COASTAL CONSERVANCY

Staff Recommendation
June 5, 2008

SURFERS POINT MANAGED RETREAT PROJECT

File No. 08-057
Project Manager: Kara Kemmler

RECOMMENDED ACTION: Authorization to disburse up to $1,500,000 to the City of San Buenaventura to implement the Surfers Point Managed Retreat Project in the City of San Buenaventura.

LOCATION: Surfers Point, City of San Buenaventura, Ventura County

PROGRAM CATEGORY: Resource Enhancement, Public Access

EXHIBITS

Exhibit 1: Regional Location
Exhibit 2: Project Plans
Exhibit 3: Photos
Exhibit 4: Final Environmental Impact Report
Exhibit 5: City's Resolution to adopt FEIR
Exhibit 6: Letters of Support

RESOLUTION AND FINDINGS:

Staff recommends that the State Coastal Conservancy adopt the following resolution pursuant to Sections 31251-31270 and 31400 *et seq.* of the Public Resources Code:

"The State Coastal Conservancy hereby authorizes disbursement of an amount not to exceed $1,500,000 (one million five hundred thousand dollars) to the City of San Buenaventura (City) to implement the Surfers Point Managed Retreat Project in the City of San Buenaventura, subject to the following conditions:

1. Prior to the disbursement of any funds, the City shall submit for the review and written approval of the Conservancy's Executive Officer a work program, schedule and budget for the project; all contractors to be employed for the project; evidence of all permits and approvals for the project; and evidence that the grantee has secured the necessary funding to undertake the project;

2. The City shall acknowledge Conservancy funding by erecting and maintaining on the property, or at another approved location, a sign that has been reviewed and approved by the Conservancy's Executive Officer; and
3. The City shall comply with all applicable mitigation and monitoring measures that are required by any permit and that are identified in the "Surfers Point Managed Shoreline Retreat Final Environmental Impact Report adopted by the City on July 21, 2003."

Staff further recommends that the Conservancy adopt the following findings:

"Based on the accompanying staff report and attached exhibits, the State Coastal Conservancy hereby finds that:

1. The project is consistent with the current Project Selection Criteria and Guidelines.
2. The authorization is consistent with the purposes and objectives of Chapter 6 and 9 of Division 21 (§§ 31251-31270 and 31400 *et seq.*) of the Public Resources Code, regarding the enhancement of coastal resources and public access.
3. The project will serve greater than local needs.
4. The Conservancy has independently reviewed and considered the information contained in the Surfers Point Managed Shoreline Retreat Final Environmental Impact Report (EIR) adopted by the City, pursuant to its responsibilities under California Code of Regulations Sections 15091 and 15096, and finds that the project avoids, reduces or mitigates the possible significant environmental effects to a level of insignificance, and there is no substantial evidence that the project, as mitigated, will have a significant adverse effect on the environment, as defined in 14 Cal. Code Regulations Section 15382."

PROJECT SUMMARY:

Staff recommends the Conservancy authorize the disbursement of up to $1,500,000 to the City of San Buenaventura (City) to implement the Surfers Point Managed Retreat Project. One third of the funding for this project will come from a Coastal Impact Assistance Program (CIAP) grant awarded to the Conservancy for this project. The remaining funds ($1,000,000) to be disbursed are Conservancy funds. (See "Project Funding" below).

The project is located in the City adjacent to the mouth of the Ventura River (Exhibit 1). The project area is a heavily used beach access point and encompasses about 1,800 linear feet of shoreline, a segment of the State Senator Omer Rains Bicentennial Bikeway which is part of the California Coastal Trail, an existing parking lot, and a public street. The site is a very popular surfing beach and recreational destination. For the past 20 years, the site has experienced severe beach erosion, damaging the existing bike path and parking lot. In some places, the land has eroded by as much as 60 feet inland. This project was developed to provide a comprehensive response to the beach erosion problem.

