



Surfrider Foundation

Ventura County Chapter

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Paul Calderwood, Senior Planner
City of Ventura, Planning Division
501 Poli Street, Room 117
Ventura, CA 93110

February 2, 2003

RE: “Surfers Point Managed Shoreline Retreat” Draft Environmental Impact Report

Dear Mr Calderwood:

Enclosed are our comments on the “Surfers Point Managed Shoreline Retreat” Draft Environmental Impact Report, as well as a letter from the National Office of the Surfrider Foundation.

As you know, the Surfrider Foundation has been part of the Surfers Point Working Group since its inception in 1995. In fact, the founding members of the Surfrider Foundation participated in a “Surfers Workshop” way back in 1987, when the bike path and parking lot were originally being planned. Our organization remains committed to a long-term solution to the coastal erosion problems that resulted from the construction of these popular facilities, just as we have for the past 15 years.

The Surfrider Foundation strongly supports the concept of “Managed Retreat” as it applies to relocating damaged infrastructure inland. We also support the conceptual “Preferred Alternative” identified in the Draft EIR.

However, we do have significant concerns relating to specific design details within the Preferred Alternative, as well as the disclosure of environmental impacts associated with all of the alternatives presented in the EIR. These issues are discussed at length in our written comments, along with proposed mitigation measures and suggestions for the Final EIR.

We have consistently worked in good faith to provide timely and technically sound input to this process. Our comments on this Draft EIR reflect our commitment to our local surf break and the community that relies upon this resource.

We hope that our comments at this time are helpful, and we request that our input be solicited and considered during the Final Design process. Please contact me with any questions.

Sincerely,

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Surfrider Foundation comments on Surfers Point Managed Shoreline Retreat Draft Environmental Impact Report

I. Summary of Surfrider Foundation concerns:

Upon review of the “Surfers Point Managed Shoreline Retreat” Draft EIR, we have several very significant concerns about the Environmental Impact Analysis. We present a summary of these here, followed by some brief general comments and an in-depth discussion by section below.

We believe the following measures would incur Significant Impacts under CEQA:

- 1) **Placing large quantities of cobble in the surf zone or on the recreational beach.**
- 2) **Excavation within the intertidal zone below MLLW.**
- 3) **Excavation of the existing beach and remnant dunes.**
- 4) **Stormwater discharge using the storm drain near the rivermouth.**
- 5) **Reconstructing existing infrastructure as proposed in Alternative 4.**

We offer the following mitigation measures to avoid these impacts:

Suggested Mitigation Measure 1: Significant Impacts to coastal resources can be avoided by placing sediments in the backshore area currently occupied by the parking lot, rather than along the active shoreline.

Suggested Mitigation Measure 2: Design of the cobble berm and dunes should be modified to minimize excavation of the existing beach and dunes and optimize opportunities to place sediment material in the backshore area.

Suggested Mitigation Measure 3: Fairgrounds runoff should be treated and directed to the Figueroa storm drain

We also offer the following recommendations for the Final EIR:

Recommendation 1: The Noble (2000) report should be included as an appendix to the EIR.

Recommendation 2: The final design should attempt to maximize the retreat zone in order to increase the life expectancy of the managed retreat project.

Recommendation 3: The information in the EIR relating to the “Cobble Nourishment Demonstration Project” should be updated, and a quantification of longshore transport from the demonstration site should be performed.

Recommendation 4: A lifespan and associated cost analysis should be performed to compare the various alternatives.

Recommendation 5: The “No Retreat” Alternative 4 should be removed from the “Surfers Point Managed Retreat Project” EIR.

II. General Comments:

The Surfers Point Managed Retreat project presents an unprecedented opportunity to restore and enhance a semi-urbanized shoreline to provide a long-term solution to coastal erosion problems. We believe that this project will provide a state- and worldwide example for other coastal communities experiencing similar issues.

The **Surfrider Foundation** strongly supports the concept of “managed retreat” as it applies to relocating damaged infrastructure inland. We also support the conceptual “Preferred Alternative” identified in the Draft EIR. However, we do have significant concerns relating to specific design details as well as the disclosure of environmental impacts associated with the various alternatives presented in the EIR.

This project potentially invokes a paradigm shift in coastal management. Therein lies a fundamental flaw with the existing Draft EIR and coastal studies: these documents are written without a sensitivity to the natural processes at work in one of the most dynamic geographic features on the planet – an oceanic river delta. Throughout the EIR, the fundamental benefits of relocating the damaged infrastructure are overlooked and under-emphasized, while other “shore protection” measures are emphasized. It is not true that Shoreline Drive is in imminent danger from shoreline erosion.

