

CALIFORNIA COASTAL COMMISSION

NORTH CENTRAL COAST DISTRICT
455 MARKET STREET, SUITE 300
SAN FRANCISCO, CA 94105
PHONE: (415) 904-5260
FAX: (415) 904-5400
WEB: WWW.COASTAL.CA.GOV



W14a

LCP-2-PAC-20-0036-1 (City of Pacifica LUP Update)

MARCH 8, 2023

CORRESPONDENCE

KoppmanNorton, Julia@Coastal

From: Murdock, Christian <cmurdock@pacificagov>
Sent: Monday, January 23, 2023 9:14 AM
To: KoppmanNorton, Julia@Coastal
Cc: Ringuette, Oceane@Coastal; Rexing, Stephanie@Coastal; Cervantes, Stefanie
Subject: RE: Pacifica LUP Update

Hi Julia,

Thank you for the update and the thorough explanation of where the Coastal Commission staff stands on its review of our LCLUP amendment submittal. I am aware of your previous efforts to communicate requested changes to gain CCC staff's support. I tried to explain following the LCLUP amendment submittal that City staff was not in a position to negotiate the contents of the LCLUP amendment following City Council approval.

Once the CCC staff makes its formal recommendation, City staff looks forward to engaging in the public process with the CCC itself during the hearing and, following any action, with the City Council to determine whether they will accept the suggested modifications. The irony of this situation is that if the City and CCC cannot come to agreement, we will be forced to continue relying on the 1980 LCLUP which I do not think is in either agency's best interests.

Lastly, I am sad to report that last Friday, 1/20, was Bonny O'Connor's last day with the City of Pacifica. Please include me and Senior Planner Stefanie Cervantes, cc'd, on any correspondence which you would have previously sent to Bonny. Thank you.

Regards,

Christian



CHRISTIAN MURDOCK, AICP
PLANNING DIRECTOR
CITY OF PACIFICA | PLANNING DEPARTMENT
540 Crespi Drive, Pacifica, CA 94044
Phone: (650) 738-7341 | cmurdock@pacificagov

From: KoppmanNorton, Julia@Coastal <julia.koppmannorton@coastal.ca.gov>
Sent: Wednesday, January 18, 2023 11:23 AM
To: Murdock, Christian <cmurdock@pacificagov>; O'Connor, Bonny <boconnor@pacificagov>
Cc: Ringuette, Oceane@Coastal <oceane.ringuette@coastal.ca.gov>; Rexing, Stephanie@Coastal <Stephanie.Rexing@coastal.ca.gov>
Subject: Pacifica LUP Update

[CAUTION: External Email]

Hi Christian and Bonny,

Hope your 2023 is off to a great start. We have been working on the City's LUP update submittal, and as we have indicated throughout the LCPA process, there are a number of modifications that we will be suggesting to the Commission in order to make the proposed LCP Update Coastal Act consistent, and thus in order to recommend approval with modifications. As you'll recall, we sent the City in-line edits to the complete LUP update draft that was ultimately approved by the City Council in 2019, and these in-line edits serve as the basis for our suggested modifications. We have gone through those previously suggested in-line edits and have refined those to the minimum amount necessary that we think is essential for Coastal Act conformance. While this has limited the quantity of the previously provided in-line edits, there remain multiple suggested modifications throughout the document.

Generally, in terms of natural hazards and coastal resilience, the modifications would change a number of definitions in the glossary to ensure that the proposed hazards policies will: adequately apply to development that will likely be subject to coastal hazards over its anticipated life; provide sufficient analyses to demonstrate avoidance, minimization, and mitigation of such hazards and associated impacts; and ensure allowances for shoreline protection are limited to that which is allowable under the Coastal Act. Modifications are made to the proposed policies in the associated hazards-related chapters for consistency with the suggested changes to the glossary. In addition to modifications to the hazards-related chapters, we will also be suggesting modifications to the land use and public access chapters to ensure that all site constraints are considered for any proposed development and that public services are evaluated and planned for accordingly given environmental hazards. Additionally, we will be suggesting modifications to the environmental and scenic resources chapter to expand on ESHA protections as required for Coastal Act consistency.

These are all topics that we've discussed with you for the last five or so years, so the suggested modifications shouldn't be a surprise, and while we know that we have been unable to come to agreement on these points, we would like to bring this forward to the Commission. All that said, if you have follow-up questions on any of this, please let us know. Thanks!

Best,
Julia

Julia Koppman Norton
North Central Coast Coastal Resilience Specialist
California Coastal Commission



CAUTION: This email originated from outside of the City of Pacifica. Unless you recognize the sender's email address and know the content is safe, do not click links, open attachments or reply.

PACIFICA LAND TRUST



PRESERVING AND PROTECTING THE OPEN SPACES OF PACIFICA

Date: January 1, 2020

To: Pacifica City Council , City Staff and California Coastal Commission

From: Kathy Kellerman, Pacifica Land Trust President

Subject: LCP Public Access and Recreation-Trail System wildlife safety planning concerns

Dear Pacifica City Council, City Staff and California Coastal Commission,

Reviewing the proposed LCP for the City of Pacifica, we have noted that there is a lack of planning for wildlife safety and connectivity in *Public Access and Recreation-Roadway Network and Planned Improvements* (chapter 3, section 3.4). While half of Pacifica is open space, it is fragmented and hazardous for wildlife moving between the coast and inland hills, particularly across Highway 1. This issue is most concerning for the future pedestrian crossings (e.g. PR-I-35, PR-I-36, p. 3-24) which could be designed to accommodate wildlife movement, thereby safeguarding both animals and motorists.

We encourage the City of Pacifica and the California Coastal Commission to develop a plan to enhance wildlife corridors based on the best available science (see "Recommendations to reduce wildlife-vehicle collisions" <https://openspacetrust.org/downloads/MontereyRoadReport.pdf> for a local example). By including wildlife in the LCP plan we can select the number and location of under- and over-passes to reduce wildlife deaths along Highway 1 and preserve the natural character of Pacifica's environment.

Sincerely,

A handwritten signature in blue ink that reads "Kathy Kellerman". The signature is fluid and cursive, with a long horizontal stroke at the end.

Kathy Kellerman

President, Pacifica Land Trust



PEDRO POINT COMMUNITY ASSOCIATION

Board of Directors 2019

November 3, 2019

OFFICERS

Marcia Settel
President

Joanne Gold
Vice President

Breck Hitz
Treasurer

Danny Estrella
Secretary

Camille Keating
Firehouse Manager

MEMBERS

Helen Brönte Stewart

Sam Casillas

Bruce Ferry

Allison West

California Coastal Commission
North Central Coast District Office
45 Freemont Street
San Francisco, CA 94105

Dear Commissioners,

We are contacting you on behalf of the Pedro Point Community Association (PPCA) regarding the Local Coastal Land Use Plan Draft recently submitted by the City of Pacifica.

As a non-profit community association, the PPCA serves to provide a voice for its residents, businesses, and property owners in the shaping of Pedro Point as integral part of the broader Pacifica community.

After gathering extensive community feedback, we are writing to state that the PPCA is strongly opposed to the City of Pacifica's recommendation to designate the land use of the Pedro Point Caslon field on San Pedro Ave. as Commercial-Recreational-Mixed Use (CRMU).

Instead, the PPCA urges the Coastal Commission to designate the Calson Field as either Low Intensity Visitor-Serving Commercial (LIVC) or Conservation (C), based on Sea Level Rise and tsunami evacuation zone data previously presented by the PPCA in meetings with the Coastal Commission on 9/18/19.

On a related note, we also urge the Coastal Commission to disallow any further development of hotels/motels in the Pedro Point neighborhood and require adherence to current height limits of 35 feet for all projects, in order to preserve visual impacts along the coast.

We deeply appreciate the Coastal Commission's steadfast commitment to protect, conserve, restore, and enhance the environment of the California coastline, and thank you for your attention to this sensitive coastal parcel adjacent to the beautiful Pacifica coastline.

Sincerely,

Marcia Settel
PPCA President

Joanne Gold
PPCA Vice President

SAN FRANCISCO
PUBLIC GOLF ALLIANCE



1370 Masonic Ave., San Francisco, CA 94117 • 415-290-5718 • info@sfpublicgolf.org

September 25, 2019

Pacifica City Council
170 Santa Maria Ave.
Pacifica, CA. 94044

Re: Local Coastal Plan Update, Policies Relating to Sea Level Rise Adaptation
Pacifica City Council Meeting, Monday, Sept. 30, 6:00 p.m.

Executive Summary:

- 1. Coastal Resilience Policy CR-1-3 needs to state expressly, in the language of the Policy itself – not just in Staff’s comment – that the Adaptation Plan and all of its component parts, is strictly a preliminary resource document and is not Policy or in any way “implemented” as Policy.**
- 2. Coastal Resilience Policy CR-1-546 needs more work, to make certain that it does not frustrate Pacifica’s expressed intention to improve its shoreline structures, including in the Sharp Park sub-area.**

Dear Council Members,

This is a follow-up our prior letters to you in this matter dated September 3, 2019, August 26, 2019¹, and December 7, 2018², which are all in the public record, have previously been furnished to you and to the Planning Department, and which are linked to and incorporated into this letter by reference at footnotes 1, and 2, below..

Coastal Resiliency Policy CR-1-3 Remains Must be Revised to make clear that The Adaptation Plan and its components, including the Cost-Benefit Analysis, Are not Policy or “implemented” as Policy.

As it appears in the Sept. 16, 2019 “Consultation Draft” LCP (Appendix 1a to Council’s Sept. 30 Agenda Packet, beginning at Packet Page 13) , Coastal Resiliency Policy CR-1-3, “Sea-Level

¹ Found at Pacifica City Council Meeting Agenda Packet, Sept 3, 2019, at Packet Page 603 ff
<https://pacificacityca.iqm2.com/Citizens/FileOpen.aspx?Type=1&ID=1264&Inline=True>

² Found at Pacifica City Council Meeting Agenda Packet, Sept 3, 2019, at Packet Page 606 ff
<https://pacificacityca.iqm2.com/Citizens/FileOpen.aspx?Type=1&ID=1264&Inline=True>

Rise Adaptation Plan,” states: “The City **shall implement** its Sea-Level Rise Adaptation Plan as expressed in the general and sub-area Coastal Resilience policies.” The Consultation Draft, by footnote 2 and a url link to the September 2018 Adaptation Plan, effectively incorporates the Adaptation Plan into Policy CR-1-3. This contradicts what is said elsewhere in the Consultation Draft, at page 6-9 (Packet Page 11), that “The purpose of the Adaptation Plan is to be a **background** document that analyzes various adaptation strategies. . . to inform future decisions on adaptation policies.” The Planning department’s Summary Report to Council (Appendix 1 to Council’s Sept. 30 Agenda Packet (<https://pacificacityca.igq2.com/Citizens/FileOpen.aspx?Type=1&ID=1268&Inline=True>) , at page 5 (Packet Page 7) also calls the Adaptation Plan “a background document”. Specifically with regard to the Adaptation Plan’s Cost-Benefit sections (Sections 5.3-5.4), the Planning Department’s Sept. 30 Summary Report states:

“ . . . components of the Adaptation Plan, such as the cost-benefit analysis and assessment of the managed retreat adaptation strategy, are not a part of the proposed Coastal Resilience policies contained in Chapter 6 “Coastal Resilience” of the LCP Consultation Draft. The City will not rely on these Adaptation Plan background analyses for future project review, LCP amendment, public infrastructure investment, or other purposes unless and until they are updated with the latest information when needed in the evaluation of a future decision.” (Summary Report, pg.6, found at Appendix 1, Agenda Packet page 8.)

