

# Coastside Beach Coalition

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August 3, 2013

President Bernardo and Members

San Mateo County Harbor District Board of Commissioners

Via email

**Subject: Pillar Point Harbor dredging and shoreline erosion (8/7/13 Agenda Item #4)**

The Coastside Beach Coalition is a local grassroots group working to help protect San Mateo County Coastside beaches, coastal access, and water quality. The catalyst for formation of the Beach Coalition was the increasingly urgent need for beneficial use of harbor sediment to address the adverse impacts of the Pillar Point Harbor breakwater on the surrounding shoreline, both inside and outside of the harbor. We have the following comments on the Pillar Point Harbor Dredging & Erosion Report for the 8/7/13 District meeting.

## Inner Harbor Perched Beach

The District goal to use dredged material to expand the Inner Harbor Perched Beach, as mitigation for paving over the existing beach, does not fit the definition of beneficial use. The area proposed for dredged material placement is sensitive habitat and is not eroding. A condition of the amended Coastal Permit 133-76-A for the Inner Harbor was to preserve the Inner Harbor beach, not to fill and pave it.

## West Shoreline Trail

For the past several years the West Shoreline Trail has been one big storm away from emergency closure. It is untenable that this trail should be closed to emergency vehicles, much less to public access. Yet the 2012 West Trail Erosion Study has not been brought forward for discussion of preferred alternatives for the past year and a half. The Study does not even consider a beach nourishment alternative. Now that Coastal Commission staff has been made aware of it by the public, they agree this project may be a good match for disposal of Harbor dredged material. Why spend \$365,000 on armoring, when that money could be combined with a needed dredging project? The District strategy seems to be to delay planning and permitting until an emergency situation exists and then insist on emergency armoring. We urge you to begin the permit process to repair the West Shoreline Trail with dredged material without further delay.

## Inner Harbor Maintenance Dredging

The Item #4 Report states, "The District will be inclined to focus on the quickest, easiest, and cheapest alternative consistent with its strategy objectives." The report acknowledges the launch ramp dredging delay due to public opposition to overuse of Perched Beach for dredge disposal. It is likely that the District will encounter similar opposition to other options for disposal in the Inner Harbor, adding to delays and cost. On the other hand, there will be public support for beach nourishment instead of armoring along the West Shoreline Trail.

### Strategy for Dredging and Reuse

Cost-effectiveness is given top priority while beneficial use for beach nourishment and public access is not. When weighing cost-effectiveness and benefits of beach nourishment, consideration should be given to the public fund (property taxes) which is the source of over half of District revenues. It seems that Harbor District staff is still overlooking costs and delays that result from proposals that continue damage to beaches, are unpopular with the public, and are likely to encounter resistance from the Coastal Commission.

### Dredging Webpage

This is a timely and useful addition to the District website. There is a misleading statement under PPH Boat Launch Ramp Dredging, which we would like to see corrected. It states that Perched Beach is a dredged material disposal site. We have been hearing this statement from the Harbor District for many years as a reason that maintenance dredged material had to be placed there and nowhere else. While Coastal Permit 133-76-A allowed creation of a perched beach on top of a natural beach with 20,000 cubic yards of suitable dredged sand in 1984, the CCC did not designate the site for on-going dredged material disposal. At regular intervals since the 1992 completion of the boat launch ramp, "emergency" maintenance dredging material was placed on Perched Beach without a Coastal Development Permit. CCC staff recently considered requiring removal of material placed in 1998 and 2006 and restoration of that beach area, just as they required for dredged material placed without permit on sensitive habitat seaward of the RV Park in 1984. That too was done by the District with the goal of expanding parking.

The informational webpage might also make mention of an important 2013-2014 project, the Santa Cruz Littoral Cell Regional Sediment Management (RSM) Plan, which is being developed for Pillar Point to Moss Landing. The Plan will include alternatives allowing for placement of clean sand within Sanctuary boundaries, and an acceptable pilot beach nourishment program for Surfer's Beach or other location within the Santa Cruz Littoral Cell. There will be coordination with both Monterey Bay and Gulf of Farallones National Marine Sanctuaries to address governance issues related to Plan implementation.

Thank you for your consideration,

s/Nicole David for  
Coastside Beach Coalition

Cc: Coastal Commission staff Nick Dreher and Madeleine Cavalieri