

CALIFORNIA COASTAL COMMISSION

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Th9a

LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

May 8, 2025

CORRESPONDENCE

COUNTY OF SAN MATEO
BOARD OF SUPERVISORS

Ray Mueller
Board of Supervisors, Third District

County Government Center
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Redwood City, CA 94063
650-363-4569

May 1, 2025

California Coastal Commission
Attn: Executive Staff
455 Market Street, Suite 300
San Francisco, CA 94105

Re: Support for Item #Th9a (City of Pacifica LCP Amendment #LCP-2-PAC-23-0056-3)

To Whom It May Concern:

I write to support the California Coastal Commission's staff recommendation to support, as submitted, agenda Item **#Th9a: City of Pacifica Local Coastal Program Amendment Number LCP-2-PAC-23-0056-3**. This recommendation represents the culmination of years of coastal adaptation planning, significant community engagement and months of collaboration between the city of Pacifica and Coastal Commission staff.

The proposal represents a balanced approach to addressing the needs of residents and visitors, ensuring conservation of resources, preparing for wildfire and climate change hazards, and comprehensively mitigating for a changing environmental landscape. It considers the complexities of coastal land use planning, laws, and regulations, and aligns our shared values with those of the California Coastal Act.

As the County Supervisor representing the entirety of the San Mateo County coastline including the city of Pacifica, I strongly support this update to the Pacifica's Local Coastal Land Use Plan and urge the California Coastal Commission to vote to adopt to the Plan as submitted.

Sincerely,



Ray Mueller
Supervisor, Third District
County of San Mateo





DAVID J. CANEPA
SUPERVISOR, FIFTH DISTRICT
COUNTY OF SAN MATEO

April 29, 2025

California Coastal Commission
455 Market Street, Suite 228
San Francisco, CA 94105

RE: Support for North Coast County Water District's Position on Critical Infrastructure and Coastal Resiliency

Dear Chair Cummings and Honorable Commissioners,

I write to express my strong support for the position of the North Coast County Water District regarding the protection of critical public infrastructure in coastal communities like Pacifica. San Mateo County is uniquely vulnerable to the impacts of sea level rise and coastal erosion.

As we work together to confront these challenges, I want to commend the Coastal Commission for its leadership and foresight in issuing the 2021 Final Adopted Guidance document, *Critical Infrastructure at Risk*. This document appropriately recognizes the unique and pressing challenges that critical infrastructure poses in the face of climate change and outlines a path that allows for shoreline armoring, when consistent with the Coastal Act, as a reasonable short- to mid-term adaptation strategy.

We urge the Commission to continue embracing this balanced, context-specific approach as it applies the Coastal Act's provisions to infrastructure that is essential to public health and safety. In many cases, requiring immediate relocation of infrastructure is not feasible and can create significant financial hardship for the ratepayers in working-class communities like Pacifica.

The North Coast County Water District plays a vital role in providing water for domestic, commercial, public, and fire protection purposes. The District is already confronting the immense task of maintaining and upgrading aging infrastructure. Ensuring that water tanks, pipelines, and pump stations can continue to deliver reliable service—including fire suppression—must remain a top priority. For the sake of affordability, safety, and resilience, it may be both reasonable and necessary to protect some infrastructure in place over the short to medium term, especially where such protection aligns with the overarching goals of the Coastal Act.

We also support the Commission's commitment to ensuring that new development, including new critical infrastructure, is designed and sited in a manner that avoids the need for shoreline armoring. However, existing infrastructure in coastal hazard zones deserves careful, case-by-case consideration and flexible solutions that do not unduly burden the communities they serve. The District is asking that Pacifica's Local Coastal Land Use Plan expressly include references to the Coastal Act's balancing test, which could be applied when considering a variety of factors when critical public infrastructure is at risk due to erosion or sea level rise.

In friendship,

DAVID J. CANEPA

President, San Mateo County Board of Supervisors

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15TH DISTRICT, CALIFORNIA

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COMMITTEE ON SCIENCE, SPACE,
AND TECHNOLOGY
SUBCOMMITTEE ON RESEARCH AND TECHNOLOGY
SUBCOMMITTEE ON INVESTIGATIONS AND OVERSIGHT

May 2, 2025

California Coastal Commission
Attn: Executive Staff
455 Market Street, Suite 300
San Francisco, CA 94105

Re: Support for Item #Th8a (City of Pacifica LCP Amendment #LCP-2-PAC-23-0056-3)

Dear Commissioners,

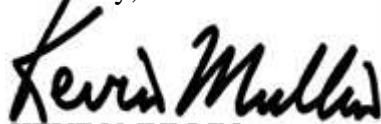
I write in strong support of the California Coastal Commission staff's recommendation to support, as submitted, agenda Item **#Th9a: City of Pacifica Local Coastal Program Amendment Number LCP-2-PAC-23-0056-3**. This recommendation represents the culmination of years of coastal adaptation planning, significant community engagement and months of collaboration between the City of Pacifica and Coastal Commission staff.

While I no longer represent Pacifica, I am taking the unusual step in advocating for this item as I had the privilege of representing Pacifica during my decade serving in the California State Assembly. I am very familiar with the challenges Pacifica faces, and the arduous process of community engagement and internal and external alignment required through over a dozen years of changes on the city council, and staff transitions both for the city and the Commission. My staff and I engaged directly on numerous occasions on behalf of Pacifica, including hosting the then Executive Director and Commission staff in my office in 2018 for a frank conversation about Pacifica's LCP.

I am pleased the proposal represents a balanced approach to address the needs of residents and visitors, ensures conservation of resources, prepares for wildfire and climate change hazards, and comprehensively mitigates for a changing environmental landscape. The proposed LCP considers the complexities of coastal land use planning, laws, and regulations, and aligns values with those of the California Coastal Act.

Thank you for your full and fair consideration of Pacifica's Local Coastal Land Use Plan in accordance with all applicable laws and regulations.

Sincerely,



KEVIN MULLIN
Member of Congress



Jackie Speier
County Supervisor

May 2, 2025

California Coastal Commission
Attn: Executive Staff
455 Market Street, Suite 300
San Francisco, CA 94105

Re: Support for Item #Th9a (City of Pacifica LCP Amendment #LCP-2-PAC-23-0056-3)

To Whom It May Concern:

I write to support the California Coastal Commission's staff recommendation to support, as submitted, agenda Item **#Th9a: City of Pacifica Local Coastal Program Amendment Number LCP-2-PAC-23-0056-3**. This recommendation represents the culmination of years of coastal adaptation planning, significant community engagement and months of collaboration between the city of Pacifica and Coastal Commission staff.

The proposal represents a balanced approach to addressing the needs of residents and visitors, ensuring conservation of resources, preparing for wildfire and climate change hazards, and comprehensively mitigating for a changing environmental landscape. It considers the complexities of coastal land use planning, laws, and regulations, and aligns our shared values with those of the California Coastal Act.

As San Mateo County Supervisor for District 1, I strongly support this update to the Pacifica's Local Coastal Land Use Plan and urge the California Coastal Commission to vote to adopt to the Plan as submitted.

All the best,

A handwritten signature in blue ink that reads "Jackie Speier".

Jackie Speier



May 2, 2025

To: Justin Cummings, Chair, California Coastal Commission
Cc: Kate Huckelbridge, Executive Director, California Coastal Commission
Stephanie Rexing, District Manager, California Coastal Commission
Oceane Ringuette, District Supervisor, California Coastal Commission

Re: Pacifica LCP Update and Special Shoreline Resiliency Areas (SSRAs)

The Surfrider Foundation submits these comments regarding the City of Pacifica's Local Coastal Program Land Use Plan (LUP) update, with particular concern for and strong opposition to the proposed Special Shoreline Resiliency Areas (SSRAs), which would pave the way for neighborhood-scale seawalls, and their broader implications. Surfrider has received support preparing these comments from the UCLA Frank G. Wells Environmental Law Clinic.

The LUP is Inconsistent with Coastal Act Protections

As it stands, the LUP reflects a policy approach that privileges discretionary permitting and private property concerns over public trust protections and climate-responsive coastal planning. While the LUP incorporates some Coastal Commission suggested modification from the 2024 draft, the updated LUP ultimately still weakens protective standards through flexible language, permits ongoing armoring in SSRAs without meaningful limits, and retreats from tools that previously allowed for consideration of managed retreat.

Pacifica's most erosion-prone beaches, including Rockaway Beach and West Sharp Park, are at risk of permanent loss due to the failure of the LUP to implement effective adaptation policies. This letter details where and how the LUP diverges from the letter and intent of the Coastal Act and longstanding regulatory approaches.

The Coastal Act Prioritizes Protection of Significant Coastal Resources and the Grants the Commission Broad Authority to Deny Seawalls The Coastal Act as a whole disfavors armoring, in favor of protecting the ecological balance of the coastal zone. Courts have emphasized that "the permanent protection of the state's natural and scenic resources is a paramount concern." (San Diego Unified Port Dist. v. California Coastal Com., 238 Cal. Rptr. 3d 671, 684 (Cal. App. 4 Dist., 2018). Existing developed uses and future developments are required to be carefully planned, consistent with the policies of this division. As such, any new development actions must comport with the need to protect the natural resources of the coastline, not to harm it.

The California Coastal Act grants broad authority to the government to protect California's coastlines and to regulate shoreline protection structures. According to the California Supreme Court, the local plans and development permits issued at a local level are "not solely a matter of local law but embody state policy" and "a fundamental purpose of the Coastal Act is to ensure that state policies prevail over the concerns of local government." (*Pac. Palisades Bowl Mobile Ests., LLC v. City of Los Angeles*, 55 Cal. 4th 783, 794. (2012)). Together, Coastal Act sections 30253 and 30235 work together to ensure broad protection of coastal resources from the harms of shoreline armoring in particular. Section 30235 requires the Commission to permit armoring only when "*when required to serve coastal-dependent uses or to protect existing structures or public beaches in danger from erosion and when designed to eliminate or mitigate adverse impacts on local shoreline sand supply*" (emphasis added). Meanwhile, Section 30253 requires that new development neither "create nor contribute significantly to erosion, geologic instability, or destruction of the site or surrounding area *or in any way require the construction of protective devices that would substantially alter natural landforms along bluffs and cliffs*" (emphasis added).

Courts have confirmed the Commission's authority to place reasonable conditions on the use of property, including denying seawalls for new development under the Coastal Act and requiring mitigating permit conditions for seawalls that protect existing development. (*Nollan v. Cal. Coastal Comm'n*, 483 U.S. 825, 833-834 (1987); *Dolan v. City of Tigard*, 512 U.S. 374 (1994); *Koontz v. St. Johns River Water Mgmt. Dist.*, 133 S. Ct. 2586 (U.S. 2013); *Lynch v. California Coastal Com.*, 3 Cal. 5th 470, 396 P.3d 1085 (2017)). In *Scott v. City of Del Mar*, the court upheld the city-ordered removal of seawalls because the seawalls, which encroached onto a public right-of-way, were considered a public nuisance. In *Lindstrom v. California Coastal Commission*, the court upheld almost all conditions imposed on a private property owner's permit for a blufftop home, including finding the waiver of any future right to build a seawall. These decisions illustrate the Commission's broad authority to deny seawall permits under both existing legislation and the public trust doctrine, in line with its duty to preserve public trust resources.

Applying armoring along the coast necessarily harms the ecological balance of the shoreline and can prevent future public use. SSRAs which evade the important Coastal Act considerations are inconsistent with both the statute and case law.

SSRAs: A Codification of Armoring at the Expense of the Coast

The SSRA framework introduced in Chapter 6 of the LUP (p. 6-29) designates Rockaway Beach and West Sharp Park as areas where shoreline armoring can continue regardless of whether the protected structures would otherwise be legally entitled to armoring. In other words, it allows new development to rely on armoring. The LUP describes SSRAs as planning tools for public infrastructure resilience, but they functionally legitimize long-term armoring, undermining the Coastal Act's core requirements to minimize adverse impacts to coastal resources, public access, and natural shoreline processes.

The SSRAs lack defined triggers, timeframes, or effective mitigation requirements. The LUP presents no meaningful commitment to phasing out armoring or transitioning to non-structural solutions over time. The Beach Boulevard Infrastructure Resiliency Project is positioned as a flagship model, yet the LUP fails to analyze its potential to exacerbate erosion, reduce sand supply, or narrow beaches. This use of infrastructure as justification for new and expanded seawalls directly contravenes Coastal Act Sections 30210, 30211, and 30235.

This policy choice is especially troubling in light of case law interpreting Section 30235. For example, in *Beach and Bluff Conservancy v. City of Solana Beach* (2012), the Coastal Commission affirmed that even for existing development, armoring must be the least environmentally damaging alternative and cannot be applied indiscriminately. The Pacifica LUP's blanket allowances in SSRAs fail this test.

Surfrider is gravely concerned with this assertion in the staff report: "This proposal represents the first of what staff expects to be many LCP amendment applications that provide for clearly developed neighborhood-scale adaptation planning provisions, which in some cases will include focused areas where *temporary armoring could be allowed even where the Coastal Act may direct otherwise*, provided that the facts and context for such amendments demonstrate that such allowance is the most protective of significant coastal resources." (emphasis added). Further, "staff notes that this approach allows local governments – and the Commission – to address the reality of existing and expected future coastal hazards as well as to develop forward-looking sea level rise adaptation strategies to protect coastal resources over time in communities that are already substantially developed to the shoreline edge, and in many cases heavily armored." Rather than developing strategies "over time," Surfrider implores the Commission to require strict adherence to the Coastal Act *now*, and require forward-looking sea level rise adaptation strategies in Pacifica's LUP *now* - not SSRAs that would allow flouting Coastal Act limitations on harmful coastal armoring. The SSRAs create a harmful loophole to the Act's armoring limitations, and as staff recognize, are likely to create a significant, harmful precedent along California's coast.

Moreover, the SSRA policies contravene the Commission's Local Coastal Program Update Guide, which recognizes that "shoreline protective devices can have significant adverse impacts to coastal resources" and that "shoreline protective devices should only be allowed in limited situations (e.g. to protect existing structures) and when no other feasible alternative exists, as prescribed in Coastal Act Sections 30235 and 30253." (LCP Update Guide, Section 8, *available at*:

https://documents.coastal.ca.gov/assets/lcp/LPUUpdate/REVISED_DRAFT_LUP%20Guide_Update_8_Hazards_%20Feb_14_2016.pdf)

Section CR-I-44 of Pacifica's Local Coastal Land Use Plan (LUP) is Insufficient to Counter Special Shoreline Resilience Areas (SSRAs) Impacts

The language in the Coastal Access and Resilience Program (“Resilience Program”), section CR-I-44 of the Pacifica LUP, could allow for unwarranted use of shoreline protection structures. In addition to containing ambiguous and unclear language, the Resilience Program may violate the Coastal Act. The SSRAs that the Resilience Program aims to mitigate are governed by policies CR-I-38, CR-I-39, and CR-I-40, which allow for armoring in situations that would contravene the Coastal Act as interpreted in *Casa Mira Homeowners Assn. v. California Coastal Com.*, 107 Cal.App.5th 370 (Cal.App. 1 Dist., 2024). In *Casa Mira*, the court held that “existing structures” that are allowed to be protected by coastal armoring must have existed before the Coastal Act’s effective date of January 1, 1977. Because policies CR-I-38, CR-I-39, and CR-I-40 allow for armoring of public infrastructure that may not have existed before 1977, they may allow for violations of the Coastal Act.

In general, the language of CR-I-44 reflects a permissive approach to coastal access and preservation, rather than the mandatory obligations set forth by the Coastal Act. Bullet point one of the Resilience Program proposes opportunities that “can help” maximize access to the coast. The list of possible—but not required—projects include the removal of existing armoring, nature-based adaptation, and beach nourishment. No matter how thoughtful for how many, possible projects cannot compensate for the approval of new armoring permits and the failure to prioritize the removal of coastal armoring. The LUP, in effect, assures that armoring will continue but does not ensure implementation of beach preservation projects. The Resilience Program as presented in the latest LUP does not sufficiently counter SSRA impacts, and the LUP contravenes Coastal Act protections, such as Section 30001.5, which generally requires maximizing public access to and along the coast and maximizing public recreational access.”

Policies CR-I-38, CR-I-39, and CR-I-40 describe permitting the use and maintenance of “existing shoreline protection structures.” The policies reference allowing existing shoreline protection structures, pursuant to Section 30235 of the Coastal Act. Section 30235 refers to structures that existed at the time the Coastal Act was enacted in 1977—not structures in existence at the time the LUP is adopted. See *Casa Mira* at 3 (concluding that “existing structures” in context, means structures that existed before the Coastal Act’s effective date”). While maintaining shoreline protection structures for development that existed prior to 1977 is permissible, the Act does not allow shoreline protection structures for new development after 1977 that would substantially alter natural landforms along bluffs and cliffs.

Policies CR-I-38 and CR-I-39 state that public infrastructure including roads, sidewalks, parking areas, accessways, and water sewers may rely on a shoreline protection structure that is existing at the time of the (permit) application. While *Casa Mira* concerned a seawall permit for a condominium complex, it did not make explicit carveouts for public infrastructure. Because the policies do not mention whether the public infrastructure in question aligns with the *Casa Mira* requirements, it is unclear whether blanket approval of maintenance for shoreline protection structures existing at the time of application are warranted. As the basis for the Resilience Program, policies CR-I-38, CR-I-39, and CR-I-40 do not necessarily align with the Coastal Act and must therefore be revisited to ensure long term protection of the coast irrespective of political pressures.

The Coastal Act's Conflict Resolution Provisions Favor Protection of Coastal Resources Over Armoring

In Coastal Act Section 30007.5 the legislature clearly recognized that in carrying out the Coastal Act, potential conflicts be resolved in a manner which on balance is the *most protective of significant coastal resources*. The staff report claims, "In a manner that might seem counterintuitive, the Coastal Act's structure and posture related to being generally anti-armoring can actually serve to thwart the mandate to protect the water quality and marine resources in areas seaward of these aged armoring structures when the Section 30235 override criteria are not met." However, this is a gross misrepresentation and ignores the fact that cities can and should be working toward long term solutions that are consistent with every aspect of the Coastal Act. Coastal cities should be working toward long term solutions like relocating public infrastructure away from hazardous areas. It is possible to pursue solutions that both protect coasts from armoring, as well as public infrastructure and water quality, and the Coastal Act's conflict resolution provision must not be abused in a manner that precludes local governments from advancing such needed solutions. The conflict resolution provisions must not be applied to approve Pacifica's proposed SSRAs.

Legal Concerns with Discretionary Permitting and Precedent

Multiple provisions in the LUP shift land use decisions toward individualized permitting that circumvents uniform LCP application. New policy LD-I-5 (p. 2-14) introduces "property-specific determinations" in coastal permit decisions, undercutting the predictability and enforceability of the LUP. This invites ad hoc interpretations and weakens the foundation for Commission oversight.

The removal of the Hillside Preservation District overlay (p. 2-24) and deletion of explicit CDP requirements further illustrate this erosion of regulatory consistency. Even core policies such as LD-I-28 (Public Services Priorities, p. 2-39) are rewritten to promote infrastructure expansion into hazardous areas, contingent only on a "no feasible alternative" finding.

Such permissive language invites legal ambiguity and undermines the Coastal Act's directive for comprehensive, enforceable planning. By allowing wide discretion to city decision-makers, the LUP fosters inconsistent outcomes and makes it more difficult to challenge future development approvals that may violate the Coastal Act.

Managed Retreat: Dismantled by Design

The LUP eliminates or weakens every provision that previously supported managed retreat. Key omissions and regressions include:

- The removal of infrastructure capacity limits to constrain new development (p. 2-38)
- The elimination of policies tying new development to hazard avoidance for the full lifespan of structures (Chapter 6)

- The revision of NH-I-29 to permit critical infrastructure in the Coastal Vulnerability Zone (CVZ), with vague siting criteria (p. 5-19)

Instead, the LUP relies on vague language around adaptation planning while reserving armoring as a default solution, even in high-risk zones. The new emergency armoring provision (p. 6-23) fails to define what constitutes an emergency, leaving this pathway open to abuse.

This shift mirrors a broader trend in California coastal cities where explicit reference to retreat is politically unpalatable, but the absence of even implicit retreat options results in plans that are not compliant with best available science or the Coastal Act.

While CR-I-45 (Coastal Hazards Risk Disclosure) strengthens deed acknowledgment requirements, it does not substitute for actual policies guiding relocation, buyouts, or removal. Surfrider maintains that managed retreat must remain a viable, if difficult, policy tool, one that is entirely absent from the submitted LUP.

Environmental Justice and Public Trust Concerns

These regulatory shifts exacerbate environmental injustice. Sharp Park and Rockaway serve racially and economically diverse populations, many of whom depend on public beach access. The current pattern of armoring already constrains lateral access and recreation. The SSRAs will worsen this inequity by further narrowing public beaches to protect private property.

The updated LUP eliminates language calling for public acquisition of vulnerable coastal parcels and weakens coastal access protections in areas like Rockaway Headlands (p. 3-21). Meanwhile, erosion control policies now allow aggressive sediment relocation without prior environmental evaluation (p. 4-12).

Additionally, the LUP strikes language requiring tribal consultation in areas of cultural significance (p. 4-35). This omission reflects a broader trend of deprioritizing procedural justice for historically marginalized groups. These decisions contradict the spirit of California's environmental justice goals as reflected in AB 1287 and Executive Order N-82-20.

Statewide Precedent and Legal Ramifications

The LUP sets a dangerous precedent for other communities. Pacifica's approach is being closely watched by other jurisdictions navigating sea level rise planning. If approved, the SSRAs could become a template for neighborhood-scale exemptions from Coastal Act regulations.. This risks fragmentation of statewide coastal policy and increases litigation vulnerability.

Similar concerns are emerging in Ventura, Santa Cruz, and Big Sur, where communities face pressure to allow more flexible adaptation options. Without strong Commission action, Pacifica's LUP could tip the scales toward short-term solutions that sacrifice public beaches.

Recommendations

In light of these findings, Surfrider urges the Commission to:

1. Reject the SSRA policies.
2. Restore infrastructure-based limits on development in hazard zones, tied to capacity and long-term resilience.
3. Prohibit shoreline armoring in residential areas of the CVZ and clarify emergency permitting standards.
4. Reinstate adaptive relocation provisions through bluff setbacks, infrastructure siting restrictions, and policies discouraging reinvestment in high-risk areas.
5. Require a revised cost-benefit analysis that incorporates sand supply, beach use value, climate equity, and public access losses.
6. Restore mandatory tribal consultation language and ensure culturally sensitive coastal zones are protected.

The Pacifica LUP presents a mixed picture: some improvements, but too many concessions that weaken the Coastal Act's intent. By embedding flexible language, expanding armoring allowances, and dismantling tools for long-term adaptation, the plan endangers beaches, public access, and the integrity of the statewide LCP framework.

Surfrider urges the Commission to require substantial modifications in order to bring Pacifica's LUP into compliance with the Coastal Act. The coast deserves a plan that faces the future with resiliency, equity, and scientific integrity.

Sincerely,

Staley Prom
Senior Legal Associate
Surfrider Foundation

Mandy Sackett
California Policy Manager
Surfrider Foundation

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April 23, 2025

SENT VIA EMAIL

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

RE: City of Pacifica Local Coastal Land Use Plan - Number LCP-2-PAC-23-0056-3

Dear Honorable Commissioners,

The protection of essential and critical public infrastructure, such as water distribution and sewer collection/treatment facilities, from the effects of climate change, including sea level rise and coastal erosion, is vital to human health and safety. It is also essential to ensure that North Coast County Water District (District) customers receive critical services at reasonable prices.

The District's mission is to serve our customers by delivering a sufficient quantity of high quality water in the most cost-effective, reliable, and environmentally sensitive manner. This includes providing water during emergencies for fire suppression. We take this mission very seriously, and in light of the recent fires in Southern California, it is more critical than ever to ensure that all of the District's infrastructure is maintained and ready to serve the community.

A recent interpretation by a California Appellate Court of the Coastal Act has established that different levels of protection of facilities constructed before and after 1976. For facilities built after 1976, seawalls, revetments, and other defensive measures will only be allowed in limited circumstances, e.g. under the Coastal Act's balancing test.

The City of Pacifica's Local Coastal Land Use Plan (LCLUP) includes a few provisions that mention critical infrastructure, and the City of Pacifica has stated that these provisions adequately address the protection of critical public infrastructure. However, the District believes that the LCLUP should expressly include references to the Coastal Act's balancing test, which the Coastal Commission could apply when considering a variety of factors when critical public infrastructure is at risk due to coastal erosion or sea level rise. Specifically, the District requests that the following sentence be included in the City of Pacifica's LCLUP: "Shoreline protection structures for critical public infrastructure may be allowed to the extent that they satisfy the applicable balancing tests set forth in the Coastal Act."

The District acknowledges that it is within the discretion of the Coastal Commission to apply the Coastal Act's balancing test, which has become more important for critical public infrastructure built after 1976.

The Coastal Commission has recognized that critical infrastructure, including water and sewer facilities, is unique and presents specific challenges with climate change, as outlined in its 2021 Final Adopted Guidance document "Critical Infrastructure at Risk." In this guidance, the Coastal Commission recognizes that armoring may be allowed to protect critical infrastructure and may be a reasonable short to mid-term adaptation strategy as long as it is consistent with the Coastal Act.

The District urges the Coastal Commission to continue to recognize the importance of critical public infrastructure when applying the Coastal Act balancing test. In many situations, it is crucial to protect that critical infrastructure in place for a period of time instead of requiring it be relocated when it risks damage due to coastal erosion or sea level rise.

The District hopes that the Coastal Commission understands that the high costs associated with replacing and relocating critical infrastructure can place an undue burden on the ratepayers of our community. The District provides water for essential domestic, commercial, public and fire service uses, and is already facing a considerable amount of work to replace or upgrade the existing, aging water infrastructure. One of our most pressing concerns is to make sure that our water tanks, pipelines and pump stations can provide essential fire suppression services to the community. To continue supplying water at reasonable rates to all customers, it may be necessary to protect some critical public infrastructure in place for a period of time, which in some circumstances would be consistent with coastal resource protection.

The District supports the Coastal Commission objective that new development, even critical public infrastructure, should not require protective devices that would substantially alter the shoreline.

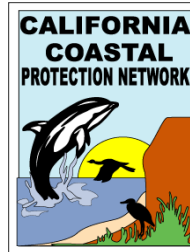
Sincerely,



Ron Ash, President
Board of Directors

CC:

Kate Hucklebridge, Executive Director
Congressman Sam Liccardo
State Senator Josh Becker
Assemblymember Marc Berman
Supervisor Ray Mueller
Supervisor David Canepa
Pacifica City Council
Kevin Woodhouse, City Manager
NCCWD Board of Directors



May 2, 2025

To: Justin Cummings, Chair, California Coastal Commission
Cc: Kate Huckelbridge, Executive Director, California Coastal Commission
Stephanie Rexing, District Manager, California Coastal Commission
Oceane Ringuette, District Supervisor, California Coastal Commission

Re: Neighborhood-Scale Adaptation Policies & Pacifica's LCLUP

Dear Chair Cummings and Commissioners,

We, the undersigned organizations, strongly oppose the Special Shoreline Resiliency Areas (SSRAs) proposed in Pacifica's Local Coastal Land Use Plan (LCLUP). As currently drafted, the plan would open the door to neighborhood-scale seawalls at Rockaway Beach and West Sharp Park, setting a dangerous precedent for local governments across California seeking to justify coastal armoring that undermines the Coastal Act and public trust protections.

This proposal not only threatens to perpetuate seawalls on critical sections of Pacifica's shoreline but also signals to other jurisdictions that they, too, can authorize shoreline armoring on a broad scale without appropriate mitigation, environmental analysis, or regard for long-standing legal requirements. If adopted, Pacifica's SSRA framework would normalize blanket

armoring policies under the guise of “coastal adaptation,” accelerating beach loss and access inequities throughout the state.

Special Shoreline Resiliency Areas

Pacifica’s draft LCLUP introduces SSRAs that would enable large-scale seawalls fronting entire neighborhoods, despite the known impacts of shoreline armoring on public beaches, access, recreation, and coastal ecosystems. If the Commission allows policies like SSRAs to proceed, it would signal statewide permission for neighborhood-scale seawalls, creating a dangerous precedent that accelerates beach loss, degrades public trust lands, and favors private interests over public benefit.

In Pacifica, the proposed SSRA policy would authorize large-scale seawalls along the neighborhoods of Rockaway Beach and West Sharp Park. At Rockaway, the community has already seen wave quality decline due to armoring. Anecdotally, historic surf spots like “Rocky’s” have suffered, and beach width continues to narrow, impeding both recreational use and public safety. The SSRA proposal threatens to cement this loss by prioritizing seawalls for redevelopment without directly addressing the cumulative effects on sand supply, surf breaks, and shoreline access.

In Sharp Park, the City’s Specific Plan proposes a surge of new development, including commercial and residential uses, in an area known for severe erosion and flooding. Rather than guiding this area toward long-term resiliency, the SSRA framework would allow shoreline armoring to facilitate and protect intensified use in a hazardous zone. Meanwhile, neighborhoods just outside the SSRA boundaries, such as Esplanade, West Fairway Park, and Shoreview, are left behind, receiving no guaranteed protection or planning support. Residents in these areas have expressed deep concern about the unfairness of the policy and the potential for widespread erosion impacts as armoring diverts wave energy elsewhere.

This selective approach to shoreline protection creates legal and ethical concerns and puts entire sections of Pacifica’s coast, and coast-adjacent communities, at greater risk. Instead of fostering collective resilience, the SSRA policy creates fragmentation, inequity, and further environmental degradation.

Neighborhood-scale seawalls disproportionately harm frontline communities by degrading public access and destroying recreational and cultural spaces. The coastal armoring at Sharp Park has already eliminated meaningful access to the beach for miles, disproportionately affecting nearby lower-income and BIPOC communities who rely on public coastal spaces. As climate adaptation unfolds, equity must be front and center, not an afterthought.

Coastal Act & Public Trust Violations

Beyond coastal access and equity concerns, the SSRAs contradict the Coastal Act. Every relevant policy, from Sections 30210 and 30220 (access and recreation) to 30251 (visual quality), strongly militates against seawalls, with the lone exception of Section 30235. Yet 30235

only permits armoring for existing structures—per *Casa Mira Homeowners Association v. California Coastal Commission*, those that were built before the Coastal Act took effect in 1977—in danger, not new development or wholesale neighborhood zones. The Coastal Act's conflict resolution clauses counsel protection of coastal resources and, beyond that, cannot legally justify neighborhood-scale armoring absent a true policy conflict, which does not exist here.

Moreover, the Commission has an affirmative duty to protect the public trust. Blanket seawall policies violate this duty by precluding both horizontal and vertical beach access, fixing the shoreline, and damaging trust resources. The Commission must make public trust findings for all shoreline development and reject LCP policies that fail to do so.

The SSRAs in Pacifica are not isolated. Local governments in Ventura, Santa Cruz, and beyond are watching closely. If the Commission approves neighborhood-scale seawalls in Pacifica, it will embolden other jurisdictions to insert similar carve-outs in their LCPs. This piecemeal erosion of the Coastal Act under the guise of regional adaptation would have devastating consequences for California's iconic coast.

Our Request

We urge the Commission to:

- Reject Pacifica's SSRA policy as currently drafted;
- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
- Require meaningful, site-based mitigation for any shoreline protection proposal;
- Prioritize nature-based solutions and adaptive realignment of infrastructure.

The future of California's public beaches, waves, and coastal communities depends on bold, principled action. We call on the Commission to stand firm in its legal mandates and set a statewide standard that favors access, equity, and ecological resilience.

Sincerely,

Mandy Sackett
California Policy Manager
Surfrider Foundation

Molly Culton
Chapter Organizing Manager
Sierra Club CA

Adriana Dominique Guerrero- Nardone
Executive Director
Salted Roots

Lexi Mendoza
Environmental Associate
Green Foothills

Susan Jordan
Executive Director
California Coastal Protection Network

Summer Lee and Peter Loeb
Co-founders
Coalition of Pacificans for an Update Plan
and Responsible Planning (CPUP)

Cindy Abbott, Roy Earnest, Margaret
Goodale, Jim Kremer
Board of Directors
Pacifica's Environmental Family

Margaret Goodale
Pacifica Shorebird Alliance

Nancy Tierney and Margo Meiman
Pacifica Climate Committee

Pam Heatherington
Board of Directors
Environmental Center of San Diego

Kristen Northrop
Legal Assistant
Coastal Environmental Law Group

John Keener
Former council member and mayor of
Pacifica

Will Cheng
Attorney

Kimberly Williams
Policy Volunteer
San Mateo County Chapter
Surfrider Foundation

Ashley Eagle-Gibbs
Executive Director
Environmental Action Committee of West
Marin



May 2, 2025

Chair Dr. Justin Cummings and Commissioners
California Coastal Commission

RE: May 8 Meeting, Agenda Item 9a: May 2025 City of Pacifica LCP Amendment Number
LCP-2-PAC-23-0056-3 (City of Pacifica LCLUP Update)

Dear Chair Cummings and Commissioners:

The Pacifica Climate Committee is a local community group focused on climate change planning, education, and advocacy. We support informed climate change planning for all of Pacifica's residents and environment. We urge the Commission to deny this Local Coastal Land Use Plan (LCLUP) update and to extend the time to amend the LCLUP update to remove the Special Shoreline Resiliency Areas (SSRAs). The City has, in general, made good progress on the LCLUP, but there are two main issues where the LCLUP fails to comply with the Coastal Act.

First, in response to political pressure from homeowners and businesses, the City of Pacifica invented two Special Shoreline Resiliency Areas for the Rockaway and West Sharp Park neighborhoods in a move intended to focus on protecting private property through armoring the built environment, instead of focusing on protection of coastal resources through nature-based solutions and public access. The SSRAs are clearly a political carve out, and per the Staff Report, are inconsistent with the Coastal Act.

SSRAs would set a disastrous precedent in promoting armoring to protect the built environment. If this is allowed, local jurisdictions could justify favorable treatment and direction of economic resources to neighborhoods with the most political power.

All of our coastal neighborhoods and residents deserve equitable treatment. For example, the area of Pacifica that is most vulnerable to future coastal hazards is the Manor neighborhood, which also has more low-income residents than either SSRA identified by City staff. A bird's-eye view of the first two (most northern) neighborhoods shown in Exhibit 2 of the Staff Report reveals many buildings on the edge of crumbling cliffs, pipes protruding from cliffsides and building debris on the beaches. The Linda Mar neighborhood has the most visitors accessing the coast and also has threatened steelhead and ESHA at San Pedro Creek.

There is no benefit to coastal resource protection and public access resulting from the City's arbitrary insistence on prioritizing future land use strategies in these two SSRAs. The LCLUP also fails to analyze hazards in the SSRAs, including how the southern half of the West Sharp Park SSRA is prone to flooding from wave overtopping. This flooding caused by wave overtopping is not reflected in a current vulnerability assessment. Intensified development in coastal hazard areas is not consistent with protection of coastal resources or public access.

Further, there is no evidence of broad public support in Pacifica for these SSRAs, yet there is broad public support for protecting our beaches. As claimed in the Commission's Staff Report, this LCLUP is not a "practical" approach, as SSRAs would create more problems than they solve and would not mitigate Pacifica's overall coastal planning concerns.

Second, the LCLUP analysis fails to adequately analyze the long-term consequences of indefinitely postponing relocation of coastal infrastructure inland. Our aging City infrastructure is in a state of continual crisis and damage from climate change induced storms and erosion, including damage to our wastewater and stormwater pipelines and pump stations, all along our coastline.

Every major storm results in expensive emergency cleanup and repair of coastal infrastructure with no long-term solution for the 100% of City residents that depend on this infrastructure. A common sight in Linda Mar during stormy weather is large diversion hoses pumping wastewater and stormwater into the ocean, just 300 feet from the world famous Pacifica Taco Bell. Wave overtopping in the southern part of the West Sharp Park neighborhood has damaged roads and flooded numerous houses and apartment buildings, as well as flooding the Brighton Pump Station.

The City's failure to prioritize and develop strategies for relocating our crucial infrastructure away from the coastal edge is a fundamental error and a disservice to Pacifica residents. The LCLUP should have policies to address infrastructure relocation.

The Staff Report summary is incorrect when it concludes that denial of the proposed SSRA provisions would leave vital public infrastructure vulnerable as this infrastructure is located all along our coastline. The SSRAs promote limited infrastructure protection instead of comprehensive infrastructure relocation planning. As discussed below, it is not feasible for the City to protect all the connected coastal infrastructure with the inclusion of the SSRAs.

Although economic resource planning is not part of the Coastal Act, we believe protection of the City's coastal infrastructure is at risk due to the City's lack of comprehensive planning and its prioritization of private property protection and SSRAs over infrastructure relocation.

The City cannot currently afford to maintain our aging coastal infrastructure and will never be able to find funding to protect *all* of Pacifica's coastal infrastructure and also fund armoring of the SSRAs. In the City's economic analysis of adaptation strategies in its 2018 Sea Level Rise Adaptation Plan, the City found that removing existing armoring and realigning infrastructure

where practical provides a net economic benefit on the order of tens of millions of dollars in some places over time.

We believe the City should provide an in-depth analysis of the estimated costs of relocating all coastal infrastructure inland versus armoring significant areas in the SSRAs. As Pacifica residents, we believe protection of coastal public infrastructure for our entire City must be prioritized before coastal private property protection.

Please reject Pacifica's LCLUP as currently drafted and extend the time to act on the LCLUP.

The public needs a LCLUP that has a practical and equitable foundation to protect all of our coastline, including public access and infrastructure, maintaining our beaches and protecting coastal resources.

Thank you for your consideration of these comments,

Pacifica Climate Committee



826 Stanyan St., San Francisco, CA 94117 • 415-290-5718 • info@sfpublicgolf.org

May 2, 2025

California Coastal Commission
Headquarters Office
455 Market St., #300
San Francisco, CA. 94105

**Re: City of Pacifica Local Coastal Program Amendment
Number LCP-2- PAC-23-0056-3 (City of Pacifica LUP Update)**

We Urge Disapproval. Among many faults, the proposed LUP Update would impose Tsunami-based Development Restrictions and Conditions that are unreasonable, vague and uncertain – while at the same time being both amateurish and drastically limiting to Pacificans’ ability to use, repair and maintain their property.

Dear Chair Dr. Cummings and Commissioners,

The Natural Hazards Section of Pacifica’s Local Coastal Land Use Plan now before Your Commission states: “Recorded tsunami run-up magnitude is generally lower at Pacifica than other locations from San Francisco to Monterey, likely due to offshore bathymetry and shoreline alterations along the city.”¹

But – strangely -- the Pacifica LUP Update now before Your Commission imposes extraordinary and serious tsunami-based development restrictions, including a waiver-of-property rights condition, on most of the property lying west of the Freeway. These are based on theoretical possibility of a once-in-975 year Tsunami occurrence or maybe 475 years or some other term (the LUP’s Glossary definition of “Tsunami Inundation Zone” at G-10 does not set a recurrence period). City Council has not made up its mind about the frequency interval), and a curious amateurish and unverifiable “Tsunami Inundation Zone” map drafted by an unnamed Planning Department “community development summer intern”. When City Council on October 28, 2024 approved submission of the LUP Update to the Commission, Council was told by City Staff that a replacement professionally-drafted map would be submitted to the Commission. No such replacement map is included in the LUP Update now

¹ City of Pacifica Local Coastal Land Use Plan, March 2025, Revised Certification Draft, Exhibit 2 to LCP-2_PAC-23-0056-3 <https://documents.coastal.ca.gov/reports/2025/5/th9a/th9a-5-2025-exhibits.pdf>, at P. 5-17 (157/235)

before Your Commission – notwithstanding Commission Staff’s assurance in the Staff Report that “the proposed LUP update includes a glossary and updated maps throughout the document.”²

All of this is described in detail, with citations to the relevant text of the LUP and to Pacifica City Council’s meetings, in our letters submitted to City Council and copied to Commission Staff (which we believe to have been copied to the Correspondence File in this matter), dated August 6, 2024³, September 9, 2024⁴, and September 25, 2024⁵, incorporated hereby and in footnotes below.

By contrast, the 2021-updated Local Coastal Plan of Pacifica’s neighboring town, Half Moon Bay, has no development restrictions on infill development, despite the fact that Half Moon Bay is one of eight California cities identified by the California Governor’s Office of Emergency Service that have incurred significant tsunami-induced property damage between 1700 and 2022.⁶ When Your Commission in April 2021 approved Half Moon Bay’s Local Coastal Plan update, finding that the Half Moon Bay Plan “conforms with the policies of Chapter 3 of the Coastal Act.”⁷ As to the Tsunami risk, the approved Half Moon Bay LCP provides:

“Mitigation of tsunami risk consists mainly of improved early warning systems and evacuation routes and information, rather than restrictions on development for infill development sites. . . . 7-9. New Development in Tsunami Inundation Zone. Limit the creation of new building sites in the tsunami inundation zone. Infill development on existing building sites may be permitted in the tsunami inundation zone, provided that a disclosure of hazard presence and a hold harmless clause indemnifying the City from any harm caused to permitted development by tsunami inundation are recorded against the property.”⁸ (emphasis added)

² CCC Staff Report, Apr. 23, 2025, re Pacifica LCP-2- PAC-23-0056-3, at page 8
<https://documents.coastal.ca.gov/reports/2025/5/Th9a/Th9a-5-2025-report.pdf>

³ Letter, SF Public Golf Alliance to Pacifica City Council, Aug. 6, 2024
https://drive.google.com/file/d/19ghnzi-ZLO6rkfzJWvD_4hwtP01iWaP/view?usp=sharing

⁴ Letter, SF Public Golf Alliance to Pacifica City Council, Sept.9, 2024
<https://drive.google.com/file/d/1vT7OYvGRI-oNllpR0Uym-MFk7dLU6eP2/view?usp=sharing>

⁵ Letter, SF Public Golf Alliance to Pacifica City Council, Sept. 15, 2024
https://drive.google.com/file/d/1KVGtsyJS2RuFSBOgKz_GUHX7-hq_t6e4/view?usp=sharing

⁶ “California Tsunami History” [poster] California Governor’s Office of Emergency Services
<https://www.conservation.ca.gov/cgs/Documents/Tsunami/california-tsunami-history-poster-a11y.pdf>:
““1946 A magnitude M8.6 Alaska/Aleutian earthquake triggered tsunami flooded portions of Half Moon Bay, CA . . . showing damage to boats and buildings”.

⁷ Half Moon Bay Local Coastal Plan, <https://documents.coastal.ca.gov/reports/2021/4/Th9a/Th9a-4-2021-exhibits.pdf>, at Exhibit 2, the Local Coastal Plan is attached as Exhibit 2 to the Coastal Commission Staff Report for the April 15, 2021 hearing: <https://documents.coastal.ca.gov/reports/2021/4/Th9a/Th9a-4-2021-report.pdf>, Resolution, at p. 4. Coastal Commission Agenda, April 15, 2021, Item No. 9a: Half Moon Bay Local Coastal Plan, Approved as Submitted: <https://www.coastal.ca.gov/meetings/agenda/#2021/4>; Minutes of April 15, 2021 CCC Meeting, at unnumbered page 8 of 17: <https://documents.coastal.ca.gov/reports/2021/6/W21/W21a-6-2021.pdf>

⁸ Half Moon Bay Local Coastal Plan, Id. <https://documents.coastal.ca.gov/reports/2021/4/Th9a/Th9a-4-2021-exhibits.pdf>, at Exhibit 2, Pg. 324/480, first full paragraph, and Pg. 326/480

Logically, Pacifica should be treated similarly to its near neighbor Half Moon Bay in the matter of Tsunami. Given the rarity of Tsunami occurrence in general and at Pacifica specifically (as the LUP itself points out, likely due in part to Pacifica's offshore bathymetry), the scale of the development restriction is way disproportional to the risk.

To help Commissioners understand the extraordinary scale of the Tsunami development restriction – virtually everything west of the Freeway in most of the Sharp Park area and virtually all of the Rockaway Beach area), we attach as Exhibit 1 detail sections from the LUP relevant maps: Figure 5-3 Flood Map and the untitled "Tsunami Inundation Zone" map, together with screenshots from an interactive topographic map showing elevations and projected tsunami flooding.

Other issues – including the issue of taking in violation property rights protections of California and US Constitutions – are raised in letters we have filed in this matter, dated May 22, 2024⁹, June 25, 2024¹⁰, July 29, 2024¹¹, October 8, 2024¹², and again October 8, 2024¹³, which we incorporate with this reference and footnote below.

CONCLUSION:

The combined unreasonableness, harshness, incompleteness, and general helter-skelteredness of the process which has led to For these reasons, the San Francisco Public Golf Alliance respectfully requests the LUP be DISAPPROVED.

Respectfully submitted

San Francisco Public Golf Alliance

Richard Harris

Richard Harris, President

Ccs: Commission Staff, Pacifica City Council and Staff, Adrienne Carr, NCCWD, Phil Ginsburg, Spencer Potter, Esq.

⁹ Letter, SF Public Golf Alliance to Pacifica City Council, May 22, 2024

https://drive.google.com/file/d/17z3O-LTYFsh1Lwtg_MKhFvC7XT8x-ef/view?usp=drive_link

¹⁰ Letter, SF Public Golf Alliance to Pacifica City Council, June 25, 2024

<https://drive.google.com/file/d/1cmSqBoq6wCgji5PSMxjyyU4thwgohFjU/view?usp=sharing>

¹¹ Letter, SF Public Golf Alliance to Pacifica City Council, July 29, 2024

https://drive.google.com/file/d/1pYy2J0WRG0ki0NJRAaLRkfZOfGnvYMQp/view?usp=drive_link

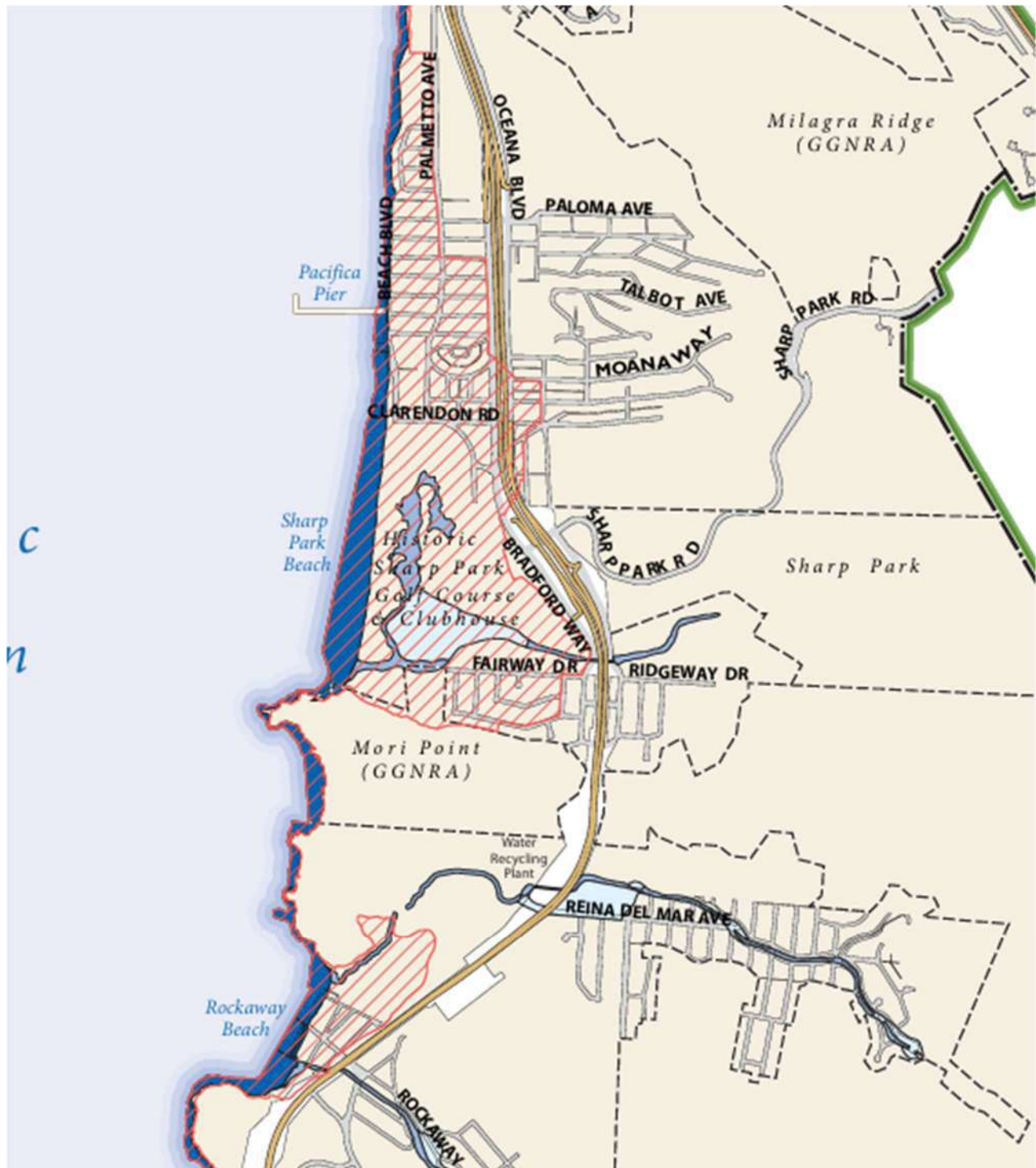
¹² Letter, SF Public Golf Alliance to Pacifica City Council, October 8, 2024

<https://drive.google.com/file/d/1QQlywEqjLPKBWDAL8Q36UKsTbiRZCkp/view?usp=sharing>

¹³ Letter, SF Public Golf Alliance to Pacifica City Council, October 8, 2024

<https://drive.google.com/file/d/1xow6FwTD3h87wo61RkP6WLA1f0byjdFg/view?usp=sharing>

Exhibit 1 DETAIL FROM FIGURE 5-3, FLOOD ZONES (975-year “return” in green diagonal striping)

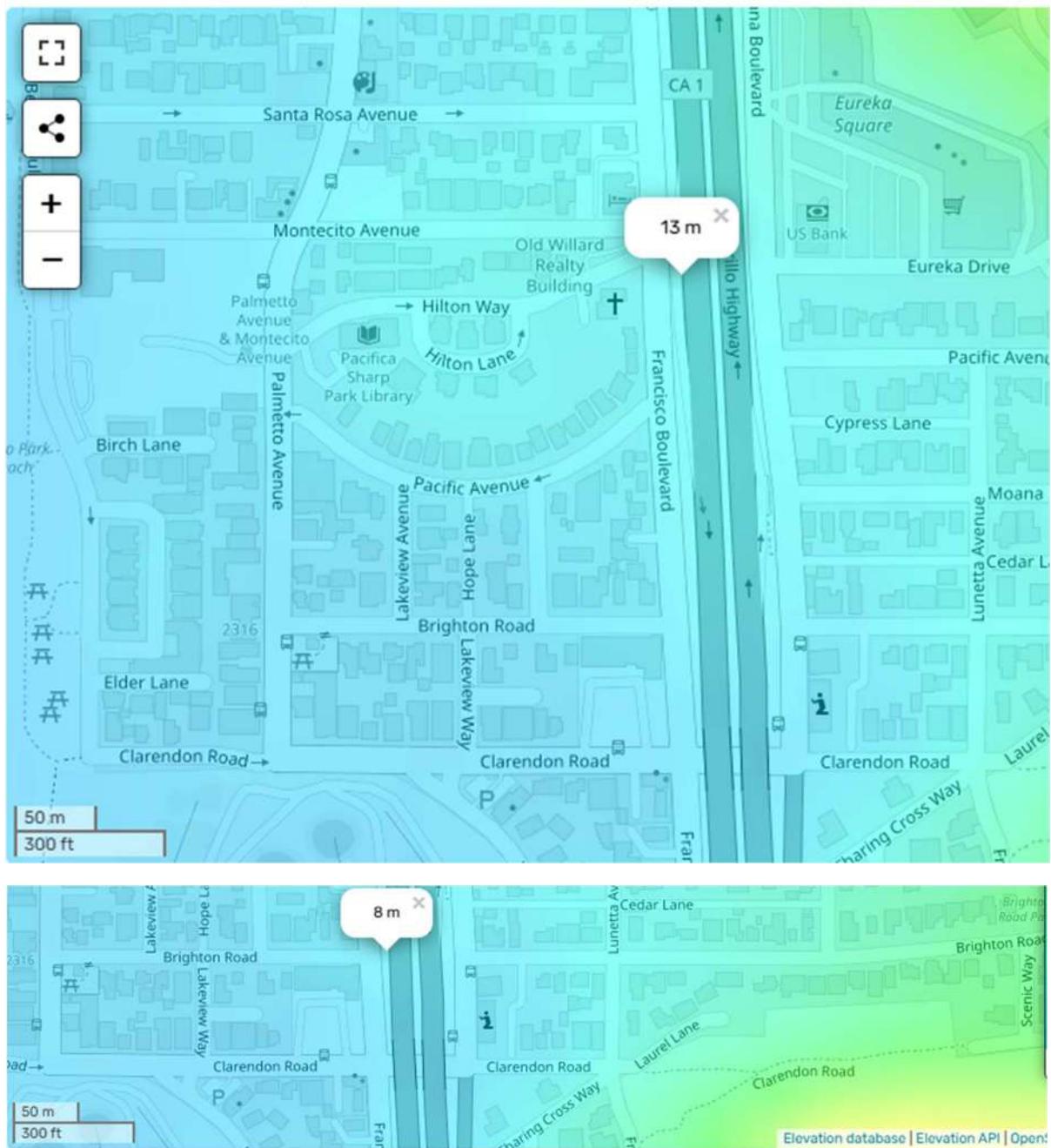


Detail showing West Sharp Park, Golf Course-West Fairway Park neighborhoods, from EXHIBITS, Exhibit 3, Proposed LUP Maps & Figures, Figure 5-3 Flood Zones, (parallel green lines mark the tsunami evacuation zone (975 year return) LCP-2_PAC-23-0056-3, Pg. 20 of 25 (257 of 268)

Exhibit 1.2 Pacifica Topographic Map, interactive, Rockaway Beach Area

Interactive map

Click on the map to display elevation.



