



Surfrider Foundation

Ventura County Chapter

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RE: Comments on the DRAFT PROGRAMMATIC ENVIRONMENTAL IMPACT REPORT (DPEIR) FOR BEACON'S ADOPTED COASTAL REGIONAL SEDIMENT MANAGEMENT PLAN (CRSMP) FOR SANTA BARBARA AND VENTURA COUNTIES

PROJECT DESCRIPTION: *Of the 18 identified capital projects in the adopted CRSMP, 13 are included in the proposed project that were evaluated in the Draft Programmatic EIR (PEIR). The project comprises onshore and offshore developments and consists of sand management, dredging, sand deposition and grading, and the placement of offshore sand retention structures. The individual projects are identified below. A more detailed description of the project components is provided in the Draft PEIR.*

- 1) Oxnard Shores Sand Management.*
- 2) Regional Sediment Management Stockpile and Processing Center.*
- 3) Sand Retention Pilot Projects at: Arroyo Burro County Beach, Butterfly Beach, Summerland Beach, Santa Claus Beach, La Conchita Beach, North Rincon Parkway, and South Rincon Parkway.*
- 4) West Hueneme Beach Re-nourishment Longevity Improvement.*
- 5) North and South Rincon Parkway Shoreline Restoration.*
- 6) Sand Capture at Mugu Submarine Canyon*

GENERAL COMMENTS:

The basic premise that we need 'wider beaches' is flawed – many of the beaches in the region are naturally narrow, bluff-backed, beaches. “Beach erosion” is a result of poor land use planning, and in areas where coastal development has encroached into the coastal zone, damage to property and infrastructure are a predictable inevitability.

The proposed CRSMP capital projects mainly consist of expensive structural engineering and beach nourishment projects. To date, BEACON has not been able to attract the huge federal appropriations that it would take to implement the large-scale beach replenishment and sand retention projects described. 'Recycling' sand before it goes into Mugu Canyon, while in theory may make sense, is cost prohibitive and likely has environmental consequences to ocean ecosystems that may not be immediately evident.

Additional analysis is required for individual projects:

The EIR states that specific environmental analysis shall be required for future implementation of the proposed projects. The current descriptions are very general in nature, and more site-specific analysis will be required when a specific project is being considered.

EIR COMMENTS:

The EIR fails to consider alternative projects:

Although the EIR mentions other projects in the BEACON area, it only analyzes the proposed capital concepts without considering alternative management strategies. It is in the public interest to consider solving the root causes of coastal erosion, rather than attempting to engineer the shoreline with hard structures.

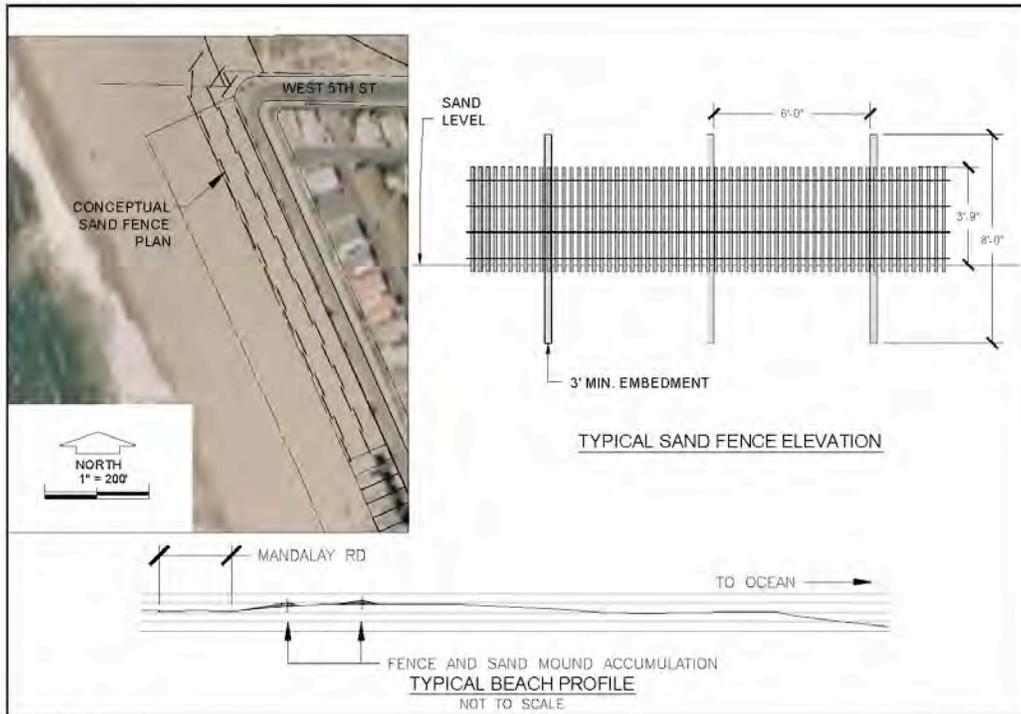
Such strategies should include:

