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Prepared April 20, 2018 for the May 10, 2018 Hearing

To: Commissioners and Interested Persons

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Subject: San Francisco LCP Amendment Number LCP-2-SNF-18-0028-1 (Western Shoreline Area Plan)

SUMMARY OF STAFF RECOMMENDATION

The City and County of San Francisco (“the City”) proposes to amend its Local Coastal Program (LCP) Land Use Plan (LUP), also referred to as the Western Shoreline Area Plan, by adding new policies related to coastal hazards. The proposed amendment primarily addresses erosion, flooding, and sea level rise along the Ocean Beach shoreline in San Francisco’s coastal zone and transforms some of the broad visions on these points developed through the Ocean Beach Master Plan planning process¹ into a set of LCP policies that provide direction at a similarly broad level of detail. The proposed amendment requires the City to develop and implement proactive adaptation measures applicable to the most severe areas of erosion south of Sloat Boulevard, including managed retreat and beach nourishment, and outlines a framework for the development of future adaptation measures along the entire shoreline based upon best available science. In that sense, the proposed amendment text is primarily a statement of the City’s overall intentions, and a precursor to further LCP work. At the same time, the amendment includes several requirements applicable to the review of development proposed in potentially hazardous areas. As a whole, the amendment provides objectives and policies designed to help preserve, enhance and restore the Ocean Beach shoreline in light of the significant resources present there, including those related to public access, scenic quality, natural resources, and critical public infrastructure.

The proposed amendment is the outcome of an LCP Local Assistance Grant Award received by the City from the Commission and the State Ocean Protection Council in November 2014, and

¹ The Ocean Beach Master Plan (SPUR, 2012) is a collaborative document that represents the cooperation and involvement of the City/County of San Francisco and a host of federal, state, and local agencies, as well as community stakeholders in an 18-month planning process. The Plan presents recommendations for the management and protection of San Francisco’s Ocean Beach, addressing seven focus areas related to land use in San Francisco’s coastal zone: ecology, utility infrastructure, coastal dynamics, image and character, program and activities, access and connectivity, and management and stewardship.

the proposed policy language has been developed in close coordination with Commission staff, local stakeholders and the public. It is also the City's first attempt at an LCP amendment since the LCP was originally certified in 1986. Given that the original LCP lacks specificity on a range of coastal issues, including issues that have become more pronounced in over three decades since certification, Commission staff have discussed the need for a full LCP update with the City, including one that could transform the conclusions and recommendations of the full Ocean Beach Master Plan into LCP policies. To be clear, however, this amendment is not that update. Rather, it should be considered a first step, and one that is focused on at least providing a baseline of LCP policy language designed to address some of the most pressing issues facing the San Francisco shoreline, which will ultimately lead to the City's long-term goal of a more comprehensive LCP update to respond to changes in circumstances and understandings since original LCP preparation and adoption in the 1980s.

Staff believes that the proposed amendment can be found consistent with the coastal resource policies of Chapter 3 of the Coastal Act, and that it reflects the recommendations of the Commission's 2015 Sea Level Rise Policy Guidance. Indeed, some of the proposed policies codify Coastal Act language directly, including permitting requirements related to armoring and new development in the coastal zone. For example, the proposed text explicitly recognizes the threat posed by coastal hazards and the need to identify appropriate siting out of harm's way, while ensuring that armoring is avoided wherever feasible and that it be accompanied by appropriate mitigation when required to protect existing structures in danger from erosion. Also in line with the Coastal Act's mandate to protect coastal resources, and in light of the fact that the San Francisco shoreline is entirely publicly owned and entirely fronted by public development and infrastructure, the amendment discourages new development in areas subject to an increased risk of coastal hazards by limiting new public development in the Ocean Beach area to that which is required to serve public recreational access or public trust needs, cannot be feasibly sited in an alternative area that avoids current and future hazards, will not require new or expanded shoreline armoring, and will not contribute to bluff instability.

In short, the proposed amendment represents a first step towards a more comprehensive LCP update, and ensures that the City's LCP includes appropriate coastal hazards-related objectives and policies in the interim. No changes to the existing LUP or IP policies and procedures are proposed, so existing policies pertaining to other issues (e.g., coastal access, public recreation, transportation, land use, and habitat protection) remain entirely intact. The proposed text strengthens the LCP, is the result of a healthy collaboration between City and Commission staff, and staff recommends that the Commission approve the amendment as submitted. The motion and resolution are found on page 4 below.

