CALIFORNIA COASTAL COMMISSION
SOUTH CENTRAL COAST DISTRICT
89 SOUTH CALIFORNIA ST., SUITE 200
VENTURA, CA 93001
(805) 585-1800

Th15a

A-4-STB-19-0214 (Cosmoledo Trust)

April 13, 2023

Exhibits

Table of Contents

711 Sand Point Rd
Santa Claus Ln
Beach St
Cove St
Sandpiper Ln
Pier Dr
Cravens Ln
Via Real
El Camino Real
1
Trieste Ln
Venice Ln
Via Latina
Santa Monica Rd
Carpinteria Ave
Pear St
Crane Rd
Sand Point Rd
Sandyland Cove Rd
Avenue Del Mar
Google Earth
Image © 2019 TerraMetrics
© 2018 Google
2000 ft

Exhibit 1
Vicinity Map
Appeal No. A-4-STB-19-0214

Exhibit 2
Parcel Aerial
Appeal No. A-4-STB-19-0214

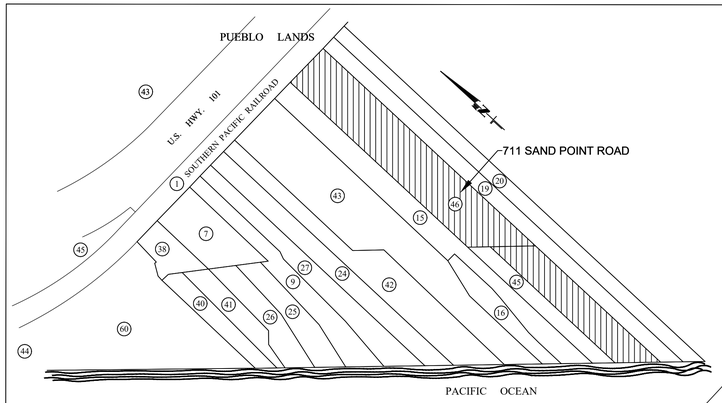
Photo 3: View of the redevelopment area along the east side of the existing residence and ice plant mats (Aspect: South). Photo taken July 10, 2018.

Photo 4: View of the back of the existing residence (Aspect: Northwest). Photo taken July 10, 2018.

Exhibit 3
Site Photos
Appeal No. A-4-STB-19-0214

Photo 5: View of the rock revetments along the beach (Aspect: West). Photo taken July 10, 2018.

Photo 6: View of the beach access trail behind the existing residence (Aspect: South). Photo taken July 10, 2018.



VICINITY MAP
scale: N. T. S

LOT SIZE: 6.30 ACRES/274,428.00 SQ. FT.

APN: 005-460-046

EXISTING RESIDENCE:	2850.00 SQ. FT.	2684.00 SQ.FT.
ADDITIONS UNDER (E) ROOF:	179.00 SQ. FT.	140.00 SQ.FT.
ADDITION OVER (E) DECK:	268.00 SQ. FT.	236.00 SQ.FT.
ADDITION NEW SQ. FT.:	400.00 SQ. FT.	356.00 SQ.FT.
NEW PROPOSED GROSS RESIDENCE:	3,697.00 SQ. FT.	3416.00 SQ.FT.
NET DIFFERENCE:	847.00 SQ. FT	732.00 SQ.FT.

COSMOLEDO TRUST

711 SAND POINT ROAD, CARPINTERIA, CA 93013

T.M.MORRISON & ASSOCIATES

1910 OUTPOST DRIVE,LOS ANGELES, CA 90068

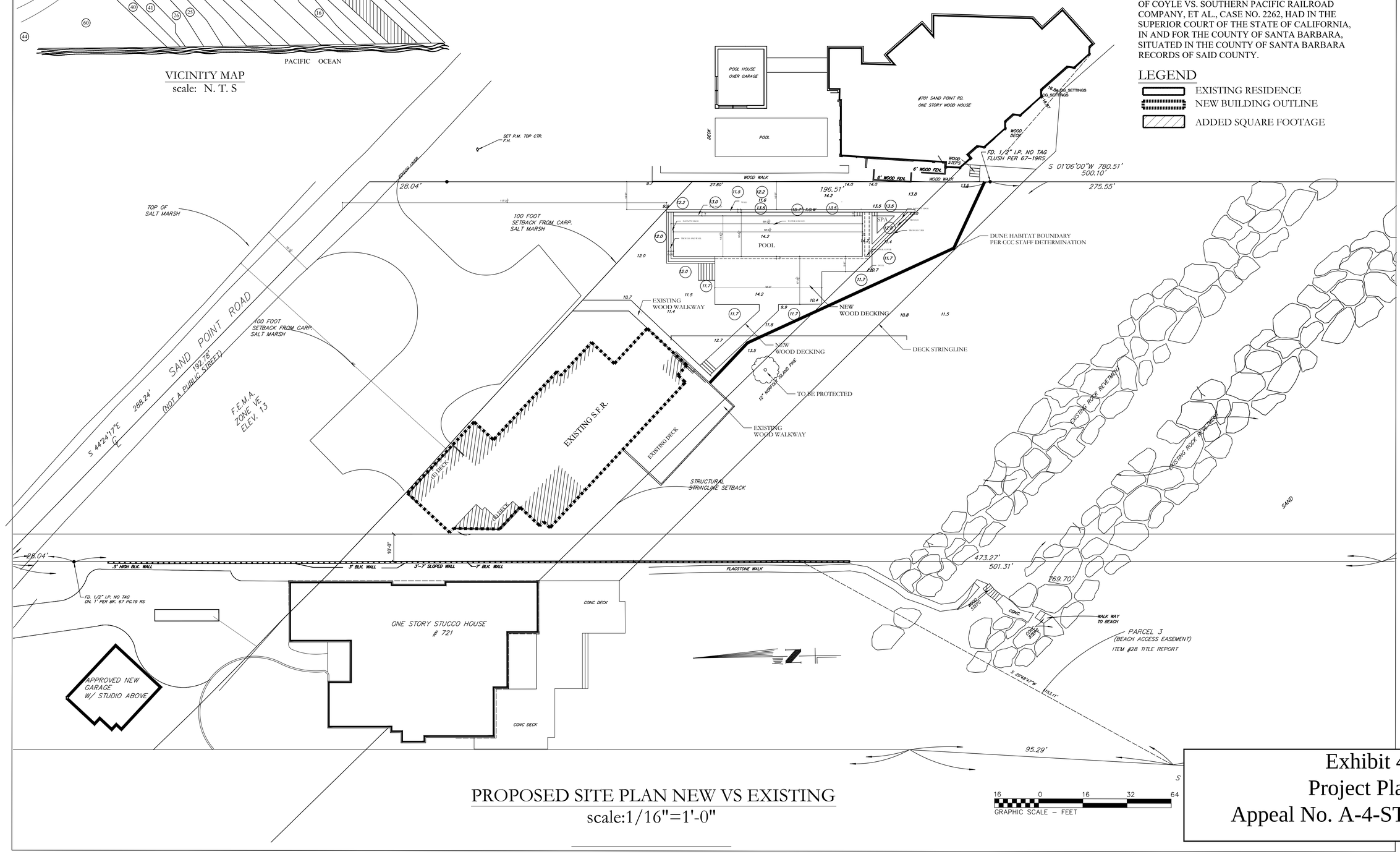
TEL: 323.512.7700 FAX: 323.378.5289

LEGAL DESCRIPTION

IN THE COUNTY OF SANTA BARBARA, STATE OF CALIFORNIA BEING A PORTION OF LOT 2, ACCORDING TO THE PARTITION MAP IN THE CASE OF COYLE VS. SOUTHERN PACIFIC RAILROAD COMPANY, ET AL., CASE NO. 2262, HAD IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA, IN AND FOR THE COUNTY OF SANTA BARBARA, SITUATED IN THE COUNTY OF SANTA BARBARA RECORDS OF SAID COUNTY.

LEGEND

- EXISTING RESIDENCE
- NEW BUILDING OUTLINE
- ADDED SQUARE FOOTAGE



PROPOSED SITE PLAN NEW VS EXISTING
scale:1/16"=1'-0"

T.M. MORRISON & ASSOCIATES

1910 OUTPOST DRIVE,
LOS ANGELES, CA 90068

TEL: 323.512.7700
FAX: 323.378.5289

CONSULTANTS

DOYLE-MORGAN STRUCTURAL ENGINEERING, INC
2040 ALAMEDA PADRE SERRA, SUITE 101
SANTA BARBARA, 93103
TEL: 805-569-1134

RRM DESIGN GROUP
10 EAST FIGUEROA ST. SUITE 200
SANTA BARBARA, 93101
TEL: 805-963-8283

PEARSON LAND SURVEYING
23371 MULHOLLAND DRIVE #330
WOODLAND HILLS, CA 91364
TEL: 818-591-8703

GIFFEN & CRANE GENERAL CONTRACTORS LLC
800 N. MILPAST ST., SUITE 2A
SANTA BARBARA, 93103
TEL: 805-966-6401

PACIFIC MATERIALS LABORATORY
35-A SOUTH LA PATERA LANE
P.O. BOX 96
GOLETA, CA 93166
TEL: 805-964-6901

PROJECT NAME

711 SAND POINT ROAD ,
CARPINTERIA,
CA 93013

REVISIONS:

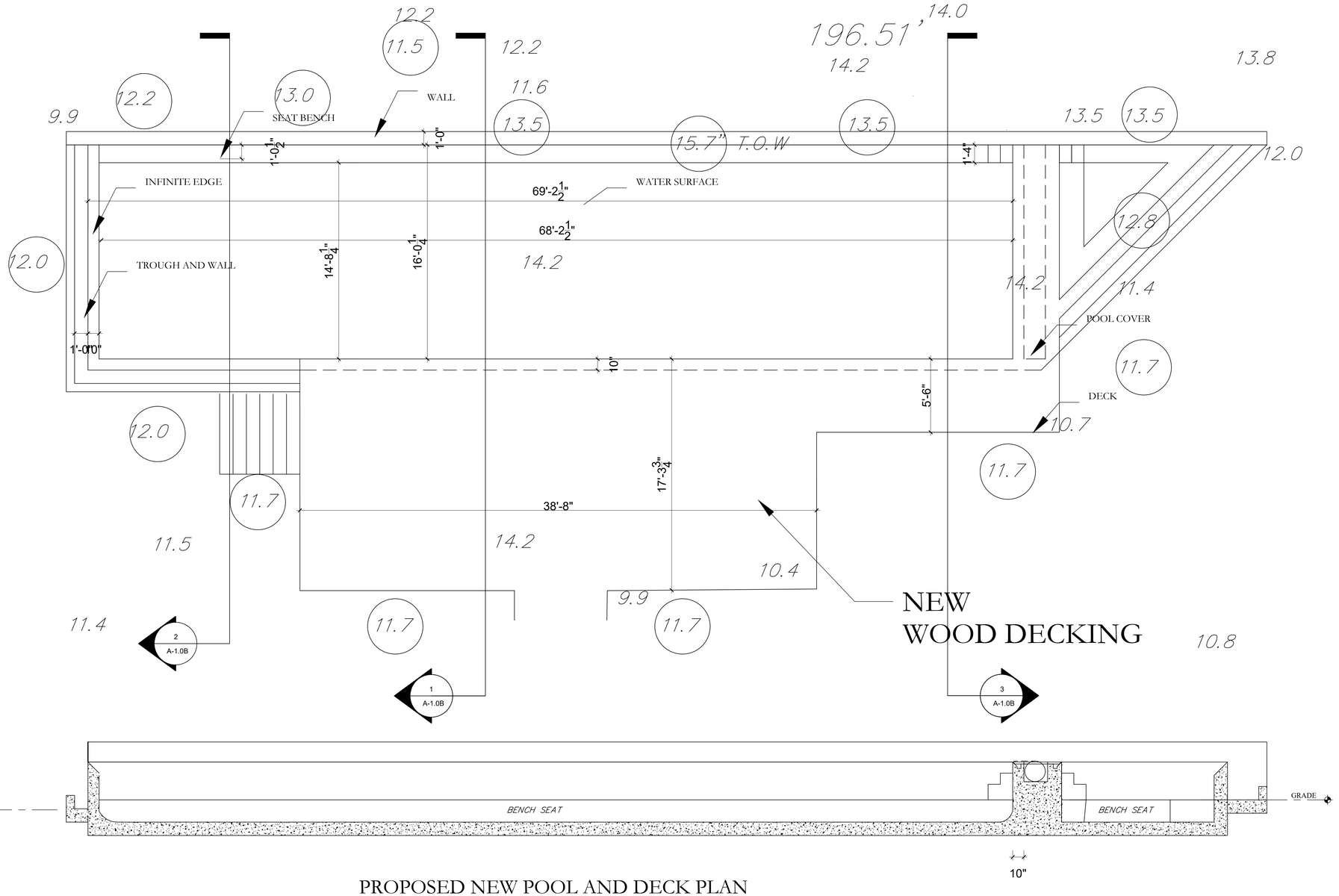
10/12/2022

SHEET TITLE

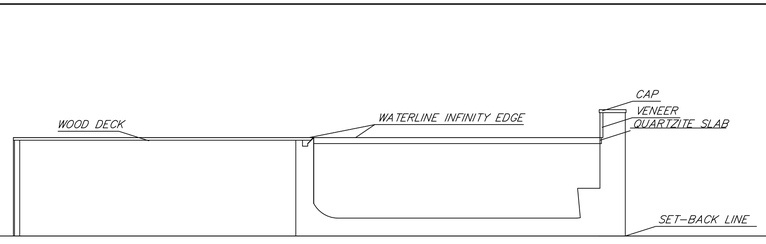
PROJECT INFORMATION, PROPOSED SITE PLAN, VICINITY MAP

Exhibit 4
Project Plans
Appeal No. A-4-STB-19-0214

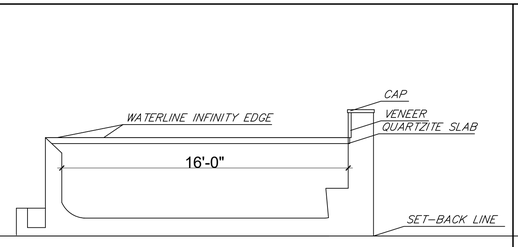
A-1.0



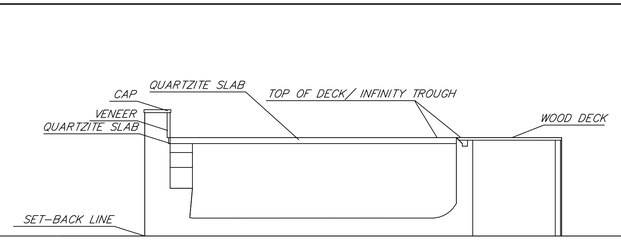
PROPOSED NEW POOL AND DECK PLAN
scale:1/4"=1'-0"