The northern portion of the project area is part of the County Fairgrounds, owned and governed by the 31st Agricultural District (Fair Board), a branch of the California Department of Food and Agriculture. The City, Fair Board and State Parks each own a portion of the project area. The

City has taken the lead in this project to help facilitate a solution from all affected stakeholders. The project design was developed in collaboration with the Surfers Point Working Group, which includes members from the City, the Fair Board, State Parks, the Coastal Commission, the Conservancy, State Senate and Assembly members, Surfrider Foundation, Ventura Bicycle Coalition, and the Full Sail Windriders Club.

The project was developed to accomplish the following objectives:

- remove all existing improvements seaward of Shoreline Drive, including the damaged bike path and eroded public parking lot and relocate them further inland;
- modify Shoreline Drive to allow for retreat of the existing parking facilities and preserve public access to Surfers Point in the face of sea level rise;
- improve parking by constructing two new low impact development (LID) parking lots that incorporate runoff treatment controls, including appropriate landscaping, permeable surfaces and a stormwater treatment system, and installation of an entry kiosk and bicycle parking;
- improve recreational amenities by constructing a new multi-use trail to replace the existing path, creating a new interpretive area and expanding an existing picnic area;
- restore the retreat zone and provide protection for the new improvements by recontouring the retreat area with natural beach materials and recreating sand dunes (see Exhibit 2).

As shown in the Site Plan, Exhibit 2, the project will relocate and redesign the existing parking lot and bike path to maximize available beach and sand dune habitat area and provide water quality benefits through the implementation of Best Management Practices (BMPs) at the new parking lot locations. The new parking areas will be located 80 to 130 feet landward of the existing parking area. The Omer Rains Bicentennial Bikeway will be moved 60 feet landward of its existing location along the new coastal access parking lot. The length of the existing Shoreline Drive will be shortened by 1,200 feet and a new roundabout will be installed at its western terminus creating area for and allowing circulation into and out of the two new parking lots to be relocated at the western end of the redesigned street. In addition, 24 on-street, twenty-minute “surf check” parallel parking spaces will be delineated to enhance coastal access.

The southern parking lot will be paved with permeable recycled asphalt using recycled materials from the demolition of the existing facilities. This lot will provide approximately 130 high frequency public parking spaces and, as the lot adjacent to the Omer Rains Bicentennial Bikeway and beach, it will be utilized primarily for coastal access during daylight hours. The northern parking lot will consist of a grass pave surface and provide approximately 170 reduced frequency parking spaces primarily serving the Fairgrounds but may also be made available for overflow coastal access parking as needed. The drainage system improvements which include bioswales planted with native wetland species, a sand infiltration layer underlying the new permeable asphalt parking lot, and an underground stormwater treatment system that will treat all runoff prior to release into the estuary will greatly improve water quality in the estuary and at the beach.

The project proposes to enhance the visitor’s experience through improvements to the existing path and passive recreation areas, expansion of the existing turf picnic area and creation of a new interpretive area. The design includes creation of an interpretive area approximately 1800 sq. ft.

in size with recycled concrete surfacing, benches and interpretive art installations to introduce educational uses to the site and enhance recreational uses. In addition, various pathways will lead pedestrians from the parking lots to the bikeway or beach. Low fencing will funnel pedestrians to composite lumber boardwalks providing controlled access through dunes to enable passive recreation without habitat disturbance. The existing turf picnic area at the east end of the project will be expanded and the existing bicycle roundabout will include new recycled concrete accent paving.

Once the existing improvements are removed, the retreat zone will be restored with buried cobble covered with sand to provide a base for sand dune recreation and stabilize the beach fronting the new bike path. Dune restoration will be achieved by placement of feeder dune and sand material over the cobble beach and revegetation with native dune plants. Dune management will include vegetation maintenance, designated walkways to focus access and interpretive signage to educate beach users. The dunes are expected to erode naturally during storms, thereby naturally replenishing down coast beaches and would be periodically restocked on an as needed basis.

Final design, construction drawings, environmental review and permitting have been completed with state and local grants as well as substantial in-kind support from the City and assistance from State Parks. The project is scheduled to begin this fall. This summer the City will use funds to transport cobble material to a storage site as the opportunity arises to obtain cobble from other projects in order to reduce purchase costs for construction materials.

