

# EXHIBIT 13

## Public Outreach Summary

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Coastal Hazards and Sea Level Rise  
Local Coastal Program Amendments

County of Ventura  
Planning Commission Hearing  
Case No. PL20-0039  
Exhibit 13 - Public Outreach Summary

## PUBLIC OUTREACH SUMMARY AND RESPONSES TO COMMENTS

This exhibit summarizes the public outreach and comments that were received for the Ventura County Resilient Coastal Adaptation Project Phase II, Local Coastal Program (LCP) amendments for Sea Level Rise and Coastal Hazards (proposed amendments). This summary includes comments provided at community meetings, and written comments submitted during the comment period, which ran from June 5 to July 22, 2024. Planning Division staff (Planning staff) responses are provided, including whether the comments resulted in changes to the proposed amendments. Sections A and B describe the community meetings and Section C summarizes the written comments and includes Planning staff responses to the comments.

### A. Summary of the Public Workshops

During the summer of 2024, Planning staff conducted four community workshops to present the proposed amendments and gather feedback. Three of the four community workshops were held in the unincorporated areas of the South, Central, and North Coast planning subareas of the coastal zone. Each meeting provided a broad overview of the proposed amendments, as well as presented specific information about local conditions. For example, the meeting on the North Coast included information about shoreline protective devices, whereas the meeting on the Central Coast included information about an evacuation route that will be impacted by sea level rise. Two meetings were conducted at local fire stations (see photo below) and the third at an elementary. For those who could not attend the in-person workshops, one workshop was held virtually on Zoom in both English and Spanish. The community workshops occurred during the first two weeks in June 2024, in the evenings, and each lasted approximately 1.5 to 2 hours. All workshops were facilitated by Planning staff.

The public was notified about the community workshops through the following methods:

- *Flyers*: Posted to the project webpage providing notification of the proposed amendment public review period and community workshops.
- *Postcards*: Mailed 260 postcards to South Coast residents, 297 postcards to North Coast residents, and 1,500 notices into the monthly community service district mailers for the Central Coast. The postcards provided notification of the community workshops.
- *Emails to notification list*: This list was based on the Local Coastal Program update notification list and contacts were added through the course of this project. This list of 980 emails was used to provide periodic updates for the Area Plan amendment drafting process and to send advanced notification of the proposed amendment public review period.



- **On-Line Social Media:** Worked with the County Public Information Officer to post advanced notification of the proposed amendment public review period and the community workshops on the County's Instagram and Facebook accounts.

As a result of these notification efforts, there were twenty-nine attendees for the three in-person community meetings and eighteen attendees in the virtual Zoom meeting.

The community meetings included a presentation and was followed by a discussion. The staff presentation outlined the project and provided a summary of proposed amendments. The presentation included maps of sea level rise projections and visual simulations illustrating the current maximum height and projected maximum height of redeveloped structures under proposed policies.

After the presentation, there was an open forum where attendees asked questions or commented on the proposed amendments. Staff responded to questions whenever possible. Comments were noted and are summarized within this report.

**Ventura County Sea Level Rise Community Work Shops**

The Ventura County Planning Division is conducting community outreach to gather input and feedback about draft goals, policies, and programs that will help unincorporated coastal communities become more resilient to sea level rise and coastal hazards.


*All residents and community members are invited to attend the following community outreach events at the following times and locations. Please RSVP to [kylie.speth@ventura.org](mailto:kylie.speth@ventura.org)*

<p>South Coast: June 6, 2024 6:00 to 7:00 P.M. Fire Station 56 Location: 11855 Pacific Coast Highway, Malibu, CA 90265</p>	<p>County Wide Zoom* Available in English/Spanish June 10, 2024 5:30 to 7:00 P.M. Zoom: <a href="https://ventura-org-rma.zoom.us/j/82446035770">https://ventura-org-rma.zoom.us/j/82446035770</a> Passcode: 735584 <small>*Encuentro virtual está disponible en español</small></p>	<p>Hollywood Beach &amp; Silver Strand June 11, 2024 6:30 to 7:30 P.M. Hollywood Beach Elementary School Cafeteria Location: 4000 Sunset Ln, Oxnard, CA 93035</p>	<p>North Coast: June 12, 2024, 6:00 to 7:00 P.M. Fire Station 25 Location: 5674 W. Pacific Coast Highway, Ventura, CA 93001</p>
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Draft Amendments available here on June 5th: [vcрма.org/en/vc-resilient-coastal-adaptation-project](http://vcрма.org/en/vc-resilient-coastal-adaptation-project), or view by scanning the QR code.

Persons who require accommodation for any disability per the American Disabilities Act (ADA) may obtain assistance by requesting such accommodation by calling (805) 654-2685 or emailing [kylie.speth@ventura.org](mailto:kylie.speth@ventura.org). Any such request for accommodation should be made at least 48 hours prior to the scheduled meeting for which assistance is requested.

For more information, please contact: Kylie Speth, County of Ventura Planning Division at (805)654-2685 or via e-mail at [kylie.speth@ventura.org](mailto:kylie.speth@ventura.org)



[vcрма.org/en/vc-resilient-coastal-adaptation-project](http://vcрма.org/en/vc-resilient-coastal-adaptation-project)



*Save the Date! You're invited to a Community Meeting!*

*Draft Sea Level Rise and Coastal Hazards Local Coastal Program Updates*

The Ventura County Planning Division is conducting community outreach to gather input and feedback about draft goals, policies, and programs that will help Silver Strand and Hollywood Beach communities become more resilient to sea level rise and coastal hazards. Community input and feedback is helpful to ensure the proposed amendments meet the local community needs.

All residents and community members are invited to attend this community outreach event at the following time and location:

- When:** June 11, 2024, between 6:30 and 7:30 PM
- Where:** Hollywood Beach Elementary School Cafeteria at 4000 Sunset Ln, Oxnard, CA 93035

Thank you for taking the time to attend this important meeting. Please see reverse side for more information.

[vcрма.org/en/vc-resilient-coastal-adaptation-project](http://vcрма.org/en/vc-resilient-coastal-adaptation-project)

## B. Summary of Public Meeting Comments

The following section summarizes the comments expressed during the open forum or discussed directly with staff during the community meetings.

**Development comments:** Attendees commented on development and standards for future development:

1. Determine whether houses can be rebuilt once they are gone.
2. Identify issues with using caissons for accessory structures.
3. Evaluate whether the proposed Amendment addresses the issues with storm drains and flooding that both Hollywood Beach and Silver Strand are currently experiencing.
4. Explain why the halting of any new development is not being considered.

5. Consider if new structures in the Coastal Hazard Areas will be required to record a document holding the County harmless of damage that may occur to new development.

Comments regarding Elevating Structures: Attendees commented on elevating structures as it relates to development impacts, and visual resources:

1. Determine whether the proposed building heights will consider the elevation contour lines, which might result in a neighborhood with houses at different heights.
2. Note that the requirement with FEMA is changing, requiring that the bottom floor living be raised depending on the elevation of the parcel, while the height of the building is not changing.
3. Confirm that the reduced vertical development is not a property takings.
4. Clarify the buildable height. Page 25 of the Coastal Zoning Ordinance states that the bottom horizontal beam must be positioned one foot above the height that has a 1% chance of flooding annually. According to page 13, the Ordinance allows for a total of 28 feet above that level for the entire building. If the owner chooses to raise the bottom horizontal beam by 10 feet to safeguard against water, this leaves only 18 feet available for the house.
5. Consider options for those who want to build higher than what is currently projected.
6. Address visual impacts from Highway 101 to the communities in the North from increased building heights.
7. Consider the impact of increased building heights on coastal views.
8. Determine whether existing residential properties in areas that require adaptation mechanisms, such as raising structures on stilts, will be required to be retrofitted at some point.

Coastal Armoring: Attendees expressed interest regarding coastal armoring impacts and limitations from policy implementation:

1. Consider engineering devices that could mimic natural functions to widen the beach in areas with homes (e.g., vertical cobble groins), which could be effective for the North Coast.
2. Explore using sediment to supplement beaches on the North Coast.
3. Concern that this Amendment does not allow for an increase in revetments; it only permits houses to be raised on stilts.
4. Consider requiring shoreline protective structures be designed to attenuate waves rather than reflect them.
5. Explain why policy limits increasing the height of existing seawalls.
6. Evaluate whether there are best available technologies that specifically favor revetments over seawalls. The proposed amendments do not use BACT (best available current technology) as a standard against which resilience structures are judged.
7. Consider the possibility of providing incentives for homeowners to install a rock revetment instead of a seawall, combined with elevating homes.
8. Explain why the proposed Amendments restricts the height of existing



revetments/seawalls, given the potential risk to existing structures.

Insurance Considerations: Attendees expressed interest in insurance considerations:

1. Clarify if there has been any conversation with insurance industry representatives regarding these policies. Confirm if the industry has reviewed the proposed Amendments and provided comments.
2. Recognize that the insurance industry is a major driver in the state.

Community Resilience to Hazards and Emergency: Attendees commented on the emergency response to hazard events and overall community resilience:

1. Address whether the process includes evacuation routes for the Silver Strand Community, similar to crowd control after firework shows in the neighborhood.
2. Consider if the County will send someone to inspect individual properties.
3. Determine if properties in threatened coastal areas would be required to join a protection district to fund improvements that will help mitigate rising sea levels. These might be pumping stations, levees, raised roadbeds, etc.

Sea Level Rise Models and Projections: Attendees commented on the sea level rise model and best available science.

1. Assess the accuracy of the CoSMoS FEMA and models.
2. Consider whether these models examine the combination of sea level rise and storm flooding.
3. Identify which model we utilize to project sea level rise.
4. Consider the likelihood that sea level rise or flooding will exceed 5 feet compared to the FEMA maps.

C. Summary of Submitted Comments

This section summarizes the written comments submitted by residents, non-profits, and government agencies in response to the June 5, 2024 version of the Draft Local Coastal Program Coastal Area Plan (Sea Level Rise and Coastal Hazard Amendment) and the Coastal Zoning Ordinance (CAP and CZO, respectively). The public comment period ended on July 20<sup>th</sup>, 2024, and twenty-six comment letters were submitted. There were three comments in opposition or requesting significant changes, and twenty-three comment letters requesting minor changes and/or generally in support of the proposed amendments. The themes from these written comments received during the public comment period were grouped together and are summarized below. Comments that resulted in changes to the proposed amendments are discussed under the heading of each section.

Lengthy comments were summarized, and a few comments were not included because they were about other topics not related to the proposed amendments. Comments regarding Grammatical suggestions, typos, and formatting changes are appreciated and were included as editing in the updated version of the proposed amendments.

The input submitted showed differing perspectives on how to plan for coastal hazards and sea level rise, although most were generally supportive of the proposed amendments. Commentor names are listed and numbered at the end of this exhibit and these numbers are referenced in the summaries of the comments. Comments were grouped by theme and were organized by subject as follows:

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## Elevating Structures

There were changes made to proposed Coastal Area Plan (CAP) Policies 1.29 and 1.32. Proposed CAP as a result of the public comments about elevating structures, as summarized below. Policy 1.29 was amended to allow sandy beach development to use caissons and proposed CAP Policy 1.32 was amended to clarify temporary development in the event of an emergency (21).

**Comment:** Florida publishes the height of elevation required for each part of the coast, rather than asking each applicant to reinvent the wheel. We encourage the county to get funding for such a study, to avoid the duplication and cost of individual Coastal Hazards Reports. In the meantime, publishing on an online map at the elevations determined as they are approved would show property owners what to expect when they think about renovating and elevating (10). The reduced vertical development may even be considered a taking (1).

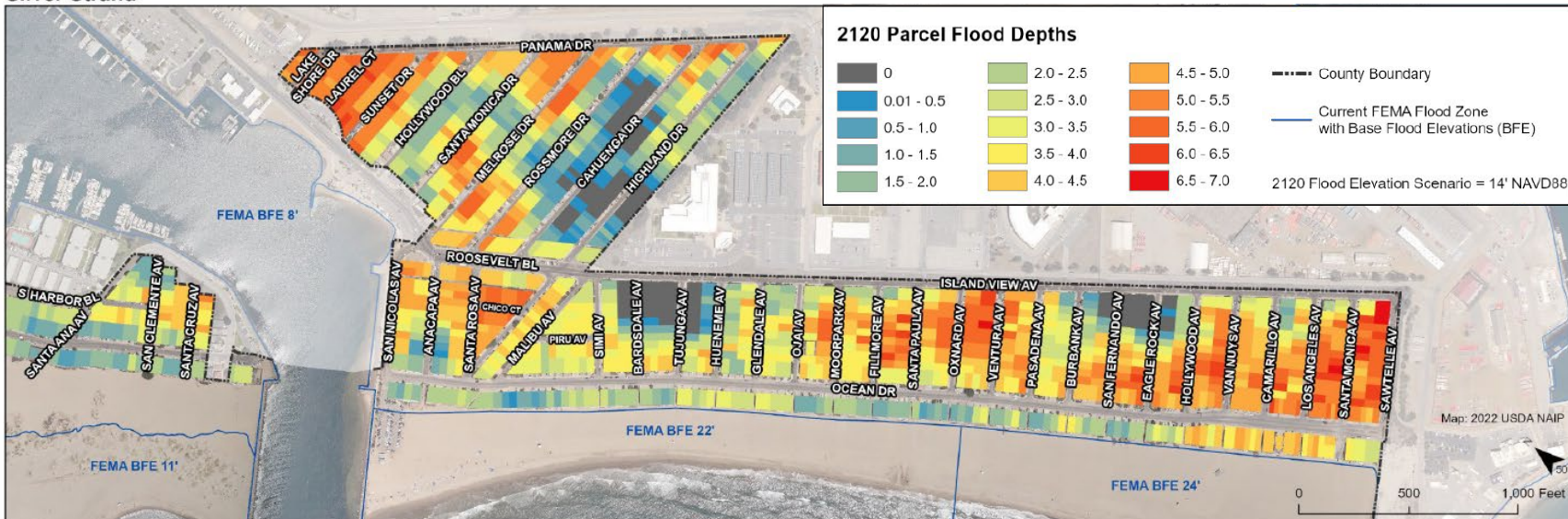
*Response: While the elevation of new development and substantial redevelopment to accommodate potential hazards would be reviewed on a case-by-case basis, the estimated flood depths and elevations for Hollywood Beach and Silver Strand, are shown in map below and were evaluated in Exhibit 18 (Hollywood Beach and Silver Strand Flood Depth Analysis). Proposed CAP program 1.5 allows the Planning Director to accept a neighborhood scale coastal hazards analysis report. Proposed Program 4.7(a)(ii) directs the County to apply for grants to conduct neighborhood scale still water design elevation planning. Proposed Policies 1.35 and 1.36 allow deviation from the LCP policies and development standards in order to avoid an unconstitutional taking of private property without just compensation.*

# FUTURE FLOOD DEPTHS BY PARCEL FOR HOLLYWOOD AND SILVER STRAND VENTURA COUNTY, CA

## Hollywood



## Silver Strand



**Comment:** With the proposed elevation of certain homes within the region, it is critical that the existing height restrictions be maintained. The majority of homes in Silver Strand are large relative to the property size. There is generally very little space between homes already, so maintaining a strict cap on the height of new construction is critical (20). Rather than establishing building codes that only increase the size and scale of potential new homes, the county should consider reasonably limiting the size and scale of homes (24). I think it is important to minimize the impact of the height of buildings rather than increase them even though this would be a result of sea level rise (6).

*Response: As shown in the map analysis above, as structures are redeveloped, proposed amendments would not require some structures to be elevated, some would be required to elevate with a couple of feet on fill, and others may require piles. The most elevation is 7 feet as shown in the map above but Exhibit 18 describes this elevation would only be needed for six parcels, and 87 percent of parcels would require five feet or less elevation. The elevations would not stand out or be pertinently obvious because it would occur in limited low-lying areas in the local Silver Strand topography. The elevation is intended for redevelopment to accommodate sea level rise and coastal hazards for the expected life of the structure. The height standards of the habitable floors are not proposed to be amended, and proposed Policy 1.7 limits elevation to ensure consistency with visual resource protection policies.*

*The majority of structures in Silver Strand are zoned Residential Beach Harbor. Per the proposed CZO Section 8175-3.13.2, building height in the Residential Beach Harbor is calculated from 18 inches above the highest point of the street centerline or the minimum elevation of the first floor established by the Coastal Hazards Analysis Report to the finished roof. This finished roof is the maximum height that a building is allowed; in the Residential Beach Harbor, the maximum height is 28 feet, for a flat roof. Depending on if a property is elevated, the caisson elevation may be included in the calculation, impacting how much livable space a property can have. If a property needs to be elevated higher to account for sea level rise and coastal hazards, the development is still restricted to the height maximum in CZO Section 8175-2.*

**Comment:** The Local Coastal Program does not allow for revetments but requires houses to be raised on stilts (3).

*Response: The proposed amendments would not require existing houses to be raised on stilts. Proposed CAP Policy 1.2 would require new development and substantial development to be designed to minimize risks to life and property in areas subject to coastal hazards, ensure the stability of the development without the development of shoreline protective devices, and to avoid the geologic instability, erosion and the destruction of the site or surrounding area. In accordance with the proposed amendments, when substantial redevelopment occurs, it may need to be designed to be elevated on compacted fill, on stilts/piles, or other designed methods for resilience to floods. As described further in the Shoreline Protective Devices Section below, proposed CAP Policies 1.12 and 1.17 allow revetements to protect existing structures in a manner that is consistent with the Coastal Act.*

**Comment:** Draft CAP Policy 1.29 is not practical because sand beach development must be on caissons and we oppose proposed CAP Policy 1.32 as there are some emergency permits that will require caisson supported vertical seawalls (21).

*Response: In response to these comments regarding proposed policies for designing caissons development to be removable, the proposed CAP Policies 1.29 and 1.32 were amended. Draft CAP Policy 1.29 was amended to allow caisson development on sandy beaches for principal structures and internal accessory dwellings with the caissons designed for future relocation or structure removal. If complete removal of the caissons is not feasible, they may be truncated at a depth so they would not protrude from the beach. Draft CAP Policy 1.32 was amended to provide guidance for use of temporary development such as “tarps, sandbags, and other similar structures” in the event of an emergency.*

**Comment:** The CZO definition for height should be amended to base height on the lowest horizontal structural member. This would help to incorporate sea level rise planning in CZO Section 8174-6.3.5 disaster replacement of structures that allows for a 10% height increase. The building height regulations in the Residential Beach and Residential Beach Harbor should also be measured from the lowest horizontal structural member instead of “the minimum elevation of the first floor as established by the Public Works Agency based on a Coastal Hazards Analysis Report (see Appendix H1) (10).”

*Response: The current definition of height in the CZO is “The vertical distance from the adjacent grade or other datum point to the highest point of that which is being measured.” If the definition of height were revised to be based on the lowest horizontal structural member, it would apply to nearly all types of structures and all zoning districts of the coastal zone. An amendment of that scale has not been evaluated because that is beyond the scope of the VC Resiliency project. The proposed amendments under Goal 1 focus on development in existing shoreline communities of the RB and RBH Zones, which are proposed to be located in the Coastal Hazard Screening Areas. The amendments are not intended to apply to other areas that do not have a sea level rise and/or FEMA measurement to guide the design of development horizontal structural member.*

*CZO Section 8174-6.3.5 provides guidance for a structure demolished by a disaster to be replaced. This section references the Coastal Act Section 30610, which outlines development authorized without permits. In both regulations, the replacement structure is not to exceed the destroyed structure by more than 10%, including bulk and height. This would exempt the replacement structure from a Coastal Development Permit. If the replacement structure would exceed the ten percent height increase it would require a Coastal Development Permit. Since this 10% metric is in the Coastal Act, the County’s LCP cannot deviate without creating an inconsistency that would not be certified by the California Coastal Commission.*

## **Public Facilities**

There were changes made to the proposed LCP amendments in response to comments regarding public facilities. The proposed CAP Policy 1.24 was revised to allow drainage devices on bluffs (21). The proposed CAP Policy 1.45 was revised to include some types of health care facilities (19). Draft Table 1 in CAP Policy 1.4 was revised to include “public visitor facilities” in the proposed use section for “public restrooms and ancillary structures” (28).

**Comment:** There should be an exception to the proposed CAP Policy 1.24 which limits development on bluffs, to allow drainage devices (21).

*Response: During an October 2024 site visit to South Coast to study this comment, staff observed*



*existing drainage systems in bluff faces. In response to this comment, the proposed CAP Policy 1.24 was amended to include “drainage systems” instead of “public works facilities” to provide more specificity on the allowed structures on bluff faces. Proposed Policy 1.24 also includes “New drainage systems shall be designed to be the minimum extent necessary as described in the Coastal Hazards Report and in consultation with the Public Works Agency.”*

**Comment:** There should be an economic consideration in Public Works initiated projects, where a lower resiliency threshold may be considered if it is cost prohibitive. An example is if a Public Works project is financially possible at 35 years with a 35 year design life but cost prohibitive at 75 years, the 35 year design requirements can be used instead of the 75 year design requirements. There is a plan to upgrade the Faria restroom, concession and shower into a combined building (28).

*Response: In response to this comment, the proposed use category for public restrooms and ancillary structures in Table 1 was clarified to include “visitor facilities and concession stands.” In the row for “public restrooms and ancillary structures” because the structure described by the commenter would typically be developed at the same scale and intensity, an expected life of 20 years was applied using the “intermediate” sea level rise scenario.*

*Proposed CAP Policies 1.41 and 1.42 provide an avenue for large scale “public works initiated projects” to be approved where full adherence to development standards would render the project infeasible. Proposed CAP Policy 1.42 lists the permit findings needed to approve the development, which includes phased adaption strategies that would ensure resilience against sea level rise combined with a 100-year storm event.*

**Comment:** In the Mussel Shoals community, we do not have restrooms facilities for beach goers, kayakers, surfers or the many fishermen who visit our community. How can we initiate getting one or two restrooms to help keep our oceans, beaches, and property clean (16)?

*Response: At this time, there is not a plan for the County to install a public restroom at Mussel Shoals. In the future, there may be an opportunity for public facilities, such as restrooms, with the Rincon Pier Decommissioning Project. The Rincon Pier Decommissioning Project includes the Rincon Island, the causeway connecting the mainland to the island, a State Coastal Conservancy owned parcel, and the onshore property. The State Lands Commission is currently decommissioning Rincon Island facilities and removing and remediating the soil and groundwater on the onshore property. Currently, the State is still determining the future uses of these parcels.*

**Comment:** Caltrans recognizes the potential for adverse impacts on coastal resources from shoreline protective devices as discussed in the proposed CZO Section 8175-5.12.1(a). Coastal Act Section 30235 lists certain development that may be allowed “when designed to eliminate or mitigate adverse impacts on local shoreline sand supply.” Shoreline protective devices may be lawfully allowed and represent a reasonable short-to mid-term sea level rise adaptation strategy. This is especially true where critical infrastructure exists (25).

*Response: The proposed CAP Program 4.11 directs the County should coordinate with Caltrans for sea level rise adaptation planning. Adaptation analysis required for new development in a coastal hazards screening would require an alternative analysis of non-structural solutions before a new shoreline protective device could be allowed. The proposed CZO Section 8175-5.12.1*

*outlines the standards for the maintenance of shoreline protective devices and the Coastal Hazard Report requirements in Appendix H1 would require an evaluation of the impacts to local shoreline sand supply.*

**Comment:** The references to the hospitals and health care facilities should not be struck out in proposed CAP Policy 1.45 as they are essential public facilities that should be included in policy for sited emergency facilities outside of risk areas whenever possible (19).

*Response: The list provides examples of types of facilities that should not be sited in the Coastal Hazard Screening Areas and is not exhaustive. The reference to health care facilities was added back in because clinics are allowed on "Coastal Commercial" zoned properties.*

### **Aesthetic Impacts**

There were no changes made to the proposed LCP amendments in response to comments summarized in this section.

**Comment:** California's greatest attribute is the ocean and being able to visit or view the coast. I think it's important to minimize the impact of the height of buildings rather than increase them even though this would be a result of sea level rise (2 & 6). I recognize you did some viewshed analysis but it was limited and even that showed some negative impact. With this in mind, I do not believe an increase in height should be permitted (4). Will you address the visual impacts from Highway 101 in the North Coast (30)?

*Response: Many parcels in the Coastal Zone are small, with minimum lot size as small as 1,750 square feet in the RBH zone. With such small parcels size, elevation will be the principal adaptation strategy since State guidance discourages shoreline protective devices. And even with shoreline protective devices, flooding behind the devices may still occur as they are not designed to function as levees. The proposed amendments to phase in higher elevation of new development and substantial redevelopment is the most viable solution to begin planning for sea level rise on small lots.*

*Additional visual analysis was conducted as shown in Exhibit 17 and it demonstrates that FEMA generally already would require most of the elevation for new development on the North and South Coast. Also, the visual impacts would not be significant from public viewpoints such as Highway 101. The existing communities along the North Coast that will be elevated in accordance with FEMA requirements that are effective today, and would be elevated in accordance with the proposed sea level rise amendments which compromise approximately 2.6 miles of the approximately 11.55-mile North Coast shoreline and so at least 77.5% of the viewshed from the highway would not be impacted.*

**Comment:** Health and safety are the main justifications for zoning rules. Views are not a reason to limit safety. Views from the 101 will be barely affected, since much of the '101' along the ocean has no homes in the way. At Mussel Shoals the view from the 101 is a concrete wall. The concern about viewsheds prevents owners from building higher and results in planning for a short period knowing that the building will need more elevation later or plan for a longer period. It is cheaper and less dangerous for owners to elevate more in the first place, rather than elevate now and then again in future decades (10 & 30).

*Response: Please see the above response to the previous comment. Generally, there will be some additional elevation and non-significant visual impacts from public viewpoints as a result of the FEMA requirements effective for the North and South Coasts today, and as redevelopment occurs. The proposed amendments for sea level rise would fill in the gaps in the FEMA zones on the North and South Coast so that elevation will be consistent through the community and require elevation of the Central Coast communities of Silver Strand and Hollywood Beach. The Coastal Act, Section, 30251 states, "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." Please see Exhibit 17 for further analysis the visual resources.*

## **Emergency Response**

There was a change made to the proposed LCP amendments in response to the public comments summarized in this section. Proposed CAP Program 4.13 was added to encourage the County to seek funding to address the drainage system issues in Hollywood Beach and Silver Strand (2, 12, 20).

**Comment:** There is a need for collaboration and maintenance of critical public roadways for emergency evacuation of base personnel and neighboring communities (2 & 27). Evacuation from Silver Strand requires collaboration between the Cities, County of Ventura, the United States Ventura Navy Base, and the Community Emergency Response Team (14). The City of Oxnard would like to collaborate with the County for the Hollywood Beach and Silver Strand Beach areas through neighborhood-scale planning to increase community resilience (22).

*Response: Proposed CAP Program 4.12 encourages interagency cooperation to seek funding and improve the roadway, waterfront and stormwater drainage of the southern terminus of South Victoria Avenue at Hobie Beach. These improvements would increase community resilience, particularly if an evacuation is needed. A neighborhood-scale planning program, where there can be a more focused approach to addressing the localized neighborhood issues and concerns. Planning staff and other County agencies will continue to coordinate with the adjacent jurisdictions for regional sea level rise and coastal hazards planning.*

**Comment:** The Planning staff presentation at Hollywood Beach meeting noted that there has been historic flooding and that these areas do not have storm pumps to assist in the flooding. The stormwater pumps at Silver Strand are inadequate and flooding is projected to worsen. The French drainage system in Hollywood Beach and Silver Strand have outlived their useful lives. Specific mitigation measures should be developed to address the flooding (2, 12). I understand that there will be planning for a solution by 2030 but I believe that the urgency is greater based off this winter [2023-2024] flooding (20).

*Response: In response to these comments, the proposed CAP Program 4.13 was added. This new program reads, "The County should study how to improve the roadway, waterfront, and stormwater drainage in Hollywood Beach and Silver Strand to increase resilience from sea level rise and coastal flooding when funding is available."*

*The proposed CAP Program 4.12 identifies the southern terminus of South Victoria Avenue at Hobie Beach as needing improvements and is focused on coordination between multiple jurisdictions. The proposed CAP Program 4.7 supports neighborhood scale planning for coastal hazards and sea level rise.*

**Comment:** Ensure that emergency planning includes four elements. Firstly, [1] inform residents of the flood threat to South Victoria Avenue at Hobie Beach and alternative evacuation routes. Secondly, [2] ensure that residents are aware of how to report emergency and or flood situations within the neighborhoods. Thirdly, [3] inform residents of the flood zones within the neighborhood with a color-coded map that shows the regions with the greatest risk of flooding. Fourthly, [4] inform residents prior to large construction projects and bi-annual dredging, such as the [5] North Jetty construction project that occurred previously (20).

*Response: The response to this four-part comment was separated into five different categories.*

1. *There are ten tsunami evacuation route signs in the Silver Strand community that residents can use for evacuation. Per the proposed CAP Program 4.12 there will be interagency cooperation to seek funding and improve the roadway, waterfront and stormwater drainage of the southern terminus of South Victoria Avenue at Hobie Beach. These improvements would aim to increase the community resilience. There is a plan to evacuate through the naval base, but that entrance is close to the Hobie Beach area which is among the most vulnerable low-lying areas of the community. A community member provided a flyer (see first two images below) that informs residents about evacuation routes. The flyer shows an option to evacuate through the Naval Base Port of Hueneme, and implies that the Navy has plans to open its gates during such an emergency. More recently, the Sheriff released an All Hazards Evacuation Plan in September 2024 that includes similar, but less detailed tsunami evacuation routes (see the third image) <sup>1</sup>.*

<sup>1</sup> [https://s29710.pcdn.co/wp-content/uploads/2024/09/Evac-Plan\\_OES-FINAL\\_240930.pdf](https://s29710.pcdn.co/wp-content/uploads/2024/09/Evac-Plan_OES-FINAL_240930.pdf)

### How to Use This Map:

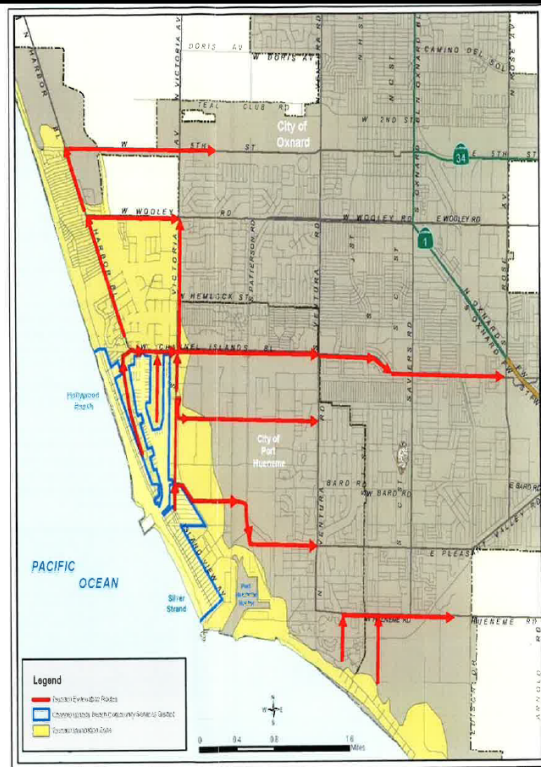
Locate where you live, work, and play. If you are in the yellow Tsunami Hazard Zone, evacuate immediately after feeling a strong earthquake. Use this map to plan a safe evacuation route. Practice evacuating so that you and your family know what to do during a real tsunami.

Tsunami Zone signs may be placed within the tsunami zone as a reminder that you should evacuate if you are in this area when an earthquake occurs. Entering and leaving tsunami signs are placed on roads near where you cross into and out of the tsunami hazard zone. Take note of where these signs are located. If a large earthquake occurs, go past this point inland to be in a safe area.

Visit <http://gis.ventura.org/CountyView/> for additional map related information about this and other hazards that might affect Ventura County.

**Outside the map area?** Use signs to guide you to safe areas. If there are no signs, go to an area 100 feet above sea level or two miles inland. If you cannot get this far, go as high as possible. Every foot inland or upwards can make a difference.

