)." The DEIR states that the draft MRIP shall be completed within 18 months of the land use clearance for the project and indicates that the draft MRIP shall be provided to the California Coastal Commission for review and comment (p.4.1-19). Instead of developing a MRIP as part of a future process, we strongly recommend that such a plan be prepared and analyzed in relation to the proposed project and project alternatives. Please note that the actions anticipated to be included the MRIP within the Commission's retained jurisdiction constitute "development" as defined in the Coastal Act and will need to be included in the project as part of any CDP application submitted to the Coastal Commission.

3. Description of on-going beach nourishment. The DEIR contains various discussions of a "Goleta Slough Maintenance and Beach Nourishment Program" and the activities of the Santa Barbara County Flood Control District's "ongoing beach nourishment" at Goleta Beach. (p.4.4-28) Currently, there is no active Coastal Development Permit "CDP" from the Coastal Commission for deposition of material directly onto Goleta Beach to serve as beach nourishment. The Coastal Development Permit for the opportunistic beach replenishment program under BEACON project (CDP No. 4-02-074) expired in 2010, after a term of 5 years. Additionally, the most current Santa Barbara County Flood Control District CDP allows deposition of tested desilted material within the active surfzone and not directly onto the beach. Therefore, the baseline for discussions and analysis regarding on-going beach nourishment at Goleta Beach should be adjusted accordingly and any new proposed beach nourishment (as proposed in project alternatives) must be described in detail and analyzed independently for impacts.

Proposed Project

1. Buried Geotextile Dune and Cobble Berm: The DEIR describes the proposed geotextile dune structure as consisting of two layers of sand-filled geotextile bags approximately 9 f. high and 13 ft. wide at its base, with the first layer installed approximately 5 ft. below existing grade. The geotextile revetment would be fronted on the seaward side by a buried 250 ft. long cobble berm, up to 5 ft. high and 40 ft. in width at its toe. The entire structure would be buried with a newly constructed sand dune approximately 4.5 ft. above existing grade. (p. 2-14 and p.2-15) The purpose of this structure is to protect the Goleta Sanitary District sewer outfall pipeline and vault buried below the Park. The sewer outfall pipeline connects to the vault at a depth of 10 ft. below MLLW. (p.4.12-13) Please provide a rationale of why such a large protective device occupying a substantial area of sandy beach is necessary and provide an analysis of whether a smaller protective device for the sewer outfall and pipe is feasible. Has a geotextile core dune with a cobble berm been used in any other projects or is this technique wholly experimental? What options, besides cobble, are feasible to protect the geotextile revetment? Can the geotextile revetment be designed to function without added scour protection?

2. The geotextile revetment is only expected to be effective for about the next 15 years (until 2030). Are there other 10 to 20 year options that could replace the geotextile revetment and cobble berm? What alternative "soft" solutions are feasible?

3. Various descriptions in the DEIR state that the cobble berm could be exposed and begin to erode within only a few successive storm seasons. (p.4.4-53) Further, the DEIR states that "modification or complete relocation would be necessary to preserve the functionality of the vault as a sewer maintenance point over the long-term." Thus, given the potentially short lifespan of such a device, please provide an analysis of the feasibility of relocating the sewer pipeline and maintenance vault to a landward location, either outside of the coastal process zone or to a location where it would be protected by the existing permitted seawall.

4. Transportation and Utility Corridor. The utility corridor is proposed to be located partially within the Caltrans right-of-way. Is it feasible to locate the utilities either within the shoulder or under Highway 217 (entirely outside of the coastal process zone)? For the proposed utility corridor/bike path location, is any native vegetation proposed to be removed besides coyote brush scrub? Is any wetland or ESHA proposed to be impacted? Figure 2-2 seems to depict the area as "marshland." Please describe the steps and project timing for obtaining approval from Caltrans to locate the utility corridor within the Caltrans easement.

5. Restroom Relocation: Figure 2-2 of the DEIR depicts the potential restroom relocation site in "marshland." Please evaluate relocating the restroom building to an already developed area and outside of all wetland areas.

