



City of Santa Barbara California

PLANNING COMMISSION STAFF REPORT

REPORT DATE: March 28, 2024
AGENDA DATE: April 4, 2024
PROJECT ADDRESS: 105 Harbor Way (PLN2023-00338)
 Rock Revetment Project
TO: Planning Commission
FROM: Planning Division
 Megan Arciniega, Senior Planner
 Kathleen Kennedy, Project Planner

I. PROJECT DESCRIPTION

In early January 2023, the City of Santa Barbara was battered by a significant storm event and strong storm surges along the coast. Protective sand berms on Leadbetter Beach were quickly eroded as high tides flooded the City's harbor commercial area. The area, which includes a paved parking lot, public road, boat yard, and harbor maintenance yard, saw the loss of a portion of the parking lot and security fencing. A State of Emergency was declared on both the State and Federal level due to the potential for substantial damage and loss of property.

The City's Waterfront Department was granted an Emergency Coastal Development Permit (Emergency CDP) by the California Coastal Commission (Coastal Commission) on January 11, 2023 for the construction of a 360 lineal foot rock revetment along the beach between the Santa Barbara Yacht Club and the Harbor West parking lot. Approximately 3,523 tons of granite boulders were used to create a 15-foot high and 36-foot wide revetment that is partially buried. It was installed adjacent to the west end of an existing 15-foot high rock revetment. The emergency work was completed on January 27, 2023. Subsequently, the Waterfront Department completed like-for-like repairs of 6,320 square feet of pavement, 375 linear feet of chain-link fencing, pedestrian gate, rolling gate, and privacy/wind screen damaged in the boatyard and maintenance yard under a building permit issued by the City.

Although an Emergency CDP was granted for the revetment work, the project now requires a formal Coastal Development Permits (CDPs) from both the Coastal Commission and the City for all work completed in response to the storm event. Processing of the City's CDP is discussed further in section IV below. In addition, see Exhibits A and B for project plans and applicant letter, respectively.

II. REQUIRED APPLICATION

The discretionary application required at this hearing under the purview of the Planning Commission is: a recommendation from the Planning Commission to allow the project to proceed to the California Coastal Commission for a Consolidated Coastal Development Permit (Consolidated CDP) for the proposed development that is located in both the Appealable

Jurisdiction of the City's Coastal Zone and the California Coastal Commission Permit Jurisdiction (SBMC §28.44.060 and California Coastal Act Section 30601.3).

APPLICATION DEEMED COMPLETE: January 10, 2024.

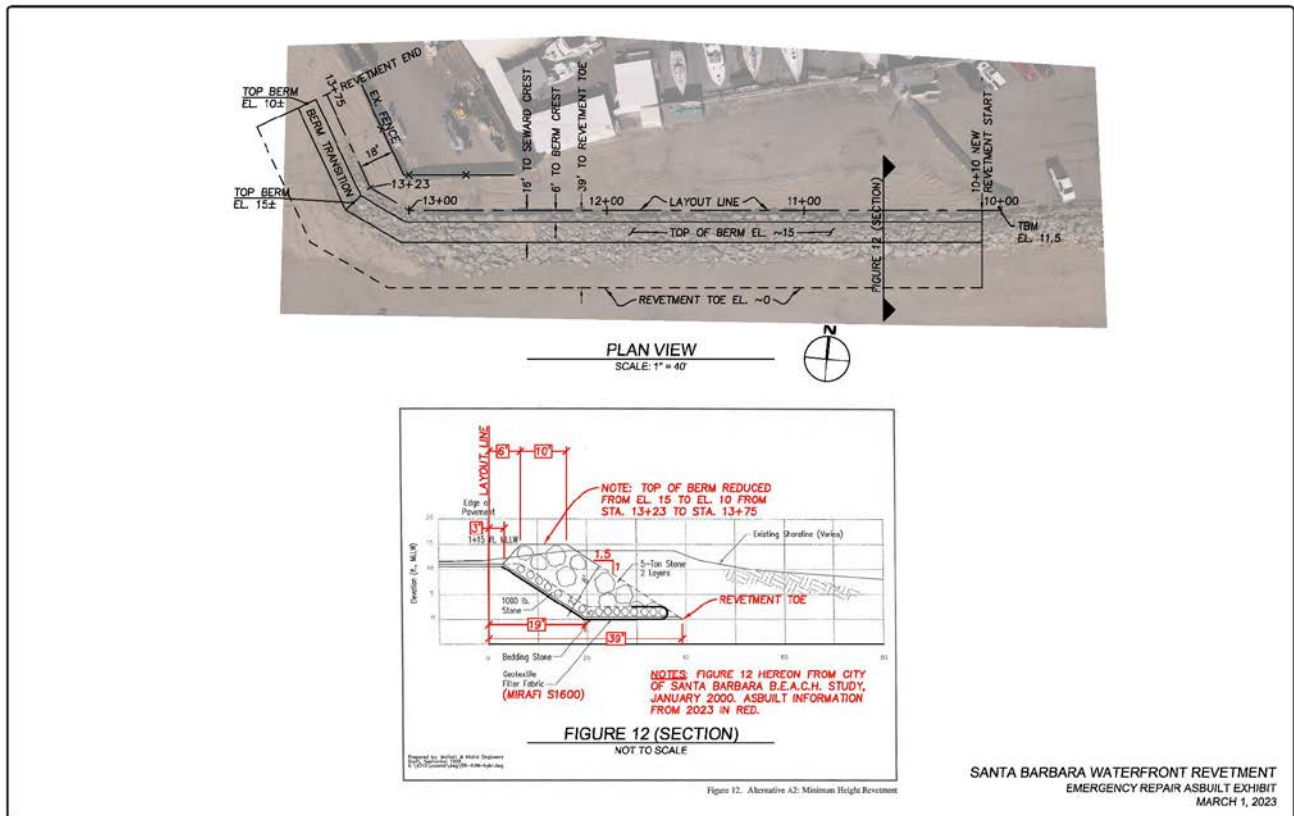
DATE ACTION REQUIRED: April 9, 2024

III. **RECOMMENDATION**

Staff recommends that the Planning Commission allow the project to proceed to the Coastal Commission for a Consolidated CDP because the project would be consistent with the policies of the City's Coastal Land Use Plan (Coastal LUP) and the California Coastal Act.



Vicinity Map for Project Site



Rock Revetment Details

IV. BACKGROUND

The Coastal Act creates a unique partnership between the state (acting through the Coastal Commission) and local governments to manage shoreline public access, recreation, terrestrial and marine habitats, views of the coast and scenic coastal areas, agricultural lands, and other resources by regulating proposed development within the Coastal Zone through its comprehensive planning and regulatory program.

