

June 30, 2010

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

Re: Goleta Beach 2.0

Dear Honorable Supervisors:

This letter is submitted by the Environmental Defense Center ("EDC") on behalf of the Santa Barbara Chapter of the Surfrider Foundation ("Surfrider"). EDC is a public-interest law firm which protects and enhances the environment through education, advocacy and legal action. Surfrider is a non-profit environmental organization dedicated to the protection and enjoyment of the world's oceans, waves and beaches for all people, through conservation, activism, research and education. EDC and Surfrider strongly support County Parks Department's Goleta Beach 2.0 as an effective way to preserve and enhance Goleta Beach County Park while protecting and enlarging Goleta Beach.

Goleta Beach County Park is a community treasure and the most visited park in the County. Goleta Beach 2.0 resolves a long-standing community dialogue about the best way to preserve the Park for future generations. This innovative new plan fully protects the Park in a manner consistent with county and state coastal policies. The new concept protects the sensitive beach environment while improving the Park for visitors by enhancing the recreational amenities. Goleta Beach 2.0 is a win-win solution which we are confident the Coastal Commission will support.

We urge the Board of Supervisors to initiate engineering analysis and environmental review for Goleta Beach 2.0 and to direct staff to proceed with a project which relocates the utility lines from within the critical erosion zone to a location as far out of harms way as possible. The Board should direct staff to pursue all available means to relocate the sewer and utility lines into CalTrans' Highway 217 right-of-way, if possible, to avoid the potential for sewage spills on Goleta Beach and to lessen the future prospects for installation of a rock revetment or a seawall.

Goleta Beach 2.0

Goleta Beach 2.0 is a practical solution to a decade-old problem. The community has spent countless hours and millions of dollars trying to protect utility lines, parking and other infrastructure located in the erosion zone. The new plan relocates some parking spaces and the utility lines outside of the erosion zone. It is far less expensive than prior proposals. Parking spaces will be accommodated onsite and offsite with a shuttle, interpretive trail and water taxi.

Goleta Beach 2.0 removes unpermitted rock walls as required by Coastal Commission permits. This action will improve access between the lawn and the sandy beach and will help restore a healthy beach.²

Realignment of the bike path and entrance road will improve bicycle and pedestrian safety. The project includes numerous other recreational upgrades including kayak rentals and expanded Park Host and Pier Host programs. We believe the biggest recreational improvement of all is the proposal to increase the size of Goleta Beach by over an acre.

The new plan includes beach nourishment to help maintain a wide sandy beach. However, unlike prior proposals, no structures would interrupt the movement of sand. Therefore far less beach nourishment (and dredging) is necessary to maintain a wide beach than would have been required under earlier proposals. This significantly minimizes the adverse air and water quality impacts, biological impacts, nourishment-related beach closures, and greenhouse gas emissions from dredging operations. This change will also reduce the ongoing cost of beach maintenance.

Coastal Policies

Goleta Beach 2.0 is consistent with Coastal Act and County Local Coastal Plan (LCP) policies. The Coastal Act and the County LCP require the County to avoid building structures (e.g. revetments and groins) on the beach when feasible alternatives

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¹ Goleta Beach County Park - Park Reconfiguration Alternative. Prepared for The Coastal Fund at UCSB, Surfrider Foundation – Santa Barbara Chapter and Environmental Defense Center. Prepared by Philip Williams & Associates, Ltd. November 24, 2008. See Table 2 on Page 15 comparing Park Reconfiguration Alternative and Beach Stabilization (Groin) Alternative. The report concludes that Park Reconfiguration (essentially Goleta Beach 2.0) costs \$1.2 million less than the Groin and finds "It is likely that any contingency nourishment required with the Pile Groin would include the eroded fillet volume (550,000 yds3) and the volume necessary to infill another erosion wave (~175,000 yds3). The cost of such a contingency is not included in cost estimating for the groin alternative and would may [sic] add an additional \$10.5M in nourishment costs to the 20 year total."

