

CALIFORNIA COASTAL COMMISSION

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**May 20, 2020**

Honorable City Council
City of Pacific Grove
300 Forest Ave.
Pacific Grove, CA 93950

Subject: Comments on Pacific Grove Shoreline Management Plan

Dear Councilmembers:

Thank you for the opportunity to provide some initial comments and observations on the draft Pacific Grove Shoreline Management Plan (SMP). We have been coordinating with your staff on this plan and will continue to do so as the process unfolds, but we wanted to reach out and give you some general feedback at this stage.

The Pacific Grove shoreline between the first public road, Ocean View Boulevard, and the sea is unique in that it consists of an oceanfront system of lateral and vertical access paths (referred to as the recreational trail), parks, benches, and other free and low-cost recreational amenities. The recreation trail is an extremely popular visitor destination of local and statewide significance that provides unobstructed panoramic views of the Monterey Bay. However, a combination of ground squirrel and other animal activities, wave and tidal action, stormwater runoff and heavy pedestrian use has resulted in localized shoreline erosion. The City has historically sought to remedy this problem through shoreline armoring, and as much as 40% of the shoreline is currently armored.

The goals of the SMP are to identify a long-term alignment for a continuous recreational trail along the entire shoreline that is under the jurisdiction of the City of Pacific Grove, while at the same time looking for opportunities to enhance and offer long-term protection from coastal erosion and sea level rise to the trail and other coastal amenities, public infrastructure, and natural and cultural resources. The SMP ultimately includes ten draft management strategies for the shoreline as well as several additional recommendations and considerations. The SMP further includes design concepts for three specific sites that were identified for their particularly valuable opportunities for providing public access. The SMP shows how each site could be redesigned to better accommodate public access long-term.

At a broad level, we support the proposed public access improvements that would connect several locations along the trail where there are gaps and provide additional public access amenities. That said, with respect to coastal hazards, special consideration must be given to alternatives to existing shoreline protection, and how such alternatives affect coastal resources such as public access parking. The plan also should be adaptive and allow for flexibility in order to be responsive to new information

about sea level rise and coastal hazards in the future. All of these issues will need to be addressed through the coastal permitting process. With that in mind, please consider the following comments and suggestions:

CDP Conditions Requiring SMP

In 2017, a 31-foot-long section of seawall was damaged due to intense wave action during a winter storm. The seawall had previously been subject to potential failure due to various voids and sinkholes in the bedrock foundation.¹ The City submitted a Coastal Development Permit (CDP) application to reconstruct the failed seawall segment to reconnect the remaining portions of seawall (CDP 3-17-0335). Because of the potential impacts from shoreline armoring, it was critical to provide an alternatives analysis based upon the technical and resource data specific to the site. Several structural and non-structural protective alternatives were considered, including relocation of the recreational trail. However, it was determined that additional study and analysis of the feasibility, cost, and consequences of trail relocation were necessary before trail relocation could be pursued in order to allow for an overall plan as opposed to potential piecemeal “spot” relocations of an interconnected recreational trail. As a result, Special Condition 1 limited authorization of CDP 3-17-0335 to a period of three years in order to allow the City time to complete a study of the shoreline in the vicinity of the project site during that time.² The SMP is thus the product required by CDP 3-17-0335.

Furthermore, in addition to submittal of a SMP, CDP 3-17-0335 was conditioned to require submittal of a monitoring report that evaluates the condition and performance of the project and that includes recommendations for any necessary maintenance, repair, changes or modifications. Once the SMP has been finalized, Special Condition 1 requires its submittal to the Commission, along with a complete CDP amendment application to either reauthorize the approved armoring or remove the approved armoring and appropriately restore the affected area. The City should thus submit a CDP amendment for CDP 3-17-0335 that includes the finalized SMP and the required monitoring report in order to reassess reauthorization of the approved shoreline armoring.

Geological Conditions and Hazards

Coastal Act Sections 30235 and 30253 address the use of shoreline protective devices as well as the need to ensure long-term structural integrity, minimize future risk, and to avoid landform-altering protective measures in the future. Together, these policies acknowledge that coastal armoring designed to forestall erosion often alters natural shoreline processes, which ultimately results in the loss of beaches due to the

¹ In 2007, the Commission approved CDP 3-06-024 for repair and replacement of shoreline armoring at 18 different locations along the shoreline in Pacific Grove, which included the area of the 2017 collapse.