The review authority for new development in most areas of the Coastal Zone is transferred from the Coastal Commission to the local jurisdiction. The standard of review for new development is the Local Coastal Program (Coastal LUP and Coastal Implementation Plan). However, the Coastal Commission retains sole permitting authority in specific geographic areas. The standard of review for issuance of a CDP in the Coastal Commission's retained jurisdiction is Public Resources Code Chapter 3 of the Coastal Act (Coastal Resources Planning and Management Policies).

According to the City's Coastal LUP Post-Certification Jurisdiction Map, the project area is likely located on the dividing line between the City's CDP jurisdiction and the Coastal Commission's retained jurisdiction area.

Rather than obtain a CDP from both the City and the Coastal Commission, City staff proposes to apply for a Consolidated CDP from the Coastal Commission to expedite review and permitting, which is allowed under Coastal Act (Public Resources Code) Section 30601.3.

Coastal Act (Public Resources Code) Section 30601.3 (Coastal Development Permit Application; processing criteria; standard of review; application fee; adoptions of guidelines) states, in part:

(a) ...the commission may process and act upon a consolidated coastal development permit application if both of the following criteria are satisfied:

(1) A proposed project requires a coastal development permit from both a local government with a certified local coastal program and the commission.

(2) The applicant, the appropriate local government, and the commission, which may agree through its executive director, consent to consolidate the permit action, provided that public participation is not substantially impaired by that review consolidation.

(b) The standard of review for a consolidated coastal development permit application submitted pursuant to subdivision (a) shall follow Chapter 3 (commencing with Section 30200), with the appropriate local coastal program used as guidance.

The proposed project satisfies the criteria for a Consolidated CDP at the Coastal Commission because a portion of the project area is located in the Appealable Jurisdiction of the City's Coastal Zone and requires a CDP pursuant to the City's Certified Local Coastal Program, and a portion of the project area is located in the Coastal Commission Permit Jurisdiction and requires a CDP from the Coastal Commission. In addition, correspondence between staff of the Public Works Department and the Coastal Commission indicates that the Coastal Commission is in support of a Consolidated CDP process for the proposed project. Also, public participation is not impaired because the Planning Commission conducts noticed public hearings, which provide the public with opportunities to review the project and submit comments for consideration.

V. SITE INFORMATION

Applicant:	Public Works Department	
Property Owner:	City of Santa Barbara, Waterfront Department	
Site Information		
Parcel Number:	045-250-013	Lot Area: 8.82 acres
Coastal Land Use Plan:	Harbor-Stearns Wharf	Zoning: H-C/SD-3 (Harbor-Commercial/Coastal Overlay)
Existing Use:	Beach, Boat Yard, Parking Lot	Topography: 6% slope
Adjacent Zoning and Land Uses		
North:	H-C/ SD-3	Boat Yard, Parking Lot
East:	H-C/SD-3	Beach, Parking Lot
South:	H-C/SD-3	Beach
West:	P-R/SD-3	Beach, Parking Lot

VI. POLICY AND ZONING CONSISTENCY ANALYSIS

A. ZONING ORDINANCE CONSISTENCY

The project area is located on the portion of the City-owned parcel that has a zoning designation of H-C/SD-3 (Harbor Commercial/ Coastal Overlay). The existing uses (boat yard, storage and maintenance yard, parking lot) are allowed uses in this harbor and shoreline area. No changes are proposed with the project; therefore, the uses will remain consistent with the zoning ordinance.

B. CALIFORNIA COASTAL ACT AND COASTAL LAND USE PLAN CONSISTENCY

Within the City's permit jurisdiction, projects located in the Coastal Zone must be found consistent with the California Coastal Act and the City's Coastal LUP, which implements the California Coastal Act. As noted previously, the standard of review for a Consolidated CDP is the Coastal Act, with guidance from the City's Coastal LUP. Many of the applicable policies are addressed below, however, a complete list of applicable policies is provided as Exhibit C.

1. CALIFORNIA COASTAL ACT

There are Coastal Act policies that are applicable to the project that address public access, protection of fishing and boating facilities, and protection of environmentally sensitive habitat areas.

The project is consistent with Section 30211 (Development not to interfere with access), Section 30252 (Maintenance and enhancement of public access), and Section 30234 (Commercial fishing and recreational boating facilities) because the revetment would protect public parking areas and the boat yard and harbor maintenance yard.

There are also policies that address shoreline protection devices and coastal hazards.

The project is consistent with Section 30235 (Construction altering natural shoreline) and Section 30253 (Minimization of adverse impacts) because the revetment would protect existing public facilities from the effects of coastal flooding and erosion.

2. COASTAL LAND USE PLAN POLICIES

The project site is in the Waterfront Beaches/ Harbor Component Area of the City's Coastal LUP. This Component Area encompasses the land area south of Cabrillo Boulevard to the Pacific Ocean, including Stearns Wharf and the Harbor facilities, stretching from the westerly end of Leadbetter Beach to the easterly end of East Beach. It includes three miles of sandy beaches. All of the land in this Component Area is publicly owned. The Harbor area and Stearns Wharf have a unique land use designation that strives to assure the Harbor remains primarily a working harbor with visitor-serving and coastal-related uses secondary to coastal-dependent uses.

This is the area most vulnerable to the impacts of coastal flooding and beach erosion, intensified by sea level rise. Shoreline protection features, water control structures, and

sediment management practices (i.e., regular beach nourishment from Harbor dredging) are already in place due to the long history of erosion and flooding.

Land Use and Development, Coastal-Dependent Development, and Public Access. There are Coastal LUP policies applicable to the proposed project that address land use and development, coastal-dependent development, and public access.

The project is consistent with Coastal LUP Policy 2.2-1 (Harbor Development), Policy 2.2-2 (Harbor Operations), Policy 2.2-3 (Harbor Support Uses), and Policy 2.2-15 (Dry Boat Storage) because the construction of the rock revetment would protect these important uses.

The project is consistent with Coastal LUP Policy 3.1-2 (Lateral Access Along the Coast) because the project does not interfere with the public's right to access along the coast. The project is consistent with Coastal LUP Policy 3.1-15 (Coastal Access Parking), Policy 3.1-21 (Public Access and Development), and Policy 3.1-30 (Preserve Existing Key Public Access Parking) because the rock revetment would protect the parking lots that provide access to the coast, and the project includes the repair of the public parking lot.

Biological Resources, and Scenic Resources and Visual Quality. There are Coastal LUP policies applicable to the proposed project that address biological resources, scenic resources and visual quality.

The project is consistent with Coastal LUP Policy 4.1-32 (Beach Grooming and Disturbance of Wrack) and Policy 4.1-33 (Avoidance of Sensitive Species on Beaches) because the project avoided the disturbance of seaweed, vegetation, and sensitive species during construction, as described in the Biological Assessment Report (Rincon Consultants, April 2023) prepared for the project.