*Evacuation maps are for emergency planning and response and are not intended for any other purposes. This map is to help you protect yourself from the worst-case tsunami event for our area. It is based upon the most current data available and is subject to change. It does not include any information about the probability of a tsunami hitting our area and does not reflect how an actual tsunami may impact the region.*



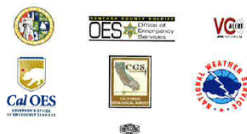
### What You Can Do Before the Next Tsunami:

#### Be Prepared

- Keep a "grab and go" kit by the door
- Discuss emergency plans with family, coworkers and neighbors
- Have a NOAA Weather Radio at home and at work
- Consider how to evacuate pets — such as dogs on leashes and cats in crates
- Arrange assistance from family and neighbors if you need help evacuating

#### Questions or want more information?

Ready Ventura County: [www.ReadyVenturaCounty.org](http://www.ReadyVenturaCounty.org)  
 County of Ventura Emergency Information: [www.vcemergency.com](http://www.vcemergency.com)  
 Ventura County Fire Department: [www.vcfd.org](http://www.vcfd.org)  
 California Department of Conservation: [www.cdcr.ca.gov/csl/geologic\\_hazards/Tsunami](http://www.cdcr.ca.gov/csl/geologic_hazards/Tsunami)  
 Cal OES My Hazards: [www.myhazards.caloes.ca.gov](http://www.myhazards.caloes.ca.gov)  
 California Geological Survey: <http://www.tsunamizone.org/california>  
 Great California ShakeOut: <http://www.shakeout.org/california>  
 National Tsunami Warning Center: [www.tsunami.gov/](http://www.tsunami.gov/)  
 Earthquake Country Alliance: [www.earthquakecountry.org/](http://www.earthquakecountry.org/)  
 The Tsunami Zone: [www.tsunamizone.org/california/](http://www.tsunamizone.org/california/)



### Tsunami Preparedness

for the Oxnard/Hueneme Area  
Ventura County, California

A tsunami is a series of water surges usually caused by an earthquake beneath the sea floor.

#### Tsunamis can trick you!

- The first surge is not the largest.
- It is not unusual for tsunami surges to last at least 12 hours and in some cases longer.
- Just when you think it is all over, another very large surge may come.

#### What areas are at risk?

Beaches, harbors, ports, and river mouth areas are at greatest risk. If you are in the YELLOW areas on the map (inside), you should leave after feeling a strong earthquake that lasts a long time. Move to higher ground or inland.

#### How do I know if an earthquake is big enough to cause a tsunami?

If you are on the beach and feel an earthquake, no matter how small, **move inland or to high ground immediately.**

In other low-lying areas, COUNT how long the earthquake lasts. If you count 20 seconds or more of intense ground shaking and are located in a tsunami hazard zone, **evacuate** as soon as it is safe to do so.



Channel Islands Marina



Hueneme Beach Park / Pier

### Two Ways to Know if a Tsunami is Coming:

#### Natural Warnings

Ground shaking, a loud ocean roar, or the water receding unusually far, exposing the sea floor, are all nature's warnings that a tsunami may be coming. If you observe any of these warning signs, **immediately get to higher ground or inland.** A tsunami may arrive within minutes and damaging surges are likely to occur for at least 12 hours and possibly longer. Stay away from coastal areas until officials permit you to return.

#### Official Warnings

You may be notified that a Tsunami Warning has been issued via VC Alert, TV, radio stations, telephone, door-to-door contact by emergency responders, NOAA weather radios, or other means of notification. Move away from the beach and seek more information without using a phone. Tune into local radio or television stations for more information. Follow the directions of emergency personnel who may ask you to evacuate low-lying coastal areas.



Figure E-5. Tsunami Evacuation Route Map\_Oxnard



2. Community members can sign up for emergency alerts through the Sheriff's Ready Ventura County webpage to be notified when there is a flooding threat. This system connects to the Ventura County Public Works Agency (Public Works) flood warning system. When flooding occurs, contact the Public Works Road Dispatch at (805) 672-2131.
3. Federal Emergency Management Agency has an online flood hazard map called the National Flood Hazard Layer Viewer that shows flood zones. The Ventura County Public Works Agency also has flood hazard maps available online. A map for the neighborhood may be considered during the neighborhood-scale program, where there can be a more focused approach to addressing the localized neighborhood issues and concerns.
4. As a part of the County's discretionary permit process, public hearing notifications are sent to residents prior to the hearing. The notice of the public hearing will be mailed ten days prior to the hearing to property owners within 300 feet of the property or, if there are more than 1,000 property owners, a newspaper advertisement is required to be published. In some cases, for projects along the shoreline and federally led Army Corps projects, the County is not the lead agency or the responsible agency and would not lead the public notification process.
5. The lead agency for the Channel Islands Harbor Breakwater and Jetty Repair Project was United Army Corps of Engineers (Army Corps), Los Angeles District. The Army Corps



*completed the permitting process with the Coastal Commission. The project resulted in a "Negative Declaration" and includes the restoration of up to 13.5 acres of sand dunes within 10 miles of the project. Please contact the Army Corps or harbor Department for updates about this project.*

### **Definitions for "Existing" and "Substantial Redevelopment"**

There was a change made to the proposed LCP amendments in response to the comments described in this section. The proposed CAP Policy 1.19 regarding maintenance of shoreline protective devices was amended to "protect coastal dependent uses, existing structures, public roads, or public beaches (25)."

**Comment:** The County's proposed definition of existing structures would expand shoreline armoring beyond the intent of the Coastal Act and is therefore unlawful. When the Coastal Act Section 30235 references "existing structures" the Coastal Act authors made the distinction that non-existing buildings should not be permitted to have shoreline protective devices. We suggest that the County's definition reference Coastal Act and the effective date of the Coastal Act January 1, 1977 and remove reference to the "legally permitted principal structures" to avoid ambiguity (18).

*Response: The proposed amendments pertaining to shoreline protective device are consistent with Section 30235 of the Coastal Act. In particular, proposed CAP Policy 1.12 references Coastal Act Sections 30235 as the guiding authority for determining when shoreline protective devices can be permitted under the County's LCP. See Response to comment on page 33 below for additional explanation regarding this issue.*

**Comment:** We oppose the definition of substantial redevelopment in the proposed CAP Policy 1.9. The County's definition of substantial redevelopment should remove the date of the proposed Amendment and replace it with January 1, 1977 (18).

*Response: Traditionally ordinances apply the adoption date when phasing in new standards. This is to ensure that the regulations are not unfairly changed on permittees or property owners that have legally authorized permits for the use.*

*The City of Santa Barbara successfully received certification for their LCP amendment for coastal hazards and sea level rise in 2019 with a reference to substantial redevelopment as following the certification date of the Coastal Land Use Program for areas within potential shoreline hazard screening areas. This Local Coastal Program did not use the January 1, 1977 date of the Coastal Act was approved by the Coastal Commission but instead stated that one definition of substantial redevelopment is "A substantial redevelopment occurs ... takes place following the date of certification of the Coastal LUP.."*

**Comment:** The proposed CAP Policy 1.12 discusses what shoreline protective devices shall be permitted based on an undefined reference to existing structures. Existing must be defined as what exists as of the time of permit filing and added to this section (26).

*Response: The proposed CAP Policy 1.12 includes the language of the Coastal Act Section 30235. Coastal Act Section 30235 does not define existing structures but states that shoreline*

*protective devices “shall be permitted when required to serve coastal-dependent uses or to protect existing structures or public beaches in danger from erosion, and when designed to eliminate or mitigate adverse impacts on local shoreline sand supply.”*

**Comment:** The proposed CZO Section 8175-5.12.1(a) defines “existing structure.” Caltrans has received permits from the County and Coastal Commission for shoreline protective devices projects along the Pacific Coast Highway where the roadway itself was considered a “pre-Coastal Act existing structure.” Given this, Caltrans recommends that the proposed definition reflect the Coastal Act Sections 30235 and 30253 as it related to existing structures (25).

*Response: The proposed CZO Section 8175-5.12.1(a) references Coastal Act Section 30235 and describes a legally permitted principal structure, including but not limited to a main dwelling and any internal accessory dwelling, that qualifies as “existing” within the meaning of Section 30235 and that has not subsequently undergone substantial redevelopment.*

*In response to this comment, proposed CAP Policy 1.19 was revised to authorize repair and maintenance of existing shoreline protective devices for projects that “protect coastal dependent uses, existing structures, public roads, or public beaches in danger of erosion...”*

**Comment:** If the County proceeds with the neighborhood scale sea level rise adaptation strategies, we strongly suggest a definition of “existing community” that includes pre-Coastal Act (1977) development only (18).

*Response: “Existing community” is a term historically used in the CAP and County’s General Plan to define the unincorporated urban enclaves in Ventura County that have not been annexed into a city. The CAP describes and lists existing communities as distinct neighborhoods with residential, commercial, and industrial uses. The eight coastal existing communities in the North Coast Subarea, two industrial and six residential, were designated by the County in 1978 to recognize the existing urban development and allow those specific areas to infill according to their zoning designation. The Solromar existing community is the only community in the South Coast Subarea and it covers about 2,800 linear feet of non-continuous shoreline frontage. The Hollywood Beach and Silver Strand existing communities are in the Central Coast Subarea and are mainly residential developments with limited commercially zoned parcels. Since these communities are relatively distinct in the geographic landscape, they are suitable units for future efforts to develop neighborhood scale sea level rise adaptation plans that could include more detailed analyses and strategies for natural resources, infrastructure, and development.*

## **Miscellaneous Comments**

There was one change made to the proposed LCP amendments in response to public comments in this section. Draft Policy 2.18 was amended to encourage community programs such as “artificial reefs, seafloor kelp/eelgrass restoration, and resting/nesting areas for marine mammals (11, 21, 23, 26).”

**Comment:** The federal government is encouraging innovation. When I searched through the proposed amendment, I was unable to find “innovation” anywhere. The amendment should consider innovation solutions and expand the appendix section to include sea level adaption projects that have already been completed. Another example is to inform people of the benefits

of creating an EcoDistrict (11).

*Response: While the word "Innovation" is not specifically included in the proposed LCP amendments, the proposed amendments allow for applicants for development and the County to seek funding for innovative adaptation strategies. For example, the proposed CAP Program 4.7(a)(i) suggests that the County could consider developing a beach management plan for Hollywood Beach and Silver Strand. This plan could balance coastal access, recreational uses, and the health and protection of sensitive coastal resources. The details of the beach management plan would still need to be decided but it may also be where innovative solutions to coastal hazards can be developed. Additionally, in response this and to other commenters (21, 23, and 26), a list of examples of community programs that encourage innovation was added to proposed CAP Policy 2.18.*

*EcoDistricts are a concept where the local community is engaged in sustainable planning. EcoDistricts could be proposed within the framework for neighborhood-scale plan outlined in proposed CAP Program 4.7, where there could be a more focused approach to addressing the localized neighborhood issues and concerns.*

**Comment:** Will the County be considering ways to connect with the community? There could be a coastal safe council, similar to a fire safe council (1). Is the County considering creating a special assessment district (3)?

*Response: General Plan "Hazard-G Communication Program for Property Owners at Risk from Sea Level Rise" currently requires Planning staff to periodically inform the Board of Supervisors and local landowners about sea level rise planning efforts. A coastal safe council could be created to recruit experts to consult with coastal landowners regarding adaptation strategies for coastal hazards, but this would require future funding and Board of Supervisors direction if it involves County staff. Further, there are regional aspects for sea level rise where a coastal safe council concept might engage other jurisdictions. The creation of such an organization is not currently included in the proposed amendments, but could be developed through proposed Program 4.10 for regional sea level rise planning.*

*Similarly, a special assessment district could be a useful tool to fund sea level rise adaptation projects but would also require Board of Supervisors direction and potentially a voter initiative. This financing tool could be studied in a neighborhood-scale adaptation plan, or a regional plan, both of which would be future actions and not part of the County's first steps on sea level rise planning.*

**Comment:** On January 1, 2012, nearly 200 square miles became protected by the historic Marine Life Protection Act but Mussel Shoals was not included despite having Coastal Commission designated tide pools. How can Mussel Shoals be included? Can we get signage to protect the tide pools (16)?

*Response: The California Department of Fish and Wildlife is responsible for planning, implementing and managing the marine protected areas as designated by the Marine Life Protection Act. The Marine Protected Areas are revised every decade. Inquiries about expanding the Marine Protected Areas should be submitted to the California Department of Fish and Game.*

*Depending on how the tidepool signs are designed and where they are located, a permit may be required by the Coastal Commission and/or the Ventura County Planning Division.*

*There may be an opportunity for new tidepool signs, with the Rincon Pier Decommissioning Project. The Rincon Pier Decommissioning Project involves the Rincon Island, the causeway connecting the mainland to the island, a State Coastal Conservancy owned parcel, and the onshore property. Once the Rincon Pier Decommissioning Project is completed, there is the potential for new coastal dependent uses. The State Coastal Conservancy owned parcel has tidepools and tidepool signs could be included in proposals to develop the parcel. If the State Coastal Conservancy requests comments for uses on the parcel, the Planning Division can submit a comment requesting tidepool signs.*

**Comment:** Airbnb's should be further restricted and property owners should be informed of the sea level rise threat (2 & 20).

*Response: Airbnb's in the coastal zone are regulated by CZO Section 8175-5.21, which was adopted on June 12, 2018. The CZO requires a permit for home shares and short-term rentals on an annual basis and no revisions are proposed to these regulations because there is no directive to revise those regulations for the coastal zone. The proposed CAP amendments include Policies 1.34(a) and 1.34(b) that would require the coastal hazard report to be recorded and requires disclosure statements that notifies future property owners that the property is located within a Coastal Hazards Screening Area.*

**Comment:** Is it possible to correct the elevation level for my residence to reduce my FEMA flood insurance premium (7)?

*Response: This commenter was connected to the Public Works Agency to assist with FEMA flood elevation revision requests.*

## **Planning for New Development**

There were changes made to the proposed LCP amendments in response to public comments summarized in this section. Draft Table 1 was revised to require commercial and residential development to be designed with an expected life of 100 years instead of 75 years (10 & 30).

**Comment:** Development should plan for a longer time horizon of 200 years rather than just 75 years since residences last longer than 75 years. This would allow property owners the flexibility to plan for sea level rise at their own expense (10 & 30).

*Response: In response to this comment, Table 1 was revised to allow residential and commercial structures to be designed with an expected life of 100 years, but 200 years is likely too long due to the significant change that would be required for the building elevations.*

*The commenter inquired with Coastal Commission staff regarding the basis for the State guidance recommending to plan for 75 to 100 years for residences and this inquiry revealed the guidance was based on a City of Malibu policy and has generally been applied by the Coastal Commission since 2002. The commentor also provided analysis of California Housing Stock, as shown in the chart below, as well as analysis from 1998 of home ages nationally based on the Department of*

*Housing and Urban Development and the Census Bureau's American Housing Survey. This analysis summarized that mean average timespan for single family homes was 180 years.*

*Planning staff analyzed Assessor year-built data to determine the age of residential structures along the shoreline in the North and South Coast areas. In the North Coast, less than 1% of the structures were 100 years old or older with the oldest home on record built in 1920. In Coastal Hazards Screening Area A in the South Coast Area, the oldest structure was built in 1947, just over seventy-five years old. The median structure was built in 1974, indicating that the median house age is about 50 years old.*

*This information indicates there is relatively frequent redevelopment of homes on Ventura County's coast compared to the national/statewide average. This may be due to the more intensive natural environmental conditions characteristic of the coastline that requires more maintenance of development than inland areas. It may also be due to the evolving use of these homes, which were originally built as small summer beach cottages, then rebuilt into permanent homes, and now are being redeveloped again, possibly due to perceived high investment values.*

*Proposed CAP Policy 1.4 would require new residential and commercial principal structures to be designed for the "Intermediate-High" scenario and a 100-year lifespan. According to the sea level rise scenarios for Santa Barbara in the Ocean Protection Council 2024 Sea Level Rise Guidance update and Coastal Commission Draft 2024 Sea Level Rise Guidance (Table F-10, below), this would require planning for 6.6 feet of sea level rise by year 2130 (assuming the new development occurs 2025 in North Coast). The latest date in this guidance is for 2150, and the same scenario described above would require design for 7.9 feet of sea level rise. The commentor also provided data from the Intergovernmental Panel on Climate Change (IPCC) that indicates 200 years from now there could be between 15.2 to 34.1 feet of sea level rise, as shown below. The recent sea level rise guidance released by the State Ocean Protection Council (second image below) only provided sea level rise projections to 2150.*

**Sea Level Rise Estimates, in Feet** (Highlighted cells compare conservative estimates for 75 and 200 years. Other cells show higher numbers are justified too.)

Years from Now	Date	Santa Barbara or Santa Monica Gauge <sup>11</sup>		IPCC AR6 83rd percentile, 5°C, interpolated between 2100 & 2300 <sup>12</sup>	
		Int-High	High	Without marine ice cliff instability	With marine ice cliff instability
75	2100	4.5 or 4.6	6.3 or 6.4	3.4	3.4
125	2150	7.6 or 7.9	11.3 or 11.5	8.2	15.7
150	2175			10.5	21.8
175	2200			12.9	28.0
200	2225			15.2	34.1
275	2300			22.3	53.1

<sup>10</sup> 2024 OPC guidance, page 9,

<http://opc.ca.gov/wp-content/uploads/2024/05/Item-4-Exhibit-A-Final-Draft-Sea-Level-Rise-Guidance-Update-2024-508>.

<sup>11</sup> 2024 OPC guidance, page 90,

<http://opc.ca.gov/wp-content/uploads/2024/05/Item-4-Exhibit-A-Final-Draft-Sea-Level-Rise-Guidance-Update-2024-508.pdf> Another source is <https://sealevel.nasa.gov/task-force-scenario-tool>

<sup>12</sup> IPCC AR6, Climate Change 2021, *The Physical Science Basis*, pages 1305-1306 <https://www.ipcc.ch/report/ar6/wg1/> gives a range of estimates for each scenario, from the 17th to the 83rd percentile. The only estimates they give for 2300 are for 1.5°C, which we have already reached, and 5°C, where they say,

- “between 1.7 and 6.8 m by 2300 in the absence of MICI” and
- “Incorporating Antarctic results from a model with MICI..., leads to... 9.5-16.2 m” and “up to 16 m considering MICI” (marine ice cliff instability)

Interpolations and conversions from meters are at

[https://docs.google.com/spreadsheets/d/11JdD50ziFw\\_qL3GY4F11iCUpq8umToFTLdy6gSWc7pw/edit?gid=0#gid=0](https://docs.google.com/spreadsheets/d/11JdD50ziFw_qL3GY4F11iCUpq8umToFTLdy6gSWc7pw/edit?gid=0#gid=0)

YEAR	LOW	INT-LOW	INTERMEDIATE	INT-HIGH	HIGH
2020	0.1	0.2	0.2	0.2	0.2
2030	0.2	0.3	0.3	0.3	0.4
2040	0.3	0.4	0.4	0.5	0.6
2050	0.3	0.5	0.6	0.9	1.1
2060	0.4	0.6	0.9	1.4	1.8
2070	0.5	0.7	1.2	2.0	2.7
2080	0.5	0.9	1.6	2.8	3.8
2090	0.5	1.1	2.1	3.5	5.0
2100	0.6	1.2	2.8	4.5	6.3
2110	0.6	1.4	3.4	5.3	7.5
2120	0.7	1.5	4.0	6.0	8.6
2130	0.7	1.7	4.4	6.6	9.5
2140	0.7	1.9	4.9	7.1	10.4
2150	0.8	2.0	5.5	7.6	11.3

*The proposed amendments that call for planning about 6.6 feet of sea level rise for redevelopment of residential structures is consistent with the sea level rise amounts evaluated in the Vulnerability Assessment Report. Generally, this amount can be accommodated through design features without fundamental changes to the character of existing communities. The VC Resiliency Vulnerability Assessment was limited to an evaluation of up to five feet of sea level rise.*

*However, to address the request for a longer time horizon for residential and commercial*



*structures, proposed Policy 1.4, Table 1, has been updated to require residential and commercial structures to be designed for a 100-year intermediate-high sea level rise scenario instead of 75 years.*

**Comment:** The CAP reference to the “208” Areawide Water Treatment Management Plan, a study of septic tank problems in the Santa Monica Mountains for the establishment of a septic system management entity is an outdated reference from 1980 and should be replaced by text describing the Ventura County Local Agency Management Plan. Also, the proposed Coastal Hazard Analysis Report requirements in the proposed Appendix H of the CZO would benefit from including analysis of proposed septic systems (29).

*Response: In response to this comment, the reference to the “208” Plan Septic Tank Problem Area-Santa Monica Mountains Study has been removed and the Appendix H Coastal Hazards Analysis Report has been updated to include analysis of onsite wastewater treatment systems during the siting and design process for new development.*

**Comment:** The County should consider limiting the size and scale of homes, keeping more in line with the concept of managed retreat (24). Managed retreat should only be considered in areas where relocation of development is possible and where property owners can defend their homes, businesses, and related infrastructure (21). My overall general comment from the Workshop is commending the County on taking an approach that does not involve seawalls and armoring of the coast, but rather a managed retreat (20).

*Response: During this initial phase of planning for sea level rise managed retreat is a voluntary option for willing landowners, as described in proposed CAP Program 4.8. Managed retreat may be comparatively more suitable for areas where there is limited development. Existing development would continue to be allowed to utilize existing shoreline protective devices, but the proposed amendments would enact some limitations on new shoreline protective devices, as described further in the Shoreline Protective Devices Section of this exhibit.*

*Proposed CAP Program 4.8 states that the County should seek state and federal funding for a program to voluntarily reduce development intensity in vulnerable coastal areas in coordination with willing landowners. This funding could possibly be used to purchase coastal property that is leased until hazards are imminent, or to transfer development rights to reduce development in hazardous coastal areas, or to acquire rolling easements that are phased based on increases in sea level rise or other measurable criteria.*

**Comment:** Will property owners be required to retrofit their properties at some point? What is the expectation of insurance availability for owners that do not retrofit their properties (5)?

*Response: The proposed amendments do not require property owners to retrofit their properties, but if a principal structure is “substantially redeveloped” (see proposed CAP Policy 1.9) design for sea level rise resilience would be required. Property owners may voluntarily choose to retrofit their properties and consider if changes to their home would qualify as substantial redevelopment.*

*Insurance inquiries are best directed to insurance companies. If a property is designed for resilience to sea level rise and other coastal hazards, comparable insurance premiums may become lower. Furthermore, when local regulations reduce vulnerabilities to floods, the*

improvements can increase the County's Community Rating System (CRS) score, which is a Federal Emergency Management Agency (FEMA) program that assigns communities a rating from 1 to 10 based on their floodplain management practices. Communities with higher ratings receive discounts on flood insurance premiums.

**Comment:** Who pays for the collateral damage caused by a non-retrofitted building during a storm (5)?

*Proposed CAP Policy 1.32 states that the owner of private development which falls or breaks away from the main structure is responsible for the lawful recovery, removal and disposal of debris associated with their property. The responsibility for damage caused by a non-retrofitted property to a retrofitted property could be a civil matter between the two parties. See the comment below regarding the connection of non-habitable accessory structures that led to a revision to the proposed CZO standards for connections of structures.*

**Comment:** Draft CZO Section 8175-3.6(b) should be revised to state the following: "In Screening Area A, stairs and elevators shall be designed so they do not break away in design floods and non-habitable accessory structures such as decks, stairs, spa, and sheds shall be designed so they break away without causing any damage to the structural integrity of the building on which they are used or any buildings to which they might be carried by flood waters ~~structurally disconnected from the principal structure and designed to: (i) be removed voluntarily or upon lawful order or directive if imminently threatened or damaged beyond repair by coastal hazards (e.g., erosion, bluff failure, or wave hazards) and (ii) break apart during hazardous conditions if timely removal is not completed. In accordance with Section 4.1.6, Policy 1.12 of the Ventura County Coastal Area Plan, uncovered porches and decks, and other accessory structures or landscape features are not entitled to shoreline protective devices~~ (10)." [Added sections are underlined and removed sections are strikethrough.]

*Response: As a result of this comment, additional research was conducted into the types of non-habitable structures that should be designed to break way during a flood event. That research indicated that some types of accessory structures should be anchored and others should be designed to break away. Stairs below the design flood elevation should be designed to be fastened to a foundation and designed for flood waters to pass through<sup>2</sup>.*

Draft CZO Section 8175-3.6(b) was revised and is proposed as follows:

Standards for connections of non-habitable accessory structures located seaward of the principal structure of lots in Coastal Hazards Screening Area A (see Appendix H1) are as follows:

1. Shall be connected to the principal structure when built at or above the design flood elevation and:
  - i. Cantilevered to avoid the use of a caisson foundation or other similar support structure; or
  - ii. Included in the principal structure.

<sup>2</sup><https://assets.ctfassets.net/pc5e1rlgrov/6kUmAzZn2jNxWCO6s6z12U/8543ca9e53a3361068da361799b3c274/fema-decks-pools.pdf>

2. Shall be disconnected from the principal structure when built below the design flood elevation and:
  - i. Decks, air conditioning units, landscape features, and stairs shall be resilient to coastal hazards by being anchored, with flood vents, and/or have open design;
  - ii. Portable spas, barbeques, sheds, and other structures that are not anchored shall be designed to be removed voluntarily or upon lawful order or directive if imminently threatened or damaged beyond repair by coastal hazards, and to the extent feasible be designed to break apart and not cause damage to the principal structure or nearby structures if the accessory structure falls onto a beach or other shoreline area, into the ocean, or is impacted by slope failure from a bluff;
  - iii. The use of a caisson foundation or other similar support structures are prohibited;
  - iv. Electrical equipment, elevators, and connections shall be sheathed, sealed and waterproofed; and
  - v. Accessory structures, such as decks, are not entitled to shoreline protective devices.

*Proposed CAP Policy 1.30 also included minor adjustments for consistency with the revised CZO amendments shown above.*

**Comment:** The proposal of raising foundations potentially increases the possibility of seawater passing under homes and causing flood damage to existing infrastructure of Pacific Coast Highway, underground utilities, and even the railroad. This seems the opposite of resilient development (24).

*Response: The land uses in the proposed Coastal Hazards Screening Areas will be increasingly vulnerable to coastal hazards and sea level rise. Caltrans and Union Pacific are encouraged to develop adaptation plans for highways and the and rail line in proposed CAP Policy 1.5 and Program 4.11. Proposed CAP Policy 1.2 also requires new development and substantial redevelopment “neither create nor contribute significantly to erosion, geologic instability, or destruction of the site or surrounding area.” This may require that proposed new development and substantial redevelopment permit applications submit a Geologic Hazards Analysis Report that confirms this.*

## **Roads and Railway**

There were no changes made to the proposed LCP amendments in response to the public comments summarized below.

**Comment:** Aren't the railroad tracks vulnerable (9)?

*Response: Railroad tracks near the coast are susceptible to coastal hazards and sea level rise. Draft CAP Program 4.11 would direct the County to coordinate with Caltrans and Union Pacific Railroad for adaptation planning for the railroad, Highway 101, and related infrastructure.*

**Comment:** Caltrans has recognized and agreed that the Seacliff revetment, which is owned by our HOA, is necessary to protect homes at Seacliff, but also the 101 off ramp and Highway 1 (23). Coastal shoreline protective devices protect private property and Rincon highway, which provides public access to public beaches (26).

*Response: The proposed amendments would not require the removal of existing shoreline protective devices.*

**Comment:** The intersection of Ocean Avenue and Breakers Way is not an intelligent turn around for automobiles. The Mussel Shoals community does not have any turn arounds that work (16).

*Response: Ocean Avenue is a County maintained road and Breakers Way is a private road. This project is focused on planning for sea level rise and coastal hazards. This comment on the design of the County-maintained road on Ocean Avenue has been provided to the Ventura County Public Works Agency.*

## **Sea Level Rise Models**

There were changes made to the proposed LCP amendments in response to public comments summarized in this section. Proposed Policy 1.3 was revised to include both the Santa Barbara and Santa Monica tide gauges when evaluating development in the Coastal Hazard Areas (26).

**Comment:** It is possible that sea level rise may rise more quickly than projected. Sea rise models may not reflect how quickly sea level rise would impact Ventura County coastline if the Thwaites Glacier melts more quickly than projected (9, 18).

*Response: The Ocean Protection Council (Council) published updated statewide guidance on planning for sea level rise earlier this year that is in the process of being adopted by the Coastal Commission. The 2024 guidance replaced the 2018 version and stated that there will be an update every five years to reflect changes in scientific guidance. Proposed CAP Program 4.2 would require an update at least once every 10 years to the County's Vulnerability Assessment adaptation plans, and the Local Coastal Program based on new sea level rise science and monitoring results. Proposed CAP Program 4.5 would require that an update on the rate Sea Level Rise be presented to the Board of Supervisors at least once every 5 years, and that this presentation would inform whether updates to the policies are needed.*

**Comment:** Regarding Table 1 in the proposed amendment, why require the "Intermediate-High" scenario when the Ocean Protection Council 2024 Report notes that the "The Intermediate Scenario" provides a reasonable upper bound for the most likely range of sea level rise by 2100."

At a warming of 3 °C in 2100, the probability of exceeding this scenario is 5 percent. The County might consider allowing the intermediate scenario in certain circumstances (17).

*Response: In response to this comment, the "Intermediate-High" scenario is recommended by the Coastal Commission guidance for local policies and would result in new principal residential, commercial, and industrial development. Such development proposed in 2025 would plan and design for 6.6 feet of sea level rise for an expected life of 100 years (in North Coast using the Santa Barbara Tide Gauge and rounded to the nearest scenario decade). Comparatively, the Intermediate Scenario would require 4.4 feet (see table below). The "Intermediate" scenario is*

proposed to be used for less intensive uses such as recreational facilities.

STATE OF CALIFORNIA SEA LEVEL RISE GUIDANCE

**TABLE 10. Sea Level Scenarios for Santa Barbara.**

*Median values of Sea Level Scenarios, in feet, for each decade from 2020 to 2150, with a baseline of 2000. All median scenario values incorporate the local estimate of vertical land motion.*

YEAR	LOW	INT-LOW	INTERMEDIATE	INT-HIGH	HIGH
2020	0.1	0.2	0.2	0.2	0.2
2030	0.2	0.3	0.3	0.3	0.4
2040	0.3	0.4	0.4	0.5	0.6
2050	0.3	0.5	0.6	0.9	1.1
2060	0.4	0.6	0.9	1.4	1.8
2070	0.5	0.7	1.2	2.0	2.7
2080	0.5	0.9	1.6	2.8	3.8
2090	0.5	1.1	2.1	3.5	5.0
2100	0.6	1.2	2.8	4.5	6.3
2110	0.6	1.4	3.4	5.3	7.5
2120	0.7	1.5	4.0	6.0	8.6
2130	0.7	1.7	4.4	6.6	9.5
2140	0.7	1.9	4.9	7.1	10.4
2150	0.8	2.0	5.5	7.6	11.3

Proposed CAP Programs 4.1 and 4.2 state that the County will use the best available science for assessing projects in hazardous coastal areas and update the Vulnerability Assessment, Adaptation Plans, and the Local Coastal Program a minimum of every ten years, or sooner if feasible. While the sea level rise projections beyond 2100 include more uncertainty, the County proposes to follow Coastal Commission Guidance for the sea level rise scenario and expected lifespan of structures, including residential, commercial, and industrial buildings. “Table 1 – Expected Life and Sea Level Rise Scenarios for Coastal Development, Identified by Proposed Use,” outlines projected lifespan and identifies the sea level rise scenario that each use must plan for. Some structures may use the intermediate scenario but residential and more permanent structures are required to use the intermediate-high scenario. The intent behind choosing the intermediate-high scenario is to ensure that the buildings last for their full lifespan. Structures that are meant for human occupancy are assigned to the intermediate-high scenario. Overall, while this comment suggests the County should plan and design for lower amounts of sea level rise, other comments suggested planning and design for higher amounts of sea level rise. For the County’s initial sea level rise regulations, planning for about 6.6 feet of sea level rise represents a balanced approach that includes a measure of precaution.

**Comment:** We advise the County not to require strict compliance with the Federal Emergency Management Agency's (FEMA) Flood Insurance Rate Maps since FEMA-55 Coastal Construction Manual were designed for east and gulf coast states to mitigate against hurricane storm surge. Applicants should be allowed to decide if they wish to participate in the FEMA flood insurance program (17).

