

CALIFORNIA COASTAL COMMISSION

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Th9a

2-15-1357-A2 (San Francisco Public Utilities Commission
Armoring)

MAY 11, 2023

CORRESPONDENCE

April 24, 2023

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

RE: Public Comment on May 2023 Agenda Item Thursday - Permit
Amendment Application No. 2-15-1357-A2 (San Francisco Public Utilities
Commission Armoring, Ocean Beach)

Dear Commissioners,

The San Francisco Public Utilities Commission (SFPUC), on behalf of the City and County of San Francisco (CCSF) is writing today in full support of the staff recommendation for Agenda Item Thursday – Permit Amendment Application No 2-15-1357-A2, which is a time extension for San Francisco's Ocean Beach Climate Change Adaptation Project, Short-term Improvements. The extension is requested to allow for some additional time for the completion of the Long-term Improvements Project's Coastal Development Permit authorization.

The SFPUC, in coordination with SF Recreation and Parks, SF Public Works and SFMTA and numerous consultant teams have been meeting regularly and working diligently with Coastal Commission Staff and numerous other agencies to advance the design and environmental review of the Long-term Improvements since we were here before you in November 2021. The exciting news is that we have made a lot of progress together on this very large and challenging project. Since November 2021, the team worked to advance design from 35% to 65% (with 95% planned for May 2023), submitted a comprehensive CDP application package for the Long-term Project and in December 2021, the San Francisco Planning Department released the Draft Environmental Impact Report. They received several hundred comments which necessitated revisions to the project design and the development of several additional technical reports. It's been a lot of additional work, but we are very excited to announce that we expect our Response to Comments to be released by mid-July 2023.

London N. Breed
Mayor

Newsha Ajami
President

Sophie Maxwell
Vice President

Tim Paulson
Commissioner

Tony Rivera
Commissioner

Kate Stacy
Commissioner

Dennis J. Herrera
General Manager



We are also working on supportive documentation for our CDP Application. Those include a Monitoring and Adaptive Management Plan and a Habitat Restoration and Enhancement Plan. With these important documents, Coastal Commission staff will continue their analysis and now anticipate bringing this Long-term Improvements project to you prior to June 30, 2024.

We appreciate the opportunity to share these important updates with the Commission and look forward to finalizing the necessary documents to allow us to bring this project forward to construction as soon as possible.

Sincerely,

Anna M. Roche

Anna M. Roche
Project Manager, Ocean Beach Climate Change Adaptation Project

KoppmanNorton, Julia@Coastal

From: Dennis Holl <denholl52@gmail.com>
Sent: Sunday, April 30, 2023 11:55 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2023 Agenda Item Thursday 9a - Permit Amendment No. 2-15-1357-A2 (San Francisco Public Utilities Commission Armoring, Ocean Beach)

Commissioners,

I support the one year extension of temporary protection measures at South Ocean Beach, as it is the only reasonable thing to do. In fact, it seems that it should be granted by the Commission without having to go through this whole process. I would like to comment on the new Draft EIR for this area because it is so different than the plan that was approved by the City of San Francisco in 2017.

I have been surfing and hiking at Ocean Beach for almost 60 years and driving on the Great Highway for 56 years. Back then the beach was wide enough and uncrowded enough that I could ride my motorbike on the beach. It was I that alerted DPW in 2009 that the edge of the roadway had fallen onto the beach. The director of DPW did not believe me until I sent him a picture. The next day they sent out an engineer and the road was closed until the rock revetment was placed in 2010.

Since then, the beach south of the revetment has seen a steady loss of sand but the beach to the north of the revetments has remained relatively stable. While the bluff adjacent to the revetment has retreated roughly ten yards since the revetment was placed, the bulk of the loss of beach sand started about one mile south of the revetment and gradually worked its way northward. There has been so much loss of sand that for the last several years there has been no dry beach south of the revetment at high tide in the winter. As a result, the bluffs now have been sliding down onto the beach. One such landslide killed a young woman a couple of years ago. Based on my observations, I have concluded that the removal of the existing revetments, allowing the shoreline to recede, will allow the massive loss of beach sand to advance northward, causing the sandy beaches north of the project to disappear at high tide in the winter.

