CALIFORNIA COASTAL COMMISSION
South Coast Area Office
200 Oceangate, Suite 1000
Long Beach, CA 90802-4302
(562) 590-5071

Th20b

Click here to go to original staff report

ADDENDUM

October 3, 2016

TO: Coastal Commissioners and Interested Parties

FROM: South Coast District Staff

SUBJECT: **COASTAL DEVELOPMENT PERMIT APPLICATION NO. 5-16-0632 (CITY OF SANTA MONICA & CALIFORNIA STATE PARKS) FOR THE COMMISSION MEETING OF THURSDAY, OCTOBER 6, 2016.**

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1. CHANGES TO STAFF REPORT

Due to inadvertent typographical errors, Commission staff recommends changes to the staff report dated September 16, 2016 in the following sections: Table of Contents, Section IV.C (Visual Resources) and Section IV.D (Hazards). Section Language to be added to the findings and conditions is shown in underlined text, and language to be deleted is identified by ~~strike-out~~.

Table of Contents on **Page 3,** make the following revisions**:**

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Header of Section IV.D (Hazards) on **Page 12,** make the following format change**:**

~~D.~~ C. HAZARDS

Conclusion paragraph of Hazards findings on **Page 15,** second sentence:

> In addition, **Special Condition ~~6~~ 5** requires compliance with the approved plans and all special conditions of the permit.

Header of Section IV.C (Visual Resources) on **Page 15,** make the following format change**:**

~~C.~~ D. VISUAL RESOURCES

CAPITOL OFFICE
STATE CAPITOL, ROOM 5108
SACRAMENTO, CA 95814
TEL (916) 651-4027
FAX (916) 651-4927

DISTRICT OFFICE
5016 N. PARKWAY CALABASAS
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CALABASAS, CA 91302
TEL (818) 876-3352
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California State Senate

SENATOR
FRAN PAVLEY
TWENTY-SEVENTH SENATE DISTRICT

COMMITTEES
NATURAL RESOURCES & WATER
CHAIR
BUDGET & FISCAL REVIEW
ENERGY, UTILITIES & COMMUNICATIONS
ENVIRONMENTAL QUALITY
GOVERNANCE & FINANCE

September 22, 2016

California Coastal Commission
South Coast Area Office
200 Oceangate, Suite 1000
Long Beach, CA 90802-4302

Subject: Support Letter for Santa Monica Beach Restoration Pilot Project

Dear California Coastal Commission:

As a State Senator who represented the City of Santa Monica for ten years, I strongly support The Bay Foundation (TBF) and the City of Santa Monica's "Santa Monica Beach Restoration Pilot Project", and recommend permitting for the project. As a former Coastal Commissioner, and current legislator who has authored several climate change-related policies, I fully understand the importance of increasing our coastal resilience to sea-level rise through the restoration of natural processes. This proposed project could serve as a low-impact demonstration project for coastal restoration and addressing sea-level rise both regionally and statewide.

Sandy beaches are one of the most vulnerable habitats to climate change, sea level rise, and erosion. At the same time, we depend on these habitats as one of the last forms of natural protection for coastal homes, roads, and infrastructure. In addition, active sediment transport and sand replenishment, daily mechanized maintenance, vehicular transport, and the removal of native vegetation have resulted in a destructive loss of the natural beach morphology in the Santa Monica Bay area.

The proposed project is a cost-effective restoration and research project designed to increase the beach's adaptive capacity to overcome climate change by reducing beach erosion and altering the beach profile in a 3-acre area. The area will be seeded and maintained to promote the growth of native beach flora, which should attract native fauna, thus increasing biodiversity. The site location minimizes impacts to recreation and current beach use, while maximizing the ecological benefits and supplemental educational benefits from the proximity to existing trail systems.

Restoring the natural processes of these impacted beach habitats through a cost-effective and low-impact project will improve natural functions and support a diverse native ecosystem that manages sand transport in a way that will increase coastal resiliency in the face of climate change. In addition, this demonstration project will provide an educational opportunity for recreational beach users and community groups to learn more about the vitality of these kinds of projects along our coast.

Please consider approving and moving forward with their Coastal Development Permit. This project provides an excellent opportunity to evaluate a low-impact pilot project.

Thank you for your consideration.

Sincerely,

Fran Pavley

Fran Pavley
California State Senator
District 27

Cc: Karina Johnston, Director of Watershed Programs, The Bay Foundation, via email

CALIFORNIA COASTAL COMMISSION
South Coast Area Office
200 Oceangate, Suite 1000
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Th20b

Filed:	08/17/2016
180th Day:	02/13/2017
Staff:	M. Alvarado
Staff Report:	09/16/2016
Hearing Date:	10/06/2016

STAFF REPORT: REGULAR CALENDAR

Application No.:	**5-16-0632**
Applicants:	**City of Santa Monica** and **California Department of Parks and Recreation**
Agent:	The Bay Foundation (Attn: Karina Johnston)
Project Location:	Three-acres of sandy Santa Monica State Beach, perpendicular to San Vicente Boulevard, and between Adelaide Drive and Georgina Avenue, Santa Monica, Los Angeles County. (Latitude: 34.024205 °; Longitude : -118.516220 °)
Project Description:	Transformation of approximately two (2) acres (of three-acre project site) of sandy beach into foredune habitat; the third acre is to remain as intertidal dry/wet sand. The proposed dune habitat measures approximately 541 ft. long and 164 ft. wide, and will have a path through the center allowing public access to the shoreline.
Staff Recommendation:	Approval with conditions

SUMMARY OF STAFF RECOMMENDATION

Commission staff is recommending conditional approval of the dune creation pilot project at Santa Monica State Beach in the City of Santa Monica in Los Angeles County. The recommended approval is limited to 5 years with conditions to address impacts to public access, hazards, biological resources, and visual resources.

The project site consists of three (3) acres of public sandy beach area. The City of Santa Monica and the California Department of Parks and Recreation, in partnership with The Bay Foundation, propose to transform approximately two (2) acres of existing sandy beach into foredune habitat. The proposed dune habitat creation area will generally consist of an approximately 164 ft. (50 m.) wide and 541 ft. (165 m.) long footprint and will extend seaward towards the intertidal sand area, adjacent to the ocean waterline. The remainder approximately one (1) acre of the project site will remain existing intertidal dry/wet sand and will be located seaward of the proposed dune habitat

area to provide a shore-side buffer. Similar to the dune area, this shore-side buffer will have an approximate 541 ft. (165 m.) length, but in contrast will have a width estimated to vary from 7 ft. (2 m.) to greater than 49 ft. (15 m.) depending on seasonal beach face slope variation and tidal influences. The applicants are proposing a passive dune creation pilot project that will not require deposition of sand or major site preparation. In the initial phase for implementation of the project, the following is required: installation of 3 ft. high fencing and hand-seeding of dune vegetation dispersed through hand-held seed spreaders followed by gentle raking in to minimize seed loss through wind-driven transport or birds. Two types of fencing are proposed. Three sides of the perimeter of the proposed dune area will consist of t-posts with sand fencing (pickets); the ocean-facing perimeter will remain open to allow public access to beach recreational users. An approximately 5 ft. wide and 164 ft. long sandy trail is proposed through the center of the project site, which will extend from the apex (landward) to the toe (seaward) of the proposed dune area to allow the public to traverse the project site for vertical access to the shoreline. To accommodate this trail, a 3 ft. high post and rope fence will be installed vertically through the middle of the project site.

The project site encompasses 3-acres of the sandy beach at the north (upcoast) end of Santa Monica State Beach ("Beach") in Santa Monica, Los Angeles County. The subject site is located between the first public road and the sea, and is west (seaward) and perpendicular to San Vicente Boulevard and between Adelaide Drive and Georgina Avenue. The property is managed by the City of Santa Monica (applicant) and owned by the California Department of Parks and Recreation (co-applicant).

The proposed project is intended to address coastal hazard risks while protecting and enhancing other coastal resources, including public beach access and recreation, natural shoreline habitat, and aesthetic values.

The proposed project raises potential concerns with the Coastal Act's public access and recreation policies. The proposed dune creation will result in the occupation of sandy beach currently available for recreation. In addition, it has the potential to impact public access by blocking lateral public access along the shoreline. However, as designed and situated, the proposed project will continue to allow public beach access and recreation around and through the site, and although public access in the dune area is discouraged, public access will not be prohibited.

Staff is recommending conditions to address the impacts of the proposed project. Staff recommends the following **five (5) Special Conditions**: **1)** an assumption of risk, waiver of liability and indemnity; **2)** limited development authorization period; **3)** dune habitat creation plan; **4)** public access requirements; and **5)** permit compliance.

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APPENDICES

Appendix A - Substantive File Documents

EXHIBITS

Exhibit 1 – Project Location
Exhibit 2 – Site Plan
Exhibit 3 – Project Renderings
Exhibit 4 – Letters of Support

I. MOTION AND RESOLUTION

Motion:

*I move that the Commission **approve** Coastal Development Permit No. 5-16-0632 pursuant to the staff recommendation.*

Staff recommends a **YES** vote. Passage of this motion will result in approval of the permit as conditioned and adoption of the following resolution and findings. The motion passes only by affirmative vote of a majority of the Commissioners present.

Resolution:

The Commission hereby approves a coastal development permit for the proposed development and adopts the findings set forth below on grounds that the development as conditioned will be in conformity with the policies of Chapter 3 of the Coastal Act and will not prejudice the ability of the local government having jurisdiction over the area to prepare a Local Coastal Program conforming to the provisions of Chapter 3. Approval of the permit complies with the California Environmental Quality Act because either 1) feasible mitigation measures and/or alternatives have been incorporated to substantially lessen any significant adverse effects of the development on the environment, or 2) there are no further feasible mitigation measures or alternatives that would substantially lessen any significant adverse impacts of the development on the environment.

II. STANDARD CONDITIONS:

This permit is granted subject to the following standard conditions:

1. **Notice of Receipt and Acknowledgment**. The permit is not valid and development shall not commence until a copy of the permit, signed by the permittee or authorized agent, acknowledging receipt of the permit and acceptance of the terms and conditions, is returned to the Commission office.

2. **Expiration.** If development has not commenced, the permit will expire two years from the date on which the Commission voted on the application. Development shall be pursued in a diligent manner and completed in a reasonable period of time. Application for extension of the permit must be made prior to the expiration date.

3. **Interpretation.** Any questions of intent of interpretation of any condition will be resolved by the Executive Director or the Commission.

4. **Assignment.** The permit may be assigned to any qualified person, provided assignee files with the Commission an affidavit accepting all terms and conditions of the permit.

5. **Terms and Conditions Run with the Land.** These terms and conditions shall be perpetual, and it is the intention of the Commission and the permittee to bind all future owners and possessors of the subject property to the terms and conditions.

III. SPECIAL CONDITIONS:

This permit is granted subject to the following special conditions:

1. **Assumption of Risk, Waiver of Liability and Indemnity.**
   A. By acceptance of this permit, the applicants acknowledge and agree (i) that the site may be subject to hazards from flooding, sea level rise, erosion and wave uprush; (ii) to assume the risks to the applicants and the property that is the subject of this permit of injury and damage from such hazards in connection with this permitted development; (iii) to unconditionally waive any claim of damage or liability against the Commission, its officers, agents, and employees for injury or damage from such hazards; and (iv) to indemnify and hold harmless the Commission, its officers, agents, and employees with respect to the Commission's approval of the project against any and all liability, claims, demands, damages, costs (including costs and fees incurred in defense of such claims), expenses, and amounts paid in settlement arising from any injury or damage due to such hazards.
   B. PRIOR TO ISSUANCE OF COASTAL DEVELOPMENT PERMIT, the applicants shall submit a written agreement, in a form and content acceptable to the Executive Director, incorporating all of the above terms of this condition.

2. **Development Authorization Period.** This CDP authorizes the approved development on a temporary basis for a period of five (5) years from the date of Commission action (i.e., until October 6, 2021). After such time, the authorization for continuation and/or retention of the approved fencing, signage, and active management of the dune habitat shall cease, unless the applicants submit an amendment to this permit, or new Coastal Development Permit application to the Commission, and that amendment or permit is approved, thereby extending the time period for the development. The dune habitat created pursuant to this permit may remain in place.