If so, then the language of the Policy itself – CR-1-3 – needs to state on its face that the Adaptation Plan is not policy and is not to be construed or “implemented” as policy for any purposes. The “shall be implemented” and other “implementation” language needs to be removed from CR-1-3. We suggest the following revised language to CR-1-3 to make the point clear in the policy language.

CR-1-3 Sea-Level Rise Adaptation Plan. The September 2018 Sea-Level Rise Adaptation Plan, including its Cost-Benefit Analysis and all other components and subparts, is a preliminary background document that was not intended to and does not in fact constitute or establish City Policy, and is not to be used in the future in LCP amendment, public infrastructure investment, mitigation calculation or other future purposes.

The Cost-Benefit Analysis is Bogus and should be specifically disclaimed.

The Adaptation Plan’s Cost-Benefit Analysis sections (Section 5.3-5.4) end with the conclusion that Managed Retreat is the most cost-efficient strategy in most Pacifica coastal neighborhoods, because the value of the coastal resources to be protected is less than the cost of maintaining the shoreline structured. This cannot be in any way be adopted as the “policy” of the City of Pacifica. The bogus Cost-Benefit Analysis does not support such a “policy,” because that Cost-Benefit Analysis does not fully account for or analyze or value Pacifica’s coastal resources. At its September 3 Council Meeting, Council asked staff to prepare a list of the coastal resources that were not analyzed or economically valued in the Adaptation Plan’s Cost-Benefit Analysis, as required by the City’s 2017 Grant from the Coastal Commission. The requirements of that Coastal Commission Grant are analyzed in detail in our Dec. 7, 2018 Letter to the City Council.

Coastal Commission Grant to Pacifica, No. LCP-16-01, dated May 10, 2017, requires an evaluation of “how sea level rise and erosion will impact the city’s social, economic, and physical coastal resources, including homes, businesses and critical facilities and infrastructure.. . . [and] will include an in-depth assessment of the costs and benefits of implementing each strategy, including costs and benefits related to recreational and ecological values of beaches and other coastal

resources . . .” As discussed in detail at pages 5-12 of our Dec. 7, 2018 letter³, at Sharp Park (and we suspect in Pacifica’s other coastal sub-areas), the Cost-Benefit Analysis excluded economic valuations for trail and coastal golf recreation, the economic value of business, of low- and moderately-priced housing, all of which are “coastal resources” mentioned in the Coastal Commission Grant and/or as defined under the Coastal Act. Nor did it evaluate relocation costs for housing, infrastructure, business, or otherwise affected by coastal flooding.

The Consultation Draft, at pages 6-9 and 6-10 and at Table 6-2, admits that the Cost-Benefit Analysis does not include economic values for coastal trail recreation and golf recreation. Through 2050, we calculate the potentially lost public coastal golf recreation value at about \$32 Million – about 75 percent of the value assigned by the Cost-Benefit Analysis to coastal beach recreation.⁴ The Consultation Draft states (at page 6-10), that only the public land at the golf course was valued in the Cost-Benefit Analysis. But it was far undervalued. The golf course property – owned by San Francisco – includes not only the fairways and greens, but also the Clubhouse, parking lot, maintenance facility, wetlands with endangered species, and the flood-control pumps that protect the West Fairway Park neighborhood, located at the southwest corner of the golf course near the levee. The real property and natural habitat values are not reflected in the Cost-Benefit Analysis. These omissions have been the repeated subject of critical written comments not only from the undersigned, but also from the City and County of San Francisco. Again at Sharp Park, no value is placed by the Cost-Benefit Analysis on the golf and clubhouse businesses, which according to a letter from Manager Mark Duane, has 50 part- and full-time employees, many of which are long-term and Pacifica residents.⁵ Neither does the Cost-Benefit Analysis place any value on any of the other businesses in the Sharp Park sub-area.

On the issue of the Cost-Benefit Analysis’s over-valuation of beach recreation, Table 6-2 of the Consultation Draft (at page 10) shows that, except for Linda-Mar Beach, there is no genuine data showing beach use – actual numbers of people using the beaches – for Sharp Park or any of Pacifica’s “Other Beaches”. According to Table 6-2, the only “Source” for “use” information for these “Other Beaches” is “Pacifica CRSMP”. This is a reference to the 2016 Draft Coastal Regional Sediment Management Plan, which has never been finalized or approved, and which the Adaptation Plan itself states – in its incorporated June 2018 Sea Level Rise Vulnerability Assessment – “are not being directly relied upon for the City’s [Sea Level Rise] study.” Detailed analysis of this point – and of the City’s statement that it will not rely on data from the draft CRSMP – is found at our December 7, 2017 letter to the City Council, at pages 14-16, footnotes 65-72, and Exhibit H thereto, being a copy of the Planning Department’s written Master Response to questions about use of the draft CRSMP in the City’s Sea-Level Rise Study.”⁶

So the bottom-line on the beach recreation valuation issue is that the Cost-Benefit Analysis lacks information on beach use at Sharp Park and Pacifica’s “Other Beaches” (other than Linda Mar),

³ Found at Pacifica City Council Meeting Agenda Packet, Sept 3, 2019, at Packet Pages 610-617
<https://pacificacityca.igm2.com/Citizens/FileOpen.aspx?Type=1&ID=1264&Inline=True>

⁴ Found at Pacifica City Council Meeting Agenda Packet, Sept 3, 2019, at Packet Page 610
<https://pacificacityca.igm2.com/Citizens/FileOpen.aspx?Type=1&ID=1264&Inline=True>

⁵ Found at Pacifica City Council Meeting Agenda Packet, Sept 3, 2019, at Packet Page 613-614
<https://pacificacityca.igm2.com/Citizens/FileOpen.aspx?Type=1&ID=1264&Inline=True>

⁶ Found at Pacifica City Council Meeting Agenda Packet, Sept 3, 2019, at Packet Page 619-620
<https://pacificacityca.igm2.com/Citizens/FileOpen.aspx?Type=1&ID=1264&Inline=True>

so a valuation of “beach recreation value” at those Other Beaches is impossible – whatever the “day-at-the-beach” figure is used, whether \$1 or \$10 or \$40. No total value is calculable because there is no valid multiplier (number of users) for the multiplicand (day-use-value). So it is improper to include any “beach recreation value” in the Cost-Benefit analysis.

The Planning Department’s “Adaptation Plan” narrative explanation, found at pages 6-9 to 6-11 of the Consultation Draft (Appendix 1a to the Council’s September 30 Agenda Packet), accordingly needs to be revised.

CR-1-24 and -25: benefit of coastal protection is more than for infrastructure;
Also, **CR-1-546 is inconsistent with CR-1-24, -25**

Shoreline armoring structures protect the entire Sharp Park – West Fairway Park neighborhood from the Sea. Coastal Resilience Policy CR-1-24 states the City’s policy to maintain and expand its shoreline protection: “Maintain existing or construct new shoreline protection structures to protect public infrastructure. Extend the Beach Boulevard seawall to the Sharp Park Golf Course berm.” But “public infrastructure” is not the only thing that needs to be protected in this area: residences, both owner-occupied and rented, low-income housing, businesses, wetlands, and other coastal resources including public recreation should also be mentioned as resources to be protected by the shoreline structures. CR1-24 should accordingly be broadened.

There is also an inconsistency problem with CR-1-546. What is commonly called the Beach Boulevard Seawall is actually two “shoreline structures”—the retaining wall north of the Pier, and the true sea wall to the south. There is now no coastal protection structure at the end of Clarendon, leaving an approximately 75-to-100-foot gap between the Sharp Park Golf Course levee and the south end of the Beach Boulevard seawall. A gap-filler in this area may well be considered a “new structure” under draft CR-1-546 as written. The Council must clarify the language of CR-1-24, -25 and CR-1-546 to spell-out how this will be handled. Current language of these two draft policies is very unclear on this point, and in its current state that unclear language has high potential for mistake, confusion, disagreement, potential litigation and delay, in the event of any attempt by the City to adequately protect the Sharp Park – West Fairway Park -Mori Point subarea.:

Respectfully submitted,
San Francisco Public Golf Alliance

Richard Harris

Richard Harris, President

ccs:

Pacifica City Council and Councilmembers
Pacifica Planning Commission and Commissioners
Pacifica Planning Department, Tina Wehrmeister, Director
Pacifica City Manager Kevin Woodhouse
Pacifica City Clerk Sarah Coffey
Pacifica Public Works Department
Bonny O’Connor, Assistant Pacifica Planner
Spencer Potter and Lisa Wayne, SF Recreation and Park Department

cc's, cont:

Congresswoman Jackie Speier

State Senator Jerry Hill

Assemblyman Kevin Mullin

San Mateo County Board of Supervisors

California Coastal Commission, North-Central Coast District

ESA, Inc., Attn. James Jackson, Bob Battalio

Philip King

San Mateo County Office of Sustainability

U.S. Army Corps of Engineers, Susan M. Ming, PE

Bo Links, Esq.

SAN FRANCISCO
PUBLIC GOLF ALLIANCE



1370 Masonic Ave., San Francisco, CA 94117 • 415-290-5718 • info@sfpublicgolf.org

September 3, 2019

Pacifica City Council
170 Santa Maria Ave.
Pacifica, CA. 94044

Pacifica Planning Commission
170 Santa Maria Ave.
Pacifica, CA. 94044

Re: Local Coastal Plan Update, Policies Relating to Sea Level Rise Adaptation
Joint Pacifica City Council / Planning Commission Study Session
Tuesday, September 3, 5:30 p.m.

- (1) Public Golf Alliance requests clarifying language in the Local Coastal Plan Policies Relating to Sea Level Rise Adaptation to make clear that City of Pacifica is not “implementing” or adopting or approving the defective and incomplete Cost-Benefit Analysis – Sections 5.3 and 5.4 -- of the Sea Level Rise Adaptation Plan.
- (2) The draft LCP Policies under review are not “Final Policies” (as they have been mislabeled); rather, City Council agreed on the record at its Dec. 10, 2018 meeting that they are “draft” policies, subject to reconsideration and revision by the current City Council.

Dear Council Members and Planning Commissioners,

This is a follow-up to our letter to you in this matter dated August 26, 2019.

1. We request insertion of a disclaimer of the defective Cost-Benefit Analysis

As detailed in our letters of August 26, 2019 and December 7, 2018 letter to the City Council (attached as Exhibit 1 to the August 26 letter), the Cost-Benefit Analysis (subsections 5.3 and 5.4) of the Pacifica Sea Level Rise Adaptation Plan (September, 2018) ([Final Draft Adaptation Plan with Response to Comments \(9/21/2018\)](#)), overvalues beach recreation while simultaneously undervaluing and/or ignoring backbeach coastal resources within Pacifica’s coastal zone -- affordable housing, wetlands and their resident endangered species, businesses, public coastal recreation including trail-walking and golfing, and real property including the Sharp Park Golf Course. The Sea Level Rise Adaptation Plan then concludes that Managed Retreat is the most cost-beneficial response to threatened sea level rise in most Pacifica coastal neighborhoods including Sharp Park-West Fairway Park - Mori Point “... because the engineering costs associated with armoring . . . significantly exceed

the benefits (in terms of lowering property vulnerability)” (at Page 82), “ ... because the cost of . . . armoring, were higher than the benefits of protecting the property.” (At Page 96.)

