

COASTAL CONSERVANCY

Staff Recommendation  
September 5, 2024

**KELLER BEACH ACCESS IMPROVEMENTS PROJECT**

Project No. 24-017-01  
Project Manager: Virgilio Cuasay

**RECOMMENDED ACTION:** Authorization to disburse up to \$700,000 to the East Bay Regional Park District to undertake the Keller Beach Access Improvements Project, consisting of constructing public access improvements and amenities at the Keller Beach portion of Miller/Knox Regional Shoreline, Contra Costa County and adoption of findings under the California Environmental Quality Act.

**LOCATION:** Miller/Knox Regional Shoreline, City of Richmond, Contra Costa County

---

EXHIBITS

- Exhibit 1: [Project Location Map](#)
  - Exhibit 2: [Conceptual Design and Photos](#)
  - Exhibit 3: [Project Letters](#)
  - Exhibit 4: [Miller/Knox Regional Shoreline Land Use Plan Amendment Final Environmental Impact Report](#)
  - Exhibit 5: [Mitigation Monitoring, and Reporting Program to the Miller/Knox Regional Shoreline Land Use Plan Amendment Final Environmental Impact Report](#)
- 

**RESOLUTION AND FINDINGS**

Staff recommends that the State Coastal Conservancy adopt the following resolution and findings.

Resolution:

The State Coastal Conservancy hereby authorizes a grant of an amount not to exceed seven hundred thousand dollars (\$700,000) to the East Bay Regional Park District (“the grantee”) to undertake the Keller Beach Access Improvements Project, consisting of constructing public access improvements and amenities at the Keller Beach portion of Miller/Knox Regional Shoreline in the City of Richmond, Contra Costa County.

---

Prior to commencement of the project, the grantee shall submit for the review and written approval of the Executive Officer of the Conservancy (Executive Officer) the following:

1. A detailed work program, schedule, and budget.
2. Names and qualifications of any contractors to be retained in carrying out the project.
3. A plan for acknowledgement of Conservancy funding.
4. Evidence that all permits and approvals required to implement the project have been obtained.

In addition, to the extent appropriate, the grantee shall incorporate the guidelines of the Conservancy's 'Coastal Access Project Standards'.

Findings:

Based on the accompanying staff recommendation and attached exhibits, the State Coastal Conservancy hereby finds that:

1. The proposed authorization is consistent with Chapter 4.5 of Division 21 of the Public Resources Code, regarding the San Francisco Bay Area Program.
2. The proposed project is consistent with the current Conservancy Project Selection Criteria.
3. The Conservancy has independently reviewed and considered the Miller/Knox Regional Shoreline Land Use Plan Amendment Final Environmental Impact Report (PEIR) certified by the East Bay Regional Park District on March 19, 2019 pursuant to the California Environmental Quality Act ("CEQA") and attached to the accompanying staff recommendation as Exhibit 4. The Conservancy has also reviewed the Mitigation Reporting and Monitoring Plan adopted by the East Bay Regional Park District on March 19, 2019 and attached to the accompanying recommendation as Exhibit 5. The Conservancy finds, as described further in the accompanying staff recommendation, that:
  - a. The Keller Beach Access Improvements portion of the Miller/Knox Regional Shoreline project will have potentially significant environmental effects in the areas of Biological Resources, Air Quality, Circulation and Transportation, Contamination or Hazardous Materials. The Conservancy finds that the mitigation measures identified in the PEIR will avoid, reduce, or mitigate these possible significant environmental effects to less-than-significant levels and that these mitigation measures have been required or incorporated into the project.

---

## **STAFF RECOMMENDATION**

### **PROJECT SUMMARY:**

Staff recommends the Conservancy authorize a grant of up to \$700,000 to the East Bay Regional Park District (Park District) to undertake the Keller Beach Access Improvements Project, consisting of constructing public access improvements and amenities at the Keller Beach portion of Miller/Knox Regional Shoreline in the City of Richmond, Contra Costa County (Exhibit 1).

Keller Beach is located near some of Richmond’s most underserved communities, including those in the nearby Iron Triangle neighborhood, which are within a two-mile walk or bike ride. The site includes picnic tables (Exhibit 2, Figure 1), barbeques, restrooms (Exhibit 2, Figure 2), an outdoor shower, horseshoe pits, and landscaping. These amenities are arranged on terraces overlooking the beach and San Francisco Bay (Exhibit 2, Figure 3), and are not fully compliant with the Americans with Disabilities Act (ADA). According to Statewide Parks Program Community FactFinder, the project site is approximately a mile away from both disadvantaged communities (DACs) and severely disadvantaged communities (SDACs). These communities also meet the highest CalEnviroScreen 4.0 thresholds for communities whose residents suffer from high rates of poverty and unemployment and are exposed to several hazardous environmental factors.

