

CALIFORNIA COASTAL COMMISSION

## CENTRAL COAST DISTRICT

701 OCEAN STREET, ROOM 310

SANTA CRUZ, CA 95060

(408) 426-7390



March 9, 1989

RECEIVED

MAR 13 1989

DONALD F. GULUZZY  
GENERAL MANAGER  
S.M.C.H.D.

Don Guluzzy, Harbor Master  
Pillar Point Harbor District  
#1 Johnson Pier  
Half Moon Bay, CA 94019

Re: Draft EIR, Pillar Point East  
Harbor Master Plan

Dear Mr. Guluzzy:

Thank you for the opportunity to review the Draft Environmental Impact Report for the Pillar Point East Harbor Master Plan prepared by Earth Metrics, Inc., February, 1989. Coastal Commission staff offer the following comments:

1.3 Project Characteristics, pg. 1-4 through 1-9

This portion of the E.I.R. describes the project analyzed in the document. Staff understands that the East Harbor project will be implemented in phases over the next several years. Certain portions of the over-all project (i.e., additional commercial/restaurant space, fish processing facility) are subject to current constraints such as the non-availability of water if they were planned for construction in an early phase. Other portions of the project, i.e., public access improvements required as a condition of previous Commission approvals for the harbor district can not be displaced by new development without being mitigated. In order to accurately evaluate the impacts of the project, a clear, detailed description of the phasing program is needed. A.1

Staff notes that some of the development proposed by the project description is not discussed or discussed inadequately in the E.I.R. Improvements proposed on the east side of Highway 1 fall generally in this category. The issue of private ownership of some of the areas proposed for development must also be addressed. Legible graphics would be useful, the ones contained in E.I.R. are difficult to read because they have been so greatly reduced. A.2

On page 1-7, the text indicates that the Master Site Plan is conceptual. If this is the case, what type of permit will be sought -- concept approval or an actual development permit? If a development permit will be sought based on this E.I.R., how will CEQA requirements be dealt with if components of the project change? (e.g. supplemental/addendum to E.I.R. - describe for each phase). A.3

The discussion on page 1-8 indicates the size of some of the development proposed in the Master Plan. A table indicating the size of all of the proposed and existing buildings, parking areas and landscaped areas would be A.4



helpful in evaluating the proposal. Staff notes that the square footage of the fish processing building must be in error. A description of the amount, location and type (cut/fill) of grading is also needed. Clear graphics, including relevant cross-sections, which illustrate proposed grading, bulkhead construction, indicate existing contours and mean high tide lines would greatly aid in the understanding and evaluation of the proposal. A.5

1.5 Regulation and Permit Requirements, pgs. 1.9 through 1.15

River and Harbor Act of 1899 pg. 1-11. The E.I.R. indicates that Army Corps certification must be consistent with the San Mateo LCP. The San Mateo LCP governs land use and is the appropriate standard for on-shore development proposals. For development proposed below the mean high tide line however, the Coastal Commission retains original permit jurisdiction and therefore the applicable policies of the Coastal Act are the appropriate standards for this type of development. A.6

State Lands Commission, page 1-13

The last paragraph seems contradictory. What areas of the harbor, below the MHW have been granted to the Harbor District? What is the effect of such a grant? This paragraph seems to indicate that land below the MHW has been granted to the district yet a permit will still be required from State Lands, please expand and clarify this section. A.7

2.2 Alternatives Evaluated, pg. 2-1, paragraph 6

The E.I.R. indicates that a multi-level parking structure may be an alternative but would not be visually obtrusive. There is no analysis to support this conclusion. Please discuss. A.8

Table 2-1, Summary of Mitigation Measures, pg. 2-2 through 2-16, 3-1 Land Use/Planning pg. 2-2

The proposed mitigation for the Fish Handling Facility and dry boat storage (obtain a variance from County height standards) is totally inadequate. A variance will certainly not mitigate the visual impacts of these very large structures. Appropriate mitigation may include re-design of the buildings or re-location of these uses to a less visually sensitive location. Please analyze and discuss measures that would adequately mitigate the identified, significant impact on visual resources. Additionally the E.I.R. provides no justification for the size of these buildings nor the rationale for their locations. The final E.I.R. should detail all uses and operational needs of these facilities. A.9  
A.10

3.3 Visual/Aesthetics, pg. 2-7

What are the policies and recommendations of the Architectural Design Guidelines for the Pillar Point Conceptual Plan? What types of landscaping will mitigate visual impacts? What locations? Staff notes that the near shore location significantly constrains the plant species that can be successfully grow in this area. In addition, landscaping improperly placed may, in itself, block coastal views from public viewing areas. Please discuss. A.11  
A.12



3.4 Biology, pg. 2-7 through 2-11

The amount of fill may be underestimated. It appears that some fill will also be required to construct the bulkhead area proposed adjacent to the pier. Please re-calculate. The proposed mitigation is inadequate because it is not sufficient in area and the relevant components have been put off to an uncertain date. Please expand and discuss. A.13

Construction of the sedimentation pond and creek alterations are subject to the standards of the San Mateo County LCP, Section 7, Habitats. Please identify and review the appropriate policies and discuss. In addition to habitat mitigation, it would seem that the pond may present some health and safety issues which should be analyzed and mitigated. A.14  
A.15

