

Comments

A2-37 (cont'd) mitigation is warranted. We would like to recommend two additional visual resource mitigations/project enhancements designed to offset such impacts more fully. The first is to place the overhead utility lines along East Cliff Drive between 32nd and 41st Avenues underground. The second is to add a layer of camouflaging concrete texture to the County's Larch Lane seawall, either with or without the camouflaging treatment extending to cover the upcoast seawall (see comments regarding residence in the public r.o.w.). Please explain in more detail what would be required to implement these two mitigations/project enhancements, including detail on any feasibility issues.

Water Quality

A2-38 37. Please identify the types of filtration and treatment units that would be proposed in the project area to address water quality concerns and provide a site plan showing the location of these facilities as well as the stormwater management system as a whole. Please also explain any feasibility issues related to consolidating outfalls, including by identifying the minimum number of outfalls that would be possible, and explaining why fewer outfalls could not be used. Please review our letter to the County and the Corps dated December 8, 2003 for more detail on the types of water quality systems and measures expected for this project.

Beach/Surfing

A2-39 38. The draft document estimates a loss of ten to twenty feet of beach in the next 50 years due to the project (and presumably a similar rate of loss continuing past 50 years if the project remains in place – see also project lifetime comments above), but identifies this impact as insignificant. We do not agree that this impact is insignificant, and recommend that the document be modified to reflect this as a significant impact requiring mitigation. Potential mitigations may include some of the recommendations in this letter.

A2-40 39. We agree that the main surf breaks are further offshore, but that doesn't mean that there is no surfing within 400 feet of the bluffs as appears to be the premise of the draft document. Depending on swells and tides, surfing takes place throughout the area seaward of the bluffs, including very near the shore in certain circumstances. The impact assessment appears at least partially premised on the concept that the area within 400 feet of the bluffs can be disregarded in terms of these impacts. We do not agree with this methodology and believe that any subsequent documents need to also consider the impacts on recreational use within 400 feet of the bluffs, including mitigating any unavoidable impacts accordingly. Please modify the document accordingly.

A2-41 40. The draft document identifies a certain amount of uncertainty regarding future impacts to surfing, but does not identify a corresponding methodology to monitor and address any potential future impacts due to the wall. Please identify the manner in which potential surfing impacts over time will be monitored, and any impacts mitigated. A methodology for such monitoring was previously developed as part of the Commission's consideration of the previous Army Corps project (see December 8, 2003 letter to County and Corps).

Responses

A2-37 (cont'd)

issues or serve the greater good of providing maximum public access to the area.

A2-38

RDA intends to use continuous deflection separation (CDS) filtration units in the project area. While the Revised Final EIS/EIR does not include detailed stormwater drainage plans showing where the outfalls would be consolidated, more detailed plans have been developed and included in the Revised Final EIS/EIR and provided to Coastal Commission staff.

A2-39

At very low tides, people can walk cautiously along the narrow rock- and rubble-strewn beach below East Cliff Drive between 33rd and 36th avenues. However, with the exception of a very narrow seasonal beach at the base of the stairway just west of the O'Neill house, there is no dry beach used by beachgoers. Because of the orientation of this stretch of coastline and associated high littoral drift rate, a dry beach is not normally present, even at low tide, regardless of the time of year. This same situation exists along Depot Hill between Capitola and New Brighton Beach, which has the same orientation and lack of permanent dry beach. What little beach does exist is covered with rock and concrete rubble. The continuing slow rise in sea level will, over the next 50 years or so, gradually advance over the shoreline. Calculations based on average sea level rise rates and the slope of the beach indicate that the distance between the bluff base and mean lower low water line (MLLW) would decrease between 10 and 20 feet during the next 50 years. However, the encroachment of higher sea levels would not necessarily result in the loss of 10 to 20 feet of beach width because the beach at any particular time is a result of a combination of factors such as sand supply, wave height and period (steepness), tidal elevation, time of year, and recent storm history. The distance between the bluff base and the water line (which doesn't consist entirely of sandy beach) changes minute by minute, as well as hourly, daily, and seasonally. During a single spring tidal cycle, there may be a difference of 50 feet or more. Because of this wide variation and the small increment by which this distance would change with sea level rise over the next 50 years, it is unlikely that the average person would recognize this change in shoreline width on a year-to-year basis. Conditions under mid- and high tide

(cont'd)

Comments**Responses****A2-39 (cont'd)**

wouldn't change considerably as there is essentially no dry beach to use at present and little access or use of the "beach" area except at very low tides. Consequently, this impact is considered to be less than significant and does not require mitigation under CEQA.