6. Cumulative Projects Scenario. Table 3-1 *Pending and Approved Projects in the Project Vicinity* notes that a "Goleta Slough Ecosystem Management Plan (GSEMP") is in development. Please provide more information about the GSEMP and how such a plan may relate to any future shoreline management projects at Goleta Beach.

7. The analysis for the proposed project notes that once the revetment is removed, there will be inland materials such as concrete and asphalt that will erode into the nearshore area. These materials may be harmful to the marine environment, and as noted in the DEIR, they can also be safety hazards. To the extent possible, these materials should be replaced with non-hazardous materials prior to the removal of the revetment. If not all harmful materials can be removed and replaced with more benign materials, there should also be a safety and cleanup plan developed to clear the beach and nearshore of all safety hazards following any erosive storm.

8. Biological Resources

    a) The DEIR mentions that Goleta Beach is groomed to remove debris especially during the summer months (p.4.3-3). The DEIR also states that the beach is cleaned of trash and seaweed three times annually, after major winter storms, and if public complaints are received. (p.4.10-14). Please provide a more detailed description of any past and on-going beach grooming operations, including the removal of beach wrack (how is it removed, how much is removed, where is it removed from), or any other maintenance that

occurs on the sandy beach at Goleta Beach. Please provide an analysis of how these activities may impact or have impacted beach ecology.

b) The analysis of biological impacts in the DEIR should be based upon up-to-date *comprehensive* biological surveys. For the purposes of reviewing CDP applications, we will require recent (completed within 1-2 years of application submittal) biological information.

c) The DEIR does not provide an adequate analysis of the biological impacts of a cobble berm on to the existing beach ecology. Cobble is not part of the Goleta Beach environment at present, as noted in the Coastal Processes discussion. Once introduced into the system, cobble can be quite mobile (e.g., as experienced at the Ventura River mouth). We are concerned with the introduction of cobble to this area relative to its effects to the beach environment and the slough. Please provide an analysis of the impacts to cobble on the swash zone, upper beach, and coastal strand habitat. Additionally, what impacts would cobble have on the mouth of Goleta Slough? The inlet conditions at Goleta slough represent a dynamic balance between longshore sediment transport across the slough mouth and through the ebb tidal delta, flood and ebb tidal delta balance, tidal flow in and out of the slough, freshwater flows through the Slough and sediment carried into the slough from inland sources. The DEIR states that dispersal and loss of cobbles from the proposed cobble berm would occur from large storm waves and longshore currents would transport cobble downcoast (p.4.4-54) It is particularly important to for the DEIR to provide an analysis of the impacts from cobble to the mouth of the Goleta Slough for the proposed Project and alternatives relative to potential changes in the frequency that the slough mouth is in an open and/or closed condition. In addition, please address any potential impacts to slough closure and impacts on fish passage into the slough.

d) The information presented on raptor and shorebird use of Goleta Beach Park in the DEIR does not appear to be based on recent surveys conducted at the site. Have surveys been conducted of the site in the past and/or in recent years? If so, what are the results of these surveys? If not, up-to-date field surveys should be conducted to determine the use of the park by raptors and shorebirds for nesting and foraging. Normally we would require a minimum of one year of surveys for shorebirds. We would, therefore, recommend that the County start surveys from Campus Point to well east of the Goleta slough inlet as soon as possible and supplement any missing time periods with historical data and information as needed.

e) Golbose dune beetles are listed as occurring within the coastal strand habitat found at Goleta Beach. However, the DEIR does not present any sampling data from this coastal strand community.Surveys for this and other invertebrates should be conducted in the coastal strand community at Goleta beach.

f) A figure and table should be presented to show exactly what type, location, and acreage of habitats will be filled in with geotextile core dune/cobble berm

structures or other structures as a result of the proposed Project and project alternatives. Similarly, a figure and table should also be presented to show exactly what type, location, and acreage of habitats will be permanently changed as a result of future relocation of park facilities (parking, utilities, restrooms, etc.).