Staff Note: LCP Amendment Action Deadline

This proposed LCP amendment was filed as complete on March 30, 2018. It amends the LUP only, and thus the 90-day action deadline is June 30, 2018 (pursuant to Coastal Act Sections 30512 and 30514(b)). Therefore, unless the Commission extends the action deadline (it may be extended by up to one year per Coastal Act Section 30517), the Commission has until June 30, 2018 to take a final action on this LCP amendment.

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EXHIBITS

Exhibit 1 – City of San Francisco’s Proposed LCP Amendment

I. MOTION AND RESOLUTION

Staff recommends that the Commission, after public hearing, approve the proposed LCP Land Use Plan (LUP) amendment as submitted. This amendment applies to the LUP only, so the Commission needs to make only a single motion in order to act on this recommendation. Thus, staff recommends a **YES** vote on the motion below. Passage of the motion will result in the certification of the LUP amendment as submitted and adoption of the following resolution and findings. The motion passes only upon an affirmative vote of the majority of the appointed Commissioners.

Motion: *I move that the Commission certify Land Use Plan Amendment LCP-2-SNF-18-0028-1 as submitted by the City and County of San Francisco, and I recommend a yes vote.*

Resolution: *The Commission hereby certifies Land Use Plan Amendment LCP-2-SNF-18-0028-1 as submitted by the City and County of San Francisco and adopts the findings set forth below on the grounds that the amendment conforms with the policies of Chapter 3 of the Coastal Act. Certification of the Land Use Plan amendment complies with the California Environmental Quality Act because either 1) feasible mitigation measures and/or alternatives have been incorporated to substantially lessen any significant adverse effects of the plan on the environment, or 2) there are no further feasible alternatives or mitigation measures that would substantially lessen any significant adverse impacts which the Land Use Plan Amendment may have on the environment.*

II. FINDINGS AND DECLARATIONS

A. BACKGROUND

The City and County of San Francisco prepared its Local Coastal Program (LCP), comprised of the Western Shoreline Area Plan and implementing policies of the City's Planning Code, in the early 1980s, and the City's LCP was originally certified by the Coastal Commission on March 14, 1986. There have been no amendments since that time, and thus this current amendment is the City's first attempt at modifying the LCP since it was certified over three decades ago.

In light of issues related to coastal hazards, including as informed by Commission CDP decisions in the late 2000s, the City began to explore options for a planning framework to address erosion and coastal access along the shoreline through the Ocean Beach Task Force and the Ocean Beach Vision Council, culminating in 2012 with the completion of the Ocean Beach Master Plan, prepared by the San Francisco Planning and Urban Research Association (SPUR), an urban planning nonprofit organization. The Ocean Beach Master Plan represents the cooperation and involvement of the City and the Coastal Commission, among other federal, state, and local agencies, as well as community stakeholders in an 18-month planning process addressing seven focus areas: ecology, utility infrastructure, coastal dynamics, image and character, program and activities, access and connectivity, and management and stewardship. In November of 2014, the City was awarded a LCP Local Assistance Grant Award from the Commission to amend its LCP in accordance with the Coastal Act to both better address and account for erosion and sea level rise, as well as to convert the vision presented in the Ocean Beach Master Plan into actionable LCP policies.

The proposed LCP amendment would lay the foundation for implementation of some of the recommendations of the Ocean Beach Master Plan, including those related to the stated goals of addressing sea level rise, protecting infrastructure, restoring coastal ecosystems and improving public access. Specifically, the proposed amendment requires the City to develop and implement proactive adaptation measures applicable to the most severe areas of erosion south of Sloat Boulevard, including managed retreat and beach nourishment, and outlines a framework for the development of future adaptation measures along the entire shoreline based upon best available science. In that sense, the proposed amendment text is primarily a statement of the City's broad intentions, and a precursor to further LCP work. At the same time, the amendment includes several requirements applicable to the review of development proposed in potentially hazardous areas. Overall, the amendment provides objectives and policies designed to help preserve, enhance and restore the Ocean Beach shoreline in light of the significant resources present there, including those related to public access, scenic quality, natural resources, and critical public infrastructure.

Work conducted by the City under the LCP Assistance Grant included a public and agency involvement strategy consisting of regular meetings with an Interagency Advisory Committee, the Ocean Beach Community Advisory Committee, and the general public, to solicit input and address questions or concerns. Existing data and analyses on coastal vulnerability and the potential impacts of sea level rise to the City's coastal zone were integrated to provide a baseline understanding of current and future risk to inform development of LCP policies. Coastal Commission staff worked closely with City staff and stakeholders throughout the grant term,

participating in the public and interagency meetings, as well as individual meetings with City staff, to ensure that LCP policy language reflects the objectives of the Coastal Act and recommendations in the Commission’s Sea Level Rise Policy Guidance. The proposed policies are also best designed to fit the unique landscape of development in San Francisco’s coastal zone where the immediate shoreline is entirely publicly owned and entirely fronted by public development and infrastructure, and thus presents a different set of challenges and objectives than those faced by other local governments, where much, if not most of the shoreline is fronted by private development and houses.

