

CALIFORNIA COASTAL COMMISSION

SOUTH CENTRAL COAST AREA
39 SOUTH CALIFORNIA ST., SUITE 200
VENTURA, CA 93001
(805) 641-0142

RECORD PACKET COPY



Filed: 4/7/2000
49th Day: 5/26/2000
180th Day: 10/4/2000
Staff: MHC
Staff Report: 4/20//2000
Hearing Date: 5/9-12/2000

Staff Report: Appeal
Substantial Issue

Local Government: Santa Barbara County

Local Decision: Approve With Conditions

Appeal No.: A-4-STB-00-082

Applicant: County of Santa Barbara Parks Department

Project Location: Goleta County Beach, Santa Barbara County

Project Description: Installation of rock revetment seawall

Appellants: Commissioners Pedro Nava and Sara Wan

Substantive File Documents: Appeal A-4-STB-00-082; Santa Barbara County Local Coastal Program Emergency Permit No. 00-EMP-002.

Summary of Staff Recommendation: Substantial Issue Exists

The Staff recommends that the Commission, after public hearing, determine that substantial issue exists with respect to the grounds on which the appeal has been filed for the following reason: the construction of the proposed rock revetment seawall is inconsistent with the applicable shoreline protective structures, public access, alteration of landforms, scenic and visual resources, and environmentally sensitive habitat protection policies and related zoning standards of the County's certified Local Coastal Program, as well as with the public access policies of the California Coastal Act.

The Appellants allege the project is inconsistent with the Santa Barbara County Local Coastal Program as a result of: (1) inconsistency with LCP Policy 3-1 regarding permitted shoreline protective structures; (2) inconsistency with LCP Policy 3-2 regarding adverse impacts on public lateral access, and LCP Policies 7-1 through 7-27 regarding provision of public access to and along the County beaches; (3) inconsistency with LCP Policies 7-6 regarding extensive alteration of the natural environment and LCP Policy 3-14 regarding fitting development to site topography, and LCP Policy 4-4 regarding conforming development with the scale and character of the existing community; (4) inconsistency with the LCP Policies 9-1 and 7-4 regarding the protection of environmentally sensitive habitats. (See Exhibit 2.)

The Commission finds that a substantial issue exists with respect to the ground on which the appeal has been filed because the project as conditionally approved by the County would be inconsistent with County LCP policies and Coastal Act policies regarding the protection and provision of public access, and further, is inconsistent with County LCP policies regarding public views along the beach, the protection of natural landforms, including bluff faces, and the related findings under the County's Conditional Use Permit process.

I. Project Description

The project proposed by the applicant (Santa Barbara County Parks Department) consists of the installation of 945 feet of rock revetment seawall fronting the Goleta Beach County Park. The rock revetment is comprised of approximately 3,000 tons of rock placed on the upper portion of the beach along the base of an escarpment. The rock is a serpentine material and range in size up to 3 feet in diameter. The rocks are placed on a 1:1 to 1.5:1 slope and extend to within 2 to 3 feet of the top of the escarpment, and are placed in a three foot deep trench excavated into the sand beach at the based of the escarpment. In addition to the rock revetment seawall, the project includes the temporary installation of four stairways comprised of wooden timbers supported on pre-cast concrete piers, and a temporary wire and metal post safety fence along the top edge of escarpment. (All elements of the project, except the four temporary stairways, were installed between February 24 and March 3, 2000; see Exhibit 4.)

The seawall is intended to reduce the rate of coastal bluff retreat caused by wave action at seaward edge of the Goleta Beach County Park. (See Exhibit 5.)

II. Appeal Procedures and Jurisdiction

The Coastal Act provides for appeals to the Coastal Commission after certification of Local Coastal Programs (LCPs) of a local government's actions on Coastal Development

Permits. Developments approved by cities or counties may be appealed if they are located within the mapped appealable areas, such as those located between the sea and the first public road paralleling the sea, within 300 feet of the inland extent of any beach or of the mean high-tide line of the sea where there is no beach, whichever is greater, on state tidelands, or along or within 100 feet of natural watercourses (Coastal Act Section 30603[a]). Any development approved by the County that is not designated as a principal permitted use within a zoning district may also be appealed to the Commission irrespective of its geographic location within the Coastal Zone (Coastal Act Section 30603[a][4]). Finally, developments that constitute major public works or major energy facilities may be appealed to the Commission (Coastal Act Section 30603[a][5]).

The proposed project consists of a shoreline protective structure located seaward of an artificially filled sand spit near the mouth of the Goleta Slough. (See Exhibits 1 and 5.) Portions of the shoreline protective fall within the Coastal Commission's area of retained original coastal permitting jurisdiction (Coastal Act Section 30519[b]).

However, portions of the project may be located landward of the mean high-tide line, but seaward of the first public road paralleling the sea (Sand Spit Road). These portions fall within the area of the Commission's appeal jurisdiction and are subject to appeal to the Commission (Coastal Act Section 30603[a][1]).

Practically, the proposed project is not segregable for the purposes of analyzing the project's impacts and consistency with the County's LCP and the access policies of the Coastal Act. The seawall is functionally interrelated and interdependent. Consequently, it is not feasible to analyze those portions of the project within the Commission's appeal jurisdiction separably from those portions that are within the Commission's retained original permit jurisdiction. The County of Santa Barbara reviewed the whole project as a unified whole. Because the project is an integral whole which cannot be segmented for the purposes of analyzing the project's consistency with applicable policies of the Santa Barbara County Local Coastal Program and the access policies of the California Coastal Act, the substantial issue analysis that follows considers the project in its entirety.

The grounds for appeal for development approved by the local government and subject to appeal to the Commission shall be limited to an allegation that the development does not conform to the standards set forth in the certified Local Coastal Program or the public access policies set forth in Division 20 of the Public Resources Code (Coastal Act Section 30603[a][4]).

Section 30625(b) of the Coastal Act requires the Commission to hear an appeal unless the Commission determines that no substantial issue is raised by the appeal. If the

Commission should find that a substantial issue is not raised by the portions of the project in the County's original Coastal Development Permit jurisdiction, the Commission would still have to determine whether a Coastal Development Permit should be issued for the majority of the project that is located within the Commission's original retained permit jurisdiction.

Procedurally where the staff is recommending that the appeal raises a substantial issue, unless three or more commissioners wish to hear arguments regarding the question of substantial issue, then substantial issue is deemed found. If the Commission decides to hear arguments and vote on the substantial issue question, proponents and opponents will have three (3) minutes per side to address whether the appeal raises a substantial issue.

A substantial issue will be found unless a majority of Commissioners present find that no substantial issue is raised by the appeal. If a substantial issue is found to exist, the Commission will proceed to a full public *de novo* hearing on the merits of the project which may occur at a subsequent hearing. If the Commission conducts a *de novo* hearing on the merits of the permit application, the applicable test for the Commission to consider is whether the proposed development is in conformity with the certified Local Coastal Program and the public access and public recreation policies of the Coastal Act.

III. Local Government Action and Filing of Appeal

The Santa Barbara County originally gave oral approval for the emergency work on February 23, 2000. Subsequently the County approved an Emergency Coastal Development Permit for the project on March 20, 2000 and issued a Notice of Final Action for an Emergency Permit on March 20, 2000. (See Exhibit 4.)

The Commission received the Notice of Final Action on the project on March 28, 2000. The appeal was filed on April 10, 2000, and was therefore filed within the 10 working day appeal period of the Commission's receipt of the Notice of Final Action as provided by the Commission's administrative regulations.

Pursuant to Section 30261 of the Coastal Act, an appeal hearing must be set within 49 days from the date an appeal of a locally issued Coastal Development Permit is filed. In accordance with the California Code of Regulations, on April 10, 2000 staff requested all relevant documents and materials regarding the subject permit from the County to enable staff to analyze the appeal and prepare a recommendation as to whether a substantial issue exists. The administrative record for the project was received from the County on April 17, 2000.

IV. Staff Recommendation on Substantial Issue

The staff recommends that the Commission determine that substantial issue exists with respect to grounds on which the appeal was filed pursuant to Section 30603 of the Coastal Act and that the Commission take the following action:

Motion

I move that the Commission determine that appeal A-4-STB-00-082 raises NO substantial issue with respect to the grounds on which the appeal has been filed pursuant to Section 30603 of the Coastal Act.

Staff recommends a NO vote on the motion which would result in the finding that the appeal raises substantial issue and adoption of the following findings.

An affirmative vote by a majority of the Commissioners present is required to pass the motion.

V. Findings and Declarations for Substantial Issue

A. Project description

The project proposed by the applicant (Santa Barbara County Parks Department) consists of the installation of 945 feet of rock revetment seawall fronting the Goleta Beach County Park. (The length of seawall actually installed was measured at 1,055 feet by Commission staff on March 7, 2000.) Goleta Beach County Park encompasses approximately 29 acres, with approximately 4/5 mile of sandy beach fronting the park. The rock revetment is comprised of approximately 3,000 tons of rock placed on the upper portion of the beach along the base of an escarpment. The rock is a serpentine material and ranges in size up to 3 feet in diameter. The rocks are placed on a 1:1 to 1.5:1 slope and extend to within 2 to 3 feet of the top of the escarpment, and are placed in a three foot deep trench excavated into the sand beach at the base of the escarpment. The rock revetment seawall varies from of 6 to 8 feet in width at its base.