² In addition to CDP 3-17-0335, Pacific Grove Land Use Plan policy HAZ-6 and CDP 3-06-024 require the City to develop and submit a comprehensive shoreline management plan.

armoring's adverse effects on sand supply, coastal views, and natural landforms. The Pacific Grove Local Coastal Program (LCP) also contains policies and implementation measures that address climate change, sea level rise, and coastal hazards, including Land Use Plan Section 2.1 and Implementation Plan Section 23.90.140.

As previously discussed, the City of Pacific Grove prepared this long-term shoreline study as required with the objective of identifying how continuous recreational trail access along the shoreline is to be provided while best protecting coastal resources. CDP 3-17-0335 Special Condition 1 specifically requires the study to include a comprehensive alternatives analysis that includes the potential for relocation of the recreational trail, removal of armoring along the shoreline, implementation recommendations, and an analysis of the impacts to coastal resources from retaining the existing armoring structures along this stretch of coast.

While considerations for relocation of the recreational trail away from the shoreline are featured throughout the SMP, evaluation of shoreline armoring removal is limited to a section in the "Other Recommendations and Considerations" chapter. That section states "the SMP considered the potential for the removal of segments of armoring..." but concludes that because the existing armoring protects public infrastructure (i.e. Ocean View Boulevard, parking areas, and the recreation trail), the "shoreline strip is generally very narrow, and most of it is taken up by the public-access infrastructure", that it is "infeasible to remove armoring or even to relocate shoreline trail access (except for several short segments...)". While new or repaired coastal armoring may be appropriate in some areas that are in immediate risk, areas with existing armoring that is not immediately protecting public infrastructure, such as locations where there is substantial undeveloped space available between the current trail location and Ocean View Boulevard, could be opportunities where it may be appropriate to remove existing shoreline armoring. Examples of this can be seen in the SMP design concepts for the parking areas at Sea Palm Avenue and Beach Street. Both design concepts include converting small, off-street parking lots into coastal overlooks where the recreational trail would re-aligned close to the road and coastal amenities such as boardwalks or overlook/fishing spots are shown at the water's edge where coastal armoring is present. In these examples, there may be adequate space to move the recreation trail closer to the road and to provide overlook areas, while still removing existing coastal armoring, especially if the erosion rate in these areas is relatively low. In contrast, the SMP includes a design concept for redesign of the trail across from the Borg's Motel where the existing recreational trail consists of a narrow walkway sandwiched between Ocean View Boulevard and an existing seawall. In this case, the existing coastal armoring is immediately protecting an invaluable section of Oceanview Avenue just south of Lovers Point. Thus, we recommend that an alternatives analysis that includes a more robust analysis of ways to remove, or at least minimize, existing armoring and analyzes impacts to coastal resources from retaining the existing armoring structures be included in the discussion of each of the ten management strategies, where applicable. The City

of Pacific Grove LCP contains policies that outline shoreline armoring alternatives analyses and we recommend that the City follow those protocols for each analysis.

Public Access Parking

Coastal Act Section 30252 requires that development contribute to the improvement of coastal access, in part by providing adequate parking. The Pacific Grove LCP requires that the City improve, relocate, or appropriately manage parking pull-outs along Ocean View Boulevard for the purpose of the restoration and protection of “edge” areas and the prevention of erosion.

Ocean View Boulevard runs parallel to the shoreline and provides coastal access to motorists with a mix of parallel, on-street parking and small, off-street parking lots. As previously discussed, two SMP design concepts include conversion of off-street parking areas into coastal viewing areas. Pacific Grove LUP policy PRA-2 provides protocols for development that could reduce or degrade public parking opportunities near beach access points. With respect to the conversion of off-street parking into coastal viewing areas, please include information such as a description of the number of existing public spaces (with a cumulative total and distinguished by on-street and off-street) for each planning area. Further, for design concepts that reduce the number of parking spaces, please include a distinct discussion that compares that existing number of parking spaces with the number removed (distinguished by on-street and off-street) and describe design concept components intended to mitigate any potential negative impacts and maximize access opportunities.

In conclusion, thank you for the opportunity to review and comment on the SMP. Again, we are supportive of improvements to enhance public access and recreation along the Pacific Grove shoreline, but we are also mindful of the potential adverse impacts to natural shoreline processes and public parking resulting from SMP activities and believe that addressing these issues early on will help facilitate the permitting process. We look forward to working through the above issues as you work through local and Commission permitting processes. Please do not hesitate to contact me at (831) 427-4865 if you have any questions or would like to further discuss these comments.

