

**CALIFORNIA COASTAL COMMISSION**

NORTH CENTRAL COAST DISTRICT OFFICE  
45 FREMONT STREET, SUITE 2000  
SAN FRANCISCO, CA 94105  
PHONE: (415) 904-5260  
FAX: (415) 904-5400  
WEB: WWW.COASTAL.CA.GOV



August 28, 2014

Peter Grenell  
400 Oyster Point Blvd.  
Suite 300  
South San Francisco, CA 94080

AUG 29 '14 13:44

**Subject: Coastal Development Permit (CDP) Application Number 2-14-1340 (Pillar Point Harbor West Trail Culvert Repair Project in Half Moon Bay, CA)**

Dear Mr. Grenell:

We received the above-referenced coastal development permit application that you submitted on July 31, 2014. The proposed project includes repairs and enhancements to the West Trail consisting of replacement and construction of a new culvert and associated conveyances, construction of a soldier pile wall, placement of rock slope protection, and related excavation and fill. We have reviewed the materials that you have submitted to date and are in need of additional information to adequately analyze the proposed project for Coastal Act conformance. Towards this end, we are unable to file this application until the following is submitted:

1. Erosion Analysis and Description of Project Alternatives. A key component of the proposed project is the placement of rock slope protection and construction of a soldier pile wall to protect the (proposed) replaced culvert and trail in that location from erosion. However, the project materials do not include a detailed analysis of the past and current erosion at site, nor is there any consideration of the potential for future sea level rise impacts. Please submit an analysis that clearly identifies erosion hazards in the area both as they currently exist and how they may impact the site in the future given sea level rise. Please also include an analysis of potential alternatives to the proposed project. This analysis should include, at a minimum, the following:
  - a) Please describe the need for both the rock slope protection and the soldier pile wall in this location (i.e. as opposed to one or the other). Please also include an analysis of the potential for these structures to result in increased erosion to adjacent areas.
  - b) Consideration of alternative measures including a “no project” alternative (i.e. a project that only includes replacement of the culvert and the associated repairs and enhancements but that does not include any shoreline protective structures) as well as possible “soft” solutions (i.e. nourishment or placement of dredged materials or use of a “living shoreline”).
  - c) A description of the potential resource impacts and effectiveness of each alternative (including the rock slope protection and wall identified as the proposed alternative in the project application). This description should include consideration of both current conditions and the potential for sea level rise.

**Peter Grenell, San Mateo Co. Harbor District**  
**2-14-1340 (Pillar Point Harbor West Trail Culvert Repair Project)**  
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2. Revised Construction Timeline. The project details state that construction will occur prior to the onset of the rainy season on October 15 so as to avoid potential for water quality contamination from runoff and to avoid potential California red-legged frog dispersal events. Given that you submitted this CDP application on July 31<sup>st</sup> and it is currently incomplete, it seems unlikely that you will be able to obtain your CDP and complete construction before October 15, 2014. Therefore, please submit a revised project timeline that includes any additional measures necessary to protect water quality and avoid impacts to the California red-legged frog.
3. Other Agency Approvals. The proposed project includes the placement of 205 square feet of fill (the proposed rock slope protection and soldier pile wall) into jurisdictional waters. Please provide us with any approval obtained from State Lands Commission or US Army Corps of Engineers, or updates on approval requirements, when they are available.
4. Reduced and Electronic Copies. Please provide copies of the project plans that have been reduced to 8 ½ x 11" in size. Please also submit electronic copies of the project materials.
5. Inconsistencies in Application. Item 8 on page 3 of the application says that no grading is proposed for the project. However, Keynote 3 on item 2 of drawing C-501 refers to grading of the hillslope. Please clarify this discrepancy.

We will hold your application for three months from today's date (i.e., until November 28, 2014) pending receipt of these materials. After all of the above-listed materials have been received, the application will again be reviewed and will be filed if all is in order (Government Code Section 65943(a)). Please submit all of the requested materials at the same time. Please note that there may be additional materials necessary for filing purposes depending upon the nature of the information provided pursuant to the above-listed materials. If all of the above-listed materials are not received within three months, application number 2-14-1340 will be considered withdrawn and will be returned to you. This submittal deadline may be extended for good cause if such request is made prior to November 28, 2014.

If you have any questions regarding the application, please contact me at the address and phone number listed below.

Sincerely,



Kelsey Ducklow

NOAA Coastal Management Fellow  
California Coastal Commission  
45 Fremont Street, Suite 2000  
San Francisco, CA 94105  
415.904.2335  
kelsey.ducklow@coastal.ca.gov