g) Any project at Goleta Beach must take into consideration and ensure the continued use of the area by the following sensitive species: globose dune beetles that occupy coastal strand habitat and have been identified in this habitat at Goleta Beach; Belding's Savannah Sparrows that live and nest in Goleta Slough and forage in the wrack at Goleta Beach (especially at the western portion of Goleta Beach); Western Snowy Plovers which have been identified near the slough mouth at the eastern end of Goleta Beach; red sand verbena, a coastal strand/southern foredune species that has been found at Goleta Beach; and southern tarplant, which tends to do well in disturbed coastal habitats, has also been identified at Goleta Beach.

h) The DEIR identifies coastal strand and salt marsh habitat as communities of special concern however the Coastal Commission considers coastal strand habitat, which is incipient dune habitat, and salt marsh habit, environmentally sensitive habitat or ESHA.

9. Coastal Processes

a) Baseline for Coastal Processes analysis. Impact CP-1 states that "Removal of existing rock revetment in the Park west of the Beachside Bar-Café would expose much of the Park to coastal processes, potentially resulting in shoreline retreat and damage to shoreline lawn, structures, and Park facilities from both wave run-up and coastal erosion. Impacts to Goleta Beach County Park from coastal processes would be significant (Class I)." The DEIR states that "the proposed Project would move away from the County's historic approach of using coastal protection structures to protect the west end of the Park toward a managed retreat approach to allow shoreline fluctuation in response to natural processes." The determination that a significant impact will occur due to the proposed Project is a result of using the incorrect baseline for analysis. While the management technique has been coastal armoring on an emergency/temporary basis, the baseline for analysis should be the site conditions that would exist but-for the unauthorized revetment. Please provide an analysis of impacts to coastal processes from the proposed Project and alternatives assuming the unpermitted revetment does not exist. This analysis is essential for future processing of a CDP application submitted to the Coastal Commission.

b) Please explain what is meant by the limit of coastal process zone (100 year Storm Event Erosion Hazard Zones) on Figure 4.4.13. Also explain how this relates to the Potential Wave Run-up under 100-year Storm Conditions (Figure 4.4.12) and why these are seeming discrepancies between the two.

c) Goleta Beach has been identified as having significant seasonal oscillation. Following a 100-year storm event, there could be up to 100 feet of inland

erosion; however, much of this could recover due to beach oscillation. Please provide more quantitative information on the beach recovery timeline and likely long-term consequences to the beach and shoreline from a significant storm event.

10. Public Access and Recreation

a) Baseline for public recreation and access analysis. Impact REC-2 states that "Implementation of the Project would potentially result in significant and unavoidable impacts to recreation and coastal access due to a loss of developed shoreline park and coastal access facilities (Class I)." The DEIR states that "the proposed Project would include a shift from a coastal protection management approach at Goleta Beach Park to one that emphasizes managed retreat." (p.4.10-27) The determination that a significant impact to recreation will occur due to the proposed project is a result of using the incorrect baseline for analysis, the "shift from coastal protection to managed retreat." While the management technique has been coastal armoring on an emergency/temporary basis, the baseline for analysis should be the site conditions that would exist but-for the unauthorized revetment. Please provide an analysis of impacts to public access from the proposed project and alternatives assuming the unpermitted revetment does not exist. This analysis is essential for future processing of a CDP application for any future project submitted to the Coastal Commission.

b) Removal of Parking Spaces. The project proposes to remove 107 parking spaces but does not identify alternative areas to relocate any of the lost parking spaces. The proposed Project and project alternatives should incorporate locations where these lost and/or additional spaces may be provided for elsewhere in the park. Additionally, the DEIR should include an analysis of reconfiguring existing parking spaces in the other lots to increase parking spaces. Some of the sites that can be incorporated in the project description are identified in the MM REC-5b, *Parking Replacement Plan* (pgs. 4.10-40 through 4.10-41). Please provide a figure depicting these future potential alternative parking locations. Further, how could parking for those people going to UCSB and not using Goleta Beach Park be restricted or enforced? Consider the options to convert the residential ranger area for use as parking.