1 / A-1.0 — POOL ELEVATION 2
scale:1/4"=1'-0"



2 / A-1.0 — POOL ELEVATION 2
scale:1/4"=1'-0"



3 / A-1.0 — POOL ELEVATION 2
scale:1/4"=1'-0"

T.M. MORRISON & ASSOCIATES
1910 OUTPOST DRIVE,
LOS ANGELES, CA 90068
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PROJECT NAME

711 SAND POINT ROAD
CARPENTERIA,
CA 93013

REVISIONS:
10/11/2022

SHEET TITLE

PROPOSED DECK AND POOL PLANS AND ELEVATIONS

SCALE:
1/4"=1'-0"

DATE FIRST ISSUE:

A-1.1

WALL LEGEND

EXISTING WALL

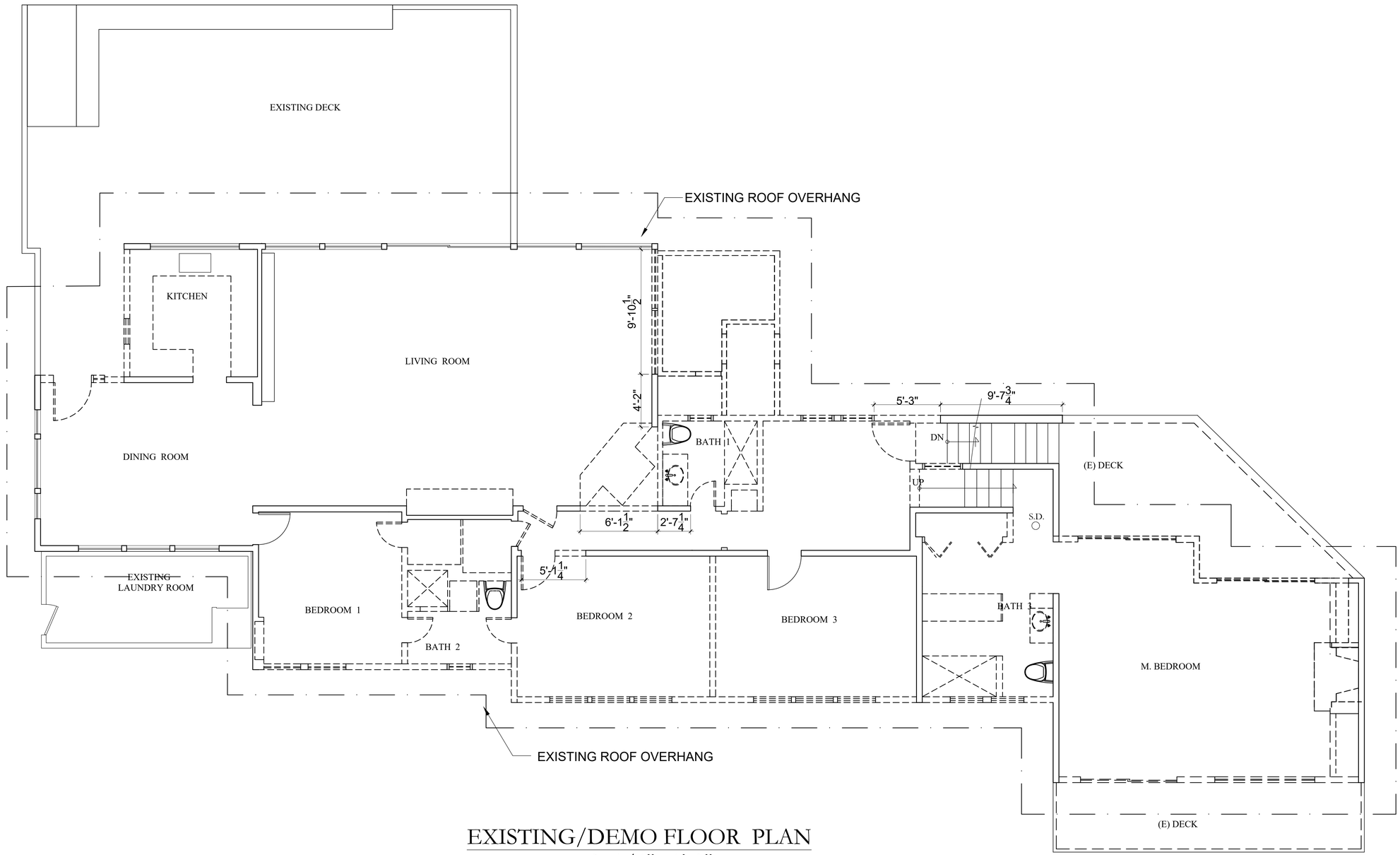
DEMO

LEGEND

EXISTING ROOF OVERHANG

DEMO WALL CALCULATIONS

LINEAR FEET OF EXISTING WALLS	= 499'-8"
LINEAR FEET OF DEMO WALLS	=248'-1"
PERCENTAGE OF DEMO WALLS	=49.8%



EXISTING/DEMO FLOOR PLAN

scale:1/4"=1'-0"

T.M. MORRISON & ASSOCIATES

1910 OUTPOST DRIVE,
LOS ANGELES, CA 90068

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PROJECT NAME

711 SAND POINT ROAD
CARPENTERIA,
CA 93013

REVISIONS:

07.18.2022
10/11/2022

SHEET TITLE

EXISTING / DEMO
FLOOR PLAN

SCALE:
1/4"=1'-0"

DATE FIRST ISSUE:
11.15.2021

SHEET NUMBER:
A-2.0

WALL LEGEND

EXISTING WALL

LEGEND

EXISTING ROOF OVERHANG

PERIMETER WALL OUTLINE

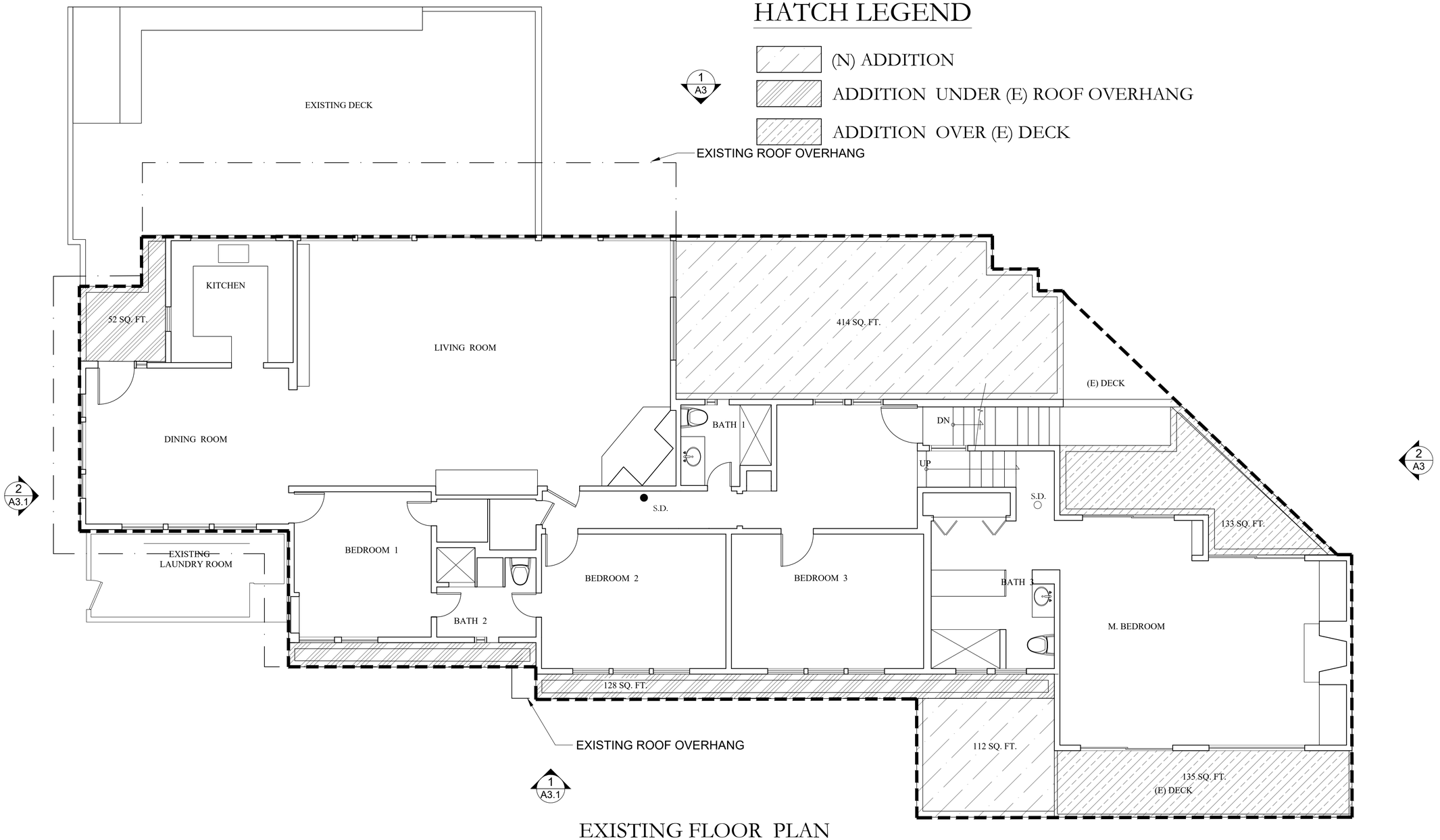
	EXTERIOR WALLS	INTERIOR WALLS
EXISTING RESIDENCE:	2,846.00 SQ. FT.	2711.00 SQ.FT.
ADDITIONS UNDER (E) ROOF:	180.00 SQ. FT.	106.00 SQ.FT.
ADDITION OVER (E) DECK:	268.00 SQ. FT.	220.00 SQ.FT.
ADDITION NEW SQ. FT.:	414.00 SQ. FT.	370.00 SQ.FT.
NEW PROPOSED GROSS RESIDENCE:	3,708.00 SQ. FT.	3407.00 SQ.FT.
NET DIFFERENCE:	862.00 SQ.FT	696.00 SQ.FT.

HATCH LEGEND

(N) ADDITION

ADDITION UNDER (E) ROOF OVERHANG

ADDITION OVER (E) DECK



EXISTING FLOOR PLAN
NEW OVERLAY
scale:1/4"=1'-0"

T.M. MORRISON
& ASSOCIATES
1910 OUTPOST DRIVE,
LOS ANGELES, CA 90068
TEL: 323.512.7700
FAX: 323.378.5289

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PROJECT NAME

711 SAND POINT ROAD ,
CARPENTERIA,
CA 93013

REVISIONS:

07.18.2022
10/11/2022

SHEET TITLE

EXISTING
FLOOR PLAN
NEW OVERLAY

SCALE:
1/4"=1'-0"

DATE FIRST ISSUE:
11.15.2021

SHEET NUMBER:
A-2.1

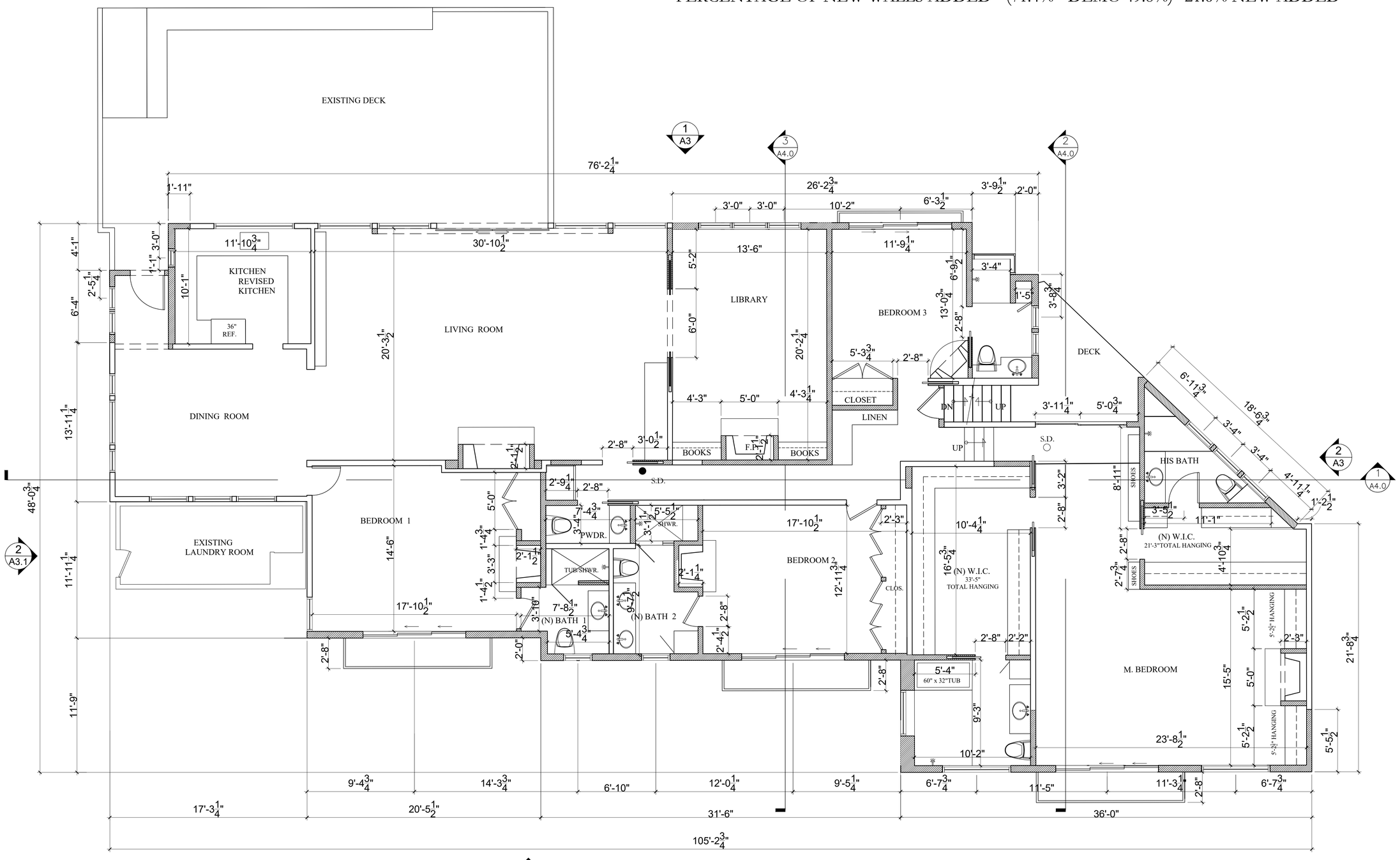
WALL LEGEND

EXISTING WALL

NEW WALL

NEW WALL CALCULATIONS

LINEAR FEET OF EXISTING WALLS = 499'-8"
LINEAR FEET OF NEW WALLS =357'-4"
PERCENTAGE OF NEW WALLS ADDED (71.4% - DEMO 49.8%)=21.6% NEW ADDED