The project is consistent with Coastal LUP Policy 4.3-9 (Minimize Excavation, Grading and Earthwork) and Policy 4.3-19 (Sea Walls, Other Protection Devices, and Fences on Beaches and Coastal Bluffs) because the amount of grading was reduced to the minimum amount feasible, and the rock revetment was designed to preserve the natural and scenic quality of area.

Coastal Hazards. There are Coastal LUP policies applicable to the proposed project that address coastal hazards.

According to Coastal Policy 5.1-29 (Interim Shoreline Hazards Screening Areas Map), the project site is in Potential Shoreline Hazards Screening Area 1 (City-Owned Low-Lying Beach and Backshore Areas) and Area 5 (Stearns Wharf and Harbor).

The design of a revetment was based on a design studied and recommended, but not yet implemented, from the B.E.A.C.H. Study (Beach Erosion And Land Use Alternatives Control At The Harbor), Santa Barbara Harbor Shoreline Protection and Land Use Alternatives Study (URS Greiner Woodward Clyde, Civitas Urban Design, and Moffat & Nichol Engineers, January 2000). The study notes that a rock revetment is the most common type of structure used for shore protection in Southern California. Rock revetments are relatively easy to maintain and are typically the least expensive form of permanent shore protection. Two sizes of revetments were described in the report. The minimum height (15 foot) alternative was chosen.

A Wave Uprush Study and a Hazard Mitigation Plan were prepared for the project to address coastal flood hazards.

Wave Uprush Study (Moffatt & Nichol, April 24, 2023). The study is a wave uprush assessment of the emergency rock revetment shore protection as constructed in January 2023.

Hazard Mitigation Plan (Moffatt & Nichol, November 10, 2023). The report expanded upon the results presented in the Wave Uprush Study to a) evaluate coastal hazards at the project site, b) conduct an engineer's analysis of the structural adequacy of the revetment, c) suggest and review project alternatives, and d) provide a hazard mitigation plan to offset potential impacts, using LUP policies as guidance.

Three alternatives, including the existing conditions, were assessed as part of the study. It was determined that when compared to the "No Action" Alternative, the proposed project (Alternative 1) and proposed project with periodic beach nourishment (Alternative 3) provide significant protection to landward property with little to no negative impact on coastal resources. The revetment will minimize risks to life and property; assure stability and structural integrity; and neither create nor contribute significantly to erosion, geologic instability, or destruction of the site or surrounding area, during its expected life, factoring in the effects of sea level rise.

Based on the conclusions of the reports, the project is consistent with the following coastal hazard policies: Coastal LUP Policy 5.1-18 (Hazard Risk Reduction), Policy 5.1-19 (Adaptation in Development), Policy 5.1-28 (Minimize the Effects of High Flood Hazard), Policy 5.1-30 (Development Standards for Potential Shoreline Hazards Screening Area 1 (City-Owned Low-Lying Beach and Backshore Areas), Policy 5.1-34 (Development Standards for Potential Shoreline Hazards Screening Area 5, Stearns Wharf and Harbor), Policy 5.1-44 (Shoreline Protection Device Permitting), Policy 5.1-63 (Shoreline Hazard Evaluations), and Policy 5.1-72 (Shoreline Protection Device Evaluation Requirements).

Based on the policy discussion above, the project is consistent with the Coastal Act and the Coastal LUP.

VII. ENVIRONMENTAL REVIEW

The rock revetment project completed in January 2023 under the Emergency CDP was determined to be exempt from the California Environmental Quality Act (CEQA) under Guidelines Section 15269, Statutory Emergency Project Exemption. The subsequent repairs in the boatyard and maintenance yard were determined to be exempt from the CEQA under Guidelines Section 15301, Existing Facilities. No new physical construction has occurred.

Therefore, staff has determined that the project qualifies for an exemption from further environmental review under CEQA Guidelines Section 15301 (Existing Facilities), which allows for repair, maintenance, or minor alteration of existing public structures, involving negligible or no expansion of existing or former use. None of the exceptions to the use of Categorical Exemptions per Guidelines §15300.2 apply.

The following reports were reviewed by staff to make the environmental determination:

- Biological Assessment (Rincon Consultants, April 2023)

- Cultural Resources Report (Dudek, April 24, 2023)

VIII. DESIGN REVIEW

Although review by the Architectural Board of Review is generally required for alterations to City-owned property, the repair and replacement of the parking lot and fencing does not require design review because the improvements are consistent with the existing design review approvals.

IX. NEXT STEPS

If authorized by the Planning Commission, Public Works and Waterfront Department staff will submit an application to the California Coastal Commission for a Consolidated CDP for the project.

Exhibits:

- A. Project Plans and Photographs
- B. Applicant's Letter, dated August 11, 2023
- C. Applicable Coastal Act and Coastal LUP Policies

Contact/Case Planner: Kathleen A. Kennedy, Project Planner
(KKennedy@SantaBarbaraCA.gov)
630 Garden Street, Santa Barbara, CA 93101
Phone: (805) 564-5470 x4560.



City of Santa Barbara California

Exhibit A: Project Plans Dated for the April 4, 2024 Planning Commission Meeting, are available electronically for view online at: SantaBarbaraCA.gov/PC and will be transferred the city's [Archived Agendas & Documents system](#) after the hearing.



City of Santa Barbara

Public Works Department

SantaBarbaraCA.gov

August 14, 2023

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Planning Commission
City of Santa Barbara
630 Garden Street
Santa Barbara, CA 93101

SUBJECT: Submittal of Coastal Development Permit Consolidation Request – Rock Revetment Project

Dear Planning Commission:

The City of Santa Barbara (City) Public Works Department is pleased to submit a Coastal Development Permit application for the Rock Revetment Project (Project) as a consolidated permit with the California Coastal Commission (CCC) pursuant to California Public Resource Code Section 30601, for Planning Commission review and consideration.

Background and Purpose

In early January 2023, the City experienced severe storms, including intense rainfall, significant flooding, and historic ocean swell. The storms battered the coast, which caused significant damage and coastal erosion in a short period. The Waterfront area was one of the hardest hit areas. Waves quickly eroded the seasonal sand berms that were permitted under the City's Sediment Management Plan (CCC Coastal Development Permit [CDP] 4-21-0103), and inundated the Harbor Commercial Area, damaged infrastructure, and flooded roadways and businesses.

In response, the Waterfront Department (Department) constructed a 360-foot-long rock revetment that tied into and extended an existing rock revetment that protected the eastern side of the Harbor Commercial Area. In January 2000, URS Greiner Woodward Clyde, Civitas Urban Design, and Moffat & Nichol Engineers completed *Santa Barbara Harbor Shoreline Protection and Land Use Alternatives Study* (Study) that looked at ways protect the City's Waterfront and Harbor Commercial Areas from storms. The Study analyzed the environmental and economic impacts of several alternatives, including extending the existing revetment thousands of feet into Leadbetter Beach, or putting a new revetment along the entire Harbor Commercial Area seaward of the existing revetment. The Study's final recommendation was to pursue a relatively modest 360-foot westward expansion of the existing revetment as the best approach to balance the need to protect important coastal-dependent uses in the Harbor Commercial Area and avoid impacts to beaches, sand supplies, and public access.

