

Comments

Responses

A2-10

The design of the proposed armoring follows the natural contours of the cliff, including areas of high relief, which attempt to mimic the natural features of existing site conditions.

A2-11

The project proposal does not include armoring all the way to the O’Neill property line because the road immediately upcoast of the O’Neill property is relatively far inland compared to other sections of the road and right-of-way. The project proposal focuses on protecting public property, infrastructure, and public access that are in immediate jeopardy or could be lost to erosion within the next few years. Armoring additional cliff face to replace existing riprap and using public funds to protect private property are not part of the project proposal. Text in the final document has been revised to clarify this point.

A2-12

The design life of the bluff protection structure is 100 years. References to 50 years are a holdover from the Army Corps’ cost/benefit analysis. It is the County’s intent to maintain the armoring for the life of the structure. Mitigation measure 6.1b has been revised to clarify that annual inspection, maintenance, and repair requirements would apply to the entire structure and not just at the ends of the armoring. Mitigation measures that would reduce other potentially significant project impacts to less than significant levels are also proposed in the Revised Final EIS/EIR. The Planning Department believes that these mitigations adequately address project impacts, both in the short term and over time.

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A2-13 12. The sand retention calculations omit two additional sand supply impacts that need to be calculated in addition to the bluff retention calculation: footprint and passive erosion impacts. Please identify and calculate these impacts as well (see previous staff report to the Commission on the Army Corps project for methodology), and update the combined sand supply impact analysis to reflect this information overall.

A2-14 13. The draft document identifies the reduction in sand to the shoreline sand supply system due to the project as insignificant and offers no mitigation. The Coastal Act is structured such that any armoring that is allowed must either eliminate or mitigate this impact, among others (PRC Section 30235). Please recalculate this impact (see erosion rate, footprint, passive erosion, and cribwall comments), and clearly identify mitigation designed to eliminate or proportionately mitigate for it.

Using Full Right-of-Way

A2-15 14. Both the parkway project and proposed seawall development must be consistent with Coastal Act provisions that require public access and recreation opportunities to be maximized and protected. Toward this end, we concur with the project objective of protecting the public right-of-way (r.o.w.) and enhancing it for public use and enjoyment. However, it appears that there remain portions of the r.o.w. that are not proposed to be put to public use. Given the significant role that East Cliff Drive plays in supporting coastal access and recreation opportunities, we recommend that the parkway portion of the project be reconfigured to use the full r.o.w., including moving the inland edge of East Cliff Drive pavement (and/or associated parking/public amenities) to the inland edge of the r.o.w., and making full use of all r.o.w. areas seaward of the inland edge.

Pathways

A2-16 15. It appears to us that a rolled curb along the recreational pathway would be more dangerous to recreational trail users than would be a standard curb because vehicles would more easily roll onto the recreational trail. This concern is compounded under an alternative that keeps traffic one-way in the eastern direction because many motorists are checking the surf conditions and perhaps more likely to roll onto the curb in this sense. It is not clear that a rolled curb is necessary. Even if East Cliff remains one-way towards the east, and if the paved recreational trail areas is ultimately deemed necessary for emergency vehicles (see other comments), then a standard curb would appear sufficient to address such needs while minimizing recreational trail conflicts. Please evaluate an option for a standard curb, and provide clear supporting evidence for any aspects of it deemed infeasible.

A2-17 16. At either end of the Parkway (at 32nd and 41st Avenues), recreational trail users – primarily bicyclists – are required to traverse East Cliff Drive. The draft document recognizes this, but the proposed “bikes must cross” signs do not seem adequate to address this concern. Please identify additional measures that can better address potential crossing conflicts. At a minimum, please evaluate an option where the crossing points at both ends are demarcated