1 A3.1 PROPOSED FLOOR PLAN

scale:1/4"=1'-0"

T.M. MORRISON & ASSOCIATES
1910 OUTPOST DRIVE,
LOS ANGELES, CA 90068
TEL: 323.512.7700
FAX: 323.378.5289

CONSULTANTS

PROJECT NAME

711 SAND POINT ROAD
CARPENTERIA,
CA 93013

REVISIONS:
07.18.2022
10/11/2022

SHEET TITLE

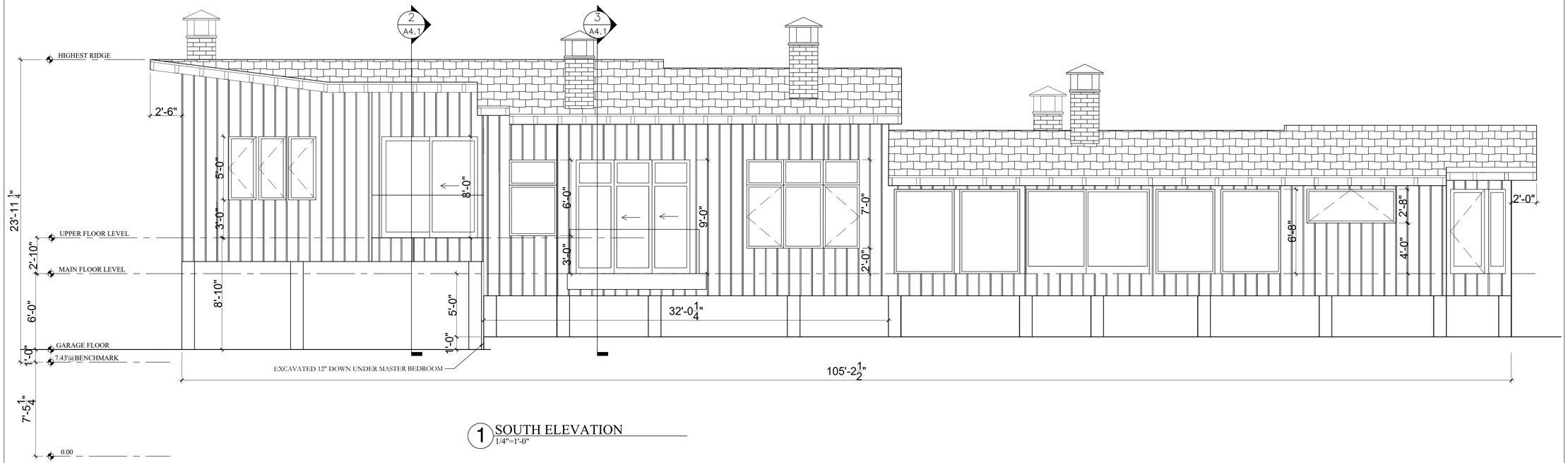
SHEET TITLE

PROPOSED
FLOOR PLAN

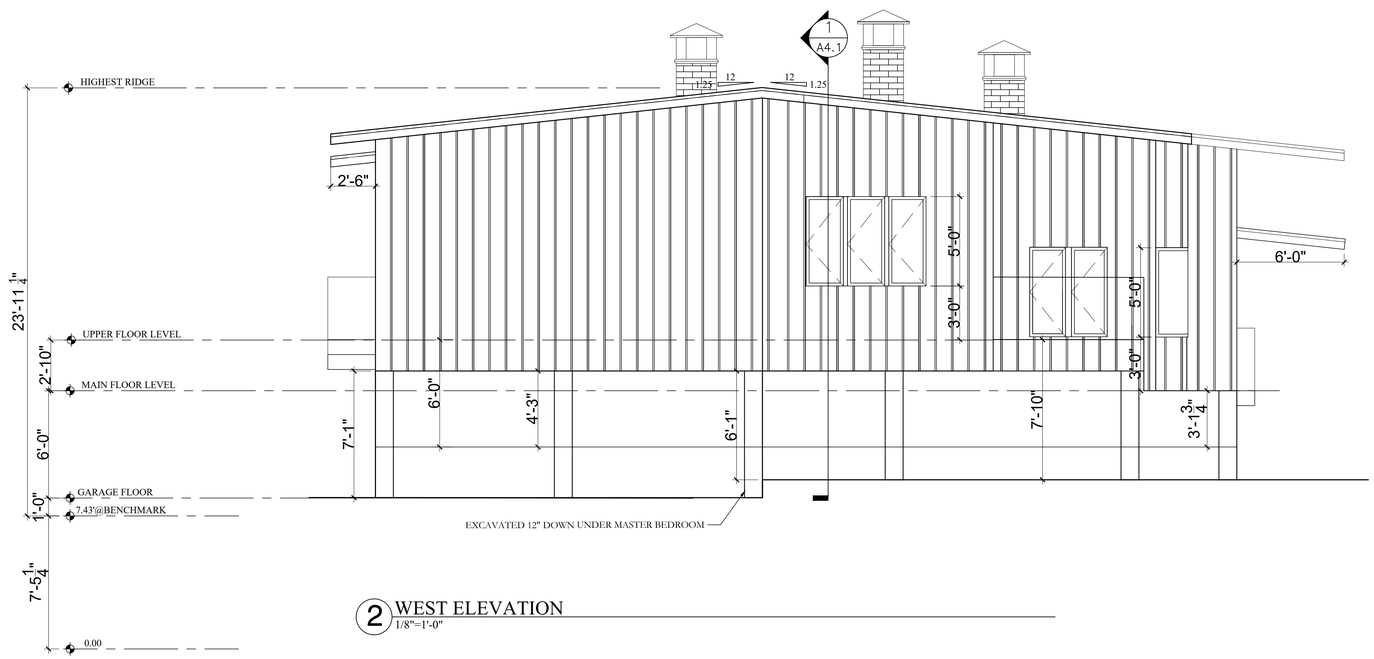
SCALE:
1/4"=1'-0"

DATE FIRST ISSUE:
11.15.2021

SHEET NUMBER:
A-2.2



1 SOUTH ELEVATION
1/4"=1'-0"



2 WEST ELEVATION
1/8"=1'-0"

T.M. MORRISON
& ASSOCIATES
1910 OUTPOST DRIVE,
LOS ANGELES, CA 90068
TEL: 323.512.7700
FAX: 323.378.5289

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PROJECT NAME

711 SAND POINT ROAD
CARPENTERIA,
CA 93013

REVISIONS:
07.18.2022
10/11/2022

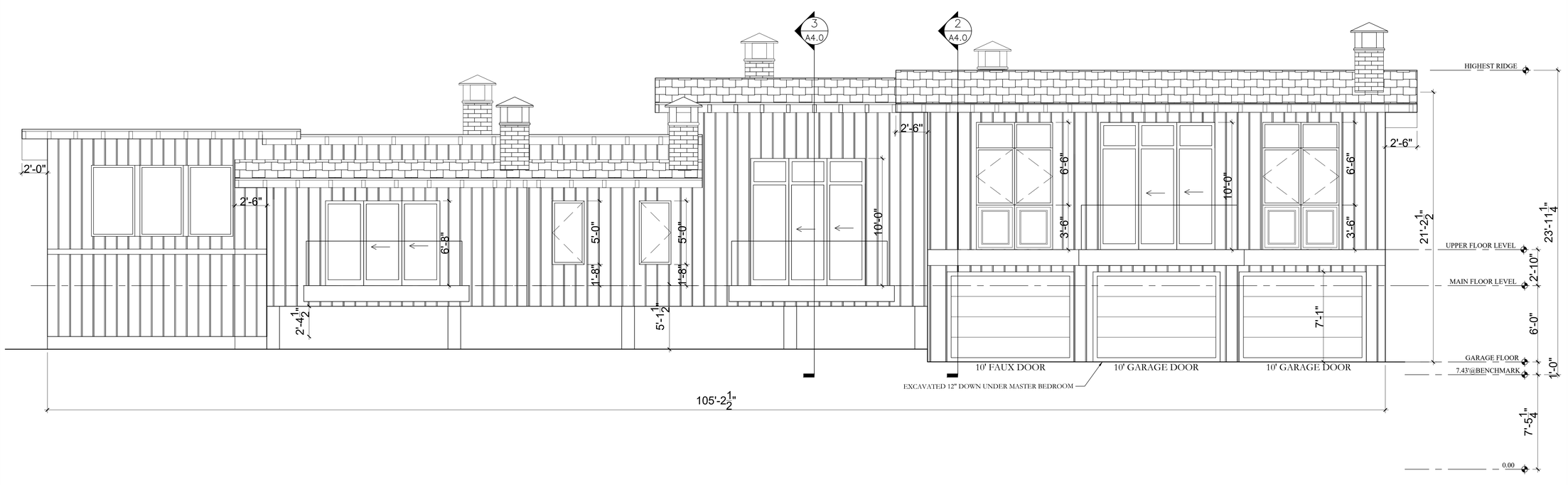
SHEET TITLE

PROPOSED
EXTERIOR
ELEVATIONS

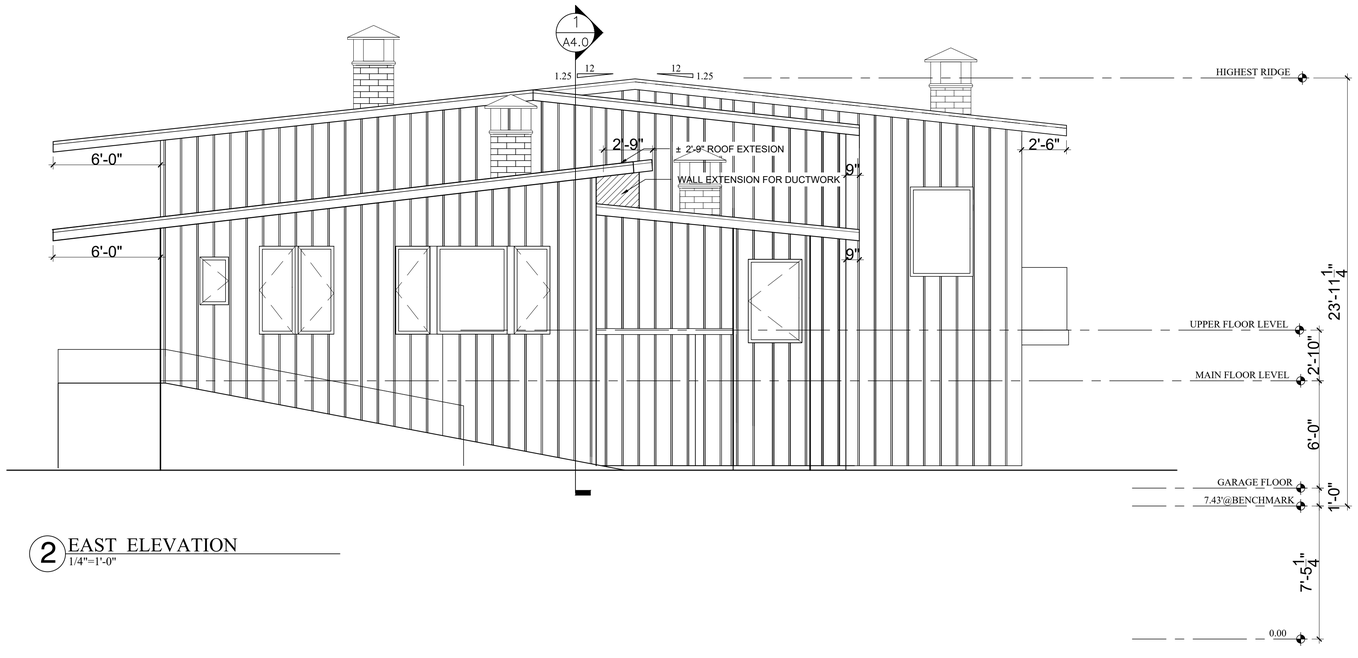
SCALE:
1/4"=1'-0"

