

Comments

Responses

Cc: California Coastal Commission
725 Front Street
Santa Cruz, CA 95060
Attention: Dan Carl

Jan Beautz, Supervisor
Santa Cruz County
Board of Supervisors
701 Ocean Street
Santa Cruz, CA 95060



surfrider foundation, santa cruz chapter
conservation activism research education

Comments

June 22, 2006

Claudia Slater
Santa Cruz County Planning Department
701 Ocean Street, Room 400
Santa Cruz, CA 95060

Re: DEIR/DEIS for East Cliff Drive Parkway and Bluff Stabilization Project

The Santa Cruz Chapter of the Surfrider Foundation, a non-profit environmental organization dedicated to the protection and enjoyment of the world's oceans, waves, and beaches for all people through Conservation, Activism, Research, and Education, submits the following comments on the above referenced DEIR/DEIS.

O3-1 We find the document inadequate and incomplete in analysis of feasible project alternatives and failing in attention to critical loss of public beach and public access on public property seaward of the proposed seawall. We feel these issues must be publicly acknowledged, thoroughly analyzed, and be given full and valid consideration in public documents and the decision-making process. Therefore, we urge you to revise the DEIR/DEIS in accordance with these comments and to make it available for public review.

General comments:

- O3-2 1) **A broad range of reasonably feasible alternatives must be objectively presented for discussion and consideration. The DEIS/DEIR fails to do so by not including other real active alternatives other than some method of armoring the cliff.**
- O3-3 2) **Coastal erosion is not a "problem"; it is a "process".**
- O3-4 3) **The DEIS/DEIR does not adequately acknowledge and mitigate for the loss of vertical and lateral public beach access along the foot of the bluff, a significant cultural impact on recreational opportunities of this project.**
4) **The DEIS/DEIR does not adequately acknowledge and mitigate for the inevitable loss of the beach which hard armoring causes, a Significant Environmental Impact.**
- O3-5 5) **Once you start, you cannot stop. Hard stabilization is irreversible. Removal of seawalls almost never occurs.**

Responses

O3-1

See responses to Comments O2-1, O2-11, and O2-12 above.

O3-2

CEQA requires consideration of "a range of reasonable alternatives...which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project" (CEQA Guidelines Section 15126.6). Chapter 2 of the Revised Final EIS/EIR presents a comprehensive discussion of the development of alternatives for the proposed project and explains how the nonstructural alternatives were found to be either infeasible or would fail to meet the basic objectives of the project.

O3-3

We agree that coastal erosion is a process. However, this process can cause problems when it threatens to damage public facilities and curtail public access to the shoreline and coastal resources.

O3-4

As discussed in the Revised Final EIS/EIR, and noted above in the responses to Comments O2-1, O2-11, and O2-12, in the long-term, the proposed project would not substantially prevent recreational use of the area or interfere with the public's right of access to the sea. As described in Section 6.2.1, because of the natural variability in beach width, and the fact that the beach along this part of the shoreline is generally used for walking and surfing access, the limited loss in beach width over the project period would not constitute a significant impact on recreational uses of the shoreline. There would actually be some beneficial impacts on recreational uses, as described in Section 4.2.1.

O3-5

While we agree that seawalls are rarely removed, it would be technically possible to take out the proposed bluff protection structure if desired at a future date. The removal process would likely accelerate bluff failure, but it could be done.



Comments

Specific comments:

O3-6 **The DEIR/DEIS fails to adequately analyze and present, as required, an “official” alternative to hard armoring.**

We are encouraged to see the changes and additions made to this latest DEIR/DEIS resulting from the previous round of public comments, specifically the additional bluff hazard probability studies and the discussion of wave mechanics. However, the revised documents still fails to consider other non-structural, or “soft” alternatives to erosion response, as previously submitted by the Surfrider Foundation and other environmental groups.