3.8 Public Services, pg. 2-12

The E.I.R. indicates that increased water use can be mitigated by entering into negotiations with CCWD for the purchase of water. CCWD does not have any water to sell at the moment and thus negotiations will not adequately mitigate that situation. Adequate mitigation might include the phasing of development which would allow non or very low water using components of the project to move forward first, leaving the more water intensive components to later phases when CCWD, because of their projects (Crystal Springs Pipeline, Pillarcitos West pipeline) may have water to sell the district. Please discuss. A.16

3.1 Land Use and Planning, pg. 3-1 through San Mateo County Local Coastal Program pg. 3.1-5 through 3.1-7

The LCP policies relevant to Public Works, Habitats, Hazards and Visual Resources are also applicable to this project. Please include. An analysis of how this project meets (or does not meet) the intent of applicable LCP policies is essential since all development above the MHT will require Coastal Development Permits from San Mateo County. A.17

Impacts pg. 3.1-10 thru

Staff notes that many of the proposed public access requirements which are to mitigate the loss of beach are already required as a condition of permits granted in the past to the Harbor District by the Coastal Commission. Please clearly identify those access improvements which are not already required and then identify mitigations for the improvements which will be replaced by new development. A.18

Access Constraints, pg. 3.1-13

In a recent permit action, the Coastal Commission obtained an offer of dedication for a vertical beach access from Highway One to the beach through the site of the Anchorage and Moon Garden Restaurant. The Harbor District indicated they would be interested in taking the offer. Please discuss how this relates to the project. A.19



Proposed Buildings Exceed Maximum Height, pg. 3.1-14

Please see comments regarding Table 2-1, pg. 2.2

The analysis of the visual impacts of these structures both here and in the Visual Resources Section of the E.I.R. is inadequate and should include, at a minimum, analysis of the impact on the character of the area (how do the buildings relate in scale and design to existing and desired design characteristics of the area), impact on views from Highway One as demonstrated by graphics and cross sections.

A.20

Conformance with the County General Plan and LCP, pg. 3.1-14

This is an inadequate and cursory discussion of a few of the many LCP policies applicable to this project. Please see previous comments regarding 3.1 Land Use and Planning.

A.21

3.2 Traffic and Parking, pg. 3.2-1 through 3.2-19  
Parking Requirements, pg. 3.2-16 and 17

The E.I.R. indicates that the parking supply proposed by the project falls short of that needed to support the new development. In an earlier section of the E.I.R. (pg. 3.2.6), it is noted that existing parking is sometimes inadequate to serve the current demand. Given this situation, it is unclear why parking ratios well below the requirements of San Mateo County continue to be assumed (i.e., county requires one space per 3 seats in a restaurant -- parking study indicates one space per 6 seats will be sufficient). It is also unclear where the new parking areas will be located. Staff notes that the plans show parking areas sited on land which is not owned by the Harbor District. Please discuss. The mitigation proposed to address inadequate parking is an appropriate concept but should be strengthened.

A.22

A.23

3.3 Visual/Aesthetics, pg. 3.31 to 11

Please see earlier comments on this issue.

3.4 Biology, pg. 3.4.1 to 13

Please see earlier comments. In general, more work is needed to define an adequate mitigation plan for each development phase (eg. boat launch ramp, pier & docks, etc.), and to clarify the amount of fill which is proposed. Any impacts associated with covering additional areas of water with decking should also be discussed. Staff notes that the E.I.R. addresses the issue of turbidity caused by the installation of new piers, however the constituents of the disturbed sediments are not discussed. Often these sediments near existing wharves will include concentrations of toxic materials which, when disturbed, may affect marine life. Please discuss.

A.24

A.25



Don Guluzzy, Harbor Master  
March 9, 1989  
Page 5

3.5 Geology, 3.5.1 through 3.5.5

Limiting Shoreline Structures, pg. 3.5.2

Staff notes that diking or filling of coastal waters, which include bulkheads, may only be constructed to serve existing development or coastal dependent projects and only where there are no feasible less environmentally damaging alternatives. The development proposed adjacent to the existing pier and which requires the construction of a bulkhead, does not meet the definition of coastal dependent development as set forth in Section 30101 of the Coastal Act.

3.6 Drainage/Hydrology/Water Quality, pg. 3.6.1

Please see earlier comments regarding alteration of El Granada Creek and construction of sedimentation pond.

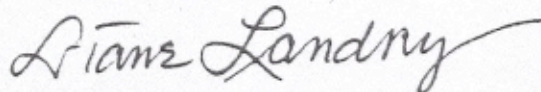
3.7 Public Services

Please see earlier comments regarding water availability.

In summary, many of the concepts outlined in the E.I.R. appear to be consistent with the Coastal Act. No doubt, improvements to Pillar Point Harbor would significantly increase recreational opportunities for the public, encourage commercial fishing and augment public access to the shoreline. Additional work is, however, needed to ensure that the final project components are consistent with planning policies. Thank you again for the opportunity to comment on this proposal.

Very truly yours,

DAVID LOOMIS  
Assistant District Director



DIANE S. LANDRY  
Coastal Planner

DL/DSL/cm

3258A