Sincerely,

A handwritten signature in black ink, appearing to read 'Alexa McCoy', with a long, sweeping tail extending to the right.

Alexandra McCoy
Coastal Planner
Central Coast District Office

From: [REDACTED]
Sent: Wednesday, May 20, 2020 8:56 PM
To: niko@eisenletunic.com; jhalabi@cityofpacificgrove.org
Subject: FW: Comments on the Pacific Grove Shoreline Management Plan

Nike and Joyce,

I wanted to copy you on the e-mail exchange below. I have voiced our concern about this issue (and other issues) during the comment period. I just wanted you to know that I had sent a note to the Mayor and Councilmember Garfield about it since I didn't have an opportunity to speak during the meeting this evening.

Thank you.

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On May 20, 2020, at 8:47 PM, [REDACTED] wrote:

Dear Mayor and Councilmember Garfield,

I attempted to make a comment this evening regarding the Shoreline Management Plan, but despite my signaling a question (raised my hand) I wasn't called upon so I thought I'd send this e-mail instead.

My husband and I have lived in PG for the past 5 years and are proud to call this little community our home.

Respectfully, my comment is regarding the section of the plan that addresses changes between Esplanade Park and Coral Street Beach. The plan currently calls for a number of parking spaces to be eliminated on the water side of Ocean View Blvd. Specifically, we do not understand why it would be necessary to eliminate parking along the Coral Street Beach. Coral Street Beach provides access and is regularly and heavily used by kayakers, divers, surfers, and families that want to spend a day in the sand. This is very similar to activities in the Sea Palm parking area. Eliminating parking along this stretch will cause people to park on the land side of Ocean View Blvd and on the neighboring streets, forcing people to off-load and carry their gear across a very busy, and sometimes very fast moving street. The trail can be easily accommodated without eliminating parking along this area. I have made a similar comment to Niko during the comment period, but I also wanted to share this directly with you based on the lack of discussion during the Council meeting.

Thank you.

From: [REDACTED]
Sent: Saturday, May 23, 2020 5:23 PM
To: niko@eisenletunic.com
Subject: Re: PG Shoreline Management Plan

Hi Niko,

Noted below is an email that we sent to Joyce Halabi regarding the PGSMP, in addition to the comments and recommendations that we sent to you. As noted in the email to Joyce, I recommend that you include graphic/drawings of the proposed changes outlined in the plan so that the reader can better visualize the changes- specifically between Esplanade and Coral Street. The drawings/renderings for the Lovers Point area were excellent and clearly showed the changes that were being proposed for that area. Like the saying goes; "A picture is worth a thousand words"

Please feel free to contact me directly if you have any questions - cell# [REDACTED]