Keller Beach, as the sole sandy beach area in Richmond, has functioned as a key recreational space for nearby communities who have need for the benefits it provides. Due to the lack of accessible amenities and the deteriorating conditions of public amenities (Exhibit 2, Figure 4), including restrooms, outdoor showers, and picnic areas, the degraded trail segment connecting Miller Knox Regional Shoreline and Keller Beach, as well as the persistent weed infestations along the beach, access to those benefits is compromised and collectively constitute an environmental justice concern. Lastly, severe storm events during king tides render the existing retaining walls vulnerable to damage.

The proposed project will consist of public amenity upgrades amenities (Exhibit 2, Figure 5) to address the deteriorating state of existing facilities and to provide safe beach access for all visitors. Project activities include the following:

- create a new accessible path from the terraced amenities area to the beach;
- replace or upgrade existing grills, picnic tables, benches, restrooms, outdoor shower, water fountain, interpretive panels, retaining walls, and seat-walls; and
- install a non-slip wheelchair mat.

All facilities constructed through this project are designed for universal accessibility and ADA compliance.

With additional funds, the Park District will also conduct shoreline habitat restoration and trail improvements, but that work will not be part of this authorization. Shoreline habitat restoration will consist of removing approximately 1,500 square feet of invasive plants and installing 34,500 feet of native vegetation in upland areas away from the beach. Trail improvements will pave an existing dirt trail connecting Keller Beach to the Miller/Knox Shoreline’s central field and parking lot.

The project is designed to be resilient to sea level rise. See “Project benefits will be sustainable or resilient over the project lifespan” below.

**Site Description:**

The approximately 1.3-acre Keller Beach (Exhibit 2, Figure 6) project site is located in an existing urban park, Miller Knox Regional Shoreline, a 19-acre park managed and owned by the East Bay Regional Park District that sits at the edge of the San Francisco Bay in the City of Richmond

(Exhibit 1, Figures 1 and 2). The project area is bounded by San Francisco Bay to the west, transportation and commercial retail to the north, and parkland to the east and south. The shoreline park contains a variety of recreation, scenic, natural, and cultural resources, including a 1.1-mile stretch of Bay shoreline, segments of the San Francisco Bay Trail, a kayak launch that is a trailhead for the San Francisco Bay Area Water Trail, picnic areas and turf play areas, two publicly accessible beaches (Ferry Point Beach at the south end and Keller Beach at the north end of the park), and trails that lead visitors to the recreation features throughout the Park. Many of these facilities are old, outdated, and not fully accessible for people with disabilities. Parking at the Keller Beach site is available along Dornan Drive.

**Grant Applicant Qualifications:**

East Bay Regional Park District is highly capable of administering grant funds and similar projects. The Park District is currently administering over 200 grants valued at nearly \$250 million, including a \$532,800 Coastal Conservancy grant for wildfire risk mapping and a \$490,000 Coastal Conservancy grant for McCosker Creek Restoration. Staff are experienced and have recently managed the development of a staging area in Pleasanton Ridge Regional Park and construction of the San Francisco Bay Trail along Doolittle Drive at Martin Luther King, Jr. Regional Shoreline. The Park District is committed to maintaining the facility in perpetuity.

**CONSISTENCY WITH CONSERVANCY'S PROJECT SELECTION CRITERIA:**

The proposed project is consistent with the Conservancy's Project Selection Criteria, last updated on September 23, 2021, in the following respects:

**Selection Criteria**

**1. Extent to which the project helps the Conservancy accomplish the objectives in the Strategic Plan.**

See the "Consistency with Conservancy's Strategic Plan" section below.

**2. Project is a good investment of state resources.**

The project is feasible, and the budget is reasonable. It leverages non-state resources, including local measures. It is consistent with the East Bay Regional Park District Master Plan 2013 and the California Natural Resources Agency's Outdoors for All Initiative.

The project is consistent with the following Outdoors for All Initiative strategy:

- **Strategy 1.1.2:** Create priorities for park-poor communities and disability accessibility within existing funding sources for open space acquisition, development, enhancement, and/or maintenance, including trails and community infrastructure (e.g., restrooms, water fountains, picnic tables and benches, shade structures, lighting, public art, sports facilities, access points and recreational infrastructure for beaches and waterways, and motorized wheelchair charging outlets and other features for people with disabilities) that support healthy, safe, frequent, and culturally relevant recreation for all ages and abilities.

**3. Project benefits will be sustainable or resilient over the project lifespan.**

The project is designed to withstand projected sea level rise and informed by the findings and recommendations of the Park District’s 2022 sea level rise resiliency assessment conducted at Keller Beach. The primary risk identified by the study pertains to impacts from severe winter storms such as those involving king tides. Recommendations to mitigate this risk include upgrades to the existing retaining walls and strategic placement of native plant habitat to protect the shoreline from these storms. All park amenities constructed through this project account for anticipated future sea levels.