In addition, another unique fact set here is that the City’s LCP has been untouched since it was originally certified in the 1980s. Given that the original LCP lacks specificity on a range of coastal issues, including issues that have become more pronounced in over three decades since certification, Commission staff have discussed the need for a full LCP update with the City, including one that could transform the conclusions and recommendations of the full Ocean Beach Master Plan into LCP policies. To be clear, however, this amendment is not that update. Rather, it should be considered a first step, and one that is focused on at least providing a baseline of LCP policy language designed to address some of the most pressing issues facing the San Francisco shoreline, which will ultimately lead to the City’s long-term goal of a more comprehensive LCP update to respond to changes in circumstances and understandings since original LCP preparation and adoption in the 1980s.

B. DESCRIPTION OF PROPOSED LCP AMENDMENT

The proposed amendment will add a “Coastal Hazards” section to the existing LUP, comprised of an objective and policies that seek to address hazards unique to the coastal zone, including erosion, coastal flooding, and sea level rise. The amendment would transform some of the broad visions on these points developed through the Ocean Beach Master Plan planning process into a set of LCP policies that also provide direction at a similarly broad level of detail. The proposed amendment requires the City to develop and implement proactive adaptation measures applicable to the most severe areas of erosion south of Sloat Boulevard, including managed retreat and beach nourishment, and outlines a framework for the development of future adaptation measures along the entire shoreline based upon best available science. In that sense, the proposed amendment text is primarily a statement of the City’s overall intentions, and a precursor to further LCP work. At the same time, the amendment includes several requirements applicable to review of development proposed in potentially hazardous areas. As a whole, the amendment provides objectives and policies designed to help preserve, enhance and restore the Ocean Beach shoreline in light of the significant resources present there, including those related to public access, scenic quality, natural resources, and critical public infrastructure.

The proposed amendment’s overarching objective, which each of the six proposed policies is designed to implement, states:

Objective 12. Preserve, enhance, and restore the Ocean Beach shoreline while protecting public access, scenic quality, natural resources, critical public infrastructure, and existing development from coastal hazards.

Subsequently, each of the proposed policies is directed towards that broader vision. Specifically, LCP Policy 12.1 outlines specific managed retreat adaptation measures that the City will pursue in response to impacts from shoreline erosion and sea level rise between Sloat and Skyline Boulevards, including incremental removal of shoreline protection devices and other beach obstructions, relocation of public beach parking and restrooms to areas that will not require shoreline protective devices to ensure the safety of those structures, eventual closure of the Great Highway in the area, importation of sand for beach/dune restoration, extension of the coastal trail to Fort Funston and Lake Merced through construction of a multi-use pathway along the shoreline, and consideration of shoreline armoring to prevent damage to wastewater and stormwater infrastructure only when no feasible less environmentally damaging alternatives exist and subject to Coastal Act criteria in other proposed policies.

LCP Policy 12.2 provides an overarching framework for the City as they develop future adaptation measures for the entire shoreline. This policy directs the City to develop sea level rise adaptation measures using the best available science, including preparation of sea level rise vulnerability assessments, hazard maps, and related adaptation plans. The policy requires that such vulnerability assessments and maps be based on sea level rise projections for worst-case mid-century and worst case end-of-century sea level rise in combination with a 100-year storm event, and includes a scenario that does not rely on existing shoreline protection devices. According to this policy, adaptation plans must be designed to minimize coastal resource impacts and prioritize measures that preserve, enhance or restore sandy beach areas (e.g., nourishment, dune restoration, and managed retreat) over new or expanded shoreline armoring. Such plans must also consider a wide range of non-armoring alternatives, as well as the recommendations contained in the Ocean Beach Master Plan.

To further promote soft shoreline protection measures and maintain a sandy beach, LCP Policy 12.3 requires the City to pursue the development and implementation of a long-term beach nourishment program to preserve Ocean Beach as a public recreational resource and protect existing public infrastructure. The City is actively nourishing south Ocean Beach currently through the provisions of CDP 2-15-1357, and is exploring additional options and opportunities, specifically related to use of dredge spoils from the main Golden Gate Bridge channel dredging operations, that could significantly expand such efforts in the future.