The managed retreat project provides the following fundamental restoration opportunities:

- 1) Maximize a retreat zone to provide a long term solution
- 2) Remediate the artificial fill that was placed beneath parking lot
- 3) Restore the remnant dunes to provide an additional buffer to storm waves
- 4) Work with cobble and sand to enhance and restore the natural processes

It is our position that a successful managed retreat project must:

- 1) Remediate existing problems
- 2) Do no further harm
- 3) Qualify for applicable permits
- 4) Qualify for public funding
- 5) Satisfy public needs and concerns

It is unfortunate that the design and environmental documentation read like an attempt to engineer and justify a shore protection structure, rather than to evaluate an unprecedented restoration opportunity. The engineering design lacks sufficient analysis to justify or compare the proposed measures, and often contradicts the conclusions and recommendations of the consultants and working group members. The Project Alternatives are not developed in a logical or scientific manner, but rather presented as a “menu” of options from which to select. Because of this, although a preferred alternative is identified, this recommendation is not based upon any environmental considerations.

Most importantly, the EIR lacks sufficient analysis of significant environmental impacts, and fails to provide mitigation measures for these impacts. These impacts and mitigation measures are outlined above, and a detailed discussion is provided below under specific comments for each section of the EIR.

We concur with the Working Group consensus that Alternative 5 provides the best opportunity to realize a long-term solution to erosion problems at Surfers Point. This alternative will provide the greatest life span and maximize the restoration opportunities. The Preferred Alternative will also have the least environmental impact of any of the project alternatives, as long as the proposed mitigation measures are applied.

III. Specific Comments:

The following detailed comments are arranged by section as they appear in the EIR:

2.3 CHARACTERISTICS OF PROJECT ALTERNATIVES

The Project Alternatives are not developed in a logical or scientific manner, but rather presented as a “menu” of options from which to select.

A logical development of the project alternatives would point out environmental impacts associated with Alternative 1, and explain the reasoning behind Alternative 2, and so on, until an environmentally preferred alternative is developed. For instance, Alternative 1 enacts a retreat zone, but does not provide any beach restoration measures, and includes a seawall that would not likely meet permit approval. Alternative 2 provides some beach restoration measures, but further evaluation identified significant impacts with the cobble mattress design. Alternative 3 refined the cobble mattress, but has significant impacts to the dunes and sandy beach. Alternative 5 further refines the cobble berm design, while also providing complete remediation of the artificial fill and enacting a comprehensive dune restoration program, hence is environmentally preferred.

The proposed alignment of the bike path in Alternatives 1-5 does not fulfill project objectives to realize a retreat zone seaward of Shoreline Drive.

- *To restore the lands seaward of Shoreline Drive to more natural beach habitat*
- *To provide a long term shoreline protection solution for Seaside Park and all improvements landward of Shoreline Drive*

The original intent of this project was to retreat to Shoreline Drive and provide the maximum retreat zone:

Relocation of Improvements: In conjunction with the shoreline protection, all of the existing infrastructure improvements seaward of the Shoreline Drive right-of-way, including the damaged bike path and a 352-space parking lot, would be removed.

In the course of Working Group discussions, compromises were made without the implications being made clear to the group. Specifically, the lifespan of this project will be determined to a great extent by the width of the retreat zone.

For example, Noble (2000) suggests that the average annual recession rate of the shoreline in this area is approximately 1 foot per year. This would suggest that an 80-foot retreat zone would “buy” perhaps 80 years. Placing the bike path seaward of Shoreline Drive reduces the retreat zone by 15 feet, “costing” 15 years of project life. A higher erosion rate would mean a greater impact to this reduction in retreat zone width.

Recommendation 1: The Noble (2000) report should be included as an appendix to the EIR.

Recommendation 2: The final design should attempt to maximize the retreat zone in order to increase the life expectancy of the managed retreat project.

Recommendation 4: A lifespan and associated cost analysis should be performed to compare the various alternatives.

4.0 ENVIRONMENTAL IMPACT ANALYSIS:

The report, "Surfers Point Park, Managed Plan for Shoreline Retreat," Noble (2000) is not included in the list of technical studies referenced by the EIR. Throughout the EIR, information from this report is used, but the original document with its conclusions is not made available to the reader.

Recommendation 1: The Noble (2000) report should be included as an appendix to the EIR.

4.1 LAND USE

Engineered cobble berms are "shoreline protection devices".

"...the buried seawall that would be constructed under Alternatives 1 and 2 is a shoreline protection device..."

The cobble mattress in Alternative 2 as well as the engineered cobble berm of Alternatives 3-5 may also be considered "shore protection" devices. Although these dynamic structures are designed to provide a more natural response to wave action, the nature of their design and placement may have impacts similar to a more traditional coastal structure. For instance, wave reflection as occurs from rip-rap revetments placed within the wave runup zone would also occur with a similarly located "cobble berm". See comments on COASTAL GEOLOGY.

600-700 additional parking spaces would impact "fragile resources."

Alternatives 1-3 and 5 would all include paving of the existing 600-700 space dirt lot at the Fairgrounds

Paving the existing 600-700 space parking lot at the Fairgrounds would greatly increase public impacts to the beach and dunes. This is *not* "consistent with fragile resource protection" as required by the General Plan.

Conversely, "Adequate ground level parking" as required by the General Plan will only be provided if the proposed plans for parking along Shoreline Drive are carried out. Parking should be provided either on-street or in the dirt lot area under any final plan for the area.

