

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



Scenic Pacifica
Incorporated Nov. 22, 1957

CITY OF PACIFICA
Planning, Building, and Code Enforcement
540 Crespi Dr. • Pacifica, California 94044-3422
(650) 738-7341 • www.cityofpacifica.org

MAYOR
Tygarjas Bigstyk

MAYOR PRO TEM
Sue Vaterlaus

COUNCIL
Sue Beckmeyer
Mary Bier
Christine Boles

March 1, 2023

Stephanie Rexing, District Manager
North Central Coast District
California Coastal Commission
455 Market Street, Suite 300
San Francisco, CA 94105

Re: Local Coastal Land Use Plan Update, March 2023 Agenda Item No. W14a (File No. LCP-2-PAC-20-0036-1)

Dear Stephanie:

I write in regards to the subject Local Coastal Program (LCP) amendment. The City of Pacifica ("City") submitted its application for Coastal Commission certification of a comprehensive amendment to the existing 1980 Local Coastal Land Use Plan (LCLUP) in June 2020. We have eagerly awaited Coastal Commission staff's final recommendation on the application since that time and are pleased to be at this stage in the process.

The City received notice of posting of the Coastal Commission staff report on February 24, 12 days in advance of the March 8th hearing. The comprehensive nature of the LCP amendment combined with the extent and nature of Coastal Commission staff's suggested modifications necessitate more time for the City to review the staff report before participating in a public hearing on the matter. Therefore, the City respectfully requests a continuance to no earlier than the July 2023 meeting so that we can evaluate options to most effectively respond to the Coastal Commission staff's recommendations.

Thank you in advance for consideration of the City's continuance request.

Regards,

Christian W. Murdock, AICP
Planning Director



March 6, 2023

To: Donne Brownsey, Chair, California Coastal Commission

Cc: Kate Huckelbridge, Executive Director, California Coastal Commission
 Julia Koppman Norton, District Supervisor, California Coastal Commission
 Oceane Ringuette, Coastal Planner, California Coastal Commission

Sent via e-mail

Re: Support for Staff Modifications to City of Pacifica Land Use Plan Update

Dear Chair Brownsey and Commissioners,

As leaders from the undersigned organizations, we stand united on the principles that all Californians deserve the opportunity to access and enjoy the California Coast and that the state government has a legal duty to ensure municipalities protect public resources and public trust lands, including beaches and waves. From this basis, we urge the California Coastal Commission to approve Coastal Commission staff's suggested modifications to the City of Pacifica's proposed comprehensive land use plan update (LUP) in their entirety. Without the modifications, the City's proposed plan would undermine key Coastal Act policies that prohibit shoreline armoring and protect coastal resources from coastal erosion and rising seas, and the City's proposal fails to adequately protect coastal habitats.

We are gravely concerned with certain provisions of the LUP's coastal hazard policies, which staff defines as a coastal armoring program that could result in "full armoring" of Pacifica's coast. The LUP provisions would grant unlawful shoreline armoring allowances in certain sub-areas and prohibit consideration of managed retreat. The City proposes definitions of "shoreline," "existing development" and "redevelopment"

(substantial exterior structure modifications) that would greatly expand coastal armoring. The LUP boldly exempts the majority of development within vulnerable coastal hazard zones from analyzing or considering coastal hazards with its narrow definition of “shoreline”. The City’s proposal would also inadequately protect environmentally sensitive habitat area and coastal dunes by failing to define minimum buffer zones or list dunes as protected habitat types.

As such, we agree with the staff report that City’s proposal does not adequately protect coastal resources and cannot be found consistent with the Coastal Act without incorporating all the suggested staff modifications. Importantly, the City’s coastal armoring program must be rejected. **We strongly urge the Commission to approve the City’s Land Use Plan update only with the entirety of Coastal Commission staff’s suggested modifications.**

Major LUP Impacts

The City’s LUP policies would eliminate the possibility for upland migration of coastal habitats and resources and expressly prohibit proactive adaptation policies including managed retreat. Prohibition of managed retreat is shortsighted and a woefully inadequate response to sea level rise. Adaptation requires flexibility and a variety of approaches for the dynamic coast. Proactive planning is essential for avoiding costly disasters such as the condemned blufftop apartment building on Esplanade Avenue due to storm damage and bluff erosion.

The overreliance on seawalls contradicts the state’s priority to conserve 30 percent of our lands and coastal waters by 2030 and threatens the vitality of the City’s spectacular coastal bluffs, beaches, dunes and wetlands. Staff’s modifications are vital for ensuring Coastal Act mandates for habitat protection and wetlands are upheld. Pacifica is home to some of the state’s few remaining wetland habitats, which must be protected from encroaching development with adequate buffer zones.

The City’s broad reliance on shoreline armoring and sub-area armoring allowances would greatly impact public coastal resources, coastal habitats and public trust lands. The LUP must minimize coastal armoring due to its impediment of public beach access. Coastal armoring fixes the back of the beach, coupled with rising sea levels, this is a recipe for narrower beach area or none at all during high tides. The public’s right to access and enjoy the coast will be further curtailed by increased armoring. Coastal armoring not only kills the beaches, it also has a negative impact on waves since the refraction off the seawalls and other hard structures will compromise the natural wave shape and direction.

The City's armoring plan could be devastating for popular surf and recreational beaches such as Linda Mar, Rockaway and Sharp Park Beach because nearby development may become eligible for shoreline armoring. These beaches are visited by millions and beloved for their beginner-friendly waves. They serve as important access points including for surf schools and environmental justice communities in the region. By failing to consider alternatives to armoring, the LUP also destines the beaches fronting Beach Boulevard, Esplanade and Palmetto to permanently drown as seas rise. A [recent report](#) funded by California State University Council on Ocean Affairs, Science & Technology (COAST) released preliminary results that show that beach loss through sea level rise will affect underserved communities the most. Equitable coastal access might become another victim of climate change – unless we plan proactively.

The impacts of hardened armoring on public access, recreation and habitats are too severe to be negated. Any decision short of full incorporation of Coastal Commission staff's suggested modifications could create a very dangerous precedent statewide for managing coastal resources in the face of rising sea levels.

Coastal Act Inconsistencies

We strongly commend Coastal Commission staff for their thorough work to correct the LUP's numerous Coastal Act inconsistencies. We support these modifications in their entirety and highlight several key issues below.

The LUP glossary is an essential element for interpretation of the LUP. The City's definitions play an enormous role in interpreting the proposed policies and determining whether a structure is entitled to shoreline armoring.

Crucially, the City exempts the majority of development within vulnerable areas from analyzing and planning for coastal hazards by limiting the definition of shoreline to the area immediately adjacent to the shore. This leaves development just one block away potentially vulnerable and potentially entitled to shoreline armoring. We support the staff modifications that correct this departure from adequate coastal planning.

The LUP would also allow for a broad interpretation of "existing structure" that is inconsistent with prior interpretations and case law. It would consider all structures "existing" that are built or permitted before the date of certification of the LUP. This goes against standard interpretation that changes in the law are effective from the date of the law going forward. The date of the Coastal Act implementation is largely recognized as

January 1, 1977. The City's LUP also broadly defines redevelopment, referred to as "substantial exterior structure modification," such that a majority of the city would be entitled to armoring into perpetuity. These definitions fail to meet the intention of the Coastal Act to alter the pattern of development landward, away from coastal hazards, erosion and rising seas. Instead, it locks this dangerous pattern of development within hazardous zones and dooms our vital remaining coastal resources.

Coastal Commission staff's modifications will improve the LUP by removing the definition of existing development instead of correcting it. This may ultimately put more burden on limited state resources as City issued coastal development permits with improper interpretation would have to be appealed. We recognize that this may be a necessary temporary compromise to move the City's plan forward.

We further support modifications that protect dune habitat and establish clear buffer zone minimums for sensitive habitats so as to fully comply with Coastal Act sections 30233 (wetlands) and 30240 (ESHA). Wetlands are a significant coastal resource and buffer for sea level rise, adding to resilience capacity for the City. We support staff's call for clarification around natural resource delineation buffer areas and ESHA protections. Californians rely on the wellbeing of the coast and its creatures for economic, recreational and spiritual well-being. Coastal Commission staff's modifications are necessary to ensure the City's sensitive habitats are protected from development, grading and rising seas.

Additional Modifications Needed

We strongly support Coastal Commission staff's modification to remove the City's references that exclude managed retreat as a potential adaptation strategy. If we fail to commit to adaptation pathways that lead to managed retreat, including within urban and suburban areas, we will lose critical coastal habitats and fail to meet state goals for habitat conservation. Nature-based solutions to sea level rise will produce multiple benefits and should be the preferred adaptation method in the LUP.

The City should proactively plan for relocation of aging infrastructure along the coast. **The LUP and staff modifications should explicitly call for planned relocation of the wastewater treatment plant infrastructure along the shoreline, including aging sewage lines and other utility infrastructure as it comes due for repair to move it out of highly vulnerable areas. The City should also plan to redesign the various runoff pipes that protrude from the bluffs for much of the northern portion of Pacifica, which contribute to bluff erosion and often subject to shoreline armoring. Utility infrastructure, especially in Sharp Park, should not be replaced**

in the same location as it creates a perverse incentive for more armoring to protect it.

Additionally, the Coastal Commission staff report acknowledges that there is an unknown amount of unpermitted armoring. **As part of this update, the Commission should require that Pacifica evaluate where unpermitted armoring exists and require its removal.** For all the reasons stated in this letter, removal of unpermitted armoring should be a top priority in sea level rise adaptation planning.

Conclusion

If the Coastal Commission approves the Pacifica LUP as proposed, it will open a Pandora's Box for jurisdictions across the state to copy the full armoring approach and undermine the state's efforts and substantial investments in ensuring equitable coastal preservation as sea levels rise. **Please approve the City's Land Use Plan update only with the entirety of Coastal Commission staff's suggested modifications along with our additional requests, above.**

Sincerely,

Mandy Sackett
California Policy Coordinator
Surfrider Foundation

Kimberly Williams
Volunteer Policy Manager
Surfrider Foundation
San Mateo Chapter

Susan Jordan
Executive Director
California Coastal Protection Network

Kristen Northrup
Policy Advocate
Coastal Environmental Rights Foundation

Pamela Heatherington
Board of Directors
Environmental Center of San Diego

Marce Gutiérrez-Graudiņš
Founder/Executive Director
Azul

Stephanie Chang, MD
Advocacy Specialist
Brown Girl Surf

Andrew Johnson
California Representative
Defenders of Wildlife

Erica Donnelly-Greemam
Executive Director
Save Our Shores

Laura Morgan, MD
Sebastopol, CA



March 3, 2023

California Coastal Commission
455 Market Street
Suite 300
San Francisco, CA 94105
(415) 904-5202
Donne.Brownsey@coastal.ca.gov

RE: City of Pacifica Local Coastal Program Amendment Number LCP-2- PAC-20-0036-1 (City of Pacifica LUP Update)

Honorable Chair Brownsey and members of the Coastal Commission:

Smart Coast California (SCCa) is grateful for the opportunity to submit our comments regarding the City of Pacifica Local Coastal Program Amendment Number LCP-2- PAC-20-0036-1, City of Pacifica Land Use Plan Update. SCCa is a 501(c)3 organization established in 2019 to promote and advocate for smart land use policies affecting California's 1,271 miles of coastline. Smart Coast California is dedicated to community sustainability, property rights and the environment.

Smart Coast California (SCCa) commends the City of Pacifica on producing a detailed Land Use Plan Amendment that balances the goals of protecting healthy beaches, private property, and public access—each a valuable component of the City's shoreline. We are concerned with the suggested modifications as they significantly change the intent of the document, which City of Pacifica has so diligently prepared. City leadership has made the choice to reject managed retreat, and to expressly provide protection for existing development (not just those structures built before the effective date of the Coastal Act January 1, 1977). This document reflects the goals and policies that have been identified as critical to their community.

Smart Coast California would like to express SUPPORT for the City of Pacifica LCPA Land Use Plan as submitted.

Smart Coast California generally OPPOSES the suggested modifications as proposed by the Coastal Commission staff.

SCCa appreciates that the City of Pacifica has made significant investments of both time and resources in planning for Sea Level Rise and have facilitated extensive stakeholder involvement over a number of years resulting in the LCPA/LUP that is specific to the conditions of their locality. SCCa respectfully requests that you certify the Local Coastal Program Amendment Number LCP-2- PAC-20-0036-1, City of Pacifica Land Use Plan as submitted or continue this item

=



for further consideration at a later date. As stated in staff report, the Commission has until December 22, 2023 to take a final action on this LCP amendment. We appreciate your service, and thank you for the opportunity to comment.

Sincerely,

A handwritten signature in black ink, appearing to read "Paul Grisanti", written over a light blue horizontal line.

Paul Grisanti
President
Smart Coast California

Received 782 emails with the following text:

Dear California Coastal Commission Chair Donne Brownse,

I am writing to express my opposition to the City of Pacifica's Land Use Plan update, particularly its proposed coastal hazard policies. The City should pursue coastal planning solutions that address the long-term impacts of sea level rise in a manner protective of public resources - our beaches, bluffs and waves. More effective alternatives consistent with California Coastal Commission recommendations and the Coastal Act include strategic relocation, consideration of living shoreline options and avoidance of hard armoring. Proactive planning is essential for avoiding costly disasters such as the condemned blufftop apartment building on Esplanade Ave due to storm damage and bluff erosion.

As a local beachgoer, I support long-term solutions that benefit my right to beach access, protect coastal resources and habitats and preserve the coast from rising seas as required within the California Coastal Act. The City's plan will erode our beaches over time and make access impossible. The City's plan could be devastating for popular surf and recreational beaches such as Linda Mar, Rockaway and Sharp Park Beach. By failing to consider alternatives, it also dooms the beaches fronting Beach Boulevard, Esplanade and Palmetto to permanently drown as seas rise.

One third of the City's six miles of coast are already armored. More coastal armoring will fundamentally alter our remaining waves and beaches by exacerbating beach erosion and eventually drowning our beaches and waves.

Please reject the City's plan and approve the entirety of Coastal Commission staff's suggested modifications to protect our public resources and preserve our precious coast.

Sincerely,

Corinna Girard

Susan Grant

Nhu Ngo

Samantha Torres

Stan Souza

SYLVIA GLENN

DrewDrew Madsen

Nina Antony

GLENN SPIDELL

Lauren Unger

lonna richmond

doug frazier

Rebecca Salcedo

J. Barry Gurdin

jayne pitchford

Chris Casey

Rae Putnam

John Hall Jr

Sandra Summeril

Lindsay Buente

doug frazier

Mike Monson

Marc Rubel

Victoria Brandon

Crystal Couch

Ava Sassen

Sarah Gurney

Ben Ruwe

Mark Irwin

Christine Nagel

Bob Stevens

Christopher Smith

Charlie O'Brien

Michael Caracozza

Maryellen Redish

J.P. Bruner

Peter Scharnell

cn brisebois

Charles Tribbey

Gregg Oelker

Michael McNamara

Melora Garrison

<i>Richard Busch</i>	<i>Jane Hartman</i>	<i>Kyleigh Garrioson</i>
<i>John Connor</i>	<i>Grant Bixby</i>	<i>Rick Wilson</i>
<i>Elsa Robertson</i>	<i>Jo-Damien Aston</i>	<i>Colleen Bring</i>
<i>Edward Mazzarella</i>	<i>Mike Miner</i>	<i>Bilkly Rankin</i>
<i>Juliet Lamont</i>	<i>David Dolotta</i>	<i>DAVID SOTO</i>
<i>Georgia Hodges</i>	<i>Gloria Grotjan</i>	<i>Steven Bronson</i>
<i>Scott Bell</i>	<i>Hayley Marcus</i>	<i>Pete Stauffer</i>
<i>Mark Higgins</i>	<i>Ron P</i>	<i>Peter Loeb</i>
<i>Benjamin Rubenson</i>	<i>Niko Asai</i>	<i>Cherie Chan</i>
<i>John Marikos</i>	<i>Denise McCulloch</i>	<i>Sonia Gaona</i>
<i>Janet Price</i>	<i>Amy Havin</i>	<i>Nicholas Ferrif</i>
<i>Everett A. Vieira III</i>	<i>Elena Tillman</i>	<i>Therese DeBing</i>
<i>Nona Weiner</i>	<i>Scott Van Fossen</i>	<i>Alivia Alton</i>
<i>John Mockus</i>	<i>JANINE COMRACK</i>	<i>Carolyn Dolen</i>
<i>Jan Pfenninger</i>	<i>Jennifer Johnson</i>	<i>Lisa Conrad</i>
<i>Jeffrey Jones</i>	<i>Wyatt Licht</i>	<i>Mary Simun</i>
<i>christelle whittaker</i>	<i>Andrea Johnson</i>	<i>Leslie Bowen</i>
<i>Noah Haydon</i>	<i>Carolyn Krammer</i>	<i>Jamie Le</i>
<i>Bill Labate</i>	<i>Noah Mabon</i>	<i>Sarah Louie</i>
<i>Ronelle Decker</i>	<i>Steve Anderson</i>	<i>Elizabeth Bettenhausen</i>
<i>Terry Olgin</i>	<i>Keri Briones</i>	<i>Michael Mobley</i>
<i>Leslie Ortega</i>	<i>LeeAnna Diehl</i>	<i>Savannah Stotts</i>
<i>ed iglesias</i>	<i>Caitlin Shields</i>	<i>Heather Hill</i>
<i>Steve Sketo</i>	<i>Gregory Abe</i>	<i>Kurt Loeffler</i>
<i>Inge Lorentzen Daumer</i>	<i>Brunie Felding</i>	<i>Armando A. Garcia</i>
<i>Cindy Abbott</i>	<i>Roth Herrlinger</i>	<i>Rebecca Fenton</i>
<i>ed iglesias</i>	<i>Brett Bring</i>	<i>Tansy Woods</i>
<i>Derrick Claar</i>	<i>Dawn Forster</i>	<i>Parker Day</i>
<i>Gabriel Remon</i>	<i>kent morris</i>	<i>Buuce gordon</i>
<i>Janice Tanaka</i>	<i>Jessica Heiden</i>	<i>Dara Edwards</i>
<i>PETER ADAME</i>	<i>Ethan Thompson</i>	<i>Mark O'Connor</i>
<i>Bill Nelson</i>	<i>Brunie Felding</i>	<i>Guillermina Tocalini</i>