This project is one of the first managed retreat projects to be implemented in California. It will serve as a model of sustainable shoreline management and for other similar projects up and down the California coast. The project was featured at the California and the World Ocean Conference in 2006 and as a case study for managed retreat by NOAA's Office of Ocean and Coastal Resource Management. Once implemented, the project will restore and enhance the ecological structure and function of the shoreline as well as enhance the visitor's experience, including widening the sandy beach, restoring sand dune habitat, boosting water quality and relocating and improving public access and recreation facilities.

Site Description: The project site is a popular recreational destination located in the City of Ventura adjacent to the mouth of the Ventura River. The site consists of approximately 1800 linear feet of sand and cobble beach with small restored remnant dunes and various beachfront public access improvements. Currently the site is developed with portions of an existing bike path and an approximately 223-space parking lot, associated landscaping, trash receptacles and an entry kiosk, a turf picnic area, and Shoreline Drive. The bike path is within an easement that was incorporated within the State Senator Omar Rains Bicentennial Bikeway, and is the responsibility of the State Department of Parks and Recreation (State Parks). The parking lot is what remains of a 352-space parking lot that was constructed in 1989 and damaged by wave action two years later along with the bike path (see Exhibit 3). The runoff from the parking lot and street currently run directly into a storm drain and into the ocean or river estuary untreated. The parking and street are owned and maintained by the Fairgrounds.

Public access to Surfers Point exists in three forms: vehicle, bicycle and pedestrian access via Shoreline Drive, a public road that extends west from Figueroa Street to the Ventura River levee,

parallel to shore, and provides access to the existing beachfront parking lot; bicycle and pedestrian access via the existing multi-use path, which runs from the City of Ojai several miles north of the site, merges with the Promenade (a broad walkway that parallels the beach from the western end of Surfers Point Park to the Ventura Pier) and continues approximately two miles east to the eastern end of San Buenaventura State Beach; and pedestrian access via the sandy beach.

The beach also hosts many events throughout the year includes surf contests and festivals. The beach at Surfers Point is a very popular recreational resource for beachgoers, surfers, windsurfers and kitesurfers, and the path is highly used by pedestrians, rollerbladers, runners and bikers. The path also serves as a connection from the beach to the upper Ventura River watershed. This project will improve the recreational facilities onsite and enhance the visitor's experience while restoring and protecting the beach and improving water quality at the adjacent heavily used surfing beach.

Bordering the northern end of the project area is the Ventura County Fairgrounds, also known as Seaside Park, a year-round facility that includes convention facilities, demonstration halls, administrative offices, equestrian facilities, a simulcast horse racing club, a racetrack, and an 110,000 sq. ft. arena. Seaside Park hosts the annual Ventura County Fair and other events throughout the year, including trade shows, conventions, concerts, and festivals. The project will also serve to enhance access for visitors between the beach and Seaside Park.

The project is located adjacent to the Ventura River. The Ventura River watershed encompasses about 226 square miles. This watershed is a long time priority for the Conservancy and upstream the Conservancy is currently working on the largest project in the watershed, the Matilija Dam Ecosystem Restoration Project. For more than a decade, a broad coalition of local, state, federal, and private agencies have been working to study the feasibility of removing Matilija Dam, one of the largest dam removal projects in the country.

One of the major impacts of the dam is the loss of natural sediment transport. As a result, the dam has contributed to significant beach erosion along the coast. Alluvial floodplains downstream have diminished drastically, the product of a changed flow regime and the reduced sediment supply, resulting in a depleted sand budget and eroded beaches at the estuary and along the coast. Over the last 50 years, Emma Wood State Beach, just west of the mouth of the Ventura River, has eroded approximately 150 feet-- a retreat that is equivalent to an erosion rate of 2 to 3 feet per year. Surfers Point, which is just down coast of the river mouth, was once a sandy beach but is now mostly cobble.

Removal of Matilija Dam will return the river to more natural conditions, increasing sediment flow downstream, creating alluvial floodplain habitat, and replenishing the sand-starved beaches along the coast. In concert with the Matilija Dam removal project, the Surfers Point Managed Retreat Project will restore the beach profile to natural conditions.

