



October 7, 2014

Ref: 8411197

Ms. Kelsey Ducklow
NOAA Coastal Management Fellow
California Coastal Commission
45 Fremont Street, Suite 2000
San Francisco, CA 94105

RE: Application No. 2-14-1340 – Response to Letter of August 28, 2014

Dear Ms. Ducklow:

On behalf of the San Mateo County Harbor District, we are providing the following feedback to the letter referenced above. Items 1 through 5 presented in that letter are paraphrased and addressed below, followed by updated project information.

1. ***Erosion Analysis and Description of Project Alternatives.*** *A key component of the proposed project is the placement of rock slope protection (RSP) and construction of a soldier pile wall to protect the (proposed) replaced culvert and trail in that location from erosion. However, the project materials do not include a detailed analysis of the past and current erosion at site, nor is there any consideration of the potential for future sea level rise impacts. Please submit an analysis that clearly identifies erosion hazards in the area both as they currently exist and how they may impact the site in the future given sea level rise. Please also include an analysis of potential alternatives to the proposed project. This analysis should include, at a minimum, the following: a) need for RSP and soldier pile wall in this location and analysis of potential for these structures to result in increased erosion to adjacent areas; b) consideration of alternative measures including a “no project” alternative and possible “soft” solutions; and c) description of potential resource impacts and effectiveness of each alternative including potential for sea level rise.*

Additional Project Background and Existing Conditions

The overall intent of the Pillar Point Harbor West Trail Culvert Repair Project (project) in Half Moon Bay, CA is to preserve future coastal access provided by West Trail. The proposed project will replace the two existing culverts with a single pipe culvert, add a wall to the face of the slope at the edge of the trail to prevent future erosion, and add rock slope protection (RSP) to the area below the stormwater outfall to prevent beach erosion.

The existing culverts cross under the existing trail perpendicularly and originally outletted past the face of the shoreline slope below the mean high water line. The higher culvert is 12-inch corrugated metal pipe (CMP) and the lower culvert is 18-inch inner diameter reinforced concrete pipe (RCP). Due to the mean high water line's elevation of 5.5 feet, which is two-thirds of the height of the end of the lower pipe, we believe that the tide has washed rounded rocks and sediment in, thus reducing the capacity of the culvert. During heavier storm events, it is possible that the culvert cannot convey the necessary volume of stormwater due to its diminished capacity and tidal intrusion. The 18-inch RCP culvert has come apart at the last three joints, causing stormwater to flow out of the pipe prior to the outlet and consequently undermine and erode the slope at the edge of the trail.



a) Need for RSP and Soldier Pile Wall and Potential for Increased Erosion in Adjacent Areas

RSP is specified at the sandy area below the new culvert outlet to prevent scouring and undermining of the soldier pile wall. The RSP will dissipate the existing stormwater's outfall energy and reduce erosion at the location of the wall and the adjacent shoreline.

b) Consideration of Alternative Measures including a “No Project” Alternative and “Soft” Solutions

Soft Alternatives

A future project will consider alternatives to repair the shoreline and protect it from further erosion. Alternatives for consideration include soldier pile walls, placement of dredged materials, and use of a living shoreline. Placement of dredged materials was not a feasible alternative for this proposed project because the culvert repair is urgent to provide continued and safe coastal access – the Harbor District would not be able to wait until a future date when harbor maintenance dredging is proposed (and permits secured).

No Project

Slope erosion has occurred along the entire shoreline adjacent to the West Trail. If no repair measures are undertaken, use of the trail by pedestrians and emergency vehicles will cease at some undetermined point in time.

c) Potential Resource Impacts and Sea-Level Rise

The alternative chosen for slope restoration and protection at the culvert repair location is a soldier pile wall. It will provide the highest likelihood of retaining compacted fill in the eroded area and will conform to with adjacent slopes to minimize negative impacts to the surrounding shoreline. Less intrusive alternatives; like placement of dredged materials, use of a living shoreline, or no shoreline protective structures, have a much higher probability of future failure (e.g., shoreline erosion) at the culvert outlet and surrounding areas.