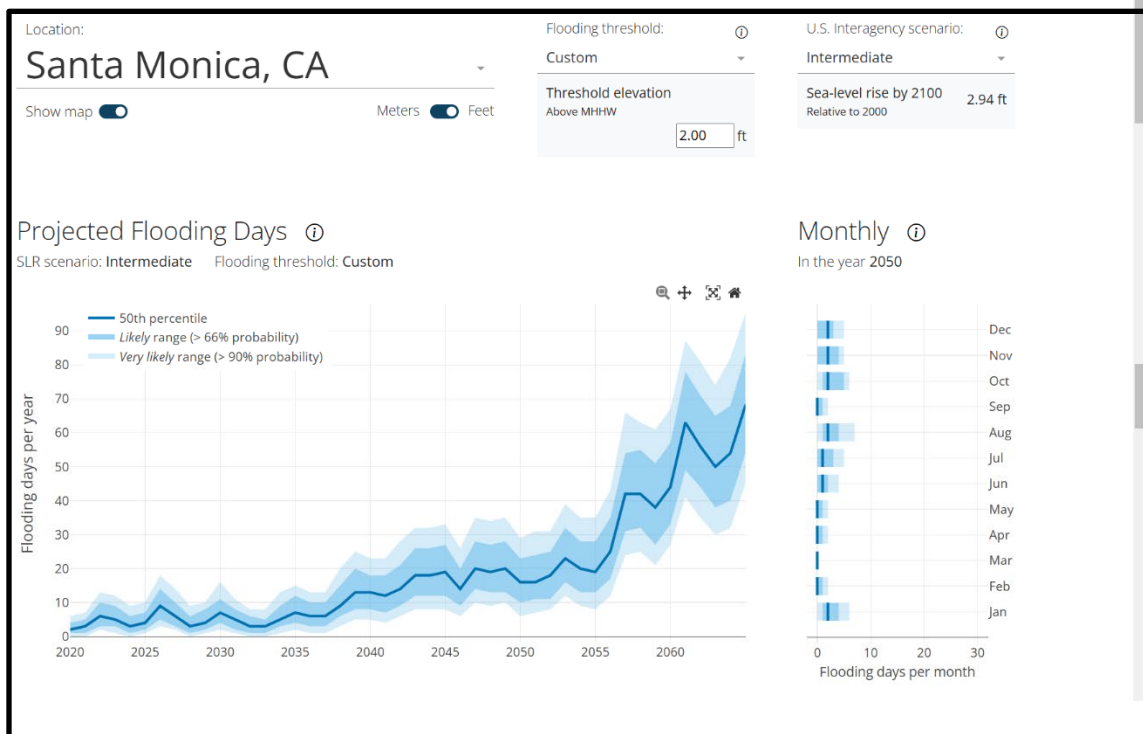
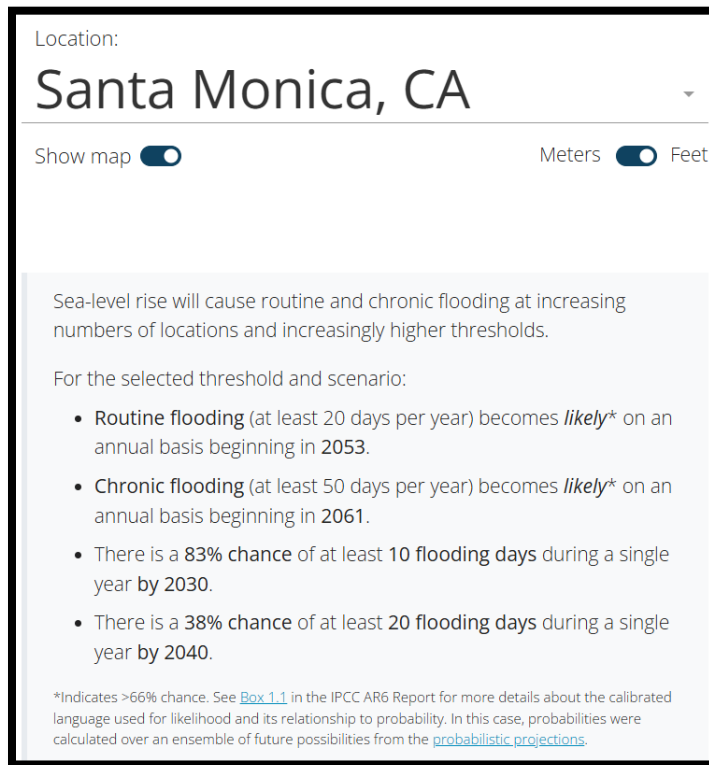
*Response: The County's Public Works Watershed Protection Ordinance requires development in Special Flood Hazard Areas to be designed for 1 percent annual chance flood events, and these areas include the "V" zones along some shoreline areas with a 1% or greater chance of flooding and an additional hazard associated with storm waves. Due to the County's class 5 rating in the National Flood Insurance Program Community Rating System, property owners are eligible for a 10-25% discount on flood insurance premiums. This rating and thus the discount, would be at risk if structures were not developed to meet FEMA guidance if the commentor's suggestion was to be implemented.*

*The proposed amendments aim to be consistent with other County ordinances and regulations. The Watershed Protection Ordinance is not planned to be amended with this project.*

*Even with shoreline protective devices, the Coastal Hazards models show that flooding may occur behind these devices and so elevating development would help protect the principal structures that undergo substantial redevelopment from ground-floor flood damage. The chart below is from a NASA Flood Analysis model<sup>3</sup> and it shows the number of days annual flooding (2 feet above the mean high-water mark is the flood threshold) for the nearest location that the model analyzed, Santa Monica. It shows with the Intermediate Scenario, and at the 50<sup>th</sup> statistical percentile, there will be 4 flooding days per year in 2025, 16 flooding days per year by 2050, and 68 flooding days per year by 2070. The model also shows this dialogue box that summarizes NASA's analysis:*

<sup>3</sup> <https://sealevel.nasa.gov/flooding-analysis-tool/projected-flooding?station-id=9410840&threshold=061>





**Comment:** Draft CAP Policy 1.3 uses the best available scientific data for the Santa Barbara tidal

gauge. The Santa Monica tidal gauge provides a longer and more accurate record of actual tides for the last 100 years (26).

*Response: In response to this comment, staff researched the Santa Monica tidal gauge and the Santa Barbara tidal gauge. The Santa Monica tidal gauge was first established on October 1, 1932. The Santa Barbara tidal gauge was established on February 26, 1974.*

*The Public Works Agency (Watershed Protection District) reviews the coastal flood analysis for proposed development. Port Hueneme Harbor serves as the demarcation line between projects in the northern part of the County and the southern part of the County. Projects north of Port Hueneme Harbor use the Santa Barbara tidal data and projects south of Port Hueneme Harbor use the Santa Monica tidal data.*

*Proposed CAP Policy 1.3 now includes the following text “Continue to use the best available science on coastal hazards and sea level rise, including the best available scientific data for the Santa Barbara Tide Gauge for projects north of the Port Hueneme Channel and the Santa Monica Tide Gauge for projects south of the Port Hueneme Channel, to review new development and development that qualifies as substantial redevelopment located in hazardous coastal areas and for sea level rise adaptation strategy development.”*

*In terms of the State guidance, the differences for projected sea level rise according to each tide gauge are a couple of inches and would not result in substantial differences in the design of new development as a result of the proposed amendments.*

**Comment:** [1] Draft CAP Policy 1.3 artificially limits sources to consider when discussing best available science. This type of limitation is wrong as it specifies that State guidance must be used (even if it is not the best available science). As written, this policy requires state guidance to be considered at the exclusion of other sources of science, including those published by the National Oceanic and Atmospheric Administration (NOAA). [2] Any regulating guidance that does not comply with the Administrative Procedures Act should not be considered (26).

*Response: See the previous response to comment for more information on the revision to proposed CAP Policy 1.3. Overall, proposed CAP Policy 1.3 principally relies on data from the Santa Barbara Tide Gauge and the Santa Monica Tide Gauge to track and monitor sea level rise. The response to this comment is further separated into two different categories as shown below.*

*[1] In response to this comment, the 2024 the Ocean Protection Council replaced the 2018 version and is the fourth version of the statewide guidance since 2010, averaging a new update every 3.5 years. The Council has stated that there will be an update every five years to reflect changes in scientific guidance. The 2024 guidance was:*

- Created in partnership with the Ocean Science Trust and scientific task force;*
- Peer reviewed by an external scientific panel that included NOAA and NASA; and,*
- Incorporated the 2022 report by NOAA about global and regional sea level rise scenarios, which is based on global projections from the Intergovernmental Panel on Climate Change.*

*[2] The Administrative Procedures Act (Act) requires that the public be provided with ways to*

*participate in the adoption of State regulations and to ensure that the regulations are clear and legally valid. Before the Ocean Protection Council adopted the 2024 Science and Policy Update, there was a public comment period and four virtual regional workshops, before it was adopted on June 4, 2024. Questions on whether the Science and Policy Update complies with the Act, should be directed to the California Office of Administrative Law.*

## **Sediment Management**

There were changes made to the proposed LCP amendments in response to public comments summarized in this section. Draft Policy 2.18 was amended to encourage community programs such as offshore reefs, seafloor kelp restoration, and offshore islands for marine mammals (11, 21, 23, 26). Draft Policy 2.8 was amended to clarify that beach nourishment should mimic naturally occurring sediment on site (26). Draft Policy 2.15 was revised to include Caltrans as a partner agency for sediment management plans (25).

**Comment:** The construction of artificial reefs must be made a high priority. Benefits include shoreline protection because wave intensity and shoreline erosion are reduced, new habitat for marine organisms is created, water quality is improved and carbon is sequestered (11, 23, 26). There is potential for artificial reefs in the most vulnerable areas, such as Point Mugu, Port Hueneme, McGrath State Beach, and near coastal neighborhoods (21). Sea mammals would benefit from islands offshore that would keep them off the roadways, parking areas, and private property (9). The County should include innovative ideas such as a sandy seafloor kelp restoration project, beach sea gardens, and tidal fishing waters (11).

*Response: The County has jurisdiction over lands above the mean high tide line, and submerged land seaward of the mean high tide line is in the Coastal Commission's and State Land's Commission's, and even federal jurisdictions. Projects for artificial reefs, kelp floor restoration, and other sand retention structures that are offshore must be approved by the Coastal Commission and Army Corps of Engineers. However, proposed CAP Program 4.6 would support the establishment of an in-lieu fee that could be used to support funding for beach replenishment and off-shore reefs, but the County would in most cases need to rely on other agencies to authorize a permit for these uses. That being said, the following proposed CAP policies support sediment management and off-shore reefs:*

- *Proposed CAP Policy 2.2 encourages activities that trap or add sand.*
- *Proposed CAP Policy 2.4 encourages adaptation measures that mimic natural landforms and support habitats.*
- *Proposed CAP Policy 2.8 encourages beach nourishment and the placement of sediment at various locations along the shoreline.*
- *Proposed CAP Policy 2.15 states the County should work with The Beach Erosion Authority for Clean Oceans and Nourishment (BEACON) and neighboring cities regarding common goals and objectives for sediment management.*
- *Proposed CAP Policy 2.18 supports preservation of coastal fisheries and marine resources. This policy was amended to include offshore reefs, seafloor kelp restoration, and offshore islands for marine mammals.*

**Comment:** There needs to be more specific strategies on ensuring sediment makes it to the

coastlines/beaches from upland watersheds (27).

*Response: Proposed CAP Policy 2.6 would require discretionary projects that affect sediment supply to watershed and beaches should limit those sediment impacts so the sediment is retained within and feeds into the Santa Barbara Littoral Cell or portions of the Zuma Littoral Cell that are located within Ventura County. Proposed CAP Program 4.6 would support the establishment of an in-lieu fee that could be used to support funding for sediment management projects.*

**Comment:** Please include Caltrans for any regional sediment management plans along the State Right of Way (25).

*Response: Draft CAP Policy 2.15 was updated to include Caltrans as a partner agency for sediment management.*

**Comment:** There were no considerations for cumulative down-coast studies to determine if there would be deficits to coastlines and beaches when a new groin/revetment structure would be established to protect new development. Proposed CAP Policy 1.14 should be clearer and ensure that any shoreline protective devices should be a part of a larger plan to avoid a checkerboard pattern of shoreline protective devices (27).

*Response: Proposed CAP Policy 1.14 requires shoreline protective devices to be sited and designed to eliminate or mitigate adverse impacts to beaches and local sediment supply to the extent feasible and any impacts would need to be mitigated. It references proposed CAP Policy 1.12 and this policy references the sections of the Coastal Act that allow shoreline protective devices. Coastal Act Section 30235 describes that “revetments, breakwaters, groins, harbor channels, seawalls, cliff retaining walls, and other such construction that alters natural shoreline processes shall be permitted when required to serve coastal-dependent uses or to protect existing structures or public beaches in danger from erosion and when designed to eliminate or mitigate adverse impacts on local shoreline sand supply”. This regulation focuses on site-specific projects and would not allow local jurisdictions to prohibit shoreline protective devices based on reasoning they are not included in a larger plan. Approximately two thirds of the County’s unincorporated coastline is already protected by shoreline protective devices and more adaption planning and design needs to be completed before these devices could be removed or reduced in scale. Policies that lead to gaps in the line of shoreline protective devices would increase impacts to nearby properties that are not yet designed for sea level rise adaptation.*

*The proposed CAP Policy 1.27 requires that coastal development permit applications for shoreline protective devices be evaluated for the project’s effect on upcoast and downcoast shoreline protective devices, coastal resources, net littoral drift, and beaches. This policy would be implemented through the Draft Appendix H1, Coastal Hazards Analysis Report Requirements and particularly subsection H.3.c which requires analysis of future conditions at the site of shoreline development, and subsection H.4.f.7 which would require analysis of the long-term effects of the shoreline protective device on sand supply.*

**Comment:** The sections in draft CAP Policy 2.8 that place restrictions on the physical characteristics of acceptable beach replenishment material should be deleted. This section would likely have prevented the cobble material from being added to Surfer’s Point. As science develops, the criteria will change, and the restrictions will be counterproductive to preventing the

narrowing of beaches (26).

*Response: The intent of beach replenishment is that the fill material matches the natural shoreline characteristics. This means that the sediment must match the proposed shoreline project location to ensure that it is appropriate for beach replenishment. The United States Army Corps of Engineers has nationwide requirements for beach replenishment materials and states that fill is usually required to be of a texture acceptable for beach-goers.<sup>4</sup> A report from Beach Erosion Authority for Clean Oceans and Nourishment report states that nourishment can have adverse impacts to beaches when pursued haphazardly<sup>5</sup>.*

*As a result of this comment the policy was amended to allow sediment that matches naturally occurring native materials, such as cobble, if cobble rocks naturally occur on the beach. Amended policy is shown below with new text underlined:*

*"The placement of sediments at appropriate points along the shoreline may be permitted for the purpose of beach replenishment if the source material proposed for deposition contains the physical (e.g., grain size and type), chemical, color, particle shape, debris, and other compatibility characteristics that are appropriate for beach replenishment and mimic native naturally occurring sediment characteristics occurring at the site."*

**Comment:** The debris basins maintained by the Ventura County Public Works Agency are regularly excavated and materials that could be used for beach replenishment are hauled off to landfills. All the material excavated by Flood Control needs to go towards beach replenishment. The mitigation measures in the draft CAP Policy 1.14 do not address the Flood Control practices (26).

*Response: Proposed CAP Policy 1.14 focuses on mitigation of impacts from shoreline protective devices, but it is possible for the in-lieu fee described in the policy to be used to assist with transport of sediment from the debris basins. The process of manually transporting sediments and permitting its deposition onto shoreline can be costly and complex due to overlapping state and federal regulations. The process requires sampling the sediment for appropriate shape and size for the intended site, and also pre-testing for levels of toxicity.*

*As described in the previous comment, proposed CAP Policy 2.8 encourages beach nourishment projects but notes that there are standards to ensure that the sediment is appropriate for beach replenishment. This minimizes the adverse impacts to the beach, intertidal and offshore resources. The timing of sediment placement is also important to ensure that when the waves and currents interact with the new sediment, most of it will remain on the beach and not be swept offshore.*

*Since the debris basins are generally not located in the coastal zone, the proposed LCP amendments would not apply to development or maintenance activities in those basins. This comment will be forwarded to the Public Works Agency.*

<sup>4</sup> <https://www.iwr.usace.army.mil/Missions/Coasts/Tales-of-the-Coast/Corps-and-the-Coast/Shore-Protection/Beach-Nourishment/>

<sup>5</sup> <https://beacon.ca.gov/wp-content/uploads/2021/03/Managing-Sandy-Beach-Ecosystems.pdf>

## Shoreline Protective Devices

There were no changes made to the proposed LCP amendments in response to public comments summarized in this section.

**Comment:** It is vital to avoid shoreline armoring as the primary response to coastal hazards. All forms of armoring make erosion worse, takes up beach space, impacts lateral coastal access and coastal habitats, and is unsightly. It is primarily used to protect private property at the expense of public resources and public trust land (18).

*Response: Shoreline protective devices have historically been used to protect the County's North and South Coasts from coastal hazards and most of the devices are used to protect Caltrans highways. They are also used to protect low-cost coastal visitor accommodation facilities such as the Rincon Parkway, County parks, and State parks facilities that accommodate many visitors who may not otherwise be able to afford to visit, access and recreate along the coast.*

*Proposed CAP Policies 1.12 and 1.17 would require alternative analysis when a discretionary permit for new shoreline protective device is proposed. Non-structural (e.g. nature-based solutions) solutions are preferred and must be evaluated and determined to be infeasible prior to authorization of a shoreline protective device. If the device is permitted, proposed CAP Policy 1.14 would require the impacts to be minimized and mitigated consistent with the LCP and Coastal Act.*

**Comment:** The Lindstrom v. California Coastal Commission (2019) case established that the Coastal Act prohibited the construction of shoreline protection for a new residence. Coastal Act Section 30253 firmly prohibits coastal armoring for new structures, and is not subject to a feasibility analysis. The County's proposed definition for "existing structures" to continue with shoreline protection devices, the Coastal Act Section 30235 does not allow for armoring of new structures. When the Coastal Act Sections 30253 and 30235 are read together, the legislative intent was to allow for some armoring for development that existed when the Coastal Act was passed but prohibited armoring for new development.

The County's proposed definition of existing development in proposed CAP Policy 1.12 would expand rights to shoreline armoring beyond the intent of the Coastal Act and is therefore unlawful. Existing development should be defined as any structure that existed before the effective date of the Coastal Act, January 1, 1977. New development and substantial redevelopment are not entitled to shoreline armoring and must be sited outside of coastal hazard zones. Coastal Act Section 30253 firmly prohibits coastal armoring for new structures, and is not subject to a feasibility analysis (18).

*Response: Proposed CAP Policy 1.12 would not expand the rights for shoreline protective devices (i.e. coastal armor) because it expressly states "Proposed shoreline protective devices shall be permitted in conformance with the LCP and Coastal Act Sections 30235 and 30253." The proposed policy also mirrors the applicable text in Coastal Act Section 30235 by stating the following:*

*"Revetments, breakwaters, groins, harbor channels, seawalls, cliff retaining walls  
[County's proposed Policy 1.12 consolidates these examples into "shoreline protective*

*devices”], and other such construction that alters natural shoreline processes shall be permitted when required to serve coastal-dependent uses or to protect existing structures or public beaches in danger from erosion and when designed to eliminate or mitigate adverse impacts on local shoreline sand supply.”*

*Proposed CAP Policy 1.12 also requires alternatives analysis to determine whether any less environmentally damaging alternatives can be used, and it references proposed CAP Policy 1.17 which requires alternatives analysis for non-structural solutions prior to authorization of a shoreline protective device. Proposed CAP Policy 1.12 concludes with a statement that the shoreline protective devices cannot be used for accessory structures.*

*The Coastal Act does not define the reference to “existing” in Section 30235 and the proposed LCP amendments mirror this Coastal Act provision. There have been different interpretations of this provision including the version from the commentor that “existing” equates to the date of Coastal Act approval, January 1, 1977. The commentor’s interpretation is consistent with State Coastal Commission guidance. Some local jurisdictions with a high prevalence of post-1977 development protected by shoreline protective devices, including the County of Ventura, have expressed concerns about interpreting “existing” under Section 30235 as limited to 1977 development. Residents and property rights organizations have opposed and challenged the “1977 interpretation” described above.*

*From a local land use planning perspective, the interpretation is problematic because County Assessor parcel data indicates that there are 116 principal structures in unincorporated Ventura County with shoreline protective devices that were built and permitted (by both the County and Coastal Commission) after 1977. Most of this post-1977 development is protected by a shoreline protective device has not been designed (e.g., elevated) for sea level rise resilience. The table below shows the principal structures built after 1977 with shoreline armoring from a 2020 analysis of principal structures.*

*Table Showing Principal Structures Built after 1977 with Shoreline Armoring*

<b>Subarea</b>	<b>Year Built Range</b>	<b>Number of Principal Shoreline Structures w/Armor</b>	<b>% of Principal Shoreline Structures w/Armor in Subarea</b>
North Coast	1977 to 2017	111	43%
South Coast	1977 to 2017	5	12%

*Application of the 1977 interpretation that would remove the right to have a seawall, would strip away a critical layer of regulatory protection for development that is not designed for sea level rise. The 1977 interpretation, if included in the proposed amendments, could decrease the safety of the existing built environment on the shoreline if legally permitted shoreline protective devices were no longer entitled. If applied locally, the 1977 interpretation could impact millions of dollars’ worth of real property, both shoreline protective devices and coastal residences. Statewide, this 1977 policy interpretation has significantly hindered the ability for local jurisdictions that have a high prevalence of shoreline protective devices to achieve certification of their locally adopted LCPs and to successfully plan for coastal hazards and sea level rise (e.g. Counties of Santa Barbara, Santa Cruz and Marin, and the Cities of San Clemente, Pacifica, Del Mar, Imperial Beach, etc.).*



*The County's proposed policy approach resembles the decision in the Lindstrom v. California Coastal Commission (2019) 40 Cal.App.5th 73 ("Lindstrom"), which the commentor noted "established that the Coastal Act prohibited the construction of shoreline protection for a new residence." The case determined whether the Lindstrom's newly permitted, yet-to-be-built residence, would now qualify as an "existing structure" under Coastal Act Section 30235 and would now qualify for a shoreline protective device, if needed. The Lindstrom's challenged the permit condition that required them to waive the right to any future shoreline protective device.*

*The court determined that the Coastal Commission's requirement that Lindstrom's waived future shoreline protection as a condition of their permit was consistent with the local LCP provision and Coastal Act. This case established that new development should be built to not need a shoreline protection over its lifetime, and LCPs could condition new development to waive any future right to a shoreline protective device. This case did not substantially address the 1977 interpretation.*

*The County's proposed amendments are similar to the outcome in the Lindstrom case because proposed CAP Policies 1.2 through 1.8 would require new development to be designed for resilience to sea level rise without reliance on a shoreline protective device (proposed CAP Policy 1.2). Proposed CAP Policy 1.13 would impose a similar condition that would prohibit new or enhanced shoreline protective devices for the new development that is required to be designed for resilience to sea level rise.*

**Comment:** Draft CAP Policy 1.13 is severely inconsistent with the Coastal Act and must be removed in entirety. New development is entitled to shoreline armoring if it is built within an "Existing Community." An "Existing Community" includes Rincon Point, La Conchita, Mussel Shoals, Seacliff, Faria, Solimar, and Rincon Parkway. This creates a loophole that would greatly expand shoreline armoring in the County perpetuate reliance on shoreline armoring for decades to come (18).

*Response: As state above, proposed CAP Policy 1.12 would not expand the rights for shoreline protective devices (i.e. coastal armor) because it expressly states "Proposed shoreline protective devices shall be permitted in conformance with the LCP and Coastal Act Sections 30235 and 30253." Proposed CAP Policy 1.13 would not allow new/enhanced shoreline protective devices but it would allows the property owner to repair and maintain the existing shoreline protective device in order to avoid creating gaps in the armor that protects an Existing Community. Proposed CAP Policy 1.13 states, "the permittee shall thereafter be prohibited from enlargement or extension of the shoreline protective device but may seek authorization to repair and maintain the device." Overall, the proposed amendments would reduce reliance on shoreline protective devices as new development and substantial redevelopment occurs.*

**Comment:** Based on my observations of erosion, the proposed ministerial permit pathway for limited coastal armor maintenance is imperative for the safety of beachgoers (9). Owners will be allowed to repair and maintain existing shoreline protective devices with a zoning clearance rather than through a Coastal Development Permit (CDP). But a CDP is required if mechanized equipment is needed on the beach to do the necessary repair and maintenance. Mechanized equipment should be allowed through some simplified process, without needing to obtain a CDP for residential communities where repairs must be done on the beach side. It should be easy to impose conditions that would protect the beaches (23). The conditional use permit requires going through the Coastal Commission (13).

*Response: California Government Code Section 13252 includes, and new CZO Section 8175-5.12.3 proposes, a ministerial pathway for property owners to conduct limited repair and maintenance of legally permitted shoreline protective devices. Repair and maintenance activities that would exceed the standards for a ministerial permit may be approved under a discretionary Coastal Development Permit (CDP).*

*A CDP is approved by the Ventura County Planning Division and/or Coastal Commission and allowed to add conditions such as a condition to protect the beach. Government Code Section 13252(a)(1)(D) states a CDP is required for:*

*“The presence, whether temporary or permanent, of mechanized construction equipment or construction materials on any sand area, bluff, or environmentally sensitive habitat area, or within 20 feet of coastal waters or streams.”*

**Comment:** We are concerned about sand flow and the restoration of rock riprap seawall will be impacted by the removal of the Rincon pier and causeway. Leave the existing pier and causeway, place rock riprap to protect our homes and seawalls (16).

*Response: The State Lands Commission is the lead agency for the decommissioning of the Rincon onshore and offshore facilities and the parcel at the foot of the causeway is owned by the State Coastal Conservancy. The County has been monitoring the decommissioning and submitted comments on the project. As of the August 29, 2024, State Lands Commission hearing, the causeway will be retained. Proposed CAP Policy 2.10 calls for the County to support including sea level rise adaptation strategies in the decommissioning project and future uses for the island and causeway.*

**Comment:** It would be useful for the CAP to state that shoreline protective devices can be increased or enhanced in response to sea level rise through a zoning clearance, without a Coastal Development Permit. Perhaps this can be incrementally tied to certain levels of sea level rise over time. This should be particularly so where the shoreline protective devices protect important infrastructure such as the Seacliff offramp, Highway 1, sewer lines, railroads, and etc. (23).

*Response: Ministerial permits, such as zoning clearances, do not require analysis or mitigation of potential environmental impacts. If the County were to propose policies that allow enhancement of shoreline protective devices without any analysis of impacts to coastal resources, those policies would not be consistent with the Coastal Act and would not be certified by the Coastal Commission.*

*In terms of planning phased shoreline protective device enhancements in unison with increasing rates of sea level rise, that could be an option for a future neighborhood scale plan effort and/or a programmatic permit similar to a beach management plan, but such a proposal could also be difficult to gain Coastal Commission support and approval. However coastal conditions may change and sea level rise rates may rapidly increase, catalyzing the need for State policies and guidance to further evolve as new science emerges.*

**Comment:** It would be helpful if the walkway near the jetty was repaired and the lighting would be fixed. A higher sea wall at Hobie Beach and Victoria would protect our homes from the rise of

ocean water, keep people safe, and keep people away from breeding seals. Ever since there have been more boulders, we have seen more sea life which has been great to see (15).

*Response: The Channel Islands Harbor is currently undergoing repairs to the entrance jetties and protective offshore breakwater. This lead agency for this project is the Channel Islands Harbor Breakwater and Jetty Repair Project was United Army Corps of Engineers (Army Corps), Los Angeles District. The comments about lighting, walkway repairs, and sea life have been provided to the Ventura County Harbor Department. With regards to a higher seawall, the Harbor Department is aware of the sea level rise vulnerabilities for the low-lying areas near Hobie Beach and proposed CAP Program 4.12 calls for multi-agency coordination to improve this area and increase resilience to sea level rise. Improvements would likely need to include more protections for the Silver Strand Community but also allow public access.*

## **Website and Outreach Notifications**

The website for the proposed Local Coastal Program Amendment was updated in response to a public comment. The webpage dedicated to the VC Resilient Coastal Adaptation Project was revised (9).

Comment: In my opinion, the meetings were not marketed or publicized widely and for a long enough period to inform community residents about the meetings. Additionally, having only one meeting date and time for each regional area seems too limited. I, for one, wanted to attend the Silver Strand area meeting but was unable to because of a conflict in my schedule (8). I applaud the County for putting on workshops but the majority of the residents were not aware of this event and associated plan (20).

*Response: The County mailed out 1,500 notices regarding the community workshops, emailed over 900 interested parties, and sent over 500 postcards to North and South Coast residents, as described in Section A above. The Public Information Officer posted a notification of the public review period and the community workshops on the County's Instagram and Facebook accounts which has an approximate following of nearly half-million followers. One workshop was scheduled for each of the unincorporated areas of the South, Central, and North Coast. A virtual workshop on Zoom was conducted and recorded to allow for feedback from attendees who could not attend the in-person meetings. Additional virtual workshops may be considered for future outreach opportunities.*

Comment: I find that the website language is hard to pass on to a more general audience or even advanced high school students (9).

*Response: In response to this comment, the website was revised to include photos, videos, and a project timeline.*

## **List of Commenters**

This section provides a list of the commentor names of the comments received during the public review period for the proposed amendments which occurred between June 5 to July 22, 2024. The numbering corresponds to the numbers referenced in the summary of submitted comments above. The submittal format is also noted, and generally consists of emails with/without attached

letters. The Planning Division appreciates all those who took time to attend the community workshops and submit comments.

(1) From: South Coast Community Workshop  
Submittal Format: Staff notes from Workshop

(2) From: Central Coast Community Workshop  
Submittal Format: Staff notes from Workshop

(3) From: North Coast Community Workshop  
Submittal Format: Staff notes from Workshop

(4) From: Bob Guthrie, Resident  
Submittal Format: Email

(5) From: Mark Sirota, Resident  
Submittal Format: Email

(6) From: Wendy Sauter, Resident  
Submittal Format: Email

(7) From: Sam Bruttomesso, South Coast Resident  
Submittal Format: Email

(8) From: Wendy Lee, Resident  
Submittal Format: Email

(9) From: Joy Downing Riley, Surfrider Foundation  
Submittal Format: Email with attachments

(10) From: Paul Burke, National Association for the Advancement of Colored People  
Submittal Format: Email with hyperlink and attachment

(11) From: Mark Capron and Mohammed Hasa, Ocean Foresters  
Submittal Format: Email with attachment

(12) From: Rene Aiu, Clean and Safe Neighborhood Watch  
Submittal Format: Email with attachments

(13) From: Jim King, Solimar Beach Resident  
Submittal Format: Email

(14) From: Sandra Hayden McLaughlin, Silver Strand Resident  
Submittal Format: Email

(15) From: Doug and Terri Canaan, Resident  
Submittal Format: Email

(16) From: Robert and Janet Brunner, Mussel Shoals Resident

Submittal Format: Email with attachments

(17) From: Walter Crampton, ENGEO Incorporated  
Submittal Format: Email

(18) From: Mandy Sackett, Surfrider Foundation  
Submittal Format: Mail

(19) From: Bonnie Luke, County of Ventura  
Submittal Format: Email

(20) From: Daniel Glaser, Silver Strand Resident  
Submittal Format: Email with memo attachment

(21) From: Marta Brown, Smart Coast California  
Submittal Format: Email with memo attachment

(22) From: Jasmin Kim, City of Oxnard  
Submittal Format: Email with memo attachment

(23) From: Stephen Harbison, Seacliff Beach Colony Homeowners Association  
Submittal Format: Email

(24) From: Kate Larmendy, Faria Beach Resident  
Submittal Format: Email

(25) From: Jude Miranda, Caltrans District 7  
Submittal Format: Email with memo attachments

(26) From: Charles Caspary, Resident  
Submittal Format: Emails with memo attachment

(27) From: Kendall Lousen, United States Ventura Navy Base  
Submittal Format: Email with memo attachment

(28) From: Colter Chisum, County of Ventura  
Submittal Format: Email

(29) From: Ashley Kennedy, County of Ventura  
Submittal Format: Email with memo attachment

(30) From: Virtual Community Workshop  
Submittal Format: Staff notes from Workshop

# Comment 4

**Engstrom, Aaron**

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**From:** Robert Guthrie <[REDACTED]>  
**Sent:** Wednesday, June 12, 2024 12:59 PM  
**To:** Engstrom, Aaron  
**Subject:** VC Coastal Resilient Plan

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

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Dear Mr. Engstrom:

I've reviewed the presentation on the above subject. Overall the plan appears well thought out. My only concern is the allowing of new or replacement buildings to increase their overall height relative to projected sea level rise. When viewing scenic resources from the ocean to land, views would not be adversely affected as the vantage point will have moved up proportionally. However when viewing scenic resources towards the ocean the vantage point is fixed and raising building heights will adversely impact these resources. I recognize you did some viewshead analysis but it was limited and even that showed some negative impact. With this in mind I do not believe an increase in height should be permitted.