The draft Local Coastal Plan Sea Level Rise Adaptation Policies ([Final Draft LCP Policies - As Authorized by City Council on 12/10/2018](#)), now before the Council and Planning Commission for reconsideration, include at least two Hazard Policies which purport to “implement” the Adaptation Plan (Sept., 2018), as follows.

Hazard Policy 4 Sea Level Rise Adaptation Plan. (found at Page 7):

*“The City **shall implement** its Sea-level Rise Adaptation Plan (Appendix A) as expressed in the LCP’s general and sub-area coastal hazard adaptation policies.”*

*.....
Development in coastal hazard zones may be approved consistent with the subarea policies (16– 43) if the following findings can be made:*

*a. The proposed development is sited and designed to minimize coastal hazards and impacts to coastal resources to the extent feasible,
consistent with the Adaptation Plan (emphases added)*

Hazard Policy 15 (LHMP Alignment). (found at Page 9):

*..... Leverage FEMA funding opportunities for hazard mitigation and other related funding mechanisms to **implement the Sea-Level Rise Adaptation Plan** as expressed in the LCP’s general and sub-area coastal hazard adaptation policies.*

We are concerned that unless the Cost-Benefit Analysis (with its conclusion that Managed Retreat is more cost-effective than sea walls, levees, and other shoreline protection) is expressly disavowed, that it will be available to future decision-makers as a “backdoor” to impose Managed Retreat (by increasing mitigation costs or otherwise impairing funding sources – notwithstanding the stated preference elsewhere in the Policies for shoreline protection for Pacifica’s neighborhoods. So we ask that the following language be inserted in the final version of the Local Coastal Plan Policies Relating to Sea Level Rise Adaptation:

The ‘Cost-Benefit Analysis’ section of the Sea Level Rise Adaptation Plan is not adopted or approved by the City of Pacifica, and is not incorporated into the Local Coastal Plan Policies Related to Sea-Level Rise Adaptation, or any of its policies including but not limited to Hazard Policies 4 and 15 for any purpose, and is not to be used for any future purpose by the City of Pacifica or its planning processes, including its Local Coastal Plan, or by any of its Departments, including but not limited to the Planning Department.

2. The current version of the “Local Coastal Plan Policies Relating to Sea-Level Rise Adaptation” was not intended – and was not approved or adopted by the City Council at its December 10, 2018 meeting – as a “Final Draft”. Rather, the Council expressly stated in open meeting that it was a revised draft – not intended to be “final,” and subject to future reconsideration and revision by the newly-elected City Council.

“Final Draft” is a mistaken and misleading name for the version of the “Local Coastal Plan Policies for Sea-Level Rise Adaptation” currently posted on the Planning Department’s Sea Level Rise webpage and before the Council and Commission for reconsideration.([Final Draft LCP Policies - As Authorized by City Council on 12/10/2018](http://pacificacityca.igmp2.com/Citizens/FileOpen.aspx?Type=12&ID=1206&Inline=True)). Rather, it should properly be called “Revised Draft”.

The Minutes of the City Council's December 10, 2018 meeting (quoted from below) (<http://pacificacityca.igmp2.com/Citizens/FileOpen.aspx?Type=12&ID=1206&Inline=True>)report extensive discussion and agreement among the Council members that they were not adopting or approving a “final” draft or a “final” document of any kind, but rather were approving draft policies for inclusion in a revised draft document that in turn would be subject to consideration – and reconsideration in 2019 by the incoming City Council. (See discussion between then-Councilwoman Sue Digre, Planning Director Tina Wehrmeister, and then-Mayor John Keener at December 10, 2018 City Council Minutes Packet, pages 22-24, Councilwoman Martin at page 31 and Motion at page 35, and the language of the Recommended Action, at Minutes, Page 9. Following are direct quotations from Minutes:

Councilmember Digre stated that, for the purpose at this time, they can take the words final draft and change it and take away the word final and say this is a draft document and asked if she was correct in that assumption. (Pg. 23)

Planning Director Wehrmeister agreed, adding that she thought the motion as written does not include final. (Pg. 23)

Mayor Keener stated that it does not. (Pg. 23)

Councilmember Digre. . . . She stated that they took the word final out and this is a draft moving forward. (Pg. 24)

Councilmember Martin thought that should make people feel better. She wants them to know that and play out good scenarios for 2019 as commented by Councilmember Digre this was a draft. (Pg. 31)

City Attorney Kenyon stated that the new Council will have an opportunity to review all the policies again, as this is not the final adoption of the LCP. She stated that staff is just asking direction as to whether Council wants staff to move forward with these policies as crafted today but policies may change in 2019 because staff has additional revisions or because the new Council has their own revisions to make. She was just clarifying that this is not a final document. (Pg. 31)

Councilmember Martin understood, but thought approving tonight was wonderful to be able to start socializing with legislators. She feels better that they will still be able to make revisions. (Pg. 31)

Councilmember Martin moved to 1) give direction to move forward with incorporating the attached sea level rise adaptation policies into a revised Draft Local Coastal Plan. **City Attorney Kenyon** added including the revisions as reflected in the staff report. **Councilmember Martin** added including the revisions as reflected in the staff report. (Pg. 35)

Agenda Item 8 “Recommended Action” (which was the basis of Councilwoman Martin’s Motion) says nothing about a “final” policy or policies. Rather, the “Proposed Action” is to “Give direction to move forward with incorporating the attached sea level rise adaptation policies into a revised Draft Local Coastal Plan.” (Minutes Package, Page 9)

Respectfully submitted,
San Francisco Public Golf Alliance

Richard Harris

Richard Harris, President

CCS:

Pacifica City Council and Councilmembers
Pacifica Planning Commission and Commissioners
Pacifica Planning Department, Tina Wehrmeister, Director
Pacifica City Manager Kevin Woodhouse
Pacifica City Clerk Sarah Coffey
Pacifica Public Works Department
Bonny O’Connor, Assistant Pacifica Planner
Spencer Potter and Lisa Wayne, SF Recreation and Park Department
Congresswoman Jackie Speier
State Senator Jerry Hill
Assemblyman Kevin Mullin
San Mateo County Board of Supervisors
California Coastal Commission, North-Central Coast District
ESA, Inc., Attn. James Jackson, Bob Battalio
Philip King
San Mateo County Office of Sustainability
U.S. Army Corps of Engineers, Susan M. Ming, PE
Bo Links, Esq.

Ringuette, Oceane@Coastal

From: deni asnis <dasnis2001@yahoo.com>
Sent: Friday, January 3, 2020 2:03 PM
To: Wehrmeister, Tina@City of Pacifica; Rexing, Stephanie@Coastal; KoppmanNorton, Julia@Coastal
Subject: Pacifica Local Coastal Plan

Pacifica needs to have a plan in place for when SLR hits defined events and increasing heights. Everything will change over the next several years and so must our response since our LCP is not a workable plan. An example is the city's scattered response to the collapsed housing on the cliffs at Esplanade over the past 20 years. It would have been much cheaper and cleaner for the city to have had plans in place rather than to be forced to respond to emergencies and take a year or two to create new plans when, by this time, it was already too late.

Pacifica needs an LCP that considers long range as well as short range solutions. To have an LCP in which sections are written by special interest groups, i.e., the real estate industry and its sibling, the developers, ignores the needs of the majority of Pacifica's citizens.

I support the positions stated in the CCC comment letter.

Thank you for your urgent attention to this matter.
Deni Asnis
Rockaway Beach Avenue, Pacifica, CA

Ringuette, Oceane@Coastal

From: Hal Bohner <hbohner100@gmail.com>
Sent: Thursday, January 2, 2020 11:15 AM
To: KoppmanNorton, Julia@Coastal
Cc: Tina Wehrmeister; Rexing, Stephanie@Coastal
Subject: Pacifica's proposed draft update to the Local Coastal Program (LCP) Land Use Plan (LUP)

Dear Ms. Koppman Norton,

I am writing in support of the position of the staff of the Commission concerning the City of Pacifica's proposed draft update to the Local Coastal Program (LCP) Land Use Plan (LUP) as expressed in your letter dated November 22, 2019, to Ms. Tina Wehrmeister.

I have been following the debates in Pacifica over coastal land use planning which have gone on for many years and have intensified with the impending disaster of Sea Level Rise. I support a robust program of long-range planning for sea level rise that considers multiple options, protects local beaches, and reduces long run financial risks to the city and homeowners. As part of Pacifica's long-range planning, managed retreat must be an option included in and supported by the LCP, and coastal armoring must be discouraged.

I recognize that these issues are being faced today in many other jurisdictions along the California Coast and thank the Commission and staff for their continued support for and encouragement of sound long-range planning by the local jurisdictions. I realize that many local jurisdictions are unwilling and in some cases unable to undertake the necessary planning and implementation of those plans and look forward to the Commission providing the necessary encouragement and technical support. I am also hopeful that the California legislature will provide the necessary financial support.

Sincerely,

Hal Bohner

Ringuette, Oceane@Coastal

From: Lawrence Bothen <lbothen@sbcglobal.net>
Sent: Friday, January 3, 2020 4:02 PM
To: KoppmanNorton, Julia@Coastal; Rexing, Stephanie@Coastal
Cc: Wehrmeister, Tina@City of Pacifica
Subject: Pacifica LCP

Dear CCC members,

I am writing to oppose the CCC's demands that Pacifica's Local Coastal Plan must include a Managed Retreat component. You surely realize that any language to that effect runs counter to Pacifica's stated intent to protect the citizens, property and business owners of Pacifica from sea level rise.

Adopting such language, and naming all land west of Coast Highway a Hazard Zone, is an immediate red flag to banks and insurers. Property owners would have to disclose this status to prospective buyers, lenders or insurers. Property values would plummet. Additional permits from the CCC would be required for even essential maintenance, repairs or improvements. Property owners might also be required to purchase unnecessary and expensive flood insurance. Insurance companies would likely raise rates for conventional insurance in these zones as well.

And for what? To protect beaches and public access to them? All on a bet that in 100 years the sea level might be 5 to 6 feet higher? The beaches in Pacifica are already accessible, well used and protected. But people have to be protected too. It will be far less costly to keep in place the coastal protections we have and improve them where needed than to condemn 1/3 of the City and remove those protections. The cost of relocating infrastructure alone would be staggering. The cost of paying off all the property owners who would rightfully sue you into oblivion for your heavy handedness is a cost that would have to be borne by the entire state of California. Multiply that by the 60 plus coastal communities up and down the state and you have staked out a position with Managed Retreat that is not just unrealistic. It is unreasonable, untenable, and completely unacceptable.

The CCC has demonstrated repeatedly that it views itself as an imperial authority that cannot be questioned or defied. It has become, in effect, a rogue agency that acts with impunity and answers to no one. You are not elected officials. You are public servants. But, as with any public servant, you must answer to the citizens you claim to serve. When your stated intent is to revoke the rights of property and business owners and take away our voice, then you no longer serve the public and should be removed.

I will be writing my state senator and assemblyman about the outrageous demands by the CCC. Your arrogance must be met with accountability.

