



# *Surfrider Foundation*

Ventura County Chapter

PO Box 1028, Ventura, CA 93002 (805) 667-2222

Monday, April 20, 2009

City of Ventura  
City Council  
501 Poli St  
Ventura, CA 93001

**RE: Embassy Suites Hotel/T J Mian & Associates Mitigated Negative Declaration # 2278**

Dear Councilmembers;

The Surfrider Foundation has reviewed the MND for the proposed new four-story hotel to fill the vacant 2.74-acre parcel at the corner of Figueroa and Harbor Blvd. in Ventura. We are concerned that this project will not provide the long-term economic benefits as outlined in your staff report, and will increase the taxpayer burden to maintain the beach and coastal infrastructure.

**The MND does not address climate change impacts.**

The information that we have submitted to the Planning Commission, and that are also submitting here, provides evidence that significant climate change impacts may occur. Therefore, an environmental impact report must be prepared for this project.

***Impacts of the project on climate change:***

The MND does not address the impacts of the project on climate change. For instance, what is the expected greenhouse gas contribution from the proposed building? An assessment of the current occupancy rate of existing similar hotels in the city, and cumulative impacts from the operation of another large building should be conducted. Similar facilities include the Crown Plaza Hotel, Four Points Sheraton, and the Ventura Beach Marriot. Large hotels consume resources whether fully or partially occupied. It is unlikely that the planned facility will draw additional visitors to Ventura, but rather detract from occupancy at existing facilities, while increasing net emissions.

***Impacts of climate change on the project:***

***Flood Hazard Zone:*** The MND uses outdated 1986/1987 flood maps to assess the coastal hazard zone. This section of the document should be revised to reflect new information.

Although there is considerable uncertainty regarding the impacts of Climate Change, the State of California has passed AB 32, the Global Warming Solutions Act of 2006 that recognizes the threat of climate change. On March 11, 2009, the Pacific Institute released a report commissioned by the State that addresses potential impacts to the coast of California due to sea level rise as a result of climate change. Using a very conservative 1.4m increase in sea level elevation over the coming century, the study estimates that the cost of building new or **upgrading existing coastal structures is estimated to be at least \$14 billion** (in year 2000 dollars), with an



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additional \$1.4 billion per year in maintenance costs. The UN has predicted even greater and faster sea level rise, so this impact could be much greater.

Permitting a large development on the coast will increase the future need for taxpayer subsidies to protect this property. While we recognize the need for re-vitalization of the local economy, we want to ensure that the true cost of coastal development is not passed on to future generations.

### ***Coastal Infrastructure Shortfalls:***

Although the beaches of Ventura are considered a valuable community asset, funding is often not available to maintain this asset. Examples include:

Surfers Point Improvements (CIP 93959)	\$ 9,800,000
Promenade Beach and Stair Improvements (CIP 93980)	<u>\$ 3,653,000</u>
	\$13,453,000

Other underfunded programs include ongoing Pier Maintenance and Repairs, the Pierpont Sand Management program, as well as Beach Water Quality Improvements. The current combined shortfall/taxpayer burden for maintaining our beaches is well over \$10 million. As the Pacific Institute report suggests, this cost will increase in the future as sea level rise increases the extent of damages.

In 1969, the Crown Plaza Hotel (formerly Holiday Inn) was constructed concurrently with the Promenade and seawall. Did this development help fund the promenade and seawall?

We suggest that, if this project is approved, a mitigation bank be established to provide funding for coastal maintenance. Tax revenues or a separate coastal mitigation fee should be established for all new commercial development within the future inundation zones of the California coast. Alternatively, the project should be bonded to provide funds for its removal, should that become necessary in the future.

Note that there is already precedence for coastal funding in other coastal communities. For instance, the City of Santa Barbara designates a portion of their Transient Occupancy Tax to fund clean water projects.

### ***Planning for the future:***

On April 9, 2009, the California Coastal Commission conducted a workshop on Sea Level Rise. The presentation included recommendations that the commission take action immediately to evaluate how to address sea level rise impacts by:

- | Evaluating future development and redevelopment setbacks
- | Evaluate permitting of future structures
- | Update hazard requirements of LCPs and LUPs



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The City of Ventura is already leading the way with the Surfers Point Managed Retreat project which will become a demonstration for relocating damaged coastal infrastructure. In the future, the city's Surfers' Point parking lot will also be affected by coastal erosion. It may become necessary to relocate this popular facility to maintain beach access as required under the California Coastal Act. But if the shoreline is fully developed there will be nowhere to go, and the public will lose coastal access.