In order to mitigate some of the tidal effects on the new pipe culvert, the outlet end of the new pipe culvert will conform to the face of the trail slope adjacent to the presently eroded area. This new outlet location eliminates the last 20 linear feet of existing culvert and raises the outlet invert of the pipe by approximately 2.0 feet from elevation 4.5 to elevation 6.5, which brings the pipe invert above the mean high water line (MHWL) elevation of 5.5. The current high water line (HWL) elevation of 8.0 is approximately equal to the centerline of the proposed culvert. A Tideflex slip-in style inline Checkmate check valve will be installed in the new culvert to prevent tidal and rock intrusion and to reduce impacts of sea level rise on the new culvert.

To review this project relative to potential sea-level rise, data generated by the San Francisco Bay Conservation and Development Commission (BCDC) was assumed for Pillar Point Harbor. The BCDC's projected 2050 sea level rise is 16 inches, which would raise the MHWL elevation to 6.8, 2.0 inches above the pipe invert, and the HWL elevation to 9.3, 4.0 inches below the top of the inside of pipe. For the projected 55-inch sea level rise in 2099, the MHWL elevation would be 10.1, nearly 6 inches above the top of the inside of pipe, and the HWL would be 12.6, which results in submerging the pipe and the trail. The Tideflex slip-in style inline Checkmate check valve would prevent sea water from entering the pipe during conditions when sea level is higher than the pipe invert.

Two additional alternative designs were described in the project description submitted on July 30. The first alternative – connection of existing 24-inch CMP into an enclosed buried concrete junction box -- was not selected as this “closed” system posed greater effort and potential challenges for adequate and



efficient maintenance. The other alternative proposed capping or abandonment [in-place] of the existing culverts under West Trail and construction of a concrete apron across the surface of the trail. The existing 24-inch CMP traversing down the adjacent hillside would discharge onto the apron, which would be pitched such to allow the stormwater flow to cross the trail and empty directly into the harbor. This alternative scenario was not selected due to accessibility and compliance issues vis-à-vis the Americans with Disability Act (ADA) requirements.

- 2. **Revised Construction Timeline.** The project details state that construction will occur prior to the onset of the rainy season on October 15 so as to avoid potential for water quality contamination from runoff and to avoid potential California red-legged frog dispersal events. Given that you submitted this CDP application on July 31st and it is currently incomplete, it seems unlikely that you will be able to obtain your CDP and complete construction before October 15, 2014. Therefore, please submit a revised project timeline that includes any additional measures necessary to protect water quality and avoid impacts tot the California red-legged frog.*

The Harbor District would like to proceed with construction as soon as possible after all permits are secured. At this time it is difficult to estimate when that would occur, but it may be in late 2014 or early 2015. The second bullet of “Measures to Protect Special-status Wildlife Species, Nesting Birds, and Sensitive Habitat,” states that a biologist will inspect the site each morning to prevent take of individuals. The measures included in the project description for California red-legged frog (CRLF) are avoidance and minimization measures. The first measure is revised to state that ground disturbance would be limited to the dry season if feasible (see below). Therefore, the Project will be in compliance with the stated measures, and even if ground disturbance occurs during potential dispersal events, the daily site inspections, as well as implementation of the other 17 avoidance and minimization measures, will avoid significant adverse impacts to CRLF if they are present.

The avoidance and mitigation measures included in “staging and fueling” and “construction best management practices”, including erosion and sediment control measures, would still be applicable during the rainy season and would serve to protect water quality during construction.

California red-legged frog (CRLF): The following avoidance measures, adopted from the *Programmatic Biological Opinion* (USFWS 1999), will be implemented to prevent mortality of individuals:

- 1. If feasible, Ground disturbing construction activities will be limited to the dry season period from May 1 through October 15, to avoid potential CRLF dispersal events.*

With these revisions, the project would successfully avoid adverse impacts to CLRF and protect water quality during construction.