**4. Project delivers multiple benefits and significant positive impact.**

According to CalEnviroScreen 4.0, in addition to having low incomes and education levels, residents in the project’s census tract are exposed to poor air quality and suffer from high rates of asthma and cardiovascular disease. The improved park amenities will help offset the inequities faced by the surrounding communities by providing a safe and affordable place for people with limited means to be physically active outdoors. The project will contribute to alleviating multiple stressors within the surrounding communities by addressing the need for additional recreational amenities, access to parks and open space, habitat enhancement and other environmental benefits. The 34,500 square feet of native vegetation planted through this project will sequester carbon, filter stormwater, and provide habitat for nearshore wildlife.

**5. Project planned with meaningful community engagement and broad community support.**

The Park District launched a project website and held an informal open house in October, 2023 at Keller Beach to share proposed plans with the public. Attendees of the event included recreational user groups as well as adjacent community residents. Some of the suggestions from this outreach, including a request for more shade, will be included in the park’s final designs. The district also gathered support from the California State Assembly, California State Senate, Costra Costa County’s Board of Supervisors, Trails for Richmond Action Committee, Urban Tilth, and the East Bay Regional Parks Foundation and are reflected in the letters of support found in Exhibit 3.

**PROJECT FINANCING**

<b>Coastal Conservancy</b>	<b>\$700,000</b>
California Department of Parks and Recreation: Land and Water Conservation Grant (secured)	\$2,300,000
Wildlife Conservation Board (pending)	\$500,000
East Bay Regional Park District: Measures FF, WW, and CC (secured)	\$1,100,000
<b>Project Total</b>	<b>\$4,600,000</b>

Conservancy funding is anticipated to come from a Fiscal Year 2023/24 appropriation from the General Fund to the Conservancy for the purpose of “urgent sea-level rise adaptation and coastal resilience needs using nature-based solutions or other strategies.” (Budget Act 2022, SB

154 as amended by the Budget Act of 2023, SB 101). The coastal resilience funds are available as described in Section 52 of Chapter 258 of the Statutes of 2021, which sets forth a detailed description of the purposes of the climate resilience funds. Eligible uses of these funds include projects that are consistent with the San Francisco Bay Restoration Authority Act. The proposed project is consistent with this funding source because it is a project for the purpose of the San Francisco Bay Area Conservancy Program (Chapter 4.5 of Division 21 of the Government Code), as described further below.

The Park District has committed \$1,100,000 of its own funds from Measures FF, WW, and CC for the project, as well as securing \$2,300,000 from the federal Land and Water Conservation Fund, administered by California State Parks. An application to the Wildlife Conservation Board is listed above.

Unless specifically identified as “Required Match,” the other sources of funding and in-kind contributions described above are estimates. The Conservancy does not typically require matching funds or in-kind services, nor does it require documentation of expenditures from other funders or of in-kind services. Typical grant conditions require grantees to provide any funds needed to complete a project.

**CONSISTENCY WITH CONSERVANCY’S ENABLING LEGISLATION:**

The proposed project is consistent with Chapter 4.5 of Division 21 of the Public Resources Code. Sections 31162, regarding the San Francisco Bay Area Program, authorizes the Conservancy to undertake projects and award grants in the nine-county San Francisco Bay Area that will help achieve the goals of the San Francisco Bay Area Conservancy Program.

Section 31162(a) authorizes the Conservancy to award grants for projects that improve public access to, within, and around the bay, coast, ridgetops, and urban open spaces, consistent with the rights of private property owners, and without having a significant adverse impact on agricultural operations and environmentally sensitive areas and wildlife through completion of regional and local trail systems and through the provision of related facilities, such as picnic areas and staging areas. Consistent with this section, the proposed project will improve facilities and amenities, including beach access, picnic areas and restrooms, supporting existing access to San Francisco Bay at Miller/Knox Regional Shoreline.

**CONSISTENCY WITH CONSERVANCY’S [2023-2027 STRATEGIC PLAN](#):**

Consistent with **Goal 1.1, Commit Funding to Benefit Systemically Excluded Communities**, the proposed project will benefit DACs and SDACs by installing universally accessible and ADA-compliant park amenities at the sole sandy public beach in a park-poor urban area.

Consistent with **Goal 2.3, Expand Accessibility**, the public access amenities will be accessible for people with disabilities and reduce barriers to shoreline access.

Consistent with **Goal 2.5, Recreational Facilities and Amenities**, the proposed project will install picnic tables and benches, BBQ grills, non-slip wheelchair mats, interpretive panels, water fountains, an outdoor shower, and a restroom facility.