In addition to the rock revetment seawall, the project includes the temporary installation of four stairways comprised of wooden timbers supported on pre-cast concrete piers, and a temporary wire and metal post safety fence along the top edge of escarpment. (All elements of the project, except the four temporary stairways, were installed between February 24 and March 3, 2000; see Exhibit 4.)

The purpose of the rock revetment seawall is to retard erosion of the toe of the escarpment fronting the seaward side of the Goleta Beach County Park caused by periodic high surf and tides. It would not, however, affect erosion occurring at the top of the escarpment resulting from other erosive processes, including the irrigation of the extensive lawn area. (See Exhibit 4.)

B. Issues Raised by the Appellants

The Appellants allege the project is inconsistent with the Santa Barbara County Local Coastal Program as result of: (1) inconsistency with LCP Policy 3-1 regarding permitted shoreline protective structures; (2) inconsistency with LCP Policy 3-2 regarding adverse impacts adverse impacts on public lateral access, and LCP Policies 7-1 through 7-27 regarding provision of public access to and along the County; (3) inconsistency with LCP Policies 7-6 regarding extensive alteration of the natural environment and LCP Policy 3-14 regarding the fitting development to site topography, and LCP Policy 4-4 regarding conforming development with the scale and character of the existing community; (4) inconsistency with the LCP Policies 9-1 and 7-4 regarding the protection of environmentally sensitive habitats. (See Exhibit 2.)

C. Local Government Action and Filing of Appeal

The Santa Barbara County Board of Supervisors approved an Emergency Coastal Development Permit for the project on March 20, 2000 and issued a Notice of Final Action for Emergency Coastal Development Permit on March 20, 2000.

The Commission received the Notice of Final Action on the project on March 28, 2000. The appeal was filed on April 10, 2000, and was therefore filed within the 10 working day appeal period of the Commission's receipt of the Notice of Final Action as provided by the Commission's administrative regulations.

The project was approved by the County Board of Supervisors with a number of special conditions. These conditions require the applicant to: (a) apply for a Conditional Use Permit and a Development Plan for the installation of beach access stairways within 90 days following the granting of the emergency permit; (b) apply for a regular Coastal Development Permit within 30 days following the approval of the Conditional Use Permit or Development Plan; (c) acknowledge that the construction authorized by the Emergency Permit is temporary only, and is not authorized as permanent until approval of the Conditional Use Permit, Development Permit and any required Coastal Development Permit; and (d); include a request for a 275 foot long rock revetment seawall installed at the western end of the park on or about 1983 without benefit of a permit as part of the permit applications for the work temporarily authorized by the Emergency Permit. (See Exhibit 3.)

D. Substantial Issue Analysis

Section 30603(b)(1) of the Coastal Act stipulates that:

The grounds for an appeal pursuant to subdivision (a) shall be limited to an allegation that the development does not conform to the standards set forth in the certified Local Coastal Program or the public access policies set forth in this division.

As noted above, the project is an integral whole which cannot be segmented for the purposes of analyzing the project's consistency with applicable policies of the Santa Barbara County Local Coastal Program and the access policies of the California Coastal Act. Portions of the seawall may be within the County's original coastal permitting jurisdiction and are subject to appeal to the Commission, while portions are within the Commission's retained original coastal permitting jurisdiction. However, all portions of the rock revetment seawall are functionally interrelated and interdependent on the whole project. Consequently, the substantial issue analysis that follows considers the project in its entirety.

The Appellants' contentions raise valid grounds for an appeal for the reasons set forth below.

1. Permitted Shoreline Protective Structures

The Appellants allege that the County approved the project in a manner inconsistent with the lateral public access standards of LCP Policy 3-1.

LCP Policy 3-1 provides that:

Seawalls shall not be permitted unless the County has determined that there are no other less environmentally damaging alternatives reasonably available for protection of existing principal structures. The County prefers and encourages non-structural solutions to shoreline erosion problems, including beach replenishment, removal of endangered structures and prevention of land division on shorefront property subject to erosion; and, will seek solutions to shoreline hazards on a larger geographic basis than a single lot circumstances. Where permitted, seawall design and construction shall respect to the degree possible natural landforms. Adequate provision for lateral beach access shall be made and

the project shall be designed to minimize visual impacts by the use of appropriate colors and materials. (Emphasis added.)

The proposed project consists of the construction of a rock revetment seawall approximately 1000 feet long, 4 to 6 feet high, and approximately 6 to 8 feet wide at the base. The area immediately landward of the rock revetment seawall is part of the Goleta Beach County Park that is owned and maintained by the Santa Barbara County Parks Department.

The rock revetment seawall protects largely lawn area without any principal structures. Approximately 1,055 feet of rock riprap was installed between February 24, and March 3, 2000 (as measured by Commisison staff on March 7, 2000). Of this total, approximately 217 feet of revetment (20%) was placed to protect approximately 22 public parking spaces (out of a total of 580 spaces); approximately 50 feet of revetment (5%) was placed to protect a public restroom; and the remaining 788 feet of revetment (75%) was placed to protect open lawn area with scattered picnic tables.

The lawn area and picnic tables are clearly not principal structures; therefore, a majority of the revetment (75%) is not needed to protect existing principal structures. Only 25% of the rock revetment seawall serves to protect the restroom and approximately 22 parking spaces. An argument could be made that the 22 parking spaces at the County park qualify as principal structures. Even if you consider both the parking spaces and the public restroom to be principal structures, it appears that only 25% of the length of the rock revetment seawall serves to protect principal structures.

Additionally, the rock revetment seawall does not extend along the entire length of the Goleta Beach County Park frontage, and as a result has the potential to increase downcoast erosion within the park (including additional restroom facilities and the Goleta Beach Café to the east.)

As described in subsequent findings, the rock revetment seawall also adversely impacts lateral beach access, alteration of landforms, scenic and visual resources, and environmentally sensitive habitats. Therefore it would appear that revetment could cause significant environmental damage, both immediately and in the long-term. (See additional discussion below regarding public access.)

The Santa Barbara County Local Coastal Program also provides that no seawall is permitted to protect a principal structure unless there are no feasible less environmentally damaging alternatives. In permitting the proposed structure the County did not consider alternatives such as importation of sand, or sand filled sacks, the relocation of facilities, or a smaller revetment to protect only principal structures. There appear, therefore, to be feasible, less environmentally damaging alternatives. (See Exhibit 3.)

The Commission therefore finds that the Appellants' contention does raise a substantial issue with respect to the shoreline protection structure standards of the County's certified Local Coastal Program.

2. Public Access

The Appellants allege that the County approved the project in a manner inconsistent with the lateral public access standards of LCP Policies 3-1 and 3-2, as well as the public access standards of Sections 30210 and 30211 of the California Coastal Act.

LCP Policy 3-1 provides, in relevant part, that where seawalls are permitted:

Adequate provisions for lateral beach access shall be made . . .

LCP Policy 3-2 provides, in relevant part, that:

Revetments . . . Cliff retaining walls . . . and other such construction that may alter natural shoreline processes shall be permitted when designed to eliminate or mitigate adverse impacts on local shoreline sand supply and so as not to block lateral beach access.

LCP Policies 7-1 through 7-2 impose an affirmative duty on the County to protect and provide public access to and along the shoreline through a variety of programs, development standards, and implementing actions.

Coastal Act Section 30210 provides that:

In carrying out the standards of Section 4 of Article X of the California Constitution, maximum access, which shall be conspicuously posted, and recreational opportunities shall be provided for all the people consistent with public safety needs and the need to protect public rights, rights of private property owners, and natural resource areas from overuse.

Coastal Act Section 30211 provides that:

Development shall not interfere with the public's right of access to the sea where acquired through use or legislative authorization, including, but not limited to, the use of dry sand and rocky coastal beaches to the first line of terrestrial vegetation.

The proposed project consists of the construction of a rock revetment seawall approximately 1000 feet long, 4 to 6 feet height, and approximately 6 to 8 feet wide at the base. The area immediately landward of the rock revetment seawall is part of the Goleta Beach County Park owned and maintained by the Santa Barbara County Parks Department. The beach width at Goleta Beach County Park is generally several hundred feet, but varies seasonally, and also episodically in response to tides and periodic storm waves. The beach is generally narrower at the west end (up-coast) end and wider at the east (down-coast end). The Goleta beach is intensively used by local residents and visitors for a variety of recreational activities, including strolling, surfing, running, sunbathing, fishing, and scuba diving. Access to the beach is directly from the upland area, which is only slightly elevated above the adjacent beach. (See Exhibits 3.)

The proposed seawall would have a direct impact on lateral public beach access opportunities, by displacing approximately 6,000 square feet of existing beach as a result of the rock revetment seawall footprint. The proposed seawall would also have long-term effects on lateral public beach access as a result of seawall generated erosion of the sand beach.

