

CALIFORNIA COASTAL COMMISSION

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SAN FRANCISCO, CA 94105-2219
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F5

MEMO

DATE: August 9, 2012

TO: Coastal Commissioners and Interested Parties

FROM: Charles Lester, Executive Director
Alison Dettmer, Deputy Director
Mark Delaplaine, Manager, Energy, Ocean Resources and Federal Consistency Division

RE: Consideration of Administrative Authorization (Negative Determination) for National Park Service proposal for sand relocation, Ocean Beach, San Francisco

Attached is a copy of a draft letter to the National Park Service (NPS) indicating staff's intention to administratively concur with a negative determination for the relocation (also called "backpassing") of sand from the north end of Ocean Beach to the south end. Excess sand exists in northern Ocean Beach, and severe erosion is occurring at the south end (between Sloat Blvd. and Fort Funston), threatening the Great Highway and sewage treatment infrastructure. The NPS initially submitted this matter as a consistency determination; however it was submitted too late to be scheduled for the August 2012 Commission meeting. The NPS hoped to be able to commence the activity in August, based on habitat and other restrictions or limitations (including concentrations of overwintering snowy plovers).

A number of City of San Francisco placed, now unpermitted, shoreline protection structures (see list at the end of this memo) exist at south Ocean Beach. On July 13, 2011, the Commission denied a coastal development permit to the City of San Francisco (CDP No. 2-10-033) for the permanent authorization of these structures, some of which were placed under previously-issued emergency permits, and some of which had never been permitted. In its denial findings the Commission made it clear it expected more extensive and clearer commitments to long terms solutions other than armoring. The Commission found that "the short term threat of erosion does not pose an imminent enough threat to existing structures to warrant construction of the proposed temporary structures." That Commission action is currently in litigation.

When the NPS brought the sand management proposal to the Commission staff's attention, the staff indicated concerns over the proposal to cover, even though it would be temporary, currently unauthorized shoreline protection (as well as the authorized temporary placement of sandbags (Emergency permit 2-11-042-G), which have been authorized to remain until May 25, 2013). The NPS considered this alternative but believes "sand needs to be placed over the EQR [Emergency Quarry Rock and other unpermitted structures] in order to meet project objectives." (See Attachment 1 – NPS letter). The Commission staff further recommended that rubble and not-in-use monitoring poles on the beach be removed, and that NPS add a monitoring component. The NPS has agreed to remove the not-in-use monitoring poles, remove hazardous materials, monitor sand movement, and relocate the rubble on the beach. However it has not agreed to remove the rubble entirely from the beach area – rather, the NPS states it would relocate the rubble to serve as temporary bluff toe protection. The NPS states:

Removal of this rubble is beyond the project ability to study the consequences of such an action, and could cause risk of bluff erosion and risk to the CCSF wastewater infrastructure. [and] Because the project has a limited budget, the effort and amount of rubble management would cause less sand to be transported.

Thus the NPS has modified its proposal to include some of the staff's requested changes, and the staff has agreed to bring this matter before the Commission at the August hearing (with the attached draft letter of concurrence), which is the only procedure available that would allow the sand to be relocated this year.

The NPS cites the following three factors as the primary reasons for the need to proceed in August:

1. According to USFWS, the numbers of snowy plovers on OB begin to dramatically increase in September. A later project schedule would likely require additional consultation.
2. Just after the sand backpass project (if approved by CCC), the City (DPW) has contracted out Great Highway repaving project. It would not make sense to repave first and then begin the backpass project with all of the associated heavy equipment and truck traffic.
3. The longer the backpass project is postponed, the greater the chance that the rainy season, storms, more erosion of currently unprotected areas near City sewer infrastructure could lead to the need for emergency actions.

The federal consistency staff has historically used the administrative review (i.e., negative determination) process to encourage beach replenishment, albeit most often in the context of encouraging dredgers to place suitable sandy materials on the beach or in nearshore areas. In this case it is the timing limitations that led staff to consider an administrative

authorization, combined with the fact that at the north end of the beach sand levels have built up to reach the top of the O'Shaughnessy seawall.