3. **Dune Habitat Creation Plan.** PRIOR TO ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT, the applicants shall submit, for the review and written approval of the Executive Director, a landscaping plan prepared by a qualified biologist or licensed landscape architect and a public access fencing and signage plan. The plans shall include the following:

   A. **Dune Habitat Area Footprint.** The dune habitat creation area shall generally include a 164 ft. (50 m.) wide and 541 ft. (165 m.) long footprint and shall be located such that a shore-side buffer area of sandy beach is maintained consistent with **Special Condition 4** to allow for lateral public access between the maximum seaward limit of the dune habitat and the shoreline.

   B. **Dune Planting.** The dune habitat creation plan shall include a planting plan using native coastal strand and southern foredune plant species (plant palette) including source of

plant material and plant installation methods. The plant palette shall be made up exclusively of native plants appropriate to the habitats and region, grown from seeds or vegetative materials obtained from the site or from an appropriate nearby beach location to maintain the genetic integrity of the area. No horticultural varieties, and no coastal bluff or back dune species shall be used (e.g. *Artemisia californica, Ericameria ericoides, Eriogonum parvifolium, Perritoma arborea, Rhus intergrifolia*). The plan shall also include an exhibit that shows the planned locations, numbers, and spacing of the individual plant species, i.e. that depicts their distribution and abundance across the dune area.

C. **Sand Fencing.** Discontinuous sand fencing shall be temporarily employed to facilitate establishment of dune hummocks. No sand fencing shall be installed on the seaward perimeter of the dune area. In addition to sand fencing, the design shall include strategic placement of native dune vegetation for dune hummock establishment. Temporary sand fencing and strategic planting, rather than mechanized equipment, shall be employed to establish a natural pattern of dune hummocks. The sand fencing shall be no more than 36 inches in height and designed to be removable in the event of wave uprush.

A. **Post and Rope Fencing.** Discontinuous post and rope fencing shall be installed through the center of the project site to accommodate an approximately 5 ft. wide and 164 ft. long sandy trail to provide vertical public access to the shore. The post and rope fence shall be no more than 36 inches in height and designed to be removable in the event of wave uprush.

B. **Signage.** The plan shall include the provision for the installation of signage to be incorporated into the design of the fencing adequate to inform the public of their right to utilize all public access areas on site (including the vertical sandy trail through the center of the habitat area and the lateral portion of the sandy beach between the mean high tide line and the ambulatory beach area at the seaward most limit of the dune habitat area) and generally describing the approved project, including identification of the dune site as a sensitive dune habitat. The signage shall blend in with the surrounding natural environment and not detract from the character of the area. Signs that become subject to erosion or otherwise become unsightly shall be relocated or replaced. The plan shall show the location, size, design, and content of all signs. The signs shall be no larger than 24 inches x 36 inches. No signs shall be posted on the sandy beach unless specifically authorized by the approved signage plan, a separate coastal development permit, or an amendment to this coastal permit, unless the Executive Director determines that no permit or amendment is required. The signs may indicate that the areas within the project site are sensitive dune habitat. In no instance shall signs be posted prohibiting public coastal access.

D. **Maintenance.** The plan shall include provisions for on-going maintenance and/or management of the dune habitat – beach enhancement area for the term of this coastal development permit, including procedures for removing and relocating the fencing and signage during predicted storm events that may threaten the integrity of the fence or create a potential public safety hazard.

4. Public Access. The shore-side buffer area of sandy beach, providing public lateral access, shall extend seaward from the seaward most limit of dune vegetation to the maximum wave

uprush limit. Public lateral access and passive recreational use over the entirety of the area running parallel to the shore and extending landward from the ambulatory mean high tide line shall be maintained by the landward re-location of existing vertical sand fencing and post-and-rope fencing on the upcoast and downcoast sides of the proposed foredune habitat area if the beach area seaward of the first line of dune vegetation is impassible due to consistent high tides, formation of a steep scarp, or some other reason, in which case the public shall be able to pass and repass along the toe of the seaward most dune formation.

5. **Permit Compliance**. All development must occur in strict compliance with the proposal as set forth in the application, subject to any special conditions imposed herein. Any deviation from the approved plans must be submitted for review by the Executive Director to determine whether an amendment to this Coastal Development Permit No. 5-16-0632 is necessary pursuant to the requirements of the Coastal Act and the California Code of Regulations.

IV. FINDINGS AND DECLARATIONS:

A. PROJECT DESCRIPTION & LOCATION

The project site consists of three (3) acres of public sandy beach area (**Exhibits 2**). The applicants are proposing to transform approximately two (2) acres of existing sandy beach into foredune habitat. The proposed dune habitat creation area will generally consist of an approximately 164 ft. (50 m.) wide and 541 ft. (165 m.) long footprint and will extend seaward towards the ocean waterline (**Exhibits 2-3**). The remainder approximately one (1) acre of the project site will remain existing intertidal dry/wet sand and will be located seaward of the proposed dune habitat area to provide a shore-side buffer, allowing for seaward lateral public access. Similar to the dune area, this shore-side buffer will have a length of approximately 541 ft. (165 m.), but in contrast will have a width estimated to vary from 7 ft. (2 m.) to greater than 49 ft. (15 m.) depending on seasonal beach face slope variation and tidal influences (**Exhibit 2-3**).

The initial phase for the implementation of this project is anticipated to take about 3-4 weeks, followed by monitoring and maintenance for 10 years by the applicants. Small plant hummocks are anticipated to form naturally over time, if dune vegetation successfully establishes, and are expected to reach a maximum height of 1-3 ft. Although the maintenance is expected to continue for 10 years, this permit term is limited to 5 years in order to provide an opportunity for any necessary mid-course corrections and for re-evaluation of the project to ensure compliance with the Chapter 3 policies of the Coastal Act.

The applicants are proposing a passive dune that will not require deposition of sand or major site preparation. For implementation of the project the following is required: installation of 3 ft. high fencing and hand-seeding of dune vegetation dispersed through hand-held seed spreaders followed by gentle raking in to minimize seed loss through wind-driven transport or birds. Two types of fencing are proposed. Three sides of the perimeter of the proposed dune area will consist of t-posts with 3 ft. high sand fencing; the ocean-facing perimeter will remain open to allow access to beach recreational users (**Exhibit 3**). The sand fencing is necessary to allow the dunes and plants to establish, as well as to delineate the dune habitat site. An approximately 5 ft. wide and 164 ft. long sandy vertical trail is proposed through the center of the project site, which will extend from the

apex (landward) to the toe (seaward) of the proposed dune area to allow the public a way to traverse the project site for vertical access to the shoreline. To accommodate this trail, a 3 ft. high post and rope fence will be installed in the middle of the project site (**Exhibit 3**). Fencing will not be installed on the shoreline perimeter of the dune area to allow birds, other wildlife, and the public to enter the project site. Education and interpretive signage will be attached to the fence posts around the perimeter of the site, but no stand-alone signs are proposed.

The proposed plant palette will consist solely of the following native dune plant species: beach evening primrose (*Camissoniopsis cheiranthifolia*), sand verbena (*Abronia maritima*), beach bur sage (*Ambrosia chamissonis*), and sea scale (*Atriplex leucophylla*). Irrigation is not proposed. Seeding will occur within the fall/winter season to allow for natural germination and establishment during the winter rains.

The project site encompasses 3-acres of the sandy beach at the upcoast (northwest) end of Santa Monica State Beach ("Beach") in Santa Monica, Los Angeles County. The subject site is located between the first public road (Pacific Coast Highway) and the sea, and is perpendicular to San Vicente Boulevard, and between Adelaide Drive and Georgina Avenue. The subject site's length stretches parallel to the landward (northeast) public bicycle path (Ocean Front Walk), located approximately 98 ft. (30 m.) from the landward edge of the project site, and to Pacific Coast Highway (**Exhibit 1**). The surrounding area immediately adjacent to the proposed project footprint includes upper sandy beach and intertidal sandy beach, and the bicycle path to the north. The proposed project site is approximately 1,640 feet (500 m.) northwest of the temporary western snowy plover (*Charadrius alexandrines nivosus*) enclosure. The project site is also seaward of and stretches downcoast from the southern half of the Beach Club to the northern boundary of the Palisades Beach Club. The property is managed by the City of Santa Monica and owned by the California Department of Parks and Recreation (co-applicant).

The proposed project is described as a habitat "creation" project rather than a "restoration" project because historically Santa Monica State Beach has been replenished by dredged sand. Therefore, the proposed project site is potentially on an artificially filled sandy beach, and not a historically naturally occurring sandy beach or dune formation.

The South Coast District office received letters from public agencies and environmental organizations in support of the proposed project (letters attached; see **Exhibit 4**).

B. PUBLIC ACCESS

Section 30210 of the Coastal Act states:

> *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.*

Section 30211 of the Coastal Act states:

> *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.*

Section 30212(a) of the Coastal Act states:

> *Public access from the nearest public roadway to the shoreline and along the coast shall be provided in new development projects except where: (1) it is inconsistent with public safety, military security needs, or the protection of fragile coastal resources, (2) adequate access exists nearby, or, (3) agriculture would be adversely affected. Dedicated accessway shall not be required to be opened to public use until a public agency or private association agrees to accept responsibility for maintenance and liability of the accessway.*

Section 30213 of the Coastal Act states:

> *Lower cost visitor and recreational facilities shall be protected, encouraged, and, where feasible, provided. Developments providing public recreational opportunities are preferred.*

The proposed project site is located on a generally 400-foot wide beach within the far north beach area in Santa Monica State Beach ("SMS Beach") and is located seaward of the existing lateral public bicycle path (Ocean Front Walk), which runs the length of the beach (**Exhibit 2)**. The SMS Beach and Santa Monica Pier ("Pier") are very popular and heavily used. Ocean Front Walk is also very popular and in this area provides bicyclist access along the beach.

The proposed dune habitat area will be immediately bounded by sandy beach, the sea, the public concrete bicycle path on the landward side, and a lifeguard station on the downcoast side approximately 13 ft. downcoast from the project site (**see Exhibit 2**).

The applicants propose to transform approximately two (2) acres of existing sandy beach into foredune habitat. The proposed dune habitat area on-site will generally consist of an approximately 164 ft. (50 m.) wide and 541 ft. (165 m.) long footprint and will extend seaward towards the intertidal waterline. The remainder approximately one (1) acre of the project site will remain an existing intertidal dry/wet sand and will be located seaward of the proposed dune habitat area to provide a shore-side buffer to allow for lateral public access along the shore. Similar to the dune area, this shore-side buffer will have a length of approximately 541 ft. (165 m.), but in contrast will have a width estimated to vary from 7 ft. (2 m.) to greater than 49 ft. (15 m.) depending on seasonal beach face slope variation and tidal influences. In addition, an approximately 5 ft. wide and 164 ft. long sandy trail is proposed through the center of the project site, which will extend from the apex (landward) to the toe (seaward) of the proposed dune area to allow the vertical access to the shoreline.

The proposed development is multi-purpose and has multiple metrics. The proposed project is a pilot project that involves the transformation of a portion of the current beach into a living shoreline with a coastal plant and wildlife community that can be resilient to sea level rise to evaluate the effectiveness of "soft" natural shore protection against impacts from sea-level-rise and storms while providing public benefits and enhancement of natural resources. Data will be collected on physical characteristics like topographic changes in beach slope, shoreline, and dune formation. The Commission finds that the proposed project is, in part, an experimental effort to create a buffer on the sandy beach within the project reach to study the project's effectiveness in reducing the potential for periodic wave-caused erosion to upland areas of the site while maintaining public coastal access and recreational opportunities.

SMS Beach is located in a region that is highly desirable for public recreational opportunities, for residents and visitors alike. The beach areas closer to the Pier tend to be more heavily used by the public. The proposed project site is located on the north end area of SMS Beach, approximately 1.44 miles upcoast from the Pier. Recreational use of the site consists primarily of passive recreational uses such as walking, bird watching, jogging, picnicking, sun bathing, and dog walking, as well as swimming, surfing, paddle boarding, and tide pooling.