A2-40

Section 6.2.1 of the Revised Final EIS/EIR presents a thorough discussion of potential project impacts on recreational wave breaks. Although the emphasis is placed on the main surf breaks about 400 to 600 feet offshore, the discussion does not ignore the nearshore area. Several factors are key to producing good surfing waves, including the characteristics of the waves themselves, their direction of approach, their period, and their height. The dominant waves that reach the Pleasure Point area and those that provide the best surfing conditions generally arrive from the northwest and are generated by storms in the North Pacific. Equally important to the waves themselves are the geological conditions in the coastal and offshore areas, including the orientation of the coastline relative to the approaching waves, the bottom bathymetry, location of "reefs" or rock outcrops and sandbars, and tidal conditions.

The Revised Final EIS/EIR specifically addresses how tidal elevations, sea level increase, bathymetry, and wave climate affect wave breaks at Pleasure Point. Each of these four factors, whether 100, 200, 400, or 600 feet offshore, are independent of the nature of the coastline. In other words, it does not matter whether the coastline consists of a narrow sandy beach, low rocky bluff, or a cliff covered with 18 inches of shotcrete. The broken wave or swash will wash up on whatever shoreline is present. Under some high tide conditions in the Pleasure Point area, a surfer may be able to ride waves nearly to the shoreline. This would not change if the proposed bluff protection structure were built because broken waves do not discern between impermeable sandstone/siltstone of the Purisima Formation and impermeable shotcrete covering the Purisima. Reflected waves at the base of East Cliff Drive in the Pleasure Point area at high tide are propagated a short distance offshore but are of such low energy they have no effect on incoming waves or surfing conditions. This would not change if the project is approved and the bluff is stabilized. Based on the fundamental factors that affect wave breaks in the Pleasure Point area, the proposed project would have an insignificant effect on surfing in the entire area shoreward of the main wave breaks.

Comments

Responses

A2-41 (cont'd) | Furthermore, it is our understanding that the County has initiated a data gathering project in tandem with USGS researchers to establish a baseline for such a monitoring effort. Please also explain the way in which this USGS-County effort relates to surfing impact analysis and the proposed project over time.

A2-41

This comment does not accurately capture the nature of the uncertainty identified in the Geologic Resources and Coastal Processes section of the Revised Final EIS/EIR (see Page 6-31, Recreational Wave Breaks). The impact analysis in the revised draft does not express uncertainty with respect to project impacts on surfing. As noted above and in Section 6.2.1, the proposed bluff protection structure would have a less than significant impact on wave breaks and surfing in the Pleasure Point area. Nevertheless, it is important to recognize that coastal areas are among the most dynamic on earth due to the interaction of land, sea, wind, waves, tides, erosion, and deposition. Coastal areas change over time because of the interaction of all these factors, which can combine in an infinite number of ways. Thus surfing conditions at Pleasure Point and elsewhere along the California coast will continue to change in unpredictable ways.

A2-42 | 41. We do not agree that the impact to the beach and surfing during construction would not be significant. On the contrary, a project of this magnitude in such a prominent beach and surfing use area for the duration expected would have significant impacts to beach and offshore users. We recommend that the document be modified to indicate that short term construction impacts on beach and surfing uses are significant, and in need of mitigation. Potential mitigations may include some of the recommendations in this letter.

A2-43 | 42. The draft document considers cumulative impacts to beach and offshore recreational use to be insignificant. It is not clear to us that this conclusion is supportable. Over time, beaches are expected to be lost due to this armoring and other armoring structures, as the back beach is fixed on an otherwise eroding coast coupled with sea level rise. Thus, recreational use of the beaches and immediate shore wave areas (e.g., for body surfing, skimboarding, etc) are expected to be adversely impacted over time. In addition, impacts to surfing areas further seaward are also possible, if not expected. Resident and visitor use of Santa Cruz County beaches and offshore recreational areas is significant and has been increasing over time; including at and around Live Oak and including Pleasure Point specifically. When that trend is considered in light of the trend of beach loss due to armoring, the outcome is fewer and lesser quality recreational areas to serve an ever-increasing level of public use. These impacts are exacerbated by the fact that many of the other nearby beaches have also been armored. In this sense, there is little question that the cumulative impact is significant. In addition, and contrary to some of the draft document text, there have been very few new seawalls or other types of armoring approved in recent times. Most armoring projects these days are projects designed to repair, maintain, and/or redevelop previously permitted armoring where many of the impacts from these prior structures (such as the passive erosion impact) have long been in effect. New projects, such as the seawall proposed here, must be understood as adding new impacts that are not occurring now. That is a different impact methodology than for a redevelopment or repair project, and the individual and cumulative impact for a new armoring project such as this is more than for repair or maintenance projects. In addition, the 1,400-foot linear shoreline of new seawall proposed in this case makes this the largest proposed seawall project in many years in Santa Cruz County and the Central Coast, and one of the largest in this area ever. We recommend that the document be modified to indicate that cumulative impacts to beach and offshore recreational use are significant, and in need of mitigation. Potential mitigations may include some of the recommendations in this letter.

