

**Exhibit 11: Public Comment Letters Regarding the Public Review
Draft Sea Level Rise Adaptation Report**

Engstrom, Aaron

Subject: FW: Public Review Draft Sea Level Rise Adaptation Strategies Report Now Available
Attachments: Surfrider-Ventura-CoastalResilienceComments-03-29-2019.pdf

From: Paul Jenkin <pjenkin@surfrider.org>
Sent: Friday, March 29, 2019 2:21 PM
To: Engstrom, Aaron <Aaron.Engstrom@ventura.org>
Subject: Re: Public Review Draft Sea Level Rise Adaptation Strategies Report Now Available

Hi Aaron,

Attached are some general comments from the Surfrider Foundation on the Adaptaton Strategies report.

Thanks for pursuing advanced planning in preparation for sea level rise. As the report says, "There are few easy solutions and all of them require additional public input and additional funding."

I hope these comments are helpful in moving forward with further planning and implementation.

Paul Jenkin | Ventura Campaign Coordinator | [Surfrider Foundation](#) |
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March 29, 2019

Aaron Engstrom, Project Planner
County of Ventura Resource Management Agency - Planning Division
800 South Victoria Ave
Ventura, CA 93009

RE: **VC Resilient Coastal Adaptation Project Draft Adaptation Strategies Report**

Dear Mr Engstrom,

I attended the Planning Commission hearing and spoke briefly about Surfrider Foundation's history and experience in Ventura County. Surfrider is committed to coastal resilience and the preservation of Ventura County's recreational beaches, and we look forward to participating in future planning on project specific actions.

In general, the Draft Adaptation Strategies Report provides an excellent outline of the threats to the Ventura County coast and strategies for future adaptation to sea level rise. We concur with the approach as outlined in the report, which states:

*Preparation of this Adaptation Report followed the Vulnerability Assessment as the next step in initial adaptation planning. The Vulnerability Assessment is a starting point for a common understanding of the risks, but it does not provide solutions. **There are few easy solutions and all of them require additional public input and additional funding.** As an informational document, this Report expands upon the Vulnerability Assessment to provide a foundation for developing future sea level rise policies to be integrated into the County's Local Coastal Program (LCP). Adaptation planning will remain an iterative process to protect the County's coast as conditions change and new strategies are developed and tested.*

And:

High priorities for the adaptation of County-owned facilities and public assets to be evaluated in the near term include:

- *Sand retention at narrow beaches along the Rincon Parkway and coves with public access such as Mondos, Beacon's Beach, Sycamore Cove, and Yerba Buena;*
- *Dune restoration and drainage improvements at Hollywood Beach;*
- *Accommodation of flooding for inland infrastructure... (at various locations)*

Projects such as those listed above should be carefully planned and implemented to ensure that Ventura County residents and visitors continue to enjoy the benefits of our recreational beaches, a key driver to the local economy.

The Surfrider Foundation has been a leader in advancing progressive coastal and watershed management projects to benefit coastal resources. Specifically, we are active participants in the Surfers' Point Managed Shoreline Retreat project in Ventura and the Matilija Dam Ecosystem Restoration Project. We look forward to applying this demonstrated expertise to working with Ventura County and other agencies to pursue these actions.

In moving forward with an action plan, we would like to emphasize the following recommendations:

* **Coordinate with others:** The County only has jurisdiction over portions of the Ventura County coastline, which due to regional sediment transport along the coast cannot be managed independently. Coastal management is complicated by multiple jurisdictions and competing goals and interests. In this capacity, BEACON works on regional sediment management that affects all jurisdictions and is an important partner in planning and implementation.

* **Managed Retreat:** The Surfers' Point Managed Shoreline Retreat project has become a national example of response to coastal erosion and sea level rise. Managed shoreline retreat should be always be included as one of the adaptation

strategies in the toolbox. This is especially relevant when responding to erosion and loss of public recreational beaches, and may be necessary for other infrastructure in the long term.

* **Restore Watershed Processes:** Many mentioned the need for removal of the obsolete Matilija Dam to restore natural beach sediment supplies. This project is a good example of a watershed restoration approach to coastal management that includes provisions to upgrade outdated infrastructure upstream, including bridges, flood control, and water supply facilities which will ensure resilience to current and future impacts of climate change. Ventura County should prioritize this project in order to ensure community reliance as well as adequate coastal sediment supplies into the future.