Details, section of West Sharp Park, both west and east of the Freeway, between Santa Rosa (N), Clarendon (2) and Lunetta Ave. (E), from Pacifica Interactive Topographic Map, <https://en-gb.topographic-map.com/map-92ng5k/Pacifica/?zoom=17¢er=37.63163%2C-122.48821&popup=37.63249%2C-122.48981>

Exhibit 1.3 Detail from Tsunami Inundation, Sharp Park, W. Fairway Park



Detail, West Sharp Park and Golf Course-Fairway Park Neighborhoods, from EXHIBITS, Exhibit 3, Proposed LUP Maps & Figures, Tsunami Inundation, LCP-2_PAC-23-0056-3, Pg. 23 of 25 (260/268)
(parallel blue lines mark Tsunami Inundation Zone, 475 year return)

Exhibit 1.4 Detail from Tsunami Inundation, Rockaway Beach Area



Detail, Rockaway Beach Neighborhood, from EXHIBITS, Exhibit 3, Proposed LUP Maps & Figures, Tsunami Inundation Map, LCP-2_PAC-23-0056-3, Pg. 23 of 25 (260 of 268)
(parallel blue lines mark Tsunami Inundation Zone, with 475 year return period)

Exhibit 1.5 Pacifica Topographic Map, interactive, Rockaway Beach Area

Interactive map

Click on the map to display elevation.



Details, Rockaway Beach, both west and east of the Freeway, from Pacifica Interactive Topographic Map, <https://en-gb.topographic-map.com/map-92ng5k/Pacifica/?zoom=16¢er=37.60845%2C-122.49063&popup=37.60901%2C-122.49523>

Ringuette, Oceane@Coastal

From: Alex Bennett <alex@abennett.com>
Sent: Friday, May 2, 2025 4:35 PM
To: NorthCentralCoast@Coastal
Subject: Please delete "Trojan horse" provisions in Pacifica's draft LCP Land Use Plan

Dear Chair Cummings and Coastal Commissioners,

Please delete Policies CR-I-38 through CR-I-44, at the end of Chapter 6 ("Coastal Hazards") from the City of Pacifica's Draft Local Coastal Program Land Use Plan. These policies can be deleted without **any** impact to the rest of the LCP.

Policies CR-I-38 through CR-I-44 create "Special Shoreline Resiliency Areas" (SSRAs), which are a Trojan horse concept to open the door to intensified development of **new** non-coastal dependent uses in Coastal Hazard Zones, which would create new risks to people and property.

The pre-Coastal Act development in these areas is already protected under the Coastal Act. The Policies discuss possible protections that might be needed in the future for the pre-Coastal Act development, then slips in mention that these protections might be needed for new development as well.

We don't need new protections to attract new development to Pacifica. Why build a sea wall so real estate developers can assure buyers they will be safe in Coastal Hazard Zones, when we know the protections will **fail** to keep buyers safe in the long term?

Public comment has been overwhelmingly **against** the SSRAs, by an order of magnitude.

Thank you for recognizing the risk that Policies CR-I-38 through CR-I-44 pose to future generations and to the coast of California, by removing them from Pacifica's Draft Local Coastal Program Land Use Plan.

Thank you very much!

Alex Bennett
West Sharp Park, Pacifica

Honey, Julian@Coastal

From: Andy Narraway <andynarraway@gmail.com>
Sent: Friday, May 2, 2025 1:07 PM
To: Pacifica LUP Update; NorthCentralCoast@Coastal
Subject: City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update) May 8 th , 2025 Agenda Item 9a

Dear Sir or Madam.

RE: Pedro Point Field Pacifica.

We, the residents and voters of Pacifica, demand some answers. What backroom dealings have been made between the owners of this piece of unused land and the planning department/council members that have led to this land being changed from Commercial Recreation to Residential? Despite over a decade of residents' protests, environmental reports, natural weather events and many council meetings vociferously opposed to this zone change, the council has decided to run roughshod over the overwhelming number of local residents opposed to this change and put forward the current plan. Its is obvious this land should be Conservation. NOT Residential for the following reasons:

1. It has been documented by many experts in their field (and submitted to council) that this field is a sensitive habitat for 2 endangered species: Red Legged Frog and the San Francisco Garter snake. In my 13 years of living near the field I have personally observed Red Tail hawks, Egrets, Herons, Ducks and even a mountain lion present in this area.
2. It is a floodplain. During and after rains, the field is completely flooded with all the runoff from the surrounding hills. It ALL funnels down to this field. Adding buildings onto this land will push all that flood water out to the boundaries and threaten many more homes and businesses that neighbor it.
3. It is an escape route for either a coastal tsunami and forest fires, Both of which are increasingly likely due to climate change. Adding buildings will endanger lives. Period.

Therefore I would kindly ask the CCC to reject this plan and revert the field back to Low Intensity Visitor Serving Commercial as it currently is, or to a Conservation zone.

Thank You

Andy Narraway
Pedro Point, Pacifica

Honey, Julian@Coastal

From: Bryan Reinero <breinero@gmail.com>
Sent: Friday, May 2, 2025 4:59 PM
To: NorthCentralCoast@Coastal
Cc: Honey, Julian@Coastal; Ringuette, Oceane@Coastal
Subject: Public Comment Thursday, May 8, Agenda Item 9a, City of Pacifica LCLUP

Follow Up Flag: Follow up
Flag Status: Completed

Commissioners and Staff,

Thank you for your important work, upholding the Coastal Act. Protecting our unique and precious coastline is an ongoing responsibility that benefits millions of Californians and visitors, to say nothing of the future generations who will appreciate the work done today.

As an engaged and active citizen of Pacifica, I have concerns with specific portions of the City of Pacifica's LCLUP updates.

1. Special Shoreline Resiliency Area policies (CR-I-38 to CR-I-44)

Pacificans are nearly unanimous in their agreement that SSRAs are bad for our community. The reasons are numerous and include (but not limited to):

- SSRAs create inequities between our neighborhoods
- SSRAs bring serious and very negative long-term effects and presidents
- SSRAs run counter to superior, nature-based solutions
- SSRA lead to potential future developments in unsafe areas of the coastal zone

When the Pacifica City Council voted about the draft LCLUP, it was a 4 – 1 vote, with the dissenting council member casting a “no” because of the many unknown costs for SSRAs. Another council member voted “yes” simply to “move the plan forward to the Coastal Commission, trusting they will make the best decision for Pacifica”.

2. The Pedro Point Field

- Retain the current zoning as Commercial Recreation or change to Conservation. Do not rezone to “Coastal-Residential Mixed Use”.
- The Pedro Point field contains protected Environmentally Sensitive Habitat Areas (ESHA) as documented in the Coastal Commission and additional State Agency maps/documents.
- The field is an important protection against coastal flooding from the hills and future sea level rise.
- The neighborhood of Pedro Point only has one point of ingress and egress. Additional development would have negative safety consequences for residents and visitors. Most of the neighborhood is now in a high fire risk zone.

3. The Quarry and Shelldance

Retain these areas for permitting by the CCC (versus granting the City of Pacifica permitting authority).

Thanks and regards,
Bryan Reinero

Ringuette, Oceane@Coastal

From: Beth Craig <arroyobeth@gmail.com>
Sent: Friday, May 2, 2025 4:10 PM
To: NorthCentralCoast@Coastal
Subject: Thursday, May 8, agenda item 9A, City of Pacifica LCLUP
Attachments: Protect Timiktak (1).pdf

Follow Up Flag: Follow up
Flag Status: Completed

As a documented Rammaytush descendant from the village of Timiktac along Calera Creek in what is now called Pacifica, I, Cata Gomes, have deep concerns for the city's repeated lack of consideration for our ancestral coastal village site -- their lack of concern regarding the archaeological/historical/cultural importance of this location to the Rammaytush descendants and our allies.

The first slide shows the designation of the Timiktac village site along Calera Creek. The actions of the city of Pacifica have contradicted their land acknowledgement which states their respect and sovereignty of the Rammaytush descendants. The city of Pacifica has not adequately determined where our culturally sensitive areas are through comprehensive archaeological study.

In two previous projects, the installation of the sewer treatment plant along Calera Creek and the creation of a berm between Sharp Park golf course and the Pacific Ocean, workers have indicated that artifacts were found in both of these locations, never reported on and no one knows what has happened to them.

The second slide is a map that was made in 1909 designating the shell mounds in the SF Bay area. The map indicates the existence of three shellmounds in the area now known as the city of Pacifica.

The third slide evidences the existence of a coastal wetland marsh at the mouth of Calera Creek. This marsh is habitat to multiple protected species, such as the red-legged frog, San Francisco garter snake and Western pond turtles!

I am here as a representative of the original caretakers of this our unceded ancestral coastal homeland to express our deep concerns for protection, preservation and restoration of this open space.

Thank you for your time and for giving me the opportunity to speak.

Cata Gomes (Rammaytush, Salinan, Bay Miwok)
Founder and Executive Director of the Muchia Te' Indigenous Land Trust

Protect Timiktak

Timiktak

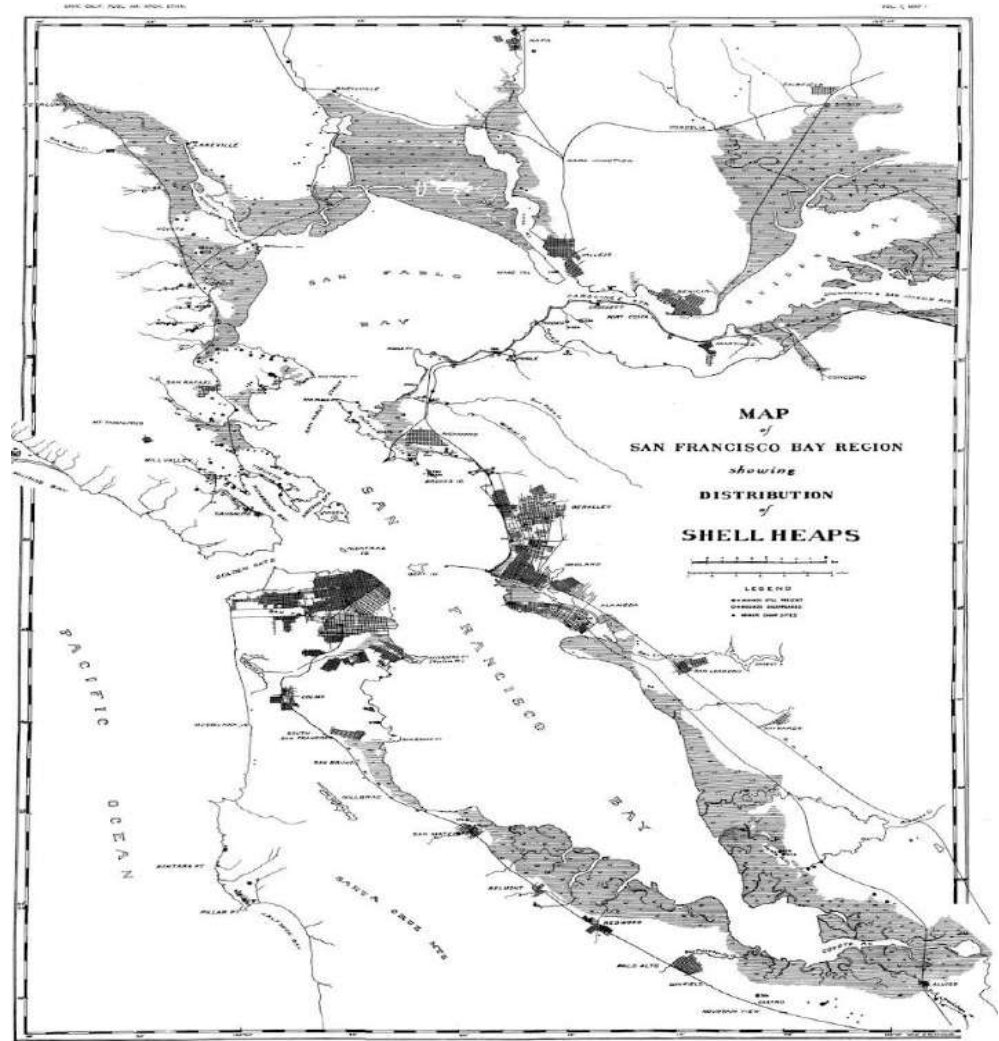
Translates to: ***The place of the Whales***

This village is on the bank of Calera Creek



Ancestral Village

Map of the Shell Mounds



Calera creek

Coastal wetland



TO: California Coastal Commission and interested parties
FROM: Local Government Working Group
RE: Neighborhood-scale adaptation planning

Regional and Phased Adaptation Planning: Support for Innovative Local Approaches

May 6, 2025

The Local Government Sea Level Rise (SLR) Working Group

Formed in 2018, the Local Government SLR Working Group shares a common goal: to improve adaptation to sea level rise and make Local Coastal Program (LCP) updates more predictable, efficient, and effective. The group includes two members of the Coastal Commission, as well as locally elected officials representing the California State Association of Counties and the League of California Cities. Together, we explore strategies that maintain statewide consistency in protecting coastal resources and access, while allowing flexibility to address local conditions and priorities.

We understand the Coastal Commission is considering an LCP update from the City of Pacifica that includes regional and phased approaches to SLR adaptation. Please note that we are not commenting on Pacifica's plan or attempting to influence any decision before the Commission.

We are writing to express our strong support for the use of innovative approaches to sea level rise response and coastal management that include a regional vision for adaptation and phased approaches to achieve that vision.

The Challenge: Consistent Yet Flexible Adaptation Planning

One of the Working Group's key findings is that the current piecemeal, parcel-by-parcel approach to sea level rise planning is inadequate. This method is costly, inefficient, and inconsistent with the broader scale of sea level rise impacts. It also results in fragmented decisions that fail to protect coastal resources or support sustainable community development. Conversely, a uniform statewide approach is equally problematic, as impacts and priorities vary widely along the coast.

The Working Group has identified the following key challenges:

- Uncertainty about the timing and location-specific impacts of sea level rise
- Legal and regulatory complexities related to takings, repetitive loss, and shoreline protection
- Inconsistent siting and design approaches between adjacent parcels
- Regulatory inconsistency and duplicative adaptation planning efforts

- Lack of clarity for property owners about what adaptive actions are permitted
- Difficulty communicating policy language and risk to diverse stakeholders
- Concerns about protecting beaches and natural areas, including by inland visitors and tourism-based economies
- The need for strategies that preserve environmental, economic, and social resilience
- Inadequate funding for implementation
- Challenges in phasing adaptation measures over time

To address these issues, we support the development of neighborhood-scale adaptation strategies. Planning at this scale could better protect coastal resources across larger areas, offer more certainty to communities and stakeholders, and reduce piecemeal decision-making. While developing such strategies will take time and collaboration, we believe the potential benefits are significant for consistent, programmatic planning.

Commission: Please Support the Innovation of Phased and Regional Adaptation Approaches

The Working Group continues to explore innovative models that balance near-term protection of threatened coastlines with long-term strategies such as managed retreat. We encourage timely testing and adoption of local- and regional-scale approaches, including neighborhood-based strategies. These emerging approaches have gained support from multi-stakeholder coalitions, natural resource advocates, and leading coastal scholars.

We applaud and support the use of these forward-looking strategies in Pacifica's LCP amendment.

Respectfully submitted by the Coastal Commission Local Government Sea Level Rise Working Group by the following members:

Bruce Gibson, Supervisor, San Luis Obispo County

Eric Friedman, Councilmember, City of Santa Barbara

Ed Waage, Mayor, City of Pismo Beach

Matt LeVere, Supervisor Ventura County

COUNTY OF SAN MATEO
BOARD OF SUPERVISORS

Ray Mueller
Board of Supervisors, Third District

County Government Center
500 County Center, 5th Floor
Redwood City, CA 94063
650-363-4569

May 5, 2025

California Coastal Commission
Attn: Executive Staff
455 Market Street, Suite 300
San Francisco, CA 94105

Re: Support for North Coast County Water District's Position on Critical Infrastructure and Coastal Resiliency

To Whom It May Concern:

I write to express my support for the position of the North Coast County Water District regarding the protection of critical public infrastructure in coastal communities such as Pacifica. San Mateo County is uniquely vulnerable to the impacts of sea level rise and coastal erosion. As we work together to confront these challenges, I want to commend the Coastal Commission for its leadership and foresight in issuing the 2021 Final Adopted Guidance document, *Critical Infrastructure at Risk*. This document appropriately recognizes the unique and pressing challenges that critical infrastructure poses in the face of climate change and outlines a path that allows for shoreline armoring, when consistent with the Coastal Act, as a reasonable short- to mid-term adaptation strategy.

The North Coast County Water District is already confronting the immense task of maintaining and upgrading aging infrastructure for continuity of services. For the sake of affordability, safety, and resilience, it may be both reasonable and necessary to protect infrastructure in place over the short to medium term and offer flexible options that do not unduly burden the communities they serve, especially where such protection aligns with the overarching goals of the Coastal Act.

I support the District's ask that Pacifica's Local Coastal Land Use Plan expressly include references to the Coastal Act's balancing test, which the Commission could apply when considering a variety of factors when critical public infrastructure is at risk due to coastal erosion or sea level rise. Thank you for your attention to this important matter, and for your continued leadership in navigating the complexities of climate adaptation along California's coast.

Sincerely,



Ray Mueller
San Mateo County Supervisor, Third District



Ringuette, Oceane@Coastal

From: Cherie Chan <chan.cherie@gmail.com>
Sent: Friday, May 2, 2025 4:37 PM
To: NorthCentralCoast@Coastal; Pacifica LUP Update
Subject: Pacifica Coastal

Dear California Coastal Commission,

Hi there, my name is Cherie Chan, I live in Pacifica, eight miles to the north of Half Moon Bay, where you will be meeting next week to determine the direction of our town for the first time since our Local Coastal Plan was last adopted in 1980. I attended my first Pacifica General Plan Update meeting in 2009 and nearly every meeting since then. During this time, the City of Pacifica, has never provided a rationale for changing the land use designation of the Pedro Point Field from Commercial, Visitor-serving Recreation to residential uses. There is much good in this updated plan that should be adopted, but with updated hazard, ESHA and wetlands maps which reflect the best available science and Coastal Commission Reports.

In addition, staff's wholesale adoption of Pacifica's Local Coastal Plan at three critical locations will **result in further-intensified development in high-hazard zones exacerbated by Sea Level Rise.**

- A change to the zoning for the Pedro Point Field from Commercial Recreation to housing in a hazard zone would restrict coastal access and place additional Pedro Point residents in harm's way,
- Relinquishing Coastal Commission's jurisdiction of the Quarry from an area of deferred approval to giving primary control to the City of Pacifica will be an abdication of the Coastal Commission's primary responsibility to protect coastal access for all Californians, and
- Special Shoreline Resiliency Areas (SSRAs) that are stated to be for a limited period of 20 years but that come with huge obligations by the City of Pacifica which exceed their ability to mitigate.

These changes do not reflect the majority of public comments or public sentiment I have read or sat through over the past 15+ years. I have already provided extensive prior documentation, along with the Pedro Point Community Association, noting that the revised LCLUP will remove established coastal trails which are enshrined by both open, notorious, and continuous use and the current Local Coastal Plan, which has been in place since 1980 and turns them into "view points" By adopting this LCLUP without considering these comments, you will be rubber-stamping the removal of coastal access for all Californians. Please reject staff's approval and require the City to provide updated ESHA, Wetlands Coastal Access, and Fire maps. Thank you for your time.

Cherie Chan
Pacifica, CA

From: [Cindy Abbott](#)
To: NorthCentralCoast@Coastal
Subject: CCC May 8, 2025 Meeting: Agenda Item 9a, City of Pacifica LCLUP Update, Public Comment
Date: Friday, May 2, 2025 2:14:31 PM
Attachments: [CCC Public Comment Thurs, May 8 Item 9a City of Pacifica LCLUP.pdf](#)

Dear Coastal Commission Staff,
Attached please find my public comment for the Thursday, May 8, 2025, meeting of the California Coastal Commission, Agenda Item 9a.

I am in support of the staff's recommendation to approve the plan, WITH ONE SIGNIFICANT MODIFICATION: **Approve only after the removal of SSRA specific Policies CR-I-38 to CR-I-44, found at the end of Chapter 6, Coastal Hazards.**

Additional details and information on the attached provided for Coastal Commissioners and public record.

See you Thursday!

Thank you for your time and attention,

Cindy Abbott

West Sharp Park, Pacifica

Dear Chair Cummings and Coastal Commissioners,

I've actively participated in the process to update the Pacifica LCLUP since 2012. It's exciting that we are finally close to a modernized plan that uses the best available science and recognizes the increasing risks of the climate crisis.

There is however, a significant flaw in the plan: the inclusion of "Special Shoreline Resiliency Areas (SSRAs). Though Coastal Staff has been led to believe that there is broad support for the SSRAs, it's been precisely the opposite, bringing together an unusual alliance of individuals and groups in shared opposition. The community has been speaking out against SSRAs since their introduction on December 5, 2023, when they were dropped without any prior consideration; these policies did not come from public input, or from direction by City Council during open public meetings.

Reasons for not supporting the SSRAs include:

- Approving legislative carve-outs of the coast, in clear violation of Coastal Act provisions, allowing new intensified development behind hard armoring that will set a precedent for the entire California coast (Coastal Staff in their report indicate, if approved, they anticipate more municipalities will request similar policies);
- Placing more people and future generations at risk by new development in documented *extremely* vulnerable coastal hazard zones (also in violation of Coastal Act 30252(a);
- Lack of substantiation about the policies including what is covered and if these policies are even necessary; significant portions of these areas were developed prior to the Coastal Act (see Coastal Staff Report Exhibit 5), and the CCC has, when necessary approved projects that "protect" public infrastructure, (i.e., the recently approved Ocean Beach, San Francisco seawall), at least for a near term;
- Drawing attention and time away from a need to plan for future relocation of infrastructure;
- Creating inequities between neighborhoods (i.e., enhanced "protection" for some but not all);
- Limited focus without visioning for the entire coast of Pacifica;
- Unlikeness to pursue **significant** coastal enhancements (i.e., removing hard armoring, actively working on nature based solutions) as documented by the City (Staff Report Dec 5, 2023, pg 6; full report below) that they are not likely to consider removal of existing armoring, and haven't taken any action to acquire/conservate properties subject to coastal hazards. Instead supporting enhancements that should be considered regardless of SSRAs, such as picnic and seating options, improved and maintained trails, waste receptacles, etc. Note: A beach Parking structure has been considered in Rockaway Beach for decades, and the same for Sharp Park where the north end of Beach Blvd was

included as a location for additional parking in prior city planning documents, including the current 1980 LCLUP without any actions ever taken, even when this property has been available to purchase multiple times over the past 10 years).

- Disregard for science and documented studies that coastal armoring in one location creates havoc adjacent and seawalls increase refraction of waves; and also
- Disregard for the economics of a city with extremely limited capacity.

Concern over these policies continued throughout the public review process and even during the vote of the Pacifica City Council on Oct 28, 2024.

The City Council voted 4 to 1 to transmit the plan to the California Coastal Commission.

- Councilmember Boles cast a “no” vote due to the unknown scope of, and costs for, the implementation of the Special Shoreline Resiliency Areas (SSRA) strategy, and lack of clarity as to their necessity.
- Councilmember Bier (as documented in video of the meeting) voted yes, only to “move the plan forward to the Coastal Commission, trusting they will make the best decision for Pacifica”, thereby not offering full support for draft LCLUP.

During the review process, Coastal Staff required City Staff to move these damaging policies to a separate section of the updated LCLUP. **SSRA-specific Policies CR-I-38 to CR-I-44, are encased at the end of Chapter 6, Coastal Hazards, and therefore can be easily removed from the plan prior to approval.**

City staff claims that the SSRAs are:

“... crucial for Pacifica due to their strategic focus on balancing coastal protections with ongoing urban and infrastructure needs. These policies specifically allow the neighborhoods of West Sharp Park and Rockaway Beach to continue maintaining and modifying existing development while providing flexibility for *new development*, a benefit not afforded to other areas with the Coastal Zone.”

Let's be clear. The true intention of the SSRAs isn't resilience. The goal of SSRAs is to promote intensified development of *new, non-coastal dependent uses in highly vulnerable areas, that are designated as Coastal Hazard Zones (see photos below)*. A City staff report first documented this scheme on December 5, 2023 (Page 7, included below) noting:

“A main objective of SRAs is to enable development in reliance on existing shoreline protection devices.”

While the draft LCLUP reflects a 20-year sunset policy for the SSRAs, there is also an option to request the approval to be extended. **New Intensified development would likely be the driver to continue to cement the need for ongoing hard armoring.**

We've already lost most of the sandy beach north of the Pier. As documented in recent studies, the loss of beach has been a primary reason for failures of the north wall, while noting that it still has 40 years (or more depending on the study) of remaining life:

The North (Beach Blvd retaining) Wall is subject to greater wave energy than other wall segments due to the absence of a beach fronting the system. Beaches act to dissipate wave energy; thus, resulting in reductions in wave runup and overtopping on the wall. Significant runup and overtopping events occur during periods of coincident high water level and wave events. **All past wall failures seem to be a direct result of these events.** Beach Blvd Infrastructure Resiliency Project, GHD Existing Conditions Report, Page 16.

Beach Boulevard Shore Protection Inspection In 2018, GSI completed a professional opinion of the City of Pacifica Beach Boulevard shore protection from Paloma Street to the north end of Beach Boulevard. The main findings of the inspection were as follows: • The shore protection (reinforced earth (RE) vertical wall and the large quarry stone revetment) are in very good condition. • The large (revetment) stones are locked properly into place. • The concrete base (apron) of the RE wall was intact without any signs of movement, such as concrete cracking. • The wall panels were vertical and true, with no signs of lateral or rotational movement. There were small areas where the internal rusting of the RE wall restraining strap had bled through the wall, and minor spalling due to the rusting (likely due to ... inadequate concrete cover of the strap at the seaward face of the wall). Four test pits were excavated to investigate the RE wall and the reinforcing straps: It was determined that "all of the straps were found to be in excellent condition...there were no signs of significant rusting and no spalling at all." Findings concluded that **"...the overall condition of the wall is very good. The shore protection should perform adequately over the life of the project provided it is monitored and maintained."** (The project was a new build of 7 townhomes, with an estimated life of 75 years.) GHD | Existing Conditions Report | 11213162 | Page 18 •

Let's not allow repeated errors of continuing hard armoring that eliminated the public beach and access to the sandy shore north of the pier by encouraging the expansion and continuation of hard armoring that could remove sandy beach and natural buffer south of the pier.

Please remove SSRA-specific Policies CR-I-38 to CR-I-44 and then approve an otherwise strong plan. As additional options are considered, and visioning for ALL of the coast that Pacifica is the steward of are developed with a robust public input process (as yet not conducted by the City, as the number of meetings isn't an indicator of actually *hearing and incorporating public voices into the plan*), the City of Pacifica can return with a LCP Amendment when ready.

With high regard and appreciation for upholding the Coastal Act,

Cindy Abbott

Sharp Park, Pacifica

May 2, 2025



PS Below is public comment submitted for the "Neighborhood-Scale Adaptation Workshop" held in partnership with the Coastal Cities Working Group in September 2024, that is applicable to the SSRA discussion. I've relistened to the video recording of that meeting. The conversational guidance that followed did not offer support for expanding neighborhood scale seawalls to allow for new non-coastal dependent development.

September 6, 2024

Dear Chair Hart and all California Coastal Commission Members

cc: Kate Hucklebridge, Executive Director, California Coastal Commission

Re: Neighborhood-scale Adaptation Workshop and Draft Discussion Paper

Thank you for the work that has taken place over the past several years to listen to the voices of stakeholders throughout the State of California regarding Local Coastal Programs and specifically the critical inclusion of planning to address the accelerating climate crisis including both escalating erosion and future sea level rise.

Over the past nine months, after taking part in the local planning process in the City of Pacifica for a decade, I've spoken during general public comment times at California Coastal Commission meetings expressing concerns with a move in the City to carve out sections of our spectacular California Coast that has the potential to undermine the internationally acclaimed landmark legislation that is the California Coast Act. The Draft Discussion Paper, and lack of clarity it provides, reflects a series of assumptions and only raises more questions about how to responsibly plan for the long-range future of the Coast.

For years, Coastal Staff has provided clear and direct feedback to City Staff regarding the draft City of Pacifica update to the Local Coastal Program and how it could not be found consistent with the Coastal Act, including Sections 30235 and 30253, as submitted. The feedback rightly noted that:

"...In short, the City's proposal does not actually take the difficult coastal hazard questions facing this community, and is most aptly described as a "full-armoring" adaptation plan that would essentially commit the City in the long run to the detrimental effects of same, including the loss of its beach and shoreline recreational areas. This commitment to "full armoring" is clear as the City's proposal explicitly requires that managed retreat be prohibited from even being considered in any LCP/CDP analysis scenario. The City's proposed coastal hazard provisions cannot be found consistent with the Coastal Act as proposed."

Summary of Staff Recommendation, Prepared February 24, 2023 (for March 8, 2023 Hearing, that the City of Pacifica had pulled from the agenda), from: Stephanie Rexing, North Central Coast District Manager; Julia Koppman Norton, Coastal Resilience Coordinator; Oceane Ringuette, Coastal Planner.

Since that time, the City and Coastal Staffs have continued conversation to move forward with the needed update to the decades old LCP. Unfortunately, that has led us to where we are today with the City unable or unwilling to prepare long-range strategies to address not only the future significant impacts associated with coastal hazards, but those that the City of Pacifica has been experiencing since the El Nino of 1983 and that have been accelerating since.

While the language about refusing to consider managed retreat as an option for addressing visible coastal hazards has been removed from the Pacifica draft LCP and other updates have been made since the (2023) memo, what remains is a plan for continued hard-armoring of the shoreline in Pacifica.

What has also changed is that plans are now being put forth under the guise of being a “neighborhood-scale adaptation” strategy for West Sharp Park and Rockaway Beach that inexplicably provides not only for continued hard-armoring, but also for **INTENSIFIED NEW DEVELOPMENT** behind a proposed expanded seawall, including areas of the seawall south of the Pacifica Pier that have never been breached and a section for where a nature-based solution should be considered.

Continued hard armoring and intensified development – none of which is “coastal dependent” - in a known coastal hazard zone is the anthesis of the intention of the Coastal Act. This “neighborhood-scale adaptation” plan is not adaptation. The proposed concept is a continuation of age-old attempts to hold back naturally eroding bluffs that create the beaches, trying to hold firm what is an unfixed and ever-changing shoreline, that have been shown over decades to be ineffective for the long-term and that have accelerated erosion and loss of our beaches.

The CCC and Local Government Working Group draft discussion paper indicates concern from some about a prescriptive “one-size fits all” approach to coastal planning. However, unlike other jurisdictions LCP updates, the City of Pacifica’s planning process already included a Sea Level Rise Adaptation Planning process that included geographic sub-areas, recognizing the variation between the tall sandy bluffs in the north along Esplanade/Manor to the at sea level area where Pacifica State Beach, Linda Mar is situated. That early planning, grant-funded through the Coastal Commissions grant program, also included active discussion of monitoring and “triggers” for when adaptation strategies would need to kick-in.

On December 5, 2023, that all changed when Pacifica City Staff dropped the concept of Special Shoreline Resiliency Areas (SSRA’s, initially coined Special Resiliency Areas, SRA’s) on the community. The name of this concept would be laughable if it weren’t so egregious. Coastal

resiliency is defined as the ability of a community to bounce-back and/or recover from hazardous events. Fixing the shoreline with hard-armoring is not adaptation.

The proposed implementation of neighborhood-scale adaption in Pacifica allows for additional and seemingly into perpetuity hard-armoring of two key areas of the shoreline – to allow for additional intensified development that is not coastal dependent in a coastal hazard zone -- areas that have already been impacted by decades of hard-armoring that is reflected in the loss of sandy beaches and coastal habitat.

What will be gained for the People of California and those beyond by allowing this “neighborhood-scale adaptation” strategy is nebulous – no actual mitigation measures have been presented and the current concept allows this strategy to be initiated only with a timeline for planning further community engagement.

To date the City of Pacifica’s community engagement activities have been contrived and focused on only the number of meetings held and number of attendees. Presentations of information are made and prescribed outcomes that City Staff are desirous of implementing have been the result. Voices throughout the community are canceled out; this is not actual community engagement whereby voices are heard, responded to, and consensus reached.

This is highlighted by public comments during City of Pacifica City Council meetings where the public – on all sides of the coastal management discussion – have ***universally spoken out AGAINST the SSRA’s***. The concept is unequitable between neighborhoods, has already led to a clamor of interest to be included in areas where hard armoring will be perpetuated in an attempt to expand hard armoring to all of the coast.

While recognizing that adaptation will be different by each geographic sub-region, we must consider the coast holistically and plans for the long term. Yes, this is difficult work, however this bigger vision will ultimately be more economical and beneficial.

Please consider providing the means to support municipalities to:

- Require plans to include plans by geographic sub-region (versus this side bar of “neighborhood-scale adaptation) and triggers.
- Require a long-range vision for the ENTIRE shoreline of a municipality (or shared shoreline covering multiple jurisdictions) - not a piecemeal approach that carves out sections of the coast, creating inequity and leaves future generations to work through the difficult decisions that some are trying to kick down the road.
- Require meaningful community engagement with funding to include trainers skilled in mediation and visioning.
- Partner with coastal resiliency experts and communities to develop educational materials that help communities understand the hazards and why we all need to plan for the climate crisis, including how these efforts will benefit both current and future generations, versus a focus on fear and confusion that has come out of current

processes. Support planning efforts that dispel the misinformation that anyone is advocating for immediate managed retreat.

- If hard armoring is allowable for the short to near term while long-range planning and implementation is taking place ensure that NO additional people or structures will be placed in harms way through new intensified non-coastal dependent development, as it will only perpetuate the cycle of armoring versus true adaptation and resilience.
- If hard armoring is allowable ensure that strong mitigations -- and not those that should be provided anyway such updated bathrooms, bike racks, dog poop bags stations, or vertical access to beaches that no longer exist as identified by the City of Pacifica -- are identified PRIOR to any implementation.

Say NO to carving out sections of the California Coast, not only in Pacifica, but throughout the State of California.

Say YES to visionary planning that establishes holistic planning for the future, while addressing short-mid term needs on the way to achieving (these goals) and maintain the strong globally acknowledged accomplishment that is the Coastal Act.

Embrace the idea and support through innovative grant funding for the neologism (new words) created through a social practice arts engagement process in Pacifica:

Wedapting: A community coming together through dialogue and problem solving for long term planning to adapt to extreme storms, sea level rise or other extreme weather events caused by climate change. A coming together for mutual protections. An openness of a community to weather difficult discussions around triggering topics. This includes long term planning for both private homes and city infrastructure, recognizing both are essential components of a successful community.

Let's not succumb to another neologism:

Byeog (Korean in origin): Wall sickness. Wall sickness is not solving the problem, but is like taking Tylenol. It may make you feel better temporarily but does nothing to cure you. Recognizing it is the nature of water to find its way. Seawalls can push sea level rise higher in neighboring communities, shifting the problem without ever addressing the underlying issue. To begin to build walls is like a virus; they keep reproducing. Eventually the entire continent would need to be enclosed – and we would have walled ourselves inside.

Thank you for your long-standing and continuing support for the California Coast.

With respect,

Cindy Abbott

West Sharp Park, Pacifica

Coastal Hazard Zones proposed for SSRAs in Pacifica

Let's not place future generations at risk by allowing the City of Pacifica to push addressing the coastal hazards we are already facing down the road.

New intensified development in both West Sharp Park and Rockaway Beach will only put more people in harms way and have the potential for future displacement and disruption. We need to face the future NOW.

Rockaway Beach, Dec 28, 2023

Boulders, debris, sand and water thrown onto the walking trail by the power of the ocean.



West Sharp Park, December 2020 (though we all have many recent photos too!)
**Powerful waves that have been increasing in intensity and frequency and that will
refract stronger and higher with bigger seawalls**





CITY OF PACIFICA COUNCIL AGENDA SUMMARY REPORT

12/5/2023

SUBJECT:

Community roundtable to discuss potential alternative modifications to the California Coastal Commission staff's March 2023 suggested modifications to the City of Pacifica's Certification Draft Local Coastal Land Use Plan (LCLUP).

RECOMMENDED ACTION:

Receive a presentation from staff, observe the community roundtable discussions, and receive public input about potential alternative modifications.

STAFF CONTACT:

Christian Murdock, AICP, Planning Director
(650) 738-7341
cmurdock@pacifica.gov

Stefanie Cervantes, AICP, Senior Planner
(650) 738-7341
scervantes@pacifica.gov

INTRODUCTION:

The California Coastal Act requires every city along the coast to prepare a Local Coastal Program (LCP), which consists of two parts: a Local Coastal Land Use Plan (LCLUP) and an Implementation Plan (IP). The LCLUP must be consistent with the Coastal Act. The LCLUP must specify the intended uses of land within the Coastal Zone, and serves as a policy framework for future actions, such as development review and City infrastructure projects. The LCLUP will also guide the contents of the IP, which consists of the zoning ordinance, zoning map, and other policies and programs to implement the LCLUP.

While the LCLUP is separate from the General Plan, much of the descriptive text and policies overlap between both documents due to their similar purpose of specifying land uses, establishing goals and policies, and providing a policy framework for future actions. There are many benefits to having an updated LCLUP, including updated maps, modernized policies to guide development, enhanced environmental protections, strengthened economic development and housing policies, and consistency with the City's 2040 General Plan.

The City has worked towards completion of the LCLUP update for more than 10 years. Considering how to respond to California Coastal Commission (CCC) staff's suggested modifications to Pacifica's Certification Draft LCLUP, approved by City Council in February 2020, is a critical step in the update process. To further that effort, this community roundtable session is the second of a three-meeting series to engage and inform the public and City Council members. Each meeting has a different focus, with Meeting #1 having focused on understanding the overall suggested modifications from CCC staff. The focus for this meeting, Meeting #2, will be primarily on potential alternative modifications related to future development in the Rockaway Beach and West Sharp Park neighborhoods as Special Resiliency Areas (SRAs), or "carve out" areas, from the overall framework of the LCLUP. Participants of the community roundtable should be prepared to discuss the benefits and drawbacks of the SRAs and provide input on the draft SRA policies. Meeting #3 will focus on consideration of a

comment letter to the CCC requesting consideration of alternative modifications instead of CCC staff's suggested modifications, and discussion of what those potential alternative modifications should be. While there will be an opportunity to comment on other alternative modifications directly related to the CCC suggested modifications at Meeting #2, the main focus will be the Rockaway Beach and West Sharp Park neighborhoods mentioned and potential exceptions or carve outs that would establish those neighborhoods as SRAs. Meeting #3 will provide an additional opportunity to comment on other alternative modifications related to the CCC suggested modifications.

BACKGROUND/DISCUSSION:

In February 2020, City Council approved the Certification Draft Local Coastal Land Use Plan ("2020 LCLUP"), and directed the City Manager to transmit it to the California Coastal Commission (CCC) for certification. Additional background information, including the 2020 LCLUP document (also known as the "Certification Draft LCLUP"), are available on the [Project Documents page](#) of the Plan Pacifica website¹.

Staff submitted the 2020 LCLUP to the CCC in June 2020. Between the years of 2020-2022, City and CCC staffs exchanged several rounds of information in response to CCC staff requests. The information requested by CCC staff was required to address that agency's administrative filing requirements before the City's application could advance to a point where CCC staff could provide formal substantive comments on policy provisions related to certification. In August 2022, the CCC finally accepted the 2020 LCLUP for filing. On December 16, 2022, the CCC took action to extend the deadline by one year, as authorized by Public Resources Code section 30517. The CCC's action extended the deadline to December 22, 2023. Failure by the CCC to act within the statutory deadline results in an LCP amendment being deemed approved by the CCC.

In late February 2023, the City received notice the CCC would consider the City's Certification Draft LCLUP at the March 8, 2023, CCC meeting. The CCC staff report for the item included CCC staff's final recommendation, which included many suggested modifications to the City's submittal ("CCC Suggested Modifications")². The City requested a continuance of the March 8th hearing date to allow an opportunity to review and consider the CCC staff's recommendations. Since March, City staff has met multiple times with CCC staff to gain a better understanding of the suggested modifications in order to develop a comprehensive analysis and explore potential revisions for future City Council consideration.

On October 9, 2023, the City Council directed the City Manager to incorporate 2040 General Plan consistency revisions into the 2020 LCLUP to form the Revised Certification Draft LCLUP, adopted the Revised Certification Draft LCLUP, and approved the transmittal of the Revised Certification Draft LCLUP to the CCC for certification (2020 LCLUP and Revised Certification Draft LCLUP collectively referred to as "Revised LCLUP"). The City's resubmittal of the Revised LCLUP to the CCC eliminated the December 22, 2023 deadline and will allow the City and CCC staff additional time to discuss potential revisions to the CCC Suggested Modifications. Staff anticipates a CCC certification hearing on the Revised LCLUP will occur no later than June 2024.

On October 9, the City Council also directed a three-meeting community engagement plan, as follows:

¹ Available at <https://www.planpacific.org/project-docs>.

² Available at <https://cityofpacificaeqnyte.com/dl/DpPxoDE8q3>, with City-added numbering for identification.

- November 13, 2023 - Meeting #1: Inform the Council and community on the CCC Suggested Modifications to the Revised LCLUP.
- December 5, 2023 - Meeting #2: Provide input on potential alternative modifications to those presented by CCC staff based on discussions between City staff and CCC staff (focused on SRA policy alternatives for Rockaway Beach and West Sharp Park).
- Tentatively scheduled late January/early February 2024 - Meeting #3: City Council consideration and approval of a comment letter to the CCC requesting revisions to the CCC Suggested Modifications to the City's Revised LCLUP.

This three-meeting process is intended to conclude the comprehensive LCLUP update process that started more than 10 years ago. It involves concluding the LCLUP update process based on the structure and policy emphasis approved by the City Council in the 2020 LCLUP, with consideration of potential modifications to certain policies as an alternative to the CCC staff's suggested modifications from March 2023. This process is not a reconsideration of the structure and policy emphasis that was approved in the 2020 LCLUP (and continued in the Revised LCLUP). The purpose of this process is to bring the Council and community to a point where a decision is made on whether to submit a comment letter to the CCC in response to CCC staff's comments from March 2023. This is a necessary step to conclude the comprehensive LCLUP update process that was started in 2009 and most recently approved by City Council in February 2020 and revised to incorporate conforming General Plan amendments in October 2023. Consideration of a comment letter to propose alternative modifications to the CCC that may be acceptable to the CCC and the City Council is the best and most expedient way for the City to seek CCC certification of the Revised LCLUP in a form that the City Council may be likely to adopt following CCC consideration.

Meeting #1 Summary: Discussion of California Coastal Commission Staff's Suggested Modifications (March 2023)

The [November 13, 2023 study session staff report](#) contains a summary a key suggested modifications, as well as attachments including a summary table with all CCC Suggested Modifications, the City's 2020 LCLUP text (the meeting was conducted before City transmittal of the Revised LCLUP to the CCC), and a brief summary of each modification. Staff presented the key suggested modifications to provide additional information and context, responded to Council questions, and also provided information about other suggested modifications not included in the initial summary of key suggested modifications (link to [meeting video](#)).

The design of Meeting #1 was intended to provide information to aid understanding of the CCC Suggested Modifications and their relevance to Pacifica. The design of Meeting #2, the community roundtable discussions, will focus on potential alternative modifications to address the CCC Suggested Modifications that would most significantly impact Pacifica.

Meeting #2: Potential Alternative Modifications

Background

Approximately half of the CCC Suggested Modifications apply to Chapter 6: Coastal Resiliency. This reflects the importance of coastal resiliency policies to the Revised LCLUP, in particular because of the anticipated increase in the frequency and severity of coastal hazards in future years as a result of climate change and sea level rise specifically, and how these hazards may affect Pacifica's existing development pattern. As described at the November 13, 2023 study session, staff identified a number of key CCC Suggested Modifications that, in staff's assessment, warrant consideration of alternative modifications. These include, but are not limited to:

- Section 6.3 Preparation of Policies;
- Section 6.5 Coastal Resilience Policies;
- Section 6.6 Sub-Area Policies and Programs; and
- Glossary

In staff's assessment, the most significant among these suggested modifications are those that would negatively affect the ability for development to occur within those parts of Pacifica that are already densely developed and situated near the shoreline. Staff has engaged in multiple conversations with CCC staff to determine what alternative modifications could address Coastal Act consistency while minimizing development obstacles in the Rockaway Beach and West Sharp Park coastal neighborhoods which would be most significantly impacted if the CCC Suggested Modifications were to take effect citywide. The remainder of this report will focus on such potential alternative modifications related to future development in these two neighborhoods. Staff acknowledges other suggested modifications may warrant discussion of potential alternative modifications, and invites public comments to identify them during this community roundtable discussion for a potentially more in-depth discussion and analysis at Meeting #3. However, the complexity and importance of the new policy language addressing potential SRAs for Rockaway Beach and West Sharp Park necessitates a thorough and focused discussion of its own, which prevents broadening the subject matter to be discussed at Meeting #2.

Potential Alternative Modifications to Address Near- and Mid-term Adaptation Challenges

There are significant direct and indirect financial costs, social, cultural, and economic impacts, and complicated legal issues associated with major shoreline adaptation planning. These interrelated factors make major shoreline adaptation planning a long-term undertaking. While the City should continue to study and consider appropriate strategies for broad-based, long-term coastal adaptation in response to intensifying coastal hazards, near- to mid-term adaptation strategies in Pacifica should be considered separately and will require different approaches.

In recognition of the long-term nature of major coastal adaptation activities, staff has sought to find a way forward to achieve certification of a Revised LCLUP that would respect Pacifica's existing built conditions in the Rockaway Beach and West Sharp Park neighborhoods that under all plausible scenarios will remain largely in their current forms for the foreseeable future. Reasons for focusing on these two neighborhoods include, but are not limited to:

- (1) the density and prevalence of existing development including high proportions of pre-Coastal Act development;
- (2) concentration of essential Coastal Act-supported land uses;
- (3) presence of critical public rights-of-way and infrastructure; and,
- (4) existence of broad shoreline protection benefitting multiple public and private landowners which complicates potential future removal.

Some specific factors in these neighborhoods are as follows:

- Both Neighborhoods
 - Existing shoreline protection devices protecting dozens of public and private properties.
 - Public coastal trail established by existing shoreline protection devices.
 - Concentration of visitor-serving retail uses inland of existing shoreline protection devices.
 - Presence of critical wastewater and other infrastructure immediately adjacent to

- Section 6.3 Preparation of Policies;
- Section 6.5 Coastal Resilience Policies;
- Section 6.6 Sub-Area Policies and Programs; and
- Glossary

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shoreline.

*MOST NOT COASTAL
DEPENDANT. ONLY A
COUPLE PLACES SELLING BAIT.*

- West Sharp Park
 - Pier established by existing shoreline protection devices.
 - Visitor-serving retail district and public library inland of existing shoreline protection devices.
 - Presence of critical wastewater and other infrastructure immediately adjacent to shoreline.
 - Prevalence of pre-Coastal Act development individually entitled to approval of shoreline protection.

*ALREADY ENTITLED TO SHORELINE
PROTECTION*

- Rockaway Beach
 - High concentration of visitor-serving lodging inland of existing shoreline protection devices.

*WITH PROPERTIES "PRE COASTAL ACT" AND
ALREADY ENTITLED TO PROTECTION.*

With the major factors affecting the Rockaway Beach and West Sharp Park neighborhoods in mind, staff has worked with CCC staff to formulate potential alternative modifications to CCC Suggested Modifications that would reflect the unique and beneficial combinations of existing land uses in these areas, and the detrimental impact to Pacifica and Coastal Act consistency that would result if shoreline protection devices were to be removed or ongoing development were to be disallowed.³

The potential alternative modifications discussed by City and CCC staffs are more specifically described in Attachment A "Alternative Adaptation Strategies in Pacifica". These alternative adaptation strategies reflect staff-level discussions based on both CCC and City staffs' years of experience participating in coastal planning processes in Pacifica. Each agencies' staff believes the policy approaches described in Attachment A would address many of the most significant issues raised throughout Pacifica's LCLUP update process, provide a reasonable basis to begin the public input process to consider whether the right balance has been achieved, and with further refinement could reflect a set of policies that each agencies' staff would recommend for approval by their respective decision makers. Both staffs recognize that the proposed approach will not address all interests of all parties, but have invested significant effort in developing the draft policy language reflected in Attachment A in the spirit of compromise and with the intent of accomplishing an achievement critical to both agencies: a comprehensive LCLUP update to replace Pacifica's existing 1980 LCLUP.

Special Resiliency Areas (SRAs)

The draft alternative modifications in Attachment A are intended to address many of the Chapter 6: Coastal Resiliency suggested modifications from CCC staff by inserting new policy text that would be specifically applied to two geographic areas – West Sharp Park (Attachment B), and Rockaway Beach (Attachment C). These areas are referred to as Special Resiliency Areas, or SRAs. The name reflects that special policies would apply within the SRAs that would be different from those policies generally applicable within the LCLUP elsewhere within Pacifica. The purpose of the Special Resiliency Area policies is to allow ongoing economic use and vitality of property, provision of public services, operation of visitor-serving uses, and protection of broad coastal access. Special Resiliency Areas will continue to rely on existing shoreline protection, while also requiring implementation of adaptation measures to be incorporated into

³ Based on the specific criteria used to identify the areas of Rockaway Beach and West Sharp Park (e.g., existing shoreline protection devices protecting critical infrastructure and residential and coastal-dependent development), it is possible that in the future additional areas of the City will meet the criteria and could be added via a Local Coastal Program Amendment.

development. The policies for the SRAs remove many of the CCC suggested modifications that most heavily impact development and create more flexibility for development to rely on existing shoreline protection devices and implement adaptation measures.

To receive the benefits of modified LCLUP policies applied within the SRAs, the City would also incur important new obligations in the administration of its Local Coastal Program, or LCP, of which the LCLUP is one part and the Implementation Plan, or IP, is the other. Notably, the City will need to carry out a program of coastal resource enhancements, which will be created post-LCLUP certification and will include a community outreach process to determine the specific projects, primarily within the SRAs, and identify potential funding sources for the projects. The City will also need to review development for potential adaptation opportunities that respond to applicable coastal hazards, such as eliminating certain existing nonconformities and considering modifications to development standards to reduce the exposure of development to such hazards. Importantly, the City will also need to coordinate with property owners for removal of development in cases where, despite the presence of shoreline protection, the development has been recurrently and significantly damaged by coastal hazards. These new obligations are discussed further below.

Coastal Resource Enhancements

Coastal resource protection is a fundamental goal of the Coastal Act. Construction of shoreline protection devices, such as seawalls and rock revetment, can result in coastal resource impacts that must be mitigated under the Coastal Act. While City staff acknowledges the essential nature of the existing shoreline protection devices in the Rockaway Beach and West Sharp Park neighborhoods, the ongoing presence of these devices as supported by the exceptions in the SRAs from LCLUP policies that would otherwise support their removal over time will require offsetting coastal resource enhancements to mitigate adverse impacts to coastal resources. For example, coastal resource enhancements required in the SRAs will include the following hierarchy of improvements, from highest to lowest priority/importance in relation to mitigating coastal resource impacts:

- Not happening per City*
- Removal of shoreline protection devices at publicly or privately owned sites anywhere in Pacifica.
 - Modifying existing shoreline protection devices to implement nature-based solutions anywhere in Pacifica.
 - Maintenance or alteration of existing shoreline protection devices to expand public coastal access including but not limited to trails and beach access within the SRA.
 - Acquiring and conserving undeveloped coastal properties within the SRA.
 - Enhancing visitor amenities within the SRA.

* Opportunities to remove or modify existing shoreline protection devices are expected to be very limited, underscoring the importance of these devices to protect existing development in the SRAs and elsewhere. Therefore, most of the City's efforts to enhance coastal resources in the near- and medium-term are expected to focus on visitor-serving amenities enhancements. Visitor-serving amenities improvements will be decided during a community engagement process as a post-LCLUP certification program. Visitor-serving amenities can include improvements to trails and beach access, acquiring and conserving undeveloped coastal properties, and enhancing the coastal visitor experience by providing or enhancing public restrooms, covered picnic areas, and bike parking, among many other potential coastal visitor amenities. Once the scope and type of coastal resource enhancements are known, the City must then commit to seek funding and implement appropriate projects. The City's progress in implementation will be subject to periodic review by the CCC. Lack of substantial progress implementing the required improvements could lead to suspension of the SRAs until required

*

improvements are implemented.