Although not required by CEQA, RDA has chosen to fund some of the research necessary to understand this change in the Pleasure Point vicinity because of the area's exceptional surfing value. The US Geological Survey has been commissioned to establish baseline conditions in the area through 1) topographic, three-dimensional lidar mapping of the entire bluff area between 32nd and 41st avenues, 2) detailed bathymetric mapping of the offshore seabed, and 3) a year-long video recording of the incoming waves coordinated with measurements from an offshore buoy in Monterey Bay. The data generated from this research will document existing conditions that can be compared against future conditions. The study should also help us understand under what conditions certain wave breaks may develop. However, because change is inevitable in any natural system, it will not be possible to preserve the same surfing conditions in the Pleasure Point area forever, nor will it be possible to effectively mitigate for the change that does occur.

A2-42

The recreational impact analysis in the Revised Final EIS/EIR is based on thresholds that are identified in Sections 4.2 and 6.2, which were developed in compliance with CEQA requirements. This approach is used in evaluating projects so the impact analysis can be as objective as possible, and to explain the rationale behind the conclusions that are reached. The significance thresholds for recreational uses address disruption of recreational activities, (cont'd)

Other

A2-44 | 43. Figures 2-9a, b, and c lack a scale from which to measure. Please add a scale in feet (metric alone is insufficient).

Comments**Responses****A2-42 (cont'd)**

prevention of long-term uses, and substantial prevention of a use during the peak season (among others). As discussed in response to Comment A2-36, project construction would not occur throughout the entire project area at one time. Instead, construction would be sequential and staged so that while some sections of the bluff between Pleasure Point and The Hook would be off-limits, the remainder of the project area would be open for public access and surfing. Disruption of recreational uses would be restricted in both time and location, and thus would not constitute a significant impact. Construction of the emergency repairs in 2004, which were accomplished without significantly interfering with recreational uses, further support this conclusion.

A2-43

Cumulative impact analyses under CEQA involve determining whether there is an ongoing adverse impact on a resource and whether the project in question would substantially contribute to that impact. Section 15.2.2 of the Revised Final EIS/EIR acknowledges the increase in shoreline protection structures in California and the proposed project's contribution to that trend. However, as explained in Section 6.2.1 and the response to Comment A2-39 above, the proposed project would not significantly contribute to beach impacts because the beach in the Pleasure Point vicinity is narrow and is rarely used for stationary activities, such as sunbathing. Because of the lack of a year-round sandy beach and the rough surface of the Purisima tidal shelf, the area is only infrequently used for activities like body surfing or skim boarding. Recreational uses of the shoreline in this area are generally confined to walking, when sufficient beach is exposed, and access for surfing. The proposed bluff stabilization structure would not contribute to cumulative impacts on beach activities (e.g., sunbathing, body surfing, skim boarding) that normally occur to a very limited degree within project area. By removing substantial amounts of rubble and riprap from the beach area, opportunities for beach activities will be enhanced in the project vicinity.

Additionally, as noted above in the response to Comment A2-40, the proposed project is not expected to significantly impact wave breaks or surfing in the Pleasure Point area. While stabilizing the bluff would "fix" the position of the shoreline, and gradually rising sea level would progressively cover

(cont'd)

Comments**Responses****A2-43 (cont'd)**

more of the beach at certain times, variations in wave climate and offshore bathymetry will be the dominant forces influencing surfing conditions in the future, not whether the base of the bluff consists of bedrock or shotcrete. It is also important to recognize that by stabilizing the bluff and constructing the parkway, public access to the Pleasure Point area, for surfing and other recreational uses, would be preserved and enhanced. Allowing the public right-of-way to be lost through erosion would have a much more profound adverse effect on recreational uses in the area than stabilizing the bluff.

A2-44

Figures 2-9a, b, and c include a scale in feet in the lower left hand corners of each segment.