Sincerely,

Larry Bothen
105 Troglia Terrace
Pacifica, CA 94044

Ringuette, Oceane@Coastal

From: amy <amyvegan@gmail.com>
Sent: Thursday, January 2, 2020 8:35 AM
To: Wehrmeister, Tina@City of Pacifica; KoppmanNorton, Julia@Coastal; Rexing, Stephanie@Coastal; Dierdre Martin Pacifica City Council; Sue Beckmeyer Pacifica City Council; Sue Vaterlaus Pacifica City Council; Mike O'Neill Pacifica City Council; Mary Bier Pacifica City Council; pacifica climate committee, all members
Subject: Managed Retreat, Pacifica

Jan. 2, 2020

Dear California Coastal Commission,

I am a Pacifica homeowner writing in support of the commission's decision that managed retreat must be included in Pacifica's Local Coastal Plan. Here is the reality of the science: Greenland, the Arctic and Antarctica are melting NOW much faster than expected. Pacifica and all coastal towns need to accept this grim reality. We need short term and long range planning for sea level rise that mandate multiple solutions, including managed retreat, to protect the coastline that minimize or prevent long run financial devastation to homeowners, businesses, the city of Pacifica and all coastal towns in San Mateo County.

Sincerely,
Amy Lynn Caplan
494 Manor Dr.
Pacifica, CA 94044

Ringuette, Oceane@Coastal

From: Samuel Casillas <samuelcasillas@hotmail.com>
Sent: Tuesday, August 27, 2019 8:20 AM
To: murdockc@ci.pacifica.ca.us
Cc: Rexing, Stephanie@Coastal; martind@ci.pacifica.ca.us; Mary Bier; joannegold@yahoo.com; o'connorb@ci.pacifica.ca.us; KoppmanNorton, Julia@Coastal; campbellr@ci.pacifica.ca.us
Subject: Re: Pedro Point field - 8/26 Study Session meeting
Attachments: Pedro Point Field U.S. Coast Survey topo w labels 1869.pdf; Pedro Pt Field 2006 wetland ditching and drainage + CRLF.pdf

Follow Up Flag: Follow up
Flag Status: Completed

Hi Christian,

I wanted to follow up on the Study Session conducted last night and how it devolved pretty much into a discussion of the Pedro Point Field (a.k.a: the Calson Field).

First, I apologize for not being there in person as I am on a business trip, but I was kept informed throughout the meeting of what was occurring. I am also only representing myself, but I believe my comments are aligned and representative of our community as represented by the overwhelming comments you received from citizens with the same viewpoint and from those who spoke last night.

Please understand it was not our intention to dominate this meeting, but recall that the community attempted to engage the city and the planning department in a dialogue through a neighborhood specific plan for Pedro Point that I believe could have clarified many of the errors in facts and judgement that continue to bog down the GPU process. And frankly I was surprised that Staff could not answer the question on CCC current land use designation, that a commissioner stated the job of city is to build in flood prone areas and the job of FEMA is to deal with the flooding and the mayor not knowing the difference between a perspective easement and adverse possession and everyone not taking into consideration current conditions based on science and data.

I realize the current city council turned down the PPCA's offer to work closely with the city to determine what is best for our neighborhood, but considering how the Pedro Point neighborhood has shown to be fully engaged and considerably more knowledgeable on issues in Pedro Point I would think it behooves the city to find a way to work with the neighborhood to find solutions that are best for the neighborhood and the city overall. Trying to correct errors in 2 minute increments of public comments is not the ideal way to resolve deficiencies in staff reports.

The PPCA and its citizens have conducted exhaustive research and believe we have a better understanding of the conditions of our neighborhood than anyone else as proven by the confusion on many questions/lack of answers brought up by commissioners, city council and staff.

If the city is not willing to entertain the formality of a neighborhood specific plan then we should find a different venue where we can have a productive dialog; otherwise we have no choice but to continue with the very inefficient process the city has currently chosen to resolve issues that will effect our neighborhood and our city for the foreseeable future.

Additionally, I have attached two more documents that details the illegal draining of the wetlands and the historical significance of the field being part of a much larger estuary.

Finally, I would like to thank you and your team for the continued professionalism you all have demonstrated; I realize this is not an easy task and are trying your best to resolve many issues.

Please let me know if you need any other information and/or if you would like to discuss how we can move forward.

Kind Regards,
Sam Casillas

From: Samuel Casillas <samuelcasillas@hotmail.com>

Sent: Monday, August 26, 2019 8:12 PM

To: murdockc@ci.pacifica.ca.us <murdockc@ci.pacifica.ca.us>

Cc: Stephanie.Rexing@coastal.ca.gov <Stephanie.Rexing@coastal.ca.gov>; martind@ci.pacifica.ca.us <martind@ci.pacifica.ca.us>; Mary Bier <marykbier@gmail.com>; joannegold@yahoo.com <joannegold@yahoo.com>; o'connorb@ci.pacifica.ca.us <o'connorb@ci.pacifica.ca.us>; KoppmanNorton, Julia@Coastal <julia.koppmannorton@coastal.ca.gov>

Subject: Pedro Point field - 8/26 Study Session meeting

Hi Christian,

Please see my attached GPU comments and accompanying documents that I would like included as part of tonight's study session.

Thanks and I hope things aren't getting too stressful for you!

Sam

From: Kathy <qdelrina2002@yahoo.com>
Sent: Saturday, October 19, 2019 7:14 PM
To: Carl, Dan@Coastal; Manna, Jeannine@Coastal; Ginsberg, Jo@Coastal; Rexing, Stephanie@Coastal; KoppmanNorton, Julia@Coastal
Cc: pedropointfield@googlegroups.com
Subject: Comments on the Local Coastal Land Use Plan Draft submitted by the City of Pacifica

Ladies and Gentleman

As a 25 year resident of Pacifica, specifically, Pedro Point, I am *urging* the Coastal Commission to designate the Calson Field as either Low Intensity Visitor-Serving Commercial (LIVC) or Conservation (C), based on all Sea Level Rise and tsunami evacuation zone data previously presented by the PPCA in meetings with the Coastal Commission on 9/18/19.

I ***strongly*** oppose the designation of Coastal Residential Mixed Use (CRMU) as proposed in the Local Coastal Land Use Plan Draft submitted by the City of Pacifica. This strip of land, streets, sewers, cannot support more houses and cars. Parking is already a nightmare with existing commercial uses.

I am also ***begging*** the Coastal Commission:

A. to disallow *any* further development of hotels/motels in the Pedro Point neighborhood; and

B. require adherence to current height limits of 35 feet for all projects, in order to preserve visual impacts along the coast.

Please.

Thank you for your time.

Kathy Castor
224 Stanley Ave
Pacifica, CA 94044

Ringuette, Oceane@Coastal

From: Bill [mailto:94116bc@gmail.com]
Sent: Wednesday, January 01, 2020 6:47 PM
To: Rexing, Stephanie@Coastal
Subject: Pacifica's LCP

January 1, 2020

Armoring our beaches is an unsightly, ineffective and short-sighted response to rising seas.

Pacifica should stop approving new buildings on the shore when the cost of protecting them from rising seas is borne by the taxpayers.

Bill Collins
Pacifica

Ringuette, Oceane@Coastal

From: Jack Coots <jawacoots@gmail.com>
Sent: Thursday, January 2, 2020 11:32 AM
To: KoppmanNorton, Julia@Coastal
Cc: REXING, Stephanie@Coastal
Subject: Pacifica local coastal plan

Dear Coastal Commission,

I am a Pacifica resident and I am writing to tell you I support the recent ruling that managed retreat needs to be included as an option in our local coastal plan.

Many of us Pacificans support long range planning that chooses not to ignore the reality of sea level rise but to include specific strategies for dealing with it to protect our beaches, community, and finances.

Thank you for your diligence,

Jack Coots
Pacifica, CA

Ringuette, Oceane@Coastal

From: Bill Crist <raconis79@comcast.net>
Sent: Friday, January 3, 2020 3:17 PM
To: Rexing, Stephanie@Coastal; KoppmanNorton, Julia@Coastal
Subject: Managed Retreat

Dear California Coastal Commission

I am a Pacifica resident and am writing in support of the commission's decision that managed retreat needs to be an option included in our local coast plan. I, like many Pacifica residents, support long range planning for sea level rise that considers multiple options, protects local beaches, and reduces long run financial risks to the city and homeowners.

Sincerely,
William F Crist

Sent from [Mail](#) for Windows 10

Dave Stewart
224 Stanley Avenue
Pacifica, CA 94044
(650)451-2149

October 21, 2019

California Coastal Commission
North Central Coast District Office
45 Fremont Street - Suite 2000
San Francisco, CA. 94105



Dear Commission Members:

I am a long term resident of Pacifica, Pedro Point, and I am urging the Coastal Commission to designate the Calson Field as either Low Intensity Visitor-Serving Commercial (LIVC) or Conservation (C), based on all Sea Level Rise and tsunami evacuation zone data previously presented by the PPCA in meetings with the Coastal Commission on 9/18/19.

I strongly oppose the designation of Coastal Residential Mixed Use (CRMU) as proposed in the Local Coastal Land Use Plan Draft submitted by the City of Pacifica. This strip of land, streets, sewers, cannot support more houses and cars. Parking is already a nightmare with existing commercial uses.

I am also urging the Coastal Commission to disallow any further development of hotels/motels in the Pedro Point neighborhood; and require adherence to current height limits of 35 feet for all projects in order to preserve visual impacts along the coast.

Thank you for your time.

Sincerely,

Dave Stewart

Ringuette, Oceane@Coastal

From: Carlos Davidson <carlosdavidson7@gmail.com>
Sent: Thursday, January 2, 2020 9:17 AM
To: Wehrmeister, Tina@City of Pacifica; KoppmanNorton, Julia@Coastal; Rexing, Stephanie@Coastal
Subject: Support CCC decision on Pacifica LCP

Dear California Coastal Commission

I am a Pacifica homeowner and am writing in support of the commission's decision that managed retreat needs to be an option included in our local coast plan. I, like many Pacifica residents, support long range planning for sea level rise that considers multiple options, protects local beaches, and reduces long run financial risks to the city and homeowners.

Sincerely,
Carlos Davidson

Ringuette, Oceane@Coastal

From: Danny Estrella <warnella@hotmail.com>
Sent: Monday, November 25, 2019 1:27 PM
To: Carl, Dan@Coastal; Manna, Jeannine@Coastal; Rexing, Stephanie@Coastal; KoppmanNorton, Julia@Coastal; Ginsberg, Jo@Coastal
Subject: Pacifica Local Coastal Land Use Plan, September 2019
Attachments: USGS map Pedro Pt.pdf; Peter Baye letter to Lee Diaz Pacifica.pdf; wetlandsMay3201410-41-41 GMT-0700.pdf; Ocampo letter to Calson.pdf; USGS Liquefaction Susceptibility map 2006.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

25 November 2019

California Coastal Commission (CCC)
North Central Coast District Office
45 Fremont Street, Suite 2000
San Francisco, CA 94105

Re: City of Pacifica Local Coastal Land Use Plan, September 2019 (LCP)

Dear Coastal Commission Representatives,

The above referenced land use plan has been submitted to the CCC for review and approval. I'm writing to express my concern about the land use designation for the land located along San Pedro Road in the south region of Pacifica. This particular property is referred to as the land of Ron Calson or the Calson property. This property is designated as Coastal Residential Mixed Use (CRMU) in the LCP, Figure 2-3. This designation "allows residential mixed use development in the Coastal Zone, housing over retail, or housing adjacent to retail (horizontal mixed use)" and "environmental resources must be evaluated and protected", page 2-8. Section LD-I-20 – Undeveloped San Pedro Avenue Site "allows housing of 3-5 units per gross acre (the property is 5.5 acres), a survey is required to delineate potential wetlands on the site, if any, as part of the development application and environmental review process".