1. **Managed Retreat:** A regional strategy should be developed to prioritize coastal infrastructure that will require future modification or protection and that which should be removed or relocated inland. Such a plan should consider the future impacts of sea level rise up to 1.4m in next 100 years and plan for the movement of critical infrastructure and utilities away from the shoreline.
2. **Flood Control and Land Use:** Traditional flood control activities impact coastal sediment supply as well as hydrology and water quality on a watershed scale. BEACON should engage in pro-active flood control reform measures such as those recently implemented in Santa Barbara County. Modification of debris basins and concrete channels will not only restore natural sand delivery to the coast, but can also improve habitat and water quality. Likewise, land use decisions can have a significant impact on coastal resources, including sediment supply. New development should be steered away from floodplains, and existing floodplain development should be phased out through incentive programs. Coastal development should have adequate setback to account for future erosion and rising sea levels.
3. **Reduced Scale Alternative:** the 'reduced scale' described in the EIR only considers smaller structures, not reduced spatial distribution of such structures. Reduced scale of an individual project may only serve to diminish the effectiveness of that project, and not reduce or eliminate negative consequences.

1) Oxnard Shores Sand Management.

This project is a road maintenance program to mitigate accumulation of blowing sand on the public street. The plan includes placement of sand fences that will trap sand, which will be periodically bulldozed back onto the beach.

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SOURCE: Noble Consultants Inc.

padre
associates, inc.
ENGINEERS, ARCHITECTS &
ENVIRONMENTAL SCIENTISTS
BEACON CRSPMP PEIR

SAND FENCE DETAILS
FIGURE 2.2-2

Comment: The sand fences should be aligned perpendicular to prevailing winds, rather than parallel to the road.

Alignment of sand fences shown in the EIR does not provide optimal sand capture and retention. Prevailing winds are from the West-Northwest, and taking advantage of this would reduce the number of fence panels and maintenance, as well as provide better beach access from the road.

Comment: The Sand Management Plan should consider using the sand fences to build permanent dunes.

This would be accomplished through establishing vegetation on the accumulated sand, and incrementally raising the sand fences to trap more sand over time. This would reduce ongoing maintenance, associated costs and impacts.

Comment: A comprehensive shoreline management plan is needed for Oxnard Shores.

In 1987 the City of Oxnard lifted a moratorium on beachfront construction that had been in effect since 1974 in response to damage to beachfront homes 1971. This was in

response to legal action from the Oxnard Shores Development Company, who owned 93 beachfront parcels. The resulting development, totaling many millions of dollars in real estate, will inevitably be threatened as sea levels rise and sand supplies become diminished by further urbanization along the Santa Clara River. Sand replenishment will not be technically or economically feasible to protect these new properties, and the public should not bear the cost of coastal structures nor the burden of the loss of public beach in favor of protecting private property.

See: http://articles.latimes.com/1987-12-31/news/ve-7916_1_oxnard-shores

Comment: Policy consistency of this management plan should be examined.