The Commission has previously found that upon construction of the seawall, the position of the landward boundary of the beach is artificially fixed. On any stretch of coast that is undergoing periodic retreat, the width of the beach will progressively decline if a coastal protection device is constructed. This is because of the erosion and landward retreat of the marine terrace seaward of the structure (i.e., bedrock platform which supports the beach sand) continues at the natural rate, equivalent to the retreat rate of the adjacent shoreline escarpment prior to the installation of the seawall. As the bedrock terrace retreats landward, the shoreline position retreats toward the fixed position of the seawall and the beach narrows. Without the rock revetment seawall, the shoreline escarpment and bedrock terrace retreat landward together at the same rate. Thus, the width of the beach at any particular location remains relatively constant over time in the absence of an artificial obstruction such as a seawall. A long-term narrowing of beach width by this process would correspondingly result in a long-term increase in the restriction of lateral access along the beach. This would be in addition to the immediate loss of the beach area as a result of the displacement caused by the rock revetment seawall.

As noted above, the beach fronting Goleta Beach is a heavily used beach serving the Goleta Valley, as well as the student residential community of Isla Vista. Because of the naturally thin veneer of sand over the wave-cut platform, the sand beach is highly sensitive to alterations of the littoral environment which would reduce the amount of sand reaching the beach or accumulating on the wave cut terrace. The proposed seawall would exacerbate natural seasonal fluctuations in the amount of sand (and the consequent width of the beach) and result in the long term loss of the beach, and related public beach access. These effects are the result of a number of coastal processes influenced or

induced by the seawall, including: (1) increasing the amount of wave reflection at the seaward face of the seawall, thus increasing beach sand scour; and (2) preventing the natural retreat of the shoreline escarpment in response to wave attack, thus preventing the landward shift of the fronting beach as adjoining, unprotected reaches of bluff retreat.

In summary, the proposed seawall project could result in substantial impacts to lateral public access by directly displacing existing public beach area, and by causing the long-term permanent loss of additional beach area through erosion and deprivation of the littoral sand supply. The County did not consider these impacts in the issuance of the Emergency Permit, but deferred their consideration to a long-term beach erosion study with no set time-line.

The Commission therefore finds that the Appellants' contention does raise a substantial issue with respect to the public access standards of the County's certified Local Coastal Program and the Coastal Act.

3. Alteration of Landforms and Scenic and Visual Resources

The Appellants allege that the County approved the project in a manner inconsistent with the scenic and visual resource protection standards of LCP Policies 3-1, 3-14, 4-4, and 7-6.

LCP Policy 3-1 provides, in relevant part, that:

Where permitted, seawall design and construction shall respect to the degree possible natural landforms . . . and the project shall be designed to minimize visual impacts by the use of appropriate colors and materials.

LCP Policy 3-14 provides that:

All development shall be designed to fit the site topography, soils, geology, hydrology, and any other existing conditions and be oriented so that grading and other site preparation is kept to an obsolete minimum. Natural features, landforms, and native vegetation, such as trees, shall be preserved to the maximum extent feasible. Areas of the site which are not suited for development because of known soil, geologic, flood, erosion or other hazards shall remain in open space.

LCP Policy 4-4 provides, in relevant part, that:

In areas designated as urban on the land use plan maps, and in designated rural neighborhoods, new structures shall be in conformance with the scale and character of the existing community.

LCP Policy 7-6 provides that:

Recreational uses on oceanfront lands, both public and private, that do not require extensive alteration of the natural environment (i.e., tent campgrounds) shall have priority over uses requiring substantial alteration (i.e., recreational vehicle campgrounds).

Prior to the installation of the rock revetment seawall, the interface between the open space area and the sandy beach of the Goleta Beach was characterized by a gentle slope or small escarpment. The periodic erosion which this location has experienced as a result of high tides and surf has been off-set by a landward extension of the sand beach, which itself experiences season fluctuations in width and height. The installation of the rock revetment seawall has created a permanent, sharp, unnatural, and impassible transition between the upland lawn area and the sandy beach portions of Goleta Beach County Park. The installation of the rock revetment seawall has created a highly visible structure ranging in height between 4 and 6 feet and between 6 and 8 feet in width, creating a sharp transition between the upland lawn area and the sandy beach. The shoreline frontage has taken on the character of an armored shoreline rather than a beach park frontage. (See Exhibit 3.) The County did not consider these impacts in the issuance of the Emergency Permit, but deferred their consideration to a long-term beach erosion study with no set time-line.

The Commission therefore finds that the Appellants' contention does raise a substantial issue with respect to the alternation of landforms and the scenic and visual standards of the County's certified Local Coastal Program.

4. Environmentally Sensitive Habitats

The Appellant alleges that the County approved the project in a manner inconsistent with the environmentally sensitive habitat protection standards of LCP Policies 9-1 and 7-4.

LCP Policy 9-1 stipulates that:

Prior to the issuance of a development permit, all projects on parcels shown on the land use plan and /or resource maps with a Habitat Area overlay designation or within 250 feet of such designation or projects affecting an environmentally sensitive habitat shall be found to be in

conformity with the applicable habitat protection policies of the land use plan.

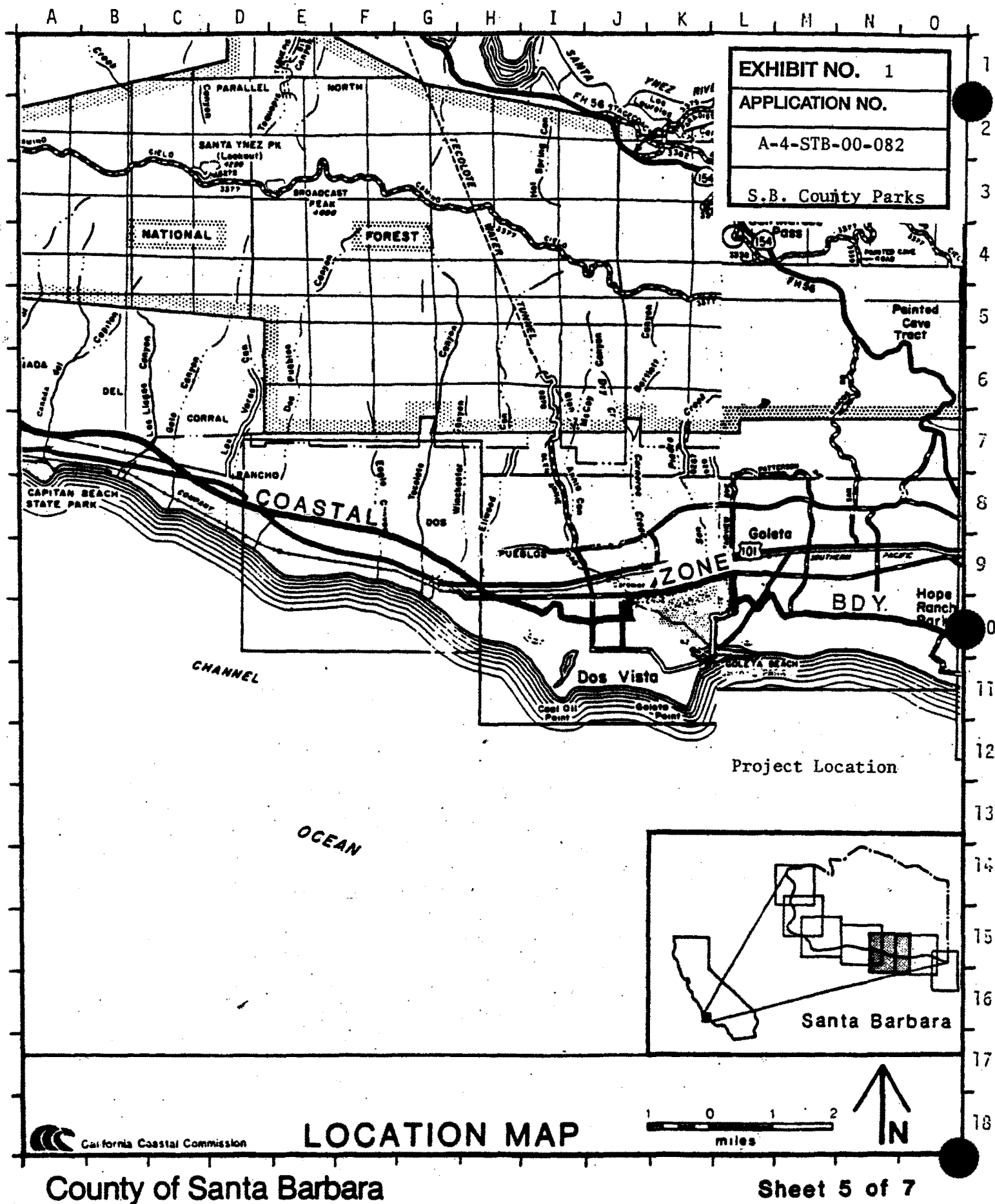
LCP Policy 7-4 stipulates that:

The County, or appropriate public agency, shall determine the environmental carrying capacity for all existing and proposed recreational areas sited on or adjacent to dunes, wetlands, streams, tidepools or any other areas designated Habitat Areas by the land use plan. A management program to control the kinds intensities, and location of recreational activities so that habitat resources are preserved shall be developed, implemented, and enforced. The level of facility development (i.e., parking spaces camper sites, etc. shall be correlated with the environmental carrying capacity.

