HEAL THE OCEAN

1430 Chapala Street, Santa Barbara, CA 93101;
PO Box 90106, Santa Barbara, CA 93190; Telephone (805) 965-7570; fax (805) 962-0651
www.healtheocean.org

September 14, 2017

Selena Evilsizor
County Planning
123 East Anapamu Street
Sacramento, CA 93101

Re: Santa Barbara County Coastal Land Use Plan – Coastal Resiliency Policies

Dear Ms. Evilsizor:

Heal the Ocean has been actively involved in climate change policy discussions at County/City/State levels for a number of years, particularly in the area of adaptation - i.e. preparing for sea level rise, and we have long advocated for policy change as it relates to planning in the coastal zone in Santa Barbara County..

General Comment:
HTO agrees Revisions are vital to the relevance of the Santa Barbara County Coastal Land Use Plan (Draft Policy), in that rising seas and associated flooding hazards must be prepared for sooner rather than later, and that building permits approved today must consider where that building will be tomorrow in relation to a rising ocean (and the attendant rising groundwater). These proposed policy updates is a start to an updated policy for County operations and planning procedures in relation to rising seas – but much more needs to be done.

Specifically, there is a glaring lack of attention to infrastructure protection in the face of a rising ocean. Land Use Policies for protecting, monitoring and preparing at-risk County infrastructure in the coastal zone must be enlarged upon in the Coastal Land Use Plan ("Plan") for it to reflect the findings of The *Sea Level Rise & Coastal Hazards Vulnerability Assessment* (July 2017) prepared by County of Santa Barbara Long Range Planning Division with the expert guidance of Revell Coastal, among others. In fact, even now in Santa Barbara County buildings and industrial infrastructure are facing the threat of sea level rise, i.e., ocean run-up to coastal park areas, salt-water intrusion into groundwater basins, and threats to roadways, railroad infrastructure, and the like.

In particular, new policies must be drafted to address those industries that rely on proximity to the ocean to operate - i.e. coastal Wastewater Water Treatment Plants (WWTPs). The recent collapse of the Goleta Sanitary District (GSD) Vault at the edge of Goleta Beach, which has required an emergency Coastal Commission permit to fix - is a dramatic case in point. The

Vault is that structure that houses the connection of GSD wastewater flow to the outfall pipe that then goes more than a mile out to the ocean.

The *Sea Level Rise & Coastal Hazards Vulnerability Assessment* ("Vulnerability Assessment") is an exhaustive, multi-year study undertaken by numerous agencies that specifically outlines, with maps, the threats posed by sea level rise to wastewater infrastructure as well as septic systems in the County coastal zone. The Draft **Santa Barbara County Coastal Land Use Plan – Coastal Resiliency Policies** fails – alarmingly – to reflect some very important callouts within the Vulnerability Assessment on these two issues, and there must be new categories inserted within the Coastal Land Use Plan dedicated to protection of wastewater infrastructure and updated policy regarding placement of septic systems in the coastal zone.

The *Vulnerability Assessment* notes that, "by 2100, 8.1 miles of sewer main, the Summerland Sanitation (sic) District Wastewater Treatment Plant, 670 parcels with septic systems, and 643 manholes may be subject to the coastal hazards of erosion and flooding" with no coastal armoring (p. 4-21). It also states that by 2100 207 sewer manholes and 4.78 miles of sewer mainlines in Carpinteria (Carpinteria Sanitary District) and 18 manholes and 0.94 miles of mainline in Goleta (Goleta Sanitary District) will be affected should there be no coastal armoring (p. 4-41).

When the Vulnerability Assessment states that an *entire wastewater treatment plant* is at risk of flooding hazards due to sea level rise, it is *imperative* that the County Planning document reflects the severity of the situation, and add language to the Coastal Land Use Plan to address it!

Septic systems and wastewater infrastructure must be inserted into the Draft **Santa Barbara County Coastal Land Use Plan – Coastal Resiliency Policies,** under their own subheadings, with particular policy recommendations, before this Draft Coastal Land Use Plan can be certified.

HTO notes here that while public recreation is given importance in the Draft Plan, all infrastructure in those same areas should be given similar attention – if not more. At the Goleta Beach Park alone, at-risk infrastructure besides the Vault includes a 4-inch Sanitary Sewer Force Main, a County of Santa Barbara 3-inch domestic water line; a Verizon 1-inch telephone conduit; a Goleta Water District 18-inch reclaimed water line; a Sempra Energy/Southern California Gas 8-inch high-pressure line.

These and other critical public infrastructure must be protected, and in fact should be given priority over recreational facilities in the Policy Revisions to Santa Barbara County's Coastal Land Use Plan

Specific Comments:
Changes to Existing Policies

Policy 3-4:
[Building standards policy][*"…unless such a standard* [75 years] *will make a lot unbuildable, in which case a standard of 50 years shall be used; otherwise determined on a case-by-case basis for public infrastructure)". (pg. 2)*

Buildings are supposed to last longer than 75 years - and 50 years is ridiculous. To illustrate: under these proposed guidelines, a building constructed in 1942 will have outlived its useful life; at 50 years, a building constructed in 1967 could be flooded. The Draft Policy should remove all mention of 75 years, 50 years, or 25 years and instead prepare planning requirements for structures that will be affected by future flooding based on worst-case projections. Construction requirements such as pylons, retaining walls, etc., should be added as a requirement of permit approval. (Note: Mexico City was built on a lake, and required massive pylons and other water-resistant infrastructure, so building in a flooded/coastal zone is not impossible, but it must be *planned for*, which is the whole purpose of the Draft Policy!.)