c) Please include up-to-date survey data of usage of the parking lots (number and percentage of parking spaces used at any given time) and the park (number of visitors per day) during *peak* and *non-peak* times.

d) Section 30221 of the Coastal Act protects recreational uses of oceanfront land unless present and foreseeable future demand for public or commercial recreational activities that could be accommodated on the property are already adequately provided for in the area. How would relocation of restrooms and other facilities threatened by erosion landward (without shoreline protection) and some reduction in lawn area affect beach access and usage of the park? Additionally, please provide an analysis of the future projected need for parking and recreational use. Do any nearby facilities have

the capacity to mitigate any loss in parking or recreation facilities at Goleta Beach without the threat of overcrowding? The EIR should also provide an analysis for implementation of an offsite parking and shuttle system and/or alternative transportation options (bus, etc.) to mitigate the identified potential long term impacts to parking at Goleta Beach. This analysis should not be put off for the future as part of a MRIP.

e) Policy 7-12 of the County's LUP states, in part, that "[t]he County should [also] pursue an agreement with UCSB to use campus parking lots to accommodate the overflow from Goleta Beach Park during peak-use periods." (p.4.10-20). Please explain what steps have been taken to date or what steps the County plans to take to work with UCSB to accommodate public parking as mitigation for any future lost parking spaces at Goleta Beach.

f) The DEIR states that, while replacement of developed shoreline park facilities with expanded beach, intertidal, or open water areas would support different recreational values such as swimming, fishing, kayaking etc., such offshore recreation already occurs at Goleta Beach and is not in limited supply in the Project vicinity. Further, the DEIR emphasizes that "developed coastal park facilities in the Goleta Valley are in limited supply." (p.4.10-31) Therefore, the DEIR concludes that that loss of developed park facilities would substantially reduce the recreational value of Goleta Beach Park. Commission staff emphasize that the recreational value of sandy beach is also extremely important at Goleta Beach. The DEIR should give equal weight to use of the sandy beach itself, including vertical access to and lateral access along the beach. Sections 30210-30214 of the Coastal Act protect public access to the sea, including, but not limited to, the "use of dry sand and rocky coastal beaches," while still protecting natural resources in the area and preventing overcrowding. Additionally, Sections 30220-30224 and 30255 protect recreational and commercial uses of the coast when these uses cannot readily be provided at inland areas. Grass parks are an amenity that can readily be provided for at any number of inland locations in the vicinity of Goleta Beach. Sandy beaches, however, provide important recreational opportunities that, while different than those provided by a grass park, are important coastal resources and cannot be provided for at inland locations. Grass parks, while valued, are also not essential for the public to recreate on and access Goleta Beach.

g) For the proposed project, the DEIR does not include an analysis of the impacts of the proposed geotextile dune and cobble berm on public access to and along the beach. What are the potential impacts to public access and recreation on the sandy beach if the cobble berm and/or geotextile dune becomes exposed and begins to erode away? How would routine maintenance of a cobble berm impact public access?

Alternative 1 – Natural Shoreline Management

1. Alternative 1 proposes to install a cobble berm and geotextile core dune system along 2,050 ft. west of the restaurant to the headland at the west end of Goleta

Beach. Please see our comments, above, requesting additional information and analysis regarding the geotextile core dune and cobble berm and potential impacts related to biological resources, coastal processes, and recreation and public access.