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Hello Joyce Halabi,

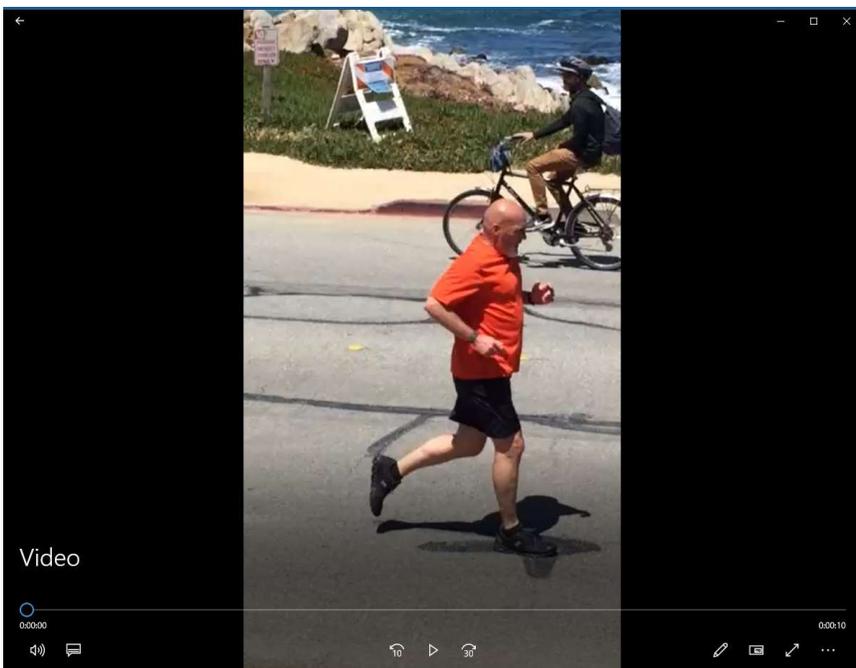
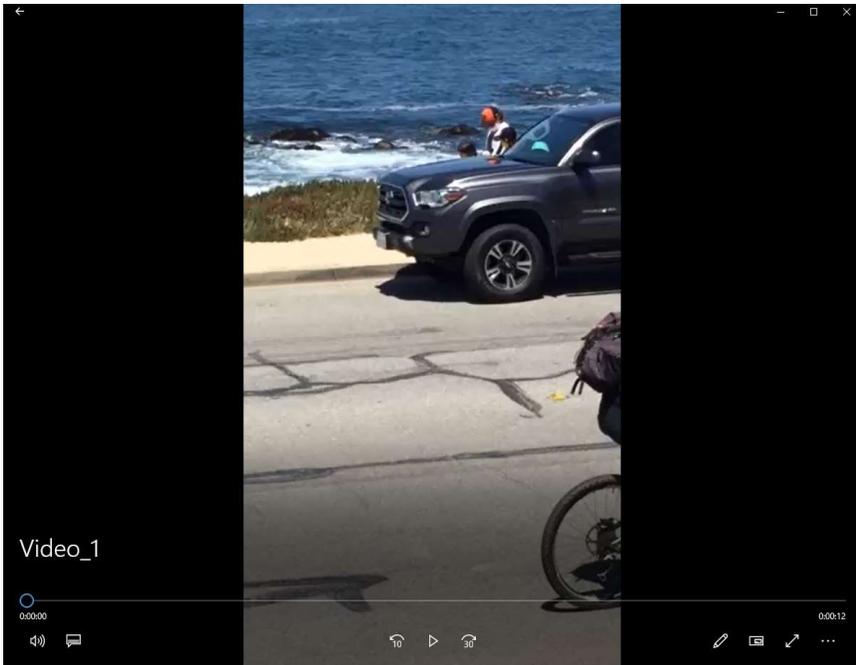
I was not able to attend the virtual meeting regarding the PG SMP. My wife and I were out of town on a business trip and were not able to connect to the meeting. However, I have submitted written comments and recommendations, specifically regarding the proposed pathway expansion at Esplanade to Coral and the relocation of the sewer treatment controls. The text/wording/description was a bit hard to follow as to what was exactly being proposed. The SMP description for the proposed changes for the Lovers Point area included drawing depicting the changes was very clear and easy to understand. I would like to request that in an effort to clearly communicate the proposed change to the section between Esplanade and Coral, that the SMP include a drawing for this section. The drawing should detail location of the path, location of the curb, width of Oceanview, location of the Esplanade sewer control station (with 3D rendering), parking spaces, etc. As I noted in my written comments, my primary concerns are that removing all the off-street parking on the ocean side of Oceanview it will force kayakers, divers, fishermen and visitors to park in the residential areas along Oceanview Blvd, resulting traffic hazards for visitors and residents.

Please free to contact me if you have any questions or would like to discuss my comments and recommendations in more detail.

Best regards,

From: [REDACTED]
Sent: Sunday, May 24, 2020 3:28 PM
To: niko@eisenletunic.com
Subject: Re: PG Shoreline Management Plan

Attached are pictures/videos of the traffic situation/traffic hazards that pose a real and serious hazard to people using the trail, bicyclers, visitors, etc. A very hazardous condition that will only exacerbate the situation by reducing the width of Ocean View Blvd. by removing the curb and moving it out 6-7ft.



From: [REDACTED]
Sent: Tuesday, May 26, 2020 5:59 PM
To: Niko Letunic <niko@eisenletunic.com>
Subject: Fwd: SMP - Protect Coastal Resources

Niko,

This is a companion email regarding the environmental coastal resources part of PG's shoreline.

Best

----- Forwarded message -----

From: [REDACTED]
Date: Tue, May 26, 2020 at 5:25 PM
Subject: SMP - Protect Coastal Resources
To:

Here is a summary of the Coastal Commission's Permit Special Condition; however, I strongly recommend reviewing the CDP's discussion of the natural resources Marine Resources, Sand Supply, etc. and environmental conditions as important factors to consider.

