

Planning & Zoning Committee of the MidCoast Community Council

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Via email & Fax (3 Pages)

To: **Chris Magnusson**

San Mateo County Planning and Building Division

Mail Drop PLN122, 455 County Center

Redwood City, CA 94063

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re: **PLN2001-00556:** Emergency Permit/Coastal Development Permit for a ~200 ft. long, ~30 ft. high rip-rap seawall adjacent to the Fitzgerald Marine Reserve at 100 Beach St. in Moss Beach. **APN** 037-112-030, 110 & 120.

Chris:

At our meeting of 2/6/02, the Planning & Zoning Committee of the MidCoast Community Council reviewed the above referenced application. We are very concerned that the proper balance be struck between protection of the extremely sensitive marine resources at this site and the protection of the applicant's property and the viable structures that are on it. We had the following comments.

1. For the Emergency Permit: The committee would like to discourage the use a riprap wall unless no other feasible alternative exists to ensure the safety of the threatened structure. We are concerned about the impacts that the construction of such a wall would have on the beach and the Marine Reserve, as well as the potential acceleration of erosion on the unprotected parts of the cliff that a partial wall would inevitably cause. We are also concerned that the placement of a temporary wall, by the fact that it's proper removal would be very difficult and costly, would only give extra incentive to the construction of a full wall later on. Other possibilities we would like to see explored before riprap is used:
 - Use of concrete/wood post, beam and pin structures to hold the cliff in place. We believe similar temporary structures had been used in Marin to hold eroding cliffs in place while permanent measures were designed and that they may have the potential to have less construction impact on the coastal resources at the sight. We are, at this time, trying to gather some further information on these techniques.
 - Relocation of the structures on the bluff-top away from the eroding edge.

Further thoughts on the use of riprap and alternatives may be found below.

2. For the full permit, the committee does not feel that a full length riprap wall should be constructed at this site. It is unfortunate that the seawall structures on either side of this property have probably contributed to the increased erosion rate at the project site, and we feel a real long-term solution needs to deal with the full analysis of the dynamics at play in this area. Specifically, our concerns in this area are:
 - Probably more so than any other factor concerning Coastal Development, the effects of the ocean cannot be isolated parcel-by-parcel without the risk of the piecemeal degradation and destruction of the shoreline.
 - Riprap and hard-surface armoring is at best a temporary solution that only masks any problems of coastal cliff erosion, usually leading to massive and unpredictable failures in the future.
 - Riprap and hard-surface armoring has detrimental impacts on natural beach and tidal pool formation and maintenance systems, something that is apparent at the project site by the lack of beach area on either side where riprap has already been used. The resultant accumulation of large cobble, falling boulders and the destructive action this presents to the tide level habitats and its animal life is too large a price to pay in the balance for the protection of a single structure that has other alternatives to be preserved.
 - Riprap and hard-surface armoring has detrimental impacts to the surrounding properties. The deflection of wave energy will increase the stress on the adjacent areas, leading to the potential accelerated failure of the riprap slopes on either side.
 - This section of the shoreline already has a fairly massive amount of hard-surface seawall construction, to the point where much of the natural beach and tide-level habitat has been destroyed. More riprap will only lead to his destruction, and increase the heavy impacts on the few areas not so protected.
3. The committee would like to see a more comprehensive plan for protection of the cliff studied. This would need to include research into newer, more recently developed technologies that utilize natural “soft” armoring, the modification and/or partial removal of neighboring wall structures to minimize the wave energy focus on this property, and a comprehensive analysis of the long-term detrimental effects of seawall construction on the health and maintenance of the natural marine habitats along his area of our coast.
4. As part of the justification for further protection of this property, and to control any further inappropriate development that might contribute to the further failure of the cliff and further negative impacts on the Marine Reserve, the committee asks that the following conditions be added to approval of any cliff protection:
 - That the property’s parcels be merged to minimize any future excess development

- That appropriate structures on the property be registered as Historical Structures to minimize the potential of their future demolition and replacement with larger, less appropriate development
- That the property incorporate a comprehensive drainage and erosion control plan to minimize any surface level runoff and bluff-top erosion that could contribute to further cliff failure, and that the unused well on the property be certified as properly decommissioned.

Please forward these comments to the appropriate personnel at County Parks, the Coastal Commission, the National Marine Sanctuary, and other agencies that might be involved. Thank you for your help, and please keep us informed of any further developments, redesigns, hearings, approvals or appeals concerning this application.

For the MCC Planning & Zoning Committee,



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cc: David Childers
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