* **Engage diverse stakeholders:** Homeowners currently rely upon coastal armoring to protect their property. At the public hearing, homeowners expressed their interest in helping to develop and fund a pilot shoreline protection project as the proposed cobble groin described in the report. Wider beaches would provide greater protection to private properties while helping ensure the persistence of recreational beaches. A multiagency task force that includes diverse stakeholders should be convened to develop and fund these types of projects.

* **Identify Funding:** Climate change will be very costly in coming decades. State and federal funding is available for planning and implementation of adaptation projects, but a local cost match is often required to optimize these opportunities. Ventura County government should identify local funding streams for long term maintenance, monitoring, adaptation, and emergency response to sea level rise.

* **Resolve agency conflicts through Local Coastal Plan update:** Many expressed frustration with the Coastal Commission and a perceived “war against armoring.” In order to reduce future conflicts, Ventura County should update the Local Coastal Plan to identify coastal areas where future armoring will be necessary vs areas where planned retreat and green infrastructure may provide more cost-effective long-term solutions. Developing a common understanding of future expectations and adopting a timeline and triggers for various actions as outlined in the adaptation report is necessary to align permitting processes for coastal development.

* **Identify Triggers:** A strategy such as outlined on the report should be adopted for escalating action levels in response to sea level rise over time. The uncertainties of the timing and magnitude of sea level rise make long term planning difficult, but at some point the threat to lives and property and cost of protection of coastal infrastructure will outweigh the funding available to protect such infrastructure in place.

* **Analyze Extreme Sea Level Rise** - The County should proactively plan for alternatives for critical infrastructure that may be damaged under an extreme sea level rise scenario, known statewide as the H++ scenario. This recommendation comes from the Ocean Protection Council's 2018 report, Rising Seas California: An Update on Sea-Level Rise and was also adopted in the California Coastal Commission's 2018 Sea Level Rise Guidance Science Update.

* **Monitor Changing Conditions:** monitoring of trends over time are needed to quantify the risks to public and private infrastructure and associated costs. Examples of such metrics include, but are not limited to;

- records of incidences of emergencies, road closures, damage, etc
- Flood insurance claims
- Repetitive loss

With the VC Resilient planning process currently underway, Ventura County has an opportunity to become a leader in coastal management by engaging a diverse group of stakeholders and agencies in planning for the inevitable changes with future sea level rise.

Sincerely,



A Paul Jenkin
Ventura Campaign Coordinator - Surfrider Foundation
pjenkin@surfrider.org 805-205-4953

Engstrom, Aaron

From: Dennis Chenoweth <dennis.solimar@gmail.com>
Sent: Tuesday, March 19, 2019 7:24 AM
To: Engstrom, Aaron
Cc: Bill Kearney; Charles Caspary; Bob Holmgren; Kathleen Holmgren; David Lamb; Roger Myers; Al Templeman; Stephen Harbison; Ken High; Janice Thacher; josh@addisonventura.com; wpch3458@aol.com
Subject: Comments on Draft Sea Level Rise Adaptation Strategies Report
Attachments: Feedback from the Coalition to Save the Rincon.docx

Dear Mr. Engstrom:

The Coalition to Save the Rincon is a group composed of representatives from the communities of Solimar Beach Colony, Faria, Seacliff, Mussel Shoals, and Rincon Point. Our goal is to preserve the Rincon Parkway and our communities by developing unified approaches to issues that are common to all of us.

The draft report prepared by the planning department contains many points that are of interest and concern to us. Our comments to this report are concisely summarized in the attached document.

Dennis Chenoweth
President, Solimar Beach Colony HOA

2812 West PCH
Ventura, CA 93001
Phone: 805-653-5258
Email: dennis.solimar@gmail.com

Sent from [Mail](#) for Windows 10

Engstrom, Aaron

From: Dennis Chenoweth <dchenoweth@charter.net>
Sent: Monday, March 18, 2019 11:55 PM
To: Engstrom, Aaron
Cc: Bill Kearney; Charles Caspary; Bob Holmgren; Kathleen Holmgren; David Lamb; Roger Myers; Al Templeman; Stephen Harbison; Ken High; Janice Thacher; josh@addisonventura.com; wpch3458@aol.com
Subject: Feedback on County's Draft Coastal Adaptation Plan
Attachments: Feedback from the Coalition to Save the Rincon.docx

Dear Mr. Engstrom:

The Coalition to Save the Rincon is a group composed of representatives from the communities of Solimar Beach Colony, Faria, Seacliff, Mussel Shoals, and Rincon Point. Our goal is to work closely with the Ventura County Planning Department to provide a unified long-term approach to maintain the integrity of the Rincon Parkway.

