

# EXHIBIT 6

## Cumulative Impacts Analysis

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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 6 - Cumulative Impacts Analysis

## INTRODUCTION

This exhibit provides analysis of cumulative impacts that could result from the proposed coastal hazards and sea level rise Local Coastal Program (LCP) amendments. The proposed LCP amendment package for coastal hazards and sea level rise includes updated goals, policies, and programs in the Coastal Area Plan (CAP). In the Coastal Zoning Ordinance (CZO), the amendment package includes a set of regulatory standards that implement policies in the CAP along with maps illustrating the proposed Coastal Hazard Screening Areas (screening areas).

Certification of the proposed LCP amendments would not result in cumulative adverse impacts to coastal resources. No changes are proposed to existing land use maps, allowed uses, or the intensity of development, and the proposed amendments would not authorize new development that is not already permitted by the current LCP. The proposed amendments would require for development and substantial redevelopment in screening areas a site-specific technical analysis demonstrating design for resilience to coastal hazards and sea level rise.

According to CEQA Guidelines Section 15355:

*“Cumulative impacts” refer to two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts.*

- a. The individual effects may be changes resulting from a single project or a number of separate projects.*
- b. The cumulative impact from several projects is the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time.*

The remainder of this exhibit provides a summary of the potential cumulative impacts for the proposed LCP amendments.

## ADAPTATION to COASTAL HAZARDS and SEA LEVEL RISE

The proposed amendments would add a new “Hazards, Sea Level Rise, and Climate Change” section in the CAP (Section 4.1.6), implementing zoning standards and an appendix that outlines the requirements for Coastal Hazards Reports. These policies and development standards would generally require increased elevation of new development in the screening areas in order to accommodate coastal flooding and withstand forces that could cause significant structural damages. Overall, the proposed amendments would be beneficial to public health and safety by requiring new development and substantial redevelopment to be designed for resilience to coastal hazards and sea level rise.

Below is a summary describing why the proposed amendments limit the potential for cumulative impacts. The proposed three goals, 75 policies, and 13 programs are intended to plan for risk, encourage natural adaptation, and reduce greenhouse gas emissions. The new section incorporates the results from the County's Vulnerability Assessment and addresses sea level rise adaptation measures in new development. The following sections discuss how the proposed amendments would not result in cumulative impacts to visual resources, beaches and other coastal resources.

## **A. VISUAL RESOURCES**

The proposed amendments would require new development and substantial redevelopment to be designed for resilience to sea level rise. When a principal structure on a small parcel characteristic of most Residential Beach and Residential Beach Harbor Zones in Existing Communities is substantially redeveloped, design for elevation would be the principal adaptation strategy. The sea level rise adaptation elevation requirements are proposed to be harmonized with existing Federal Emergency Management Agency (FEMA) standards and would require design for either the sea level rise elevation or FEMA standards, and whichever standard would result in more elevation would be applied to the prevailing design (CAP Policy 1.8). As new development occurs, the proposed amendments and existing FEMA standards will change the visual appearance of Existing Communities in the Screening Areas.

Exhibit 17 compares the elevations likely to result from the proposed sea level rise development standards and existing FEMA standards. The existing FEMA regulations were the prevailing factor in determining the base flood elevation in most Existing Communities, and where the proposed sea level rise amendments prevailed, the difference was only about one foot; therefore, the proposed amendments would not result in cumulative impacts to the visual resources of Ventura County. The exhibit includes visual simulations that illustrate the potential for new development to be elevated among limited public viewpoints to the ocean and describes where these elevations are already currently allowed by FEMA standards.

## **B. SHORELINE PROTECTIVE DEVICES**

Shoreline protective devices generally cause harmful impacts to beaches. As new development occurs in Screening Area A, the proposed amendments would require less reliance on shoreline protective devices and result in fewer new and enlarged devices than under current regulations. This would occur in the following ways:

- Siting and design standards would limit shoreline protective devices and caisson development to only principal structures and internal accessory dwelling units (CAP Policy 1.12).
- Siting and design standards would limit new and enlargement of shoreline protective devices after substantial redevelopment occurs because the principal

structure would be designed for resilience without shoreline protective devices, but maintenance would be allowed (CAP Policy 1.13).

- Repair and maintenance activities for shoreline protective devices would not be allowed to move the device further seaward (CAP Policy 1.20).
- During an application for discretionary development along a shoreline with a shoreline protection device, a mean high tideline survey with approval from the State Lands Commission would be required (CAP Policy 1.16) and if necessary the applicant would need to demonstrate an effective lease with the Commission (CAP Policy 1.15).

Shoreline protective devices would continue to be permitted in conformance with Coastal Act Sections 30235 and 30253 (CAP Policy 1.12 and CZO Section 8175-5.12.1.a.). An alternatives analysis would be required to demonstrate that non-structural and hybrid solutions are not feasible (CAP Policy 1.17). When allowed, additional analysis would be required to identify impacts for the life of the principal development that the device would protect. CZO Appendix H-1.4 provides the requirements for the Coastal Hazards Analysis Report, which includes a site-specific evaluation analyzing the existing and future conditions, as well as identification of design features and mitigation measures to avoid or mitigate impacts to coastal resources. Since the proposed amendments would require design of principal structures without reliance on shoreline protective devices, and if any new or shoreline protective device is authorized a site-specific evaluation of the impacts and mitigation at a project level would be required, the proposed amendments would not result in cumulative impacts from shoreline protective devices.