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A2-13

Passive erosion, and its affect on sand supply, is typically associated with bluff protection structures located at the back of wide sandy beaches. The shoreline profile in the project area is characterized by a narrow ephemeral beach, with an intertidal area covered with riprap and concrete rubble. Additionally, as discussed in Section 6.2.1 of the Revised Final EIS/EIR, passive erosion is not likely to occur at the ends of the proposed bluff armoring because the structures would be tied into adjacent structures or to adjacent rock (such as The Hook), thus preventing the phenomenon where adjacent areas of the bluff erode, while the protected area of the bluff remains in place. Consequently, the Revised Final EIS/EIR does not include a sand supply calculation for passive erosion. The text in Section 6.2.1 has been revised, however, to include a calculation of the sand supply lost due to the footprint of the walls. Including this calculation would bring the estimated total annual sand loss to the littoral system to approximately 329 cubic yards/year, or 0.1 percent of the annual littoral drift rate of 300,000 cubic yards. This additional sand loss does not alter the conclusion that sand supply impacts would be less than significant.

A2-14

As reflected in the analysis, the sand supply would be reduced by approximately 0.1 to 0.2 percent of the total amount of sand in the system, which is considered less than significant under CEQA and, therefore, does not require mitigation [see 14 CCR § 15126.4(a)(3)]. If mitigation is necessary under the Coastal Act, it would be more appropriate to include that as a Coastal Commission permit condition rather than a CEQA requirement.

A2-15

The original parkway design was changed to increase use of the right-of-way between 33rd and 34th Avenues by moving the road inland. With this change, there would be only a few feet in the vicinity of the bluff protection structures on the inland side of East Cliff Drive, where the edge of the parkway shoulder would not coincide with the inland right-of-way boundary. The primary focus of the parkway design is to provide pedestrian and bicycle improvements on the ocean side of the road and to maintain a functional road alignment. Moving the road or widening it needs to be considered in terms of any traffic benefits versus the cost to do so. While there may be limited areas beyond 36th Avenue where additional right-of-way is available, (cont'd)

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A2-15 (cont'd)

it is currently used as parking for the surrounding neighborhood. These limited areas were not incorporated into the parkway design because their inclusion does not provide any traffic alignment benefits and would burden the project with the additional cost of moving and reconstructing the road. In addition, moving the road would result in physical disturbance and changes to the character of the area. While RDA has attempted to maximize public access in the project area and to improve public facilities along the ocean side of East Cliff Drive, the community has repeatedly opposed wholesale change to the neighborhood. For these reasons, changes to the inland side of the road would be kept to a minimum.

A2-16

Section 902.2.2.1 of the Uniform Fire Code specifies that fire apparatus access roads shall have an unobstructed width of not less than 20 feet and an unobstructed vertical clearance of not less than 14 feet. Because of limited space within the East Cliff Drive right-of-way and concerns expressed by fire department staff about tire damage to fire trucks and other emergency vehicles, a mountable curb has been proposed. The Live Oak Fire Marshall verbally approved a roadway width less than 20 feet, provided that the design includes a “rolled” curb between the roadway and bike/pedestrian path to allow for adequate fire truck access. The current parkway design includes a modified battered curb, which would provide adequate grade separation while maintaining access for emergency vehicles. This type of curb has been used at other locations in Santa Cruz County, when necessary, such as the Matthews Lane land division on 17th Avenue north of Portola Drive. The proposed parkway design represents a compromise between pedestrian/ bicycle safety concerns and public and emergency access issues.

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A2-17
(cont'd) on the pavement in some way (different pavement markings, striping, coloring, etc.) and run more or less in the same general direction as the recreational trail as much as possible (i.e., angled to the road as opposed to a perpendicular crossing), and stop signs are included that would require traffic to stop.

A2-18 17. The draft document plans show the decomposed granite pathway as discontinuous and significantly narrowed in places. It is not clear why this would be the case. Please evaluate an option that ensures that the decomposed granite is continuous and maintains a minimum 8 foot width, and clearly explain any feasibility issues that would not allow for this option.

A2-19 18. The draft document dismisses the option of a bi-level path system. However, it is not clear from the draft document analysis why this option would not be feasible. It appears that there is sufficient space, and it appears that a bi-level path system would both enhance recreational trail use (separating users with grade change and landscaping) at the same time as limiting the height of the seawall and reducing coastal resource impacts from it, including visual issues. The wave run-up analysis appears to us to indicate that such an option would also adequately address wave run-up issues. Please provide further analysis of a bi-level path system including clearer explanation of any feasibility issues, and whether feasibility is affected by the amount of vertical offset (e.g., ranging from one to three feet at half-foot increments). In addition, should space prove insufficient for a bi-level path the full length of the pathway system, then the further option of dropping the path to a lower grade where space allows should be evaluated. This intermittent bi-level path alternative would have the added effect of providing a less linear bluff edge that may help a seawall of this magnitude appear slightly more natural, again offsetting coastal resource impacts from it.