Project History: In 1989, the City and the Fairgrounds constructed the Surfers Point redevelopment project as the last component of the City's program to revitalize the shorefront between the Ventura Pier and the Ventura River. The project involved the development of approximately six acres of shorefront land with a new street (Shoreline Drive), a beachfront bike

path (the Omer Rains Bicentennial Bikeway), public parking facilities, and a small dune habitat area.

Shortly after completion of the redevelopment project, winter storm waves began to erode the dune areas at Surfers Point. Ultimately, erosion became severe enough that portions of the bike path collapsed. In response, the City considered various emergency measures to temporarily halt the erosion until a permanent solution could be developed, including two applications to the Coastal Commission for coastal permits to construct a rock revetment near the western end of the point. The Commission denied both permit applications, indicating that the improvements constructed in 1989 were intended to be temporary since they were constructed in an area known to be subject to hazardous conditions. Instead, the Commission recommended relocating the improvements further inland and seeking non-structural solutions to the erosion problems at Surfers Point. The City, however, issued an emergency coastal permit on December 11, 1992, and constructed the revetment in December 1992. The revetment was intended to be temporary, but currently remains in place.

In 1995, State Senator Jack O'Connell and Assemblyman Brooks Firestone convened a Working Group consisting of representatives of concerned agencies (the Coastal Commission, State Parks, the Fairgrounds, and the City) and other interested parties (Surfrider Foundation, Ventura County Bicycle Coalition) to resolve longstanding issues relating to preservation of the Surfers Point shoreline. The task before the Working Group was to determine how best to restore and protect the popular bike and pedestrian path, public parking area, dune habitat, and sandy beach. A number of alternatives were developed, ranging from traditional methods to protect the bike path and parking lots in their existing locations to complete removal and abandonment of the public improvements within a designated buffer zone. The project plans evolved over several years based upon input from stakeholders during frequent Surfers Point Working Group meetings and public comments during the Environmental Impact Review (EIR) process.

PROJECT FINANCING:

Coastal Conservancy	$1,500,000
Fed SAFETEA-LU	$1,500,000
City of Ventura	$172,500
OPC (pending)	$500,000
Other sources TBD	$3,383,500
Total Project Cost	**$7,056,000**

The anticipated source of Conservancy funds is an appropriation from the Safe Drinking Water, Water Quality and Supply, Flood Control, River and Coastal Protection Bond Act of 2006 (Proposition 84). Consistent with the purposes of this funding source, this project will help protect beaches, bays and coastal waters and watersheds undertaken pursuant to the Conservancy's enabling legislation (Division 21 of the Public Resources Code). The proposed project is consistent with the Conservancy's enabling legislation, as discussed in the section below.

Proposition 84 also requires that for potential projects that include restoration for the purpose of natural resources protection, the Conservancy give priority to potential projects that meet one or more of the criteria specified in Section 75071. The proposed project satisfies the criteria specified in Section 75071 in that it will prevent contamination and degradation of coastal waters and protect and restore the natural habitat values of coastal waters and lands. In addition, the project will promote access to and enjoyment of the state's coastal resources and there are non-state matching contributions toward the restoration, stewardship or management costs. The City of Ventura, Federal Department of Transportation, the Ocean Protection Council and other sources of funding are expected to leverage the Conservancy's grant to this project. In addition, one third of the Conservancy's funds are anticipated to come from a Coastal Impact Assistance Program (CIAP) grant awarded for this project. These grants fund conservation, protection, or restoration of coastal areas. The proposed authorization is thus consistent with the funding requirements of Proposition 84.

CONSISTENCY WITH CONSERVANCY'S ENABLING LEGISLATION:

Chapter 6 of Division 21 of the Public Resources Code (Sections 31251-31270) authorizes the Conservancy to award grants to public agencies for the enhancement of significant coastal natural resources that have suffered loss of natural and scenic values due to improper location of improvements and human-induced events (Pub. Res. Code §§ 31251, 31251.2). Consistent with these sections, the proposed project will relocate improperly placed improvements, restore the beach and improve coastal water quality.