The staff understands the NPS' reasons for temporary coverage of unpermitted structures; the NPS' assertions regarding why rubble is not being removed are less compelling. Nevertheless, because the project would improve the beach, provide temporary non-armored protection of existing structures, and decrease (over the next year or possibly several years) the need for placement of additional armoring, the staff is providing a draft recommendation for concurrence with the NPS' proposal, subject to Commission input.

Attached is the letter from the NPS, as well as letters of support for the proposal from Francisco Planning and Urban Research Association (SPUR), and the San Francisco Public Utilities Commission (SFPUC).

Projects described in CDP application No. 2-10-033, which the Commission denied (note – items 5, 6, and 9 below have not been constructed/implemented):

- (1) after-the-fact authorization for placement of 600 feet of quarystone rock revetment, constructed in 1997, and re-grading of the toe;
- (2) after-the-fact reauthorization and refurbishment of 11 beach monitoring posts whose previously authorized Coastal Development Permit (CDP) (2-00-040) expired;
- (3) follow-up authorization for 425 feet of rock revetment placed under Emergency Permit (EP) 2-10-003-G dated February 8, 2010;
- (4) after-the-fact authorization for the construction of an additional 15 feet of rock revetment that was not authorized under EP 2-10-003-G;
- (5) new construction of 70 feet of rock revetment as a southerly extension of the structure constructed under EP 2-10-003;
- (6) construction of two new tangent pile walls (270 feet and 175 feet);
- (7) vertical access, specifically construction of stairs from the top of bluff through the revetment constructed under EP 2-10-003 down to the beach and bluff top public access trail between Sloat and Skyline Boulevards;
- (8) grading, vegetation, drainage improvements/corrections; and
- (9) the removal of existing concrete rubble/rock material that is not functioning as shoreline protection and other debris from the beach.

Attachments

CALIFORNIA COASTAL COMMISSION

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**DRAFT****F5**

August 8, 2012

Frank Dean, General Superintendent
National Park Service
Golden Nate National Recreation Area
ATTN: Steve Ortega
Fort Mason, #201
San Francisco, CA 94123

Re: **ND-030-12**, Negative Determination, National Park Service (NPS)/Golden Gate National Recreation Area (GGNRA), Sand Management Project – Sand Relocation from north to south Ocean Beach, City and County of San Francisco

Dear Mr. Dean:

The Coastal Commission staff has reviewed the above-referenced NPS negative determination for the relocation of 100,000-150,000 cu. yds. of sand from the north end of Ocean Beach to the south end. Excess sand exists in northern Ocean Beach, where sand levels are at historic highs and have reached the top of the O'Shaughnessy seawall, and severe erosion has been continuing over a number of years at the south end (south of Sloat Blvd.), threatening the Great Highway and sewage treatment facility infrastructure. The NPS proposes to load the sand onto approximately 30-cu.-yd.-capacity trucks, and deposit the sand on the beach south of Sloat Blvd. The intent is to provide temporary protection for infrastructure pending completion and implementation of the long term master plan for Ocean Beach. The NPS is working cooperatively with the City; the NPS owns the beach, the SF Public Utilities Commission operates the wastewater treatment facilities, and the SF Dept. of Public Works maintains the Great Highway.

The excavation area is 4200 ft. long and 150-200 ft. wide (and up to 13 ft. deep). Trucks would enter the excavation area off Lincoln Way. The sand would be dumped south of Sloat and spread by dozers and loaders. Prior to any sand placement, receiver areas would be cleared of hazards, rubble, rebar, creosote wood, and asphalt. Southbound lanes on the Great Highway would be closed during construction periods, which would occur between 7:00 am and 8:00 pm; no night or weekend work would occur. A City-approved traffic management plan would be implemented. Project duration is approximately 5 weeks.

The NPS initially submitted this matter as a consistency determination; however it was submitted too late to be scheduled for the August 2012 Commission meeting. The NPS hoped to be able to commence the activity in August, due to habitat restrictions and other logistical limitations. The NPS states it needs to stop working in September. The Commission staff therefore agreed to bring this matter to the Commission's attention, with this draft concurrence letter, at the August Commission meeting (during the Deputy Director's report on Friday, August 10, 2012), which appears to be the only Commission review procedure available that would allow the sand to be relocated this year.