Because the proposed dune habitat (2 acres dune footprint) will occupy beach area, the project will directly impact public coastal access and recreational use areas. However, the project site was specifically selected on the upcoast section of SMS Beach and in close proximity to the water for various reasons. The project site is located at the upcoast end of the City-managed SMS Beach, adjacent to the county line (representative by white dashed line on **Exhibit 2**) that delineates the beach property of SMS Beach that the City manages and the Los Angeles County beach jurisdictional area of the neighboring Los Angeles County Will Rogers State Beach Park. This beach area is not used as heavily as the beach areas closer to the Pier, and this may be primarily because the site is located in a section of the beach that does not have public parking or restroom facilities. Parking is available approximately 800 ft. north and 1,300 ft. east of the project site along Pacific Coast Highway. The nearest public restrooms are located approximately 730 ft. from the project site at the Annenberg Community Beach House to the east.

As for the dune site's close proximity to the ocean waterline, the location of the proposed dune area on the shoreline can directly affect how much sand is available for passive public beach access uses. Changes in the shoreline profile can result in a reduced beach width between the toe of the dune site and the water, and alter the recreational usable area if it is not available during high tide and severe storm events or even potentially throughout the winter season. The mean high tide line is the intersection of the elevation of mean high tide with the shore profile. Where the shore is composed of sandy beach whose profile changes as a result of wave action, the location at which the elevation of mean high tide line intersects the shore is subject to change. The result is that the mean high tide line is an "ambulatory" or moving line that moves seaward through the process known as accretion and landward through the process known as erosion. Consequently, the position of the mean high tide line fluctuates seasonally as high wave energy (usually but not necessarily) in the winter months causes the mean high tide line to move landward through erosion, and as milder wave conditions (generally associated with the summer) cause the mean high tide line to move seaward through accretion. In addition to ordinary seasonal changes, the location of the mean high tide line is affected by long term changes such as sea level rise and diminution of sand supply.

The applicants maintain that the site's proximity to the ocean is an integral part of the pilot project, and re-locating the project site further landward would undermine the success of the proposed project. The pilot project is experimental in nature. The dunes are being proposed next to the water for scientific research. This project will allow for a thorough scientific evaluation of the dune habitat's ability to help form a natural buffer that can offer protection against sea level rise, storm impacts, and wave erosion, potentially providing a model against climate change impacts.

As previously mentioned, to preserve recreational usable beach area on the seaward side of the dune habitat area, a shore-side buffer is being proposed. This shore-side buffer will have an approximate length of 541 ft. (165 m.). Its width is estimated to vary from 7 ft. (2 m.) to greater than 49 ft. (15 m.) depending on seasonal beach face slope variation and tidal influences. The applicants assert that this buffer is anticipated to allow plenty of room for both seasonal beach changes and public access on dry sand. Moreover, the site will be continually monitored, and, if necessary, the adjustment of shoreline fence posts to maintain the minimum dry sand buffer is being proposed.

For all of the reasons discussed above, the Commission finds it necessary to require **Special Condition 4**, which requires the applicants to adjust the vertical fencing if the beach area seaward of the first line of dune vegetation is impassible due to high tides, so that the public is able to pass and repass along the seaward most dune formation. Public access and recreation shall be allowed within the dune seaward edge if the public access and passive recreational use area within the shore-side buffer is no longer available due to an advancing mean high tide line. It is recognized that both the mean high tide line and the seaward limit of the dune vegetation are ambulatory in nature and that, therefore, the area of beach that is available for lateral public access will also be ambulatory in nature. Moreover, **Special Condition 2** limits the permit length to five (5) years, to allow for re-evaluation of the dune site at that time to avoid adverse impacts to public beach access.

The proposed project location will also assist in the ability for the project area to retain sand and build small hummocks through both Aeolian transport, and sand transport from offshore with upwelling. Allowing the dunes to form through a more passive, natural process following the initial implementation is significant for a more accurate scientific evaluation. Additional ecological reasons for the proposed project site includes potential wildlife usage (e.g. shorebirds). For instance, the dune site is approximately 1,640 ft. upcoast of the temporary western snowy plover (*Charadrius alexandrines nivosus*) enclosure with a fence that is deployed and removed for a portion of every year. The plovers that occur at the enclosure may potentially use the project habitat area once it becomes established, although this speculation remains uncertain. In addition, the dune area near the ocean will help retain kelp wrack that washes ashore, which will benefit invertebrates and foraging birds.

The applicants have also indicated that the dune site cannot be relocated further landward closer to Ocean Front Walk (bicycle path) as it may preclude the possible expansion/widening of this bicycle path in the near future to accommodate a separate pedestrian path. This section of the beach currently does not have a separate pedestrian walkway. Consequently, pedestrians are walking along the bike path creating a conflict. Therefore, the applicants are providing an approximately 100 ft. (30 m.) buffer between the landward edge of the dune and Ocean Front Walk so as to not preclude possible improvements to Ocean Front Walk in the near future. Any such improvements would require a coastal development permit or other appropriate authorization from the Commission.

To further preserve recreational usable beach area and in response to public comment, a sandy trail is being proposed through the center of the project site to provide the public a way to traverse the project site, providing vertical access to the shoreline. The sandy trail will be approximately 5 ft. wide and 164 ft. long, which will be delineated from the dune area with a discontinuous 3 ft. high post and rope fence. With the trail, the proposed project can promote eco-tourism based on environmental values through unique aesthetics and may enhance the public's interaction with wildlife (e.g. bird watching).

Finally, although the proposed project will take up sandy beach area, the beach is very broad and the proposed dune habitat will not adversely impact beachgoers' use of the beach. All areas around the dune site will remain accessible to the public. The area between the dune site and the water can still be used, as well as the sandy beach areas on the upcoast and downcoast sides of the site, and between the landward margin of the dune site and the bike path. Additionally, although sand fencing and signs may cause people to avoid sensitive dune formation areas, these areas will not be closed to the public.

Moreover, a potential positive effect of the project on access is the deceleration and decrease of erosion on the adjacent public beach areas by providing a buffer to help dissipate the wave energy. However, the effect may not become clear for some time after the project is implemented. What is believed is that the proposed dune will continue to allow natural nourishment and maintenance of the shoreline and public beach area. Coastal dunes exist in conjunction with the beach and are part of the sand sharing system that actively exchanges sand between the dune, beach, and the offshore bars.

In order to provide the public with clarity regarding areas that are available for public access, **Special Condition 3** requires a Public Access Fencing and Signage Plan that includes the provision for the installation of signage to inform the public of their right to utilize all public access areas on site but may identify that the areas of the dune site are sensitive dune habitat. The plan shall show the location, size, design, and content of all signs. No signs that restrict public access to the public beach shall be permitted.

In conclusion, with Special Conditions addressing adverse impacts to public access and recreation, impacts to the public will be minimized to the greatest extent feasible. In addition, the Commission imposes **Special Condition 5** requiring compliance with the approved plans and all special conditions of the permit. Thus, as conditioned, the Commission finds the project consistent with the public access and recreation policies of the Coastal Act.

D. HAZARDS

Section 30253 of the Coastal Act states, in relevant part:

> *New development shall:*
>
> *(a) Minimize risks to life and property in areas of high geologic, flood, and fire hazard.*

> *(b) Assure stability and structural integrity, and neither create nor contribute significantly to erosion, geologic instability, or destruction of the site or surrounding area or in any way require the construction of protective devices that would substantially alter natural landforms along bluffs and cliffs.*

Section 30251 of the Coastal Act states that:

> *The scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance. Permitted development shall be sited and designed to protect views to and along the ocean and scenic coastal areas, to minimize the alteration of natural land forms, to be visually compatible with the character of surrounding areas, and, where feasible, to restore and enhance visual quality in visually degraded areas. New development in highly scenic areas such as those designated in the California Coastline Preservation and Recreation Plan prepared by the Department of Parks and Recreation and by local government shall be subordinate to the character of its setting.*

The proposed project site is located on a sandy beach within the Santa Monica State Beach ("SMS Beach"), adjacent to the jurisdictional boundary of Los Angeles County's Will Rogers State Beach. The applicants are proposing a pilot project that includes the creation of two (2) acres of foredune habitat on the public sandy beach. The proposed dune habitat area on-site will generally consist of an approximately 164 ft. (50 m.) wide and 541 ft. (165 m.) long footprint and will extend seaward towards the intertidal waterline. Between the dune habitat area and the ocean water, a shore-side buffer consisting of intertidal dry/wet sand is proposed to remain with a length of approximately 541 ft. (165 m.) and a width that will vary from approximately 7 ft. (2 m.) to greater than 49 ft. (15 m.) depending on seasonal beach face slope variation and tidal influences.

Because the project site is immediately adjacent to intertidally wetted sand, it is apparent that a wide sandy beach will not afford the proposed dune habitat protection from wave and flooding hazards. Consequently, projected sea level rise, and a series of significant storms or an El Nino year have the potential to degrade the proposed dune habitat.

For instance, sea level has been rising slightly for many years. In the Santa Monica Bay area, the historic rate of sea level rise, based on tide gauge records, has been 1.8 mm/yr. or about 7 inches per century[1]. Recent satellite measurements have detected global sea level rise from 1993 to present of 3 mm/yr. or a significant increase above the historic trend observed from tide gauges. Recent observations of sea level along parts of the California coast have shown some anomalous trends, however; there is a growing body of evidence that there has been a slight increase in global temperature and that an accelerated rate of sea level rise can be expected to accompany this increase in temperature. Sea level rise is expected to increase significantly throughout the 21st century and some coastal experts have indicated that sea level rise of 3 to 5 feet or more could occur by the year

[1] Lyles, S.D., L.E. Hickman and H.A. Debaugh (1988) *Sea Level Variations for the United States 1855 – 1986*. Rockville, MD: National Ocean Service.

2100.[2] Mean water level affects shoreline erosion in several ways and an increase in the average sea level will exacerbate all these conditions.

On the California coast the effect of a rise in sea level will be the landward migration of the intersection of the ocean with the shore. On a relatively flat beach, with a slope of 40:1, a simple geometric model of the coast indicated that every centimeter of sea level rise will result in a 40-centimeter landward movement of the ocean/beach interface. Accompanying this rise in sea level will be increased wave heights and wave energy. Along much of the California coast, the bottom depth controls the nearshore wave heights, with bigger waves occurring in deeper water. Since wave energy increases with the square of the wave height, a small increase in wave height can cause a significant increase in wave energy and wave damage.

It should be noted, however, that the applicants are aware of the potential coastal hazard risks associated with the proposed project location. In fact, the dune site is intentionally being situated adjacent to the waterline because this location is an integral part of the pilot project, as described in more detail in Section IV.B of this staff report. The pilot project is experimental in nature. This project will allow for a thorough scientific evaluation of the dune habitat's ability to help form a natural buffer that can offer protection from sea level rise, storm impacts, and wave erosion, potentially providing a model against climate change impacts.

In addition, the pilot is intended to study alternatives to the "hard" and permanent armoring of the coast. "Hard" protective devices (i.e. seawalls, revetments, cliff retaining walls, groins and other such structures) designed to forestall erosion alter natural landforms and natural shoreline processes. The Coastal Act limits construction of these devices because they have a variety of negative impacts on coastal resources including adverse effects on sand supply, public access, coastal views, natural landforms, and overall shoreline beach dynamics on and off site, ultimately resulting in the loss of beach. Through this pilot project, the effectiveness of "soft" shore protection from sea-level-rise, that can also offer public benefits and enhancement of natural resources, will be evaluated. Data will be collected by the applicants on physical characteristics like topographic changes in beach slope, shoreline, and dune formation. Therefore, locating the dune habitat further landward could undermine the success of the project. The site conditions are also optimal because it can offer a side-by-side comparison of the resulting effects of wave up rush and flooding on the project area versus the surrounding sandy beach areas.