Consistent with Public Resources Code Section 31252, this specific project has been included in the City of Ventura Local Coastal Plan as an area requiring public action to address a resource problem, in this case degraded public access facilities and beach erosion. In determining the amount of Conservancy funding for this project, the factors identified in §31253 have been considered and applied, as described in detail below, under the heading "Consistency With Conservancy's Project Selection Criteria & Guidelines."

In addition, Chapter 9 Public Resources Code Section 31400 directs the Conservancy to have a principal role in the implementation of public accessways to and along the state's coastline. To this end, §31400.3 authorizes the Conservancy to "provide such assistance as is required to aid public agencies and nonprofit organizations in establishing a system of public coastal accessways" and §31400.1 authorizes the Conservancy to award grants to a public agency for purposes of developing lands suitable for public accessways to and along the coast, when the subject accessways serve greater than local needs. The project goal is to restore the damaged facilities that provide public access to the beach and along the coast including a portion of the Coastal Trail. The project would serve the recreational needs of visitors from all parts of Ventura, Santa Barbara and Los Angeles counties and from around the state to the project area as discussed previously.

Consistent with §31253 and 31400.2, staff recommends approval of this project after evaluating the amount of funding provided by the Conservancy in light of the total amount of available for coastal resource enhancement projects and public accessway projects respectively, the fiscal resources of the grantee, and the application of factors prescribed by the Conservancy for the purpose of determining project eligibility and priority.

CONSISTENCY WITH CONSERVANCY'S 2007 STRATEGIC PLAN GOAL(S) & OBJECTIVE(S):

Consistent with **Goal 1, Objective B** of the Conservancy's 2007 Strategic Plan, the proposed project would rebuild a segment of the coastal trail and install new coastal trail signage along its realigned route.

Consistent with **Goal 2, Objective B**, the proposed project involves redevelopment of a waterfront park including a significant segment of the coastal trail that connects to the river. In addition, the project design includes an innovative low impact development stormwater treatment system.

Consistent with **Goal 2, Objective E**, the proposed project will reconstruct damaged, unsafe recreational facilities which will enhance the visitor experience and increase coastal recreational opportunities.

Consistent with **Goal 3, Objective B**, the proposed project will serve to encourage and promote public access to and along the coast, including enhancement of wheelchair accessibility.

Consistent with **Goal 3, Objective C**, the proposed project includes interpretive areas and public art installations that will emphasize coastal resource education and highlight the connection from the beach to the river watershed.

Consistent with **Goal 5, Objective B**, the proposed project will restore sand dune habitat.

Consistent with **Goal 6, Objective F**, the proposed project will implement a low impact stormwater treatment system that utilizes bioswales and sand filters to infiltrate and treat runoff prior to reaching the river estuary or beach greatly improving water quality.

Consistent with **Goal 6, Objective G**, the proposed project offers a solution to shoreline erosion and, in concert with the Matilija Dam Ecosystem Restoration Project, constitutes a regional approach to sediment management.

CONSISTENCY WITH CONSERVANCY'S PROJECT SELECTION CRITERIA & GUIDELINES:

The proposed project is consistent with the Conservancy's Project Selection Criteria and Guidelines, last updated on September 20, 2007, in the following respects:

Required Criteria

1. **Promotion of the Conservancy's statutory programs and purposes:** See the "Consistency with Conservancy's Enabling Legislation" section above.
2. **Consistency with purposes of the funding source:** See the "Project Financing" section above.
3. **Support of the public:** The proposed project has widespread community and agency support. The City and the Fairgrounds have been collaborating with a multi-stakeholder working group, including state and local agencies as well as community nonprofit organizations. The project is supported by Assemblymember Pedro Nava, California State Parks, the Surfrider Foundation, the Ventura County Bicycle Coalition and enjoys enthusiastic support from members of the general public. Letters of support are attached as Exhibit 6.
4. **Location:** The proposed project would be located within the coastal zone of the City of San Buenaventura in Ventura County.
5. **Need:** The City has applied for several grants for the project but still needs a significant amount of funding to complete the project. Conservancy funding is needed to implement the project as well as to leverage additional funds for the project. Without Conservancy participation, the project would not move forward.
6. **Greater-than-local interest:** The project site is a very popular surfing and kitesurfing beach and recreational destination. In addition, the project site hosts various contests and festivals on the beach and the adjacent Fairgrounds host Ventura County Fair and other various events throughout the year that draw visitors from all over the state.