Comments

Claudia Slater, Santa Cruz County Planning Department
 Pleasure Point Parkway and Seawall Project (SCH # 2001012097)
 July 12, 2006
 Page 11

Responses

A2-45 | 44. Please provide elevation renderings of the proposed Pleasure Point Park bathroom.

A2-46 | 45. The draft document describes some of the existing parking spaces within the public right-of-way as "semi-private." This is a misnomer. Parking spaces in the public right-of-way are public parking spaces, and have no private connotations. Please correct.

A2-47 | 46. Finally, as you are aware, the Commission has a long history with this proposed project, including its corresponding NEPA/CEQA process and the previous Army Corps consistency determination. As we previously requested, please ensure that any final EIS/EIR documents respond to the range of issues, questions, comments, and information needs identified in our previous EIS/EIR comments (dated May 12, 2003) and in our letter to the County and the Corps specifically describing the range of information necessary for a re-submittal of the project (dated December 8, 2003). Clearly some of these prior comments have been at least partially addressed, but a final accounting of how and where they are addressed (and/or development of additional information to address the full range of previously identified information needs) should be a part of any final EIS/EIR documents.

Thank you for the opportunity to submit our preliminary comments on the project. We will continue to provide feedback regarding the project and any additional supporting information necessary for it as it progresses through the environmental review and coastal development permit process. We look forward to working with the County to address and resolve the coastal resource issues raised by the project. If you have any questions, please do not hesitate to contact me at the phone number and address given above.

Sincerely,



Dan Carl
 Coastal Planner

cc: Paul Rodrigues, Santa Cruz County Redevelopment Agency
 State Clearinghouse (SCH# 2001012097)

A2-45

Elevation renderings were part of the original project plan submittal and are included in the updated project plans submitted to the Planning Department, and provided to Coastal Commission staff.

A2-46

The term semiprivate has been deleted from the Revised Final EIS/EIR. The term was intended only to be descriptive of local residents' use of parking spots along the inland side of East Cliff Drive, not a validation of those claims by the County.

A2-47

A full accounting of how the May 12, 2003, Coastal Commission staff comments were addressed is included in Volume 2 of the October 2003 Final EIS/EIR. An explanation of what was incorporated into the Revised EIS/EIR to address the Coastal Commission staff's December 8, 2003 Revised Findings is provided below.

The main differences include:

- A geotechnical engineering company was hired to conduct an evaluation of the "threat" that coastal bluff erosion presents to East Cliff Drive, associated utilities, and the public right-of-way. This analysis included field reconnaissance, a review of aerial photo archives at the University of California Santa Cruz, a slope stability evaluation, and mapping of wave undercuts in the Purisima Formation at the base of the bluff. The threat analysis indicates that roughly 65 percent of East Cliff Drive, between 33rd and 36th avenues, and approximately 15 percent of the road at The Hook, are either immediately threatened by erosion or may be rendered unsafe within the next few years (see Section 2.3).

(cont'd)

Comments**Responses****A2-47 (cont'd)**

- The alternatives discussion has been reorganized and expanded to more fully explain the implications of the No Action Alternative and why nonstructural alternatives (e.g., drainage improvements, bluff vegetation, and beach nourishment) were initially considered but eliminated from further study. Options for moving the road, closing the road to through traffic, and the acquisition of private property, otherwise known as planned retreat, are also discussed (see Section 2.4).
- The project description and portions of the impact analysis, such as visual resources (see Section 5.2) and sand contribution calculations (see Section 6.1.9), have been updated to reflect the emergency cribwall repairs that were constructed during the summer of 2004. These repairs include three sculpted and colored concrete soil nail walls, which collectively cover about 290 linear feet of the upper bluff face (terrace deposits) between 33rd and 36th avenues (see Figures 2-9a and 2-9b for locations). These repairs were necessary to stabilize failing cribwalls and to protect public safety. Revisions to the impact analysis to reflect these changes in the environmental baseline are required under CEQA.
- Passages throughout the document were revised to reflect that RDA and the Department of Public Works are now the sole project sponsors. Previously, the Army Corps was a co-sponsor.



