

April 7, 2013

Item Th.6  
Oppose Waiver

Chair Mary Shallenberger, and Commissioners  
California Coastal Commission  
45 Fremont Street, Suite 2000  
San Francisco, CA 94105

**Re: Coastal Development Permit (CDP) Waiver 2-12-012 – W**

Dear Chair Shallenberger and Commissioners,

I am writing to object to the granting of the proposed Waiver, which would allow placing 5,600 cubic yards of material on an existing recreational beach at Pillar Point Harbor without a Coastal Development Permit. Reducing beach access permanently for an ongoing dredge process is unnecessary, and reducing it without mitigation would be inconsistent with the Public Access and Recreational Policies of the Coastal Act.

1. If the waiver is granted, a rare section of beach that has long provided beach access for group activities will be lost permanently, with no mitigation. Gatherings of kayak clubs, outrigger canoe races, sailing regattas, paddleboard races and large water based recreation group activities will become difficult or impossible without this large staging beach.
2. There is no longer time pressure for the dredging. Salmon Season opened with 3 usable launch lanes at low tide, and 3 more lanes that could be usable at high tide. In addition, district staff has had 6 years to apply for a permit and consider alternate disposal sites since the last dredging at this site in 2006.
3. Three of the 6 available launching lanes are currently completely usable at the lowest tides (over 5' deep at a .2 low tide). The remaining three lanes could be made usable with much less dredging than is being proposed. By removing only what is necessary for boat launching, the lesser amount of sand (1-2000 cubic yards) could be placed on Perched Beach with no negative effects to beach access.
4. While the proposed waiver infers that the sand on Perched Beach will be temporary ("the Applicant is committed to seeking alternative dredge material disposal sites") there are no conditions in the waiver that require restoration of the lost beach access. The proposed sand placement follows the exact outline of Harbor District plans for a parking lot, behind a sheet pile bulkhead, as part of the Pillar Point Harbor general plan, making it possible that the dredge placement is to facilitate future development, as much as clearing of the launch ramp.
5. Many alternate disposal sites exist, and have been proposed by residents, and local governmental groups (including the Coastal Commission Staff at a community meeting in 1997 discussing the Princeton waterfront). To date, no permits for

alternate sites have been applied for. While staff at the Gulf of the Farallones Marine Sanctuary has stated publicly (HMB Review 1/17/13) that they would welcome an application to place sand on Surfer's Beach, no permit has been applied for. While there is currently a study underway by the Army Corps, that study is not for, or required by the Gulf of the Farallones Marine Sanctuary. The requirements necessary for an approved GOFMS permit, will likely be determined only after the permit is applied for. That process has not been started.

Coastal beach access is important. There are many alternatives to this plan, none of which require the loss of coastal access. Please deny the Waiver so the application can be processed as a regular Coastal Development Permit application.

Sincerely,

Neil Merrilees