- 3. **Other Agency Approvals.** The proposed project includes the placement of 205 square feet of fill (the proposed rock slope protection and soldier pile wall) into jurisdictional waters. Please provide us with any approval obtained from State Lands Commission or US Army Corps of Engineers, or updates on approval requirements, when they are available.*

This project is not subject to a lease from the State Land Commission, because the project site is on a land grant issued to the San Mateo County Harbor District, and the project does not include dredging. An application has been submitted with the Army Corps of Engineers and the Regional Water Quality Control Board (RWQCB). For the RWQCB, our assigned staff person is Eileen Leung, 510-622-2316, Eileen.Leung@waterboards.ca.gov and the file number is 808145. For the Army Corps, our assigned staff



person is Alisha Kerschbaum, 415-503-6783, alisha.s.kerschbaum@usace.army.mil, file number 2014-00294.

4. **Reduced and Electronic Copies.** *Please provide copies of the project plans that have been reduced to 8.5 x 11" in size. Please also submit electronic copies of the project materials.*

Reduced plans are attached. Electronic copies are also included with this submittal.

5. **Inconsistencies in Application.** *Item 8 on page 3 of the application says that no grading is proposed for the project. However, Keynote 3 on item 2 of drawing C-501 refers to grading of the hillslope. Please clarify this discrepancy.*

No grading is proposed. The eroded shoreline would be recontoured where it meets the soldier pile wall to match and conform to existing grade. The updated plan sheet is included with this application.

If you have additional questions or require additional information, please do not hesitate in contacting me at 707-523-1010 or dave.davis@ghd.com. We look forward to continue working with you on this – and future – important Harbor District projects.

Sincerely,
GHD Inc.

A handwritten signature in blue ink that reads 'David D. Davis'.

David D. Davis, AICP
Senior Planner

Enc.

c: P. Grenell, San Mateo County Harbor District
S. Grindy, San Mateo County Harbor District
E. Leung, RWQCB
A. Kerschbaum, Army Corps of Engineers

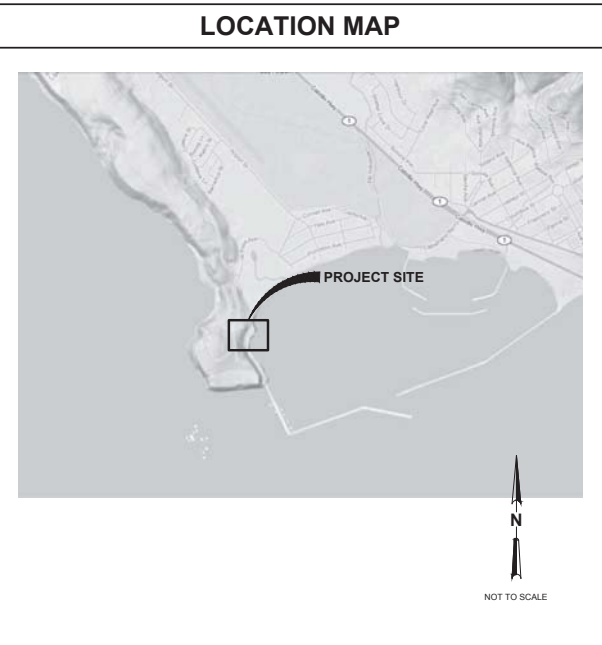
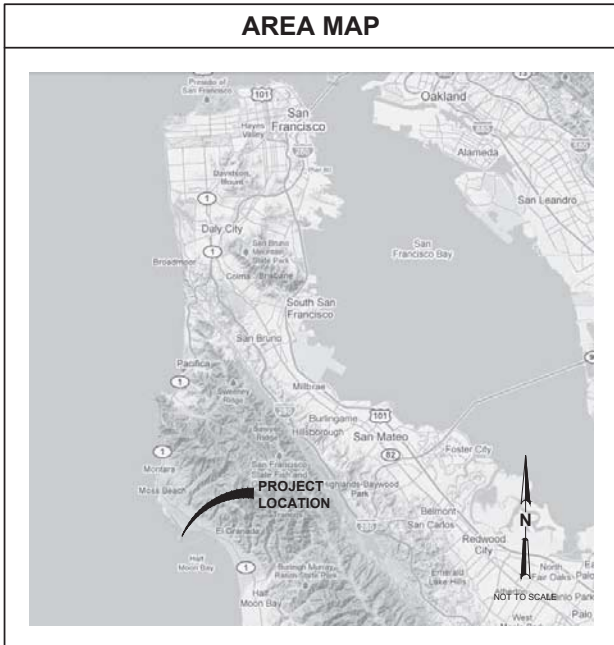