The Commission notes that evidence exists that the project site is subject to potential risk. The applicants propose to maintain and monitor the project site for 10 years. Although the maintenance is expected to continue for 10 years, this permit term is limited to 5 years under **Special Condition 2** to provide an opportunity for any necessary mid-course corrections and for re-evaluation of the project to ensure compliance with the Chapter 3 policies of the Coastal Act. For instance, the applicants have indicated that in the event that the dune habitat is wiped out by coastal hazards, remediation measures would be considered subsequent to a re-evaluation of the project. Remediation measures would be similar to the initial phase currently proposed (i.e. hand-seeding);

[2] Cayan, D.R., M. Tyree, M. Dettinger, H. Hidalgo, T. Das, E. Maurer, P. Bromirski, N. Graham, and R.E. Flick, 2009. *Climate Change Scenarios and Sea Level Estimates for the California 2008 Climate Change Scenarios Assessment*, Draft Paper, CEC-500-2009-014-D, 62 pp, http://www.energy.ca.gov/2009publications/CEC-500-2009-014/CEC-500-2009-014-D.pdf.

sand fence would be re-established (or fixed). Nevertheless, the applicants' intended goal is to study the project site over time and how natural effects affect it.

Given that the applicants have chosen to implement the project despite potential risks from wave attack, erosion, sea level rise, or flooding, the applicant must assume the risks. Therefore, **Special Condition 1** requires the applicants to waive any claim of liability against the Commission for damage to life or property.

Conclusion
To ensure that the proposed project is consistent with Sections 30251 and 30253 of the Coastal Act, and to ensure that the proposed project does not result in future adverse effects to coastal processes, the Commission imposes **Special Conditions 1 & 2**. In addition **Special Condition 6** requires compliance with the approved plans and all special conditions of the permit. As conditioned, the Commission finds that the proposed project is consistent with Coastal Act Sections 30251 and 30253.

C. VISUAL RESOURCES

Section 30251 of the Coastal Act states, in relevant part:

> *The scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance. Permitted development shall be sited and designed to protect views to and along the ocean and scenic coastal areas, to minimize the alteration of natural land forms, to be visually compatible with the character of surrounding areas, and, where feasible, to restore and enhance visual quality in visually degraded areas…*

Major scenic resources in the City of Santa Monica are identified in the City's Local Coastal Land Use Plan and the City's Scenic Corridor Element. Scenic resources include the coastline, beach and bay, natural habitat areas, the Santa Monica Pier, Pacific Palisades bluff, and the Santa Monica Mountains and canyons. The project site is located on the beach, and the area provides beachgoers, pedestrians, and bicyclists views of these scenic resources. Viewpoints from the surrounding area include the beach, the bike path on the beach, the ocean, bluffs and landward development. From inland streets, such as portions of Adelaide Drive, San Vicente Boulevard and Georgina Avenue, the coastline and the ocean horizon are visible.

The applicants are proposing a passive dune creation project pilot. For implementation of the project, two types of fencing are being proposed. Three sides of the perimeter of the proposed dune area will consist of t-posts with 3 ft. high sand-fencing, the ocean-facing perimeter will remain open to allow access to beach recreational users. The sand fencing is necessary to allow germination and the dunes to establish, as well as to delineate the dune habitat site. In addition, an approximately 5 ft. wide and 164 ft. long sandy trail is proposed through the center of the project site, which will extend from the apex (landward) to the toe (seaward) of the proposed dune area to allow the public to traverse the project site for vertical access to the shoreline. To accommodate this trail, a 3 ft. high post and rope fence will be installed in the middle of the project site. Education and interpretive signage will be installed on the fence posts around the perimeter of the site.

As seen from the Ocean Front Walk bike path and the beach, views of the ocean could be partially obstructed by the fencing. As designed, however, with a maximum 3 ft. height and a small footprint, view obstruction of the beach and ocean due to the proposed fencing will be minimal. In addition, the two fence types are visually permeable and will not result in significant obstruction of ocean views. The applicants have indicated that the sand fencing is necessary for implementation of the project but can be removed once the dunes have established and become self-sustaining. **Special Condition 2** requires that prior to the date that authorization for the development expires (5 years from the date of Commission action), the applicants or successor in interest shall submit a complete coastal development permit application or permit amendment application for the re-authorization of the dune creation pilot project for an additional five (5) year term. This will give the Commission an opportunity to revisit the project and re-evaluate the visual impacts of the sand fencing needed to establish the dune habitat.

As part of this pilot project, small plant hummocks are anticipated to form naturally over time, if dune vegetation successfully establishes, and are expected to reach a maximum height of 1-3 ft. The dune hummocks are not anticipated to significantly obstruct views of the ocean water. In addition, the City of Santa Monica has identified natural habitat areas as scenic resource in the City's Local Coastal Land Use Plan and the City's Scenic Corridor Element. Therefore, the dune hummocks will enhance and contribute to coastal visual resources.

The Commission finds the proposed project will not interfere with and will maintain the public coastal views. As conditioned, the Commission finds the proposed project will not have a significant impact on visual resources and is consistent with the relevant policies of the City's Local Coastal Land Use Plan and with Section 30251 of the Coastal Act.
Section 30251 of the Coastal Act states, in relevant part:

E. BIOLOGICAL ASSESSMENT

Section 30230 of the Coastal Act states:

> *Marine resources shall be maintained, enhanced, and where feasible, restored. Special protection shall be given to areas and species of special biological or economic significance. Uses of the marine environment shall be carried out in a manner that will sustain the biological productivity of coastal waters and that will maintain healthy populations of all species of marine organisms adequate for long-term commercial, recreational, scientific, and educational purposes.*

Section 30231 of the Coastal Act states that:

> *The biological productivity and the quality of coastal waters, streams, wetlands, estuaries, and lakes appropriate to maintain optimum populations of marine organisms and for the protection of human health shall be maintained and, where feasible, restored through, among other means, minimizing adverse effects of waste water discharges- and entrainment, controlling runoff, preventing depletion of ground water supplies and substantial interference with surface water flow, encouraging waste water reclamation, maintaining*

natural vegetation buffer areas that protect riparian habitats, and minimizing alteration of natural streams.

Section 30240 of the Coastal Act states:

(a) Environmentally sensitive habitat areas shall be protected against any significant disruption of habitat values, and only uses dependent on those resources shall be allowed within those areas.

(b) Development in areas adjacent to environmentally sensitive habitat areas and parks and recreation areas shall be sited and designed to prevent impacts which would significantly degrade those areas, and shall be compatible with the continuance of those habitat and recreation areas.

The Coastal Act policies identified above require the protection of marine resources.

The applicants propose to create 2-acres of dune habitat on the beach. The dune habitat area will extend approximately 541 ft. laterally along the beach and 164 ft. towards the shoreline. The proposed plant palette will consist solely of the following native dune plant species: beach evening primrose (*Camissoniopsis cheiranthifolia*), sand verbena (*Abronia maritima*), beach bur sage (*Ambrosia chamissonis*), and sea scale (*Atriplex leucophylla*). Irrigation is not proposed.

The applicants are proposing a passive dune creation project pilot that will not require deposition of sand or major site preparation. In the initial phase for the implementation of the project, the installation of sand fencing is proposed followed by hand-seeding of dune vegetation dispersed through hand-held seed spreaders followed by gentle raking in to minimize seed loss through wind-driven transport or birds. The Commission imposes **Special Condition 3** to ensure that the plant palette shall be made up exclusively of coastal strand and southern foredune plant species. Discontinuous sand fencing shall be temporarily employed to facilitate establishment of dune hummocks. Temporary sand fencing and strategic planting, rather than mechanized equipment, shall be employed to establish a natural pattern of dune hummocks.

There are currently no vegetated sand dunes along the Santa Monica coastline. The Commission notes that southern foredune communities, as those found in Broad Beach, are listed as "very threatened" by the State of California. The Broad Beach dunes are remnants of a more widespread system that historically occurred along parts of Southern California. California dune ecosystems have suffered a disproportionately high amount of human impact because the coast is a highly desirable area for residential settlements, industry, tourism, and recreation. As such, undisturbed coastal dunes are becoming increasingly more rare in California.

The proposed project involves the passive creation of a foredune habitat community that, once established, can support an array of native plants and animals uniquely adapted to this transition zone between land and sea. The proposed project will not result in significant adverse impacts to marine resources. As proposed and conditioned, marine resources will be maintained, enhanced or restored, consistent with Section 30230 of the Coastal Act.

There is a potential for grunion runs during the course of the implementation of the project. The California grunion is a small fish in the silversides family and is extremely unusual among fish in its spawning behavior. The grunion spawn on the sandy beaches in the project vicinity immediately following high tides from March to August. The eggs are incubated in the sand until the following series of high tide conditions, approximately 10 to 15 days, when the eggs hatch and are washed into the sea. California grunion is a species of concern due to its unique spawning behavior.

The Commission notes that any disturbance on the sandy beach may result in adverse effects to grunion, as well as indirect impacts from smothering or raking of eggs previously deposited on the sandy beach. However, the initial phase for implementation of the project is not proposed to occur within the seasonally predicted run period and egg incubation period of the California grunion (between March 1st and August 31st). Seeding and implementation will occur within the fall/winter season to allow for natural germination and establishment during the winter rains. Therefore, the proposed project is not anticipated to adversely affect the California grunion.

In addition, the proposed project site is approximately 1,640 feet (500 m.) northwest of the Commission-approved temporary western snowy plover (*Charadrius alexandrines nivosus*) enclosure (Coastal Development Permit No. 5-06-0343-W). The western snowy plover, a bird species listed as federally threatened and as a state species of special concern, is known to occur near the project area. However, due to the project site's distance from the enclosure and the passive proposed operations, involving no major site preparation, the western snowy plovers are not anticipated to be adversely affected by the project.

CONCLUSION

The proposed foredune habitat would be created and maintained in a manner that would sustain and enhance the biological productivity of coastal waters as required by Section 30231 of the Coastal Act. The Commission, therefore, finds that, as conditioned, the proposed development will be consistent with Section 30230, 30231 and 30240 of the Coastal Act.

F. LOCAL COASTAL PROGRAM (LCP)

Coastal Act section 30604(a) states that, prior to certification of a local coastal program ("LCP"), a coastal development permit can only be issued upon a finding that the proposed development is in conformity with Chapter 3 of the Act and that the permitted development will not prejudice the ability of the local government to prepare an LCP that is in conformity with Chapter 3. In August 1992, the Commission certified, with suggested modifications, the land use plan portion of the City of Santa Monica's Local Coastal Program, excluding the area west of Ocean Avenue and Neilson way (Beach Overlay District). On September 15, 1992, the City of Santa Monica accepted the LUP with suggested modifications. As conditioned, the proposed development is consistent with Chapter 3 of the Coastal Act. Approval of the project, as conditioned, will therefore not prejudice the ability of the local government to prepare an LCP that is in conformity with the provisions of Chapter 3 of the Coastal Act.

G. CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA)

Section 13096 of the Commission's regulations requires Commission approval of coastal development permit applications to be supported by a finding showing the application, as conditioned by any conditions of approval, to be consistent with any applicable requirements of the

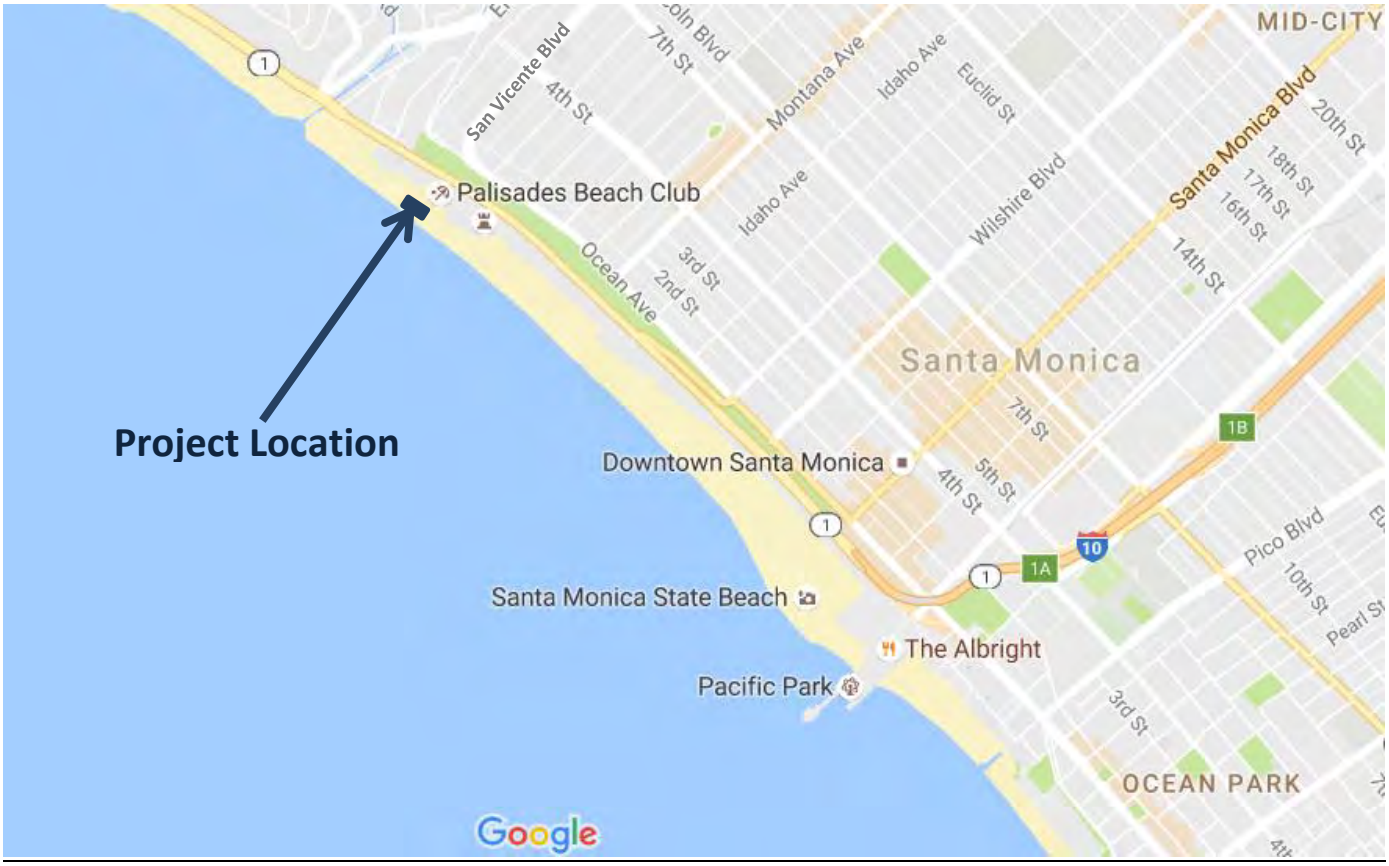
California Environmental Quality Act (CEQA). Section 21080.5(d)(2)(A) of CEQA prohibits a proposed development from being approved if there are feasible alternatives or feasible mitigation measures available which would substantially lessen any significant adverse effect which the activity may have on the environment.

The development, as conditioned, is consistent with the Chapter 3 policies of the Coastal Act. **Special Conditions** imposed will mitigate adverse impacts to coastal resources and public access. The **Special Conditions** address the following issues: **1)** an assumption of risk agreement to acknowledge inherent coastal hazards adjacent to the project; **2)** duration of permit with limited development authorization period; **3)** final dune habitat creation plan; **4)** public access requirements; and **5)** compliance with the proposed project and all special conditions of the permit. The Commission also analyzed various alternative locations for the project but determined that they were either infeasible or would have greater environmental impacts. Therefore, the Commission finds that there are no feasible alternatives or feasible mitigation measures available which would substantially lessen any significant adverse effect of the proposed project, and finds that the project is consistent with CEQA and the policies of the Coastal Act.

Appendix A - Substantive File Documents

- City of Santa Monica certified Land Use Plan
- Coastal Development Permit Application No. 5-16-0632
- Coastal Development Permit Application No. 5-06-0343-W: Temporary Western Snowy Plover Enclosure

PROJECT LOCATION: Three-acres of Santa Monica State Beach, perpendicular to San Vicente Boulevard, Santa Monica, Los Angeles County (Latitude: 34.024205 °; Longitude : -118.516220 °)



EXISTING AT PROJECT LOCATION

Proposed Dune Site

SANTA MONICA BEACH RESTORATION PILOT PROJECT

Proposed Site

Legend

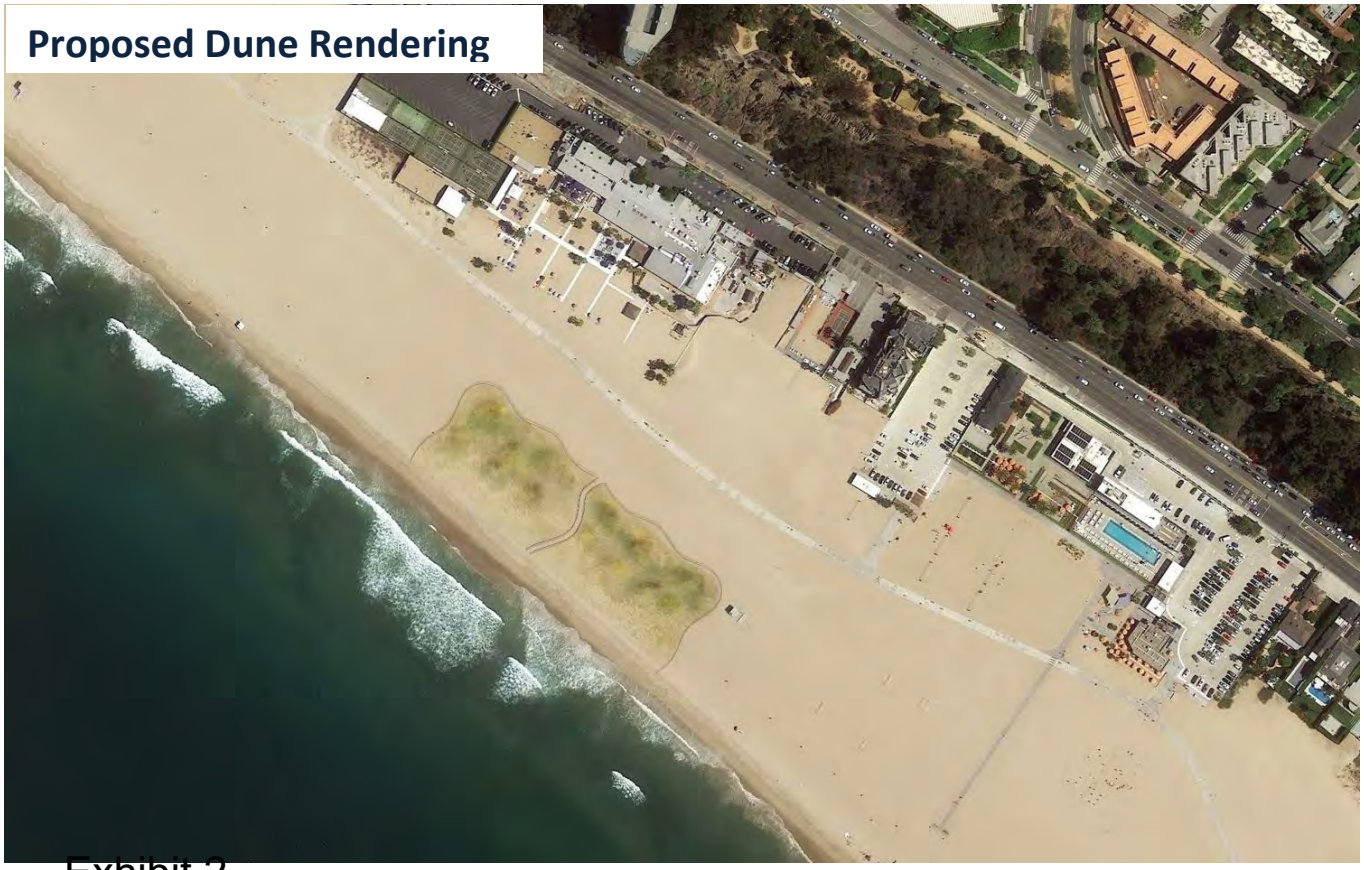
- Wash Zone *
- Bike Path
- Bike Path 30m Buffer
- Project Area

Details:
Project Area = 2.00 acres
Wash Zone Area = 1.00 acres
Total Area = 3.00 acres

* Wash zone is not the high tide deliniation, it is the ungroomed area in front of the restoration site.

THE BAY FOUNDATION

Proposed Dune Rendering



PROPOSED

PROPOSED

PROPOSED

Heal the Bay

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Santa Monica CA 90401

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www.healthebay.org

June 19, 2014

Wildlife Conservation Society
301 N Willson Avenue
Bozeman, MT 59715
(404) 274-1703

Dear Wildlife Conservation Society:

I am writing on behalf of Heal the Bay, a non-profit environmental group with over 15,000 members, to express our strong support for the Santa Monica Bay Restoration Foundation (SMBRF)'s proposal, "Beach and Dune Enhancement Pilot Project" to the Wildlife Conservation Society's Climate Adaptation Fund. This project is a partnership between California State Parks, the City of Santa Monica, SMBRF, Coastal Restoration Consultants, Inc., and Cooper Ecological Monitoring.

The sandy beaches in the Santa Monica Bay area have been highly impacted through active sediment transport and sand replenishment, daily mechanized maintenance, vehicular transport, and the removal of native vegetation. As a result, these activities have caused a destructive loss of natural beach morphology. Sandy beaches are one of the most vulnerable habitats to climate change, sea level rise, and erosion, while at the same time offering one of the last forms of natural protection to our homes, roads, and infrastructure. By restoring natural processes to these impacted beach habitats, this cost-effective project will improve these natural functions while creating a diverse native ecosystem that manages sand transport in a way that will help to combat the impacts of climate change. Additionally, this demonstration project will provide an educational opportunity to recreational beach users and community groups.

The project will help combat climate change, beach erosion, and sea level rise by implementing cost-effective active and passive restoration. It will also increase native flora and fauna biodiversity through the preservation and enhancement of an important and often over-managed ecosystem. The site location in Santa Monica was chosen to minimize the impacts to recreation and current beach use, while maximizing the ecological benefits and supplemental educational benefits from the proximity to existing trail systems.

Heal the Bay works closely with the Santa Monica Bay Restoration Foundation on climate change and other issues related to watershed and coastal ecosystem health. We are committed to helping build understanding and support for coastal climate change adaptation planning at the local level, and advancing sound climate change adaptation policies at the local and state level. We are actively engaged in education and outreach efforts related to coastal climate change impacts and related adaptation

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measures. We are also partnering with local community groups and municipalities to advance coastal climate change related research, planning efforts, and adaptation measures in the Los Angeles region.

We fully support the proposed Santa Monica Bay Restoration Foundation grant application. Please feel free to contact me at 310-451-1500 x 163 or ssikich@healthebay.org if you have any questions. Thank you for your consideration.

Sincerely,

Sarah A. Sikich, MESM
Coastal Resources Director
ssikich@healthebay.org
310-451-1500 x 163

State of California • Natural Resources Agency
Edmund G. Brown Jr., *Governor*
DEPARTMENT OF PARKS AND RECREATION
Lisa Ann L. Mangat, *Director*
Angeles District
1925 Las Virgenes Road
Calabasas, California, 91302

June 27, 2016

California Coastal Commission
South Coast Area Office
200 Oceangate, Suite 1000
Long Beach, CA 90802-4302

Re: Support Letter for Santa Monica State Beach Restoration Pilot Project

Dear Honorable Commissioners:

The California Department of Parks and Recreation, Angeles District (State Parks), strongly supports the "Santa Monica Beach Restoration Pilot Project" proposed by The Bay Foundation (TBF) and the City of Santa Monica. As the land owner, California State Parks is committed to collaborating with The Bay Foundation and the City of Santa Monica to advance climate change adaptation planning and implementation along the Santa Monica Bay coast.

The sandy beaches of the Santa Monica Bay have been highly impacted through active sediment transport and sand replenishment, daily mechanized maintenance, vehicular use, and the removal of native vegetation. These activities have resulted in a destructive loss of natural beach morphology. Sandy beaches are one of the most vulnerable habitats to climate change, sea level rise, and erosion, while at the same time offering one of the last forms of natural protection to our homes, roads, and infrastructure. By restoring natural processes to these impacted beach habitats, this cost-effective and low-impact project will improve natural functions while creating a diverse native ecosystem that manages sand transport in a way that will help combat the impacts of climate change. Additionally, this demonstration project will provide an educational opportunity to recreational beach users and community groups.