We have been meeting recently to discuss the Draft Sea Level Rise Adaptation Strategies Report. Our comments are concisely summarized in the attached document.

One specific measure that we would like to take is to form an *ad hoc* committee so members of our group and members from County planning can work together to develop plans that maintain the integrity and value of the Rincon. If this proposal would be helpful, please let me know.

Sincerely,
Dennis E. Chenoweth
President, Solimar Beach Colony HOA

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Ventura, CA 93001
Phone: 805-653-5258
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Sent from [Mail](#) for Windows 10

Comments to the VC Resilient Coastal Adaptation Project's Draft Sea Level Rise Adaptation Strategies Report

Prepared and Submitted by the Coalition to Save the Rincon

Rincon is that portion of the Ventura County coastline that stretches from Emma Wood State Park to Rincon Point. It is comprised of recreational facilities and the beach-side communities of Solimar Beach Colony, Faria, Seacliff, Mussel Shoals, and Rincon Point. These communities lie between the Pacific Ocean and Pacific Coast Highway (PCH). The Coalition to Save the Rincon was formed by representatives of these communities. The mission of this group is to provide a unified approach to preserve this portion of the County through cooperation with Ventura County officials.

Rincon differs significantly from other parts of the Ventura coast and it is important to recognize these differences when formulating long-term plans for the preservation of this unique area. For example, it is important to note the following:

- The infrastructure beneath PCH consists of an extensive network of electrical, gas, water, sewer, and telecommunication systems that serve as a vital link between Ventura and Santa Barbara Counties. The Union Pacific railroad, which carries both freight and passenger traffic, runs parallel to PCH through this portion of the County. Replacement of this infrastructure in the future will represent a significant cost to the State, the County, public utilities, and Union Pacific Railroad.
- The area currently provides extensive beach access and recreational opportunities for visitors. Faria and Hobson County parks as well as the RV parking along PCH provide a major source of revenue for the County Parks and Recreation Department. Bike lanes and the California Coastal Trail run the length of PCH and are used extensively.
- There are more than 300 homes in the beach communities. The current valuation of these properties approaches one billion dollars and the County collects tens of millions of dollars of taxes from these home owners. If active measures are not taken to preserve these homes, County tax revenues will be significantly reduced in the future.
- For more than 100 years, the ranches and communities of Solimar, Faria, and Seacliff have served as a critical buffer to protect PCH from erosion. They have accomplished this by the construction of revetments and sea walls that preserve their property. Maintenance and repair of these critical structures is now imperiled by the implementation of a policy of managed retreat.

While the VC Resilient Coastal Adaptation Project's Draft Sea Level Rise Adaptation Strategies Report does discuss several alternative approaches for dealing with sea level rise, it concludes that adaptation of the California Coastal Commission's policies for managed retreat seem to be preferred. In the case of the Rincon, this seems particularly short sighted for the following reasons:

- Because estimates of the rate of sea level rise vary significantly, it is important to develop flexible plans that can be phased in as sea levels gradually change. These plans should be

designed to preserve the Rincon for as long as possible. In many areas, PCH and the Union Pacific railroad are only tens of feet from the ocean to the West and are bounded on the East by the cliffs created during construction of Highway 101. There is no area for managed retreat. CalTrans has recognized this fact and has recently constructed a reinforced sea wall to protect PCH between Emma Wood State Park and Solimar.

- All Rincon homeowners are willing to bear the costs of maintaining the sea walls and revetments that currently protect their property and PCH. Therefore, this alternative to managed retreat is available at no cost to taxpayers if the Coastal Commission will approve the permits that are required.
- The draft report mentions several alternatives to managed retreat. Residents of the Rincon communities are supportive of hybrid approaches and are willing to explore them in cooperation with the County.
- Residents of Seacliff have recently obtained a ruling that their sea wall serves to protect PCH. This is an important precedent that is supported by the Solimar Beach Colony and Faria Home Owners Associations.