Under the Emergency CCC CDP G-4-23-0005 and the US Army Corps of Engineers Regional General Permit (RGP) 63 SPL-2023-00038-CLH, the City constructed a rock revetment per the recommended specifications. Construction of the rock revetment began on January 12, 2023 and was completed on January 27, 2023. The rock revetment protects the City's Harbor Commercial Area infrastructure, boatyard, public roads, and businesses from wave action, storm surge, erosion, and flooding. It is key in protecting the commercial and recreational boating opportunities and visitor services.

The Department also completed like-for-like repair of 6,320 square feet of pavement, 375 linear feet of chain-link fencing, a pedestrian gate, rolling gate, and privacy/wind screen damaged by the storm in the Waterfront boatyard and maintenance yard as part of the Project. These repairs have restored nine damaged parking spaces and nine additional spaces that were closed due to safety and security, and restored the ability to secure the lots.

Consolidation of Permit Actions Requested

According to the City's Local Coastal Plan Post-Certification Jurisdiction Map, the Project is likely located on the dividing line between the City's CDP jurisdiction and the CCC's retained jurisdiction area. Severe erosion modified the high tide location prior to the Project; therefore, the exact boundary line between two jurisdictions could not be determined at the time of the emergency construction.

On May 1, 2023, the Department applied for a CDP (CDP 4-23-0406) with the CCC to retain the revetment. The CCC issued an Incomplete Letter on June 13, 2023, requiring a written request to consolidate CDP actions from the City.

Given the likelihood that the Project bisects the CDP's jurisdiction boundary line, staff believes a consolidated permit action is appropriate, which will streamline permitting and facilitate a complete and thorough environmental review of the Project.

Coastal Context

The City understands the importance of proper coastal management, the balance needed between keeping beaches healthy and providing accessible recreational and visitor service facilities, and the negative impacts of haphazard or substandard coastal structures. The City has a long history of working with the CCC on coastal projects, including the City's ongoing Sediment Management Plan, the annual maintenance dredging of the Harbor, restoration projects at the Andree Clark Bird Refuge and East Beach, the 2019 certification of a new Coastal Land Use Plan, and the 2021 completion of the City's first Sea-Level Rise Adaptation Plan.

The 2021 Sea-Level Rise Adaptation Plan identifies the Harbor and the Harbor Commercial Area as some of the highest priority areas for protection in order to adapt to the changes that sea-level rise will bring to the coastal access, visitor service, emergency response, and recreational and commercial fishing opportunities that this area provides. The revetment is one of many adaptation phases for the Harbor area over time as sea levels rise and storm damages become more severe. To that end, the CCC has funded grant applications for two projects along the Waterfront:

- A Wastewater and Water Systems Adaptation Project to relocate or otherwise floodproof sewer mains and other co-located infrastructure under the beach area; and
- a 30-year Waterfront Adaptation Plan to assist the City with adapting to the effects of sea-level rise and major storms in the next 30 years.

Among other options, the Waterfront Adaptation Plan will look at specific projects and action triggers, including how the City could modify the beach bike path over time to enhance public access and the beach area, and the feasibility of additional sediment management and/or dune formation along the Waterfront.

The Department requests your support to approve consolidated permitting with CCC to retain the rock revetment at the Harbor Commercial Area so it can continue to provide safe and accessible coastal services for the Harbor's businesses and the public.

Sincerely,



Beth Anna Cornett
Senior Planner

BAC/sk

CC: Elias Isaacson, Community Development Director
Clifford M. Mauer, P.E., Public Works Director
Brian D'Amour, P.E., City Engineer
Mike Wiltshire, Waterfront Director *MW*
Brian Adair, Waterfront Facilities Manager *BA*
Allison DeBusk, City Planner

Applicable Coastal Act and Coastal Land Use Plan Policies
Rock Revetment Project
105 Harbor Way

Coastal Act Policies

Section 30211. Development not to interfere with access. Development shall not interfere with the public's right of access to the sea where acquired through use or legislative authorization, including, but not limited to, the use of dry sand and rocky coastal beaches to the first line of terrestrial vegetation.

Section 30234. Commercial fishing and recreational boating facilities. Facilities serving the commercial fishing and recreational boating industries shall be protected and, where feasible, upgraded. Existing commercial fishing and recreational boating harbor space shall not be reduced unless the demand for those facilities no longer exists or adequate substitute space has been provided. Proposed recreational boating facilities shall, where feasible, be designed and located in such a fashion as not to interfere with the needs of the commercial fishing industry

Section 30235. Construction altering natural shoreline. 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. Existing marine structures causing water stagnation contributing to pollution problems and fishkills should be phased out or upgraded where feasible.

Section 30240. Environmentally sensitive habitat areas; adjacent developments. (a) Environmentally sensitive habitat areas shall be protected against any significant disruption of habitat values, and only uses dependent on those resources shall be allowed within those areas. (b) Development in areas adjacent to environmentally sensitive habitat areas and parks and recreation areas shall be sited and designed to prevent impacts which would significantly degrade those areas, and shall be compatible with the continuance of those habitat and recreation areas.

Section 30252. Maintenance and enhancement of public access. The location and amount of new development should maintain and enhance public access to the coast by (1) facilitating the provision or extension of transit service, (2) providing commercial facilities within or adjoining residential development or in other areas that will minimize the use of coastal access roads, (3) providing nonautomobile circulation within the development, (4) providing adequate parking facilities or providing substitute means of serving the development with public transportation, (5) assuring the potential for public transit for high intensity uses such as high-rise office buildings, and by (6) assuring that the recreational needs of new residents will not overload nearby coastal recreation areas by correlating the amount of development with local park acquisition and development plans with the provision of onsite recreational facilities to serve the new development.

Section 30253. Minimization of adverse impacts. New development shall do all of the following: (a) Minimize risks to life and property in areas of high geologic, flood, and fire hazard. (b) Assure stability and structural integrity, and neither create nor contribute significantly to erosion, geologic instability, or destruction of the site or surrounding area or in any way require the construction of protective devices that would substantially alter natural landforms along bluffs and cliffs. (c) Be consistent with requirements imposed by an air pollution control district or the State Air Resources Board as to each particular development. (d) Minimize energy consumption and vehicle miles traveled. (e) Where appropriate, protect special communities and neighborhoods that, because of their unique characteristics, are popular visitor destination points for recreational uses.