4.3.1 Impact Analysis

a. Marine Resources:

There are Significant Impacts from placing large quantities of cobble in the surf zone:

“...placement of an estimated 25,400 tonnes (28,000 tons) of cobble and 8,410 cubic meters (11,000 cubic yards) of sand within the upper intertidal area of the project...”

Although it is true that turbidity is high due to fine suspended sediments from the Ventura River following winter storms, deposition of cobble into the surf zone during dry periods or summer months would cause significant impacts to ocean water quality. In addition, the inclusion of fine sediments in the cobble nourishment “demonstration project” demonstrated that this action may have long term effects as this fine material is slowly exposed and washed into the surf zone.

Excavation within the intertidal zone below MLLW in Alts 3 & 5 is a Significant Impact:

“Alternative 3. ...development of a more substantial berm (approximately 48,990 tonnes [54,000 tons] of cobble) with a toe below the elevation of MLLW would increase the amount of disturbance within the marine environment.”

The disturbance caused by heavy equipment excavating in the surf zone below MLLW is a significant environmental impact. This action is neither necessary nor justified for the construction of a “dynamic revetment” – the artificial cobble berm would naturally merge with the cobble substrate under wave action without such a heavy disturbance.

Suggested Mitigation Measure 1: Significant Impacts can be avoided by placement of sediment material in the backshore area, rather than along the active shoreline.

- Cobble should be placed within the excavated area beneath the existing parking lot, rather than on the shoreline.
- The placement of Sand Dunes in the backshore area will not affect water quality but rather enhance Marine Resources by increasing terrestrial habitat adjacent to the shoreline for beneficial flora and fauna.

b. Essential Fish Habitat

Steelhead Trout: This federally listed endangered species has historically been caught along the shoreline at Surfers Point from the pier to Emma Wood State Beach. The adjacent estuary is critical habitat for this species as it migrates to and from the ocean. The actions of Alternatives 2-5 would affect water quality and potentially affect steelhead trout.

c. Sensitive Species and Critical Habitat:

As mentioned above, adjacent waters are critical habitat of the steelhead trout and other sensitive species. However, the EIR states that *“none of the project alternatives are expected to alter the hydrologic nature of this upstream and up-littoral current area.”*

The currents in the area adjacent to the rivermouth are especially dynamic. For instance, during summer, south swells reverse the littoral current. Disturbance to adjacent waters could have an adverse impact due to ever changing wave, wind, and tidal conditions.

Suggested Mitigation Measure 1: Significant Impacts can be avoided by placement of sediment material in the backshore area, rather than along the active shoreline.

d. Impacts to Dune Remnant:

“The area was initially fenced with temporary construction fencing, followed by the installation of a split rail fence... but the increase in visitor beach access... essentially eliminated the coastal dune community in the area.”

It is important to note that **the area was NOT initially fenced**. In fact, lack of fencing when the parking lot was initially constructed was one cause of the impacts from increased visitor access from 1989-1991. Because of the impacts to the dunes, the Coastal Conservancy funded a planning process and grant to construct of the dune fences. This was the first step in the “Dunes Restoration Project” (October 1991). Although subsequent restoration steps, including a revegetation program, were never carried out, the dune fences have been successful in allowing natural (although non-native) revegetation in the sandy areas. The designated walkways have proved successful in directing and concentrating foot traffic.

Although the native vegetation and habitat has been severely degraded, it is important to note that these dunes provide more than habitat values. They also provide natural shore protection and aesthetic benefits. Therefore:

Impacts associated with the excavation of the Remnant Dunes with Alternatives 2-5 would have significant impacts to COASTAL GEOLOGY and AESTHETICS. See comments in those sections below.

e. Landscape Trees and Shrubs:

“Reconstruction of Shoreline Drive and removal of the parking lot would remove an estimated 76 New Zealand Christmas Trees...”

Recent information suggests that the assumptions upon which this design was made may no longer be valid. Specifically, this was the Fairgrounds desire to maintain 3 lanes of traffic plus parking. Although these trees are non-native, they are well established and attempts should be made to adapt the final design to accommodate them.

f. Wetlands

“Alternatives 2-5 would involve temporary discharge of material into intertidal areas that are regulated as marine wetlands.”

The impacts relating to discharge of material into the intertidal areas **are not the same** for each of the alternatives. For instance, frequent re-nourishment of a cobble berm as required for Alternatives 2 & 4 would result in greater impacts to wetlands. This is discussed further under **Sedimentation**. Impacts may be mitigated through design modifications:

Suggested Mitigation Measure 1: Significant Impacts can be avoided by placement of sediment material in the backshore area, rather than along the active shoreline.

4.6 Water Resources

a. Hydrology

“rerouting runoff directly into the ocean would improve water quality in the estuary”

But this could significantly impact the recreational waters at Surfers Point.

b. Water Quality

Shoreline Management Impacts:

p4-16 *“As discussed in Section 4.3, Biological Resources, the temporary increase in ocean water **turbidity is expected to adversely affect** any sensitive marine biological resources.”*

We concur with the statement as written. See comments on Biological Resources above relating to long term impacts and recurrent impacts from the differing renourishment requirements of the alternatives.