The project will combat climate change, beach erosion, and sea level rise by implementing cost-effective restoration to enhance a highly developed Los Angeles coastline in an approximately three-acre area. It will also increase native floral and

faunal biodiversity through the preservation and enhancement of an important and often over-managed ecosystem. The site in Santa Monica was chosen to minimize the impacts to recreation and current beach use, while maximizing the ecological and educational benefits from the proximity to existing trail systems. This project will allow residents and visitors to the Santa Monica beaches a chance to become familiar with a healthy and natural landscape, while still allowing all other existing recreational uses of the beach. More detailed information can be found on the project's webpage: http://www.santamonicabay.org/santa-monica-beach-restoration-pilot/.

This proposed demonstration project is particularly relevant as it aligns closely with our mission to provide for the health, inspiration, and education of the people of California by helping to preserve the state's extraordinary biological diversity, protect its most valued natural and cultural resources, and to create opportunities for high-quality outdoor recreation. We anticipate that the project will identify practical solutions to improve resource protection on State Parks beaches that we manage, or are managed by our partner agencies, and provide a model to replicate on other State Parks beaches.

California State Parks has a proud history of restoration in southern California including the Malibu Lagoon Restoration and Enhancement Project, the Topanga Creek Berm Removal Project, and other habitat restoration projects throughout the Angeles District.

Please consider approving and moving forward with the Coastal Development Permit for this project. Thank you for your consideration. Please feel free to contact my staff, Danielle LeFer, Environmental Scientist, at 818 880-0365, if we can provide additional information.

Sincerely,

Craig Sap
District Superintendent

Cc: Karina Johnston, Director of Watershed Programs, The Bay Foundation

University of Southern California Sea Grant Program
Wrigley Institute for Environmental Studies University of Southern California
University Park Campus, CAS 200, Los Angeles, California 90089
213-740-1961 Fax 213-740-5936
email:seagrant@usc.edu www.dornsife.usc.edu/uscseagrant

August 11, 2016

California Coastal Commission
South Coast Area Office
200 Oceangate, Suite 1000
Long Beach, CA 90802-4302

Subject: Support Letter for Santa Monica Beach Restoration Pilot Project

Dear California Coastal Commission:

The University of Southern California (USC) Sea Grant Program strongly supports The Bay Foundation (TBF) and the City of Santa Monica's project: "Santa Monica Beach Restoration Pilot Project," and we recommend permitting for the project.

The USC Sea Grant program works closely with local communities in Southern California to identify vulnerabilities to sea level rise and coastal hazards using the best available science and helps communities evaluate potential strategies to address these challenges. In Southern California, our sandy beaches are one of the most vulnerable habitats to climate change, sea level rise, and erosion. They also provide one of the last forms of natural protection to our homes, roads, and infrastructure. The sandy beaches in the Santa Monica Bay area have been highly impacted through active sediment transport and sand replenishment, maintenance, vehicular transport, and the removal of native vegetation. As a result, these impacts have caused a destructive loss of natural beach morphology. Restoring natural processes to these impacted beach habitats, through a cost-effective and low-impact project, will improve natural functions and create a diverse native ecosystem that manages sand transport in a way that will build resiliency in the face of climate change. Additionally, this demonstration project will provide an educational opportunity to recreational beach users and community groups.

This proposed project is particularly relevant, as it seeks to test restored natural/nature-based processes as a strategy to combat rising seas and impacts from coastal storms. USC Sea Grant manages a coalition of nearly 250 Los Angeles-based stakeholders grappling with these challenges. Again and again, local communities have requested tried and tested adaptation examples, particularly natural approaches, before making decisions on appropriate adaptation strategies for their community. This demonstration project seeks to answer questions critical to both regional and statewide decision-makers.

The project will increase the beach's adaptive capacity to overcome climate change by reducing beach erosion and altering the beach profile, i.e. allowing the establishment and development of small plant hummocks and fore-dunes. The area will be seeded and maintained to promote the growth of native

beach flora, which should attract native fauna, increasing biodiversity. This project is a cost-effective restoration and research project designed to enhance a highly developed Los Angeles coastline in an approximately 3-acre area.

The site location in Santa Monica was chosen to minimize the impacts to recreation and current beach use, while maximizing the ecological benefits and supplemental educational benefits from the proximity to existing trail systems. This project will allow visitors and residents to the Santa Monica beaches an educational opportunity to become familiar with a healthy and natural landscape, while still allowing all other existing recreational uses of the beach. More detailed information can be found on the project's webpage: http://www.santamonicabay.org/santa-monica-beach-restoration-pilot/.

Please consider approving and moving forward with their Coastal Development Permit. We consider this project to be of the utmost importance in our area and an excellent opportunity to evaluate a low-impact pilot project. Thank you for your consideration. Please feel free to contact me if you have further questions.

Sincerely,

Phyllis Grifman
Associate Director
USC Sea Grant
grifman@usc.edu / 213-740-1961

Cc: Karina Johnston, Director of Watershed Programs, The Bay Foundation, via email

12 August 2016

California Coastal Commission
South Coast Area Office
200 Oceangate, Suite 1000
Long Beach, CA 90802-4302

RE: Support Letter for Santa Monica Beach Restoration Pilot Project

Dear California Coastal Commission:

It is with great enthusiasm that my landscape architecture and urban design firm, Mia Lehrer + Associates (MLA) submits this letter of support for The Bay Foundation (TBF) and the City of Santa Monica's project: "Santa Monica Beach Restoration Pilot Project." My firm and I strongly recommend permitting for the project.

Sandy beaches offer one of the last forms of natural protection to our homes, roads, and infrastructure, but are one of the most vulnerable habitats to climate change, sea level rise, and erosion. The beaches in the Santa Monica Bay area have been highly impacted through active sediment transport and sand replenishment, daily mechanized maintenance, vehicular transport, and the removal of native vegetation. Restoring natural processes to these impacted beach habitats, through a cost-effective and low-impact project such as this, will improve ecological functions and help build coastal resiliency in the face of climate change.

The project location in Santa Monica minimizes the impacts to recreation and current beach use, while maximizing the ecological benefits and supplemental educational benefits from the proximity to existing trail systems. The project will allow visitors and residents to the Santa Monica beaches an educational opportunity to become familiar with a healthy and natural landscape, while still allowing all other existing recreational uses of the beach. More detailed information can be found on the project's webpage: http://www.santamonicabay.org/santa-monica-beach-restoration-pilot/.

Please consider approving and moving forward with the Coastal Development Permit for this project. My firm and I consider this project to be of the utmost importance in our area and an excellent opportunity to evaluate a low-impact pilot project. Thank you for your consideration, and please feel free to contact me if you have further questions.

Sincerely,

Mia Lehrer
President, FASLA
Mia Lehrer + Associates

Cc: Karina Johnston, Director of Watershed Programs, The Bay Foundation, via email

185 S. Myers Street Los Angeles CA 90033 *tel* 213 384 3844 *fax* 213 384 3833 *website* www.mlagreen.com

800 Wilshire Blvd, 16th Floor
Los Angeles, CA 90017
(213) 689-9707
usgbc-la.org

California Coastal Commission
South Coast Area Office
200 Oceangate, Suite 1000
Long Beach, CA 90802-4302

17 August 2016

Subject: Support Letter for Santa Monica Beach Restoration Pilot Project

Dear California Coastal Commission:

US Green Building Council- Los Angeles (USGBC-LA) strongly supports The Bay Foundation (TBF) and the City of Santa Monica's project: "Santa Monica Beach Restoration Pilot Project," and we recommend permitting for the project.

Sandy beaches are one of the most vulnerable habitats to climate change, sea level rise, and erosion, while at the same time offering one of the last forms of natural protection to our homes, roads, and infrastructure, key elements of USGBC-LA's focus and our Building Resilience-L.A program. The sandy beaches in the Santa Monica Bay area have been highly impacted through active sediment transport and sand replenishment, daily mechanized maintenance, vehicular transport, and the removal of native vegetation. As a result, these impacts have caused a destructive loss of natural beach morphology. Restoring natural processes to these impacted beach habitats, through a cost-effective and low-impact project, will improve natural functions and create a diverse native ecosystem that manages sand transport in a way that will build resiliency in the face of climate change. Additionally, this demonstration project will provide an educational opportunity to recreational beach users and community groups.

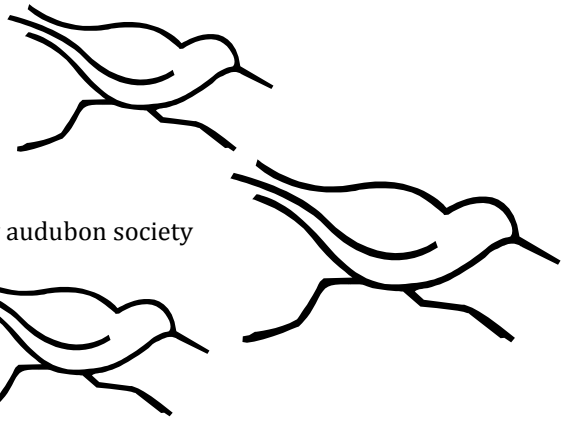
The project will increase the beach's adaptive capacity to overcome climate change by reducing beach erosion and altering the beach profile, i.e. allowing the establishment and development of small plant hummocks and fore-dunes. The area will be seeded and maintained to promote the growth of native beach flora, which should attract native fauna, increasing biodiversity. This project is a cost-effective restoration and research project designed to enhance a highly developed Los Angeles coastline in an approximately 3-acre area.

The site location in Santa Monica was chosen to minimize the impacts to recreation and current beach use, while maximizing the ecological benefits and supplemental educational benefits from the proximity to existing trail systems. This project will allow visitors and residents to the Santa Monica beaches an educational opportunity to become familiar with a healthy and natural landscape, while still allowing all other existing recreational uses of the beach. More detailed information can be found on the project's webpage: http://www.santamonicabay.org/santa-monica-beach-restoration-pilot/

Sincerely,

Dominique Hargreaves
Executive Director, USGBC – Los Angeles

Cc: Karina Johnston, Director of Watershed Programs, The Bay Foundation, via email



santa monica bay audubon society

California Coastal Commission
South Coast Area Office
200 Oceangate, Suite 1000
Long Beach, CA 90802-4302

25 August 2016

Subject: Support Letter for Santa Monica Beach Restoration Pilot Project

Dear California Coastal Commission:

Santa Monica Bay Audubon Society (SMBAS) strongly supports The Bay Foundation (TBF) and the City of Santa Monica's project: "Santa Monica Beach Restoration Pilot Project," and we recommend permitting for the project.

Sandy beaches are one of the most vulnerable habitats to climate change, sea level rise, and erosion, while at the same time offering one of the last forms of natural protection to our homes, roads, and infrastructure. The sandy beaches in the Santa Monica Bay area have been highly impacted through active sediment transport and sand replenishment, daily mechanized maintenance, vehicular transport, and the removal of native vegetation. As a result, these impacts have caused a destructive loss of natural beach morphology. Restoring natural processes to these impacted beach habitats, through a cost-effective and low-impact project, will improve natural functions and create a diverse native ecosystem that manages sand transport in a way that will build resiliency in the face of climate change. Additionally, this demonstration project will provide an educational opportunity to recreational beach users and community groups.

This proposed project is particularly relevant, as it aligns with the educational mission of SMBAS. It could serve as a demonstration project both regionally and statewide. In addition, initial outreach meetings to local residents have shown general support. Coastal residents are starting to become aware that there should be a plan for coping with rising sea levels.

The project will increase the beach's adaptive capacity to overcome climate change by reducing beach erosion and altering the beach profile, *i.e.* allowing the establishment and development of small plant hummocks and fore-dunes. The area will be seeded and maintained to promote the growth of native beach flora, which should attract native fauna, increasing biodiversity. This project is a cost-effective restoration and research project designed to enhance a highly developed Los Angeles coastline in an approximately 3-acre area.

post office box 35 pacific palisades california 90272

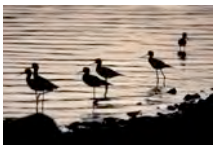
The site location in Santa Monica was chosen to minimize the impacts to recreation and current beach use, while maximizing the ecological benefits and supplemental educational benefits from the proximity to existing trail systems. This project will allow visitors and residents to the Santa Monica beaches an educational opportunity to become familiar with a healthy and natural landscape, while still allowing all other existing recreational uses of the beach.