Coastal Land Use Plan Policies

LAND USE & DEVELOPMENT POLICIES

CITY PLANNING EFFORTS & PROGRAMS

Policy 2.1-15 Maintenance and Enhancement of Public Access. As outlined in Coastal Act Section 30252, the location and amount of new development or substantial redevelopment should maintain and enhance public access to the coast by (1) facilitating the provision or extension of transit service, (2) providing commercial facilities within or adjoining residential development or in other areas that will minimize the use of coastal access roads, (3) providing non-automobile circulation within the development, (4) providing adequate parking facilities or providing substitute means of serving the development with public transportation, (5) assuring the potential for public transit for high intensity uses, and (6) assuring that the recreational needs of new residents will not overload nearby coastal recreation areas by correlating the amount of development with local park acquisition and development plans with the provision of onsite recreational facilities to serve the new development.

DEFINITIONS & PROCEDURES

Policy 2.1-25 Repair and Maintenance. Repair and maintenance activities are those actions that preserve a development in its permitted configuration and condition. This includes routine actions typically associated with keeping such development in good condition to prevent its deterioration as well as targeted corrective actions to restore the development to a working condition adequate to continue to serve the permitted use after experiencing damage or decay. Repair and maintenance does not include: additions or alterations to any structure; replacement to a level that qualifies as substantial redevelopment as outlined in Policy 2.1-27 *Substantial Redevelopment*; changes in site development; a substitution of or a change to a nonconforming use; or an increase in area occupied by a nonconforming use.

COASTAL-DEPENDENT & RELATED DEVELOPMENT POLICIES

CITY PLANNING EFFORTS & PROGRAMS

Harbor

- Policy 2.2-1** Harbor Development. The Harbor shall be a working harbor with priority given to coastal-dependent uses, such as commercial fishing and recreational boating, for all users and income groups. The Harbor shall be developed and maintained as a resource for residents and visitors.
- Policy 2.2-2** Harbor Operations. Continue to operate and maintain the Harbor in a manner that ensures the viability of coastal-dependent uses, coastal-related uses, and lower cost visitor-serving uses.
- Policy 2.2-3** Harbor Support Uses. Protect, and where feasible, enhance existing Harbor support uses serving the needs of existing Waterfront uses, recreational boaters, the boating community, and visiting vessels.

Boating & Fishing

- Policy 2.2-15** Dry Boat Storage. Maintain existing dry boat storage areas at West Beach, Leadbetter Beach, and in the Harbor Commercial area.

PUBLIC ACCESS POLICIES

CITY PLANNING EFFORTS & PROGRAMS

Coastal Access

- Policy 3.1-2** Lateral Access Along the Coast. Lateral access along the beach is a public right. Public access opportunities along the coast shall be maximized consistent with public safety needs and the need to protect public rights, rights of private property owners, and natural resource areas from overuse. No attempts to prohibit or interfere with the public's lawful use of the beach area shall be allowed.

Manage Parking

- Policy 3.1-15** Coastal Access Parking. Maximize, maintain, improve, and promote efficient use of the parking supply for public access to the shoreline, coastal recreation areas, Stearns Wharf, and the Harbor. Where appropriate and feasible, continue to provide public parking facilities that are distributed throughout the Coastal Zone so as to provide convenient access to the shoreline and to avoid the impacts of overcrowding or overuse of any single area.

Public Access

- Policy 3.1-21** Public Access and Development. As outlined in Coastal Act Section 30211, development shall not interfere with the public's right of access to the sea where acquired through use or legislative authorization, including, but not limited to, the use of dry sand and rocky coastal beaches to the first line of terrestrial vegetation.

Manage Parking & Circulation

Policy 3.1-30 Preserve Existing Key Public Access Parking. Preserve public parking in existing Key Public Access Parking Areas (see Policy 3.1-35 *Locations of Key Public Access Parking Areas*) where safe, appropriate, and feasible. Permanent restrictions or reductions of public parking in Key Public Access Parking Areas (including seasonal restrictions) shall only be allowed if the restriction or reduction does not result in a significant adverse impact to public access to the shoreline and coastal recreation areas. Mitigation required to avoid a significant adverse impact to public access shall include the provision of 1:1 replacement parking or a comparable mitigation measure such as providing facilities for active transportation. The evaluation of impact(s) of a restriction or reduction of public parking may include public access mitigation measures proposed as part of the project (e.g. bus stop enhancements, bicycle parking, etc.). Mitigation shall be implemented prior to or concurrent with implementation of the restriction or reduction of public parking.

BIOLOGICAL RESOURCES POLICIES

DEVELOPMENT REVIEW POLICIES

Protection of ESHAs, Wetlands, & Creeks

Beaches

Policy 4.1-32 Beach Grooming and Disturbance of Wrack. Grooming and other disturbance activities on the beach shall be implemented in a manner to avoid the removal or disturbance of wrack (seaweed or other vegetation cast on the shore) to the extent feasible. All mechanized beach grooming should be restricted to dry sand area only and should not occur any closer to the ocean than ten feet landward of the predominant wrack line or the mean high tide line, whichever is further landward. Wrack should not be removed seaward of the predominant wrack line or the mean high tide line during grooming activities unless debris is entangled in the wrack that poses a threat to public safety or if the wrack is found to otherwise pose an immediate threat to public health and safety.

Policy 4.1-33 Avoidance of Sensitive Species on Beaches. New development, including but not limited to grooming and other disturbance activities, on the beach shall be designed to avoid impacts to any western snowy plovers, grunion (including grunion eggs), least terns, or other sensitive species present through timing of implementation, biological surveys, signage, temporary fencing, or other avoidance measures recommended by a qualified biologist and which are consistent with the policies of the Coastal LUP, including policies protecting public access to and along the shoreline.

SCENIC RESOURCES & VISUAL QUALITY POLICIES

DEVELOPMENT REVIEW POLICIES

Grading, Landscaping, Walls and Fences

Policy 4.3-9 Minimize Excavation, Grading and Earthwork. Minimize alteration of natural landforms to ensure that development is subordinate to surrounding natural features such as drainage courses, prominent slopes and hillsides, and bluffs. Site and design new development and

substantial redevelopment to minimize grading and the use of retaining walls, and, where appropriate, step buildings to conform to site topography.

Shoreline Development

Policy 4.3-19 Sea Walls, Other Protection Devices, and Fences on Beaches and Coastal Bluffs. Where the placement of sea walls or other protection devices on beaches or coastal bluffs is allowed pursuant to the Coastal LUP, or fences/walls are allowed at or near the coastal bluff edge, site and design the improvements to incorporate and blend in with the surrounding land form characteristics in order to preserve the natural and scenic quality of coastal bluffs and protect public scenic views.

CULTURAL RESOURCES POLICIES

DEVELOPMENT REVIEW POLICIES

Archaeology

Policy 4.4-7 Archaeological Resources Evaluation Requirement. Development proposed in any area known or suspected to contain archaeological resources, or identified as archaeologically sensitive on the City of Santa Barbara's Archaeological Resources Sensitivity Map, shall be evaluated to identify the potential for important or unique archaeological resources at the site and whether the proposed development may potentially have adverse impacts on those resources if present at the site.