Additional Criteria

7. **Urgency:** As the existing path and parking lot are currently threatened by coastal erosion, the project must be implemented at the earliest opportunity in order to avoid loss of recreational amenities. In addition, timely funding will allow the City to take advantage of opportunity material that becomes available from other projects in the region that will provide cobble for the project reducing the overall cost of construction.
8. **Resolution of more than one issue:** The project will address the threat of coastal erosion, improve coastal water quality, restore sand dune habitat, and enhance public access and recreation.
9. **Leverage:** See the "Project Financing" section above.

10. **Conflict resolution:** The project balances the needs of the public and natural resource impacts while maintaining the Fair Board's economic use of the site.
11. **Innovation:** This managed retreat project offers an innovative approach to preserve and restore the beach that will serve as a model for other threatened beaches along the coast. In addition, the project includes LID solutions to water quality improvement.
12. **Readiness:** The EIR has been certified, final plans are complete and a coastal permit has been approved for the project. Once this authorization is approved, the City will be ready to accept any opportunity material that may come available this summer that could be stored and used for the cobble berm portion of the project resulting in big cost savings for the construction of the project.
13. **Realization of prior Conservancy goals:** The Conservancy has been involved in restoration efforts within the Ventura River watershed for more than a decade, including the Matilija Dam removal project which will work in tandem with this project to restore the beach. The Conservancy has provided funding for the City's previous effort to replenish the beach in this location by implementing a cobble nourishment demonstration project. This project is an integral step toward realizing the Conservancy's goals of water quality improvement and beach preservation.
15. **Cooperation:** The project is the result of a collaboration of a working group composed of various stakeholders including, the City, the Fairgrounds, State Parks, the Coastal Commission, the Coastal Conservancy, the Surfrider Foundation, the Ventura County Bicycle Coalition and others.

CONSISTENCY WITH LOCAL COASTAL PROGRAM POLICIES:

The City of Ventura has a certified Local Coastal Program (LCP), however, a portion of the project is located on the beach within the area designated as permanent jurisdiction of the Coastal Commission. Therefore, the project must be reviewed for consistency with the City's LCP as well as the Coastal Act.

The project is consistent with Coastal Act Sections 30210 and 30211 and City LCP Policy 15.10, which mandate that maximum public access and recreational opportunities be provided consistent with protection of public safety and fragile coastal resources and that development not interfere with the public's right to access the coast.

Sections 30230 and 30231 of the Coastal Act mandate that marine resources and coastal water quality shall be maintained and where feasible restored and that uses of the marine environment shall be carried out in a manner that will sustain biological productivity of coastal waters. Section 30240 of the Coastal Act requires that environmentally sensitive habitat areas (ESHA) be protected and that development be sited and designed to prevent impacts to such areas. Resources Goal No. 3 of the LCP mandates that "any development of the coastal zone preserves and maintains the natural assets of the shoreline." The proposed project is consistent with these coastal resource protection policies as it is designed to preserve and enhance the sandy beach, native sand dune habitat, and coastal water quality.

The project was reviewed and approved by the City and Commission for consistency with the LCP and Coastal Act, respectively, and coastal development permits have been approved with conditions for the project.

COMPLIANCE WITH CEQA:

The City, as the lead agency under the California Environmental Quality Act (CEQA), reviewed the Final Environmental Impact Report (EIR) for the Surfers Point Managed Shoreline Retreat project on July 21, 2003 (Exhibit 4). The EIR evaluated five alternative configurations for the project, as well as the no project alternative. After evaluating the environmental effects of each alternative in light of the project goals, the City found that the preferred alternative (Alternative 5) would maximize the opportunities for beach restoration while minimizing impacts to the active shoreline and coastal access and recreation. This alternative would meet a majority of the project objectives while minimizing potential environmental impacts. On July 21, 2003, the City certified the EIR, adopted the preferred alternative and the mitigation and monitoring plan for the project. (Exhibit 5).