Recognizing that sea level rise and erosion are expected to worsen over time, proposed LCP Policy 12.4 describes requirements to ensure that the Ocean Beach shoreline is developed in a responsible manner, including limiting new public development in the immediate shoreline area to that which is required to serve public recreational access and/or public trust needs only if certain criteria are met. The policy also requires that new development and substantial improvements to existing development be sited and designed to minimize risks to life and property, ensure stability and structural integrity, not contribute to geologic instability, and not require protective devices that would alter the natural bluff and shoreline landforms.

The proposed amendment also addresses the potential impacts of proposed shoreline armoring with a policy specifically entitled “Limit Shoreline Protective Devices” that provides stringent requirements for when such armoring may and may not be allowed. Specifically, LCP Policy 12.5 requires shoreline protection devices be avoided, allowing for them only where less

environmentally damaging alternatives are not feasible and where necessary to protect existing structures from a substantial risk of loss or major damage due to erosion. In addition, according to this proposed policy, new or expanded shoreline protection devices are discouraged to solely protect parking, restrooms, or other pedestrian or bicycle facilities. Further, LCP Policy 12.6 outlines measures to minimize impacts of otherwise allowable shoreline armoring, including a requirement that coastal permit applications for reconstruction, expansion, or replacement of existing shoreline protection devices include a re-assessment of the need for the device, the need for any repair or maintenance of the device, any additional required mitigation for unavoidable impacts to coastal resources, and the potential for removal or relocation based on changed conditions. In addition, the policy requires that such protective devices be designed and constructed to avoid, minimize and mitigate impacts to sand supply, sensitive habitat areas, the area's scenic qualities, and coastal access.

Thus, some of the proposed policies codify Coastal Act language directly, including permitting requirements related to armoring and new development in the coastal zone. For example, the proposed text explicitly recognizes the threat posed by coastal hazards and the need to identify appropriate siting out of harm's way, while ensuring that armoring is avoided wherever feasible and that it be accompanied by appropriate mitigation when required to protect existing structures in danger from erosion. Also in line with the Coastal Act's mandate to protect coastal resources, and in light of the fact that San Francisco's immediate shoreline is entirely publicly owned and entirely fronted by public development and infrastructure, the proposed policies discourage new development in areas subject to an increased risk of coastal hazards by limiting new public development in the Ocean Beach area to that which is required to serve public recreational access or public trust needs, cannot be feasibly sited in an alternative area that avoids current and future hazards, will not require a new or expanded shoreline armoring, and will not contribute to bluff instability.

In short, the proposed amendment represents a first step towards a more comprehensive LCP update, and ensures that the City's LCP includes appropriate coastal hazards-related objectives and policies in the interim. No changes to the existing LUP or IP policies and procedures are proposed, so existing policies pertaining to other issues (e.g., coastal access, public recreation, transportation, land use, and habitat protection) remain entirely intact. The proposed text is thereby designed to strengthen the LCP, and should be understood in that context.

Please see **Exhibit 1** for full text of the policies proposed for addition to the LCP through this amendment.

C. CONSISTENCY ANALYSIS

Standard of Review

The proposed amendment affects only the LUP component of the San Francisco LCP. Pursuant to Coastal Act Section 30512.2, the standard of review for LUP amendments is that they must conform with the Chapter 3 policies of the Coastal Act. Applicable Coastal Act policies include:

Section 30235. Revetments, breakwaters, groins, harbor channels, seawalls, cliff retaining walls, and other such construction that alters natural shoreline processes shall

be permitted when required to serve coastal-dependent uses or to protect existing structures or public beaches in danger from erosion, and when designed to eliminate or mitigate adverse impacts on local shoreline sand supply. Existing marine structures causing water stagnation contributing to pollution problems and fish kills should be phased out or upgraded where feasible.

Section 30253. *New development shall do all of the following:*

(a) Minimize risks to life and property in areas of high geologic, flood, and fire hazard.

(b) Assure stability and structural integrity, and neither create nor contribute significantly to erosion, geologic instability, or destruction of the site or surrounding area or in any way require the construction of protective devices that would substantially alter natural landforms along bluffs and cliffs. ...

(e) Where appropriate, protect special communities and neighborhoods that, because of their unique characteristics, are popular visitor destination points for recreational uses.