Fairgrounds Parking Lot impacts:

“...would involve abandonment of the Ventura River outfall and re-routing of all discharges directly to the ocean.”

The storm drain improvement plan (Fig 4-1) suggests using the existing storm drain outfall into ocean near rivermouth. **Discharge of stormwater directly into the surfing area would impact water quality in recreational waters.**

The manhole and pipe infrastructure within the “retreat zone” and intertidal is slated for removal with the retreat projects. If this plan is proposed, the cost of re-establishment and maintenance should be included in cost estimates.

Pumping runoff through existing storm drain near rivermouth does not fulfill project objectives that would include abandoning all infrastructure seaward of Shoreline Drive.

Suggested Mitigation Measure 3: Fairgrounds runoff should be treated and directed to the Figueroa storm drain

It should be noted that this project presents an opportunity to address the chronic water quality problems at Surfers Point. An area-wide storm runoff plan should be implemented wherein runoff is directed to the Figueroa storm drain, where all urban runoff could be treated and filtered before discharge into the ocean water. An opportunity to enhance the quality of recreational waters at Surfers Point could be realized by 1) Redirecting dry weather flows to sanitary sewer and/or 2) redirecting stormwater further downcoast where body contact recreation is less.

Current actions by the Regional Water Quality Control Board include both dry and wet weather TMDLs for bacteria in Santa Monica Bay. Attention to this issue during the reconstruction of Surfers Point and in conjunction with the Promenade reconstruction will address this issue now, rather than awaiting future mandates.

4.7 COASTAL GEOLOGY

a. General Performance.

b. Shoreline Protection

These two sections describe how the Project Alternatives may help protect the bike path, parking lot, and Shoreline Drive. This is not an environmental impact, but an engineering design consideration. Most importantly, it should be made clear that the protection of upland improvements does not “protect” the shoreline. Any form of shoreline armoring designed to protect upland infrastructure has an impact on the beach. Is the potential loss of a bike path or parking lot a "coastal geology" impact? This is perhaps more appropriately a recreational impact.

Furthermore, the discussion of each of the Alternatives fails to mention the true merits of this project. **Retreat from the shoreline is the primary objective of the project.** Retreat also provides the greatest single benefit, and provides “Shoreline Protection” by relocating infrastructure out of harms way, reducing or eliminating the need for shoreline armoring. Verbage such as “*and, to a lesser extent, the increased setback from the existing shoreline*”, and “*(4) the increased setback from the existing shoreline*” fail to acknowledge that this action alone would provide decades of maintenance free “shoreline protection.”

Most importantly, this paradigm is carried over into the apparent justification for the “no retreat” alternative:

Alternative 4

Considering the intent of this project to effect a “managed retreat” and restore the beach, the content of this section seems quite inappropriate. First of all, Alternative 4 does not meet project objectives. Secondly, this section appears to have been written to provide false justification for the “no retreat” alternative. Information was taken out of context from a separate report, “**Surfers Point Park, Managed Plan for Shoreline Retreat**” (Noble 2000) conducted for the Managed Retreat Project. This report with its Appendix A should be included an appendix to the EIR.

The EIR states:

“Based on the long-term stability of the cobble berm at Emma Wood State Beach...”

The Emma Wood shoreline is receding at a rate greater than suggested by the study – this may be directly evidenced by the WWII gun turrets that were constructed in the dunes in 1940’s are now over 100 feet in the intertidal zone.

“...and the promising performance of the cobble berm test section at Surfers Point”

This statement was based upon one short mild winter storm season. Recent storms (winter 2002-2003) have transported a major portion of this berm alongshore, as witnessed by the reduced berm profile and the increased quantity of cobble along the city and state beach. The city is currently applying for permits to renourish this artificial berm. The EIR should present the most recent profiles (ideally at the end of this storm season) and provide a realistic estimate of future renourishment requirements for this approach.

Recommendation 3: The information in the EIR relating to the “Cobble Nourishment Demonstration Project” should be updated, and a quantification of longshore transport from the demonstration site should be performed.

“... the maximum and minimum shoreline positions in the project area differed by as much as 868 ft...”

This statement is based upon the maximum historic accretion at the rivermouth that resulted from the 1969 “El Nino” floods:

“The shoreline change that occurred in 1969 stands out in the data set. This data corresponds to the second highest discharge of record when a peak flow of 58,000 feet per second was gauged. Sediment delivery from the river contributed to the shoreline advanced almost 600 feet that was noted at the west end of Surfers Point near the river mouth (Station 9,000). (Noble, 2000) (pA-2):

These data **do not imply** the potential for erosion of the existing beach. In fact:

“...the shoreline at Surfers Point fluctuates widely with the episodic flood transport of sand from the Ventura River. Flood years bring more sand than the waves can transport, forming an accretionary buldge that is moving easterly across the delta and along Surfers Point in the form of a travelling accretion wave (Inman, 1987).” Appendix C p11

And:

“Using the rates summarized in Figure A-2 for the past 70 years it may be concluded that the backbeach line at the river mouth will retreat 75 feet in the next 50 years and 150 ft in the next 100 years; the backbeach line between there and the present position of Surfers Point will retreat half those amounts; and the backbeach line at Surfers Point will advance 45 ft and 90 feet respectively in the next 50 and 100 years. Using this approach east of the point, the backbeach line will retreat perhaps 10-15 ft in 50 years and 20 – 30 feet in 100 years.” (Noble, 2000. (p A-5))

Given this information, the following statement is also false:

“retreat associated with Alts 1-3 and 5 would provide only a marginal improvement in shoreline protection as compared to the repair of the bike path..”