Please consider approving and moving forward with their Coastal Development Permit. We consider this project to be of the utmost importance in our area and an excellent opportunity to evaluate a low-impact pilot project. Thank you for your consideration. Please feel free to contact me at 310.395.6235 if you have further questions.

Sincerely,

Lucien (Lu) Plauzoles
Conservation Chair, SMBAS

Cc: Karina Johnston, Director of Watershed Programs, The Bay Foundation, via email



Cooper Ecological Monitoring, Inc.
EIN 72-1598095
Daniel S. Cooper, President
255 Satinwood Ave.
Oak Park, CA 91377
(323) 397-3562; dan@cooperecological.com

California Coastal Commission
South Coast Area Office
200 Oceangate, Suite 1000
Long Beach, CA 90802-4302

2 September 2016

Subject: Support Letter for Santa Monica Beach Restoration Pilot Project

Dear California Coastal Commission:

Cooper Ecological Monitoring, Inc. strongly supports The Bay Foundation (TBF) and the City of Santa Monica's project: "Santa Monica Beach Restoration Pilot Project," and we recommend permitting for the project.

Sandy beaches are one of the most vulnerable habitats to climate change, sea level rise, and erosion, while at the same time offering one of the last forms of natural protection to our homes, roads, and infrastructure. The sandy beaches in the Santa Monica Bay area have been highly impacted through active sediment transport and sand replenishment, daily mechanized maintenance, vehicular transport, and the removal of native vegetation. As a result, these impacts have caused a destructive loss of natural beach morphology. Restoring natural processes to these impacted beach habitats, through a cost-effective and low-impact project, will improve natural functions and create a diverse native ecosystem that manages sand transport in a way that will build resiliency in the face of climate change. Additionally, this demonstration project will provide an educational opportunity to recreational beach users and community groups.

This proposed project is particularly relevant, as it aligns with our goal of supporting the science behind restoring coastal strand habitat. As president of Cooper Ecological, I have been involved in the "Beach Ecology Coalition" for the past several years headed by Dr. Karen Martin of Pepperdine University, where we encourage beach managers to be more mindful of the fragile ecosystem of our sandy beach habitat, home to multiple narrowly endemic species as well as special-status taxa like the Western Snowy Plover. I am also a trained "Grunion Greeter" and have participated in grunion count surveys on local beaches. This Santa Monica Bay project has the potential to be a true showcase to balance human use of the beach with restored wildlife habitat.

The project will increase the beach's adaptive capacity to adapt to climate change by reducing beach erosion and should allow for the establishment and development of small, natural dune hummocks and

other natural coastal strand features that have protected beaches for millennia. The area will be seeded and maintained to promote the growth of native beach flora, which should attract native fauna (and discourage non-native fauna), increasing local and global biodiversity. This project is a cost-effective restoration and research project designed to enhance a highly developed Los Angeles coastline in an approximately 3-acre area.

The site location in Santa Monica was chosen to minimize the impacts to recreation and current beach use, while maximizing the ecological benefits and supplemental educational benefits from the proximity to existing trail systems. This project will allow visitors and residents to the Santa Monica beaches an educational opportunity to become familiar with a healthy and natural landscape, while still allowing all other existing recreational uses of the beach. More detailed information can be found on the project's webpage: http://www.santamonicabay.org/santa-monica-beach-restoration-pilot/.

Please consider approving and moving forward with their Coastal Development Permit. We consider this project to be of the utmost importance in our area and an excellent opportunity to evaluate a low-impact pilot project. Thank you for your consideration. Please feel free to contact me if you have further questions.

Sincerely,

Daniel Cooper

Daniel S. Cooper, MSc.
President, Cooper Ecological Monitoring, Inc.

Cc: Karina Johnston, Director of Watershed Programs, The Bay Foundation, via email

Coastal Conservancy

California Coastal Commission
South Coast Area Office
200 Oceangate, Suite 1000
Long Beach, CA 90802-4302

6 September 2016

Subject: Support Letter for Santa Monica Beach Restoration Pilot Project

Dear California Coastal Commission:

The State Coastal Conservancy strongly supports The Bay Foundation (TBF) and the City of Santa Monica's project: "Santa Monica Beach Restoration Pilot Project," and we recommend permitting for the project.

Sandy beaches are one of the most vulnerable habitats to climate change, sea level rise, and erosion, while at the same time offering one of the last forms of natural protection to our homes, roads, and infrastructure. The sandy beaches in the Santa Monica Bay area have been highly impacted through active sediment transport and sand replenishment, daily mechanized maintenance, vehicular transport, and the removal of native vegetation. As a result, these impacts have caused a destructive loss of natural beach morphology. Restoring natural processes to these impacted beach habitats, through a cost-effective and low-impact project, will improve natural functions and create a diverse native ecosystem that manages sand transport in a way that will build resiliency in the face of climate change. Additionally, this demonstration project will provide an educational opportunity to recreational beach users and community groups.

This proposed project is particularly relevant, as it aligns with the State Coastal Conservancy's Strategic Plan. In particular, the project will enhance biological diversity and habitat within coastal watersheds (Goal 5) and enhance the resiliency of coastal communities and ecosystems to the impacts of climate change (Goal 7). It could serve as a demonstration project both regionally and state-wide. For instance, this project will inform other projects such as the on-going dune restoration project in San Diego County at Cardiff State Beach funded by the State Coastal Conservancy.

The project will increase the beach's adaptive capacity to overcome climate change by reducing beach erosion and altering the beach profile, i.e. allowing the establishment and development of small plant hummocks and fore-dunes. The area will be seeded and maintained to promote the growth of native beach flora, which should attract native fauna, increasing biodiversity. This project is a cost-effective

1330 Broadway, 13th Floor
Oakland, California 94612-2512
510-286-1015 Fax: 510-286-0470

restoration and research project designed to enhance a highly developed Los Angeles coastline in an approximately 3-acre area.

The site location in Santa Monica was chosen to minimize the impacts to recreation and current beach use, while maximizing the ecological benefits and supplemental educational benefits from the proximity to existing trail systems. This project will allow visitors and residents to the Santa Monica beaches an educational opportunity to become familiar with a healthy and natural landscape, while still allowing all other existing recreational uses of the beach. More detailed information can be found on the project's webpage: http://www.santamonicabay.org/santa-monica-beach-restoration-pilot/.

Please consider approving and moving forward with their Coastal Development Permit. We consider this project to be of the utmost importance in our area and an excellent opportunity to evaluate a low-impact pilot project. Thank you for your consideration. Please feel free to contact me if you have further questions.

Sincerely,

Joan Cardellino, South Coast Program Manager
California State Coastal Conservancy

Cc: Karina Johnston, Director of Watershed Programs, The Bay Foundation, via email

BEACH ECOLOGY COALITION

To enhance ecosystem conservation
and beach management
to balance natural resource
protection and recreational use.

September 6, 2016

California Coastal Commission

Greetings,

I am writing in support of the proposed restoration project for Santa Monica City Beach. Our organization has a long history of working collaboratively with many different stakeholders and constituencies, including the Santa Monica Bay Restoration Commission.

There is a need for greater public understanding of the ecological functions of beach ecosystems. Our organization supports the efforts of the Santa Monica Bay Restoration Commission to address the potential for soft-engineering solutions such as living shorelines to conserve beaches along the California coast. The proposed project will provide an opportunity for native plants and animals to return to a historic location.

As we adapt to climate change it is important to preserve ecological functions and address impacts of our beach management actions with the help of on-the-ground projects, scientific studies, and collaborative discussion.

We in the Beach Ecology Coalition are very concerned with beach management issues that address wildlife conservation and human recreation. We strongly support the implementation of this restoration project.

Sincerely,

Dennis J. Simmons

President, Beach Ecology Coalition

Beach Manager, City of San Diego (retired)

24255 Pacific Coast Highway, Malibu, CA 90263
BeachEcologyCoalition.Org

Heal the Bay

1444 9th Street
Santa Monica CA 90401

ph 310 451 1550
fax 310 496 1902

info@healthebay.org
www.healthebay.org

September 7, 2016

California Coastal Commission
South Coast Area Office
200 Oceangate, Suite 1000
Long Beach, CA 90802-4302

Re: Support Letter for Santa Monica Beach Restoration Pilot Project

Dear California Coastal Commission,

On behalf of Heal the Bay, an environmental non-profit organization with over 15,000 members dedicated to making the coastal waters and watersheds of Southern California safe, healthy, and clean since 1985, we write in strong support of Bay Foundation (TBF) and the City of Santa Monica's "Santa Monica Beach Restoration Pilot Project." Heal the Bay works closely with TBF on climate change and other issues related to watershed and coastal ecosystem health. We are committed to helping build understanding and support for coastal climate change adaptation planning at the local level, and advancing sound climate change adaptation policies at the local and state level.

Heal the Bay works within communities struggling with coastal land use decisions and facing sea level rise, partnering with local community groups and municipalities to advance coastal climate change related research, planning efforts, and adaptation measures in the Los Angeles region. In the face of climate change, investing time and resources into identifying and implementing environmentally-sound coastal adaptation solutions is imperative to building resilience in these communities. This project would be a step in the right direction when considering coastal adaptation options, as the project would employ a nature-based solution to enhance coastal resiliency, and would comply with the Commission's Sea Level Rise Policy Guidance.

The United States Geological Survey's Coastal Vulnerability Index rates most of the Southern California coast as "highly vulnerable" to coastal change due to sea level rise and climate change. Approximately 85% of California's residents live or work along bay or coastal areas and are facing sea-level rise.[1] As higher sea levels, increased storm surges, and inland flooding coincide, projected inundation is likely to impact water supply canals, wastewater treatment plants, power plants, and other critical infrastructure throughout California.[2] Heal the Bay plays an active role in supporting and encouraging local jurisdictions and state agencies to develop coastal development projects and policies that employ adaptation strategies to sea level rise that protect public safety and the environment. We feel like this project does just that.

Sandy beaches are one of the most vulnerable habitats to climate change, sea level rise, and erosion, while at the same time offering one of the last forms of natural protection to our homes, roads, and infrastructure. Sandy beaches in the Santa Monica Bay area have been highly impacted through active

[1] "Considering sea level rise as a coastal hazard," Proceedings of Coastal Zone '07 Portland, OR, (July 22-26, 2007); California Climate Adaptation Strategy at p. 3.
[2] California Climate Change Center, "The Impacts of Sea-Level Rise on the California Coast," (May 2009), available at www.pacinst.org/reports/sea_level_rise/report.pdf; CA Climate Adaptation Strategy, p. 65, 68.

Heal the Bay

1444 9th Street
Santa Monica CA 90401

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fax 310 496 1902

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www.healthebay.org

sediment transport and sand replenishment, daily mechanized maintenance, vehicular transport, and the removal of native vegetation. These impacts have caused a destructive loss of natural beach morphology. Restoring natural processes to these impacted beach habitats, through a cost-effective and low-impact project, will improve natural functions and create a diverse native ecosystem that manages sand transport in a way that will build resiliency in the face of climate change.

The proposed project will increase the beach's adaptive capacity to overcome climate change by reducing beach erosion and altering the beach profile, i.e. allowing the establishment and development of small plant hummocks and fore-dunes. The area will be seeded and maintained to promote the growth of native beach flora, which should attract native fauna, increasing biodiversity. This project is a cost-effective restoration and research project designed to enhance a highly developed Los Angeles coastline in an approximately 3-acre area. In addition, the site location in Santa Monica is at a location that will likely minimize the impacts to recreation and current beach use, while maximizing the ecological benefits and supplemental educational benefits from the proximity to existing trail systems. This project will allow visitors and residents to the Santa Monica beaches an educational opportunity to become familiar with a healthy and natural landscape, while still allowing all other existing recreational uses of the beach. It could also serve as a demonstration project both regionally and state-wide.