Non-structural alternatives were only briefly discussed in Chapter 2.4 as “Alternatives and Alternate Components Considered but Eliminated”. Non-structural responses to erosion are valid alternatives that have been used elsewhere and deserve to be fully and objectively considered. The County’s clear preference and advocacy for hard structural armoring of the coast is evident in these revised documents, as it was in the previous versions. The failure to fully analyze reasonable alternatives shows a lack of objectivity from a public agency and result in a lack of sufficient information for reasonable public review and consideration of these proposals.

Therefore, we find the DEIR/DEIS incomplete in its analysis of erosion response alternatives because it does not document the immediate and long-term environmental and recreational impacts of all possible alternatives. Alternatives for reducing the potential for cliff failure may include: surface and sub-surface drainage improvements to eliminate surface run-off down the cliff-face; removal of rubble and riprap that currently line the base of the bluff; beach re-nourishment; establishing weight limits for vehicles on East Cliff Drive to reduce vibration from heavy vehicles; reduce traffic East Cliff drive by allowing only pedestrian, bike and resident traffic; re-locating East Cliff Drive to the inland side of the public right-of-way; planting native plants along the cliff to stabilize the upper soils and to reduce erosion from weather or other surface run-off; and managed retreat.

Official alternatives presented in DEIR/DEIS are incomplete and limited in scope.

O3-7 We assert that the four alternatives presented in the DRAFT DEIR/DEIS are incomplete and limited in scope for the following reasons:

1. Incomplete disclosure of full project cost-- including maintenance, repair, and replacement costs;

Responses

O3-6

See Section 2.4 of the Revised Final EIS/EIR and responses to Comments O2-4 and O3-2 above regarding the development of alternatives to the proposed project. Numerous nonstructural options were considered but were eliminated from further evaluation because they were either infeasible or would fail to meet basic project objectives.

O3-7

CEQA is an environmental law and does not require a detailed accounting of project costs. However, using state of the art soil nail wall and shotcrete construction would minimize the need for maintenance and repairs, and the County’s operational budget would be used to fund whatever upkeep is needed in the future. Because the design life of the wall is 100 years, it is not possible to accurately predict whether the structure would be replaced or what the cost might be at that point in time.

Comments

Responses

- O3-8 2. Incomplete analysis of long-term impacts on nearshore marine habitat and populations, sand transport, and recreational activities at Pleasure Point, namely surfing, which requires shoreline access during large swells;
- O3-9 3. Elimination of non-structural alternatives without documentation that shows sufficient analysis of these alternatives.
- O3-10 4. Failure to represent the full range of available, and feasible, solutions, thereby limiting informed public discussion of the users' preferred alternative.

Planned (or Managed) Retreat:

O3-11 Planned retreat may be the best long-term alternative. Scientists can currently project 100-year coastal contours (within 1 meter expected accuracy) based on erosion rates from the past 50 years, assuming similar conditions, on the average, which would include a few big storm events and erosion episodes. While an immediate solution may be necessary, it is unsound public policy to not plan and begin long-term solutions, which may be different than the immediate solution. For example, the documents flatly state "planned retreat is not practical in an urban developed area." They assert the alternative is not cost effective, but do not supply long-term comparative figures or arguments to support this conclusion.

We acknowledge this alternative would require an area-wide agency approach, changes in current public policy, and be socially challenging; however, such changes are not impossible to achieve if the will exists to cease repetition of past land-use mistakes and to plan in a more realistic and environmentally responsible way. Although a given alternative may be difficult to pursue, lack of will on the part of county staff does not make said alternative impossible or necessarily unworthy of public study.

By what standard should we judge the practicality of any action? And if "practicality" is our presumed decision-maker, as these documents assert, how do we justify the "practicality" of spending millions of taxpayer funds to attempt the delay of the natural forces of coastal erosion? **Coastal erosion is inevitable, and seawalls are a short-sighted "quick fix" that on this type of coastline incur negative environmental repercussions in the intermediate and long-term; seawalls are not a permanent solution to a complex situation.** The well-documented history of seawalls, even those along our county's coast, clearly shows the repeated failure of these structures to "protect" other coastal structures, the precise structures they were designed and built to protect.

