

Midcoast Community Council

An elected Advisory Council to the San Mateo County Board of Supervisors

representing Montara, Moss Beach, El Granada, Princeton, and Miramar

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Date: January 13, 2021
To: Theresa Engle, SMC DPW Resource Specialist
Cc: Supervisor Don Horsley,
Jim Porter, Director, Department of Public Works
Erik Martinez, California Coastal Commission Staff
From: Midcoast Community Council
Subject: Comments: Initial Study / Mitigated Negative Declaration for Mirada Road Pedestrian Bridge Replacement and Bank Stabilization Project (NegDec)

Overall Considerations

Following fast response actions in the Medio Creek area addressed with emergency CDPs, San Mateo County (SMC), in June, 2020, submitted to the California Coastal Commission (CCC) a CDP request for the Medio Bridge Replacement project (“the Project”). As stated in the background section of the NegDec, the Project is only the initial step in a larger framework:

The County has evaluated its portion of Mirada Road immediately north of the proposed project area and it appears that a long-term project will be necessary to address coastal erosion along Mirada Road. County funding has not been allocated to address these improvements, which have been identified as sheet pile walls from Magellan Avenue to Medio Avenue to protect the roadway. ... The County anticipates that a long-term project to address coastal erosion along Mirada Road will not be constructed before 2021/2022.

With this larger framework in mind, these comments on the NegDec for the CDP recognize that the “sheet pile wall” referred to in the above paragraph is an approach to coastal protection that is consistent with the armoring proposed for this Project. It is important to understand the fuller plans for this stretch of coast in order to conduct a thorough assessment of the impact of the armoring proposed for this bridge replacement Project over the next 20 years.

While climate change and coastal erosion are important factors currently impacting this area, the impact of the Harbor Jetty, first deployed in Pillar Point Harbor in 1959, has been a key factor driving coastal erosion in this part of Half Moon Bay.

The proposed Project has strong support from many in the Miramar community, protects road access to several properties and provides an efficient and scenic California Coastal Trail route by the bay that has been extremely popular with visitors as well as residents.

The NegDec provides a static description of the armoring proposed, a composite of shotcrete and RSP on the shoreline cliff and creek walls, but it does not provide an assessment of coastal erosion and sand patterns over the next 20 years and beyond. (Note: There is a 2018 study for Mirada Road armoring.) On January 20, the MCC expects to receive a draft of Connect the Coastside with a plan framework to address coastal trails and roads impacted by the shoreline for the communities of El Granada and Miramar for the next 20 years. The MCC would like to work with both San Mateo County and support from the CCC to bring further information on these factors to a meeting in early February.

The MCC comments on the NegDec document are below.

Environment Evaluation Comments

A. Aesthetics

The combination of Shotcrete and RSP creates a view that will vary considerably by season which is acknowledged. There are simulations which show the appearance when the sand is at a high level (2 feet visible), **but no simulations show the appearance when the full RSP is visible which is a concern to assess the aesthetics of the view** and the actual extent of the RSP base. Further, it can be expected that over time RSP will spread out from their initial position below the shotcrete, and will be moved away from the wall by storm waves.

We therefore think that A.1.a,b, and c should be Significant impact, rather than Insignificant.

G. Geology and Soils

The Project cannot be approved without an agreed analysis of the sand movement attendant to the project site. The statement on page 48, item b) that: "The County and City of Half Moon Bay will work with the CCC to determine if a net sand loss may be balanced by the overall benefits of the project to existing coastal resources and retain and restore the connectivity of the coastal trail over Medio de Arroyo" cannot be left as an item to be determined. It must be evaluated and finalized in this document or in attachment from an expert party in order for a Negative Declaration to be valid. Sand Analysis of Coastal Beach Sand projects is out of date and should be reviewed. Analysis of deposition of materials brought to the coast by Medio Creek should be considered. The SMC Harbor District will conduct a sand replenishment project, Surfers Beach Sand Replenishment Project and it should be referenced. The liquefaction analysis mentioned on pages 47-8 is omitted from the NegDec.

We therefore think that G.7.b should be Significant impact, rather than insignificant.

P. Recreation

The ramp proposed for providing heavy equipment access to the beach will prevent beach access using the informal trail in the same location, during the construction period. Construction will also prevent use of the well-used section of the beach adjacent to the existing bridge. When the Project is completed there will be no formal trail to the beach and informal access will be impossible where there is shotcrete without adding a staircase to the beach.

We therefore think that the Recreation impact is Significant, rather than insignificant.

Q. Transportation

Providing coastal trail continuity has resulted in a detour to the Medio Creek area of SR1, which is an inconvenience to trail users and a safety hazard for trail users and residents because of the mix-mode traffic that results. We have received complaints of near accidents from residents.

We therefore think that Q.17.a should at least require additional mitigation; as is, the impact of the preliminary detour and the project is Significant.

S. Utilities and Service Systems

All utility districts are working to be ready for cut over to the bridge in summer, although the NegDec does not mention this (a surprising omission). In particular, GCSD has plans to abandon their sewer lines crossing Medio Creek. This area should be monitored closely.

We agree that utility impact is less than significant.

U. Mandatory Findings of Significance

Re-stating the points made in the opening paragraphs:

The overall assessment of erosion at creek and on the adjacent shoreline is not adequately addressed. Until this consideration is added to the NegDec, this must be considered a Significant impact, precluding CCC approval of the Project.

Additionally, as stated above, the MCC believes that there are significant impacts from this project on Aesthetics, Geology, and Recreation.

MIDCOAST COMMUNITY COUNCIL
s/Michelle Weil, Chair