<i>Allison Hushek</i>	<i>Gabriel Lautaro</i>	<i>Nathan Brennan</i>
<i>Rafal Dobrowolski</i>	<i>Walter Erhorn</i>	<i>Kelly Sykes</i>
<i>Nicolas Baldoni</i>	<i>Steve Smith</i>	<i>Lenard Wilson</i>
<i>Francis Hayhurst</i>	<i>Summer Lee</i>	<i>Bill Winternitz</i>
<i>Greg Farnes</i>	<i>Catherine Clay</i>	<i>Rachel Strader</i>
<i>Jonathan Weinstock</i>	<i>John Stout</i>	<i>Mary F Platter-Rieger</i>
<i>Logan Donovan</i>	<i>Henry Bartz</i>	<i>Linda Selvey</i>
<i>Eric Breitbard</i>	<i>Julien Egger</i>	<i>Meaghan Quarles</i>
<i>Terry McDaniel</i>	<i>Michael Hogan</i>	<i>Yazmin Gonzalez</i>
<i>roberta newman</i>	<i>David Wagmeister</i>	<i>Marisa McFarlane</i>
<i>Glen Frank</i>	<i>Lauren Edwards</i>	<i>Lisa Reymann</i>
<i>Marc Silverman</i>	<i>Elaine Benjamin</i>	<i>Kevin Grim</i>
<i>Kyle McNeill</i>	<i>David Rapp</i>	<i>Laura Kowalski</i>
<i>JL Angell</i>	<i>Kerry Boomsliter</i>	<i>Darcy Muirhead</i>
<i>Eric Denys</i>	<i>Antony Tersol</i>	<i>Michael Gilgun</i>
<i>Kenneth Miller</i>	<i>anne veraldi</i>	<i>Michael Esten</i>
<i>Ellen Wade</i>	<i>Jake Matatyau</i>	<i>Kurt Speidel</i>
<i>Megan Morgan</i>	<i>Lily Lau-Enright</i>	<i>Curt no Black</i>
<i>Angela Howe</i>	<i>Logan Wilson</i>	<i>Tom Nulty</i>
<i>George Hegarty</i>	<i>WILLIAM BARHAM</i>	<i>Kevin Matthews</i>
<i>Catherine Wood</i>	<i>S W Hopkins</i>	<i>Dawna Dorcas-Werner</i>
<i>BARBARA KETCHUM</i>	<i>Pamela Gomez</i>	<i>Tanja Goerig</i>
<i>Shawn Johnson</i>	<i>Barry Schneider</i>	<i>Megan Gonzalez</i>
<i>Marie Martin</i>	<i>Lucas Nuttall</i>	<i>Sarah McCarthy</i>
<i>John Fowler</i>	<i>Michelle Sirota</i>	<i>Bob Miller</i>
<i>Steve Loe</i>	<i>HUGH Gurin</i>	<i>kim escalante</i>
<i>Margaret Fowler</i>	<i>Mary Beth Russo</i>	<i>John Varga</i>
<i>Maureen Barrio</i>	<i>Eddie Scanlon</i>	<i>Laurence Altobell III</i>
<i>Cheryle Besemer</i>	<i>Michael Merlesena</i>	<i>Chris Withrow</i>
<i>Rachel Lubich</i>	<i>Olivia Munoz</i>	<i>Christine Nelson</i>
<i>Jennifer Fields</i>	<i>Cynthia Clark</i>	<i>Deborah Collodel</i>
<i>Emily Richie</i>	<i>Nadine Scott</i>	<i>Jill Seagren</i>

<i>Rita Raskin</i>	<i>Taylor David</i>	<i>Tammy Bullock</i>
<i>John Svelan</i>	<i>Aditi Crosby</i>	<i>Bob Keats</i>
<i>Julianna Marciel</i>	<i>Querido Galdo</i>	<i>Julian Croucier</i>
<i>Nicole Lambertson</i>	<i>Lisabette Brinkman</i>	<i>Edi Cooke</i>
<i>Debra Neckanoff</i>	<i>andrew schrage</i>	<i>Marisa Chirico</i>
<i>Madame Gina Roxanne</i>	<i>Melissa Vizcarra</i>	<i>Camryn Wilson</i>
<i>Mary Franz</i>	<i>Joseph Dito</i>	<i>This is not rocket science! Lea</i>
<i>Alex Jelinek</i>	<i>Joseph Coppi</i>	<i>Sebastien Ballesteros</i>
<i>Terry Lucas</i>	<i>Prestyn Vickers</i>	<i>RYAN HARTMAN</i>
<i>Douglas Jacuzzi</i>	<i>Nancy Keatingl</i>	<i>Julie Ford</i>
<i>Claudia Grandez</i>	<i>Michael Johnson</i>	<i>Catherine Geanuracos</i>
<i>Joan Ayton</i>	<i>Miranda Robles</i>	<i>Sid Vance</i>
<i>Lorelei Ranney</i>	<i>Laurie Petronis</i>	<i>Kristy List</i>
<i>Kristina Wunder</i>	<i>Sparrow McMorran</i>	<i>Stephanie Kaupp</i>
<i>Brian Siebert</i>	<i>Julie Wartell</i>	<i>Pamela Hamilton</i>
<i>Scott Henderson</i>	<i>Keri Pommerenk</i>	<i>Miguel Avila</i>
<i>john chayas</i>	<i>Duane Lynwood</i>	<i>Eron Rauch</i>
<i>Benjamin Zeko</i>	<i>Dustin Thomas</i>	<i>James Goethel</i>
<i>Benjamin Zeko</i>	<i>Dustin Thomas</i>	<i>scott tye</i>
<i>Jagjit Chadha</i>	<i>Mike Guerreiro</i>	<i>Oliver Cary</i>
<i>Stephen Bachman</i>	<i>Thorsten Ostrander</i>	<i>Sarah Mica</i>
<i>Erin Foote</i>	<i>Steve Riggs</i>	<i>Victoria Conlon</i>
<i>Kristina Cohen</i>	<i>James Miers</i>	<i>Mark Fernandez</i>
<i>C S</i>	<i>Frank Ortiz</i>	<i>William Harte</i>
<i>Christian lopez</i>	<i>Cyndi Ringoot</i>	<i>Steven Conlon</i>
<i>Gabriel Sanchez Gonzalez</i>	<i>alex bennett</i>	<i>Neil Stanton</i>
<i>Hal Forsen</i>	<i>Schuyler Zimmerman</i>	<i>Mathieu Streiff</i>
<i>Peter Rosenwald</i>	<i>Tamay Kiper</i>	<i>Lillian Hsueh</i>
<i>payton tully</i>	<i>Suzanne Benton</i>	<i>Nyah Kinsey</i>
<i>Mark Pugh</i>	<i>Kevin Baltimore</i>	<i>Denise Halbe</i>
<i>Sophia Bui</i>	<i>Michael Henderson</i>	<i>Jana Menard</i>
<i>Chloe Renn</i>	<i>Katie Bowling</i>	<i>John Gange</i>

Skip Williams
Cathy Marlow
Robert Randall
Randall Hartman
Michellel Kosinski
Amalea Saunders
brad thompson
Anthony Peccarelli
Kevin Lane
Sue Fox
Melissa Waters
David Lemon
Corey Block
John Cloonan
Alyssa Baron
Rob Vercoe
Spencer Brown
Scot Velardo
Martin Tripp
Anthony Bituin
Scott Atkinson
Zach Williams
Elliott Haught
Rubye Strickland
Kathleen Steindlberger
Aaron Zetley
Sarah Boyle
vicki hughes
John Gregory
Edward Rehanek
Meaghan Campbell
Jodi Crocker

Michael Lynn Filio
Matthew Burrows
Anton van Rooyen
Deimile Mockus
Lisa Lougee
Eric Weiss
Zach Knapp
Martin Marcus
Trey Polesky
Sean Lariz
Beth Beringer
Jared Zamaloff
Daphinne Accomazzo
Carisa Silva
Kathy Olavarri
Sapsiri Beale
Devin Cortez
Katie Macfee
Joe Carcamo
kemberle thompson
Ron Roman
grace kinney
Matt Marovich
Karen Madsen
Greg C
john kerr
Tyler Mitic
Michael Tomczyszyn
L. Adams
LindaKim Schulz
Lois Traphagen
Shari Alpern

Brendan Nicholas
Irene Armstrong
Miguel Avila
Steve Bean
Ryan Monroe
Sonia English
Joscey Ramos
caroline o'neal
Michael Kolezar
Carlos Nunez
Marlene Pero
Eric Mar
Nora Coyle
Marissa Kan
Beverly Lips
Karen Downing
gene pao
matthieu jacques
Jennifer Abernathy
Diana Purucker
Edward Pohlman
Margaret Goodale
Dan Earhart
Edie Bruce
Kerry Crawford
JamesJames Laharty
David Corich
Todd Montgomery
Victor Maisano
Laura Graves Smith
Mateo Rivera
Dave Williams

Dom Bhuphaibool

Grace Stearns

Stephen Schulz

Sydney Harris

Giovanna Aurichio

Stacey Lee

Christine Hayes

Hal Bohner

Ashley Melton

Linnea Nichols

Carmen Joseph Dello Buono

Jennifer Thompson

Mary Turnipseed

Kaigen House

Ekekela Novero

Julie Kanoff

Tammy Pao

Paul Lapidus

Julia Halter

Mike Barnes

Olivia Halter

Matthew Hempy

Walter Saygers

Walter Saygers

Amy Jo Deguzis

Christopher Miller

David Rippberger

Thomas Saito

Michael Cronin

Scott Christopher

Chris Ashton

Mark Hubbell

Renee Klein

Erika Rodriguez

Renee Klein

Jim Peugh

Jaclyn De Bonis

Nate Walker

Nancy Heck

Carrie Danielle

Izabel Sharp

Stephen Zelman

Bernadette Szymanowski

Paul Schmidt

Melanie Barna

Matt Ogi

Janet Cohen

Jill Sekiguchi

Lisa Ciani

Mee Mee

Bonnie Owens

Catherine Richmond

Thelma de Castro

Heather Hardison

Richard Ten Eyck

Abbey Austin-Wood

lisa gansky

Alice Polesky

Tom Francis

Joan Smith

Amira Mansour

Teresa Dugan Mansfield

Sigrid Ramos

Laurie Headrick

Brad Snook

Erika Porter

Ritesh Dhuy

Brian McFadden

mark carson

Mark Dinger

jonathan day

beth gould

Marj Davis

Joyce Heyn

Timur Nusratty

Amy Rafiee

Abraham Svoboda

Susan Carnevale

Lisa Passin

Patricia Busk

Brenna Churma

Jesse O'Chapo

Michael McMahan

Joe Lee

Kevin Van Gundy

Ashley Gray

David Beilfuss

Leigh Farrell

Mark Moser

Amber Hulse

Robert Schneider

Joseph Hartman

Carol Wiley

Robert Mignogna

Richard Gates

Ms Courtney

Madeline Stone
Michelle Sparks-Gillis
Dudley Hughes
Tamra Johnson
Danny Firestone
Ella O'Dell-Wilson
Leah Falahee
Jen Bruursema
Olivia Kelly
Tommy Gunther
Maksim Derbin
Kirk Kester
Aaron Campbell
Emily Risdon
Randolph Kimmler
Charlotte Cobb
Tracy Rogers
nate headrick
francesca ciancutti
Meris Walton
Vic Bostock
Taylor Davidson
Michael Lynn Filio
EJ McConaughy
gina anson
Rose Garry
Ann Edminster
Audra Flores
Darryl Bituin
Erin Ashton Ryan
Emmett Malloy
Andrew Boyle

Del Bahner
T. Lewis
Stephanie Luciano
sarah gates
Matthew Cardona
Matthew Lubs
Christopher Holden
William Leon
Jonathon Bartlett
Kathryn Dressendorfer
Madi Pignetti
Brittany Hoey
Angela Sidlow
Rachel Wolf
Randy Gray
Tom Hazelleaf
Kenneth Howell
Keith Hammond
Bruce Campbell
Jason Tose
kevin murphy
Robert Redford
Amy Hoffman
Roy Earnest
Beth Gregg
Madison Pound
Patrice Wallace
Eric Stevens
Bonnie Tsui
Damian Pangelinan
Nasim Razavi
Nasim Razavi

Jill Goldman
David Walters
Phyllis Chavez
Steve Steele
Sarah Thornton
Airielle Silva
Chaya Gordon
Sierra Prescott
Brenda Robbins
Victor Carmichael
Laurie Vann
Kristina Fukuda
Ted Ferris
Megan McSherry
Wendy Camacho
Jaclyn Plasterer
Pat Conroy
Ted Conroy
Scott Martin
Samuel Casillas
Felicia Starros
India Borba
Jon Fell
Carolina Irizarry
Belle Jantomaso
Sally Lacy
Frank Sanders
Cecelia Conover
Trina Aurin
Alexandra Wall
Gary Emich
Barbara Stanley

Marva Ann Johnson

Olivia Angus

Moto Nakanishi

Matthew Brunner

Regan Holub

Kathy Mesch

Elizabeth Levy

sean seagren

David Rowley

Edward Watson

sheila harman

Gloria Garcia

Carolyn Matini

Katrina Nourblin

Sabrina Hogan

Bill McLaughlin

Bill McLaughlin

Paul Apelgren

Adam Clements

Raquel Ponce de Leon

Pamela Hazen

Danielle Rosenthal

Patrick Geraghty

Stuart Bloom

Morgan Feilmeier

Mauricio Rodrigo

Leslie Valencia

Gary Goetz

Ye Khaung

Paulina Cajiao

Ingrid Alvarado

Tyler Toy

Indie Adamich

Bart O'Brien

John Penberthy

Janele GALAZ

Aaron Cedolia

James Dumanovsky

Amy Hanley

Ruta Radzins

Mark Sutherland

Kate Whittingham

Jeff Thayer

Max Bergen

Elisabeth Potts

Ben van Hamersveld

Sarah Gallagher

Jessica Hale

Joan Singleton

John D. Bruner

Joanne Frediani

Lola Miller

Barbara Weber

Rita Frerk

Maria Castro Noboa

Kim Kolpin

Timothy Goodman

Suzanne Moore

Tom Villanueva

John Manocchia

Lorraine Boyd

Tom Leko

Isabella Gaytan

Bonnie Earls-Solari

James Frazier

STEPHANIE HESS

Robert Barney

Frances Lam

Joe LeBlanc

Laura Flores

Claire Chambers

John Teevan

Torger Johnson

Alexei Klestoff

Marilyn Palomino

Gloria Roth

Benjamin Ersando

Nicole Kelsey

Judy Hartmann

Daniel Schuessler

paul rivas

Natalie Scott

Karen Chan

Utkarsh Nath

Natalie Kilmer

Courtney Garneau

Mary Bissett

Christopher Miller

Bill Schauman

Christina De Quero

marty keller

John Rizzi

Deane Plaister

Chris Ritter

James Kremer

Patricia McCarthy Kremer

Keegan Hanks

Aimee Wyatt

Roland Roberge

Matthew Leddick

Michael Guzman

Anna Bainter

Joanna Lonerio

Samantha Lee

Larry Kendrick

Morgan B

Danielle Zucchini

MARGARET GERARD

Sallye Steiner Bowyer

William Wong

Claire Lacy

Matthew Walker

Patrick Martin-Schafer

Allegra tachner

whitley smith

Mark Ricci

Mark Hubbell

lawrence lare

Nancy Tierney

Lisa Martinez

Candace Rocha

KATHY SCROGGS

From: [Stan Zeavin](#)
To: [Ringuette, Oceane@Coastal](mailto:Ringuette,Oceane@Coastal); [Rexing, Stephanie@Coastal](mailto:Rexing,Stephanie@Coastal); [KoppmanNorton, Julia@Coastal](mailto:KoppmanNorton,Julia@Coastal)
Subject: my letter
Date: Monday, March 6, 2023 11:19:49 AM

Dear Commissioners,

I STONGLY SUPPORT THE CC STAFF'S CHANGES ON PACIFICA'S LCLUP!