2. This alternative proposes to initially install 12,000 cubic yards of cobble and anticipates the need to maintain this amount of cobble over time. The DEIR for this alternative only provides a conclusory statement that changes resulting from cobble "would not be anticipated to result in adverse effects to biological resource as such cobbles are already present in the overall system." (p.7-27) What are the potential impacts of a change from a sandy beach to a cobble beach as the cobble erodes? Cobble is not part of the Goleta Beach environment at present, as noted in the Coastal Processes discussion in this DEIR. But, once introduced into the system, cobble can be quite mobile (e.g., as experienced at the Ventura River mouth). We are concerned with the introduction of cobbles to this beach ecosystem. If a cobble berm remains part of the proposed project or any of the alternatives, please analyze mobility, impacts to Goleta Slough, its ecology, impacts to slough closure and impacts on fish passage into the slough.

3. The DEIR does not describe what routine maintenance actions would need to occur to keep the geotextile core dune and cobble berm in place after erosional events. The DEIR states that if the dune and berm is subject to wave attack and damage over two successive seasons, the County would cease maintenance of the structure and seek alternative methods for protection of the Park. (p.7-24) Please describe what actions the County would need to take for maintenance of the berm and dune over time. How and at what point would the County determine whether the dune and cobble berm becomes damaged beyond repair? What would removal of the dune and berm entail?

4. This alternative proposes to install a 20 ft. long Reflected Wave Energy Dissipator (RWED) inside the eastern cove of the headland at the west end of Goleta Beach. This structure would be constructed from boulders from the unauthorized revetment and stacked against the bluff. How is RWED any different than a rock revetment? What biological impacts would these rocks have on the sensitive species in this area of Goleta Beach?

5. For the proposed beach nourishment, please provide a detailed strategy for minimizing, to the greatest extent possible, all adverse impacts to the kelp/eelgrass/surfgrass, rocky reef, shallow soft bottom subtidal, sandy beach (upper, mid, lower zones – epifauna and infauna for each zone including shorebirds), wrack, rocky intertidal, coastal strand habitats in the Goleta Beach area from all activities associated with sand replenishment. The strategy should include ecological considerations of timing, sensitive resource avoidance, sand deposition location, and enhanced habitat recovery, at a minimum. In addition, any plans for sand replenishment must identify the sand source location, provide evidence of the suitability of the sand for placement on Goleta Beach from the sand source location, characterize the biology of the sand source location, and provide evidence that the sand source location is the least environmentally damaging location for acquiring sand for replenishment at Goleta Beach.

Greenhouse gas emissions from the proposed beach nourishment program (e.g., number of truck trips) under this alternative should also be analyzed.

6. Please provide a table or figure showing the type and amount of habitat that may be potentially impacted from this alternative.

7. The DEIR should discuss potential mitigation due to loss of sandy beach from the Alternative 1 revetment.

Alternative 2 – Temporary Revetment Retention and Pilot Coastal Protection Projects with Beach Nourishment

1. Alternative 2 erroneously states that the use of hard surfaces for protection of the existing shoreline has not been included in this alternative.(p.7-34) However, this alternative proposes to retain the existing unpermitted rock revetment, which is a hard surface.

2. Please clarify whether this alternative proposes a 1,000 ft. long buried cobble berm and geotextile core dune system (p. ES-6) or a 250 ft. long cobble berm and geotextile core dune system (p.7-34)?

3. Please see the comments above regarding our request for additional information and analysis of a geotextile core dune and cobble berm.

4. Please provide information regarding the parameters of the proposed controlled pilot study for each of the beach protection measures proposed, including success criteria and monitoring, as well as provisions for removing the proposed experimental measures if unsuccessful.

5. Please describe what type of maintenance would be necessary for each of the experimental measures.

6. How will the results after 10 years of use of the experimental shoreline protective methods (buried cobble berm and geotextile core dunes, Pressure Equalizing Modules, and vegetative revetment) be analyzed to determine which experimental measure were successful or unsuccessful?

7. This section includes a discussion regarding ongoing beach nourishment projects. Please see the overarching comments above regarding the baseline for beach nourishment.

