



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL OCEAN SERVICE

Greater Farallones National Marine Sanctuary
991 Marine Drive
San Francisco, CA 94129

July 28, 2015

Tom Mattusch, President
San Mateo County Harbor District, Board of Commissioners
PO Box 1449
El Granada, CA 94018

Dear Mr. Mattusch:

The National Oceanic and Atmospheric Administration, Office of National Marine Sanctuaries would like to express our appreciation to the San Mateo County Harbor District, Board of Commissioners (Harbor Commission) for its recent decision to serve as the lead entity to address erosion at Surfer's Beach adjacent to Pillar Point Harbor. We would also like to thank you and Commissioner Nicole David for inviting us to participate in the first meeting of the Harbor Commission's Beach Replenishment Committee on May 19, 2015 at the Half Moon Bay Yacht Club. We recognize the ongoing challenge of addressing erosion at Surfer's Beach and would like to continue to be engaged in this planning process by working collaboratively with the committee and the various participating regulatory agencies, stakeholders, and community members, to develop both short-term and long-term options for addressing erosion along this stretch of coast that would serve as sustainable and effective alternatives to coastal armoring. The primary mandate of national marine sanctuaries is resource protection and, while the impacts of coastal armoring vary based on the specifics of each site, we are concerned that armoring typically leads to damage or alteration to local coastal habitats, deprives beaches of sand, and accelerates erosion of adjacent beaches.

Monterey Bay National Marine Sanctuary (MBNMS) and Greater Farallones National Marine Sanctuary (GFNMS) (formerly known as Gulf of the Farallones National Marine Sanctuary) are Federally-protected marine areas on California's north and central coast. Pillar Point Harbor lies adjacent to MBNMS. GFNMS is responsible for managing and permitting activities within the northern portion of the MBNMS, north of Point Año Nuevo. GFNMS coordinates closely with MBNMS staff on all emerging issues and broader management decisions for this area.

MBNMS regulations prohibit, among other things, the alteration of the seabed, the discharging or depositing any material into the sanctuary, or constructing or placing any material or other matter on the submerged lands (CFR 922.132(a)(2) and (4)). Activities that would otherwise violate these regulations may in some cases be allowed by a permit under CFR sections 922.49, 922.132(e), and 922.133 if they meet the specified permit criteria. MBNMS can consider permitting certain activities to address shoreline erosion. However, both the regulations and the terms of designation for MBNMS contain specific language that precludes issuing a permit for any project that involves dredged material being disposed of or placed within the sanctuary (i.e.

below mean high water) other than at designated disposal sites authorized by the U.S. Environmental Protection Agency prior to the effective date of designation, in 1992.

Nonetheless, we believe there are some feasible options, both short-term and long-term to address the myriad issues at Surfer's Beach and in the harbor. The first, and our preferred, short-term option involves sourcing sand from the shoal that has formed nearby, inside the outer breakwater of Pillar Point Harbor and placing it above mean high water along the most heavily eroding areas of Surfer's Beach so that sand can naturally work into the littoral system and help attenuate erosion; we believe there is an available deposition zone between 80 – 140 feet wide in that area between the bluff and the mean high water line. This alternative would not require a sanctuary permit since sand would be placed outside the boundaries of the sanctuary. If the Harbor Commission were to pursue this option, GFNMS/MBNMS would work with the commission and other agencies to provide historic shoreline data for the Surfer's Beach area to determine a baseline for the sanctuary's boundary. A second short-term option that also could be considered would be to source sand other than from harbor dredge sources, perhaps from upland areas beyond MBNMS, and truck it to and place it below mean high water along Surfer's Beach. This option could possibly be permitted within MBNMS regulations provided that the pilot project design meets strict resource protection standards and MBNMS permit issuance criteria.

Given the significant rates of erosion at Surfer's Beach, GFNMS/MBNMS also recognize that a long-term solution may be needed. Long-term options that might be considered include additional beach nourishment above mean high water including source sand from within the harbor, provided that pilot studies and placement episodes prove effective and protective of sanctuary resources; evaluating the feasibility of a planned managed retreat of Highway 1 to eliminate the need for further coastal armoring (like rock slope protection) and to allow for the beach to be restored; and/or modifying the outer breakwater, which has contributed significantly to the erosion occurring in this area by interfering with the natural sediment transport along this stretch of coast.

It is also our understanding that the California Department of Transportation (Caltrans) is currently in the processing of implementing a shoreline protection project to protect Highway 1 that will involve short-term emergency armoring along the most severely eroded portion of the bluff at Surfer's Beach, while a long-term plan can be developed that achieves shoreline protection without continued and increased coastal armoring. We believe that the first short term alternative discussed above can be carried out promptly to reduce and perhaps eliminate the need for armoring at Surfer's Beach while also providing new sand to nourish the beach, thereby allowing improvement of the area for various coastal recreation activities.

I want to also be sure you are advised that MBNMS is initiating a process this summer to update its Management Plan. This update process will include a scoping period and a public comment period where the community, stakeholders, and other agencies, can provide recommendations and suggestions as to how MBNMS may consider revising its Management Plan.

We are prepared to work with the Harbor Commission, the Beach Replenishment Committee, Caltrans and the other agencies during the development of any potential alternatives to ensure that a comprehensive and coordinated approach is taken to addressing erosion at Surfer's Beach. If you have any questions, please contact me or Max Delaney at GFNMS at (415) 970-5255.

Sincerely,

A handwritten signature in black ink that reads "Maria Brown". The signature is written in a cursive, flowing style.

Maria Brown, Superintendent
Greater Farallones National Marine Sanctuary

cc:

Nicole David, Vice President, San Mateo County Harbor Commission
Charles Lester, California Coastal Commission
Renee Ananda, California Coastal Commission
Clif Davenport, California Sediment Management Workgroup
Chris Potter, California Sediment Management Workgroup
Ron Moriguchi, California Department of Transportation
Bob Solatar, California Department of Transportation
Tom Kendall, U.S. Army Corps of Engineers
Tara Beach, U.S. Army Corps of Engineers
James Zoulas, U.S. Army Corps of Engineers
Brian Ross, U.S. Environmental Protection Agency
William Douros, ONMS West Coast Regional Director
Paul Michel, MBNMS Superintendent