I'd also like to give a well deserved shout out to Stefanie Rexing, Julia Koppmannorton and Oceane Ringuette, the three CC Staff members who have been responsible for controlling Pacifica City Council's continued attempts to subvert the CCC's basic guidelines.

As a 30 year resident of Pacifica who has been an active participant in attempting to deal with the effect both climate change and sea level rise (SLR) will have on our city, I have seen our LCLUP (this process started in 2018 with the help of a CCC grant and a very different city council) morph from a CCC guideline friendly plan to one that the real estate industry would be proud to author. No managed retreat, no feasible alternate plans if their plan A fails, and, although an LCLUP plan's fiscal responsibility is not in the jurisdiction of the CCC, it certainly will have a profound effect on the citizens of Pacifica.

Here is just one of many examples of how our city council uses a not so slick slight of hand to create the LCLUP:

Our current LCP states that no new seawall shall be built to protect new development. However, the Sharp Park pump, along with its western sewer lines, needs to be moved eastward to protect it from SLR. Several years ago, the price was estimated to be around \$40M for the job. Meanwhile, the city decided Pacifica needs a fully armored seawall that will last 50 years to protect the sewer system while it is being moved. They don't mention that with the seawall built, the city believes it can now create significant new development via the Sharp Park Specific Plan in a coastal hazard zone.

At that time the total cost of the seawall was estimated at \$235M. Residents have little to no idea how far along the grant process has progressed. The City of Pacifica has implemented a new sewer rate hike to raise \$40M over a four year timeline for "sewer support". If interest is included, it may push the cost up to around the \$70M mark. The obvious guess is that "sewer support" means the seawall. The city was vague on this point. It appears the citizens of

Pacifica are being asked to pay for a sewer rate hike that could cover the approximate cost it would take to move the Sharp Park pump and sewer system. However that money is probably heading towards supplementing the cost of the seawall.

All Pacificans are being asked to cover the cost of a seawall that would protect, at most, 5% of the population. This portion of the sewer system provides service to 40% of the population.

Furthermore, the cost of delaying the moving of the Sharp Park pump and sewer system into the future could conceivably double or triple the price. Add to that the cost of removing the seawall when it collapses. Add to that the possible grants we could get now for the pump and sewer line move may not be available down the road. By using the “sewer support” investment to actually move the pump/sewer lines now, it would save the city hundreds of millions of dollars and eliminate the need for the seawall.

You can find this kind of thinking throughout the LCLUP.

COMMISSIONERS, REJECT THE CITY OF PACIFICA’S ONGOING ATTEMPT TO HARD ARMOR THE COASTLINE DEFERRING THE INEVITABLE TO FUTURE GENERATIONS. PLEASE SUPPORT AND APPROVE THE MODIFICATIONS TO THE PACIFICA LCLUP PRESENTED BY CCC STAFF.

Thank you,
Stan Zeavin

From: [Summer Lee](#)
To: NorthCentralCoast@Coastal
Subject: Pacifica LCP
Date: Friday, March 3, 2023 9:39:10 PM

Dear Staff and Commissioners:

I understand the hearing on Pacifica's LCP has been delayed.

I still would like to express my strong support of the Coastal Commission staff comments and additions on the LCP draft. I, like many of my neighbors, would support both motions: the rejection of Pacifica's LCP draft, and the adoption of this draft with modifications.

However, I believe the modifications could go further for some of the most sensitive coastal areas in our City. For example there should be stronger language in the rezoning of the Pedro Point field ("Field"), as well as for the rezoning of the Quarry in an upcoming reclamation project FEIR, that falls under the Coastal Commission jurisdiction. These proposed changes to land use designations pose conflicts that are not currently addressed in the staff's proposed modifications.

Specifically, for both the Pedro Point field and quarry, the changes in land use designations are not consistent with the ESHA and CEQA guidelines that require such changes to have proper analysis of environmental conditions.

I am heartened by the rest of the Coastal Commission staff comments that understand the need for planning for future SLR and sensitive ecologies, and with these small additional modifications, I strongly urge you to adopt this draft and give Pacifica a reasonable LCP that we neighbors will fight to uphold.

Sincerely,
Summer Lee
Pacifica Resident for 23 years

From: [Christopher Pederson](#)
To: [NorthCentralCoast@Coastal](#)
Cc: [Huckelbridge, Kate@Coastal](#); [Carl, Dan@Coastal](#); [Rexing, Stephanie@Coastal](#); [julia.koppmannortan@coastal.ca.gov](#); [Ringuette, Oceane@Coastal](#); [Warren, Louise@Coastal](#); [Brownsey, Donne@Coastal](#); [Hart, Caryl@Coastal](#); [Aguirre, Paloma@Coastal](#); [Aminzadeh, Sara@Coastal](#); [Bochco, Dayna@Coastal](#); [Escalante, Linda@Coastal](#); [Harmon, Meagan@Coastal](#); [Rice, Katie@Coastal](#); [Turnbull-Sanders, Effie@Coastal](#); [Uranga, Roberto@Coastal](#); [Wilson, Mike@Coastal](#)
Subject: Public Comment on March 2023 Agenda Item Wednesday 14a - City of Pacifica LCP Amendment Number LCP-2-PAC-20-0036-1 (City of Pacifica LUP Update).
Date: Tuesday, February 28, 2023 11:24:42 AM

Dear Chair Brownsey and Commissioners:

Climate disruption is the greatest environmental challenge of our era, imperiling many, if not all, of the coastal resources that the Coastal Act commands the Commission and local governments to protect. The Commission and local governments must use all the tools their disposal to minimize the greenhouse gas emissions that drive climate disruption.

According to the California Air Resources Board (CARB), transportation is by far the single largest source of carbon pollution in the state, accounting for half of the state's greenhouse gas emissions. (CARB, 2022 Scoping Plan for Achieving Carbon Neutrality, p.184 <https://ww2.arb.ca.gov/sites/default/files/2022-12/2022-sp.pdf>) Numerous approaches will be necessary for reducing carbon pollution, but reducing vehicle miles traveled (VMT) is indispensable for achieving the state's climate goals. (2022 Scoping Plan, p. 192, Appendix E (Sustainable and Equitable Communities), pp. 4-6 <https://ww2.arb.ca.gov/sites/default/files/2022-11/2022-sp-appendix-e-sustainable-and-equitable-communities.pdf>.)

One of the strategic objectives for achieving VMT reductions falls squarely within the Commission's and the City of Pacifica's local coastal program obligations: to "[e]ncourage future housing production and multi-use development in infill locations and other areas in ways that make future trip origins and destinations closer together and create more viable environments for transit, walking, and biking." (2022 Scoping Plan, pp. 193-94.) So too is one of the core strategies for achieving that objective: "[a]ccelerat[ing] infill development and housing production at all affordability levels, with a focus on housing for lower-income residents." (2022 Scoping Plan, p. 195.)

The Coastal Act provides the Commission and local governments with the authority necessary to help the state accomplish its objectives and strategies for reducing VMT and carbon pollution. Chapter Three of the Coastal Act requires new development to:

- minimize energy consumption and vehicle miles traveled (Section 30253(d),
- be concentrated within or in close proximity to already developed areas (Section 30250(a)),
- to facilitate transit service (Section 30252(1)),
- to locate commercial and residential uses in close proximity in order to limit driving (Section 30252(2)),
- to provide for non-automobile circulation (Section 30252(3)), and
- to assure the potential for public transit for high-intensity uses (Section 30252(5)).

It further allows the provision of public transit to substitute for parking requirements. (Section 30252(4)). Finally, the Coastal Act requires the Commission to encourage housing opportunities for low- and moderate-income persons and to allow density bonuses for

development that includes affordable housing unless the density cannot be accommodated in conformity with Chapter Three or the applicable LCP. (Section 30604(f).)

These Coastal Act requirements are precisely the kinds of actions that the Air Resources Board urges public agencies to take in order to reduce VMT. (See 2022 Scoping Plan Appendix D (Local Actions), pp. 11-12 (Table 1), pp. 22-23 (Table 3) <https://ww2.arb.ca.gov/sites/default/files/2022-11/2022-sp-appendix-d-local-actions.pdf> and Appendix E, pp. 22-28.)

Unfortunately, Pacifica's proposed updated Land Use Plan falls short of these minimum Coastal Act requirements. To address these basic gaps in the City's submittal, the Commission should adopt the following suggested modifications (modifications to the City's proposed language shown in underlining and strikeout):

1) Policy LD-I-2: **Land Divisions in the Coastal Zone.** Continue to require coastal development permits for all land divisions within the Coastal Zone. Land divisions in the Coastal Zone shall be:

- Designed to minimize impacts to public access, recreation, and other coastal resources.
 - Designed to minimize site disturbance, landform alteration, and the removal of native vegetation for development or fire safety.
 - Designed to minimize energy consumption and vehicle miles traveled and to promote modes of transportation other than the automobile.
 - Prohibited on properties that include any areas that are within or adjacent to an Environmentally Sensitive Habitat Area (ESHA) unless the resulting parcels are set aside for conservation, or unless the resulting parcels can be developed consistent with policies protecting sensitive habitats including but not limited to a prohibition on building or requiring vegetation clearance in the ESHA or ESHA buffer.
 - Prohibited on properties that are within Coastal Vulnerability Zones, unless the resulting parcels are set aside for conservation, or unless the resulting parcels can be developed consistent with the LCP. [staff recommended suggested modification]
 - Permitted only in areas with adequate public services to serve development on the resulting parcels.
- Any land division that would result in a parcel that could not be developed in accordance with the policies of this LCLUP is not allowed.

Explanation: the design of a subdivision can be crucial to whether modes of transportation other than the automobile are feasible. To comply with Sections 30252 and 30253, the LUP policy governing the review of land divisions should require evaluation of whether a proposed subdivision is designed to facilitate or impede walking, biking, and transit.

2) Policy LD-G-2: **Concentrated Development.** Focus new development in or directly adjacent to already-developed areas, where it can be served by existing public services and where it will not have significant impacts on coastal or other resources. Allow small-scale multifamily housing in all residential zones.

Explanation: Neighborhoods that consist solely of single-family residences generally do not have the density necessary to support convenient public transit service. Allowing small-scale multifamily housing in currently low-density residential areas can facilitate transit service,

serves to concentrate development in already developed areas, and can provide more opportunities for lower-cost and more energy efficient multifamily housing. Moving away from single-family residential zoning also advances the Coastal Act's environmental justice provisions because single-family zoning was historically an important tool in enforcing racial segregation and exclusion and establishing automobile-dependent land use patterns. (See 2022 Scoping Plan Appendix E, pp. 3-4, 6-8, 22-23; *Village of Euclid v. Ambler Realty Co.* (1926) 272 U.S. 365, 394-95 (segregation-era Supreme Court decision characterizing apartment buildings in single-family neighborhoods as parasites and nuisances).)

3) New policy LD-I-8.5: **Affordable Housing.** Allow additional density, incentives and concessions to eligible housing development pursuant to the Density Bonus Statute (Government Code section 65915) unless they cannot feasibly be accommodated on site in a manner that is in conformity with Chapter 3 of the Coastal Act. Allow accessory dwelling units that comply with the standards specified in Government Code section 65852.2, unless the proposed accessory dwelling unit cannot feasibly be accommodated on site in a manner that is in conformity with Chapter 3 of the Coastal Act.

Explanation: Coastal Act Section 30604(f) requires the Commission and local governments to approve additional density for projects that include affordable housing pursuant to the state's Density Bonus statute, except where that density cannot feasibly be accommodated in conformity with Chapter 3 or the applicable certified LCP. This modification would clarify that if a proposed density bonus is consistent with all Chapter 3 policies, then it should be approved even if it might require exceptions to LCP standards that exceed minimum Chapter 3 requirements. An example could be exceptions to setback, height, or parking requirements for an apartment building proposed in a location where coastal hazards, coastal views, or public access are not at issue. This modification would similarly clarify that accessory dwelling units should be allowed in conformity with state law except on sites where doing so would be inconsistent with Chapter 3.

4) Policy PR-G-4: **Transportation and Vehicle Miles Traveled.** The location and amount of new development should maintain and enhance public access to the coast by (1) facilitating the provision or extension of transit service, (2) providing commercial facilities within or adjoining residential development or in other areas that will minimize the use of coastal access roads, (3) providing nonautomobile circulation within the development, (4) providing adequate parking facilities or providing substitute means of serving the development with public transportation, (5) assuring the potential for public transit for high intensity uses, and by (6) assuring that the recreational needs of new residents will not overload nearby coastal recreation areas by correlating the amount of development with local park acquisition and development plans with the provision of onsite recreational facilities to serve the new development.

City shall strive to implement infrastructure and programs which support a significant reduction in vehicle miles traveled (VMT). New development shall minimize energy consumption and VMT.

Explanation: The updated LUP does not include the relevant language of Coastal Act sections 30252 and 30253 (except as relegated to an appendix). This modification would correct that.

5) Policy PR-G-26: **Private Parking.** Ensure adequate off-street parking in all new development, except where substitute means of serving the new development with public transportation are provided. The determination and regulation of any required off-street parking shall take into account the effects of parking supply on energy consumption and VMT. Allow exceptions to off-street parking requirements for low- and moderate-income housing.

Explanation: Coastal Act section 30252 expressly provides that new development is not required to provide off-street parking where substitute means of serving the development with public transit are provided. The City's proposed language, by not allowing that exception, is inconsistent with Chapter Three. In addition, lower-income households typically have lower vehicle ownership rates than more affluent households. Allowing less off-street parking for less expensive housing still complies with Section 30252's provision regarding "adequate" off-street parking and also responds to the Coastal Act's requirement to encourage low- and moderate-income housing. The Air Resources Board calls for the reduction or elimination of minimum off-street parking requirements as a strategy for reducing VMT. (See 2022 Scoping Plan, Appendix D, pp. 11, 22-23; Appendix E, pp. 27-28.)

Adoption of these suggested modifications would bring the updated LUP into conformity with Chapter Three's policies regarding transportation and the concentration of development and promote environmental justice. It would also advance the Commission's and Pacifica's efforts to reduce greenhouse gas emissions and the threat climate disruption poses to coastal resources.

Thank you for your consideration of my comments.

Sincerely,

Christopher Pederson

From: [James Kremer](#)
To: Ringuette, Oceane@Coastal
Cc: KoppmanNorton, Julia@Coastal
Subject: RE: Pacifica Item W14a, hearing delayed
Date: Friday, March 3, 2023 2:52:05 PM

Oceane,

I read all the changes recommended by CCC Staff to the Pacifica Draft LCLUP.

I really appreciate CCC Staff's clear attention to being as clear as possible about intent and policies. This care was apparent in the many cases where additions were paired with deletions of City's text which would have overtly put the city in positions inconsistent with the CCA and CCC staff guidance over the last years. I strongly support the suggested modifications, and applaud the CCC Staff's persistence in dealing with the city's recalcitrance in a protracted dialog.

I want to comment on two places where deletions are suggested, but where their specific history in the Vulnerability study may argue against the modification. I feel qualified to offer these comments because I was invited and served on the 2018 Pacifica "[Sea Level Rise Community Working Group](#)." I observed the discussions of the SLR adaptation plans, and the cost-benefit study. Both were strongly contested. I think some history may justify changes to the CCC modifications here.

I am not sure how this may be accomplished prior to or in the ~~March 8~~ CCC meeting. I suspect the City may engage CCC Staff in discussions related to any number of specific suggested modifications. Again, I urge you to hold the line – my city has not shown good faith in prior years' dialog. I hope that my 2 points are places where concessions could be made, with mutual benefit if further discussions take place. *[I see just now that the full CCC meeting has been postponed. I hope there is a productive dialog.]*

1. Objective triggers for SLR adaptations. Early drafts of adaptation plans (in the Vuln. Assmnt) used a timetable for proposed adaptive responses (e.g. in 25 yrs, do this; in 50 yrs. do this). Subsequent creative deliberations achieved a compromise using observable triggers (e.g. specific levels of SLR or erosion). It was a major change. I felt this shift overcame the strong unified objections of climate skeptics and dogmatic opponents of managed retreat. The resulting plan details seemed to blunt the objections, and bought acceptance of the important and detailed steps of future adaptive response.