Adaptation Measures in the SRAs

In contrast to the above-described coastal resource enhancements, that will likely be primarily City-led as City-sponsored projects, the implementation of adaptation measures during the development review process is anticipated to be led primarily by private property owners because of the significantly larger number of privately-owned properties compared to publicly-owned properties within the SRAs. This will occur as private property owners submit applications for development within the SRAs. Adaptation measures would be focused on the development site and would include consideration of reduction or removal of nonconformities as well as waivers from development standards.

The need to correct or reduce existing nonconformities would be triggered by projects meeting the definition of Substantial Structural Modification. Typical nonconformities related to coastal hazards that may be reduced or removed during the development review process include increasing nonconforming setbacks to situate development farther from wave overtopping or coastal erosion; or, removal of excessive lot coverage to minimize the extent of structural exposure to wave overtopping, coastal erosion, or flooding.

Similar to the hazard reduction approach associated with reduction/removal of nonconformities, the City would be required to consider waivers of development standards to minimize exposure of development to coastal hazards and to facilitate longer-term adaptation strategies. Examples of development standard waivers could include allowing greater height in order to minimize development on areas of a site closest to wave overtopping, erosion, or flooding hazards; reduction in off-street parking requirements to create more space for adaptation on-site or to make adaptation easier to implement in the future (e.g., allowing a carport instead of a garage).

Removal of Development Significantly and Recurrently Damaged by Coastal Hazards

A main objective of the SRAs is to enable development in reliance on existing shoreline protection devices, an objective that would not ordinarily be consistent with the Coastal Act. However, the protection provided by existing shoreline protection devices is not uniform for all properties and all hazards, for example, when some properties closest to the shoreline are subject to wave overtopping and/or flooding during storm events, while others farther from the shoreline are not. Therefore, there may be areas within the SRAs that are periodically damaged by coastal hazards, such as oceanfront businesses in the Rockaway Beach commercial district and single-family residences in northern portions of West Sharp Park where windows, walls, and other elements of those buildings are damaged or destroyed and require replacement. Alternative modifications considered to be part of the set of SRA policies would include a requirement that development in the SRAs would modify or, if necessary, remove structures that experience recurrent, substantial coastal hazard damage above certain established thresholds. This provision provides an important feedback mechanism to the SRA policies to address situations where, despite the presence of shoreline protection, development cannot reasonably be allowed to remain on a site due to the significant threat to life and property.

Community Roundtable Discussions

Public input in response to the SRA provisions outlined in Attachment A is a critical part of the LCLUP update process. Meeting #2 is the first time the SRA provisions will be available for public review, providing a unique opportunity to convene the community and discuss them. The meeting will begin with an optional dinner for attendees, followed by an initial staff presentation. The meeting will then transition to the community roundtable portion to provide a venue for the community to discuss the draft alternative modifications related to SRAs and for persons with

varied viewpoints to provide input on this potential approach, all while enabling the City Council to observe the diversity of discussions. Following the community roundtable portion, there will also be an opportunity for public comments on items discussed during the meeting or other areas of potential discussion during Meeting #3.

Each table will include a facilitator and note taker, with a focus of a manageable number of participants at each table to maximize the opportunity for dialogue (dependent on the level of public attendance at the meeting). Participants should be prepared to engage in a comprehensive discussion on the benefits and drawbacks of the SRAs, provide ideas on how to improve the draft SRA policies, consider whether the SRA approach is a worthwhile compromise to achieve the overall goal of LCLUP certification, and provide suggestions for other alternative modifications directly addressing the CCC Suggested Modifications that may not have been specifically identified for discussion at the meeting. This will enable staff to provide further analysis of other suggested modifications of interest to the community as part of Meeting #3. The dedicated notetakers at each table will also ensure comments are captured and characterized effectively.

All of the discussions will be summarized in a written report that will accompany the Meeting #3 staff report. The feedback received will also inform further analysis and development of the alternative modifications that will be discussed by City Council at Meeting #3.

Future Meetings

This community roundtable is the second of three community engagement meetings planned to conclude the LCLUP certification process. The next meeting, Meeting #3, will be a City Council consideration item to discuss and approve submission of a comment letter from the City to the CCC requesting revisions to the CCC Suggested Modifications. The meeting is tentatively scheduled for late-January/early-February 2024. This meeting will consider other potential alternative modifications beyond those associated with the SRAs that are the focus of Meeting #2. As staff noted during the November 13, 2023 study session, many of the other CCC suggested modifications not highlighted during the study session are minor in nature, either deleting or adding a word or phrase. However, staff values public input identifying any suggested modifications proposed by CCC staff with thoughts on how the City may propose an alternative modification. Any public comments received on alternative modifications will be considered by staff and presented to the City Council during Meeting #3.

ALTERNATIVE ACTION:

No alternative action has been identified.

RELATION TO CITY COUNCIL GOALS AND WORK PLAN:

The Local Coastal Land Use Plan is consistent with the following item(s) in the Council-adopted Strategic Plan and Priority Work Plan for FY 2023-24:

- Goal 4: Pursue climate change adaptation and mitigation.
 - Strategy C: Update Pacifica's Local Coastal Plan and improve communications and collaboration with the California Coastal Commission.

FISCAL IMPACT:

There is no direct fiscal impact from this item.

ORIGINATED BY:

Planning Department

ATTACHMENT LIST:

Attachment A - DRAFT Special Resiliency Area Policies (Alternative Adaptation Strategies)
(DOCX)

Attachment B - West Sharp Park SRA (PDF)

Attachment C - Rockaway Beach SRA (PDF)

Honey, Julian@Coastal

From: ExecutiveStaff@Coastal
Sent: Wednesday, April 30, 2025 2:43 PM
To: Ringuette, Oceane@Coastal; Honey, Julian@Coastal
Subject: FW: Meeting on Thursday, May 8, 2025, Item #9: City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update
Attachments: wetlandsMay3201410-41-41 GMT-0700.pdf; Calson Letter Jan 2008_redact_ditching 2008.pdf

Fyi -

From: Danny Estrella <warnella@hotmail.com>
Sent: Wednesday, April 30, 2025 1:48 PM
To: ExecutiveStaff@Coastal <ExecutiveStaff@coastal.ca.gov>
Subject: Meeting on Thursday, May 8, 2025, Item #9: City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update

30 April 2025

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

Re: Meeting on Thursday, May 8, 2025, Item #9: City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update).

Dear Coastal Commission Representatives,

The above referenced land use plan has been submitted to the CCC for review and approval. I'm writing to express my concern about the land use designation for the land located along San Pedro Road in the south region of Pacifica. This particular property is referred to as the land of Ron Calson or the Calson property. The LCLUP includes a change to the zoning for the Calson property from commercial recreation to allowing for some level of housing. This land has limited ingress and egress such that vehicular traffic is overwhelmed regularly during commute periods and every weekend with the regular high use for parking and access to the adjacent Linda Mar State Beach. This is a safety concern for residents needing to leave the neighborhood. The local Pedro Point community, as well as Pacifica City residents-at-large, have opposed development to this property for over 20 years. This has been reported previously to the CCC.

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

As this land is just a few feet above sea level and within 50 yards of the shoreline it will be in the coastal flooding zone as sea level rises. Sea level rise combined with local storm runoff, flooding and liquefaction increase the risk to people and property in this area.

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

This land was included in the USF&W Service National Wetlands Inventory October 16, 2011, and the USGS National Page map, which I've attached for your reference. I want to inform you that the land was ditched and drained by the City of Pacifica on November 30, 2007, as a service for Ron Calson, the property owner. I've attached a copy of a letter, dated January 10, 2008, from Van Ocampo, P.E., the Deputy Director of Public Works and City Engineer for the City of Pacifica confirming that this work was done. I understand that this kind of work in the Coastal Zone requires approval from the California Coastal Commission. Is this correct? The City of Pacifica cannot produce a permit from the CCC for this work. This work may have been done without a permit. Also, in section 1.5, page 9 - 'Wetland context and cumulative impacts: environmental setting of Pedro Point' of Peter Baye's letter to Lee Diaz, Associate Planner, City of Pacifica, dated July 7, 2014 (previously submitted), Dr. Baye describes the wetlands character of the Calson property and documents witnessing draining of the land. The land has since been taken out of the USF&W Service National Wetlands Inventory. The illegal ditching may have resulted in the change of designation by the USF&WS.

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

A second issue is what the City calls Special Shoreline Resiliency Areas (SSRAs). It's stated that SSRAs are to be for a limited period of 20 years, but they come with huge obligations by the City of Pacifica that haven't been determined and will have a significant cost to them. These policies have the potential to undermine the entire Coastal Act, allowing for NEW DEVELOPMENT behind shoreline protection devices (aka seawalls, rip rap, hard armoring). These are NOT needed. I urge the California Coastal Commission to see through this ploy and reject SSRAs.

There is another section of coastal land that is of concern: the Rockaway Quarry and Headlands. The LCLUP includes a change to the Quarry providing the City of Pacifica with assumption of Coastal Development Permits (CDPs) for the Quarry. The Quarry has historically been in an area of deferred approval - the new proposed LCLUP changes this, giving primary control to the City of Pacifica. I oppose any development on the Rockaway Headlands.

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

Kind regards,

Danny Estrella
114 Kent Road
Pacifica, CA



Scenic Pacifica

CITY MANAGER'S OFFICE
TEL (650) 738-7301
FAX (650) 359-6038

CITY ATTORNEY
TEL (650) 738-7409
FAX (650) 359-8947

CITY CLERK
TEL (650) 738-7307
FAX (650) 359-6038

CITY COUNCIL
TEL (650) 738-7301
FAX (650) 359-6038

ENGINEERING
TEL (650) 738-3767
FAX (650) 738-3003

FINANCE
TEL (650) 738-7392
FAX (650) 738-7411

FIRE ADMINISTRATION
TEL (650) 991-8138
FAX (650) 991-8090

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TEL (650) 738-7303
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& RECREATION**
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• Building (650) 738-7344
• Code
Enforcement (650) 738-7343

POLICE DEPARTMENT
TEL (650) 738-7314
FAX (650) 355-1172

PUBLIC WORKS
TEL (650) 738-3760
FAX (650) 738-9747

CITY HALL

170 Santa Maria Avenue • Pacifica, California 94044-2506

www.ci.pacifica.ca.us

ph file

January 10, 2008



Mr. Ronald W. Calson

Dear Mr. Calson:

I am writing to confirm the completion of the City's work on the berm on your property on San Pedro Avenue, as discussed with you and your attorney on October 4, 2007.

As you recall, the City agreed to make several cuts in the low berm separating your upland property from the ditch that runs roughly south to north along the eastern edge of the property. We agreed that the City would make the cuts in accordance with plans prepared by your engineer, and at locations marked by your engineer on the property itself, to allow rainwater drain from the upland into the ditch. On November 30, 2007, a crew from the City made the cuts in the berm in accordance with your engineer's plan and markings on the property and also cleared debris from the swale that abuts the southern edge of your property to allow water to flow through it unimpeded. The City is responsible for maintaining this drainage swale and will continue to periodically monitor and remove debris from it as necessary.

I understand that you have further concerns about excessive water on your property. On December 17, 2007, I visited the property. I saw that someone had attempted to clean out the culvert running under the driveway that allows vehicular access to the property from San Pedro Avenue. The culvert had previously been half filled with sediment, which significantly reduced its capacity and may have caused stormwater to back up onto your property.

The City recommends that the culvert be periodically cleared out to ensure that water is able to flow through. Because the purpose of the culvert is to allow your driveway to pass over the drainage swale that abuts the southern edge of your property, maintenance of the culvert is your responsibility as the property owner. Beyond



Mr. Ronald W. Calson

January 10, 2008

Page 2

periodic maintenance to ensure that the culvert is not obstructed, you may also wish to consult your engineer about whether the culvert is sufficient in size to handle the flow of storm water.

As we discussed at the October 4 meeting, a comprehensive stormwater management plan would be a natural part of any development application for the property. The City is happy to work with you on any such application and stormwater plan.

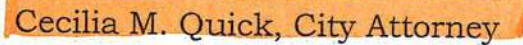
Sincerely,



Van Dominic Ocampo, P.E.

Deputy Director of Public Works and City Engineer

VDO

c:  Cecilia M. Quick, City Attorney

Matthew D. Zinn

Shute Mihaly and Weinberger LLP





U.S. Fish and Wildlife Service National Wetlands Inventory

USF&WS wetlands
San Pedro Field

May 3, 2014



Wetlands

- Freshwater Emergent
- Freshwater Forested/Shrub
- Estuarine and Marine Deepwater
- Estuarine and Marine
- Freshwater Pond
- Lake
- Riverine
- Other

This map is for general reference only. The US Fish and Wildlife Service is not responsible for the accuracy or currentness of the base data shown on this map. All wetlands related data should be used in accordance with the layer metadata found on the Wetlands Mapper web site.

User Remarks:

Image captured on 3May2014, <http://www.fws.gov/wetlands/Data/Mapper.html>

From: [Dinah Verby](#)
To: [NorthCentralCoast@Coastal](#); [Pacifica LUP Update](#)
Cc: [Dinah F Verby](#)
Subject: Fwd: Thurs. May 8 Agenda Item 9a, City of Pacifica LCLUP
Date: Friday, May 2, 2025 2:40:37 PM
Attachments: [2023-12-05 City Council - Hlghlighted Full Agenda-1508.pdf](#)

Honorable Commissioners:

I am a Pacifica resident. Overall, I am very pleased with the LUP update and its provisions strengthening the protection of our coastal resources, ESHA, and sensitive habitats. I commend the staffs of the City of Pacifica and Coastal Commission for all their efforts.

However, there are three items I believe should be changed:

- 1) The Special Shoreline Resilience Areas (SSRA's) in Rockaway and West Sharp Park are outright violations of the Coastal Act and, if adopted, would set a terrible precedent that would literally open the floodgates to new and prolonged armoring along the entire California coast.
- 2) The undeveloped San Pedro Avenue Site (aka Pedro Point or Calson Field) described in Policy LD-I-21 is improperly upzoned and should either retain its current Commercial zoning or be designated "Conservation" due to its location in a severe flooding area and the presence of wetlands and ESHA on that site.
- 3) The Rockaway Quarry is currently an Area of Deferred Certification (ADC) that would be included in the certified LUP update. That property contains ESHA, wetlands and other unique coastal resources. Though zoned commercial, there is now a "builder's remedy" application to build over 1,000 residential units in the Quarry, and the City's ability to deny or condition that project is very limited under some of the new state housing laws. Please consider whether the Quarry's coastal resources might be better protected and preserved if it remains an ADC, subject to Coastal Commission's original permitting authority rather than the City's.

SSRA's Should Not be Approved

The SSRA's would not only allow repair, replacement and expansion of the existing seawalls in Rockaway and West Sharp Park, but also permit new development in those areas to rely on the seawalls – even, apparently, for non-coastal dependent uses -- all of which is prohibited by the Coastal Act. It defies logic and common sense to intensify development in these identified vulnerability zones. SSRA's would (a) place more property and people at risk from the increasing coastal hazards; (b) increase dependence on the seawalls; and (c) decrease the city's incentive and ability to remove armoring, which is one of the stated mitigations or trade-offs for the SSRA's.

It is also inequitable to single out these two areas for special treatment, when other parts of Pacifica's coastline are also highly vulnerable to sea level rise, bluff erosion, etc. (e.g. Palmetto Avenue and upper Esplanade where buildings fell into the sea).

Furthermore, the "mitigations" required of the City as trade-offs for the SSRA's

are ill- defined, inadequate and mostly infeasible. For example, even while acknowledging that one of the mitigations is “removal of existing armoring,” city staff conceded in a December 5, 2023 staff report that removal of armoring is unlikely:

“Opportunities to remove or modify existing shoreline protection devices are expected to be very limited, underscoring the importance of these devices to protect existing development in the SRAs and elsewhere. Therefore, most of the City’s efforts to enhance coastal resources in the near- and medium-term are expected to focus on visitor-serving amenities enhancements.” (Page 6, City Staff Report December 5, 2023, submitted with this email).

Like most cities, Pacifica is facing large budget deficits. It’s highly doubtful that Pacifica has the capacity to create a new Coastal Access Resilience Program and plan for and build new coastal access enhancements as “mitigation” for the SSRA’s. While I concur that substantial trade-offs should be required IF the Commission allows the SSRA’s, the City’s expenditure of money and resources for mitigations in the short-term seems like a misallocation of resources, and could be counterproductive to the long-term goal of adaptation planning with less reliance on armoring.

Disallow Coastal Residential Mixed-Use Zoning on Pedro Point Field (Policy LD-I-21)

The staff report notes that this undeveloped site contains wetlands and ESHA supporting California red-legged frog habitat which could constrain the development potential of this site per the required protections and buffers for ESHA and wetlands found in Chapter 4 (Environmental and Scenic Resources). It also floods during winter rains. ***The field is one of the few undeveloped sites with significant potential for nature-based solutions*** and should be targeted for potential acquisition and conservation. Upzoning it for more intense development would make it more expensive and less feasible to achieve that goal, contrary to the intent of the LUP update.

Thank you for your consideration.

Dinah Verby

Honey, Julian@Coastal

From: ExecutiveStaff@Coastal
Sent: Thursday, May 1, 2025 2:29 PM
To: Honey, Julian@Coastal; Ringuette, Oceane@Coastal
Subject: FW: Please reject Pacifica's seawall request

Fyi -

-----Original Message-----

From: Emily Renzel <marshmama2@att.net>
Sent: Thursday, May 1, 2025 6:59 AM
To: ExecutiveStaff@Coastal <ExecutiveStaff@coastal.ca.gov>
Cc: Justyne Schnupp, Green Foothills <justyne@greenfoothills.org>
Subject: Please reject Pacifica's seawall request

Dear Coastal Commission: Please reject the City of Pacifica's request to build a neighborhood scale seawall. It is contrary to the principal Coastal Commission goal of protecting Coastal Access and protecting our coast. Thank you.

Emily Renzel
Palo Alto Councilmember 1979-1991
1056 Forest Avenue
Palo Alto, CA. 94301

Honey, Julian@Coastal

From: Gail Benton Shoemaker <gailbentshoe@igc.org>
Sent: Friday, May 2, 2025 8:55 AM
To: NorthCentralCoast@Coastal
Subject: Thurs, May 8, Agenda Item 9a, City of Pacifica LCLUP

Dear Coastal Commission,

Thank you for meeting in Half Moon Bay so Pacificans can weigh in on the LCLUP. I have three requests-

Please retain the quarry and Sheldance as areas of deferred certification for permitting by the CCC. These areas are environmentally sensitive and need your review.

Please do not rezone Pedro Point Field. This area also contains environmentally sensitive habitat areas and is important to the neighborhood and the coastal trail.

Please do not approve SSRAs. They are not needed to protect existing pre-coastal development and infrastructure because it is already protected by the Coastal Act. We do not need new development in these areas.

Yours, Gail Benton Shoemaker

Honey, Julian@Coastal

From: Gary Furlong <garyisanalien@gmail.com>
Sent: Friday, May 2, 2025 12:02 PM
To: NorthCentralCoast@Coastal; Pacifica LUP Update
Subject: City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update) May 8 th , 2025 Agenda Item 9a

Commissioners,

I regret that I am not able to make a public comment in person or via zoom/telephone as this topic is of extreme importance to me; I hope that my letter will be read with the consideration that if it was possible I would be there in person to add personal impact to these points. My letter will be more of a general nature as some of my other neighbors have gone to great lengths to include the specific details and references to various codes and regulations. I am writing specifically in regards to the rezoning of the field on Pedro Point in Pacifica.

I have lived on Pedro Point for 25 years and it seems that this field has been a point of contention for most of that time; I find that hard to believe as it seems to me that a little bit of common sense will go a long way here. Does anyone really want to consider building houses at the bottom of a bowl where all the water from the neighborhood flows to? Seriously? It is the lowest point in the entire neighborhood and is at sea level; the water is funneled directly onto the field, the field then acts as a sponge doing what it naturally wants to be: a wetland. In this sense the field can help prevent flooding for the surrounding homes and streets, up until it then becomes saturated and is itself then flooded with standing water over the entire area, which is common during the rainy season. Knowing everything we know now along with the dangers of SLR do we build in flood plains and coastal wetlands? Pacifica's already over burdened sewage system cannot handle more stormwater. There are already signs asking that during storms we do all we can to lessen the impact on our sewage system and yet now we're going to significantly increase this by trying to drain a floodplain during winter storms? I would strongly encourage the commissioners to consider going out and looking at the field; I think a quick look will put argument to rest permanently.

Any construction in the field will cause water to flow into the stream on the eastern side of the field where there is sensitive habitat and flood existing homes and streets to the south and west. This water (contaminated with household/car waste) will overwhelm the habitat of the red legged frog and then this water will continue to overflow in the neighborhood flooding our homes. Frequently Linda Mar beach is already listed as heavily polluted due to runoff from a different creek; is the idea that since this beach is already polluted what's the problem with more?

As has been pointed out in other letters, part of this field was once a sewage disposal pond. Nothing has been done to understand its implications-

For many, many years this field has been used as a public walking path in several different directions. Paths are literally worn into the earth.

Pedro Point is a neighborhood with one two lane road servicing the entire neighborhood. On busy beach weekends that road is frequently reduced to one lane as cars use the road itself to park on (the city has

told me that they don't have time to ask the CCC's permission to put a stop to that). That one road is also the only road that services our very vibrant shopping center's parking lot. On top of all of this, Pedro Point was recently designated as a "high fire risk". So the entire neighborhood, the entire shopping center's parking lot and one entire official beach parking lot are all serviced by one road. The situation is already incredibly dangerous as it's already impossible to evacuate the neighborhood in a timely fashion in the event of a significant fire; adding additional, dense housing will make this situation only more severe. Homes will be lost and people will die.

The staff of the city of Pacifica and the Coastal Commission Staff are well intentioned, incredibly hard-working people. However, they are the first to admit that they are significantly understaffed. Perhaps for the sake of efficiency they have relied on some shortcuts that have led to a conclusion about this field that I believe is completely incorrect. I am hoping that the Commissioners will review what has been suggested by the city and Coastal Staff and find their conclusions deeply flawed and direct that the city make the designation of this field something that will be appropriate for an area that is subject to frequent flooding, has the potential to wipe out the habitat of an endangered species, contribute to beach pollution and that will make it significantly more difficult to evacuate this neighborhood in the event of a fire. This site should be designated conservation.

Regards,
Gary Furlong

From: James Kremer <jamesnkremer@gmail.com>
Sent: Friday, May 2, 2025 2:56 PM
To: NorthCentralCoast@Coastal
Cc: Jim Kremer info
Subject: Thurs, May 8, Agenda Item 9a, City of Pacifica LCLUP

Chair Cummings and the Coastal Commission:

Thank you for your patience – Most of what follows is a copy of my oral comments at the April meeting. I hope it may be helpful to have this in the record for this meeting as well – & I have added a few notes ...

I am pleased that Pacifica's LCLUP is coming before you. I have tried to follow the exchanges between CCC Staff and our city officials for more than 5 years, most of which showed little progress. Without constructive suggestions, by your Staff I do not believe we'd have made it. Thanks to you and your Staff. for standing firm to protect our coastline, and preserve it for future generations.

I know our city was not very cooperative with CCC Staff for years. Indeed it is significant that when our LCLUP was finally submitted in July 2020 it was essentially unchanged despite extensive discussions and repeated substantive guidance/suggestions by CCC Staff over 5 years (or more). Progress was only made when, for the March 8, 2023 meeting, CCC Staff accepted and filed the submission, but recommended rejecting it, and offering CCC Staff offered a complete rewrite as a viable alternative. That version was the basis for the document we are now considering.

Much of the current draft has merit, but the SSRAs are a clear exception. I and many feel they are not in the interests of most of residents. Far worse, the SSRA element weakens the Coastal Act and challenges the essential oversight by the CCC to protect our coast in the interests of all.

It concerns me deeply that the SSRA concept seems to be gaining momentum, partly because it has been pushed so doggedly by some proponents, and partly as part of a clear assault on the Coastal Act and the authority of the CCC itself.

For many public meetings by the City, I offered comments on strengths and weaknesses in the emerging draft. However, the rest of my comments here focus only on one major issue of whether the public, and specifically the residents of Pacifica, favor or oppose the SSRAs. I've added emphasis to support my assertion that SSRAs face widespread public opposition.

SSRAs were a late addition. Most importantly, please understand that SSRAs were never favored by most Pacificans who engaged in the process. Even with extensive attempts by city officials to explain them at public information meetings and Council meetings, the majority of public comments and letters strongly oppose the whole concept – although interestingly the basis for objection differed starkly across the strongly polarized public.

Yet I understand that the city claims that the SSRAs have wide public support. This clearly was not and is not now the case. You have probably seen the hard evidence for this last assertion for yourself if you have skimmed the lengthy records of voluminous public input available to you – most is overwhelmingly negative. Further, late in the process, even the deliberations by City Council were marked by confusion and frustration over whether and why this unprecedented condition might be included.

Even Council was not unanimous. Two were opposed and a third expressed confusion and passively acquiesced.

SSRAs are not “neighborhood scale adaptation.” They are a carve-out to armor coastline explicitly to facilitate increased, new, non-coastal-dependent development. While not explicitly stated, it is hoped that renewal would allow the amour in perpetuity. This is not consistent with the Coastal Act, and not in the general public interest.

I worry about the precedent these exceptions would create.

In its deft guidance, Coastal Commission staff consolidated all of the SSRA conditions (in Ch. 6 on Coastal Hazards). I urge you support the hard won LCLUP for Pacifica, but only if modified to remove the SSRAs!

Sincerely,

James Kremer, Ph.D.

Professor of coastal Oceanography, emeritus (U.S.C. and UConn)

Resident of Sharp Park, Pacifica since 2008

Chosen to serve on Pacifica’s Community working group on Sea Level Rise (2019)

Honey, Julian@Coastal

From: Jeff Guillet <jguillet@expta.com>
Sent: Sunday, May 4, 2025 10:47 AM
To: ExecutiveStaff@Coastal
Cc: Honey, Julian@Coastal; Rexing, Stephanie@Coastal; Ringuette, Oceane@Coastal
Subject: Opposition to City of Pacifica LUP Update - Urge Disapproval

Follow Up Flag: Follow up
Flag Status: Completed

Dear Chair Dr. Cummings and Commissioners,

I am writing to express my strong opposition to the proposed Local Coastal Land Use Plan (LCLUP) update for the City of Pacifica. This document is riddled with contradictions, vague language, and an overall lack of clarity, making it virtually impossible to implement effectively.

The LCLUP repeatedly claims to be based on the “best available science,” yet it fails to incorporate updated climate research and the most current coastal hazard data. Instead, it relies on outdated information and flawed assessments that do not reflect the latest understanding of sea level rise, tsunami risks, or coastal erosion patterns. This glaring inconsistency undermines the credibility of the plan and calls into question its effectiveness in protecting Pacifica’s coastal communities.

Rather than serving as a rational and cohesive land-use policy, this LCLUP has turned into a confusing mess. It contains arbitrary development restrictions based on uncertain tsunami risk assessments, including provisions drafted with amateurish methodology. Furthermore, it appears that the Coastal Commission is overstepping its role—this is not a matter of remodeling communities but rather ensuring sound coastal policies that protect both property owners and the environment.

The inconsistency of the proposed regulations, coupled with their disproportionate impact on existing property owners, is deeply troubling. The Coastal Commission should reject this plan outright and demand a more rigorous, professionally drafted alternative that does not arbitrarily impose vague and excessive restrictions.

I urge the Commission to **disapprove** this LCLUP and require a plan that reflects sound policy and truly utilizes the most current scientific data rather than reckless overreach.

Thank you for your time and consideration.

Sincerely,
Jeff Guillet
284 Seaside Dr.
Pacifica, CA 94044

Honey, Julian@Coastal

From: Travis, Galen@Coastal
Sent: Wednesday, April 30, 2025 4:01 PM
To: Honey, Julian@Coastal
Subject: FW: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

-----Original Message-----

From: jlg95124@everyactioncustom.com <jlg95124@everyactioncustom.com>
Sent: Wednesday, April 30, 2025 12:11 PM
To: NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

I urge you to:

- Reject Pacifica's SSRA policy as currently drafted;
- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
- Require meaningful, site-based mitigation for any shoreline protection proposal;
- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,
Jennifer Green
4904 Rafton Dr San Jose, CA 95124-5220
jlg95124@yahoo.com

Ringuette, Oceane@Coastal

From: Joanne Gold <joannegold@yahoo.com>
Sent: Friday, May 2, 2025 4:40 PM
To: NorthCentralCoast@Coastal
Subject: Thurs, May 8, Agenda Item 9a, City of Pacifica LCLUP

Dear Commissioners,

I am writing regarding the City of Pacifica's 2025 LCLUP – my comments are that of a private citizen, but I note that I've served on the Board of the Pedro Point Community Association (PPCA) for more than 15 years. The PPCA is an all-volunteer nonprofit org that serves as a strong and well-informed voice for Pacifica's Pedro Point neighborhood, so my perspective is informed by a deep familiarity with community sentiment and local land use issues related to the LCLUP

The City of Pacifica has asserted that there is broad community support for:

- 1) The proposed land use designation change to "Coastal Residential Mixed Use" (CRMU) for the undeveloped San Pedro Avenue site (LD-I-21) in Pedro Point
- 2) The concept of Special Shoreline Resiliency Areas (SSRAs)

These claims are categorically false. There is *not* broad community support for either of these proposals!

As a resident of Pedro Point which will be directly negatively impacted by land use changes to the San Pedro Ave. site (locally referred to as the Pedro Point Field & Wetland), I'm directing the bulk of my comments towards that issue. But want to state for the record that I – and many, many, Pacifica residents – oppose the introduction of SSRAs into the LCLUP.

Regarding the San Pedro Avenue field... For decades, Pedro Point residents—and many others throughout Pacifica—have consistently, clearly, and emphatically opposed any form of residential land use of this parcel.

Since 2011, this opinion has been stated in **hundreds of comment letters**, through remarks **delivered in person by large numbers** at City Council and Planning Commission meetings, and in **community forums** collecting feedback for the GPU/LCLCP process.

The community - and scientific experts who have also submitted professional comments – all cited significant adverse biological/ESHA impacts, flooding/water table, safety hazard impacts, traffic impacts, and more, as reasons for opposing any form of residential land use of the San Pedro Ave. field.

Most importantly – all recognize that **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 California red-legged frog (CRLF) feeding and movement habitat*
- A seasonal wetland habitat*
- A floodplain for run off from the surrounding community
- An access point to Linda Mar beach (which the LCLUP maps have incorrectly coded as a "view point")

*(The CCC documented the wetlands condition and existence of CLRF/ESHA in its Jan. 25, 2021, technical analysis of the ecological resources for proposed development at the adjacent 505 San Pedro Avenue parcel APN 023-72-010)

ANY form of residential development (CRMU) is reasonably likely to cause direct and indirect significant negative impacts. The Coastal Commission exists to provide a check on precisely this kind of abuse of land use planning in the coastal zone.

Your mission states that you are “committed to protecting and enhancing California’s coast and ocean for present and future generations. It does so through **careful planning** and regulation of **environmentally-sustainable development**, rigorous use of **science**, strong **public participation**, education, and effective intergovernmental coordination”

Please uphold your mission!

Land use change to any kind of Residential development on this parcel...

- DOES NOT demonstrate careful planning
- DOES NOT support environmentally-sustainable development
- DOES NOT align with the science presented by experts
- DOES NOT reflect extensive public participation and community feedback provided for decades – and still today - which strongly supports Conservation (C) or Low-Intensity Visitor Serving Commercial (LIVC) land uses for this parcel

You now have the opportunity—and the responsibility—to reject this proposed land use **of the San Pedro Ave. field in the LCLUP**. From where I stand, doing so is both your mission and your moral obligation.

Respectfully,
Joanne Gold
251 Stanley Avenue, Pacifica , CA

(25 year resident)

Ringuette, Oceane@Coastal

From: Lawrence Bothen <lbothen@sbcglobal.net>
Sent: Friday, May 2, 2025 2:35 PM
To: Pacifica LUP Update
Subject: Pacifica LCP-2-PAC-23-0056-3

Please distribute these comments for review to the Commissioners.

May 1, 2025

California Coastal Commission

Pacifica LCP Amendment No. LCP-2-PAC-23-0056-3

Dear Commissioners,

After years of endless debate, Pacifica's much maligned, oft revised LCP is finally on your desk. It is unrecognizable to the many citizens who agreed on the 2020 draft that you rejected. What you see before you is the work of a city staff bending over backwards to meet every demand of Commission staff and fit it into a managed retreat narrative. Pacifica had been ordered to prepare a future as though no shoreline protections exist.

To create an appearance of flexibility the City was allowed to propose two Special Shoreline Resilience Areas, SSRAs, in Rockaway Beach and on Beach Bl. in Sharp Park. Both areas have existing armoring, notably a crumbling seawall on Beach Bl. The SSRA proposal would allow them to keep and possibly augment their armoring to protect these vital areas.

Problem is, their lifespan is only 20 years, a seemingly generous grace period to protect existing infrastructure like water and sewer lines, pump stations, gas and telecom, while we figure out how to end Pacifica. But what about the rest of Pacifica? That infrastructure runs the length of Palmetto Av. through the Manor.

Is some infrastructure more worthy of protection than others? Article 4, Section 30235 of the Coastal Act says "revetments, breakwaters, seawalls and other construction SHALL BE PERMITTED when required to serve coastal dependent uses or PROTECT EXISTING STRUCTURES, or public beaches." Seems pretty clear that applies to the entire coast of Pacifica. In that light it's absurd not to consider that what that infrastructure serves is infrastructure too: homes, businesses and public facilities. They all exist to serve people. If the former is allowed the latter must be included too.

The Sharp Park SSRA only extends the length of Beach Blvd., so the golf course berm is not protected and consequently, neither is the Fairway Park neighborhood, a mid-1950's subdivision that lies just south of the golf course. This leaves the entire area, including the SSRA, vulnerable to flooding from storm surges that pour through the Clarendon gap. And since the berm and golf course are in San Francisco's jurisdiction they could be ordered out of existence at any time, negating any protection provided by the SSRA. If you're going to have an SSRA it should extend south to Mori Point.

The SSRA's are further complicated by a set of byzantine restrictions that are a monument to bureaucratic overreach. Home and business owners are restricted from performing even routine maintenance that exceeds certain limits. A subset of rules is classified as Substantial Structural Modifications (SSM), which include essential repairs like replacing a roof if it needs new joists or sheathing, replacing a garage door, new solar, electrical upgrades or plumbing repairs.

These would require a Coastal Development Permit to be approved before a building permit is issued. It could lead to an environmental review, geologic survey or both. God forbid you're near an ESHA. Worse, the owner must sign a waiver surrendering any right to shoreline protection and is subject to deed restrictions. That's asking a lot for very little protection and less certainty. And the whole rug gets pulled out from under you in 20 years or less, depending on the whims of the Commission.

What do you suppose that will do to property values, or the ability to get a loan for major repairs or remodeling? Economics 101 says banks will not loan money on properties that are not insurable. End result, they're both running for the exits. Property values collapse. Home and business owners are driven out. Your policies indicate that is what you want. But with their life's work and savings on the line, maybe they band together and file a class action suit against Pacifica, but also the Coastal Commission and even the state, who mandated this egregious violation of property rights.

This level of CCC oversight will essentially wipe everything west of Highway One off the map, where the vast majority of Pacifica's tax generating businesses, especially tourist businesses, and a lot of its population reside.

Sharp Park and Rockaway Beach are visitor serving areas that draw a lot of people to Pacifica, and they could draw a lot more if the City were allowed to go forward with its Sharp Park Specific Plan for a new, higher seawall on Beach Blvd and a revamped promenade that connects to the golf course berm. With greater accessibility to people of all ages and abilities it promises to put the shore within reach of everyone.

If the CCC's goal is to provide greater access to the shore for people all over the state and the world, this is how you do it. Yet this plan which the city has spent millions developing is threatened by CCC directives that contradict its goals.

So whose side are you on? The people's? Or is reducing Pacifica to a ghost town your own private vanity project, to return Pacifica's coastline to some pre-Colombian state that doesn't exist anywhere anymore? Is this the template for all of California's coastal cities?

Should the Coastal Commission, in lockstep with the Surfrider Foundation and the Sierra Club, be the sole arbiters of the coast's future? What about the 68% of California's population that lives next to it? We own it or live on it. Despite your omnipotence you do not have the power of eminent domain. That is left to cities, and they don't have the money to seize private property to fulfil your craving for beaches uber alles when they are mandated by the Coastal Act and our state and federal constitutions to pay fair compensation for it.

Pacifica's beaches, trails and many other natural attractions are a magnet for the Bay Area and beyond. In consideration of Pacifica's unique accessibility to the Bay Area I therefore urge you to table this LCP and allow Pacifica to draft a document that does justice to the people who live here, not just the people who use it.

Sincerely,
Lawrence Bothen
Pacifica

Pacifica City Council
1800 Francisco Boulevard
Pacifica, CA 94044
publiccomment@pacifica.gov
CC: California Coastal Commission Staff

Date: June 26, 2024

Subject: June 26, 2024 Special Council meeting: Consideration of a Resolution Certifying the Revised Certification Draft Local Coastal Land Use Plan (LCLUP)

Dear City Council:

The current draft of Pacifica's Proposed LCLUP is fatally flawed and requires multiple changes due to the current draft's CEQA and Coastal Act violations. These fatal flaws would require the full revision of Pacifica's 2040 General Plan as it will not align with the LCLUP once the CEQA and Coastal Act (CA) violations are rectified.

Staff is conflating land use plan designations in the LCLUP to requirements for project permit-level environmental review. Inherently, projects are speculative and planning around a speculative project is circuitous and prejudicial. It assumes impacts caused by a project will be feasible to mitigate, which is the reverse of mitigation sequencing to first avoid, then minimize, and as a last resort compensate for unavoidable impacts; in other words the city is setting itself up for a taking. The LCP land use designation that is supposed to build in the avoidance of avoidable impacts like placing incompatible residential development in flood-prone hazard zones that are also vulnerable to the escalating risk and conflict forced by SLR and potentially contain ESHA with protected species highlight the violations to both CEQA and the Coastal Act. These violations are not just present in the Quarry, Aramai Point and the Undeveloped San Pedro Ave Site, but also nullify any changes to the general plan outside of the Coastal Zone due to the inherent conflicts that must be rectified prior the 2040 general plan's implementation.

It is negligence by our elected officials to take direction from outside lobbying groups like SMCAR and SMART Coast so that Pacifica can be used as a test case for CEQA and CA violations to see what they can get away with at the cost of the tax payers of this city.

Also, by not acknowledging that the continued efforts to rebuild the Sharp Park seawall at a cost of over \$500 million in order to protect mostly STR properties while devastating Sharp Park Beach in violation of the CA will also bankrupt the city is willful negligence.

The previous planning director constantly stated that the LCLUP has utilized "best available science", but this is false. The willful disregard of scientific data including the biology report from the CCC biologist for the adjacent ESHA and CRLF habitat (CDP application 2-19-0026) will lead to litigation where the city again will be found liable.

Pacifica's proposed LCLUP is in violation of:

- Coastal Act (CA) Section 30240(a): ESHA must be protected against any significant disruption of habitat values, and only uses dependent on such resources shall be allowed. The city has not fully

mapped all ESHA in the CZ and has data in one specific area known as the “undeveloped San Pedro Avenue Site” from the Coastal Commission biologist (exhibit B) showing adjacent ESHA with a protected species (The California Red Leg Frog). By not acknowledging this ESHA what other ESHA sites has the city ignored? The city is also required to standardize ESHA buffer zones.

- CA (Sections 30121, 30230, 30231 and 30233) and California Code of Regulations section 13577 require wetland sites to be identified, designated AND restored as wetlands based on the latest available data including ground water data (see exhibit C).
- CEQA Guidelines, Section 15125(a)(3) explicitly prohibits use of future plans and permits as the baseline and the two preceding sections (a) (2) and (a) 1 clarify the correct baseline conditions should describe physical environmental conditions as they exist at the time the notice of preparation is published. There are at least three violations of this guideline where re-zoning and updated Land Use Designations have not considered “baseline conditions”. These identified parcels in the CZ are the sites known as the Rockaway Quarry where Planned Development is being considered, Aramai Point where commercial is being considered and the San Pedro site where residential is being considered. The city ignored flooding and groundwater data on all three sites but especially the flooding data in the San Pedro Ave site (see exhibit A and C). With the city in violation of this CEQA guideline in these three sites then where else has the city violated CEQA section 15125?
- The city is also ignoring the state guideline recommendation for 6.6 feet of SLR through 2100 from the latest 2024 California Ocean Protection Council Policy Update (*California Ocean Protection Council California Sea Level Rise Guidance: 2024 Science and Policy Update. 2024. California Sea Level Rise Science Task Force, California Ocean Protection Council, California Ocean Science Trust.*)
- The city is also required under SB379 to utilize/restore identified appropriate sites to employ as nature-based solutions for climate resiliency, yet the city is again deferring the selection of SB379 sites without explanation. The San Pedro and Quarry sites should be recorded as SB379 sites.

The fact that the Pacifica City Staff and council has consistently ignored it owns citizens who present the best available science shows that they are not listening and we will be forced to just wait for the CCC appeal process that is there to uphold the law of the state and perhaps leading to litigation is appalling. The CCC is there to protect the Public Trust and those living in the Coastal Zone knew where they live are bound by the laws of the Coastal Zone that the majority of the people of California voted for and vilifying the CCC for imaginary property rights is misleading and continues to cause harm to the city. What is sad is that those who have real fears of losing their homes are not realizing that their anger should be directed at Pacifica’s staff and council for doing the bidding of real estate lobbyists like SMCAR and SMART Coast for developers and not coming up with solutions to help its own citizens with nature based solutions versus hard armoring that will not work. Be honest with Pacificans and help the people who’s homes are vulnerable and not developers for new development that further puts us in danger.

In the Staff report for LD-I-20: Undeveloped San Pedro Avenue Site: CCC staff recommends keeping their original suggested modification from March 2023 that states “some low density” instead of the staff drafted alternative modification that proposed a specific density range. Staff strongly believes that a specified density is necessary to address community concerns regarding potential future development of the site and to assure that the City’s internal land use documents, e.g. General Plan, and LUP are consistent with regard to density designations.---Once again the city is misrepresenting what the community “concerns” are about. The Pedro Point Community Association and the vast majority of the

feedback the city has received from individuals on this parcel clearly state that the “concerns” are that residential should not be considered at all at this due to the present hazards, ESHA and protected species. The further concerns are that how the city came to the conclusion that residential is a good idea when the present conditions clearly point to a Conservation (C) LUD/zoning.

The violations to the Coastal Act, CEQA and California Code of Regulations renders the whole of the LCLUP and potentially the whole 2040 GP fatally flawed and would require a new EIR and considerable revisions to both the LCLUP and the required alignment with the 2040 GP. The city needs to stop hiding behind blaming the CCC and be accountable for following the law which is the Coastal Act and quit pretending the CCC is some out of control bureaucratic entity; The Coastal act has been law since 1979 and the citizens of Pacifica need to be educated instead the hostile environment this staff and council created which has mis-informed its residents and continued blaming the CCC for the city’s continued poor planning which only moves from one emergency evacuation to another without future planning that helps all of us. The staff and council always talk about this great relationship it has cultivated with the CCC, but in action it has never actually been there and is revisionist history that is why we are still working on this LCLUP for over 10 years and still are nowhere closer to resolution of a plan that is from 1980.

Noting that on multiple occasions the CCC Staff has requested additional data due to the extensive changes to the 1980 LCP for specific sites, including the Undeveloped San Pedro Avenue Site and the Quarry from the City of Pacifica and that multiple concerned citizens and community organizations have provided the latest environmental hazards and biology reports including those from USGS and the CCC itself, none-the-less the city continues to disregard this data. By ignoring the presented hazard and environmental restraints data for these undeveloped sites, including flooding (which includes the annual formation of a lake on the San Pedro Ave site (see exhibit A), ground water hazards, erosion, soil stability and SLR, liquefaction, tsunami danger, federally designated wetlands, as well as ESHA and protected species habitat the city is in violation of multiple CEQA and state laws. The city instead continues to attempt to change these property’s LUDs to residential and planned development although all scientific data dictates they should be designated Conservation. The City’s DRAFT Local Coastal Land Use Plan’s “Environmental and Scenic Resources” and “Natural Hazards” chapters ignore all this data for these sites and also ignores the erosion data for the area known as Aramai Point which invalidates the Land Use Designations (LUD) for these areas and may jeopardize the whole 2040 GP with these willfully misinformed policies.

On the San Pedro site the CCC has already determined *“this undeveloped site is known to contain wetlands and ESHA supporting California Red Legged Frog habitat, and the presence of such coastal ecological resources could significantly constrain the development potential of this site.”* (see exhibit B). By not acknowledging the ESHA it is a violation of Coastal Act (CA) Section 30240. The latest hydrology data from USGS also shows the groundwater hazard at both the Quarry and San Pedro sites with a very shallow water table (see exhibit C). The city is required to use the latest data available for the GPU and its EIR. The CA (Section 30121) and California Code of Regulations section 13577 would require these two sites to be designated wetlands as “lands within the coastal zone which may be covered periodically...with shallow water <and> Areas where the water table is at, near, or above the land surface at some time during each year may be identified as wetlands.” This is also required in CA sections 30230, 30231 and 30233. Since the city has chosen not to utilize this data it is in violation of CEQA and other state laws and therefore may invalidate the whole 2040 GP.

CEQA Guidelines, Section 15125(a)(3) explicitly prohibits use of future plans and permits as the baseline and the two preceding sections (a) (2) and (a) 1 clarify the correct baseline conditions should describe physical environmental conditions as they exist at the time the notice of preparation is published.

Due to the violation of this CEQA guideline the current DRAFT LUD/LCLUP is in violation of CEQA. The city is aware that it should be using existing conditions to determine the new LUDs, which would heavily favor Conservation. Section 15125 backs this view and "ensuring all biological constraints are considered" is not adequately addressed as existing conditions in the Quarry (See exhibit D for Western Pond turtle), Aramai Point and the Pedro Point site would dictate otherwise and this potentially applies to the whole of the 2040 GP and its associated FEIR. Additionally, as policy the city's GP/LCP/EIR erroneously allows a deferred analysis as "site-specific as part of proposed development review" for hazards and biological studies to be done at the time a project is proposed. The city has chosen to defer biologic and hazard analysis as policy throughout the LCLUP and the 2040 GP which potentially invalidates the whole of the 2040 GP update where the city has chosen to change LUD/zoning from the 1980 GP/LCLUP. The city is advised that this policy is in violation of CEQA and may end up invalidating the whole 2040 GPU. By changing LUDs without proper CEQA/CA review the city is also purposely setting itself up for a "taking" of private land and would therefore violate its fiduciary duty to protect the city from potential liability.

Also, the city's Sea Level Rise risk assessment to the year 2050 is inadequate due to the lack of acknowledging scientific data that we should be planning for a 100-year time horizon as dictated by design life policies.

The Coastal Act dictates how to manage development with coastal resources and public access guarantees across a physically dynamic environment. It is also the ultimate intent of the CCC to safeguard the permanent protection of the state's natural and scenic resources that are of paramount concern to present and future residents of the state, along with the necessity of protecting the ecological balance of the Coastal Zone by preventing its deterioration and destruction. Exempting the Coastal Act with the proposed SSRAs removes a substantial law that gives the CCC the ability to mitigate impacts to public access guarantees, lower-cost recreation opportunities, critical habitats such as wetlands, and sea level rise preparedness efforts. Simply because an area is being proposed for residential zoning does not mean that the zoned parcel is devoid of natural resources or public access opportunities that the city and CCC must consider prior to changing of zoning. It also does not mean that such a zoning change may avoid the impacts of climate change such as the inevitable rise in sea levels. After all, the Coastal Act purports that sound and timely scientific recommendations are necessary for coastal planning and development decisions and that the CCC should, in addition to its own expertise in significant applicable fields of science, interact with members of the scientific and academic communities, especially with regard to issues such as the cumulative impact of Coastal Zone development. By essentially exempting the Coastal Act through SSRAs it fails to give the public the legally mandated opportunity to utilize scientific information to analyze the potential cumulative impacts that future and additional Coastal Zone developments pose.

Pacifica's LCLUP and related CEQA review is fatally flawed and requires a full re-draft due to the current draft's CEQA and Coastal Act violations. These errors need to consider the impact of building seawalls that will lead to erosion to the adjacent non-hardened bluffs beyond these seawalls as well as the effect seawalls will have on beaches north and south of these seawalls and any environmental degradation

seawalls will cause. The piecemeal placement of seawalls will cause significant damage to the adjacent beaches and bluff areas do not have hard armoring. The degradation of coastal environmental and recreational assets along the coast is a violation of both CEQA and Coastal Act and these violations need to fully reviewed and rectified before this seawall plan can continue.

The proposed LCLUP are in violation of the Coastal Act including:

- The violation of CEQA Section 21081. Where by its implementation the monitoring program for hard armoring is moot because the seawalls themselves cannot avoid significant effects on the environment.
- Coastal Act (CA) Section 30240(a): ESHA must be protected against any significant disruption of valuable habitat, and only uses dependent on such resources shall be allowed. The LCLUP has not fully mapped ESHA in this area of the CZ, including in the Undeveloped San Pedro Site. The city is also required to standardize ESHA buffer zones along the beach/bluff interface which has not occurred.

The city is also ignoring groundwater data at this site that could show soil degradation in along Pacifica's coast. The latest hydrology data from USGS shows the groundwater hazard through its coSmoS database that would create an erosion hazard and become a public nuisance.

The violations to the Coastal Act, CEQA and California Code of Regulations renders the whole of the LCLUP invalid and would require a new EIR and considerable revisions to the LCLUP and the 2040 GP.

By ignoring the potential hazard and environmental restraints data in the LCLUP including ground water hazards, erosion, soil stability, SLR and potential protected species habitat the city is in violation of multiple CEQA and state laws, including the Coastal Act.

Please also see comments previously submitted by the Pedro Point Community Association (PPCA) which include input from CEQA and environmental legal experts.

Regards,

Samuel Casillas

Board member, PPCA

Past Vice-Chair, Pacifica Economic Development Committee

Past Member, Pacifica Sea Level Rise Adaptation Planning Committee

Past Co-Chair GGNRA Board Liaison Committee

Past Member, Pacifica GPU Community Outreach Committee

Exhibit A: consistent flooding of Undeveloped San Pedro Ave Site



Pedro Point Field flooding Oct 24th, 2021

Exhibit B: CCC Biologist Report findings at San Pedro Ave site with ESHA and protected species

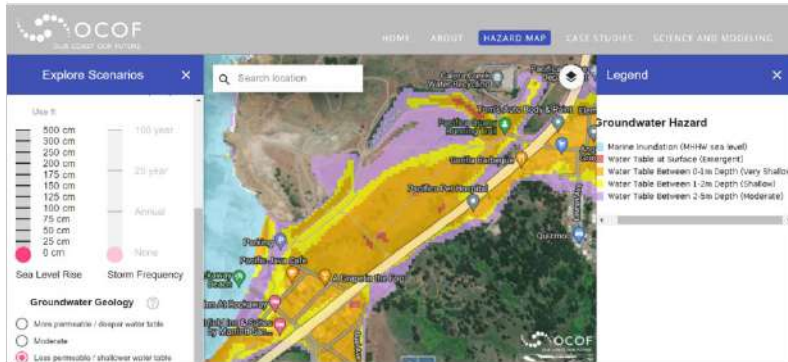
CCC Biologist Findings from its denial of an adjacent property at 505 San Pedro Ave (CDP application 2-19-0026 hearing on 3/12/21)



Dr. Lauren Garske-Garcia, Senior Ecologist at the California Coastal Commission (F15a 2-19-0026; RHODES MIXED-USE DEVELOPMENT; MARCH 12, 2021; EXHIBITS

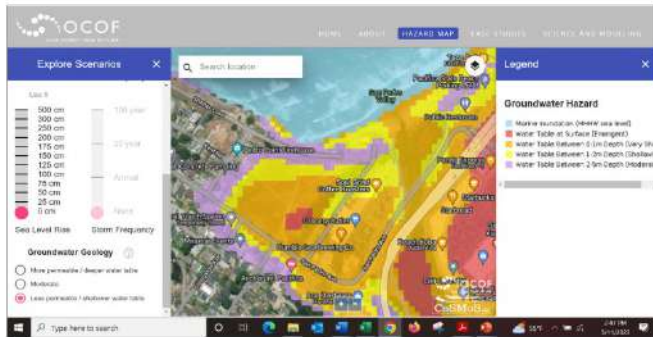
Exhibit C: Hydrology and Ground modeling by USGS OCOF CoSMoS

Groundwater Hazard at Quarry Property



Our Coast our Future: USGS hydrology modeling on Coastal Storm Modeling System (coSMoS): Quarry Hydrology

Groundwater hazard at Pedro Point Field and 505 San Pedro Ave



Our Coast Our Future: USGS hydrology modeling on Coastal Storm Modeling System (coSMoS): Pedro Point Hydrology

Exhibit D: Documented sighting of Western Pond Turtle by private citizen (to be listed by USFWS for protected status)



California Coastal Commission
c/o Julian Honey
Coastal Planner
North Central Coast District
California Coastal Commission
Via email: pacificalupupdate@coastal.ca.gov

Date: May 2, 2025

Subject: **City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)**
May 8th, 2025 Agenda Item 9a

Dear Coastal Commission:

The current draft of Pacifica's Proposed LCLUP is fatally flawed and requires multiple changes due to the current draft's CEQA and Coastal Act violations. These fatal flaws may require the full revision of this LCLUP due to the CEQA and Coastal Act (CA) violations that need to be rectified if these proposed changes are not granted. These issues are on-going and have never been addressed after multiple comment letters from the Pedro Point Community Association (PPCA) and several individuals including myself dating back to 2014. Most recently my comments were submitted at the 6/26/24, 8/12/24, 9/17/24 and 10/28/25 meetings (please see attachments for 6/26/24 letter) and they go back to 2011 when this update process started when I served on the Pacifica Sea Level Rise Adaptation Planning Committee and the Pacifica GPU Community Outreach Committee.