DATE FIRST ISSUE:
11.15.2021

SHEET NUMBER:
A-3.0



1 NORTH ELEVATION
3/32"=1'-0"



2 EAST ELEVATION
1/4"=1'-0"

T.M. MORRISON
& ASSOCIATES
1910 OUTPOST DRIVE,
LOS ANGELES, CA 90068
TEL: 323.512.7700
FAX: 323.378.5289

CONSULTANTS

PROJECT NAME

711 SAND POINT ROAD
CARPENTERIA,
CA 93013

REVISIONS:
07.18.2022
10/11/2022

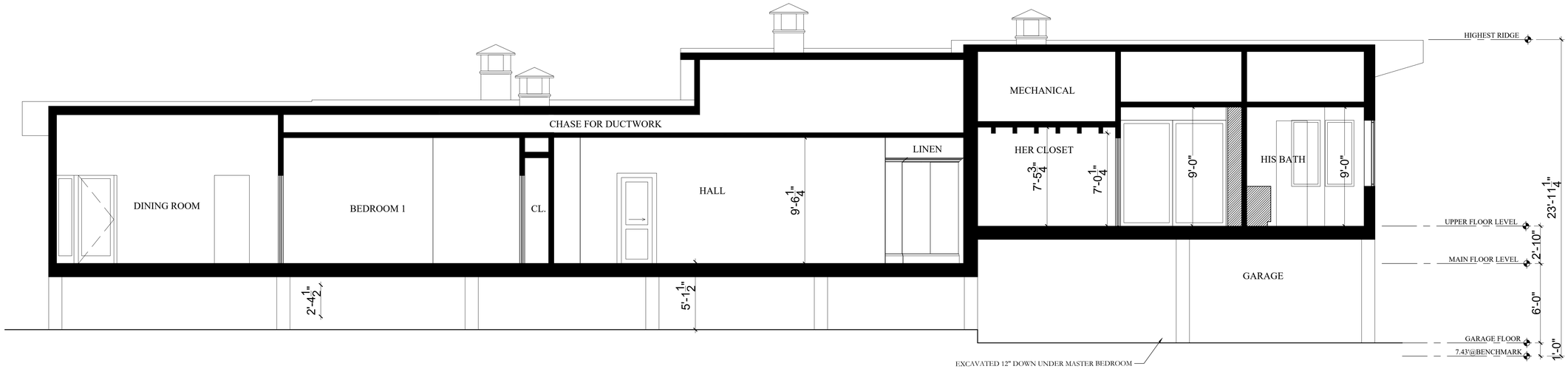
SHEET TITLE

PROPOSED
EXTERIOR
ELEVATIONS

SCALE:
1/4"=1'-0"

DATE FIRST ISSUE:
11.15.2021

SHEET NUMBER:
A-3.1



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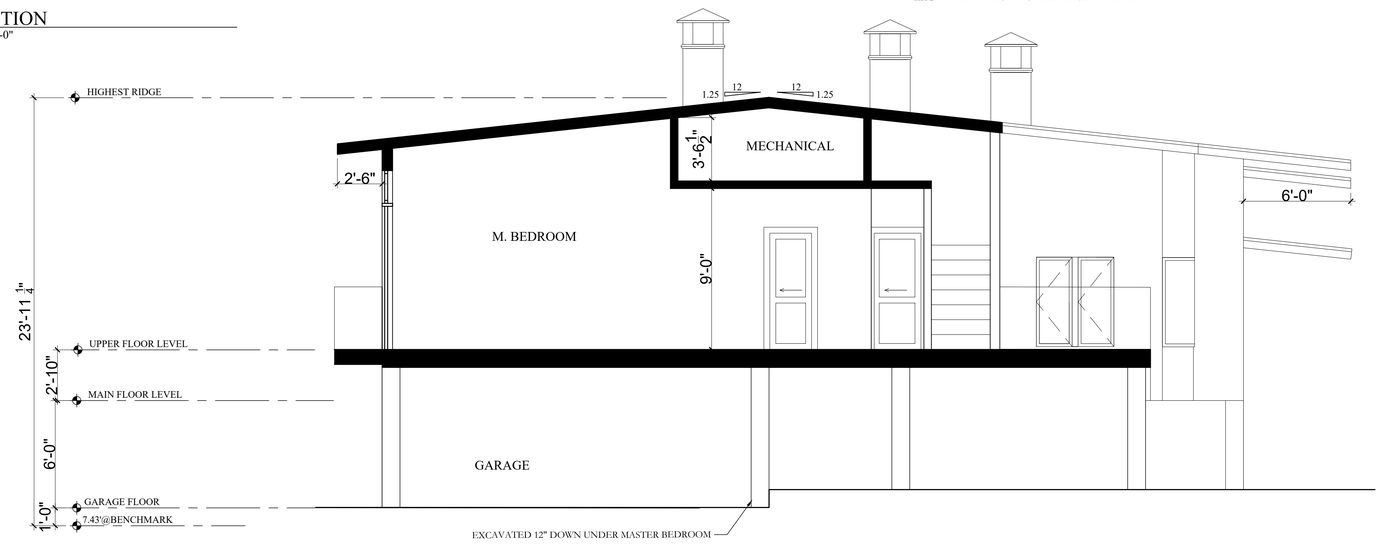

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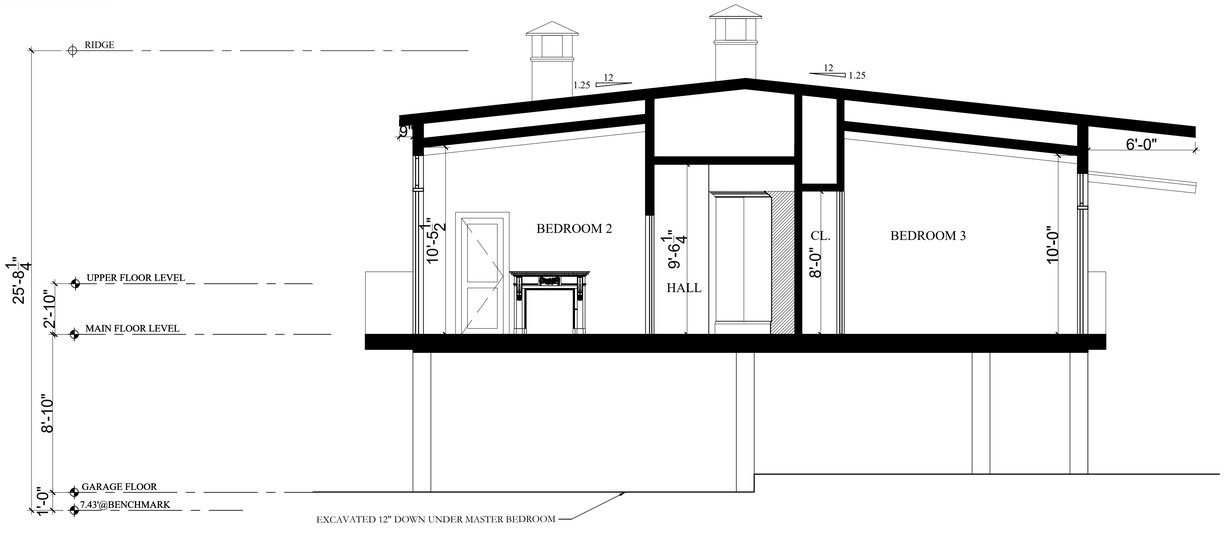


3 SECTION
1/4"=1'-0"

T.M. MORRISON
& ASSOCIATES
1910 OUTPOST DRIVE,
LOS ANGELES, CA 90068
TEL: 323.512.7700
FAX: 323.378.5289

CONSULTANTS

PROJECT NAME

711 SAND POINT ROAD
CARPENTERIA,
CA 93013

REVISIONS:
07.18.2022
10/11/2022

SHEET TITLE

SECTIONS

SCALE:
1/4"=1'-0"

DATE FIRST ISSUE:
11.15.2021

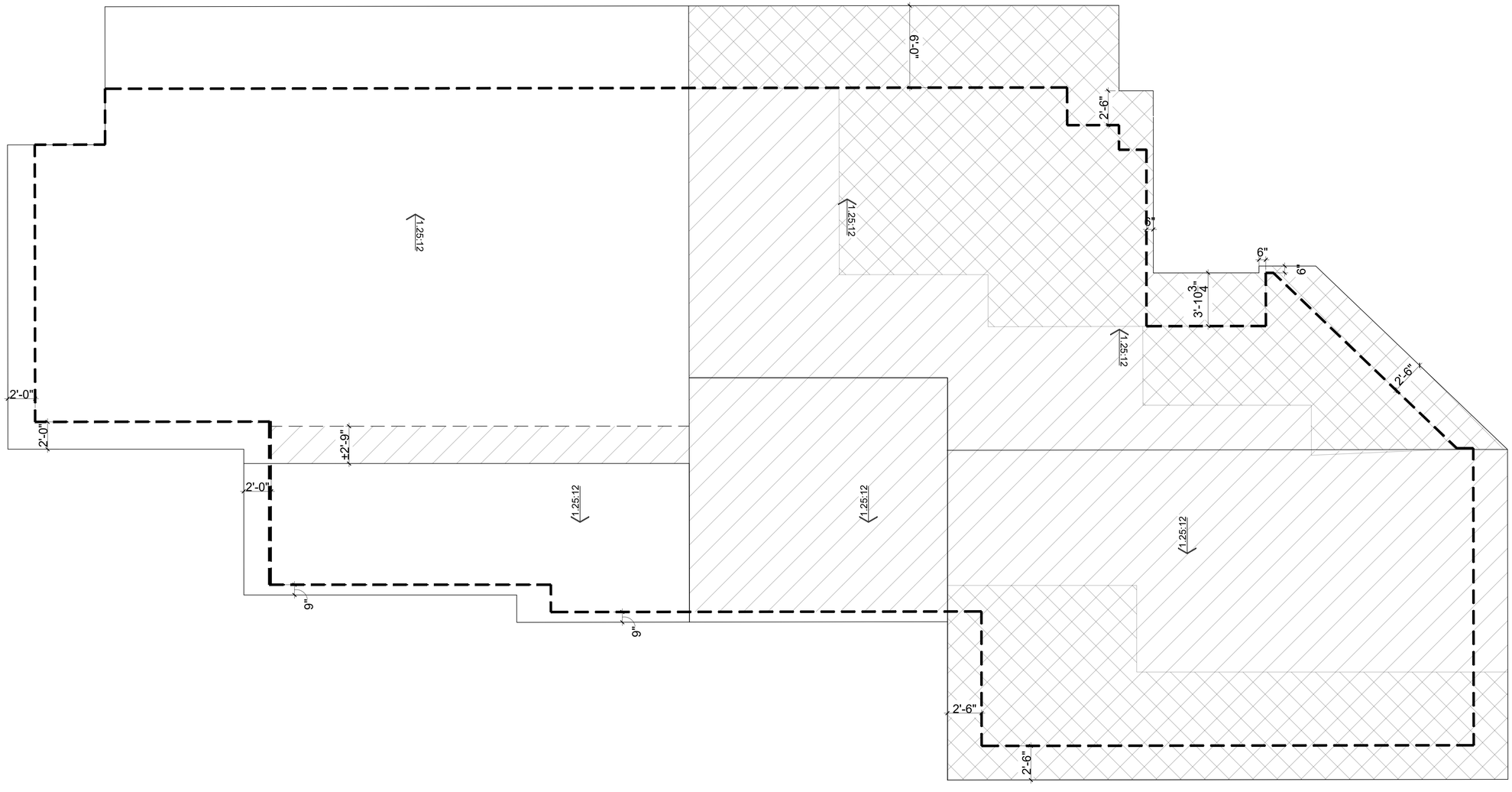
SHEET NUMBER:
A-4.0

ROOF LEGEND

- EXISTING ROOF
- MODIFIED (E) ROOF
- PERIMETER WALL OUTLINE
- (N) ROOF ADDITIONS

ROOF CALCULATIONS

ORIGINAL ROOF SIZE = 3544 SQFT
(E) ROOF TO BE MODIFIED = 1384 SQFT
AMOUNT OF (N) ROOF ADDITIONS = 1177 SQFT
TOTAL AMOUNT OF (N) + (E) ROOF = 4721 SQFT



T.M. MORRISON
& ASSOCIATES
1910 OUTPOST DRIVE,
LOS ANGELES, CA 90068
TEL: 323.512.7700
FAX: 323.378.5289

CONSULTANTS

PROJECT NAME

711 SAND POINT ROAD
CARPENTERIA,
CA 93013

REVISIONS:

10.10.2022
10/11/2022

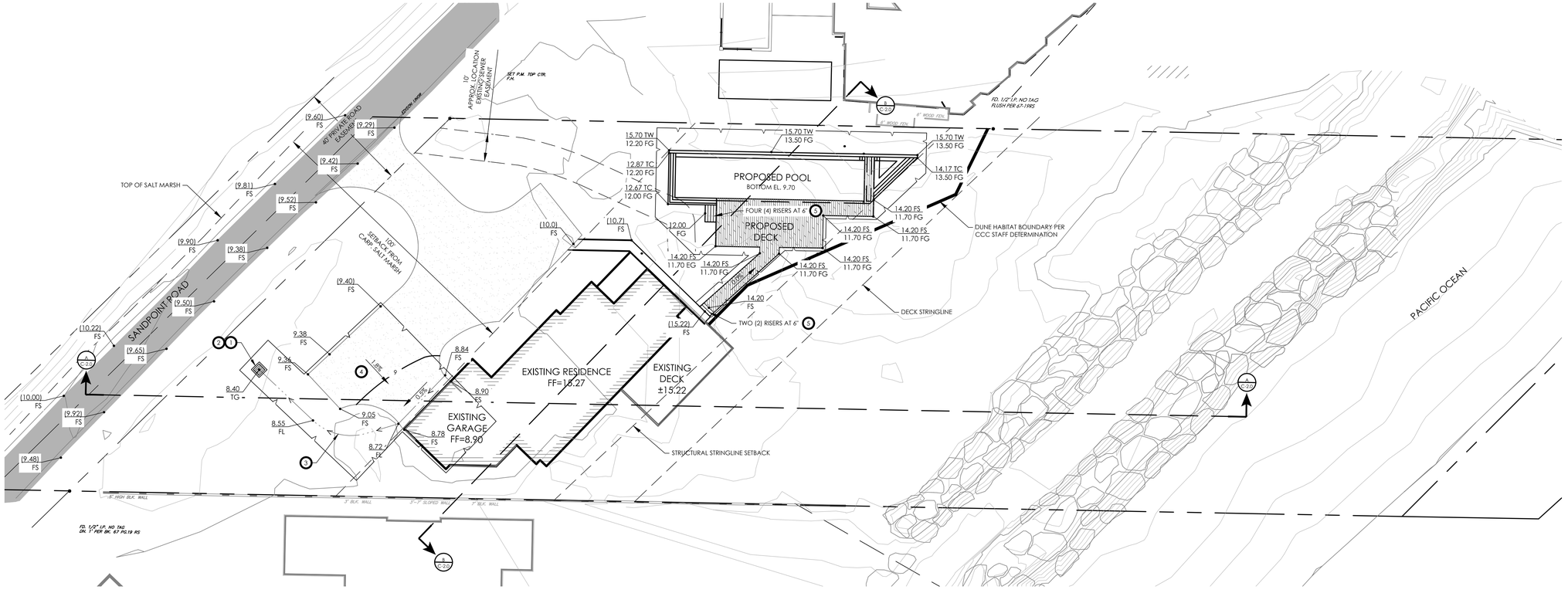
SHEET TITLE

ROOF
CALCULATIONS

SCALE:
1/4"=1'-0"

DATE FIRST ISSUE:
11.15.2021

SHEET NUMBER:
A-5.0



CONSTRUCTION NOTES

1. PROPOSED INFILTRATION CATCH BASIN DETAIL 'A', FLOW WELL OR APPROVED EQUAL.
2. PROPOSED 6" RISER AND 12" ATRIUM GRATE.
3. PROPOSED DRAINAGE SWALE.
4. PROPOSED GRAVEL DRIVEWAY.
5. PROPOSED STAIRS PER PLAN.