Further, and importantly, the use of observable triggers rather than a temporal schedule necessitated the monitoring plan, which remains in the DLCLUP (policy CR-I-3, p. 168 of Exhibit 2). This revision passed the outgoing Council, I think largely because of this.

I strongly endorse the wording changes, deletions and additions, proposed by Staff in this area of the LCLUP, specifically sec. 6.6. However I feel that keeping the concept of observable triggers has important advantages, as well as being a successful product of the early drafters, when the city officials at that time leaned toward prudent, conservative adaptive policies for Pacifica's coastal zone.

Triggers are specifically mentioned in 2nd ¶ of sec. 6.6, and many following sub-area policies. When a policy is completely deleted, of course the specified trigger is invalid (e.g. CR-I-20 & -21, p 175), but when a policy survives as modified (e.g. CR-I-22), the trigger may have merit.

Q: Are such specific triggers against the CCC guidance and the intent of the CCA? If not, I encourage these sections to be revisited, retaining much or all of the wording modifications,

but leaving the objective and scientific guidance *vis á vis* the observable monitoring results. Retaining the monitoring program is predicated on some rational use of the results, and this would provide that tight linkage. It is likely that the specific triggers should be revised using acceptable science and monitoring at some interval, e.g. every decade. This could be added.

2. That cost-benefit study (*Adaptation Plan*. Exhb. 2 file p 164 ff). I have some background in coastal policy and economic analyses like this, and I spoke in detail with the author of the C/B section of the Report at the public meeting when it was presented to the CWG I was serving on. This too raised near-violent objections in these public meetings. What you should know is that the economic part of the consulting project was done on “a shoestring” and the author readily admitted this. He offered caveats that backed off from the quantitative precision of his findings. However, he defended his work as a valid scaling of relative costs and benefits for the considered alternatives. Such a ranking is of genuine value, and it was mostly in this vein I believe, NOT as a precise quantitative accounting, that the work was included in the report. Taken in that light, the C/B study was valuable, but misunderstood.

I worry that the suggested modifications to delete all of the City’s references to the City refusing to use the C/B in any way might have unintended consequences. It would be unfortunate indeed if these deletions allowed the specific quantitative values of the C/B to be used as is at a future time! Total omission potentially seems to risk this. The wording should be changed so that the shortcomings are considered, and any use of the C/B be only used for approximating relative costs of adaptive response options. This is a dilemma, but as presently stated, you remove any suggestion of the valid shortcomings explained by the author that should inform any future use of that section of the report. Yet, the original City wording is also fraught. Their total denial is clearly an overreaction, as I see as CCC Staff’s intent in the complete deletions.

I know these detailed comments may or may not be helpful.

My reaction to almost all the CCC Staff modifications is strong support. I have read the Staff responses in the protracted negotiations exposed in the numerous “Filing Documents” with the city over the years. I and many others are disturbed by the City’s resistance to the guidance and the legal constraints. Many positions are not well defended, not supported by policy or scientific evidence. They mostly arise solely from a hopeful claim of regulatory overreach. I do not believe this has the support of many Pacifica citizens.

-- Jim

James Kremer, Ph. D.
Resident of Sharp Park since 2008
Retired Professor of Marine Science, emeritus (USC and UCONN)

From: [Amy Pritchard](#)
To: NorthCentralCoast@Coastal
Subject: RE: March 8th CCC Meeting - Agenda Item 14: Local Coastal Programs (LCPs); City of Pacifica Local Coastal Program Amendment Number LCP-2- PAC-20-0036-1 (City of Pacifica LUP Update)
Date: Thursday, March 2, 2023 6:32:58 PM

Dear Commissioners,

I'm writing to comment on the City of Pacifica's proposed update of its Local Coastal Program (LCP) and Land Use Plan (LUP) - Program Amendment Number **LCP-2- PAC-20-0036-1**.

I have read the Summary of Staff Recommendations, and support the staff's suggested modifications, but additional refinements are needed before you vote to approve this LCP/LUP.

Some of the proposed changes to land use designations pose conflicts that are not currently addressed in the staff's proposed modifications. In particular are the ESHA conflicts related to the undeveloped site west of the Pedro Point shopping center (also known as the Pedro Point field on San Pedro Ave.)

My neighbor, Joanne Gold, has already submitted details about ESHA and habitat-for-species-of-special-interest conflicts in an email sent to Commissioners on March 2nd, including:

The presence of California Red Legged Frogs (CLRF) in the freshwater swale adjacent to the Pedro Point field - a species of special concern that requires specific protections.

The swale itself, which has been determined as ESHA due the wildlife and plant species that exist there and have previously been documented by the Coastal Commission.

The proposed CRMU land use designation, which conflicts with ESHA and CEQA guidelines that require changes in designation and zoning to consider the current state of the field as the environmental baseline.

Local citizens like myself have been providing the City of Pacifica with scientific data and neighborhood feedback related to this sensitive undeveloped parcel for many years only to be ignored. I strongly urge you to defer voting on this amendment on March 8th, and consider adding further required modifications to ensure that Pacifica has a functional, responsible LCP/LUP that protects and enhances our coastal environment.

Amy Pritchard, Pedro Point resident for 11yrs.

312 Kent Road

From: [Stan Zeavin](#)
To: [Ringuette, Oceane@Coastal](mailto:Ringuette_Oceane@Coastal); [KoppmanNorton, Julia@Coastal](mailto:KoppmanNorton_Julia@Coastal); [Rexing, Stephanie@Coastal](mailto:Rexing_Stephanie@Coastal)
Subject: W14A, LCP Amendment Number LCP-2-PAC-20-0036-1
Date: Friday, March 3, 2023 3:22:01 PM

Honorable Kate Huckelbridge
California Coastal Commission
455 Market Street, Suite 300
San Francisco, CA 94105

3 March, 2023

Subject: Pacifica LUP Update

Dear Director Huckelbridge, Honorable Commissioners and Staff,

I fully support the corrections made by CC staff to the Pacifica LCLUP and presented to you today.

With our entire coast vulnerable to SLR, our Pacifica City Council and Staff have chosen to ignore the long-term reality and financial viability in favor of short term armoring.

Since our City Council eviscerated our LCLUP in 2018-19 and proclaimed their version “certified” they have proceeded with both armoring and new development that will need future protection.

The City continues to seek public resources to protect private investment. This is without acknowledging the real need to plan for the inevitable retreat that will be necessary if Pacifica is to survive.

For example, requiring a consultant to equate managed retreat to “no project” badly skewed perception in Sharp Park. Yet, eventually moving the sewer pump station will be necessary.

Manipulating zoning changes and specific plans for separate areas of the city have forced citizens to focus hyper-locally and casts citizen concerns as NIMBYism.

In truth, if the cavalier solution is always “Raise the Wall!” Pacifica will eventually be bankrupt.

Your dedicated staff has worked patiently for five years to align our LCLUP with State policy. Pacifica has chosen to ignore and obfuscate as our staff continues to grant permits faster than public watchers can respond.

Please accept your staff’s proposed amendments and add what Pacificans are requesting for Pedro Point, Aramai Point and the Quarry.

With thanks to you and your staff,

Sincerely,

Margaret Loring Goodale
Pacifica

From: [Heba Ismail](#)
To: NorthCentralCoast@Coastal
Subject: : March 8th CCC Meeting - Agenda Item 14: Local Coastal Programs (LCPs); City of Pacifica Local Coastal Program Amendment Number LCP-2- PAC-20-0036-1 (City of Pacifica LUP Update)
Date: Thursday, March 2, 2023 7:59:42 PM

Dear Commissioners,

I'm writing to comment on the City of Pacifica's proposed update of its Local Coastal Program (LCP) and Land Use Plan (LUP) - Program Amendment Number **LCP-2- PAC-20-0036-1**.

I have read the Summary of Staff Recommendations, and support the staff's suggested modifications, but additional refinements are needed before you vote to approve this LCP/LUP.

Some of the proposed changes to land use designations pose conflicts that are not currently addressed in the staff's proposed modifications. In particular are the ESHA conflicts related to the undeveloped site west of the Pedro Point shopping center (also known as the Pedro Point field on San Pedro Ave.)

My neighbor, Joanne Gold, has already submitted details about ESHA and habitat-for-species-of-special-interest conflicts in an email sent to Commissioners on March 2nd, including:

- The presence of California Red Legged Frogs (CLRF) in the freshwater swale adjacent to the Pedro Point field - a species of special concern that requires specific protections
- The swale itself, which has been determined as ESHA due to the wildlife and plant species that exist there and have previously been documented by the Coastal Commission
- The proposed CRMU land use designation, which conflicts with ESHA and CEQA guidelines that require changes in designation and zoning to consider the current state of the field as the environmental baseline.

Local citizens like myself have been providing the City of Pacifica with scientific data and neighborhood feedback related to this sensitive undeveloped parcel for many years only to be ignored. **I strongly urge you to defer voting on this amendment on March 8th, and consider adding further required modifications** to ensure that Pacifica has a functional, responsible LCP/LUP that protects and enhances our coastal environment.

Sincerely,
Heba Ismail

From: [Robine Runneals](#)
To: NorthCentralCoast@Coastal
Cc: ["pacfam5r@pacbell.net"](mailto:pacfam5r@pacbell.net)
Subject: 14A Public Comment on March 2023 Agenda Item Wednesday 14a - City of Pacifica LCP Amendment Number LCP-2-PAC-20-0036-1 (City of Pacifica LUP Update).
Date: Friday, March 3, 2023 4:59:37 PM

Dear Coastal Commission Commissioners,

I wish to express on behalf of my family living in Sharp Park our support for the Pacifica's LCP & LUP draft submitted to you. Our family has lived here for four generations. We love and respect this area and consider being good stewards of Sharp Park beach our responsibility. We wish to continue being a family in this Sharp Park neighborhood. Our Grandchildren go to school here.

We live a block and a half from the Beach Boulevard Promenade. A street that was elevated into a wall to stop winter storm surge damage to the street that started back in the 60's & 70's. That stretch of road has been protecting us since built in the late 1970's. And the Sharp Park Beach, a long and deep beach, has co-existed with the Promenade for over 40 years. The presence of the promenade has not diminished the Sharp Park beach at all. Please contact me and I'll take you on a tour of this area.

Our homes are in the Brighton Beach subdivision and desperately need Beach Boulevard's promenade to be improved and to continue to protect our home from predicted Sea Level rise. Also the homes of our neighbors, businesses, City Hall, IBL Middle School and Pacifica Resources Center that serves the unhoused and needs of so many here.

Please do not Manage Retreat our neighborhoods and our futures by denying our proposed LCP & LUP. The plan before you was years in the making with much public comment and represents the vision and desires of the people of Pacifica. To deny us this use and protection denies thousands of lives here a future. Please give Pacifica an opportunity to prove to you we are good stewards in the futrues.

Thank you,
Robine Runneals & Family
Sharp Park

Hal Bohner
736 Keller Court
Petaluma, CA 94952
Hbohner100@gmail.com
650-784-1418

March 3, 2023

To: California Coastal Commission – Commissioners, all alternates for Commissioners, the three non-voting members of the Commission, and Commission staff.

Re: Hearing March 8, 2023, Item 14a - City of Pacifica proposed Local Coastal Program
Amendment Number LCP-2- PAC-20-0036-1.

Dear Commissioners et al.

I am a California resident and formerly a resident of Pacifica for about 30 years. My request to you today is simple - I urge that the Commission not approve Pacifica's proposed amendment and instead support the staff and its report.

There is a fundamental issue that permeates this agenda item. Namely – whether to allow further armoring of the California coast or not to allow armoring. We have seen the Commission address this issue before. I vividly recall that in one debate on armoring a Commissioner stated, "Coastal armoring should be anathema to this Commission." I almost stood and cheered!

Unfortunately, the debate goes on but it is a debate that should have been settled long ago. Coastal armoring is essentially prohibited by the Coastal Act, both its letter and its spirit. Limiting or prohibiting future armoring and removing existing armoring was a basic promise of the Coastal Act when it was enacted by the California voters in 1972 and later adopted by the California Legislature.

I urge the Commission to do the right thing and not approve Pacifica's proposed amendment.

Thank you for helping to preserve the California coast,

Sincerely,

Hal Bohner

Anthony A. Ciani, Architect 220 Walnut Street, Pacific Grove, California 93950

March 2, 2023

W14a

California Coastal Commission
c/o Ms. Stephanie Rexing
North Central Coast District Manager
455 Market Street, Suite 300
San Francisco, CA 94105

Via Email: Donne.Brownsey@coastal.ca.gov
Stephanie.Rexing@coastal.ca.gov

**RE: City of Pacifica Local Coastal Program Amendment Number LCP-2- PAC-20-0036-1
(City of Pacifica LUP Update)**

Dear Chair, Brownsey, and Members of the Coastal Commission:

The proposed amendment to the City of Pacifica LCP Land Use Plan regarding Sea Level Rise could set a negative precedent for how to manage coastal erosion and sea level rise for cities, counties, and the state with similar circumstances in California.

Please deny the amendment and recommend the Pacifica modify the Land Use Plan Policies to prioritize protection and restoration of the natural coastal resources for future generations, and plan now, to relocate its development and infrastructure to safe areas, out of harms way.

Sincerely,

Anthony A. Ciani

From: [Andrew Meiman](#)
To: [NorthCentralCoast@Coastal](#)
Cc: [Margo Meiman](#); [Joanne Gold](#)
Subject: Comment on City of Pacifica Local Coastal Program Amendment LCP-2- PAC-20-0036-1 (City of Pacifica LUP Update)
Date: Friday, March 3, 2023 4:17:51 PM

Commissioners -

We sincerely appreciate Coastal Commission staff efforts and involvement over the past several years assisting Pacifica in developing our LCP. We agree that modifications are needed in order to approve the plan and we implore the Commission to significantly strengthen the suggested modification language to further detail the changes required, particularly concerning the Pedro Point field on San Pedro Avenue. A comprehensive and compliant plan cannot leave ambiguity about what is required in order to be acceptable. The currently suggested modification language fails this test. Clarity and specificity is needed to arm the City with the ability to enforce the Plan in coming years as development pressure will inevitably lead to reinterpretation of the soft suggested language only that "*... all biological constraints are considered.*"

Additionally, we support the other points made by Joanne Gold in her March 3 letter and also request that the Commission take more time to develop strong and clear modification language, prior to plan approval.

Sincerely,
Andrew and Margo Meiman
Pacifica

TO: NorthCentralCoast@coastal.ca.gov

RE: **March 8th CCC Meeting - Agenda Item 14:** Local Coastal Programs (LCPs); City of Pacifica Local Coastal Program Amendment Number **LCP-2- PAC-20-0036-1** (City of Pacifica LUP Update)

DATE: March 3, 2023

Dear Commissioners,

I'm writing to comment on the City of Pacifica's proposed update of its Local Coastal Program (LCP) and Land Use Plan (LUP) - Program Amendment Number **LCP-2- PAC-20-0036-1**.

I have read the Summary of Staff Recommendations, and while I support the staff's efforts to work with the City of Pacifica and agree with their suggested modifications to ensure Coastal Act consistency, I feel additional refinements are needed before you should vote to approve this LCP/LUP.

As you will hear from a number of other Pacifica citizens whom I understand will be commenting on this LCP update, some of the proposed changes to land use designations in the LUP Update contain serious ESHA (Environmentally Sensitive Habitat Area) and habitat-for-species-of-special-interest conflicts that are not currently addressed in the staff's proposed modifications.

In particular, I want to bring to your attention ESHA conflicts related to the undeveloped site west of the Pedro Point shopping center (also known as the **Pedro Point field** on San Pedro Ave.)

Although the summary of staff recommendations correctly notes the proposed LUP provisions are "*not consistent with the Coastal Act, as it relates to coastal hazards and Sea level rise conditions along the coastline*" (p. 2), staff goes on to state that "*Beyond the coastal hazard concerns, the proposed LUP mostly provides for appropriate updated provisions affecting coastal resources in the City, and should be able to effectively govern proposed coastal zone development moving forward, with some caveats.*" [p. 3 paragraph 2]. **On this point, I strongly disagree.** The City of Pacifica has a long and well documented history of catering to the special interests of developers & realtors at the expense of basic, common sense environmental protections that would benefit the whole community and have not demonstrated an ability to self-govern effectively when it comes to protecting coastal resources.