The large placement of sand by the Army Corps in 2021 will not last for five years. With the return of El Nino, I doubt that it will last for more than one more year. So, if the ultimate goal is to preserve the sandy beach in this area, the removal of the revetments will require much more sand replenishment than if the revetments are allowed to remain.

Now since the Commission has demanded that the revetment must be removed and replaced with softer protective structures, I wonder how the Commission could ever approve the new Draft EIR plan that the City is designing. As you know, the new plan calls for a massive concrete structure consisting of a low seawall topped by concrete steps all the way to the top of the bluff. The concrete steps will be covered with soil, but it will require expensive maintenance to keep that soil in place. When that soil erodes away there will be a giant seawall right on the beach. How is that an improvement over the existing revetment? The cure is worse than the disease.

The plan from 2017 called for a low seawall to protect the sewer pipe under the Great Highway covered with cobblestones with regular sand nourishment on top of that. However, that softer contour would provide little protection for the bluff that the Treatment Plant sits on, hence the giant seawall. I urge you to consider allowing the existing revetments to remain covered by cobblestones at their seaward edge. The cobblestones would allow for less loss of sand during the winter storms and facilitate more natural sand replenishment in spring and summer.

It seems entirely unreasonable to require the City to spend hundreds of millions of dollars to implement a plan that will result in a net loss of dry beach and that will be rendered moot in the coming decades by the inevitable rise in sea level. Unfortunately, in one hundred years or less, no matter what you do, dry sandy beaches will be very rare in California. I believe that the mission of the Coastal Commission will change from trying to maintain beaches to deciding which coastal land can be protected at any cost and which lands must be allowed to be inundated.

Thank you for your consideration,
Dennis Holl

KoppmanNorton, Julia@Coastal

From: Jason Jungreis <jasonjungreis@gmail.com>
Sent: Sunday, April 30, 2023 12:10 AM
To: NorthCentralCoast@Coastal
Subject: re May 11 #9 re SF Ocean Beach revetment -- not only do I favor this action, but I favor nourishment and revetment for decades to come and keeping Ocean Highway

Please register and circulate this comment re re May 11 #9 re SF Ocean Beach revetment.

Not only do I favor this action, but I favor nourishment and revetment for decades to come and keeping Ocean Highway. This natural scouring process is manageable, and readily treated with little disruption or cost or environmental impact by sluicing sand in a pipeline from the northern part of Ocean Beach. There is no reason to think that a managed retreat makes sense, given the necessary human interaction with the area.

Thanks.

Jason Jungreis
527 47th Avenue
San Francisco, CA 94121

KoppmanNorton, Julia@Coastal

From: Bill McLaughlin <local415@gmail.com>
Sent: Friday, May 5, 2023 4:57 PM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2023 Agenda Item Thursday 9a - Permit Amendment No. 2-15-1357-A2 (San Francisco Public Utilities Commission Armoring, Ocean Beach)

Dear Commissioners,

I reluctantly support the passage of this amended CDP.

In July 2011, the Coastal Commission rejected a conventional seawall proposal for South Ocean Beach. In a unanimous vote, Commissioners requested that SFPUC work the public and other stakeholders to come up with a more beach friendly plan for infrastructure protection. I was the Surfrider Foundation representative in that stakeholder effort what was known as the Ocean Beach Master Plan.

After more than a decade of studies, meetings, a special LCP amendment, and a now draft EIR, we are finally nearing an end to this journey.

The final project CDP is very late, no doubt. However, what I have seen so far in the draft EIR has been very troubling. What is being proposed is very large concrete seawall structure with a major reliance on sand replenishment. There is very little if any living shoreline component, and inadequate public parking access. I support this CDP extension, though, honestly, if we are still looking at the Draft EIR design, there should be for more time allotted.

Going forward, I urge local Commission staff to continue its work with SFPUC to ensure the Phase II project for long-term erosion control is indeed beach friendly. I and other stakeholders want this issue resolved, but in a way that honors the intent of the July 2011 Commission, the vision of the Ocean Beach Master Plan, as well as the Commission's latest sea level rise guidance for public infrastructure in hazard zones.

Thank you.

Sincerely,

Bill McLaughlin
Surfrider Foundation Member/Activist
Stakeholder Rep. Ocean Beach Master Plan