The coastal strand habitat fronting the Goleta County beach currently supports a number of sensitive species, including the California grunion, the Belding's Savannah sparrow, a state listed endangered species, and possibly the Western snowy plover, a federally listed threatened species.

The rock revetment seawall has displaced natural coastal strand habitat, which is used by a variety of sensitive species of plants and animals, including the Belding's Savannah sparrow, a state listed endangered species which forages on the beach at the west end of the Goleta Beach County Park. Habitat for the federally listed Western Snowy Plover has already been severely impacted by the development of the Goleta Beach County Park, eliminating historic nesting sites, and degrading the over-wintering areas along the shoreline frontage of the park. Remnants of the coastal strand habitat occur at the west end of the park, but have been further degraded or displaced by previously unpermitted rock revetment seawall construction. Prior to the installation of the rock revetment seawall, the site exhibited a more gradual transition between the upland areas and the adjacent sand beach, with a seasonally fluctuating small escarpment. The installation of the rock revetment seawall has created a sharp transition between the upland lawn area and the sandy beach and reduced further the areal extent of the coastal strand habitat. (See Exhibit 3.) The County did not consider these impacts in the issuance of the Emergency Permit, but deferred their consideration to a long-term beach erosion study with no set time-line.

The Commission therefore finds that the Appellants' contention does raise a substantial issue with respect to the environmentally sensitive habitat protection standards of the County's certified Local Coastal Program.



CALIFORNIA COASTAL COMMISSION

SOUTH CENTRAL COAST AREA
89 SOUTH CALIFORNIA ST., 2ND FLOOR
VENTURA, CA 93001
(805) 641-0142

APPEAL FROM COASTAL PERMIT
DECISION OF LOCAL GOVERNMENT



Please Review Attached Appeal Information Sheet Prior To Completing This Form.

EXHIBIT NO. 2

APPLICATION NO.

A-4STB-00-082

S.B. County Parks

SECTION I. Appellant(s)

Name, mailing address and telephone number of appellant(s):

Commissioners Pedro Nava and Sara Wan

Page 1 of 6

California Coastal Commission

45 Fremont Street, Suite 200

(415) 904-5200

San Francisco, CA Zip 94105

Area Code

Phone No.

SECTION II. Decision Being Appealed

1. Name of local/port
government: County of Santa Barbara, Parks Department

2. Brief description of development being
appealed: Installation of approximately 1,000 linear feet of rock rip-
rap shoreline protection

3. Development's location (street address, assessor's parcel
no., cross street, etc.): Goleta County Beach Park
Santa Barbara County

4. Description of decision being appealed:

a. Approval; no special conditions: _____

b. Approval with special conditions: _____

c. Denial: _____

Note: For jurisdictions with a total LCP, denial
decisions by a local government cannot be appealed unless
the development is a major energy or public works project.
Denial decisions by port governments are not appealable.

TO BE COMPLETED BY COMMISSION:APPEAL NO: A-4STB-00-082DATE FILED: April 7, 2000DISTRICT: South Central

H5: 4/88

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CALIFORNIA
COASTAL COMMISSION
SOUTH CENTRAL COAST DISTRICT

APPEAL FROM COASTAL PERMIT DECISION OF LOCAL GOVERNMENT (Page 2)

5. Decision being appealed was made by (check one):

- a. ☒ Planning Director/Zoning Administrator c. ☐ Planning Commission
b. ☐ City Council/Board of Supervisors d. ☐ Other _____

6. Date of local government's decision: March 20, 2000

7. Local government's file number (if any): 00-EMP-002

SECTION III. Identification of Other Interested Persons

Give the names and addresses of the following parties. (Use additional paper as necessary.)

a. Name and mailing address of permit applicant:

Jennifer Briggs, Director
County of Santa Barbara, Parks Department
610 Mission Canyon Road
Santa Barbara, CA 93105

b. Names and mailing addresses as available of those who testified (either verbally or in writing) at the city/county/port hearing(s). Include other parties which you know to be interested and should receive notice of this appeal.

- (1) Brian Trautwein
Environmental Defense Center
906 Garden Street
Santa Barbara, CA 93101
- (2) _____

- (3) _____

- (4) _____

SECTION IV. Reasons Supporting This Appeal

Note: Appeals of local government coastal permit decisions are limited by a variety of factors and requirements of the Coastal Act. Please review the appeal information sheet for assistance in completing this section, which continues on the next page.

APPEAL FROM COASTAL PERMIT DECISION OF LOCAL GOVERNMENT (Page 3)

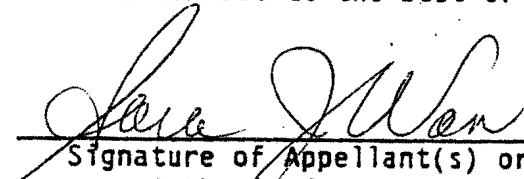
State briefly your reasons for this appeal. Include a summary description of Local Coastal Program, Land Use Plan, or Port Master Plan policies and requirements in which you believe the project is inconsistent and the reasons the decision warrants a new hearing. (Use additional paper as necessary.)

See Attached "Reasons for Appeal"

Note: The above description need not be a complete or exhaustive statement of your reasons of appeal; however, there must be sufficient discussion for staff to determine that the appeal is allowed by law. The appellant, subsequent to filing the appeal, may submit additional information to the staff and/or Commission to support the appeal request.

SECTION V. Certification

The information and facts stated above are correct to the best of my/our knowledge.



Signature of Appellant(s) or
Authorized Agent

Date _____

NOTE: If signed by agent, appellant(s) must also sign below.

Section VI. Agent Authorization

I/We hereby authorize _____ to act as my/our representative and to bind me/us in all matters concerning this appeal.

Signature of Appellant(s)

Date _____

APPEAL FROM COASTAL PERMIT DECISION OF LOCAL GOVERNMENT (Page 3)

State briefly your reasons for this appeal. Include a summary description of Local Coastal Program, Land Use Plan, or Port Master Plan policies and requirements in which you believe the project is inconsistent and the reasons the decision warrants a new hearing. (Use additional paper as necessary.)

See Attached "Reasons for Appeal"

Note: The above description need not be a complete or exhaustive statement of your reasons of appeal; however, there must be sufficient discussion for staff to determine that the appeal is allowed by law. The appellant, subsequent to filing the appeal, may submit additional information to the staff and/or Commission to support the appeal request.

SECTION V. Certification

The information and facts stated above are correct to the best of my/our knowledge.



Signature of Appellant(s) or
Authorized Agent

Date _____

NOTE: If signed by agent, appellant(s) must also sign below.

Section VI. Agent Authorization

I/We hereby authorize _____ to act as my/our representative and to bind me/us in all matters concerning this appeal.

Signature of Appellant(s)

Date _____

Goleta Beach Seawall Appeal

Reasons for Appeal

Appeal of the installation of approximately 1,000 linear feet of un-grouted rock riprap along the seaward frontage of Goleta Beach County Park is based on the following grounds.

The shoreline protection device installed is inconsistent with the County of Santa Barbara's Local Coastal Program policies regarding seawalls and shoreline structures, environmentally sensitive habitats, coastal access, and scenic and visual resources.

Policy 3-1 prohibits the use of seawalls "unless the County has determined that there are no other less environmentally damaging alternatives reasonably available for the protection of existing principal structures." The rock riprap structure protects largely lawn area without any principal structures. Of the 1,055 feet of rock riprap installed between February 24, and March 3, 2000, approximately 217 feet (21%) was placed to protect approximately 7 public parking spaces, approximately 50 feet (5%) was placed to protect a public restroom, and the remaining 788 feet (75%) was placed to protect open lawn area with scattered picnic tables. With the exception of the public restroom and possibly the 7 public parking spaces, no principal structures were threatened by erosion, and the rock riprap does not serve to protect principal structures. Further, in permitting the proposed structure the County did not consider alternatives such as importation of sand, or sand filled sacks, or relocation of facilities.

Policy 3-2 provides that shoreline protective devices "that may alter natural shoreline processes shall be permitted when designed to eliminate or mitigate adverse impact to local shoreline sand supply and so as not to block lateral beach access." Policies 7-1 through 7-27 require the protection and provision of public access to and along the County's coast. Specifically, Policy 7-6 requires that "Recreational uses on ocean front lands, both public and private, that do not require extensive alteration of the natural environment . . . shall have priority over uses which require substantial alteration. ." Additionally, Act Policies 30210 through 30214 require the protection provision of maximum public access to and along the shoreline consistent with other Coastal Act policies. The rock riprap has the potential to prevent the natural inland migration of the sand beach fronting the area, and thus may result in the narrowing of the beach over time as adjacent unprotected areas retreat. The footprint of the rock riprap, which varies from 3 to 8 feet, displaces approximately 6,000 square feet of sandy beach area. The rock riprap forms a 4 to 6 high rock wall which is dangerous to traverse, and impedes the vertical access from the upland portion to the sand beach portion of Goleta Beach County Park which was previously available along a 1000 linear beach frontage. Additionally, the rock riprap does not extend along the entire length of the Goleta Beach County Park frontage, and as a result, has the potential to increase downcoast erosion within the park (including additional restroom facilities, and the Goleta Beach Café).