8. For the proposed beach nourishment, please provide a detailed strategy for minimizing, to the greatest extent possible, all adverse impacts to the kelp/eelgrass/surfgrass, rocky reef, shallow soft bottom subtidal, sandy beach (upper, mid, lower zones – epifauna and infauna for each zone including shorebirds), wrack, rocky intertidal, coastal strand habitats in the Goleta Beach area from all activities associated with sand replenishment. The strategy should include ecological considerations of timing, sensitive resource avoidance, sand deposition location, and enhanced habitat recovery, at a minimum. In addition, any plans for sand replenishment must identify the sand source location, provide

evidence of the suitability of the sand for placement on Goleta Beach from the sand source location, characterize the biology of the sand source location, and provide evidence that the sand source location is the least environmentally damaging location for acquiring sand for replenishment at Goleta Beach. Greenhouse gas emissions from the proposed beach nourishment program (e.g., number of truck trips) under this alternative should also be analyzed.

9. Please provide a table or figure showing the type and amount of habitat that may be potentially impacted from this alternative.

10. Alternative 2 includes a number of project components, including installation of experimental shoreline protection methods, including buried cobble berm and geotextile core dunes, Pressure Equalizing Modules (PEMs) and a vegetative revetment. What is the proposed sequence of construction / installation of the components in this alternative? Are there any important timing triggers that will initiate certain components?

Alternative 3 – Westward Managed Retreat Program Alternative (2015-2050)

1. The DEIR has identified Alternative 3 as the environmentally superior alternative. However, Commission staff advises against retaining the existing unauthorized rock revetment and strongly recommends that the County pursue alternatives other than hard armoring of the coast. Commission staff recommends against retaining the unauthorized rock revetment for a “temporary” or extended length of time. The unauthorized rock revetment should be promptly removed. Then, as necessary, managed retreat measures may be implemented (see requested alternatives analysis, below).

2. Biological Resources. The DEIR should be revised to accurately identify potential biological impacts associated with the proposed revetment under Alternative 3. Alternative 3 proposes to retain in place the 1,200 ft. long existing unpermitted revetment for up to 20 years, or though the next major winter storm season when they come exposed. (p. 7-53). Then, when required, construct a buried revetment that would total approximately 2,300 linear feet along the seaward edge of the coastal process zone (historic back beach) from the existing restaurant to the western edge of the Park. (p.7-53) Alternative 3 also proposes a new 250 ft. rock revetment to protect the GSD pipeline and vault. (p.7-53) The new buried revetment would be located approximately 4 ft. to 43 ft. landward of the existing revetment location. (Figure 7-4) The DEIR states that, “if the positive PDO and associated severe El Nino storms extend over multiple seasons and combine with future sea level rise to cause continuing erosion, revetment exposure could be more extensive.” (p.7-57). Further, according to the DEIR, “prolonged exposure of the revetment would potentially contribute to or accelerate conversion of sandy beach to intertidal beach or open water through passive erosion.” (p.7-65). However, the discussions of biological impacts from an exposed revetment in Alternative 3 are not analyzed in the DEIR. The DEIR concludes that “during erosional periods and over the long term, gradual widening of the beach associated with the erosion of the developed parkland and the relocation of the revetment would incrementally increase beach habitat at Goleta Beach County Park, similar to that described for the proposed Project.”

(p.7-60) Please provide supporting information for that conclusion or revise the DEIR to provide a thorough description of potential biological impacts from the proposed revetment in Alternative 3.

3. Coastal Processes. This Section does not provide an analysis as to what the potential impacts would be from the new proposed 2,300 ft. long revetment on beach narrowing or downcoast transport over time or from retention of the unauthorized as-built revetment for a period of time up to 20 years. Please provide an analysis of how the new 2,300 ft. long revetment and the as-built revetment that would be retained for up to 20 years may impact coastal processes given different potential climatic conditions. Although the DEIR states that "the location of the revetment along the historic back beach…limits the potential duration and degree of future exposure," the very next discussion in the DEIR describes the vulnerability of that area to erosion. (p.7-72 to p.7-73) Furthermore, the DEIR explains that such "armoring could periodically inhibit vertical and lateral beach access during periods of revetment exposure, limit sand storage capacity along the beach by fixing the shoreline, and incrementally contribute to sediment loss within the Santa Barbara Littoral Cell." (p.7-13) Please provide an analysis for prompt removal of the as-built revetment as part of this alternative and an analysis for the need of the proposed "backstop" protection" including the reconstruction of a new revetment or other shoreline protection device in a further landward location. This analysis should evaluate whether such a backstop should be constructed at the time the existing revetment is removed or at some point in the future.

