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California Coastal Commission
Central Coast District
725 Front Street, Suite 300
Santa Cruz, CA 95060

October 7, 2022

Agenda Item F10e
Meeting date October 14, 2022

Santa Cruz County LCP Amendment Number LCP-3-20-006602 (Coastal Hazards Update)
Position: **OPPOSE (Deny Certification of Amendments)**

Dear Chair Brownsey and Commissioners,

The Sierra Club encourages your Commission to deny certification of Land Use Plan Amendment LCP-3-20-006602 as submitted by Santa Cruz County. The Sierra Club is aware of the extensive local process, including multiple well-attended public hearings at both the Planning Commission and Board of Supervisors levels, and acknowledges that the proposed amendments include welcome additions to the Local Coastal Plan, as discussed further below. However, the inclusion of a de facto exemption for new and substantially redeveloped properties with regard to coastal armoring substantially conflicts with the Coastal Act, and goes beyond any allowable accommodation of local existing conditions.

The Coastal Staff Report, at pages 24-27, clearly articulates an ongoing controversy in Santa Cruz County with regard to the determination of the minimum setback, concerning the terms “existing site conditions” and “proposed protection measures”. This is hardly an abstract discussion, as currently in the County there is a (denied) project on appeal wherein the Applicant is arguing that the new 6000+ sq. ft. house with a 4000+ sq. ft. basement may use the minimum allowed setback of 25 feet, as opposed to being located at a safe building location over at least 100 years without reliance on armoring.¹ For consistency with Coastal Act policies, the County’s updated LCP must include policies that require new development to be safe from coastal hazards risk, including future hazards due to climate change and sea level rise, and provide that new development that would rely on shoreline armoring is prohibited, and that adverse impacts of shoreline armoring, when allowed, be avoided, lessened, and mitigated for when unavoidable.

¹ Application Number 211155; APN 028-242-25; 22702 E. Cliff Drive, Santa Cruz, CA

Although there may be limited circumstances under which armoring, including the maintenance of “legacy armoring”, is warranted, the setback analysis for new development should not rely on that legacy armoring. It must be noted that removal of existing armoring when new development or redevelopment occurs may not be the proper course. Many stretches of coastal bluff in the Mid-County region have adjacent parcels that intertwine to form an in essence “unified” structure that may stretch from one lagoon opening to another, as seen below. The removal of armoring as a condition of new development may have adverse consequences on the entire stretch. What is called for is that the new development give up its right to any armoring (even though it may already have “legacy armoring”), with an expectation that a coordinated approach may be used later. The lined-in areas below are illustrative examples of bluff segments which may require coordinated planning:



Mid-County region from Sunny Cove to Soquel Point

Public Infrastructure – Coastal Lagoon Roads

Should these amendments be denied certification and returned to Santa Cruz County, it is important that certain proposed changes be maintained. There are new Guiding Principles² which properly identify needed planning changes for roadways, as seen here:

- Recognize that roadways crossing the mid-County lagoons (Schwann, Corcoran, and Moran) are not candidates for seawall protection, and that future road designs for crossing the lagoons will likely require bridges if the roads are to continue in their current locations, which should be a priority adaptation project for the County and adjacent cities in light of regional significance.

² F10e-10-2022 Exhibit 3, County LUP change track, pages 34-39

The subsurface inter-tidal linkage between the lagoons and the ocean is restricted by the weight of the roadway, and the breaching of the lagoons is constrained to only occur in the area of culvert openings. Both conditions negatively impact lagoon health.



Moran Lagoon road crossing on East Cliff Drive, with a single culvert which constricts breach location, and significant weight placed upon the rest of the original lagoon frontage.

The mid-County lagoon crossing roads already are vulnerable to wave inundation, as seen in the sequence below:



Wave breaking at the Moran Frontage





Rocks and debris across East Cliff Drive at the Moran lagoon frontage

The Sierra Club appreciates the new policy clarification regarding lagoon roads and recommends that your Commission ensure that this addition survive through any possible future revisions.

Littoral Drift

The new Guiding Principles also include the following:

- Recognize that the dredging practices of the Santa Cruz Port District, especially dredging spoils disposal location, have impacts to the amount of sand transported downcoast during winter months and to the amount of downcoast erosion. Work with the Santa Cruz Port District to implement dredging disposal policies which minimize downcoast impact and maximize beaches during high recreational seasons.

The Sierra Club appreciates this acknowledgement of the need for cooperation for regional sand management, including assessing the impacts of sand removal, and its temporary warehousing high on the beach, by the Port District during winter months. It is understood in the downcoast beach community that the method of dredge spoils disposal, whether back out into the water downflow from the harbor, or up onto their beach, may dramatically impact the amount of sand directly downcoast in the mid-County area during the highly erosive big wave months of winter.

Summary

The Sierra Club acknowledges the large amount of work that has gone into the proposed Santa Cruz County LCP update, including the significant amount of public participation. We encourage you to deny certification to these amendments, with the hope that Coast Commission staff and the County can resolve the issues of concern.

Sincerely,

Michael A. Guth

Executive Committee Chair, Santa Cruz Group of the Ventana Chapter of the Sierra Club