LEGEND

PROPOSED FLOWLINE	
170	EXISTING CONTOUR
170	PROPOSED CONTOUR
EG	EXISTING GRADE
FS	FINISH SURFACE
FG	FINISH GRADE
TW	TOP OF WALL
	PROPOSED WOODEN DECK
	EXISTING ASPHALT PAVEMENT
	PROPOSED GRAVEL DRIVEWAY
	PROPERTY LINE
FM	EXISTING FORCE MAIN
W	EXISTING WATER MAIN
G	EXISTING GAS
E	EXISTING ELECTRICAL
	LIMIT OF GRADING

GENERAL NOTES

1. ALL EXISTING UNDERGROUND UTILITY INFORMATION SHOWN IS GATHERED FROM BEST AVAILABLE SOURCES. ACCURACY OF HORIZONTAL AND VERTICAL INFORMATION MAY NOT BE PRECISE.
2. SEE ALTA SURVEY FOR ALL EXISTING EASEMENT INFORMATION.
3. SEE ARCHITECTURAL DRAWINGS FOR WALL AND DECK MATERIALS.

EARTHWORK

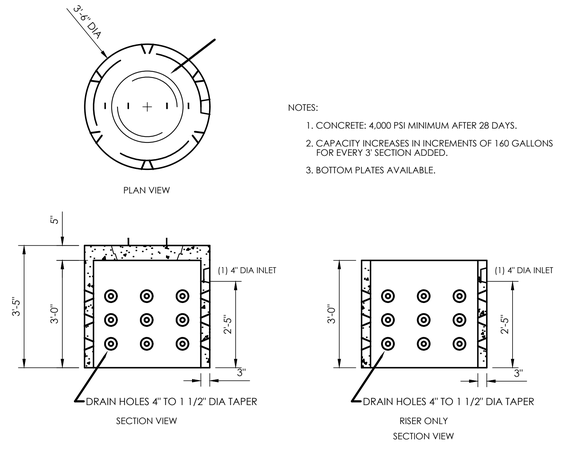
AREA OF DISTURBANCE 0.2 AC±

RAW CUT - POOL: 240 CY
RAW FILL - POOL: 30 CY

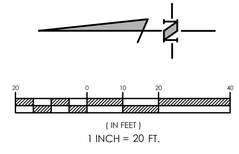
RAW CUT - SITE: 140 CY
RAW FILL - SITE: 10 CY

QUANTITY ESTIMATES ON THESE PLANS ARE TO BE USED FOR PERMIT PURPOSES ONLY. IT IS THE RESPONSIBILITY OF THE CONTRACTOR TO VERIFY ACTUAL QUANTITIES FOR THE PURPOSE OF CONSTRUCTION.

THE RAW EARTHWORK QUANTITIES SHOWN HEREON REPRESENT THE ESTIMATED VOLUMETRIC DIFFERENCE BETWEEN THE PROPOSED ROUGH GRADE AND THE LIMITED TOPOGRAPHIC EXISTING GRADES. THESE ESTIMATES DO NOT MAKE CONSIDERATIONS FOR LOSSES OR BULKING DUE TO: SHRINKAGE, SOIL AMENDMENTS, STABILIZATION, CONSTRUCTION TECHNIQUE, FOOTING & TRENCHING SPOILS, ETC. THESE, IN ADDITION TO ACTUAL FIELD CONDITIONS, CONSTRUCTION TECHNIQUE AND THE FINAL RECOMMENDATIONS OF THE SOILS ENGINEER MAY SIGNIFICANTLY EFFECT THE FINAL IMPORT/EXPORT QUANTITIES.



A DRYWELL DETAIL — NTS



rrm design group
rrmdesign.com | (805) 963-8283
10 EAST FIGUEROA STREET, SUITE 200
SANTA BARBARA, CA 93101

CONSULTANT

AGENCY

711 SAND POINT ROAD
CARPINTERIA, CA, 93013

GRADING AND DRAINAGE PLAN

NO.	REVISION	DATE

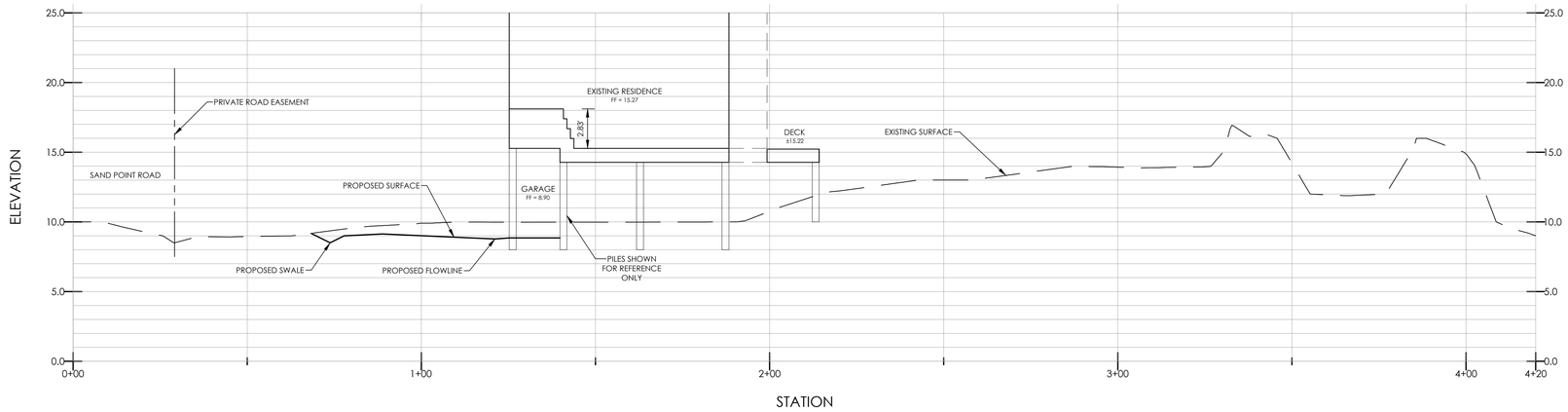
PROJECT MANAGER
MCH

DRAWN BY	CHECKED BY
JMR	MCH

DATE
OCTOBER 7, 2022

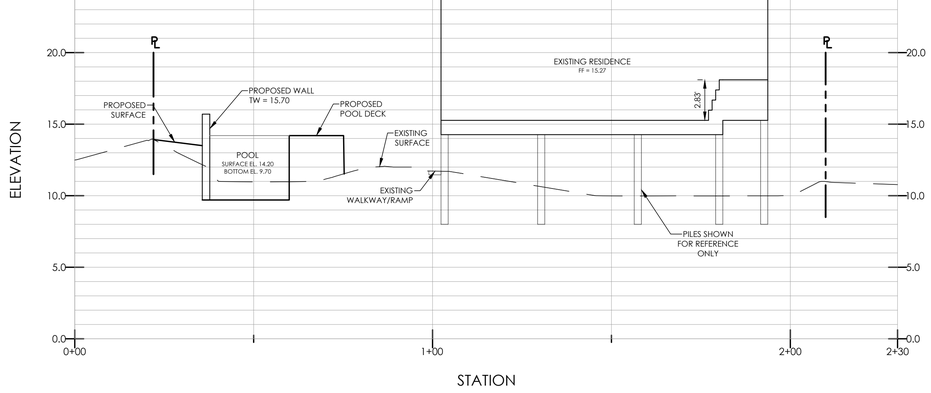
PROJECT NUMBER
0177-01-IN15

SHEET
C-1.0



SECTION 'A-A'

HORIZONTAL SCALE 1"=20'
VERTICAL SCALE 1"=5'



SECTION 'B-B'

HORIZONTAL SCALE 1"=20'
VERTICAL SCALE 1"=5'

rrm design group
rrmdesign.com | (805) 963-8283
10 EAST FIGUEROA STREET, SUITE 200
SANTA BARBARA, CA 93101

CONSULTANT

AGENCY

711 SAND POINT ROAD
CARPINTERIA, CA, 93013

SITE SECTIONS

NO.	REVISION	DATE
1		
2		
3		
4		
5		
6		

PROJECT MANAGER
MCH

DRAWN BY	CHECKED BY
JMR	MCH

DATE
OCTOBER 7, 2022

PROJECT NUMBER
0177-01-IN15

SHEET
C-2.0

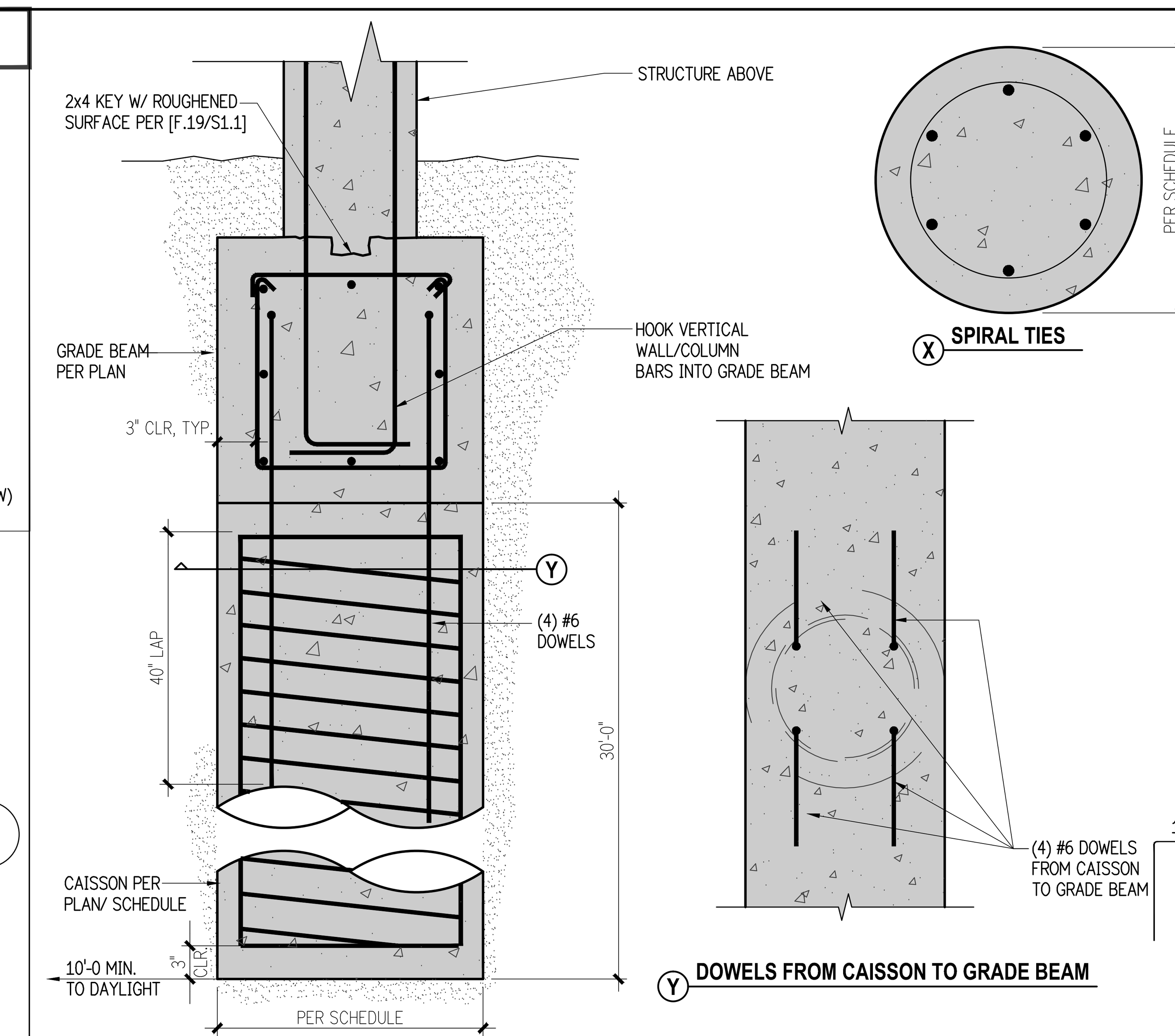
SYMBOLS LEGEND

- EXTENTS OF (N) FOOTINGS	- POST ABOVE
- (E) FOOTINGS	- 4x4 POST
- 2x4 STUD WALLS	- 4x6 POST
- 2x6 STUD WALLS	- 6x6 POST
- WALL ABOVE	- HOLDOWN AS NOTED
- WALL ABOVE	- STRAP AS NOTED
- "CALIFORNIA" FRAMING	- STEP IN SLAB
- ROOF OR FLOOR JOIST (AS NOTED)	- (E) ROUND TIMBER PILES — DIAM IN INCHES OF EA. TIMBER PILE (VARIES PER PLAN BELOW)
- WOOD BEAM	
- SHEAR WALL PLYWOOD	

