



July 19, 2010

Mike Schaller, Project Planner
San Mateo County Planning and Building Department
455 County Center, Second Floor
Redwood City, CA 94063

Re: Initial Study and Negative Declaration for PLN 2010-00093: Fitzgerald Marine Reserve/Preserve beach access improvements at Nevada and North Lake Street and improvements to the Dardenelle Trail/California Coastal Trail between North Lake Street and Cypress Avenue

Dear Mike,

Thank you for sending the above-referenced Initial Study and Negative Declaration to the Committee for Green Foothills (CGF). On behalf of CGF, I am submitting the following comments:

The setting for this project is the Fitzgerald Marine Reserve/Preserve. This biologically sensitive area has regional, state, and national significance, as recognized by:

- Inclusion within the Monterey Bay National Marine Sanctuary and the Gulf of the Farallones National Marine Sanctuary (which have joint responsibility for management of resources below the average high tide line)
- Inclusion within the boundary of the Golden Gate National Recreation Area
- Designation as a Marine Life Refuge under the State Water Resources Control Board's designation as an Area of Special Biological Significance (ASBS)
- Inclusion within the Central California Coast International Biosphere Reserve, as part of the Man and the Biosphere Program of UNESCO
- Designation as a California Critical Coastal Area (CCA), a multi-agency collaborative effort to focus efforts on reducing non point sources of polluted runoff to our coastal waters

The May, 2002 Master Plan for the Fitzgerald Marine Reserve recognized these remarkable natural resources, through its guiding principles:

"The fundamental concept underlying the Master Plan is that protection of the outstanding natural resources of the Fitzgerald Marine Reserve will require a new approach to management of ecological systems and visitors in future years, and that the best way to accomplish this goal is to emphasize the sensitivity of the resource, to enhance the educational value of the Reserve, to manage visitation, and to limit use of the Reserve as a recreation destination."

Given this context, and the scenic qualities that exist along the trail now, CGF believes that several components of the project, as currently designed and located, do not protect the natural resources, nor do they enhance the educational value of the Reserve and the visitor experience. In fact, they would degrade the visitor experience. More specifically:

Coastal Trail: The Dardenelle Trail/Coastal Trail as proposed, would be an overblown paved transportation facility that does not invite people to enjoy and appreciate the natural setting, and connect with nature. This trail is proposed to be ten feet wide, with asphalt surface, plus two-foot wide aggregate shoulders on each side of the trail. The width is being justified as necessary to comply with ADA requirements. Compliance with ADA does not need to be wider than three to four feet, nor does ADA require an asphalt surface. A more appropriate design that fits with the natural setting would be a more modest width with wider areas or turnouts along the way so people can step aside, stop and look more closely at the view, and discover what's growing and living next to the trail. An over-wide trail that will be used by a variety of users (walkers, cyclists, equestrians, and people with impaired mobility or in wheelchairs) can actually create dangerous conditions since different user types will travel at different speeds. The existing trail is eight feet wide in the southern section, and becomes mostly six feet wide with some areas four feet wide. The primary work should be done to improve the surface where roots protrude, and carefully address the impacts of surface water runoff, as it flows across the trail from the slope above.

Bridge over San Vicente Creek: It is not clear why the bridge over San Vicente Creek needs to be moved upstream. The proposed new location will create greater impacts to riparian vegetation, as well as to an archaeological site. A better alternative that would minimize impacts would be to replace the bridge in its current location. The bridge's width (12 feet) should be reduced for the same reasons for reducing the width of the Coastal Trail.

Beach Access: The proposed beach access component of the project would replace the existing access trail, overlook, and rustic wooden steps to the beach with a new asphalt surfaced 10.5 foot wide trail with three foot wide aggregate shoulders on either side and up to six foot high retaining walls, plus two overlooks and stairs to the beach. The demolition plans show removal of existing boulders below the ordinary high water and high tide line, and installation of much more extensive rip-rap along the southern and western end of the access trail overlook. A seasonal bridge crossing San Vicente Creek would be located at the bottom of the rip-rap on the beach as well as a portion of the stairway ending on the beach below the high tide line. Locating the base of the stairs within the zone of tidal action places them at risk of damage or destruction from storm events.