² Staff has assured us that (a) the utility lines will be moved inland as far as possible to protect the beach, and (b) no "backstop revetment zone" is planned. Given this, EDC and Surfrider will continue to fully support Goleta Beach 2.0 through the County and Coastal Commission approval process.

such as Goleta Beach 2.0 exist, especially when such structures would interfere with the movement of sand along the coastline. These laws favor relocation of threatened infrastructure.³ Goleta Beach 2.0 avoids structures on the beach, relocates threatened infrastructure, does not interfere with sand supply or sand movement, and is therefore the environmentally superior project which complies with Coastal Act and LCP policies.

Public and Expert Support

Goleta Beach 2.0 enjoys broad public support, as well as the support of coastal engineers and experts. The project concept was devised in part by County staff working with Dr. David Revell. Dr. Revell and his colleagues (engineers Jeremy Lowe and Bob Battalio from Philip Williams and Associates) conceived an early version of the plan. ⁴ The plan is also supported by Coastal Tech⁵, a coastal engineering form that works solely on coastal management and erosion issues. Dr. Edward Keller, the Chair of the UCSB Geology Department, peer-reviewed the Park Reconfiguration Alternative and supports this conceptual plan underlying Goleta Beach 2.0.

When the Goleta Beach issue was heard by the Coastal Commission on July 8, 2009, the Commission received over 540 letters in support of the Park Reconfiguration Alternative, which is similar to Goleta Beach 2.0. Groups including EDC, Surfrider, Heal the Ocean, Urban Creeks Council and More Mesa Preservation Coalition support Goleta Beach 2.0.

In addition, the Parks Commission voted to support the project in March. The Planning Commission and Board received many letters and postcards from community members and groups endorsing Goleta Beach 2.0 as the way forward. There is significant public support for Goleta Beach 2.0.

The Surfers' Point Model

Ventura County faced a very similar issue where a bike path and parking spaces were located in the erosion zone at the County Fairgrounds. A diverse stakeholders' group was formed. This group developed a consensus-based plan to relocate threatened infrastructure inland out of the erosion zone and to widen the beach. Ventura's Surfers' Point Project is very similar to Goleta Beach 2.0 and is an excellent model for what can be accomplished through collaboration between the community, County and the Coastal Commission. Funding was received this year and implementation is beginning this summer.

³ See e.g. LCP Policy 3-1 stating in part "The County prefers and encourages non-structural solutions to shoreline erosion problems."

⁴ <u>Goleta Beach County Park - Park Reconfiguration Alternative</u>. Prepared for The Coastal Fund at UCSB, Surfrider Foundation – Santa Barbara Chapter and Environmental Defense Center. Prepared by Philip Williams & Associates, Ltd. November 24, 2008.

⁵ See Letter from Michael Walther, Coastal Tech to Santa Barbara County Board of Supervisors. June 25, 2010.

Conclusion

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In closing, County staff has successfully developed the forward-thinking Goleta Beach 2.0 Project to protect and enhance Goleta Beach Park while expanding and preserving the beach. The new plan to preserve the Park is less costly than prior plans. It complies with coastal policies and minimizes environmental impacts. Goleta Beach 2.0 enjoys broad public support, was designed by coastal engineers and is backed by scientific experts, coastal managers, geologists and in concept by the Coastal Commission staff. The project embodies a wonderful vision for maintaining Goleta Beach for future generations.

We therefore urge the Board of Supervisors to formally initiate review of the Goleta Beach 2.0 Project. Further input from the community can be addressed during the environmental and public review processes, and will fully inform the Board and the public regarding the environmental, policy and economic aspects of the proposed project. We look forward to working with the County to bring to fruition a long-term solution for Goleta Beach.

Sincerely,

Brian Trautwein, Environmental Analyst

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Santa Barbara Chapter Surfrider Foundation California Coastal Commission