**CEQA COMPLIANCE:**

On March 19, 2019, the Park District certified the Miller/Knox Regional Shoreline Land Use Plan Amendment Final Environmental Impact Report (Final PEIR) (Exhibit 4), approved the Miller/Knox Regional Shoreline Land Use Plan Amendment (LUPA), and adopted a Mitigation Monitoring and Reporting Program (Exhibit 5). The full PEIR (PEIR) consists of the Draft PEIR and the Final PEIR. The proposed project is a component of the project analyzed in the Final EIR. The Final PEIR assessed the environmental effects of activities identified in the LUPA, including upgrading amenities at Keller Beach such as the restroom, drinking fountain, outdoor shower, picnic tables, benches; and conducting engineering design development along the planning area to improve resilience features, all of which will be undertaken through the proposed project. For the following resource areas, the Final PEIR indicated that the project will have potentially significant environmental effects: Biological Resources, Air Quality, Circulation and Transportation, Contamination or Hazardous Materials. However, changes or alterations have been required in, or incorporated into, the project that mitigate to less than significant each of the potentially significant effects.

**Findings for Significant Effects that can be Mitigated to Less-Than-Significant Levels**

**Biological Resources**

Potentially significant impacts on biological resources include disturbance to the San Francisco Dusky-Footed Woodrat, a special status wildlife species, from removal of vegetation; and indirect harms from noise generated through construction activities. The LUPA identifies a number of biological mitigation measures to reduce these impacts:

- Mitigation Measure 4.1-1e will implement measures to reduce impacts to the San Francisco Dusky-Footed Woodrat. Within 30 days before implementation of LUPA recommendations involving vegetation removal, a qualified biologist would inspect the potential area of disturbance and adjacent areas for woodrat houses. If none are found, then no additional measures are necessary. If a woodrat house is identified within a work area, an exclusion zone would be erected, and the work area relocated as necessary to allow for minimal disturbance or escape to nearby suitable habitats. If woodrat houses cannot be avoided, individuals are to be relocated after CDFW approval.
- Mitigation Measure 4.11-1 will implement measures to reduce impacts from noise generated through construction at Keller Beach by complying with the City of Richmond's noise ordinance. If construction noise models are below the City's standard of 75 dB L<sub>max</sub> for single-family homes, then no further measures are necessary. If models indicate levels above the single-family home standard, then the Park District must work

with the City to obtain a variance or implement noise reduction measures if the variance isn't granted.

### **Air Quality**

Potentially significant impacts from excavation, grading, vegetation removal, trail improvements, grading and paving, building construction, and building demolition. These construction-related activities were modeled and found not to exceed the Bay Area Air Quality Management District's (BAAQMD) threshold for significance for greenhouse gas emissions of concern.

- Mitigation Measure 4.9-1 will implement measures to reduce impacts from construction-related activities by requiring all construction contractors to implement a dust control plan that shall include Basic Construction Mitigation Measures as recommended by BAAQMD.

### **Transportation and Circulation**

Construction activities and temporary construction vehicle traffic could increase traffic congestion and result in temporary travel disruptions utilizing roadways as well as pedestrian and bicycle facilities in the area.

- Mitigation Measure 4.9-1 will implement measures to reduce impacts from construction-related activities to transportation and circulation by requiring the applicant or construction contractor to consult with the City of Richmond Department of Public Works to determine if a Construction Traffic Control Plan would be required for the project's specific set of activities. If required, the applicant or their construction contractor shall prepare a Construction Traffic Control Plan to the satisfaction of the City of Richmond Department of Public Works, Police Department, and Fire Department. The plan will ensure that acceptable operating conditions, bicycle and pedestrian safety, and emergency access, are maintained.

### **Contamination or Hazardous Materials**

Implementation of the LUPA recommendations would involve grading, excavation, and other ground-disturbing activities which could result in accidental exposure of workers and the public to contaminated soil or groundwater. Records identified one site of documented contamination within Miller/Knox, but has since been remediated. Construction activities may result in accidental exposure to previously undocumented contamination and may result in potentially significant impacts.

- Mitigation Measure 4.4-2 will implement measures to reduce impacts from accidental exposure to underground contamination by requiring the Park District, or their construction contractor, to produce a management plan for accidental exposure to underground contamination before the issuance of grading permits. The plan shall be reviewed and approved by the Contra Costa Health Services (CCHS) before any ground disturbing activities. The management plan shall include mitigation measures for impacts and provisions for best practices should an accidental exposure occur.



Conservancy staff recommends that the Conservancy find that the project, as mitigated avoids, reduces or mitigates the potentially significant environmental effects to a level of less-than-significant and that there is no substantial evidence that the project will have a significant effect on the environment.

Upon approval of the project, Conservancy staff will file a Notice of Determination.