Policy 3-8:
[For development in areas of known geologic hazards] *"The analysis shall be prepared by a qualified California licensed professional…The analysis shall identify any hazards affecting the proposed project based on the best available science, any necessary mitigation measures, and contain substantial evidence that the project site, with mitigation, is suitable for the proposed development" (pg. 3)*

An analysis by a licensed professional is an obvious requirement to determine what mitigation measures are necessary to certify a property for proposed development in areas exposed to wave run-up, tsunami run-up landslides, beach or bluff erosion or other geologic hazards – and obviously an expert opinion has to be required in areas vulnerable to sea level rise. However, a site vulnerable to sea level rise should be subjected to a determination as to whether to that site is suitable for development at all. Criteria should be developed for suitability certification for development, accompanied with exhaustive mitigation measures should the property be deemed allowable for development.

No development should be allowed that will result in increased flood discharge to adjacent areas/property.

Policy 3-11:
[All development is prohibited in the floodway] "*…unless certification by a registered professional engineer is provided demonstrating that encroachments shall not result in any increase in flood levels during the occurrence of the base flood discharge". (p. 4)*

As per statement above (Policy 3-8) there should be no development in a floodway that will increase flood levels.

Policy 3-11:
[All development is prohibited in the floodway] *"Development is permitted within areas identified as potentially subject to future flooding as sea levels rise (as identified on the Santa Barbara County Coastal Hazard Screening Maps) provided that:*

A hazards analysis is prepared using locally-relevant sea level rise projections (i.e. low, medium, and high sea level scenarios) to determine potential site- or project-specific hazards ;"(p.4)

As stated, a determination should be made as to whether development should be banned in areas subject to future flooding; at the very least, a strong hazards analysis should be required for such sites by a professional geologist or engineer, along with a requirement that the developer produce appropriate insurance documents protecting surrounding properties.

Policy 7-4:
[Beach park development] *"As County beach park development plans are updated, they shall incorporate measures to adapt to sea level rise over time and provide for the long term protection and provision of public improvements, coastal access, public opportunities for coastal recreation, and coastal resources including beach and shoreline habitat. ~~Where feasible, any facilities that are removed or reduced to address carrying capacity should be replaced at an appropriate location, to ensure public access and recreational resources are protected and enhanced~~.(pg. 6)*

The reality of sea level rise is that recreational sites and facilities may not be replaceable elsewhere. Suggest strikeout of language as indicated above. Substitute "will" with "where feasible."

Potential New Coastal Land Use Policies

No. 2: Hazards: Real Estate Disclosures
[Notice to Property Owner (NTPO)] *"…property owners shall record a Notice to Property Owner (NTPO). The NTPO must notify current and future property owners of current and future hazards associated with sea level rise, including accelerated coastal bluff retreat, erosion, wave run up, and flooding/inundation."(pg. 7)*

This proposed policy is <u>crucial, and long overdue</u>. Full disclosure should require this! A prospective buyer of a property has the right to know if the property will be underwater in a matter of years.

No. 4: Setbacks for Beachfront Development
[Beachfront hazards] *"New beachfront development…shall be set back a sufficient distance to ensure that the new beachfront development will be located outside of areas subject to existing or reasonably foreseeable shoreline hazards…over the anticipated life of the development (minimum of 75 years for single family residences and commercial structures, unless such standard will make a lot unbuildable, in which case a standard of 50 years shall be used)" (p.7-8)*

The 50 year standard is totally unsuitable. As mentioned, a building should last longer than 50 years, but beyond that, Sea Level Rise is occurring at a rate faster than predicted by experts. A property that cannot be held to a reasonable lifetime standard should not be developed.

No. 8: Impacts to U.S. Highway 101 from Sea Level Rise
[Highways in the Coastal Zone] *"The County should consult with the California Department of Transportation to protect access to the coast and to minimize impacts of sea level rise on U.S. Highway 101…A combination of structural and non-structural measures to protect local and regional access and use of Highway 101 should be considered with a preference towards non-structural solutions, unless the structural solutions are less environmentally damaging." (pg. 9)*

A map of vulnerable highway/roadways adjacent to the ocean should be developed immediately, with particular zones called out for immediate planning action. The Draft Policy should refer to the County's Vulnerability Assessment maps to see where these areas are.

Further, railways MUST be added to this section. Railways are a critical aspect of transportation and economy in Santa Barbara County, not to mention the State of California. A collapse in Santa Barbara County means a collapse of connection between north and south California. Railroad infrastructure is already at risk of sea level rise-related hazards in several parts of the County, notably the Summerland area. The Policy must include a map of vulnerable railroad infrastructure, together with a plan for those vulnerable areas, if not all coastal rail lines. These areas are also included in the Vulnerability Assessment.

Conclusion:
The most glaring omissions from the Draft Santa Barbara County Coastal Land Use Plan, as outlined above – wastewater infrastructure, septic systems, highways and railroads – must be addressed before the Draft Plan is considered final. Heal the Ocean looks forward to a redraft of **Santa Barbara County Coastal Land Use Plan – Coastal Resiliency Policies** and will state for the record that if the Draft Plan is certified in its present form we will have to object.

Sincerely,

Hillary Hauser, Executive Director

Alex Bennett, Policy Analyst