SAN MATEO COUNTY HARBOR DISTRICT

PILLAR POINT HARBOR

WEST TRAIL CULVERT REPAIR

JULY 2014



SHEET INDEX

SHEET OF	DRAWING NUMBER	DESCRIPTION
GENERAL		
1	G- 001	TITLE SHEET, LOCATION MAP, AREA MAP, SHEET INDEX
2	G- 002	GENERAL NOTES, LEGEND, AND ABBREVIATIONS
CIVIL		
3	C- 101	EXISTING SITE PLAN AND SURVEY CONTROL
4	C- 102	CONTRACTOR STAGING PLAN
5	C- 501	CIVIL DETAILS
STRUCTURAL		
6	S- 001	STRUCTURAL GENERAL NOTES

No.	Revision	Drawn	JD. Manager	Project Director	Date
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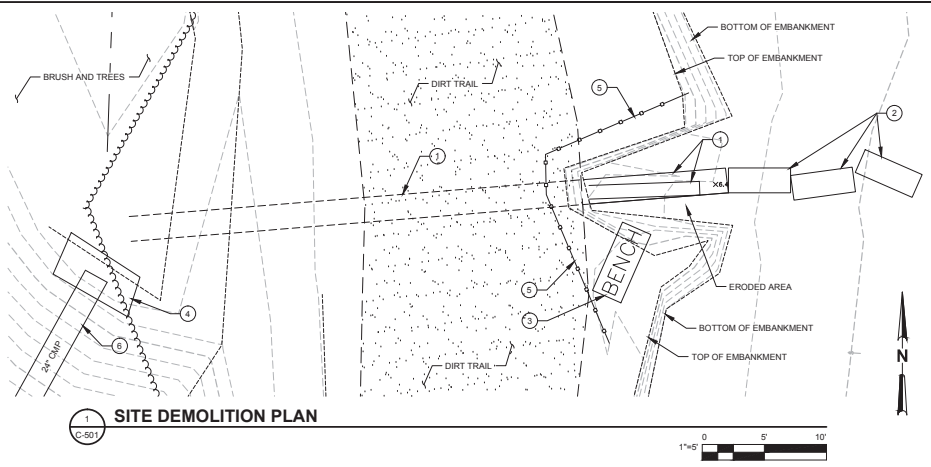
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 Project **PILLAR POINT HARBOR WEST TRAIL CULVERT REPAIR**

Title **TITLE SHEET, LOCATION MAP, AREA MAP, SHEET INDEX**

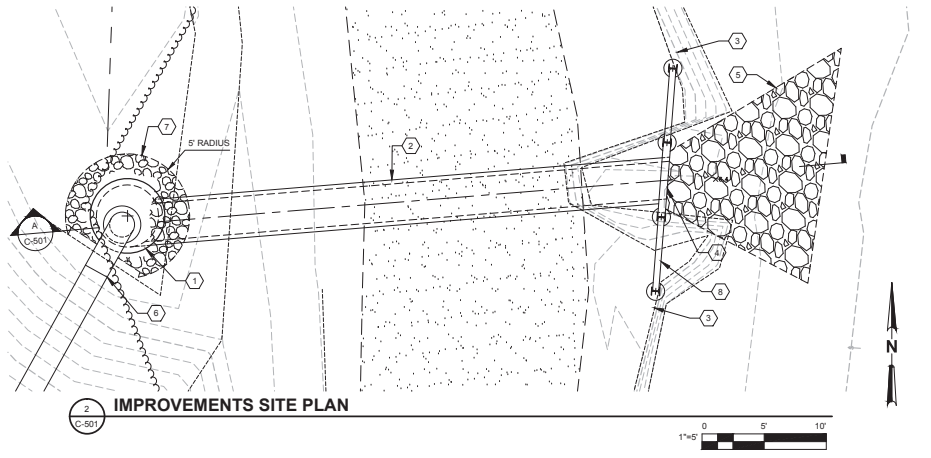
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Drawn	PS	Designer	CL
Drawing Check	SD	Design Check	MM
Approved (Project Director)	Date JULY 2014		