The Coastal Act directs us to build away from the coast. We force ourselves to see erosion as a "problem" because we continue to allow the construction of buildings, roads, and utilities too close to the coast and then spend any amount of money or effort to "protect" them. Santa Cruz County cannot afford to sacrifice the health and accessibility of their profitable beaches for poorly planned constructions. When public funds are involved in such pre-doomed efforts it is only reasonable to proceed cautiously and with

O3-8

Section 8.2.1 of the Revised Final EIS/EIR provides a thorough discussion of short- and long-term impacts on nearshore marine habitat and populations. There would be no significant long-term biological resource impacts, and all significant short-term impacts would be fully mitigated. Section 6.2.1 has been extensively revised to more fully address impacts associated with sand transport and recreational activities at Pleasure Point.

O3-9

See response to Comment O3-6 above.

O3-10

Section 2.4 of the Revised Final EIS/EIR includes an expanded discussion of all the alternatives initially considered, and the specific reasons why some options were eliminated from further analysis. This discussion meets and exceeds CEQA requirements regarding evaluation of a reasonable range of alternatives.

O3-11

As noted in the response to Comment O2-2, planned retreat was initially considered during the planning process, and the Revised Final EIS/EIR provides an extensive discussion of the alternative and the reasons it was eliminated from further analysis (see Section 2.4.1). Also, please refer to the response to Comment O2-5 regarding County restrictions on new developments in close proximity to coastal bluffs.

Comments

Responses

O3-11
(cont'd)

knowledge of full history of similar seawalls and with financial information as to **how to finance endless rounds of new walls as the current one fails or outlives its usefulness.** Other alternatives can provide solutions to erosion that get more to the root of the situation. Careful study of any and all potential alternatives to hardening the coast with new seawalls must be given full attention.

O3-12

Current engineering and construction techniques have extended the life of bluff protection structures considerably. The design life of the proposed structure is approximately 100 years, well beyond the physical life of concrete walls built in the past. Although the emergency repairs constructed in 2004 are relatively new, they appear to be withstanding winter storms and holding up well. If the proposed project is approved, the County Department of Public Works will monitor and maintain the structure as necessary. We do not anticipate having to rebuild the wall every few decades.

O3-12

Moreover, the physical life of a concrete seawall is limited to 10-30 years. This assumes, again without conclusive data, that this shotcrete construction can withstand prolonged wave-action by storm events and assault by large marine debris common along this coast, which have been known to cause heavy damage and abrupt failure of both public and private coastal structures. There is no guarantee that a shotcrete wall will last more than a few heavy storm events. We have seen no discussion of what future plans the county may have when said seawall has exceeded its useful life. Is the plan to rebuild every few decades and throw more millions of public funds at another short-term "fix"?

O3-13

Please see the responses to Comments O-2-2 and O2-5.

O3-13

Planned Retreat is possible as a long-term planning approach to the reality of coastal erosion, and therefore, **should be a valid alternative** to the preferred project. Area-wide planning for urbanized areas should keep human safety and environmental integrity as priorities, and be revised according to our local knowledge of coastal erosion, which include:

FACT ONE: Santa Cruz County is a well-documented example of an actively eroding coastline, which is a natural and continuous process, and represents the type of coastline that is the worst-case candidate for a hard seawall;

FACT TWO: The trend for coastal planning is becoming increasingly precautionary as the impacts of global warming, such as out-of-season, higher intensity storm patterns, are documented;

FACT THREE: If coastal armoring continues, Santa Cruz county will stand to lose billions of tourism dollars and investment due to lost beaches. Estimates currently place 30% of the county coast as armored.