Thank you for your consideration.

Sincerely,  
Bob Guthrie

# Comment 5

**Engstrom, Aaron**

---

**From:** Mark Sirota <[REDACTED]>  
**Sent:** Wednesday, June 12, 2024 1:47 PM  
**To:** Engstrom, Aaron  
**Subject:** Comments on Ventura County's Sea Level Rise Planning

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

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Hi Aaron,

I asked this question at Monday's meeting but I wasn't very clear or I didn't understand the answer. It's complicated, I know. Mostly I'm interested in 1) below.

- 1) Will owners of existing residential properties in areas that require adaptation mechanisms, such as raising structures on stilts or similar for new development be required to retrofit their properties at some point?
- 2) What is the expectation of insurance availability for existing owners that don't retrofit with adaptation mechanisms?
- 3) Who pays for the collateral damage caused by a non-retrofitted building that is severely damaged during a storm or high tide? For example, if a part of a house crumbles and rams into another house, etc?

Thank You,  
Mark Sirota



## Comment 6

**Engstrom, Aaron**

---

**From:** Wendy Sauter <[REDACTED]>  
**Sent:** Thursday, June 13, 2024 6:32 PM  
**To:** Engstrom, Aaron  
**Subject:** Ventura County Coastal Resilient Plan

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Hi Aaron,

Thank you for the presentation on Monday. Obviously there is good scientific data and information that went into your talk. For the most part I agree with the plans that were presented but I do object to an increase in height for replacement buildings or for new buildings. As you are aware one of California's greatest attributes is the ocean and being able to visit or view the coast. I think it's important to minimize the impact of the height of buildings rather than increase them even though this would be a result of sea level rise.

Thank you for your consideration.

Wendy Sauter

# Comment 7

Engstrom, Aaron

---

**From:** [REDACTED]  
**Sent:** Tuesday, June 25, 2024 6:49 PM  
**To:** Engstrom, Aaron  
**Subject:** FROM SAM BRUTTOMESSO-11124 (44000) PCH

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

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To Klylie Speth,

Our home is pictured on your Sea Level Rise Project FAQ Sheet. The address is 44000 Pacific Coast Hwy. (also 11124 PCH) Ventura County, Malibu 90265-2002. The house is on pilings and has always had a sea wall since I bought it in 1976. We have had FEMA flood insurance since 1976 but, unfortunately, I let it lapse a few years ago until my mortgage lender notified me. Then FEMA raised my premium from less than \$500.00/year to \$2,600.00/year because the first floor elevation was changed to 1.5 feet even though it is a minimum of 8.0 feet. I have been paying \$2,600.00/year for several years but wonder if there is any way to correct the elevation error to lower my premiums? I have attached a photo below. Thanks, Sam Bruttomesso, [REDACTED]

■ [REDACTED]



# Comment 8

**Engstrom, Aaron**

---

**From:** Ventura County Planning Division [REDACTED]  
**Sent:** Wednesday, June 26, 2024 2:03 PM  
**To:** Engstrom, Aaron  
**Cc:** RMA ITS  
**Subject:** New submission from VC Resilient Comments

**You have a new comments submission:**

**First Name:** Wendy

**Last Name:** Lee

**Email:** [REDACTED]

**Zip Code:** 93035

**Comments:** My comment is a general one, about the schedule for the meetings that were held earlier this month, as well as any future meetings where the public may attend. In my opinion, the meetings were not marketed or publicized widely and for a long enough period to inform community residents about the meetings. Additionally, having only 1 meeting date and time for each regional area seems too limited. I, for one, wanted to attend the Silver Strand area meeting but was unable to because of a conflict in my schedule. Having additional dates and times to choose from would help resolve that issue; at least, for me. I'm guessing that there might have been others, also, who have an interest in this matter and would have attended the meeting if they'd been informed adequately and had also been available on that one date and time.

Thank you.

## Comment 9

Hi, Aaron,

We really appreciate the amount of work and perseverance the County has put forth to create the SL Rise Plan and Coastal Hazards Amendments statement for the County.

Thanks for asking for our input. My comments are more general than technical:

1. I have found that in trying to help educate our community about SL rise that the language used in the 2019 report and the website are geared perhaps toward a college educated audience and contractors, developers, planners, and government agencies. These professionals are used to working with codes and other planning language. I find that the website language is hard to pass on to a more general audience or even advanced high school students.

My recommendation:

Create a second information sheet that explains the concepts of SL in more basic language along with simpler language about its local impacts - all on one sheet. I would include, again in more simple language, a summary of what the County has done. I would hope to see that general sheet for lay people in Spanish as well.

2. While the focus of the project is planning for development and incremental mitigation, I think a section needs to be added along with the Managed Retreat summary that SL does not just create flooding hazards. SL also creates more cliffside erosion/beach recession due to armoring due to the way wave energy travels. Photos below of train trestle erosion south of Emma Wood State Beach (UP RR came out and added the grey gravel. You can see how far the cliff eroded due to the more northern revetment sending wave energy south to the softer, sandier cliff) at Mondos and Countyline cliff erosion.)

For reference: Waves and Beaches: The Powerful Dynamics of Sea and Coast by William Bascom, Kim McCoy. Page 56 shows a formula for looking at wave dynamics.

3. Based on my observations of the RP eroding coastline at places like Emma Wood at the Rincon Parkway Day Use section at the cove closest to Solimar, along with the recent Mondos rockfall, I think the proposed ministerial permit pathway for limited coastal armor maintenance is imperative for the safety of beachgoers.

4. While the County positively reports that sewer/water/energy facilities are not vulnerable, I recommend some finding from the County that documents what the UP RR response has been to SL and the tracks that are present on the coast. In other words, what is the UP RR planning in regard to the County's statement on vulnerabilities? Aren't the coastal tracks vulnerable?

5. I lost the placeholder for the comment about potential impacts of speedier SL rise due to the Thwaites Glacier melt. I recommend having a separate paragraph in the light of that melt since scientists do not expect the slowing at all of that melt. Its melting impact on rising oceans resulting in greater coastal flooding is not the only impact.

Impacts will be seen on currents and the mix of freshwater and saltwater at the surface level of the ocean where surface temp.s are also rising. The result is dynamic for more moisture laden atmospheric river events which also increase flooding risks.

I think what you said about having to update the plan in light of those facts could be developed in the doc. so that the County would not be caught on the backfoot.

6. As I also mentioned, while this doc. is focused on flooding events and development approaches, SL will also impact our marine life who strand on our coastline when they are sick or ill. You probably have noted the very large pod of male, non breeding California sea lions that have made Kiddie Beach their new home. The relocation of sea mammals due to ocean and habitat changes are also hazardous to both wildlife and humans.

Tanks Beach, as an example, has a staircase to the beach used by sick sea mammals when the beach disappears at high tide. Several animals moved onto Hwy 1 and were hit and killed by cars.

I recommend mentioning in the report that SL also will impact the interaction of marine mammals and humans adversely.

I think some thought could be given to creating sea mammal islands offshore which would attract sea mammals and keep them off the roadways and people's patios and parking areas.

That kind of project would have to be run through USFW and NOAA of course - which is way above my pay grade.

Thanks!

Joy Downing Riley

[REDACTED]

(she/her)

Ventura County Chapter Surfrider Foundation

Lead - Respect the Rincon Parkway

Blue Water Task Force Coordinator









# Comment 10

**Engstrom, Aaron**

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**From:** Paul Burke <[REDACTED]>  
**Sent:** Thursday, July 18, 2024 9:50 AM  
**To:** Engstrom, Aaron; Nielsen, Donald  
**Cc:** Regina K. Crawford; Vincent Stewart; Patricia Ritchie; Wayne Morgan  
**Subject:** Comments on sea level amendments  
**Attachments:** NAACP sealevel comments 2024-07.pdf

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Aaron,

Attached are comments on the county's proposed coastal zoning amendments for sea level rise.

Thank you for meeting with us and resolving many of the informational questions.

Paul Burke, Chair  
Environmental & Climate Justice Committee  
NAACP of Ventura County, CA



## Comments on Ventura County's Sea Level Amendments

7/18/2024, Paul Burke, [REDACTED]  
Chair, Environmental & Climate Justice Committee, NAACP of Ventura County  
<https://naacp-venturaco.com/comments-ecj>

Current Ventura County ordinances are at:

- <https://vcрма.org/en/fast-find/ordinances>
- Floodplain ordinance is omitted there, and is not searchable on Public Works site. Here is a searchable copy <https://www.documentcloud.org/documents/24775187-venturacountyfloodplainmanagementordinance> from non-searchable pdf at <https://vcfloodinfo.org/floodplain-development/>

Amendments proposed are at: <https://vcрма.org/en/vc-resilient-coastal-adaptation-project>

### MOTIVATION

The Floodplain ordinance says wisely that all of us, even away from the coast, are harmed when coastal buildings are not raised high enough:

- "flooding which may result in loss of life and property, health and safety hazards, disruption of commerce and governmental services, extraordinary public expenditures for flood protection and relief, and impairment of the tax base, all of which adversely affect the public health, safety, and general welfare. B. Such flood losses are caused by uses that are inadequately elevated..."
- Besides those issues, wave-damaged homes can leak sewage and gas, and debris can batter inland homes, endangering us all. Taxes, utility rates and insurance rates can all rise, and more insurance companies can leave the state.
- We want to encourage and simplify private spending to prepare for sea level rise, to avoid future public spending and damage to others.

### COMMENTS

We request adding the underlined words and removing the crossed out words. Reasons are below the table.

Pages	HEIGHT OF BUILDINGS
Amend 24-25	<b>Sec. 8178-4 - Mitigation of Potential Hazards...</b> 3. ... sufficient elevation that the lowest horizontal structural member is <u>at least</u> 1 foot above the calculated design flood elevation that is projected for the expected life of the development factoring in the effects of the sea level rise scenarios in Section 4.1.6 , Policy 1.4, Table 1 of the Ventura County Coastal Area Plan, as may be amended, <u>and no more than needed for a 200-year project life and storms with 18% chance in 200 years (1/1000 chance per year).</u> <b>OR</b> 3. ... sufficient elevation that the lowest horizontal structural member is <u>1-12 feet</u> <del>feet</del> above the calculated design flood elevation that is projected for the expected life of the development factoring in the effects of the sea level rise scenarios in Section 4.1.6 , Policy 1.4, Table 1 of the Ventura County Coastal Area Plan, as may be amended

Ventura County Branch Unit#1053  
P.O. Box 5792, Oxnard, CA 93031 PH: 888 831 7432



Plan 32	<b>Table 1 - Expected <u>Minimum</u> Life and Sea Level Rise Scenarios for Coastal Development, Identified by Proposed Use</b>		
	Proposed Use	Expected <u>Minimum</u> Life (Years)	Sea Level Rise Scenario
	Residential/Commercial	75	Intermediate-High
Amend 13-14	<b>Sec. 8175-3.13.2 – Building Height Regulations in the RB and RBH Zones</b> <i>Building height</i> in the RB and RBH zones shall be measured from the higher of the following: (1) the <del>lowest horizontal structural member minimum elevation of the first floor as established by the Public Works Agency based on a Coastal Hazards Analysis Report (see Appendix H1),</del> or (2) 18 inches above the highest point of the street(s) centerline adjacent to the lot.		

**Reasons.** Our wording gives property owners flexibility and encouragement to prepare for foreseeable sea level rise and storms at their own expense. Encouraging owners to prepare will also protect taxpayers from bailing out oceanfront owners in the future.

A limit on property rights and an unsafe incentive are created by the county's proposed wording. It allows a 3-story house (28 feet) if owners prepare for 75 years with 53% chance of wave intrusion (1% per year). However it allows only a 1-2 story house if owners prepare for more realistic risks. The 28-foot height needs to be available starting at whatever reasonable height the property owner chooses. The 75 year life comes from the Coastal Commission (which says 75-100 years<sup>1</sup>). The Coastal Commission says it is not based on evidence.<sup>2</sup>

Research shows homes average 180-260 year lives.<sup>3</sup> Using 200 years instead of 75 years will add about 11 feet to the height, as shown in the table on page 4. Continuing sea level rise is not speculative. It is locked in for hundreds of years, because sea water expands as heat spreads deeper in the ocean, and the Greenland and Antarctic ice sheets will keep melting.<sup>4</sup>

The Coastal Commission itself says that 1% storms have 53% cumulative chance of happening sometime in a 75 year period.<sup>5</sup> Designing for bigger storms, with one in 1,000 chance each year, cuts the cumulative chance during 75 years to 7%, and during 200 years to 18%. The bigger storms will cause bigger surges, and we have not found estimates.<sup>6</sup> Bigger storms will also cause bigger waves, with up to 43 foot crests.<sup>7</sup> However these waves will break offshore, and staff have told

<sup>1</sup> [https://documents.coastal.ca.gov/assets/slr/guidance/2018/0\\_Full\\_2018AdoptedSLRGuidanceUpdate.pdf](https://documents.coastal.ca.gov/assets/slr/guidance/2018/0_Full_2018AdoptedSLRGuidanceUpdate.pdf) says

- P.101 "Some LCPs [local county plans] include a specified design life for new development ...Residential or commercial structures will likely be around for some time, so a time frame of 75 to 100 years **may be appropriate.**"
- P.117 "Bluff-top Residential Development: The lifetime of the project is assumed to be **at least** 75 years, unless the **LCP specifies** a different time period."
- P.226 "Residential or commercial structures, which will be around longer, **should choose** a time frame of 75 to 100 years to consider."
- Draft 3/2018 *residential* guidance, which was never finalized, said 75-100 years, pp.52-53  
<https://coastal.ca.gov/climate/slr/vulnerability-adaptation/residential/>

<sup>2</sup> Email to NAACP 7/1/24 <https://docs.google.com/document/d/135iuDetwZV8ce7RINHXiI6aT1f2drPWnNcCSCM6JtEo/edit>

<sup>3</sup> Summary of research [https://docs.google.com/document/d/1DdC-iqV5Qr5oTLtyhTXjoo4\\_5UwPwDzujTYxD66WLU/edit](https://docs.google.com/document/d/1DdC-iqV5Qr5oTLtyhTXjoo4_5UwPwDzujTYxD66WLU/edit)

<sup>4</sup> IPCC AR6, Climate Change 2021, *The Physical Science Basis*, pages 1306-1307 cover ice sheet melting  
<https://www.ipcc.ch/report/ar6/wg1/>

<sup>5</sup> 53% is on page 243 of [documents.coastal.ca.gov/assets/slr/guidance/2018/0\\_Full\\_2018AdoptedSLRGuidanceUpdate.pdf](https://documents.coastal.ca.gov/assets/slr/guidance/2018/0_Full_2018AdoptedSLRGuidanceUpdate.pdf)

<sup>6</sup> NOAA says surges go up to 30 feet: "winds swirling around the hurricane. This advancing surge combines with the normal tides and can increase the water level by 30 feet or more." <https://oceantoday.noaa.gov/fullmoon-stormsurge/welcome.html>

<sup>7</sup> [https://docs.google.com/spreadsheets/d/11JdD50zIEw\\_qL3GY4EI1iCUba8umIoETLdv6qSWc7pw/edit?gid=2109551221#gid=2109551221](https://docs.google.com/spreadsheets/d/11JdD50zIEw_qL3GY4EI1iCUba8umIoETLdv6qSWc7pw/edit?gid=2109551221#gid=2109551221)

us they expect 5' waves to create the biggest runup onshore, which would be 15 feet vertically.<sup>8</sup> Five-foot waves may become more common, but structures already need to design for them.

Health and safety are the main justifications for zoning rules. Views are not a reason to limit safety. Views from the 101 will be barely affected, since much of the 101 along the ocean has no homes in the way. At Mussel Shoals the view from the 101 is a concrete wall. Views and scale inside neighborhoods will be affected by any elevation, so we do well to allow adequate elevation. Page 17 of the Floodplain ordinance requires open pile or column foundations. If they are high enough, and spaced enough, people have views of the ocean between the columns. We are all safer when owners elevate as much as they can afford to. It is cheaper as well as less dangerous for owners to elevate more in the first place if they wish, rather than to have to elevate now, and then again in future decades.

In the same vein of encouraging elevation, Florida publishes the height of elevation required for each part of the coast, rather than asking each applicant to reinvent the wheel.<sup>9</sup> We encourage the county to get funding for such a study, to avoid the duplication and cost of individual Coastal Hazards Reports. In the meantime, publishing on an online map all the elevations determined as they are approved would show property owners what to expect when they think about renovating and elevating.

Page	Disaster Replacement (gray block is for context, with no change proposed)
Ord 23-24	Height - The vertical distance from the adjacent grade or other datum point <u>or lowest horizontal structural member</u> to the highest point of that which is being measured.
Ord 85	<b>Sec. 8174-6.3.5 - Disaster Replacement of Structures</b> ... replacement of any legally permitted structure, other than a public works facility, destroyed by a disaster is exempt from coastal development permit requirements. The replacement structure shall conform to applicable existing zoning requirements, shall be for the same use as the destroyed structure, shall not exceed either the floor area, height, or bulk of the destroyed structure by more than 10 percent,

**Reason.** The current ordinance's disaster replacement rule requires that owners "conform to applicable existing zoning requirements." This requirement will include the new sea level rules. Yet this disaster rule allows only 10% height increase. Both are possible if the definition of height starts at the lowest horizontal structural member.

Page	Sec. 8175-3.6 - Connection of Structures... (gray block is for context, with no change proposed)
Amend 13	b. ...In Screening Area A, <u>stairs and elevators shall be designed so they do not break away in design floods, and non-habitable accessory structures such as decks, stairs, spas, and sheds, shall be designed so they do not break away in design floods or they break away without causing any damage to the structural integrity of the building on which they are used or any buildings to which they might be carried by flood waters.</u> <del>structurally disconnected from the principal structure and designed to:</del> (i) <del>be removed voluntarily or upon lawful order or directive if imminently threatened or damaged beyond repair by coastal hazards (e.g., erosion, bluff failure, or wave hazards)</del> and (ii) <del>break apart during hazardous conditions if timely removal is not completed...</del>
Flood 3	"Breakaway walls" are any type of walls, whether solid or lattice, and whether constructed of concrete, masonry, wood, metal, plastic or any other suitable building material which are not part of the structural support of the building and which are designed to break away under abnormally high tides or wave action without causing any damage to the structural integrity of the building on which they are used or any buildings to which they might be carried by flood waters. A breakaway wall shall have a safe design loading resistance of not less than 10 and no more than 20 pounds per square foot...

<sup>8</sup> [http://www.opc.ca.gov/webmaster/ftp/project\\_pages/energy/CA\\_WEC\\_Effects.pdf](http://www.opc.ca.gov/webmaster/ftp/project_pages/energy/CA_WEC_Effects.pdf) says, p.69,

- "Wave runup R is the maximum vertical extent of wave uprush on a beach or shoreline above the still-water level"
- "There are a variety of expressions for wave runup, from the simple **R ~ 3H** for surging waves on a planar beach (Hunt 1959) to much more complex expressions."

<sup>9</sup> [https://floridadep.gov/sites/default/files/100YearStormElevationRequirements\\_508.pdf](https://floridadep.gov/sites/default/files/100YearStormElevationRequirements_508.pdf)



**Reason.** Stairs need to be permanent, for emergency access after a flood. If owners install an elevator, there is no way to design it to break away without harm to other buildings, so it must withstand floods, though it may not operate after water intrusion. The County's proposed wording would let the pieces damage neighboring buildings. The floodplain ordinance already applies and has better wording, as shown.

## PROCESS

We call for a "collaborative process" where communities, stakeholders, county staff and Coastal Commission staff come together to explore options, as required by 2024 California state guidance:

Page	BOX 2: Guidance on Planning for Sea Level Rise Using the California Sea Level Scenarios... <sup>10</sup>
OPC 9	<b>&gt;&gt; STEP 5: Explore adaptation options and feasibility</b> A collaborative process including affected communities, stakeholders, and relevant regulatory bodies should explore feasible adaptation options.

**Reasons.** County staff have listened to the community, and, separately, listened to the Coastal Commission staff. That is shuttle diplomacy, not collaboration. The current process is that county staff will take written comments and go back to the Coastal Commission. That is an administrative procedure, not collaboration. Collaboration requires Coastal Commission staff to join community, stakeholders and local staff in a series of conference calls to explore collaboratively. The requirement is to explore. Final decisions rest with the Board of Supervisors.

We are not blind that the Coastal Commission may not want to collaborate with us. They cannot expect us to follow state guidance until they follow this state guidance.

**Sea Level Rise Estimates, in Feet** (Highlighted cells compare conservative estimates for 75 and 200 years. Other cells show higher numbers are justified too.)

Years from Now	Date	Santa Barbara or Santa Monica Gauge <sup>11</sup>		IPCC AR6 83rd percentile, 5°C, interpolated between 2100 & 2300 <sup>12</sup>	
		Int-High	High	Without marine ice cliff instability	With marine ice cliff instability
75	2100	4.5 or 4.6	6.3 or 6.4	3.4	3.4
125	2150	7.6 or 7.9	11.3 or 11.5	8.2	15.7
150	2175			10.5	21.8
175	2200			12.9	28.0
200	2225			15.2	34.1
275	2300			22.3	53.1

<sup>10</sup> 2024 OPC guidance, page 9,

<http://opc.ca.gov/wp-content/uploads/2024/05/Item-4-Exhibit-A-Final-Draft-Sea-Level-Rise-Guidance-Update-2024-508>.

<sup>11</sup> 2024 OPC guidance, page 90,

<http://opc.ca.gov/wp-content/uploads/2024/05/Item-4-Exhibit-A-Final-Draft-Sea-Level-Rise-Guidance-Update-2024-508.pdf> Another source is <https://sealevel.nasa.gov/task-force-scenario-tool>

<sup>12</sup> IPCC AR6, Climate Change 2021, *The Physical Science Basis*, pages 1305-1306 <https://www.ipcc.ch/report/ar6/wg1/> gives a range of estimates for each scenario, from the 17th to the 83rd percentile. The only estimates they give for 2300 are for 1.5°C, which we have already reached, and 5°C, where they say,

- "between 1.7 and 6.8 m by 2300 in the absence of MICI" and
- "Incorporating Antarctic results from a model with MICI..., leads to... 9.5–16.2 m" and "up to 16 m considering MICI" (marine ice cliff instability)

Interpolations and conversions from meters are at

[https://docs.google.com/spreadsheets/d/11JdD50zIEw\\_qL3GY4EI1iCUba8umIoETLdy6gSWc7pw/edit?gid=0#gid=0](https://docs.google.com/spreadsheets/d/11JdD50zIEw_qL3GY4EI1iCUba8umIoETLdy6gSWc7pw/edit?gid=0#gid=0)

#### Chance of Damage over Long Periods

Storm with this chance of being equaled or exceeded each year:	Cumulative risk that at least one storm that bad happens during this many years: <sup>13</sup>		
	75	100	200
1%	53% <sup>14</sup>	63%	87%
0.5%	31%	39%	63%
0.2%	14%	18%	33%
0.1%	7%	10%	18%

<sup>13</sup> Table uses standard probability calculations

[https://docs.google.com/spreadsheets/d/11JdD50zIEw\\_qL3GY4EI1iCUbq8umIoETLdy6gSWc7pw/edit?gid=2109551221#gid=2109551221](https://docs.google.com/spreadsheets/d/11JdD50zIEw_qL3GY4EI1iCUbq8umIoETLdy6gSWc7pw/edit?gid=2109551221#gid=2109551221)

<sup>14</sup> 53% is also shown by the Coastal Commission on page 243 of

[documents.coastal.ca.gov/assets/slr/guidance/2018/0\\_Full\\_2018AdoptedSLRGuidanceUpdate.pdf](https://documents.coastal.ca.gov/assets/slr/guidance/2018/0_Full_2018AdoptedSLRGuidanceUpdate.pdf)



# Comment 11

Engstrom, Aaron

---

**From:** [REDACTED] <[REDACTED]>  
**Sent:** Thursday, July 18, 2024 2:02 PM  
**To:** Engstrom, Aaron  
**Cc:** m.hasan@oceanforesters.com  
**Subject:** Adding innovation to sea level rise and coastal hazard reductions into Ventura County planning  
**Attachments:** Ventura County sea level brainstorm icebreakers 18Jul24.docx  
**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

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Aaron,

**Policy suggestion:** Add a policy to seek innovations. A search of the Plan for “innovation” had zero matches.

The federal government is encouraging innovation. That implies there will be federal funding for innovations. See “Encouraging innovation” in attached, “Ventura County sea level brainstorm icebreakers 18Jul24”.

**Possible Projects Appendix suggestions:**

Make (or find) a summary of sea level adaptation projects that have been built or discussed with pros and cons. Should be less than a page. Include links to examples.

After the one-page existing projects, place as-yet-untried innovations, might be a page or two per innovation. Most of the concepts in “Ventura County ... icebreakers...” would be in the innovations section. Bob Kiel’s sandy seafloor kelp restoration project might be listed in existing projects, if BEACON creates a webpage for it.

Both an innovation policy and a possible projects appendix help the community refine their goals and objectives. For example, consider Policy “2.15 The County should work with ... BEACON), The Port of Hueneme, ... to identify and issues and establish common goals and objectives regarding sediment management, as well as identify resources to meet defined goals.” If people have never thought of an EcoDistrict they won’t know to make establishing one their goal. If people don’t know they want research to refine the design of portable living reef foundations with adjustable sand transport, converting wall breaks to left and right breaks, protecting piers, and increasing marine biodiversity, they won’t know to make that research their objective.

This replaces our June 6 “Multi-benefit ...” suggestion.

Thank you  
Mark and Mohammed

Mark E. Capron, PE Mohammed A. Hasan, PE



OceanForesters  
Ventura, California  
Cell: [REDACTED]

Feed the world. Restore the oceans. Cure climate change.

## Sea level rise adaptation icebreakers for Ventura County brainstorming

### Inspiring holistic thinking globally

Communities must adapt to sea level rise for a few centuries, but often operate in crisis mode. Crisis mode drives people to focus on the quickest, band-aid fix such as a seawall or rip-rap.

Ventura County may have more impact by encouraging local governments to search for environmentally *and economically* self-sustaining adaptation projects with holistic benefits. For example, Oceanside's RE:BEACH living reef foundation is a multi-benefit adaptation to handle sea level rise and storm hazards. That means Oceanside could, eventually, expand their project into a local or regional self-supporting operation. Governance structures can include: an enterprise operation within existing city government; a special district<sup>1</sup>; a group of fishers, aquafarmers<sup>2</sup>, other stakeholders such as Ventura County and surfers<sup>3</sup>; or private businesses that contract with local government.

A better term for holistic minded coastal governance might be "Coastal Ecosystem District" (EcoDistrict). The EcoDistricts would manage activities in an area<sup>4</sup> they select. An EcoDistrict might train and employ the people who design, build, operate, and fish in their area. An EcoDistrict might contract with others (including other EcoDistricts) to train people, design, build, operate, and fish in their area. EcoDistricts can gain substantial income from recreation (which requires clean healthy water), sustainable mariculture, perhaps renewable energy production, and other complementary resources to fund healthy oceans, managed resilience and/or retreat, human structure adaptations, insurance, and shore protection.

### Encouraging innovation

The world's oceans and coastal communities face great challenges, but current tools are inadequate. Earth's people need innovations. Even the U.S. Army Corps of Engineers has signed onto the U.S. Government Accounting Office's recommended "[Options to Enhance the Resilience of Federally Funded Flood Risk Management Infrastructure](#)". Given the Army Corps' new interest in innovation, Ventura County might ask the Corps to push holistic innovations to replace undesirable Hurricane Reimbursement Grant projects.

[Research](#) keeps telling people we need to: (1) design adaptations to sea level rise that might be adaptations to triple-threat events; and (2) spend more resources on trying out and improving potential innovations than on "how bad and when" research.

### Examples of potentially desirable innovations

- 1) Southern California [sandy seafloor kelp restoration](#) leveraging tubeworms
- 2) [Beach sea gardens and Tidal fishing weirs](#)
- 3) COILReef: a [portable living reef](#)

<sup>1</sup> A Port, Harbor, Bridge, or Geologic Hazard Abatement District (GHAD). For example, the [Broad Beach GHAD](#) is a collection of homeowners that formed to fund beach nourishment. California GHAD projects can be expedited without some environmental documentation.

<sup>2</sup> Such as a fishers co-operative working with [Territorial Use Rights Fishery](#) (TURF).

<sup>3</sup> Consider imitating a TURF, but for surfing, kite surfing, paddleboard, SCUBA diving, etc.

<sup>4</sup> Could extend from offshore to as far inland to the land that may be flooded during 100-year storms within 50 years. Update that inland boundary every five to ten years.

### Southern California kelp forest restoration

Kelp forests promote ocean health with much more than habitat. Kelp put 50 to 60% of the carbon (polyphenols) they photosynthesize into the water. Polyphenols are healthy food for microorganisms. This food moves up the food chain, creating biodiversity and seafood.

Kelp plants have evolved to not appreciably attenuate waves. Kelp and tubeworms have evolved a synergistic relationship with tubeworms settling close to kelp for the food and kelp holdfasts attaching to tubeworm homes. Many tubeworms, who build homes by cementing sand, could stabilize a sandy seafloor, unless the kelp pulls the tubeworm onto the beach during large waves.

Bob Kiel, conducting kelp restoration trials for [BEACON](#), found that juvenile kelp would quickly attach to granite stakes. Tubeworms would build homes near the new kelp. Juvenile kelp would then attach to the tubeworm homes. Eventually, a sprinkling of granite stakes would result in kelp holdfasts on tubeworm homes filling in the seafloor between the granite stakes.

Bob noticed that green crabs would eat the kelp before it could grow up to the ocean surface. So, he invented the octo-column, Figure 1. The octo-column is the ideal home of California two spot octopus, which will eat crabs venturing into its territory before crabs can eat too much kelp.



Figure 1 – Photos of octo-column construction details and kelp growing on an octo-column

This tale of synergy and special habitats is not limited to kelp-tubeworms-crabs-octopus or Southern California. Similar relationships and opportunities for innovation are available in every coastal ecosystem.

Simply embedding octo-columns in sandy seafloor does not guarantee full kelp forest restoration. Kelp forests decline in warmer water, which accompanies El Niño and may be more frequent with climate change. Also, more intense storms will wash more kelp-on-tubeworms ashore. This means a more robust sandy seafloor kelp forest restoration may require a [portable living reef](#) and/or [low voltage electricity](#).

### Beach sea gardens and Tidal fishing weirs

Beach sea gardens and tidal fishing weirs can be important to EcoDistricts as:

1. Extremely accurate, citizen-scientist operated, daily survey tools for the number, size, health, and reproductive situation, of every species near the ecosystem. In addition to the permanent resident intertidal creatures, deep-water fish are trapped every low tide and released every high tide.
2. Restores of intertidal biodiversity (clams, sand dollars, grunion, crabs, ...)
3. Shore protection.
4. Sustainable and restorative fisheries, particularly women-owned fisheries in developing countries.

Pacific Ocean peoples traditionally made coastal ocean tidal fishing weirs with carefully piled rock, requiring substantial hand labor initially and after each large storm. Native Americans sometimes use wood fence weirs in rivers. Today, cost-effective ocean tidal fishing weirs can be built of concrete, [OysterCatcher](#) material, or bare steel. Bare steel requires impressed current cathodic protection (ICCP) that becomes coated with calcium carbonate (the main ingredient of seashells). ICCP involves inexpensive 6 to 12-volt low voltage DC. The metal is safe for people to touch—even with their feet and the metal in seawater. This is because people's bodies are much less salty, and therefore less electrically conductive, than is seawater. The electricity will flow around people's bodies through the seawater, not through their bodies.

For additional safety and cost savings, the electricity can be limited to when the metal is completely submerged. This is because low voltage electricity precipitates an electrically insulating layer of calcium carbonate (main ingredient of shellfish) while raising ocean pH (countering ocean acidification). The insulating layer protects the steel from corrosion when it is out of the water (during low tide). The thickening insulation also reduces the required amount of electricity over time.