The PPCA has also submitted multiple letters that include opinions from CEQA expert Richard Grassetti and environmental attorney Brian Gaffney (Please see PPCA letters for the expert comments). The Coastal Commission Staff has also ignored these on-going concerns in their report and do not provide justification for the substantial changes to LUDs in multiple sites throughout Pacifica.

NOTE: In the draft LCLUP the site defined as "The Undeveloped San Pedro Site" is more accurately referred in this comment letter as "The Pedro Point Field & Wetland Site" at 315 San Pero Ave (LD-I-21).

In addition to previous comments it's been recently discovered that The Pedro Point Field & Wetland Site (LD-I-21) previously served as a sewage disposal site for the Linda Mar Valley and the Pedro Point neighborhood. Historical documented pictures from circa 1950s clearly show The Pedro Point Field & Wetland Site (LD-I-21) with a constructed retention basin (see exhibit A). USGS maps from 1956, 1968 and 1980 clearly show the field labeled as "sewage disposal" (See Exhibit B, C and D). We are skeptical that the city never had this information and demand that this documentation be included for the liquefaction and environmental hazard sections of the LUP which would greatly alter the conclusions of CCC Staff to deem this site as suitable for a LUD change to Coastal Residential Mixed-Use (CRMU). Housing construction on sewage retention ponds is severely restricted under California municipal codes since doing so would cause a severe public nuisance due to the inherent risks of ground sinking and liquefaction. Based on this omission the City of Pacifica also needs to search documentation of other sewage retention ponds that were potentially omitted in the Rockaway Quarry and Linda Mar Valley so we can have full disclosure of sewage disposal sites not documented. As part of the CEQA review, the

CCC Staff needs to analyze the implications of this information before changing any LUD and prohibit construction that can become a public nuisance.

Also, The Pedro Point Field & Wetland Site (315 San Pedro Ave) was recently been put on the market and the realtor's own environmental risk disclosers state that the environmental risk for flooding is "SEVERE" (see exhibit E). If the realtor's own disclosers state that the flooding risk in this property is severe why would the city consider a change in land use designation to residential? Why would CCC Staff agree to this?

A home adjacent to the site at 312 Kent has also been recently put up for sale and its environmental risk assessment is even more disturbing; it states that the flood severity is a 7 out of 10, includes a flood map of the field and states that flood insurance will be necessary (see exhibit F). Again I ask if these realtors are disclosing known severe flood hazard risks, why has the city omitted this data, what led to the city into thinking this is a great place for residential development and why is CCC Staff agreeing with them?

Of the many prior violations we have voiced and not addressed I would like to highlight the following:

1. CEQA Guidelines, Section 15125(a)(3) explicitly prohibits use of future plans and permits as the baseline and the two preceding sections (a) (2) and (a) 1 clarify the correct baseline conditions should describe physical environmental conditions as they exist at the time the notice of preparation is published.
 - a. Further, CCC Staff is conflating land use plan designations in the LCLUP to requirements for project permit-level environmental review. Inherently, projects are speculative and planning around a speculative project is circuitous and prejudicial. It assumes impacts caused by a project will be feasible to mitigate, which is the reverse of mitigation sequencing to first avoid, then minimize, and as a last resort compensate for unavoidable impacts. The LCP land use designation that is supposed to build in the avoidance of avoidable impacts like placing incompatible residential development in flood-prone hazard zones that are also vulnerable to the escalating risk and conflict forced by SLR and potentially contain ESHA with protected species highlight the violations to both CEQA and the Coastal Act.
 - b. Coastal Commission(CCC) Staff attempts to circumvent section 15125 by declaring that section CCR section 15251(f) allows the CCC as the CEQA reviewing agent and further invokes CEQA Section 21080.5(d)(2)(A) stating there are no significant adverse environmental effects, but in agreeing with the city for a deferred project EIR analysis while ignoring significant hazard and ESHA data that has been presented previously on multiple occasions is a violation of CEQA. The CCC Staff continues with its flawed analysis by stating that the new LUD is not drastically different from its current LUD which fully ignores the requirements under 15125 that baseline conditions as they exist shall drive any changes.
 - c. Pacifica's Planning Director previously stated that the city does not have to conduct a full CEQA compliance review and instead stated it was deferring analysis to the CCC; in essence admitting that no CEQA review has been conducted and will rely on the CCC to conduct the CEQA review. Yet, the CCC Staff states throughout this LCLUP that is relying on the City's analysis which the City already deferred back to the CCC!
 - d. Additionally, in the CCC Staff report analysis on page 36 states that the Pacifica SLR vulnerability assessment and draft adaptation plan from 2018 contains groundwater data, but the 2018 SLR adaptation plan does not actually include a groundwater analysis and Hydrology Figure 4-1 only

delineates “watersheds”; CCC Staff was deceived into believing this analysis was conducted. The best available data for groundwater analysis is from the USGS OCOF CoSMoS (see exhibit G) that shows a shallow water table for both the Quarry and the Pedro Point Field, but this should not be a surprise since they are wetlands! What the 2018 vulnerability study does show is significant erosion in LD-I-21 eliminating at least one-third of the site (exhibit J) which the CCC Staff fails to address as well.

- e. The CCC Staff attempts this flawed CEQA analysis in sites known as the Rockaway Quarry, Aramai Point and the Pedro Point Field & Wetland Site (LD-I-21). The CCC Staff is ignoring flooding, erosion and groundwater data on all three sites but especially the flooding data in the Pedro Point Field & Wetland Site (see exhibit A and C in 6/26/24 Casillas comment letter).
2. Coastal Act (CA) Section 30240(a) states “ESHA must be protected against any significant disruption of habitat values, and only uses dependent on such resources shall be allowed”. The CCC Staff is relying on LCLUP Figure 4-3 in the Environmental and Scenic Resources Chapter 4 which has omitted the presence of ESHA and the California Red Leg Frog (CRLF) in the Pedro Point Field & Wetland site (LD-I-21), yet under CCC Staff’s own analysis on page 18, CCC Staff admits the presence of ESHA and CRLF habitat and has data from a Coastal Commission biologist (exhibit H) showing adjacent ESHA with a protected species (CRLF). By not acknowledging this ESHA and protected species data is missing from the City’s analysis the CCC Staff report not only violates 30240(a) but also 30001.5 by not adequately taking steps to restore coastal resources, in this case, a known wetland and is relying on a flawed analysis from the City. The LCLUP is also required to standardize ESHA buffer zones in this area which is again omitted. Note that this omission is also present in the Quarry.
3. CA (Sections 30121, 30230, 30231 and 30233) and California Code of Regulations section 13577 require wetland sites to be identified, designated AND restored as wetlands based on the latest available data including ground water data. Figure 4-1 (Hydrology) does not include ground water data and although CCC Staff states that some groundwater hazard exists no analysis was conducted for many low-lying ocean adjacent sites including the Pedro Point Field & Wetland site (LD-I-21) and the Rockaway Quarry. Both the City and CCC Staff state that “best available science” was utilized for chapter 4 yet groundwater data, which is purposely omitted, is not included and the CCC Staff is taking the City at its word when no analysis was actually conducted. The actual best available data is USGS ground water data from the COSMoS data model which demonstrates a shallow water table for both the Quarry and Pedro Point Field & Wetland Site (LD-I-21) (see Exhibit G). The groundwater data along with CCC biologist previously stating that LD-I-21 is most likely wetlands (exhibit H) and was also included in the 2014 USF&WS wetlands Inventory would more than qualify under these restoration provisions.
4. The city is required under SB379 to utilize/restore identified appropriate sites to employ nature-based solutions(NBS) for climate resiliency, yet the city is again deferring the selection of SB379 sites without explanation; there is only a stated policy without identified sites. Because of the multiple environmental hazards and ESHA restraints, the Pedro Point Field & Wetland Site (LD-I-21) and Quarry sites should be studied as NBS opportunity sites in order to protect existing homes and infrastructure and potentially recorded as SB379 sites.
5. Special Shoreline Resiliency Areas (SSRAs) are an attempt to bypass the Coastal Act in an effort to intensify development in hazard zones which is counterintuitive and would further devastate our natural resources with the sole reliance on hard armoring. The CCC Staff’s acceptance of the City’s argument that the City will fulfil future obligations to offset the destruction of our beaches is

disingenuous since the city has no way to pay for any of the remediations and will only bring these plans forward in 10 years long after the seawalls are built. Additionally, the City states that part of its plan is to offset the known devastation of our beaches will be to build new facilities to increase public access (i.e., bathrooms and sidewalks), but if the beaches are gone, what are we accessing? This is a cynical attempt to manipulate the specified doctrine in Section 30235 where the CCC can override this provision and allows for armoring to protect coastal-dependent uses that are in danger of erosion in a different area, yet this SSRA plan is specifically causing erosion which is then offset by building more facilities and will not enhance other natural resources! We need NBS strategies that protect our existing homes and not sell us out for more development in hazard zones. Additionally, the City forbid the analysis of planning and costs associated with moving its infrastructure and is playing a game of “all or nothing” to force the CCC to acquiesce to its demands of SSRAs and hard armoring

Although I am in agreement with the CCC Staff regarding Policies ER-I-1 (Creek Protection and Restoration) and ER-I-4 (Wetlands Preservation), creek and ESHA buffer zones need to be maximized per the requirements of CEQA ESHA protections and for protected species habitat. A reduction below 50 feet is not adequate for the CRLF and in-fact CCCS biologist L. Garske-Garcia (CDP application 2-19-0026 F13a exhibit 11) cites a need for a 300-foot radius buffer for CRLF habitat in accordance with USFWS recommendations, yet the presence of ESHA and CRLF was purposely omitted by the city in Figure 4-3 while the CCC Staff’s own findings admit the presence of both.

Additionally, as noted in my comment letter from 6/26/24 the city is actually setting itself up for a taking by changing the LUD in the Pedro Point Field & Wetland Site(LD-I-21) to residential when it more closely matches “Low-Intensity Visitor-Serving Commercial” (LIVC) or “Conservation” (C) and considering the CEQA and Coastal Act violations noted above, along with the known constraints a LUD change to residential is negligent on the CCC Staff’s part.

We request additional changes from the CCC addressing:

At best, the Pedro Point Field & Wetland Site(LD-I-21) and Rockaway Quarry should only allow Low Intensity Visitor Commercial (LIVC), but considering the owners had prior knowledge of the hazard constraints before purchasing the properties, Conservation(C) would be appropriate and not a “taking”.

Additionally:

The City continues to use 5.7 feet of sea level rise(SLR) by 2100 while the 2024 State of California Sea Level Rise Guidance stipulate the use of 6.6 feet of sea level rise by 2100. In the interest of utilizing “best available science” this change needs to be incorporated.

Figure 4-1: Hydrology mapping is not utilizing the latest USGS ground water data from the COSMoS data model which shows the Pedro Point Field & Wetland Site and the Quarry with shallow water tables

Figure 2-2: Existing Land Use in the Coastal Zone: The Pedro Point Field & Wetland Site is currently zoned CR; “undeveloped vacant land” is not a valid zoning

Figure 3-2:Parks and Open Space System: The whole of Pedro Point Field & Wetland Site (LD-I-21) is a Park Opportunity Site due to present hazards, ESHA, previous wetland designation and the presence of protected species.

Figure 4-3: Environmentally Sensitive Habitat Areas: Ignores CCC biologist data in Pedro Point Field & Wetland Site for known CRLF habitat and ESHA that needs to be added based on best available science (CDP application 2-19-0026 F13a exhibit 11) which is confirmed by CCC Staff in LD-I-21 comments.

Figure 5-3: Flood Zones: Ignores flood data in Pedro Point Field & Wetland Site from USGS CoSMoS model which is best available science.

Finally, I was very concerned that CCC staff misrepresented the vast majority of the concerns from the PPCA and the multiple comment letters from residents of Pedro Point . Our main concern is and has been the presence of multiple hazards (and ESHA) that would make any development in the Pedro Point Field & Wetland (LD-I-21) a known future public nuisance. Furthermore, City Staff has refused to answer community concerns as to how the decision was made to change the zoning from Commercial Recreation (CR) to residential instead of its more appropriate designation of Conservation due to the present hazard and ESHA conditions. Our concerns are only magnified by the CCC Staff's refusal to acknowledge these concerns as well.

Please also see previous comment letters from the Pedro Point Community Association (PPCA) which include input from CEQA and environmental legal experts that find substantial violations with the Coastal Act and CEQA guidance which have not been addressed.

Regards,

Samuel Casillas
Board member, PPCA
Past Vice-Chair, Pacifica Economic Development Committee
Past Member, Pacifica Sea Level Rise Adaptation Planning Committee
Past Co-Chair GGNRA Board Liaison Committee
Past Member, Pacifica GPU Community Outreach Committee

Exhibit A: 1950s photograph of Pedro Point Field with sewage retention pond



Exhibit B: 1956 USGS map with Field labeled as Sewage disposal (Shell Mounds to Cul-de-Sacs: the Cultural Landscape of San Pedro Valley, Pacifica, California; John H. Culp, San Francisco State University, 2002; <https://static1.squarespace.com/static/5c259a66c258b4e0933f6ff9/t/5cec58e2eb39313d13bb96a5/1558993130124/Culp+History+of+San+Pedro+Valley.pdf>)

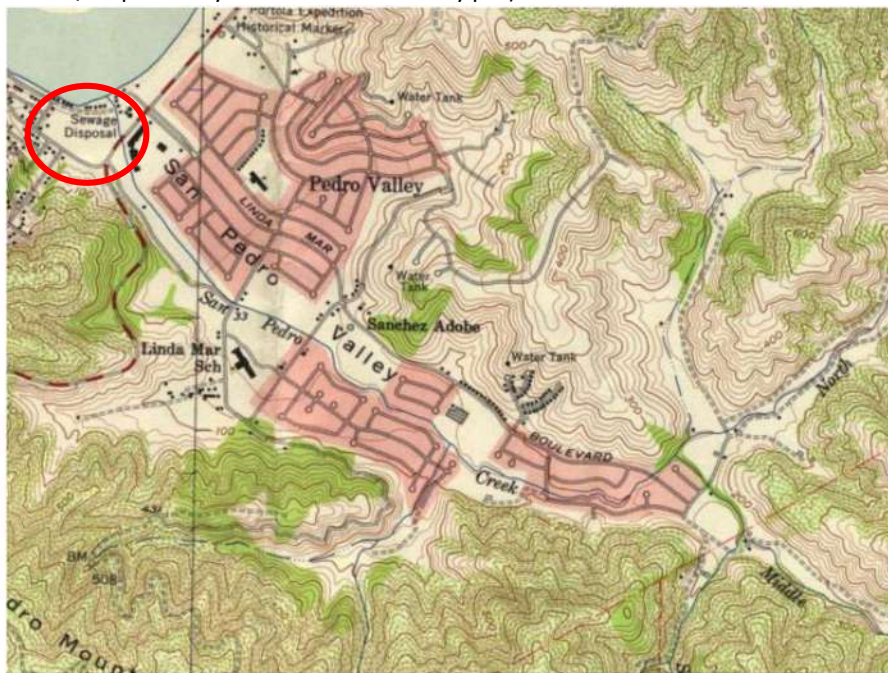


Figure 21. Portion of the 1956 USGS 7.5 minute *Montara Mountain* map showing San Pedro Valley (USGS 1956a).

The map shows the Pedro Valley area with various landmarks and streets. A red circle highlights the Linda Mar School area, which is located near the intersection of Linda Mar Blvd and Pedro Valley Blvd. Other labels on the map include Pedro Valley, Linda Mar Sch, Sanchez Adobe, Water Tank, and various streets like Linda Mar Blvd, Pedro Valley Blvd, and Middle. The map also shows topographic features like hills and a creek.

Exhibit D: 1980 USGS map with Field labeled as Sewage disposal

A topographic map of San Pedro, California, showing the coastline, San Pedro Mountains, and various valleys. A red circle highlights the area around the San Pedro Harbor and the San Pedro Mountains. The map includes labels for San Pedro, San Pedro Mountains, San Pedro Harbor, and various valleys like Pedro Valley and San Pedro Valley. The coastline is marked with points like Shelter Cove, Pedro Rock, and Point San Pedro. The map also shows the Pacific Ocean to the west and the San Pedro Mountains to the east. A red circle is drawn around the area near the San Pedro Harbor and the San Pedro Mountains.

Exhibit E: 315 San Pedro Ave Climate Risk disclosures(315 San Pedro Ave Redfin Realtor listing <https://www.redfin.com/CA/Pacifica/315-San-Pedro-Ave-94044/home/17491027>)

Climate risks

Most homes have some risk of natural disasters, and may be impacted by climate change due to rising temperatures and sea levels.



Flood Factor - Severe

99% chance of flooding in next 30 years



Exhibit F: 312 Kent adjacent property to 315 San Pedro Ave realtor disclosures (Zillow Realtor listing on adjacent 312 Kent property; https://www.zillow.com/homedetails/312-Kent-Rd-Pacifica-CA-94044/15504828_zpid/)

Climate risks

Source: First Street[®]

 Flood Factor

Severe

7/10

Insurance: critical

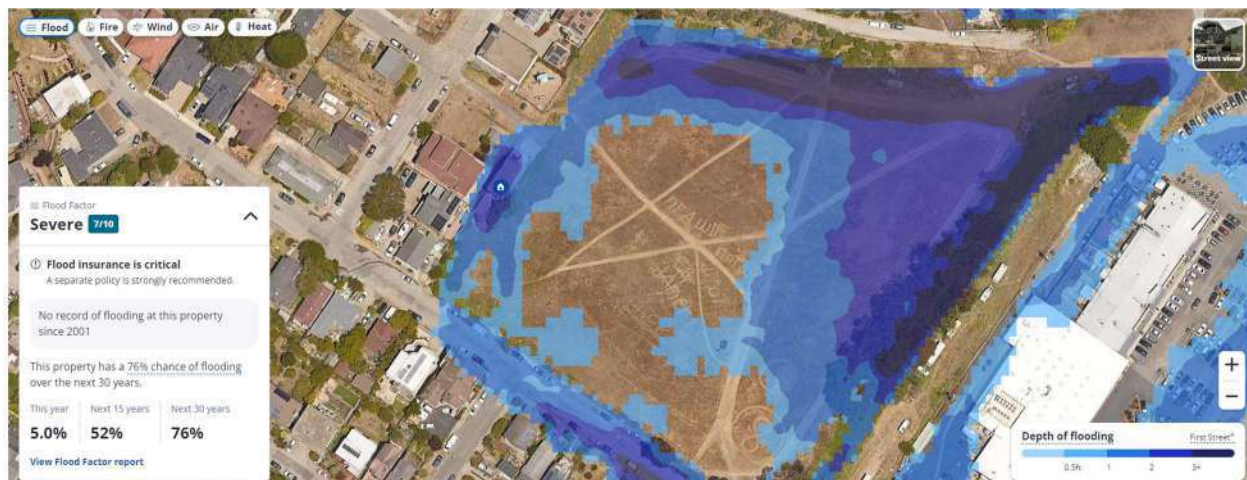
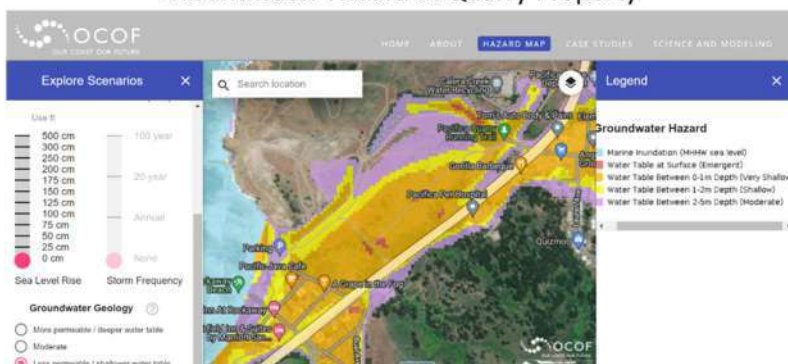


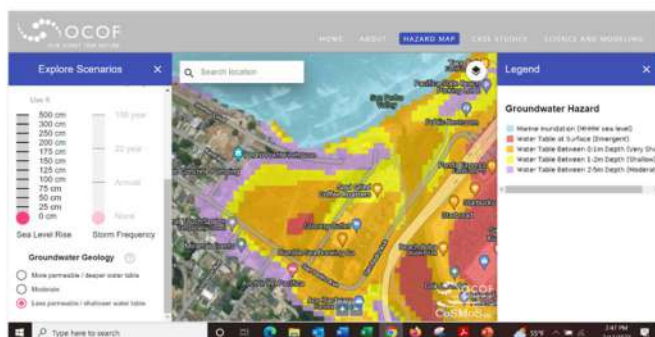
Exhibit G: Hydrology and Ground Water modeling by USGS OCOF CoSMoS

Groundwater Hazard at Quarry Property



Our Coast Our Future: USGS hydrology modeling on Coastal Storm Modeling System (CoSMoS): Quarry Hydrology

Groundwater hazard at Pedro Point Field and 505 San Pedro Ave



Our Coast Our Future: USGS hydrology modeling on Coastal Storm Modeling System (CoSMoS): Pedro Point Hydrology

Exhibit H: CCC Biologist Report findings at San Pedro Ave site with ESHA and protected species

CCC Biologist Findings from its denial of an adjacent property at 505 San Pedro Ave (CDP application 2-19-0026 hearing on 3/12/21)



Dr. Lauren Garske-Garcia, Senior Ecologist at the California Coastal Commission (F16a 2-19-0026; RHODES MIXED-USE DEVELOPMENT; MARCH 12, 2021; EXHIBITS

Exhibit J: Pacifica SLR Adaptation and Vulnerability Study 2018: exhibit 2 appendix B-5



SAN FRANCISCO PUBLIC GOLF ALLIANCE



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June 25, 2024

Pacifica City Council
Mayor Susan Vaterlaus
540 Crespi Dr.
Pacifica, CA. 94044

Re: City Council Special Meeting re Pacifica Local Coastal Plan, June 26, 2024, 6:00 p.m.

- 1. WE OBJECT TO RUSHED SPECIAL COUNCIL MEETING, FOR WHICH THE AGENDA -- WITH EXTENSIVE CHANGES--WAS HELD BACK, DENYING COUNCIL AND THE PUBLIC A FAIR CHANCE TO REVIEW, UNDERSTAND, AND COMMENT.**

Dear Mayor Vaterlaus and Councilmembers,

We object to Rushed Process, in violation of Coastal Act, Public Resources Code Section 30006,¹ which provides:

"The Legislature further finds and declares that the public has a right to fully participate in decisions affecting coastal planning, conservation, and development; that achievement of sound coastal conservation and development is dependent upon public understanding and support; and that the continuing planning and implementation of programs for coastal conservation and development should include the widest opportunity for public participation." (emphasis added)

¹ California Public Resources Code 30006

https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=PRC§ionNum=30006

The Coastal Commission's Mission Statement² echoes the importance of strong public participation in coastal planning processes.

The Commission is committed to protecting and enhancing California's coast and ocean for present and future generations. It does so through careful planning and regulation of environmentally-sustainable development, rigorous use of science, **strong public participation**, education, and effective intergovernmental coordination. (emphasis added)

The June 26 Agenda,³ appeared on the City's webpage June 21, — less than the customary one week's advance publication of agendas for the LCLUP public meetings⁴ – with a brand new June, 2024 iteration of the Draft Local Coastal Land Use Plan (Agenda, Attachment E) containing numerous wording changes, deletions, additions, and renumberings of text, policies, and definitions, accompanied by a confusing 51-page, fine-print, confusingly-colored "Summary Table with Alternative Modifications" (Agenda, Attachment B). The Agenda announces Staff's intention and recommendation that June 26 be the final, decisive meeting at which Staff recommends Council pass a Resolution approving all modifications and forwarding the document to the Coastal Commission for certification.

But the June 2024 LCLUP is a mess. Key policies and concepts – including the "Special Resiliency Area" concept which has been a focal point of discussion since December 2023 of at least six City Council public Study Meetings – have been changed since City Council's May 23 LCLUP Special Meeting. with the modification text – which appears to be substantially the work of Coastal Commission Staff rather than Pacifica Staff -- appearing in the "alternative modifications" column that has heretofore been reserved for modifications originating from Pacifica Staff in all prior iterations of the Draft LCLUP agenda packets. This is only one of many disorienting features of the June 26 Agenda Packet. Apparently Coastal Commission Staff and its Legal Department took a month to rework key provisions of the Resiliency Policies, including "Special Resiliency Areas" (renamed Shoreline Special Resiliency Areas" in the June 2024 Draft, and then all of this was publicly noticed barely 5 days before public hearing.

The short notice handicaps public awareness and input (including by this correspondent) in the coastal planning decisionmaking process on this very controversial and very complex matter (made all the more complex – and confusing – by the sudden major changes appearing for the first time in the June 2024 iteration of the Draft Local Coast Plan), all in violation of Public Resources Code Section 30006 and the Coastal Commission's Mission Statement.

This should be reason enough for Council to call the June 26 meeting off and reschedule it for a later date when the meeting can be properly noticed. In any event and in these conditions, we ask Council: (1) to delay substantive discussion and decisionmaking; and (2) if the meeting is held as scheduled on June 26, to provide for an extended period for written public comment, with a

² California Coastal Commission Website, Mission Statement: <https://www.coastal.ca.gov/whoweare.html>

³ Pacifica City Council, Agenda for June 26, 2024:
<https://pacificacityca.igm2.com/Citizens/FileOpen.aspx?Type=1&ID=1540&Inline=True>

⁴ Pacifica City Council Meeting May 23, 2024 Minutes, at p. 48
<https://pacificacityca.igm2.com/Citizens/FileOpen.aspx?Type=15&ID=1457&Inline=True>

regularly-scheduled Council meeting at which such public comment would be reviewed and considered by Council before any decision is made one way or the other.

OTHER ISSUES

2. Neither the June 26 Agenda, the Staff Report, nor its attached revised June 2024 Draft LCLUP Respond to Key Issues and questions – including the following -- Raised by Council and/or promised by Planning Staff at Council’s May 23, 2024 Special LCLUP Study Meeting.

- (1) **Ingrid B. Lacy School Bond.** Mayor Vaterlaus asked if the Draft LCLUP’s terms would put the Ingrid B. Lacy Middle School⁵ “at risk of not being . . . allowed to improve their property” with school bond funds already approved by Pacifica voters. Planning Director Murdock responded: “City staff would need to do further research on that question to provide an informed answer.”⁶

Lack of Tsunami and Updated Sea Level Rise and Trails maps. Councilmembers Beckmeyer and Boles discussed with Planning Director Murdock the need for new Tsunami and Flood Hazard maps to give Councilmembers and Pacifica residents “a better understanding of the impact” of the Draft LCLUP’s development and deed restrictions, because they are “not defined enough for people’s comfort level”.⁷ The June 23 Staff Report states, at page 2, that one of the benefits of an updated Local Coastal Land Use Plan will be “accurate maps”. Planning Staff promised in its May 23, 2023 Staff Report that an updated Coastal Access Trails Map was “ongoing” and would be “incorporated into an updated exhibit with the final alternative modifications”. (May 23, 2023 Staff Report, at p. 7, Packet Pg. 10.) But there are no new flood hazard or projected sea level rise or Tsunami maps or a new Trails map in the June 26 Staff Report or the accompanying June 2024 Draft LCLUP. Because the Text of the Draft LCLUP refers to and incorporates the Maps, the lack of updated maps renders the text and the Draft LCLUP itself out-of-date, false, and misleading.

Burdensome Technical Reports Requirement. At several points in the May 23 Council meeting, Councilwoman Boles objected to the prohibitive cost of the Technical Reports requirement for individual homeowner and other small development projects, including relatively minor “structural modifications”. “She questioned what the cost was for a homeowner and if it is even possible. . . what would it cost a homeowner to hire the specialty engineer . . . what does it mean to all the other property owners and businesses that have to do this on their own: what does it really cost, what’s the process . . .”⁸

⁵ The Ingrid B. Lacy Middle School is located at 1427 Palmetto Ave., west of the Coast Highway, within the Coastal Zone and north of the proposed Sharp Park Special Resiliency Area. On or about March 5, 2024 Pacifica voters approved a Pacifica School District School Bond Election, the \$70 Million Measure G (<https://smcacre.gov/elections/march-5-2024-election-results>) to fund, inter alia, classroom, safety, and infrastructure improvements at the Ingrid B. Lacy Middle School (<https://smcacre.gov/media/6485/download?attachment>)

⁶ Pacifica City Council Meeting May 23, 2024 Minutes, at p. 5
<https://pacificacityca.igm2.com/Citizens/FileOpen.aspx?Type=15&ID=1457&Inline=True>

⁷ Pacifica City Council Meeting May 23, 2024 Minutes, *Ibid.*, at p. 47

⁸ Pacifica City Council Meeting May 23, 2024 Minutes, *Ibid.*, at pp. 27-28, 29

Councilwoman Boles' questions go unanswered, and the Technical Reports and other requirements have only gotten more burdensome in the new June 2024 Draft LCLUP.

3. Low-Income Housing. The June 2024 Draft LCLUP does not meet the Requirements of (1) The Legislature, (2) the Coastal Act, or (3) the Coastal Commission's Environmental Justice Policy to Protect Existing Low-Income Housing.

The Coastal Act, at Public Resources Code Section 30604(f) and (g) requires the Coastal Commission to ““(f) . . . encourage housing opportunities for persons of low and moderate income,” and (g) “The Legislature finds and declares that it is important for the commission to **encourage the protection of existing** and the provision of new **affordable housing opportunities for persons of low and moderate income in the coastal zone.**”⁹

The big **apartment complex at 2590 Francisco Blvd.**, near the northeastern corner of the golf course and south of Clarendon Road, is identified as “**affordable rental**” by a star on the Sharp Park, West Fairway Park and Mori Point Coastal Vulnerability Zone Map.¹⁰ Pacifica's Sea-Level Rise Vulnerability Assessment (ESA, June 2018) reports the 2590 Francisco apartment complex **constitutes 20% of Pacifica's total affordable rental property.**¹¹ (See **Exhibit 1**, a copy of Table 7, at the fifth line from the top.) The 2590 Francisco Blvd. is comprised of 3 separate parcels -- Assessor's Parcel Nos. 160-400-080, -090, and -100, that were purchased in 2003 by Lakeside Apartment Housing from Peninsula Habitat for Humanity, and in May 2023 were refinanced by loans from the San Mateo County Department of Housing.¹² As of June 25, 2024 these apartments are listed on HUD Housing Network.com, a low-income housing search site, as “Lakeside Apartments,” as follows: “. . . the Lakeside Apartments has 10 Low Income approved units available. Lakeside Apartments is a Affordable housing development in Pacifica, California. Rents range from \$687 - \$1.341 for low income individuals who meet the income threshold as well as other eligibility requirements.”¹³

There is no provision in the June 2024 Draft LCLUP to “encourage” or “protect” in any way the low income rental housing at the 2590 Francisco apartment building -- 20% of the

⁹ California Public Resources Code Section 30604(f) and (g):

https://leginfo.ca.gov/faces/codes_displaySection.xhtml?sectionNum=30604.&lawCode=PRC

¹⁰ Appendix B-3, Coastal Vulnerability Zone Map, Sharp Park, West Fairway Park, and Mori Point, at Redlined LCLUP, April 2024, Found at Agenda of Pacifica City Council's May 23, 2024 LCLUP Special Meeting #4.3, at Pkt. Pp. 280/351 <https://pacificacityca.igm2.com/Citizens/FileOpen.aspx?Type=14&ID=1535&Inline=True>

¹¹ Sea Level Rise Vulnerability Assessment for Pacifica LCP Update, ESA. June 2018 (Attachment F to City Council Agenda Summary Report, re: Draft Local Coastal Program Policies Relating to Sea Level Rise Adaptation, Dec.10, 2018 (starting at Packet pg.113) <https://pacificacityca.igm2.com/Citizens/FileOpen.aspx?Type=1&ID=1225&Inline=True> , (Pkt Pg. 735/1050), at Table 7, fifth line from top of page, Sharp Park, West Fairway Park and Mori Point Asset Exposure

¹² **APN .080** (https://drive.google.com/file/d/1BuWX3ln8u_mWT_hlExCr_rkCxDvoazxi/view?usp=drive_link); **APN .090** (https://drive.google.com/file/d/1A1boPx6TGCPn-n346pxhrFlcubHFpltF/view?usp=drive_link); **APN.100** (https://drive.google.com/file/d/1Lp64ldCJ9PdbxFlDqG9EwiYt8wHH4MPU/view?usp=drive_link)

¹³ HUD Housing Network.com: <https://hudhousingnetwork.com/ca/san-mateo/pacifica/low-income-housing-details/3618/lakeside-apartments>

amount of low income rental housing in the entire City of Pacifica, according Pacifica's own Sea Level Rise Vulnerability Assessment. Instead, the combination of the restrictions on "development" (including the "Significant Structural Modifications") and the "Technical Reports" requirements make even most ordinary repairs and alterations virtually impossible. This is not "encouragement" or "protection". It is exactly the opposite.

3. Burdensome, Restrictive and Misleadingly Captioned Coastal Resiliency Implementing Policies, inserted in the Draft March 2024 LCLUP by Coastal Commission Staff.

Appearing in a subsection of the Draft Plan captioned "NEW SHORELINE DEVELOPMENT STANDARD POLICIES" are several "Implementing Policies," including:¹⁴

"CR-I-19 Technical Reports," (Chapt. 6, Pg. 6-32) requiring development proposals in Coastal Vulnerability Zones to include "engineering, geomorphology and other relevant technical reports, prepared by licensed engineers and other professionals

"CR-I-20 Siting and Design," (Chapt. 6, Pg. 6-33) requiring "new development" in Coastal Vulnerability Zones to be "sited and designed to be safe from . . . flooding and other coastal hazards for at least 100 years without shoreline protection considering projected sea level rise and other climate change effects to be determined from best available science . . ."

"CR-I-21 Coastal Hazards Risk Disclosure" – requiring permit applicants for development in Coastal Vulnerability and Tsunami Evacuation Zones to record deed restrictions, waiving rights, etc.; and

"CR-I-25 Substantial Structural Modifications (Chapt. 6, Pg. 6-36) – requiring property owners to, among other things, "correct any existing legal nonconformities, consistent with the Technical Reports and Siting and Design requirements of CR-I-19 and CR-I-20, above.

These "Implementing Policies" were modified by Coastal Commission Staff "suggestions" in March 2024 to extend the policies beyond "new shoreline" development to all development, including remodels and renovations of existing structures.¹⁵ And they have been significantly re-modified, renumbered, reshuffled, and a couple of them recaptioned, in the current June Draft LCLUP. (Making the analysis and understanding extraordinarily cumbersome and difficult.) These policies remain captioned "New Shoreline Development -- which causes confusion, including public confusion by City Council members as to whether they only apply to "new" development-- as reflected in the Minutes of Council's public meetings.

Also at CCC Staff's direction, subtle modifications were made in March 2024 to the LCLUP Glossary, including -- (i) adding to the definition of "Development" the final short phrase "development is synonymous with new development," (Glossary, Page G-4); (ii) striking the City Council-approved Consultation Draft LCLUP's original definition of "New Development" (which specifically excluded "remodeling or improvement of an existing structure") (Glossary Page G-8); and (iii) adding a brand new term to the Glossary, "Coastal Hazards," which includes, among

¹⁴ Redline LCLUP, June 2024, Agenda Packet, Pacifica City Council June 26, 2024 LCLUP Meeting #4.5, at Pages 6-32 to 6-34, Pkt.Pgs.276-278 <https://pacificacityca.igm2.com/Citizens/FileOpen.aspx?Type=1&ID=1540&Inline=True>

others, “flooding” and “tsunami” (Glossary, Pg. G-4). Tsunami is further defined in the California Department of the Environment Flood Hazard maps¹⁶, and identified by the California Geological Survey as the “975 year return period probabilistic tsunami inundation model” event.¹⁷ By the device of adding the “Coastal Hazards” definition to the Glossary, the CCC invoked the Figure 5-3 Flood Zones map¹⁸— with its broad “Tsunami Evacuation Zone” swath that encompasses – and burdens even the smallest “development” (repairs) in virtually the entire Pacifica Coastal Zone.

Bottom-line result is that these policies in their current June 2024 Draft state, would require Coastal Vulnerability Zone homeowners and other property owners seeking coastal development permits for improvements including relatively small alterations to “an existing structure” to engage “engineering, geomorphology and other relevant technical reports” from licensed engineers and other professionals to certify that the improved structure will be safe from . . . flooding and other coastal hazards [including the 1-in-975-year Tsunami] for at least 100 years without shoreline protection, to correct all non-conforming uses, and to waive rights. At City Council’s May 23, 2024 Special Meeting on the LCLUP, Councilmembers voiced concern that the expense of complying with the permit precondition of the expert technical reports and the risk disclosure seemed disproportionate and would discourage small property owners and businesses from upgrading or even repairing their properties. Then-Planning Director Murdock the “there may be relatively minor projects that need a CDP that would be subject to this requirement”¹⁹ The burden and obvious great expense of these requirements appears designed to discourage property owners from improving – or even repairing -- their homes and properties.

At that same May 23 City Council meeting, Pacifica’s City Manager and Planning Director encouraged Council to adopt the Draft LCLUP notwithstanding burdensomeness to some homeowners and other small property holders, because the City itself would benefit, by virtue of a “Special Resiliency Area” exemption in the West Sharp Park neighborhood north of the golf course, from significantly improved marketability and value of the City’s own large vacant lot at 2212 Beach Boulevard, and the potential reduced expense of relocating City infrastructure, in addition to an increased tax base from development of other properties in the West Sharp Park and Rockaway Beach neighborhoods.²⁰

¹⁶ California Department of Conservation, CGS Information Warehouse: Tsunami Hazard Area Map: https://maps.conservation.ca.gov/cgs/informationwarehouse/ts_evacuation/

¹⁷ California Geological Survey Tsunami Hazard Area Map County of San Mateo, Mar. 23, 2021 https://www.conservation.ca.gov/cgs/Documents/Publications/Tsunami-Maps/Tsunami_Hazard_Area_Map_San_Mateo_County_a11y.pdf

¹⁸ Redlined LCLUP, June 2024, Agenda Packet, Pacifica City Council June 26, 2024 LCLUP Meeting #4.5, at Page 8-16, Packet Page 346 <https://pacificacityca.igm2.com/Citizens/FileOpen.aspx?Type=1&ID=1540&Inline=True>

¹⁹ Pacifica City Council Special Meeting, May 23, 2024, Minutes, at, e.g. Pages 6, 40-41 (Beckmeyer); Page 34 (Murdock); Pages 27, 29 (Boles: “... what would it cost a homeowner to hire the specialty engineer . . . what does it mean to all the other property owners and businesses that have to do this on their own: what does it really cost, what’s the process...”) <https://pacificacityca.igm2.com/Citizens/FileOpen.aspx?Type=15&ID=1457&Inline=True>

²⁰ Pacifica City Council Special Meeting, May 23, 2024, Minutes, *Id.*, at pp. 27-30 <https://pacificacityca.igm2.com/Citizens/FileOpen.aspx?Type=15&ID=1457&Inline=True>

4. **Property Rights, The Federal and State Constitutions, the Coastal Act, the Supreme Court's Recent Sheetz Decision, Fairness, and The "Takings" Issue.**

The Fifth Amendment to the U.S. Constitution provides, in relevant part:

"No person shall . . . be deprived of life, liberty, or property, without due process of law; nor shall private property be taken for public use, without just compensation."²¹

The California Constitution, at Article 1 Section 1 provides:

"All people are by nature free and independent and have inalienable rights. Among these are . . . acquiring, possessing, and protecting property . . ."²²

The Coastal Act, at California Resources Code Section 2035 provides:

"Revetments, breakwaters, groins, harbor channels, seawalls, cliff retaining walls, and other such construction that alters natural shoreline processes shall be permitted when required to serve coastal-dependent uses or to protect existing structures or public beaches in danger from erosion and when designed to eliminate or mitigate adverse impacts on local shoreline sand supply."²³

Homeowners in the 1950's-era West Fairway Park subdivision and other Pacifica property owners have property rights that include, by virtue of California Resources Code Section 30235, the right to protect their property, including protection from the ocean offered by shoreline protection structures such as the Sharp Park Berm and the Beach Boulevard Seawalls.

The United States Supreme Court's April 2024 decision in Sheetz vs. County of El Dorado, California ²⁴ held that a legislative body – such as a city council – can be held liable for "takings" of private property, for imposing fees, exactions or other conditions on the issuance of a permit where, among other things, the exaction or condition lacks a direct nexus and "rough proportionality" to the government's land-use interest.

"Our decisions in *Nollan* and *Dolan* address this potential abuse of the permitting process. There, we set out a two-part test modeled on the unconstitutional conditions doctrine. See *Perry v. Sindermann*, 408 U. S. 593, 597 (1972) (government "may not deny a benefit to a person on a basis that infringes his constitutionally protected interests"). First, permit conditions must have an "essential nexus" to the government's land-use interest. *Nollan*, 483 U. S., at 837. The nexus requirement ensures that the government is acting to further its stated purpose, not leveraging its permitting monopoly to exact private property without paying for it. See *id.*, at 841.

²¹ Fifth Amendment to US Constitution: <https://constitution.congress.gov/constitution/amendment-5/>

²² California Constitution Article 1 Section 1:
https://leginfo.legislature.ca.gov/faces/codes_displayText.xhtml?lawCode=CONS&division=&title=&part=&chapter=&article=1

²³ Coastal Act, California Public Resources Code Section 30235:
https://leginfo.legislature.ca.gov/faces/codes_displayText.xhtml?lawCode=PRC&division=20.&title=&part=&chapter=3.&article=4.

²⁴ Sheetz vs. County of El Dorado, California, U.S. Supreme Court October Term, 2023, No. 22-1074
https://www.supremecourt.gov/opinions/23pdf/22-1074_bqmd.pdf

Second, permit conditions must have “rough proportionality” to the development’s impact on the land-use interest. *Dolan*, 512 U. S., at 391. A permit condition that requires a landowner to give up more than is necessary to mitigate harms resulting from new development has the same potential for abuse as a condition that is unrelated to that purpose.²⁵

The disproportionate, out-of-scale impacts on property owners of the June Draft LCLUP’s “Technical Reports,” “Siting and Design,” and “Coastal Hazards Risk Disclosure” provisions, among many others – including requirements for obviously very expensive technical reports as precondition for permit applications for even minor improvements to individual homes and properties under the “Substantial Structural Modification” rubric, raises the problem – discussed by Councilmembers at the May 23 City Council meeting, that these may be takings in violation of the California and United States Constitutions.

5. The Council – and the City – have Alternatives

The Staff Report opens at Page 1 with a recommendation to Council to approve the draft Resolution certifying the June 2024 Draft LCLUP “with Alternative Modifications,” and closes at Page 9 with the statement that “No alternative action has been identified” (by Staff).

The obvious alternative action is to acknowledge that the June Draft LCLUP, presented in a hurry-up fashion, with massive, confusingly organized and presented new “alternative modifications” provided by Coastal Commission Staff, is not now fit for adoption. Too many mistakes, too many unanswered questions, out-of-date and inaccurate maps that are incorporated into the document’s text, significant legal problems, and great new burdens unfairly and inequitably thrust upon Pacifica residents and property owners.

Best counsel at this point is to put it on Pause. And stick with Pacifica’s existing Local Coastal Plan until such time as some of the legal kinks have straightened-out (such as the definition of “existing structure,” currently pending in California’s appellate courts), and the City of Pacifica has had some time to consult with other governmental entities (such as Pacifica’s Schools, the City of San Francisco with respect to its golf course, and the NCCWD).

The pell-mell nature of the scheduled June 25 meeting and the accompanying June Draft LCLUP should be avoided.

Respectfully submitted,

Richard Harris

President, San Francisco Public Golf Alliance

cc: City Manager Kevin Woodhouse, Deputy Planning Director Stefanie Cervantes, Planning Commission and Commissioners, City Clerk Sarah Coffey, Phil Ginsburg, Gen. Mgr., San Francisco Recreation and Parks Dept., Spencer Potter, Esq., San Francisco Recreation and Parks Dept.

²⁵ *Sheetz vs. County of El Dorado, California, Id.*, at p. 9.

EXHIBIT 1

Table 7
Sharp Park, West Fairway Park and Mori Point Asset Exposure for Existing and Future Sea-levels

Sub-area Asset Exposure Table Sharp Park, West Fairway Park, and Mori Point			Existing Conditions (% of Sub-area)		2050 Exposure Count (Percent of Sub-area total) Exposure Range for Inundation and Flooding is for Climate Model: A19.25.50				2100 Exposure Count (Percent of Sub-area total) Exposure Range for Inundation and Flooding is for Climate Model: A19.25.50			
Category	Asset	Units	Total in Sub-area (Flat Pasture)	Storm Flooding	Coastal Erosion	Regular Total Inundation	Storm Flooding	Coastal Erosion	Regular Total Inundation	Storm Flooding	Coastal Erosion	Regular Total Inundation
Coastal Structures	Arctic Structures	bed	5,741,243	1,831.68	5,755,558	-	5,458,020,548.02	5,755,558	-	5,458,020,548.02	5,755,558	-
			(18.4%)	32.2%	38.3%		(95.0% - 95.0%)	38.3%		(95.0% - 95.0%)	38.3%	
Coastal Structures	Levees	bed	27,491,267	1,737,337	27,491,267	-	10,747,103,933.93	27,491,267	-	10,747,103,933.93	27,491,267	-
			(85.0%)	34.2%	(7.9%)		(38.0% - 40.1%)	(0.0%)		(38.0% - 40.1%)	34.2%	
Communications	Coastal underground conduit	bed	1,735,387	1,688,658	1,682,383	-	8,608,103,833.65	1,682,383	-	8,608,103,833.65	1,682,383	-
			(5.3%)	24.2%	(11.0%)		(33.1% - 23.0%)	(30.2%)		(33.1% - 23.0%)	24.2%	
Communications	Towers, Poles	column	5	-	-	-	-	-	-	-	-	-
			(15.2%)	-	-	-	-	-	-	-	-	-
Community	Mobile Phone Towers	column	1	-	-	-	-	-	-	-	-	-
			(3.2%)	-	-	-	-	-	-	-	-	-
Community	Extraneous, At Risk	acres	0	-	-	-	-	-	-	-	-	-
			(0.0%)	-	-	-	-	-	-	-	-	-
Community	Healthcare Facility	column	0	-	-	-	-	-	-	-	-	-
			(0.0%)	-	-	-	-	-	-	-	-	-
Community	Landmarks	column	4	-	-	-	-	-	-	-	-	-
			(14.4%)	-	-	-	-	-	-	-	-	-
Community	Public House Parks	column	0	-	-	-	-	-	-	-	-	-
			(0.0%)	-	-	-	-	-	-	-	-	-
Community	Schools	acres	0.093	-	-	-	-	-	-	-	-	-
			(0.3%)	-	-	-	-	-	-	-	-	-
Community	Senior Centers	column	0	-	-	-	-	-	-	-	-	-
			(0.0%)	-	-	-	-	-	-	-	-	-
Emergency	Beaches	acres	25,531	25,531	25,531	2,763.38	25,230,21	25,531	4,887.41	25,170,31	25,531	4,887.41
			(78.2%)	38.1%	(38.3%)	(15.0% - 16.0%)	(96.0% - 91.0%)	38.1%	(13.0% - 17.1%)	(96.0% - 91.0%)	38.1%	4,887.41
Emergency	GA Red Flag Fire Hazard	acres	0	-	-	-	-	-	-	-	-	-
			(0.0%)	-	-	-	-	-	-	-	-	-
Emergency	Emergency Services	bed	0	-	-	-	-	-	-	-	-	-
			(0.0%)	-	-	-	-	-	-	-	-	-
Emergency	Stations	bed	1,700,387	-	-	-	-	-	-	-	-	-
			(5.3%)	-	-	-	-	-	-	-	-	-
Emergency	Stations	bed	329,321	329,321	329,321	329,321	329,321	329,321	329,321	329,321	329,321	329,321
			(1.0%)	32.2%	(0.1%)	(10.0% - 10.0%)	(10.0% - 10.0%)	32.2%	(10.0% - 10.0%)	(10.0% - 10.0%)	32.2%	329,321
Emergency	Waterways	acres	31,170	31,170	31,170	31,170	31,170	31,170	31,170	31,170	31,170	31,170
			(14.0%)	38.0%	(8.2%)	(14.0% - 10.0%)	(96.1% - 96.2%)	38.0%	(10.0% - 10.0%)	(96.1% - 96.2%)	38.0%	31,170
Emergency	Fire	acres	0	-	-	-	-	-	-	-	-	-
			(0.0%)	-	-	-	-	-	-	-	-	-
Emergency	Fire	acres	0	-	-	-	-	-	-	-	-	-
			(0.0%)	-	-	-	-	-	-	-	-	-
Emergency	Police	acres	0	-	-	-	-	-	-	-	-	-
			(0.0%)	-	-	-	-	-	-	-	-	-
Emergency	Police	acres	0	-	-	-	-	-	-	-	-	-
			(0.0%)	-	-	-	-	-	-	-	-	-
Emergency	Police	acres	0	-	-	-	-	-	-	-	-	-
			(0.0%)	-	-	-	-	-	-	-	-	-
Emergency	Police	acres	0	-	-	-	-	-	-	-	-	-
			(0.0%)	-	-	-	-	-	-	-	-	-
Emergency	Police	acres	0	-	-	-	-	-	-	-	-	-
			(0.0%)	-	-	-	-	-	-	-	-	-
Emergency	Police	acres	0	-	-	-	-	-	-	-	-	-
			(0.0%)	-	-	-	-	-	-	-	-	-
Emergency	Police	acres	0	-	-	-	-	-	-	-	-	-
			(0.0%)	-	-	-	-	-	-	-	-	-
Emergency	Police	acres	0	-	-	-	-	-	-	-	-	-
			(0.0%)	-	-	-	-	-	-	-	-	-
Emergency	Police	acres	0	-	-	-	-	-	-	-	-	-
			(0.0%)	-	-	-	-	-	-	-	-	-
Emergency	Police	acres	0	-	-	-	-	-	-	-	-	-
			(0.0%)	-	-	-	-	-	-	-	-	-
Emergency	Police	acres	0	-	-	-	-	-	-	-	-	-
			(0.0%)	-	-	-	-	-	-	-	-	-
Emergency	Police	acres	0	-	-	-	-	-	-	-	-	-
			(0.0%)	-	-	-	-	-	-	-	-	-
Emergency	Police	acres	0	-	-	-	-	-	-	-	-	-
			(0.0%)	-	-	-	-	-	-	-	-	-
Emergency	Police	acres	0	-	-	-	-	-	-	-	-	-
			(0.0%)	-	-	-	-	-	-	-	-	-
Emergency	Police	acres	0	-	-	-	-	-	-	-	-	-
			(0.0%)	-	-	-	-	-	-	-	-	-
Emergency	Police	acres	0	-	-	-	-	-	-	-	-	-
			(0.0%)	-	-	-	-	-	-	-	-	-
Emergency	Police	acres	0	-	-	-	-	-	-	-	-	-
			(0.0%)	-	-	-	-	-	-	-	-	-
Emergency	Police	acres	0	-	-	-	-	-	-	-	-	-
			(0.0%)	-	-	-	-	-	-	-	-	-
Emergency	Police	acres	0	-	-	-	-	-	-	-	-	-
			(0.0%)	-	-	-	-	-	-	-	-	-
Emergency	Police	acres	0	-	-	-	-	-	-	-	-	-
			(0.0%)	-	-	-	-	-	-	-	-	-
Emergency	Police	acres	0	-	-	-	-	-	-	-	-	-
			(0.0%)	-	-	-	-	-	-	-	-	-
Emergency	Police	acres	0	-	-	-	-	-	-	-	-	-
			(0.0%)	-	-	-	-	-	-	-	-	-
Emergency	Police	acres	0	-	-	-	-	-	-	-	-	-
			(0.0%)	-	-	-	-	-	-	-	-	-
Emergency	Police	acres	0	-	-	-	-	-	-	-	-	-
			(0.0%)	-	-	-	-	-	-	-	-	-
Emergency	Police	acres	0	-	-	-	-	-	-	-	-	-
			(0.0%)	-	-	-	-	-	-	-	-	-
Emergency	Police	acres	0	-	-	-	-	-	-	-	-	-
			(0.0%)	-	-	-	-	-	-	-	-	-
Emergency	Police	acres	0	-	-	-	-	-	-	-	-	-
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826 Stanyan St., San Francisco, CA 94117 • 415-290-5718 • info@sfpublicgolf.org



May 22, 2024

Pacifica City Council
Mayor Susan Vaterlaus
540 Crespi Dr.
Pacifica, CA. 94044

Pacifica City Council Mtg / May 23, 2024 / Draft LCLUP Study Session #4.3

Comments of San Francisco Public Golf Alliance re Modifications:

In Short, the June 2024 Draft LCLUP is far from ready, needs much more work.