We **must** stop building on an actively-eroding coastline. We believe it is time to face the reality of coastal erosion and to change the way we approach coastal development. We urge Santa Cruz County to step up and be a leader on this vitally important issue.

Loss of Lateral Coastal Access:

O3-14

Retaining public access is one of the primary purposes of the East Cliff Bluff Protection and Parkway Project. The issue of long-term public access to the beach and shoreline is evaluated in detail in the Revised Final EIS/EIR (see Sections 4.2.1, 4.2.2, 6.2.1, and 6.2.2). Vertical access to the beach would be maintained; two stairways would be demolished and replaced, one would be left as is, and one would be removed, repaired, and reinstalled. The bluff face would also be sculpted and molded to follow the natural contours, including areas of high relief. Lateral access along the beach would not be restricted in any significant way either. Please refer to the responses to Comments O2-1, O2-11, and O2-12. Therefore no further mitigation measures would be required.

O3-14

The DRAFT DEIR/DEIS does not adequately acknowledge the access issues at risk with this project, which we contend would lead to a Significant Cultural, Environmental, and Financial Impact.

The inevitable loss of public lateral access (along beach) and vertical access (down to the beach) is a very serious consequence of this proposal. The DEIR/DEIS does

Comments

O3-14 (cont'd) | not take account for the public's right to enter and exit the waters safely under all kinds of coastal conditions. Likewise, no mitigation is discussed. We ask that all project documents, including the DEIR/DEIS be revised accordingly.

O3-15 | Although the **DEIR/DEIS** acknowledges the expected loss of sand and deepening of water depth seaward of the seawall, the report does not plan for an additional deepening of water from sea-level rise as the effects of global warming become more evident annually. Deeper water at the base of a proposed seawall make safe entry and exit from the Pleasure Point waters a critical issue for recreational users. Nearly every day of the year, between 50-300 surfers, kayakers, and swimmers of all ages and skills enter the waters immediately off area for proposed seawall. Pleasure Point is evidently the most popular and highly used surf spot in all of Monterey and Santa Cruz counties, and attracts a large number of beginners. Safe access to the water is a key component of the Pleasure Point recreational environment, and a legal right to a public resource.

O3-16 | It is not clear to us if the final project include a beach-level walkway, incorporated into the structure to allow foot-access along the base of the seawall, or will it include "goat paths" and handholds for people to exit the water during high tides and high surf? The surf community needs answers to these practical questions before any project approval is voted. We hope these concerns will be taken with the seriousness that they deserve, and we look to Santa Cruz County for a positive response.

O3-17 | Santa Cruz's beaches, easy public access to the coast, and superb surf breaks are why so many people choose to live in and visit Santa Cruz County. The financial, cultural, and recreational benefit Pleasure Point brings to the area, if quantifiable, would be astounding, and may exceed the quantifiable benefits of a seawall. We assert that an economic study needs to be undertaken to compare the true cost of building the seawall, including potential losses in the areas of culture, business, quality of life, and the environment, to the bluff-top views that will be saved.

O3-18 | **Abandoning public land and eliminating existing coastal access is not an acceptable action for a public agency funded by public tax monies.**

O3-19 | In conclusion, we feel Santa Cruz County is neglecting its responsibility to all segments of the community including but not limited to surfers and the recreational water-users of Pleasure Point. Any new seawall at this world-class surf site and favored local beach will have a huge immediate and long-term impact on the recreational, visual, and cultural environment of Pleasure Point, and no action should be taken without a broad, objective examination of all possible approaches to coastal erosion at this site.

Responses

O3-15

The Revised Final EIS/EIR includes a discussion of sea level rise in Section 6.2.1. Surfer and recreational user safety is of vital concern to the County, and the project plans include replacing or repairing all four stairways in the project area, as well as removing rubble and riprap at the foot of the bluff in order to provide a wider area of access for beachgoers.