Finally, low voltage electricity can be a triple-benefit to counter the [triple-threat](#). [Biorock™](#) installations provide ample evidence that low voltage electricity improves coral tolerance and recovery from heat waves. There is some evidence for substantially faster shellfish growth and tolerance of low oxygen with marine electrobiology. The converse of life benefiting from electricity, [seaweed generating electricity](#), is well proven.

An electrically [protected portable living](#) reef also offers the triple-benefit to counter the triple-threat.



## COILReef: A Portable, Inexpensive Living Reef

The ideal "protection-emphasizing" living reef foundation biomimics endangered elkhorn coral's biologic and wave-weakening benefits. The 3-D structure would be optimized for exactly the desired amount and shape of wave energy attenuation to protect sandy beaches and floating or elevated homes. The example of [COILReef](#) in Figures 1-3 and Table 1 compares a rock reef and COILReef. Both are built for 30% wave energy attenuation with the expectation of 30% less sand transport along the beach with the top of the structure 20 feet deep on a 40-ft deep sea floor.

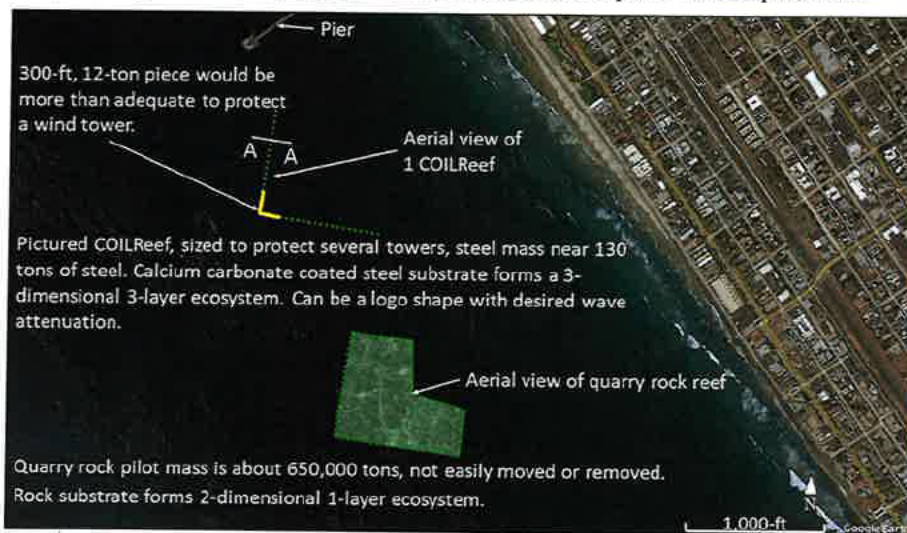


Figure 1 – Aerial view comparing quarry rock and COILReef living reef foundations

[COILReef](#) is a spiral of roll-formed steel. Not only will the same sea life expected on rocks attach to the steel with impressed current cathodic protection (ICCP), but the electricity can be increased to provide the triple-benefit discussed in [Beach sea gardens](#). The coils provide 3 layers of 3-dimensional ecosystem substrate, biomimicking branching coral, providing much better habitat than rocks, as well as effective wave attenuation. Surf "wall" breaks become left and right breaks.

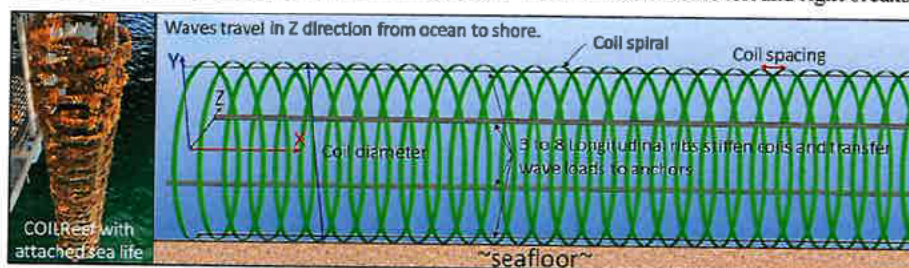


Figure 2 – Left picture shows sea life growing on a COILReef. The right picture shows how the coil is stiffened with longitudinal ribs spot-welded at each coil-rib intersection.

Commented [jj1]: Delete mention of wind towers, Surfrider is not interested in these at this time

Discuss how the COILReef protects the beach while shaping great surfing breaks!

Add to Quarry rock reef:  
"or removed, or adjusted to maximize surfing breaks, while protecting the beach."

Total all-inclusive cost estimates in Table 1 include reef construction plus a few \$million for engineering, permitting, a small pilot, and 30 years of ICCP electricity. That is, the full-size COILReef cost already includes its pilot cost and the COILReef pilot won't need ICCP for years.

The primary benefits of COILReef are its mobility, which should ease permitting, and relatively low cost. Mobility means COILReef can be moved after installation as indicated in Figure 3 – if ocean situations or community needs change. Plus, although the seafloor impacted area is small, its 3-D design provides excellent habitat for many creatures.

COILReef's main disadvantage is the lack of previous installations. It needs calibration of its calculated wave attenuation, structural properties, and anchor system capacity. However, the data from load cells, shown in Figure 3, and strain gauges, can be correlated with incoming wave data to make the needed calibrations on the pilot in a few months. This is because the force transmitted to the anchors is directly related to the energy that is extracted from passing waves.

Likewise, the instrumented full-scale system can provide real-time data on exactly how much wave energy is being attenuated. This means beach management insights months before changes appear in the width of local beaches.

Table 1 – Relative comparison of Figure 1 living reef starter systems

Parameter	units	quarry rock	COILReef	COILReef pilot
Wave energy attenuation	%	30%	30%	30%
Length of leading edge or coils	ft	1,670	1,670	300
Plan view area	sqft	560,000	16,700	3,000
Seafloor impacted area	sqft	560,000	2,500	450
Ecosystem substrate surface area	sqft	840,000	120,000	21,000
Mass, indicates reuse potential	tons	650,000	80	10
Cathodic protection electricity at 12 volts DC (solar or off-peak)	kWh /day	Not applicable	1,000	None for 2 yrs
Total all-inclusive costs for reef	\$ million	\$35	\$10	\$2
Primary benefits		Extensive experience	Uniquely cost-effective in deep water	
Primary issue		Permitting	Untried	
How to address issue		Difficult	Load cells pilot & full scale	

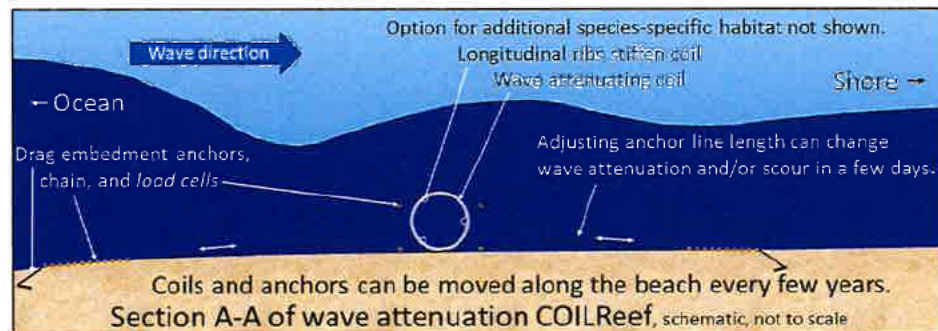


Figure 3 – Section-elevation of portable COILReef

Mark Capron, PE, [markcapron@oceanforesters.org](mailto:markcapron@oceanforesters.org)

Roger Benham, PE, [roger@coilreef.com](mailto:roger@coilreef.com)

5

# Comment 12

**Engstrom, Aaron**

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**From:** Rene Aiu [REDACTED]  
**Sent:** Thursday, July 18, 2024 10:59 AM  
**To:** Engstrom, Aaron  
**Cc:** Lopez, Vianey; O'Riley, Robert; Garcia, Angel; Sandra McLaughlin  
**Subject:** Response to County's Draft LCP Update and the Coastal Resilience Project  
**Attachments:** 2014jpeg.jpeg; Jan 15, 2019 (1).jpeg; Dec 30, 2021.jpg; Mar 28, 2022.jpg; Dec 21 2023).jpeg; 21 dec 2023.jpg; Feb 2024jpg.jpg

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## *The Clean and Safe Neighborhood Watch*

Mr. Aaron Engstrom  
Policy and Programs Manager  
County of Ventura Resource Management Agency  
Planning Division

Date: July 18, 2024

Re: Response to County's Draft Coastal Area Plan (LCP Update) and Its Coastal Resilience Project

Mr. Engstrom:

Having attended your presentation for the Hollywood Beach and Silver Strand areas and having reviewed the draft sections of the Coastal Area Plan and the sixteen pages of the Coastal Resilience Project document that relates to these areas, I have the following comments on behalf of the concerned homes in these areas.

The plans consistently call for mitigating against the impact of sea level rise and coastal hazards (e. g flooding and storm surge). It notes that "At Hollywood Beach, sea level rise models show extensive tidal flooding at the end of the peninsula, Ocean Drive, Sunset Lane, connector streets, the elementary school, and some residential development located along those roads."

Your presentation also points out that these areas have historically and consistently been subjected to the coastal hazard of flooding. The presentation also indicated that the areas of Hollywood Beach and Silver Strand are in the FEMA Zone VE with projected high elevations of flooding (NAVD 1988 and LIDAR). Serious flooding is also projected by NOAA/OPC.

The plan also acknowledges that even now these areas do not have storm pumps to assist with drainage. The plan also notes the inadequacy of the few stormwater pumps at Silver Strand.

The plans appear to simply dismiss this problem and omit possible mitigations that should be taken. The plan also does not provide any data that this situation will not get worse. As you can see from the attached photos

(2014-2024), over the years the flooding has gotten worse. In 2024, several homes on Ocean Drive suffered water damage, some very costly when water got into the houses.

French drains were invented in 1859. This type of drainage is what the County has relied upon over decades in these high property tax paying County coastal areas. These French drains were installed when there were considerably less people, less homes and much smaller beach houses. Maintenance of these drains has simply been limited to annual cleaning the drain holes out of sand, dirt, and plant growth.

French drains are estimated to have a life of 30-40 years. The French Drains on Ocean Drive and in other Hollywood Beach and Silver Strand areas are over 40 years old and need to be replaced by a more effective drainage system in anticipation of the projected flooding, sea level rise, and climate change impact. This should be noted in the plan with a timeline of mitigation plans.

The Ventura County Resilient Coastal Adaptation Project and updated Local Coastal Plan should include flooding hazard mitigation, especially since this has been noted as a consistent occurrence which the County's photos and those that are attached show.

We are asking that the County plans and updates do not overlook but include mitigation plans for flooding hazards that are continually and consistently experienced in these areas due to inadequate drainage systems, like the undermaintained French drains. Thank you.

Rene Aiu on behalf of the Clean and Safe Neighborhood Watch

cc: Supervisor Vianey Lopez, Robert O'Reilly

See attached photos.



ate: July 18, 2024

3: Response to County's Draft Coastal Area Plan (LCP Update) and Its Coastal Resilience Project

r. Engstrom:

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the plans appear to simply dismiss this problem and omit possible mitigations that should be taken. The plan also does not provide any data that this situation will not get worse. As you can see from the attached photos (2014-2024), over the years the flooding has gotten worse. In 2024, several homes on Ocean Drive suffered water damage, some very costly when water got into the houses.

French drains were invented in 1859. This type of drainage is what the County has relied upon over decades in these high property tax paying County coastal areas. These French drains were installed when there were considerably less people, less homes and much smaller beach houses. Maintenance of these drains has simply been limited to annual cleaning the drain holes out of sand, dirt, and plant growth.

French drains are estimated to have a life of 30-40 years. The French Drains on Ocean Drive and in other Hollywood Beach and Silver Strand areas are over 40 years old and need to be replaced by a more effective drainage system in anticipation of the projected flooding, sea level rise, and climate change impact. This should be noted in the plan with a timeline of mitigation plans.

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We are asking that the County plans and updates do not overlook but include mitigation plans for flooding hazards that are continually and consistently experienced in these areas due to inadequate drainage systems, like the undermaintained French drains. Thank you.

Aimee Aiu on behalf of the Clean and Safe Neighborhood Watch

cc: Supervisor Vianey Lopez, Robert O'Reilly

See attached photos.









# Comment 13

**Engstrom, Aaron**

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**From:** Jim King [REDACTED]  
**Sent:** Thursday, July 18, 2024 9:54 AM  
**To:** Engstrom, Aaron  
**Cc:** jking; Charlie Caspary; dennis.solimar; wjk2828  
**Subject:** Draft Local Coastal Program Amendments

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Dear Aaron,

The draft has a more reasonable zoning clearance process for repair and maintenance of seawalls than the current ordinance. Unfortunately, the provision still prohibits mechanized equipment on the beach unless the applicant goes through the conditional permit process. As you are aware, a conditional use permit requires going through the Coastal Commission which is an onerous and expensive process to repair a sea wall.

The sand level can vary a few feet in height over a few days. Having a skip loader on the beach to replace rocks in a damaged seawall causes less damage than kids building sand castles or visitors digging fire pits. Caltrans goes up and down the beach with earth movers and heavy equipment as it needs. Not allowing beach access and the narrow lots with 3' side yards requires most beachfront homeowners to use prohibitively expensive cranes to install rocks. Why do this to our residents and taxpayers.

There has to be some common sense applied to seawall repairs in the final Coastal Program. Please discuss this at your hearings.

Thank you, Jim

\_\_\_\_\_  
Jim King

[REDACTED]  
[REDACTED]  
[REDACTED]

# Comment 14

**Engstrom, Aaron**

---

**From:** Sandra McLaughlin <[REDACTED]>  
**Sent:** Monday, July 8, 2024 3:40 PM  
**To:** Engstrom, Aaron  
**Cc:** Sandra McLaughlin  
**Subject:** Re: VC2040 General Plan Draft EIR for Public Review

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

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Thanks Aaron for getting back to me. I appreciate facilitating the input. It was too late to incorporate the additional input when previously submitted. I believe it had already gone to print at that time in 2017. If needed I can provide individuals at the Coastal Commission and State Lands Commission that I interfaced with for the clarifications I submitted in the current and 2017 email.

I did hear a concern expressed at the meeting regarding evacuation from SilverStrand. I was a member of CERT and specifically worked on the evacuation plan for SS with the County and the Navy. The original individuals I interfaced with were Kevin McGowen, VC and Brian Edsinger, Navy. Kevin is no longer with VC. Currently, Bill Boyd is my VC representative and Navy is still Brian. Evacuation Route out of SS is facilitated by Navy personnel across the Navy Base through the two gates available when exiting SS. Exit from base is Ventura road. The exit plan specifically is designed to avoid inundated land. It's possible with the current information projected regarding sea level rise the maps may not be accurate. If the map could be reviewed to validate it is currently accurate I would greatly appreciate the feedback.

Always good to hear from you and attend your community meetings.

Regards,  
Sandra Hayden McLaughlin

[REDACTED]  
Oxnard, CA 93036

[REDACTED]  
[REDACTED]

Sent from my iPad

On Jul 8, 2024, at 12:54 PM, Engstrom, Aaron <Aaron.Engstrom@ventura.org> wrote:

Hi Sandra,

Thank you for reaching out and attending the Sea Level Rise meetings. There are a few changes proposed for the Coastal Trail policies that are related to Coastal Hazards and sea level rise. This week, I'll take a look at the list of suggestions you provided below and then check-back in with you.

Regards,  
Aaron

---

**From:** Sandra McLaughlin [REDACTED]  
**Sent:** Tuesday, July 2, 2024 2:43 PM  
**To:** Engstrom, Aaron <Aaron.Engstrom@ventura.org>; Engstrom, Aaron  
<Aaron.Engstrom@ventura.org>  
**Cc:** Sandra McLaughlin [REDACTED]  
**Subject:** Fwd: VC2040 General Plan Draft EIR for Public Review

WARNING: If you believe this message may be malicious use the Phish Alert Button to report it or forward the message to [Email.Security@ventura.org](mailto:Email.Security@ventura.org).

Hi Aaron,

I recently attended the meeting at Hollywood Beach Elementary School in June referencing Sea Level Rise and Local Coastal Plan Amendments. I wanted to send you a previous email referencing concerns with the last Coastal Plan Amendment section 4.1 specifically the sections addressing the California Coastal Trail VC section. At the time you indicated that the items would be addressed and included in the next Local Plan Review. Please review my input referencing the Local Coastal Trail clarifications and additions as previously discussed. I noticed at the meeting that no revisions were recommended for this section 4.1 Coastal Trail. Thank you for your efforts and following up on this.

Regards,

[REDACTED]  
[REDACTED]  
Oxnard, Ca 93035  
[REDACTED]  
[REDACTED]

Sent from my iPad

Begin forwarded message:

**From:** Sandra McLaughlin [REDACTED]  
**Date:** March 10, 2020 at 5:39:38 PM PDT  
**To:** GeneralPlanUpdate@ventura.org  
**Cc:** Sandra McLaughlin <[REDACTED]>  
[REDACTED] <aaron.engstrom@ventura.org>,  
[REDACTED]  
**Subject:** VC2040 General Plan Draft EIR for Public Review

Susan Curtis, Manager, General Plan Update Section

Dear Susan,

I am writing in regard to the current draft revision underway for the VC2040 General Plan.

Specifically, I am referencing the "Coastal Area Plan" Chapter 4.1, The Coastal Zone, Section 4.1.4, Coastal Trail of the 2040 Plan that was certified on 7-1-17.

After certification in 7-17 some areas were noted in need of expanded

clarification. Aaron Engstrom was the VC planner we interfaced with during this project. The consensus was that additional clarification could be addressed in future updates/revisions. I do hope this can be addressed in the current update process.

See Pg. 4-7. Coastal Trail Maps - Description of central portion of Ventura County's Coastline unincorporated areas should also reference Silver Strand Beach, Hollywood Beach and La Jenelle Park.

See Pg. 4-8. Single-Mode Routes possibly edit to include Silver Strand Beach, Hollywood Beach and La Jenelle Park as e.g.

See Pg. 4-10. Description of Segment C-1 should include Hollywood Beach, Silver Strand Beach and La Jenelle Park as e.g.. in addition to McGrath State Beach.

See Map figure 4.1-1 California Coastal Trail, Overview County of Ventura; Segment C1. See Figure 4.1-5

The Map overview does not indicate Coastal Trail Route established 7-1-17 encompassing Hollywood Beach, Silver Strand Beach and La Jenelle Park located in Channel Island Harbor. The map was not updated to reflect the additions as of 7-1-17. The current overview map bypasses these areas. Our request is to update this Map to accurately reflect the current California Coastal Trail inclusive of the areas in CI Harbor.

See Tabular Summary for Central Coast Subarea Trail Figure 4.1-4. Hollywood Beach indicated with McGrath State Beach Park Segment C1-C (column indicating Name and Location of Trail Segment.)

See Map Figure 4.1-5 Segment C1 of the Coastal Trail (cont.) End of Segment C1 should indicate inclusiveness of La Jenelle Park as section of Coastal Trail Segment C1. It appears to stop at end of Ocean Drive on the map short of La Jenelle Park and LJ Parking Lot.

See Tabular Summary for Central Coast Subarea Trail Figure 4.1-5, Segment C1-E. Expand narrative to include.

La Jenelle Park added in Name and Location Column.

La Jenelle Park Parking Lot added in Existing Conditions Column.

La Jenelle Park added to reworded Notes Column.

Thank you for all you do and your support in updating this document. Please contact us for clarification, supporting documents and/or review of the above email.

Regards.

Sandra Hayden McLaughlin

[REDACTED]  
Oxnard, CA 93035



( [REDACTED]  
[REDACTED] [REDACTED] [REDACTED]

# Comment 15

**Engstrom, Aaron**

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**From:** Ventura County Planning Division <vcrma@ventura.org>  
**Sent:** Monday, July 8, 2024 2:42 PM  
**To:** Engstrom, Aaron  
**Cc:** RMA ITS  
**Subject:** New submission from VC Resilient Comments

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

**You have a new comments submission:**

**First Name:** Doug and Terri

**Last Name:** Canaan

**Email:** [REDACTED]

**Zip Code:** 93035

**Comments:** Why did they change the original name of Hobie Beach? Why is it referred to as kiddie beach?? It needs to go back to it's original name Hobie Beach and stay that way. We have lived in Silverstrand for the past 24 yrs. one possible idea could be staggered seawalls on the beach w/ the possibility of a walking path to the water as in Santa Monica. We remember when the lifeguard tower washed away. It would be a great asset if they would repair the walk way to the jetty/beach and fix the lighting so people could be safe to walk and park. Also, a higher seawall at Hobie Beach and Victoria right near the Coast Guard. This will protect our homes from the rise of the ocean water, keep the people safe, and especially keep all the seals safe from people intruding on them when they are at rest or when the seals are breeding. Ever since they added more boulders we have seen more sea life which has been great to see. I hope some of these ideas will be useful. Thank you

# Comment 16

**Engstrom, Aaron**

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**From:** The Brunners <[REDACTED]>  
**Sent:** Friday, July 19, 2024 2:58 PM  
**To:** Engstrom, Aaron  
**Subject:** Rincon Island Pier Mussel Shoals comments 2024/Rising Sea Level  
**Attachments:** Pier Decommission 7-2024.doc; Rising Sea Level comments 7-2024.docx

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Please see the attached

Thank you

Robert/Janet Brunner

## Rising Sea Level comments 7-2024

Robert and Janet Brunner have resided in Mussel Shoals for 50 years. Our residence, located at [REDACTED] [REDACTED], is located south east of the pier and beach front. We are very concerned at the removal of the pier and causeway will increase the wave action towards our rock riprap seawall and dwelling causing damage to both. Have any Army Corps Engineer reports regarding this been discussed? We are concerned about sand flow and restoring our rock riprap seawall.

Little Rincon is a well-known advanced surf destination. The wave is a world-class point break enjoyed by many. Also, our tide pools are designated Coastal Commission tide pools that need to be protected and policed due to poachers. Please respect our residential beach community during the decommissioning process.

Lastly, we know of several old oil wells along the beach between the pier and below the Cliff House, we want to make sure these are capped and are in no danger of leaking oil. This should be part of the State Lands responsibility along with the decommissioning of the island.

Thank you

Robert Brunner

[REDACTED] [REDACTED]

Ventura, CA 93101

July 19, 2024

Decommission of the Pier  
Page 2 of 2

I, Robert Brunner resident of Mussel Shoals for 52 years am reaching out to you regarding four issues that negatively affect our community.

1. Mussel Shoals, Ventura California has designated Coastal Commission tide pools. On January 1, 2012 nearly 200 square miles of State waters off the coast of southern pacific became protected by the historic Marine Life Protection Act. Mussel Shoals was not included. We have many daily visitors that come to the beach south of the Rincon Island pier to the Cliff House Inn and remove and disrupt sea creatures and our beautiful rocks. How can we protect our coastline? Can we be included in the Marine Life Protection Act? Can we get signage to inform the public not to remove creatures, etc. and disturb the underwater ecosystem as well as our pebbles and rocks along our beaches? As a local surfer I have noticed signs along Ventura's point state "No rock removal". We need tide pool etiquette signage near the existing pier.
2. In our community we do not have any restroom facilities for beach goers, kayakers, surfers or the many fishermen who visit our community. We have a world class surf break called "Little Rincon". Numerous people who pull off highway 101 or happen to spend the day here have no place to do their "business". The public uses our front yards to urinate and defecate, often in full view of the residents. Our community is worn out from public exposure and clean up we must endure. How can we initiate getting 1 or 2 restrooms to help keep our ocean, beaches and property clean? The area of concern is between the Rincon Island pier and the Cliff House Inn located in the beach community of Mussel Shoals, Ventura, CA 93001.
3. At the south end of Ocean Ave. that crosses Breakers Way is not an intelligent turn around for automobiles and many cars stop and block the road. Our community does not have any turn arounds that work.
4. Leave the existing pier and causeway. Place rock rip rap towards the south east to protect our homes and seawalls. Look into rising sea level solutions to protect our community.

The community of Mussel Shoals looks forward to your reply.

Robert Brunner

████████████████████

Ventura, CA 93001

████████████████

# Comment 17

**Engstrom, Aaron**

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**From:** Walt Crampton [REDACTED]  
**Sent:** Friday, July 19, 2024 5:53 PM  
**To:** Engstrom, Aaron  
**Subject:** RE: Public Review Draft Sea Level Rise Policies: Ventura County

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

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Hi Aaron,

I have reviewed the "June 2024, Public Review Draft: Coastal Zoning Ordinance Draft Amendments for Sea Level Rise and Coastal Hazards" and have the following comments for your consideration.

Although you suggested that I focus my review on the Coastal Hazards Analysis Report Requirements on Pages 38-53, I did read the entire document and noticed under Section 8174-6.3.2 – Repair or Maintenance Activities, virtually any activities on the coast shall require a Coastal Development Permit, although no criticism since most other coastal cities have the same requirements. Regarding Table 1 of the LCP Coastal Area Plan, Public Review Draft, I would ask why you require the Intermediate-High Scenario when OPC 2024 notes that, "The Intermediate Scenario provides a reasonable upper bound for the most likely range of sea level rise by 2100." At a warming level of 3°C in 2100, the probability of exceeding this scenario is 5 percent. OPC 2024 goes on the state, "Based on sea level observations and current estimates of future warming, a reasonable estimate of the upper bound of most likely sea level rise in 2100." The County might consider allowing the Intermediate Scenario in certain instances.

Based on our review of the LCP Coastal Area Plan, Public Review Draft to Policy 1.8, we would advise the County not to require strict compliance with the Federal Emergency Management Agency's Flood Insurance Rate Maps, as FEMA's policies in their Coastal Construction Manual – FEMA-55 were really designed for east and gulf coast states to mitigate against hurricane storm surge, which specifically requires structures be built above the BFE, allowing storm surge to pass under a structure and prohibiting both seawalls and fills that would otherwise prevent the passage of storm surge. The County might consider not requiring all applicants to build up to the FEMA requirements, recognizing that in not doing so, they would not be eligible for FEMA's Flood Rate Insurance.

In Appendix H1, specifically H.1 - Introduction, we assume that Maps 1, 2, and 3 are actually Figures 1-4 located at the end of that appendix; so the text in the parentheses should read "are shown in Figures 1-4 located at the end of this appendix."

Under Section H.2 – Geologic Hazards Analysis Report, specifically subsection b.10, we question the need for the additional 10-foot minimum buffer, recognizing that at the end of the useful life of a structure, the slope having a factor of safety of 1.5 virtually always provides more than 10 feet of additional setback beyond what might exist at the end of the useful life of a structure when the factor of safety of the slope, having experienced erosion, might have lowered to say 1.2 or 1.3.

Under Section H.3 – Coastal Hazards Analysis Report Requirements for Beach Front Development in Screening Area A, we would recommend deleting subsection e.3 ("Recommendations regarding additional bluff setback (minimum – 10 feet) to account for analysis uncertainties). The mere use of a factor of safety of



1.5 assures over 10 feet of additional setback when at the end of the useful life of a structure, it is not unreasonable to expect a slightly lower factor of safety of the coastal bluff.

Regarding Section H.3 - Coastal Hazards Analysis Report Requirements for Beach Front Development in Screening Area A, subsection g.3, we would recommend that the County not force FEMA's east and gulf coast practices on the California coastal zone. FEMA's requirements are necessary to be able to participate in FEMA's Flood Insurance Program; however, this should not be a requirement of coastal development in California.

This requirement appears again in Section H.5 – Coastal Hazards Analysis Report Requirements for Development in Coastal Hazards Screening Area B, subsection d.1. Again, this requirement should be referenced if the applicant wishes to participate in FEMA's Flood Insurance Program.

Figures 1 through 4 are too coarse to be of much value. The County might consider trying to utilize a graphics format similar to the CoSMoS graphic results, enabling better visual detail.

We appreciate the opportunity to review the County's Draft Coastal Zoning Ordinance and would welcome the opportunity to discuss any of these suggestions.

Regards,  
Walt



**Walter F. Crampton, GE, D.CE • Principal Engineer**

ENGEO Incorporated

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**From:** Engstrom, Aaron <Aaron.Engstrom@ventura.org>

**Sent:** Friday, June 21, 2024 4:16 PM

**To:** Walt Crampton <WCrampton@engeo.com>

**Subject:** Public Review Draft Sea Level Rise Policies: Ventura County

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Mr. Crampton,

The County of Ventura has been working on draft Local Coastal Program amendments for sea level rise and the draft amendments are available for public review and comment until July 20<sup>th</sup>. The amendments are available on the webpage here along with a FAQ sheet:

<https://vcrma.org/en/vc-resilient-coastal-adaptation-project>

The County's unincorporated coastline includes a high amount of shoreline protective devices, and these are a topic of interest for the draft amendments. Input from technical experts such as yourself is important to the County and this process. It would be particularly helpful if you could please provide input regarding the Coastal Hazards Analysis Report Requirements located at the end of the Draft Coastal Zoning Ordinance amendments (pages 38-53 in attachment). Please let me know if you would like to schedule a meeting to discuss any thoughts or suggestions regarding the proposed amendments.

Thank you in advance,

## Comment 18



July 20, 2024

To: Aaron Engstrom, Senior Planner, Ventura County  
Cc: Steve Hudson, District Director, California Coastal Commission

Re: Ventura County Draft Local Coastal Program Amendments

Dear Aaron,

Surfrider Foundation is a grassroots organization and our mission is to protect our ocean waves and beaches for all people. We've been working for decades to promote equitable coastal access and coastal preservation. We saved Trestles from a toll road, led the development of the Surfer's Point managed retreat project. We have participated in at least a dozen LCP updates for sea level rise and climate change hazards along with our network of local chapters with the goal of representing the beach-going public and the need to ensure public resources and public trust is protected.

We greatly appreciate the County's efforts to create non-armoring pathways for coastal adaptation such as elevating and relocating structures and building beach berms. The phased approach with trigger points holds promise for adaptation pathways that may help balance public resource protection with private property rights. The County's plan represents a step in the right direction to avoid an over-reliance on emergency permits to address increasing erosion and storm surge related to climate change and rising seas.

It is vital to avoid shoreline armoring as the primary response to coastal hazards. All forms of armoring make erosion worse. As waves collide with hard structures, the energy refracts and prevents sand from settling as it would under normal coastal dynamics. Armoring also takes up beach space, impacts lateral coastal access and coastal habitats, and is unsightly. It primarily is used to protect private property at the expense of public resources and public trust land. As seas rise and coastal hazards increase, we simply cannot rely on armoring lest we wish to sacrifice our very coast that makes California such a unique recreational and biodiversity hotspot and economically prosperous.

We support the following policies that would protect public resources and promote resiliency for the County's coastline, specifically:

- Policy 4.11 to consider non-structural adaptation measures and managed retreat with Caltrans and Union Pacific Railroad.

- Policy 1.17 to require a Coastal Hazards Analysis Report including non-structural solutions for shoreline armoring for SPD applications.

Surfrider has several major concerns regarding the County's proposed shoreline armoring and "Existing Community" policy update.

**1. The County's definition of existing development and substantial redevelopment are not consistent with the Coastal Act as written.**

Existing Development

In policy 1.12, the County's proposed definition would expand rights to shoreline armoring beyond the intent of the Coastal Act and is therefore unlawful. It states:

"For the purposes of this policy, "existing structure" means a legally permitted principal structure, including but not limited to a main dwelling and any internal accessory dwelling, that qualifies as "existing" within the meaning of Section 30235 and that has not subsequently undergone substantial redevelopment (see Policy 1.9)."

The County's definition of existing development refers to "legally permitted principal structures" and refers to section 30235 of the Coastal Act but omits reference to section 30253. These two sections must be considered together to accurately reflect the Coastal Act's shoreline armoring mandates. While section 30253 is mentioned earlier in policy 1.12, it should also be included in the definition, quoted above.

The well-settled Coastal Act prohibition on armoring for new development mandated by Coastal Act section 30253. Coastal Act Section 30253 firmly prohibits new development from in any way requiring or contributing to the construction of protective devices that would manipulate natural landforms along bluffs and cliffs. Section 30253 (b) states that "new development shall...[a]ssure 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."