I believe it is very important to advise Niko about the report that should have been contributed directly by the City. Unfortunately, Niko and the general public have been wrongfully omitted from that work.

PACIFIC GROVE CDP 3-17-0335 SEAWALL
<https://documents.coastal.ca.gov/reports/2017/7/w18a/w18a-7-2017-report.pdf>
SHORELINE MANAGEMENT PLAN CONDITION No. 1

The city shall conduct a long-term shoreline study of at least the area between Lovers Point and the intersection between Sea Palm Avenue and Ocean Boulevard (and preferably the entire Pacific Grove shoreline), the objective of which shall be to:

- a) Identify the manner in which continuous recreational trail access along the shoreline is to be provided while best protecting coastal resources.
- b) The study must include a comprehensive alternatives analysis, including:
 1. the potential for relocation of the recreational trail and
 2. removal of armoring along this stretch of coast, and
 3. must include implementation recommendations.
- c) The study must also include an analysis of the impacts to coastal resources from retaining the existing armoring structures along this stretch of coast.
- d) Within 90 days of completion of the long-term shoreline study or within five years of the date of this approval, whichever occurs first, the Permittee shall submit a complete CDP amendment application to the Coastal Commission to either reauthorize the approved armoring or remove the approved armoring and appropriately restore the affected area. The Executive Director may extend the length of this approval an additional two years for good cause.

From: [REDACTED]
Sent: Tuesday, May 26, 2020 5:57 PM
To: Niko Letunic <niko@eisenletunic.com>
Subject: Fwd: 6 shorelines of special interest

Hi Niko,

I think this information and discussion are far too important not to share with you, even if the public input "deadline" has passed. This email Starts with [REDACTED]'s interest to include the natural resource base in your work that came out of an environmental committee that paralleled your work, but was not open to the general public and I believe wrongfully omitted.

----- Forwarded message -----

From: [REDACTED]
Date: Tue, May 26, 2020 at 5:08 PM
Subject: Re: 6 shorelines of special interest
To: [REDACTED]
CC: [REDACTED]

Hi again [REDACTED],

[REDACTED] just came along and said we don't have to give up on getting CWPAC info into the SMP just because the public comment period is over. When it goes to the Coastal Commission, there will be another opportunity for public comment, and we don't have to travel anywhere because their meetings are remote now. Also, the SMP will come back in its final revised form to City Council on June 17, so people can comment then. I also forgot to mention that there were written public comments to Council that we haven't seen, and those are supposed to be posted soon. [REDACTED] sent me his comment—he was very distressed by the biological resources report and the lack of recognition of the diversity of bird life here.

[REDACTED] criticized the inclusion of the section on cleaning up the construction debris on the beaches. He said that it calls for volunteers to do the work which would be a liability. In fact it calls for volunteers to be used to identify the locations that need to be cleaned up. It leaves it up to the City to do the work.

[REDACTED] wants the trails to stay right on the edge.

> On May 26, 2020, at 4:44 PM, [REDACTED] wrote:

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> Hi [REDACTED],

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> Kind of a long answer to tell you, "No":

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> The Shoreline Management Plan is all about maintaining a trail system along our shoreline and the

advisability, or not, of using armoring to accomplish that. ([REDACTED] has the 2017 CCC staff report describing the purpose of the SMP.) The current draft does a very good job of analyzing the arguments for constructing new seawalls, and refuting those arguments! And it's very well organized and user-friendly, so I hope it won't end up on a shelf somewhere.

>

> Unfortunately, the SMP barely acknowledges natural resources—it leaves that to the Biological Resources Report which is summarized in the Technical Studies chapter and which has a lot of boilerplate content and focuses on terrestrial plant communities and special status species, and acknowledges the presence of Black Oystercatchers and Harbor Seals. I believe it's pretty much the same report that the same consultant wrote for the Pt Pinos Trail Project, for which I gave them a lot of information and connected them with [REDACTED]. I can't get it to open on the pgshoreline.org website right now, but I'm sure it was written in 2018 before the wildlife committee work. That report in no way represents PG's shoreline wildlife/marine life like the work that's been done so far for the wildlife protection committee (CWPAC).