O3-16

The project does not include a formal beach-level walkway, although the concrete apron at the base of the bluff would extend outward from the bluff approximately four feet. This apron would likely be exposed part of the year. Additionally, as mentioned above, the bluff face would be sculpted and molded to mimic the existing bluff face, including the areas of high relief.

O3-17

CEQA is an environmental law and does not require that an economic analysis be performed to justify a project. However, we have seen no evidence that construction of the proposed project would result in any economic losses to the Pleasure Point area. The proposed project would not only preserve bluff top views, it would also maintain and enhance public access to the coast and Pleasure Point surf breaks through protection of the public right-of-way and construction of the parkway improvements.

O3-18

The proposed action would not abandon public land and would not eliminate public access. To the contrary, the proposed action would further public access to the coastline by removing rubble and riprap from the bottom of the bluff, replacing aging stairways, and developing a safe and walkable/bikable parkway at the top of the bluff.

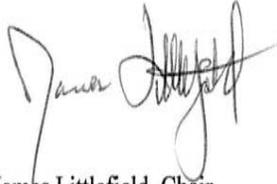
O3-19

The County Redevelopment Agency and Planning Department have made a concerted effort to work with the local community (see Section 1.7 of the Revised Final EIS/EIR). In addition to satisfying all of the legal public notification requirements, numerous additional community meetings and workshops were held to solicit public input, listen to local concerns, and respond to questions. Announcements of these meetings and workshops were mailed to over 2,000 local residents. In response to public and agency input, the alternatives analysis in the Revised Final EIS/EIR was expanded, and changes were made to the original project design. Every reasonable effort has been made to conduct a broad, objective planning process.

Comments

Thank you for taking these considerations seriously, and for the opportunity to review and comment on the DRAFT DEIR/DEIS. We look forward to your response.

For the oceans, waves, and beaches,



James Littlefield, Chair
Santa Cruz Chapter of the Surfrider Foundation

Cc:

Santa Cruz County Planning Commission

Santa Cruz County Board of Supervisors

California Coastal Commission

Responses

Comments

Keith & Kim Adams

500 41ST AVENUE SANTA CRUZ CALIFORNIA 95062-5205 (831) 479-4141

June 19, 2006

Claudia Slater
 Planning Department
 County of Santa Cruz
 701 Ocean Street
 Santa Cruz, CA 95060

RE: Revised Draft EIS/EIR for the East Cliff Drive Protection & Parkway Project

Dear Ms. Slater:

We support the East Cliff Drive Protection & Parkway Project and would like to submit the following comments.

- P1-1 | 1) The Pleasure Point Park and other public areas along East Cliff Drive should be preserved and not made smaller by adding parking spaces. These areas are beach front public assets that should not be impacted by unnecessary development. There is plenty of additional parking available for the walking on the Avenues of Pleasure Point.
- P1-2 | 2) The pathway needs to be flexible to accommodate all types of visiting public including pedestrians, young children, handicapped persons, skaters, skateboarders, scooters, and bicycles. We believe a hard smooth surface such as asphalt may best accommodate a mix of users.
- P1-3 | 3) Alternative 4 which uses groins and notch infilling would a great solution for that section of East Cliff Drive between 33rd and 36th Avenues. This would help lessen the need for hard structures and create some larger beaches for public use. It seems to be the best solution for that section of coast.