The EIR quotes the Ventura Comprehensive Plan:

No structures, other than those incidental to general public recreational purposes, and public access to the site and along the shore and the Fairgrounds, may be permitted in the oceanfront corridor. Such a corridor shall be at least 250 feet in depth, as measured from the top of the natural embankment, as officially established through a land survey. Public uses and development, including a public roadway, walkways, bikeways, parking, camping, and the like, which do not involve permanent buildings, may be permitted in the oceanfront corridor. The public roadway has been sited to be set back sufficiently to mitigate the need for any shoreline protection device, as determined by a geotechnical study of shoreline and erosion processes, for a minimum 50-year period, as measured from the top of the natural embankment. (EIR p4-2)

This policy was based upon a prior study (Moffatt & Nichols) and infers that the rate of erosion at Surfers Point is such that Shoreline Drive, while placed within the 250 foot “oceanfront corridor,” has a minimum lifespan of 50 years without a seawall.

As quoted above, the **Noble (2000)** study estimates that shoreline erosion for the next 50 years would be a maximum of 75 feet at the rivermouth and only 10-15 feet further east of the point.

This information indicates that **there IS a significant benefit to the alternatives that include a retreat**. The proposed 65 ft retreat zone with Alts 1-3 and 5 would provide at least a 40-year lifespan in the areas of highest erosion **even without the proposed beach nourishment and restoration measures**. Indeed, the restoration of the dune complex and fortification of the backshore as proposed in the Preferred Alternative would provide significant extension of this lifespan.

During the scoping phase of the project the **Surfrider Foundation recommended that a lifespan analysis of the various alternatives be performed**. (See comment on section 6.1) The current cost analysis does not include future renourishment and other protection measures, only one-time construction costs. The EIR makes no attempt to quantify the relative impact to project lifespan from the various retreat, renourishment, and shore protection measures. It is critical that this information be provided in order that the decision makers and the public may understand the true costs and benefits of the proposed projects, and how long each may last in order to make an informed decision.

Recommendation 4: A lifespan and associated cost analysis should be performed to compare the various alternatives.

Because of the gross errors and misrepresentation of the facts relating to the discussion of Alternative 4, and the fact that it does not fulfill the project objectives or represent the consensus of the working group, we offer the following recommendation:

Recommendation 5: The “No Retreat” Alternative 4 should be removed from the “Surfers Point Managed Retreat Project” EIR.

Unless all references to this Alternative can be re-assessed to provide an honest disclosure of its environmental impacts, it should be removed from the document. The assertion that there is **no environmental impact** to rebuilding the bike path and dumping rocks as needed to protect it is false. To expect that the future will differ from the past is ridiculous. The bike path and parking lot were constructed too close to the beach on fine-grained artificial fill material. It didn’t last in 1989, and it won’t last in the future – with or without the rocks.

c. Sedimentation:

The sedimentation analysis fails to acknowledge that each of the alternatives would have different impacts. The discussion lumps together Alternatives 2 and 5, and Alternatives 3 and 4, but uses the following rationale for each Alternative:

- *The rate of cobble transport is low (much lower than that of sand);*
- *Cobble suitable for installation in a mattress would be less susceptible to wave induced erosion than the mixture of cobble and sand that is currently discharged from the Ventura River mouth; and*

- *The placement of cobbles on the beach face would be analogous to the episodic delivery of cobbles from the Ventura River during flood years, which has not exerted a significant negative impact to San Buenaventura State Beach conditions.*

This is a direct contradiction of the previous “Shoreline Protection” section, which states:

It should be recognized that the cobble mattress and sacrificial sand dune as envisioned would be susceptible to undermining and dispersal due to the absence of a substantial toe below the elevation of MLLW. Consequently, relatively frequent maintenance would likely be required as compared to the cobble berm of Alternatives 3, 4, and 5 to replenish the mattress during those periods when shoreline retreat predominates in the project area.

Also, in Appendix C, it is stated that with the cobble mattress of Alternative 2 “*the prominent salient between East and West beaches will cause longshore sediment transport to be deflected offshore.*” This suggests that the cobble mattress in Alternative 2 would have significant impacts to the natural sedimentation processes. Also, the configuration of Alternative 4 is most similar to Alternative 2, and would likely have similar impacts.

In comparison, much of the cobble berm in Alternatives 3 & 5 is either buried, or located further back from the active shoreline. This approach would reduce the sedimentation impacts as compared to the other alternatives. Most importantly, if no material is placed on the active beach, as we suggest, impacts to sedimentation will be minimized.