UNITED STATES DEPARTMENT OF COMMERCE
 National Oceanic and Atmospheric Administration
 NATIONAL OCEAN SERVICE
 Monterey Bay National Marine Sanctuary
 299 Foam Street
 Monterey, California 93940

August 4, 2006

Santa Cruz County Planning Department
 Attention: Claudia Slater
 701 Ocean Street, Fourth Floor
 Santa Cruz, California 95060

SUBJECT: Comments on Revised Draft of East Cliff Drive Bluff Protection and Parkway Environmental Impact Statement and Environmental Impact Report, in Santa Cruz County, within the Monterey Bay National Marine Sanctuary

Dear Ms. Slater:

A3-1

Thank you for the opportunity to comment on the Revised Draft of the East Cliff Drive Bluff Protection and Parkway DEIR/DEIS. When the proposal for this seawall was first considered in 2003, the Monterey Bay National Marine Sanctuary (MBNMS) provided a number of specific comments. The Draft represents an improvement over the previous iteration and is responsive on many fronts to the comments and concerns raised by the MBNMS and others. However, I believe that a thorough consideration of planned retreat as a viable alternative is still missing from the document.

A3-2

Protecting coastal resources was a significant reason the Monterey Bay National Marine Sanctuary was designated in 1992. Since that designation a considerable amount of coastal armoring has been installed along the Sanctuary's 276 mile coastline, usually on "emergency" basis. This has resulted in a significant loss of habitat, loss of beach access, and long-term alteration of the character of the central coast. As part of its management plan review, the MBNMS has been convening a work group made up of experts and stakeholders to consider the issues presented by coastal erosion and armoring of the shoreline. The goal of the group is to look at the problem outside the exigencies of a particular site and to take a broad, regional view of potential solutions. Our work with this group has underscored the importance of full consideration of planned retreat when developing proposals such as the East Cliff Drive seawall.

A3-3

In 2003 we did not believe that the DEIR/DEIS adequately explored non-armoring alternatives, particularly planned retreat. This was in large part responsible for our support of the "no action alternative". Unfortunately, the Revised Draft still does not include planned retreat as a considered alternative. The high costs of planned retreat need to be balanced with the recognition that sea level is rising and our coastline is inexorably moving inland. We can armor the coast to slow this process, but by doing so we lose the beaches and natural habitats that make this remarkable coastline what it is. The Draft anticipates that the proposed seawall project will fix the bluff location on an



Responses

A3-1

The Revised Final EIS/EIR includes an expanded discussion of planned retreat and the County's reasons for removing this alternative from detailed consideration (see Section 2.4.1). While we appreciate that some parties have a continued interest in this option, it is not a viable alternative from the County's perspective. While planned retreat could result in fewer short-term environmental effects than the proposed project, it would ultimately have significant adverse impacts related to the relocation of facilities, provision of emergency services, traffic circulation, and possibly public access to coastal resources. Additionally, a rough estimate of the first time cost of planned retreat for this stretch of coastline alone is \$28 to 46 million. This cost would have to be borne entirely by the local community and assumes that all of the property owners would be willing sellers. If not, the County would have to consider asserting eminent domain, which has not historically been used to take private residences. Finally, a planned retreat alternative could not reasonably be implemented for the proposed project area alone but would need to be implemented on a regional basis in concert with other land management agencies. For these reasons, planned retreat is not a feasible alternative and was therefore eliminated from further evaluation in the Revised Final EIS/EIR.

A3-2

Section 15.2.5 of the Revised Final EIS/EIR includes a summary of the available information on seawall construction within Monterey and Santa Cruz counties. Based on historical data from 1971 to 1993, the rate of increase in shoreline armoring appears to be decreasing and generally stabilizing. Because new developments in Santa Cruz County must be set back from coastal bluffs (General Plan Policy 6.2.12), most future armoring will likely be for maintaining existing structures or in urbanized areas where development already occurs in close proximity to coastal cliffs. Most of the projects in this latter category will likely be in areas with existing protection structures nearby, so that many future projects will fill gaps between existing armored segments of shoreline. While we recognize that this will not completely allay people's concerns about the proliferation of seawalls, it does provide valuable context for future discussions by forums, such as the work group convened by MBNMS. Finding broad regional solutions to the

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Comments

A3-3
(cont'd)

eroding shoreline. This will eventually result in the loss of the beach and the offshore surfing area. Armoring not only prevents lateral beach access by creating impassible peninsulas, but also contributes to greater erosion rates by depriving downstream locations of the significant sediment input provided by the natural process of bluff erosion. This only accelerates erosion rates elsewhere. Additionally, coastal armoring has a direct biological effect as it influences the structure of benthic communities due to differences in settlement patterns between natural substrates and armoring structures.