Section 30210. *In carrying out the requirement of Section 4 of Article X of the California Constitution, maximum access, which shall be conspicuously posted, and recreational opportunities shall be provided for all the people consistent with public safety needs and the need to protect public rights, rights of private property owners, and natural resource areas from overuse.*

Section 30211. *Development shall not interfere with the public's right of access to the sea where acquired through use or legislative authorization, including, but not limited to, the use of dry sand and rocky coastal beaches to the first line of terrestrial vegetation.*

Section 30212(a)(1)(2) *(in relevant part). Public access from the nearest public roadway to the shoreline and along the coast shall be provided in new development projects except where: (1) it is inconsistent with public safety, military security needs, or the protection of fragile coastal resources, (2) adequate access exists nearby...*

Section 30213 *(in relevant part). Lower cost visitor and recreational facilities shall be protected, encouraged, and, where feasible, provided. Developments providing public recreational opportunities are preferred...*

Section 30220. *Coastal areas suited for water-oriented recreational activities that cannot readily be provided at inland water areas shall be protected for such uses.*

Section 30221. *Oceanfront land suitable for recreational use shall be protected for recreational use and development unless present and foreseeable future demand for public or commercial recreational activities that could be accommodated on the property is already adequately provided for in the area.*

Section 30223. *Upland areas necessary to support coastal recreational uses shall be reserved for such uses, where feasible.*

The Coastal Act recognizes that development along the California shoreline can be affected by a wide variety of coastal hazards, ranging from strong storms and wave uprush to erosion, landslides and liquefaction. Therefore, the Act places a strong emphasis on minimizing risks associated with such hazards, and ensuring stability for development over time in such a way as to avoid adverse impacts to natural processes and coastal resources. The latter concept is particularly important at the shoreline and bluff interface where shoreline-altering development is often undertaken to protect private and public development, oftentimes with significant coastal resource consequences. Such shoreline altering development can lead to coastal resource impacts of many types, including adverse effects on sand supply and ecology, public access, coastal views, natural landforms, and overall shoreline beach dynamics on and off site. Thus, the Coastal Act prohibits most shoreline protective devices with new development, and only allows armoring in limited circumstances, subject to impact avoidance and mitigation.

Coastal Act Section 30235 acknowledges that certain types of development (such as seawalls, revetments, retaining walls, groins and other such structural or “hard” methods designed to forestall erosion) can alter natural shoreline processes. Accordingly, along with coastal-dependent uses, Section 30235 authorizes such construction if “required to protect existing structures or public beaches in danger from erosion.” More specifically, Coastal Act Section 30235 requires approval of shoreline protective devices when specified criteria are met. Namely, when 1) they are necessary, 2) to protect existing structures or coastal-dependent uses, 3) in danger of erosion, 4) are designed to eliminate or mitigate adverse impacts to sand supply, 5) mitigate for other coastal resource impacts, and 6) are the least environmentally damaging feasible alternative. Therefore, in cases where shoreline protection can be approved, the coastal permit authorization must preserve public beach access, sand supply, coastal ecosystems, natural landforms, and other coastal resource values.

Relatedly, Coastal Act Section 30253 requires that risks be minimized, long-term stability and structural integrity be provided, and that new development be sited, designed, and built in such a way as to not require the construction of protective devices that would substantially alter natural landforms along bluffs and cliffs. Thus, new development must be sited and designed in such a way as to avoid shoreline armoring over its lifetime that would substantially alter these key natural shoreline landforms while also ensuring that the public will not be exposed to hazardous structures or be held responsible for any future stability issues that may affect the development.

The Coastal Act’s access and recreation policies provide significant direction regarding not only protecting public recreational access, but also ensuring that access is provided and maximized. Specifically, Coastal Act Section 30210 requires that maximum public access and recreational opportunities be provided. This direction to maximize access and recreational opportunities represents a different threshold than to simply provide or protect such access, and is fundamentally different from other like provisions in this respect. In other words, it is not enough to simply provide access to and along the coast, and not enough to simply protect such access; rather such access must also be maximized. This terminology distinguishes the Coastal Act in certain respects, and provides fundamental direction with respect to significant public recreational areas along the California coast that raise public access issues, such as at Ocean Beach.