### **C. BEACH NOURISHMENT**

The proposed amendments would expand the definition of “beach area” to include cobble and other unconsolidated materials in addition to sand. This definition more accurately covers a variety of local shoreline conditions that furthers the applicability of analysis of beach impacts (CAP Policy 1.27) and beach nourishment policies. This definition amendment, and policies supporting placement of cobble on beaches where appropriate, will further help prioritize non-structural and hybrid solutions for shoreline protection and encourage sea level rise adaptation through “soft” measures like dune restoration and beach nourishment to protect development from sea level rise. “Soft” measures are preferred over the engineered “hard” structures in CAP Policies 1.17 and 2.5.

CAP Policy 2.2 would support beach nourishment and dune restoration while Policy 2.8 provides design standards for beach replenishment to ensure that the appropriate sediment is deposited. Beach nourishment and dune restoration activities would be evaluated on a project-by-project basis and while there would be temporary impacts from construction activities, beach nourishment would generally conserve the coastline and be used as a short- to mid-range alternative to enhancing shoreline protective devices.

### **D. SAFETY**

The focus of the proposed amendments are policies and standards that would require new development to be designed for resilience to sea level rise and coastal hazards. The proposed amendments in the new “Hazards, Sea Level Rise, and Climate Change” section would limit harm to public health and safety through public notices and real estate disclosures, standards for breakaway structure design, debris retrieval, and reduction of greenhouse gas emissions. This section describes these proposed policies and standards.

### Development Policies and Standards

The 42 development policies (CAP Policies 1.1-1.42) and seven long range policies (CAP Policies 1.43-1.49) under Goal 1 of the CAP are focused on reducing risks to life and property while increasing community, infrastructure, and ecosystem resilience to coastal hazards and sea level rise and. CAP Policies relevant to limiting cumulative impacts are listed below:

- Policy 1.4 outlines the expected life of various types of land uses and prescribes which sea level rise scenario to use for the design.
- Bluff face development would be limited to public access, minimal drainage systems (CAP Policy 1.24).
- New required permit findings in CZO Section 8181-3.5 ensure that the coastal hazards and sea level rise CAP policies are implemented in the Screening Areas.
- An additional permit condition would be added to discretionary permits recording a notice on the property that notifies future property owners about the coastal hazards (CAP Policy 1.34).

### Hazards Disclosures

CAP Policy 1.34 states that new commercial, industrial, and residential development is required to provide a Coastal Hazards Report shall disclose the potential hazards through a notice filed with the Ventura County Recorder’s Office. It would also require disclosures about the potential for flooding during real estate transactions that occur within the Screening Areas.

### Debris Retrieval after a Storm

CAP Policy 1.31 identifies that property owner is responsible for clean up if any part of their development breaks off as debris and falls into the ocean, beach, or on the shore. This policy reduces the likelihood that beach debris after a large storm event would become a public health and safety hazard.

### Accessory Structures

Requirements for accessory structures in CAP Policy 1.7 and related CZO Section 8175-3.6.b. incorporate FEMA guidance on design for when accessory structures should breakaway or else be anchored for public safety. The proposed amendments would not

result in cumulative impacts from accessory structures being developed in the Screening Area A.

#### Uncovered Porches and Decks

Standards for uncovered porches and decks were clarified in the Permitted Uses Table (CZO Section 8174-5) that if the uncovered porch or deck were more than 30 inches above the grade, a discretionary permit would be required to review to ensure it includes hand railings and safe design. CZO Section 8175-4.4 does not allow uncovered porches or decks in the Residential Beach and Residential Beach Harbor zoned properties to extend over a shoreline protective device, into environmentally sensitive habitat area, or obstruct public access.

#### Essential Public Facilities

CAP Policies 1.43 through 1.49 require coastal hazards and sea level rise adaptation planning for essential public facilities and public works projects that includes processes for equitable civic engagement and outreach to designated disadvantaged communities.

#### Reduce Greenhouse Gas Emissions

CAP Policies 3.1 through 3.7 seek to reduce greenhouse gas emissions by requiring sustainable technologies in commercial and industrial development, encouraging electric vehicle infrastructure, and coordination to provide public transit services to the beach.

### **E. CONCLUSION**

Certification of the proposed LCP amendments would not result in cumulative adverse impacts to coastal resources. The purpose and content of the amendments are primarily intended to require the design and siting of new development for safety and to avoid/mitigate adverse impacts on the environment. The new development standards aim to reduce potential impacts to public health and safety from coastal hazards and sea level rise and are expected to result in beneficial cumulative impacts such as community resilience to sea level rise and a reduced dependency on shoreline protective devices as new development occurs.