Furthermore, the bulleted points above are inaccurate descriptions of the impacts from an engineered cobble/boulder mattress/berm. Specifically:

- 1) Those alternatives that place “cobble” directly onto the beach, in the intertidal and swash zone, will be subject to wave action and thus experience erosion and downcoast transport. It is true that the rate of transport of cobble is less than that of sand, but observations of the “**Cobble Nourishment Demonstration Project**” over the past two years indicate that a significant proportion of **cobble migrated down into the cove and past the pier. This HAS exerted a significant negative impact to San Buenaventura State Beach, as well as the City of Ventura**, who both remove rocks from the beach during the summer months. The demonstration project has shown that cobble placed on the shoreline migrates downcoast within a couple of years.
- 2) **The cobble berm/mattress will have an affect on the presence or absence of beach sand.** Science has demonstrated that increased wave reflectivity increases the mean (time-averaged) undertow, and would result in increased offshore sediment transport. This is predicted by cross-shore sediment transport models (Bagnold, 1966; Bowen, 1980; Bailard, 1981). The EIR should study this impact for all 6 alternatives.
- 3) **The comparison between the natural delivery of sand and cobble from the river to any of the engineered cobble structures is simply not valid.** The natural processes, including fluvial and littoral fluid forces, sort and arrange the sediments according to the dynamic conditions at the rivermouth. Much of this “*mixture of cobble and sand that is currently discharged from the Ventura River mouth*” builds

the submerged portion of the river delta and/or forms a spit after large flood events. This spit gradually migrates downcoast due to wave induced littoral drift, and seasonal wave action generates cross-shore (on- and off-shore) sediment migration. **At no time would natural processes deliver cobble and boulders to the shoreline hundreds of feet downcoast from the rivermouth in a manner analogous to a dump truck.**

- 4) The “**Cobble Nourishment Demonstration Project**” included a relatively large percentage of boulders (greater than 8”). As cobble is transported along shore the boulders are left to slump onto the beach. **These boulders left in the shallow water create an unnatural hazard to those who surf or swim.**
- 5) **The cumulative impacts from future re-nourishment are underestimated.** It is clear from the discussion above, that further “re-nourishment” of cobble and boulders is equivalent to selectively armoring the shoreline and will eventually lead to the creation of a boulder revetment. Those alternatives (2, 4) that would require the most renourishment would have the greatest impact.

Recommendation 2: The information in the EIR relating to the “Cobble Nourishment Demonstration Project” should be updated, and a quantification of longshore transport from the demonstration site should be performed.

Suggested Mitigation Measure 1: Significant Impacts can be avoided by placement of sediment material in the backshore area, rather than along the active shoreline.

This section also is dismissive of impacts from the buried seawall in Alternatives (1) or (2), which contradicts the previous section asserting that the seawall will be protective of land behind it. The buried seawall cannot both protect structures landward of it and have no geological impact seaward, be it due to active, passive, or placement erosion.

Wave/Surf Impacts:

Alternative 2. As long as the seawall remains buried, Alternative 2 would not exert a negative impact on the quality of the surf available for wave-related recreation. The cobble mattress may, in fact, reduce wave reflection to some degree, with a corresponding improvement in wave conditions due to increased energy dissipation.

This contradicts statements elsewhere:

... the mattress would be prone to undermining and dispersal due to the absence of a substantial toe that extends below the MLLW, and the presence of the sand dune at the top of the cobble slope (which would exacerbate wave backwash).

Appendix C also suggests that the cobble mattress in Alternative 2 would be subject to erosion. Backwash creates reflected waves, which can disrupt surf conditions. The cobble mattress of Alternative 2 is very likely to create, rather than dissipate, reflected waves under conditions other than high tide. **This is a significant impact to surfing and recreation.**

Alternatives 3, 4, and 5. *As with Alternative 2, the dissipative surface of the cobble berm that would be implemented under Alternative 3 could improve the quality of the surf by*

reducing wave reflection. This improvement, which is expected to be modest, is less likely to occur when water levels are low and relatively small waves affect the sand-charged toe of the berm.

Again, these alternatives are considered to have a similar effect, and the cobble berm is described as dissipative. This is true if compared to the buried seawall. a cobble berm placed in the swash zone will result in increased wave reflection, and not dissipation as this suggests. In fact, no artificial means will “*improve the quality of the surf by reducing wave reflection.*”

Suggested Mitigation Measure 1: Significant Impacts can be avoided by placement of sediment material in the backshore area, rather than along the active shoreline.

The configuration of the Preferred Alternative 5 with the suggested mitigation measure will avoid placing material in the surf-affected swash zone, thus eliminating any impact to the surfing conditions.

Other Impacts not addressed in the EIR: Impacts to Remnant Dunes

Excavation of Remnant dunes will have a significant impact:

The EIR does not acknowledge impacts to the dunes from construction traffic and the excavation and replacement of sand under alternatives 2-5.

The shore protection benefits of sand dunes have been well documented. At Surfers Point, the natural “point” near the rivermouth includes the remnants of a sandy dune backshore. This has helped maintain a relatively stable shoreline in the past, preventing overtopping and shoreline retreat as compared with the adjacent shoreline that does not benefit from this dune feature.