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Drawing No.	G-001	Original Size	ANSI D
	of 7	Rev.	



- DEMOLITION NOTES**
- REMOVE AND DISPOSE OF EXISTING BURIED 18" RCP AND 12" CMP PIPES AND SEPARATED PIPE SEGMENTS. (APPROXIMATELY 48 LF EACH)
 - REMOVE AND DISPOSE OF EXISTING EXPOSED AND SEPARATED 18" RCP PIPE SEGMENTS.
 - EXISTING BENCH AND CONCRETE FOUNDATION TO BE REMOVED. SALVAGE BENCH AND RETURN TO SAN MATEO COUNTY HARBOR DISTRICT.
 - EXISTING CONCRETE SLAB AT OUTFALL OF EXISTING 24" CMP TO REMAIN IN PLACE.
 - REMOVE AND DISPOSE OF EXISTING CONSTRUCTION FENCE FABRIC AND METAL STAKES.
 - EXISTING 24" CMP AT GRADE TO REMAIN IN PLACE.



- KEYNOTES**
- INSTALL 60 INCH ID FLAT TOP MANHOLE WITH 36 INCH DIAMETER ROUND GRATED LID. CONTRACTOR SHALL POTHOLE TO CONFIRM ORIENTATION AND INVERT ELEVATIONS OF EXISTING 18 INCH RCP AND 12 INCH CMP. PROVIDE EXISTING PIPE INFORMATION TO ENGINEER TO CONFIRM MANHOLE SIZE AND PIPE CONNECTIONS PRIOR TO ORDERING MANHOLE.
 - INSTALL 42 LF 36 INCH RCP FROM NEW MANHOLE ALONG ROUTE OF EXISTING 18 INCH RCP AND 12 INCH CMP (TO BE REMOVED). TRENCH DIMENSIONS AND BEDDING SHALL BE IN ACCORDANCE WITH SAN MATEO DPW STANDARD PLAN W-10. TRENCH BACKFILL SHALL BE CLSM AND SHALL BE 6" DEEP OVER PIPE.
 - RECOUNTOUR EMBANKMENT FACE AT NEW WALL ENDS TO MATCH AND CONFORM TO EXISTING GRADE.
 - INSTALL TIDEFLEX SLIP-IN STYLE INLINE CHECKMATE CHECK VALVE OR APPROVED EQUAL.
 - INSTALL 1/4 TON ROCK APRON AT PIPE OUTFALL IN ACCORDANCE WITH CALTRANS SPECIFICATION SECTION 72 PLACEMENT METHOD B. 1/4 TON ROCK DEPTH SHALL BE 3.3 FEET WITH 1.25 FEET OF UNDERLYING BACKING NO. 2 AND TYPE A RSP FABRIC. APRON SHALL EXTEND TO THE MEAN HIGH WATER LINE AT ELEVATION 5.5.
 - CLAMP 3 LF OF 24 INCH CMP AND 90 DEGREE CMP ELBOW TO EXISTING 24 INCH CMP. NEW SECTION AND ELBOW SHALL BE REMOVABLE FOR MANHOLE MAINTENANCE. ELBOW SHALL BE CENTERED OVER NEW ROUND GRATED LID OF NEW MANHOLE.
 - INSTALL BACKING NO. 2 RIP RAP PROTECTION IN A 5' RADIUS FROM THE CENTER OF THE NEW MANHOLE. DEPTH SHALL BE 1.25 FEET AND RSP FABRIC SHALL BE TYPE A. RIP RAP SHALL BE PLACED IN ACCORDANCE WITH CALTRANS SPECIFICATION SECTION 72 PLACEMENT METHOD B.
 - INSTALL SOLDIER PILE/CONCRETE LAGGING WALL AS SHOWN ON SHEET S-501.