While Section 30235, referred to in the County's proposed definition, provides some leeway for "existing structures" to be granted protection of "revetments, breakwaters, groins, harbor channels, seawalls, cliff retaining walls and other construction that alters natural shoreline processes," there is no exception in the Coastal Act that would allow armoring for new structures. In utilizing the phrase "existing structures" in section 30235, the Coastal Act drafters felt it was necessary to make the distinction that non-existing buildings should not be permitted to construct defensive shoreline protection devices. When read together, Coastal Act sections 30253 and 30235 evince a broad legislative intent to allow some armoring for development that existed when the Coastal Act was passed, but prohibit armoring for new development. Such action as allowing for rampant armoring, regardless of existing structure location, is squarely

outside the bounds of the Coastal Act and in contravention to long-established coastal protection law. Coastal Act Section 30253 firmly prohibits coastal armoring for new structures, and is not subject to a feasibility analysis. It is incumbent upon local governments to enforce this important coastal protection provision.

Recently, the California State of Appeals court decision in Lindstrom v. Cal. Coastal Commission 2019 made it clear that both the City of Del Mar's LCP and the Coastal Act prohibit the construction of shoreline protection for a new home. By extension, the appeal decision clarifies that a new home does not become 'existing' once it is legally permitted, thus reserving the definition of 'existing development' for structures that existed before the passage of the Coastal Act in 1977. Instead of failing to include a definition of existing development from the LCP, existing development should be defined per the original intent of the Coastal Act: as any structure that existed before the effective start date of the Coastal Act, January 1, 1977. This definition is supported by the recent decision concerning the Lindstrom CDP as well as the Coastal Commission's 2015 Sea Level Rise Guidance document and the draft Residential Adaptation Guidance document.

*As such, we suggest the County's definition include reference to section 30253 and the start date of the Coastal Act, January 1, 1977 and remove reference to "legally permitted principal structures" to avoid ambiguity.*

#### Substantial Redevelopment

Surfrider opposes the County's definition of substantial redevelopment in policy 1.9. This definition is key to limiting shoreline armoring throughout the County. The County's definition accounts for a cumulation of 50% or more of major structural alterations of a structure from the date of certification of the subject LCP amendments. This definition is fundamentally flawed and inconsistent with the Coastal Act.

The Coastal Act grandfathered in development built before January 1, 1977 because those structures were developed before current standards and understanding. This is a common practice with policy development in land use planning and can be reasonably interpreted as such. Development in decades past, before the Coastal Act was enacted, was allowed in sensitive habitats and in sea level rise hazard zones.

We can no longer jeopardize our remaining coastal resources, especially when facing the enormous sea level rise-induced losses that are forthcoming to Ventura County coastlines which are characterized in many sites by short beaches and close proximity to Hwy 1 and railroad beds. Additionally, homeowners and Hwy 1 drivers will likely face more unsafe interaction with sick or injured sea mammals who will strand on their property and the roadway when their beach stranding sites are gone. Great portions of beach, wetland, dune habitat and other coastal resources are likely to drown due to sea level rise across the state. It is vital that we protect our remaining resources for their ecological, recreational, aesthetic, economic and cultural values.

Essentially, local governments and private property owners in the Coastal Zone have already been on notice since January 1, 1977 that new (and new redeveloped) properties are not entitled to shoreline armoring and must be sited outside of coastal hazard zones. This makes practical and economic sense and is a key policy for protecting the public's right to coastal access and public trust resources.

The County's definitions of existing and redevelopment would lock in our current patterns of development within hazardous zones for decades longer than the Coastal Act intends and would likely be too late to save the County's beaches and waves from rising seas and may not be in keeping with models which suggest sea level rise would arrive more quickly at our Ventura County coastlines if the Thwaites Glacier melts more quickly than projected.

*We suggest the County's definition of substantial redevelopment therefore remove the date of certification of the LCP amendment and replace it with January 1, 1977 for consistency with the Coastal Act and the Coastal Commission's sea level rise guidance policies.*

**2. Policy 1.13 is severely inconsistent with the Coastal Act and must be removed entirely.**

Policy 1.13 would create a loophole whereby new development would be entitled to shoreline armoring if it is built within an "Existing Community". This loophole would greatly expand shoreline armoring in the County and perpetuate reliance on shoreline armoring for decades to come. It disincentivizes smart planning away from hazardous locations and will ultimately drown our beaches and waves as seas rise.

As written, this policy is highly problematic for all the reasons discussed in previous sections of this letter and would set a terrible precedent for the state of California. The concept of "existing community" is defined in LUP section 3.3 and includes Rincon Point, La Conchita, Mussel Shoals, Seacliff, Faria, Solimar and Rincon Parkway. Such a policy would essentially open the door for new and redevelopment to use shoreline armoring at these locations and would greatly extend the amount of time that we continue to inhabit hazardous locations and continue to jeopardize the coast.

Nowhere else does the Coastal Act allow new development to rely on shoreline armoring – new or existing and the Commission already rejected this concept in Santa Cruz County, which also did not offer any mitigation or justification for such a policy.

Neighborhood-scale adaptation is commendable in concept

"Neighborhood-scale" programs that are consistent with the Coastal Act, and that facilitate the efficiency of review and approval of SPDs may be considered and may be commendable. Any "neighborhood-scale" program that proposes to permit the construction of Shoreline Protective

Devices (SPDs) that do not meet the limited scope permitted by PRC 30235 and 30253 is contrary to law.

Recognizing that there are inherent tensions between private property law and the Coastal Act, neighborhood-scale programs must take into account the impacts upon public trust resources, as well as upon beach access and coastal recreational opportunities, that necessarily follow from armoring of the coast.

An analysis of the neighborhood-scale approach should undertake an analysis of the public trust impacts of the proposed armoring or other development. Any approval of shoreline development will have impacts on public trust. The Commission (or local government if pursuant to a certified LCP) should analyze the site-specific evidence, and if there is an impact upon the Public Trust, make appropriate findings and take an appropriate action. In an era of sea level rise, the Commission and local governments should be making a public trust finding with respect to every shoreline development or every local area planning effort.

If the County chooses to pursue the neighborhood scale adaptation approach, we strongly suggest a definition of “existing community” that includes pre-Coastal Act (1977) development only). It is important to emphasize that with the exception of what is permitted under PRC §30235, every pertinent Coastal Act policy militates against armoring the coast. Consider the impacts of a seawall. It reduces, and in most cases eventually will eliminate public access; it similarly constraints and will eventually eliminate most forms of public recreation; it has significant impacts on marine resources; it degrades the scenic and visual qualities of the coastal area; and it causes a permanent alteration of the natural land forms of the area. Given these multiple potential impacts to resources protected by PRC §§ 30210, 30220, 30230, and 30251 it is understandable that the Legislature in § 30253 (c) required that new development not “require the construction of protective devices that would substantially alter natural and forms along bluffs and cliffs”, i.e., seawalls. Seawalls are an abomination to the geophysical, biological and human resources of the natural coastline. They provide benefit to the individual property owner behind the wall at the expense of the public and the ecosystem.

*Therefore, we strongly suggest the County remove this policy and undertake a careful planning approach for neighborhood scale adaptation within the confines of the Coastal Act, that includes adequate mitigation for impacts to sand supply, coastal access and recreation, to be approved at a future date.*

### Conclusion

In addition to its legal responsibility under the Coastal Act, the beach is an important economic driver for the County, and could suffer serious economic consequences if the beaches, important sea mammal stranding beaches, and surf are lost to sea level rise. The County has an obligation to the users, visitors, and area consumers for their investment in visiting the community, and our critical marine wildlife who live in and migrate through the Santa Barbara Channel – as well as under the Coastal Act recreation and access policies. Instead of solely



relying on shoreline protection devices, the County's plans should prioritize nature-based soft armoring and living shoreline techniques to protect the coastline and require evaluation of those before resulting to hard armoring. These are multi-benefit solutions that will help us adapt to sea level rise. These solutions offer hope for future generations that they will have beaches and surf to enjoy.

Thank you for considering our comments. We sincerely appreciate the County's efforts thus far to plan for coastal hazards and we look forward to working with you on suitable coastal adaptation strategies for the future.

Sincerely,

Mandy Sackett  
Senior California Policy Coordinator  
Surfrider Foundation

# Comment 19

**Engstrom, Aaron**

---

**From:** Luke, BonnieK  
**Sent:** Friday, July 19, 2024 6:02 PM  
**To:** Engstrom, Aaron  
**Cc:** Boyd, Bill; Convery, Abigail  
**Subject:** RE: Comments - County of Ventura Draft LCP Amendments for Sea Level Rise and Coastal Hazards

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Hi Aaron,

Thank you for providing the opportunity to comment on the draft CZO and CAP changes.

I did not have a lot of time to complete a thorough review of these documents, but below are a few items that stood out that I hope your team will consider addressing:

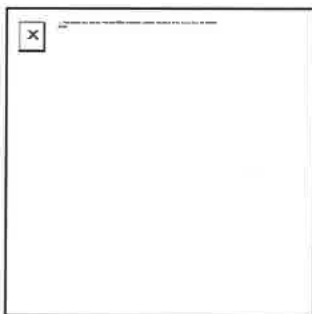
From Policy 1.45 on page 44 of the Coastal Area Plan:

1.45 The County shall review its plans for constructing new essential public facilities such as a hospital, (e.g., fire stations health care facility, emergency shelters, emergency command centers, and or emergency communications facilities), so that these facilities are located outside of at-risk coastal hazards areas whenever feasible. If such a location is infeasible, then the County shall require the use of construction methods and design features to minimize potential damage to these facilities from coastal hazards.





1. The specific referencing of hospitals and health care facilities (as essential public facilities) that is shown as being struck out in Policy 1.45 (above) should be retained in the CZO to maintain consistency with the existing terminology and phrasing within the NCZO. Hospitals and other health care facilities are essential public facilities (as recognized in PFS-1.3 of the General Plan) that are intended to be preferentially sited outside known risk areas whenever possible.
2. Development of critical infrastructure and facilities within the coastal zone is intended to ensure they are sited to minimize risks from hazards, including but not limited to: wildfires, flooding, earthquakes, landslides/mass movements/liquefaction/subsidence, dam/levee failures, coastal erosion, tsunamis, sea-level rise, etc. whenever feasible.
  - a. The proposed substitution of the term '*coastal hazards*' in place of '*at-risk*' or '*hazards*' that is shown above in Policy 1.45 has potentially far-reaching implications. With the proposed change, only development proposed in areas subject to certain specific hazards such as sea-level rise, tsunamis or coastal flooding (e.g. those areas graphically shown in the '*coastal hazards*' overlay) would appear to be required to be evaluated for siting to minimize risks. Development proposed in other mapped or known hazard areas (e.g. for landslides, liquefaction, inland stream flooding, or high wildfire susceptibility) would appear to no longer be required to be evaluated for risk minimization or alternative siting. This would not appear to mitigate risk or be protective of life-safety and resources.

- b. Both the draft CZO and CAP documents should be reviewed thoroughly for other locations where substitution of 'coastal hazards' is proposed to ensure that additional changes to the intent of the policy or ordinance to limit risk and preserve life-safety related to all hazards that may exist is ensured.
3. Reconciliation and consolidation of terms would increase clarity and readability of the CZO and CAP.
  - a. The term 'coastal hazards' also needs to be applied consistently - some locations of the draft documents use it to refer to specific, ocean-related hazards (i.e. sea-level rise and coastal flooding, coastal erosion) while other areas of the text reference 'sea-level rise *and* coastal hazards' suggesting the writer viewed these terms as separate from one another.
    - Identifying more clearly which hazards are included under the umbrella of 'coastal hazards' and conducting deconfliction with terminology used in other federal, state, and County plans and programs will limit confusion for future applicants and decision-makers and ensure greater governmental transparency.
      - For example, reconciling how the term 'coastal hazards' and the 'coastal hazards zone' the Planning Division is proposing is related to (or differs from) the 'coastal flood hazard zones' identified on DFIRMs, and corresponds to tsunami inundation zones and information on sea-level rise, coastal erosion, and flooding hazards and extents discussed within the HMP and modeled by the County's hazard mapper will enhance interoperability of the County's plans and avoid confusion for readers.
  - b. The term 'coastal hazards' should be clearly defined/added to the glossary for the CAP and CZO.
4. The draft CAP and CZO amendments should be updated/revised to better align with the hazard rankings and information/discussion of historical hazard events contained within the 2022 HMP, such as the 1969 floods. Inclusion of discussion of the recent winter storms of 2023 and 2024 is also recommended. The currently proposed language in several areas emphasizes different events, and contains no references to the most recent and significant surf and storm events of the past two years which triggered major disaster declarations and represent some of the largest impacts to the coastal zone area the County has experienced in recent times.

Regards,



**Bonnie Luke**  
Senior Program Administrator, Emergency Services

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 800 S. Victoria Ave.  
 [venturasheriff.org](http://venturasheriff.org)  
 [applyventurasheriff.org](http://applyventurasheriff.org)



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**From:** Engstrom, Aaron <Aaron.Engstrom@ventura.org>

**Sent:** Friday, June 21, 2024 3:47 PM

**To:** Luke, BonnieK <BonnieK.Luke@ventura.org>

Cc: Boyd, Bill <Bill.Boyd@ventura.org>

Subject: RE: County of Ventura Draft LCP Amendments for Sea Level Rise and Coastal Hazards

Hi Bonnie,

In looking at the draft policies there is one worthy on mention to the Sheriff's office. It is Policy 1.45 on page 44 of the Coastal Area Plan. It is basically copying GP policy PFS-1.3 with a few edits for coastal hazards. It is pasted below:

1.45 The County shall review its plans for constructing new essential public facilities such as a hospital, (e.g., fire stations health care facility, emergency shelters, emergency command centers, and or emergency communications facilities), so that these facilities are located outside of at-risk coastal hazards areas whenever feasible. If such a location is infeasible, then the County shall require the use of construction methods and design features to minimize potential damage to these facilities from coastal hazards.

*[Staff comment: This policy is based on a General Plan Climate Action Policy PFS-1.3. It is edited for applicability to the coastal zone. Additions to these "existing" General Plan policies are shown with double-underline, and removals are shown in ~~striketrough~~.]*

---

From: Engstrom, Aaron

Sent: Tuesday, June 11, 2024 9:45 AM

To: Luke, BonnieK <BonnieK.Luke@ventura.org>

Cc: Boyd, Bill <Bill.Boyd@ventura.org>

Subject: RE: County of Ventura Draft LCP Amendments for Sea Level Rise and Coastal Hazards

Hi Bonnie and Bill,

Thank you for your interest in this project. I don't perceive conflicts with the County's HMP, but feel free to let us know if you see any issues with this draft. There is one Program, program number 4.12 in the Coastal Area Plan (pg 51) that directs us to seek funding to improve the evacuation route at Silver Strand. If the Sheriff has any other suggestions or would like to be added to programs for sea level rise planning and coordination, we would be more than happy to consider them.

Comments are due by July 20<sup>th</sup> please.

Thank you,  
Aaron

---

From: Luke, BonnieK <BonnieK.Luke@ventura.org>

Sent: Monday, June 10, 2024 5:34 PM

To: Engstrom, Aaron <Aaron.Engstrom@ventura.org>

Cc: Boyd, Bill <Bill.Boyd@ventura.org>

Subject: RE: County of Ventura Draft LCP Amendments for Sea Level Rise and Coastal Hazards

Hi Aaron,

This is the first we've seen on this topic in quite some time.

Was there internal stakeholder review of the amendments conducted that included deconfliction with other planning actions/efforts like the County's HMP?

What is the window for public comment?

Regards,



**Bonnie Luke**  
Senior Program Administrator, Emergency Services

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 [applyventurasheriff.org](http://applyventurasheriff.org)



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**From:** VC Resilient <[aaron.engstrom@ventura.org](mailto:aaron.engstrom@ventura.org)>

**Sent:** Monday, June 3, 2024 8:13 PM

**To:** Luke, BonnieK <[BonnieK.Luke@ventura.org](mailto:BonnieK.Luke@ventura.org)>

**Subject:** County of Ventura Draft LCP Amendments for Sea Level Rise and Coastal Hazards

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**JOIN US FOR A WORKSHOP! VENTURA COUNTY DRAFT LOCAL COASTAL  
PROGRAM AMENDMENTS FOR SEA LEVEL RISE AND COASTAL HAZARDS**

# Comment 20

Daniel C. Glaser  
[REDACTED]  
[REDACTED]  
Oxnard, CA 93035  
[REDACTED]  
[REDACTED]

SUBJECT: Comments to June 11th, 2024 Sea Level Rise Public Workshop @ Hollywood Beach Elementary

Dear Mr. Engstrom,

Thank you for the opportunity to comment on the Sea Level Rise Project. I am a Silver Strand resident and attended the workshop on June 11 at Hollywood Beach Elementary. I have lived in Silver Strand Beach for the past four years, and Ventura County for the past seventeen years. My vocation is in solar and energy storage, but am an avid surfer and outdoorsman and have greatly enjoyed all that this special region has to offer.

My overall general comment from the Workshop is commending the County on taking an approach that does not involve seawalls and armoring of the coast, but rather a managed retreat such as we have seen with great success at Surfer's Point in Ventura. Understandably this is a difficult and sensitive issue with beach front homeowners, and I am sure will be a contentious topic for those homeowners most at threat.

Silver Strand in particular is a very small community that cares greatly about the beach, access, and safety of all who reside. However, from my experience so far the concept of sea level rise, in addition to the future of the beach, is a topic that is not well known within the community. I applaud the County for putting on workshops such as the one I attended, however my experience has been that the overwhelming majority of residents were not aware of this event and associated plan. Therefore, I would strongly encourage that residents within these communities receive information about the plan and associated workshops via regular mail. I do believe that many residents would respond favorably to taking planning action now, and should be aware of the threats that are posed in the future particularly as it has direct implications on home values and insurability.

Additionally, bringing specific awareness to the following for the community I believe is a necessary part of emergency planning:

1. Inform residents on the flood threat to South Victoria Ave at Hobie Beach. As we have seen in the previous winters, king tides and storm events have already breached the road. Residents should be aware of this, and be advised of alternative evacuation routes.
2. Ensure residents are aware of how to report emergency and/or dangerous storm/flood situations within the neighborhoods.
3. Inform residents of the flood zones within the neighborhood. The color coded map showing the regions that are at highest threat should be made available to homeowners and residents within the region.
4. General construction and dredging: The North Jetty construction project that took place about a year ago did not seem to be well known. I only found out after construction began, and then initiated correspondence to understand the purpose/intent/impact.



Similar to my comment above, I would encourage mailing notifications to go out to all residents prior to large construction projects and bi-annual dredging. Previously living very close to Lifeguard Tower 3, it was rather shocking to have the large, loud dredging equipment operating in the dark.

I do have some specific comments regarding the plan and region I live in, some of which were voiced at the public meeting as follows:

1. **South Victoria Ave at Hobie Beach:** As was shown in slides 33 - 35, the area by Hobie Beach is at severe risk of flooding during a large storm event coupled with king / high tides. I understand that the intent is to start planning a solution by 2030, however I believe the urgency is greater as we have seen just this winter with flooding. Perhaps more importantly, is simply bringing this awareness to the community, and educating on alternative exits to the community.
2. **Building height restriction:** With the proposed elevation of certain homes within the region, it is critical that the existing height restrictions be maintained. The majority of homes in Silverstrand are large relative to the property, with interiors maximized for occupancy. Therefore this is generally very little space between homes already, so maintaining a strict cap on the height of new construction is critical.
3. **AirBnB Restrictions/Notices:** As the level of AirBnBs within the Silver Strand neighborhood is extremely high, I believe it is urgent to focus on further restricting these developments as well as informing the current property owners of the sea level rise threat. There are many of these homes that are of extremely old construction, and will likely be some of the last to be redeveloped in the neighborhood, potentially making them the most susceptible to coastal erosion.

Outside of putting the actual plan into place, one of the largest challenges we will face is insuring homes within the region. As sea level rise continues, high tides coupled with large storm events will continue to cause erosion and threaten not only public access but homes within the harbor region and floodplain. We are seeing this happen in other coastal regions of the U.S. where home values can fall upwards of 75% or more due to erosion, and in the worst cases be condemned. We need to think longer term and enact measures now, or future generations could potentially face a world with a dangerous and/or inaccessible coastline.

Thank you for taking the time to read my comments, and feel free to reach out to me with any questions or for further discussion.

Sincerely,



Daniel C. Glaser

# Comment 21

**Engstrom, Aaron**

---

**From:** Marta Golding Brown [REDACTED] >  
**Sent:** Sunday, July 21, 2024 3:57 PM  
**To:** Engstrom, Aaron  
**Subject:** SCCa Comment Letter: CAP DRAFT Amendments  
**Attachments:** 7-2024 Comment ltr VenturaCounty RMA LCPA.pdf

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Dear Aaron:

Smart Coast California (SCCa) is grateful for the opportunity to submit our comments regarding the current Ventura County June 2024, Public Review Draft: Coastal Area Plan DRAFT Amendments for the Coastal Area Plan in Legislative Format (LCPA.) Please find attached the Smart Coast California (SCCa) comment letter. SCCa is a 501(c)6 organization established in 2019 to promote and advocate for smart land use policies affecting California's 1,271 miles of coastline. The organization is dedicated to community sustainability, property rights and the environment.

Please reach out if there are any questions regarding the comments provided on the June 2024 draft.

Respectfully,  
Marta Golding Brown



**Marta Golding Brown, MPA**  
Co-Founder and CEO  
**Phone:** 661 | 916-5844  
**Email:** [mgbrown@smartcoastca.org](mailto:mgbrown@smartcoastca.org)  
**Web:** [www.smartcoastca.org](http://www.smartcoastca.org)



July 21, 2024

Mr. Dave Ward  
Planning Director  
Ventura County Government Center  
800 S. Victoria Avenue  
Ventura, CA 93009

Delivery via email to : Case Planner Aaron Engstrom, [aaron.engstrom@ventura.org](mailto:aaron.engstrom@ventura.org)

RE: Local Coastal Program (LCP) COASTAL AREA PLAN: Sea Level Rise and Coastal Hazard Amendments  
Public Review Draft June 5, 2024

Smart Coast California (SCCa) is a 501(c)6 organization established in 2019 to promote and advocate for smart land use policies affecting California's 1,271 miles of coastline. Smart Coast California is dedicated to community sustainability, property rights and the environment. SCCa is grateful for the opportunity to submit our comments regarding the current LCPA June 2024, *Public Review Draft: Coastal Area Plan DRAFT Amendments for the Coastal Area Plan in Legislative Format* which is in the public review period until July 22, 2024.

The Public Review LCPA Draft bases its reform and policies on an estimated sea level rise of 6 feet by the year 2150. The Amendments include new policies as well as adjustments to the existing policies within the Ventura County LCP. The County is addressing the risk of sea level rise by suggesting risk mitigation tactics given that with only 2 feet of sea level rise, a number of beaches within the North Coast of the County will be submerged.

Smart Coast California would like to express support for the following policies:

**Adaptation Planning**

**Page 32/33 1.5**

We support portion "b", and its position to protect neighborhoods and minimize potential impacts of sea level rise scenarios.

**Page 34 1.7**

We support policy 1.7 and policy 1.9, specifically portion "d".

**Page 44 1.42 (c)**

We support the policy which requires all Coastal Development Permits authorizing Public Works, an ESHA mitigation plan, and public coastal dependent recreational area projects (pursuant to

Policy 1.41) to include phased adaptation strategies when SLR amounts in conjunction with a 100-year storm could cause adverse effects to the project.

Page 44 1.44

We support the new or expanded public works facilities for life and development for the possible SLR Scenarios and long-range adaptation.

Page 45 Hazards, Sea Level Rise, and Climate Change Goal 2 - Natural Adaptation

We support the use of natural adaptation strategies to protect public land as well as sensitive habitats including but not limited to encouraging evaluations of activities that trap or add sand through methods of beach nourishment and dune restoration amongst other adaptation strategies such as reefs, breakwaters, and artificial headlands.

Page 46 2.8

We support the placement of sediments at appropriate points along the shoreline for the purpose of beach replenishment but suggest softening the language on the grain size and color regulations.

Page 49 4.2 & 4.4

We support policy 4.2, which requires updates to adaptation plans based on the most updated sea level rise science. This policy will be advantageous to limiting the effects of sea level rise as new science comes out and there is more clarity based on monitored conditions. Additionally, we support policy 4.4, which further requires coordination amongst local, state, and federal agencies to work on cohesive proactive adaptation efforts in conjunction with emergency response planning for potential coastal hazards.

### **Tiered Response**

The SLR planning approach of a tiered response triggers specific policies based on observed, measured, and documented sea level rise thresholds, rather than solely on projections. We feel it is imperative to use such a methodology in order to be most proactive regarding situations for sea level rise. For that reason, we support the following policy:

Page 49 4.2

We support policy 4.2, which requires updates to adaptation plans based on the most updated sea level rise science. This policy will be advantageous to limiting the effects of sea level rise as new science comes out and there is more clarity based on monitored conditions. This method of tiered response based on the continuously updated science will provide clarity on the reality of sea level rise rather than predictions of such.

### **Managed Retreat**

We believe the method of managed retreat should only be considered feasible in areas where relocation of developments is possible and where property owners are allowed to defend their homes, businesses, and related infrastructure.

Page 51 4.11

We support policy 4.11 which would require cooperation amongst the county, Union Pacific Railroad, and Caltrans to protect public access to the coast through methods that include

managed retreat and nature-based solutions where applicable, as forms of structural and non-structural adaptation measures.

### **Shoreline Protection Devices and Other Adaptation**

We support the implementation of shoreline protective devices as needed to protect residential and commercial development. Strategies include upgrading and constructing new seawalls, floodwalls, riprap revetments, levees, groins, breakwaters, and elevated roadways.

We support the use of soft shoreline protection such as reefs, over protection devices.

Page 35 1.2

We support the policy to prohibit new developments or substantial redevelopments that will require such devices.

Page 36 1.13

We support this policy that allows maintenance and repair to existing shoreline protection devices.

Page 37 1.17

We support this policy and feel that the hybrid solutions should include reefs with dunes as well.

### **Community-Wide Protection**

We support the goal for community-wide protection for all coastal regions of Ventura County, including that of agricultural and residential regions that face possible flooding or coastal inundation due to future sea level rise. Although, there are no new policies that address the community at large in this new revision.

Page 41 1.35

We support this because the policy does not impact a property owner's rights given by the California State Constitution.

---

Smart Coast California would like to express concern for the following policies and suggest modifications:

Page 22 B "Hazards, Rising Tides, and Beach Erosion"

We feel 2150 is unprecedented, the new Ocean Protection Council numbers should be used for the end of the century.

Page 35/36 1.12

We are confident that an existing structure should be protected when legally existing. Additionally, we feel that there should be an exception for reefs and breakwaters to be utilized,

Page 39 1.24

We feel this policy needs further modification, specifically in the last sentence. We feel that development on the bluff face should include an exception for drainage devices.

Page 39 1.28

We oppose this policy as it is not practical. Sand beach development must be on caissons.

Page 40 1.32

We oppose this policy as there are some emergency permits that will by necessity require caisson supported vertical seawalls.

### **Adaptation Options**

We would like to propose the implementation of more sand retention structures in the area including but not limited to groins and artificial headlands, reefs, and breakwaters.

Further, there is potential for artificial reefs in the most vulnerable areas, such as Point Magu, Port Hueneme, McGrath State Beach, and coastal neighborhoods, which with just four feet of sea level rise could become completely submerged in some areas based on the National Ocean Protection Council SLR Viewer.

Once again, thank you for the opportunity to comment on this document. We are happy to meet with you and provide you with more information about how Smart Coast California supports coastal planning for local jurisdictions as they pursue certified Local Coastal Programs addressing sea level rise. Do not hesitate to contact me at if you have any questions regarding the comments provided here.

Sincerely,

A handwritten signature in cursive script that reads "Marta Golding Brown".

Marta Golding Brown  
Co-Founder and CEO



# Comment 22

**Engstrom, Aaron**

---

**From:** Kim, Jasmin <jasmin.kim@oxnard.org>  
**Sent:** Monday, July 22, 2024 5:52 PM  
**To:** Ward, Dave  
**Subject:** City of Oxnard's Comment Letter on County of Ventura Draft Local Coastal Program Amendments  
**Attachments:** 20240722 - City of Oxnard - Comment Letter on County of Ventura Draft LCP Amendments.pdf

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Hi Dave,

Attached please find our comment letter on the County of Ventura's Draft Local Coastal Program Amendments.

If there are any questions or concerns about the letter, please feel free to contact me or Kathleen Mallory, Planning & Sustainability Manager, at [Kathleen.Mallory@oxnard.org](mailto:Kathleen.Mallory@oxnard.org).  
Thank you very much.

Sincerely,  
**Jasmin Kim, AICP**  
**Planning & Sustainability Supervisor | Principal Planner**  
**Community Development Department**  
214 S C Street | Oxnard, CA 93030  
O: 805-385-3945 | F: 805-385-7417  
[www.oxnard.gov](http://www.oxnard.gov)



**The Community Development service counter is open to the public from 8:00 a.m. to 12:00 p.m., Monday through Thursday, and 9 a.m.- 12 p.m. on alternating Fridays.**

Community Development Department  
214 South C Street  
Oxnard, CA 93030  
(805) 385-7858  
Fax (805) 385-7417  
[www.oxnard.org](http://www.oxnard.org)



July 22, 2024

Dave Ward  
Planning Director  
County of Ventura  
Resource Management Agency  
800 S. Victoria Ave.  
Ventura, CA 93009  
Via Email - [Dave.Ward@ventura.org](mailto:Dave.Ward@ventura.org)

**Subject: Comment Letter on County of Ventura Draft Local Coastal Program Amendments**

Thank you for the opportunity to review and comment on the County of Ventura's (County) Draft Local Coastal Program (LCP) Amendments. As the County and the City of Oxnard (City) have jurisdiction in adjacent areas, many issues affect both jurisdictions and their respective resources. In particular, with respect to climate change and sea level rise and the associated impacts associated with these environmental conditions, it will be important for the County and City to collaborate on hazard risks that are not constrained to jurisdictional boundaries. This is especially important for the areas of Hollywood Beach and Silver Strand, where the County has jurisdiction over the beaches and the City has jurisdiction over the shorefront development within City limits.

With these considerations in mind, the City has the following comments regarding the Draft LCP:

**General Policy and Development:**

- The City appreciates the opportunity to review and comment on adaptation approaches and policies pertaining to hazards that threaten the Coastal Trail and development resources or infrastructure which may impact the City. As the County's plans advance to protect these resources, we appreciate the opportunity to discuss these adaptation approaches.
- The County-managed areas of Hollywood Beach and Silver Strand are adjacent to City limits. To that end, the City supports policies that increase resilience in these neighborhoods. The City would like to collaborate with the County on neighborhood-scale planning efforts that increase community resilience without relying on the redevelopment of individual properties.

**Coordination and Regional Collaboration:**

- The City proposes incorporating language in the LCP that promotes comprehensive planning and effective collaboration between the County's Planning Division, the Harbor Department and the City of Oxnard. Recognizing the unique jurisdictional boundaries and regulatory responsibilities of the City and County, the City encourages early discussions and consideration of varied jurisdictional policies between the County LCP, Harbor Public Works Plan (PWP), and City LCP to promote cohesive adaptation and mitigation measures in the area around the Harbor.
- The Coastal Area Plan of the Draft LCP outlines collaboration between the County and the California Department of Parks and Recreation in efforts to restore and enhance Ormond Beach.

The Ormond Beach Restoration and Public Access Plan (OBRAP), led by the City of Oxnard, the Nature Conservancy, and the State of California Coastal Conservancy (collectively "Project Partners"), is currently underway. The City recommends excluding the California Department of Parks and Recreation (CDPR) from page 63 (Section 4.3.2 A.4) due to their minimal participation in the current OBRAP implementation and omission as a Project Partner.

- The City continues to appreciate and support the County's policies that encourage regional collaboration. The City is also dedicated to working with the County and other regional partners and the Beach Erosion Authority for Clean Oceans and Nourishment (BEACON) to comprehensively address large-scale issues and adaptation opportunities, especially those related to infrastructure maintenance and upgrades, sand management, and the timing of policy implementation.

Thank you in advance for considering our comments on the Draft LCP Amendments. As the City updates its LCP to address challenges posed by rising sea levels and coastal hazards, there will be more opportunities to collaborate with the County. Please feel free to reach out to Kathleen Mallory, Planning & Sustainability Manager, [Kathleen.Mallory@oxnard.org](mailto:Kathleen.Mallory@oxnard.org), should you need to discuss this matter further.