Beyond the fundamental mandate that public recreational access opportunities be maximized for all in the coastal zone, the Coastal Act provides a series of mechanisms designed to meet that objective and to ensure public access under appropriate time, manner, and place considerations. For example, Section 30211 prohibits development from interfering with the public's right of access to the sea when acquired by legislative authorization or by use. In approving new development, Section 30212(a) requires new development to provide access from the nearest public roadway to the shoreline and along the coast, except in certain limited exceptions, such as when there is existing adequate access nearby. Section 30212.5 identifies that public facilities are to be appropriately distributed throughout an area so as to help mitigate against overcrowding and overuse at any single location. Importantly, Section 30213 requires that lower-cost visitor and recreational access facilities be protected, encouraged, and provided, while giving a stated preference to development that provides public recreational access opportunities. Coastal Act Section 30220 requires that areas that provide water-oriented recreational activities, such as the offshore areas in this case, be protected, while Section 30221 states that oceanfront land suitable for recreational use shall be protected for recreational use and development. Similarly, Section 30223 protects upland areas necessary to support coastal recreational uses. All of these policies are implicated by the proposed coastal hazards policies in one form or another in this case.

Finally, the Coastal Act's various other policies protecting coastal resources such as water quality, sensitive habitat, and visual character are also affected by the proposed coastal hazard policies, especially when considering development (such as armoring) with the potential to affect such resources in potentially hazardous areas. Thus, as a whole, Chapter 3 of the Coastal Act requires that the proposed LUP amendment provide for initial siting and design of development out of harm's way, along with direction on what to do when existing development is endangered by erosion and how best to protect all of the significant coastal resources implicated by coastal hazards along San Francisco's shoreline at Ocean Beach. In short, the proposed LUP text must effectively translate these Coastal Act requirements in a way that addresses the range of coastal hazard issues present in San Francisco's coastal zone.

Coastal Act Consistency Analysis

The City's current 1986 LCP covers coastal access, public recreation, transportation, land use, and habitat protection within the coastal zone. However, the current LCP does not explicitly address coastal hazards or sea level rise at a policy level. The primary intent of the proposed LCP text is to provide a coastal hazards framework given coastal hazards are already impacting public access, recreation, and habitat resources along the San Francisco shoreline. Such hazards are also currently endangering critical public infrastructure and public recreational facilities, while existing shoreline armoring is leading to its own resource impacts, especially in the south Ocean Beach area.

In recent years, erosion of South Ocean Beach damaged the Great Highway and resulted in the loss of public beach parking and related public facilities, and now threatens to damage critical wastewater system infrastructure. Going forward, sea level rise and the increased frequency and severity of coastal storms anticipated due to global climate change is expected to continue to exacerbate these effects, demonstrating a need to approach the management of coastal hazards in a more proactive way. The proposed amendment is designed to help address such hazards by providing measures to begin to implement some of the recommended adaptation methods

identified in the collaborative Ocean Beach Master Plan for south of Sloat Boulevard, which focus on avoiding armoring in favor of nature-based solutions that will enhance public access, recreation, and scenic and visual qualities while still providing protection to important infrastructure. Further, the amendment outlines a framework for the development of future adaptation strategies based on best available science, includes requirements for evaluating and planning future development proposed in hazard areas, and addresses the impacts of new and existing shoreline protective devices for the City's coastal zone.

The large majority of San Francisco's western shoreline is publicly owned. Approximately 85 percent of the 1,771 acres which comprise the coastal zone area are owned and operated either by the City (Golden Gate Park, San Francisco Zoo, and Lake Merced), or the Federal Government (Golden Gate National Recreation Area, which includes all of Ocean Beach itself). The remaining land is privately owned, though this also includes the Olympic Club, which remains an area of deferred certification not subject to the LCP. Thus, San Francisco's LCP does not apply to either the Olympic Club or to areas managed by the National Park Service as part of the Golden Gate National Recreation Area, both of which are directly subject to Commission oversight (through CDP processes for the former, and through federal consistency processes for the latter). Due to San Francisco's unique shoreline configuration, there are no private property owners along the immediate shoreline, and although such inland private properties may indirectly benefit from the existing O'Shaughnessy, Taraval, and Noriega seawalls currently fronting the Great Highway, the City owns and maintains those facilities for public purposes. In addition, the City determined that no buildings are exposed to current coastal flood risk and only seven buildings (including public facilities) are predicted to experience temporary flooding through 2050 based on a high-end estimate of 24 inches of sea level rise by that time. Therefore, the proposed coastal hazard and sea level rise adaptation policies are not expected to affect private development in the City's coastal zone unless and until existing public infrastructure is abandoned or redeveloped to the extent that shoreline armoring is no longer necessary.