No.	Revision	Drawn	Job Manager	Project Director	Date
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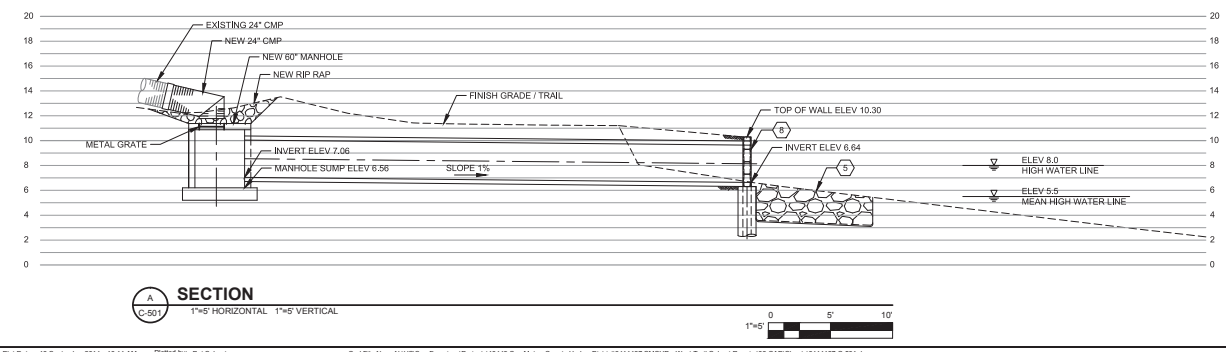
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Project: **PILLAR POINT HARBOR WEST TRAIL CULVERT REPAIR**