In the case of the Pedro Point field, the caveat noted by staff is a proposed modification to Policy LD-I-20 "*to ensure that all biological constraints are considered for this site prior to any future development allowances*" (P. 17, paragraph 2). **This modification does not go far enough and does not take into consideration the known ESHA conflicts and species-of-special-concern that exist within this parcel.**

California Red Legged Frogs (CLRF) have long occupied the freshwater marsh swale adjacent to the Pedro Point field and is a species of special concern that requires certain protections; Dr. Peter Baye, Coastal Ecologist, reported their presence to the U.S. Fish and Wildlife Service-Sacramento Fish and Wildlife Office, Endangered Species Program in 2005. Since that time, CLRF have consistently been documented foraging and breeding in the swale, even as recently as the spring/summer of 2022 (See photos-Exhibit A). There is strong scientific evidence that adult CLRF Red-legged frogs travel hundreds of feet away from wetlands at night to feed and then and retreat to underground moist refuges by day (ie: the freshwater swale) - behavior that has been scientifically researched and published for over 20 years. The Pedro Point field adjacent to this swale is the only feeding habitat available for the CLRF and is critical to their survival – on the other side of the swale is a non-habitat parking lot and commercial shopping center development. **Additional modifications to the LUP must be conditionally recommended to address this basic protected species conflict.**

Additionally, the swale - which is characterized by the Coastal Commission Staff as the “unnamed waterway” - has been determined as ESHA due the fauna and flora that exists there. Both the CLRF and the ESHA require buffer zones along with restrictions of adding additional runoff into this waterway which development would undoubtedly cause. **Note that these issues have previously been documented by the Coastal Commission** and by Dr. Lauren Garske-Garcia, Senior Ecologist at the California Coastal Commission in its denial of an adjacent CDP application at 505 San Pedro Ave (CDP application 2-19-0026 hearing on 3/12/21 - **see exhibit C**)

Another ESHA conflict related to the Pedro Point field is the Staff’s assessment that the City of Pacifica’s proposed land use designation of Coastal Residential Mixed-Use for this parcel (which would allow up to 15 units per gross acre and 0.10 Floor Area Ratio (FAR) for nonresidential use) is *“not drastically different from its current commercial land use designation”* (p. 17 , paragraph 2). **But Land Use decisions must be based on the current state and environmental conditions.** The current state of the field today - and since long before the last 1980 LUP/LCP - is;

- an undeveloped open space
- A CRLF feeding and movement habitat
- a season wetland habitat
- a floodplain for run off from the surrounding area
- an access point to Linda Mar beach

With this as the current and long-standing Environmental Baseline, the actual closest land use designation of the Pedro Point Field would be **Conservation (C)**... followed closely by **Low Intensity Visitor-Serving Commercial (LIVC)**. Any other land use at this baseline would not only be in conflict with ESHA but also in conflict with CEQA guidelines that require changes to land use designation and zoning to consider the current on the ground baseline. And the proposed CRMU designation would additionally exacerbate known flooding hazards that are already increasing due to climate change and SLR conditions. (**see exhibit B – Flood photos**)

While I do want to thank your staff for doing a very fine job in assessing the City of Pacifica’s Local Coastal Program Amendment, I strongly believe additional modifications are needed - I’ve cited just a few examples of a basic ESHA conflicts, but I know other Pacifica residents will point out additional concerns. Local citizens have been providing the City with scientific data and neighborhood feedback for many years only to be ignored. (This was noted by CC Staff who commented *“such modifications should not appear to be unfamiliar to the City as they are the same types of changes that staff has been suggesting to the City for many years”* – page 45).

Knowing that the Commission has until December 22, 2023 to take a final action on this LCP amendment, I **would like to strongly urge you to defer voting on this amendment on March 8th. Instead, please take more time to consider adding further conditional modifications**, and ensure that Pacifica has a functional, responsible LCP/LUP. It’s close... but just not there yet.

Sincerely,
Joanne Gold, Pacifica Resident for 23 years
Vice President, Pedro Point Community Association
joannegold@yahoo.com | c: 650-270-8574

Exhibit A

CLRF in the freshwater marsh swale adjacent to the Pedro Point field



CLRF –May 2022



Tadpoles - August 2021



CLRF - August 2021

EXHIBIT B

Pedro Point Field Existing Flooding Condition Hazards



Oct. 2021



Oct. 2021

Linda Mar
State Beach
access point
to beach



Dec. 2022



Dec. 2022 - San Pedro Rd. Flooding in front of field

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



F13a

2-19-0026 (RHODES MIXED-USE DEVELOPMENT)

FEBRUARY 12, 2021

EXHIBITS

Table of Contents

EXHIBITS

Exhibit 1 – Location Map

Exhibit 2 – Site Photos

Exhibit 3 – City-Approved Project Plans

Exhibit 4 – City of Pacifica Final Local Action Notice

Exhibit 5 – Wetland Delineation

Exhibit 6 – Coastal Commission comment letters to City

Exhibit 7 – Peter Baye Biology Memo dated May 4, 2005

Exhibit 8 – Peter Baye Biology Memo dated July 7, 2014

Exhibit 9 – Photographic Documentation of CRLF

Exhibit 10 – CNDDDB Field Survey Report

Exhibit 11 – Commission Staff Ecologist memo

CALIFORNIA COASTAL COMMISSION

455 MARKET STREET, SUITE 300
SAN FRANCISCO, CA 94105
VOICE (415) 904-5200
FAX (415) 904-5400
WWW.COASTAL.CA.GOV



MEMORANDUM

FROM: Lauren Garske-Garcia, Ph.D. – Senior Ecologist

TO: Julia Koppman Norton – North Central Coast District Analyst
Jeannine Manna – North Central Coast District Manager
Dan Carl – North Central Coast District Deputy Director
Jessica Reed – North Central Coast Legal Counsel

SUBJECT: 505 San Pedro, Pacifica (APN 023-72-010): Ecological Resources

DATE: January 25, 2021

Documents Reviewed:

- California Natural Diversity Database (CNDDDB), latest query: January 10, 2021.
- Coast Ridge Ecology. Biological Resources Assessment for APN 023-72-010. Prepared for Shawn Rhodes/NorCal Surf Shop, Pacifica, California 94044; March 2015.
- Coast Ridge Ecology. 505 San Pedro Avenue, Pacifica Wetland Delineation. Prepared for Shawn Rhodes/NorCal Surf Shop, Pacifica, California 94044; November 2019.
- Coast Ridge Ecology. Letter to Shawn Rhodes RE: Observed Change of Flow Conditions of Drainage Channel Adjacent to the Pedro Point Shopping Area and the Proposed NorCal Surf Shop Mixed-Use Development Project, San Mateo County, California. CDP Application 2-19-0026; June 13, 2020.
- Live Oak Associates, Inc. Letter to Nick Pappani RE: Biological Resources Assessment Peer Review for the Shawn Rhodes/NorCal Surf Shop project, located in the City of Pacifica, San Mateo County, California (PN 2110-01); January 19, 2017.
- Thomas Reid Associates. 2005a. Biological Assessment Report. APN (023-72-10) Pacifica, CA 94044. For Compliance with San Mateo County Local Coastal Program Policies. Prepared for Rick D Lee and Richard Lee. August 2005.
- Thomas Reid Associates. 2005b. Site Assessment for California Red-Legged Frog. APN (023-72-10) Pacifica, CA 94044. For US Fish and Wildlife Service, Sacramento Field Office. Prepared for Rick D Lee and Richard Lee. August 2005.

- Wood Biological Consulting. One-Parameter Wetland Delineation for the Proposed NorCal Surf Shop Mixed-Use Development, San Mateo County, California (CDP Application 2-19-0026). Prepared for Shawn Rhodes, 5460 Pacific Coast Highway, Pacifica, CA 94044; May 14, 2019.

The North Central Coast District has requested a technical analysis of the ecological resources that could be adversely impacted by proposed development at 505 San Pedro Avenue in Pacifica, California (APN 023-72-010). The project would almost entirely cover the approximately 600-ft long by less than 60 ft-wide parcel with several buildings, a skate park, parking, and pedestrian pathways. The parcel is bounded by Halling Way and a strip mall to the east, San Pedro Avenue to the south, a drainage and an open field to the west, and to the north, a footpath leading to the southern reach of Pacifica State Beach (**Figure 1**). The adjacent drainage intermittently conveys water, including from westward San Pedro Avenue to a culvert at the northern end of the subject parcel, which connects to the mouth of San Pedro Creek on the opposite side of a shopping center parking lot, approximately 270 feet to the east. Importantly, the parcel is divided between jurisdictions, with approximately one third nearest the sea occurring within the Commission's retained jurisdiction and the remainder nearest San Pedro Avenue within the City's jurisdiction – the applicant did not elect to pursue a consolidated permit and the City approved a permit for the portion of the project in its jurisdiction in 2018. The following analysis addresses the Coastal Development Permit (CDP) application submitted to the Commission and my **conclusion is summarized on page 12**.

History

Since May 2010, when the applicant preliminarily sought consultation with Commission staff, staff has consistently identified concerns regarding wetlands and other biological resources both on and adjacent to the project site. In a letter dated May 8, 2015 to the City of Pacifica concerning review coordination for the proposed project, staff cited a 2005 biological report that characterized the drainage as an intermittent stream, that California red-legged frogs (CRLF) were likely present and breeding in the area surrounding the property, and that the drainage likely served as a dispersal corridor from nearby San Pedro Creek. In the 2015 letter, staff concluded that the proposed project would not conform to Local Coastal Plan (LCP) policies protecting sensitive habitats. In May 2018, staff commented on the project's Initial Study/Minimum Negative Declaration (IS/MND)¹ and again reiterated concern for both wetlands and sensitive species that may be affected, specifically citing concern for CRLF use of the drainage as a corridor and its movement across adjacent areas including the subject parcel. The City's response largely dismissed these concerns² and since that time, staff has continued to reiterate them to the applicant.

Following review of several submitted documents, initial desktop research, and having made an informal roadside visit to the site in March 2019, I and several District staff met with the applicant and their representatives on-site on October 3, 2019. During this visit, ecological concerns were again discussed at length.

¹ Email from Patrick Foster, Coastal Commission Analyst, to Christian Murdock, Senior Planner at City of Pacifica RE: 505 San Pedro CEQA Document. May 1, 2018.

² City of Pacifica. 2018. Response to Comments: 505 San Pedro Avenue Project Initial Study/Mitigated Negative Declaration, Public Review Draft – Agency Comments. June 2018.

Wetlands

The 2005 biological report referenced in the Commission staff 2015 letter regarded the drainage adjacent to the subject parcel as an intermittent stream and the California Aquatic Resources Inventory (CARI) maps it as part of a natural fluvial drainage sourcing from across San Pedro Avenue and the forested area behind existing development (**Figure 2**). The drainage receives flows from the Pedro Point neighborhood, which primarily enter through a culvert directly east of the subject parcel and flow northward until meeting San Pedro Creek. A scour pool has formed at the mouth of the culvert, next to the roadside, and water generally ponds for some distance thereafter, even well after seasonal flows cease (**Figure 3**). During larger flows, surface water continues along the full length of the drainage paralleling the subject parcel and exits through a culvert largely obscured by the willow thickets at its north end, which daylights within a restoration area on City land for a short distance, enters another culvert, and then flows into San Pedro Creek on the other side of the San Pedro Shopping Center. Aerial imagery shows that throughout the year, the drainage remains largely green with vegetation even when surrounding areas dry out (**Figure 4**).

Despite suggestions that the drainage be characterized as a stream, I believe it is more accurately treated as wetlands for several reasons. First, while there may be intermittent seasonal surface flows along the length of the drainage between San Pedro Avenue and the northern willow thickets, the scour pool near San Pedro Ave appears to remain a largely wetted feature year-round, while mid-way ponding and flow beyond this is more seasonal, and in the area furthest north, limited to the largest flows. Second, apart from the planted windbreak along the western side of the drainage, which is above the banks and/or normal extent of flows, the drainage largely lacks the multi-strata structure of a typical riparian corridor; instead, the vegetation is primarily composed of an herbaceous layer with some vines and brambles along the eastern bank. Third, the presence of emergent vegetation typical of wetlands (e.g., willows and bulrush) has reportedly increased over time despite the drainage's relatively degraded state, suggesting the persistence of subsurface water.³ Fourth, a previous biological assessment report references delineated three-parameter wetlands within the drainage totaling approximately 0.02 ac (Thomas Reid Associates 2005a). Fifth, as detailed in a 2014 comment letter provided by Dr. Peter Baye to the City regarding the Draft Environmental Impact Report for the Pacifica General Plan Update Project, this area was historically a complex of freshwater marsh and alder-willow swamp surrounding what was once Lake Mathilda, a freshwater lagoon outlet of San Pedro Creek prior to its channelization and infill to support the development observed today.⁴ Finally, the project's 2018 IS/MND regarded the drainage as a man-made intermittently flowing swale that would be exempt from creek protections under the Local Coastal Land Use Plan (LCLUP) and asserted that the proposed project would have a less-than-significant impact on sensitive resources even though it acknowledged that the drainage would meet the Coastal Commission definition of a wetland (and despite the lack of a proper delineation at that time).⁵

Wetlands are protected under the Coastal Act by several policies including §30231, which emphasizes the importance of protecting and enhancing water quality and states:

Biological productivity; water quality

The biological productivity and the quality of coastal waters, streams, wetlands, estuaries, and lakes

³ Baye, P. 2014. Letter to City of Pacifica RE: Draft Environmental Impact Report for the Pacifica General Plan Update Project – SCH #2012022046. 29pp

⁴ Baye, P. 2014. *Ibid*.

⁵ City of Pacifica. 2018. 505 San Pedro Avenue Project Initial Study/Mitigated Negative Declaration, Public Review Draft. April 2018.

appropriate to maintain optimum populations of marine organisms and for the protection of human health shall be maintained and, where feasible, restored through, among other means, minimizing adverse effects of waste water discharges and entrainment, controlling runoff, preventing depletion of ground water supplies and substantial interference with surface waterflow, encouraging waste water reclamation, maintaining natural vegetation buffer areas that protect riparian habitats, and minimizing alteration of natural streams.

Another key policy is §30233, which limits the allowance of direct impacts to wetlands to specified situations, requires that such action would constitute the least environmentally damaging feasible alternative, and that the impact is minimized and mitigated for:

Diking, filling or dredging; continued movement of sediment and nutrients

(a) The diking, filling, or dredging of open coastal waters, wetlands, estuaries, and lakes shall be permitted in accordance with other applicable provisions of this division, where there is no feasible less environmentally damaging alternative, and where feasible mitigation measures have been provided to minimize adverse environmental effects, and shall be limited to the following:

- (1) New or expanded port, energy, and coastal-dependent industrial facilities, including commercial fishing facilities.*
- (2) Maintaining existing, or restoring previously dredged, depths in existing navigational channels, turning basins, vessel berthing and mooring areas, and boat launching ramps.*
- (3) In open coastal waters, other than wetlands, including streams, estuaries, and lakes, new or expanded boating facilities and the placement of structural pilings for public recreational piers that provide public access and recreational opportunities.*
- (4) Incidental public service purposes, including but not limited to, burying cables and pipes or inspection of piers and maintenance of existing intake and outfall lines.*
- (5) Mineral extraction, including sand for restoring beaches, except in environmentally sensitive areas.*
- (6) Restoration purposes.*
- (7) Nature study, aquaculture, or similar resource dependent activities...*

Wetland Delineations

In May 2019, the applicant submitted a wetland delineation to inform the proposed project's potential to impose adverse impacts on wetland resources, both on the subject parcel and in the adjacent drainage. This delineation had several issues and shortly following our site visit in October 2019, a second delineation was completed; the delineation dated November 2019 has since been used as a basis for technical analysis. Despite having been completed outside of the wet season when wetlands are best detected and delineated, all three wetland parameters were present in at least some areas⁶ and six different wetland types were identified within the drainage channel, characterized as: arroyo willow thicket, perennial rye grass, small-fruited bulrush marsh, smartweed, ephemeral channel, and wetted channel. Two of these have been mapped on the subject parcel itself (a small area of smartweed within the City's jurisdiction and a large portion of the arroyo willow wetlands at the

⁶ United States Army Corp of Engineers jurisdictional wetlands, based upon the presence of all three parameters (hydrology, vegetation and soils), totaled 0.088 ac; Coastal Commission wetlands, based upon the presence of at least a single parameter, totaled 0.248 ac.

northern end, in the Commission's jurisdiction). Of note is that the increase in area delineated in 2019 relative to what was reported from 2005 (Thomas Reid Associates 2005a) supports observations also made by Dr. Baye that wetland areas have expanded at this location.⁷

According to estimates provided in the analysis of the November 2019 wetland delineation, the proposed development would occur inside the wetland boundary at the arroyo willow thickets where a retaining wall to support an existing earthen berm and proposed pedestrian pathway along the full length of the subject parcel would be constructed. **Figure 5** illustrates that the retaining wall would in fact encroach roughly 20 ft into the willows and directly remove wetland habitat; however, the project fails to qualify as an allowable use under Coastal Act §30233 and moreover, the willow stand also qualifies as ESHA (see next section). Elsewhere along the length of the drainage, the retaining wall would be sited no more than 11 ft from the delineated Commission wetlands while the buildings and other development features would sit between 9 and 30 ft of the wetland boundaries at their nearest points.