COASTAL HAZARDS POLICIES

DEVELOPMENT REVIEW POLICIES

General

Policy 5.1-18 Hazard Risk Reduction. New development and substantial redevelopment shall do all of the following, over the expected life of the development, factoring in the effects of sea level rise:

- A. Minimize risks to life and property from high geologic, flood, and fire hazards;
- B. Assure stability and structural integrity; and
- C. Neither create nor contribute significantly to erosion, geologic instability, or destruction of the site or surrounding area.

Policy 5.1-19 Adaptation in Development. New development and substantial redevelopment shall consider the expected life of proposed development in conjunction with the best available information on climate change effects, particularly sea level rise, and incorporate adaptation measures, as needed, in the location, siting, and design of structures in order to minimize hazards and protect coastal resources for the life of the development.

Flooding

Policy 5.1-28 Minimize the Effects of High Flood Hazard. New development and substantial redevelopment shall meet the following requirements over the expected life of the development, factoring in the effects of sea level rise:

- A. Avoid high flood hazards where feasible;

- B. Where avoidance of high flood hazards cannot be feasibly achieved, minimize flood risk by increasing elevation of structures, restricting basements or habitable floor area below grade, restricting grading, restricting fencing or yard enclosures that cause water to pond, and/or utilizing flood proof materials consistent with local building requirements; and
- C. Neither create nor contribute significantly to downstream flooding, erosion, geologic instability, or destruction of the site or surrounding area.

Shoreline Hazards

Policy 5.1-29 Interim Shoreline Hazards Screening Areas Map.

- A. Figure 5.1-1 *Interim Shoreline Hazards Screening Areas* depicts hazard screening areas potentially subject to shoreline hazards including: beach erosion; coastal bluff erosion; coastal bluff slope failure or instability; coastal flooding; and wave impacts, now and in the future, factoring in the effects of sea level rise. The Map is based on data from geological investigations, surveys, aerial photos, best available science modeling of sea level rise, and other sources. The Map depicts areas potentially impacted from shoreline hazards resulting from 150cm of sea level rise with a 100-year storm event. The Map provides a screening-level tool that depicts where site specific technical evaluations may be required and where development standards pertaining to shoreline hazard areas may be applied. Any development subject to beach erosion, coastal bluff erosion, coastal bluff slope failure, coastal flooding, and/or wave impacts factoring in the effects of sea level rise, that are not located within the screening areas depicted on the Map, shall also be subject to the shoreline hazard policies of this Coastal LUP.
- B. Figure 5.1-1 *Interim Shoreline Hazards Screening Areas* shall be used in the interim period between CCC certification of this Coastal LUP and when new shoreline hazard screening procedures and maps are certified as part of the Sea Level Rise Adaptation Plan process.
- C. There are six potential shoreline hazards screening areas depicted on Figure 5.1-1 *Interim Shoreline Hazards Screening Areas* as follows:
 - i. Potential Shoreline Hazards Screening Area 1 (City-Owned Low-Lying Beach and Backshore Areas). This Area includes Arroyo Burro Beach; the portion of Arroyo Burro Beach Park subject to potential beach erosion; and the area bounded by the southerly prolongation of La Marina Drive to the west, Cabrillo Boulevard and Shoreline Drive to the north, the westerly edge of the Bellosguardo property to the east, and the ocean to the south, excluding Stearns Wharf and the developed portions of the Harbor. This Area is subject to the following potential shoreline hazards: beach erosion, coastal flooding, and wave impacts;
 - ii. Potential Shoreline Hazards Screening Area 2 (Bluff-Backed Beaches). This Area includes bluff-backed beaches from the mean high water line to the toe of coastal bluffs. This Area is subject to the following potential shoreline hazards: beach erosion, coastal bluff erosion, coastal bluff slope failure, coastal flooding, and wave impacts;

- iii. Potential Shoreline Hazards Screening Area 3 (Coastal Bluff Faces). This Area includes coastal bluff faces from the toe of coastal bluffs up to the coastal bluff edge. This Area is subject to the following potential shoreline hazards: coastal bluff erosion, coastal bluff slope failure, coastal flooding, and wave impacts;
- iv. Potential Shoreline Hazards Screening Area 4 (Coastal Bluff-Tops). This Area includes those portions of the bluff top landward of the coastal bluff edge. This Area is subject to the following potential shoreline hazards: coastal bluff erosion, landslide, and coastal bluff slope failure;
- v. Potential Shoreline Hazards Screening Area 5 (Stearns Wharf and Harbor). This Area includes the developed portions of Stearns Wharf and the Harbor. This Area is subject to the following potential shoreline hazards: beach erosion, coastal flooding, and wave impacts; and
- vi. Potential Shoreline Hazards Screening Area 6 (Inland Coastal Flooding Area). This Area includes low-lying areas potentially subject to coastal flooding that are not included in Potential Shoreline Hazards Screening Areas 1-5. This Area is subject to the following potential shoreline hazard: coastal flooding.

Policy 5.1-30 Development Standards for Potential Shoreline Hazards Screening Area 1 (City-Owned Low-Lying Beach and Backshore Areas) on the Interim Shoreline Hazards Screening Areas Map.

- A. New development and substantial redevelopment in the Potential Shoreline Hazards Screening Area 1 (City-Owned Low-Lying Beach and Backshore Areas) on Figure 5.1-1 *Interim Shoreline Hazards Screening Areas* shall be limited to:
 - i. Public trails, walkways, engineered staircases, or related public infrastructure to provide public access to the beach and coast;
 - ii. Habitat creation, restoration, and enhancement;
 - iii. Remediation or removal of hazardous materials;
 - iv. Reestablishment of natural landforms that have been altered by previous development activities;
 - v. Subsurface public utility pipes or lines with no other feasible inland siting alternative;
 - vi. Pipelines for coastal dependent industry;
 - vii. Flood control projects;
 - viii. Lifeguard towers;
 - ix. Public restrooms and showers;
 - x. Substantial redevelopment, alteration, or relocation of existing public structures and public parking lots provided there is no net increase in overall development area. Relocation shall be to a site that is not located on the beach and that has the same or smaller threat of erosion, coastal flooding, or other wave impacts than the existing site. Any needed

shoreline protection shall be consistent with the policies of this Coastal LUP, including Policy 5.1-44 *Shoreline Protection Device Permitting*;

- xi. Beach nourishment and dredged sediment management;
- xii. Shoreline protection devices found to be consistent with Policy 5.1-44 *Shoreline Protection Device Permitting*;
- xiii. Beach grooming found to be consistent with Policy 4.1-32 *Beach Grooming and Disturbance of Wrack*;
- xiv. Beach volleyball courts and other minor, at-grade, easily removable, recreational equipment; and
- xv. Temporary structures associated with a temporary event.