I oppose this land use designation for several reasons: 1) the land is a wetlands that serves as a habitat for several species and therefore should be protected, 2) as the land is only a few feet above sea level the land is subject to flooding with sea level rise; development on this property would put people and property at risk, 3) the land is in the tsunami evacuation zone (LCP Figure 5-3, page 5-17 – Flood Zones).

Section 6.2, page 6-3 – Sea Level Rise Key Findings of the LCP discusses the threat to coastal land use due to sea level rise and summarizes this threat "impacts of sea level rise along Pacifica's coastline would be significant". As this land is just a few feet above sea level and within 50 yards of the shoreline it will be in the coastal flooding zone as sea level rises. Sea level rise combined with local storm runoff, flooding and liquefaction increase the risk to people and property in this area.

Figure 5-1- Liquefaction and Fault Lines, page 5-5 of the LCP, characterizes the Calson property as having medium potential for liquefaction. However, the USGS Liquefaction Susceptibility map, dated 2006 (attached), characterizes this property as having high to very high susceptibility to liquefaction. Liquefaction would put people and property at risk in the event of earthquake-induced liquefaction.

This land was included in the USF&W Service National Wetlands Inventory October 16, 2011, and the USGS National Page map, which I've attached for your reference. I want to inform you that the land was ditched and drained by the City of Pacifica on November 30, 2007 as a service for Ron Calson, the property owner. I've attached a copy of a letter, dated January 10, 2008, from Van Ocampo, P.E., the Deputy Director of Public Works and City Engineer for the City of

Pacifica confirming that this work was done. I understand that this kind of work in the Coastal Zone requires approval from the California Coastal Commission. Is this correct? The City of Pacifica cannot produce a permit from the CCC for this work. This work may have been done without permit. Also, in section 1.5, page 9 - 'Wetland context and cumulative impacts: environmental setting of Pedro Point' of Peter Baye's letter to Lee Diaz, Associate Planner, City of Pacifica, dated July 7, 2014 (attached here), Dr. Baye describes the wetlands character of the Calson property and documents witnessing draining of the land. The land has since been taken out of the USF&W Service National Wetlands Inventory. The illegal ditching may have resulted in the change of designation by the USF&WS.

I urge the CCC to take appropriate action to reinstate this property back to its original condition.

There is another section of coastal land that is of concern: the Rockaway Headlands. Figure 2-3, page 2-10 – Land Use Diagram of the LCP specifies the hill between Linda Mar Beach and Rockaway Beach as Low Intensity Visitor Serving Commercial (LIVC). Page 2-11 in the LCP defines LIVC as “allows campgrounds, rustic lodging, concession stands, warming huts, outdoor events sites and similar uses. Further, in ER-I-55, page 4-38, of the LCP is specifies that “a view restaurant may be appropriate if access can be created without harming biological or scenic resources” on the Rockaway Headlands. This land is a habitat for ferruginous hawks as well as other species, and has been used as a view shed and recreation area since people first inhabited the coast. Section LD-I-18, page 2-30, of the LCP states, “Any use on this site must recognize the limited opportunity for vehicular access”. The land is currently accessed by traditional hiking trails and the Pacifica Recreation trail. This statement is true in that any significant access that would accommodate vehicular traffic would require damage to the site and the ecosystem, the recreation trail or would introduce a significant traffic hazard for ingress and egress of this area from Highway 1, which runs alongside this land.

I oppose any development on the Rockaway Headlands.

I appreciate your consideration of my concerns about the Pacifica Local Coastal Plan.

Kind regards,

Danny Estrella
114 Kent Road
Pacifica, CA

Ringuette, Oceane@Coastal

From: R Francis <phasmid007@gmail.com>
Sent: Friday, January 3, 2020 8:31 AM
To: KoppmanNorton, Julia@Coastal; Rexing, Stephanie@Coastal; Wehrmeister, Tina@City of Pacifica
Subject: Pacifica Local Coastal Plan

Dear California Coastal Commission

As a Pacifica resident, I wish to state my support for the commission's recent decision that our local coastal plan should include "managed retreat" as an option in long-range planning around sea level rise. Like many Pacifica residents, I support a plan that includes all sensible options that protect property and beaches to the extent possible, and reduce long-range financial risks to the city and home-owners. But I also believe we need to be realistic about the limited ability of engineering solutions and other band-aids for fighting future coastal loss. Thank you for your leadership on the planning effort.

Sincerely,

G. Ross Francis
424 Buel Ave, Pacifica CA

Ringuette, Oceane@Coastal

From: wendy wynn garber [mailto:w.garber@sbcglobal.net]
Sent: Thursday, January 02, 2020 9:27 AM
To: Rexing, Stephanie@Coastal
Cc: Wehrmeister, Tina@City of Pacifica
Subject: Managed Retreat

I totally support the Commission's decision to include managed retreat as part of our local coastal plan. I have been a Pacifica resident for the past 24 years, and have witnessed first hand the destructive effects of rising sea levels. With global warming and melting glaciers, continued sea level rise is inevitable and needs to be managed to protect our beaches and homes that are situated near the coast. Long-range planning which includes managed retreat is necessary to protect and preserve our beautiful coastal landscape.

Sincerely,

Wynn Garber

Ringuette, Oceane@Coastal

From: D Gold <dgold184@gmail.com>
Sent: Wednesday, January 1, 2020 5:09 PM
To: Rexing, Stephanie@Coastal; KoppmanNorton, Julia@Coastal; Wehrmeister, Tina@City of Pacifica
Subject: Support managed retreat in Pacifica's LCP

I am writing to express my support for the comments provided by the Coastal Commission on the need for managed retreat in the Pacifica LCP.

Pacifica has already suffered from the lack of planning and infrastructure repositioning to minimize the impact of coastal erosion. Buildings have been dangerously undermined. Builders and developers continue to plan developments that are likely to be endangered within the next 10-20 years. I appreciate the efforts of the Commission to get City managers to realistically appraise the risks resulting from sea level rise. This will enable the City to take reasonable steps to pull essential infrastructure back from the coast, reducing risk to residents and visitors, as well as to non-human life in the ocean, and to the environment.

Please continue to follow the science, rather than succumbing to pressure from realtors and developers who refuse to look at what is no longer even long-term risk.

Thank you.

Deeg Gold
Pacific Manor, Pacifica CA

Ringuette, Oceane@Coastal

From: Stan Zeavin <margstan@sbcglobal.net>
Sent: Friday, January 3, 2020 4:35 PM
To: Bonny O'Connor; Rexing, Stephanie@Coastal; KoppmanNorton, Julia@Coastal
Subject: Fw: comments
Attachments: The case for managed retreat.pdf; New film shows Staten Island neighborhoods transformed by climate change - Curbe.pdf; Coastal Resiliency Chesapeake Bay.pdf; Florida Keys Deliver a Hard Message_ As Seas Rise, Some Places Can't Be Saved - .pdf; Sea Level Rise Hits Home at NASA.pdf; Rolling Easement Wetlands Watch.pdf

Dear City and CCC,

Please include the information below as an addendum to my previous letter.

Attached are several articles referencing sea level rise adaptation and highlighting the need to consider all SLR adaptation options in Pacifica's LCP. After careful study and consideration of options, managed retreat implementation is currently underway in multiple states including Alaska, Florida, New York, New Jersey, Virginia, Maryland, Louisiana and Texas.

- The attached article on rolling easements as a SLR adaptation measure references an EPA article discussing adaption, including managed retreat, from the federal perspective.
- The attached article on how NASA is adapting to sea level rise discusses how this agency has been planning and implementing multiple adaptation measures, including managed retreat. NASA has a huge budget which allows them to spend tens of millions of dollars on SLR planning.

Pacifica hasn't even a fraction of the needed funding to repair existing storm damage to the Beach Blvd seawall and other infrastructure, let alone funding to pay for ongoing sand replenishment as discussed in the LCP. Pacifica must prioritize spending our public money on protecting and moving public infrastructure inland as well as protecting coastal access to our beaches - a crucial public resource. Pacifica's lack of funding and need for resilient coastal planning mandate a consideration of every adaptation measure in our LCP, including managed retreat.

Thank you,
Margaret Goodale

Ringuette, Oceane@Coastal

From: Stan Zeavin <margstan@sbcglobal.net>
Sent: Thursday, January 2, 2020 1:33 PM
To: Wehrmeister, Tina@City of Pacifica; Rexing, Stephanie@Coastal; KoppmanNorton, Julia@Coastal
Subject: Consultation Draft Local Coastal Program Land Use Plan Update

Ms. Wehrmeister, Ms. Rexing, Ms. Koppmannorton,

I fully support the CCC's thorough and thoughtful comments about Pacifica's LCLUP.

In the current political climate of denial and fear that our City must deal with, I very sincerely appreciate the straightforward and sane approach of the CCC staff to the real problems facing us with sea level rise.

The survival of so many coastal towns like Pacifica will depend entirely on whether local jurisdictions can begin to plan realistically in the face of ever increasing sea level rise and decreasing availability of funding.

The difficult role the CCC is mandated to play is incredibly important to the entire state of California as well as our local our economy which depends in part on tourists visiting our beaches.

With gratitude,

Margaret Goodale
1135 Palou Drive
Pacifica CA 94044

Ringuette, Oceane@Coastal

From: chaya gordon <chaygordo@yahoo.com>
Sent: Friday, January 3, 2020 5:00 PM
To: KoppmanNorton, Julia@Coastal; Rexing, Stephanie@Coastal
Cc: Wehrmeister, Tina@City of Pacifica
Subject: Pacifica's proposed draft update to LCP

Dear California Coastal Commission,

As a resident of Pacifica who lives close to the ocean, I want to express my support of the Coastal Commission's belief and determination that sea level rise is here to stay, and all coastal areas need to include managed retreat as an option for long term planning in the coastal zone. Pacifica has already lost many residential structures due to coastal erosion. We have no time to spare. We cannot rightfully pursue options that will delay the inevitable effects of sea level rise.

Thank you very much.
Chaya Gordon
Pacifica, CA

Ringuette, Oceane@Coastal

From: Rexing, Stephanie@Coastal
Sent: Monday, January 6, 2020 4:25 PM
To: KoppmanNorton, Julia@Coastal
Subject: FW: Managed Retreat

From: Donna Grant
[mailto:dgrantart@gmail.com] **Sent:** Friday,
January 03, 2020 10:47 AM
To: Rexing, Stephanie@Coastal
Subject: Managed Retreat

Dear California Coastal Commission

I am a Pacifica resident and am writing in support of the commission's decision that managed retreat needs to be an option included in our local coast plan. I, like many Pacifica residents, support long range planning for sea level rise that considers multiple options, protects local beaches, and reduces long run financial risks to the city and homeowners.