The Rincon is an extremely unique area of the Ventura County coastline that provides important infrastructure connections between Santa Barbara and Ventura Counties, affords all County residents with recreational activities, and serves as home for more than 300 families. For these reasons, it is important to consider alternatives to managed retreat to protect and preserve this area. Members of the Coalition to Save the Rincon suggest the following actions:

- Form an *ad hoc* committee composed of Coalition members and members of the County Planning Department. The purpose of the group would be to work together to develop imaginative flexible plans that incorporate alternatives to managed retreat. Because Rincon differs significantly from other areas on the California coast, the one-size-fits-all approach being recommended by the California Coastal Commission is not consistent with the needs of the County or the Rincon residents.
- Define the most cost-effective means of dealing with sea level rise in this specific area. This should be done by developing objective financial information that can be used by this *ad hoc* committee to guide sound policy decisions. For example, it would be very helpful to perform a financial analysis that examines the cost of replacing the existing Rincon infrastructure, including the Union Pacific railroad, while simultaneously losing income from property taxes and recreational fees if managed retreat is implemented. Compare these costs to those that would be incurred by having individual home owners maintain their sea walls at their own expense.
- The existing sea walls form an integrated barrier that protects PCH. Failure to maintain any one section of the revetment or sea wall would result in failure of the entire structure. The Coalition members ask the County to join with them and support their requests to obtain the California Coastal Commission permits that are required to maintain and replace portions of the existing structures.

We appreciate having this opportunity to provide input into the County planning process. Going forward, we are most interested in working together with planners to develop imaginative solutions that will preserve the Rincon for its residents and all people who utilize its extensive recreational activities.

Coalition to Save the Rincon

Solimar Beach Colony Representatives

Dennis Chenoweth

Bill Kearney

Charles Caspary

Kathleen Holmgren

Bob Holmgren

Faria Representatives

Roger Myers

David Lamb

Steve Andruszkewicz

Josh Addison

Seacliff Representatives

Al Templeman

Stephen Harbison

Mussel Shoals Representative

Ken High

Rincon Point Representative

Janice Thacher

Charles Caspary
P.O. Box 8625
Calabasas, CA 91372
818-384-4074

March 17, 2019

Attn: Aaron Engstrom – Senior Planner
County of Ventura

Re: PL17-0147 Comments on the Draft Adaptation Strategies Report

Dear Mr. Engstrom,

I appreciate the opportunity to provide written comments in addition to those comments I made at the March 5th workshop.

As a property owner on the North Coast, I appreciate the serious issues of sea level rise impacts. On the whole, I support the draft. I have made some specific recommendations in this comment letter.

I believe that some issues raised by the Planning Commissioners during the workshop deserve inclusion in the version that will go the Supervisors. Those include:

- Commissioners suggested the creation of a County department or office that is charged with promoting and coordinating beach replenishment projects.
- The County should promote partnerships with local Home Owners Associations to test and implement adaptation strategies. Substantial support for these partnerships was evidenced in testimony by members of the public (and HOA Board members)
- The report should include recognition of contributions and investments by North Coast HOAs in protecting public infrastructure (Old Rincon Highway, etc.) with privately funded seawalls

How does staff propose to incorporate the suggestions of the Commissioners ?
Why is this report not returning to the Planning Commission for approval??

Some information was presented by staff / consultant during the workshop that is important, but I do not find in the draft. For example:

1. In response to a Commissioner's question, Dr. Revell stated that “ in this area, the tidal gauge at Santa Monica has the oldest historical data for sea level rise. This data records a rate of sea level rise of 1.5 millimeters per year.”

At this rate, the sea will rise about 2 inches by the year 2053 (a LONG way from 8”, or 16” much less a whopping 58”. Models projecting certain rates of SLR should at least be contrasted with ACTUAL FACTUAL measurements. **Please include and reference actual recorded SLR data from this gauge when discussing projections of sea level rise.**

Charles Caspary
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818-384-4074

Re: Comments on the Draft Adaptation Strategies Report

2. The March 5th workshop included a Power Point slide prepared by staff that referred to managed retreat as “*only intended for public property” (or similar language).

Please include this slide as it is a clear statement of intent as to the County’s intended limitations of “managed retreat”

Excerpt, Section 3.2 , Page 47

past, present, and future, particularly with sea level rise. A local example of an organization that works toward the development of collectively beneficial adaptation strategies for the entire region is the Beach Erosion Authority for Clean Oceans and Nourishment (BEACON). This organization is a proponent for regional sediment management that would reduce the cumulative effects of erosion on all beaches between Point Conception (north of Santa Barbara) and Point Mugu. They partnered with local agencies and the Surfrider Foundation to complete the innovative Surfer’s Point Managed Retreat project in the City of Ventura. This project is frequently referenced as one of the premier examples of nature-based adaptation in California.