Please consider approving and moving forward with The Bay Foundation and City of Santa Monica's Coastal Development Permit. We fully support the proposed project. Environmentally-sound, nature-based adaptation strategies, such as wetland, dune, and beach protection are effective at helping buffer communities from sea-level rise and storm surges while enhancing coastal resources. The protection and stewardship of our coastal resources are among California's most important long-term responsibilities. Please feel free to contact me at 310-451-1500 x 112 or dmurray@healthebay.org if you have any questions. Thank you for your consideration.

Sincerely,

Dana Roeber Murray, MESM
Senior Coastal Policy Manager
Heal the Bay

Cc: Karina Johnston, Director of Watershed Programs, The Bay Foundation, via email

Friends of the LAX Dunes
www.FriendsOfTheLAXDunes.org

California Coastal Commission
South Coast Area Office
200 Oceangate, Suite 1000
Long Beach, CA 90802-4302

9 September 2016

Subject: Support Letter for Santa Monica Beach Restoration Pilot Project

Dear California Coastal Commission:

Friends of the LAX Dunes strongly supports The Bay Foundation (TBF) and the City of Santa Monica's project: "Santa Monica Beach Restoration Pilot Project," and we recommend permitting for the project.

Sandy beaches are one of the most vulnerable habitats to climate change, sea level rise, and erosion, while at the same time offering one of the last forms of natural protection to our homes, roads, and infrastructure. The sandy beaches in the Santa Monica Bay area have been highly impacted through active sediment transport and sand replenishment, daily mechanized maintenance, vehicular transport, and the removal of native vegetation. As a result, these impacts have caused a destructive loss of natural beach morphology. Restoring natural processes to these impacted beach habitats, through a cost-effective and low-impact project, will improve natural functions and create a diverse native ecosystem that manages sand transport in a way that will build resiliency in the face of climate change. Additionally, this demonstration project will provide an educational opportunity to recreational beach users and community groups.

This proposed project is particularly relevant, as Friends of the LAX Dunes is a volunteer organization that I founded to help restore this native habitat as part of my Girl Scout Gold Award project. Working with TBF, we've been enable to engage the community to help restore this site and hundreds of volunteers have participated in our volunteer events. We've had the support of several community organizations and corporations in our restoration efforts to date. This site could serve as a demonstration project both regionally and state-wide of community organizations working together to make a positive change.

The project will increase the beach's adaptive capacity to overcome climate change by reducing beach erosion and altering the beach profile, i.e. allowing the establishment and development of small plant hummocks and fore-dunes. The area will be seeded and maintained to promote the growth of native

beach flora, which should attract native fauna, increasing biodiversity. This project is a cost-effective restoration and research project designed to enhance a highly developed Los Angeles coastline in an approximately 3-acre area.

The site location in Santa Monica was chosen to minimize the impacts to recreation and current beach use, while maximizing the ecological benefits and supplemental educational benefits from the proximity to existing trail systems. This project will allow visitors and residents to the Santa Monica beaches an educational opportunity to become familiar with a healthy and natural landscape, while still allowing all other existing recreational uses of the beach. More detailed information can be found on the project's webpage: http://www.santamonicabay.org/santa-monica-beach-restoration-pilot/

Please consider approving and moving forward with their Coastal Development Permit. We consider this project to be of the utmost importance in our area and an excellent opportunity to evaluate a low-impact pilot project. Thank you for your consideration. Please feel free to contact me at a.n.neal2013@gmail.com or 310-922-2778 if you have further questions.

Sincerely,

Ayanna Neal
Founder and Board Member
Friends of the LAX Dunes

Cc: Karina Johnston, Director of Watershed Programs, The Bay Foundation, via email

girl scouts
greater los angeles

California Coastal Commission
South Coast Area Office
200 Oceangate, Suite 1000
Long Beach, CA 90802-4302

12 September 2016

Subject: Support Letter for Santa Monica Beach Restoration Pilot Project

Dear California Coastal Commission:

Troop 10975 of Girl Scouts of Greater Los Angeles strongly supports The Bay Foundation (TBF) and the City of Santa Monica's project: "Santa Monica Beach Restoration Pilot Project," and we recommend permitting for the project.

Sandy beaches are one of the most vulnerable habitats to climate change, sea level rise, and erosion, while at the same time offering one of the last forms of natural protection to our homes, roads, and infrastructure. The sandy beaches in the Santa Monica Bay area have been highly impacted through active sediment transport and sand replenishment, daily mechanized maintenance, vehicular transport, and the removal of native vegetation. As a result, these impacts have caused a destructive loss of natural beach morphology. Restoring natural processes to these impacted beach habitats, through a cost-effective and low-impact project, will improve natural functions and create a diverse native ecosystem that manages sand transport in a way that will build resiliency in the face of climate change. Additionally, this demonstration project will provide an educational opportunity to recreational beach users and community groups.

This proposed project is particularly relevant, as it provides an opportunity for our local youth to learn about environmental issues and endangered species. One of the girls from our Troop, Ayanna Neal, founded Friends of the LAX Dunes which is a volunteer organization that works with TBF to help restore this native habitat. This project was part of her Gold Award, one of the highest leadership awards a Girl Scout can earn. This project and this site has inspired other Girl Scouts and Boy Scouts to organize service projects to help with the ongoing restoration efforts. It could serve as a demonstration project both regionally and state-wide of community organizations working together to make a positive change.

The project will increase the beach's adaptive capacity to overcome climate change by reducing beach erosion and altering the beach profile, i.e. allowing the establishment and development of small plant hummocks and fore-dunes. The area will be seeded and maintained to promote the growth of native beach flora, which should attract native fauna, increasing biodiversity. This project is a cost-effective restoration and research project designed to enhance a highly developed Los Angeles coastline in an approximately 3-acre area.

girl scouts
greater los angeles

The site location in Santa Monica was chosen to minimize the impacts to recreation and current beach use, while maximizing the ecological benefits and supplemental educational benefits from the proximity to existing trail systems. This project will allow visitors and residents to the Santa Monica beaches an educational opportunity to become familiar with a healthy and natural landscape, while still allowing all other existing recreational uses of the beach. More detailed information can be found on the project's webpage: http://www.santamonicabay.org/santa-monica-beach-restoration-pilot/.

Please consider approving and moving forward with their Coastal Development Permit. We consider this project to be of the utmost importance in our area and an excellent opportunity to evaluate a low-impact pilot project. Thank you for your consideration. Please feel free to contact me if you have further questions.

Sincerely,

Carole Neal

Carole Neal
Troop Leader, Troop 10975
Girl Scouts of Greater Los Angeles

Cc: Karina Johnston, Director of Watershed Programs, The Bay Foundation, via email

Committees:

Chair
Personnel & Animal Welfare

Vice Chair
Transportation

Member
Budget & Finance
Energy & Environment

Website: http://cd5.lacity.org
Email: Paul.Koretz@lacity.org

City of Los Angeles

PAUL KORETZ
Councilmember, Fifth District

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Room 440
Los Angeles, CA 90012
(213) 473-7005
(213) 978-2250 Fax

Valley Office:
15760 Ventura Blvd.
Suite 600
Encino, CA 91436
(818) 971-3088
(818) 788-9210 Fax

West L.A. Office:
6380 Wishire Blvd.
Suite 800
Los Angeles, CA 90048
(323) 866-1828
(323) 852-1129 Fax

September 16, 2016

California Coastal Commission
South Coast Area Office
200 Oceangate, Suite 1000
Long Beach, CA 90802-4302

Subject: Support Letter for Santa Monica Beach Restoration Pilot Project

Dear California Coastal Commission:

As the author of the City of Los Angeles' climate change Council motion setting the City's greenhouse gas emissions reductions targets at 45% by 2025, 65% by 2035 and 80% by 2050, I write in strong support of The Bay Foundation (TBF) and the City of Santa Monica's project: "Santa Monica Beach Restoration Pilot Project," (SMBRPP) and recommend permitting for the project.

Sandy beaches are one of the most vulnerable habitats to climate change, sea level rise, and erosion, while at the same time offering one of the last forms of natural protection to our homes, roads, and infrastructure. The sandy beaches in the Santa Monica Bay area have been highly impacted through active sediment transport and sand replenishment, daily mechanized maintenance, vehicular transport, and the removal of native vegetation. As a result, these impacts have caused a destructive loss of natural beach morphology. Restoring natural processes to these impacted beach habitats, through a cost-effective and low-impact project, will improve natural functions and create a diverse native ecosystem that manages sand transport in a way that will build resiliency in the face of climate change. Additionally, this demonstration project will provide an educational opportunity to recreational beach users and community groups.

I am also author of a Council motion to account for and protect the biodiversity in Los Angeles. As you know, California is one of the world's 35 biodiversity hotspots and we must take responsibility for that profound distinction. The SMBRPP area will be seeded and maintained to promote the growth of native beach flora, which should attract native fauna, protecting biodiversity. This will increase the beach's adaptive capacity to overcome climate change by reducing beach erosion and altering the beach profile, i.e. allowing the establishment and development of small plant hummocks and fore-dunes. This project is a cost-effective restoration and research project designed to enhance a highly developed Los Angeles coastline in an approximately 3-acre area.

The site location in Santa Monica was chosen to minimize the impacts to recreation and current beach use, while maximizing the ecological benefits and supplemental educational benefits from the proximity to existing trail systems. This project will allow visitors and residents to the Santa Monica beaches an educational opportunity to become familiar with a healthy and natural landscape, while still allowing all other existing recreational uses of the beach. More detailed information can be found on the project's webpage: http://www.santamonicabay.org/santa-monica-beach-restoration-pilot/.

Please consider approving and moving forward with the Coastal Development Permit for this project. I consider this project to be of the utmost importance in our area and an excellent opportunity to evaluate a low-impact pilot project which we could then consider piloting within the jurisdiction of Los Angeles. Thank you for your consideration. Please feel free to contact me if you have further questions.

Sincerely,

PAUL KORETZ

Cc: Karina Johnston, Director of Watershed Programs, The Bay Foundation, via email

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California State Senate

SENATOR
FRAN PAVLEY
TWENTY-SEVENTH SENATE DISTRICT

COMMITTEES
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ENVIRONMENTAL QUALITY
GOVERNANCE & FINANCE

September 21, 2016

California Coastal Commission
South Coast Area Office
200 Oceangate, Suite 1000
Long Beach, CA 90802-4302

Subject: Support Letter for Santa Monica Beach Restoration Pilot Project

Dear California Coastal Commission:

As a State Senator who represented the City of Santa Monica for ten years, I strongly support The Bay Foundation (TBF) and the City of Santa Monica's "Santa Monica Beach Restoration Pilot Project", and recommend permitting for the project. As a former Coastal Commissioner, and current legislator who has authored several climate change-related policies, I fully understand the importance of increasing our coastal resilience to sea-level rise through the restoration of natural processes. This proposed project could serve as a low-impact demonstration project for coastal restoration and addressing sea-level rise both regionally and statewide.

Sandy beaches are one of the most vulnerable habitats to climate change, sea level rise, and erosion. At the same time, we depend on these habitats as one of the last forms of natural protection for coastal homes, roads, and infrastructure. In addition, active sediment transport and sand replenishment, daily mechanized maintenance, vehicular transport, and the removal of native vegetation have resulted in a destructive loss of the natural beach morphology in the Santa Monica Bay area.

The proposed project is a cost-effective restoration and research project designed to increase the beach's adaptive capacity to overcome climate change by reducing beach erosion and altering the beach profile in a 3-acre area. The area will be seeded and maintained to promote the growth of native beach flora, which should attract native fauna, thus increasing biodiversity. The site location minimizes impacts to recreation and current beach use, while maximizing the ecological benefits and supplemental educational benefits from the proximity to existing trail systems.

Restoring the natural processes of these impacted beach habitats through a cost-effective and low-impact project will improve natural functions and support a diverse native ecosystem that manages sand transport in a way that will increase coastal resiliency in the face of climate change. In addition, this demonstration project will provide an educational opportunity for recreational beach users and community groups to learn more about the vitality of these kinds of projects along our coast.

Please consider approving and moving forward with their Coastal Development Permit. This project provides an excellent opportunity to evaluate a low-impact pilot project.

Thank you for your consideration.

Sincerely,

Fran Pavley

Fran Pavley
California State Senator
District 27

Cc: Karina Johnston, Director of Watershed Programs, The Bay Foundation, via email