Wetland Buffers

Typically, staff recommends at minimum 100-ft buffers surrounding wetland habitats to adequately protect them from the many impacts that they may experience due to adjacent development. Such impacts can include altered drainage patterns and runoff, noise, debris, visual disturbance to wildlife, and inadvertent trampling. In some situations, reduced buffers have been recommended after taking into consideration wetland quality, the surrounding landscape, habitat functions, and the wetland's susceptibility to various impacts; however, buffers sufficient to provide meaningful protection are still generally required.⁸ Here, based on the information available to us prior to April 2020, including a lack of records affirming concerns for sensitive species use, I have advised that **with the proposed BMPs and additional project modifications to avoid direct impacts to wetlands and to protect water quality, that wetland buffers might be reduced to no less than 25 ft along most of the drainage except where delineated by willow thickets and bulrush marsh. Around the willow thickets and bulrush marsh, which constitute arguably robust features providing relatively more habitat value and support for other species (e.g., complex shelter, refuge, foraging), my recommendation was a minimum 50-ft wetland buffer.** Further informing my recommendation is that the willow thickets and bulrush marsh are characterized by the California Department of Fish and Wildlife (CDFW) as sensitive natural communities that qualify as ESHA (see discussion below). These recommended wetland buffers are reflected in **Figure 5** except around a small patch of small-fruited bulrush marsh, which would extend further onto the subject parcel than as depicted.

Environmentally Sensitive Habitat Areas

Coastal Act §30107.5 defines environmentally sensitive [habitat] areas as:

... any area in which plant or animal life or their habitats are either rare or especially valuable because of their special nature or role in an ecosystem and which could be easily disturbed or degraded by human activities and developments.

Rarity determinations for habitats and species are made by CDFW, the United States Fish and Wildlife Service (USFWS), and California Native Plant Society (CNPS), and are used to support Coastal Commission ESHA

⁷ Baye, P. 2014. *Ibid.*

⁸ For example, see: Blackman and O'Connell (A-2-PAC-15-0046) where wetland buffers surrounding a willow stand were reduced to 50 ft, or Trask (A-1-DNC-07-036) where wetland buffers surrounding emergent vegetation were reduced to a minimum 68 ft.

determinations.⁹ An ESHA determination may also be made on the basis of an area constituting ‘especially valuable habitat’ where it is of a special nature and/or serves a special role in the ecosystem, such as providing a pristine example of a habitat type or supporting important ecological linkages.

The key policies addressing ESHA follow under §30240:

(a) Environmentally sensitive habitat areas shall be protected against any significant disruption of habitat values, and only uses dependent on those resources shall be allowed within those areas.

(b) Development in areas adjacent to environmentally sensitive habitat areas and parks and recreation areas shall be sited and designed to prevent impacts which would significantly degrade those areas, and shall be compatible with the continuance of those habitat and recreation areas.

This is notably more restrictive than the preceding wetland policies, as it limits uses of ESHA to those dependent upon it and requires protection from not only direct impacts, but also indirect impacts that may result from adjacent development.

Sensitive Natural Communities

Arroyo Willow Thickets

The arroyo willow thickets located at the northern end of the subject parcel and continuing into the adjacent drainage are classified by CDFW as a natural vegetation community. Although the broader alliance Arroyo Willow as a whole is not considered rare, the more specific association characterized by stands exclusively composed of the namesake species, arroyo willow (*Salix lasiolepis*), is represented at this site and is considered sensitive.¹⁰ While this association does not presently have a rarity ranking, CDFW guidance is to treat communities designated as sensitive, whether or not they are ranked, with comparable protections. Under the Coastal Act, the arroyo willow thickets delineate as a wetland on the basis of their facultative wetland indicator status and therefore, must be treated as wetlands under Coastal Act §30233 rather than as ESHA under §30240¹¹; however, the sensitive natural community status gives weight to the ecological significance of the thickets and is reflected in my more protective buffer recommendation of 50 ft relative to that for other wetlands at this site (except small-fruited bulrush marsh), as detailed above. Though not documented at this location, sensitive species such as the saltmarsh common yellowthroat (*Geothlypis trichas sinuosa*; CA Species of Special Concern) are known to use willow thickets as breeding habitat and many birds and smaller animals use them more generally.

Small-fruited Bulrush Marsh

Similar to the arroyo willow thickets, the small-fruited bulrush marsh identified in the wetland delineation is characterized by CDFW as a sensitive natural community. Specifically, the alliance Small-Fruited Bulrush has a state rarity ranking of S2 indicating that is considered imperiled within the state and at high risk of extirpation. The association characterized by stands exclusively composed of the namesake species, small-fruited bulrush

⁹ CDFW defines natural communities, animals, and plants with a global or state ranking of 1, 2, or 3 as rare and the CCC typically finds these to be ESHA. CCC also typically considers plant and animal species listed by the federal and state endangered species acts (ESA and CESA, respectively) and/or identified under other special status categories (e.g., California Species of Special Concern), and/or identified by the California Native Plant Society (CNPS) as ‘1B’ and ‘2’ plant species as constituting ESHA.

¹⁰ Explanation of alliance vs. association; see Arroyo Willow Thickets alliance (CaCode: 61.201.00) and *Salix lasiolepis* association (CaCode: 61.201.01) in California Sensitive Natural Communities list (version: September 9, 2020) – accessible online at <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=153609&inline>.

¹¹ *Bolsa Chica Land Trust v. Superior Court* (1999) 71 Cal.App.4th 493

(*Scirpus microcarpus*), is represented at this site and though unranked, is considered sensitive.¹² The species is an obligate wetland indicator and like the arroyo willow, is necessarily treated under wetland policies but warrants the protection of a 50-ft buffer due to its ecological significance. Species such as the California red-legged frog (see below) frequently use bulrush habitat for breeding.

Sensitive Wildlife

California Red-Legged Frog

The California red-legged frog (*Rana draytonii*) is federally-listed as threatened and recognized by the state as a Species of Special Concern, is state-ranked as S3 indicating that it is considered vulnerable, and is the official state amphibian.¹³ It is the largest native frog in the western United States and is frequently associated with freshwater emergent wetlands, marshes, and riparian corridors throughout the central California coast but can also inhabit lagoons, ephemeral water bodies, stock ponds, and man-made drainages as well as drier habitat types within the wetter and cooler coastal fogbelt. CRLF uses both aquatic and upland habitat, the former for refuge and breeding, and the latter for foraging, dispersal, and aestivation. Breeding habitat is often characterized by perennial bodies of water with emergent vegetation providing structural complexity such as cattails, bulrush (see above), or dense riparian cover; however, sub-optimal habitats with little to no emergent vegetation and/or that periodically dry out are also known to be used.¹⁴ Dispersal habitat is generally considered to be areas within 1-2 miles of breeding areas, and can include forests, grasslands, coastal scrub, root masses formed by brambles or thickets, and oak woodlands in addition to those already named above.¹⁵ CRLF movement across habitat tends to peak during rainy periods and can vary widely among individuals.

CRLF breeding occurs from November to April. Reproduction rates tend to be highly variable and responsive to climate conditions (e.g., drought vs. wet years). Individuals may remain at breeding sites year-round or disperse to neighboring areas. Along the central coast, the species is particularly mobile and has been documented traversing areas that would not otherwise be expected, especially during wet conditions.¹⁶

CRLF has a diverse diet, which changes throughout its life cycle. Early in its life, it is believed to primarily consume algae, diatoms and detritus.¹⁷ As it matures, terrestrial and aquatic insects tend to make up the largest fraction of its diet, although larger frogs have been documented as consuming smaller invertebrates, including the smaller Pacific chorus frog (*Pseudacris sierra*), which is also common throughout this region.¹⁸ CRLF are considered diurnal but primarily forage at night.

¹² See Small-fruited Bulrush Marsh alliance (CaCode: 52.113.00) and *Scirpus microcarpus* association (CaCode: 52.113.01)

¹³ California Assembly Bill 2364, approved June 28, 2014 - http://leginfo.ca.gov/faces/billNavClient.xhtml?bill_id=201320140AB2364

¹⁴ USFWS. 2004. Federal Register: Endangered and Threatened Wildlife and Plants; Proposed Designation of Critical Habitat for the California Red-legged Frog (*Rana aurora draytonii*); Proposed Rule. 50 CFR. Part 17. Vol 69. No. 71: 19620-19642.

¹⁵ Fellers, G. 2005. *Rana draytonii* Baird and Girard, 1852b California red-legged frog. Pages 552-554 in M. Lannoo (editor). Amphibian declines: the conservation status of United States species. University of California Press. Berkeley, California; CWA database

¹⁶ Bulger, JB, NJ Scott Jr. & RB Seymour. 2003. Terrestrial activity and conservation of adult California red-legged frogs *Rana aurora draytonii* in coastal forests and grasslands. Biological Conservation 110(1): 85-95.

¹⁷ Fellers, G. 2005. *Ibid.*

¹⁸ Hayes, MP & MR Tennant. 1985. Diet and feeding behavior of the California red-legged frog, *Rana aurora draytonii* (Ranidae). The Southwestern Naturalist 30(4): 601-605; Fellers, G. 2005. *Ibid.*

Key threats to CRLF are recognized as habitat loss, urban encroachment, and the introduction of non-native species such as American bullfrogs that can compete with CRLF for habitat as well as prey upon them. Several introduced freshwater fish species are also known prey on CRLF. Herbicide and pesticide use as well as disease may be other significant threats to CRLF, as has been documented for many amphibians around the globe.¹⁹

Prior to April 2020, we were unaware of any records affirming the presence of California red-legged frogs (*Rana draytonii*) at the subject parcel or its immediate surroundings although it has been well-documented at nearby San Pedro Creek.²⁰ While I and the consulting reports I had initially reviewed for this project considered the species to have at least a moderate potential to occur given records from the nearby creek, there has also been recognition of the degraded state of the subject parcel and adjacent drainage as relatively unfavorable when compared to nearby habitat opportunities. No published record had appeared in the California Natural Diversity Database (CNDDDB) beyond the creek's main channel, the project's IS/MND, or the other known reports for the location that staff generally relies upon. In addition, recent neighboring developments within the City's jurisdiction along San Pedro Avenue had truncated the drainage's corridor extension to more forested areas in the south and potential foraging, aestivation, and dispersal areas to the east (**Figure 2**). As such, my recommendations had focused on the wetlands and ensuring that appropriate measures would be taken during construction, in the off chance a frog was encountered.

On April 18, 2020, Commission staff received a report and accompanying photo from Pedro Point resident and San Francisco State University ecologist, Michael Vasey, documenting the presence of CRLF in ponded water at the drainage adjacent to the subject parcel six days prior.²¹ I was able to validate that the animal in the photo (**Figure 6a**) was a CRLF based upon diagnostic markings that were clearly visible and advised Dr. Vasey to submit his documentation to CDFW for further validation and inclusion to the CNDDDB; District staff informed the applicant of this new finding. On April 24, another Pedro Point resident, Sheila Harman, contacted staff on behalf of herself and Jon Harman, with additional reports of having observed as many as four CRLF at the same location at one time and provided both time-stamped photos and a video also showing the surrounding location in relation to San Pedro Avenue to confirm this (**Figure 6b-c**).²² She also commented that this was the first time in the past seven years that they had observed CRLF at the site, indicating previous but undocumented observations. On April 28, Dr. Vasey communicated with staff again, indicating that he and the Harman's had now seen as many as five CRLF at a time in the drainage ditch along San Pedro Avenue and the pool just past the culverts feeding into the drainage adjacent to the subject parcel at 505 San Pedro Avenue.²³ He also relayed a 2014 comment letter he had discovered through conversation with Peter Baye, another ecologist working along the central coast. This letter is referenced above in the discussion on wetlands.²⁴

Dr. Baye's 2014 letter provides important insights specific to CRLF, the surrounding area, and the drainage itself.

¹⁹ Davidson, EW, M Parris, JP Collins, JE Longcore, AP Pessier, & J Brunner. 2003. Pathogenicity and transmission of chytridiomycosis in tiger salamanders (*Ambystoma tigrinum*). *Copeia* 2003(3): 601-607.

²⁰ CNDDDB records for Occurrence Number 652 cover the lower half-mile of San Pedro Creek since 2002, when a total of 5 frogs were recorded from approximately 0.2 mi north of the subject parcel; reports since 2014 have more frequently detailed occurrences, including as many as 129 frogs caught in June-October in 2014 and notes that that adults were observed year-round in 2015. Egg masses were documented in 2014 and 2015.

²¹ Vasey, M. (personal communication, April 18, 2020)

²² Harman, S. (personal communication, April 24-29, 2020)

²³ Vasey, M. (personal communication, April 29, 2020)

²⁴ Baye, P. 2014. *Ibid*.

He presents information on CRLF not found in the research various parties had conducted, including reporting having observed CRLF at the drainage over different seasons since at least 2005 and having submitted an official report to USFWS in 2005.²⁵ Dr. Baye specifies that his observations have occurred regularly at the drainage and that CRLF have been most frequently found in the ponded, perennially wet area [scour pool] nearest San Pedro Avenue, the location neighborhood residents made reports from in April 2020. He hypothesizes that these animals may represent a local sub-population with a relationship to the lower San Pedro Creek wetland complex and that this perennially wet area may be breeding habitat given his observations of intermittent local population fluctuations and observation of other habitat requirements being immediately proximate, including the large field just west of the drainage. He also states that he believes this area would qualify as ESHA. Dr. Baye's report goes on to note that CRLF was apparently absent throughout the drought period beginning in 2012 through the time of his report in 2014. As the drought ended in the winter of 2017, it is not all the surprising that the applicant's consultants would not have observed CRLF at the site when conducting the biological assessments in 2015 (Coast Ridge Ecology) or January 2017 (Live Oak Associates) as the area was just coming out of drought status.²⁶

I reached out to colleagues at CDFW and the USFWS in May 2020 to further investigate whether there was any other unpublished CRLF occurrence information, either from the drainage or otherwise nearby apart from San Pedro Creek. CDFW staff at the Biogeographic Branch were able to confirm that Dr. Vasey's April 2020 CNDDDB submission appeared to be valid, including the species identification; since then, his record has been processed and officially incorporated to the state database (**Figure 2**). USFWS staff from the Bay-Delta Regional Office indicated that while they did not have the 2005 record submitted by Dr. Baye available digitally, it was likely that it has been held as a paper file that cannot be accessed readily due to constraints imposed by the current pandemic. Nonetheless, they were not surprised by the contemporaneous observations and were able to provide comments on recent observations from nearby San Pedro Creek²⁷ as well as advise that ESA Section 10 permitting may be necessary and that recommended habitat corridors for CRLF are typically 300 ft, which is consistent with Commission decisions elsewhere along this part of the coast.²⁸

In response to the discovery of CRLF in April 2020 at the drainage channel, the applicant's consultant at Coast Ridge Ecology (2020) has observed that significantly more water appears to be flowing through the drainage now than during their initial assessment in 2015. Notably, 2015 would have been several years into a drought (stage 3: extreme drought) whereas conditions were less severe in 2020 (stage 1: moderate drought), so this might be reasonably expected.²⁹ The consultant speculates that the differences could be a result of supplemental water inputs from nearby residential properties but does not provide any evidence thereof or consider alternative explanations (including relative drought conditions). They also express doubt concerning CRLF's ability to have moved from San Pedro Creek into the drainage and suggest that they may have been "assisted by humans (i.e. planted in the drainage)". They consider the area "isolated" without acknowledging the dispersal range and known movement patterns of the species, particularly in the coastal fogbelt, where culverts connect the drainage channel directly to a City restoration area and ultimately, San Pedro Creek only 300 ft away from the north end of

²⁵ Baye, P. 2005. Letter to United States Fish and Wildlife Service RE: Documentation of California red-legged frog occurrence at Pedro Point, Pacifica, San Mateo County. May 4, 2005.

²⁶ <https://www.drought.gov/historical-information> for January 2017

²⁷ For example: United States Fish and Wildlife Service. Consultation Letter to United States Army Corps of Engineers RE: Formal Consultation on the San Pedro Terrace Project in San Mateo County, California. Reference #08ESMF00-2017-F-1370. April 5, 2018.

²⁸ UC Santa Cruz Marine Science Campus - Coastal Long Range Development Plan. January 2017. 344pp.