Sincerely,



Keith Adams



Kim Adams

Responses

P1-1

The amount and location(s) of public parking is an element of the Parkway Project that has prompted many public comments. How best to balance parking with other public access features of the project is subject to many considerations and the County Redevelopment Agency (RDA) will continue to work to balance the need for public access against local concerns. RDA's rationale in proposing the amount and configuration of parking included in the Revised Final EIS/EIR is as follows: As noted in Section 1.3 of the EIS/EIR, the parkway project is intended to help implement Section 30001.5 of the California Coastal Act, which promotes maximizing public access to the coast and public recreational opportunities within the coastal zone. Providing safe, adequate parking is an essential element in increasing public access to and enjoyment of coastal resources. In addition, the six parking spaces proposed on the seaward side of the road near Pleasure Point Park would essentially reclaim an area used for parking in the past. Parallel parking spaces were located in this area before East Cliff Drive was converted to a one-way road. Reclaiming this parking area would provide direct access to the park and the new beach access stairway, which would be particularly beneficial to elderly and disabled visitors and those with small children. The spaces proposed between 36th and 37th avenues replace six existing spaces and add seven more, including two parking spaces for the disabled. There are often times when visitors to the area want to stop for a short period and remain in their cars to view the waves or vistas. These spaces would increase the opportunity for that type of visitor experience. Adding parking spaces would not have a significant adverse effect on visual resources in the project area. The bicycle path and pedestrian walkway would be located on the seaward side of the parking areas and thus would provide unobstructed views of the ocean. With respect to viewing from cars, the proposed parking would be approximately 400 lineal feet, or less than 15 percent, of the proposed 2,800 lineal feet parkway. About 100 lineal feet of this parking is already present (on either side of the O'Neill residence).

P1-2

The proposed project would include a decomposed granite walkway that pedestrians, young children, and disabled persons could use and is separate from the asphalt path intended for bicyclists, skaters, and skateboarders. This design is intended to accommodate all users while discouraging user conflicts.

Comments

Responses

P1-3

Even if groins were constructed, full bluff armoring would be necessary to protect the public right-of-way, road, and utilities. Considering this, funding limitations and uncertainties about the possible permitting ramifications of groins, the RDA has elected not to propose a combination of bluff armoring and groins.

Comments

Claudia Slater

From: Elizabeth Nissen on behalf of RDA Webmail
Sent: Monday, June 26, 2006 11:21 AM
To: Paul Rodrigues; Claudia Slater
Subject: FW: East Cliff parking

-----Original Message-----

From: Annabella Beggs [mailto:ambeggs@hotmail.com]
Sent: Monday, June 26, 2006 10:59 AM
To: RDA Webmail
Subject: East Cliff parking

Greetings:

I have lived on 32nd Avenue (x-street E.Cliff) for twenty years. The foot, stroller, bike, skate and dog walking traffic is hazard enough without the potential of lessening the access with parked cars blocking visibility.

P2-1

The one-way car traffic has been a great compromise, allowing access to residents on E. Cliff Drive as well as a beautiful drive for surfers and tourists. The one-way traffic was to reduce the weight of the vehicles (trucks and cars) which was accelerating the erosion. The weight of parked cars, SUVs, RV's and trailers as well as the one-way traffic can not be good for the eroding cliffs. More parking would only encourage more driving because of the added parking.

"They take paradise and put up a parking lot."

Ideally most of us would love to see the section of E. Cliff between 32nd and 41st closed to all vehicle traffic (except emergency and garbage collection.) But I'm sure the residents who live there would disagree.

This is not a "high beach" traffic area. We have beaches here infrequently, the waves usually come right up to the cliffs. Surely there is a more suitable, less erosion hazard piece of property to build a parking lot on, than right on the cliffs.

Anne Beggs
 Live Oak resident

Is your PC infected? Get a FREE online computer virus scan from McAfee® Security. <http://clinic.mcafee.com/clinic/ibuy/campaign.asp?cid=3963>

1

Responses

P2-1

See response to Comment P1-1 above. Also, as noted in Section 9.2.1 of the Revised Final EIS/EIR, the additional parking spaces are not expected to generate new trips to the project area; rather, it is anticipated that they would reduce circulation through the neighborhood side streets by visitors searching for limited parking spots. Also, it is important to note that the additional parking spaces would be located in areas away from the bluff face, inland of the Pleasure Point Park, and near the intersection of East Cliff Drive and 37th Avenue; therefore, adding parking spaces should not accelerate erosion.