Sincerely,

Donna and Ron Grant
830 Reina Del Mar Ave.
Pacifica, CA 94044

--

Donna Grant
mobile: (650) 678-5501 home: (650) 738-5988

Ringuette, Oceane@Coastal

From: pawzitivity@yahoo.com
Sent: Thursday, January 2, 2020 6:08 PM
To: KoppmanNorton, Julia@Coastal
Cc: Wehrmeister, Tina@City of Pacifica
Subject: Comments re Pacifica's LCP

Dear Ms. Koppman Norton,

We, like many Pacifica residents, support long-range planning for sea level rise that considers multiple options (including managed retreat), protects local beaches, and reduces long-run financial risks to Pacifica and Pacifica homeowners. We are, therefore, writing to support the Coastal Commission's directive that managed retreat needs to be included in Pacifica's LCP, as one of the potential ways in which to plan for and address sea level rise.

Regrettably, the term "managed retreat" has been weaponized by SAMCAR, developers, and related special-interest groups to instill (then exploit) fear in affected coastal residents, who are being manipulated into serving as their sympathetic mouthpieces. The sole goal of these special-interest groups is to reap short-term profits without regard for who will pay for the long-term consequences of their actions.

These special-interest groups achieve their objectives by, among other things, spending hundreds-of-thousands of dollars on local elections to elect like-minded city council members, and by convincing homeowners that, if managed retreat is left on the table, homeowners in the coastal zone will, for example, be unable to remodel a bathroom or fix a leaky roof, or that they will be required to tell prospective buyers that their land is virtually worthless due to looming managed retreat. The level of disinformation being promoted in Pacifica by special-interest groups is shameful, but *very* persuasive.

While I empathize with some of the concerns of my coastal neighbors (homeowners, and business owners) whose property values may one day be affected by aspects of managed retreat, the reality is that not acknowledging and planning for sea level rise, is not a viable solution for the needs of Pacifica as a whole. Armoring the coast with sea walls, then seeking to replenish beaches, are also not feasible, long-term, general solutions. Pacifica does not have the money to pay for these ideas, and, to the extent that we armor the coast, rising seas will ultimately overwhelm the armoring, bringing us back to square one.

That said, I also believe that the Coastal Commission needs to do a much better job of explaining the meaning of "managed retreat" in terms affected lay people can understand, including fleshing out the details of such things as the nature of potential required disclosures and proposed restrictions (if any) on basic home improvements, so as to address the legitimate concerns of people who own property in the affected areas. By *not* doing so, the Coastal Commission is unwittingly arming the special-interest groups, who are exploiting ambiguities to spread disinformation, so as to gin up fear and opposition to managed retreat.

We know that protecting the coast and coastal-zone residents is a difficult job and we thank you for your efforts. If there is a practical way to engage the affected communities directly -- to come to us instead of requiring people whose busy jobs and lives do not afford them the luxury of attending out-of-town meetings and reading the reams of material necessary to overcome the disinformation campaign being waged by special-interest groups -- perhaps we can make some headway as a community and defeat those whose only goal is to take the money and run.

Regards,

Dina and Tom Horan
Pedro Point Residents and Homeowners

Ringuette, Oceane@Coastal

From: Cynthia Kaufman <kaufman.cynthia13@gmail.com>
Sent: Wednesday, January 1, 2020 6:42 PM
To: KoppmanNorton, Julia@Coastal; Rexing, Stephanie@Coastal
Cc: Wehrmeister, Tina@City of Pacifica
Subject: Pacifica's Local Coastal Plan

Dear Coastal Commissioners,

Thank you so much for insisting that Pacifica plan for the possibility of managed retreat. Our political system had been bombarded with money from real estate interests who want to keep heads in the sand for as long as possible to keep coastal property values high for as long as possible. On our own, against that onslaught of cash, we have not been able to keep a city council in place that is willing to face the future with courage. Indeed, the present council not only doesn't want to plan for possible retreat, it continues to approve building projects right on the beach.

The courage and integrity of the Coastal Commission has been a breath of fresh air.

Thank you for your work.
Cynthia Kaufman, Pacifica resident.

Ringuette, Oceane@Coastal

From: Rexing, Stephanie@Coastal
Sent: Monday, January 6, 2020 12:58 PM
To: KoppmanNorton, Julia@Coastal
Subject: FW: Managed retreat

From: Summer Lee [mailto:summerleeart@yahoo.com]
Sent: Wednesday, January 01, 2020 9:09 PM
To: Wehrmeister, Tina@City of Pacifica
Cc: ulia.koppmannorton@coastal.ca.gov; Rexing, Stephanie@Coastal
Subject: Managed retreat

Dear California Coastal Commission,

I am a Pacifica resident since 1999 and am writing in support of the commission's decision that managed retreat needs to be an option included in our local coast plan. I, like many Pacifica residents, support long range planning for sea level rise that considers multiple options, protects local beaches, and reduces long run financial risks to the city and homeowners.

Please heed the wisdom of valuing long-term planning over short term profit-protection — the wisdom to not fall prey to special interests that do not consider the greater welfare of our community — that wisdom which is the ultimate role of regulatory agencies like the CCC.

Sincerely,
Summer Lee

Ringuette, Oceane@Coastal

From: Peter Loeb <peterloeb1@gmail.com>
Sent: Wednesday, January 1, 2020 7:32 PM
To: Wehrmeister, Tina@City of Pacifica; KoppmanNorton, Julia@Coastal; Rexing, Stephanie@Coastal
Subject: I support the Coastal Commission comments as stated in their letter of Nov. 22, 2019

In particular, I support this key paragraph:

In general, the hazard and coastal resilience policies seem to recommend an approach for protecting development throughout the City with hard armoring, supplemented by potential beach nourishment, with no policies that would allow the City to prepare to relocate structures out of hazardous areas. The emphasis on armoring would likely result in the loss of beaches and their associated public access, recreation, economic, and habitat benefits as sea levels rise, and would leave the City unprepared for sea level rise in the long term. While armoring may protect existing development in the short- to medium term, such an approach may not be technically or economically feasible in all areas and/or over longer timeframes, and would not, by itself, be consistent with Coastal Act requirements to ensure protection of coastal resources. Policies should be framed to better balance the dual Coastal Act goals of ensuring safe development and protecting coastal resources such as beaches, habitat, and public access and recreation, as sea level rises over time. As discussed in our previous comment letters and in recent coordination calls, Commission staff would be happy to work with City staff in developing a more appropriate balance of short- and long-term approaches, including those that would consider the use of shoreline armoring.

Peter Loeb
411 Maitland Road
Pacifica, CA 94044

Ringuette, Oceane@Coastal

From: Andrew Meiman <andrew.meiman@gmail.com>
Sent: Friday, January 3, 2020 6:13 PM
To: o'connorb@ci.pacifica.ca.us; KoppmanNorton, Julia@Coastal
Subject: support for the Coastal Commission comments

Bonnie, Julia -

I am writing in support of the Coastal Commission's comments on the LCP Consultation Draft, particularly those that support the concerns the Pedro Point community has with the land use designation of the Calson field. Additionally, I support the Commission's comments that direct the City to consider a more comprehensive set of measures and policies to deal with sea level rise over time and balance out the current draft's over-reliance on costly armoring and beach nourishment.

Sincerely,
Andrew Meiman
Pedro Point

1/2/20

TO: California Coastal Commission

julia.koppmannorton@coastal.ca.gov

stephanie.rexing@coastal.ca.gov

FROM: Suzanne Moore

suzyqettu2@gmail.com

RE: Pacifica Coastal Plan

Dear California Coastal Commission

I am a Pacifica resident and am writing in support of the commission's decision that managed retreat needs to be an option included in our local coast plan. I, like many Pacifica residents, support long range planning for sea level rise that considers multiple options, protects local beaches, and reduces long run financial risks to the city and homeowners.

copies to: Tina Wehrmeister: wehrmeister@ci.pacifica.ca.us

Ringuette, Oceane@Coastal

From: JEFF MOROSO <jmoroso@mac.com>
Sent: Wednesday, January 1, 2020 7:47 PM
To: KoppmanNorton, Julia@Coastal; Rexing, Stephanie@Coastal
Subject: Managed Retreat

Dear California Coastal Commission

I am a Pacifica resident and am writing in support of the commission's decision that managed retreat needs to be an option included in our local coast plan. I, like many Pacifica residents, support long range planning for sea level rise that considers multiple options, protects local beaches, and reduces long run financial risks to the city and homeowners.

The alternative is un-managed retreat which would be a disaster!

Sincerely,

Jeff Moroso
415-509-3050
jmoroso@mac.com

Ringuette, Oceane@Coastal

From: Blue Murov <bluemurov@gmail.com>
Sent: Friday, January 3, 2020 12:14 PM
To: Wehrmeister, Tina@City of Pacifica; KoppmanNorton, Julia@Coastal; Rexing, Stephanie@Coastal
Subject: Coastal Commission plan

I am a resident of Pacifica in the Pacific Manor area. I support the positions stated in the CCC comment letter. I am glad to see the CCC is for managed retreat and hope that you will stand by this plan now and in the future.

Sincerely,
Blue Murov

Ringuette, Oceane@Coastal

From: Joanne Gold <joannegold@yahoo.com>
Sent: Sunday, November 3, 2019 11:11 AM
To: Carl, Dan@Coastal; Manna, Jeannine@Coastal; Rexing, Stephanie@Coastal; KoppmanNorton, Julia@Coastal; Ginsberg, Jo@Coastal
Cc: Kevin Woodhouse; Wehrmeister, Tina@City of Pacifica; murdockc@ci.pacifica.ca.us; Marcia And/or David; Cherie Chan; Samuel Casillas; Allison West
Subject: PPCA Comments on the LCLUP submitted by the City of Pacifica
Attachments: PPCA Comments_City of Pacifica LCP_11.3.19.pdf

Dear California Coastal Commissioners of the North Central Coast District Office,

We are contacting you on behalf of the Pedro Point Community Association (PPCA) regarding the Local Coastal Land Use Plan recently submitted by the City of Pacifica.

As a non-profit community association, the PPCA serves to provide a voice for its residents, businesses, and property owners in the shaping of Pedro Point as integral part of the broader Pacifica community.

After gathering extensive community feedback, we are writing to state that the PPCA is strongly opposed to the City of Pacifica's recommendation to designate the land use of the Caslon field on San Pedro Ave. as Commercial-Recreational-Mixed Use (CRMU).

Instead, the PPCA urges the Coastal Commission to designate the Calson Field as either Low Intensity Visitor-Serving Commercial (LIVC) or Conservation (C), based on Sea Level Rise and tsunami evacuation zone data previously presented by the PPCA in meetings with the Coastal Commission on 9/18/19.

On a related note, we also urge the Coastal Commission to **disallow any further development of hotels/motels** in the Pedro Point neighborhood and require **adherence to current height limits of 35 feet for all projects**, in order to preserve visual impacts along the coast.

We deeply appreciate the Coastal Commission's steadfast commitment to protect, conserve, restore, and enhance the environment of the California coastline, and thank you for your attention to this sensitive coastal parcel adjacent to the beautiful Pacifica coastline.

Sincerely,

Marcia Settel
PPCA President
650-355-8731

Joanne Gold
PPCA Vice President
650-270-8574

Ringuette, Oceane@Coastal

From: Karen Rosenstein <karetaker@catsincharge.com>
Sent: Friday, January 3, 2020 1:57 PM
To: KoppmanNorton, Julia@Coastal; Rexing, Stephanie@Coastal; Wehrmeister, Tina@City of Pacifica
Cc: Karen Rosenstein
Subject: Pacifica LCP must include Planning for Sea Level Rise!!