The design specifications of the buried cobble berm call for a 5:1 slope underneath the dune area. It is likely that excavating the existing beach and dunes in order to create an artificial “foundation” of cobble may result in increased erosion by de-stabilizing an embedded coastal terrace. It is also likely that a cobble “foundation” already exists beneath the dunes and beach.

Excavating hundreds of cubic yards of natural dune and healthy beach in order to place the cobble berm/mattress structure would have significant and unmitigable environmental impacts.

Suggested Mitigation Measure 2: Design of the cobble berm and dune restoration should be modified to minimize excavation of the existing beach and dunes and optimize opportunities to place sediment material in the backshore area.

Alternatives 3 and 5: In the existing dune area, a subsurface cobble berm with a pre-determined slope is unnecessary. The “one size fits all” approach for the entire project area does not acknowledge the natural processes and “shore protection” function of the existing cobble berm and sand dune complex. In fact, the intent of Alternative 5 was to minimize the impacts to the existing shoreline by placing cobble in the void left when artificial fill is removed from beneath the parking lot. If a 5:1 slope is deemed important, the shoreward portion of the 5:1 slope may be truncated in the area beneath the dunes, or the entire berm moved further back.

4.11 AESTHETICS

The dynamic, ever-changing nature of the rivermouth provides an aesthetic resource that is unique and irreplaceable. The rivermouth, estuary, beach, and dunes are the City of Ventura's most valuable natural asset, providing high quality recreation and relaxation through its proximity to the forces of nature. This section does not acknowledge that the current condition of the active beach is aesthetically appealing, but the crumbling bike path and parking lot detract from this appeal.

There is no mention of how the placement of a cobble berm along the shoreline will drastically change the visual and aesthetic appeal of the area. The elimination or excavation of the dunes or beach is also of great concern. These are significant impacts to varying degrees with alternatives 2-5, but may be mitigated with **Suggested Mitigation Measure 1 & 2** and **Alternative 5**.

Also, the EIR states:

"...possible loss of ocean views from the bike path associated with Alternatives 2 and 5 could be minimized by using a maximum dune elevation comparable to the elevation of the bike path."

This statement completely misses the point. Views from the bike path will actually be enhanced by the return to a more natural environment.

6.1 NOTICE OF PREPARATION

During the Scoping Phase, the Surfrider Foundation had requested the following:

Additional design details need to be included in the project description, including design lifespan, removal of existing fill, sources of sand and cobble, and the need for a buried seawall - Addressed in Section 2.0, Description of Project Alternatives

There is no design lifespan analysis in Section 2.0.

Recommendation 4: A lifespan and associated cost analysis should be performed to compare the various alternatives.

Other Issues

CUMULATIVE IMPACTS

Promenade Reconstruction – As stated above in comments relating to Water Quality, the reconstruction of the promenade represents an opportunity to develop an area-wide stormwater mitigation program.

Fairgrounds Master Plan – The Fairgrounds in 2003 began an update of their Master Plan. Until this is complete, cumulative impacts are difficult to assess. However, the managed retreat project should be considered in the context of future planned expansion of the Fairgrounds. In particular, parking and public access should be maintained.

Matilija Dam – The proposed removal of Matilija Dam will provide restoration of fluvial processes and sediment supply from the Ventura River. The Ventura River historically provided almost twice the sediment flux before dam construction. Increased sediment supply will provide long-term stabilization to the shoreline at Surfers Point. Although the Managed Retreat Project is separate, it should be considered in the context of this regional effort to restore the littoral sediment budget. For instance, with the removal of Matilija Dam it is likely that an era of shoreline accretion will return within a 50-year project lifespan.

PROJECT COST & PUBLIC ACCEPTANCE

Funding through several State Propositions is available for well-planned restoration projects, especially those that enhance Parks, Water Quality, and Coastline areas. In order to secure grant funding, public acceptance and approval of the project will be required. This will require developing a project that has a favorable cost/benefit ration (i.e. the least cost and the highest benefits). Note that the benefits should be measured by the ecological restoration aspects of the project, and not by how many parking places are gained.

We encourage the City of Ventura to work to maximize the restoration potential for this project and apply for grant funding to offset the construction costs required to create the best project possible.



Surfrider Foundation

Ventura County Chapter

239 W Main St., Ventura, CA 93001 (805) 667-2222

Paul Calderwood, Senior Planner
City of Ventura, Planning Division
501 Poli Street, Room 117
Ventura, CA 93110

February 4, 2003

RE: “Surfers Point Managed Shoreline Retreat” Draft Environmental Impact Report

Dear Mr Calderwood:

Enclosed are a few additional comments on the “Surfers Point Managed Shoreline Retreat” Draft Environmental Impact Report. We have included these additional comments in an effort to provide the public and decisionmakers with a clear picture of the long-term implications of the project, as well as to improve the defensibility of the EIR once a decision has been made to move forward with a project. We believe that addressing these issues now will simplify the permitting process with the California Coastal Commission and the Army Corps of Engineers, which will likely use the EIR as supporting information in the issuance of Corps permits.