A2-20 19. Similar to the bi-level path option, it is not clear why the decomposed granite and paved components of the recreational trail system are directly adjacent to one another. Some horizontal separation (with landscaping, etc.) – whether the path were bi-level or not – would appear to better address potential user conflicts, even if such separation is only provided intermittently as space allows (see also above). Please evaluate such an option and explain any feasibility issues.

A2-21 20. A portion of the project appears to be located on the O'Neill property downcoast of the O'Neill residence. Please clarify the arrangements that allow for such development on this property. In addition, there appears to be additional space in this area that could be used to allow for wider path segments and/or landscaping and better path separation – particularly from the adjacent street and parking areas. Please evaluate these options.

A2-22 21. We do not agree that the impact to East Cliff Drive recreational uses during construction would not be significant. On the contrary, a project of this magnitude in such a prominent public recreational area for the duration expected would have significant impacts on public recreational uses. We recommend that the document be modified to indicate that short term construction impacts to East Cliff Drive recreational uses are significant, and in need of mitigation. Potential mitigations may include some of the recommendations in this letter.

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A2-17

The proposed parkway design conforms with applicable roadway safety features, as required by the County traffic engineer. Additionally, the intersection at East Cliff Drive and 33rd Avenue is already a three-way stop, which should help facilitate safe pedestrian and bike crossings at that location.

A2-18

The decomposed granite pathway is less than eight feet wide in only a few locations where there is insufficient space available to accommodate a full eight feet without compromising other roadway requirements, such as adequate turning radii, ramps that comply with Americans with Disabilities Act (ADA) requirements, and the required fire access width (see response to Comment A2-16 above).

A2-19

Several factors make a bi-level path problematic. First, in order to lower the grade of the pedestrian walkway, access in either direction would have to be ramped down at a rate of 1:12 in order to comply with ADA standards. For example, a drop of three feet would require 36 feet of horizontal distance (with a landing at its midpoint) in either direction in order to accomplish such a bi-level configuration. Assuming a level, lowered pathway of 30 or more feet, a distance of over 100 lineal feet would be required, which would need adequate separation between the two parallel paths. In most areas along the top of the bluff, there is insufficient width to provide such a sloped landscaped buffer area (in the example, a three-foot drop would require at least a nine-foot-wide buffer with a maximum 3:1 slope). This width would require eliminating or reducing the widths of portions of the paths to accommodate the grade changes. Alternatively, a railing could be used along the grade-separated paths, but this would create a double railing—one between the bicycle and pedestrian paths and one along the bluff top—which would increase visual impacts. A lowered pedestrian path would also necessitate additional drainage facilities, which would need to discharge behind the wall because the pedestrian path would likely be lower than storm drain lines in the road. Finally, a lowered pedestrian path would create hidden pockets not visible from the road. This could create areas where criminal or unsafe activities could occur because of the lack of public exposure. For these reasons, a bi-level path has not been included in the parkway proposal.

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The parkway design includes horizontal separation and landscaping between the pedestrian walkway and bicycle path wherever feasible. However, there is insufficient space within most of the project area to accommodate this type of separation without reducing the width of the paths or the amount of space between the pedestrian walkway and the edge of the bluff top. Retaining the eight-foot-wide pedestrian and bicycle paths is desirable because it maximizes public access. Additionally, an intentional effort has been made to incorporate as much landscaping as possible on the ocean side of the pedestrian walkway to reduce the need for railings and further mitigate visual impacts through the use of cascading plants and other vegetation. Space constraints limit what features can be incorporated into the parkway design.