It is clear that coastal development is not 'free.' The future burden for maintenance of our beaches and coastal infrastructure should not fall on the taxpayer. There is currently no mechanism in the City of Ventura to fund the beaches, which always seem to come last on the list of priorities.

For the reasons outlined above, it is necessary that a full Environmental Impact Report (EIR) be completed for this project.

Sincerely,

A. Paul Jenkin  
Environmental Director, Surfrider Foundation - Ventura County Chapter  
(805) 648-4005 pjenkin@sbcglobal.net

ref: Surfrider Comments to Planning Commission, March 12, 2009

cc: California Coastal Commission, 89 S California St # 200, Ventura, CA 93001



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PO Box 1028, Ventura, CA 93002 (805) 667-2222

March 12, 2009

City of Ventura  
Planning Division  
501 Poli St  
Ventura, CA 93001

**RE: Embassy Suites Hotel/T J Mian & Associates Mitigated Negative Declaration # 2278**

The Surfrider Foundation has reviewed the MND for the proposed development. The project proposes a new four-story hotel to fill the vacant 2.74-acre parcel at the corner of Figueroa and Harbor Blvd. in Ventura.

**We are concerned that the MND does not adequately address impacts on coastal resources due to climate change.**

Although there is considerable uncertainty regarding the impacts of Climate Change, the State of California has passed AB 32, the Global Warming Solutions Act of 2006 that recognizes the threat of climate change. On March 11, 2009, the Pacific Institute released a report commissioned by the State that addresses potential impacts to the coast of California due to sea level rise as a result of climate change. Using a very conservative 1.4m increase in sea level elevation over the coming century, the study estimates that the cost of building new or upgrading existing coastal structures is estimated to be at least \$14 billion (in year 2000 dollars), with an additional \$1.4 billion per year in maintenance costs. The UN has predicted even greater and faster sea level rise, so this impact could be much greater.

Permitting such a large development directly on the coast will increase the future need for taxpayer subsidies to protect this property. We suggest that, if this project is approved, a mitigation bank be established to provide funding for coastal maintenance. Tax revenues or a separate coastal mitigation fee should be established for all new commercial development within the future inundation zones of the California coast. Alternatively, the project should be bonded to provide funds for its removal, should that become necessary in the future.

While we recognize the need for re-vitalization of the local economy, we want to ensure that the true cost of coastal development is not passed on to future generations.

Sincerely,

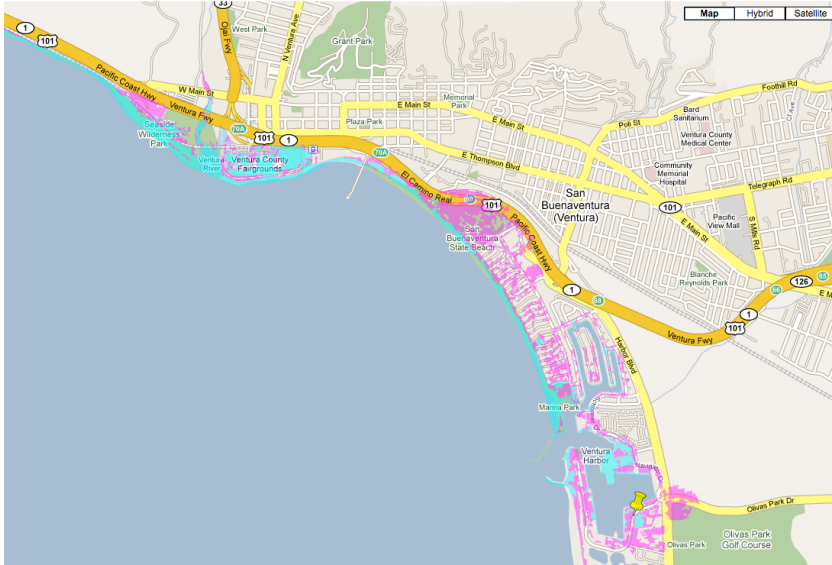
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### Hazard Zones

- Area at risk from a 100-year coastal flood event
- Current area at risk
- Area at risk with a 1.4 meter sea-level rise
- Erosion
- Area at risk from erosion in 2100 with a 1.4 meter sea-level rise (Draft, subject to further review)