Policy 3-14 requires that all development "shall be designed to fit the site topography . . . and natural features, landforms shall be preserved to the maximum extent feasible." Prior to the installation of the rock riprap, the site exhibited a gradual transition between the upland lawn areas and the adjacent sand beach. The periodic erosion which this location has experienced as a result of high tides and surf has been off-set by a landward extension of the sand beach, which itself experiences season fluctuations in width and height. The installation of the rock riprap has created a sharp, unnatural, and impassible transition between the upland lawn area and the sandy beach portions of Goleta Beach County Park. The shoreline frontage has been transformed from a park frontage to an armored shoreline.

Policy 4-4 requires that "In areas designated as urban on the land use plan maps . . . new structures shall be in conformance with the scale and character of the existing community." Prior to the installation of the rock riprap, the site exhibited a gradual transition between the upland

lawn areas and the adjacent sand beach. The installation of the rock riprap has created a highly visible structure ranging in height between 4 and 6 feet and between 3 and 8 feet in width, creating a sharp and impassible transition between the upland lawn area and the sandy beach. The shoreline frontage has taken on the character of an armored shoreline rather than a beach park frontage.

Policy 9-1 requires that "Prior to the issuance of a development permit, all projects on parcels shown on the land use plan and /or resource maps with a Habitat Area overlay designation or within 250 feet of such designation or projects affecting an environmentally sensitive habitat shall be found to be in conformity with the applicable habitat protection policies of the land use plan." The coastal strand habitat fronting the Goleta County beach supports a number of sensitive species, including the California grunion, the Belding's Savannah sparrow, a state listed endangered species, and possible the Western snow plover, a federally listed threatened species.

Policy 7-4 provides that the County "or appropriate public agency, shall determine the environmental carrying capacity for all existing and proposed recreational areas sited on or adjacent to dunes, wetlands, streams, tidepools or any other areas designated Habitat Areas by the land use plan. A management program to control the kind intensities, and location of recreational activities so that habitat resource are preserved shall be developed implemented, and enforced. The level of facility development (i.e., parking spaces camper sites, etc. shall be correlated with the environmental carrying capacity".

The rock rip rap has displaced natural sand beach habitat, which is used by a variety of sensitive species of plant and animals, including the Belding's Savannah sparrow, a state listed endangered species which forages on the beach at the west end of the Goleta Beach County Park. This habitat has been already severely impacted by the development of the Goleta Beach County Park. Remnants of the coastal strand habitat occurred at the west end of the Park. Prior to the installation of the rock riprap, the site exhibited a gradual transition between the upland lawn areas and the adjacent sand beach. The installation of the rock riprap has created a sharp transition between the upland lawn area and the sandy beach and reduced further the areal extent of the coastal strand habitat.

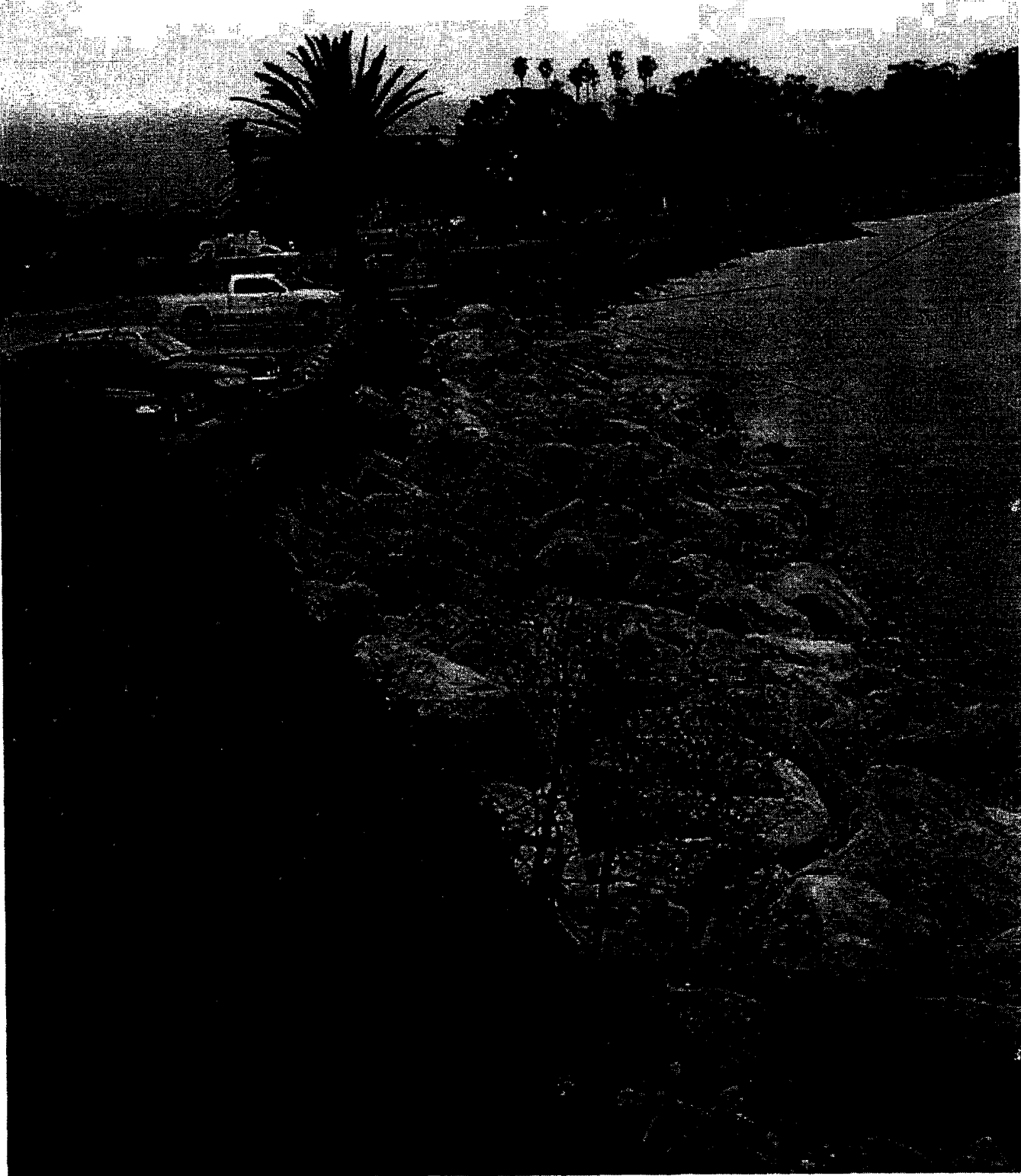
EXHIBIT NO. 3

APPLICATION NO.