A2-21

Proposed parkway features that are depicted on private property are conceptual at this point and may be adjusted as arrangements with property owners are made and permit conditions are developed and implemented. If the project is approved, it would be the County's intent to purchase any easements necessary to construct the improvements. County Real Property staff have advised RDA that state laws and regulations for disposition of private property for public projects prohibit such acquisitions until the appropriate environmental document has been certified by the local decision-making body. At that point in time, options and arrangements can be discussed with private property owners. The areas currently proposed to be used are sufficient to meet the project goals and objectives.

A2-22

Section 4.2.1 of the Revised Final EIS/EIR identifies interference with recreational uses during construction as a significant impact. However, this impact would be mitigated to a less than significant level by implementing Mitigation 4.1 which is designed to keep stairways open and maintain public access to key viewpoints, and by implementing the traffic mitigation measures described in Section 9.2.1.

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A2-23 22. Please evaluate the possibility of increasing the paved trail component of the multi-use path from 8 foot (to 12 or 16 feet, for example) to better accommodate bicyclists and other users traveling in both directions. The 8 feet proposed seems fairly constrained for the amount of use that would occur in this limited space, particularly given that the contra-flow bike lane is not being pursued. With the full use of the right-of-way, it would appear that there is additional space available for a wider path.

A2-24 23. There appear to be significant landscaped areas within the public right-of-way adjacent to the residences located on the seaward side of East Cliff Drive at both Larch Lane and 36th Avenue, and at the O’Neill residence. These areas appear to have been demarked as private, and block visual and physical access to the coast. The draft document does not indicate what would be the disposition of these areas with the project. In tandem with the broader right-of-way issue, these areas need to specifically be evaluated for measures that could be taken to return these areas to public use, whether for more active use (path, benches, picnic tables) or even if only as coordinated landscape areas enhancing the sense of public space adjacent to the public path system.

Roadway

A2-25 24. The draft document describes a fire code requirement for a twenty foot roadway. Please provide a copy of the text of the fire code section that specifies this width. Please also provide copies of any associated fire code text that describes under what circumstances a lesser width could be allowed per the fire code. In sum, we need to have a better sense of what the fire code requires and/or allows in order to effectively evaluate potential design options and feasibility issues.

A2-26 25. By adding four feet of pavement to the roadway section, a twenty-foot road section could be achieved. A twenty-foot road section would allow for two ten-foot travel lanes, one in either direction. In a similar case at West Cliff Drive, two ten-foot travel lanes were deemed sufficient to provide two-way traffic and adequate emergency access. By using the whole r.o.w. area, it appears that there may be sufficient space to provide for a two-way traffic, twenty-foot road section throughout the project area without adversely impacting recreational trail space. Please evaluate such an option, and provide clear supporting evidence for any aspects of it deemed infeasible.

A2-27 26. The draft document does not clearly identify the properties along East Cliff Drive that can only gain access from East Cliff Drive (as opposed to also through the Avenues). Please clearly identify which properties are in this “land locked” situation.

A2-28 27. Please further evaluate the option of closing East Cliff Drive to vehicular access and reconfiguring the East Cliff Drive r.o.w. as a linear park. It appears that the only context within which the draft document describes such potential closure is in relation to a “do nothing” alternative. We would like to see this option considered in conjunction with various other alternatives (such as the full armoring alternative). It appears that there would be some

A2-23

The paved trail is as wide as feasible, given the limited space available between the roadway and the top of the bluff. In order to create a unified design for the parkway, the narrowest sections of the right-of-way essentially determine the width of the roadway, pedestrian walkway, and bicycle path. An eight-foot-wide bike trail is the maximum width that these “pinch points” will allow. Additionally, the parkway improvements include an 8-foot-wide pedestrian walkway next to the paved bicycle trail, for a total width of 16 feet in most locations. As noted above in the response to Comment A2-15, the full extent of the right-of-way would be used where feasible to meet the project objectives.

A2-24

References in the Revised Draft EIS/EIR to “private” uses within the right-of-way were intended to be descriptive only and are not officially sanctioned by the County of Santa Cruz. Use of this term has been deleted from the final document. It has been County policy to retain large trees and other substantial vegetation, whenever possible, in conjunction with road improvement projects in the Live Oak area. Existing mature vegetation screens man-made structures from view, which, in this case, is particularly beneficial to the public viewshed. Retaining such vegetation is also responsive to community comments about avoiding unnecessary changes and maintaining the character of the neighborhood. The Revised Final EIS/EIR does not address disposition of these areas because the project proposal does not include altering these sites. Where possible, the County will take steps to ensure that access within the identified areas remains in public use.