### Data Layer Opacity

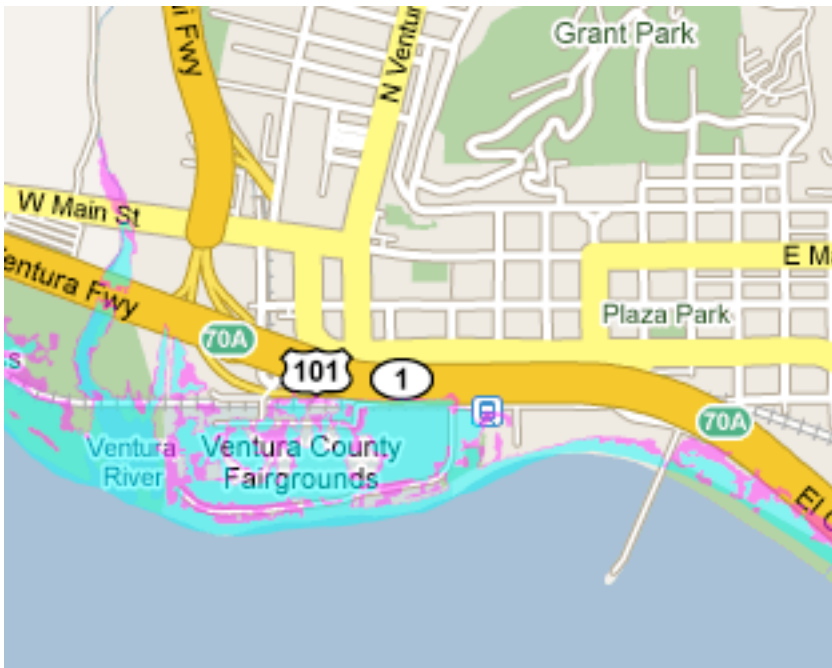
- 1/4
- 1/2
- 3/4
- Solid

### Infrastructure at Risk

- Health-care facilities
- Schools
- Police stations
- Fire stations
- Wastewater treatment plants
- EPA-regulated sites

### Disclaimer

This information is being made available for informational purposes only. Users of this information agree by their use to hold harmless the State of California, and its respective officers, employees, agents, contractors, and subcontractors for any liability associated with its use in any form. This work shall not be used to assess actual coastal hazards, insurance requirements, or property values and specificity shall not be used in lieu of Flood Insurance Studies and Flood Insurance Rate Maps issued by the Federal Emergency Management Agency (FEMA).



Reference: **The Impacts of Sea-Level Rise on the California Coast**, California Climate Change Center, March 2009 CEC-500-2009-024-D, [http://www.pacinst.org/reports/sea\\_level\\_rise/](http://www.pacinst.org/reports/sea_level_rise/)

## Los Angeles Times

[http://www.latimes.com/news/science/environment/la-me-global-warming-searise12-2009mar12,0,2405277\\_story](http://www.latimes.com/news/science/environment/la-me-global-warming-searise12-2009mar12,0,2405277_story)  
From the Los Angeles Times

### California panel urges 'immediate action' to protect against rising sea levels

Global warming is projected to cause ocean levels to rise up to 55 inches this century. Report urges considering abandonment of some coastal areas and halting insurance subsidies in flood-prone areas.

By Margot Roosevelt

March 12, 2009

As California officials see it, global warming is happening so there's no time to waste in figuring out what to do.

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**FOR THE RECORD:** The headline on an earlier version of this article said a state report projected that ocean levels could rise 55 inches or more by the end of the century. The report actually projected ocean levels to rise as much as 55 inches. The headline also said the report recommended moving state infrastructure inland. The report did not recommend that, but it detailed coastal roads, schools, sewage and power plants that would be in danger of flooding.

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California's interagency Climate Action Team on Wednesday issued the first of 40 reports on impacts and adaptation, outlining what the state's residents must do to deal with the floods, erosion and other effects expected from rising sea levels.

Hundreds of thousands of people and billions of dollars of Golden State infrastructure and property would be at risk if ocean levels rose 55 inches by the end of the century, as computer models suggest, according to the report.

The group floated several radical proposals: limit coastal development in areas at risk from sea rise; consider phased abandonment of certain areas; halt federally subsidized insurance for property likely to be inundated; and require coastal structures to be built to adapt to climate change.

"Immediate action is needed," said Linda Adams, secretary for environmental protection. "It will cost significantly less to combat climate change than it will to maintain a business-as-usual approach."