The Coastal Commission has applied stringent restrictions on the use of mechanized equipment at Pierpont Beach, in Ventura. This proposed plan for Oxnard Shores is inconsistent with that interpretation of the California Coastal Act.

2) Regional Sediment Management Stockpile and Processing Center.

(Note: This project component has been removed from consideration since CALTRANS claimed the site for their freeway-widening project.)

The stockpile center is part of the opportunistic beach fill program, which depends upon sources of beach compatible sand. The concept is to make use of public works (primarily flood control debris basin cleanout) or construction projects that generate sediment sources. Sediment would be delivered to this site for storage and sorting, in preparation for future beach deposition.

Comment: The 'opportunistic beach fill' program has potential negative consequences for water quality, while having limited potential for depositing a useful quantity of sand on the beach.

To date, BEACON has had difficulty finding upland sources of sand that meet the grain size criteria for beach replenishment. Upland sources typically have a high percentage of fine sediments. Relaxing these constraints to make such 'poor quality' material qualify for beach replenishment will have negative consequences for the beach. Dumping relatively small amounts of sediment with high percentage of fines will do nothing for the beaches except exacerbate turbidity, smothering nearshore habitat and degrading the recreational experience.

3) Sand Retention Pilot Projects and Structural Shoreline Management

The EIR identifies at least 11 potential offshore reefs:

- 3) Sand Retention Pilot Projects at: Arroyo Burro County Beach, Butterfly Beach, Summerland Beach, Santa Claus Beach, La Conchita Beach, North Rincon Parkway, and South Rincon Parkway
- 4) West Hueneme Beach Re-nourishment Longevity Improvement.
- 5) North and South Rincon Parkway Shoreline Restoration.
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BEACON CRUMP PEIR

SAND RETENTION PILOT PROJECT
-SUMMERLAND BEACH
FIGURE 2.2-7

This figure shows a typical 'Multi-purpose Offshore Reef' design from the BEACON CSMP.

Comment: More site-specific information is needed for complete environmental review.

Each of the proposed locations have specific biological and recreational resources that are not fully identified in this Programmatic EIR. Further analysis is required for the site-specific designs and impacts.

Comment: Offshore reefs are experimental measures that have yet to demonstrate effectiveness. It is premature to plan large-scale regional implementation of such measures.

The EIR does include a description of the proposed pilot project at Oil Piers. Until this project is implemented and monitored, it is impossible to adequately assess the potential impacts of large-scale deployment of similar structures. Recent experience on both the West Coast (i.e. [Pratts Reef](#)) and [elsewhere around the world](#) has demonstrated the difficulty associated with placing artificial reefs in the surf zone, and expenses associated with removal if they fail to perform or otherwise become a problem. Although

Oil Piers may be a good location to experiment with artificial reefs, it is premature to plan for regionwide deployment of similar structures.

Comment: Offshore reefs may be infeasible in sandy, high-wave climate beaches such as Hueneme beach and Point Mugu.

Southern Ventura County experiences high wave energy along a sandy shoreline. Experience with existing offshore breakwaters (i.e. Ventura Harbor) and experimental artificial reefs (i.e. Pratts Reef) has shown that such structures subside in soft sand and require considerable ongoing maintenance to maintain their design profile. Coupled with rising seas, this will likely become an expensive and marginally effective approach to increasing beach width.

Comment: EIR does not consider climate change impacts:

Recent studies and policy point to the need for addressing climate change. Specific to this document, sea level rise will have major implications for any of the measures described. For instance, the profile of an offshore reef is designed for sea level elevations, but this is a moving target. As sea levels rise, these offshore reefs will become less effective, requiring expensive maintenance and modifications.

Conclusion: The Surfrider Foundation is concerned that the capital projects proposed in the BEACON Coastal Regional Sediment Management Plan are expensive structural coastal engineering projects that are likely to provide marginal benefits while potentially further degrading our coastal resources.

Each of these projects should undergo more comprehensive environmental review for site-specific impacts.