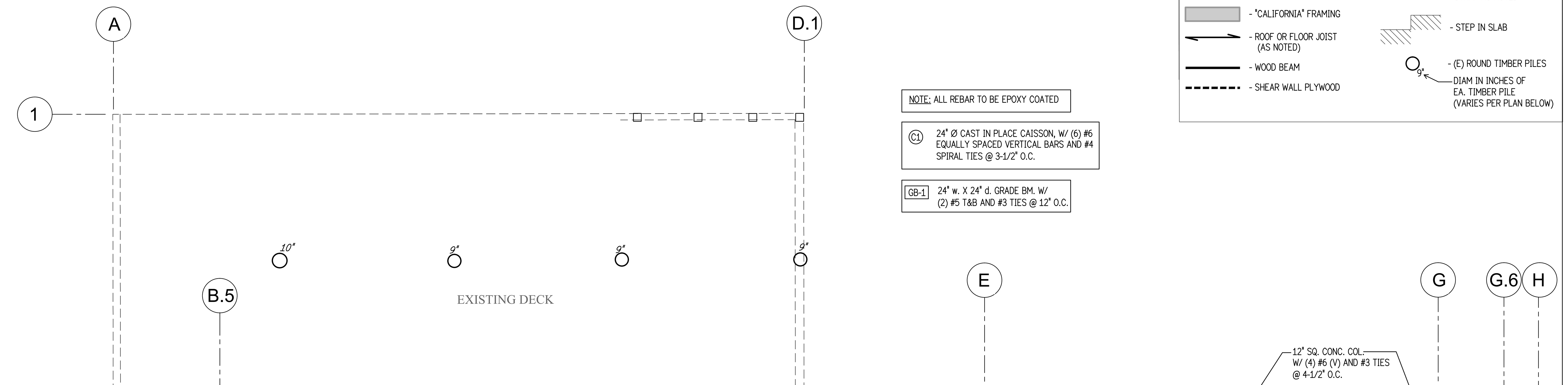
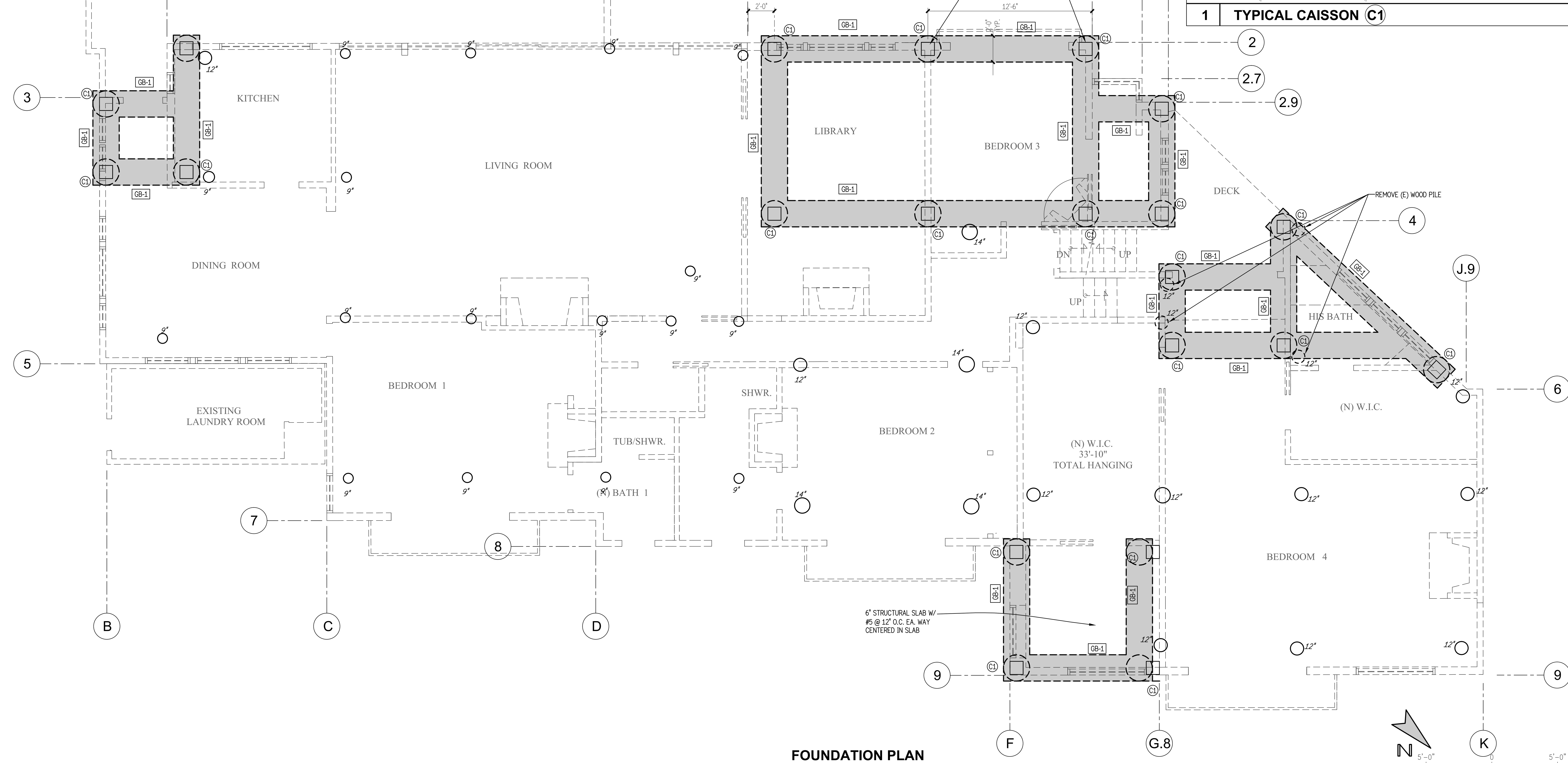
NOTE: ALL REBAR TO BE EPOXY COATED

C1 — 24" Ø CAST IN PLACE CAISSON, W/ (6) #6 EQUALLY SPACED VERTICAL BARS AND #4 SPIRAL TIES @ 3-1/2" O.C.

GB-1 — 24" w. X 24" d. GRADE BM. W/ (2) #5 T&B AND #3 TIES @ 12" O.C.



1 TYPICAL CAISSON C1 — 1" = 1'-0"

FOUNDATION PLAN — 1/4"=1'-0"

T.M. MORRISON & ASSOCIATES
1910 OUTPOST DRIVE, LOS ANGELES, CA 90068
TEL: 323.512.7700
FAX: 323.378.5289

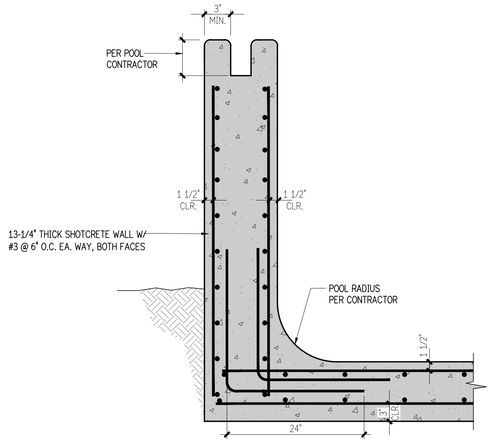
Doyle-Morgan Structural Engineering, Inc.
2040 Alameda Padre Serra, Suite 101
Santa Barbara, CA 93103
Phone: (805) 569-1134
mjones@doyle-morgan.com

711 SAND POINT ROAD
CARPENTERIA, CA 93013

FOUNDATION PLAN

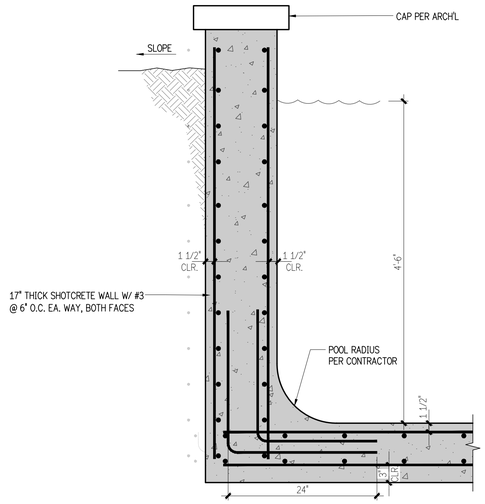
Date	10/24/22
Scale	As Noted
Drawn	J.R.
Job Number	2022007
Sheet	S3.1

Tue. Oct 25, 2022 – 3:27pm



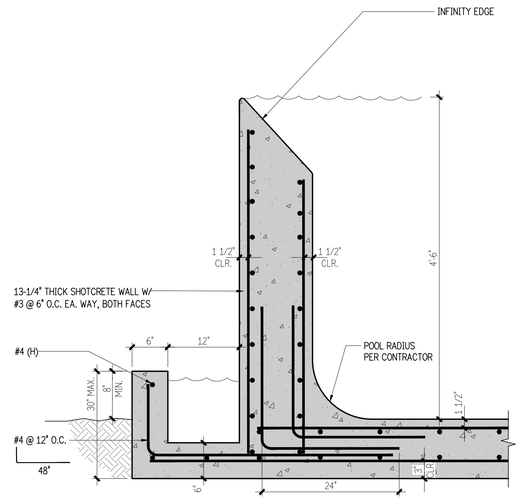
1C SECTION AT POOL

1" = 1'-0"



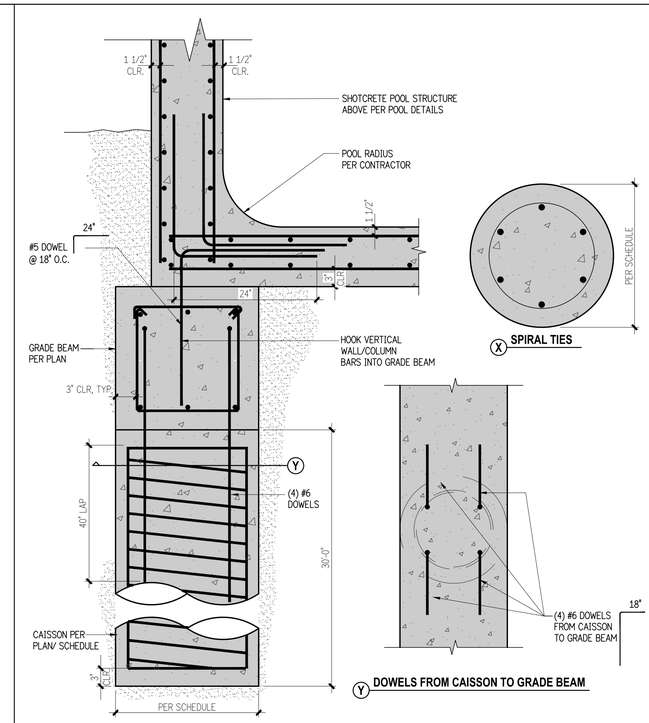
1B SECTION AT POOL

1" = 1'-0"



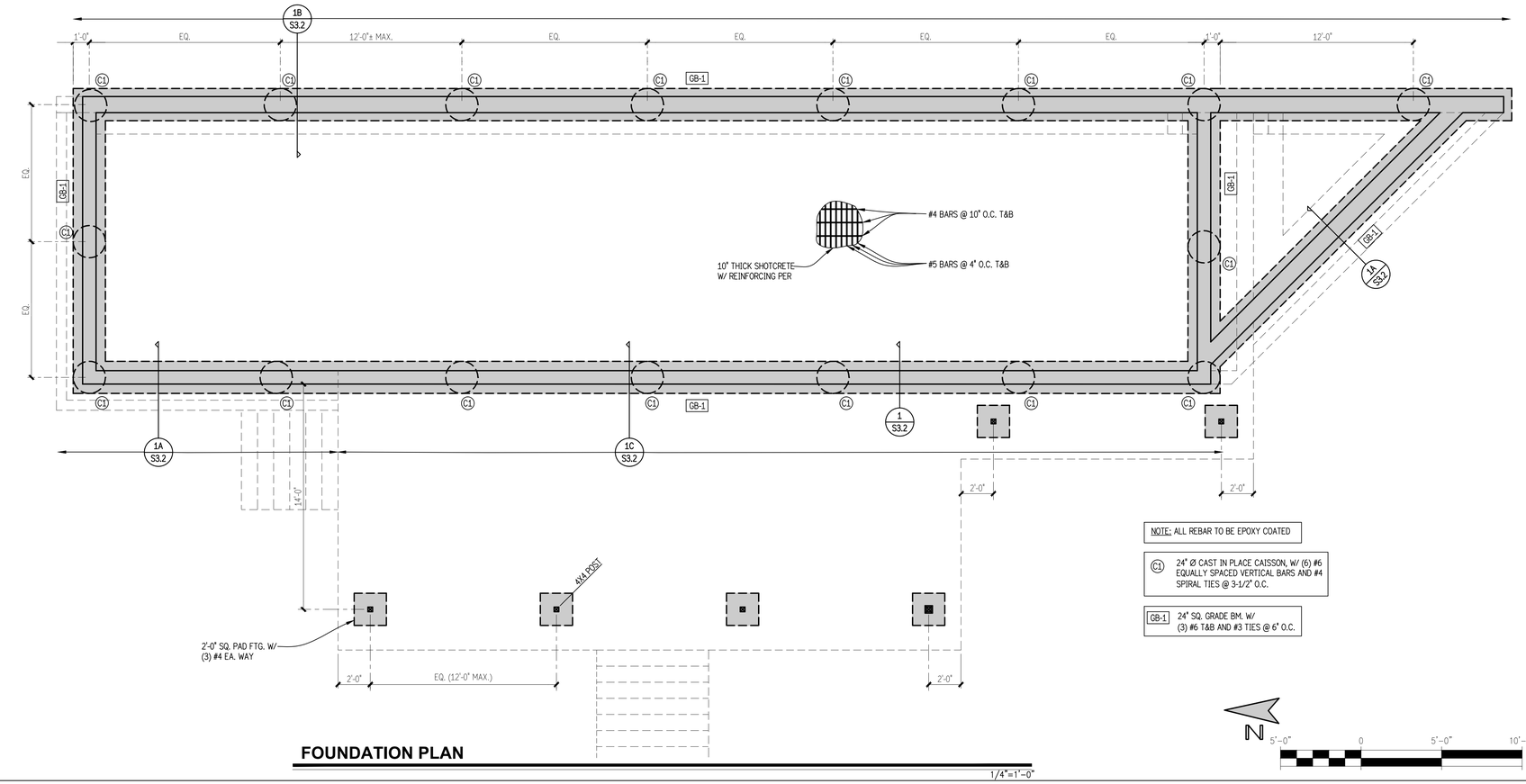
1A SECTION AT INFINITY FACE

1" = 1'-0"



1 TYPICAL POOL CAISSON AND GRADE BEAM C1

1" = 1'-0"



FOUNDATION PLAN

1/4"=1'-0"

T.M. MORRISON & ASSOCIATES
1910 OUTPOST DRIVE,
LOS ANGELES, CA 90068
TEL: 323.512.7700
FAX: 323.378.5289

REGISTERED PROFESSIONAL ENGINEER STRUCTURAL EXP: 06/30/23 STATE OF CALIFORNIA

Doyle-Morgan Structural Engineering, Inc.
2040 Alameda Padre Serra, Suite 101
Santa Barbara, CA 93103
Phone: (805) 569-1134
mjones@doyle-morgan.com

711 SAND POINT ROAD
CARPENTERIA, CA 93013

POOL FOUNDATION PLAN

Date	09/27/22
Scale	As Noted
Drawn	J.R.
Job Number	2022007
Sheet	S3.2

Tue, Sep 27, 2022 - 8:33am

CALIFORNIA COASTAL COMMISSION
SOUTH CENTRAL COAST DISTRICT OFFICE
89 SOUTH CALIFORNIA STREET, SUITE 200
VENTURA, CA 93001-2801
VOICE (805) 585-1800
FAX (805) 641-1732
WWW.COASTAL.CA.GOV

M E M O R A N D U M

FROM: Jonna D. Engel, Ph.D., Environmental Program Manager

TO: Michelle Kubran, Coastal Program Analyst

SUBJECT: ESHA Determination for 711 Sand Point Road, Carpinteria, CA.

