

**CALIFORNIA COASTAL COMMISSION**

SOUTH CENTRAL COAST AREA  
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VENTURA, CA 93001  
(805) 585-1800



21 November 2016

**GEOTECHNICAL REVIEW MEMORANDUM**

To: Megan Sinkula, Coastal Program Analyst  
From: Mark Johnsson, Staff Geologist  
Re: Emprise Trust

In connection with the above-referenced permit application before the City of Santa Barbara, I have reviewed the following document:

Cotton Shires and Associates, 2016, "Response to Geotechnical Review Memorandum from Mark Johnsson, Coastal Commission Staff Geologist to Megan Sinkula, Coastal Program Analyst dated August 9, 2016 re: 1925 El Camino de la Luz, Santa Barbara, California", 7 p. letter dated 23 August 2016 and signed by P. O. Shires (GE 770) and J. M. Wallace (CEG 1923).

This letter is a response to my earlier focused review dated 9 August 2016. The 23 August 2016 letter by Cotton Shires and Associates ("CSA letter") paraphrases much of my review, asserts that the Norberg (Coastal Development Permit 5-09-105) bluff edge location example provided in my memo does not apply to the situation on the subject site, and states that my assertion that the subject landslide has shown only "minor movement" is incorrect. Instead, the CSA letter states that slope inclinometers on the project site show only "apparent upslope tilt." Notwithstanding the validity of either claim, this portion of the CSA letter provides no pertinent new information for consideration. The arguments raised by the CSA letter do not change my opinion concerning the location of the bluff edge on the subject site.

The next section of the CSA letter provides a critique of my interpretation of the section of the California Code of Regulations that addresses bluff edge delineations (CCR Title 14 § 13577 (h) (2)). To this critique, I can only say we must agree to disagree. I believe that my interpretation of the bluff edge at the subject site is consistent with Section 13577 (h) (2) and with all of my previous bluff edge determinations made over my 16 years of tenure as the Commission's staff geologist.

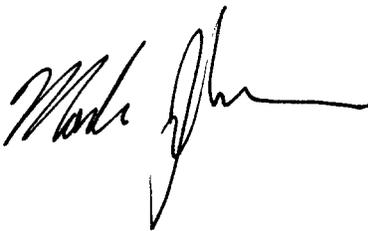
Finally, the CSA letter draws parallels between the subject site and a large landslide at the Ocean Trails Golf Course, Rancho Palos Verdes, a project that I worked on in a review capacity (the firm of Cotton Shires and Associates consulted for the City in a review capacity). The CSA letter presents a figure with an identified "top of coastal bluff edge" and notes that reconstruction of the 18<sup>th</sup> hole was allowed landward of this point. I believe that the parallels are imperfect; and in any case, the identified "top of coastal bluff edge" was never explicitly accepted by the Commission. I believe that I would have made a determination far landward of this point, however I was never asked to make a bluff edge delineation at the Ocean Trails Golf Course site. The allowed reconstruction, which was intended to repair and protect an existing facility and

facilitated extensive public access improvements, is not a proper analog for the permitting of a new single family home that is on a bluff face and partially on a recent landslide.

To summarize, the cited CSA letter provides no new information regarding the subject site, draws an imperfect analogy, and largely records a difference of opinion on the proper interpretation of the California Code of Regulations concerning bluff edge delineations. The recommendation in my 9 August 2016 memorandum remains unchanged.

I hope that this review is helpful. Please do not hesitate to contact me with any further questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark Johnson", with a long horizontal flourish extending to the right.

Mark Johnson, Ph.D., CEG, CHG  
Staff Geologist