Few topics are likely to be more contentious than coastal development. But along the state's 2,000-mile shoreline the effects would be acute, particularly in San Mateo and Orange counties, where more than 100,000 people would be affected, according to the 99-page [state-commissioned report](#) by the Oakland-based Pacific Institute.

[Detailed maps of the coastline](#), published on the institute's website, show that residential neighborhoods in Venice and Marina del Rey could find themselves in a flood zone. Water could cover airports in San Francisco and Oakland, parts of the ports of Los Angeles and Long Beach, and large swaths of Huntington Beach and Newport Beach.

Roads, schools, hospitals, sewage plants and power plants may have to be relocated. More than 330 hazardous waste sites are at risk from floods.

"The rising sea level could be California's version of Hurricane Katrina," said Michael Woo, a Los Angeles planning commissioner and urban planning professor at USC. "Taxpayers and insurance ratepayers might question their responsibility to help homeowners and businesses which knowingly build in high-risk coastal areas."

California's far-reaching [adaptation initiative](#) reflects an emerging global consensus: Scientists can argue over how fast the Earth is heating up and diplomats can wrangle over emissions caps, but politicians must begin planning for the certainty of climate change.

Dozens of world-class scientists and economists, many from the University of California and state research institutes, are examining potential effects of warming on snowpacks, wildfires, crops and electricity demand.

Further reports will examine climate effects on hospital admissions, mortality rates, pollution and the habitats of the state's animals and plants. Dutch experts have been consulted on how to armor the coast with improved dikes and sea walls -- controversial measures that some experts contend will only increase erosion.

Detailed studies, now undergoing peer review, are to be released over the next month. Then the Climate Action Team is to send a comprehensive report to Gov. Arnold Schwarzenegger.

Sea levels along California have risen an average of about 8 inches in the past century. According to the Pacific Institute report, 260,000 Californians already live in flood zones, but are assumed to be protected by existing levees and sea walls. A rise of 1.4 meters (55 inches) would increase the population at risk to 480,000. Currently, 1,900 miles of roads and highways are at risk of flooding, which would grow to 3,500 miles

under the sea level rise projections.

The report estimated that one adaptation strategy, armoring the coast with 1,100 miles of new or modified sea walls and levees, would cost at least \$14 billion to construct, and another \$1.4 billion a year to maintain.

The report's estimate of 1 to 1.4 meters of sea level rise by the end of the century was calculated using two scenarios envisioned by the United Nations' Intergovernmental Panel on Climate Change, a gathering of the world's top climate scientists. One scenario assumes countries will cut their emissions of planet-heating greenhouse gases, and another assumes a business-as-usual release level.

Despite more than a decade of warnings from scientists, global emissions continue to rise, fueled by rapid population growth and economic development in such nations as China and India. Unless greenhouse gases are cut significantly, Earth's temperature is expected to increase between 4 and 6 degrees Celsius by the end of the century, according to the U.N. panel.

As water warms due to rising air temperatures, it expands, causing the sea level to rise. But another major factor, the melting of the Greenland and [Antarctic ice sheets](#), was unaccounted for in the U.N. panel's models because of uncertainty over effects and timing. Those models were designed in the mid-1990s.

Ice sheet melting has since accelerated. Dan Cayan, a researcher at the Scripps Institution of Oceanography and a lead scientist on the state's action plan, said the 55-inch estimate in the report is "probably conservative. . . . As temperature climbs, melting is going to proceed at a greater pace. It is not necessarily going to proceed linearly, in the same proportion as it did in the past, because melting begets more melting."

Low-income people will be disproportionately vulnerable to sea level rise, according to the report.

In Alameda County, 66,000 residents would be affected by flooding, of whom 60% are African American, Latino and Asian, the report said.

Mary Nichols, chairwoman of the state's Air Resources Board, which is charged with implementing a [statewide plan](#) to cut greenhouse gas emissions, called the sea level report "blunt but realistic."

"The recommendations are sensible: Defend what is worth protecting, move what can reasonably be moved, try to avoid doing further harm, consult affected communities, prepare to respond to emergencies."

Environmentalists hailed the report as a call to action.

"We can't pretend that the future will behave like the past," said Matt Vander Sluis of the Planning and Conservation League. "The ostrich has to take its head out of the sand or, in this case, it's going to be underwater."

margot.roosevelt @latimes.com

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