Although shoreline protective devices may offer protection to existing structures from ocean waves and storms, the devices can have negative impacts on recreational beach uses, scenic resources, natural landforms, and the supply of sand to shoreline areas, as well as the character of the City's coastal zone. The proposed amendment allows San Francisco's LCP to explicitly acknowledge these issues for the first time, and makes clear that the use of shoreline-altering protective devices must be avoided wherever feasible, while including appropriate mitigations when armoring is necessary and allowable. The LCP amendment also sets up a phased approach that will proactively address hazards in a way that not only limits the need for new armoring, but will result in the removal of armoring in favor of nature-based adaptation strategies including managed retreat and soft shoreline protection. The amendment further ensures impacts of shoreline protective devices are minimized by including a requirement that coastal permit applications for reconstruction, expansion, or replacement of existing shoreline protection devices include a re-assessment of the need for the device, the need for any repair or maintenance of the device, any additional required mitigation for unavoidable impacts to coastal resources, and the potential for removal or relocation based on changed conditions.

As described above, Coastal Act Section 30235 limits the circumstances when armoring must be approved. The proposed LUP policies carry out the requirements of 30235. In particular,

proposed Policy 12.5 states: “Shoreline protection devices such as rock revetments and seawalls shall be permitted only where necessary to protect existing critical infrastructure and existing development from a substantial risk of loss or major damage due to erosion and only where less environmentally damaging alternatives such as beach nourishment, dune restoration and managed retreat are determined to be infeasible.” Policy 12.6, in turn, ensures that any permitted protective devices are designed to avoid, minimize, and mitigate their impacts.

Accordingly, as with Section 30235, shoreline armoring will only be allowed under the LCP when necessary to protect certain existing structures at risk of erosion, where there are no feasible less damaging alternatives, and when impacts are avoided (and where unavoidable they are minimized and mitigated for). San Francisco’s coastal zone has a unique development pattern, and its approach to addressing hazards is also unique. In fact, there is very limited private development in the vulnerable area of San Francisco’s coastal zone (which was largely built out prior to the Coastal Act), and a distinct lack of any residential development in danger from current or reasonably foreseeable future erosion. Thus, the development that is or could become in danger from shoreline hazards in the future is all public infrastructure, such as the Great Highway which extends along the entire beach and which was originally built over a century ago, well before the Coastal Act. The Great Highway has been explicitly recognized by the Commission as a pre-Coastal Act structure that qualifies for consideration of shoreline armoring under the Coastal Act (see, for example, CDP 2-15-1357), and has been deemed in the past to meet the first test for when a shoreline armoring can be allowed consistent with Section 30235. As indicated, the Great Highway runs the length of Ocean Beach, and decisions relative to hazards and armoring will all be understood in that context, as well as in light of prior City commitments and requirements.²

² For example, in the South Ocean Beach area where significant public wastewater treatment infrastructure is in place, decisions must be understood in the context of CDP 2-15-1357 approved by the Commission in 2015. Specifically, in that CDP the Commission approved Phase I of a two-phased project to implement temporary coastal protection measures and a management strategy for the area south of Sloat Boulevard with the simultaneous goal of protecting critical public infrastructure and the coastal environment. Phase I involved temporary authorization of some revetment areas and sand bag structures, as well annual sand relocation from accreting areas of North Ocean Beach to the erosion hotspots identified at South Ocean Beach south of Sloat, and the placement of stacked sandbags on an as-needed basis. Phase I was designed as an interim project to be implemented while the Phase II long-term solution is developed for submittal and Coastal Commission action. The long-term solution envisions narrowing and ultimately abandoning the Great Highway south of Sloat, removing temporary armoring, and ultimately managing shoreline retreat in this area differently, all as called out in the Ocean Beach Master Plan. CDP 2-15-1357 requires the San Francisco Public Utilities Commission (PUC) to develop their preferred long term plan for Coastal Commission consideration consistent with the deadlines established in the California Coastal Protection Network and the City and County of San Francisco Settlement Agreement, and no later than the end of 2021 when authorization of the temporary measures expires, and to permit and implement the plan thereafter. The PUC’s preliminarily identified preferred approach would involve the removal of existing revetments and other shoreline protection measures that are currently in place, the restoration of the bluffs and beach, and the phased construction of a low-profile shoreline protection device landward of the current bluff face and adjacent to the Lake Merced Tunnel (SPUR/ESA PWA, April 24, 2015). However, the PUC is in the midst of an alternatives analysis and assessment that includes a variety of options, including relocation of affected infrastructure inland, and their plans may change moving forward. The main point, though, is that the adaptation discussion and project for South Ocean Beach is in process under those CDP provisions, all of which dovetails with the City’s proposed LCP on these points.