4. Recreation. This Section does not differentiate between the recreational impacts from the future exposure of the rock revetment itself (i.e., crossing over rock to access the beach) versus the potential future impacts from loss of beach sand due to an exposed revetment fixing the shoreline. Please include an analysis to explain these potential impacts.

5. The DEIR should discuss potential mitigation due to loss of sandy beach from the Alternative 3 revetment.

6. Please provide a table and figure showing the type and amount of habitat that may be potentially impacted from this alternative.

Additional Alternative:

All of the proposed alternatives in the DEIR replace the unpermitted revetment with some alternative armoring. The identified cycle of erosion and recover at Goleta Beach strongly suggests support for relocation of the utilities to a safer inland location, combined with an adaptive retreat or managed retreat for the coming decades. In order to balance the need to protect both the upland area and the sandy beach area of the park in a manner consistent with the policies and provisions of both the County's certified Local Coastal Program and the Coastal Act, we request that the County evaluate the following alternative:

Adaptive Management/Phased Approach: Please evaluate an alternative for an adaptive managed retreat approach to: (1) immediately remove the existing unpermitted rock, (2) relocate the utilities to the utility corridor or the highway

corridor, (3) relocate the GSD vault and outfall pipeline landward to avoid the need for construction of new shoreline protection or relocate to a location where those structures will be protected by the existing permitted rock revetment, (4) allow for minor repair/reconstruction of existing upland areas of park that are subject to infrequent periodic erosional events, and (5) as upland areas of the park become subject to more frequent erosive events and wave action due to sea level rise, implementation of a detailed, well-planned phased approach to managed retreat that includes a "Managed Retreat Implementation Plan" (MRIP) (discussed throughout the DEIR as a mitigation measure). Rather than immediately remove parking areas or other park infrastructure (restrooms, picnic tables, etc.), a phased plan would keep these facilities as long as possible and respond incrementally by removing/relocating the more seaward structures first as erosion occurs over the short-term and long-term outlined in a MRIP. This alternative should include figures/site plans showing potential new locations for all facilities and structures proposed for relocation.

A phased approach should include an action plan such that when certain site conditions (triggers or thresholds) occur, certain adaptive actions would follow, as already partially described for an MRIP on p. 4.10-31 through 33 of the DEIR. For example, for each threatened structure, an analysis could be undertaken of the importance and need for the structure given the usage of the park. Is the structure integral to the functioning of a coastal dependent use or other need? What will happen if the structure is either destroyed or removed and not replaced? For each of those structures or facilities that have been demonstrated to be threatened and, what are the options for moving the structure out of the coastal processes zone or mitigating the loss of the structure. For example if parking spots are lost is there nearby parking, what percentage of parking spots are used, is it necessary to replace parking at this exact location, are there options for shuttling or increasing parking offsite? Is there an option for removal of the seaward most picnic benches and barbeques prior to major storm events? Are there natural ground covers that can be used for picnics and other park activities that are less prone to erosion than lawn? A managed retreat implementation plan should plan to address many different scenarios.

We appreciate the opportunity to comment on the Draft EIR for the Goleta Beach County Park Managed Retreat Project 2.0 and we look forward to working with the County on the subsequent submittal of a CDP application to the Commission. Please contact me if you have any questions or concerns regarding these comments.

Sincerely,

Amber Geraghty

A. Amber Geraghty
Coastal Program Analyst

Cc: Jack Ainsworth, Senior Deputy Director, CCC
Steve Hudson, District Manager, CCC
Shana Gray, Supervisor, CCC