The draft makes no mention that Phase 2 of this “premier example of nature based adaptation” will sacrifice portions of the County Fairgrounds, the public street and parking lots, the sewer pump station and sewer force mains. These facilities will need to be relocated multiple times as nature- based erosion proceeds. The cost vs. benefit analysis must be updated and included. No mention is given to the possibility (probability?) that the eventual abandonment of the fairgrounds to the ocean will be required.

The frequent reference to the project as a “premier example” is not only a misuse of the word premier, but is also nothing but an unsupported opinion and should be deleted. I suggest that references to this project in the text should include “The longevity and effectiveness of this managed retreat project has yet to be proven”

Charles Caspary
P.O. Box 8625
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Excerpt Sections on armoring:

Between 2030 and 2060: Develop more sophisticated beach nourishment programs that source sediment from local bluffs and watersheds. Coordinate with the Union Pacific rail line and Caltrans to transport sediment from watershed debris basins or the sand-rich Central Coast for deposition on public beaches and rock revetments during spring and summer months. Install permanent rock groins if cobble-based groins underperform. Plan alternatives to rock revetments, such as curved seawalls that have smaller structural footprints.

- Between 16" and 5' of sea level rise. Public agencies that maintain public beaches should consider alternatives to rock revetments along thinning beaches, as the footprint of such structures can consume large areas of sandy beach that could otherwise be used for recreation and habitat. For example, Figure 3-9 below shows a segment of the Rincon Parkway that includes both a seawall and rock revetments. In the aerial image on the right of Figure 3-9, the same amount of space that the revetment occupies is used for camping and parking at the adjacent location where there is a vertical seawall. If all of the RV camping areas were lined with vertical seawalls instead of revetments, about 145,000 square feet of space could be used for 160 additional RV camping sites or for other amenities such as Coastal Trail improvements.³⁷ A smaller footprint for shoreline armor would also leave space for sand and beach wrack that benefits shorebirds and spawning grunion. Hobson County Park is projected to be the first revetment that protects a park on the North Coast to be inundated by rising tides (see Figure 2-3). This site could become a pilot project for adaptation

The calculation to reach 160 RV spaces estimated that the revetments occupy 14,500 sq ft of space per every 0.10 miles of length on the Rincon Parkway. The Parkway is about 1 mile long, and each designated space is about 900 sq.

County of Ventura
Resilient Coastal Adaptation Project

3-42

February 25, 2019
Draft Adaptation Strategies Report

Alternatives to rock revetments are problematic

There is little doubt you can cram more campers into a given stretch of roadway with a reduced footprint, if that is what you want. The tradeoffs may not be acceptable.

There is increased reflected wave energy from seawalls (curved or not) that increases beach scour as contrasted with a wave energy attenuating rock revetment. Stand and watch the waves striking both and you can see the difference.

See attached photos taken March 16th of the "new" seawall at Emma Wood (constructed several years ago at a cost of \$11,000.00 per linear foot) Note the increased width of dry sand in front of the rock revetment vs. the new curved seawall.

Please call if any clarification is required.

Sincerely,

Charles Caspary via email
Cc: Coalition to Save the Rincon

Charles Caspary
P.O. Box 8625
Calabasas, CA 91372
818-384-4074



Looking East towards Ventura



Looking West towards Santa Barbara

Engstrom, Aaron

Subject: FW: Public Review Draft Sea Level Rise Adaptation Strategies Report Now Available

From: Debra Barringer <dbarringer98@hotmail.com>

Sent: Thursday, February 28, 2019 1:23 PM

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

Subject: Re: Public Review Draft Sea Level Rise Adaptation Strategies Report Now Available

Thanks. A quick comment would be to seriously reconsider the photo on the cover of this report. That is the invasive, nonnative beachgrass that the County and other entities will hopefully eradicate within a few years. A better photo would include the blooming sensitive red sand verbena or other native dune plants. I don't have a nice camera but will attach an example.

Best regards,
Debra Barringer

Sent from [Outlook](#)

Engstrom, Aaron

From: Stephen Andruszkewicz <wpch3458@aol.com>
Sent: Monday, March 11, 2019 10:36 AM
To: Engstrom, Aaron
Subject: Private Access to Faria Beach

Good morning Aaron,

Just a note to follow up on my offer for you to have access to the central portion of the eastern third of the Faria Beach Colony via our private stairway to the sand at 3458 PCH in order to study/observe our beach area regarding the VC Resilient Coastal Adaptation Project.

Just give me a call at my mobile# 818-652-9942 to make an appointment.



Respectfully,
Stephen Andruszkewicz