Dear Mayor Vaterlaus and Council Members,

For your consideration, herewith our comments and suggestions regarding the policies and provisions of the April 2024 Revised Certification Draft LCLUP (hereafter, the Draft LCLUP) that are scheduled for your Council's public review at the May 23 Study Session.¹ Our comments follow the format and modifications numbering of Attachment B to Council's May 23 Agenda, "Summary Table with Alternative Modifications. Our proposed revisions to the suggested modifications (whether suggested by Pacifica or CCC) appear as follows, highlighted: additions in ***bold italics***, deletions in ~~**bold**~~ ~~**strikeout**~~.

¹ The April 2024 Revised Certification Draft LCLUP is found at Attachment G of the Agenda of Council's May 23, 2024 Special Meeting, at p. 56ff: <https://pacificacityca.iqm2.com/Citizens/FileOpen.aspx?Type=14&ID=1535&Inline=True>

Chpt. 6

Mod. 6.2 C'stl Act Pol. [at LCLUP text, p. 6-2, pkt.pg.229] CCC Suggested Mod'n

Therefore, the policies focus on protecting **significant and sensitive coastal resources, including but not limited to environmentally sensitive habitat areas, public access to no-cost and low-cost public recreation**, beaches and the natural shoreline while also allowing for protection and armoring of the shoreline for specific **limited** circumstances as provided for within the Coastal Act and reassessment of the adaptation plan in the future.

Mod.6.14 Sub-Area Policies, Programs [at LCLUP text, p. 6-17, pkt.pg.244] Spl.Resil.Areas [Pacifica Staff Draft] Alt. Mod'n. The Special Resiliency Areas (SRA) include the existing shoreline protection structures in the Rockaway Beach and **West Sharp Park, West Fairway Park and Mori Point Vulnerability Zone** sub-areas. **(Appendix B-3 Coastal Vulnerability Zone Map Sharp Park, West Fairway Park, and Mori Point.)** These existing shoreline protection structures protect a mix of unified coastal access, including coastal access points and trails; public infrastructure, including sidewalks, roads, water, and **sanitary and storm** sewer; electrical utilities; and public parking, both on- and off-street, **development patterns with significant amounts of Pre-Coastal Act development, Pacifica historical landmarks, and land use prioritized by the Coastal Act.** The unique circumstance in Rockaway Beach and **West Sharp Park-West Fairway Park-Mori Point** warrant a unique policy approach. The purpose of modifying policies applicable to this area is to allow ongoing reliance on the existing shoreline protection structures and allow ongoing **economic use and vitality of property**, provision of public services, operation of visitor-serving uses, and protection of robust coastal access for all persons including persons with disabilities within a Special Resiliency Area (SRA). The two SRA locations are identified in Figure 6-2 and 6-3.

SF PUBLIC GOLF ALLIANCE NOTE: We have previously submitted letters to Council dated February 25, March 27, and April 14, 2024 supporting inclusion of the entire Sharp Park, West Fairway Park and Mori Point Vulnerability Zone sub-areas in the Special Resiliency Area. And we expect to submit another—hopefully prior to Council's May 23 LCLUP Study Session #4.3.

6.23 CR-I-23: [at LCLUP text, p. 6-23, pkt.pg.250] [Pacifica Staff Draft] Alt. Mod'n. Sharp Park Golf Course **and berm.** Sharp Park Golf Course **and berm.** Strongly support City and County of San Francisco's ability **at the Sharp Park Golf Course and berm** to provide public **coastal** access **along the coast, including no-cost and low-cost public recreational access including disability access**, protect Environmentally Sensitive Habitat Areas **and endangered and threatened species in the Sharp Park wetlands, scenic views of Mori Point, the coastal hills and the beach and ocean, emergency and maintenance vehicle access to GGNRA lands, trails and scenic outlooks at Mori Point, Coastal Trail connection to the Beach Boulevard Promenade and Pacifica Pier**, and provide flood protection **for Pacifica landmarks and the residential neighborhoods north and south of the golf course.**

Glossary

Mod. 7.5 Development [at LCLUP text, p. G-4, pkt.pg.291] CCC Suggested Mod'n **Public Golf Alliance respectfully objects to the definitions of "Development" (from both Pacific and CCC) as applied to ordinary and customary maintenance and operation practices at Sharp Park or for that matter any golf course, which are public park landscapes and need to be**

maintained. The current (1980) Pacifica Local Coastal Plan has no such detailed definition of “development” that we can find, so the City of Pacifica and its Planning Department has been uninvolved in the details of golf greenskeeping and agronomic practices. Details of the proffered definition of “Development” – including but not limited to “placement . . . of any solid material,” *grading, removing . . of any materials” *alteration of the size of any structure” and “removal . . . of major vegetation” will lead to such greenskeeping involvement by the City of Pacifica, its Planning Department, and citizens. Before that happens, we respectfully request face-to-face consultation between City of Pacifica and the San Francisco Rec & Park Department and its greenskeepers.

Mod. 7.6 Environmental Justice [at LCLUP text, p. G-5, pkt.pg.292] CCC Suggested Mod'n
The fair treatment and meaningful involvement of people of all races, cultures, and incomes with respect to the development, adoption, implementation, and enforcement of environmental laws, regulations, and policies. ***Environmental Justice includes, among other things, protecting coastal natural resources and providing public access and lower-cost visitor and recreational opportunities and facilities for everyone – not to be denied on the basis of background, culture, race, color, religion, national origin, income, ethnic group, age, disability status, sexual orientation, or gender identity. Maximum access and recreational opportunities for all, and the protection, encouragement, and provision of lower-cost visitor and recreational opportunities, embody fundamental principles of Environmental Justice. Environmental Justice priorities include protection of existing affordable housing and protection of coastal resources, including sensitive habitats, watersheds, water quality, marine biodiversity, and biological productivity. The expense of sea level rise adaptation measures for coastal communities could heighten displacement of disadvantaged populations by increasing living expenses.***

SF Public Golf Alliance Notes to Glossary modification 7.6:

(1) Our four additional sentences, added to the CCC’s suggested modification (which we incorporate) consist of quotes from the Coastal Commission’s Environmental Justice Policy, adopted March 8, 2019, all as annotated in our Letter to Council of May 14, 2024 and Exhibit A thereto.²

(2) To go with a revised definition of Environmental Justice, we submit that a slight modification is in order for the April 2024 Draft LCLUP Guiding Policy PR-G-28³, as follows (with the two added words “policies, practices” highlighted in ***bold italics***).

Guiding Policies

PR-G-28 Environmental Justice. Strive to implement ***policies, practices,*** processes and procedures that promote environmental justice in support of the Coastal Commission’s environmental justice policy.

The effect of the two added words “policies, practices” would be an explicit recognition of Environmental Justice as a substantive policy of the LCLUP -- not merely procedural.

² Letter, S.F. Public Golf Alliance to Pacifica City Council, re LCLUP, 5.14.24

https://drive.google.com/file/d/1MzD33tKSxRZRCHCahq2RgFpQYXxPH9xO/view?usp=drive_link

³ City of Pacifica April 2024 Draft LCLUP, Mtg. #4.3, Chptr.3, Public Access and Recreation, P. 3-46
<https://pacificacityca.igm2.com/Citizens/FileOpen.aspx?Type=1&ID=1535&Inline=True>

TSUNAMI ALERT

Tsunami-related Guiding and Implementation Policies are too Vague and Overbroad

6.40-43 Coastal Resources Implementation Policy CR-I-43 [at LCLUP text, p. 6-27, pkt.pg.254]

6.44 Coastal Resources Implementation Policy CR-I-44 [at LCLUP text, p. 6-28, pkt.pg.255]

6.45 Coastal Resources Implementation Policy CR-I-45 [at LCLUP text, p. 6-28, pkt.pg.255]

5.8 Natural Hazards Guiding Policy NH-G-2 [at LCLUP text, p. 5-19, pkt.pg.218]
“Site and design development in 100-year floodplains and tsunami hazard zones to minimize hazard risk.”

5.11 Natural Hazards Implementation Policy NH-I-30 [at LCLUP text, p. 5-20, pkt.pg.219]

5.11 Natural Hazards Implementation Policy NH-I-31 [at LCLUP text, p. 5-20, pkt.pg.219]

The Draft LCLUP’s “Coastal Hazards” definition (Glossary, pg. G-4 at Pkt. Pg. 290) itemizes “coastal hazards” to include “tsunami” and “coastal flooding”. This is consistent with text from the Natural Hazards Section of the LCLUP, which states (Pg. 5-7; pkt. Pg. 216): “Pacifica can also experience flooding from coastal sources, which occurs as some combination of high tides, large wind-driven waves, storm surge, and/or tsunami waves.”

Figure 5-3, “Flood Zones,” from the Draft LCLUP, one of the illustrations of the Natural Resources Chapter (its place is held by a blank page 5-18 (Packet Pg. 217, but a copy appears at the back of the LCLUP, found at Packet Pg. 318 – see page 4 of this letter, below), shows a “Tsunami Evacuation Area” in green cross-hatch, occupying virtually the entire West Sharp Park, West Fairway Park, and Rockaway Beach neighborhoods, and the western side of Linda Mar on both sides of the Highway. (See copy of the map frat page 4 of this letter, below.) The map’s source for Tsunami information is identified in the bottom right-hand corner as “Tsunami Hazard Area for San Mateo County, Department of Conservation, State of California, 2021.”

The California Geological Survey’s annotations to the San Mateo County Tsunami Hazard Map state that the hazard area is derived from a 1-in-975-year period “probabilistic model” inundation, modified after consultation with “emergency managers, first responders, and subject matter experts”.⁴ How much the “probabilistic” inundation area was modified to create the “Tsunami Hazard Area”, the Geological Survey does not say. According to the Minutes of City Council’s April 15, 2024 LCLUP Study Session, when asked by Councilmembers Bier, Boles and Beckmeyer. Planning Director Murdock said it is “likely” that the Inundation area is smaller than the “Evacuation Area,” but he not say how much smaller and did not offer to find out.^{5, 6} So the

⁴ California Geological Survey, Tsunami Hazard Area Map, County of San Mateo, March 23, 2021, “Method of Preparation”: https://www.conservation.ca.gov/cgs/Documents/Publications/Tsunami-Maps/Tsunami_Hazard_Area_Map_San_Mateo_County_a11y.pdf

⁵ Minutes, Pacifica Council Meeting, April 15, 2024, at page 33
<https://pacificacityca.igmp2.com/Citizens/FileOpen.aspx?Type=15&ID=1454&Inline=True>

⁶ In his report to Council for the May 23, 2024 LCLUP Study Session, Director Murdock suggests adding a new definition for “Tsunami Inundation Zone” [apparently to be added to the Glossary], to reference a publication “Probabilistic Tsunami Hazard Maps for the State of California (Phase 2), California Department of Conservation (2023).

If City Council were to adopt the April 2024 Draft LCLUP without first determining the dimensions of a “Tsunami Inundation Area,” Pacifica residents would be stuck with the Tsunami Evacuation Area as mapped at Figure 5-3, “Flood Zones”. (Copy below.) And there is no telling how long they would be stuck with that limit on their ability to maintain, repair, and modify their homes and other structures.



On this basis, we object to NH-G-2, NH-I-30, NH-I-31, CR-I-43, CR-I-44, and CR-I-45 as vague uncertain and not ready for certification to the Coastal Commission.

Coastal Access Points Map (Figure 3.1) and Table 3-1

At the bottom of Page 7 of the Staff Report to the May 23 Agenda (Pacjet Pg. 10), the section captioned "Updates to Maps" says that Staff will prepare a revised Coastal Access Points Figure 3-1, as Council directed at a prior Study Session. Because Figure 3-1 is keyed to the Coastal Access Points verbal descriptions in Table 3-1 (Draft LCLUP, at pages 3-6 to 3-8, Packet Pages 118-120), revision of Figure 3-1 necessitates revision of Table 3-1. We recommend that Council make explicit that Table 3-1 be revised in conjunction with revision of Table 3-1.

Respectfully submitted,

Richard Harris

President, San Francisco Public Golf Alliance

cc: City Manager Kevin Woodhouse, Planning Director Christian Murdock, Deputy Planning Director Stefanie Cervantes, Planning Commission and Commissioners, City Clerk Sarah Coffey, Phil Ginsburg, Gen. Mgr., San Francisco Recreation and Parks Dept., Spencer Potter, Esq., San Francisco Recreation and Parks Dept.

Ringuette, Oceane@Coastal

From: Lyla Reinero <lyla.reinero@gmail.com>
Sent: Friday, May 2, 2025 2:46 PM
To: NorthCentralCoast@Coastal
Cc: Honey, Julian@Coastal; Ringuette, Oceane@Coastal; Bryan Reinero
Subject: Public Comment Thursday, May 8, Agenda Item 9a, City of Pacifica LCLUP

Dear Commissioners and Staff,

Full disclosure: We are borrowing language for this letter from other concerned citizens of Pacifica, however, the sentiment remains the same.

We want to thank you for the important work you do that cares for and protects our beautiful coastline, especially for the ongoing work you have been engaging in to protect California's coastal neighborhoods and their residents.

In terms of the **City of Pacifica LCLUP updates**, for the most part, the updates to the 1980 LCLUP are positive. However, after having personally attended dozens of planning and city council meetings, it's clear to note that the majority of Pacificans have concerns with parts of the LCLUP

1. Special Shoreline Resiliency Area policies (CR-I-38 to CR-I-44)

Pacificans are nearly unanimous in their agreement that SSRAs are bad for our community. The reasons are numerous and include (but not limited to):

- creating inequities between our neighborhoods
- short-term benefits for today, but not the long-term
- they go against nature-based solutions
- allowing potential future development not safe for the coastal zone

When the Pacifica City Council voted about the draft LCLUP, it was a 4 - 1 vote, with the dissenting councilmember casting a "no" vote due to the many unknown costs for SSRAs. Another councilmember voted "yes" for the purpose to "move the plan forward to the Coastal Commission, trusting they will make the best decision for Pacifica".

2. The Pedro Point Field.

- Retain the current zoning as Commercial Recreation or change to Conservation. Do not rezone to "Coastal-Residential Mixed Use".
- The Pedro Point field contains protected Environmentally Sensitive Habitat Areas (ESHA) as documented in the Coastal Commission and additional State Agency maps/documents.
- The field is an important protection against coastal flooding from the hills and future sea level rise.
- The neighborhood of Pedro Point only has one point of ingress and egress. Additional development would have negative safety consequences for residents and visitors. Most of the neighborhood is now in a high fire risk zone.

3. The Quarry and Sheldance

Retain these areas for permitting by the CCC (versus granting the City of Pacifica permitting authority).

Thank you so much for your time and consideration of our concerns.

Thanks and take care,
Lyla and Bryan Reinero
Pedro Point residents

Lyla cell: 415.596.2740

Honey, Julian@Coastal

From: Stan Zeavin <margstan@sbcglobal.net>
Sent: Friday, May 2, 2025 9:41 AM
To: Pacifica LUP Update
Subject: Pacifica LCLUP/SSRAs from Margaret Goodale

Honorable Commissioners,

I write to ask you to require the removal of SSRAs from Pacifica's newest LCLUP and focus on the potential effects over time of SSRAs on all of California's coast.

SSRAs have nothing to do with resilience. Although favored by a few vocal residents, continually walling off an ever rising ocean will not provide longterm resilience. Most Pacificans understand that the SSRAs benefit just five percent of our population - but only temporarily. The necessity to move pumps and rethink our northern wastewater infrastructure remains.

SSRAs encourage placing more new development in areas of increasing risk from sea level rise and put more people in hazard zones. Increasing density behind walls will eventually cause even more hardship and pain.

SSRAs sacrifice the public trust, beaches, habitat, and the interests of future generations as well as increase the inevitable costs of real resilience.

In Pacifica the current seawall and golf berm at Sharp Park have already eliminated any useful habitat for our threatened Snowy Plovers. Erosion north and south of the revetment at Rockaway has eliminated a native bee colony. Sadly, CCC approval of Pacifica's SSRAs would cause even more habitat loss for plovers and other migratory shorebirds that can rest and refuel only on beaches.

In Pacifica, your approval will encourage further extensive development in vulnerable areas that will in turn require more walls! Most frightening is the implication that permission could be given to any area that wants its own beach-destroying seawall. While piece by piece reducing public access, the cumulative effect will also cause a disastrous drop in shorebirds statewide.

The CCC staff has worked patiently with Pacifica for seven long years and greatly improved the Pacifica LCLUP, but you must not now agree to add the SSRAs.

How many areas of the California Coast will regard approval of our SSRAs as inspiration and rush to design their own SSRAs thereby limiting access to the Coast that you have so valiantly defended?

As guardians of the Coastal Act, I ask you, please, refuse to allow SSRAs.

Sincerely,
Margaret Goodale

Ringuette, Oceane@Coastal

From: Marj Davis <marjjean1@aol.com>
Sent: Friday, May 2, 2025 3:16 PM
To: NorthCentralCoast@Coastal
Subject: Thurs, May 8, Agenda Item 9a, City of Pacifica LCLUP.

Good afternoon Commissioners,

I wanted to share some concerns regarding the Pacifica LCLUP that is being presented to you for approval. Many of the updates to the 1980 LCLUP are positive. The document provides clarity through clearer definitions and guidelines on development in the Coastal Zone. Additionally, it addresses sea level rise — and particularly relevant to Pacifica — erosion. The updated LCLUP also writes in language for disclosures so that future generations be aware of local coastal hazards.

Within all the good, there are some areas of concerns, specifically the concept and addition of the SSRA's, Special Shoreline Resiliency Areas. In fact, CCC Staff may have been led to believe by Pacifica city staff that there is broad community support for the concept of SSRA's. This is simply not the case. The strong majority of public comments, many by current residents of the SSRA's geography, were opposed to the SSRA concept and/or were asking for clarification and justification for the concept and its inclusion in the LCLUP. The two areas identified as SSRA's, Beach Blvd and Rockaway as most know, are also in the **coastal hazard zone** and have already experienced decades of significant impact from tidal inundation. Yet, the **City of Pacifica is advocating to intensify development in these already hazardous areas, placing more people and future generations in harms way.** The SSRA's are presented as a way to buy time for a solution and repair to existing armoring, but they also allow for **increased development in these known hazard areas.** The vote in October 2024 was not unanimous by the Pacifica City Council, there was doubt and confusion even among the council members. Since that time, two of the members of that council have termed or opted out and been replaced with new members with new perspectives. SSRAs also create inequity between neighborhoods which was one of the repetitive objections from the public about the concept. They allow for exceptions in certain areas but not for the entire community.

Further concerning to me is how approval of the Pacifica LCLUP could set a precedent that could be followed up and down the coast of California. It effectively **diminishes the authority of the Coastal Commission**, it puts an undue increase in workload on the staff of both the city and the CCC (having to keep up on what could be multiple "special" arrangements city to city and/or exceptions) and **erodes the Coastal Act** which was voted in by the citizens of the **state of California** and should not be undermined by one City's proposal and requests. It is presumptuous for one city to request precedent setting changes to statewide legislation.

The good news is, the SSRA's are presented in a separate chapter and could easily be removed, leaving the bulk of the document constructive and practical.

With sincere gratitude for your attention,

Marj Davis
Pacifica Resident
District 4

Honey, Julian@Coastal

From: Mark Hubbell <mark.podc@gmail.com>
Sent: Friday, May 2, 2025 6:41 PM
To: Mark Hubbell
Cc: NorthCentralCoast@Coastal; Cindy Abbott; Peter Loeb
Subject: Re: "Coastal Commision Submition "

Follow Up Flag: Follow up
Flag Status: Completed

Coastal Commissioners,

This had been sent previously before the 5:00pm, May 2, deadline. I was unaware of the mistaken security constraints that my computer accidently applied. Please accept this identical but accessible message:

To: Coastal Commissioners,

This is my question, my concern, along with that of many others, is whether coastal area construction should take priority over the visitor-serving offerings that encourage revenue-generating tourism/visitation opportunities. In particular, the use of the concept of Builder's Remedy. Seemingly, this concept is designed to overcome any community opposition to development. In this case, how and who would be responsible for protection of the abundant wealth of nearby tidal-zone sea-life, as currently exists within close proximity to the mouth of Calera Creek, which flows through the proposed extensive construction zone. We, as citizens, deserve a detailed explanation of this possibility, that our City government is likely to endorse, against the better judgement, and wishes, of most of our community.

2.4 COASTAL DEVELOPMENT PRIORITIES

Concentrated Development

The Coastal Act seeks to concentrate new development along the coast in already-developed areas and areas where it will not adversely affect coastal resources (Section 30250). Pacifica's Local Coastal Land Use Plan reinforces the clear distinctions between areas of preserved open space (nearly 50 percent of the Planning Area) and established neighborhoods. It seeks to ensure that sensitive coastal open spaces on the Northern Coastal Bluffs and Pedro Point Headlands are preserved and enhanced, while promoting new development in and directly adjacent to the Rockaway Beach and West Sharp Park districts, and make these areas more commercially vibrant and transit-supportive, as described in Section 30252. These efforts are clearly defined in policies of this section as well as policies for each sub-area detailed in Section 3.3.

Coastal-Dependent, Visitor-Serving and Recreational Development

Section 30255 of the Coastal Act states that "coastal-dependent developments shall have priority over other developments on or near the shoreline." Lower-cost visitor and recreation facilities (Section 30213); recreational uses and development (Section 30221); and coastal-dependent industry (Section 30260) are specifically called out. Section 30222 provides that "the use of private lands suitable for visitor-serving commercial recreational facilities designed to enhance public opportunities for coastal recreation shall have priority over private residential, general industrial, or general commercial development."

Thank you,
Mark Hubbell

37 year Pacifica Resident
Phone: 415 902 6822

On Fri, May 2, 2025 at 4:54 PM Mark Hubbell <mrhnotes@icloud.com> wrote:

Open my shared document:



Coastal Commision Submission
Pages

--

Mark Hubbell — phone: 415 902 6822 — email: mark.podc@gmail.com

Ringuette, Oceane@Coastal

From: mark stechbart <mstechbart@msn.com>
Sent: Friday, May 2, 2025 3:38 PM
To: NorthCentralCoast@Coastal; mark stechbart
Subject: may 8 testimony item 9 pacifica: we will complain to Newsom

Importance: High

A large citizens group--savepacifica.org-- will appeal to Gov Newsom to overcome onerous, misdirected and mission creep CCC directives Re Pacifica LCP and LCLUP. The matter will become even more urgent when the implementation plan is rolled out.

Malibu and Pacific Palisades secured relief; Pacifica deserves the same protection. The Governor, the Trump administration, Congress and the Calif legislature are all taking a much more critical look at CCC behavior. Remember desal? The CCC is running on borrowed time as its cavalier attitude is slowly being controlled.

The CCC continues to usurp traditional city planning activities in favor of destructive takings. The CCC has to stop restrictive remodel, re-roofing controls. Stop favoritism in artificial carve outs like Special Resiliency Areas that only benefit the favored few to the disfavor of the majority. Tsunami "controls" are unnecessary and applied unequally across coastal towns.

The operational fixation with managed retreat will wreck Pacifica and must be rejected. Hwy 1 will be cut whenever the SF RV Resort is ordered by the CCC to dismantle its rock revetment.

Mind numbing controls over modernizing long term existing shoreline protections and time limits on structure "approvals" only poisons the well, prohibits 30 year mortgages and insurance. This all equals homeowner equity loss, inability to sell, the greying of town, property value decline and revenue loss to the city.

CCC demands title restrictions and abandoning rights at every turn, stripping homeowners bare if they dare to maintain their homes in any fashion that offends the controlling eye of the CCC.

Our group is confident the Governor will view corrosive effects of CCC behaviors on homeowners with disfavor. Too many people nationally are wondering what in the world is going on in Calif, and the CCC will probably become exhibit A.

all the best/

mark stechbart
mstechbart@msn.com

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background articles: first from 2 san mateo county supervisors..

1. Let's have conversation about sea level rise and our future

Pacifica Tribune sept 27, 2023.
Op/ed Ray Mueller, Don Horsley

Let's talk sea level rise and a call to action to bring best practices to bear on the issue.

Recent large storms have focused, yet again, public attention on climate change and general preparedness. From Burning Man to floods in Death Valley, events are forcing us to pay attention.

At issue in California are 840 miles of coast. Fifteen counties out of California's 58 are in the coastal zone. That includes 61 towns and cities. Recent figures on the economic activity in these 15 counties are dramatic. They represent 21 percent of California's land area but 69 percent of the population, over 26 million people. The 15 coastal counties generate 70 percent of the value of all statewide goods and services. They comprise 66 percent of all California jobs generating over \$662 billion in wages. But as we know, the coast is subject to sea level rise and a precise focal point is here in Pacifica.

Coastal planning is controlled by the California Coastal Commission. The Pacifica City Council is working to get a local coastal plan approved by the Coastal Commission. The LCP, when adopted, controls a lot of the economic activity and all the development and much of the remodeling west of Highway 1. The LCP is a very important document.

All 15 counties and all 61 coastal towns need an LCP approved by the Coastal Commission. That means 76 different plans across the coast. The LCP in all counties and towns will control the types and locations of shoreline protection and managed retreat.

We are not writing here to debate any policy choice.

We are bringing forward the notion that the state needs a major community conversation about what is planned for our coastal towns. What are the best

technological and scientific practices available? Who pays for lost homes or local economic activity? Are beaches under stress? Are solutions site-specific due to geology and erosion or one-size-fits- all?

Here's the problem: We suspect the elected leaders from the 76 jurisdictions have never been in a room together to talk this issue out. We also doubt the California Legislature has seen a list of potential erosion problems to beaches, homes, infrastructure and the local economy and the bill to protect, fix or move those items. Maybe the California Legislature should be in the meeting room as well.

More involvement and a substantive debate among the parties are essential.

We note \$1.7 trillion in yearly goods and services are generated by the 15 coastal counties. The continued health of these counties and their citizens across economic, environmental and social lines is critical to our future.

Climate change is not going to wait.

This piece came from Don Horsley and Ray Mueller. Mueller is the current San Mateo County supervisor from District 3; Horsley held the office previously.

2. The Coastal Commission 'tax' all Pacificans pay --- SF RV Resort

Pacifica Tribune

Jan 17, 2024. Page 5

The California Coastal Commission has it out for Pacifica. The Coastal Commission supports a bureaucratic solution to sea level rise known as "managed retreat" whereby the ocean is allowed unrestricted erosion east. Give up. This is bad news for long and narrow towns like Pacifica where even 10 feet of erosion can hit extremely expensive infrastructure or a house, hotel or affordable apartments.

Pacifica has about 35 percent of its current shoreline protected by structures like the golf course berm built in 1944 and the seawall at the pier built in 1984. They need maintenance and upgrades just like your roof needs attention every 20 years or so. The pier seawall has reached the end of its service life after 40 years and is scheduled for modernization.

The Coastal Commission doesn't support shoreline protections that keep our homes, businesses and infrastructure intact. That mindset is going to cost every homeowner in Pacifica a fortune.

Enter the RV Resort at 700 Palmetto Ave., opposite the southbound Palmetto onramp to south Highway 1. The resort has a 2016 rock revetment on the west-side shore to keep the property intact. The revetment needs work and minor improvement.

The Coastal Commission ruled the resort can't improve the rock revetment, and it must pull up all the rock by the end of 2024, demolish the entrance station, pull up all the paving and utilities. The city sewer line crossing the property must be moved east.

Managed retreat is coming and it will destroy the twelve-acre resort and bring erosion up to Palmetto Avenue and Highway 1 by the end of 2025. That is 23 months; the clock is ticking.

Here is the Coastal Commission reasoning: Staff has reviewed the proposal for this site and has concluded that there are no “existing structures” located there as that term is understood in a Coastal Act armoring sense, including because the site was originally developed in the 1980s (and the city sewer line replaced) after passage of the Coastal Act in 1976. Therefore, the RV Park and the sewer line do not qualify for shoreline armoring under Coastal Act Section 30235 tests, and for other coastal resource impact reasons the Coastal Act directs denial of the proposed project. In other words, since all structures on the property were built after the Coastal Act was enacted in 1976, they don’t deserve protection.

Here’s where all Pacifica homeowners get gouged by this order — moving the sewer line from current location inside the park to points east along Palmetto Avenue will cost Pacifica taxpayers more than \$4 million, subject to delay, inflation, etc. City Council approved this budget item in 2021.

What will this town will look like when the Coastal Commission starts punching holes in our neighborhoods?

The policy considerations are clear. We are deeply involved in setting a new coastal plan to guide neighborhoods west of Highway 1 and what type of protection they will enjoy. Of parallel concern is east side Pacifica needs all its sewer and Highway 1 infrastructure protected so we have a community that functions.

Do you live in Fairmont or Park Pacifica and think sea level rise won’t affect you? Think again! One line is just the start. Pacifica has hundreds of millions of dollars of pump stations, main sewer plant and water lines we all will pay to move. This one small part of a citywide system costs \$4 million or more to move and that equals about \$350 per household citywide.

Moreover, if the commission decides we cannot have rock protection at the west edge of the resort, when will the the CCC allow (or City Council demand) we have protection when erosion hits Palmetto Avenue and Highway 1? Who pays?

A solution is in front of us: We need a city-wide homeowner and infrastructure protection plan to keep the Coastal Commission honest. The RV resort needs to be saved and we then all save sewer line moving costs. We also save Highway 1.

We need a focused City Council to push the back. We need the involvement of the state Legislature. The Coastal Commission may be fine with “managed retreat” rolling up on Highway 1. Pacifica homeowners cannot afford it.

Mark Stechbart is a Pacifica homeowner.

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3. Aug 31 trib 2016

Shoreline Protection Needed Now.

By Jim Wagner, Mark Stechbart

A City Council decision on a shoreline protection policy is needed in the next 5 weeks. Coastal erosion will get worse in coming years. Pacifica homes, businesses and critical infrastructure are in danger of being flooded if nothing is done. Millions of dollars of our property value could be lost.

Two committees are studying the coast side erosion situation and will make technical and funding recommendations soon. One group comprises the US Army Corp of Engineers with various state agencies involved. The second consists of San Mateo County.

The problem is Pacifica does not have a Council policy on ocean erosion protection.

To make matters worse, some elements in town actually support the idea of “managed retreat” which sounds warm and fuzzy. In reality it’s a very dangerous idea. “Managed retreat” really means no government intervention and we all step back and let Mother Nature take her course. Another phrase for “managed retreat” is catastrophic ocean erosion. That’s means homes are lost, roads cut, sewer and water lines destroyed or moved at a huge taxpayer cost.

To make matters worse, in the absence of a Council policy, Pacifica Council member John Keener has been attending meetings where he toys with the idea of managed retreat. People attending these planning meetings really cannot tell which side of the issue Councilman Keener is on: protect Pacifica homes and businesses or let erosion chew through town.

Here’s the danger-- the shoreline is susceptible to erosion from Pacifica’s northern boundary to south of the golf course. Rockaway has problems. Linda Mar is exposed. Of special concern is everything west of and including Hwy 1. Thousands of residents, 75% of Pacifica businesses (most of the hotels), our golf course and most of the city infrastructure—sewer lines, water, telecommunications—are involved. Remember the Esplanade apartments eroding into surf and being torn down? A large portion of our affordable, workforce housing is in this area.

Some of the areas mentioned are protected by rock revetments or a seawall. But these features need maintenance. Unprotected areas in town will need installed rock. Any gaps in shoreline protection give ocean erosion a path to threaten town.

If the north end of town erodes, the middle school, trailer park, French bakery and Palmetto are affected. If for some reason the Beach Blvd seawall is not rebuilt or maintained, the central part of town is gone. If the golf course berm is abandoned, erosion approaches Hwy 1 real fast and the Fairway and south Palmetto neighborhoods are in trouble.

We have talked to a number of homeowners and businesses. They are very concerned their property values will take big hit. Their view is “managed retreat” is a code word for give up---on their homes and the town itself. Without firm protection measures in place, property owners seeking to sell will have to disclose fairly soon the erosion threat to their property. Who would buy anything under that threat? But if you are in the east side of town, at elevation, you also would see home values decline. If Pacifica becomes known as The Town Eroding into the Sea, who will buy anywhere in a dying town, with travel out of town on Hwy 1 in jeopardy of ocean erosion, with its central core falling apart and infrastructure damaged?

The technology to protect our shoreline and our homes exists, but we need the leadership. The clock is ticking. City Council must adopt a policy that says Pacifica will pursue all available resources and grants from federal, state, county and local sources to protect our shoreline, homes, businesses and infrastructure. We need to tell these committees where Pacifica stands.

Let’s support Congresswoman Jackie Speier in her ongoing work to fund the Beach Blvd seawall repair. Let’s join Senator Jerry Hill, Assemblyman Mullin and Supervisor Horsley as they advocate for a protected Pacifica in front of these two study committees.

Above all reject managed retreat. No one suggests SFO, 101 or Google offices be subjected to “managed retreat” Neither should Pacifica.

-30-

Honey, Julian@Coastal

From: Nancy Tierney <nhtierney@gmail.com>
Sent: Friday, May 2, 2025 1:01 PM
To: NorthCentralCoast@Coastal
Subject: May 8, Agenda Item 9a, City of Pacifica LCLUP

Coastal Commissioners:

In addition to support for the comments submitted by various environmentally minded community organizations, I want to submit a personal statement about the proposed Local Coastal Land Use Plan for the City of Pacifica. In the past few years, I have sat through numerous hearings on the LCLUP, along with discussions about other city plans--General Plan, Housing Element, Climate Action Plan update. We residents have wide-ranging views about how to treat our coast and hillsides, from a leave-it-alone attitude to a hard armoring approach. In the context of the LCLUP, the introduction of SSRAs has garnered vast opposition, from residents likely affected by building SSRAs to those supporting managed retreat. Building these structures serves no one. Further it is short-sighted, untested, likely expensive and a short-lived response to beach erosion and wave overtopping. Please reject the SSRA part of the plan and uphold the principles of the Coastal Commission to avoid hard armoring where possible and think more broadly about nature-based solutions.

thank you.

Nancy Tierney
Pacifica Resident

Honey, Julian@Coastal

From: Christopher Pederson <cpedersonlaw@gmail.com>
Sent: Wednesday, April 30, 2025 10:47 AM
To: NorthCentralCoast@Coastal
Cc: Carl, Dan@Coastal; Rexing, Stephanie@Coastal; Ringuette, Oceane@Coastal; Honey, Julian@Coastal; Warren, Louise@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update).

Dear Chair Cummings and Commissioners:

I urge the Commission to adopt a suggested modification to the Pacifica Land Use Plan Update to bring proposed policy PR-G-26 into compliance with Coastal Act section 30252.

Section 30252 promotes access to the coast primarily through modes of transportation other than the automobile. It also directs that new development affecting coastal access should provide adequate parking or “substitute means of serving the development with public transportation.” Proposed policy PR-G-26, however, imposes an across-the-board mandate for all new development to include off-street parking without allowing public transit as a substitute for off-street parking. That across-the-board mandate conflicts with Section 30252.

That inconsistency with the Coastal Act undermines the Coastal Act’s requirements to promote public transit and to minimize vehicle miles traveled. (See Pub. Resources Code, §§ 30252, 30253(d).) It also raises the possibility that implementation of the LUP update may conflict with state housing law. For example, the state’s ADU law limits when local governments may require ADUs to provide off-street parking, including when they are located within one-half mile of transit. (Gov. Code, § 66322.) The ADU law does include a Coastal Act “savings clause” (Gov. Code, § 66329), but policy PR-G-26’s parking requirements go beyond what the Coastal Act requires.

The Commission should therefore bring policy PR-G-26 into compliance with the Coastal Act by adopting a suggested modification to allow public transit to substitute for off-street parking requirements.

Thank you for your consideration of my comments.

Sincerely,

Christopher Pederson

Honey, Julian@Coastal

From: Pete Shoemaker <bentshoe@igc.org>
Sent: Friday, May 2, 2025 9:01 AM
To: NorthCentralCoast@Coastal
Subject: Thurs, May 8, Agenda Item 9a, City of Pacifica LCLUP

Pacifica Quarry and Shelldance Ranch permitting authority should be retained by the CCC.

Pete Shoemaker
351 Keith Ave.
Pacifica

Honey, Julian@Coastal

From: Pete Shoemaker <bentshoe@igc.org>
Sent: Friday, May 2, 2025 8:34 AM
To: NorthCentralCoast@Coastal
Subject: Pacifica Quarry permitting authority should be retained by the CCC

Pete Shoemaker
351 Keith Ave.
Pacifica

Honey, Julian@Coastal

From: Pete Shoemaker <bentshoe@igc.org>
Sent: Friday, May 2, 2025 9:00 AM
To: NorthCentralCoast@Coastal
Subject: Thurs, May 8, Agenda Item 9a, City of Pacifica LCLUP

Commissioners,

I have lived in Pacifica for 35 years and know the issues very well. I feel the proposal for SSRAs (Special Shoreline Resiliency Areas) is misguided and do NOT support it. We need to take the long view and band-aid fixes like this is not the way to go.

Pete Shoemaker
351 Keith Ave.
Pacifica

Ringuette, Oceane@Coastal

From: Peter Loeb <peterloeb1@gmail.com>
Sent: Friday, May 2, 2025 4:01 PM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update).

1. Remove Special Shoreline Resiliency Areas (SSRAs) from Pacifica's LCLUP. SSRAs in Pacifica's draft LCLUP set a dangerous precedent and violate the Coastal Act. SSRAs justify more intense and new development and permanent and increased hard armoring in identified vulnerable coastal hazard zones. The SSRA idea was invented to allow more intense development in a coastal hazard zone where it would not be allowed under the Coastal Act, and to provide the authority to continue to expand and rebuild hard armoring forever into the future. Without SSRAs, new development and more hard armoring would not be allowed in these hazard zones. SSRAs will encourage more intense new development in areas already identified as placing city infrastructure at risk and will require hard armoring to protect. There is a need for long range planning for moving critical city infrastructure, rather than increasing the necessity to protect infrastructure and increase costs and risks to the city and its residents.

There is significant community opposition to SSRAs that has been expressed in previous Pacifica City Council hearings and in submitted written comments. City Council support for the SSRAs is not unanimous. Organizations such as Surfrider, Green Foothills, and Sierra Club oppose this dangerous precedent.

2. Keep the Pacifica quarry as an area of deferred certification for permitting by the Coastal Commission.

3. Do not allow the Pedro Point (Calson) field to be rezoned to Residential Mixed Use; either keep it as Commercial Recreation or change to Conservation. The field contains Environmentally Sensitive Habitat Areas (ESHAs) and is an important protection against coastal flooding and sea level rise.

Peter Loeb
411 Maitland Road
Pacifica, CA 94044

50-year resident of Rockaway Beach (a proposed SSRA)
2-term former Pacifica Mayor and City Council Member
Co-founder of CPUP (Coalition of Pacificans for an Updated Plan and Responsible Planning)



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May 2, 2025

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RE: City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update) May 8th, 2025 Agenda Item 9a

Dear Coastal Commissioners:

I am writing in my capacity as President of the Pedro Point Community Association (PPCA), a neighborhood-based, all-volunteer nonprofit organization that serves as a strong and well-informed voice for the entire Pedro Point community and actively seeks to represent the expressed opinions and desires of its residents.

The PPCA is submitting the following comments on the City of Pacifica's 2025 LCLUP. Our comments are inclusion of our comments from March 7, 2022 regarding the LCLUP and Final Environmental Impact Report (GPU/FEIR) comment letters prepared on our behalf and submitted under separate cover by CEQA consultant Richard Grassetti, our attorney Brian Gaffney, and from consulting Coastal Ecologist, Dr. Peter Baye (see attachments).

Land use designations are the heart of the LCLUP, as a guiding document for the city's development and policy making decisions. That is why the purpose of this letter is to clearly state that **the PPCA emphatically objects** to the LCLUP and FEIR's proposed land use designation change to "Coastal Residential Mixed Use" (CRMU) **for the undeveloped San Pedro Avenue site (LD-I-21)** in Pedro Point (locally referred to as the **Pedro Point Field & Wetland**).

It should be noted that the PPCA made similar objections to this same CRMU designation change when it was proposed in a previous draft GPU and DEIR released for public comment in 2014, but never approved.

For decades, the PPCA has made extensive efforts to collect residents' input to inform city planners about our community's preferences for land use and development, and the value that is placed on maintaining our community's environmental assets and natural aesthetics to ensure harmony with the scale and character of existing neighborhood conditions. (These efforts and preferences have been well documented and are on record with the City of Pacifica, as well as on the PPCA website at www.pedropoint.org.)

Based on residents' continued input and support, the PPCA previously urged the City of Pacifica to revise the proposed land use for the Pedro Point Field site in the GPU/LCLUP to be designated as either "Low-Intensity Visitor-Serving Commercial" (LIVC) or "Conservation" (C). However, due to more recent evidence presented in CDP application 2-19-0026 related to the adjacent property's ESHA and hazards identification (which - under state law - development would be a nuisance) **it now appears that only the designation of "Conservation" (C) should be applied.**

Pedro Point residents have consistently registered strong preference for maintaining the existing open space of the Pedro Point field and opposition to any residential development, due to a number of expressed negative impacts, including multiple environmental hazards. In its current existing state, the field is an open space with seasonal wetlands.

It should be noted that **reasonably foreseeable development under the proposed CRMU land use designation** for the Pedro Point field would result in:

- 1. Significant adverse flooding impacts:** In its undeveloped state, the field serves as a natural catch basin for street run off from the surrounding the community and steep hillsides, and has historically been subject to flooding, occurring as recently as the 2021-2022 rainy season. Residents have also identified above ground, year-round spring percolation in the southwest corner of this property and the USGS ground water CoSMoS model show a shallow water table . Residential development adding more impervious surfaces would put businesses and homes along San Pedro Avenue at risk for even greater flooding and safety hazards.
- 2. Significant adverse biological impacts:** The development flowing from the CRMU designation would diminish an environmentally sensitive wildlife habitat. Neighbors have long-enjoyed sightings of many species of birds, animals and reptiles that inhabit the field, including documented photos of endangered species such as the California Red-Legged Frog (CRLF). The opportunities for wildlife encounters with diverse species found in and around the field have become an essential part of our neighborhood identity.
 - a. NOTE:** The City was made aware from the denial of CDP application 2-19-0026 dated 12/7/2020 where the adjacent unnamed watercourse to this property has been identified as ESHA by CA Dept. of Fish & Wildlife, the US Fish and Wildlife Service, and Senior Biologist Dr. Garske-Garcia of the California Coastal Commission (CCC), and that the CRLF require a minimum 300-foot radius foraging buffer zone. In addition, CCC found the watercourse likely also supports several other species as a habitat corridor. Coastal Act Section 30240 prohibits non-resource dependent development within an ESHA

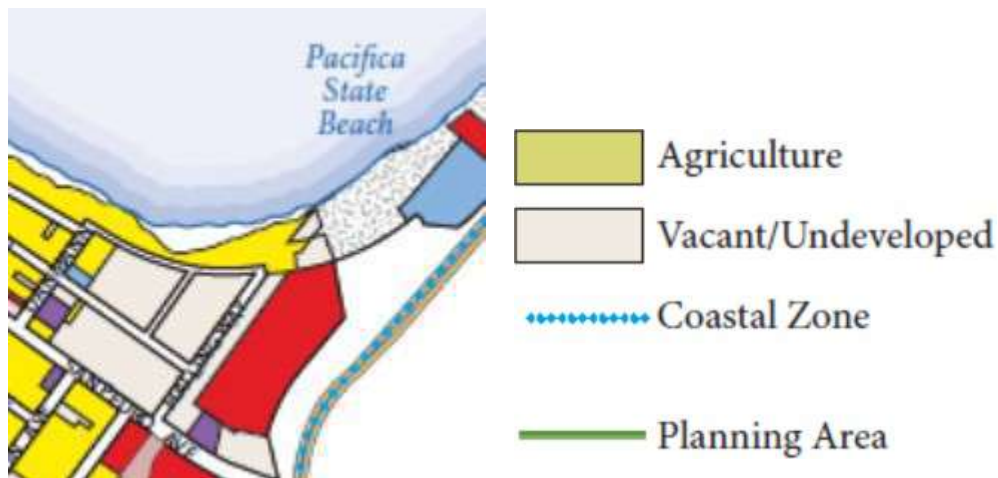
- 3. Significant adverse aesthetic impacts:** Natural environmental beauty is an integral part of the existing visual character of our small coastal Pedro Point community. Generations of residents have treasured the scenic environment of the field which affords unique views of the surrounding hillsides and provides an open space that serves as a park-like setting for residents and visitors. The proposed CRMU designation would have a substantial adverse effect on scenic vistas, substantially degrade the existing visual character of the neighborhood, and create new source of substantial light and glare which would adversely affect views.
- 4. Significant adverse traffic impacts:** With San Pedro Avenue serving as the only single-lane road in and out of the Pedro Point neighborhood, the increased traffic volume, congestion, and vehicle miles travel generated by CRMU-related residential development in the field would make this main thoroughfare un-navigable, and present significant adverse hazards for emergency access or evacuation. This increased traffic would also have related air quality and GHG impacts.
- 5. Significant adverse transportation, air quality and GHG impacts.** Our narrow streets are already choked with parked cars from increased commercial, residential and beach tourism parking demands. Increased parking generated by scores of CRMU-related residential units and visitors would result in excessive congestion and overwhelm on-street parking in our already overburdened neighborhood, and further exacerbate the transportation, air quality and GHG impacts.
- 6. Increase pedestrian safety hazards:** Increased street parking and vehicular traffic along San Pedro Avenue where there are no sidewalks or crosswalks would obstruct the only pedestrian routes, creating significant adverse safety hazards for pedestrians and emergency vehicles, and put residents (and pets) increasingly at risk.

Specific to the flawed data analysis the following deficiencies are identified:

The Proposed Land Use Designation Change Fails CEQA

The California Environmental Quality Act (CEQA) Section 15125 indicates that a valid Environmental Impact Report must include a description of the physical environmental conditions in the vicinity of the project. The City's attempt to change this land use designation is considered a project under CEQA: the City's required baseline characterization of this parcel as "Vacant"¹ as shown below is incorrect.

¹ Figure 2-2: "Existing Land Use in the Coastal Zone" at page 237 of 257.



The current baseline has already been determined by the Coastal Commission as an open field, grassland, and likely wetlands, as determined by the Coastal Commission, as shown below, and not merely as vacant.²



² Testimony of Coastal Commission staff ecologist Dr. Lauren Garske-Garcia Item 16: Application No. 2-19-0026 (Rhodes Mixed-Use Development, Pacifica), Exhibit 11, Page 13 of 24. Application was ultimately denied by the Coastal Commission.

The LCLUP Fails to Recognize the Coastal Commission's ESHA Designation

Critically, the Draft LCLUP also fails to include areas already established as Environmentally Sensitive Habitat Areas (ESHA) by the Coastal Commission, which had already established the wetlands to be a Red-Legged Frog habitat. The City's report omits that information, as shown below in Figure 4-3: Potential Environmentally Sensitive Habitat Areas and inexplicably ignores multiple rounds of prior testimony submitted by the PPCA documenting the active red-legged frog breeding habitat along San Pedro Avenue.

Figure 4-3:

Potential Environmentally Sensitive Habitat Areas



In contrast, reports from the rejected building application from a proposed development in an adjacent parcel determined that the Wetlands is a Red-Legged Frog habitat and ESHA.

In a recent report analyzing an adjacent parcel (yellow rectangle below), Coastal Commission staff ecologist Dr. Lauren Garske-Garcia³ concluded the following: "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 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 here."

³ Available at: <https://www.coastal.ca.gov/meetings/agenda/#/2021/3> Item 16: Application No. 2-19-0026 (Rhodes Mixed-Use Development, Pacifica), Denied by Coastal Commission. Note that even this report does not include subsequent red-legged frog sightings from Pedro Point residents and visitors, available at iNaturalist.org. This memorandum cites prior testimony submitted by Pedro Point residents Michael Vasey, Sheila Harman, and Jon Harman, and prior testimony submitted by the PPCA's retained biologist, Dr. Peter Baye.



These omissions, in addition to prior submissions by the PPCA, render the City of Pacifica's 2025 LCLUP invalid and in conflict with the Coastal Act and CEQA.

Additionally, the CCC has been in communication with the City of Pacifica for more than a decade to express concern about negative impacts of development on the habitats of a watercourse adjacent to the Pedro Point Field, which likely would meet the one-parameter definition of wetlands under the Coastal Act. The CCC asked that a one-parameter wetland delineation be conducted. The City denied the request. The CCC has also identified the Pedro Point Field site as potential wetlands. Any development on this site would reduce the biological productivity or water quality of the wetlands due to runoff created by new development, in violation of the Coastal Act.

Julian Honey
Coastal Planner
North Central Coast District
California Coastal Commission
May 2, 2025
Page 7 of 7

Comment letters submitted by Pedro Point residents, our environmental and legal experts provide additional specific details how a proposed change of the existing land use of the Pedro Point Field to CRMU is reasonably likely to cause direct and indirect significant adverse impacts and would conflict with CEQA and Coastal Act policy. They also document how these impacts have not been adequately analyzed or mitigated in the FEIR. Nor does the LCLUP identify any meaningful reasonable alternatives to the proposed CRMU designation that are 1) environmentally superior, 2) consistent with Coastal Act policies, and 3) compatible with the unique coastal character of Pedro Point and conservation of its important remaining open spaces.

Most notably, the LCLUP Land Use map for the entire City of Pacifica shows the one main property proposed for the new CRMU designation is the privately-owned, undeveloped San Pedro Avenue Field & Wetland site. We assert that the LCLUP should be a guiding document for the development and policy making decisions of the entire community – not just for the benefit of a single landowner.

In conclusion, based on our counsel's review of the law, our experts' opinions - and in order to address the noted LCLUP and FEIR deficiencies as well as be in compliance with CEQA and Coastal Act policies – **the most expedient solution would be to change the proposed land use designation for the Pedro Point Field from CRMU to Conservation** (which is most consistent with the current state of the undeveloped property) and utilize this site as a nature-based climate adaptation site to protect our homes and streets as provisioned under SB379. The PPCA strongly encourages the Commission to consider this option, so that we can all look forward to soon having an updated LCLUP that will put Pacifica on the map for being a smart, vibrant, environmentally savvy, jewel of a city.

Respectfully submitted on behalf of the Pedro Point Community Association,



Allison West
PPCA President
akwest365@gmail.com

Attachments:

Richard Grasseti, Grasseti Environmental Consulting (GEC) providing comments on CEQA

Peter R. Baye, Ph.D., Coastal Ecologist, Botanist on the Draft Environmental Impact Report

Brian Gaffney, Esq., Providing Comments and Legal Analysis on the Draft Environmental Impact Report and Final EIR



Mr. Christian Murdock
Deputy Planning Director
Planning Department
1800 Francisco Boulevard
Pacifica, CA 94044
cmurdock@pacifica.gov

June 3, 2022

SUBJECT: COMMENTS ON FINAL ENVIRONMENTAL IMPACT REPORT FOR PACIFICA
GENERAL PLAN UPDATE PROJECT

Dear Mr. Murdock:

Grassetti Environmental Consulting (GECO) is submitting this comment letter on behalf of the Pedro Point Community Association (PPCA). As Principal of GECO, I have prepared these comments based on my 40 years of experience preparing and reviewing California Environmental Quality Act (CEQA) documents. This letter addresses responses to my February 28, 2022 comment letter on the draft EIR.

It should be noted that the City provided less than a week for review of over 3600 pages of information. This is wholly inadequate for both the public and decisionmakers. It would be impossible for the Planning Commissioners to have read the entire staff report and understood all of the numerous deficiencies in the EIR, including those summarized below. In the comments and responses. Given the paucity of review time allotted by the City, my responses to the FEIR responses are, by necessity, general.