After several discussions between the Commission staff, the NPS, and the City, the NPS has agreed to modify the proposal as follows:

Project Changes: Based on discussions with the Commission and suggestions from the interested community, the following elements have been added to the project: 1) Remove existing monitoring poles and other safety hazards on the beach and bluffs, relocate rubble and rock washed out on beach back to eroded slope for bluff protection, and cut steel rebar protruding from rubble; 2) Separation of hazardous materials from excavated and relocated sand and disposal in a licensed landfill; 3) Develop a monitoring plan.

The federal consistency staff has historically used the administrative review process to encourage beach replenishment, albeit most often in the context of encouraging dredgers to place suitable sandy materials on the beach or in nearshore areas. In this case it is the timing limitations that led staff to consider an administrative authorization, combined with the fact that at the north end of the beach sand levels have reached the top of the O'Shaughnessy seawall.

The Commission staff **agrees** that the proposed activity will temporarily benefit public access and recreation, and not adversely affect coastal zone resources. This concurrence should not be interpreted to condone unauthorized City-placed structures on the beach, and the Commission urges, in no uncertain terms, all parties to work together to implement interim and long range plans to remove unauthorized structures and provide managed retreat solutions. With this understanding, we **concur** with your negative determination made pursuant to 15 CFR 930.35 of the NOAA implementing regulations. Please contact Mark Delaplaine at (415) 904-5289 if you have any questions regarding this matter.

Sincerely,

CHARLES LESTER
Executive Director

cc: CCC – North Central Coast District
City of SF (DPW, PUC)
Corps of Engineers, SF District (both Regulatory and Planning Divisions)
SPUR

DRAFT



United States Department of the Interior

NATIONAL PARK SERVICE
Golden Gate National Recreation Area
Fort Mason, San Francisco, California 94123

IN REPLY REFER TO:
A7627 (GOGA-PLAN)

AUG - 9 2012

Charles Lester
Executive Director
California Coastal Commission
45 Fremont St., Suite 2000
San Francisco, CA 94105

Subject: Ocean Beach Sand Management Project, San Francisco, CA

Dear Mr. Lester:

At the request of Mark Delaplaine, this letter confirms our request to have the Ocean Beach Sand Management Project included in the Director's Report at the upcoming California Coastal Commission (Commission) meeting in Santa Cruz August 8-10. We are seeking federal consistency concurrence on a Negative Determination so that this high priority project of the National Park Service (NPS) can be implemented in August through September 2012. At the suggestion of Mr. Delaplaine, including this on the Director's Report could allow the project to receive Commission approval so that the project can be implemented in the defined work window. The National Park Service (NPS) is hopeful this action would reduce the need to implement more emergency bluff protection measures as have been done in the past by the City and County of San Francisco (CCSF) to protect CCSF wastewater infrastructure and the Great Highway.

Per our recent project submittal to the Commission, on-site meeting, and ongoing discussions with your staff, the following is the proposed project:

- Project Summary: NPS proposes to relocate (backpass from one area of Ocean Beach to another area within the same littoral cell) approximately 100-150,000 cubic yards of aggraded sand adjacent to and west of the O'Shaughnessy Seawall, and relocate it to the erosion areas south of Sloat Boulevard, including Reaches 2 and 3 as indicated on design drawings submitted to Mr. Delaplaine. An unusual amount of aggraded sand is overtopping the Seawall and causing public access and sand maintenance issues for both NPS and the CCSF.
- Project Objectives:
 - 1) Remove sand adjacent to and west of the O'Shaughnessy Seawall at the north end of Ocean Beach in order to reduce future sand maintenance efforts;
 - 2) Maintain public access on promenade and stairwells that have been blocked by sand aggradation;
 - 3) Enhance beach access in the erosion area;

- 4) Provide for bluff protection in high risk areas that threaten CCSF infrastructure; and
- 5) Reduce the need to implement more engineered bluff protection measures in the short-term.