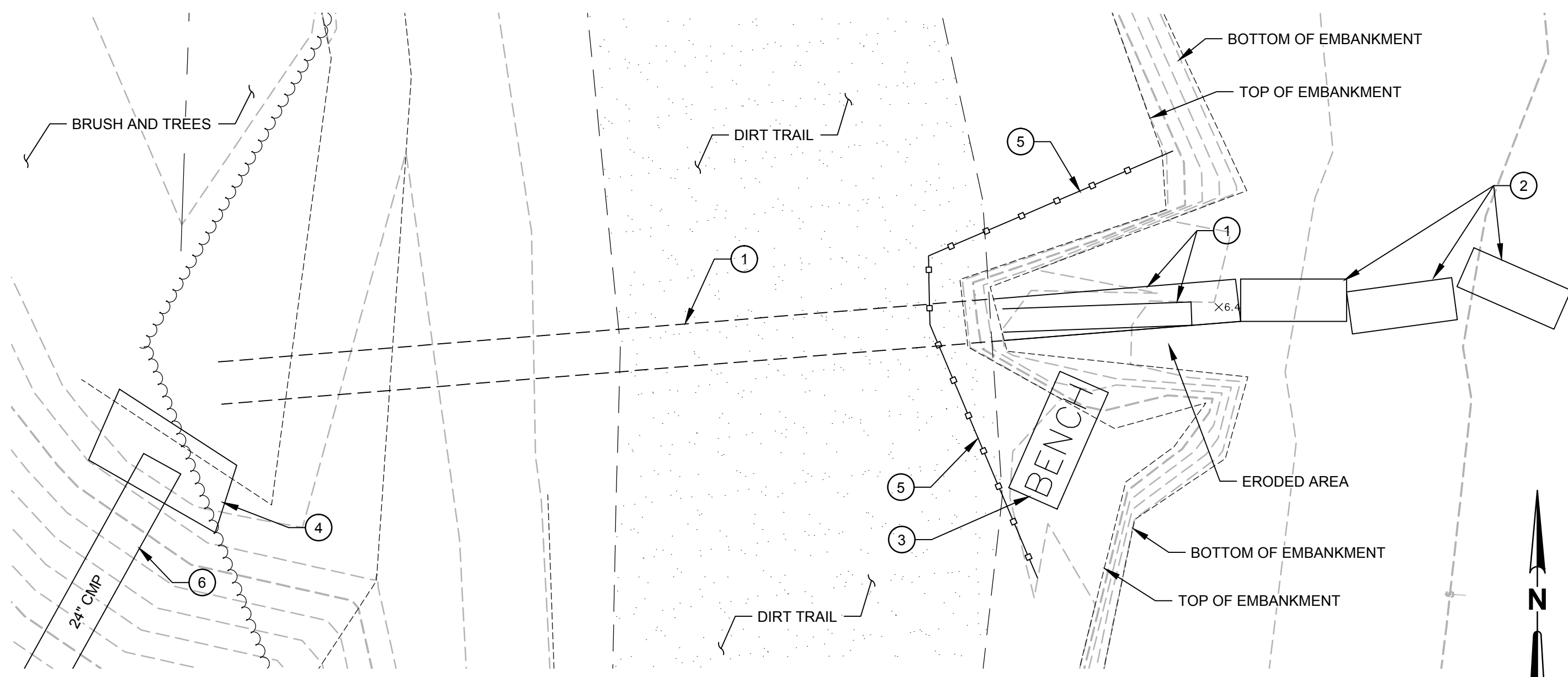
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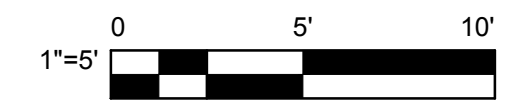
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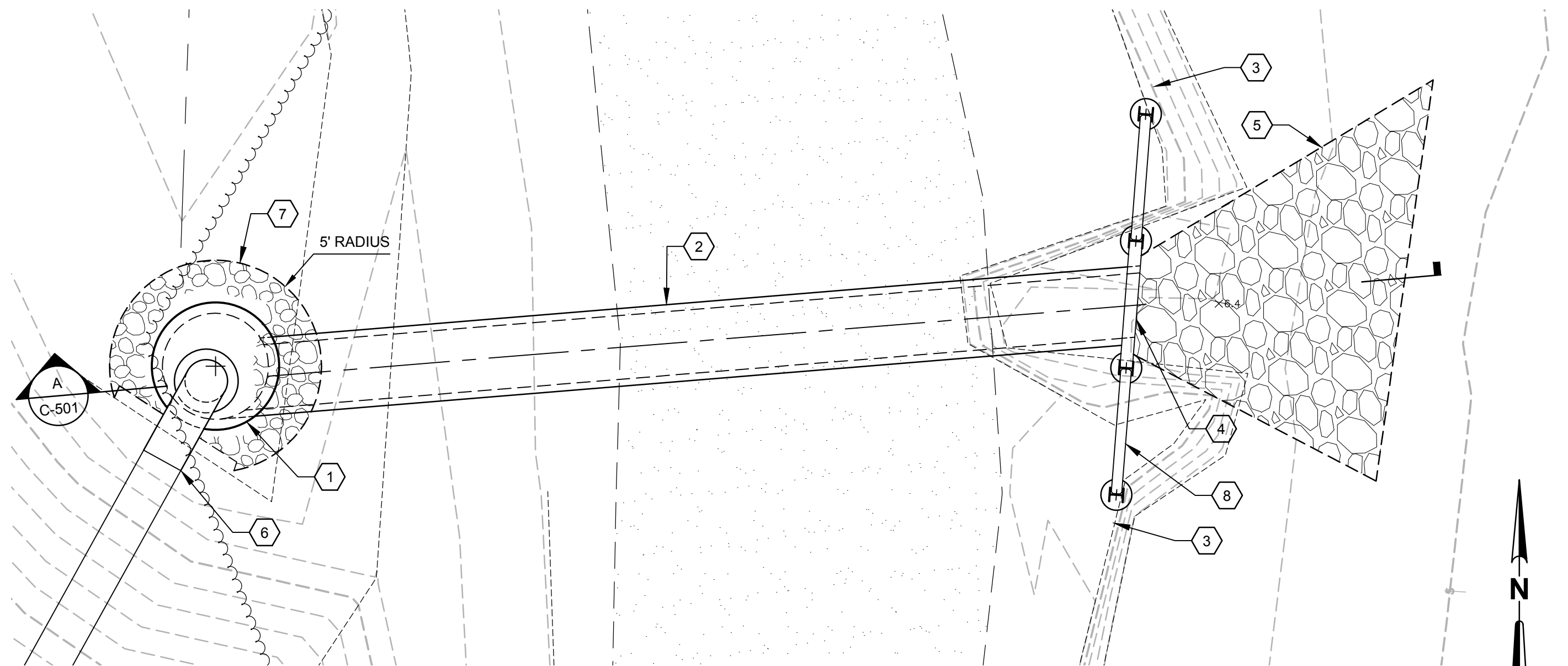
1 SITE DEMOLITION PLAN