Sincerely,



Jeff Pengilley  
Community Development Director

c: Ashley Golden, Assistant City Manager, City of Oxnard  
Kathleen Mallory, Planning & Sustainability Manager, City of Oxnard  
Jasmin Kim, Planning & Sustainability Supervisor, City of Oxnard  
Aaron Engstrom, Area Plans and Resource Planning Manager, County of Ventura  
Robert Mullane, Resource Management Agency Director, County of Ventura

# Comment 23

Engstrom, Aaron

---

**From:** [REDACTED]  
**Sent:** Monday, July 22, 2024 7:54 PM  
**To:** Engstrom, Aaron  
**Cc:** Jeff Newman  
**Subject:** Comments and Questions Re Draft Coastal Area Plan and Ordinance

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Aaron -

On behalf of the Seacliff Beach Colony Homeowners Association (consisting of 49 residences), I offer a few comments and questions:

1. The Coastal Commission just yesterday published its draft of revised Guidelines. Shouldn't Ventura County defer moving its draft Plan along until those revised Guidelines are completed and could be taken into account?

2. Owners will be allowed to repair and maintain existing shoreline protective devices (SPDs) with a zoning clearance process rather than through a lengthy and expensive Coastal Development Permit (CDP). This is very good. But the draft Plan says that a CDP will be necessary if mechanized equipment is needed on the beach to do the necessary repair and maintenance. That essentially eliminates the zoning clearance route, since almost all repair and maintenance of SPDs in the residential communities like Seacliff must be done from the beach side, where rocks have fallen. This has always been done at Seacliff to repair and maintain our revetment. Mechanized equipment should be allowed through some simplified process, without needing to obtain a CDP. It should be easy to impose conditions which would be protective of the beaches.

3. I believe that it was stated at the informational meeting on June 12 that existing SPDs could be repaired and maintained, but not increased or enhanced in response to SLR. But the draft Plan recognizes that increases or enhancements will be needed and allowed, including as permitted under Section 30235. For instance, on p. 25 of the draft Plan, it is noted that Seacliff and Hobson Beach Park are protected by a rock revetment built by Caltrans; and it is stated that "[t]he shoreline protective device may need enhancements as the sea level rises." It would be accurate and useful for the Plan to state clearly that SPDs can be increased or enhanced in response to SLR through the zoning clearance process, without a CDP. Perhaps this can be incrementally tied to certain levels of SLR over time. This should be particularly so where the SPD is needed to protect important infrastructure like the Seacliff offramp, Hwy 1, sewer lines, railroad lines, etc. (Caltrans has recognized and agreed that the Seacliff revetment, which is owned by our HOA, is necessary to protect not only the homes at Seacliff, but also the 101 offramp and Hwy1. This is recognized in a Court Judgment against Caltrans and the State Lands Commission.)

4. I could not find any details about how, where and when SLR would be measured under the Plan. (Maybe I just missed it?)

5. It is very good that the draft Plan puts "managed retreat" into a very low priority of adaptation strategies to adjust to SLR. There are a few adaptation options which should be specifically provided for, including "living shorelines," groins, reefs, breakwaters, sand replenishment and other sand retention and creation structures.

Thanks very much for the opportunity to provide these questions and comments, and for your hard and long work on this project!

Sincerely - Steve Harbison for the Seacliff Beach Colony Homeowners Association

Stephen F. Harbison

[REDACTED]  
Ventura, California 93001

[REDACTED]  
[REDACTED]  
[REDACTED]

# Comment 24

**Engstrom, Aaron**

---

**From:** Ventura County Planning Division <vcrma@ventura.org>  
**Sent:** Monday, July 22, 2024 5:38 PM  
**To:** Engstrom, Aaron  
**Cc:** RMA ITS  
**Subject:** New submission from VC Resilient Comments

**You have a new comments submission:**

**First Name:** kate

**Last Name:** larramendy

**Email:** [REDACTED]

**Zip Code:** 93001

**Comments:** To Whom it May Concern,

My husband and I attended the workshop offered at Fire Station 25 on June 11th. We'd like to share observations and concerns regarding planning for sea level rise. We have been residents of Faria Beach for over 40 years. Faria differs from the other enclaves along Pacific Coast Highway between Emma Wood and Seacliff in ways that pertain to the proposed accommodations and adaptations to sea level rise.

Faria is divided into three sections, east of Mondos Cove, Mondos Cove to Faria Road, and Faria Road. Unlike Seacliff and Solimar, Faria Beach ocean front property owners are responsible for maintaining their own seawalls, each wall being different in construction than their neighbors. Additionally, the scale of homes on Faria Road differs significantly from those on PCH due to C.C.&R. s limiting beachside homes on Faria Road to a twelve foot height limit (measured from the center of Faria Road.) This height limit allows for having ocean views from homes on the north side of Faria Road while at the same time fostering sense of community and scale.

On page 24 of the VC Resilient Coastal Adaptation Project document shows a home simulating a build using raised baseline elevation and current county height limit. It appears inconsistent if not contrary to the concept of managed retreat and coastal resiliency and certainly, appears way out of scale for the community.

The proposal of raising foundations potentially increases the possibility of seawater passing under homes and causing flood damage to existing infrastructure of Pacific Coast Highway, underground utilities, and even the railroad. This seems the opposite resilient development. Rather than establishing building codes that only increase the size and scale of potential new homes, the county should consider reasonably limiting the size and scale of homes, keeping more in line with the concept of managed retreat. Rather than only raising the elevation of new homes, consider increasing the setback of homes from their seawalls/revetment where possible; raise the height of existing seawalls/revetment (this could be done by a small increment, create catch basins immediately behind seawalls to expedite seawater return reducing inland flooding and prohibit beachfront decks from extending over seawalls.



I think it is critically important that, in the presence of increased base foundation elevations, some by as much as 4-6', that all the current regulations regarding height, setback, lot coverage and general scale, should not automatically be applicable to a raised structure. Rather than maintaining existing building codes simply added on top of higher foundations, new codes need to be thoughtfully considered and adjusted for the new reality if we are to maintain a reasonable, humane and livable scale.

# Comment 25

**Engstrom, Aaron**

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**From:** Miranda, Jude@DOT <Jude.Miranda@dot.ca.gov>  
**Sent:** Monday, July 22, 2024 5:11 PM  
**To:** Nielsen, Donald  
**Cc:** Carlin, Cassandra@DOT; Moreno, Cesar@DOT; Edmonson, Miya R@DOT; Engstrom, Aaron; Ward, Dave  
**Subject:** RE: Draft Ventura County Sea Level Rise Amendments  
**Attachments:** VenturaLCP\_D7Comments.pdf; VenturaCZO\_D7Comments.pdf

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No worries Donald. Thank to your team once again for presenting during our SR 1 Meeting. We appreciate the coordination between Caltrans and Ventura County, especially your review of our SR 1 Climate Resiliency and Transportation Safety Plan and the opportunity to review the LCP Amendments.

Please see the attached documents containing our comments. As mentioned before, we may have additional comments forthcoming and will schedule a follow-up meeting as needed. Please feel free to schedule a follow-up meeting if you have questions and remarks regarding the comments we provided.

Best,

Jude Miranda  
Associate Transportation Planner  
Caltrans District 7 | Climate Change Adaptation Planning  
[Jude.Miranda@dot.ca.gov](mailto:Jude.Miranda@dot.ca.gov) | (323) 303-6386

---

**From:** Nielsen, Donald <Donald.Nielsen@ventura.org>  
**Sent:** Monday, July 22, 2024 4:45 PM  
**To:** Miranda, Jude@DOT <Jude.Miranda@dot.ca.gov>  
**Cc:** Carlin, Cassandra@DOT <Cassandra.Carlin@dot.ca.gov>; Moreno, Cesar@DOT <Cesar.Moreno@dot.ca.gov>; Engstrom, Aaron <Aaron.Engstrom@ventura.org>; Ward, Dave <Dave.Ward@ventura.org>  
**Subject:** RE: Draft Ventura County Sea Level Rise Amendments

**EXTERNAL EMAIL.** Links/attachments may not be safe.

Hello Jude,

Thank you for your email. I apologize for my late reply, I have had a solid day of meetings. Unfortunately we cannot grant a time extension for comments on this project. However, we can schedule a future meeting to discuss the project so you have a better understanding. Additionally, below are the links to our June 10<sup>th</sup> Public Workshop that goes over a lot of information and breaks down the amendments.

- June 10<sup>th</sup> Public Webinar: [https://www.youtube.com/watch?v=1HvUwLE\\_IRI](https://www.youtube.com/watch?v=1HvUwLE_IRI)
- June 10<sup>th</sup> Public Webinar Slideshow: <https://vcrma.org/docs/images/pdf/planning/Misc/sea-level-rise-briefing-slideshow-6-10-2024.pdf>

Please let me know any available dates you may have to meet with us in the next couple of weeks.

**Donald Nielsen** | Senior Planner  
He/Him/His  
Area Plans and Resources  
[donald.nielsen@ventura.org](mailto:donald.nielsen@ventura.org)

Ventura County Resource Management Agency | Planning Division  
P. 805.650.4047  
800 S. Victoria Ave., L #1740 | Ventura, CA 93009-1740



**COUNTY of VENTURA**  
Resource Management Agency

---

**From:** Miranda, Jude@DOT <[Jude.Miranda@dot.ca.gov](mailto:Jude.Miranda@dot.ca.gov)>  
**Sent:** Monday, July 22, 2024 2:35 PM  
**To:** Nielsen, Donald <[Donald.Nielsen@ventura.org](mailto:Donald.Nielsen@ventura.org)>  
**Cc:** Carlin, Cassandra@DOT <[Cassandra.Carlin@dot.ca.gov](mailto:Cassandra.Carlin@dot.ca.gov)>; Moreno, Cesar@DOT <[Cesar.Moreno@dot.ca.gov](mailto:Cesar.Moreno@dot.ca.gov)>  
**Subject:** FW: Draft Ventura County Sea Level Rise Amendments

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Good afternoon Mr. Nielsen,

This is Jude Miranda from Caltrans D7's Climate Change Branch. Thank you for the opportunity to review the Ventura County LCP. We are currently gathering comments from various reviews but a few have asked for additional time. Would it be possible to provide comments piecemeal after today's deadline?

Best,

Jude Miranda  
Associate Transportation Planner  
Caltrans District 7 | Climate Change Adaptation Planning  
[Jude.Miranda@dot.ca.gov](mailto:Jude.Miranda@dot.ca.gov) | (323) 303-6386

---

**From:** Engstrom, Aaron <[Aaron.Engstrom@ventura.org](mailto:Aaron.Engstrom@ventura.org)>  
**Sent:** Monday, July 22, 2024 2:31 PM  
**To:** Miranda, Jude@DOT <[Jude.Miranda@dot.ca.gov](mailto:Jude.Miranda@dot.ca.gov)>  
**Subject:** Automatic reply: Draft Ventura County Sea Level Rise Amendments

**EXTERNAL EMAIL. Links/attachments may not be safe.**

Hello, I am out of the office until Monday July 29, and will respond when I return.

If you are submitting comments for the Draft Local Coastal Program Amendments for Sea Level Rise and Coastal Hazards by the due date of Monday, July 22, thank you for participating in this important project. If you have questions about submitting comments or require a verification that your comments were received, please send the comments to Senior Planner Donald Nielsen at [Donald.Nielsen@Ventura.org](mailto:Donald.Nielsen@Ventura.org).

Please contact Senior Planner Abigail Convery for other requests at [Abigail.Convery@Ventura.org](mailto:Abigail.Convery@Ventura.org)

Thank you,  
Aaron Engstrom  
Planning Manager  
[Aaron.Engstrom@ventura.org](mailto:Aaron.Engstrom@ventura.org)

## B. Coastal Trail Classifications

## C. Coastal Trail Maps

## D. Coastal Trail Implementation

*[Staff comment: No changes are proposed to Sections 4.1.4, Subsections A through D.]*

## E. Coastal Trail Goals and Policies

### Coastal Trail Goal 1 – Trail Alignment and Access

To provide a continuous trail route along coastal areas of Ventura County that forms a part of the statewide California Coastal Trail system and provides access to other trails, the shoreline, public recreational opportunities, and coastal points of interest.

#### Policies

- 1.1 The California Coastal Trail (Coastal Trail) shall be provided through unincorporated Ventura County, and shall be located as close to the ocean as feasible, preferably along the shoreline or within sight or sound of the sea.
- 1.2 <sup>2</sup> The County's Coastal Trail includes both Multi-Modal and Single-Mode Routes, and the Multi-Modal Route (Figure 4.1-1) shall connect to Coastal Trails segments in Santa Barbara County, Los Angeles County, and the cities of Ventura, Oxnard and Port Hueneme. Additional routes may be identified that are parallel to specific segments of the Multi-Modal Route to improve access and connectivity.
- 1.3 The Coastal Trail maps (Figures 4.1-1 – 4.1-7) shall be used to determine the general alignment of the Coastal Trail through unincorporated Ventura County. However, the provision of additional trail routes shall not be precluded on the basis that the trail route is not shown on the Coastal Trail maps. In addition to the Coastal Trail routes shown on Figures 4.1-1 – 4.1-7, the Coastal Trail may include, but is not limited to, the following:
  - Alternative alignments established through public trail easements acquired through voluntary conveyance, acquisition, conveyance to satisfy conditions of approval of a *coastal development permit*, or other means; and
  - Historic use trails where prescriptive rights exist, that provide a new or alternate Coastal Trail segment, or easements that provide a link between the mapped Coastal Trail and shoreline beaches or recreation areas – such as recorded *vertical access* easements, easements established via prescriptive rights, and public access rights reserved as offers to dedicate.
- 1.4 Mapped Coastal Trail routes shall be located on public land or within existing or acquired easements authorizing public use.
- 1.5 The Coastal Trail shall provide access to the County's recreational, natural, scenic, and historic resources or sites. Wherever feasible, ensure that trail segments are accessible to all members of the public, including citizens with disabilities.
- 1.6 Wherever possible, provide connections between the mapped Coastal Trail (Multi-Modal and Single-Mode Routes) and other existing or planned trail systems, vertical shoreline access points, transit stops, and *coastal access* parking or trail staging areas. (See Figures 4.1-1 – 4.1-7).

# Summary of Comments on Draft Coastal Area Plan SLR Public Review Draft

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Page: 20


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 Number: 1 Author: s144639 Subject: Sticky Note Date: 7/22/2024 2:54:26 PM

General Comment would be it would be nice to include in the unedited sections of the LCP in this document as the sections are referenced and we have to go to the old document to view those.

 Number: 2 Author: s144639 Subject: Highlight Date: 7/22/2024 2:50:20 PM

Please review CT's Road to Resilience Study as it outlines both Climate Resilience and Active Transportation improvements improvements that could for the SR1 Corridor.

 Author: s144639 Subject: Sticky Note Date: 7/22/2024 2:52:51 PM

Please coordinate with CT Complete Streets for any segments of the Coastal Trail along CT's ROW. There may be grant or funding opportunities to assist in implementing the Coastal Trail.






JUNE 2024, PUBLIC REVIEW DRAFT: COASTAL AREA PLAN **DRAFT** AMENDMENTS FOR  
SEA LEVEL RISE AND COASTAL HAZARDS

- 1.7 Sea level rise scenarios shall be considered evaluated according to Section 4.1.6, Goal 1, and Policy 1.3 when establishing the alignment of, and design standards for, any segments of the Coastal Trail located within an area with coastal hazards, except the evaluation is not required if a segment is proposed on a sandy beach area.

*[Staff comment: The Coastal Trail, with the exception of segments on beaches, is development that should include planning for sea level rise. The two main components used to plan for sea level rise are the scenarios and the expected life of development described in the new section, Section 4.1.6.B.]*

- 1.8 Additional routes may be located further from the ocean where such routes provide ocean views, offer recreational opportunities, serve specific user groups, connect to other trail networks or public lands, or allow the trail to be moved landward in response to sea level rise.
- 1.9 Coastal Trail routes shall avoid Environmentally Sensitive Habitats (ESHA) to the maximum extent feasible. However, routes for hikers/walkers are considered a resource dependent use and may be located in ESHA and ESHA buffer zones where sited and designed to protect ESHA against any significant disruption of habitat values.
- 1.10 Coastal Trail routes should provide specialized trail segments for specific user groups or an alternative trail experience and enhanced access to the County's coastal beaches, coastal upland areas, public parks, or natural and scenic features.
- 1.11 Coastal Trail routes shall remain free from impediments such as gates, guardhouses, and other structures that block access to or along the Coastal Trail.
- 1.12 Organized group events, such as a bicycle race, on segment C-3 (Naval Air Road) shall not restrict NBVC-Point Mugu gate access or otherwise impede military training and operational missions. Such events require prior authorization from the U.S. Navy.
- 1.13 Coastal Trail segments may be allowed within areas with current or future coastal hazards, including sea level rise, provided that such uses are consistent with all other applicable policies and provisions of the LCP. Consideration shall be provided for the maximum connectivity and continued functionality and utility of Coastal Trail segments.
- 1.14 Segments of the Coastal Trail shall be designed to be resilient to coastal hazards and sea level rise through integration of siting and design features that enable retrofits or relocation if they become damaged from erosion, flooding, or inundation and it is no longer feasible to repair or maintain them. Where feasible, any trail segment that is closed, removed, or reduced in size shall be replaced at an appropriate location to ensure public access and recreational resources are protected, maintained, and enhanced. Adaptive management measures specifying when maintenance, retrofits, and/or relocation will occur shall be required as a condition of permit approval.
- 1.15 When railroad rights-of-way are abandoned, the County shall evaluate the feasibility of acquiring the land for public use as public coastal access, transportation, bicycle, pedestrian, or equestrian paths.

*[Staff comment: This policy is based on a General Plan Climate Action Policy CTM-2.26. Additions to these "existing" General Plan policies are shown with double-*

	Number: 1 Author: s144639 Subject: Highlight Date: 7/22/2024 3:14:14 PM
	Which SLR scenarios does the LCP Amendment use? The OPC 2024 Guidance dropped during the amendment process.
	Number: 2 Author: s144639 Subject: Highlight Date: 7/8/2024 1:16:05 PM
	Number: 3 Author: s144639 Subject: Highlight Date: 7/8/2024 1:16:17 PM

underline, and removals are shown in ~~strike through~~ to illustrate the extent of amendments to these policies, which are currently applicable to the coastal zone.]

## Coastal Trail Goal 2 – Trail Design

[Staff comment: No further changes are proposed to Section 4.1.4]

### F. Coastal Trail Programs

[Staff comment: No changes are proposed to Section 4.1.4 (F).]

#### 4.1.5 Tree Protection

[Staff comment: No changes are proposed to Section 4.1.5.]

#### 4.1.6 Hazards, Sea Level Rise, and Climate Change

[Staff comment: Sections A and B are new text that address sea level rise planning.]

##### A. Introduction





[Staff comment: This introduction is new text.]

The County's year 2018 Sea Level Rise Vulnerability Assessment ("2018 Vulnerability Assessment") revealed that Ventura County will face considerable challenges adapting to sea level rise. Residential properties, critical transportation infrastructure, as well as high-value coastal recreation areas are vulnerable to erosion, flooding, tidal inundation, wave events, and, as time progresses, sea level rise. Agricultural lands and environmentally sensitive habitat areas, such as sand dunes and estuaries, are also expected to increasingly be affected by coastal hazards and sea level rise.

Ventura County is no stranger to addressing coastal hazards. On average, floods that cause major damage within Ventura County occur every five years.<sup>1</sup> The "Great Flood" of 1969 washed out bridges, caused oil spills, and resulted in tragedy when the Ventura and Santa Clara Rivers jumped their banks to reach the sea. Large swells wrought by coastal storms in 1983 caused 15-foot waves combined with 6-foot-high tides to crash into beach-front residences. The El Nino climate event in 1998 damaged over \$1 million of crop value near Calleguas Creek, and again in 2005 resulted in the La Conchita hillside slope failure which damaged dozens of homes and resulted in 10 deaths. In 2017 and 2018 the Thomas, Hill, and Woolsey wildfires burned through coastal areas. Global climate change is anticipated to exacerbate these natural events, melt polar ice sheets, and to fuel thermal expansion of the oceans, causing sea level rise to increase the frequency, duration, and extent of existing coastal hazards. Without any adaptation measures or actions, oceanfront residential property is potentially vulnerable to erosion and coastal flooding with less than one foot of sea level rise. Small, narrow beaches on the North and South Coasts will be constrained between rising tides and 18 miles collectively of shoreline protective devices and may be lost within the next few decades. Adaptation strategies will be needed to reduce hazards and conserve vulnerable beaches that support a thriving coastal recreational and tourism industry. Similarly, Environmental Sensitive Habitat Areas (ESHAs) such as the estuary at the mouth of Rincon Creek, Snowy Plover nesting habitat at Hollywood Beach, and the Ormond Beach wetlands, will experience sea level-induced higher tides, flooding, and more extreme erosion that can adversely affect coastal habitat and ecosystem functions.

Footnotes:

<sup>1</sup> 2015 Multi-Jurisdictional Hazard Mitigation Plan

	Number: 1 Author: s144639	Subject: Highlight	Date: 7/8/2024 1:18:03 PM
	Number: 2 Author: s144639	Subject: Highlight	Date: 7/22/2024 3:17:16 PM
	An area of concern for CT as well and has been identified as one of our more vulnerable locations in the District.		
	Number: 3 Author: s144639	Subject: Highlight	Date: 7/8/2024 1:18:44 PM
	Number: 4 Author: s144639	Subject: Highlight	Date: 7/8/2024 1:19:02 PM



Consistent with California Coastal Commission guidance, the County is updating the Local Coastal Program to require use of the best available science to reduce hazards and protect coastal resources. The policies in this section will support adaptation and mitigation of impacts from coastal hazards while helping to safeguard development from sea level rise as appropriate. Furthermore, methods for coastal hazards analysis and reporting are described in Appendix 15.

## **B. Hazards, Rising Tides, and Beach Erosion**

*[Staff comment: This section includes new policies and introductory text derived from the County's Sea Level Rise Adaptation Report, and it also integrates existing policies and text for hazards and beach erosion from the sub-areas Sections 4.2.4, 4.3.4, 4.3.5, 4.4.4 and 4.4.5.]*

Scientific scenarios of future coastal hazards indicate that with approximately 6 feet of sea level rise, or by approximately year 2150, Central Coast beaches will be about half of today's width. Narrow beaches and coves on the North and South Coasts will be inundated daily at high tide. These effects are likely to occur sooner when combined with coastal erosion, damaging coastal storms, and if the current rate of polar glacier melt rapidly accelerates.

### **I. North Coast Sub-Area**

#### **A. Hazards**

The North Coast skirts the edge of a geologically complex and active area. Within the coastal zone boundaries is a portion of the Santa Ynez Mountains, formed by thrust faulting and east-west fold. Sedimentary Miocene marine terraces reach from the mountains to the ocean, where they have been eroded to prominent sea cliffs.

Underlying the area is the Red Mountain Thrust Fault and its branches, including the Padre Juan Fault (Figure 4.2-7). There has been seismic activity in this fault zone within the past 20,000 years. Under the Alquist-Priolo Act of 1972, the California Division of Mines and Geology designated the Red Mountain Fault as a "special studies zone" (Figure 4.2-8). This means that engineering geology reports may be required for some new coastal zone development within the designated area. Included within the special studies zone is a portion of the La Conchita Community, the La Conchita oil and gas processing facility, and the Rincon oil and gas processing facility. Ventura County has adopted an ordinance that implements the Act.

Short periods of low to moderate groundshaking are create a potential North Coast hazards. Low coastal terraces could be subject to liquefaction where groundwater is less than 15 feet from the surface. Tsunamis could occur along the North Coast where elevations are less than 30 feet above mean sea level. Landslides and mass earth movement pose severe hazard potential where slopes are greater than 25 percent (Figure 4.2-7). Construction, grading, seismicity, irrigation, septic tanks and intense rainfall all contribute to erosion and slope failure. Moderate to highly expansive soils interlaced throughout the area also contribute to slope instability. Submarine landslides occurred in nearby Goleta in 1812, when several earthquakes rattled the area. Reports of sea waves and flooding indicated that rancheria-living locals retreated inland to avoid the hazard. Earthquakes with a magnitude of approximately seven have occurred within the Santa Barbara Channel and resulted in a sudden sea level rise of about six vertical feet (CGS 2014). The Pitas Point and Lower Red Mountain Faults have generated measurable earthquakes and these faults located in and near the North Coast have the potential to generate tsunamis in the range of 13 to 23 feet (Ryan et al. 2015). Mud Sslides and flooding closed the North Coast

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 Number: 1 Author: s144639 Subject: Highlight Date: 7/8/2024 1:19:15 PM

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 Number: 2 Author: s144639 Subject: Highlight Date: 7/22/2024 3:24:43 PM

Does the LCP identify Landslide Risk near the coast? According to the CA Dept of Conservation Landslide Susceptibility Data most of North and South Coast are areas of vulnerability.

 Author: s144639 Subject: Sticky Note Date: 7/22/2024 3:24:46 PM

<https://data.ca.gov/dataset/cgs-map-sheet-58-deep-seated-landslide-susceptibility/resource/4446fc19-da22-4dd7-ab68-f2918b0509d3>

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that of "storage" beaches and "stable" beaches. A stable beach maintains a wide minimum beach width and a storage beach is one that exhibits extreme natural variability and at times has no measurable beach width (Griggs 2007).

The North Coast beaches are highly vulnerable to erosion and wave damage. Dredging operations in Santa Barbara Harbor alter sand transport down coast. The effects of sediment impoundment from dams, maintenance of shoreline protective devices, and the trucking of sediment from landslides to inland locations have resulted in an approximately 40% reduction in sand supplied to the coast (Willis and Griggs 2003, and Runyan and Griggs 2003). Without adequate replacement sand and other beach management strategies, high tides, waves, and sea level rise will continue to erode the beaches. Beachside designated "Existing Communities" are losing sandy shorelines during these times, and seawalls shoreline protective devices are being undermined, critically endangering residences. Affected areas are:

Extending south from the northern County boundary, the following developed areas are vulnerable to hazards:

- Rincon Point: This existing community lies along the only North Coast beach without extensive shoreline protective devices. Seasonal fluctuations in sand often reveal a cobble berm beach. Rincon Creek flooding damaged residences in 2016. Rincon Point is classified as a stable beach with high variability in its average beach width. Seasonal beach widths can fall 50 meters below average maximum widths.
- Mussel Shoals: Exhibits seasonal fluctuations in the amount of sand. A seawall had to be constructed during the 1978 winter storms. Erosion is gradual now, but may accelerate later. The California Department of Navigation and Ocean Development (DNOD) has noted the area to be "Present Use Critical," which means that existing shoreline facilities are subject to erosion from wave action (Appendix 4). This small existing community includes approximately 48 residential units, a hotel, and a shuttered pier and causeway for an offshore oil well. The Rincon Island oil drilling and production facility is being decommissioned. Where the community fronts the beach, rock revetments meet coastal waters and a seasonal dry sandy beach. The angled shoreline of the community helps dissipate wave energy. (Final Report Technical Review of FEMA CCAMP for Ventura County 2017). Privately owned rock revetments have been constructed since the 1978 winter storms.
- Seacliff: Homes flood during storms and high tides. Construction of the U.S. Highway 101 overpass north of the colony obstructed sand transport and beach replenishment. To retard erosion at Seacliff and Hobson County Park, Caltrans built a seawall that is now deteriorating. Current zoning allows for the construction of further beach residential units. However, unless the seawall is reviewed for structural adequacy, more flooding may occur. This is another small existing community with approximately 49 residential units that are protected by a community-owned rock revetment. The southern end of the community is adjacent to Hobson County Park. The community is vulnerable to flooding during storms and high tides. Historically, construction of the U.S. Highway 101 overpass north of the community obstructed sand transport and beach replenishment. To protect Seacliff and Hobson County Park, Caltrans built a revetment in 1972 in response to increased erosion that resulted from the construction of Highway 101, and again in 1983 as part of CalTrans development plans. This revetment was modified in 2014 for maintenance and to improve public accessways. Seacliff is identified as a storage beach with beach widths reaching a maximum of 50 meters at the highest average peak width.

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Number: 1 Author: s144639 Subject: Highlight Date: 7/8/2024 1:36:40 PM

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Number: 2 Author: s144639 Subject: Highlight Date: 7/22/2024 3:40:41 PM

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These could also be included in future CT Climate Resilience and Corridor Plans for coordination/improvement

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Webb 1976). The 1973 Point Mugu earthquake is believed to have originated on the Malibu Coastal Fault.

The South Coast immediately along the coast shows high potential for liquefaction in the area of Calleguas Creek and Mugu Lagoon.





- **1 Landslides and Slope Stability** – In general, the Santa Monica Mountains contain highly expansive soils. The soils, together with the steep topography, tend to increase the frequency of *slope* failure and erosion. According to the Ventura County Public Works Agency, grading, increased irrigation or septic *runoff*, and seismic activity may also trigger *slope* movement or erosion.
- **2 Flood Hazards** – Calleguas Creek is a major flood corridor in the South Coast. It flows along the northern *slopes* of the Santa Monica Mountains to the Mugu Lagoon. Severe flooding has occurred along the coastal zone portion of this corridor, resulting in damage to adjacent agricultural crops, transportation facilities, and the military base. Except for Naval Base Ventura County, the lower reaches of the creek are generally undeveloped. The Ventura County Public Works Agency does maintain a system of channels and levees and maintains flood control.

~~There are also a number of creek corridors within the Santa Monica Mountains (e.g., Big Sycamore, Little Sycamore, Deer Creek, etc.) that could pose extreme flood and erosion hazards to Pacific Coast Highway and new development.~~

- **3 Fire** – Fire is significant natural hazard in the Santa Monica Mountains. ~~The Ventura County Hazards Appendix classifies the entire Santa Monica Mountains area as "extreme" for fire hazard. Cal Fire classifies the Santa Monica Mountains as a very high fire hazard severity zone.~~ While many of the *slopes* contain safe coastal vegetation, the fire-adapted chaparral of drier *slopes* along with steepness, lack of moisture and rainfall conditions, and severe *emergency access* constraints, can combine to create a dangerous situation, such as the Woolsey Fire that started in the Santa Susana Mountains near Simi Valley and burned to the sea and closed Pacific Coast Highway in 2018. This event destroyed over 1,600 structures, and burned over 96,000 acres of land. Periodic burns are considered a natural event in chaparral communities, and fires should be anticipated as a regular occurrence; however, climate change will increase the intensity and frequency of fires. Secondary impacts of fires in this area include mudflows, landslides, and erosion due to loss of ground cover.

The Santa Monica Mountains are currently designated "Open Space" (one *dwelling unit* per 10 acres minimum) and "Recreation" (state park lands). In some areas of the Santa Monica Mountains, however, 40-100 acre minimum *lot* sizes are justified based on water availability, *access*, *slope*, geologic and fire hazards. For these reasons, it is necessary to maintain the Santa Monica Mountains as "Open Space," and also to investigate the application of 40-100 acre sub-zones where *access* to County-maintained roads is inadequate, and where severe *slopes* increase the potential for geological instability.