Summary of Comments

- 1). The FEIR failed to respond to my comments in good faith, instead just cutting and pasting generic responses that missed the point of my comment entirely. See notes after comments below.
- 2) The FEIR willfully ignored detailed evidence of significant impacts and instead impermissibly relies on vague plan policies and generic setting information for the entirety of its analysis. An EIR, programmatic or not, may not ignore substantial evidence of significant impacts. It may not substitute vague platitudes (i.e. policies) for analysis and evidence.
- 3) The FEIR impermissibly defers consideration of potentially significant impacts to future environmental reviews, some of which may never occur. In fact, this EIR sets

up a shell game where the City says impacts will be evaluated later and then many of the projects will use this EIR to claim no additional work is needed.

4) The FEIR continues to assume that vague, generic, unenforceable, plan policies would reduce impacts to less-than-significant levels while at the same time acknowledging that additional mitigation measures may be needed and would be developed in subsequent project-level CEQA reviews. It's not possible to have less-than-significant program-level impacts while at the same time have potentially significant project-level impacts. In fact, this EIR is tacitly acknowledging that its policies do not mitigate impacts to less-than-significant levels.

5) This EIR ignores evidenced based conclusions of expert agencies with respect to biological impacts and ESHA's.

6) This EIR misapplies the "substantial evidence" standard for significance determination, particularly with respect to biological impacts and ESHA's. It states that when there are two competing conclusions the impact can be determined in later environmental reviews. It then punts on describing the two competing conclusions and providing an evidence-based conclusion as to which opinion it is accepting. Yet, at the same time it concludes that the impacts are less than significant because some future review will deem it so. This is illogical and subverts the purpose of CEQA.

7) The EIR repeatedly engages in "magical thinking", and tautologies, without evidence or analysis. It repeatedly assumes effective mitigation of impacts by lists of policies that are 1) vague, and 2) unenforceable, to reduce impacts to less than significant.

8) The EIR impermissibly defers numerous studies that need to be done to support its conclusions, to future reviews. An EIR may not use future studies as mitigation.

9) The EIR fails to address on-the-ground impacts of the Plan's land use designations, instead just waves its hands via vague policies.

In summary, the EIR is fatally defective. In my 40 years of experience, this is one of the most deficient program EIR's I have ever encountered. This type of avoided analysis document, where the plan was just assumed to mitigate all of its own impacts, and absent any real analysis, was prevalent into the 1990's but faded out because the courts repeatedly found it impermissible.

Specific Deficiencies:

Original Comment:

The PPCA requested a thorough evaluation of the potential effects of the General Plan Update ("GPU" or "the Project") on the undeveloped San Pedro Avenue Site ("the Site" or "San Pedro Avenue Site"). This letter identifies deficiencies in the General Plan Update Draft EIR ("DEIR") with respect to the Site. It is based on my reading of the

proposed GPU and DEIR, as well as a review of sensitive resources and hazards from available sources. General deficiencies are described first, followed by some specific comments on the adequacy of technical analyses.

Under CEQA, the GPU DEIR must focus not only on the direct impacts, but also on the secondary effects that will follow from adoption of the General Plan update (CEQA Guideline 15146). The City is not relieved from considering reasonably foreseeable impacts of the Project on specific parcels, including the Site here.

Given the voluminous information provided by experts on the undeveloped San Pedro Avenue Site, including extremely detailed evidence presented in the California Coastal Commission 2020 Staff Report on the Rhodes Mixed Use Development ("CCC Staff Report") proposed for the Site, this GPU and DEIR must consider that information, submitted herewith.

The land use designations are the heart of the General Plan. Because the General Plan serves as "the constitution for all future developments" within the City once a land use for a site is designated, applicants have certain development rights. Therefore it is essential that the City of Pacifica ("City") fully consider environmental values and constraints prior to re-designating parcels, not after a parcel is re-designated. This GPU fails to do that, and, as detailed below, the DEIR fails to adequately or accurately assess impacts of the proposed re-designation of the undeveloped San Pedro Avenue Site.

Response Deficiency:

The FEIR fails to respond in good faith. It defers analysis to future documents even though it is in possession of substantial evidence of significant unmitigable impacts.

Original Comment

Inadequacy of Project Description

The DEIR must present a clear and stable project description. The DEIR's project description is inadequate because it fails to narratively or graphically identify which specific areas/parcels would be re-designated or changed by the Project. Instead, the DEIR focuses solely on general buildout numbers, as if site conditions were uniform throughout the City.) This failure makes it very difficult for the reader to understand how various areas of the City would be affected by implementation of the proposed Project.

DEIR Land Use Chapter 3.1 does include a very small- scale map of existing land use designations, which, critically shows the undeveloped San Pedro Avenue Site land use designation as "Commercial" but omits consideration that the Site is zoned "Commercial Recreation". The General Plan states, "The land directly west of the Pedro Point Shopping Center was identified as a commercial recreation site in the previous General Plan, and has been zoned for general commercial uses." By failing to include this information, the DEIR does not serve its informational disclosure

requirement. The public should not be forced to ferret out information and connect the dots to understand the Project and its impacts. This combination of incomplete and incorrect information renders the DEIR Project Description useless as the basis for determining impacts of the proposed GPU.

Given the limited number of sites proposed for designation changes in the GPU, the DEIR should clearly identify them narratively and graphically, and include discussion of reasonably foreseeable impacts and mitigations to those sites.

Further, the DEIR project description compares the Project to the existing plan, but does not provide the necessary information on existing on-the-ground conditions from which to conduct the impact assessment. With limited exceptions, CEQA does not permit plan-to-plan analyses. Per the CEQA Guidelines (Section. 15126.2) "In assessing the impact of a proposed project on the environment, the lead agency should normally limit its examination to changes in the existing physical conditions in the affected area as they exist at the time the notice of preparation is published, or where no notice of preparation is published, at the time environmental analysis is commenced." In order to adequately conduct this assessment, the EIR must identify which parcels are undeveloped, what their existing development potential is, and how that potential would change with the project. The actual impacts would be the difference between the existing undeveloped state and full development of a site under the new designation. Full development under the existing 1980 GP would be the No Project Alternative.

Response Deficiency:

The FEIR fails to address this comment in good faith. No additional information is provided in the responses. The EIR continues to use a plan-to-plan analysis in certain sections.

Original Comment:

Inadequate Project Objectives

The DEIR's stated Project Objectives (pp. 2-9 and 2-10) are so general and vague that they cannot be effectively used to fulfill their primary purpose, namely to guide development and assessment of an adequate range of alternatives. This deficiency is reflected in the Alternatives chapter (p. 4-2), which substitutes three different "criteria" for use in developing and selecting project alternatives (although those criteria are similarly vague and generic).

Response Deficiency:

The FEIR fails to address the discrepancy between the Project Objectives and the alternative selection criteria. It also fails to have realistic project objectives.

Original Comment:

Inadequacy of Impact and Mitigation Discussion

The DEIR fails to disclose that the undeveloped San Pedro Avenue Site is currently zoned commercial recreation, with a floor area ratio (FAR) of 0.2, which means that total development footage cannot exceed 20% of the site area. This current designation promotes non-intensive recreational use of the Site, retaining most of the Site in open space. If, for example, a 2-story recreational facility were constructed, only 10% of the San Pedro Avenue Site would be disturbed, and sensitive resources and environmental hazards on the remainder of the Site could be avoided.

The GPU would re-designate the Site as Coastal Residential Mixed Use, which would allow housing or commercial uses at an FAR of 0.5 (DEIR Figure 2.1-2 and table 2.3-1). That FAR does not include roads or parking, which could result in further environmental impacts. The DEIR fails entirely to address potential Project impacts at this Site, and never even mentions the Site in its impact analyses.

For most topics, the DEIR only provides over-generalized statements of impacts, lists plan policies, and then assumes – without explanation – that the policies would effectively reduce all impacts to less-than-significant levels, without any analysis of the pre-policy impact or the actual applicability and effectiveness of the policies to the impact. In contrast, for traffic, the DEIR does conduct an intersection-specific assessment. This shows that it is possible for the DEIR to conduct a site-level analysis for the areas where changes in land use are proposed. The DEIR should be revised to conduct those analyses for all of the resource categories.

In short, the DEIR fails to go through CEQA's required steps of first disclosing impacts and whether those impacts are potentially significant, and only then discussing proposed mitigation measures including their feasibility. As the court stated in Trisha Lee Lotus v. Department of Transportation:

“The purposes of Section 21801 are that there be some evidence that the alternatives or mitigation measures in the EIR were considered by the decision-making agency and, as the Supreme Court stated in a similar situation, that there be a disclosure of the analytic route the.... agency traveled from evidence to action.” And, “The EIR does not, however, include any information that enables the reader to evaluate the significance of these impacts.” (p.13)
“Caltrans compounds this omission by incorporating the proposed mitigation measures into its description of the project and then concluding that any potential impacts from the project will be less than significant. As the trial court held, the “avoidance, minimization, and/or mitigation measures”, as they are characterized in the EIR, are not “part of the project”. By compressing the analysis of impacts and mitigation measures into a single issue, the EIR disregards the requirements of CEQA.” (p. 15).

Here, the proposed changes in land use designations would cause the loss of biological resources, recreational resources, and flood storage from the Site. The DEIR must first disclose and analyze those impacts, determine the significance of each impact, and then discuss whether and how general plan policies and mitigation would reduce the impact. The applicability of policies must be identified, as well as their effectiveness. If policies are assumed to be mitigation, then they must be presented in a manner that assures their implementation on any particular site.

California courts have made it clear¹ that cities are not obligated to implement all of the General Plan's policies applicable to a site, therefore the GPU's proposed policies cannot be assumed to mitigate for development of a site under the GP. Further, applicable measures must be included in a Mitigation Monitoring and Reporting Program.

At a planning level, a more effective, enforceable, monitorable, mitigation would be to change the undeveloped San Pedro Avenue Site land use designation to Open Space or retain the 0.2 FAR Commercial-Recreation designation, rather than the proposed intense 0.5 FAR designation.

However, given CEQA's requirement to compare impacts of a project (or plan) to existing on-the-ground conditions, impacts of development even at an FAR of 0.2 must be assessed, and mitigated to the extent feasible. This is particularly important given CEQA's infill exemptions. It is likely that, for some of the sites, no additional CEQA review will occur, and the impacts will not be addressed at all. This DEIR's lack of detailed analysis would allow the City to play a shell game in deferring analysis that may never occur, and thereby fails to meet CEQA's purpose of full disclosure.

In summary, the DEIR fails to address the impacts of land use changes proposed under the GPU because it concludes that GPU policies would mitigate any undisclosed impacts. In essence, the DEIR claims that the Project would mitigate itself – despite the fact that there may be significant unmitigable impacts of implementing the proposed land use designations on a given site, as is the case for the undeveloped San Pedro Avenue Site.

A City may approve a project if it "substantially complies" with the planning policies – full compliance is not required. This means that assuming full implementation of policies is a best-case scenario, not a likely scenario as required for CEQA review.

Also, many of the plan policies are couched in language such as "to the extent feasible", "strive to", "study", "consult with", "coordinate with" and similar vague, non-committal terms that fail to assure that mitigation will be implemented or, if implemented, will

¹ An action, program, or project is consistent with the general plan if, considering all its aspects, it will further the objectives and policies of the general plan and not obstruct their attainment." [Citation.]' [Citation.] State law does not require perfect conformity between a proposed project and the applicable general plan...." (*Friends of Lagoon Valley*, *supra*, [154 Cal.App.4th at p. 817](#), [65 Cal.Rptr.3d 251](#).)

be successful in reducing a project's impacts to a less-than-significant level. There are numerous examples of this in the Plan, including Policies CO-G-3, CO-I-1, CO-G-4, CO-I-19-23, SA-I-29, SA-I-109, SA-I-12, and many, many more. In addition, as can be seen in these examples and many others, in many cases, the City relies on policies that assume mitigation by other agencies and jurisdictions over which it has no control. Under CEQA mitigation measures must include performance standards, rather than just aspirational goals or deferred studies. The DEIR must also translate these policies to enforceable measures before it can consider any potentially significant impacts to have been mitigated to less than significant.

The City is required to comply with SB379 as stated in Chapter 1.2, General Plan Requirements: "Climate Change Adaptation and Resiliency Legislation (SB 379)...requires the safety elements of general plans to be reviewed and updated to include climate adaptation and resiliency strategies." SB379 further requires the identification of hazard zones that can serve as mitigation areas for said hazards, yet the GPU fails to identify any properties in Pacifica for such mitigation and it is insufficient to only set "Coastal Resiliency Policies" when areas like the Undeveloped San Pedro Avenue Site would qualify to be designated as hazard mitigation sites due to its many hazard vulnerabilities and ESHA designation.

In addition to rendering the DEIR inadequate, these omissions subvert the basic purpose of planning, which is to plan so that appropriate land uses can be located so as to avoid or minimize environmental impacts. Rather than plan for sensitive sites such as the undeveloped San Pedro Avenue Site, as detailed below, the City is proposing to adopt non-protective land uses (at the Site, Coastal Residential Mixed Use) and then use general policies (full compliance with which is not mandatory) relying mostly on deferred studies to reduce impacts. This approach (and the underlying DEIR) is inadequate because it uses magical thinking - in theory, the plan policies reduce all impacts to less than significant in spite of on-the-ground evidence to the contrary - rather than evidence-based analyses.

Response Deficiency:

The FEIR fails entirely to address this comment in a substantive and good faith way. It fails to address specific evidence provided in the comment. Instead is simply defers the analyses to a future date, and continues to insist that while the policies are not mitigation, they will, in fact mitigate all of the impacts to a less than significant level and, if not, that will occur in some future environmental review. This is illogical and impermissible

Original Comment:

Criteria of Significance/Topics Addressed

As detailed in specific comments below, the DEIR fails to focus its impact analysis to reasonably foreseeable types of impacts. Instead, the impacts are just the same questions in the standard Initial Study checklist. This is an EIR, not an Initial Study.

This DEIR is required to identify and focus on impacts of importance, not the items in the CEQA Initial Study checklist. For example, impacts and mitigation measures should be called out for each special-status species that may be affected by buildout of the plan.

Response Deficiency:

The EIR fails to address this comment.

Original Comment:

Biological Resources

As noted in a letter submitted separately by Dr. Peter Baye, the Site is valuable habitat for special status species. In addition, habitat values and flooding hazards for the adjoining Rhodes development site, which extend onto the San Pedro Avenue Site, are presented in painstaking detail by expert technical specialists in the California Coastal Commission's Staff Report for the proposed development of that site (CDP Application 2-19-0026, dated 12/7/2020), which was never referenced or considered in this DEIR. Willful omission of this critical information on its face renders this DEIR invalid.

This DEIR does not accurately disclose the San Pedro Avenue Site's conditions as part of the environmental setting, disclose project impacts, nor discuss the effectiveness of plan policies as mitigation.

For example, Figure 3.7-3 in the Biological Resources chapter shows this Site as having no sensitive or critical habitat values, yet evidence by Dr. Peter Baye as well as that provided by the Coastal Commission's expert biologists shows that it does have sensitive species and habitats. The CCC Staff Report for the adjacent Rhodes project site considers that entire site to be an Environmentally Sensitive Habitat Area ("ESHA"), and similar habitat exists on the San Pedro Avenue Site, making it likely that that Site also would be ESHA. Similarly, the DEIR focuses on the National Wetlands Inventory while excluding detailed wetlands mapping of this Site, thereby rejecting on-the-ground analyses in favor of large-scale remote mapping (see Figure 3.7-2). The CCC Staff Report on the Rhodes site further identifies the undeveloped San Pedro Avenue Site as "likely wetlands" (see Figures 1a and 1b, on p. 134 of the CCC Staff Report).

Similarly, as described in the CCC Staff Report, a California Red Legged Frog ("CRLF") was found in the drainage separating the undeveloped San Pedro Avenue Site from the Rhodes site, and would clearly have important habitat on the San Pedro Avenue Site (see CCC Staff Report Figure 2, on p. 134). Further, given that the frog was found at the upstream end of the drainage on the Site, and likely traveled up that drainage to the point where it was encountered, it is likely that a much greater portion of the San Pedro Avenue Site is CRLF habitat than shown on that figure.

The lower portion of San Pedro Creek also has been found to be habitat for the special-status tidewater goby (see Baye report referencing Sutter and Kinziger, 2019). This

habitat may be adversely affected by contaminated runoff that would result from development of the undeveloped San Pedro Avenue Site. This impact also must be addressed in the DEIR.

Finally, the proposed site designation fails to meet CCC policies, as summarized in the 2020 Staff Report for the denied Rhodes Project (emphasis added):

“In short, the portion of the site within the Commission’s permitting jurisdiction is all ESHA and undevelopable for the proposed range of uses and structures. Although some provisions in the LCP allow for reductions to habitat buffers in the event that the buffer renders the site undevelopable, in this case it is the actual ESHA area that is affected by development (and not the buffer from it), and the City has approved development in the portion of the property that is within its jurisdiction and subject to the LCP. The Commission finds that there is no location on the site that is outside of ESHA and sufficient to protect the habitat, as required by the Coastal Act, and, as such, there aren’t siting and design conditions available to the Commission to correct this Coastal Act inconsistency. Therefore, the Commission finds the proposed project inconsistent with the Coastal Act’s sensitive habitat protection requirements cited above, requiring project denial.”

*Given the evidence already provided to the City that much, if not all, of the undeveloped San Pedro Avenue Site is environmentally sensitive habitat and likely qualifies as an ESHA, the DEIR must investigate to what extent those conditions exist on the Site. It is entirely possible that the whole Site is ESHA, and therefore should be designated as such in the General Plan. Alternatively, designating it for residential mixed-use development likely assures a significant environmental impact will occur, and the DEIR must disclose those potential impacts. **It should be noted that this is not a disagreement among experts, as the DEIR provides NO evidence supporting its finding that the proposed land use designation for that Site would not result in a significant impact, and the City is in receipt of substantial evidence to the contrary.***

Response Deficiency:

The EIR fails to address this comment in a meaningful way. Rather it states that there is substantial evidence in both directions and this will be resolved in future CEQA reviews. It also must meaningfully address the expert, evidenced based conclusions presented by the commenting consulting and agency biologists. This EIR is required to consider the competing conclusions now, not later. It fails on both counts.

Original Comment:

Land Use Environmental Setting

Chapter 3.1, overall: The list of General Plan Policies that purportedly reduce impacts fails to describe how or to what degree impacts are reduced. Please add this analysis for Impacts 3.1-1, 3.1-2, and 3.1-3, considering that not all General Plan policies are required to be implemented by the City.

With respect to the undeveloped San Pedro Avenue Site please address the clear non-compliance of the GPU's high intensity land use designation with the policies of promoting wetlands preservation (CO-I-4), minimizing impacts of coastal development on vegetation (CD-I-16), Open Space Conservation and Habitat Protection (LU-I-13), Open Space Preservation (OC-G-5), Protection of Creeks and Riparian Areas (CO-G-9), Other Environmentally Sensitive Areas (CO-G-11), and Protection of Biological Resources with New Development (CO-I-26). Please revise the land use designation for consistency with the policies.

As noted in its denial in Application CDP-2-19-0026², the California Coastal Commission has declared this area an ESHA. Please revise the land use designation for consistency with Verification of ESHA (CO-1-27) and Management of ESHA (CO-I-28), and Habitat Preservation (CO-I-31).

Chapter 3.1 also needs to be revised to address potential land use incompatibilities. As written there is no assessment of any potential incompatibilities of proposed new land uses with existing nearby uses. For example, the DEIR does not disclose if intense residential development of the undeveloped San Pedro Avenue Site will have noise or traffic incompatibilities with surrounding residential land uses. The DEIR also does not disclose if intense residential development of the undeveloped San Pedro Avenue Site would displace flood storage, important habitat, or recreational uses of the Site.

Response Deficiency:

The EIR fails to address this comment in good faith and instead, once again, punts the analysis to some future date. It should be noted that the Coastal Conservancy also commented similarly that the policies in the Plan are in conflict with reality.

Original Comment:

Geology, Soils, and Seismic Risk

CEQA Guideline 15126.2(a) states, "The EIR shall also analyze any significant environmental effects the project might cause by bringing development and people into the area affected.....Similarly, the EIR should evaluate any potential significant impacts of locating development in other areas susceptible to hazardous conditions (e.g., floodplains, coastlines, wildfire risk areas) as identified in authoritative hazard maps, risk assessments, or in land use plans addressing such hazard areas." As

² CCC Denial of CDP-2-19-0026, Exhibit 11 at
<https://documents.coastal.ca.gov/reports/2021/3/F16a/F16a-3-2021-exhibits.pdf>

described below for both geology and hydrology, this DEIR fails to conduct these required assessments.

Response Deficiency:

The EIR fails to address this comment in good faith and instead, once again, punts the analysis to some future date.

Original Comment:

Figure 3.6-1: The undeveloped San Pedro Avenue Site appears to include areas of Very High and Medium liquefaction potential (DEIR Figures 3.6-1 and 3.6-2). It also may be subject to impacts from coastal erosion, as described on DEIR p. 3.6-14 and elaborated upon in the CCC's Staff Report for the adjacent Rhodes site. Yet the GPU's land use designation seems oblivious to these threats, and the DEIR fails to analyze these reasonably foreseeable potential Project impacts.

Response Deficiency:

The EIR fails to address this comment in good faith and instead, once again, punts the analysis to some future date.

Original Comment:

Impacts 3.6-1 and 3.6-3: The DEIR provides no analysis of the potential impacts of proposed land use designations shown in the GPU land use map.

It also fails entirely to address whether and how the listed general policies will reduce impacts such as those identified above for the undeveloped San Pedro Avenue Site to less-than-significant levels and then inexplicably finds the impacts to be minimal. The DEIR just lists the policies and concludes that the impacts would be less than significant. There's a big difference between reducing impacts, which is what the policies are aimed at, and reducing them to a less-than-significant level. The DEIR must be revised to analyze the impacts of the proposed changes in land use compared to existing conditions.

Further, please provide monitorable, enforceable mitigation for these potentially severe impacts on the undeveloped San Pedro Avenue Site. The proposed policies mostly involve future studies, which do not suffice as mitigation, particularly in the absence of express performance standards. Please note that Geologic Hazard Abatement Districts do not ensure mitigation, but rather just shift funding responsibilities for mitigation from the City to buyers of subject properties.

Response Deficiency:

The EIR fails to address this comment in good faith and instead, once again, punts the analysis to some future date. Vague, unenforceable policies continue to be substituted for actual mitigation.

Original Comment:

Hydrology and Water Quality

The Hydrology and Flooding section introduction states that the section analyzes water resources “in relation to the location of projects comprising the buildout of the Proposed Project [General Plan].” (DEIR p. 3.5-1). However no such analysis is included relative to those projects.

The DEIR also states, “San Pedro Creek has a history of flooding in the Linda Mar area,” (p. 3.5-8) but the DEIR provides no information on flooding at the sites where land use is proposed to intensify substantially as a result of the GPU. The PPCA has provided the City with photos of the Site entirely flooded to a depth of several feet, indicating that substantial flooding has occurred on the Site. This flooding occurred again in the 2021-2022 rainy season. The City has been provided with evidence (attached hereto and submitted by PPCA under separate cover) that the Site has been frequently flooded by San Pedro Creek, the adjacent hillsides, is subject to flooding under projected sea level rise, and is subject to tsunami hazards.

The 2014 DEIR for the Pacifica General Plan Update at Figure 3.5-1 showed the Site is subject to flooding from tsunami runup. However, without explanation, that figure has been omitted from this DEIR. Why was this figure deleted? As noted in the DEIR and the CCC Staff Report, tsunami runup is a hazard that will only worsen with sea level rise.

As detailed in the CCC Staff Report on the adjacent Rhodes project site,

“With respect to coastal hazards, the site would be subject to potential future impacts from the combination of shoreline retreat, sea level rise, wave runup, and inundation. As proposed, the structures are not sufficiently sited and designed to avoid such problems, and the northernmost building includes a basement structure, all of which would be subject to flooding over the expected life of the development. “

“... Commission staff geologist Dr. Joseph Street estimates that with 6.6 feet of sea level rise, wave runup with the 100-year storm could extend about 170 feet inland of the shoreline (i.e., of MHTL) across the beach and flatter ground near San Pedro Creek, northeast of the project site. This provides a more conservative estimate of potential storm wave runup beyond the future shoreline position. If 170 feet of horizontal wave runup distance is added to the projected future shoreline position (with 5.7 or 6.6 feet of sea level rise), the seaward portion of the project site (where Building 1 is proposed which includes the two-story surf shop on the first floor, office and storage space on the second floor, and a 3,500 square-foot basement subgrade) would be affected by wave runup within the 100-year analytic period referenced by the LCP.

“Another option to approximate the future wave runup hazard risk to the site is to add projected sea level rise to the current FEMA 100-year flood elevation. Adding the medium-high risk scenario sea level rise projection (+5.6 to +6.9 feet by 2090-2100) to the current FEMA 100-year flood elevation of the VE zone (representing areas within the 1% annual chance coastal floodplain which have additional hazards associated with storm waves) where the proposed project is located (i.e., at +17 feet elevation) yields a rough estimate of the future 100-year flood elevation in the range of +22.5 to +24 feet NAVD88. Given the existing elevations at the project site (+16 to +21 feet) and the elevations of the topographic lows adjacent to the project site (+16 to +17 feet NAVD88), it is thus possible that future flood elevations in this range affect at least a portion of the project site toward the end of the project life. At the very least, additional, more detailed analysis would be needed to rule out this possibility.”

The San Pedro Avenue Site is lower than the adjacent Rhodes project site, rendering it even more likely to be impacted from coastal flooding hazards. This should have been considered in planning for Site development in the GPU, as well as in determining impacts in the DEIR.

Because the undeveloped San Pedro Avenue Site is located in the Coastal Zone, designation of the Site must be assessed for compliance with Coastal Commission policies with respect to flooding and sea level rise. The Commission's draft policies state that LCP's must integrate sea level rise into planning, using a maximum rise of 6.3 feet, which is based on the best available science as identified in the CCC Staff Report on the adjacent Rhodes project site. The Coastal Commission Guidance is that coastal hazard risks should be avoidable, wherever feasible. Increasing development density on an undeveloped site subject to sea level rise and other coastal hazards is the opposite of this Coastal Commission Guidance. The DEIR fails to even mention this impact.

The DEIR Hydrology discussion fails to even disclose, much less address, the tsunami and sea-level-rise flooding related hazards associated with this Site (see, for example, DEIR Figure 3.5-1, which shows the Site as having no flooding hazards), in spite of detailed evidence of those hazards provided by the California Coastal Commission's experts. The DEIR consistently ignores on-the-ground analyses, in favor of less-accurate generic mapping, rendering the document inadequate.

In the 2014 DEIR for that General Plan Update, the Hydrology section included an impact on sea level rise (Impact 3.5-6). Inexplicably that impact, as well as Impact 3.5-7 in the 2014 DEIR, have been deleted, leaving a jump from Impact 3.5-5 to 3.5-8 in the 2022 DEIR. Given that the undeveloped San Pedro Avenue Site would be subject to extreme flooding from sea level rise and that runoff to and from the project Site would aggravate that flooding (see CCC comments), this issue must be addressed in the stormwater runoff and flooding discussions of this Project and DEIR.

Also, designating this Site for development is in clear violation of sea-level-rise policies in the General Plan Update itself. The fact that the City is willing to adopt a land use plan that is inconsistent with the policies in the very same plan shows that the policies are not effective mitigation.

As mitigation, please revise the land use element of the Project to eliminate the density increases in these areas and respond to the real hazards by reducing densities instead. The DEIR – by suggesting unenforceable policies that conflict with the underlying land use as mitigation measures - does not comply with CEQA requirements for mitigation, which must be both enforceable and verifiable, and must actually mitigate the impact.

Response Deficiency:

The EIR fails to address this comment in good faith and instead, once again, punts the analysis to some future date. Specific evidence of site flooding is ignored in favor of non-specific regional studies.

Original Comment:

Public Services and Recreation

The draft general policies state that access to coastal areas shall be maximized. Yet, this Project would eliminate an informal access trail to the beach, as documented in a set of photos and maps attached to our previous comments. The DEIR entirely omits coastal access outside of designated parks from its impact analysis. The Project's impacts on access through the Site are not disclosed in this DEIR.

Response Deficiency:

The EIR fails to address this comment in good faith and instead, once again, punts the analysis to some future date. Specific evidence of loss of coastal recreational resources is ignored in favor of deferred studies.

Original Comment

Alternatives

As described previously, the DEIR fails to provide clear objectives as required by CEQA. This makes it impossible to determine if the range of alternatives in the DEIR is appropriate. This deficiency is compounded because project alternatives must reduce impacts compared to the Project and, as detailed above, the DEIR fails to adequately address potential impacts of the Project on nearly all topics.

Further, it appears that the alternatives addressed in Chapter 4 are merely planning options and not actual CEQA alternatives. In fact, the three criteria on DEIR p. 4-2 state that the alternatives were selected to, "bracket the range of choices that have the broadest support from the community", apparently without specific consideration of their potential environmental impacts.

There is no location-specific analysis of flooding in this DEIR alternatives chapter, which results in inaccurate statements that the no-project alternative would increase flood hazards compared to the proposed Project. Certainly this is false at the site. More generally, why wouldn't ongoing flood-improvement projects continue with or without the project?

Response Deficiency:

The EIR fails to address this comment in good faith and instead, once again, punts the analysis to some future date. Specific evidence of site flooding is ignored in favor of deferred studies.

Original Comment

Planning Issues

As noted above, the proposed Coastal Residential Mixed Use land use designation at the undeveloped San Pedro Avenue Site would subject increased densities of people to geologic and hydrologic hazards, in non-conformance with both City and LCP policies. Further, sensitive ecological resources would be adversely affected, which also undercuts and fails to comply with the policies regarding those resources. As noted in the DEIR's Project Description, the Site's current Commercial Recreation land use designation is most similar to the GPU's proposed Visitor Serving Commercial (VC) designation. The VC designation, "allows uses that create public access to the coastal setting and are adaptable to changing environmental conditions: campgrounds, rustic lodging, concession stands, warming huts, outdoor event sites, and similar uses. Development may occur up to a 0.20 FAR, but must have an overall very low-intensity character on sites of more than one acre. Buildout is assumed at 0.05 FAR, recognizing the large land areas and minimal buildings expected to support recreational uses." (DEIR, p. 2-14.)

It is clear that, given the Site location and constraints, the GPU's policies as applied at the undeveloped San Pedro Avenue Site can only be met by applying the Conservation (C) General Plan designation and associated zoning because of the on-site hazards and identified ESHA.

Response Deficiency:

The EIR fails to address this comment in good faith and instead, once again, punts the analysis to some future date. The response is illogical and wholly deficient as it ignores the obvious impacts of site development.

Conclusions

The FEIR fails entirely as an informational disclosure document because of its assumptions that plan policies would equate to mitigation and its failure to actually analyze the effectiveness and likelihood of implementation of those policies.

Further, with respect to the undeveloped San Pedro Avenue Site, the DEIR ignores voluminous substantial evidence of major flooding hazards and ecological sensitivity of the Site. While an FEIR may choose between conflicting experts' opinions, if they are all supported by evidence, it cannot fail to disclose evidence contrary to its own conclusions, which, with respect to both flooding and biological resources on the Site, are entirely unsupported by either evidence or analysis.

It is my professional opinion that, given the extent of the flaws detailed above, which reflect only a partial review of the FEIR's technical sections, this document does not meet CEQA requirements for full disclosure of potential impacts of the proposed project.

The FEIR's failure to address the deficiencies cited above are especially critical because of the potential for "infill" residential projects to be permitted under CEQA exemptions for such projects as permitted under CEQA Guideline Sections 15182, 15183, and 15183.3. While this DEIR promises further site-specific CEQA review, it is possible that for some developments, no such review could occur. In those cases, given the analytical deficiencies in this DEIR, the impacts will not be assessed in any CEQA document. This sort of CEQA "shell game" would deprive the public and decision-makers of meaningful information and input in the environmental review process.

The DEIR anticipates Initial Studies and Negative Declarations for future compliance with CEQA, but contends that it is not required to currently assess Project level impacts. (DEIR, p. 44.) Such an assertion violates one of CEQA's prime policies; the prohibition against ignoring foreseeable impacts for later analysis is clearly proscribed by CEQA. *Laurel Heights*. Cases citing *Laurel Heights* continue to disapprove of program or plan-level EIRs that defer impact analysis: "tiering is not a device for deferring the identification of significant environmental impacts that the adoption of a specific plan can be expected to cause." *California Native Plant Soc. v. City of Rancho Cordova* (2009) 172 Cal.App.4th 603, 623-25.

Therefore, it is my professional opinion that the entire DEIR should be rewritten and recirculated for public review. The current approach of setting plus policies equals mitigation should be discarded and the impacts of the proposed land use changes should be carefully evaluated. Please feel free to contact me at 510 849-2354 if you have any questions regarding the comments herein.

Sincerely

A handwritten signature in cursive script, appearing to read "Richard Grassetti".

Richard Grassetti

Mr. Christian Murdoch
June 3, 2022

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Principal
Grassetti Environmental Consulting

Attachment A: Grassetti Qualifications

Richard Grassetti

PRINCIPAL

Expertise

- CEQA/NEPA Environmental Assessment

Principal Professional Responsibilities

Mr. Grassetti is an environmental planner with 40 years of experience in environmental impact analysis, project management, and regulatory compliance. He is a recognized expert on California Environmental Quality Act (CEQA) and National Environmental Policy Act (NEPA) processes. He also has served as an expert witness on CEQA and planning issues. Mr. Grassetti regularly conducts peer review and QC/QA for all types of environmental impact analyses, and works frequently with public agencies, citizens groups, and applicants. He has managed the preparation of over 80 Federal and state environmental impact assessment documents, as well as numerous local agency planning and permitting documents. Mr. Grassetti also has prepared over 300 technical analyses for these documents. He has analyzed the environmental impacts of a wide range of projects including infrastructure improvements, ecological restoration projects, waste management projects, mixed-use developments, energy development, military base reuse projects, and recreational facilities. In addition to his consulting practice, Mr. Grassetti regularly conducts professional training workshops on NEPA and CEQA compliance, and was a lecturer for over 15 years at California State University, East Bay, where he taught the University's class on environmental impact assessment.

Professional Services

- Management and preparation of all types of environmental impact assessment and documentation for public agencies, applicants, citizens groups, and attorneys
- Peer review of environmental documents for technical adequacy and regulatory compliance
- Expert witness services

- Assisting clients in Federal and California environmental impact assessment process compliance
- Preparation of technical analyses for impact assessments
- Preparation of project feasibility, opportunities, and constraints analyses, and mitigation monitoring and reporting plans

Education

University of Oregon, Eugene, Department of Geography, M.A., Geography (Emphasis on Fluvial Geomorphology and Water Resources Planning), 1981.

University of California, Berkeley, Department of Geography, B.A., Physical Geography, 1978.

Professional Experience

1992-Present	Principal, GECO Environmental Consulting, Berkeley, CA
1994-2012	Adjunct Professor, Department of Geography and Environmental Studies, California State University, East Bay, Hayward, CA
1988-1992	Environmental Group Co-Manager/ Senior Project Manager, LSA Associates, Inc. Richmond, CA
1987-1988	Independent Environmental Consultant, Berkeley, CA
1986-1987	Environmental/Urban Planner, City of Richmond, CA
1982-1986	Senior Technical Associate - Hydrology and Geology - Environmental Science Associates, Inc. San Francisco, CA
1979-1981	Graduate Teaching Fellow, Department of Geography, University of Oregon, Eugene, OR

Professional Affiliations and Certifications

Member and Past Chapter Director, Association of Environmental Professionals, San Francisco Bay Chapter
Member, International Association for Impact Assessment

***Publications
and Presentations***

Grassetti, R. *Understanding Environmental Impact Assessment – A Layperson's Guide to Environmental Impact Documents and Processes*. 2002 (Revised 2011)

Grassetti, R. *Round Up The Usual Suspects: Common Deficiencies in US and California Environmental Impact assessments*. Paper Presented at International Association for Impact Assessment Conference, Vancouver, Canada. May 2004.

Grassetti, R. *Developing a Citizens Handbook for Impact Assessment*. Paper Presented at International Association for Impact Assessment Conference, Marrakech, Morocco. June 2003

Grassetti, R. *CEQA and Sustainability*. Paper Presented at Association of Environmental Professionals Conference, Palm Springs, California. April 2002.

Grassetti, R. and M. Kent. *Certifying Green Development, an Incentive-Based Application of Environmental Impact Assessment*. Paper Presented at International Association for Impact Assessment Conference, Cartagena, Colombia. May 2001

Grassetti, Richard. *Report from the Headwaters: Promises and Failures of Strategic Environmental Assessment in Preserving California's Ancient Redwoods*. Paper Presented at International Association for Impact Assessment Conference, Glasgow, Scotland. June 1999.

Grassetti, R. A., N. Dennis, and R. Odland. *An Analytical Framework for Sustainable Development in EIA in the USA*. Paper Presented at International Association for Impact Assessment Conference, Christchurch, New Zealand. April 1998.

Grassetti, R. A. *Ethics, Public Policy, and the Environmental Professional*. Presentation at the Association of Environmental Professionals Annual Conference, San Diego. May 1992.

Grassetti, R. A. *Regulation and Development of Urban Area Wetlands in the United States: The San Francisco Bay Area Case Study*. Water Quality Bulletin, United Nations/World Health Organization Collaborating Centre on Surface and Ground Water Quality. April 1989.

Grassetti, R. A. *Cumulative Impacts Analysis, An Overview*.
Journal of Pesticide Reform. Fall 1986.

1986, 1987. Guest Lecturer, Environmental Studies
Program, University of California, Berkeley.

REPRESENTATIVE PROJECT EXPERIENCE

IMPACT ASSESSMENT REGULATORY COMPLIANCE SEMINARS

Mr. Grassetti has conducted numerous CEQA and NEPA compliance seminars for entities including:

- Alameda County Waste Management Authority
- San Francisco County Transportation Authority
- West Bay Sanitary District
- North Coast Resource Management, Inc.
- Element Power Company
- Tetra Tech Inc.
- Impact Sciences Inc.
- Northwest Environmental Training Center (over 10 workshops)
- California State University East Bay (14 years teaching Environmental Impact Assessment)

PREPARATION OF ENVIRONMENTAL IMPACT ASSESSMENT DOCUMENTS (partial list)

Salt River Ecosystem Restoration Project EIR. GECO managed preparation of an Environmental Impact Report for the restoration of a large area of former marsh and open channel near Ferndale in Humboldt County. The project includes creation of a new seven-mile-long river channel and a 400-acre wetland restoration. Major issues include biological resources, land use, hydrology/flooding, and construction impacts (noise, air quality, traffic.). Client: Humboldt County Resource Conservation District.

Aramburu Island Shoreline Protection and Ecological Enhancement Project Initial Study. Mr. Grassetti managed preparation of an Initial Study for a proposal by the Audubon Society to stabilize the shoreline and improve bird and seal habitat on the 34-acre Aramburu Island site in Marin County. Major issues include biological resources, hydrology/flooding, and construction impacts. Client: Wetlands and Water Resources.

Forward Landfill Expansion Project EIR. Mr. Grassetti managed preparation of an EIR for a 170-acre expansion of the Forward Landfill in San Joaquin County. This is the third EIR that Mr. Grassetti, has prepared for this landfill over a period of 15 years. Major issues include air quality, health and safety, biological resources, and traffic. Client: San Joaquin County Community Development Department.

San Francisco PUC WSIP Projects. Mr. Grassetti assisted in the preparation of the San Francisco Public Utility Commission's Water Supply Improvement Project Program EIR, as well as two other CEQA documents for smaller projects under that program. Major issues include hydrology, water supply, and fisheries. Client: Water Resources Engineering/Orion Associates.

Parsons Slough Project CEQA Review. Mr. Grassetti is managing preparation of an expanded Initial Study for a tidal sill (dam) project to reduce scour in Parsons Slough, an arm of the ecologically sensitive Elkhorn Slough. This IS may lead to either an EIR or Mitigated Negative Declaration. Major issues include fisheries, marine mammals, water quality, aesthetics, and construction issues (noise). Client: Vinnedge Consulting/ Elkhorn Slough National Estuary Reserve.

Hamilton Wetlands/Todds Road CEQA Review. Mr. Grassetti managed preparation of the CEQA Initial Study for an alternative access road for truck traffic to the Hamilton Wetlands Restoration Project to reduce the project's potential noise impacts. Major issues included noise, biological resources, and cultural resources. Client: California State Coastal Conservancy.

San Francisco Bay Water Trail Program EIR. Mr. Grassetti assisted in the preparation of the EIR for a "water trail" for small non-motorized boats throughout San Francisco Bay. The project involves designation of 115 access sites as well as policies for stewardship and education. Major issues include disturbance of birds, marine mammals, water quality, historic resources, and wetlands. Client: California State Coastal Conservancy.

Dutch Slough Restoration Project/Oakley Community Park EIR. Mr. Grassetti managed preparation of the EIR for a 1400-acre wetland restoration and 80-acre community park on former diked lands in Oakley. Major issues include fisheries, water quality, historic architectural resources, and wetlands. Client: California State Coastal Conservancy.

Vineyard RV Park Expansion Initial Study. Mr. Grassetti managed preparation of the Initial Study for an expansion of a mobile home park in Solano County near Vacaville. Major issues included flooding, biological resources, and traffic. Client: Vineyard RV Park.

Pinole Creek Restoration Project Initial Study. Mr. Grassetti prepared the CEQA Initial Study for a 2.5-mile long creek restoration project in the City of Pinole. Major issues included biological resources, flooding, and water quality. Client: City of Pinole.

Knobcone Subdivision Initial Study. Mr. Grasseti managed preparation of an Initial Study for a 5-unit subdivision in Richmond. Major issues include geologic hazards and biological resources. Client: City of Richmond.

Baxter Creek Restoration Project CEQA Consulting. Mr. Grasseti assisted City of El Cerrito staff in the preparation of an Initial Study for the proposed Baxter Creek Restoration Project. Client: City of El Cerrito.

West of Fairview Subdivision Supplemental EIR. Mr. Grasseti managed preparation of a Supplemental EIR for a 700-unit residential development in Hollister. Major issues include traffic, biology, and utility services. Client: City of Hollister.

American Canyon Initial Studies. Mr. Grasseti managed preparation of two initial studies for commercial and warehouse projects in the City of American Canyon. Major issues include traffic, biological resources, and geology. Client: City of American Canyon.

Pelandale-McHenry Specific Plan. Mr. Grasseti prepared the Specific Plan for an 80-acre residential/commercial development in Modesto. Major issues included land use, traffic, and provision of adequate infrastructure. Client: Meritage Homes

Monte Cresta Roadway Extension Initial Study. Mr. Grasseti prepared an Initial Study/Negative declaration for a roadway extension in San Juan Hills area of the City of Belmont. Major issues included slope stability and growth inducement. Client: City of Belmont

Bethel Island Water Supply Project. Mr. Grasseti prepared an Initial Study for a proposed new water supply system for the community of Bethel Island in Contra Costa County. Major issues included growth inducement, archaeological resources, and biological resources. Client: Bethel Island Municipal Improvement District.

San Francisco Bay Estuary Invasive Spartina Control Project EIR/EIS and Addendum. Mr. Grasseti managed preparation of the programmatic EIR/EIS on a plan to control invasive cordgrasses throughout the San Francisco Bay. Major issues included endangered species, visual resources, water quality, and human health and safety. Mr. Grasseti subsequently prepared an addendum for the addition of a new herbicide to the Spartina Control Program. Client: California State Coastal Conservancy.

Aptos Sanitary Sewer Replacement Project Initial Study. Mr. Grasseti prepared an Initial Study for the replacement of a storm-damaged sanitary sewer pipeline in Santa

Cruz County. Major issues included cultural resources and biological resources. Client: Harris and Associates.

Eastern Dublin Specific Plan Supplemental EIR. Mr. Grassetti managed preparation of a Supplemental EIR for an 1100-acre mixed-use project in the City of Dublin. Major issues included traffic, biological resources, public services, noise, and air quality. Clients: Shea Homes and Braddock and Logan Services.

Consolidated Forward Landfill Project EIR Update. Mr. Grassetti managed preparation of an EIR for the expansion and consolidation of the Forward Landfill and the Austin Road Landfill near Stockton, CA. Major issues include toxics, water quality, traffic, biological resources, and air quality. Client: San Joaquin County Community Development Department.

Pleasanton IKEA Initial Study. Mr. Grassetti prepared a Draft Initial Study for a proposed new 300,000 sq. ft. IKEA store in Pleasanton. Major issues included biology, traffic, and visual resources. Client: IKEA Corporation.

Central Contra Costa Household Hazardous Waste Facility Studies: Mr. Grassetti assisted Central Contra Costa Sanitary District staff in the preparation of a Planning Study and subsequent CEQA Initial Study on feasibility, siting, and environmental issues associated with the development of a Household Hazardous Waste collection program and facility in Central Contra Costa County. Client: Central Contra Costa Sanitary District.

Southwest Richmond Flood Control Project IS. Mr. Grassetti prepared the Initial Study and Mitigated Negative Declaration for a proposed flood control project in the City of Richmond. Client: City of Richmond.

Wickland Oil Martinez Tank Farm Expansion Project EIR Management. Mr. Grassetti served as an extension of City of Martinez Planning Department staff to manage all aspects of the preparation of the CEQA review for a 2,000,000-barrel expansion at Wickland's Martinez oil storage terminal. We prepared the NOP, RFP, assisted in consultant selection, and managed the consultant preparing the EIR on this project. Client: City of Martinez.

Austin Road Landfill Expansion Project EIR Update. Mr. Grassetti prepared an Initial Study and Supplemental EIR updating a 1994 EIR for the expansion of the Austin Road Landfill near Stockton, CA. Major issues include water quality, traffic, biological resources, and air quality. Client: San Joaquin County Community Development Department.

Wayside Road Sewer Expansion Initial Study. Mr. Grassetti prepared an Initial Study and Mitigated Negative Declaration for a proposed new sewer system in the Wayside Road area of Portola Valley. Client: West Bay Sanitary District

Los Trancos Woods Sewer Expansion Initial Study. Mr. Grassetti prepared an Initial Study and Mitigated Negative Declaration for a proposed new sewer system in the Los Trancos Woods area of Portola Valley. Client: West Bay Sanitary District

Arastradero Road Sewer Expansion Initial Study. Mr. Grassetti prepared an Initial Study and Mitigated Negative Declaration for a proposed new sewer system in the Arastradero Road area of Portola Valley. Client: West Bay Sanitary District

Lower Orinda Pumping Station Initial Study/Negative Declaration. Mr. Grassetti prepared an Initial Study/Negative Declaration for renovating or relocating a wastewater pumping plant in Orinda, CA. Client: Central Contra Costa Sanitary District.

Shell Martinez Breakout Tanks Project Initial Study. Mr. Grassetti prepared an Initial Study for two proposed new wastewater storage tanks at Shell's Martinez Manufacturing Complex. Major issues included air quality, odors, and visual impacts. Client: City of Martinez.

Shell Martinez Biotreater Facility Initial Study. Mr. Grassetti prepared the Initial Study/Negative Declaration for a proposed new biotreater facility for Shell's Martinez Manufacturing Complex wastewater treatment plant. Major issues included water quality, wetlands, growth-inducement, and cumulative impacts. Client: City of Martinez.

Vallejo Solar Power Plant Initial Study. Mr. Grassetti prepared a CEQA Initial Study/Negative Declaration for a proposed photovoltaic array intended to power a water pumping plant in the City of Vallejo. Major issues included land use compatibility and visual quality. Client: City of Vallejo.

Ranch on Silver Creek CEQA Consulting. Mr. Grassetti prepared the Mitigation Monitoring and Reporting Program and other CEQA compliance tasks for a large residential/golf course project in San Jose. Client: Sycamore Associates.

Morgan Hill Ranch Initial Study Analyses. Mr. Grassetti prepared the Hydrology, Geology, and Hazardous Materials analyses for the Morgan Hill Ranch Mixed Use Project Initial Study. Client: Wagstaff and Associates.

East Bay MUD Water Conservation Study. Mr. Grassetti conducted the field portion of a major water conservation survey for the East Bay MUD service area. Client: Water Resource Engineering.

East Bay MUD Pipeline CEQA Analyses. Mr. Grassetti prepared technical analyses for two EIRs regarding proposed new East Bay MUD pipeline in Sacramento, San Joaquin, and Calaveras Counties. Client: Uribe & Associates.

Sunnyvale Landfill Power Plant CEQA Initial Study. Mr. Grassetti prepared an Initial Study for a proposed landfill gas-fueled power plant at the Sunnyvale Landfill

in Santa Clara County. Recommendations for mitigation and further environmental review were prepared. Client: 3E Engineering.

Fremont Redevelopment Project Hydrologic Analysis. Mr. Grassetti prepared the hydrology section for an environmental impact report for four redevelopment projects in Fremont. Client: Wagstaff and Associates.

Ostrom Road Landfill Hydrologic Analysis. Mr. Grassetti prepared the hydrology section for an environmental impact report on the proposed vertical expansion of an existing Class II landfill in Yuba County. Client: ESA Associates.

Pinole Portion of the Bay Trail Hydrologic, Geologic, and CEQA QA/QC Analyses. Mr. Grassetti prepared the hydrologic and geologic analyses for a CEQA Initial Study on a half-mile segment of the Bay Trail in the City of Pinole. Mr. Grassetti also provided CEQA process consulting services on this project. Client: Placemakers.

Kennedy Park Master Plan Hydrologic and CEQA QA/QC Analyses. Mr. Grassetti prepared the hydrologic analyses for an environmental impact report on a proposed park master plan in the City of Napa. Client: Placemakers.

U.S. Navy Bay Area Base Closure and Re-Use Environmental Studies. Mr. Grassetti assisted in the NEPA/CEQA review process for US Navy Base Closures and Re-Use for the San Francisco Bay Area. Work tasks include CEQA compliance overview, internal peer review, quality control reviews, and preparation of technical analyses. Specific projects are summarized below:

Mare Island Naval Shipyard EIR/EIS Studies. Mr. Grassetti prepared the hydrology section of the EIR/EIS on the shipyard closure and reuse program, conducted a peer review of the geology section, and conducted QA/QC review of the entire EIR/EIS. Client: Tetra Tech, Inc.

Oak Knoll Naval Medical Center EIR/EIS Studies. Mr. Grassetti conducted a CEQA/NEPA quality control and peer review of the EIS/EIR prepared for disposal and reuse of the Oak Knoll Naval Medical Center EIS/EIR in the City of Oakland. Client: Tetra Tech, Inc.

NAS Alameda EIR/EIS Studies. Mr. Grassetti prepared the hydrology section of EIR/EIS on reuse of the Naval Air Station, conducted a peer review of the geology section, and conducted QA/QC review of the entire EIR/EIS. Client: Tetra Tech, Inc.

Naval Station Treasure Island EIR/EIS Studies. Mr. Grassetti prepared the hydrology section of the EIR/EIS on reuse of Naval Station Treasure Island, conducted a peer review of the geology section, and conducted QA/QC review of the entire EIR/EIS. Client: Tetra Tech, Inc.

Hunters Point Naval Shipyard EIR/EIS. Mr. Grassetti assisted in the responses to comments and peer review of the EIR/EIS for the Hunters Point Naval Shipyard in San Francisco. Client: Uribe and Associates.

Naval Fuel Depot Point Molate. Mr. Grassetti conducted overall internal peer reviews of several drafts of the EIR/EIS for reuse of the former Naval Fuel Depot Point Molate in Richmond, CA. In addition, he prepared the Noise, Socioeconomics, and Cultural Resources sections of the EIS/EIR. Client: Uribe and Associates.

CEQA/NEPA PEER REVIEW AND EXPERT WITNESS CONSULTING PROJECTS

Jackson State Forest CEQA Review. Mr. Grassetti prepared a detailed analysis of the CEQA adequacy of the California Department of Forestry's EIR on a new management plan for the 40,000 acre Jackson State Forest. Major issues included forestry practices, water quality, and biological resources. Client: Dharma Cloud Foundation

Los Angeles Airport Arrival Enhancement Project Environmental Assessment NEPA Peer Review. Mr. Grassetti prepared a peer review and expert declarations regarding the adequacy of the NEPA Environmental Assessment for rerouting of flight paths for aircraft arriving at Los Angeles International Airport. Major issues included adequacy of assessment of noise effects on traditional cultural practices of the Morongo Band of Mission Indians. Client: Law Offices of Alexander & Karshmer.

St Mary's College High School Master Plan Peer Reviews. Mr. Grassetti conducted peer reviews of two Initial Studies for proposed expansions of a high school. Major issues included noise and traffic. Client: Peralta Park Neighborhood Association.

Lawson's Landing EIR Peer Review. Mr. Grassetti conducted detailed peer reviews of numerous CEQA documents for the proposed master plan for the Lawson's Landing mobile home park and campground in Marin County. Client: Environmental Action Committee of West Marin.

Coaches Field Initial Study Peer Review. Mr. Grassetti Conducted a peer review of a proposed lighted ballfield project in the City of Piedmont. Mr. Grassetti's review resulted in the Initial Study being withdrawn and an EIR being prepared. Client: Private Party.

Metropolitan Oakland International Airport Development Plan Environmental Impact Report CEQA Review. Mr. Grassetti performed a critical review and assisted in the preparation of comments and ultimately successful litigation regarding the proposed expansion of Metropolitan Oakland International Airport. Major issues included noise, cumulative impacts, and alternatives selection/analyses. Client: Law Office of John Shordike.