²⁹ <https://www.drought.gov/historical-information> for March 2015 and April 2020

the subject parcel. Though these avenues of dispersal are perhaps not the most idyllic, the species is capable of having used any variety of these. Finally, the consultant argues that the location is unlikely to provide “*consistent, stable long-term habitat for [CRLF] over time*” and that it would likely be considered a population sink. However, CRLF is known to use (and require) a mosaic of habitat types across the landscape and we cannot ignore that the species has been documented using this location intermittently for decades, even in the absence of focused study. Moreover, it is not necessary for CRLF to carry out its full life cycle in the drainage for the area to have ecological value for this sensitive species.

In August 2020, I reached out to Dr. Baye to inquire whether he had a copy of his 2005 report to the USFWS, which had been referenced in his 2014 letter. He was able to forward this report to staff, including photos of CRLF, thus providing additional information that had not been otherwise available through standard data searches or inquiries during the pandemic. On May 4, 2005, Dr. Baye reported to USFWS having observed three adult CRLF at the [scour] pool adjacent to San Pedro Avenue on the previous day, at the southern end of the drainage ditch directly adjacent to the subject parcel. He also states that he had observed “*multiple aural detections of diving frogs in April*” and indicates that water turbidity limited visual detections but “*no egg masses were observed within the visible upper 10 cm of water column.*” **Figure 7** is excerpted from Dr. Baye’s report and also appears in his 2014 letter to the City.

In the course of my research, I also sought out the biological assessment report from 2005, which had been referenced in the May 8, 2015 staff letter to the City regarding review coordination for the proposed project. Although such reports are generally considered outdated after five years for the purposes of evaluating current conditions at a site, they can be informative in the context of habitat change as well as documenting patterns of use (or likely use). Where data is limited and/or species may not be readily detected, historical reports can be especially helpful. In this situation, I located not only the biological assessment report (Thomas Reid Associates 2005a) but also discovered a site assessment specifically for CRLF (Thomas Reid Associates 2005b). Both 2005 reports had been intended to inform a different project at the same location, which would have restored habitat over approximately 60% of the subject parcel including the willow thickets and upland areas to be contiguous with the then-planned wetland restoration at San Pedro Creek. Concerning CRLF, while the species was not explicitly confirmed on-site by these two reports, it was regarded that “*there is a high potential for them to be present within proximal aquatic habitats... [including] the drainage ditch adjacent to the property as a traveling corridor or nearby upland areas for aestivation*” and the consultants recommended “*that this report be submitted to the [USFWS]*” for further consultation, though it remains unclear whether it ever was. The proposed restoration was apparently anticipated to benefit CRLF among other species.

The recent repeated daytime observations of multiple CRLF at the roadside end of the drainage indicates that even in the absence of formal surveys, the area has been functioning as habitat for more than an individual transient CRLF. Consideration of this, the multiple reported occurrences of CRLF at the drainage since at least 2005, and the concurrence of information from colleagues at partner resource agencies informs my revised opinion that CRLF occurrence here is not a moderately hypothetical possibility but in fact, a demonstrated pattern of use. Given the connection to San Pedro Creek, including by way of the underground culvert, the observations of CRLF near San Pedro Avenue, wetlands, and evidence of the drainage’s role as a green corridor year-round, the full length of the drainage adjacent to the subject parcel should be considered habitat. In addition, because CRLF requires not only wetted areas but also makes use of upland habitats for foraging, dispersal, and estivation, this habitat is very likely extends to adjacent upland areas on either side of the drainage. Though we cannot presently delineate the full extent of CRLF use in these areas without protocol-level surveys, we can interpret that at a

minimum, the drainage itself constitutes ESHA and is likely functioning as a habitat corridor for this species between San Pedro Creek and upland areas.

Habitat Corridors

The drainage running adjacent to the subject parcel arguably constitutes a habitat corridor for CRLF but additionally, likely supports several other species moving across the landscape as well. As evident from the time-series of aerial imagery (**Figure 4**), the drainage remains relatively green throughout the seasons and as compared to adjacent parcels. It also connects to San Pedro Creek (through culverts), the shore, and the Pacific Ocean in the north; a large open space to the west; historically, to spaces in the east beyond the subject parcel (i.e. the parcel due east of Halling Way, along San Pedro Avenue); and to a major forested area to the south, which again connects to San Pedro Creek, though this connection was somewhat fragmented by recent development.

Despite the more recent encroachments of development, it remains that the drainage provides a connection across the landscape capable of supporting many species including birds and small mammals that may be less affected by some of these interruptions. For example, birds move primarily by line of sight rather than on-the-ground conditions and while raptor nests have not been observed in the trees immediately along the drainage, the forested area to the south is better-suited for such and the large open space just west of the drainage provides excellent conditions for foraging on fossorial rodents and small reptiles; raptors have been regularly observed using the area.³⁰ These same small animals (and others) are likely to find refuge within the drainage relative to sun, wind, and predator exposure where surrounding areas are paved, mowed, or otherwise devoid of vegetation. During my brief roadside visit in March 2019, I observed a duck resting among ponded waters of the drainage (**Figure 3e**) indicating that waterfowl also use the shaded and wetted area at least occasionally. Small mammals such as skunks, raccoons, and coyote would all be likely to make use of the drainage area as well.

In addition, the California Essential Habitat Connectivity Project identifies a major natural landscape block beginning in Pacifica and extending south through the San Mateo and Santa Cruz Counties coast and mountains (**Figure 8**).³¹ It also recognizes “small” natural areas (defined as < 2000 ac), with one of approximately 140 ac occurring some 800 ft south of the project site, in the forested area that has already been discussed (**Figure 9**). All of this emphasizes the especially valuable role of the drainage in facilitating connections across a semi-developed landscape, from the shore and creek mouth to forested areas inland, as well as open spaces that can function as upland habitat and foraging grounds, and I recognize it as a habitat corridor rising to the level of ESHA.

ESHA Delineation & Buffers

The sensitive natural communities of **Arroyo Willow Thickets and Small-fruited Bulrush Marsh both constitute ESHA** in addition to wetlands, as delineated in the November 2019 wetland delineation report. As stated above in the wetlands section, **buffers of 50 ft should be applied to these two areas.**

As a federally-threatened and California Species of Special Concern, the California red-legged frog qualifies for Coastal Act protection under ESHA policies. Thus, the revelation that CRLF does, and has, in fact occurred at this location necessitates consideration of habitat beyond that of the wetlands. With the limited documentation available, it is not possible to precisely delineate boundaries for CRLF habitat but we can observe that there is no

³⁰ eBird records for the area include white-tailed kites, golden eagles, sharp-shinned hawks, red-shouldered hawks, and red-tailed hawks – www.ebird.org

³¹ Spencer, WD, P Beier, K Penrod, K Winters, C Paulmann, H Rustigian-Romsos, J Strittholt, M Parisi and A Pettler. 2010. California Essential Habitat Connectivity Project: A Strategy for Conserving a Connected California. Prepared for California Department of Transportation and California Department of Fish and Game, and Federal Highways Administration. 313 pp.

biological argument that would exclude CRLF from the subject parcel or limit its movement to the narrow drainage immediately adjacent. Provided the species ecology, including dispersal and foraging patterns along the central coast, I expect it will readily use nearby upland areas and move freely with little regard for topography or substrate. Given the USFWS recommendation of providing CRLF with at least a 300-ft dispersal corridor where it is known, we can conclude that even if this width was centered on the drainage, it would extend across and beyond the subject parcel well to the east (**Figure 5**); therefore, **I find that the entire subject parcel constitutes CRLF ESHA and that this extends some yet-to-be-defined distance beyond the parcel. No buffer recommendation is provided since it is irrelevant in the absence of an outer habitat limit from which to apply.**

Habitat corridors are increasingly critical to preserve as natural lands are converted and encroached upon by development; however, their delineation can be challenging since each species will use the space differently. Often, riparian areas are treated as corridors with the outermost extent of riparian vegetation being recognized as the edge, from which buffers are then applied to ensure that wildlife movement in and out of riparian cover is protected for some distance. In this case, it is clear that the drainage adjacent to the subject parcel is part of a larger network connecting different habitats but its boundaries are less well-defined by a canopy than riparian areas and it is likely somewhat more permeable within the landscape mosaic. Because we know that CRLF is almost certainly using the drainage as a corridor but cannot clearly define the bounds of such use with the data available, the same determination must transfer to the EVH-based ESHA – **I find that the subject parcel is part of a general habitat corridor ESHA, which extends some yet-to-be-defined distance beyond the parcel. No buffer recommendation is provided since it is irrelevant in the absence of an outer limit from which to apply.**

In conclusion, I find that the subject parcel includes wetlands, Arroyo Willow Thicket ESHA, California red-legged frog ESHA, and habitat corridor ESHA. These sensitive habitat resources are continuous with the immediately adjacent drainage, which additionally includes Small-fruited bulrush marsh ESHA. The boundaries of at least some of these sensitive resources extend beyond both the drainage and subject parcel, resulting in the entire subject parcel necessarily being recognized as ESHA in addition to the wetlands that have also been delineated there.

Figure 1a: 505 San Pedro Avenue parcel (approximated in yellow) as situated in the broader surrounding landscape, and **b:** relative to specific features including the adjacent drainage (approximated by dashed white arrow), scour pool (red asterisk), and willow thickets.



[illegible]

Figure 3: Photos from site visits in March and October 2019, showing seasonal variation in drainage conditions – **a-b:** culvert running parallel to San Pedro Avenue, immediately west of the drainage and subject parcel; **c-d:** from San Pedro Avenue, facing north with scour pool in foreground; **e-f:** from San Pedro Avenue, facing north-northwest into drainage (note Eucalyptus wind break on left (west) before open field and subject parcel on right (east), and duck (white circle) using drainage as resting area in e); **g:** from western side of drainage, looking south towards San Pedro Avenue (note continuation of tree canopy into forested area south of San Pedro Avenue).



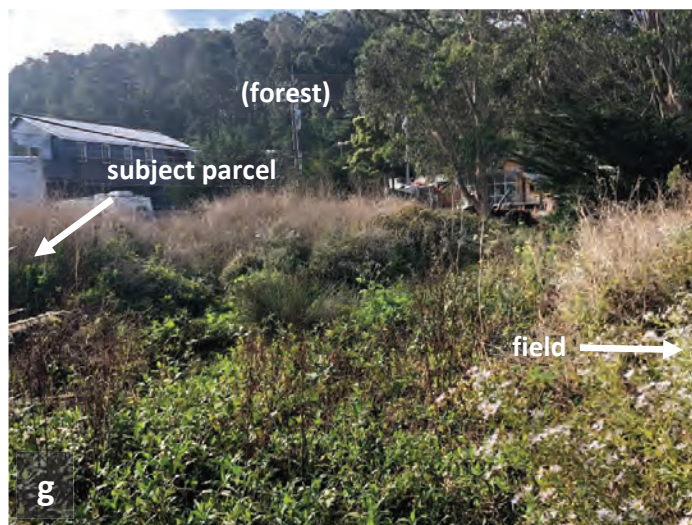


Figure 4: Subset of larger aerial time series (2002-2020) of the subject parcel (yellow box) and the surrounding landscape, showing wet versus dry season patterns of vegetation. Note how the drainage immediately adjacent to the subject parcel consistently provides a green corridor and effectively links San Pedro Creek with the open field to the west while providing a valuable secondary connection to the forested habitat south of the site.







[illegible]

Figure 6a: CRLF as observed at San Pedro Avenue on April 12, 2020 by Michael Vasey, Sheila Harman and Jon Harman (photo credit: Jon Harman); **b-d:** CRLF as observed at San Pedro Avenue on April 23, 2020 by Sheila Harman. Individual CRLF circled in white for visibility.

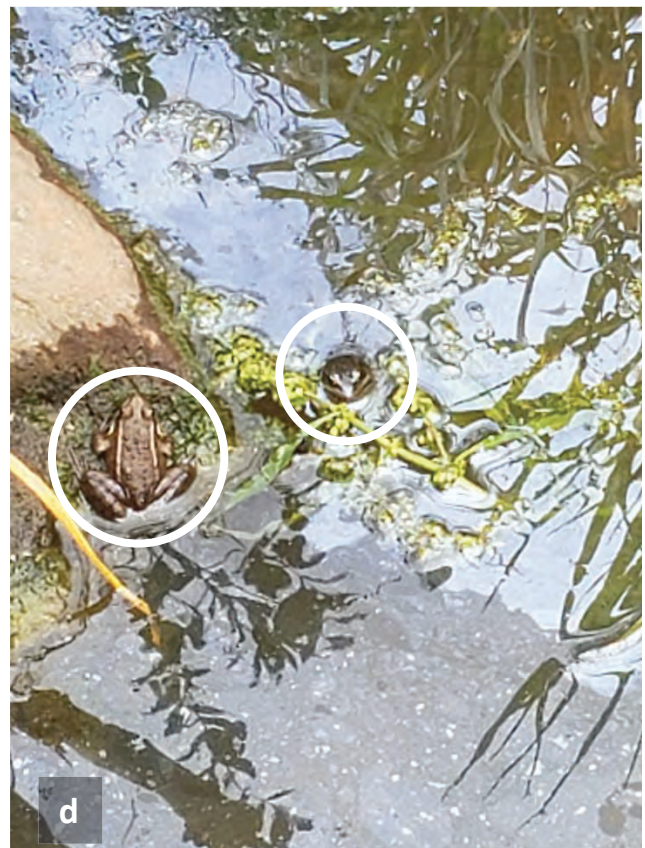
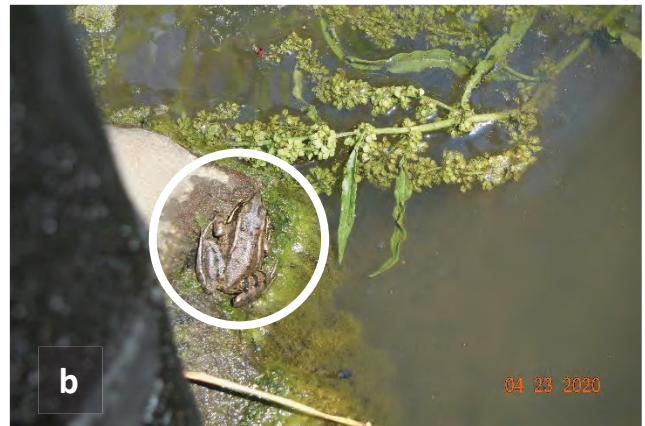
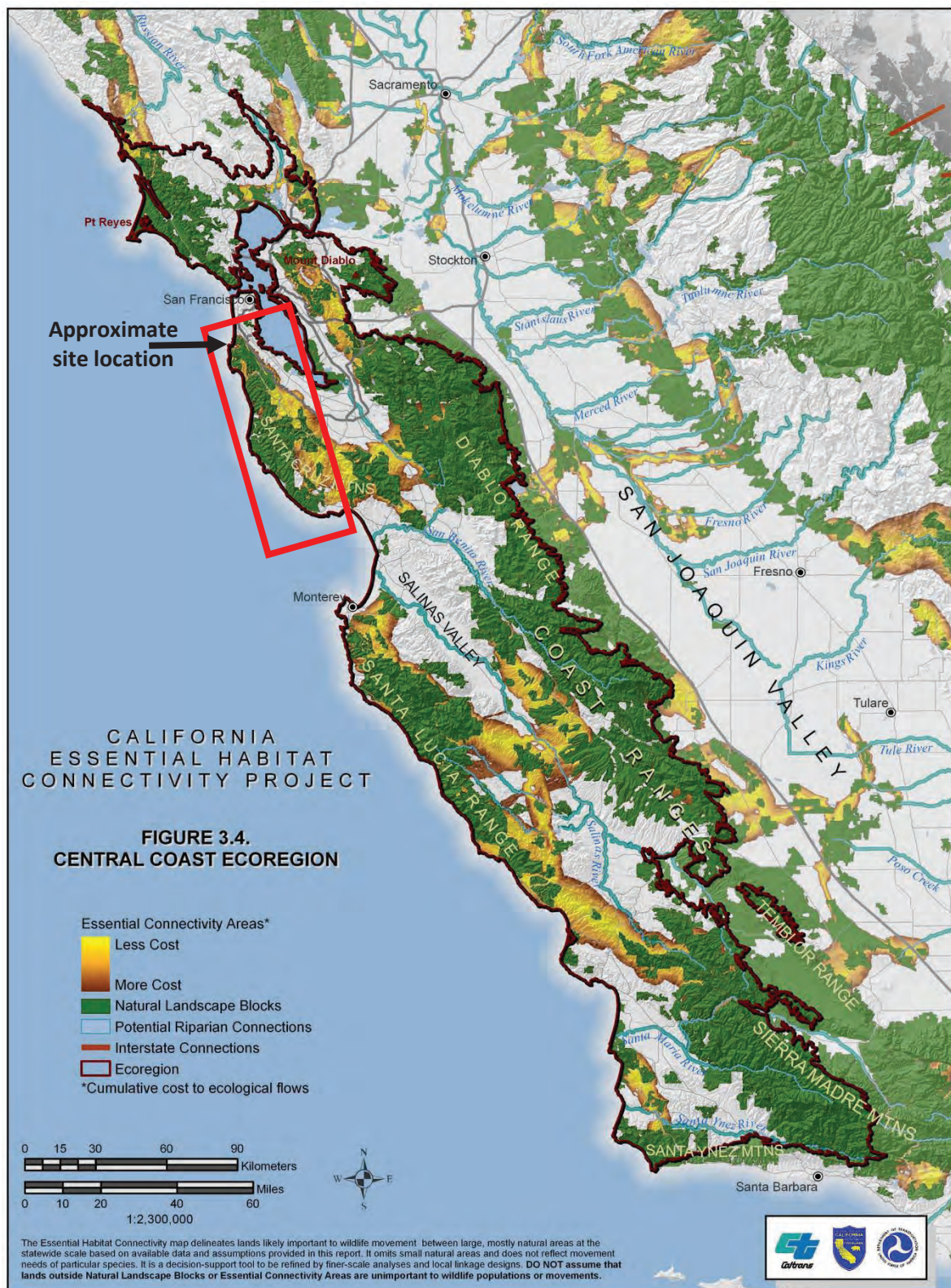


Figure 7a: From San Pedro Avenue, looking northeast, view of scour pool in drainage with subject parcel as grassy area immediately behind the fence, and **b:** CRLF observed in scour pool by Peter Baye. Photos by Peter Baye, as submitted to USFWS in May 4, 2005 letter.