A2-25

See the response to Comment A2-16 above.

A2-26

The one-way vehicular traffic lane along this portion of East Cliff Drive was adopted by the County Board of Supervisors in 1995, and there are currently no plans to take this issue back to the Board for reconsideration. According to the Department of Public Works traffic engineer, County design standards for public roads call for 12-foot-wide travel lanes, so a width of 24 feet would be required for two-way vehicular traffic. Also, it is not standard engineering practice to construct improvements to the precise edge of a right-of-
(cont’d)

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way; typically, a shoulder or buffer is retained between the edge of a road and the limit of the right-of-way for safety purposes. Consequently, there is insufficient room along East Cliff Drive between 32nd and 36th avenues to accommodate two-way vehicular traffic without sacrificing the width of improvements for pedestrians and/or bicyclists. Providing two-way traffic only in short segments of the road, for instance between 37th and 38th avenues, would not make sense from a traffic engineering standpoint and would likely confuse drivers proceeding through the area. For these reasons, a two-way traffic option has not been included in the parkway proposal.

A2-27

There are two properties between 33rd and 34th avenues and three properties between 34th and 35th avenues that can only gain vehicular access and site parking from East Cliff Drive; these are properties with Assessor's Parcel Numbers (APNs) 032-212-18, 032-212-13, 032-211-06, 032-211-07, and 032-211-17. There are three additional residences on the ocean side of East Cliff Drive, between 36th and 41st avenues, that require road access from East Cliff Drive: APNs 032-251-09, 032-182-04, and 032-182-03. Moreover, residents of numerous parcels and residences on the inland side of East Cliff Drive, between 36th and 41st avenues, use the road as their sole means of access, including all residences on Manzanita Avenue and Larch Lane.

A2-28

While the County is aware of proposals to close East Cliff Drive to vehicular traffic, that was not evaluated in this project proposal because it would not meet one of the main project objectives, which is to maintain the road for vehicular and emergency access to the area. As noted above in the response to Comment A2-27, there are numerous residences in the project area that have vehicular access only from East Cliff Drive. CEQA requires evaluation of a reasonable range of alternatives, which has been more than satisfied by the expanded discussion of alternatives in the Revised Final EIS/EIR.

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A2-28 (cont'd) obvious public recreational benefits to such a closure and linear park model, but presumably there would be some other costs (like eliminating the ability to enjoy this stretch of coast without leaving one's vehicle). An expanded analysis of this option is needed to allow for an effective comparison of costs and benefits. Please update the document accordingly.

A2-29

As noted in previous responses, one of the main objectives of the project is to protect the road, and existing vehicular access in the area, while minimizing impacts on local residents. This can best be achieved by maintaining the existing traffic circulation patterns. However, while reversing the flow of vehicular traffic is not part of the project proposal, the project design would not preclude a western traffic direction should that be desired at a future date.

A2-29 28. The arguments against reversing the direction of East Cliff Drive traffic in a one-way scenario are not compelling. It seems clear that whether the traffic flow is to the east or to the west, there would be the "looping" phenomena that is described. The difference would be from which direction the inland loop started and thus corresponding traffic would be increased; it would be at one end of the project area or the other, but not disproportionately. In that sense, a one-way traffic pattern results in some traffic increases as compared to a two-way pattern no matter what. The question is really which direction is better in terms of public access and recreation. There is little question that the western direction is superior in this respect as it allows for more direct views of the ocean and surf without the need for driver's to crane their necks to see it. This also means less potential for recreational conflict because drivers can better mind the road when they are looking forward. Please evaluate a western direction for the one-way East Cliff Drive scenario, and compare it against the eastbound direction. Please ensure that each is compared against a baseline that presumes a two-way East Cliff Drive that is to be made one way (and not a comparison of reversing the traffic flow alone). The evaluation of a western traffic direction should also consider the option of blocking off access to the Avenues from East Cliff Drive where necessary to avoid turning radius issues.