A-4-STB-00-082

S.B. County Parks

Page 1 of 5



Wall

West End of Goleta Beach Park

3/7/2000



3/7/2000

West End of Goleta Beach Park



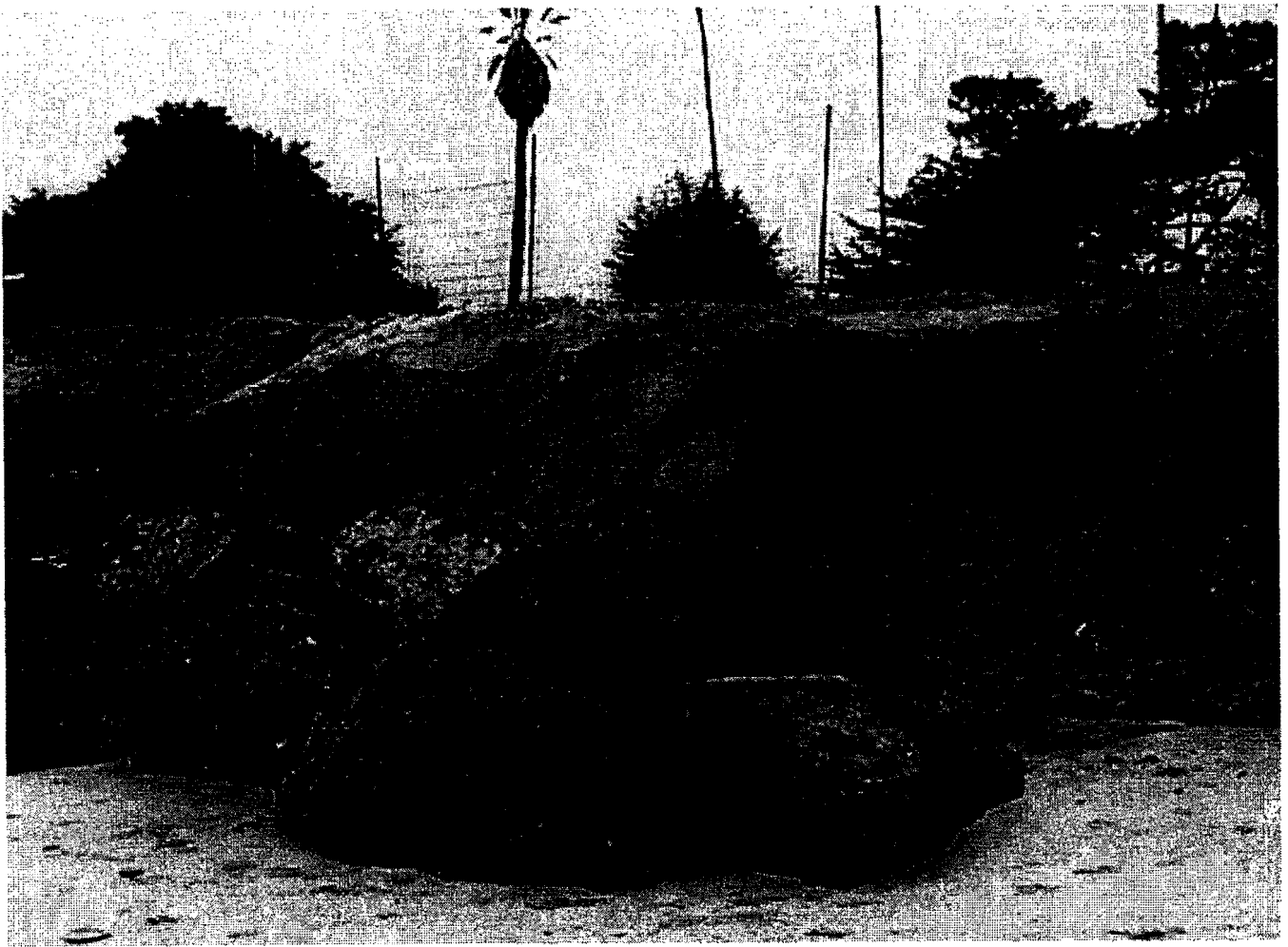
Middle Section Goleta Beach Park

3/7/2000



East End Goleta Beach Park

3/7/2000



East End Goleta Beach Park

3/7/2000



County of Santa Barbara Planning and Development

John Patton, Director

Emergency Permit No.: 00-EMP-002

EMERGENCY PERMIT

This Emergency Permit confirms the verbal authorization granted by the Director of Planning and Development on February 23, 2000.

This is to inform you that an Emergency Permit has been approved for the emergency work that you or your representatives feel is necessary at the location listed below. According to the information provided in your emergency permit application, existing public recreational facilities at Goleta Beach County Park have suffered substantial damage due to ocean wave action since February 20, 2000. Approximately 10-35 feet of picnic area (lawn, irrigation system and picnic tables) eroded away in the recent storms. In addition, sections of the existing parking lot were lost due to wave erosion. Portions of the remaining parking lot, the remaining lawn area, the existing public restroom and existing public utilities (water, gas and sewer pipelines) were threatened by continued erosion. Therefore, this situation constituted an emergency in accordance with Section 35-58 and 35-171 of the Coastal Zoning Ordinance and immediate action was warranted. Verbal authorization to proceed with the emergency work was granted by the Director of Planning and Development on February 23, 2000. The emergency work is hereby approved; however, it is to be accomplished subject to the enclosed conditions. Please sign and return the attached Acceptance Form.

RECEIVED

APR 17 2000

CALIFORNIA
COASTAL COMMISSION
SOUTH CENTRAL COAST DISTRICT

Sincerely,

JOHN PATTON
Director

APPLICANT: County of Santa Barbara, Parks Department
610 Mission Canyon Road, Santa Barbara CA 93105
(Staff: Coleen Lund)

APNs: 071-200-017

PROJECT ADDRESS: 5986 Sandspit Road, Goleta CA 93117

DATE OF ISSUANCE: March 20, 2000

(Verbal approval for the work was granted on 2-23-00. The work was accomplished between February 24, 2000 and March 3, 2000.)

EXHIBIT NO.	4
APPLICATION NO.	
A-4-STB-00-082	

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BACKGROUND: As a result of ocean wave action during recent winter storms, the existing public recreational facilities at Goleta Beach County Park suffered substantial damage. Since February 20, 2000, approximately 10-35 feet of picnic area (lawn, irrigation system and picnic tables) eroded away. In addition, sections of the existing parking lot were lost due to wave erosion. Portions of the remaining parking lot, the remaining lawn area, the existing public restroom and existing public utilities (water, gas and sewer pipelines) are threatened by continued erosion. Given the rapid loss of existing developed public facilities and the threat to the remaining facilities, prompt action is warranted to prevent further, potentially immediate, damage due to continued wave and tidal action. Because there are no readily available alternatives and the proposed emergency work (the construction of a rock revetment seawall to protect public recreational facilities), based on preliminary analysis, could be found consistent with applicable coastal plan policies, Planning and Development granted verbal authorization on 2-23-00 for the proposed work to proceed. This Emergency Permit confirms that authorization. However, alternative solutions (e.g. beach nourishment, removal of the seawall, in-place burial of the seawall with lawn reconstruction, etc.) will be evaluated through the required permit review process.

EMERGENCY WORK: The emergency work authorized under this Emergency Permit is limited to the temporary installation of a rock revetment seawall along 945 feet of coastline at Goleta Beach County Park. (Refer to the map included as Attachment B of this permit). This seawall, installed between 2-24-00 and 3-3-00, is comprised of approximately 3,000 tons of rock (boulders) placed at the landward edge of the beach along the base of a six to eleven feet high eroded vertical bank which forms the edge of the developed beach park (picnic area lawn and parking lot). The rocks are up to 3 feet in diameter and have been placed in a 1:1 to 1.5:1 slope extending to within 2-3 feet of the elevation of the top of the bank. The rocks at the base of the seawall are placed in a two to three foot deep trench excavated into the beach at the base of the eroded bank.

In addition to the rock revetment seawall, a temporary wire and metal post safety fence has been installed along the edge of the lawn to limit the potential for users of the public park to climb on the temporary seawall. Four temporary stairways will also be installed to allow continued public access to the beach. These temporary stairways are anticipated to be comprised of wooden timbers supported by poured or pre-cast concrete pier blocks.

Installation of the seawall occurred over a 9-day period from 2-24-00 to 3-3-00. Safety fencing has been installed and the work was monitored by County Parks Department staff to prevent safety hazards to the users of the public park. The temporary stairways are anticipated to be designed and constructed within 60 days.

PROCEDURE FOR OBTAINING AN EMERGENCY PERMIT

1. Verbal or written notification of the type and location of the work undertaken must be given to this Department within a reasonable amount of time.
2. This Department approves and sends out an Emergency Permit with an attached Acceptance Form to the property owner or authorized agent.
3. The property owner or authorized agent shall sign and return the Acceptance Form within seven (7) working days to the Planning and Development Department, Development Review Division.

EMERGENCY PERMIT CONDITIONS OF APPROVAL

1. The applicant is required to apply for a Conditional Use Permit to validate the emergency work pertaining to the seawall and a Development Plan for the installation of beach access stairways. Initial applications and filing fees for a Conditional Use Permit and a Development Plan shall be submitted to the County no later than 90 days following the granting of this permit.
2. The applicant is required to apply for a Coastal Development Permit to implement the Conditional Use Permit and Development Plan, and to validate the emergency work. An application for a Coastal Development Permit shall be made no later than 30 days following final approval of the Conditional Use Permit or Development Plan. *(Note: This seawall may be within the permit jurisdiction of the California Coastal Commission. If so, the permit requirements imposed by that Commission shall be applicable.)*
3. The construction or other work temporarily authorized by this Emergency Permit is not authorized as permanent until approval of the Conditional Use Permit and Development Plan, and issuance of the required Coastal Development Permit.
4. The enclosed Acceptance Form must be signed by the applicant and returned to Planning and Development within (7) working days.
5. Only that emergency work specifically requested and for the specific property mentioned is authorized. Any additional emergency work requires separate authorization from the Director of Planning and Development. The work authorized by this permit must be commenced within 30 days of the date of issuance of the permit and completed within 60 days after the beginning of construction. If construction activities are proposed by the applicant to commence after 60 days, separate authorization by the Director of Planning and Development is required. If the required permits (see conditions 1 and 2 above) are not applied for within the amount of time specified, the property will be in violation of the zoning ordinance.

6. This permit does not preclude the necessity to obtain authorization and/or permits from other County Departments or other agencies.
7. In the event that public controversy arises, Planning and Development reserves the right to require the applicant to stop work immediately until P&D determines whether the issues raised present substantial coastal policy consistency issues that must be addressed through processing of the seawall request through the normal (non-emergency) permit process. If P&D determines that processing through the normal procedures is required, no further work may be conducted under the authority of this Emergency Permit.
8. A rock revetment seawall approximately 275 feet long was installed at the western end of the subject property on or about 1983 without the benefit of permit. This unpermitted seawall constitutes a violation of the Article II Coastal Zoning Ordinance which must be abated prior to the approval of a Conditional Use Permit, Development Plan or Coastal Development Permit. The permit applications required under Conditions of Approval 1 and 2 above must include a request to either validate (make permanent) or to remove this unpermitted seawall.
9. During all construction work involving mechanized equipment on the beach, an onsite safety monitor retained by the applicant shall direct members of the public around the construction site to avoid potential safety hazards.