DATE: June 7, 2021

Documents Reviewed:

MRS Environmental, Inc. January 25, 2012. Biological Resources ESHA Determination for Residential Property at 711 Sand Point Road, Carpinteria, California. Prepared for: Sarah Argyropoulos c/o Laurel Perez, Principal Planner.

Padre Associates, Inc. January 2021. Biological Resources Assessment 711 Sand Point Road Residential Development, Carpinteria, California. Prepared for: Sarah Argyropoulos

Storrer Environmental Services LLC. August 2018. Biological Resources Assessment for 711 Sand Point Road (APN 005-460-046) Santa Barbara County, California. Prepared for: Suzanne Elledge Planning & Permitting Services, Inc.

Appeal No.: A-4-STB-19-0214. February 13, 2020. Appellants: Commissioner Wilson and Commissioner Brownsey. Local Government: County of Santa Barbara. Local Decision: Coastal Development Permit (No. 17CDH-00000-00014) approved with conditions by the Planning Commission on November 7, 2019.

Coastal Commission Comment Letter. August 19, 2019. Draft Mitigated Negative Declaration for the Cosmledo Trust New Residence at 711 Sand Point Road (19NGD-00000-00008, 17CDH-00000-00014). Sent to Sean Stewart, Planner, Santa Barbara County Planning & Development.

Exhibit 5
Jonna D. Engel, Ph.D., Environmental Program Manager - ESHA Determination Memorandum
Appeal No. A-4-STB-19-0214

I have examined the natural resources at 711 Sand Point Road in Carpinteria, California (APN 005-460-046) to determine if the site supports environmentally sensitive habitat (ESHA). The subject parcel encompasses approximately 6.30 acres within the Carpinteria 7.5-minute United States Geological Survey (USGS) quadrangle. The residential portion of the parcel consists of 1.4 acres straddled between Carpinteria Marsh to the northeast and the Pacific Ocean to the southwest. I have reviewed the three biological resource assessments prepared for the site, conducted a California Department of Fish & Wildlife (CDFW) Natural Diversity Database (CNDDB) query, and examined aerial photos. I also visited the site on June 9, 2020, with Coastal Commission staff, the applicant's agent, and one of the applicant's consulting biologists, to study the on-site conditions for making an ESHA determination and delineation.

The 2018 Storrer Environmental Inc. LLC Biological Resources Assessment ("Storrer Report") reported that the soil types on the residential area of the site are almost equal halves BE or beach sand and AC or Aquent fill soil (Figure 1). The Storrer report found that the vegetation types include a small 0.024 acre patch of salt grass (*Distichlis spicata*) on a berm between Sand Point Road and Carpinteria Marsh and a 0.48-acre area of primarily sandy substrate dominated by non-native invasive iceplant mats (Figure 2). The berm was surveyed for hydric soils, hydrology, and hydrophytic vegetation. The berm did not support hydric soils, had no evidence of hydrology, and was dominated by salt grass, a species with a facultative (FAC) wetland status that means it has an equal likelihood of occurring in non-wetland and wetland areas[1]. The Storrer Report determined that the salt grass berm was not a wetland and that the residential area of the subject property did not support wetland habitat.

The Storrer Report described the sandy substrate as supporting iceplant mats comprised of highway iceplant (*Carpobrotus edulis*) and sea fig (*Carpobrotus chiliensis*) totaling approximately 60 percent relative cover and two native dune species, beach bur (*Ambrosia chamissonis)* and beach evening primrose (*Camissoniopsis cheiranthifolia ssp. cheiranthifolia*) totaling approximately 15 percent cover (Figure 3). The Storrer Report documented one special status plant species among the iceplant mats, beach bur, and beach evening primrose; an individual red sand verbena (*Abronia maritima*) which is a native dune species identified by the California Native Plant Society (CNPS) as having a 4.2 rarity status[2]. The Storrer Report concluded that there were no special status wildlife species observed in the survey area, that none were expected to occur and that "there is no ESH in the survey area" based on the dominance of iceplant mats.

Padre Associates Inc. biologists conducted a desktop review followed by a one-day field survey of the site on January 7, 2021, that focused on mapping vegetation types, collecting vegetation data, and the presence/absence of special status plant and wildlife species. In the two and a half years between the Storrer Report and the Padre Associates Inc. Biological Assessment ("Padre Assessment"), the cover of iceplant mats

[1] A FAC wetland indicator status means that a plant has a 34 to 66 percent likelihood of occurring in non-wetlands as in wetlands.
[2] https://www.cnps.org/rare-plants/cnps-rare-plant-ranks

increased and the cover of native dune species decreased as seen in photographs and as documented by the Padre Assessment (Figure 4, Storrer Report vs. Figure 5, Padre Assessment). While the Storrer Report estimated that the area between the house and ocean was characterized by 60 percent relative cover of iceplant mats and 15 percent relative cover of native dune plants, the Padre Assessment surveyed one area (AOI 1) and measured over 80 percent relative cover of iceplant mats and nine percent relative cover of beach evening primrose. The Padre Assessment states that "Isolated patches within the Ice plant mats were observed to support different assemblages of native and non-native plants, however, through quantitative and qualitative sampling, it was determined that ice plants remained dominant and the areas were representative of Ice plant mats". The Padre Assessment found that the area with iceplant mats met the membership rules of *A Manual of California Vegetation, Second Edition*[3] (MCV2) for Ice plant mats (*Carpobrotus edulis* or Other Ice Plants Semi-Natural Herbaceous Stands) that have a 'High' invasive ranking by Cal-IPC, are not a rare habitat type, and therefore the Padre Assessment concluded do not meet the definition of ESHA.

The Padre Assessment did not record any sensitive plants or animals on the site and reported that there was no evidence of globose dune beetles (*Coelus globosus*) or silvery legless lizards (*Anniella pulchra*) and that these two species were not expected to occur at the site. However, no protocol level plant or animal surveys were performed[4]. Globose dune beetles have a rarity ranking of G1G2 S1S2[5] and are commonly found beneath foredune vegetation. A population of globose dune beetle has been mapped in Carpinteria along the beach in the foredunes and sand hummocks[6]. The silvery legless lizard has a rarity ranking of G3 S3[7] and is a California Species of Special Concern. It is a burrowing lizard that looks like a snake, having adapted to a legless condition to allow it to live a subterranean life in loose, sandy soil. In dunes, legless lizards are typically associated with shrubs and leaf litter that provide refuge and insect prey. It is my professional opinion that both of these species could occur on the site; I have reviewed reports of globose dune beetles in southern foredune habitat dominated by iceplant mats and I have dug for and found silvery legless lizards in such habitat.

---

[3] Sawyer JO, T Keeler-Wolf and JM Evens. 2009. A Manual of California Vegetation, Second Edition. Sacramento, California: California Native Plant Society Press. 1300 pp.

[4] None of the three biological resource assessments conducted for the subject property included protocol level surveys for sensitive plants or animals.

[5] Global (G) and State (S) Level 1 communities or species are identified as "critically imperiled = at very high risk of extinction due to extreme rarity (often <5 populations), very steep declines, or other factors". Global (G) and State (S) Level 2 communities and species are identified as "imperiled = at high risk of extinction or elimination due to restricted range, few populations or occurrences (often < 20), steep declines, severe threats, or other factors.

[6] California Department of Fish and Wildlife, California Natural Diversity Database (CNDDB) 2021. Natural Heritage Division. Sacramento, California. Available online at: http://www.dfg.ca.gov/biogeodata/cnddb/

[7] Global (G) and State (S) Level 3 communities and species are identified as "vulnerable = at moderate risk of extinction due to a restricted range, relatively few populations (often <80), recent and widespread declines, or other factors".

MRS Environmental, Inc. (MRS) conducted a reconnaissance-level survey and habitat assessment on the residential area of 711 Sand Point Road on January 12, 2021, to determine if the property supported ESHA. MRS identified 0.5 acres of iceplant mat habitat on the site and stated "Within the residential portion of the property, the iceplant mats land cover type supports a mix of plant species and sandy soil that are common in dune habitats along the coast, including dune habitats that have been designated ESHA in the County's CLUP such as the Devereux Dunes, 20 miles west, and Point Sal, 70 miles northwest". MRS found that much of the iceplant mats/dune habitat at 711 Sand Point Road supports greater than 50 percent vegetative cover of iceplant (Figure 6). MRS goes on to state that "There are some areas on the site where the iceplant mats are more open and dune plant species provide greater cover, such as adjacent to the rock revetments where the red sand verbena was found, but iceplant remained dominant in this area". MRS concluded that the iceplant mat area did not rise to the level of ESHA for several reasons including that the iceplant mat habitat is not rare, does not support rare species[8], and is limited in function, value, and productivity because of its small size.

During the June 9, 2020 site visit, I examined the small patch of salt grass on the berm at the edge of the residential area and Carpinteria Marsh. Based on my observations and the Storrer Report wetland survey results, I concur that this is not wetland habitat and that the residential area does not support wetlands. I observed that the area of the residential site between the house and the beach supported sandy substrate that transitioned into more organic soil (at the break between BE and AC soil identified on the soil map (Figure 1)) with hummocks and hollows characteristic of foredune morphology[9]. The dominant vegetation is iceplant mats interspersed with two native foredune species, beach bur and beach evening primrose, as reported by all three biological assessments.

My observations of the percent relative cover of vegetation in the area between the house and the ocean align best with the Storrer report. Iceplant mats were the dominant cover but the native beach bur and beach evening primrose were also significant components of the habitat. I concur with Storrer's estimate of iceplant mats having approximately 60 percent relative cover and the native dune species having approximately 15 percent relative cover (see Figure 3 and Figure 7 photos from Storrer Report and June 9, 2020 site visit, respectively). The beach bur was conspicuously located on the tops of dune hummocks (Figure 7) and there was a lot of beach evening primrose immediately behind the house (Figure 8). There were also patches of bare sand interspersed throughout (Figure 9). Strangely, just six months after the June 9, 2020 site visit, photos taken and observations made by both Padre Associates Inc. and MRS Environmental Inc. depict and note far less patches of both beach bur and beach evening primrose in the iceplant mat area (Compare Figures 3, 7, 8, & 9 with Figures 4, 5, & 6).

[8] As stated earlier, none of the three biological reports conducted protocol level surveys for sensitive plants or animals therefore their presence can not be categorically ruled out.

[9] While the soil map (Figure 1) depicts a distinct line between BE soil (sand) and AC soil (fill) I observed a gradual transition between the two soil types.

None of the biological consultants performed focused surveys for globose dune beetles or silvery legless lizards, sensitive species found in foredunes that I believe could inhabit this area. Furthermore, there is sandy substrate in this area and there was no analysis provided in any of the biological reports regarding whether dune morphology was present in the iceplant mat area.

Dune-backed beaches account for roughly a quarter of California's shoreline but together, beach-dune complexes constitute only 2-3% of the State's landmass[10], making them one of the State's rarest landscapes. Positioned along continental margins, where the land and sea meet, intact beach and dune systems are among the rarest ecosystems on earth. There are numerous reasons for this. Coastlines are highly desirable areas for agriculture, industry, tourism, recreation, cities, and residential development[11], and in many littoral cells[12] the natural supply of sand for beaches and dunes is broken or impaired[13]. Added to this suite of impacts are rising sea levels[14]. One result is coastal squeeze[15], where many beach and dune systems have either been completely lost or have become a shadow of their former selves. For the remaining beach and dune systems in developed areas, many have become highly fragmented, invaded by non-natives, and sand supply and transport have been interrupted.

Where they do occur, coastal dunes are characterized by their sandy substrate, topographical features such as hummocks, hollows, and ridges, and uniquely adapted vegetation communities. Foredunes occur in the narrow band between the beach, and when unencumbered, transition to back dune scrub habitat that generally supports a more diverse plant community. The seaward face of foredunes may exceed 50% vegetation cover[16]. Foredunes from Point Conception to the Mexican Border are identified as southern foredunes by Holland[17]. Characteristic species include beach bur, beach evening primrose, salt grass, red sand verbena and non-native iceplant which are all found at 711 Sand Point Road. Additional species common in southern foredunes are sand verbena (*Abronia umbellata*), salt bush (*Atriplex leucophylla*), and

[10] Pickart AJ and MG Barbour. 2007. Beach and Dune. In: MG Barbour, T Keeler-Wolfe and AH Schoenherr (Eds.), *Terrestrial Vegetation of California* (pp. 155-179). Berkeley, California: UC Press.