The EIR identified the following impacts, which as mitigated would be less than significant (see Table S-1 *Summary of Environmental Impacts and Mitigation Measures*, page S-5 of the EIR for a full summary of mitigation measures):

A. Biological Resources

1. Construction activities could result in the temporary resuspension of nearshore sediments, thereby turbidity. These impacts are expected to be minor and local in nature, and thus, be *less than significant*.

Mitigation Measure: Although no impact to the marine biota or habitats is expected, performing construction activity within the tidal zone during winter, daytime low tides would reduce the resuspension of sediments in the lower intertidal areas.

2. Removal of landscape trees and shrubs may potentially impact nesting birds. No sensitive bird species have been identified in the area, which is not considered critical habitat, thus the impact would be *less than significant*.

Mitigation Measure: Prior to construction activities and removal of landscape trees and shrubs from the parking lot and the north side of Shoreline Drive, surveys will be conducted to determine the presence or absence of nesting birds. In addition, pre-construction surveys will be conducted over the entire project impact area to determine the presence or absence of sensitive animal and plant species. If a listed species and/or critical habitat is located in the area of potential impact, early consultation with the California Department of Fish and Game and the United States Fish and Wildlife Service.

B. Air Quality

1. Grading activity and movement of cobble material could temporarily increase fugitive dust. Because the Ventura County Air Pollution Control District has not adopted impact thresholds for temporary construction related emissions, such impacts are *less than significant*.

Mitigation Measures: During clearing, grading, earth moving, or excavation operation,

excessive fugitive dust emissions shall be controlled by regular watering, paving construction roads, or other preventative measures as described in the EIR.

2. Construction activity associated with the proposed project would generate a temporary increase in emissions of ozone precursors (nitrogen oxides and reactive organic compounds) due to the use of heavy construction equipment. Because the Ventura County Air Pollution Control District has not adopted impact thresholds for temporary construction-related emissions, such impacts are considered a *less than significant impact.*

Mitigation Measure: Construction related emissions shall be controlled through the use of maintenance of construction equipment, use of low-sulfur fuel, truck scheduling and discontinuance of construction activities during second-stage smog alerts, as detailed in the EIR.

C. Parking, Beach Access, and Recreation

1. During the construction phase of the proposed project there would be a temporary loss of vehicular, bicycle and pedestrian access to the area. This is considered a *significant but mitigatable* impact.

Mitigation Measures: The project contractor and the City shall develop a Traffic Control Plan to control construction traffic and circulation within the Shoreline Drive corridor during the construction period.

2. During the construction phase of the proposed project there would be a temporary loss of beach parking. This is considered a *significant but mitigatable* impact.

Mitigation Measures: A Parking Management Plan will be developed by the Fairgrounds to provide temporary parking for beach users during the period when the beach parking lots are removed/repaired and the replacement parking has not been finished. The Plan shall also identify parking areas for construction workers and staging areas for equipment.

D. Archaeological Resources

1. During the construction phase of the proposed project, it is possible that as yet unknown buried archaeological resources could be disturbed. This is considered a *significant but mitigatable* impact.

Mitigation Measures: A professional archaeologist shall be onsite to monitor ground disturbance if excavation extends below existing fill into native soils. The archaeologist shall have the power to temporarily halt or redirect project construction in the event that potentially significant cultural resources are exposed, as specified in the EIR. A monitoring report shall be prepared upon completion of construction if an archaeologist is needed.

E. Aesthetics

1. During the construction phase of the proposed project landscaping along Shoreline Drive will be disturbed. This is considered a *less than significant impact.*

Mitigation Measure: Landscape trees and shrubs along Shoreline Drive during construction will be replaced with appropriate landscaping as part of the final project design.

The Conservancy acts as a responsible agency under CEQA for this project pursuant to 14 Cal. Code of Regulations §15096. Pursuant to its responsibilities under 14 California Code of Regulations, Section 15091, Conservancy staff has independently reviewed the City's EIR and concurs in the City's finding that the project avoids, reduces or mitigates the possible significant environmental effects to a level of insignificance. Staff further recommends that the Conservancy find that there is no substantial evidence that the project, as designed, has the potential to have a significant adverse effect on the environment. Upon approval, staff will file a Notice of Determination for the project.