A2-30

See response to Comment A2-15 above. The proposal focuses landscaping on the seaward side of the parkway to maximize reduction of visual impacts and to be responsive to community concerns about maintaining the character of the community as much as possible.

A2-30 29. We note that there is minimal landscaping proposed for the inland side of the parkway. To the extent space is available there, please evaluate options for landscaping pockets and/or landscaping the edge of the roadway on the inland side. Such landscaping would allow for a coherent and coordinated landscape palette and would appear to make the most sense for a public project of this magnitude.

A2-31

The original project proposal included a single type of railing; this design was modified to accommodate previous comments from the Coastal Commission and community to reduce the visual impact of pedestrian railings. The current design minimizes railings through the use of landscaping where sufficient space is available and further reduces the visual impacts of railings through use of split rail fences where safety allows. In areas where the pedestrian path comes close to the bluff edge, safety railings would be required.

Visual Resources

A2-31 30. As detailed in the draft document, railings can result in visual resource impacts. We recommend that railings be minimized to the degree feasible, and that railings that cannot be avoided be as minimal as necessary while also providing for public safety. The draft document indicates that at least two different railing types will be used. We are concerned that different railing types may lead to visual inconsistency. Please evaluate an option where railings that can't be avoided are of the same general type and style, and provide detailed design information (including pictures) of railings to be used.

A2-32

The project proposal does not include changing the fence at Pleasure Point Park. If the County were to remove and rebuild the existing fence, the property owner could still be permitted to construct another fence on the adjacent private property. We agree that the barbed wire on the fence by The Hook is inappropriate, and the County will attempt to improve that fence to the extent allowed by local ordinances.

A2-32 31. The existing fence at Pleasure Point Park (located between the Park and the adjacent residence) blocks coastal views. It appears that this fence is on County property (see Appendix F). The draft document is silent on the disposition of this fence. Please provide description of what is proposed in this area. We recommend that the project include an adjustment to this fence designed to enhance coastal views – including unblocking views.

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- A2-32 (cont'd) Please clearly evaluate such an option. Similarly, at the downcoast end of the Hook, there is a fence topped with barbed wire that also appears to be located on County property. Please evaluate replacing this fence with something less obtrusive (including omitting any barbed wire) and something that is more coordinated with the other parkway improvements (e.g., something similar to the safety railings to be used, low-key cable rail, etc.). These fences must be see through so as to not block seaward views.
- A2-33 32. The draft document is silent regarding the residence on the seaward side of East Cliff Drive that appears to be located mostly in the public r.o.w. downcoast of 38th Avenue. Please provide a history of this residence and associated development, including the seawall below it. Please identify all coastal permits authorizing development here, including all associated supporting documentation (e.g., County permits, approved plans, etc.). The final document should address this apparent anomaly (i.e., a residence in the r.o.w.) and evaluate the range of options to address it (including through removal of portions of it in the r.o.w.). In addition, we note that the seawall and gunnite below this residence are in stark contrast to the types of sculpted camouflaged walls that are more appropriate when hard armoring is necessary, and that a large metal storage box appears to be perched atop the wave return of the seawall. If some portion of the residence and/or its related development is allowed to remain in the public r.o.w., mitigation to offset the visual impacts of its view blockage should at a minimum include removing the storage container and applying camouflaging treatment to the wall.
- A2-34 33. Any vegetation to be used at the top of seawalls to lessen visual impacts should be required to be species that are capable of cascading over the wall and that are native to the area. Please modify mitigation 5.1 accordingly.
- A2-35 34. Mitigation 5.1 states that the seawall ends will be designed to match adjacent bluffs and armoring at these intersection points. We understand the concept of matching to existing natural landforms, but not the idea of matching to existing armoring in this case. The existing armoring structures at the ends of the proposed walls are types that do not harmonize with the surrounding area (rip-rap and gunnite), and the project design should not emulate those unnatural colors, textures, and design features – particularly since they too may be redone over time. Rather, the wall should be made as natural looking as possible throughout, including at the ends. Please modify mitigation 5.1 accordingly.
- A2-36 35. We do not agree that the impact to scenic views during construction would not be significant. A project of this magnitude in such a prominent public viewshed for the duration expected would have significant impacts to public views. We recommend that the document be modified to indicate that short term construction impacts on public views are significant, and in need of mitigation. Potential mitigations may include some of the recommendations in this letter.
- A2-37 36. As the draft document notes, the project will have significant long-term public viewshed impacts. These are partially offset by mitigation. It appears, however, that additional visual