Figure 8: Excerpt from California Essential Habitat Connectivity Project displaying the San Mateo-Santa Cruz Counties coastal corridor (within red box). The project location in Pacifica is approximately located at the black arrow, near the northern edge of the extent. Areas in green represent connected stretches of habitat and the yellow-brown spectrum represents areas that would ideally be added to provide better linkages. The Pedro Point area is among those areas identified as valuable additions to improving connections through this corridor.



[illegible]

From: [Gary Furlong](#)
To: NorthCentralCoast@Coastal
Subject: March 8th CCC Meeting - Agenda Item 14: Local Coastal Programs (LCPs): City of Pacifica Local Coastal Program Amendment Number LCP-2- PAC-20-0036-1 (City of Pacifica LUP Update)
Date: Thursday, March 2, 2023 10:50:37 PM

Dear Commissioners,

I have reviewed the report about what is being considered for the field on Pedro Point in Pacifica. I appreciate that you have taken time to carefully consider the issues involved in this matter but would ask that you take the time for further consideration. It is my belief that some of the proposed changes pose conflicts that are not addressed in the staff's proposed modifications. My concern is that once this is done, it's done forever; more time in consideration would be prudent. My neighbor, Joanne Gold, has already submitted details about ESHA and habitat-for-species-of-special-interests conflicts so I will not repeat those details here but ask that you give her concerns your full attention.

Among the issues that she rightly raises are the presence of the endangered Red Legged Frog as well as the concern that the area itself is ESHA (which has been previously documented by the Coastal Commission itself). In the near past this field has existed in a somewhat different state than its normal state, due to our drought. However, with the return of our wet season the field has reverted to its previous state of deep dampness, perhaps even marsh, and with that the rebound of it's ESHA state.

I would also ask that the Coastal Commission take the additional time to consider that the proposed changes will create an area that will be 180 degrees different from its current state, which will be in conflict with ESHA and CEQA guidelines which lay out that consideration needs to be given for the current state of an area when considering changes. The field will go from an area that is marshy, has an endangered species and an environmentally sensitive area to one that is, literally, full of houses, packed as closely together as possible. It will go from a neighborhood gathering spot that has been shared with wildlife, where paths have been used for decades, to a series of private lots that will allow no such communal or wildlife use. Instead of wild birds and Red Legged Frogs we'll see concrete, pavement, houses and chain link fences.

I urge you to put in place strong, environmentally sensitive protections for this area. I wish I could say that the city of Pacifica would be a trusted guardian of this environmentally sensitive area but the city council has a consistent record of building first and asking questions later.

Thank you for taking the time to consider my letter.

Regards,
Gary Furlong

From: [CATHY GLENN](#)
To: NorthCentralCoast@Coastal
Subject: March 8th CCC Meeting - Agenda Item 14: Local Coastal Programs (LCPs); City of Pacifica Local Coastal Program Amendment Number LCP-2 - PAC-20-0036-1 (City of Pacifica LUP Update)
Date: Thursday, March 2, 2023 6:38:55 PM

Dear Commissioners,

I'm writing to comment on the City of Pacifica's proposed update of its Local Coastal Program (LCP) and Land Use Plan (LUP) - Program Amendment Number **LCP-2-PAC-20-0036-1**.

I have read the Summary of Staff Recommendations, and support the staff's suggested modifications, but additional refinements are needed before you vote to approve this LCP/LUP.

Some of the proposed changes to land use designations pose conflicts that are not currently addressed in the staff's proposed modifications. In particular are the ESHA conflicts related to the undeveloped site west of the Pedro Point shopping center (also known as the Pedro Point field on San Pedro Ave.)

My neighbor, Joanne Gold, has already submitted details about ESHA and habitat-for-species-of-special-interest conflicts in an email sent to Commissioners on March 2nd, including:

- The presence of California Red Legged Frogs (CLRF) in the freshwater swale adjacent to the Pedro Point field - a species of special concern that requires specific protections
- The swale itself, which has been determined as ESHA due to the wildlife and plant species that exist there and have previously been documented by the Coastal Commission
- The proposed CRMU land use designation, which conflicts with ESHA and CEQA guidelines that require changes in designation and zoning to consider the current state of the field as the environmental baseline.

Local citizens like myself have been providing the City of Pacifica with scientific data and neighborhood feedback related to this sensitive undeveloped parcel for many years only to be ignored. **I strongly urge you to defer voting on this amendment on March 8th, and consider adding further required modifications** to ensure that Pacifica has a functional, responsible LCP/LUP that protects and enhances our coastal environment.

Sincerely,

Cathy E, Glenn

Pacifica Resident for 44 years, Pedro Point resident for 34 years
1324 Grand Avenue,
Pacifica, CA 94044
glennfamily5@comcast.net

From: [Andy Narraway](#)
To: [NorthCentralCoast@Coastal](#)
Cc: [KoppmanNorton, Julia@Coastal](#); [Ringuette, Oceane@Coastal](#)
Subject: March 8th CCC Meeting - Agenda Item 14: Local Coastal Programs (LCPs); City of Pacifica Local Coastal Program Amendment Number LCP-2- PAC-20-0036-1 (City of Pacifica LUP Update)
Date: Friday, March 3, 2023 10:27:43 AM

Dear Commissioners,

I have been a Pacifica resident for over 10 years and am writing to comment on the City of Pacifica's proposed update of its Local Coastal Program (LCP) and Land Use Plan (LUP) - Program Amendment Number LCP-2- PAC-20-0036-1.

I have read the Summary of Staff Recommendations, and support the staff's suggested modifications and I thank you for your input so far, but I must insist that additional refinements are needed before you vote to approve this LCP/LUP.

The CCC is simply proposing a modification requiring the City to "ensure that all biological constraints are considered for this site prior to any future development". That's it, and it's not nearly enough.

Some of the proposed changes to land use designations pose conflicts that are not currently addressed in the staff's proposed modifications. In particular are the ESHA conflicts related to the undeveloped site west of the Pedro Point shopping center (also known as the Pedro Point/Calson field on San Pedro Ave, Pacifica)

A recent building proposal at 505 San Pedro (adjoining the Pedro Point field) was recently rejected by the CCC, PRECISELY because of ESHA concerns, so HOW can the commission now take the opposite approach and dismiss these issues by considering rezoning? I quote the Pacifica Tribune March 9, 2021: "Coastal Commission staff in its report about 505 San Pedro Ave. recommended denying the project due to "habitat inconsistencies" for the California red-legged frog. Staff gave the project site a wetlands delineation due to a nearby watercourse and the potential for sensitive coastal resources to be on or near the project."

I understand many of my neighbor's have already submitted details about ESHA and habitat-for-species-of-special-interest conflicts in emails sent to Commissioners, including:

The presence of California Red Legged Frogs (CLRF) in the freshwater swale adjacent to the Pedro

Point field - a species of special concern that requires specific protections

The swale itself, which has been determined as ESHA due the wildlife and plant species that exist there

and have previously been documented by the Coastal Commission

The proposed CRMU land use designation, which conflicts with ESHA and CEQA guidelines that require

changes in designation and zoning to consider the current state of the field as the

environmental
baseline.

Please add my name and comments to this list of concerned citizens who have continually been ignored by the City of Pacifica for far too long. Local citizens like myself have been providing the City of Pacifica with scientific data and neighborhood feedback related to this sensitive undeveloped parcel for many years only to be ignored. I strongly urge you to defer voting on this amendment on March 8th and consider adding further required modifications to ensure that Pacifica has a functional, responsible LCP/LUP that protects and enhances our coastal environment.

Sincerely,
Andrew Narraway
Grand Avenue, Pacifica CA 94044

From: [John Peterson](#)
To: NorthCentralCoast@Coastal
Subject: March 8th CCC Meeting / Agenda Item 14: Local Coastal Programs (LCP); City of Pacifica Local Coastal Program Amendment #LCP-2-PAC-20-0036-1 (City of Pacifica LUP Update)
Date: Friday, March 3, 2023 8:44:58 AM

Dear Commissioners,

I'm writing to comment on Pacifica's LCP and LUP, Program amendment #LCP-PAC-20-0036-1 after I read the staff recommendation summaries pertaining to the undeveloped site west of Pedro Point Shopping Center. I am concerned that some of the proposed changes to land use designations pose conflicts to the ESHA and hazard zone related to this site. I would like to add the following:

- Consider that every spring there are the sounds of frogs in the Pedro Point field and swale and this has always been this way.
- I understand that it is local common and documented knowledge that this area fills up with runoff during fall/winter/spring storms because it is a previous wetland and a known flood plain that acts as a catch basement for the surrounding hillsides. I've been here in Pacifica Linda Mar area since 1961 to 75, and returned to live in Pedro Point from 96-present. While living in Pedro Point, this area has quite a bit of wildlife. Egrets, herons, small mammals, hawks, owls, the occasional bobcat, and of course, the frogs.
- The above nature points should be considered in the update of the LCP and LUP.

Please consider to defer the voting on this amendment on March 8th and consider these above facts that I have been providing to all entities for years. This is an important decision and the local voices need to be heard!

Thanks,

John Peterson
415-531-5616
winsurfa@gmail.com

TO: NorthCentralCoast@coastal.ca.gov

RE: **March 8th CCC Meeting - Agenda Item 14:** Local Coastal Programs (LCPs); City of Pacifica Local Coastal Program Amendment Number **LCP-2- PAC-20-0036-1** (City of Pacifica LUP Update)

Dear Commissioners,

I'm writing to comment on the City of Pacifica's proposed update of its Local Coastal Program (LCP) and Land Use Plan (LUP) - Program Amendment Number **LCP-2- PAC-20-0036-1**.

I have read the Summary of Staff Recommendations, and support the staff's suggested modifications, but additional refinements are needed before you vote to approve this LCP/LUP.

Some of the proposed changes to land use designations pose conflicts that are not currently addressed in the staff's proposed modifications. In particular are the ESHA conflicts related to the undeveloped site west of the Pedro Point shopping center (also known as the Pedro Point field on San Pedro Ave.)

My neighbor, Joanne Gold, has already submitted details about ESHA and habitat-for-species-of-special-interest conflicts in an email sent to Commissioners on March 2nd, including:

- The presence of California Red Legged Frogs (CLRF) in the freshwater swale adjacent to the Pedro Point field - a species of special concern that requires specific protections
- The swale itself, which has been determined as ESHA due the wildlife and plant species that exist there and have previously been documented by the Coastal Commission
- The proposed CRMU land use designation, which conflicts with ESHA and CEQA guidelines that require changes in designation and zoning to consider the current state of the field as the environmental baseline.

Local citizens like myself have been providing the City of Pacifica with scientific data and neighborhood feedback related to this sensitive undeveloped parcel for many years only to be ignored. **I strongly urge you to defer voting on this amendment on March 8th, and consider adding further required modifications** to ensure that Pacifica has a functional, responsible LCP/LUP that protects and enhances our coastal environment.

Sincerely,

Essam Metwally, Pacifica Resident for 6 years
240 Stanley Ave, essam@metwally.org

Exhibit A

CLRF in the freshwater marsh swale adjacent to the Pedro Point field



CLRF –May 2022



Tadpoles - August 2021



CLRF - August 2021

EXHIBIT B

Pedro Point Field Existing Flooding Condition Hazards



Oct. 2021



Oct. 2021

Linda Mar
State Beach
access point
to beach



Dec. 2022



Dec. 2022 - San Pedro Rd. Flooding in front of field

March 3, 2023

TO: NorthCentralCoast@coastal.ca.gov

RE: March 8th CCC Meeting - Agenda Item 14: Local Coastal Programs (LCPs); City of Pacifica
Local Coastal Program Amendment Number **LCP-2- PAC-20-0036-1** (City of Pacifica LUP Update)

Dear Commissioners,

I'm writing to comment on the City of Pacifica's proposed update of its Local Coastal Program (LCP) and Land Use Plan (LUP) - Program Amendment Number **LCP-2- PAC-20-0036-1**.

While I have read the Summary of Staff Recommendations, and support many of the staff's suggested modifications, I feel strongly that additional focus is needed on specific issues before you vote to approve this LCP/LUP.

Significantly, some of the proposed changes to land use designations pose conflicts that are not currently addressed in the staff's proposed modifications. Specifically, the ESHA conflicts related to the undeveloped site west of the Pedro Point shopping center (also known as the Pedro Point field ("Field") on San Pedro Ave.

Land Use Designation

The record is replete with detailed scientific reports provided over the years from respected experts retained by the Pedro Point Community Association (PPCA) that presented multiple hazard and environmental restraints data to the City of Pacifica (and to the Coastal Commission). These hazards include flooding, SLR issues, liquefaction, tsunami danger (the field is designated by the City as a Tsunami Evacuation Area), federally designated wetlands, as well as ESHA and protected species habitat. Yet, the City of Pacifica repeatedly ignored the data.

My view, as well as other residents of the City, is that the summary of staff recommendations correctly states that the proposed LUP provisions "are not consistent with the Coastal Act, as it relates to coastal hazards and sea level rise conditions along the coastline..." However, the modifications noted in the report are not sufficient as they fail to address the known ESHA conflicts and species of special concern that exist within the parcel.

My neighbor, Joanne Gold, has already submitted details about ESHA and habitat-for-species-of-special-interest conflicts in an email sent to Commissioners on March 2nd, including:

- The presence of California Red Legged Frogs (CLRF) in the freshwater swale adjacent to the Pedro Point field - a species of special concern that requires specific protections
- The swale itself, which has been determined as ESHA due to the wildlife and plant species that exist there and have previously been documented by the Coastal Commission
- The proposed CRMU land use designation, which conflicts with ESHA and CEQA guidelines that require changes in designation and zoning to consider the current state of the field as the environmental baseline.

Flood Zone

I want to highlight that the Field sits at the lowest part of Pedro Point which means it is a catch basin from the rain runoff. Please view the photos in Exhibit A showing dramatic flooding in the Field and in Pedro Point. These pictures and those provided by my neighbors provide a clear view of the immense issues regarding the field and changes to the land use designation and the resulting impact to the community. Please know there is only one way in and out of Pedro Point and the flooding is a clear and present danger during the rainy season.

As President of the PPCA, I'd like to extend an invitation to the Commissioners to come to Pedro Point for a tour to see the field, the ESHA area, and entire neighborhood in-person that are deeply impacted by the LCP/LUP.

We appreciate the hard work by the CCC staff in assessing and evaluating the City of Pacifica's Local Coastal Program Amendment. Likewise, our community appreciates your time and thoughtful approach to reviewing the LCP/LUP. We look to the CCC to make certain environmental protections are clearly in place to protect sensitive habitats as well as the residents in the coastal zone.

Our community wants a responsible LCP/LUP, but we are requesting further analysis and additional modifications which we believe are imperative to ensure Coastal Act consistency.

I strongly urge you to defer voting on this amendment on March 8th and consider adding further required modifications to ensure that Pacifica has a functional, responsible LCP/LUP that protects and enhances our coastal environment.

Sincerely,

Allison West, President, Pedro Point Community Association
Pacifica resident for 20 years
280 San Pedro Ave
650-922-4611

Exhibit A

Pedro Point Field Existing Flooding Condition Hazards



Oct. 2021



Dec. 2022