[11] Nordstrom KF and NP Psuty. 1980. Dune district management: a framework for shorefront protection and land use control. Coastal Management 7: 1-23.

[12] A littoral cell is a coastal compartment that contains a complete cycle of sedimentation including sources, transport paths, and sinks.

[13] Rivers and creeks have been dammed and coastlines have been armored.

[14] Ocean Protection Council. 2018 Update. State of California Sea-Level Rise Guidance. California Natural Resources Agency. 84 pp.

[15] Dugan JE, DM Hubbard, DL Revell and S Schroeter. 2008. Ecological effects of coastal armoring on sandy beaches. Marine Ecology 29: 160-170.

[16] Barbour MG, TM De Jong, AF Johnson. 1975. Additions and corrections to a review of North American Pacific coast beach vegetation. *Madroño* 23: 130-134.

[17] Holland RF. 1986. Preliminary descriptions of terrestrial natural communities of California. State of California, Resources Agency: Department of Fish and Game, Natural heritage Division. Sacramento, California. 186 pp.

naturalized sea rocket (*Cakile maritima*). Holland describes beach bur as typically occurring in exposed areas and beach evening primrose occurring in less exposed sites. In the 2010 update to the status of the state's natural communities, CDFW assigned southern foredune habitat the "imperiled" rarity ranking of G2 S2.1[18].

The standard of review for the proposed project at 711 Sand Point Road is the Santa Barbara County Local Coastal Plan (LCP). The County Land Use Plan Policy 1-1 states that all Chapter 3 policies of the Coastal Act have been incorporated in their entirety in the certified County Land Use Plan as guiding policies.

Coastal Act Section 30107.5 defines environmentally sensitive habitat, or ESHA, as:

> *"Any area in which plant or animal life or their habitats are either rare or especially valuable because of their special nature or role in an ecosystem and which could be easily disturbed or degraded by human activities and developments."*

Coastal Act Section 30240 states that:

> *"(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 County Land Use Plan Policy 9-2, in relevant part, states:

> *Because of their State-wide significance, coastal dune habitats shall be preserved and protected from all but resource dependent, scientific, educational, and light recreational uses…*
>
> *Disturbance or destruction of any dune vegetation shall be prohibited, unless no feasible alternative exists, and then only if re-vegetation is made a condition of project approval. Such re-vegetation shall be with native California plants propagated from the disturbed sites or from the same species at adjacent sites.*

Applying the definition of ESHA to a specific habitat invokes a three-part test (1a, 1b, and 2):

1a. Is the habitat rare or does the habitat support rare plants or animals?

[18] California Department of Fish and Wildlife. 2010. California Natural Community List by Hierarchy. September 2010.

The Commission has historically made rarity determinations for habitats and species by utilizing the expert biological guidance from the state and federal resource agencies (CDFW, USFWS) as well as from other expert groups (e.g., CNPS). Habitats and species that are rare include:

- Global or State 1, 2, or 3 ranked habitats (natural communities) or species[19]
- Federal (ESA) or State (CESA) endangered or threatened species
- California Native Plant Society (CNPS) 1B and 2B ranked plants[20]
- California Species of Special Concern and Fully Protected Species
- Candidate endangered or threatened species

1b. Is the habitat, or the plant or animal species in the habitat, especially valuable because of their "special nature" or because they play an "especially valuable" role in a habitat or ecosystem?

A special determination may be made based on an area constituting "especially valuable habitat" when it is of a special nature such as providing a pristine example of a habitat type or representing an unusual species assemblage or ecotone. A special determination may also be made based on an area's special role in the ecosystem (e.g., supporting important ecological linkages, representing the edges of species' ranges that harbor genetic diversity, or tree groves supporting nesting raptors or monarch butterfly colonies).

2. *Lastly, is the habitat, or the rare plant or animal species in the habitat, easily disturbed or degraded?*

Once an area has been determined to support habitat or species that are rare or especially valuable, those resources are considered in terms of their sensitivity to disturbance and degradation from human activities and developments. Habitat fragmentation is an example of how human activity can degrade natural resources, as is removal of major vegetation, grading, alteration of landforms, noise, artificial night lighting, and non-native invasive species.

In past actions, the Commission has recognized dunes as ESHA, including categorically in many LCPs[21]. The Commission has taken a conservative approach to protecting dunes given their extreme rarity (coastal dunes are only found along the thin margin between the ocean and land and many have been destroyed by development) and because where they persist, they tend to be degraded and invaded by non-native invasive species. While native dune vegetation is a key indicator of dune habitat, the Commission has also found that unvegetated areas exhibiting dune substrate and morphology (hummocks, hollows, ridges), dune areas dominated by non-native invasive

[19] http://www.natureserve.org/conservation-tools/conservation-status-assessment
[20] https://www.cnps.org/rare-plants/cnps-rare-plant-ranks
[21] For example, see Eureka Certified LCP (1984), Morro Bay Certified LUP (1982), UCSB LRDP (2010), and Malibu LUP (2002).

species, and small areas of dune habitat among residences, all constitute dune ESHA[22].

Habitat that meets the definition of ESHA is subject to Coastal Act Section 30240, which is also part of the County's certified LCP. Section 30240(a) only allows resource dependent uses to occur within ESHA (such as habitat restoration, nature study and scientific education and research, and low-impact public access and recreation such as hiking trails and primitive and interpretive camping) and requires those resource dependent uses to protect against any significant disruption of ESHA habitat values. Policy 9-2 of the LUP also similarly states that: "Because of their State-wide significance, coastal dune habitats shall be preserved and protected from all but resource dependent, scientific, educational, and light recreational uses…".

In addition to the restriction of uses allowed within ESHA, 30240(b) requires that development in areas adjacent to ESHA be sited and designed to protect ESHA from any impacts that would significantly degrade the ESHA and that would not be compatible with its continuance. One siting and design measure that has typically been employed is the use of buffers between development and ESHA that are of a sufficient size to ensure no adverse impacts to the ESHA itself. In many LCPs certified by the Commission, where specified, ESHA buffers are typically a minimum 100 feet[23]. The Commission has also applied a minimum 100-foot buffer to ESHA in past permit actions, including to protect dune habitats. At times, it has reduced the required dune ESHA buffer to 25 feet where best management practices are employed and dune mitigation is required[24].

The Santa Barbara County LCP requires buffers between development and ESH, although it only specifies an explicit minimum buffer width for certain types of habitat (e.g. stream ESH, wetland). No specific buffer width is included for dune ESH, so the required width must be determined based on site-specific evidence through a permit action.

In the residential area at 711 Sand Point Road, I find that the habitat identified as iceplant mats by Storrer Environmental Inc. LLC, Padre Associates, Inc. and MRS Environmental Inc., is degraded southern foredune habitat characterized by sandy substrate exhibiting dune morphology (hummocks and hollows) dominated by iceplant mats that consist of non-native highway iceplant and sea fig with a significant cover of native beach bur and beach evening primrose. Southern foredune habitat is rare and is easily disturbed and degraded by human activities and development such as non-native species invasion and armoring such as revetments. The degraded southern foredune meets the rarity and disturbance ESHA tests and therefore rises to the level of ESHA. I

[22] For example, see CEMEX Sand Mining (CDO CCC-17-CD-02), Fort Ord Dunes State Park (CDP 3-14-1613), City of Oxnard LCP Amendment 1-05 (Oxnard Shores), and City of Malibu LCP Amendment 1-07 (Malibu Bay Company).
[23] For example, see Eureka Certified LCP (1984), Morro Bay Certified LUP (1982), UCSB LRDP (2010), and Malibu LUP (2002).
[24] For example, see Oceano Pavillion (A-3-SLO-04-061) and County of Los Angeles, Department of Beaches and Harbors (CDP 5-17-0537).

determined the boundary line for the southern foredune ESHA based on the presence of sandy substrate, dune morphology, and native dune species (Figure 10). I recommend that a minimum 25 foot buffer be established between the southern foredune ESHA and development to protect the habitat consistent with the policies of the County's LCP, provided best management practices are put in place and dune mitigation is required.

Figure 1. Figure 3, Soils Map, of the Storrer Environmental Inc. Biological Assessment showing the area identified in yellow closest to the ocean as Beach or sandy substrate and the area just inland of this area as Aquent or fill soils.

Figure 2. Figure 4 of the Storrer Environmental Inc. LLC Biological Resources Assessment showing the 0.024 acre salt grass berm in green near Carpinteria Marsh and the 0.48 iceplant mat area in tan adjacent to the ocean.

Figure 3. Cover photo of the Storrer Environmental Services LLC August 2018 report showing the large light green patches of beach bur among the iceplant mats and the hummock and hollow dune morphology.

Figure 4. Photo 3 of Storrer Report taken July 10, 2018 with a view of the east side of the existing residence looking toward the Pacific Ocean with iceplant mats in foreground and beach bur patch to east of flag and more beach bur patches in the background.

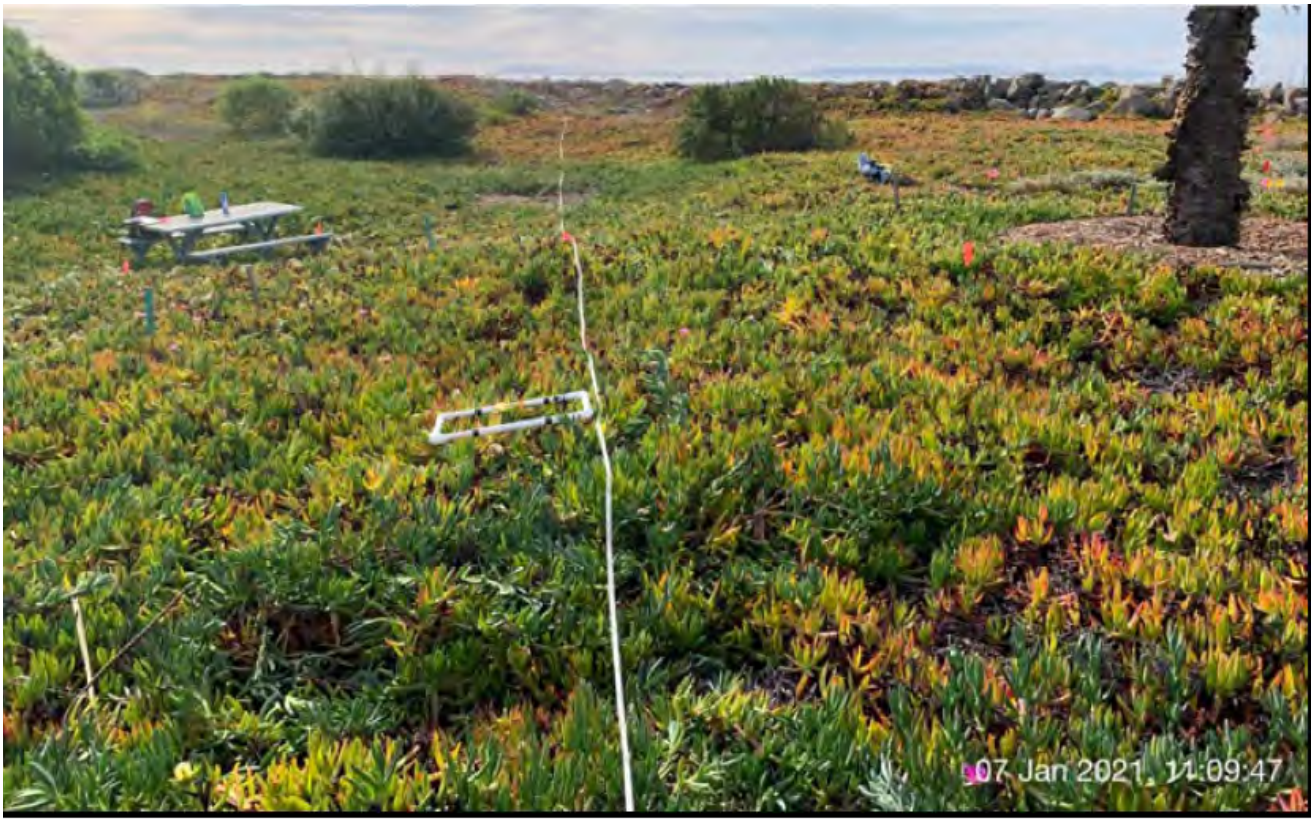


Figure 5. Photograph 8 of the Padre Assessment with a close-up view east of the existing residence looking toward the Pacific Ocean with iceplant mats and no obvious native dune species.

Figure 6. Photo 1 from MRS report “overlooking the iceplant mats/dunes from near the rock revetments on the south side of the property”. Photo 1 was taken from the southeast corner facing northwest. Compare this photo taken on January 12, 2021, with Figure 3, the front cover photo of the Storrer Report taken in August 2018 and Figure 7, taken on June 9, 2020, during my site visit. The beach bur, so obvious in the Storrer Report photo and my site visit photo (Figure 3 and Figure 7, respectively) is virtually absent. The June 9, 2020 site visit was just six months before the MRS photo was taken.

Figure 7. June 9, 2020 site visit photo taken from the revetment with southern foredune habitat between the revetment and the house. The large light green patches are beach bur and the small patches with yellow flowers are beach evening primrose. Sand is visible in the bare areas. The person with the blue ball cap is in front of a coyote bush.

Figure 8. June 9, 2020 site visit photo showing numerous patches of beach evening primrose immediately in back of the house with a patch (light green) of beach bur in the left of the photo near the edge of the property.

Figure 9. June 9, 2020 site visit photo – showing bare sand patches, iceplant mats and beach bur and beach evening primrose patches.

Figure 10. The yellow line is the northeastern boundary delineation on the residential portion of subject property that I have made for the extent of the southern foredune ESHA based on sandy substrate, dune morphology, and presence of native dune plants. The area seaward of the existing residence and the yellow line is the extent of the southern foredune ESHA.