San Francisco International Airport Environmental Liaison Office Consulting. Mr. Grassetti conducted various internal peer review tasks associated with environmental studies being prepared for SFIA's proposed runway expansion. Client: LSA Associates, Inc.

El Cerrito Lumber Yard CEQA Peer Review. Mr. Grassetti conducted an internal peer review for an Initial Study on a controversial parcel in the City of El Cerrito. Client: City of El Cerrito.

Sausalito Marina CEQA Critique. Mr. Grassetti prepared a peer review and critique of an EIR for a proposed new marina in Sausalito. Client: Confidential

Sausalito Police and Fire Station CEQA Critique. Mr. Grassetti prepared a peer review and critique of an EIR for a proposed new public safety building in Sausalito. Client: Confidential

Napa Verison Tower CEQA Critique. Mr. Grassetti conducted a peer review and critique for a cellular telephone tower in the City of Napa. Client: Confidential.

Morongo Mining Projects Environmental Reviews. Mr. Grassetti provided CEQA, NEPA, and technical consulting to the Morongo Band of Mission Indians regarding two aggregate mines adjacent to their reservation in Riverside County, CA. Client: Law Office of Alexander & Karshmer.

Napa Skateboard Park Peer Review. Mr. Grassetti conducted a peer review and critique for a neighborhood association on a proposed skateboard park in the City of Napa. Client: Confidential.

Headwaters Forest Project EIR/EIS Review. Mr. Grassetti conducted an expert review of the CEQA and NEPA adequacy and technical validity of EIR/EIS on the Headwaters Forest Habitat Conservation Plan, Sustained Yield Plan, and land purchase. Clients: Environmental Law Foundation; Environmental Protection and Information Center, and Sierra Club.

Global Photon Fiber-Optic Cable EIR Peer Review. Mr. Grassetti assisted in a third-party peer review of an EIR on a proposed offshore fiber-optics cable. Client: Tetra Tech, Inc., and California State Lands Commission.

Coachella Valley Water Management Plan CEQA Peer Review. Mr. Grassetti assisted a consortium of Coachella Valley Indian Tribes in reviewing CEQA documents on the Coachella Valley Water Management Plan. Client: Consortium of Coachella Valley Tribes.

Salton Sea Enhanced Evaporation System Initial Study/Environmental Assessment Peer Review. Mr. Grassetti reviewed the draft IS/EA for a spray project to evaporate excess return flow water from the Salton Sea. Client: Morongo Band of Mission Indians.

Santa Rosa Home Depot CEQA Peer Review: Mr. Grassetti conducted a peer review and provided expert testimony regarding the adequacy of the Environmental Impact Report

and associated technical studies for a proposed Home Depot shopping center in Santa Rosa. Client: Redwood Empire Merchants Association.

Mitsubishi Mine CEQA Litigation Review. Mr. Grassetti conducted a review of legal briefs regarding the adequacy of CEQA analyses for a proposed mine expansion in San Bernardino County. Client: Law Offices of Thomas Mauriello.

Alamo Gate Permitting Review. Mr. Grassetti performed a critical review and prepared expert testimony and correspondence regarding the adequacy of CEQA and land use permitting and studies for a proposed gate on Las Trampas Road, which would preclude vehicular access to a regional park staging area. Client: Las Trampas Trails Advocates.

Cambria Condominiums Environmental and Planning Review. Mr. Grassetti prepared expert reviews of the potential environmental effects and Local Coastal Plan compliance of a proposed condominium development in Cambria, San Luis Obispo County. Client: Law Office of Vern Kalshan.

Mariposa County Planning Policy Reviews. Mr. Grassetti conducted a review of proposed alterations to the Mariposa County General Plan for CEQA compliance. Client: Dr. Barton Brown.

Gregory Canyon Landfill Environmental Processing Review. Mr. Grassetti was retained to review the environmental permitting and CEQA analyses for the proposed Gregory Canyon Landfill in northern San Diego County. Procedural issues include landfill siting requirements and CEQA process compliance. Technical issues include cultural resources, hydrology, endangered species, traffic, and health and safety. Client: Law Offices of Alexander & Karshmer and Pala Band of Mission Indians.

Otay Ranch Development CEQA Review. Mr. Grassetti prepared an expert review of the Environmental Impact Report for the 23,000-acre Otay Ranch project in San Diego County in connection with ongoing litigation. Major issues were CEQA compliance, compliance with the California planning process, biological impacts, cumulative impacts, and alternatives. Client: Law Offices of Charles Stevens Crandall.

Punta Estrella Chip Mill Environmental Report Compliance Review. Mr. Grassetti prepared a review of a proponent's environmental report for a proposed wood chip mill in Costa Rica to determine compliance of documentation with U.S. environmental standards and policies. Major compliance issues included US Clean Air Act and Clean Water Act standards, NEPA standards, and adequacy of overall impacts analysis. Client: Scientific Certification Systems.

Carroll Canyon Burn Facility CEQA Compliance Review. Mr. Grassetti prepared a CEQA process review for a proposed Negative Declaration on a planned contaminated-earth burning facility in the City of San Diego. Client: Law Offices of William Mackerzie.

Monterey Bay Marine Lab CEQA Compliance Review: Mr. Grassetti assisted attorneys in review of a CEQA Negative Declaration, NEPA Environmental Assessment, and associated

documents for the relocation of the Monterey Bay Marine Laboratory. Issues included the effectiveness of mitigation to cultural and biological resources, the appropriateness of the Negative Declaration versus an EIR, and other CEQA issues. Client: Law Offices of Alexander & Karshmer.

Monterey Ground Water Ordinances CEQA Compliance Review. Mr. Grassetti provided expert CEQA consulting services to attorneys regarding the appropriateness of Monterey County's CEQA processing of proposed ground water ordinances. Client: Salinas Valley Water Coalition.

Jamestown Whistlestop CEQA Adequacy Review. Mr. Grassetti performed an expert review and assisted in successful litigation regarding an Initial Study for a proposed mini mall in Jamestown, Tuolumne County. Client: Law Offices of Thomas Mauriello.

Sunrise Hills Environmental Impact Report Peer Review. Mr. Grassetti performed a critical review of the applicability of the EIR for a proposed 200-unit residential development in Sonora, Tuolumne County. Major issues include grading, erosion, water quality, biological impacts, and visual quality. Client: Sylva Corporation.

Sonora Crossroads Shopping Center Environmental Impact Report Review. Mr. Grassetti performed a review of an EIR for a major new shopping center in Sonora, Tuolumne County. Major issues included geologic and hydrologic impacts. Findings were presented to the Sonora City Council, and pre-litigation assistance was provided. Client: Citizens for Well Planned Development.

Blue Oaks Residential Development CEQA Studies Review and Critique. Mr. Grassetti performed several tasks related to a proposed residential development in western Tuolumne County. Tasks included review of County CEQA procedure, review of Initial Study, review of Draft EIR, and coordination with attorneys. Client: Western Tuolumne County Citizens Action Group.

Yosemite Junction Project CEQA Review. Mr. Grassetti prepared a review and critique of a proposed Negative Declaration for a 40-unit outlet mall in Tuolumne County, California. The Negative Declaration was subsequently denied and the project application rescinded. Client: Sylva Corporation.

Sonora Mining Corporation CEQA Review/Expert Witness Services. Mr. Grassetti conducted a review and critique of CEQA compliance for the proposed expansion of Sonora Mining Corporation's Jamestown Gold Mine in Tuolumne County, California. Client: Law Office of Alexander Henson.

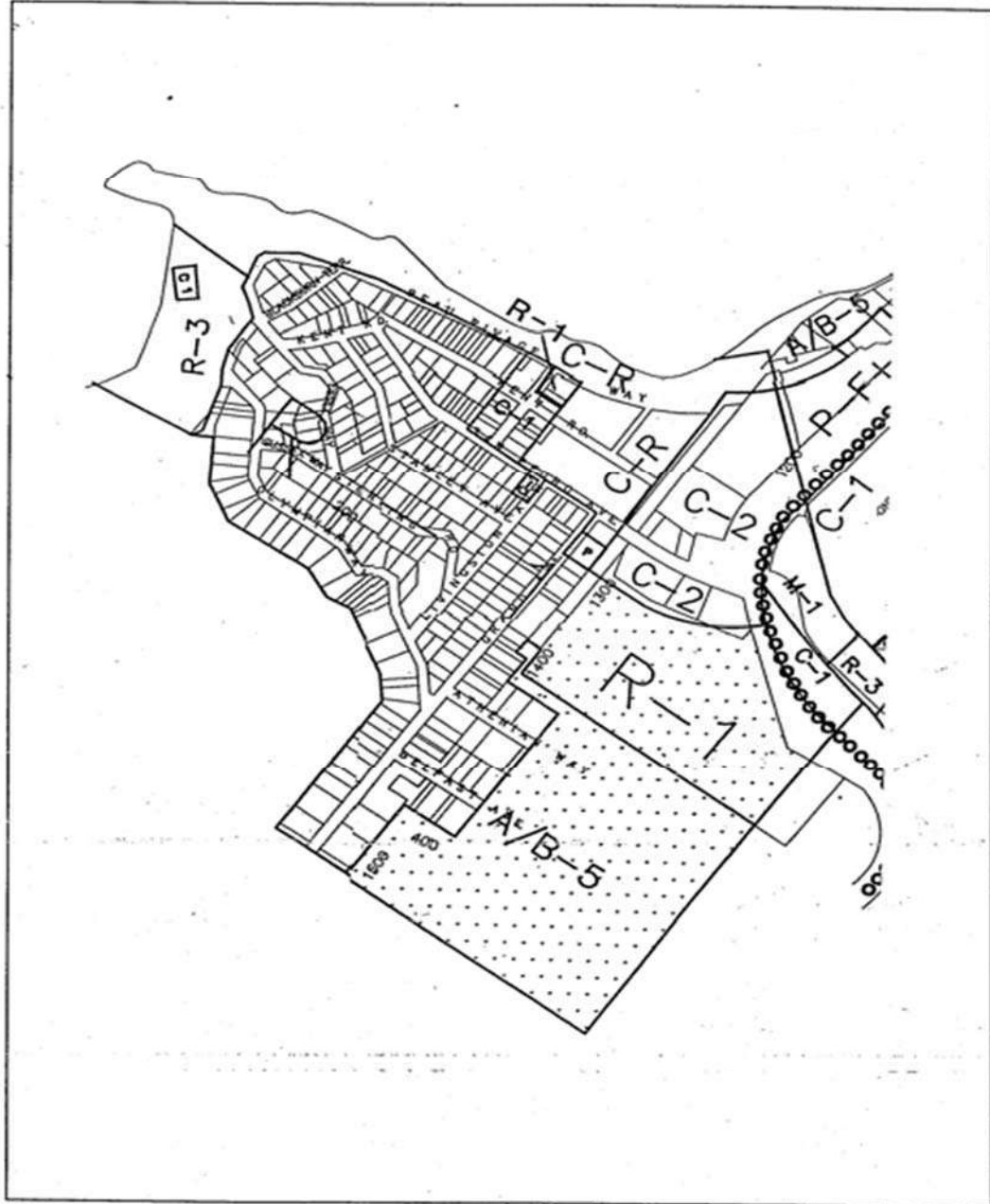
Save Our Forests and Rangelands Expert Review and Witness Services. Mr. Grassetti provided expert review, consulting services, and expert witness testimony on CEQA issues for a successful legal challenge to an EIR and Area Plan for 200,000 acres in the Central Mountain Sub-region of San Diego County. Client: Law Offices of Milberg, Weiss, Bershad, Specthrie, & Lerach.

Mr. Christian Murdoch
June 3, 2022

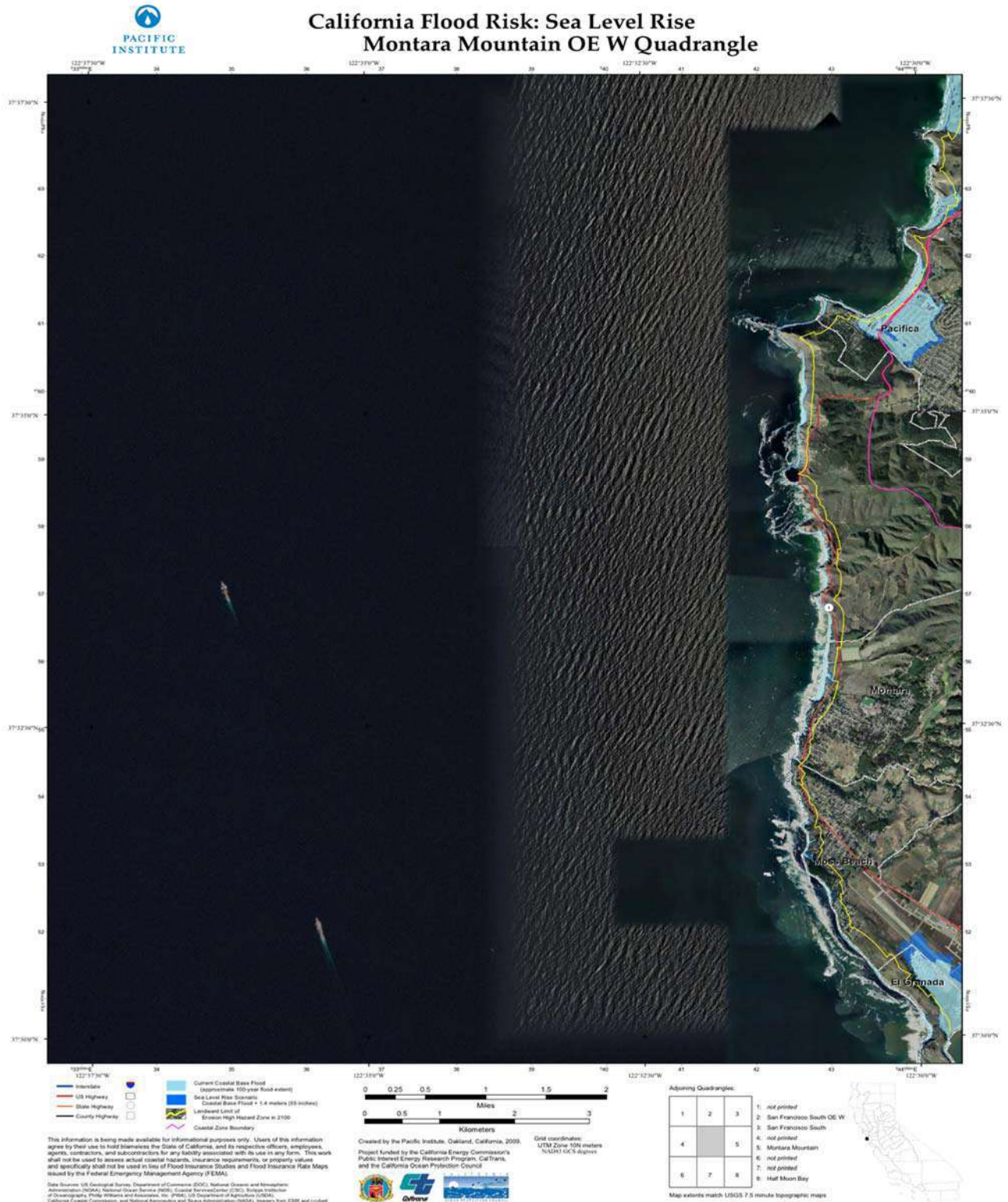
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Attachment 2: City of Pacifica Zoning Map, p. 31

Zoning Map 31



Attachment 2: Pacific Institute Sea Level Rise Map



Mr. Christian Murdoch
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Attachment 4: State of California Sea Level Rise Guidance Document

Mr. Christian Murdoch
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Attachment 5: Site Access Photographs



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MEMORANDUM

To: PEDRO POINT COMMUNITY ASSOCIATION (PPCA), attention: Joanne Gold

Cc: Brian Gaffney, Richard Grassetti

Date: March 7, 2022

SUBJECT: Draft Environmental Impact Report (DEIR) for the City of Pacifica General Plan Update (GPU) and Sharp Park Specific Plan SCH: 2020089010, January 7, 2022: Pedro Point special-status species, vegetation, and wetlands

1. Scope of review: I am providing critical review of sections of the Draft Environmental Impact Report (DEIR) for the City of Pacifica General Plan Update (GPU) and Sharp Park Specific Plan SCH: 2020089010, January 7, 2022. I am incorporating by reference and attaching my previous comments on the highly similar 2014 DEIR for the GPU. My current comments are updated with recent information about existing conditions since 2014, and address relevant sections of the DEIR that pertain to Pedro Point, with emphasis on coastal lowlands from San Pedro Creek to the Pedro Point Field bordering San Pedro Road. My review focuses on biology, ecology, and related physical environmental influences (hydrology, geomorphology) and land uses.

2. Summary of findings:

- The 2022 DEIR presents an inconsistent and inaccurate description of existing environmental conditions regarding environmentally sensitive endangered fish and wildlife species distributions, movements, and wetland habitats in the vicinity of Pedro Point.
- The substantial errors and omissions regarding existing environmental conditions, particularly occupied environmentally sensitive habitats (ESHA) of federally listed tidewater goby and California red-legged frog, and coastal seasonal and perennial wetlands connected to the mouth of San Pedro Creek, are apparently related to arbitrary conclusions that underestimate potential significant impacts that are neither identified nor mitigated.
- Programmatic mitigation measures in the GPU that claim to address endangered species and wetlands impacts are mere restatements of long-standing existing state and federal regulations and policies beyond City of Pacifica jurisdiction, and provide no additional or independent mitigation.
- The proposed GPU zoning for the Pedro Point Field is apparently inconsistent with Coastal Act policies that depend on accurate factual baseline information describing existing environmental conditions.

3. Existing Conditions and Impact Assessment: Significant Errors and Omissions

3.1. Tidewater Goby. The DEIR fails to disclose the presence of a federally listed fish that inhabits San Pedro Creek, the northern tidewater goby (*Eucyclogobius newberryi*). The DEIR impact assessment and GPU zoning proposals fail to account for potential significant indirect and cumulative impacts to the tidewater goby.

The northern tidewater goby is a small (< 6 cm total length), cryptic, annual fish that inhabits isolated lagoons, sloughs, and stream-mouth estuaries that are widely separated from each other. This federally listed species has experienced a reduction in the number of isolated estuarine sites it inhabits because of coastal development, droughts, and invasive non-native species (USFWS 2005).

Sutter (2018) used highly sensitive environmental DNA methods (eDNA) to monitor the presence or absence of an endangered tidewater goby species, the northern tidewater goby through its coastal range in California. He detected northern tidewater goby using eDNA methods at four sites where they have not previously been detected, including San Pedro Creek (Sutter and Kinziger 2019). San Pedro Creek showed a strong signal of tidewater goby presence. No recent field detection survey records based on traditional methods (seining, trapping) are available for San Pedro Creek. San Pedro Creek had previously been listed by the U.S. Fish and Wildlife Service as potential re-introduction sites in the tidewater goby recovery plan, based on presumed absence (USFWS 2005).

The DEIR existing conditions descriptions in biological resources and hydrology sections fail to account for the presence of this federally listed endangered species in San Pedro Creek. The DEIR assessments of indirect and cumulative impacts fail to account for potential significant impacts of new development near the mouth of San Pedro Creek. Potential indirect and cumulative impacts of new development on Pedro Point may occur because of hydrologic linkage between Pedro Point Field and the mouth of San Pedro Creek, where a culvert drains the swale/ditch at the east end of the field into the small estuarine lagoon at the stream mouth.

The potential impacts of tidewater goby are not dependent on the distribution of federally listed critical habitat, which is a legal designation of a sub-set of sensitive habitats for the species made after considering economic factors. Figure 3.7-3, Sensitive and Critical habitat, does not represent any potential or likely habitat of tidewater goby in San Pedro Creek, especially near the estuarine mouth, the most likely location of resident populations. This figure is incomplete, inaccurate, and misleading regarding potential significant impacts of the GPU zoning proposals to tidewater goby.

The DEIR Hydrology section at 3.5-4 states that San Pedro Creek is a key coastal watershed because it contains federally listed anadromous steelhead trout. This description of existing hydrological conditions in context of federally listed aquatic species repeats and reinforces the significant omission of the other resident federally listed non-anadromous fish species, tidewater goby (*Eucyclogobius newberryi*) that has been conclusively been determined to be present in the watershed by environmental DNA (eDNA) methods (Sutter and Kinsiger 2019).

The GPU proposes zoning changes for the Pedro Point Field that support new development. The potential impacts of proposed zoning and land use changes to the tidewater goby population were not considered in the DEIR. New development runoff could transport sediment, pesticides, surfactants (detergents from automobile washing), spilled fuels, polycyclic aromatic hydrocarbons (PAHs), fertilizer runoff, and heavy metals, and point-discharge directly to the likely primary habitat of tidewater gobies at the mouth of San Pedro Creek. Adverse impacts to water quality in the lowest (estuarine lagoon) reach of the creek could significantly adversely affect growth, survivorship, and reproduction of the population of this listed fish species. This potentially significant impact was not identified or assessed in the DEIR at all.

3.2. California red-legged frog. The California red-legged frog (*Rana draytonii*) inhabits the mouth of San Pedro Creek and neighboring wetlands and non-wetland foraging habitats. Since 2005, I have observed multiple adult California red-legged frogs basking on the banks of the roadside pool at the corner of San Pedro Avenue and the Pedro Point Field, and diving into the pool when disturbed. I first documented this locality and reported it to the U.S. Fish and Wildlife Service in 2005. This pool, which is perennial (standing water most of the year), is connected to the mouth of San Pedro Creek by a continuous wetland swale and channel, ending in culverts that discharge to the freshwater estuarine reach of San Pedro Creek. The wetland swale provides a continuous habitat movement corridor (dispersal, foraging) for adult California red-legged frogs. The pools also provide potential breeding habitat when they have standing water through at least early summer.

The main local (core) source population of the California red-legged frog is likely the restored freshwater marsh at the mouth of San Pedro Creek. In 2014, during construction of the Highway 1 bridge retrofit that required dewatering of the creek mouth and authorized capture and translocation of California red-legged frogs, I observed contract biologists capturing many dozens (total over 100) of adult California red-legged frogs from the path of excavator operations, and from wetland soil loaded in excavator buckets from marsh at the mouth of San Pedro Creek. This main population is likely to provide adult frog colonizers of intermittently available habitats along the wetland swale corridor bordering San Pedro Field.

None of these known occupied habitats is shown in Figure 3.7-3 Sensitive and Critical habitat. The map omits all occupied existing California red-legged frog wetland habitats (marsh and willow wetland) at the mouth of San Pedro Creek, as well as the known occupied wetland swale at the east end of Pedro Point field. The extensive freshwater marsh here is not even mapped as wetland habitat in the DEIR. Individually and in combination, these are highly significant and misleading omissions about existing conditions for California red-legged frog habitat and populations.

Sensitive habitats of California red-legged frogs are not limited to federally listed, legally designated “critical habitat”. In a CEQA and Coastal Act (ESHA) context, all breeding and adult habitat, including terrestrial dispersal and foraging habitats (especially where “take” of the species may occur) must be considered “sensitive” habitat. The description of existing conditions is not the same as the description of designated critical habitat, which is a federal listing (Federal Register) of lands with special legal status under the Endangered Species Act, not

factual existing conditions about habitat and species distributions relevant to impact assessment. The Figure 3.7-3 map is incorrect and misleading in representing actual sensitive species habitats, by omitting known occupied and suitable habitats that are not federally listed. As a CEQA (State) document, this omission is particularly inappropriate for a state-listed wildlife species.

The habitat of California red-legged frogs is not limited to aquatic breeding habitat or perennial freshwater marsh, but includes nearby coastal terrestrial habitats that produce prey, regardless of habitat quality or cover. Nocturnal foraging of adult red-legged frogs occurs terrestrial, non-breeding habitats in moist, coastal climates. Telemetry study of California red-legged frogs on the Central coast has shown that 66% of female and 25% of male frogs moved 150 m (median; up to 1400 m) to nonbreeding terrestrial areas for foraging, even when the breeding site retained water. (Fellers and Kleeman 2007). Research findings of Fellers and Kleeman (2007) and Bulger *et al.* (2003) indicate that terrestrial habitats of California red-legged frog migration corridors do not have to be high quality or “pristine” riparian or upland habitats (e.g., overland nocturnal foraging habitat of California red-legged frogs includes “degraded” closely grazed fields, plowed agricultural land, etc.).

The zoning proposals of the GPU fail to account for the California red-legged frog ESHA (Coastal Act) of the wetland swale and adjacent lowland grassland of Pedro Point Field. General, programmatic mitigation measures are inadequate, because they do not consider existing conditions of the species habitat and movements in the vicinity of San Pedro Creek and ecologically and hydrologically connected wetlands and adjacent lowlands.

3.3. Vegetation. The description of existing conditions for vegetation in the DEIR is inaccurate and misleading with regard to the distribution of northern coastal scrub, grasslands, and wetlands.

Figure 3.7-1 vegetation classification map represents the Pedro Point Field location color-code mapped as “northern coastal scrub”. In fact, none of the dominant or associated plant species enumerated as northern coastal scrub species indicators in the DEIR occur in the Pedro Point field, which is dominated by herbaceous (not scrub) lowland non-native grassland species, and a minority of seasonal wetland plants occurring in poorly drained flats. The vegetation map representing the distinct polygon over Pedro Point field is incorrect, completely misrepresents existing conditions for vegetation.

The vegetation map of Figure 3.7-1 also omits the distinct perennial wetland swale (drainage trough containing native and nonnative marsh vegetation) at the east end of the field, which is significant as ESHA (environmentally sensitive habitat area) in itself, independent from its ESHA status as likely terrestrial foraging and migration habitat for federally listed California red-legged frogs.

The DEIR description of “wetlands” in Pacifica (3.7-10) does not accurately reflect any of the dominant wetland vegetation types that exist at the mouth of San Pedro Creek freshwater marshes and riparian areas, or the Pedro Point Field, though the depressional freshwater wetlands at the north end of Pacifica State Beach are described. The extensive perennial

freshwater and estuarine-influenced restored marsh at the mouth of San Pedro Creek, which is known to support a large population of federally listed California red-legged frogs and many wetland wildlife species (including garter snakes, subspecies undetermined; Great blue herons, Great Egrets, breeding red-winged blackbirds, dabbling ducks, etc.) is not represented in the DEIR as a wetland, let alone an important one. The description of wetland existing conditions here is significantly erroneous and misleading.

The DEIR also fails to represent the wetland riparian corridor (willow scrub to sedge marsh and smartweed marsh) along the drainage swale connecting the culvert at San Pedro Creek to the east end of the Pedro Point Field along the eucalyptus grove, an area where the DEIR does propose a change in land use and zoning. Inexplicably, as the DEIR arbitrarily omits the important freshwater wetland complex of San Pedro Creek mouth and connected, adjacent lowlands, it emphasizes freshwater wetlands at the north end of Pacifica State Beach, where there is no proposed zoning change to analyze. This arbitrary inversion of DEIR focus, coupled with significant omissions of existing important wetlands of the San Pedro creek mouth complex, is profoundly misleading, and makes meaningful public comment impossible.

The DEIR treats erroneously classifies all grassland vegetation in Pacifica as “annual grasslands”, and describes “annual grassland” composition only in terms of dominant non-native herbaceous species of hillslope (foothill) grasslands, regardless of ecologically significant components of native perennial or annual plant species, or lowland (valley, alluvial) topography, soils, hydrology and drainage. Pacifica grasslands in fact include coastal prairie with subdominant to dominant (seasonally variable) native perennial and annual herbaceous vegetation, such as that of Rockaway Head and Pedro Point headlands.

At Pedro Point Field, the dominant vegetation is lowland valley grassland with significant local patches of native and non-native seasonal wetland vegetation. Pedro Point Field is seasonally saturated and flooded (intermittently during droughts), and has supported persistent inconspicuous (small and identifiable only in moist spring conditions) remnant populations of native wetland species including *Triglochin scilloides* (*Lilaea scilloides*; flowering-quillwort), *Juncus bufonius* complex (variety undetermined; toad rush), and (rarely) *Cicendia quadrangularis* (Oregon timwort) despite dominance in most seasons by introduced ryegrass (*Festuca perenne*, syn. *Lolium perenne*) and Mediterranean non-native annual grasses. The omission of the lowland, alluvial seasonal wetland character of the poorly drained valley grassland flats in the field, combined with their map misrepresentation as coastal scrub, and the general identification of all grasslands in Pacifica as non-native annual hillslope grasslands, is inaccurate and misleading as a description of existing conditions with potential significant impacts at stake for proposed zoning changes.

Other figures in the DEIR exacerbate the ecological misrepresentation of existing conditions for vegetation and habitats at the Pedro Point Field. Figure 2.1-2: General Plan Land Use represents “paper” non-existent streets through the Pedro Point Field lowland grassland, misrepresenting “existing conditions” as more developed with road infrastructure than actual existing conditions, and an expression of the novel zoning designation, “Coastal Residential Mixed Use”. Figure 3.6-3: Slope Failure and Coastal Erosion shows the field separated from the ocean directly behind a

shoreline marked “critical coastal erosion”, and “Severe Beach & Cliff Erosion” (potential tsunami, coastal flooding and erosion hazard). See 3.6-17, “bluffs...projected to have eroded by 23-24 m by 2050”. Figure 3.6-1: Seismic Hazard Zones shows the whole field as “Liquefaction zone”, in contrast with adjacent residential slopes, reflecting the siting of the field on deep alluvium of historic marsh and swamp. Figure 3.5-1 Hydrology and flood zones, shows the entire field mapped as “tsunami flood evacuation zone”. The context for existing conditions and future potential land uses of the field and its existing habitats should be made clear, combined with the indirect effects of accelerated sea level rise on flooding and groundwater elevations within the time-horizon of the GPU, in context of proposed zoning changes.

Groundwater elevations rise with rising sea levels, and coastal flooding risks during extreme rainfall events must increase as the base level of drainage (at the culvert connection to San Pedro Creek, relative to storm wave runup elevation) increases. This is pointedly relevant to the assessment of cumulative impacts to seasonal and perennial wetland habitats of Pedro Point Field and zoning changes, but it is not analyzed or disclosed at all in the DEIR. As flooding and groundwater levels increase with sea level rise, ESHA wetland habitats are likely to expand naturally, or set up conflicts with new development requiring increased flood protection, surface drainage, and sub-drainage (groundwater pumping that dewateres wetlands) in ESHA. The DEIR does not analyze this impact and policy conflict in terms of Coastal Act Section 30240 Environmentally sensitive habitat areas (ESHA); adjacent developments, which states:

- (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.

4. Programmatic mitigation is vague and ineffective for wetlands, ESHA and sea level rise.

Programmatic mitigation measures related to ESHA, wetlands, and special-status species are vague and redundant re-descriptions of existing state and Federal regulations or policies that provide no meaningful additional mitigation to potential significant impacts of proposed GPU actions, including location-specific zoning proposals for Pedro Point. For example, CO-1-4, “wetland preservation” establishes a meaningless and incomplete prohibition that establishes an exception that swallows the rule, allowing any wetland development that is permitted by the Corps of Engineers (Clean Water Act Section 404) and Coastal Commission (Coastal Act). The Corps has no history of permit denial in Pacifica or San Mateo County, and the Coastal Commission has (a) limited geographic jurisdiction in Pacifica seaward of the first ridge, and (b) a history of “emergency” authorizations for coastal erosion that bypasses policies, including ESHA. The DEIR fails to explain any evidence or analysis demonstrating how this policy could possibly provide any substantive mitigation or protection to Pacifica wetlands in conflict with development. Similarly, impermissibly vague policy CO-I-7, “Maintain Functional Capacity of

Wetlands, Ensure that any diking, filling, or dredging in existing wetlands maintains or enhances their functional capacity” provides no substantive criteria to make it enforceable.

Similarly, policy SA-G-5, “Sea Level Rise and Best Available Science. Planning and development reviews shall use, as applicable, the best available science about projected sea level rise and other climate change-related environmental changes when addressing coastal erosion, bluff failure, flooding, and other coastal hazards” is a vague exhortation with no substantive procedures or criteria that apply to any location-specific proposed zoning changes, such as CRMU for Pedro Point Field. In fact, the DEIR does not even refer to sea level rise and related indirect hydrologic changes (flooding and groundwater elevations), or apply this vague policy, in considering zoning for Pedro Point Field.

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ATTACHMENT

July 2014 comments on Pacifica General Plan Update Project, SCH No. No. #2012022046

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July 7, 2014

SUBJECT: Draft Environmental Impact Report for The Pacifica General Plan Update Project – SCH No. No. #2012022046

Dear Mr. Diaz,

The comments below regarding the Draft Environmental Impact Report for the Pacifica General Plan Update Project (DEIR) are submitted on behalf of the **Pedro Point Community Association**, but represent my independent, best professional judgment.

I have reviewed the DEIR sections relevant to assessment of biological resources, land use policies, and selected relevant portions covering hydrology and geology for CEQA compliance and for LCP amendment compliance with the Coastal Act. I have also conducted site visits of the Pedro Point field (also “undeveloped San Pedro Ave site” and described as “vacant” in the DEIR, General Plan and Local Coastal Plan documents) in all seasons since 2000.

My qualifications to provide expert comments are based on nearly 35 years of professional work in coastal wetland and terrestrial ecology, with over 20 years in San Francisco Estuary wetlands, including long-term direct knowledge of the estuarine wetlands, special-status species, and diked baylands in the project area. A statement of my qualifications is attached hereto as Attachment A.

My comments focus on the potentially adverse environmental impacts of proposed changes in the land use designation of the Pedro Point neighborhood.

Summary of Comments

1. Environmental Baseline: The DEIR provides contradictory information about the vegetation of the Pedro Point field, asserting that it supports “northern coastal scrub”, an upland vegetation

type absent in the grassy field, and that it supports wetlands. The field supports seasonal wetlands. The DEIR fails to disclose the importance of these wetlands in terms of the environmental setting of San Pedro Creek mouth wetlands in the Coastal Zone (the field is the last remaining historical floodplain of the lower San Pedro Creek Valley that has not been developed in the Coastal Zone) and the local distribution of ESHA (Environmentally Sensitive Habitat Areas) supporting California red-legged frogs.

2. Biological Impacts to Wetlands and Special-status Species: The DEIR fails to analyze any biological impacts caused by conversion of the existing Pedro Point field to a land use designation of “Coastal Residential Mixed Use development”. The DEIR fails to programmatically assess impacts at a neighborhood-specific level as it did in the 1980 General Plan, and it fails to consider general impacts of residential development on extensive seasonal wetlands and ESHA in and around the field. The proposed land use change for the field is likely to cause significant impacts to wetlands, wildlife, and special-status species for which no feasible mitigation has been identified, and for which no feasible mitigation probably exists.

3. Land Use Impacts. The DEIR fails to analyze land use impacts caused by changing the land use of the field from a general “Commercial” use (1980 General Plan) to a more specific and different “Coastal Residential Mixed Use” designation. This change for the field’s designated land use causes significant impacts (conflicts with) to the City’s own land use policies and numerous Coastal Commission land use policies that cannot be mitigated, and are not mitigated by the vague, programmatic mitigation measures cited in the DEIR.

4. Conclusion. The DEIR fails to disclose important biological resources, and their distribution and relationship to other biological resources and communities in the environmental setting of lower San Pedro Creek. This precludes meaningful public comment and DEIR analysis of significant impacts to biological resources and land use policies that are likely to occur. The DEIR should be recirculated to correct the flawed environmental baseline and defective impact analysis, and should identify reasonable alternatives that either lessen significant impacts, or are otherwise environmentally preferable.

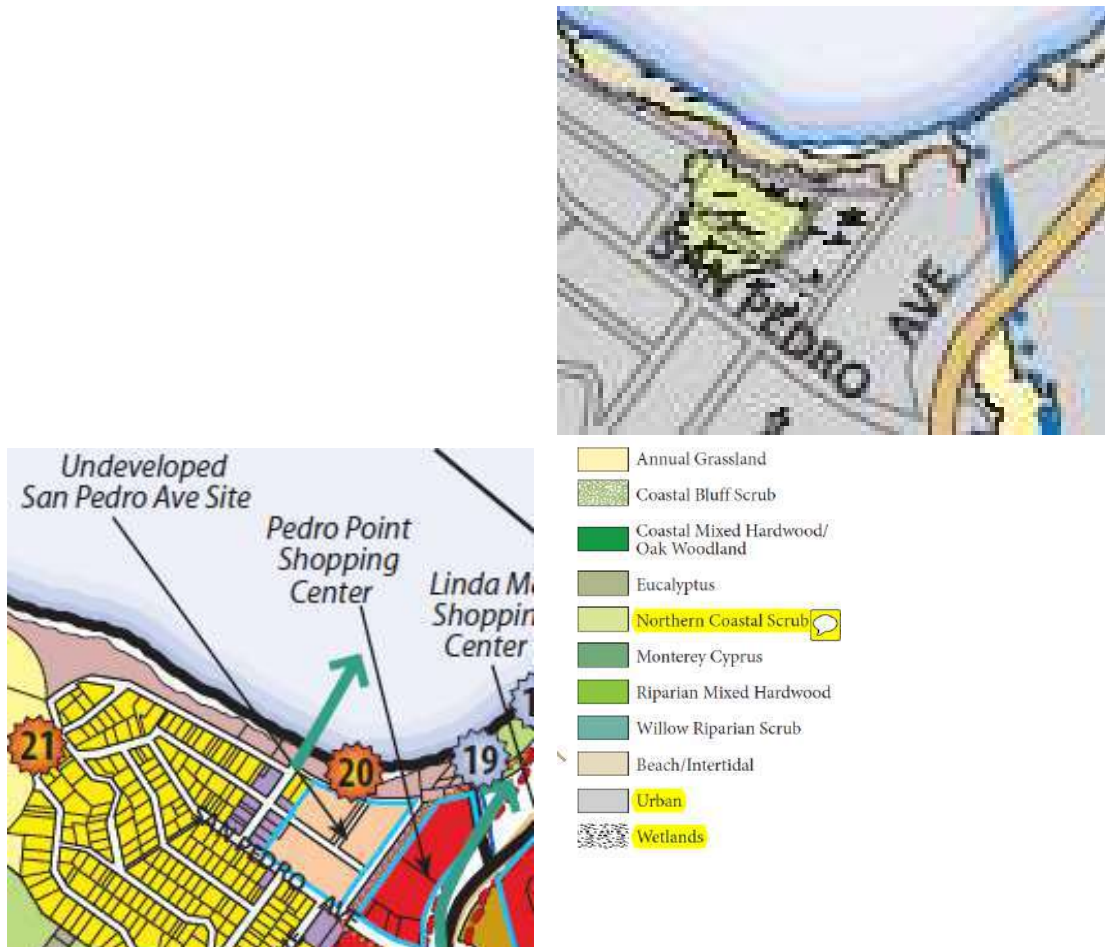
1. Environmental Baseline

The DEIR presents inconsistent and erroneous biological baseline description of the existing conditions of the Pedro Point field and its vicinity. The errors, omissions, and contradictory environmental baseline description results in erroneous conclusions that the project (General Plan) will have no significant biological impacts. Neighborhood-specific assessments of proposed General Plan land use changes are lacking for Pedro Point, its field, and for the DEIR in general.

Assessment of biological and land use impacts to the Pedro Point neighborhood requires reference to existing *physical and biological* environmental conditions (2014; approximately the time of the EIR’s notice of preparation), and the existing *land use* designations from the 1980 General Plan. The existing biological conditions of the Pedro Point field – the last undeveloped lowland open space within the historical floodplain of San Pedro Creek – is inaccurately and inconsistently represented in the DEIR’s figures and text. These errors result in underestimation of significant biological impacts, as discussed below.

1.1 Mapped DEIR Wetlands, Vegetation and Habitats – physical and biological baseline

The DEIR provides contradictory and confused (and confusing) information about the existing biological conditions of the Pedro Point field. Figure 3.7-1 (Vegetation; DEIR p. 3.7-3) maps most of the field in the color-code (pale olive green) corresponding with “Northern Coastal Scrub” (an upland vegetation type associated with coastal hillslopes and bluffs), and part of the field color-coded gray as “urban” land use but overlapping with the “wetlands” symbol. This is contradictory and erroneous environmental baseline information. There are in fact *no stands of northern coastal scrub vegetation* at all within or around the Pedro Point field. The shrubs on the railroad berm are ornamental non-native plantings. No part of the field is “urban” cover type, as misrepresented in the figure; *no paved or developed areas with structures exist in the field*. Figure 3.1-1 shows the “Existing land use” color-coded gray as “Vacant/Undeveloped”, which is also inconsistent with “urban” land use, but consistent with “wetlands”. The map also misrepresents mixed ornamental, non-native, and native coastal bluff scrub vegetation northwest of the field as “beach/intertidal” habitat. The two major color-coded map units for the Pedro Point field, “urban” and “northern coastal scrub” are incorrect.



Excerpted section of Figure 3.7-1 of the DEIR “Vegetation” map (above) showing Pedro Point field with paper streets between Dannman and San Pedro Ave. The setting within the Draft Local Coastal Plan (2014) as represented as “Undeveloped San Pedro Ave Site”, is shown in a portion of Figure 4.8 (left).

Only one map symbol (pattern) for the vacant/undeveloped Pedro Point field in Figure 3.7-1 is accurate: “wetlands” classified by the U.S. Fish and Wildlife Service National Wetlands Inventory at coarse scale, as shown also in DEIR figure 3.7-2. The Pedro Point field itself is dominated by non-native grasses and herbaceous broadleaf plants, including seasonal wetland and non-wetland vegetation. Both maps omit the distinct seasonal and perennial wetlands of the drainage swale at the east end of the field, which drain to San Pedro Creek through a series of culverts. The drainage swale wetlands, the wetland connectivity to San Pedro Creek mouth, and the extensive perennial wetlands (Freshwater Marsh) of San Pedro Creek are entirely missing from the vegetation map of Figure 3.7-1.

Other errors describing habitat and vegetation are evident in the DEIR’s descriptions of existing conditions in the coastal zone. For example, the DEIR confuses coastal strand (beaches and dunes) with coastal bluff scrub, and states that the plant sea-rocket (*Cakile maritima*) is a dominant species of “coastal bluff scrub”. Sea-rocket is a non-native species common on sand beaches and low foredunes (like those of Pacifica State Beach), but does not occur at all in coastal bluff scrub in Pacifica or elsewhere, let alone as a dominant species. The description of coastal bluff scrub combines species that simply do not occur together in natural or disturbed environments of Pacifica.

1.2. Wetland classification of the Pedro Point field and vicinity: existing conditions

Based on my recent and past site visits, I know that the existing vegetation of the Pedro Point field consists of predominantly annual and perennial, herbaceous, non-native seasonal wetland and upland grassland vegetation. Seasonal wetland grassland occupies a mosaic of depressions, ditches, and swales. Mesic grassland (seasonally wet but lacking a prevalence of wetland indicator plants) occupies portions of the higher elevation zones of the site, primarily to the southwest corner. The wetland depressions are indicated by seasonally high density of toad rush (*Juncus bufonius*, FACW, facultative-wet indicator in arid west), co-occurring with European ryegrass (*Festuca perenne*; syn. *Lolium perenne*; FAC, facultative wetland indicator in arid west) and buck’s-horn plantain (*Plantago coronopus*; FACW, facultative-wet indicator in arid west). Some of the wettest depressions support populations of *Lilaea scilloides* (flowering quillwort). Flowering quillwort is evident only in the wettest years when pools stay flooded for many weeks or months. Accurate wetland plant identification and measurement of the seasonal wetland patches at this site are possible only during winter to spring months. Desiccation, disturbance (trampling, mowing, discing) eliminates or degrades wetland vegetation and precludes accurate

identification in fall and summer. Similarly, accurate assessment of wetland hydrology is feasible only during the rainy season, during and within two weeks following major rainfall events.

The USFWS classification of Pedro Point Field wetlands shows wetlands distributed over approximately all of the site, as shown in DEIR Figures 3.7-1 and 3.7-2. Past and current National Wetland Inventory (“NWI”) maps consistently apply wetland classifications to approximately all of the field. Two current classifications of the field’s wetlands include the codes “PEMah” and “PUSCh”, both “palustrine” (freshwater emergent, non-tidal) seasonal, and consistent with the seasonally flooded hydrology associated with surrounding berms. The “U” (unconsolidated shore) probably is associated with intermittent unvegetated (disced, vegetation disturbed) conditions. The NWI wetland mapping of the field broad-brush treatment of prevailing past wetland distribution, but the precision of the NWI wetland *type* boundaries is not precise enough for the DEIR to represent as “existing conditions” in 2014 CEQA assessment. In my professional opinion, “wetlands” meeting the jurisdictional criteria for Coastal Commission (“Commission”) policies, and classification as “wetland” under the Cowardin (U.S. Fish and Wildlife Service, USFWS) system, are in fact present and widely distributed over the Pedro Point field today, despite past unauthorized ditching and drainage activities (see wetland history, below).

Despite DEIR’s inclusion of NWI mapped wetlands in some figures, the DEIR fails to apply the NWI wetland mapping and classification (as well any current field reconnaissance observations to update or verify them) to any meaningful biological assessment of potential wetland impacts of land use designation changes to the field, and assessment of alternatives. The DEIR fails to assess the extent and distribution of the field’s seasonal wetlands (meeting Cowardin/California Coastal Commission wetland criteria) in relation to land use changes proposed. The DEIR does not consider the accuracy or distribution of the (old) NWI wetland maps based on existing field conditions. Specifically, the DEIR does not analyze whether the field’s wetlands are localized or extensively distributed in the field, so it cannot analyze whether it is even feasible to designate a coastal residential mixed-use development without committing the City’s General Plan to significant wetland impacts, in conflict with its own land use policies and Coastal Act policies.

Further, because of the DEIR’s omissions about wetland impacts, comparison of alternatives will lack relevant information about feasible land use alternatives that may avoid or minimize wetland impacts, and which may be environmentally preferable. Examples of environmentally preferable alternatives consistent with City and Coastal Act policies include existing “Commercial” land use (with and without “Commercial-Recreation” zoning) compatible with low-intensity visitor-serving commercial recreation/tourism-promoting uses; or “Conservation” - all of which are consistent with City policies for tourism destination, avoidance of natural hazards, wetland conservation, and consistency with recreational, scenic values that Coastal Act policies give priority over residential development.

1.3. Wetland jurisdiction and CEQA

The DEIR cites multiple state and federal wetland jurisdictions. With respect to assessment of *biological* impacts to wetlands, USFWS (NWI, Cowardin wetland classification), California Coastal Act, and California Department of Fish and Wildlife wetland policy definitions are

applicable because these are fundamentally based on habitat, hydrogeomorphic features, and ecological functions. In contrast the narrowest federal definition (U.S. Army Corps of Engineers and Environmental Protection Agency; USACE/EPA) under the Clean Water Act is specifically limited to *legal* wetland definition for jurisdiction over authorization of discharges of earthen fill regulated under Section 404 of the Clean Water Act. The USACE/EPA wetland definition contains federal exemptions and policy disclaimers that are not relevant to biological impact assessment under CEQA, and it is a narrower and more exclusive definition that is likely to underestimate the extent of habitat-based or hydrogeomorphic definitions appropriate for impact assessment.

The California Coastal Act Section 30231 defines a wetland as:

...lands within the coastal zone which may be covered periodically or permanently with shallow water and include saltwater marshes, freshwater marshes, open or closed brackish water marshes, swamps, mudflats, and fens.

Similarly, the Cowardin (USFWS, NWI) wetland classification uses a general broad definition of wetlands:

Wetlands are lands transitional between terrestrial and aquatic systems where the water table is usually at or near the surface or the land is covered by shallow water.

California Coastal Act jurisdictional wetlands criteria in the California Code of Regulations at 14 CCR Section 13577 establish a “one-parameter definition” that only requires evidence of a single wetland parameter to establish wetland conditions, in contrast with federal wetlands criteria under the Clean Water Act:

Wetland shall be defined as land where the water table is at, near, or above the land surface long enough to promote the formation of hydric soils or to support the growth of hydrophytes, and shall also include those types of wetlands where vegetation is lacking and soil is poorly developed or absent as a result of frequent and drastic fluctuations of surface water levels, wave action, water flow, turbidity or high concentrations of salts...

The Commission’s one-parameter definition is similar to the USFWS wetlands criteria, which state that wetlands must have one or more of the following three attributes:

(1) at least periodically the land supports predominantly hydrophytes; (2) the substrate is predominantly undrained hydric soil; and (3) the substrate is nonsoil and is saturated with water or covered by shallow water at some time during the growing season of each year.

In contrast, the U.S. Army Corps of Engineers (USACE) and the Environmental Protection Agency use a three parameter definition for delineating wetlands under Clean Water Act jurisdiction, which is relevant *only in context of USACE permit authorization for discharges of fill in jurisdictional waters* of the United States. The USACE definition is narrower than those of the Coastal Commission (relevant to LCP) and USFWS (relevant to wetland impact assessment under CEQA, not limited to fill discharges and subject to federal exemptions irrelevant to CEQA).

The City's wetland policies (Land Use; DEIR p. 3.1-21) cite both USACE/EPA and Coastal Commission wetland definitions. CO-I-5, CO-I-6 cites both, and CO-I-8 cites State (CDFW/CCC) wetlands only. The narrower USACE/EPA definition is relevant only to those land use policy elements that specifically cite it in context of wetland fill permits. **The USACE/EPA jurisdictional wetlands are not the proper standard for determining consistency of GPU consistency with Coastal Act wetlands policies, or wetland impacts under CEQA.** This should be corrected in the EIR, or else the EIR will not provide accurate conclusions about Pedro Point field land use impacts regarding wetlands in context of CEQA or Coastal Act policies.

1.4. Special-status species and Environmentally Sensitive Habitat Areas (ESHA): California red-legged frogs (*Rana draytonii*) environmental baseline

California red-legged frogs (*Rana draytonii*; CRLF) occur in the freshwater marsh drainage swale bordering the Pedro Point Field along its eastern edge. I reported their presence to the U.S. Fish and Wildlife Service Sacramento Fish and Wildlife Office, Endangered Species Program in 2005. If the DEIR preparers had consulted properly with state and federal wildlife agencies, or local residents, about the local distribution of special-status or other wildlife species, this information would have been available to include in the DEIR. The DEIR, however, failed to disclose the local sub-population of CRLF in the drainage swale bordering the field, and its relationship with the population of the lower San Pedro Creek wetland complex.

I have observed adult red-legged frogs are most often observable basking along muddy or prostrate grass banks near the culverts draining San Pedro Avenue at the southeast corner of the field. The perennial moisture in this swale provides year-round hydration habitat for CRLF, as well as foraging and potential breeding habitat. CRLF breeding is indicated by intermittent local population increases in red-legged frogs here, most notably in 2010. Foraging activities of CRLF likely extend to adjacent non-wetland flats (rich in invertebrate prey) in the field during moist, foggy nighttime and early morning conditions. I am not aware of protocol nighttime surveys for California red-legged frog conducted either in the freshwater marsh swale adjacent to the field, or in the field itself. The vicinity of the freshwater marsh swale and field are a complex of foraging, basking, dispersal, and breeding wetland and upland habitat for California red-legged frogs. It thus also meets criteria for Environmentally Sensitive Habitat Areas (ESHA) under California Coastal Commission regulations. The DEIR fails to include this information about CRLF at and in proximity to the field.

In addition, the DEIR fails to analyze the potential adverse, significant impacts to CRLF from the proposed land use changes. Land use designations that would foreseeably increase the intensity of land use, such as the proposed redesignation to allow residential development or other substantial increases in the built environment, may have significant direct and indirect impacts on CRLF. The proposed residential mixed-use development of the field would likely (a) substantially reduce available nocturnal foraging habitat for CRLF (food and prey base impacts to growth and survival); (b) increase contaminant loads in the drainage swale due to runoff from driveways, roads, and backyard sources of pesticides, petroleum hydrocarbons, solvents, and detergents (reproductive impacts); (c) increase peak flow velocities in the swale during major storm runoff events (juvenile mortality impacts).

Not only has the DEIR not assessed such impacts, it has not identified feasible programmatic mitigation measures. Feasible mitigation for ESHA/California red-legged frog habitat and frog populations must include measures to (a) avoid and minimize “take” of individual frogs, (b) avoid and minimize impacts to CRLF habitat; and (c) provide adequate buffer zones to minimize adverse effects of incompatible adjacent land uses. The spatial structure of CRLF mitigation aligned with the freshwater marsh swale bordering the field may substantially constrain the feasibility of some incompatible land use designations, especially any that increase runoff, contaminants or pesticides, predator pressure on CRLF, or reduce the extent or quality of potential productive nighttime foraging habitat. The Bolsa Chica court decision [Bolsa Chica Land Trust v. Superior Court 71 Cal. Ap.4th 493, 507] confirmed that the Coastal Act requires that ESHA be avoided and buffered from development impacts and that providing compensatory mitigation alone is insufficient as ESHA mitigation.