~~The General Plan's Hazards Appendix (e.g., Chapter 7, Hazards and Safety Element) includes a number of land use policies, as well as County programs, to address natural hazards including (but not limited to) wildfires, coastal flooding and flood hazards, and debris flows. The General Plan policies and programs account for flood, wildfire, and sea level rise events that are predicted to be more frequent and severe due to climate change in order to adapt to climate change impacts and increase the County's resilience. provides extensive information on various hazards, including fault zones, fire hazard areas, landslides, and flood plains. It is one of the principal documents consulted by Planning and the Public Works Agency when formulating an initial study on a proposed project to~~


	Number: 1 Author: s144639 Subject: Highlight Date: 7/22/2024 3:45:55 PM
	This corridor has experienced a large number of landslide/washout events requiring emergency projects to clear. Past feasibility studies have identified some solutions, but coordination for more long-term solutions would be ideal.
	Number: 2 Author: s144639 Subject: Highlight Date: 7/22/2024 3:47:04 PM
	see previous comment regarding Calleguas Creek. Coordination between County, CT, and the Naval Base in the near future to discuss possible solutions in the areas around Mugu Lagoon.
	Number: 3 Author: s144639 Subject: Highlight Date: 7/8/2024 1:41:58 PM
	Number: 4 Author: s144639 Subject: Highlight Date: 7/8/2024 1:42:20 PM




*[Staff comment: This policy is based on a General Plan Climate Action Policy AG-6.2. It is edited for applicability to the coastal zone. Additions to these "existing" General Plan policies are shown with double-underline, and removals are shown in ~~strikethrough~~.]*

- 2.12 The County shall encourage landowners to participate in voluntary programs that reduce soil erosion, coastal erosion and increase, and protect and maintain soil productivity that could be vulnerable to sea level rise and/or other coastal hazards. ~~To this end, the County shall promote coordination between the Natural Resources Conservation Service, Ventura County Resource Conservation District, University of California Cooperative Extension, and other similar agencies and organizations.~~
- [Staff comment: This policy is based on a General Plan Climate Action Policy COS-5.3. It is edited for applicability to the coastal zone. Additions to these "existing" General Plan policies are shown with double-underline, and removals are shown in ~~strikethrough~~.]*
- 2.13 The County encourages coordinate with regional stakeholders to assess vulnerabilities from the effects of, and enhance coordinated the resiliency to, sea level rise on for estuaries, wetlands, and groundwater basins. This assessment should consider factors that influence the conditions of an estuary or wetland, including sea level rise, rainfall, surface heat budget, wind, and ocean acidification.
- [Staff comment: This policy is based on a General Plan Climate Action Policy HAZ-1. It is edited for applicability to the coastal zone. Additions to these "existing" General Plan policies are shown with double-underline, and removals are shown in ~~strikethrough~~.]*
- 2.14 The County shall place a high priorityize on preserving designated Open Space lands in the coastal zone for recreation, habitat protection and inland migration, wildlife movement, flood hazard management, public safety, water resource protection, and overall community benefit.
- [Staff comment: This policy is based on a General Plan Climate Action Policy COS-9.3. It is edited for applicability to the coastal zone. Additions to these "existing" General Plan policies are shown with double-underline, and removals are shown in ~~strikethrough~~.]*
- 2.15 The County should work with the Beach Erosion Authority for Clean Oceans and Nourishment (BEACON), The Port of Hueneme, Ventura Port District, Channel Islands Harbor, cities, and Naval Base Ventura County to identify issues and establish common goals and objectives regarding sediment management, as well as to identify resources to meet defined goals.
- 2.16 The County shall continue to plan for the preservation, conservation, efficient use of, enjoyment of, and access to coastal resources, as appropriate, within Ventura County for present and future generations.
- 2.17 The County shall work with federal, state, and local jurisdictions, agencies, and organizations to assess the vulnerability of public coastal access points and recreation areas and evaluate ways to ensure that these areas are provided for present and future generations.
- 2.18 The County encourages community programs that are designed to improve the quality of coastal fisheries and marine resources.
- 2.19 The County supports efforts by other agencies and organizations to maintain and enhance estuarine systems in order to protect and enhance coastal fisheries and other marine resources.

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 Number: 1 Author: s144639 Subject: Highlight Date: 7/22/2024 4:00:08 PM  
Please include CT for any regional sediment management plans along State ROW. Sand nourishment and Sediment Management are some of the few nature based/soft-solutions advocated for future CT climate adaptation/resilience projects

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 Number: 2 Author: s144639 Subject: Highlight Date: 7/8/2024 2:02:00 PM

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- d. In important scenic areas, where aboveground transmission line placement would unavoidably affect views, undergrounding shall be required where it is technically and economically *feasible* unless it can be shown that other alternatives are less environmentally damaging. When aboveground facilities are necessary, design and color of the support towers shall be compatible with the surroundings to the extent that safety and economic considerations allow.

For information on permitting requirements for existing *Public Works* facilities, see Section 8174-6.3.2 and Section 8174-6.3.6(a)(9). For *Public Works* Facilities in *ESHA* or *buffer zone*, also see Section 8178-2.

## **Sec. 8175-5.12 - Shoreline Protection Devices**

### **Sec. 8175-5.12.1 - Standards**

The following standards shall apply to the construction or maintenance of *shoreline protective devices* such as (e.g., seawalls, jetties, revetments, groins, or breakwaters, and bluff retaining walls):

- a. ~~Proposed shoreline protective devices shall only be allowed when they are necessary to protect existing developments, coastal dependent land uses, and public beaches.~~ Proposed shoreline protective devices shall be permitted in conformance with the LCP and Coastal Act Sections 30235 and 30253. Shoreline protective devices or other such construction that alters natural shoreline processes shall be permitted when required to serve coastal-dependent uses or to protect existing structures or public beaches in danger from erosion, when designed to eliminate or mitigate adverse impacts on local shoreline sand supply and when no less environmentally damaging alternative is feasible. New, enlarged, or extended shoreline protective devices shall not be permitted unless alternatives that are required to be analyzed by Section 4.1.6, Policy 1.17 of the Ventura County Coastal Area Plan are determined to be infeasible or to be more environmentally damaging. For the purposes of this section, "existing structure" means a legally permitted *principal structure*, including but not limited to a main *dwelling* and any internal *accessory dwelling*, that qualifies as "existing" within the meaning of Section 30235 and that has not subsequently undergone *substantial redevelopment* (see Section 4.1.6, Policy 1.9 of the Ventura County Coastal Area Plan, as may be amended). *Shoreline protective devices shall not be allowed for the sole purpose of protecting private accessory structures or landscape features (e.g., garages, carports, storage sheds, decks, patios, walkways, landscaping).*
- b. As a condition of approval of a coastal development permit authorizing the demolition or substantial redevelopment of an existing residential, commercial or industrial principal structure (see definition in Article 2 and Appendix H1 ) that is protected by an existing, legally permitted shoreline protective device, the permittee shall thereafter be prohibited from enlargement or extension of the shoreline protective device but may seek authorization to repair and maintain the device if it is part of a community-wide shoreline protective device required to protect existing development entitled to shoreline armoring in a designated Existing Community, and removal is not feasible. Where the shoreline protective device is located on the project site, this condition of approval shall require the permittee to remove the shoreline protective device when it is no longer necessary. Where the shoreline protective device is located

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 Number: 1 Author: s144639 Subject: Highlight Date: 7/22/2024 4:21:38 PM

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*Cesar Moreno: Caltrans recognizes the potential for adverse impacts on coastal resources from shoreline protective devices as discussed in Section 8175.5.12.1(a) of the Local Coastal Program (LCP) Coastal Zoning Ordinance (CZO). Caltrans also recognizes that Coastal Act Section 30235 lists certain types of development that may allow shoreline protection, including coastal-dependent uses, existing structures, and public beaches in danger from erosion, and that the Coastal Act specifies that such protection is only approvable "when designed to eliminate or mitigate adverse impacts on local shoreline sand supply." Shoreline protective devices may be lawfully allowed in these circumstances and may represent a reasonable short- to mid-term SLR adaptation strategy. This may be especially true where critical infrastructure exists, and where a shoreline protective device is the least environmentally damaging alternative within the context of phased adaptation responses.*


*While the proposed amendment to Section 8175.5.12.1(a) of the LCP CZO aligns with Coastal Act Section 30235, the proposed amendment goes a step further and defines "existing structure". According to the Coastal Commission's Sea Level Rise Policy Guidance, "the most reasonable and straight-forward interpretation of Coastal Act Sections 30235 and 30253 is that they evince a broad legislative intent to allow shoreline protection for development that was in existence when the Coastal Act was passed, but avoid such protective structures for new development now subject to the Act". Caltrans District 7 has previously coordinated with the County of Ventura and has received permits from the Coastal Commission for shoreline protective device projects along Pacific Coast Highway (e.g., Mugu Secant Walls Project) where the roadway itself was considered a "pre-Coastal Act existing structure". Given this, Caltrans recommends that the proposed amendment to Section 8175.5.12.1(a) reflect the established interpretation of Coastal Act Sections 30235 and 30253 as it relates to existing structures.*

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 Number: 2 Author: s144639 Subject: Highlight Date: 7/8/2024 12:47:09 PM

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 Number: 3 Author: s144639 Subject: Highlight Date: 7/8/2024 1:08:04 PM

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## ARTICLE 8: GENERAL DEVELOPMENT STANDARDS/CONDITIONS – RESOURCE PROTECTION

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### Sec. 8178-1 – Purpose

The purpose of this Article is to provide *development* standards and conditions necessary for the protection of environmental and other resources in the *coastal zone*. This Article must be used in conjunction with any specific *development* standards found in Articles 5, 6, and 7, and with all provisions and policies of the LCP Land Use Plan, to determine all the standards and conditions for a proposed *development*.

### Sec. 8178-2 – Environmentally Sensitive Habitat Areas (ESHA)

*[Staff comment: No changes are proposed to Section 8178-2; however standards for sea level rise planning for shoreline ESHA were included in those amendments.]*

### Sec. 8178-3 – Archaeological and Paleontological Resources

*[Staff comment: No changes are proposed to Section 8178-3.]*

### Sec. 8178-4 – Mitigation of Potential Hazards

#### Sec. 8178-4.1

All new *development*, and *substantial redevelopment*, shall be evaluated for potential impacts to, and from, geologic hazards (including e.g., seismic hazards, landslides, expansive soils, and/or subsidence, etc.), flood hazards, and fire hazards. New *development*, and *substantial redevelopment* that is proposed in a Coastal Hazards Screening Area (see Appendix H1), shall also be evaluated for coastal hazards (including coastal flooding, beach or coastal bluff erosion, coastal bluff slope failure, and/or wave impacts) factoring in the effects of sea level rise for the anticipated life of the proposed development in accordance with Section 4.1.6, Policy 1.4 and 1.5 of the Ventura County Coastal Area Plan, as may be amended. New *development* and/or *substantial redevelopment* shall be sited and designed in compliance with the LCP to minimize risks to life and property in areas such as floodplains, bluffs, 20% or greater slopes, or shorelines, where such hazards may exist.

1. New *development* and *substantial redevelopment* shall be sited and designed so as not to cause or contribute to flood hazards, or lead to the expenditure of public funds for flood control works. Feasible mitigation measures and design features shall be required where necessary.
2. New development and substantial redevelopment in Coastal Hazards Screening Areas shall be sited and designed to avoid hazards, taking into account predicted sea level rise over the expected life of the development factoring in the effects of the sea level rise scenarios. New development and substantial redevelopment shall assure stability and structural integrity of the development without reliance on a shoreline protective device.



Number: 1 Author: s144639 Subject: Highlight Date: 7/22/2024 4:32:49 PM

Please forward future developments/substantial redevelopments adjacent to CT ROW to the District's Local Development Review Branch for review on potential impacts to CT Operations and Assets



## **Appendix H1**

### **COASTAL HAZARDS SCREENING AREA MAPS AND COASTAL HAZARDS ANALYSIS REPORT REQUIREMENTS**

*[Staff comment: This appendix describes the technical analysis required for new and substantial redevelopment when it is proposed in Coastal Hazards Screening Areas A or B. The reports need to include analysis of current and future floor elevations with sea level rise in order for a development application to be approved.]*

#### **H.1 Introduction**

This appendix sets forth the Coastal Hazards Analysis Report preparation requirements applicable to new development and substantial redevelopment located within areas potentially subject to hazards. Section 4.1.6 of the Coastal Area Plan requires applicants for substantial redevelopment in Coastal Hazards Screening Areas A and B (as illustrated in Maps 1, 2, and 3 located at the end of this Appendix) to prepare and submit a Coastal Hazards Analysis Report that includes the materials described in Sections H.3 and H.5 below to demonstrate the development would be sited and designed for resilience to coastal hazards and protective of coastal resources for its expected lifetime. Applicants for new, enlarged, or extended shoreline protective devices are also required to submit a Shoreline Protective Device Evaluation as described in Section H.4 below. When new development and substantial redevelopment in Coastal Hazards Screening Area A or B is proposed in an area with known geologic hazards, then a Geologic Hazards Analysis Report that is described in H.2 shall also be required.

The Expected Life of Development Table in Section 4.1.6 of the Coastal Area Plan (Policy 1.4, Table 1) identifies the planning horizon years and which sea level rise scenario to use in Coastal Hazards Analysis Reports. The flood risk during "highest projected amount of sea level rise" that will occur at the end of the planning horizon is required to be evaluated for structural design, as further described in the specific requirements below. The County's Discretionary Permit Application should be referenced to determine the highest projected amount of sea level rise to use during Coastal Hazards Analysis Reports. These applications are periodically updated to include the latest sea level rise scenarios published by the State of California to reflect the best available science (See Section 4.1.6 Goal 1 Policy 1.2 of the Ventura County Coastal Area Plan).

#### **H.2 Geologic Hazards Analysis Report**

New development and substantial redevelopment in an area with known geologic hazards, on a bluff, or in Coastal Hazards Screening Areas A or B, require a Geologic Hazards Evaluation prepared by a qualified California licensed professional (e.g., Civil Engineer, and/or Coastal Engineer, Professional Geologist, Engineering Geologist, or Geotechnical Engineer). More than one separate technical professional expertise may be necessary for each application. The Planning Director in consultation with the Public Works Director shall determine if and when a hazards analysis is required and the adequacy of any submitted evaluations prior to consideration of a Coastal Development Permit or approval of a Planned Development Permit. Some evaluations may require peer review by a technical specialist to be deemed adequate. The County will impose a fee on applicants to cover the cost of peer review of evaluations.

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 Number: 1 Author: s144639 Subject: Highlight Date: 7/22/2024 4:34:40 PM

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Lillian Cai: Geologic Hazards Analysis Report is required in areas on Coastal Hazards Screening Areas A & B.

Coastal Hazards Analysis Report is required for Screening Areas A.

Shoreline protective device requires site-specific hazards evaluation.

Coastal Hazards Analysis Report is required for still water in Coastal Hazards Screening Areas B.

Caltrans Staff will ensure that future projects will comply with the requirements laid out in the CZO



# Comment 26

**Engstrom, Aaron**

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**From:** Charles Caspary [REDACTED]  
**Sent:** Monday, July 22, 2024 5:11 PM  
**To:** Engstrom, Aaron  
**Cc:** Charles Caspary  
**Subject:** Re: LCP CAP comments  
**Attachments:** RELATIVE SEA LEVEL CHANGE at Santa Monica Gauge.doc

WARNING: If you believe this message may be malicious use the Phish Alert Button to report it or forward the message to Email.Security@ventura.org.

Santa Monica Tidal Record attached

On Mon, Jul 22, 2024 at 8:54 AM Charles Caspary [REDACTED] wrote:

I appreciate the opportunity to comment.

I will observe that engaging the public in these Discussions is problematic, given that the last input we were able to provide was in 2021. At that time, discussion and public input on sea level rise policies was suspended. It is clear that the Coastal commission and Ventura County staff continued discussions and workshops. in informulating these changes.

COMMENTS FOLLOW

Page 31.

Development policies 1.2.

Coastal shoreline protective devices protect Rincon highway, which provides public access to public beaches. Private development in this area relies on privately funded. shoreline protective devices. These devices protect the private property and protect Rincon highway at the same time, an play a vital role in providing public access. This contribution must be recognized in this development policy. The last shoreline protective device improvement constructed by Caltrans at Emma wood beach cost the public approximately \$11,000. per linear foot.

Development policies 1.3.

As written, this policy artificially limits sources to consider when discussing best available science. This type of limitation is wrong as it specifies that state guidance Must be used (even if it is not the best science.) Additionally, Any guidance provided by any agency that has the effect of regulations and does not comply with the Administrative Procedures Act should not be considered.

Limiting historical measurements to Santa Barbara tidal gauge is not correct. The Santa Monica type gauge provides a longer and more accurate record of actual tides for the last 100 years. As written, this policy requires state guidance to be considered to the exclusion of other sources of science, including those published by NOAA.

Development policy 1.12.

This section discusses what protective devices shall be permitted based on a undefined. Reference to existing structures. As you are well aware, the coastal commission has defined existing to mean various

things over time. Existing must be defined as what exists as of the time of permit filing and added to this section.

Development policy 1.13.

The staff comment is very straightforward And clearly spells out County intent. It should be added to the actual language contained in this section.

Development policy 1.14.

Mitigation measures discussed in this section show that a glaring omission is the contribution of beach replenishment that is limited by existing practices of Ventura County Flood control in the operation of their debris basins. These debris basins are typically excavated on a regular basis and materials that would have provided beach replenishment are hauled inland and encapsulated in a landfill in perpetuity.

Goal number 2 must include a requirement that. 100% of material excavated from county. Flood control basins must be delivered to the beach at appropriate points to provide beach replenishment. The discussion of appropriate material is not based on any logic. It must be recognized that county flood control interrupts the natural processes and transport of beach replenishment material. Add Ventura County flood control to responsible agencies identified in section 2.15.

The county's failure to appropriately provide these materials as part of a beach replenishment program Contributes to a narrowing of beaches and could constitute taking.

Adaptation goals, section 2.8

Artificial restrictions on physical characteristics of acceptable beach replenishment material should be deleted from this section. This section, as drafted, would likely have prevented the cobble material from being added at surfers point. As science develops, the criteria will change and the restrictions contained herein will prove to be counterproductive and contributory to narrowing of beaches. The construction of artificial reefs must be made a high priority. Benefits include shoreline protection because wave intensity and shoreline erosion is reduced, new habitat for marine organisms is created, water quality is improved and carbon is sequestered.

Respectfully submitted,

Charles Caspary

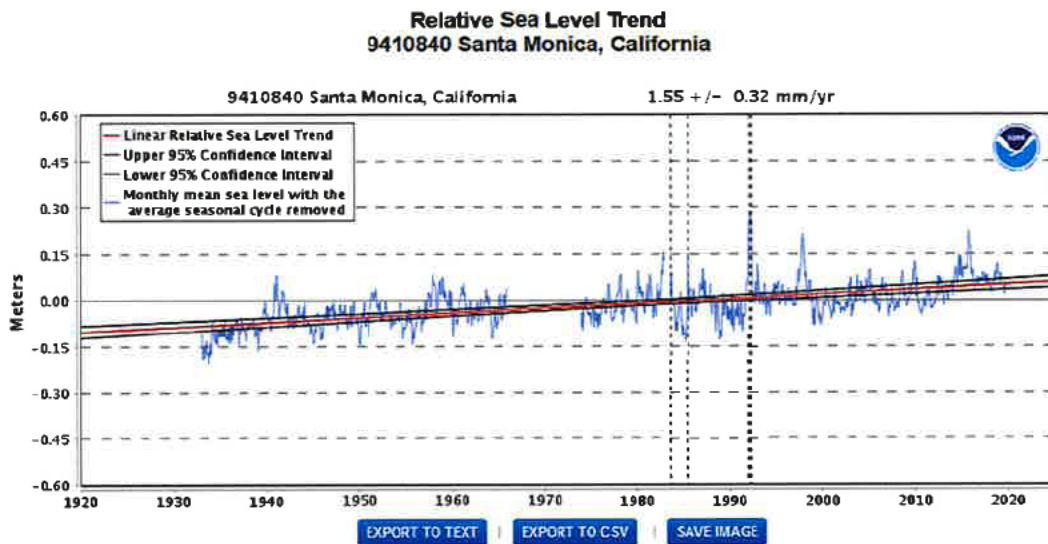
[REDACTED]

**RELATIVE SEA LEVEL CHANGE IS EQUIVALENT  
TO AN INCREASE 0.51 FEET  
IN THE LAST 100 YEARS  
OR  
1/16 of an inch per year**

**The Santa Monica gauge has the longest historical tidal record in the area,  
now 100 years of data.**

Chart Downloaded 12/29/2019 from

[https://co-ops.nos.noaa.gov/sltrends/sltrends\\_station.shtml?id=9410840](https://co-ops.nos.noaa.gov/sltrends/sltrends_station.shtml?id=9410840)



**The relative sea level trend is 1.55 millimeters/year with a 95% confidence interval of +/- 0.32 mm/yr based on monthly mean sea level data from 1933 to 2018 which is equivalent to a change of 0.51 feet in 100 years.**

The plot shows the monthly mean sea level without the regular seasonal fluctuations due to coastal ocean temperatures, salinities, winds, atmospheric pressures, and ocean currents. The long-term linear trend is also shown, including its 95% confidence interval. The plotted values are relative to the most recent Mean Sea Level datum established by CO-OPS. The calculated trends for all stations are available as a [table in millimeters/year and in feet/century](#) (0.3 meters = 1 foot). If present, solid vertical lines indicate times of any major earthquakes in the vicinity of the station and dashed vertical

# Comment 27

**Engstrom, Aaron**

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**From:** Lousen, Kendall P CIV USN NAVB VCTY PT MUGU CA (USA)  
<kendall.p.lousen.civ@us.navy.mil>  
**Sent:** Tuesday, July 23, 2024 1:03 AM  
**To:** Engstrom, Aaron  
**Cc:** Sussman, Shelley  
**Subject:** NBVC Comments on County of Ventura Draft LCP Amendments for Sea Level Rise and Coastal Hazards  
  
**Importance:** High

Greetings Mr. Engstrom,

On behalf of Naval Base Ventura County (NBVC), I would like to take this time and express our appreciation to the Ventura County Planning Division for the opportunity to review the Ventura County Resilient Coastal Adaptation Project, as it relates to the County of Ventura Draft Local Coastal Program (LCP) Amendments for Sea Level Rise and Coastal Hazards.

Please see our comments on pdf document found online at:

[https://vcrma.org/docs/images/pdf/planning/Misc/Coastal\\_Area\\_Plan\\_SLR\\_6-5-2024\\_Public\\_Review\\_Draft.pdf](https://vcrma.org/docs/images/pdf/planning/Misc/Coastal_Area_Plan_SLR_6-5-2024_Public_Review_Draft.pdf), as below:

- Overall, Installation Staff felt there needs to be more specific strategies on ensuring sediment makes it to the coastlines/beaches from upland watersheds.
- Installation Staff share concern regarding need for collaboration and maintenance of critical public roadways for emergency evacuation of base personnel/neighboring communities; maintaining Strategic Highway Network (STRAHNET) and other critical routes (i.e. US Highway 101, Victoria Avenue, State Route 1 /PCH, Las Posas Road, etc.) between Communities and DoD installations (mainly NBVC and MCBP) to support, rapid, and efficient safe transport/movement of DoD personnel, military troops, and equipment and equipment.
- Installation Staff didn't see any considerations for cumulative studies when a new groin/revetment structure would be established to protect new development; not only cumulative impacts at the site, but cumulative down-coast impacts for the coastal plan consideration needs to be a factor in this County of Ventura Coastal Area Plan Update.
- General observation: Naval Base Ventura County is often referred to as Point Mugu Naval Station, Naval Air Station Mugu, or Navy Base Ventura; the nomenclature is inconsistent throughout the document. Recommendation is to have it called out at "*Naval Base Ventura County (NBVC), Point Mugu*" or "*Naval Base Ventura County (NBVC), Port Hueneme*".
- Page 36 (Paragraph Section 1.14), Installation Staff believe this section needs to be more clear that any shoreline devices established should be part of a larger plan so that structures are placed where it is appropriate and not create a checkerboard of structures/impervious pavements that can change surface runoff flow patterns/rates, and also impact downstream properties.
- Page 36 (Paragraph Section 1.22), Installation Staff share concern that the DRAFT amendments to the Ventura County Coastal Area Plan does not carefully evaluate down-coast cumulative impacts/sand deficits to coastlines and beaches.
- Page 47 (Paragraph Section 2.15), Installation Staff recommend that the word "should" needs to be replaced with "shall"; in addition, NBVC Staff also recommend collaborating with Southern California Coastal Water Research Project Dr. Eric Stein - Southern California Coastal Water Research Project (sccwrp.org). Dr. Eric Stein, Phone: (714) 755-3233 / Email: [erics@sccwrp.org](mailto:erics@sccwrp.org).

- Page 51 (Paragraph Section 4.10), Installation Staff recommend that the County shall also coordinate with the Channel Islands Air National Guard Station and NBVC, and others, in plan development/technical review of a Climate Change Impact Assessment for the County of Ventura regional landscape.
- Page 64 (Paragraph Section 'Hollywood Beach and Silver Strand Beach'), Installation Staff recommend that Sentence 2 should read as follows: *"2. The County will coordinate with the cities of Oxnard, Port Hueneme, and, as necessary, U.S. Navy (Naval Base Ventura County, Port Hueneme), in an attempt to help alleviate traffic and illegal parking problems."*

Thanks again for the opportunity to review to submit comments on Draft LCP/Coastal Area Plan Amendments for Ventura County Sea Level Rise & Coastal Hazards; much appreciated.

V/r,

Kendall Lousen ("Kenny")

Installation Community Planner & Liaison Officer (CPLO)

Naval Base Ventura County

☎ Office: (805) 294 - 9360

✉ Email: Kendall.p.lousen.civ@us.navy.mil

# Comment 28

**Engstrom, Aaron**

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**From:** Chisum, Colter  
**Sent:** Monday, July 29, 2024 2:41 PM  
**To:** Engstrom, Aaron; Cooper, Jeri  
**Subject:** RE: Sea Level Rise LCP Amendments

Aaron,

We have looked at this a few times and we would like to see other minor structures (like the Hobson and Faria concession buildings) added to the 20 year resiliency requirement.

We are also interested in a clause that covers the following concept:

Where a Public Works Initiated Project is determined to be cost-prohibitive due to the 75-year resiliency requirement, a lower resiliency threshold may be considered. The lower resiliency threshold shall not be less than the project's economically feasible design life. In other words if a project is found to be cost beneficial at a 35 year resiliency model with a 35 year design life and is cost prohibitive at 75 years, the 35 year resiliency design requirement can be applied.

I know this concept will need some work, but we do plan to upgrade the Faria restroom, concession and shower to be a combined building. We want it to be resilient but also something that can be implemented.

Thanks for the opportunity to comment.

Best,  
Colter

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**From:** Engstrom, Aaron <Aaron.Engstrom@ventura.org>  
**Sent:** Friday, June 21, 2024 3:40 PM  
**To:** Chisum, Colter <Colter.Chisum@ventura.org>; Cooper, Jeri <Jeri.Cooper@ventura.org>  
**Subject:** Sea Level Rise LCP Amendments

Hi Colter and Jeri,

You might be aware that Planning has been working on draft Local Coastal Program (LCP) amendments for sea level rise and you should have received notification that the draft amendments are available for public review and comment until July 20<sup>th</sup>. The amendments include the Coastal Area Plan and Coastal Zoning Ordinance, and they are available on the webpage here:

<https://vcrma.org/en/vc-resilient-coastal-adaptation-project>

Now through July would be a good time for GSA to consider review and any comments for us to include in the next round of revisions. The main approach is to elevate new principal development when it is rebuilt. Since the parks



are a coastal dependent use and provide public beach access, there wouldn't be very many new requirements for the parks. However, if redevelopment of buildings or modifications to shoreline protective devices are planned, there would need to be some analysis and design for sea level rise. To facilitate your review, here is brief guide of sections and policies relevant to Hobson and Faria County Parks, and the Rincon Parkway:

Coastal Area Plan

Page 25: Updated narratives describing shorelines and hazards at the County Parks and along Rincon Parkway

Page 32: Policy 1.4, Expected life of development table, the building at County Parks would likely be included with Restrooms (i.e. plan resilience for 20 years) or more substantial structures would be planned as Public Works Initiated Projects (75 years).

Page 34: Policy 1.8 Requires Principal structures to be designed with 1 foot of freeboard over FEMA or Sea Level Rise Scenario elevations

Page 43: Policies 1.41 and 1.42 provide a list of exceptions to the sea level rise development standards for Public Works Projects and coastal dependent recreation projects

Page 44: Policy 1.44 requires SLR planning for Capital Improvement Projects along the coast

Page 45: Policy 1.48: carries GP program PFS-D into LCP and requires County to seek funding to plan for SLR in its facilities.

Page 48, Policy 3.4: encourages EV charging installation at County facilities.

I'd be happy to schedule a meeting to discuss the proposed amendment with you—just let me know please. Please send any comments before the end of July.

Thank you,  
Aaron

**Aaron Engstrom**

Planning Manager, Area Plans and Resources Section

[aaron.engstrom@ventura.org](mailto:aaron.engstrom@ventura.org)

Ventura County Resource Management Agency | Planning Division

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# Commenter 29

**Engstrom, Aaron**

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**From:** Kennedy, Ashley  
**Sent:** Friday, July 19, 2024 4:01 PM  
**To:** Engstrom, Aaron  
**Cc:** Debley, Sean; Krone, Timothy; Cabral, Roxy  
**Subject:** Draft Coastal Area Plan & Coastal Zoning Ordinance Amendments - EHD Comment  
**Attachments:** Coastal Area Plan and Ordinance comments EHD Memo 7-18-24.pdf

Good afternoon Aaron,

Please find attached EHD's public comment for the Draft Coastal Area Plan Amendments and the Draft Coastal Zoning Ordinance Amendments. We have concerns that this project has not been circulated to the reviewing agencies for comment. There are changes in the documents that various agencies will need to implement, and we should be notified of these changes.

In addition to the comments in the memo, how will the requirements of AB-2234 affect reviews of the Coastal Hazards Analysis Report, or will the hazards only be analyzed as part of a discretionary review?

Thank you,

**Ashley Kennedy, REHS** | Supervising Environmental Health Specialist, Technical Services Section  
Ashley.Kennedy@ventura.org

Ventura County Resource Management Agency  
Environmental Health Division  
P. (805) 654-2821 | F. (805) 654-2480  
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Visit our website at [vcrma.org/divisions/environmental-health](https://vcrma.org/divisions/environmental-health)





## MEMORANDUM

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**DATE:** July 18, 2024

**TO:** Ventura County Planning Division

**FROM:** Timothy Krone, Ventura County Environmental Health Division

**SUBJECT:** **Draft Coastal Area Plan and Zoning Ordinance Amendments**

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The Environmental Health Division (EHD) has reviewed the Public Review Draft of the Coastal Area Plan Sea Level Rise and Coastal Hazard Amendments and the Draft Coastal Zoning Ordinance Amendments. The Division has the following comments:

1. Coastal Area Plan Section 4.4.5 includes the following language regarding the "208" Areawide Water Treatment Management Plan:

*Under the current "208" Areawide Water Treatment Management Plan, a study of septic tank problems in the Santa Monica Mountains was completed in January 1980 by the Environmental Health Division. Several options were proposed that could alleviate present septic tank problems. Included was a recommendation that a septic system management entity be established (or an on-site wastewater management zone) to ensure proper inspection, maintenance and control.*

Section 4.4.5 Policies Section supports the establishment of a "208" management plan:

1. *The recommendation of the "208" Plan Septic Tank Problem Area-Santa Monica Mountains Study for the establishment of a septic system maintenance district will be supported.*

EHD proposes to remove language associated with the "208" management plan. This information is outdated and no longer supported by Environmental Health. Informational resources related to OWTS management are now found in the Ventura County's Local Agency Management Plan (LAMP).

2. Coastal Area Plan Section 4.4.5 has a brief description of privately owned wells and the determination of an adequate water supply:

*Adequacy of water supplies for mountain areas is determined by on-site inspection by the Environmental Health Division of the County.*

This statement is inaccurate. Adequate water supply quantity is determined through the Public Works Agency well-permitting processes. Water quality is verified by EHD during building permitting processes. Both components are evaluated through a Certification of Water Quality, which is approved by EHD, to establish a private well as an "adequate water supply."

3. Coastal Area Plan Section 4.4.5 includes the following language regarding new septic systems:

*New septic systems shall be located as far landward as feasible. Avoid locating new septic tank systems on beaches to the maximum extent feasible. If avoidance is not feasible, minimize elements of the system that are on beaches and design the system to minimize adverse impacts to ESHA and water quality and to withstand the sea level rise and exposure to erosion that is projected for the expected life of the development as demonstrated in a Coastal Hazards Analysis Report (see Section 4.1.6-Goal 1, Policies 1.2 and 1.3, and Coastal Hazards Screening Area Maps in Appendix 15).*

*[Staff comment: Out of all the County's developed unincorporated coastal areas, only the South Coast community of Solromar lacks sewer service, so this policy would only apply to development in the South Coast area.]*

La Conchita is an unincorporated coastal area that is unsewered. Although this is not a directly beach front community, it is identified in multiple sections of the Area Plan. Consider including a similar policy for the North Coast subarea.

4. New septic system requirements have been added to Coastal Area Plan Section 4.4.5 (see #3 above). This addition includes details about the inclusion of new septic systems in the Coastal Hazards Analysis Report. The Coastal Hazards Analysis Report requirements, as found in Appendix H of the Coastal Zoning Ordinance, do not specifically mention septic systems. There are some cursory references to wastewater and sewage, but nothing specific to septic systems. Consider including septic systems as an identified structure requiring analysis in the Coastal Hazards Analysis Report.

If you have any questions, please contact Timothy Krone at [Timothy.Krone@ventura.org](mailto:Timothy.Krone@ventura.org) or 805/654-5040.