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A2-33

The County recognizes that there are legal issues regarding disposition of the right-of-way and the subject property (APN 032-182-04). The owner has been in contact with the County and discussions have taken place. However, this issue is beyond the scope of the Revised Final EIS/EIR, which is required to evaluate potentially significant environmental impacts on existing site conditions. The right-of-way space currently available in the vicinity of this parcel would fully accommodate the proposed parkway improvements. As with other private/public encroachment issues, the County will continue to seek resolution of these concerns, but they need not affect the proposed parkway project. No additional private uses of the right-of-way are expected in this area, and the two parking spaces depicted on the project plans would be designated as public parking. Because the bluff armoring that protects this residence is clearly within the private parcel, no modifications or changes to the structure are proposed as part of this project. As previously mentioned, available funds would be used only for public purposes.

A2-34

Mitigation 5.1 has been revised to require use of native vegetation. However, it should be recognized that this may limit the cascading effect that could be achieved with a larger selection of species.

A2-35

Mitigation 5.1 has also been revised to clarify that the ends of the shotcrete walls will be designed to look as natural as possible. It was never the intent for the ends to emulate riprap.

A2-36

Section 5.2 of the Revised Final EIS/EIR identifies specific thresholds of significance that were used in evaluating impacts on visual resources. Based on these thresholds, construction would have a significant impact on visual resources if it were to “prevent or substantially impair the view from a sensitive viewpoint for the duration of construction.” In applying this criterion, it is reasonable to consider the temporary nature of construction activities and that significance criteria for temporary effects often allow for greater intensity of impact because of the short-term nature of the impacts. Section 5.2.1 of the Revised Final EIS/EIR acknowledges that construction would (cont'd)

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interfere with views of the bluff from offshore and of the ocean from the bluff and roadway. However, because construction of the bluff protection structures and parkway would be done sequentially and would move from one end of the project area to the other, public access to some viewpoints at the top of the bluff would be maintained throughout construction. Offshore viewers would see construction activity on part but not all of the bluff at any given time. Consequently, although construction activities would impair views to a degree, this impairment would not be substantial nor would it prevent members of the public from accessing at least some viewpoints in the project area. While we recognize that this is a subjective evaluation, it is reasonable and in accordance with CEQA guidance.

A2-37

There are no overhead utility lines on the ocean side of East Cliff Drive within most of the project area. Most of the overhead services extend from the inland neighborhood streets to the last residence adjacent to East Cliff Drive. There is only one overhead wire crossing East Cliff Drive between 32nd and 36th avenues, which serves a street light near Pleasure Point Park. This overhead wire would be located underground as part of the proposed parkway project. There are also overhead wires that serve the O'Neill property between 36th and 37th avenues, the residential property just east of the end of 38th Avenue, and the Clanton property adjacent to The Hook at the end of 41st Avenue. RDA could explore options for undergrounding service to these three parcels, but no funding is currently available for that purpose and there may be constraints associated with utility company engineering requirements. An argument could also be made that undergrounding utility lines to these residences would be an expenditure of public funds for the benefit of private parties.

While it is an interesting idea to add camouflaging concrete texture to the Larch Lane wall as a mitigation for visual impacts, the CEQA analysis does not indicate that such mitigation is necessary. Additionally, there are currently no funds available to accomplish such a task, nor has any engineering feasibility been undertaken. Given funding limitations for the parkway project, public access priorities would indicate that this idea receive less consideration than the proposed pedestrian and bicycle improvements. Because the Larch Lane wall is nearly vertical in profile, it is also questionable whether the visual benefits of camouflaging would outweigh the potential construction

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