- Means and Methods: Relocation of sand would involve using 30 cubic yard haul trucks and excavators loading at the north end of Ocean Beach and unloading at the south end of Ocean Beach. The haul route would travel through the management vehicle beach access ramp near stairwell 28. The project would take approximately 4-5 weeks to complete and would be done during normal business days/hours and would require the closure of the southbound Great Highway during operating hours. Technical specialists are developing an end-dump plan to strategically place relocated sand in areas where bluff erosion might threaten CCSF infrastructure. A dozer and excavator would shape and place sand in the exact locations.

Project Changes: Based on discussions with the Commission and suggestions from the interested community, the following elements have been added to the project:

- 1) Remove existing monitoring poles and other safety hazards on the beach and bluffs, relocate rubble and rock washed out on beach back to the eroded slope for bluff protection, and cut steel rebar protruding from rubble;
- 2) Separate hazardous materials from excavated and relocated sand and dispose in a licensed landfill;
- 3) Develop a monitoring plan.

Ongoing issues still under discussion between the Commission and the project team include:

- 1996 Emergency Quarry Revetment (EQR): The Commission has suggested to not place sand over the 1996 EQR, which is currently an enforcement action between the Commission and the CCSF. Although this is not a NPS issue, we believe sand needs to be placed over the EQR in order to meet project objectives. Placement of sand over the EQR would enhance the appearance of this stretch of beach and would improve beach width along this section of the erosion area. The area in front of the EQR has the narrowest beach (no beach at most + tides), and placing sand in this area would enhance beach width for public access. We are also concerned, because of the age and shifting of this rock over the last 16 years, by not protecting the EQR with the proposed sand berm, wave energy may be directed to this area causing additional instability and future emergency work.
- Rubble Management: The Commission has suggested removing rubble as part of the project. The rubble is a result of past fill placed for the original Great Highway construction, and although unsightly, it is not part of any Commission enforcement action. This rubble, mostly made up of concrete pieces, is functioning as toe protection for the bluff. Removal of the rubble at this time is beyond the project ability to study the consequences of such an action, and could cause bluff erosion and risk to the CCSF wastewater infrastructure without a long term solution in place. Because the rubble is mostly concrete, the rubble repositions itself in a manner such that it juxtaposes itself shoreward where it does not function as bluff toe protection. The project team feels that the project could do "rubble management" on the rubble that is not serving as bluff toe protection. The shoreward rubble that is furthest from the bluff toe could be pushed toward the bluff to widen the beach and provide better bluff toe protection. After rubble management, sand

would be placed over the rubble for bluff protection and to enhance beach access. Because the project has a limited budget, additional rubble management would also reduce the budget for sand backpass and its effectiveness.

- Beach Monitoring Plan: Bob Battalio, Coastal Engineer from ESA PWA has been working with Commission staff and together they have made the following recommendations to the NPS and CCSF for a monitoring plan:
 1. Sand Characteristics - Grain size analysis for sand that will be moved and sand at the placement locations - only the dry beach component (d16, d50 and d84, or provide the sieve analysis for each location);
 2. As-built plans of sand placement, locations, measurements and volumes placed in each location;
 3. As-built plans of sand removed, with measurements;
 4. Volume of rubble that is removed from the beach during this project, with a map showing areas from which it has been removed;
 5. Volume or amount of hazardous rubble removed from the beach (rebar, rusted metal, etc.);
 6. Volume or amount of debris removed from the beach (asphalt, K-rails, fences, etc.); and
 7. Regular monitoring of changes to both removal areas and placed sand areas – both changes in volume and areal extend, provided monthly for 6 months

Items 1 through 6 above are acceptable to NPS and CCSF. In response to item 7, NPS and CCSF propose the following:

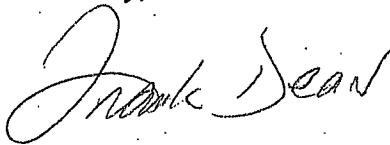
1. Provide estimate of total volume of exposed rubble, on the beach and against the bluff;
2. Perform profile surveys at three roughly equally-spaced stations along the reach 3 fill and at two stations along the reach 2 fill. For each profile, a total of 5 points would be surveyed (see attached sketch for locations along profile). Photographs of the fill would also be taken from a consistent point along each profile during each survey. The profile survey would be repeated near the dates listed below to monitor the performance of the fill through time.
 - a) End of August, 2012, or end of sand placement (post-construction survey)
 - b) September 15, 2012, or two weeks after sand placement (monitor the initial dispersion of the fill volume)
 - c) October 15, 2012 (monitor the response of fill to “normal” wave activity and establish a pre-storm baseline)
 - d) April 15, 2012 (storm profile)
 - e) July 15, 2012 (post-storm profile)
 - f) October 15, 2013 (recovered profile to compare to the initial pre-storm baseline)
3. Coastal Site Conditions Monitoring
 - a) Water levels at tidal stations in the project vicinity should be collected and summarized for the monitoring period.

b) Wave parameters including Hs (significant wave height), Tp (peak wave period), and direction measured at buoys offshore of the project site should be recorded and analyzed to determine the directional wave energy impacting the site during the monitoring period.

- Project Schedule: The Commission has asked whether the project could be delayed until after the September Commission hearings. The project needs to be implemented in August and early September for both natural/biological and administrative reasons. In order to avoid impacts to snowy plovers (a federally protected species), the project needs to be implemented during the time of year when snowy plover numbers at Ocean Beach are at their lowest. These months are July, August, and September. The project was planned to avoid adverse impacts to the snowy plover in consultation with U.S Fish and Wildlife Service (USFWS). USFWS concurrence is based on conducting the project in August and early September. Delaying the project into the fall, increases potential for impacts to snowy plovers and would require additional consultation with USFWS with further delay to the project. We believe to be feasible that the project must be completed in the proposed time frame, in advance of the winter storm season. In addition, the San Francisco Department of Public Works has issued a contract to repave the Great Highway in late September/early October and the truck traffic for this project would not be appropriate on the newly paved surface.

We appreciate the Commission working with us on this very important time-sensitive NPS project. If you have any questions regarding the project please contact Steve Ortega at (415) 561-2841 or Larry Miranda at (415) 561-2842.

Sincerely,



Frank Dean
General Superintendent



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August 6, 2012

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Michael Teitz
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Jeff Tumlin
Steve Vettel
Debra Walker
Cynthia Wilusz-Lovell
Cindy Wu

To Whom it May Concern:

This letter, from the Project Steering Committee of the Ocean Beach Master Plan, is to express support for the Ocean Beach Sand Management Project, proposed by the National Park Service (NPS) and the City and County of San Francisco (CCSF) at Ocean Beach, O'Shaughnessy Seawall and South of Sloat Boulevard.

About the Ocean Beach Master Plan

The Ocean Beach Master Plan is an interagency planning process convened by the San Francisco Planning and Urban Research Association (SPUR) with the goal of providing a long-term vision for Ocean Beach. The Plan includes an ambitious series of recommendations designed to protect infrastructure, restore coastal ecosystems, and improve public access to this unique open space. It addresses coastal management, ecology, and public access through 2050 in the context of severe erosion and climate-induced sea level rise.

The Ocean Beach Master Plan is a non-regulatory document that will be used as a guide for partner agencies. SPUR is in the process of leading a series of implementation studies to translate OBMP recommendations into actual projects. However, it will be several years before the many responsible agencies can take up Master Plan recommendations, complete environmental and regulatory processes, and begin the implementation of restorative action along Ocean Beach.

Comments on the Sand Backpass Project

While the Ocean Beach planning process continues, there is great likelihood of significant erosion as a result of winter storms that will require emergency response to prevent unacceptable environmental consequences and damage to critical city infrastructure, including components of the wastewater treatment system.

At the same time, the beach at the northern end of Ocean Beach has been widening due to various natural and manmade factors. The effects are especially notable during the spring, when shifting winds and currents deposit significant amounts of sand at the north end of the beach. This season, sand has accumulated at unprecedented levels, at times overtopping the O'Shaughnessy seawall, and has resulted in frequent closure of the Great Highway.

