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October 21, 2011

Yolanda Rivas, Branch Chief
Division of Environmental Planning & Engineering
CA Department of Transportation District 4, Attn: Thomas Rosevear
111 Grand Avenue
Oakland, CA 94623

Subject: Draft Environmental Impact Report/Environmental Assessment (DEIR/EA) for the Calera Parkway Widening Project, SCH #2010022042

Dear Ms. Rivas:

Thank you for forwarding the DEIR/EA for the Calera Parkway Widening to our attention for input and comment. The proposed project would widen a 1.3-mile stretch of Highway 1 within the City of Pacifica from four lanes to six lanes to reduce existing, and future, peak-hour traffic congestion. As we have previously stated, the proposed project raises significant issues related to coastal resources and the site is constrained by sensitive habitat and important public views. We appreciate the effort Caltrans and the San Mateo County Transportation Authority (SMCTA) have put into early coordination with Commission staff, and the additional information that has been provided to us will be helpful in evaluating the proposed project during the coastal development permit (CDP) process. However, the DEIR/EA falls short of providing all of the information necessary to evaluate the project for consistency with the City's certified local coastal program (LCP) and the Coastal Act. We urge you to address the following comments in the final EIR/EA or a re-circulated EIR/EA to allow for a more streamlined review of the project during the CDP process.

The project site is located in both the City's CDP jurisdiction and the Commission's retained CDP jurisdiction. The Commission has retained jurisdiction on the former quarry property just west of the project location, which includes portions of the widened roadway that would be located outside of the existing Caltrans right-of-way as well as any proposed mitigation on the former quarry property that meets the Coastal Act definition of development. Although a consolidated permit review process is possible in this case, it could only occur with the agreement of the Commission, the City and the applicant, and the fact that the majority of the project lies within the City's jurisdiction would weigh heavily into any consideration of potentially consolidating the permit review. The standard of review for those portions of the project in the City's jurisdiction is the Pacifica LCP and the public access policies of the Coastal Act, and the standard of review for those portions of the project in the Commission's jurisdiction is the Coastal Act. For a consolidated CDP review of the whole project, the standard of review would be the Coastal Act, with the City's LCP providing non-binding guidance. Please note that the DEIR/EA, on page 41, erroneously states that an "encroachment permit" is required for work extending onto the Commission's jurisdiction; it is actually a CDP that would be required.

In summary, the DEIR/EA does not provide all of the necessary information to evaluate the project for consistency with the Coastal Act and the certified LCP. First, the EIR/EA should fully evaluate a range of alternatives that could meet the purpose and need of the project, including alternatives that would reduce traffic congestion, but would not result in significant adverse impacts on coastal resources. In addition, the EIR/EA should provide all of the information necessary to fully evaluate the proposed alternatives' impacts on biological resources, including on wetlands buffers, sensitive species habitat and native vegetation. The document must also analyze a range of feasible measures to avoid, minimize and mitigate such impacts. Finally, the EIR/EA should include detailed information about measures that would help reduce negative impacts on public views, including open and articulated designs for bridges and railings, landscaping, and aesthetic treatments for medians and retaining walls that would help them blend with the surrounding environment.

Moreover, given the standards of review described above, we strongly recommend that the project's EIR/EA include a table identifying the Coastal Act policies and LCP standards applicable to the project. Such a table should include a preliminary evaluation of the project's conformance with each of the applicable policies and standards.¹ Please consider the following:

Alternatives Analysis

As described in the DEIR/EA, and in this letter, the proposed project could cause adverse impacts to coastal resources, including biological and archaeological resources, public views and water quality. The EIR/EA should fully evaluate project alternatives that avoid these coastal resource impacts as much as possible, while implementing measures to reduce traffic congestion to acceptable levels. The DEIR/EA provides an analysis of three alternatives: (1) the proposed widening project with a narrow median alternative; (2) the proposed widening project with a wide, landscaped median, and; (3) a no project alternative. The two 'build' alternatives both reduce traffic congestion substantially, but appear to result in significant adverse impacts to coastal resources, while the no build alternative would not incorporate any measures to reduce traffic congestion, and would not cause coastal resource impacts. The DEIR/EA also includes a cursory analysis of various alternatives that were considered but rejected without further study because they were determined to be infeasible or ineffective. The EIR/EA should include the studies and analysis that were used to determine these alternatives were infeasible or ineffective as an appendix to the document. In addition, although the rejected alternatives may not be effective enough on their own to make their implementation useful, it appears possible that some combination of the rejected alternatives might be used to create a project that adequately reduces traffic congestion while avoiding coastal resource impacts. Specifically, the following alternatives or combinations of them may be used under a no-build or reduced project alternative: Concept D, the partial widening at Reina Del Mar Avenue; Concept H, signal timing improvements; Concept I, increased or modified public transit service; and Concept J, increased

¹ For an example of a previous table that met this purpose, see the 2006 IS/MND/EA for the Salinas Road Interchange Project, prepared by the U.S. Department of Transportation, the Federal Highway Administration, and Caltrans, which can be accessed here: http://www.dot.ca.gov/dist05/projects/salinas_rd/env_doc.pdf.

school bus service. The EIR/EA should explore the potential to consolidate these or other alternatives into a no-build or reduced project alternative that could utilize various measures to reduce traffic congestion while completely avoiding or substantially reducing impacts on coastal resources.²

Biological Resources

A primary focus of the California Coastal Act (including Public Resources Code sections 30230-30231) and the Pacifica LCP is to protect coastal wetlands. In addition, Section 30240 of the Coastal Act prohibits non resource-dependent development in environmentally sensitive habitat areas (ESHAs) and prohibits resource-dependent development in ESHA that would significantly disrupt habitat values, and Section 30250 requires that new development be located where it would not have significant adverse effects, individually or cumulatively, on coastal resources. Comparable policies are included in the Pacifica LCP.

There is an existing creek with wetlands directly west of the project site that contains aquatic habitat for the California red-legged frog (CRLF), and although the currently proposed alternatives would have no direct impacts on these wetlands, the project would be constructed within 100 feet of them. In addition, the proposed project would result in the loss of 1.27 acres of northern coastal scrub habitat as well as the loss of 4.13 acres of ruderal grassland and .95 acres of non-native/landscaped trees that may provide habitat for various sensitive species. The EIR/EA should provide a detailed description of the project's impacts to these biological resources, as well as proposed measures to avoid, minimize and mitigate them.

First, the EIR/EA should describe the impacts caused by the project due to development within 100 feet of the wetlands and CRLF habitat, including CRLF dispersal corridors, and it should include mitigation measures that could be used to reduce the significance of such impacts. For example, one mitigation measure would be the construction of the proposed retaining wall designed to prevent CRLF from entering the roadway. The EIR/EA should describe other potential mitigation, such as reduced scale project components and the removal of invasive species and restoration of the area with native vegetation, and explain how such measures would enhance habitat values and minimize the impacts of developing in close proximity to these resources.

In addition, the DEIR/EA indicates that the proposed project would impact potentially suitable nesting habitat for four special status bird species – loggerhead shrike, yellow warbler, San Francisco common yellowthroat and white-tailed kite. However, the DEIR/EA lacks any surveys for these species, and therefore, it is not clear what the habitat impacts would be. The EIR/EA should include surveys, performed during applicable breeding periods, to determine the extent to which the project area is used by these species. The EIR/EA should also include an explanation

² Public comments have suggested the possibility of pursuing a staggered school schedule to reduce traffic congestion, and the EIR/EA should evaluate this alternative, and any other feasible traffic reduction measures raised through public comment, in addition to those listed above.

of avoidance, minimization and mitigation measures designed to protect these species, which may include limiting construction to specific windows of time, delaying construction if active nests are identified in close proximity to the project site, providing appropriate buffers between active nests and construction activities, restoring habitat that is temporarily impacted, and mitigating for any permanent loss of habitat. At a minimum, the measures should include installing or restoring native vegetation in all areas subject to temporary impacts and mitigating for the permanent loss of native vegetation at least at a 2:1 ratio.