C-501



DEMOLITION NOTES

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2 IMPROVEMENTS SITE PLAN

C-501

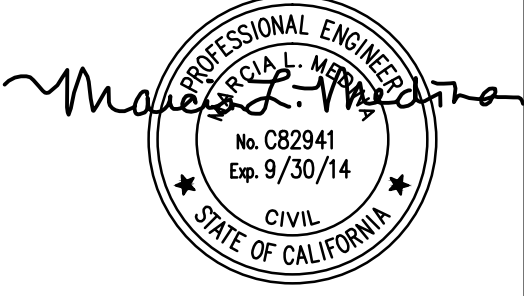


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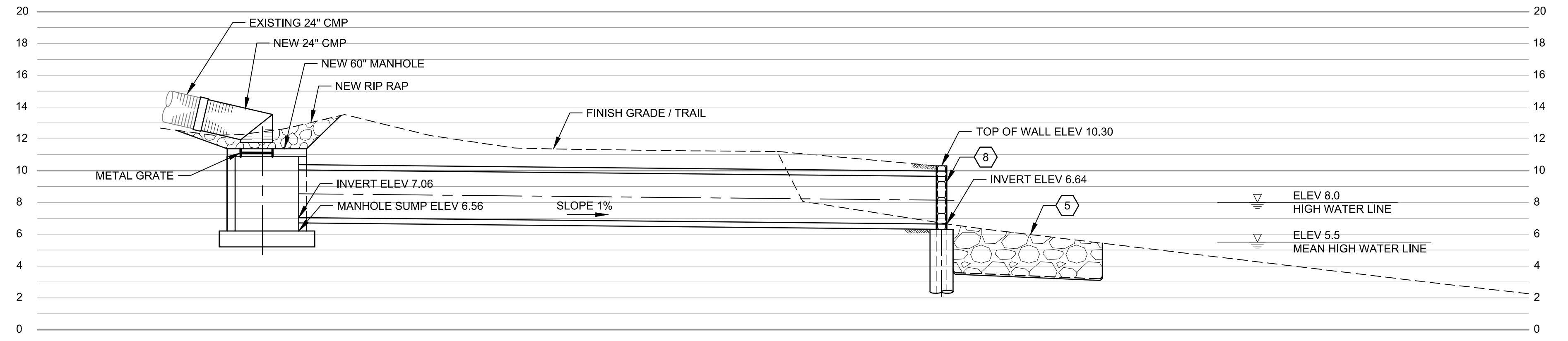
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A SECTION

C-501

1"=5' HORIZONTAL 1"=5' VERTICAL