- B. New development and substantial redevelopment shall be sited outside areas subject to beach erosion and wave impacts over the expected life of the development, to the extent feasible, and factoring in the effects of sea level rise. If complete avoidance of beach erosion and wave impact hazards is not feasible, new development and substantial redevelopment shall be set back from beach erosion and wave impact hazards, to the maximum extent feasible. New development and substantial redevelopment shall be sited and designed to minimize the impacts of beach erosion, coastal flooding, and wave impacts to life and property; assure stability and structural integrity; and neither create nor contribute significantly to erosion, geologic instability, or destruction of the site or surrounding area over the expected life of the development, factoring in the effects of sea level rise.

Policy 5.1-34 Development Standards for Potential Shoreline Hazards Screening Area 5 (Stearns Wharf and Harbor) on the Interim Shoreline Hazards Screening Areas Map. New development and substantial redevelopment shall be sited and designed to minimize impacts of beach erosion, coastal flooding, and wave impacts to life and property; assure stability and structural integrity; and neither create nor contribute significantly to erosion, geologic instability, or destruction of the site or surrounding area over the expected life of the development, factoring in the effects of sea level rise. See additional policies addressing uses in this Area in Chapter 2.1 *Land Use & Development* and Chapter 2.2 *Coastal-Dependent & Related Development*.

Policy 5.1-44 Shoreline Protection Device Permitting.

- A. New or substantially redeveloped shoreline protection devices shall not be permitted unless avoidance measures, including consideration of relocation or removal of the at-risk structure, beach nourishment, dune creation, dune restoration, and other similar techniques are determined to be infeasible. Shoreline protection devices shall be prohibited unless they are necessary to, and will accomplish the intent of protecting public beaches, coastal-dependent uses, existing public structures, and existing principal structures (main living quarters, main commercial buildings, and functionally necessary appurtenances to those structures, such as wastewater and water systems, utilities, and other infrastructure) in danger from erosion. Shoreline protection 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. All shoreline protection devices shall:

- i. Be sited as far landward as feasible where appropriate;
- ii. Be designed to factor in the effects of sea level rise, including associated changes to beach erosion, coastal bluff erosion, coastal flooding, and wave impacts over the expected life of the development;
- iii. Be designed to have the smallest footprint possible;
- iv. Minimize alterations of the natural landform and natural shoreline processes to the maximum extent feasible;
- v. Avoid encroachment upon any beach area that impedes lateral public access along the beach at any tide condition. If it is infeasible to avoid impeding lateral access along the beach at any tide condition, mitigation shall be required that provides equivalent lateral access to that portion of shoreline at an alternate location;
- vi. Avoid adverse impact on public access to and along the shoreline and coastal recreation areas, to the maximum extent feasible, through project siting and design and required mitigation; and
- vii. Be designed to eliminate or mitigate adverse impacts on local shoreline sand supply.

Policy 5.1-46 Conditions of Approval for Shoreline Protection Devices for Public Development. Coastal Development Permits for new or substantially redeveloped shoreline protection devices for public development shall, at a minimum, include the following conditions:

- A. Require removal of the shoreline protection device by the applicant when either of the following occur:
 - i. The structure or use requiring protection is removed and the shoreline protection device is no longer needed for its permitted purpose; or
 - ii. The existing structure, public beach, coastal recreation area, or coastal dependent uses it is protecting is removed or no longer exists.
- B. Require any mitigation necessary to address impacts to public access and sand supply pursuant to subsections B.vi. and B.vii. of Policy 5.1-44 *Shoreline Protection Device Permitting*;
- C. Require all adverse impacts be monitored periodically and reassessed at the end of the permit term or when improvements are proposed that extend the life of the device, whichever comes first; and
- D. Require reevaluation of the design and necessity of the shoreline protection device when the protected structure is substantially redeveloped.

Policy 5.1-47 Legal Title. Applicants for proposed development on a beach or along the shoreline, including but not limited to a shoreline protection device, must demonstrate that they own adequate legal title to the underlying property. This includes, without limitation, that the applicants must demonstrate that the development either will not be constructed on

public trust tidelands or that the applicants have received appropriate legal authorization from the City or State Lands Commission, whichever is trustee for those particular lands, to undertake the development consistent with public trust principles.

DEFINITIONS & PROCEDURES

Procedures

Policy 5.1-63 Shoreline Hazard Evaluations.

- A. New development and substantial redevelopment in the Potential Shoreline Hazards Screening Areas 1-5 or areas otherwise subject to beach erosion, coastal bluff erosion, coastal bluff slope failure, and/or wave impacts shall require a Shoreline Hazard Evaluation. Shoreline Hazards Evaluations shall also be required for repairs and alterations of existing structures that require foundation work or substantial grading.
- B. The evaluation may be waived by the Environmental Analyst for:
 - i. Minor development that meets the following criteria:
 - a. Does not require a structural foundation;
 - b. Does not require slope stabilization, retaining walls, or other geotechnical mitigation measures;
 - c. Does not require significant grading or modified landforms; and
 - d. Designed to be easily removed.
 - ii. Development proposed in areas where previous hazard evaluations show no risk of the potential hazard (previous hazards evaluations completed for the development site must be no more than two years old).
- C. A City Environmental Analyst shall determine if and when a Shoreline Hazard Evaluation is required, the scope of analysis, and the adequacy of any submitted evaluations prior to consideration of a Coastal Development Permit. Some evaluations may require peer review by a technical specialist in order to be deemed adequate. The City may impose a fee on applicants to recover the cost of review of evaluations.
- D. The required content and procedures for shoreline hazard evaluations in each shoreline hazards screening area are specified in the policies below. All shoreline hazard evaluations shall use the current best available science on sea level rise projections to analyze hazard conditions on the site over the expected life of the proposed development. The evaluation should, at a minimum, examine storm (100-year storm) and non-storm conditions and sea level rise impacts under a high emissions scenario based on state guidance.

Policy 5.1-64 Potential Shoreline Hazards Screening Area 1 (City-Owned Low-Lying Beach and Backshore Areas) Evaluations for New Development and Substantial Redevelopment. The Potential Shoreline Hazards Screening Area 1 (City-Owned Low-Lying Beach and Backshore Areas) is potentially subject to beach erosion, coastal flooding, and wave impacts. Shoreline Hazard Evaluations for development in this screening area shall be prepared and signed by a qualified California licensed professional (e.g., Professional Geologist, Engineering Geologist, Geotechnical Engineer, Civil Engineer, Soils Engineer,

and/or Coastal Engineer, as applicable). The evaluations shall be subject to review and approval by the City's Environmental Analyst. The Environmental Analyst may require peer review of evaluations by a technical specialist in order to deem them adequate. The City may impose a fee on applicants to recover the cost of review of evaluations. Evaluations shall analyze the effects of the hazard and the development over the expected life of the project, factoring in the effects of sea level rise, and with and without the effects of any existing or new shoreline protective devices except for existing major public shoreline protection and flood protection devices (breakwater and other protection devices for the Harbor, Laguna Channel Tide Gate and Pump Station Facility, etc). The evaluation may assume that existing authorized levels of dredging, sand management, and beach nourishment continue to occur. The following shall be evaluated:

- A. The profile of the beach;
- B. Mean high tide line, including a mean high tide line survey (unless data shows the mean high tide line will not be affected by the project);
- C. The area of the project site subject to beach erosion, coastal flooding, and wave impact hazards;
- D. The FEMA Base Flood Elevation and mapped areas;
- E. Future projections in sea level rise, associated beach erosion, coastal flooding, and wave impacts, and any additional sea level rise related impacts that could be expected to occur over the life of the project in both storm (100-year storm) and non-storm scenarios. The analysis shall utilize best available science and include, at a minimum, evaluation of projected sea level rise at a high emission scenario based on state guidance;
- F. Design requirements to assure stability and structural integrity;
- G. The need for a shoreline protection device over the life of the project;
- H. The long-term impacts of proposed development on sand supply;
- I. The impacts of the proposed development during construction and operation on beach erosion, coastal flooding, wave impacts, and any other hazards on or near the site;
- J. The impacts of proposed development on public access to and along the shoreline;
- K. Any necessary mitigation measures, alternatives, or monitoring protocols to be completed over the life of the development and that are needed to avoid or minimize any potential beach erosion, coastal flooding, wave impacts hazards, and any potential impacts to public access to and along the shoreline; and
- L. A statement verifying whether the development will minimize risks to life and property; assure stability and structural integrity; and neither create nor contribute significantly to erosion, geologic instability, or destruction of the site or surrounding area over its expected life, factoring in the effects of sea level rise.

Policy 5.1-68 Potential Shoreline Hazards Screening Area 5 (Stearns Wharf and Harbor) Evaluations for New Development and Substantial Redevelopment. Potential Shoreline Hazards Screening Area 5 (Stearns Wharf and Harbor) is potentially subject to beach erosion, coastal flooding, and wave impacts. Shoreline Hazard Evaluations for development in this screening area shall be prepared and signed by a qualified California licensed professional (e.g., Professional Geologist, Engineering Geologist, Geotechnical Engineer, Civil Engineer, Soils Engineer, and/or Coastal Engineer, as applicable). The evaluations shall be subject to review and approval by the City's Environmental Analyst. The Environmental Analyst may require peer review of evaluations by a technical specialist in order to deem them adequate. The City may impose a fee on applicants to recover the cost of review of evaluations. Evaluations shall analyze the effects of the hazard and the development over the expected life of the project, factoring in the effects of sea level rise, and with and without the effects of any existing or new shoreline protective devices, except for existing major public shoreline protection and flood protection devices (breakwater and other protection devices for the Harbor, Laguna Channel Tide Gate and Pump Station Facility, etc). The following shall be evaluated:

- A. The area of the project site subject to beach erosion, coastal flooding, and wave impact hazards;
- B. The FEMA Base Flood Elevation and mapped areas;
- C. Future projections in sea level rise, associated beach erosion, coastal flooding, and wave impacts, and any additional sea level rise related impacts that could be expected to occur over the life of the project in both storm (100-year storm) and non-storm scenarios. The analysis shall utilize best available science and include at a minimum evaluation of projected sea level rise at a high emission scenario based on state guidance;
- D. Design requirements to assure stability and structural integrity;
- E. The need for a shoreline protection device over the life of the project;
- F. The impacts of the proposed development during construction and operation on beach erosion, coastal flooding, wave impacts, and any other hazards on or near the site;
- G. Any necessary mitigation measures, alternatives, or monitoring protocols to be completed over the life of the development that are needed to avoid or minimize any potential beach erosion, coastal flooding, and wave impact hazards; and
- H. A statement verifying whether the development will minimize risks to life and property; assure stability and structural integrity; and neither create nor contribute significantly to erosion, geologic instability, or destruction of the site or surrounding area, during its expected life, factoring in the effects of sea level rise.

Policy 5.1-72 Shoreline Protection Device Evaluation Requirements. Any application for installation of a new or a modification to an existing shoreline protection device shall require the following:

- A. A description of the structure in danger and the threats to the structure;

- B. A site-specific evaluation prepared and signed by a qualified California licensed professional (e.g., Professional Geologist, Engineering Geologist, Geotechnical Engineer, Civil Engineer, and/or Coastal Engineer, as applicable). The evaluation is subject to review and approval by the City's Environmental Analyst, including possible peer review at the expense of the applicant. The evaluation shall analyze the effects of the shoreline protection device over the expected life of the project, factoring in the effects of sea level rise. The following shall be evaluated, along with all information needed to comply with Policy 5.1-44 *Shoreline Protection Device Permitting*:
- i. The profile of the beach;
 - ii. Mean high tide line, including a mean high tide line survey;
 - iii. The area of the project site subject to beach erosion, coastal bluff erosion, coastal bluff slope failure, coastal flooding, and wave impact hazards;
 - iv. Future projections in sea level rise, associated beach erosion, coastal flooding, coastal bluff erosion, coastal bluff slope failure, and wave impacts, and any additional sea level rise related impacts that could be expected to occur over the life of the project in both storm (100-year storm) and non-storm scenarios. The analysis shall utilize best available science and include, at a minimum, evaluation of projected sea level rise at a high emission scenario based on state guidance;
 - v. Design requirements to address stability and structural integrity;
 - vi. The long-term effects of the device on sand supply;
 - vii. The impacts of the device during construction and operation on beach erosion, coastal bluff erosion, coastal bluff slope failure, coastal flooding, wave impacts, and any other hazards on or near the site;
 - viii. The impacts of the device on the ability of the mean high tide line to shift landward due to sea level rise and natural coastal processes;
 - ix. The impacts of the device on public access to and along the shoreline, coastal recreation areas, and beach widths (additional evaluations may be needed to analyze impacts to habitat areas pursuant to the policies in Chapter 4.1 Biological Resources); and
 - x. Any necessary mitigation measures and all feasible non-intrusive and least environmentally damaging alternatives to shoreline protection including, but not limited to, siting the device as far landward as feasible, relocation or removal of portions of the threatened structures, drainage control and improvements, installation of drought tolerant landscaping, and other adaptation strategies. Priority shall be given to options that protect, enhance, and maximize coastal resources and access, including giving full consideration to nature-based or "soft" approaches such as living shoreline techniques, beach nourishment, or planned retreat.
- C. A site map that shows all easements, deed restrictions, or "Offers to Dedicate" and/or other dedications for public access or open space and provides

documentation for said easements or dedications. The approved device shall be located outside of and consistent with the provisions of such easements or offers; and

- D. If the project involves development on public trust lands, then review by the appropriate trustee to the public trust lands (e.g. City of Santa Barbara or State Lands Commission) shall be required.