FINDINGS OF APPROVAL

1. The approval of this project shall not be held to permit or to be an approval of a violation of any provision of any County Ordinance or State Law.
2. Pursuant to Section 35-171.5 of Article II, an Emergency Permit may be granted if the Director of the Planning and Development Department makes the following findings:
 - a. *An emergency exists and requires action more quickly than provided for by the procedures for ordinary permits, and the action will be completed within 30 days unless otherwise specified by the terms of the permit.*

According to the information provided in the emergency permit application, and as observed in inspections by P&D staff, existing public recreational facilities at Goleta Beach County Park suffered substantial damage due to ocean wave action beginning on or about February 20, 2000. Approximately 10-35 feet of picnic area (lawn, irrigation system and picnic tables) eroded away in the recent storms. In addition, sections of the existing parking lot were lost due to wave erosion. Portions

of the remaining parking lot, the remaining lawn area, the existing public restroom and existing public utilities (water, gas and sewer pipelines) were threatened by continued erosion. Therefore, the situation constituted an emergency in accordance with Section 35-58 and 35-171 of the Coastal Zoning Ordinance and immediate action (i.e. action is more quickly than provided for by the procedures for ordinary permits) was warranted.

- b. *Public comment on the proposed emergency action has been reviewed if time allows.*

The damage to the existing public recreational facilities was rapid and ongoing such that verbal authorization for installation of the proposed seawall was granted by the Director of Planning and Development on February 23, 2000. Time did not allow for the collection and review of public comment prior to the onset of the work. The follow-up Conditional Use Permit, Development Plan and Coastal Development Permit necessary to validate the issuance of the Emergency Permit will be publicly noticed, allowing a full opportunity for public involvement in the review process.

- c. *The action proposed is consistent with the requirements of the certified Local Coastal Plan and Coastal Zoning Ordinance.*

A primary goal of the Local Coastal Program (LCP) is to provide maximum opportunities for public use and enjoyment of the coast. Section 30210 of the Coastal Act (a part of the LCP) reads as follows:

Coastal Act Policy 30210:

In carrying out the requirement of Section 4 of Article X of the California Constitution, maximum access, which shall be conspicuously posted, and recreational opportunities shall be provided for all the people consistent with public safety needs and the need to protect public rights, rights of private property owners and natural resource areas from overuse.

Seawalls have the potential to cause adverse effects on the beach. These potential impacts include a long-term and progressive reduction in beach width and lateral access, accelerated erosion on adjacent unprotected properties and increased scour of beach sand. These adverse effects on public use of the beach, if determined through the environmental analysis required under the California Environmental Quality Act (CEQA) to be an impact of the particular proposed seawall under consideration, must be balanced against the public benefit of seawall installation. In this particular case, a seawall could be found consistent with the public access and recreational policies because it would protect existing public coastal access and recreational facilities. Thus, for purposes of the temporary authorization granted

under this Emergency Permit, the proposed seawall is considered consistent with the Local Coastal Program. However, alternative solutions (e.g. beach nourishment, removal of the seawall, in-place burial of the seawall with lawn reconstruction, etc.) will be evaluated through the required permit review process. Upon obtaining the required Conditional Use Permit and Coastal Development Permit, the seawall would be in compliance with the Article II Coastal Zoning Ordinance.

The proposed beach access stairways would be consistent with the LCP as such facilities are specifically allowed under Policy 3-7. Upon obtaining the required Development Plan and Coastal Development Permit, the proposed stairways would be in compliance with the Article II Coastal Zoning Ordinance.

In order to ensure the protection of the health and safety of the public and the preservation of the coastal environment, the Coastal Zoning Ordinance (Article II) was established to set standards for orderly development in the coastal zone that provide for the protection of the health and safety of the general population. The emergency action requested by the applicant is permitted under Section 35-171 of the Coastal Zoning Ordinance which recognizes that certain actions warrant immediate, special consideration in order to lessen or remediate an emergency. Section 35-171 also provides that the emergency action will be subject to the normal restrictions imposed under the ordinance within a reasonable amount of time. The authorized emergency work is necessary to reduce the potential for damage to existing public recreational facilities.

3. This action is exempt from the provisions of the California Environmental Quality Act, pursuant to State CEQA Guidelines Section 15269, statutory exemption for emergency projects.

Attachments:

Attachment A: Acceptance Form
Attachment B: Site Plan

cc: Jackie Campbell, P&D
Brian R. Baca, P&D
Susan Rose, 2nd District Supervisor
Mark Capelli - California Coastal Commission



County of Santa Barbara Planning and Development

John Patton, Director

EMERGENCY PERMIT

ACCEPTANCE FORM

Emergency Permit No.: 00-EMP-002

I hereby understand and agree to all of the conditions of the emergency permit being issued. I understand that the emergency permit is temporary and that an applicable coastal permits (Conditional Use Permit, Development Plan and Coastal Development Permit) are necessary to validate the emergency work as permanent.

Please indicate below why the emergency actions was taken. Sign this form and return it within seven (7) working days to the Planning and Development Department, Development Review Division.

Reason this action is necessary: The action taken under this emergency permit is necessary to protect the park facilities and infrastructure from further loss. The stairs are necessary to continue to offer safe public beach access over the rock revetment. County Parks proposes to look at alternative methods and/or structures to protect the park facilities. As such, it is proposed that a consultant team, involving a stakeholders committee, would be formed to review and evaluate methods to protect the park from further erosion. The process proposed to evaluate these alternatives may exceed the 90 day requirement for submittal of the required CDP and DP permit applications. If the 90 day period appears as though it will expire, County Parks will prepare a request for an

Jennifer Briggs
Signature

3/23/00
Date

(see below*)

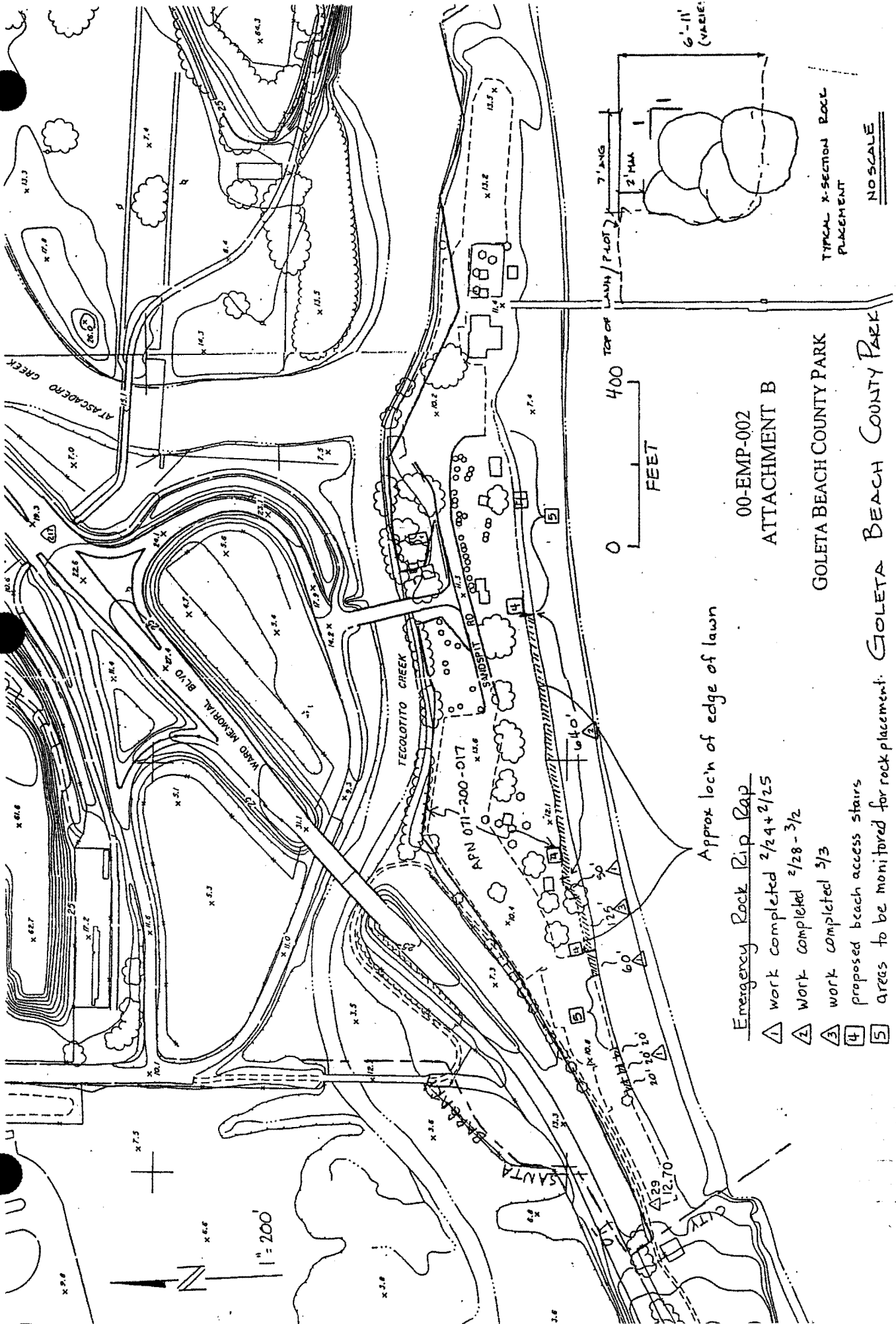
Jennifer Briggs - Director of Parks
Name

Santa Barbara County Parks
Agent for

610 Mission Canyon Road, Santa Barbara, CA 93105
Address

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*extension. The request will include a proposed schedule for Planning & Development's review and consideration in granting the extension.