We hope that these additional comments are helpful, and we request that our input be solicited and considered during the Final Design process. Please contact me with any questions.

Sincerely,

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

Supplemental comments on Surfers Point Managed Shoreline Retreat Draft Environmental Impact Report

PROJECT DESCRIPTION AND ALTERNATIVES ANALYSIS

The California Environmental Quality Act (CEQA), Section 15126(d) Alternatives to the Proposed Action, supports the use of an alternative screening analysis. This section states:

"Describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives."

The CEQA guideline also state:

"The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effect of the project. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the project."

The EIR does a good job in describing a range of alternatives. However, the EIR never really identifies a "project", but only a series of alternatives. Given the fact that no project is identified, it is difficult to determine which alternatives avoid or substantially lessen potentially significant impacts associated with the "project".

CEQA also requires that the EIR identify the environmentally superior alternative. Also, CEQA Guidelines, Section 15126 (d)(4) states that if the environmentally superior alternative is the No Project Alternative, then the next most environmentally superior alternative must also be identified. The Draft EIR makes no attempt to identify the environmentally superior alternative, nor does it provide a meaningful discussion of the relative merits of the proposed project and alternatives.

Recommendation: The EIR should clearly identify the proposed project and evaluate those alternatives that would avoid or lessen potential environmental impacts. The EIR should identify the environmentally superior alternative.

PROJECT/ALTERNATIVE DESCRIPTION COMPLETENESS

The EIR does not provide a complete description of the proposed project/alternatives in terms of the long-term characteristics of the project. Clearly, long-term maintenance will be required for several of the alternatives, which would also result in future impacts. Given the known need to re-nourish the cobble berms for several alternatives, the project description should disclose the true parameters of the project, such as volume of material that will be required for re-nourishment over the next 30 years, the associated number of truck trips, beach closures, air quality impacts, impacts to coastal dunes, etc.

Without complete information on the long-term characteristics of an alternative, it is impossible to provide a reasonable comparison of the proposed project and alternatives. The EIR currently leaves the reader with the impression that a less-expensive alternative may be attractive due to relatively low costs and impacts. However, the EIR has failed to disclose the long-term impacts with the lower cost alternative (i.e., Alternative 4).

Recommendation: The EIR should be revised to disclose the true long-term costs and impacts associated with each alternative. This would include revising the Project/Alternative Descriptions and impact analyses. Finally, the comparison of alternatives should reflect the true long-term costs and impacts associated with each alternative.

CUMULATIVE IMPACTS

The California Environmental Quality Act (CEQA), in Section 15355 of the guidelines, defines "cumulative impacts" as two or more individual effects that, when considered together, are either considerable or compound other environmental impacts. CEQA Section 15130(b)(1)(B)2 also requires an agency to consider how a project's impacts will cumulate with the impacts of past, present and probable future projects.

A typical "project specific" cumulative analysis looks at the changes in the environment that result from the incremental impact of development of a proposed project and other reasonably foreseeable projects that have not been included in the environmental setting. For example, the traffic impacts of two projects in close proximity may prove to be insignificant when analyzed separately, but could be significant when the impacts of the projects are analyzed together. While these projects may be unrelated, their combined (i.e., cumulative) impacts are significant.

CEQA Guideline Sections 15064(1)(4) and 15130(a)(4) provide that an agency could determine that the incremental of a project were not cumulatively considerable when they would make only a "de minimis" contribution to a significant effect. Guideline 15064(i)(4) states that such de minimis incremental impacts, by themselves, would not trigger the obligation to evaluate cumulative impacts in an EIR. In a recent case, *Communities for a Better Environment v. California Resources Agency* (Case #C038844 10/28/02), the court found that an agency following these guidelines could fail to take into account the nature and scope of a significant cumulative impact, and instead might focus solely on the incremental impact of the project. The court suggested that the greater the cumulative environmental problem, the lower the threshold should be for determining the significance of a project's contribution to that cumulative impact.

Clearly, the EIR fails to provide any analysis of potential cumulative impacts with nearby or relevant projects. At a minimum, the EIR should be revised to include an impact analysis for the following projects:

- Rehabilitation of the Ventura Beach Promenade,
- Proposed 250-275 room hotel and restaurant at the southeast corner of Harbor Boulevard and Figueroa Street,
- Matilija Dam Removal.

These projects are well along in the planning stages and are reasonably foreseeable. In addition, they each have the potential to result in significant cumulative impacts, or possible beneficial impacts that would affect the evaluation of the proposed project.

In addition to these projects, numerous projects at the Fairgrounds are in the conceptual stage and will be evaluated as part of the Fairgrounds Master Plan. While the Master Plan has not been completed, components of the Master Plan that have been publicly discussed by the Fair Board should be included in the cumulative impact analysis section as well.

Recommendation: The EIR should reevaluate the projects that are considered in the cumulative impacts section of the EIR. At a minimum, the EIR should evaluate those projects bulleted above for each relevant issue area.