The second factor unique to San Francisco is that even though such development may qualify for protection under Section 30235, the City has gone further to set up a phased approach that will proactively address hazards in a way that not only limits the need for new armoring, but will result in the removal of existing armoring in favor of nature-based adaptation strategies for managed retreat and soft shoreline protection. Finally, the amendment includes a robust framework for requiring mitigation, not only for sand supply impacts, but also for other impacts to public access caused by shoreline protection. These factors, together, properly address the provisions of Section 30235, particularly given the development context in San Francisco.

Likewise, the proposed policies ensure consistency with Coastal Act Section 30253 by prohibiting new development that would require shoreline armoring for protection and requiring new development to ensure structural stability without the use of shoreline armoring that alters natural landforms. Furthermore, new development is discouraged in areas that would be exposed to an increased risk of coastal hazards through policies that limit new public development in the Ocean Beach area to that which is required to serve public recreational access or public trust needs, cannot be feasibly sited in an alternative area that avoids current and future hazards, will not require a new or expanded shoreline protective device, and will not contribute to bluff instability. Finally, in developing policies that implement some of the primary goals and approaches outlined in the Ocean Beach Master Plan, the proposed LCP will set up a phased approach that will proactively address hazards in a way that not only limits the need for new armoring, but will result in the removal of armoring in favor of nature-based adaptation strategies. In combination with this phased approach, the proposed LCP commits the City to develop sea level rise vulnerability assessments, adaptation plans, sea level rise hazard maps, and a long term beach nourishment program, thereby ensuring that Ocean Beach and the recreational opportunities it affords will be preserved over short-, medium-, and long-term horizons.

Overall, the proposed amendment adds adaptation policies to the LUP, recognizes the unique pattern of development and hazards in the City's coastal zone, and provides a framework for implementation in both the short and long term. The proposed amendment represents a first step towards a more comprehensive LCP update, and ensures that the City's LCP includes appropriate coastal hazards-related objectives and policies in the interim. For these reasons, the proposed LUP amendment conforms with the policies of Chapter 3 of the Coastal Act. While not the standard of review, certification of this amendment will additionally satisfy requirements of grants awarded to the City by the Coastal Commission and State Ocean Protection Council, and will help San Francisco's LCP implement the recommendations within the Coastal Commission's 2015 Sea Level Rise Policy Guidance.

D. CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA)

The Coastal Commission's review and development process for LCPs and LCP amendments has been certified by the Secretary of the Natural Resources Agency as being the functional equivalent of the environmental review required by CEQA. Local governments are not required to undertake environmental analysis of proposed LCP amendments, although the Commission can and does use any environmental information that the local government has developed. CEQA requires that alternatives to the proposed action be reviewed and considered for their potential impact on the environment and that the least damaging feasible alternative be chosen as the alternative to undertake.

The City and County of San Francisco determined that adoption of this LCP amendment is exempt from environmental review under CEQA pursuant to Public Resources Section 21080.9. Nevertheless, the Commission is required in an LCP submittal or, as in this case, an LCP amendment submittal, to find that the LCP as amended conforms with CEQA provisions. This report has discussed the relevant coastal resource issues with the proposed amendment and concludes that the amendment would not result in an intensification of land uses, or have adverse impacts on coastal resources. The proposed LCP amendment promotes consideration of a variety of adaption measures and solutions to avoid and minimize hazards, as well as to minimize impacts of shoreline armoring. As such, there are no additional feasible alternatives or feasible mitigation measures available which would substantially lessen any significant adverse environmental effects which approval of the amendment would have on the environment within the meaning of CEQA. Thus, the proposed amendment will not result in any significant environmental effects for which feasible mitigation measures have not been employed consistent with CEQA Section 21080.5(d)(2)(A).

APPENDIX A – SUBSTANTIVE FILE DOCUMENTS

- Ocean Beach Master Plan (SPUR, 2012)
- Sea Level Rise Adopted Policy Guidance (CCC, 2015)
- Sea Level Rise Existing Data and Analyses Technical Memorandum (ESA, 2016)

APPENDIX B – STAFF CONTACT WITH AGENCIES AND GROUPS

- City and County of San Francisco Planning Department
- City and County of San Francisco Public Utilities Commission
- Surfrider Foundation, San Francisco Chapter
- San Francisco Bay Area Planning and Urban Research Association (SPUR)
- San Francisco Recreation and Parks Department
- San Francisco Zoo
- San Francisco Municipal Transportation Agency
- San Francisco County Transportation Agency
- San Francisco Public Works
- Sierra Club San Francisco Bay Chapter
- United States National Park Service - Golden Gate National Recreation Area (GGNRA)