00-EMP-002 ATTACHMENT B

GOLETA BEACH COUNTY PARK
GOLETA BEACH COUNTY PARK

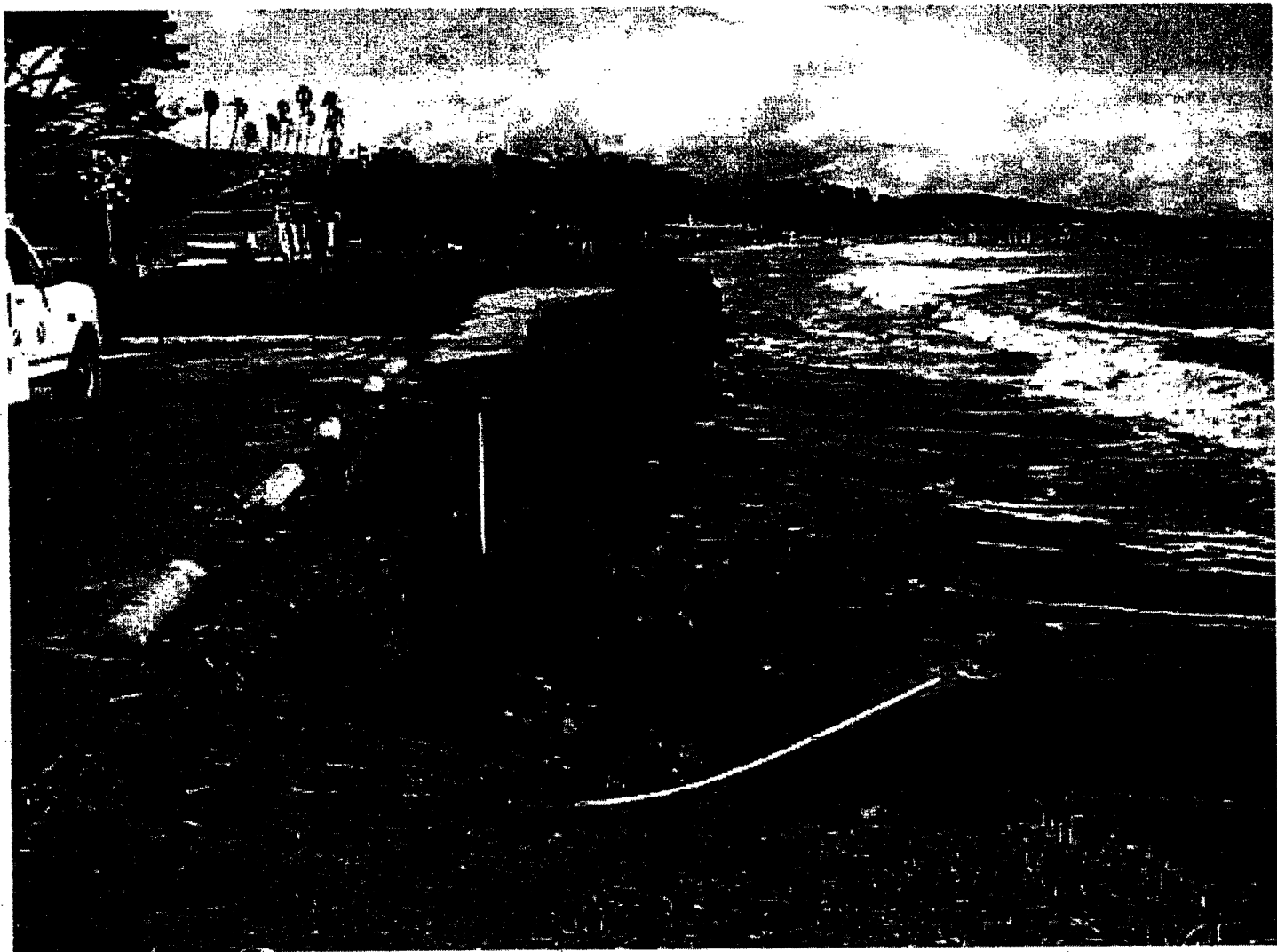
Approx loc'n of edge of lawn

Emergency Rock Rip Rap

- 1 work completed 2/24+2/25
- 2 work completed 2/28-3/2
- 3 work completed 3/3
- 4 proposed beach access stairs
- 5 areas to be monitored for rock placement

TYPICAL X-SECTION ROCK
PLACEMENT

NO SCALE



West End Goleta Beach Park

2/23/2009

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APR 17 2000

CALIFORNIA
COUNTY OF SANTA BARBARA
SOUTH CENTRAL COAST DISTRICT

EXHIBIT NO. 5

APPLICATION NO.

A-4-STB-00-082

S.B. County Parks



West End Goleta Beach Park

2/23/7000

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CALIFORNIA
COASTAL COMMISSION
SOUTH CENTRAL COAST DISTRICT



West End Goleta Beach Park

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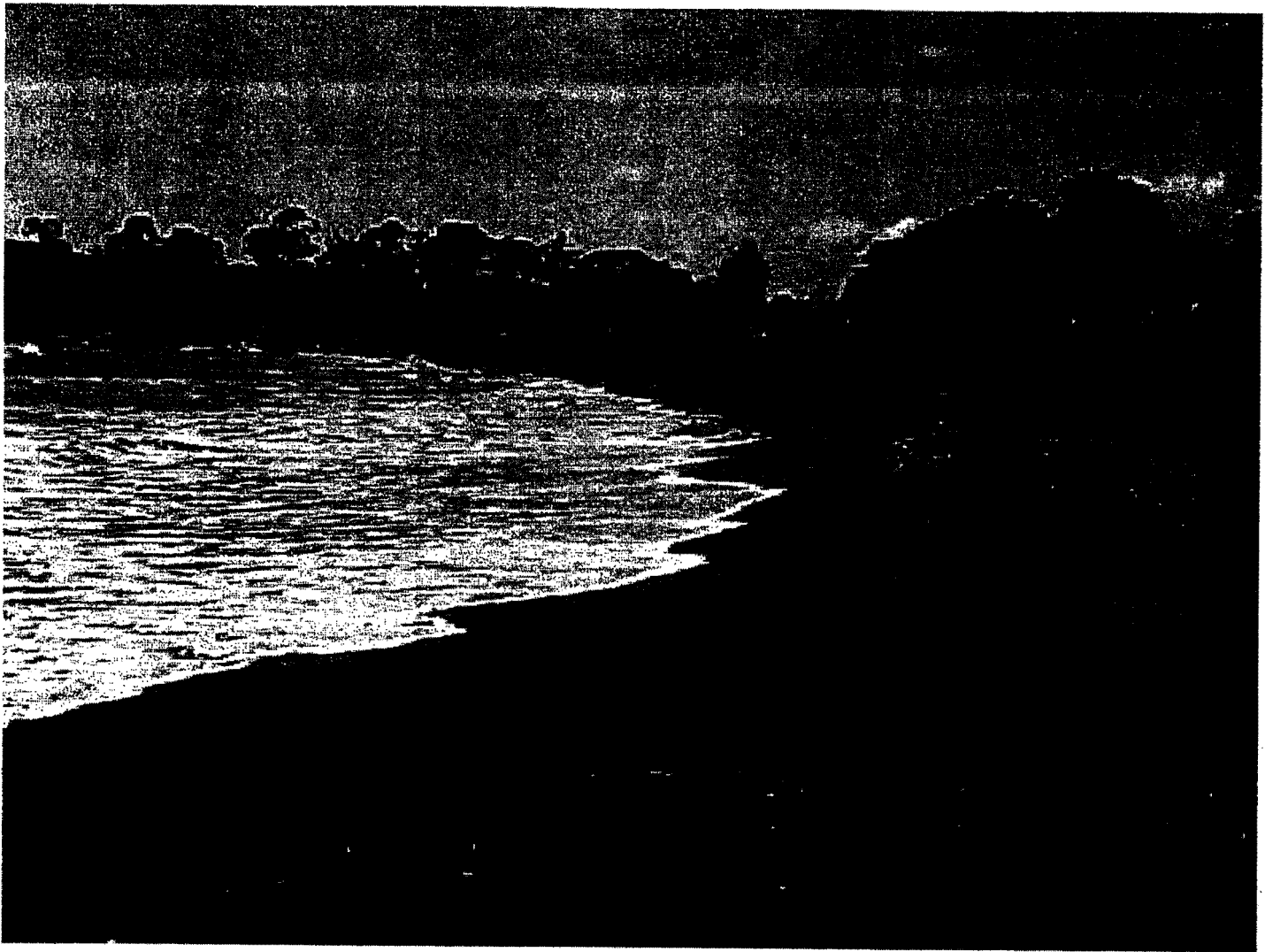
Middle Section Goleta Beach Park

3/12/2000

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East End Goleta Beach Park

2/23/2000

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