Dear California Coastal Commission,

My husband and I have lived in Pacifica for over 22 years now. During this time, we've noticed multiple changes that make us very aware of the Pacific Ocean's ability to shape and change our town's geography. Here's just three...

1. The popular hiking trail that goes up to the top of the bluffs from above the mouth of Calera Creek next to the parking lot has been moved twice because of eroding cliffs.
2. I attended a work conference in Las Vegas a few months after the house on Esplanade fell into the Ocean. When I was asked where I lived and responded with Pacifica, CA, the news story featuring this event was always mentioned.
3. The walkway and street north of the Pacifica Pier (aka Beach Blvd.) is always damp now despite no rain and the street often has sand and beach rocks in it. Waves cresting over and splashing people, like we experienced yesterday, is much more frequent than 22 years ago.

I'm glad to see that the CCC wants the City of Pacifica, and its citizens, to be pro-active in making long term plans now for our town that address this not-going-away problem Pacifica faces. We feel that by addressing this problem now is the smart way to proceed on this ever changing planet of ours.

Please keep planning for managed retreat in the City of Pacifica's LCP.

Thank you!

Karen Rosenstein
200 Troglia Terrace
Pacifica, CA 94044

I am a Pacifica resident and am writing in support of the commission's decision that managed retreat needs to be an option included in our local coast plan. I, like many Pacifica residents, support long range planning for sea level rise that considers multiple options, protects local beaches, and reduces long run financial risks to the city and homeowners.

Sincerely,
XXX

Ringuette, Oceane@Coastal

From: Pete Shoemaker <bentshoe@igc.org>
Sent: Wednesday, January 1, 2020 6:50 PM
To: Rexing, Stephanie@Coastal; KoppmanNorton, Julia@Coastal
Cc: Wehrmeister, Tina@City of Pacifica
Subject: CCC on Pacifica Sea Level Rise

I support the Coastal Commission's position on facing the reality of the impact of sea level rise on Pacifica. All options should be discussed, including managed retreat, however it is called. The real estate industry has put a great deal of money into Pacifica politics to further their interests, and they do not have the "greater good" in mind. The Commission does have that mandate, so please stand up to these narrow-minded people and do your duty.

Pete Shoemaker
351 Keith Ave., Pacifica
Resident for 30 years

Ringuette, Oceane@Coastal

From: Julie Starobin <juliestarobin@gmail.com>
Sent: Friday, January 3, 2020 1:45 PM
To: KoppmanNorton, Julia@Coastal; Rexing, Stephanie@Coastal
Cc: Wehrmeister, Tina@City of Pacifica
Subject: Managed Retreat for Pacifica

To the California Coastal Commission

I am a Pacifica resident and am writing in support of the commission's decision that managed retreat is a necessary option included in our local coast plan. I wholeheartedly support long range planning for sea level rise that considers multiple options.

Sincerely,

Julie Starobin
Pacific Manor

Ringuette, Oceane@Coastal

From: Dinah Verby <dinahv@earthlink.net>
Sent: Friday, January 3, 2020 4:25 PM
To: Wehrmeister, Tina@City of Pacifica; KoppmanNorton, Julia@Coastal; Rexing, Stephanie@Coastal
Cc: Dinah Verby
Subject: Comments on Pacifica's Local Coastal Plan Update

To Whom It May Concern:

I am a Pacifica resident and am writing to support the Coastal Commission staff's comments dated November 22, 2019.

I believe that the City's current draft does not meet the goals and policies of the California Coastal Act (as adopted by the voters), for the reasons stated in the Coastal Commission staff comments.

I am concerned that the City Council majority is not considering the ultimate cost to the City – financially and in terms of loss of physical and natural resources – from failing to include and plan for managed retreat as one of many options to confront sea level rise. From my observation and experience, armoring alone is not a proven long-term solution and it ultimately fails, while resulting in shoreline erosion and loss of beaches.

While I understand the fears of homeowners close to the shoreline, eliminating the words “managed retreat” from the LCP update will not avoid the devastating impacts of our expanding and rising seas.

Thank you for considering my comments.

Dinah Verby
Valleymar, Pacifica

Ringuette, Oceane@Coastal

From: Marilyn Weeks <mgweeks17@sbcglobal.net>
Sent: Thursday, January 2, 2020 8:27 AM
To: KoppmanNorton, Julia@Coastal
Subject: CCC

I am a Pacifica homeowner and I support the decision by the California Coastal Commission to include managed retreat for sea level rise. I understand that managed retreat includes many options and strategies. The waters will rise. Our only choice is between managed or unmanaged. I choose managed.

Sincerely, Marilyn Weeks

Ringuette, Oceane@Coastal

From: Stan Zeavin <margstan@sbcglobal.net>
Sent: Monday, September 23, 2019 4:04 PM
To: Rexing, Stephanie@Coastal; KoppmanNorton, Julia@Coastal; Manna, Jeannine@Coastal
Subject: City of Pacifica LCLUP Consultation Draft

Follow Up Flag: Follow up
Flag Status: Flagged

Hi, Julia and Stephanie,

I tried to load the new City of Pacifica's LCLUP Consultation Draft. It's too big for an attachment on the laptop, but if you're interested, here is a link: <https://cityofpacifica.egnyte.com/dl/QTzCvBcYX3/>

My guess is the CCC may not be aware as yet of this particular iteration of the LCLUP. What is of particular interest is section 6, Coastal Resilience. SLR is now in a separate category from other natural hazards. I am appalled. At first glance it seems that our beloved city has once again eliminated even more of the suggested CCC guidelines. Concerning SLR, both hazards and trigger points, if used at all, are, at best, vague. It looks like the city's response to most future trigger points is to build more protections. There doesn't seem to be any serious attempt to create alternatives to more walls.

There are probably many other points to be made, but at this time I'm on vacation up in the wilds near Mt. Baker here in Washington and don't want to spend much time on this. It is my understanding that there will be a Pacifica City Council Meeting on September 30 to review or vote on the acceptance of this document, either as is, or, with whatever changes they make between now and then.

If you already have a copy or other more important things on your calendar, i apologize for taking your time.

Thanks again for all your fine work,

Stan Zeavin

From: Stan Zeavin [mailto:margstan@sbcglobal.net]

Sent: Monday, September 23, 2019 4:04 PM

To: Rexing, Stephanie@Coastal; KoppmanNorton, Julia@Coastal; Manna, Jeannine@Coastal

Subject: City of Pacifica LCLUP Consultation Draft

Hi, Julia and Stephanie,

I tried to load the new City of Pacifica's LCLUP Consultation Draft. It's too big for an attachment on the laptop, but if you're interested, here is a link: <https://cityofpacifica.egnyte.com/dl/QTzCvBcYX3/>

My guess is the CCC may not be aware as yet of this particular iteration of the LCLUP. What is of particular interest is section 6, Coastal Resilience. SLR is now in a separate category from other natural hazards. I am appalled. At first glance it seems that our beloved city has once again eliminated even more of the suggested CCC guidelines. Concerning SLR, both hazards and trigger points, if used at all, are, at best, vague. It looks like the city's response to most future trigger points is to build more protections. There doesn't seem to be any serious attempt to create alternatives to more walls.

There are probably many other points to be made, but at this time I'm on vacation up in the wilds near Mt. Baker here in Washington and don't want to spend much time on this. It is my understanding that there will be a Pacifica City Council Meeting on September 30 to review or vote on the acceptance of this document, either as is, or, with whatever changes they make between now and then.

If you already have a copy or other more important things on your calendar, i apologize for taking your time.

Thanks again for all your fine work,

Stan Zeavin

To: Pacifica City Council

Date: December 10, 2018

Subject: Sea Level Rise Adaptation Plan discrepancies within the Pedro Point section for property known as the "Calson Field"

Dear City Council:

In review of the proposed Sea Level Rise Adaptation Plan there are multiple areas of needed corrections concerning the undeveloped five acres of land known as the Pedro Point Field or "Calson Field". To these points there are multiple issues:

1. On page 73 of the "Wetlands" section of the plan it states that: *"There are two primary areas of wetland habitat in Pacifica: wetlands in Laguna Salada and wetlands at the mouth of San Pedro Creek"* when in fact the whole of the Calson Field is a documented designated federal wetland in the USFWS wetland National Wetlands Inventory. This error is also in the Appendix B as an "unconfirmed wetland" that also needs correction (see Exhibit A).
2. The same section on wetlands states that "No data on CRLF are available for the local lagoon <in San Pedro Creek>". The culvert that leads to San Pedro Creek running along this property has been documented as a known California Red Legged Frog habitat (see Exhibit B).
3. Most importantly the Pacifica Institutes hazard map and program models the Pedro Point "Calson Field" to be fully under water with 4.6 ft. of SLR. Pacifica is using a 5.7 ft scenario, yet it only shows a portion of the field under flooding in its SLR scenario. This also needs to be corrected. Note that FEMA also utilizes utilizes the Pacific Institute as source for their SLR flood mapping (See exhibit C)
4. For the "Transfer of Development Credits(TDRs) section for Pedro Point this property should fall under the Guidance of the Recommendation of the State of California's "Natural Resources Agency(NRA) Safeguarding California: Reducing Climate Risk Adaptation Strategy. This document states on page 12 paragraph 4: *One opportunity to achieve broad environmental benefits is through the use of natural infrastructure solutions to mitigate climate risk. Restoration and conservation of natural systems such as forests, grasslands and shrublands, agricultural lands, and wetlands can provide more resilient natural systems that also offer protection from climate impacts. For example, wetlands can provide protection from flooding, while also providing valuable habitat and other hydrological benefits. Prioritizing these solutions can maximize the benefits of investments to reduce climate risks by providing a broad portfolio of benefits across several sectors.* (Please note that the Pacifica adaption plan erroneously rebutted a comment on this mitigation strategy from Alison West that this strategy can only be implemented on publically owned land. The NRA document does not state anything on ownership and the cities own TDR strategy states that it should work with private land owners in other areas of Pacifica; the same TDRs should apply here.
5. This NRA document also states on page 179 paragraph 1: In order to minimize the adverse effects of sea-level rise and storms, it is important to carefully consider decisions regarding areas vulnerable to flooding, inundation and erosion. The state should not build or plan to build, lease, fund, or permit any significant new structures or infrastructure that will require new protection from sea-level rise, storm surges or coastal erosion during the expected life of the structure, beyond routine maintenance of existing levees or other protective measures, unless there is a compelling need. Again the best use of this property is for flood mitigation and not development.

In consideration of the above issues this SLR adaptation plan needs to be corrected to consider the above documentation so that proper planning can be conducted in the aforementioned property known as the Calson Field in Pedro Point which should be considered as flood mitigation undevelopable land to protect against future SLR.