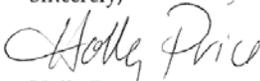
A3-4

Planned retreat may not ultimately be timely at all locations but the significant impacts of coastal armoring necessitates that it be considered as a legitimate alternative. Until we see a more detailed analysis of this alternative, we continue to support the "no action alternative". Among the options that are in fact considered in the document, the Sanctuary would favor the environmentally preferred alternative of armoring the lower portion of the bluff. This would reduce the footprint of the project, reduce the biological impact, and maintain the natural appearance of the upper half of the bluff.

A3-5

The proposed project would involve constructing a portion of the 1400-foot seawall in the MBNMS intertidal area which would ultimately result in a permanent loss of Sanctuary resources. This is a significant project and I would like to take the opportunity to remind the County that alteration of the seabed is prohibited under Sanctuary regulations, and Sanctuary Authorization is required before commencement of this project.

Thank you for the opportunity to review the Revised DEIR/DEIS. If you have any questions regarding our comments please contact Deirdre Hall in the MBNMS office at 831-647-4207.

Sincerely,

 Holly Price
 Acting Superintendent

cc: Y. Letellier, USACE
 D. Carl, CCC
 D. Pereksta, USFWS

Responses

A3-2 (cont'd)

problem of coastal erosion is a laudable goal. In the meantime, however, there are immediate needs that must be addressed, such as the erosion threatening portions of East Cliff Drive. We agree that emergency repairs are not the preferred approach to dealing with such problems, which is why the County Redevelopment Agency is proposing a well-planned project using state-of-the-art technology.

A3-3

The impacts of individual armoring projects will depend on site-specific conditions in each project area. Issues associated with one site may not be applicable to another location. A careful analysis of the East Cliff Drive project indicates that the proposed armoring would not cause a significant loss of beach or adversely affect the offshore surfing area. Please see responses to Comments A2-39 and A2-40 above. A thorough evaluation of sand supply issues also indicates that, in this particular case, there would not be a significant decrease in the amount of sediment that bluff erosion contributes to the littoral cell. The total annual decrease in sediment input as a result of the proposed armoring would be between 0.1 and 0.2 percent of the annual littoral drift rate. This topic is addressed in Section 6.2.1 of the Revised Final EIS/EIR and in the response to Comment A2-13 above. Significant impacts on benthic communities are not expected because the amount of sediment in the system would remain essentially the same and because the scour apron would extend only four feet out from the base of the bluff. Natural processes would cover this apron with sand much of the time, particularly during summer.

A3-4

Implementing the No Action Alternative would essentially result in a patchwork of emergency repairs over time as the bluff continues to fail. As indicated above, addressing the problem on an emergency basis is not beneficial, and the County would prefer to avoid that approach. Additionally, similar to the repairs constructed in 2004, future emergency repairs would probably cover only the upper bluff terrace deposits. While this would help preserve the road and public right-of-way for a while, erosion of the underlying Purisima Formation would continue and the upper bluff would eventually fail. With time, this section of East Cliff Drive, the associated utilities, and

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Comments**Responses****A3-4 (cont'd)**

perhaps most importantly, the public right-of-way along this stretch of the coast would be lost to erosion. It should also be noted that East Cliff Drive is designated as a part of the Monterey Bay National Marine Sanctuary Scenic Trail System for Santa Cruz County. The No Action Alternative would result in a loss of public access to this trail along the bay.

The environmentally preferable alternative identified in the Revised Final EIS/EIR is essentially a holdover from when the Army Corps of Engineers was a project co-sponsor and reflects the Corps' procedures for implementing NEPA. As explained in Section 2.10, the environmentally preferable/superior alternative was selected solely on the basis of what project would have the smallest footprint and would result in the least physical disturbance. While Alternative 3 best meets these criteria, it would not fully achieve the project objectives or realize the public benefits of the proposed Alternative 1. Under Alternative 3, only the Purisima Formation would be armored. This would reduce the project footprint but would provide less protection to the public right-of-way and infrastructure because the terrace deposits would still be subject to erosion. The parkway footprint would also be reduced, but this would be accomplished by eliminating some of the improvements to public access. Consequently, the Planning Department does not advocate implementing Alternative 3. Under CEQA, which allows for consideration of project goals and objectives, the Planning Department believes that a mitigated Alternative 1, as described in the Revised Final EIS/EIR, represents the environmentally superior alternative. Section 2.10 of the Revised Final EIS/EIR has been edited to reflect this.

A3-5

The County is aware that MBNMS must authorize construction of the proposed bluff protection structure, and that requirement is reflected in Section 2.11 (Table 2-5) of the Revised Draft EIR.