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> According to the LCP, the Coastal Parks Plan is supposed to be updated to implement the SMP—or the SMP's recommendations can be implemented through individual projects, if the Coastal Parks Plan isn't ready. The SMP is referred to in HAZ-6, INF-4 and PRA-4 fo the LCP.

>

> [REDACTED] and [REDACTED] made it very clear in an update about the CWPAC at a Council meeting several months ago that they don't want the CWPAC recommendations in the LCP because they say the City can do a better job protecting wildlife separate from the LCP—to me that means they don't want the City to be committed to the recommendations the wildlife committee has been and will be working on. (I'm sure you can put a more positive spin on that.) And even though the Shoreline Management Plan's name sounds like it's taking the natural shoreline into account, and therefore documenting the natural resources, apparently the City, and/or Niko, thinks the document would be too cumbersome with additional information generated by local experts.

>

> I supported the SMP overall, in basically the only oral public comment about it at the virtual Council meeting last week ([REDACTED] carried on her campaign for Dewey to be correctly referred to as Avenue instead of Street), because the process of developing the plan was transparent and inclusive and the outcome was far better than I had feared it might be. It recommends maintaining the existing seawalls/retaining walls, on a specific schedule, rather than letting them deteriorate, in addition to the recommendation to move the trail landward rather than build more seawalls and retaining walls.

>

> I don't know where the CWPAC recommendations can be housed to make sure they're carried out. The Coastal Parks Plan may be the right place. But that's part of the LCP, and this Council doesn't want that. So I hope the CWPAC will discuss what form the guidance document can take to assure that the City will follow through with its recommendations.

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>> On May 25, 2020, at 5:32 PM, [REDACTED] wrote:

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>> Hi [REDACTED],

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>> Did the 6 shoreline stretches of special interest identified and mapped by the Wildlife Protection Committee make it into the Shoreline Management Plan?

>> Asilomar South and North, Great Tidepool, Pt Pinos, Lovers Pt, and Hopkins -- right?

From: [REDACTED]
Sent: Wednesday, May 27, 2020 6:56 AM
To: niko@eisenletunic.com; jhalabi@cityofpacificgrove.org
Subject: Photos from Memorial Day Weekend

Hi Joyce and Niko,

It was very, very crowded this past weekend in this little section of Ocean View Blvd. I wanted to share some pictures showing the parking situation, and even a couple launching their kayak from the pump house location (the Coral Street Beach was very busy). I'm sharing to show how impossible it would be to eliminate parking around the Coral Street Beach, and how dangerous it would be to allow parking on the land side of Ocean View in this section.

Thank you.







From: [REDACTED]
Sent: Wednesday, May 27, 2020 7:22 PM
To: Niko Letunic <niko@eisenletunic.com>
Subject: Pacific Grove Coastal Wildlife Protection Advisory Committee (CWPAC)

Dear Niko,

Please check this out. I understood this was not available and was waiting for its release. Nevertheless, I think you will find it is a valuable reference resource for your work that will strengthen your work, even as a postscript. It is scheduled for completion in Fall 2020.

[Pacific Grove Coastal Wildlife Protection Advisory Committee \(CWPAC\)](#)

From: [REDACTED]
Sent: Friday, May 29, 2020 5:59 PM
To: info@pgshoreline.org
Subject: Re: Relocation of Coral St. pump station equipment and parking around Esplanade Park

I live at 1112 Shell Ave. across Esplanade from the park and am very concerned with the proposal to relocate equipment into the park. I asked for specifics (see below) and received none from the city, Joyce or Niko in their generic responses. We called into the May 20 meeting and again nothing. Residents require knowledge to pass judgement, as it stands no neighbors I've talked with want this relocation. I'm sure there's other viable options for the equipment than slamming into a residential neighborhood, think higher ground in the ivy near the pullout west of Coral beach or the golf course area, not in the middle of a residential/open space recreational area. Thanks for listening and hopefully responding.

> On May 15, 2020, at 5:23 PM, [REDACTED] wrote:

>

> Much more info needed regarding "structure" for electrical components proposed for Esplanade Park by Monterey One Water. Residents around Esplanade Park would be impacted and why not put it west to higher dryer ground at the pullout on the west side of Coral Beach, no residential impact there. No parking along Ocean View will result in increased parking around Esplanade Park, since it's surrounded by residential we should explore parking restrictions to minimize neighborhood impact. See you at the May 20 review.