Finally, with regard to the proposed mitigation for the loss of dispersal habitat for CRLF, San Francisco Garter Snake and Western Pond Turtle, the EIR/EA should include detailed information detailing the impacts (including through maps and supporting survey data), and identifying why the mitigation is adequate to address the project's impacts and how the mitigation would work, including how the property would be protected, what entities would be responsible for ongoing implementation of the mitigation, how maintenance would be conducted, and what performance criteria would be used to ensure the habitat functions as proposed.

Visual Resources

Coastal Act section 30251 requires that new development be sited and designed to protect views to and along the ocean and scenic coastal areas. New development must also be visually compatible with the character of surrounding areas. Consistent with this policy, the Pacifica LCP contains comparable standards to protect visual resources.

Highway 1 at this location has views of the former quarry open space property to the west and urban development to the east. Although views of the ocean on the southern end of the project site are partially obstructed by a row of cypress trees, and at the northern end of the project site, views of the ocean are blocked by the topography, the entire Highway 1 corridor is an important public viewshed unto its own. The proposed project would negatively impact visual resources by expanding paved roadway into an undeveloped area, adding new roadside development such as barriers and retaining walls, and removing existing trees and other vegetation. As previously requested, the EIR/EA should include an evaluation of potential measures to reduce visual impacts, including potential bridge and railing designs that are articulated and open so that public views may be maintained. The EIR/EA should also analyze potential bridge and wall alternatives for consistency with policies protecting both views and biological resources. The DEIR/EA shows several visual simulations that use a plain concrete barrier with a railing that is not articulated. The EIR/EA should evaluate alternative designs that are more aesthetically pleasing, while providing a barrier to prevent sensitive species from entering the roadway, in order to protect biological resources, consistent with the Coastal Act and the City's LCP. If possible, the EIR/EA should also provide information about the proposed railing for the nearby San Pedro Bridge, and evaluate the potential for creating a uniform appearance along this stretch of Highway 1. In addition, the EIR/EA should evaluate aesthetic treatments for other highway features, including above grade retaining walls and median barriers, that blend with the

surrounding coastal setting. In all cases, landscaping must be provided that addresses biological concerns and viewshed issues, including by providing screening, mottling, and softening of view impacts associated with the development.

Water Quality

Coastal Act sections 30230 and 30231 provide for protection of marine resources and water quality, and City LCP policies mimic these requirements. The proposed project has the potential to impact water quality through construction activity and through increasing the area of impervious surface that drains to the creek and out to the ocean.

The DEIR/EA identifies biofiltration strips or swales as the most feasible water quality BMP for the project and describes six locations within the project area that are suitable for their development. However, the DEIR/EA does not identify which of the potential swale locations would be utilized and fails to analyze the effect they would have on water quality, and their capacity to retain stormwater. The DEIR/EA should evaluate proposed water quality BMPs in terms of feasibility and effectiveness, including determining where swales should be located and how they should be designed to ensure water quality is protected and peak wet weather flows are accommodated.

Conclusion

The proposed project raises significant coastal resource issues, especially biological and visual resource issues, that have not been adequately addressed in the DEIR/EA. We strongly recommend that these issues be more thoroughly discussed and analyzed in the final DEIR/EA or a revised and re-circulated DEIR/EA to allow for a complete analysis of the proposed project for consistency with the certified LCP and the Coastal Act. It will be particularly critical for the applicant to identify and analyze potential alternatives to the project, including permutations and combinations of alternatives that can achieve project needs and objectives at the same time as limiting coastal resource impacts as much as possible. If you have any questions or would like to discuss these issues further, please contact me at (831) 427-4863.

Sincerely,



Madeline Cavalieri
Coastal Planner