Drainage: The plans do not provide details as to how and where the additional runoff and drainage from the graded surfaces and asphalt paved areas will be discharged - onto the beach? - or into the rip-rap?

Trail Surface: The Fitzgerald Marine Reserve Master Plan (page 60) specifies: "all trails and paths ...shall be surfaced with pervious materials such as decomposed granite". At a presentation to Coastal Conservancy staff in July, 2009 by Jason Spann, Accessible Trails Coordinator, and Associate Landscape Architect for State Parks, use of pervious surface materials such as compacted native soil, compacted aggregate when native soils are not firm/stable, compacted road base, or

decomposed granite, can provide a firm and stable surface that meets ADA trail surface requirements, while providing a more natural and aesthetically pleasing surface. Pervious surface materials would also be consistent with the various state and federal regulations governing non-point source pollution and surface water runoff; asphalt would not.

Need for mapping of ESHA: The Initial Study and Negative Declaration do not adequately depict the proposed improvements and their relationship to environmentally sensitive habitat areas (ESHA). The proposed bridge across San Vicente Creek, for example, is recognized as impacting ESHA, yet the aerial extent of this ESHA is not mapped. Rather the Existing Conditions and Demolition Plans state that existing biological communities adjacent to the trail will be “georeferenced prior to... final construction documents”, and “impacts associated with trail alignment to be minimized”. Neither the public nor decision makers can properly evaluate impacts that are not mapped.

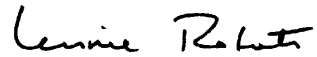
Need for evaluating the project for consistency with LCP: The Initial Study and Negative Declaration have not evaluated the proposed project for consistency with the San Mateo County Local Coastal Program (LCP): A project is deemed to have a significant effect on the environment if it will: “Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan...) adopted for the purpose of avoiding or mitigating an environmental effect.” (CEQA Guidelines).

The LCP is the applicable and more specific General Plan component that guides development in the Coastal Zone. The applicable policies of the LCP include (but are not limited to): Sensitive Habitats Component Policies 7.1, 7.3, 7.4, 7.7, 7.9, 7.11, 7.12, 7.13, 7.14, 7.16, 7.17, 7.18, Visual Resources Component Policies 8.4 and 8.5, Recreation/Visitor Serving Facilities Component Policies 11.4, 11.12, 11.13, 11.18, and Appendix 11.A regarding Natural Preserve Planning and Management Guidelines. The proposed project must be analyzed for conformance with these policies.

CGF believes that the project, as proposed, cannot be found in compliance with the LCP policies protecting sensitive habitats, particularly wetlands, as trails are not allowable uses in these ESHAS. For the Dardenelle/Coastal Trail, there are wetlands adjacent to a section of the existing path (on both sides) about two thirds of the way between Cypress and North Lake Street as evidenced by the presence of Rushes (*Juncus* spp). The proposed improvements to the Dardenelle Trail/Coastal Trail must be revised to avoid destruction of wetlands in this area. Maintaining the trail’s four to six-foot width without impacting adjacent wetland vegetation in this section as well as throughout this trail, with turnouts for people to stop and view their surroundings, could be found in compliance with the LCP, would be the most environmentally protective alternative, and would provide a fitting “walk in the woods” for visitors, whether they are using their feet, a bicycle, a wheelchair, or a horse.

Thank you again for the opportunity to comment. We look forward to working with County Parks and Recreation, Planning, and other interested parties to modify this project so it can better fit with its natural setting, and comply with the LCP.

Sincerely,

A handwritten signature in black ink that reads "Lennie Roberts". The signature is written in a cursive, slightly slanted style.

Lennie Roberts, Legislative Advocate
Committee for Green Foothills

Cc: Rich Gordon, Supervisor, Third District, San Mateo County
Dave Holland, Director, San Mateo County Parks
Sam Herzberg, Senior Planner, San Mateo County Parks
Julia Bott, San Mateo County Parks Foundation
Tim Duff, California Coastal Conservancy
Ruby Pap, California Coastal Commission
Fran Gibson, Coastwalk California
Len Erickson, Volunteer Coordinator, Midcoast Parks and Recreation
Neil Merrilees, Chair, Midcoast Community Council
Other Interested Parties