The Ocean Beach Sand Management Project, a collaboration between the National Park Service and City and County of San Francisco, will gather excess sand built up along the O'Shaughnessy Seawall and place this sand in the eroded area south of Sloat Boulevard. In addition to reducing the need for more engineered bluff protection measures in the short-term, the project will maintain public access on promenade and stairwells that have

been blocked by sand build-up and enhance beach access, safety, and aesthetics in the south of Sloat Boulevard, especially if all or a portion of the existing revetments are covered.

As the Steering Committee of the Ocean Beach Master Plan, we believe it is critical to undertake a proactive approach to interim coastal and infrastructure protection, targeting the areas with the highest exposure to coastal hazards in the short-term, while limiting near- and long-term environmental impacts. This project represents the kind of improved interagency coordination envisioned by the Ocean Beach Master Plan, addressing two problems simultaneously while improving conditions for the partner agencies and the public. It is consistent with the Master Plan vision and approach, and will help bridge the gap until plan recommendations can be implemented.

Please contact Benjamin Grant, Public Realm and Urban Design Program Manager, San Francisco Planning and Urban Research Association (SPUR) with any questions or requests for information via phone at 415.644.4880 or email at bgrant@spur.org.

Sincerely,

Carmen Chu
San Francisco Supervisor, District 4

Mohammed Nuru
Director
San Francisco Dept. of Public Works

Frank Dean
Superintendent
Golden Gate National Recreation Area

Tanya Peterson
Executive Director and President
San Francisco Zoological Society

Phil Ginsburg
General Manager
San Francisco Dept. of Recreation and Parks

John Rahaim
Director
San Francisco City Planning Dept.

Ed Harrington
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San Francisco Public Utilities Commission

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Ocean Beach Master Plan

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San Francisco Water Power Sewer

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August 7, 2012

Charles Lester, Executive Director
California Coastal Commission
45 Fremont Street, Suite 2000
San Francisco, CA 94105

Dear Mr. Lester:

On behalf of the City and County of San Francisco (CCSF), the San Francisco Public Utilities Commission (SFPUC) and the Department of Public Works (DPW), have been collaborating on the Ocean Beach Sand Management Project. The purpose of this project—spearheaded by the National Park Service and cost-shared with the CCSF—is to gather excess sand built up along the O’Shaughnessy Seawall and place it in areas with sand deficit south of Sloat Boulevard.

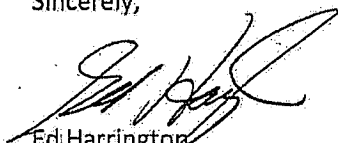
The project will maintain public access on the promenade and stairwells that have been blocked by sand build-up, while enhancing beach access south of Sloat Boulevard. The Ocean Beach Sand Management Project has received widespread support from community organizations, the Board of Supervisors, and Mayor Ed Lee.

One proposed component of the Ocean Beach Sand Management Project is to put sand on top of and/or in the vicinity of the rock revetments that were placed on the beach to protect key components of our city’s wastewater infrastructure in 1996 and 2010. We recognize that the authorization for portions of the rock revetments is an unresolved issue with the California Coastal Commission and we remain committed to addressing this issue in the future.

The City and County of San Francisco continues to be an active participant and supporter of the SPUR Ocean Beach planning process. The next phase of their work includes the development of a coastal management framework that will identify longer-term solutions for the Southern portion of Ocean Beach. Once we have the recommendations from that process, we will be returning to the California Coastal Commission with a proposal for infrastructure protection and environmental sustainability that addresses the rock revetments.

If you have any questions or would like additional information from the SFPUC, please contact Radhika Fox, Director of Policy and Legislative Affairs: rfox@sfwater.org, 415-554-1830.

Sincerely,


Ed Harrington
General Manager

Edwin M. Lee
Mayor

Anson Moran
President

Art Torres
Vice President

Ann Moller Caen
Commissioner

Francesca Vietor
Commissioner

Vince Courtney
Commissioner

Ed Harrington
General Manager