Sincerely,

Samuel Casillas
Resident of Pedro Point

Exhibit A: Federally designated Wetland encompassing the whole of "Calson Field"



Exhibit B: Documented Protected Species Habit Range for California Red Leg Frog

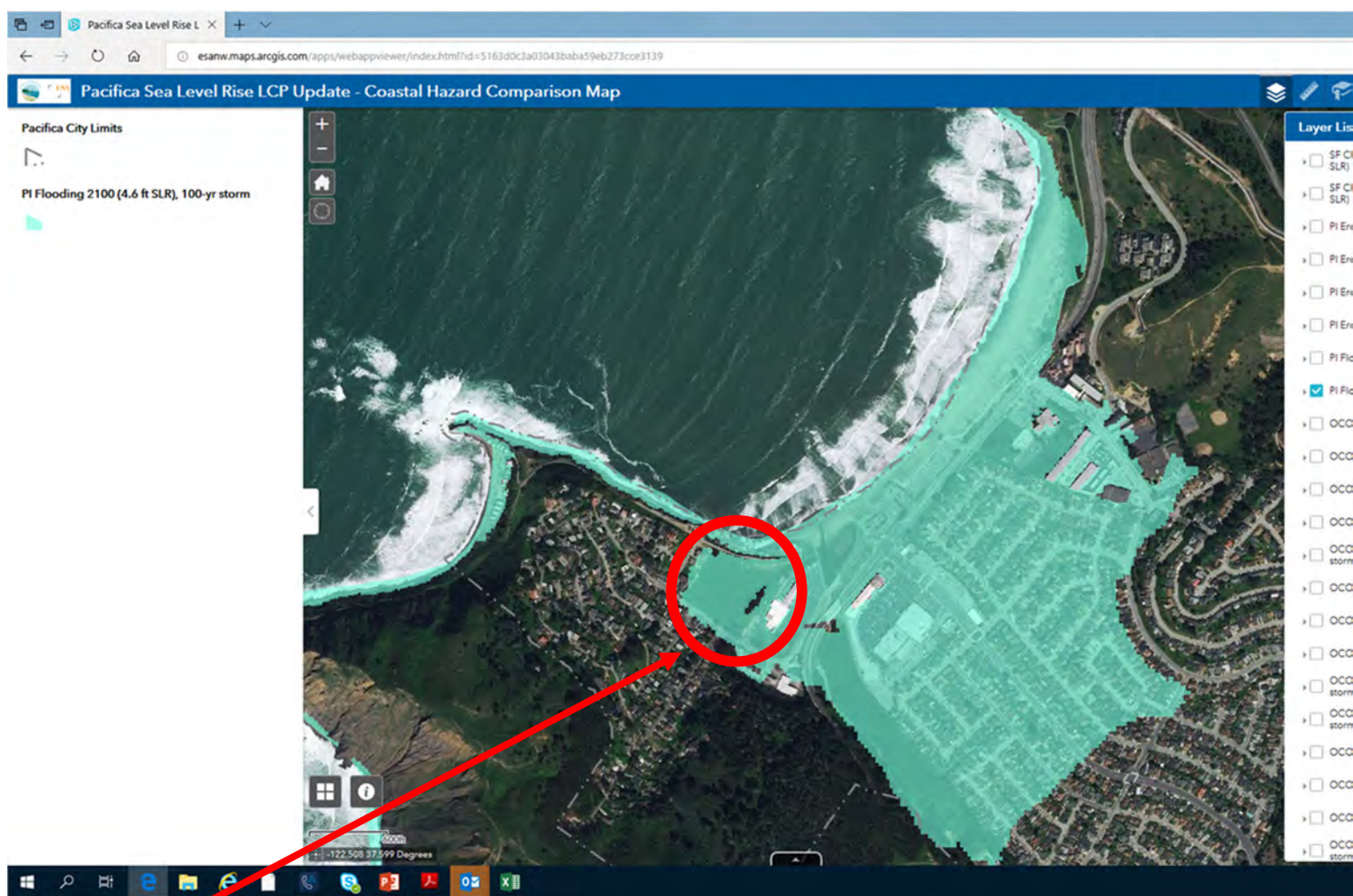


Intermittent breeding habitat of California red-legged frogs in freshwater marsh swale bordering the southeast corner of the field, near roadside culverts. An adult CRLF is shown at the concrete base of foundation culvert on August 20, 2006, after the field ditch connections were breached to the swale north of this pool. CRLF frequently bask in the western muddy or grassy banks of this pool in wet (non-drought) years.

Source: Peter Baye, PhD, Coastal Ecologist:

https://docs.wixstatic.com/ugd/7be690_c88d492841674f999799463d94e5058e.pdf

Exhibit C: Pacifica Institute SLR Map at 4.6 Ft of Flooding



Pedro Point "Calson Field" is under water with 4.6 ft. of SLR with Pacifica Institute's mapping. Pacifica is using 5.7 ft scenario. FEMA utilizes Pacific Institute as source for their mapping.

From: [Jeff Guillet](#)
To: [CoastalLCPGrantProgram](#); [Foster.Patrick@Coastal](#); [Nathan.daniel@coastal.ca.gov](#); [nancy.cave@coastal.ca.gov](#); [Cavalieri.Madeline@Coastal](#); [Carl.Dan@Coastal](#); [Ducklow.Kelsey@Coastal](#); [Rexing.Stephanie@Coastal](#); [Ainsworth.John@Coastal](#)
Subject: FW: Comments on Pacifica Draft LCP Policies
Date: Monday, October 1, 2018 11:16:34 AM

Forwarding to correct email addresses.

From: Jeff Guillet <>

Sent: Sunday, September 30, 2018 10:32 AM

To: 'sealevelrise@ci.pacifica.ca.us' <sealevelrise@ci.pacifica.ca.us>; 'rharrisjr1@gmail.com' <rharrisjr1@gmail.com>; 'Foster.Patrick@Coastal.ca.gov' <Foster.Patrick@Coastal.ca.gov>; 'CoastalLCPGrantProgram@coastal.ca.gov' <CoastalLCPGrantProgram@coastal.ca.gov>; 'cgroom@smcgov.org' <cgroom@smcgov.org>; 'dhorsley@smcgov.org' <dhorsley@smcgov.org>
Cc: 'o'neillm@ci.pacifica.ca.us' <o'neillm@ci.pacifica.ca.us>; 'keenerj@ci.pacifica.ca.us' <keenerj@ci.pacifica.ca.us>; 'digres@ci.pacifica.ca.us' <digres@ci.pacifica.ca.us>; 'martind@ci.pacifica.ca.us' <martind@ci.pacifica.ca.us>; 'vaterlauss@ci.pacifica.ca.us' <vaterlauss@ci.pacifica.ca.us>; 'marc.hershman@sen.ca.gov' <marc.hershman@sen.ca.gov>; 'marc.hershman@sen.ca.gov' <marc.hershman@sen.ca.gov>; 'Mario.Rendon@asm.ca.gov' <Mario.Rendon@asm.ca.gov>; 'Brian.Perkins@mail.house.gov' <Brian.Perkins@mail.house.gov>; shermfrederick@gmail.com; 'Nathan.Daniel@Coastal.ca.gov' <Nathan.Daniel@Coastal.ca.gov>; 'Carl.Dan@coastal.ca.gov' <Carl.Dan@coastal.ca.gov>; 'Ainsworth.John@Coastal.ca.gov' <Ainsworth.John@Coastal.ca.gov>; 'Rexing.Stephanie@Coastal.ca.gov' <Rexing.Stephanie@Coastal.ca.gov>; 'Cavalieri.Madeline@Coastal.ca.gov' <Cavalieri.Madeline@Coastal.ca.gov>; 'Ducklow.Kelsey@Coastal.ca.gov' <Ducklow.Kelsey@Coastal.ca.gov>; 'gina@samcar.org' <gina@samcar.org>; 'wehrmeistert@ci.pacifica.ca.us' <wehrmeistert@ci.pacifica.ca.us>; 'o'connorb@ci.pacifica.ca.us' <o'connorb@ci.pacifica.ca.us>

Subject: Comments on Pacifica Draft LCP Policies

Attached are my comments to the "Final" Draft LCP Policies.

1. It is unfair for the city to request the public's final comments to a draft that is incomplete. The coastal commission staff will make "substantial" comments to the current SLR adaption plan at very last minute, before public comments close. When can we expect California Coastal Commission comments to be released to public? The public demands an equal amount of time to review and comment on those changes.
2. The "data" that ESA produced (mostly developed by themselves) has not been peer reviewed. The public demands time and funds to perform a peer review using the grant money that the city was given to produce the data for the report.
3. How much of the LCP grant funds remain - if any? Let the public use them for an impartial peer review.
4. The Draft LCP Policies say, *"Managed retreat is not included in any of the near-term policies."*

Managed retreat would be reconsidered in the mid- to long-term if feasibility and monitoring warranted, as detailed in Hazard Policy 5 and Hazard Policy 6.” However, General Hazard Policy 4 (Shoreline Adaptation Plan) says, *“The City shall implement its Sea-level Rise Adaptation Plan (Appendix xx) as expressed in the LUP’s general and sub-area coastal hazard adaptation policies.”* This is bait-and-switch – nothing more. The Sea-Level Rise Adaptation Plan mentions managed retreat 95 times. This language must be struck from the Sea-Level Rise Adaptation Plan, as well as any reference documentation.

5. Hazard Policy 26 mentions, *“Elevate development structures as necessary to mitigate flood damage, consistent with existing height limitations.”* Putting houses on stilts ***IS*** managed retreat!
6. Hazard Policy 46, which indemnifies the city and holds it harmless, is illegal and will be fought with many lawsuits. Remove it from the LCP Policies, otherwise ESA will need to include these litigation costs in the cost benefit analysis.
7. Why is the city requesting an RFP for a hotel in the old waste water treatment site, which is ground zero for all the bad data that ESA has developed? Which is it? Is this a hazard area, as indicated in the reports, or a place to develop a resort?
8. At the Sept. 15th LCP Policy Meeting, ESA said they were going to adjust the cost benefit analysis (after it was already final). Where is that? Has it been formally requested? Based on what objective data? Hiring Surfrider Foundation is NOT a neutral party. Southern California data is not applicable for this area and there is no peer review.
9. The map of Fairway Park West that was continually referenced in the Sept. 15th LCP Policy Meeting is a “guess” at what they would look like in the year 2100 with 5.7ft sea-level rise during a 100 year storm and with all SLR protections removed. That is an unreasonable series of events, especially since the CCC has directed the city and county of San Francisco to maintain the levee. Why is the city using such outlandish predictions for a document that is designed to last 20-30 years? Why does this need to be approved Dec 10?? Why the rush?
10. The term “new development” is entirely too vague and could be taken to mean ANY construction to a property, such as adding an edition, replacing a roof, adding solar panels, etc.
11. The term “shoreline” is too vague. The city needs to have a detailed map available to the public that shows these areas.
12. The document repeatedly references bluffs. Where are these? The city needs to have a detailed map easily available to the public that shows these areas.
13. All references to “city maps”, “hazard zones” and all other external references must have public links to their sources. This document is intentionally vague and confusing. It sends the public and city staff on wild goose chases trying to find the source data.

14. Areas and neighborhoods like Fairway Park West, which are not affected by sea-level rise in the scope of this document, must have a statement made in their policies that they are “exempt” from the policy regulations or be removed from the document entirely. Why have policies for neighborhoods that are, by definition, not in affected zones?
15. There needs to be a policy stating that no policies may go into effect until the public has had at least 60 days to review them.
16. Who or what organization will be responsible for future monitoring and reporting. Sounds like ESA, who wrote these policies, is writing themselves into a sweetheart deal in perpetuity. This is a conflict of interest. At what cost to the city? Where are these funds coming from?
17. Why is this plan subject to review at least every 5 years? This is a very short time period and is designed to keep a steady stream of revenue for ESA and the Surfrider Foundation, both of which are biased and cannot be trusted – hence the need for peer review and public comment.
18. The LCP Policies document that was presented to the public is version 7. Was John Keener or anyone on the city council involved in writing versions 1-7?

– Jeff Guillet

www.nopacificaretreat.com