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

1.5. Wetland context and cumulative impacts: environmental setting of Pedro Point

The DEIR also omisrepresents the existing *environmental setting and context* of the wetlands of the Pedro Point field. The field’s wetlands are represented as completely *isolated* from any other significant wetlands or potential wetland-dependent endangered species habitats. See Figures 3.1-1, 3.7-1, 3.7-2, and 3.7-3, all of which fail to show the San Pedro Creek mouth wetlands and their riparian wetland habitat, vegetation and hydrological connections with Pedro Point field and its wetlands. The San Pedro Creek stream mouth wetlands, however, are shown as red-legged frog habitat (marsh, creek, and riparian vegetation) in Figure 3.7-1, but *without* their wetland connections to the Pedro Point field and drainage swale wetlands. The omission of the San Pedro Creek mouth wetlands in the Coastal Zone is either arbitrarily selective or at least inconsistent in

the DEIR: the riparian corridor and wetlands upstream of Highway 1, outside the coastal zone, are represented in Figure 3.7-1 and 3.7-4, but not in Figure 3.7-2.

This error of selective omission of wetlands in the project vicinity appears to be due to the DEIR's failure to critically interpret and update National Wetlands Inventory map with even cursory examination of readily available current aerial or satellite imagery of San Pedro Creek mouth (e.g., Google Earth), or field reconnaissance surveys of the conspicuous restored freshwater marsh there. Figure 3.7-2, "National Wetlands Inventory Wetlands", completely fails to represent the perennial freshwater emergent marsh and freshwater streams of San Pedro Creek mouth as they existed at the time of the DEIR's notice of preparation, and as they have existed for about a decade. The DEIR cannot uncritically transfer NWI map data without checking for errors of omission due to outdated data layers. The NWI wetland classification (Cowardin USFWS classification system) provides sufficient clear wetland criteria to identify the obvious wetlands (cattail and tule marsh vegetation 6 to over 10 feet tall with standing water) at the mouth of San Pedro Creek. This marsh is clearly known to the City of Pacifica, which was the local partner in the project that restored it.

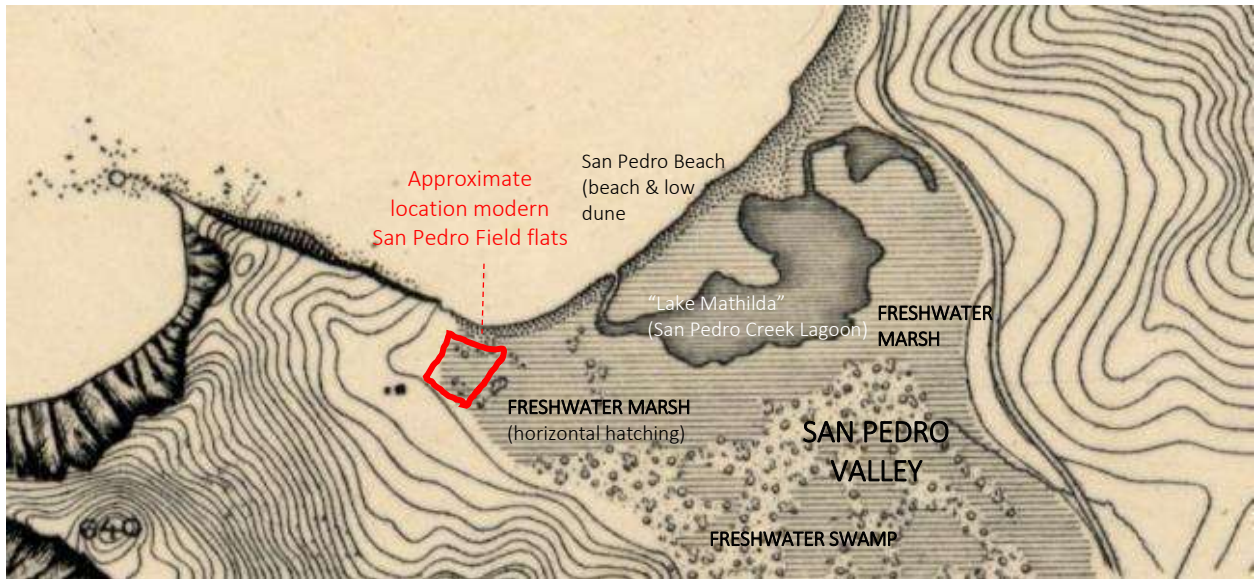
The adjacent San Pedro Creek mouth freshwater marsh is very significant as an environmental setting of the seasonal wetlands of the Pedro Point field. Ecological connectivity (wildlife corridors for wetland-dependent wildlife) exists between the creek mouth marsh and the field, provided by the drainage swale wetlands (not currently channelized; infilled with sediment and wetland vegetation) consisting of willow swamp (riparian scrub) and freshwater marsh dominated by broadleaf wetland forbs and grasses.

The environmental setting and potential Project and cumulative impacts to wetlands at the Pedro Point field are related to their hydrogeomorphic setting and historical origins and development. The pre-agricultural "natural" condition of the field was freshwater nontidal marsh within the floodplain of San Pedro Creek (San Pedro Valley lowlands). The modern field was part of complex of freshwater marsh and swamp (alder-willow) surrounding Lake Mathilda (the freshwater lagoon outlet of San Pedro Creek prior to channelization), behind the barrier beach (San Pedro Beach). The rich organic fine-grained alluvial soils were converted to agricultural cropland (artichoke fields) by draining and ditching in the late 19th century. The field apparently persisted with either low-intensity agricultural use (grazing, haying) into the 1950s or early 1960s when Linda Mar was extensively developed. Some fill was placed on at least portions of the field in recent decades, but differential subsidence in the flat to very gently sloping (<2%) field maintained depressional microtopography (shallow swales, pools) to the present day.

I have observed the Pedro Point field since the year 2000 in all seasons. Wet (saturated to seasonally flooded) depressions in the field persisted for weeks to months, supporting typical seasonal wetlands grasslands dominated by ryegrass, toad rush, buck's-horn plantain in winter-spring months. In addition, a regionally rare vernal pool/pond plant, the flowering quillwort (*Lilaea scilloides*) occurred in local abundance in several pools. In January, 2006, the current landowner and assistants manually excavated diagonal ditches and side-cast fill (ditch spoils) across the field, apparently with the intent of draining the field. In August 2006, mechanical equipment breached wide gaps in the berm between the field and the adjacent drainage swale

marsh. These drainage activities were apparently completed without benefit of a Coastal Development Permit or authorization from the U.S. Army Corps of Engineers.

Despite the 2006 drainage ditching and subsequent maintenance and repeated disking of the field, depressional wetlands have persisted and re-emerged (due in part to differential settlement and choking of ditches) in the field. The ditching appears to have reduced the duration and extent of wetland hydrology, but significant wetland areas remain widely distributed across most of the field, including the original seasonal wetland plant community.



Excerpt of U.S. Coast Survey map of San Francisco Peninsula, 1869, based on 1850s topography: San Pedro Creek Valley and beach, now Linda Mar. Approximate location of San Pedro Field (Calson/former Archdiocese property) in red shows the relationship of the modern field wetlands to the historical valley floodplain wetland complex. Parallel horizontal hatched lines indicate freshwater marsh. Stippled shoreline area indicates sandy beach, dune, washover. Fine horizontal hatching is open freshwater (Lake Mathilda; historical Pedro Creek Lagoon, drained for agriculture 19th century). Irregular circles/dots within marsh = wooded freshwater swamp (alder, willow). No scale.



Extensive seasonal flooding of the Pedro Point Field during the transition between the historical agricultural era (derelict or low-intensity agricultural use) and suburban development of Linda Mar in San Pedro Valley lowlands (background), likely 1950s-early 1960s. View to E/SE. The eucalyptus and

Monterey cypress trees at the fenceline correspond the mature trees present today along the drainage swale at the east end of the field. The extensive seasonal pond likely represents flooding patterns prior to partial filling of the wetlands.



Flooding patterns delineate undrained depressions of shallow open water in a matrix of saturated soils in San Pedro Field following heavy rainfall. December 26, 2005. View to N.



Shorebirds (likely sanderlings) forage in the seasonally saturated and flooded field during high tide and storm wave conditions that restrict foraging habitat availability on the adjacent San Pedro (Pacifica State) Beach. December 27, 2005, prior to unauthorized ditching of the field. Red-necked phalaropes also forage in the saturated to flooded field during winter storms.



January 19, 2006. Manual excavation of drainage ditches in flooded field at the east end of the field. Grass grows above water surface. Water in bare spots can be seen as reflected sunlight on the field; emergent unvegetated mud is dark brown.



During discing of the field in summer, the berm along the east end of the field was mechanically breached at multiple locations to connect new drainage ditches (excavated in seasonal wetlands of the field) to the large drainage swale occupied by California red-legged frogs, draining to San Pedro Creek through culverts at the northwest end. August 20, 2006.



Despite new unauthorized ditching and drainage connections of the field, ditches merely reduce the extent and duration of soil saturation and flooding; they do not eliminate wetland conditions in the winter following ditching. December 27, 2006

Today, wildlife in the seasonal wetlands of the Pedro Point field includes shorebirds, meadowlarks, black-tail deer, tree frogs, small mammals, and raptors, all of which move between the field wetlands, the adjacent drainage swale wetlands, uplands, and the mouth of San Pedro Creek. Sanderlings and red-necked phalaropes occur intermittently in the flooded to saturated fields, particularly during high tides and storm wave conditions that flood the beach.. In summer, meadowlarks inhabit the field some years, particularly when grass and forb vegetation cover is thick. Small mammals, including mice, pocket gophers, and voles, occur frequently in the field (indicated by burrows, runs) and provide a prey base for raptors, including great horned owls (roosting in eucalyptus trees near the field), and red-tail hawks. Deer browse in the field at night, and at times in the morning as well. The marsh swale bordering the east end of the field has supported a breeding population of tree frogs (*Pseudacris sierra*) and a population of federally listed threatened California red-legged frogs (*Rana draytonii*) most years at least since 2000 (see special-status species, below). The DEIR fails to disclose intermittent red-legged frog populations in the vicinity (and sometimes directly bordering) the field, and the existence of probably nocturnal foraging habitat (for this species spring-fall non-breeding adults) within in the field itself. The DEIR failed to identify these significant wildlife movement and habitat connections between the field and habitats in its wetland setting. The DEIR fails to analyze potentially significant impacts to red-legged frogs using the field that would be affected by proposed conversion to coastal residential mixed use development.

The DEIR's failure to correctly characterize the wetland environmental setting (the wetland complex comprising the San Pedro Creek mouth wetlands, the drainage swale wetlands, and the historical and existing condition of the Pedro Point field wetlands) prevents the DEIR from accurately analyzing potentially significant cumulative impacts caused by wetland habitat loss, degradation or fragmentation in the lower San Pedro Creek corridor, and the Pedro Point neighborhood.

Given the outstanding biological significance of the field as the *only open, level (flatland) space left in the Pedro Point neighborhood*, and despite years of being the focus of substantial public concern and comment in scoping and other public meetings, the DEIR's failure to provide even minimally accurate, consistent baseline environmental description of the field is a very serious defect in the DEIR. It precludes accurate assessment of potentially significant impacts that are not mitigated at the policy or site-specific level.

1.6. Biological Resource Impact Assessment and Mitigation in the DEIR

Despite identifying wetlands occurring potentially throughout the field, the DEIR fails to assess potential adverse, significant impacts to Coastal Act wetlands from the proposed land use designation changes at the Pedro Point Field. The DEIR provides no explanation why converting existing wetlands of the Pedro Point field to residential mixed use development would have no significant biological or land use policy impacts. The DEIR omits any specific reference at all to the Pedro Point field wetlands in discussion of biological impacts.

Further, the DEIR's cumulative impact analysis must consider that the extent of Coastal Act wetlands in the field was modified by ditching and drainage activities conducted by the landowner and assistants on January 19, 2006, during conditions of saturation and widespread flooding of the field. As far as I am aware, ditching and draining activities of these wetlands occurred without issuance of a Coastal Development Permit or analysis of environmental impacts. The apparently unauthorized drainage of the field probably results in underestimation of the actual extent of proper Coastal Commission jurisdictional wetlands in the field. See wetland history, below. The errors in the DEIR's environmental baseline, described above, contribute to basic errors in assessment of significant biological impacts and mitigation to wetlands and special-status species.

The DEIR identifies only two potential *general* city-wide biological impacts, without area-specific reference to Pedro Point neighborhood and the specific land use changes proposed in the revised General Plan. Both of these impacts are incorrectly assessed with respect to Pedro Point biological resources, and their proposed programmatic (policy-level) mitigation is infeasible applied to Pedro Point field.

Figure 3.1-2 of the DEIR (p. 3.1-9; "Existing General Plan Land Use") shows the majority of the Pedro Point field mapped in red ("Commercial"), and apparently one small lot in the northwest corner of the field mapped in light yellow-orange ("low density residential"). The biological impacts of this proposed land use change must be assessed at a programmatic level, commensurate with *the level of detail of land use designation change in the programmatic EIR at neighborhood-scale*. The DEIR, however, fails to assess biological impacts at this geographic scale even at a programmatic level. It merely assesses biological impacts at a sweeping, vague, city-wide, policy level, omitting neighborhood-level biological impacts of specific land use changes proposed (DEIR p. 3.7-48 Impact 3.7-1; p. 3.7-57, Impact 3.7-3). The DEIR also provides only vague, policy-level "mitigation" (pseudo-mitigation; purely speculative policy without reference to physical or biological conditions) for land use change impacts in the aggregate, city-wide:

Impact 3.7-1 Implementation of the proposed General Plan would not have a substantial adverse effect, either directly or through habitat modifications, on candidate, sensitive, or special status species identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service. (*Less than Significant*)

Impact 3.7-3 Implementation of the proposed General Plan would not have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means. (*Less than Significant*)

The DEIR provides no substantial evidence and no arguments for either impact findings or their level of significance. It is inconsistent with proposed land use changes (coastal residential mixed-use development) for the field, and the presence of extensive seasonal wetlands and adjacent special-status species populations.

Although the DEIR does not need to assess impacts of land use change at a project-specific level (*i.e.*, it cannot speculate about the design of specific project proposals or their impacts in site-specific detail), it must address biological impacts that are reasonably foreseeable for the type of land uses proposed in the environmental setting under existing conditions. There is only one major land use change proposed in Pedro Point, and the DEIR provides no biological impact or mitigation discussion about it at all – not even the cursory programmatic wetland discussion presented in the Draft Land Use plan itself (LUI-30, p. 4-36, Pacifica Draft Land Use Plan, March 2014). The boilerplate, standard wetland permit discussion in the DEIR at p. 3.7-42 has no substantial bearing on impact or mitigation analysis for wetlands at Pedro Point.

Potentially significant biological impacts of proposed residential land use (development) at the Pedro Point Field and adjacent habitats are enumerated below. These are based on a more adequate characterization of the Pedro Point field wetlands, their relationship to San Pedro Creek wetlands, and their wildlife and hydrological attributes described above. None of these potentially significant biological impacts were analyzed in the DEIR.

Coastal Zone Wetland impacts

- Direct filling (loss) of the last coastal zone seasonal wetlands in Pedro Point watershed due to residential development. Lack of available off-site compensatory mitigation area within the coastal zone of the San Pedro Creek watershed (no feasible compensatory mitigation).
- Degradation of remaining coastal zone wetlands (wetland swale east of field) the San Pedro Creek watershed due to hydrological changes; increased impermeable surfaced area, decreased groundwater infiltration, increased storm runoff from drained residential lots within basin (historic floodplain).
- Degradation of remaining wetlands (wetland swale east of field) due to increased contaminant loading from adjacent residential development: pesticides (residential pesticide use and pesticide loading from runoff and drainage), increased petroleum hydrocarbon contaminant loads from street and driveway

runoff; increased surfactant runoff to the drainage swale from residential car washing.

Wildlife and Special-status species impacts

- Loss of storm high tide refuge habitat for shorebirds
- Loss of meadowlark foraging habitat
- Loss of nocturnal deer browsing habitat
- Loss of raptor foraging habitat (Great Horned Owl, red-tail hawk, kestrel)
- Loss of terrestrial foraging habitat for California red-legged frogs
- Loss of flood refuge habitat for California red-legged frogs during peak flood events of San Pedro Creek.

2.0 Land Use Impacts – Coastal Zone

The DEIR proposes to change the land use designation of the Pedro Point field from “Commercial” (Pacifica General Plan, pp. 86 and 90; DEIR Figure 3.1-2) to “Coastal Residential Mixed Use” (CRMU; DEIR Figure 2.2-1). The DEIR inaccurately states that the new proposed CRMU designation corresponds with an existing “Mixed Use” land use category (Table 3.1-3), but no such independent or category or subcategory of “mixed use” exists in the 1980 General Plan; “mixed use” is simply described as a contingent allowable use of “commercial” land use in the original General Plan (1980 General Plan p. 32-33). The project description is inconsistent, incorrect, and confusing in terms of existing and proposed land uses.

The 2014 Draft General Plan Land Use element states the following with regard to the CRMU designation on p. 4-24: “The Plan retains flexibility for any future development on the vacant site west of the shopping center, which could have residential and small-scale commercial and visitor-oriented uses. Future development should include a small park and access to the berm and the beach beyond”. Table 4.1 of the Draft General Plan states that residential density with CRMU designation may range between 10-15 gross units per acre.

The DEIR, in contrast with the original 1980 General Plan, fails to assess even at a programmatic level the area-specific effects of proposed land use designations for the Pedro Point neighborhood, and specifically for the vacant Pedro Point field, in terms of land use impacts (*cf.* 1980 General Plan, pp. 84-89). The DEIR gives no reason why the level of specificity for impact assessment should be broader and more programmatic than the level of specificity for individual parcel land use designations like the Pedro Point field, or why the level of neighborhood-specific assessment should be significantly less than that of the 1980 General Plan’s treatment of Pedro Point, especially in the Coastal Zone.

The existing land use designation of the field, “commercial” is compatible with low-intensity, visitor-serving commercial recreational land uses that support coastal-dependent (beach and coastal scenic) recreation and associated economic uses, which matches the existing zoning (commercial-recreation) of the field. Low-intensity commercial land uses that do not involve

ditching, draining, filling, paving, or construction in the field (open-space and recreational uses, special events, coastal agriculture) are potentially compatible with conservation of wetlands, environmentally sensitive habitat areas, and special-status species, and relevant Coastal Act policies. Proposed Coastal Residential Mixed Use land uses, however, are likely to have significant impacts on **Coastal Act land use policies** (cited in Draft Pacifica Local Coastal Land Use Plan, March 2014, Appendix A) and Pacifica General Plan policies involving these elements, as discussed below.

The extensive distribution of Coastal Act jurisdictional wetlands in the Pedro Point field, and the presence of California red-legged frog habitat and population in the adjacent freshwater marsh swale, both indicate that land use designations for the field must be compatible with ESHA policies of the Coastal Commission. According to the Coastal Commission's LCP Update Guide: Sensitive Habitats and Natural Resources (April 3, 2007 update), the DEIR and LCP should clearly state that only "resource dependent" development, such as restoration or nature study, is allowed in ESHA, consistent with Coastal Act §30240. No ESHA assessment for the proposed changes in land use designation of the Pedro Point field has been provided in the DEIR, which is likely related to the DEIR's failure to accurately identify wetlands and special-status species at the site. The DEIR must be revised to include this analysis of potentially significant environmental impacts even at a programmatic level.

The 1980 Pacifica General Plan provided a programmatic analysis of consistency between proposed (commercial) land use designation of the Pedro Point Field and specific Coastal Act policies (1980 General Plan p. 86), including assessment of unimproved coastal access through foot trails (p. 88). The DEIR for the General Plan update has provided no such analysis for proposed changed land use designation of the field or coastal access impacts. It merely included the Coastal Act policies as an appendix, without analysis of proposed land use designation change impacts. The changed land use designation has potential significant land use policy conflicts (impacts) with Coastal Act land use policies, each of which affects ESHA (wetlands and special-status wetland-dependent wildlife). Some examples are provided below. *The DEIR should fully assess at a programmatic level all such potential significant land use impacts, and compare the compatibility (conflict) of existing, proposed and alternative land use designations for the field in terms of Coastal Act policies.*

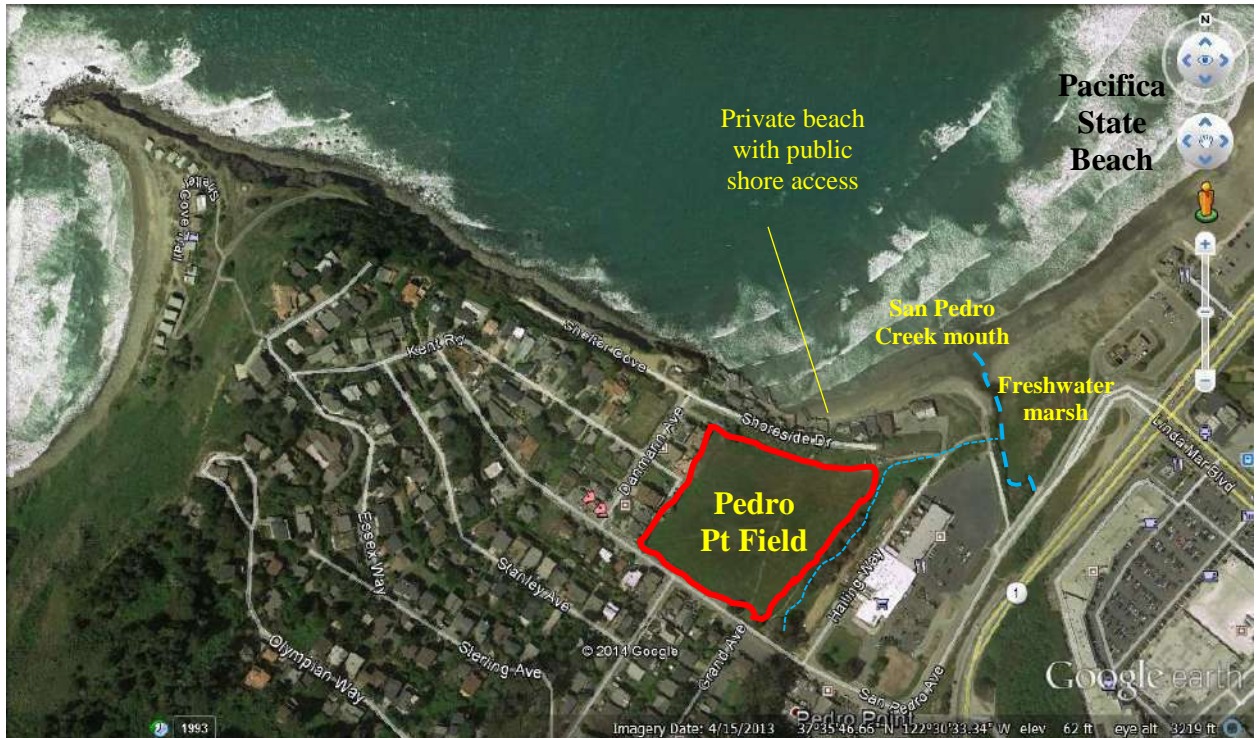
Section 30212 New development projects

(a) Public access from the nearest public roadway to the shoreline and along the coast shall be provided in new development projects except where:

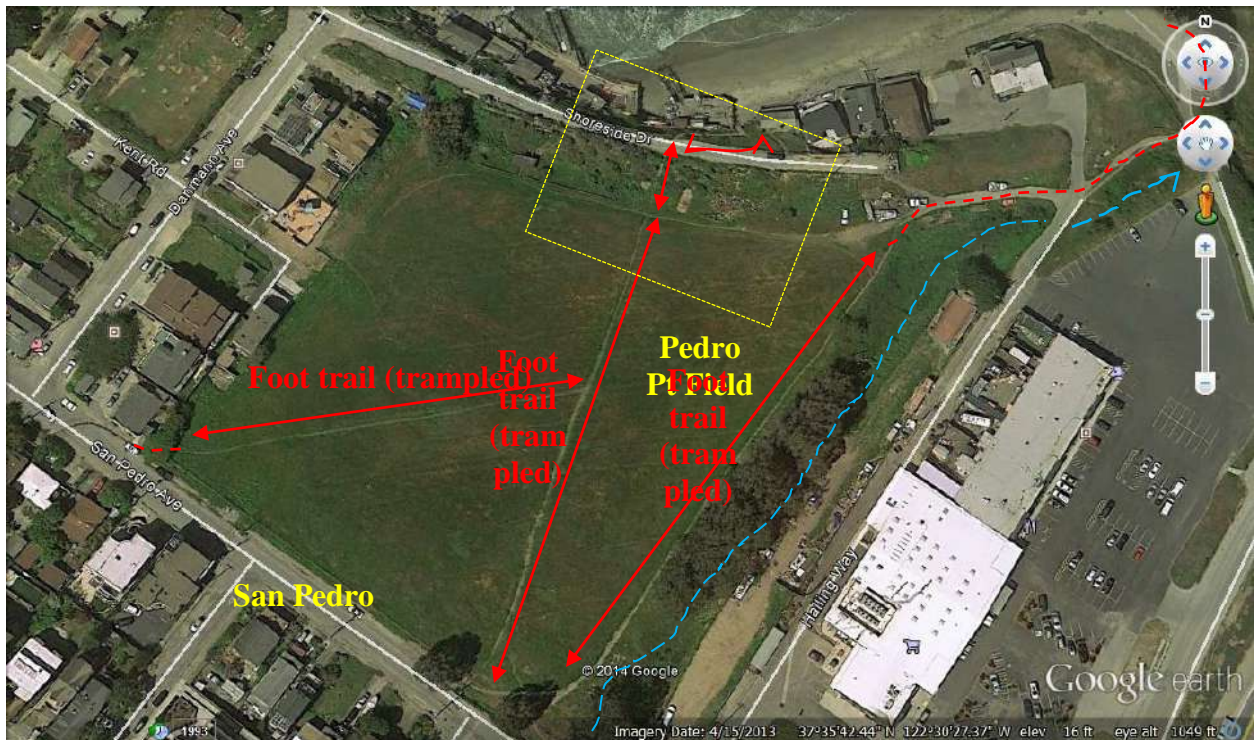
- (1) it is inconsistent with public safety, military security needs, or the protection of fragile coastal resources,***
- (2) adequate access exists nearby, or,***
- (3) agriculture would be adversely affected.***

Pedro Point field has three well-established and persistent foot trails that lead from San Pedro Avenue (the nearest public roadway to the shoreline) to a private beach with long-established open public access. The foot trails are visible in aerial photographs dating back to at least 1993 (Google Earth images) and re-emerge after being temporarily erased by discing, ditching, or

mowing. The foot trails are formed by trampling patterns established between physical points of access from the roadway to a stairway from the beach to the historic railroad berm, and to a public path to the beach at the mouth of San Pedro Creek. Foot trails are frequently used by beach visitors and surfers seeking minimal travel distances to the beach. The foot trails evidently established long before the current ownership of the property. The foot trails are the most efficient short cuts from San Pedro Avenue to the public shore; alternative routes along public roads would nearly double foot trail distance from the public roads to the shore from established access points.



Pedro Point field in relation to public and private ocean shores, and freshwater marsh and stream habitat of San Pedro Creek mouth. 2013 Google Earth image.



Foot trail network (2013) of Pedro Point Field, showing connections to levee trail access to private shore with long-established public access. Freshwater wetland drainage swale connecting to San Pedro Creek mouth is shown in dashed blue line. 2013 Google Earth image.



Detail of Pedro Point field foot trail connection to the public access walkway to privately owned beach (with public access) across the historic railroad berm. 2013 Google Earth image.

Proposed coastal residential mixed-use development may potentially eliminate or significantly impair existing long-established public access from San Pedro Avenue to the public shore. This could be mitigated by requirements to provide public access easements along existing trails or equivalent efficient alignments (similar travel distance, slopes, road access points), but the DEIR proposed no mitigation or policy that would ensure such mitigation. The impact and mitigation for this Coastal Act policy were not assessed in the DEIR. There are no military needs, fragile coastal resources, or existing agriculture to provide exemptions for this policy.

Section 30221 Oceanfront land; protection for recreational use and Development

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

The Pedro Point field is separated from the ocean only by the railroad berm, and in its original condition (backbarrier floodplain marsh) it was “oceanfront”, with line of sight to the ocean over the low barrier beach. According to Pedro Point long-term residents, the field has been used for recreation for years prior to and during the current land ownership. Recent recreational uses include children’s games, domestic animal feeding and observation (former llama and emu enclosure along the toe of the railroad berm), ball sports, playground activities extending from the adjacent Pedro Point firehouse playground, and dog walking. The field is suitable for these established recreational uses, and is suitable for other recreational uses as well.

Proposed Coastal Mixed Use Residential land use changes could eliminate, reduce, or substantially interfere with long-established recreational uses of the oceanfront land. This impact is not assessed in the DEIR. The feasibility of mitigation for this impact is not assessed, and no mitigation is proposed. Recreational uses that depend on extensive area or open scenic views may not be feasible to mitigate with small parks enclosed by development.

Section 30222 Private lands; priority of development purposes

The use of private lands suitable for visitor-serving commercial recreational facilities designed to enhance public opportunities for coastal recreation shall have priority over private residential, general industrial, or general commercial development, but not over agriculture or coastal-dependent industry.

The proposed change in land use from an open field (compatible with public access, coastal views, and recreation) to a mixed-use *private* residential development would conflict with this coastal act policy. This would be a significant impact that, by definition, could not be mitigated. General industrial or commercial development of the field would also conflict with this policy. Commercial development by agriculture including public access and visitor-serving commerce

(such as a coastal berry farm, pumpkin farm with visitor-serving amenities), in contrast, would not conflict with this policy. No mitigation is feasible for this conflict, by definition of “priority” of land uses cited in the policy.

Section 30240 Environmentally sensitive habitat areas (ESHA); adjacent developments

(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.

The field contains extensive seasonal wetlands (winter-saturated and temporarily flooded depressional wetlands and drainage swales, ditches). The perennial wetlands of the drainage swale at the east end of the field supports California red-legged frog habitat and is typically occupied by a population (see comments in this letter, above). The seasonal wetlands and the zone bordering the frog habitat of the swale meet the definition of ESHA. Residential and mixed use commercial development would likely eliminate, significantly reduce, or degrade existing wetlands and ESHA on the site. Since the field is the last undeveloped lowland floodplain of San Pedro Creek within the Coastal Zone that is available for wetland restoration and enhancement, it is infeasible to mitigate impacts to these wetlands off-site; compensatory mitigation is not available for the red-legged frog populations in lower San Pedro Creek in the coastal zone. The DEIR failed to assess impacts to this Coastal Act policy or propose any feasible mitigation for it. The only feasible mitigation for this policy impact would be avoidance of impacts by not applying the residential mixed use land use designation.

Section 30242. Lands suitable for agricultural use; conversion

All other *lands suitable for agricultural use* shall not be converted to nonagricultural uses unless (1) continued *or renewed* agricultural use is not feasible, or (2) such conversion would preserve prime agricultural land or concentrate development consistent with Section 30250. Any such permitted conversion shall be compatible with continued agricultural use on surrounding lands. (emphasis added)

The Pedro Point field was historically prime agricultural land, but was abandoned. Nonetheless, renewal of prime agricultural use of the field is potentially feasible (physically and economically) and could be integrated with visitor-serving recreational and economic development aligned with the new coastal trail to Devil’s Slide. The original prime agricultural soils are present beneath shallow fill. The site is suitable for coastal commercial visitor-oriented berry farm or produce farm and related recreational or visitor-serving uses (viz. Half Moon Bay to Davenport). Renewed agricultural use combined with tourism, some recreational uses, or eco-tourism may be compatible with conservation of seasonal wetlands and special-status wildlife if properly designed. The DEIR failed to consider feasible alternatives compatible with this section.

Section 30243 Productivity of soils and timberlands; conversions

The long-term productivity of soils and timberlands shall be protected, and conversions of coastal commercial timberlands in units of commercial size to other uses or their division into units of noncommercial size shall be limited to providing for necessary timber processing and related facilities.

The Pedro Point field is former prime agricultural land (historic artichoke farm) on rich alluvial soils (drained marshland). The soils have been degraded by placement of fill, but may be remediated by either removal of fill or addition of soil amendments to restore agricultural productivity similar to farms on the marine terraces and valleys along the San Mateo Coast south of Pacifica. There are no other potential highly productive historic farmland soils left in the Coastal Zone of Pacifica. Residential development of the field would conflict with this policy that requires the protection of long-term soil productivity. This impact was not assessed or mitigated in the DEIR.

Section 30251 Scenic and visual qualities

The scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance. Permitted development shall be sited and designed to protect views to and along the ocean and scenic coastal areas, to *minimize the alteration of natural land forms*, to be *visually compatible with the character of surrounding areas*, and, where feasible, to restore and enhance visual quality in visually degraded areas. New development in highly scenic areas such as those designated in the California Coastline Preservation and Recreation Plan prepared by the Department of Parks and Recreation and by local government shall be subordinate to the character of its setting.

The Pedro Point field is the last undeveloped lowland (floodplain) in the Coastal Zone of San Pedro Creek's watershed that retains the original overall floodplain topography and visual character of the historic farms that dominated the valley. All other valley lowlands have been developed in the Coastal Zone of Pacifica, including the Salada Valley (the historical Salada Valley farmland has been developed, drained and filled, with only the deepest lagoon bed remaining as a wetland). The visual character of the adjacent historic railroad berm is dependent on the contrast between the steep relief of the berm and the adjacent lowland flats of the field. Residential development (with or without "pocket parks") would not protect the scenic and visual qualities of the field and adjacent historic berm. Residential development of the field would fully fill the lowland open space visual character of Pedro Point. This would conflict with the policy.

Section 30253 Minimization of adverse impacts

New development shall do all of the following:

- (a) Minimize risks to life and property in areas of high geologic, flood, and fire hazard.
- (b) Assure stability and structural integrity, and neither create nor contribute significantly to erosion, geologic instability, or destruction of the site or surrounding area or in any way require the construction of protective devices that would substantially alter natural landforms along bluffs and cliffs. [...]

Most of the Pedro Point field lies approximately 15-17 feet in elevation above Mean Sea Level (MSL), only about 3-5 feet above the marsh and high tide beach at the mouth of San Pedro Creek. In addition, the alluvial soils (historical wetland) of the field have the same relative liquefaction (earthquake shaking) potential as diked bay muds and marshes in San Francisco Bay, like those that underlie filled San Francisco peninsula baylands. (Witter, Robert C., Keith L. Knudsen, Janet M. Sowers, Carl M. Wentworth, Richard D. Koehler, and Carolyn E. Randolph. 2006. Maps of Quaternary deposits and liquefaction susceptibility, nine-county San Francisco Bay Area. U.S. Geological Survey Open-File Report 2006-1037 Version 1.1; shown in Draft Pacifica Coastal Land Use Plan 2014, Figure 5.1). This condition contrasts with relatively low risk of liquefaction affecting residential and commercial development in adjacent lands built over bedrock. Structural (residential or commercial) development of the field may cause significant conflicts (impacts) with this section. In contrast, this section would be potentially compatible with recreational or other low-intensity commercial development or agricultural redevelopment of the field. The DEIR failed to analyze alternative land use designations compatible with this section.

Similarly, placing additional residential development in the last undeveloped floodplain area within the coastal zone of San Pedro Valley – currently able to function as a flood detention and storage basin when San Pedro Creek is at extreme high flood stage during extreme high tides – would conflict with this land use policy (Draft Pacifica Coastal Land Use Plan 2014 p. 5-19). The intensity, frequency, and significance of this land use policy conflict would likely increase as sea level rises, and as intense storm frequency increases with climate change. In addition, the field lies within a Tsunami evacuation area of the Coastal Zone (Draft Pacifica Coastal Land Use Plan 2014, Figure 5.3). Flooding, liquefaction, sea level rise impacts, increasing over time as indicated by the draft Pacifica Coastal Land Use plan (2014) demonstrate the conflict between this Coastal Act policy and the proposed land use change for Pedro Point field.

Section 30255 Priority of coastal-dependent developments

Coastal-dependent developments shall have priority over other developments on or near the shoreline. Except as provided elsewhere in this division, coastal-dependent developments shall not be sited in a wetland. When appropriate, coastal-related developments should be accommodated within reasonable proximity to the coastal-dependent uses they support.

Residential development itself is not fundamentally “coastal dependent”, even if the land use designation nomenclature is “Coastal Residential Mixed Use”. “Coastal” as a modifier does not denote any essential distinction in the nature of residential development, but merely describes its location in the coastal zone. Other types of commercial development based on recreational access to the shoreline or the distinctive coastal climate (*e.g.*, surfer recreational events, coastal agritourism like berry farm stands with berry farming) would have priority over residential development at this location. Residential development would conflict with this policy. In addition, development within wetlands as defined in the Coastal Act (whether or not they meet federal wetland criteria for fill authorization under the Clean Water Act) would conflict with this policy.

City of Pacifica Land Use Policy Impacts

The DEIR's proposed change in land use for the Pedro Point field also conflicts (and thus causes a significant land use policy impact) with the City's own policy on Wetlands Conservation:

p. 3.1-22 CO-I-8 **Maintain Functional Capacity of Wetlands.** Ensure that any diking, filling, or dredging in existing wetlands maintains or enhances their functional capacity. *Any alteration of coastal wetlands identified by the Department of Fish and Game must be limited to very minor incidental public facilities, restorative measures, or nature study, according to the California Coastal Act.*

The “functional capacity” of the existing wetlands at the Pedro Point field and adjacent to them are dependent on their geographic setting and landscape position – their relationship to San Pedro Creek (off-channel flood velocity refuge; population buffer for California red-legged frogs; infiltration and groundwater recharge potential; flood detention and flood peak attenuation) and other hydrogeomorphic and ecological functions (red-legged frog nocturnal foraging habitat potential; shorebird storm refuge and roost sites). There are no other undeveloped historic floodplain locations within the lower San Pedro Creek valley, let alone the Coastal Zone, where loss or degradation of these functions could be compensated by wetland restoration. Residential development of the field would likely have a significant impact on existing wetlands of the site and its vicinity, and without any feasible mitigation identified.


This City policy is also vague and unenforceable as mitigation for wetland impacts because: (a) it does not cite or define the scope or meaning of the jargon of wetland “functional capacity”; (b) it does not identify any geographic setting within Pacifica for “functional capacity” (on-site or off-site/within-watershed) and (c) it fails to cite or provide any meaningful criteria for what constitutes maintenance or enhancement of “functional capacity”. Furthermore, the California Department of Fish and Wildlife does not delineate or identify coastal wetlands as a service to local governments. The Department and the Coastal Commission use approximately the same wetland indicator criteria for determination of wetlands, but the agencies themselves generally do not conduct wetland delineations. The policy is also misleading as proposed policy-level mitigation in the DEIR because potential wetland fill in context of proposed land use designation changes in the DEIR do not involve restoration, nature study, or public facilities. The DEIR identifies wetlands at the Pedro Point field exactly where it proposes private mixed use residential and commercial development as the new land use designation. This “alteration” does not meet the criteria cited in the policy, and does not involve “enhancement” of functional capacity if the wetlands must be filled or drained for residential or commercial development. The land use designation proposed basically conflicts with this policy, and appears to be an unmitigated significant impact, since no feasible mitigation is identified. Furthermore, the DEIR alleges that no mitigation is even required because it wrongly asserts that there is no impact.

3.0 Conclusions

The DEIR fails to provide adequate analysis of potential impacts and feasible mitigation measures for the proposed land use changes at the Pedro Point field, compared with (a) existing

conditions; (b) existing land use designations under the General Plan/LCP, and (c) alternatives that are environmentally superior and compatible with Coastal Act policies. Because the DEIR is fundamentally inadequate, after such revisions, the DEIR should be recirculated for further public review.

Thank you for considering these comments. Please contact me if you have any questions.

A handwritten signature in black ink, appearing to read "Peter Baye", with a stylized, cursive script.

Peter Baye

Cc: Pedro Point Community Association

Law Offices of Brian Gaffney APC

Richard Grassetti

California Coastal Commission

LAW OFFICES OF BRIAN GAFFNEY, A Professional Corporation
446 Old County Road, Suite 100-310
Pacifica, California 94044
(650) 219 3187 Phone
brian@gaффneylegal.com

June 6, 2022

Via Email

Christian Murdock, AICP, Deputy Director of Planning
City of Pacifica Planning Department
540 Crespi Drive, Pacifica, California 94044
publiccomment@pacifica.gov

**RE: Response to DEIR Comments and Proposed May 25, 2022 Final EIR for
Pacifica General Plan Update**

Dear Mr. Murdock,

Attached please find additional comments by the Pedro Point Community Association regarding the City of Pacifica's Response to Comments and Proposed May 25, 2022 Final EIR for the Pacifica General Plan Update. To date, Pedro Point Community Association has only had time to review and respond to a portion of the City's Response to Comments and proposed Final EIR - given the May 20th release of the Response to Comments and the volume of the material (3670 page document with an 1125-page Appendix H).

Sincerely,



Brian Gaffney

cc: Pedro Point Community Association
bermanl@ci.pacifica.ca.us, hausers@ci.pacifica.ca.us,
domuratg@ci.pacifica.ca.us, fergusona@ci.pacifica.ca.us,
godwinj@ci.pacifica.ca.us, leald@ci.pacifica.ca.us, gwright@ci.pacifica.ca.us

Master Response 2: Programmatic EIR and Level Of Detail Of Analysis

The issues raised by PPCA are not whether the City should utilize a Program EIR to review the proposed General Plan (GP) Update, or the advantages of a Program EIR. These are strawman arguments that Master Response 2 pose. Instead, the issues raised by PPCA - which Master Response 2 avoids addressing - are that a Program EIR does not excuse the City from adequately analyzing reasonably foreseeable significant environmental effects of the proposed GP Update, and that a Program EIR does not justify deferring analysis of GP Update impacts to a later tiered EIR or negative declaration. See CEQA Guideline 15152.

PPCA previously commented that designating an EIR as a program EIR does not by itself decrease the level of analysis required in the EIR. (*Friends of Mammoth v. Town of Mammoth Lakes Redevelopment Agency* (2000) 82 Cal.App.4th 511.) The sufficiency of the information contained in an EIR is reviewed in light of what is reasonably feasible. (CEQA Guideline 15151; *Kings County Farm Bureau v. City of Hanford* (1990) 221 Cal.App.3d 692, 733.) At minimum, an EIR “must include detail sufficient to enable those who did not participate in its preparation to understand and to consider meaningfully the issues raised by the proposed project.” (*Laurel Heights*, 47 Cal.3d at p. 405.)

The City’s Response to Comments does not respond to this prior PPCA comment, noting at Response to Comment C123-14 only that “this background information is noted.” Master Response 2 impermissibly tries to evade the EIR’s CEQA errors by hiding behind “a citywide assessment” that “does not assess project-specific impacts of potential future projects.” This Program EIR must analyze what is reasonably foreseeable from the proposed GP Update, and fails to do so. The fact that later project-specific CEQA analysis will be conducted does not relieve this EIR from fully complying now with CEQA.

Master Response 3: Buildout And Regional Housing Needs Allocation (RHNA)

PPCA and others commented that the EIR was flawed as it does not analyze what is reasonably foreseeable - 1,892 housing units to comply with the Regional Housing Needs Allocation, additional building of Accessory Dwelling Units (ADUs), additional development allowed by SB 9, and additional building by reasonably foreseeable lot splits.

The Response to Comments dismisses these reasonably foreseeable development as “maximums” and “theoretical” and thus does not correct the CEQA flaws raised by PPCA. In addition, PPCA does not refer to maximums or point to anything which is speculative or simply theoretical.

Remarkably, the Response to Comments attempts to justify the absence of the needed analysis as the reasonably likely housing PPCA points to “would exaggerate impacts” and “result in mitigation measures requiring the construction of road and utility infrastructure.” It goes without saying that CEQA does not excuse analysis for these

reasons; they are exactly why detailed analysis is required before the decision makers approve a proposed project like the General Plan Update.

The Response to Comments further justifies the absence of needed analysis by claiming that the General Plan Update “is a technical update to the 2014 Draft General Plan Update prepared previously” and that the scope of the General Plan Update does “not include substantial land use changes outside of the Sharp Park Specific Plan area or include community engagement to inform such changes.” This is just false. The currently proposed GP Update will include redesignating numerous sites throughout the City including redesignating the San Pedro Avenue property.

Master Response 3 admits that the City knew of the RHNA numbers in May 2021 eight months prior to release of the draft EIR. The City does not explain why these reasonably foreseeable housing changes purportedly “were beyond the scope of the Proposed Project” and the draft EIR.

Master Response 3 also admits that the City knows “that additional land use changes, community engagement and environmental analysis will be needed.” Yet, through Master Response 3 the City reveals that it intends to adopt a legally inadequate EIR – that willfully ignores the RHNA, ADUs, SB9 development and lot splits – because this will somehow “provide a better basis” and “a useful programmatic starting point for consideration” of the known additional land use changes. This Response violates CEQA Guideline as it does not constitute good faith, reasoned analysis.

Nor does the City’s promise - that the analysis of the RHNA and ADU housing impacts will be conducted later in a Housing Element CEQA document’s cumulative impact assessment – comply with CEQA. This future analysis does not absolve this EIR from analyzing now what is reasonably foreseeable.

Master Response 4: Undeveloped San Pedro Avenue Sites

The City’s Response notes that public comments raised the issue that the CRMU designation is not consistent with the Coastal Act. The Response notes Coastal Act sections 30221, 30222, 30240, 30240, 30251, 30253. The City provides no response regarding section 30222.

It is important to note that this Master Response 4 only points to a portion of the Coastal Act inconsistencies raised by PPCA members Cherie Chan and Bruce Ferry. Likewise at Response to Comments C53-3 through the C53-13 the Final EIR fails to address the Coastal Act inconsistencies as required by CEQA.

There is no substantial evidence to support the City’s assertion that “All existing open space areas are preserved and scenic resources are protected under the Proposed Project” given what is proposed by the GP Update for the undeveloped San Pedro Avenue site.

The Response claims that existing statutes “coupled with the beneficial impacts of the Proposed Plan policies listed above, reduce impacts to less than significant” without explaining how or why impacts are reduced to insignificance.

Master Response 6: ESHA

As in Master Response 4, Master Response 6 concludes that compliance with federal and state environmental laws will reduce impacts to insignificance – even though those same laws the City asserts can be ignored now as part of the GP Update approval.

Remarkably, rather the City contests the determination of the California Coastal Commission that the undeveloped San Pedro site is an ESHA. Such a position runs contrary to well-established CEQA norms for how a lead agency must consult with responsible agencies and how an EIR must consider compliance with the Coastal Act.

City Response to Comments of the California Coastal Commission

The City fails to comply with CEQA Guideline 15088 in responding to comments of the California Coastal Commission (“Commission”). The City does not describe the disposition of significant environmental issues raised by the Commission. The Response does not provide detailed reasons and reasoned analysis why the Commission’s specific comments and suggestions were not accepted.

The Commission commented (A6-1) that the 2022 General Plan Update, the 2022 Sharp Park Specific Plan and the associated EIR must be consistent with the [currently] certified LCP - and not the LUP update submitted to, but not certified by, the Commission. The City’s Response did not respond at all to this Commission comment regarding the need for consistency between the 2022 General Plan Update and the currently certified LCP.

The Commission further commented (A6-1) that once an updated LUP is certified by the Commission, the City’s GP/SPSP would have to be updated to then be consistent with the updated LCP. The City’s Response represented the City’s contrary view that “to the extent the General Plan Update proposes any policies beyond those which were sent to the California Coastal Commission for review and certification,” only then would a subsequent LCP amendment be necessary to “make the LCP consistent with the General Plan.” Thus, while the Commission urges a GP Update to be consistent with the current LCP, the City – *without explanation* – proposes the reverse: to subsequently amend the LCP to make it consistent with the GP.

The Commission further commented (A6-1) that it makes “the most sense to coordinate timing of the GP/SPSP for after the LUP is certified, given the outstanding nature of the LUP certification.” The City fails to provide any response to this comment.

The Commission commented (A6-2) that “policies proposed in the GP/SPSP that correspond to coastal resources cannot contradict the certified LCP and thus [the] Coastal Act” and that “concerns regarding [GP policy] inconsistencies with the Coastal Act that have been noted to City staff over the years.” The Commission specifies that specific GP policies “need to be made fully consistent with the currently certified LCP, and thus Coastal Act,” pointing to GP policies in Chapter 6 ‘Open Space and Community Facilities,’ Section 6.3 ‘Coastal Access’; Chapter 7 ‘Conservation,’ Sections 7.1-7.3 ‘Water, Biological, Land and Soil Resources’; and Chapter 8 ‘Safety,’ Sections 8.1-8.3 and 8.5-8.6 ‘Seismic and Geologic Hazards, Flooding and Drainage, Coastal Resilience, Fire Hazards, and Public Safety and Emergency Management’ (and any other relevant

policies). The City fails to provide detailed reasons and reasoned analysis why the Commission's specific comments and suggestions were not accepted, claiming that the Commission's comment does not pertain to the merits of the DEIR.

In addition, the Commission's March 1 2022 email attached over 90 pages of prior comments to the City. See Planning Commission June 1, 2022 Special Meeting Agenda & Staff Report, PDF 1522 – 1614. These Commission comments raise significant environmental issues regarding *inter alia* Project visual impacts of development on community character and on views, Project impacts on public access and recreation, geotechnical and coastal hazards impacts, the efficacy of proposed GP policies, and GP consistency with the Coastal Act. (A6-3) The City failed to respond to any of these issues, noting only that the "correspondence is received." PDF 813. The City's response certainly did not describe the disposition of significant environmental issues raised in these 90 pages, and did not provide any reasons why specific Coastal Commission comments and suggestions were not accepted.

Recirculation of the EIR is Required.

The City is required to recirculate the EIR for further comments and consultation as it has added significant new information. Significant new information has been added to the EIR after the comment period on the draft EIR. This changes include *inter alia*

1) Elimination of CO-I-46 despite that the Final EIR repeatedly relies upon this mitigation to determine impacts related to the alteration of drainage patterns, flood flow, stormwater runoff, and exceeded capacity of stormwater drainage systems would be less than significant.

In the General Plan released for public review in January 2022, Policy CO-I-46 is "Shoreline Protection. Continue to prohibit new development requiring shoreline alterations." This policy is cited also in the Draft EIR as a required mitigation for the following impacts:

Impact 3.5-3 (substantially alter existing drainage patterns, including through the alteration of the course of a stream or river or through the addition of impervious surfaces);

Impact 3.6-2 (substantial soil erosion or topsoil loss impacts);

Impact 3.7-2 (substantial adverse impact on riparian habitat or other sensitive natural communities);

Impact 3.7-3 (substantial adverse wetland impacts).

The draft EIR also states that CO-I-46 "would help to protect biological resources on a large scale." DEIR p. 3.7-65. In addition, the California Department of Fish and Wildlife commented on September 8, 2020 about shoreline protection in regards to the proposed GP Update

Yet, *without explanation*, shoreline protection has been entirely gutted in the Final EIR and CO-I-46 is now reclassified as "Mineral Resources. If significant mineral

resources are discovered with regional agencies to determine a course of action to protect the resources and, if applicable, extract them in an environmentally sensitive manner.”

- 2) The Coastal Commission determination, based on a biological study, that the whole of the San Pedro site constitutes ESHA
- 3) the acknowledgement – for the first time - that the proposed Project fails to meet the City’s SB32 emissions reduction target (FEIR redline p. 3.4-36);
- 4) the addition of an AB 32 2040 Mass Emission Reduction Target of 63,683 Metric tons CO2e/year in Table 3.4-3 and Table 3.4-4 and Table 3.4-5;
- 5) the addition of Table 3.4-1: Emissions Targets Pursuant to SB 32;
- 6) the addition of City of Pacifica SB32 Thresholds at Table 3.4-2;
- 7) the elimination of Table 3.4 CAP GHG Emission Projection and Reduction Targets;

Each of the above changes, are not mere typographical corrections or clarifications as the City claims. The changes above deprive the public of a meaningful opportunity to comment upon substantial adverse environmental effects and feasible ways to mitigate or avoid these impacts. Pursuant to CEQA Guideline 15088.5 the City is required to recirculate the EIR for public comment and agency consultation.

From: Robine Runneals <pacfam5r@pacbell.net>
Sent: Friday, May 2, 2025 4:43 PM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update).

To: California Coastal Commissioners, re agenda item TH9a, 5-8-2025.

5/2/2025

Pacifica's LCP/LCUP update application.

Dear Commissioners,

As a three-generation family residing in West Sharp Park since the 1970s, just two blocks east of the Beach Blvd. Promenade Seawall, we are writing to express our significant concerns regarding the proposed Local Coastal Program (LCP). This neighborhood is our forever home and our most substantial asset, where we have raised a family, worked to afford our home on Lakeview Avenue, and now enjoy our retirement. Our children and grandchildren also live, work, and attend school in this area.

We feel it is critical that our questions and concerns about this LCP are addressed, as they deeply affect the future of our family, our neighbors, and our historic neighborhood, especially given the current difficult economic climate, which leaves many of us with no alternative place to live. We have a long history of respecting and caring for this beach environment and wish to continue doing so for our community and homes.

We have several major unanswered questions:

- * Will vulnerable senior citizens be able to remain in their homes if this area is designated a Flood Inundation or Hazard zone, as your staff has recommended by overlaying the existing Tsunami zone from the beach to Highway One?
- * How will a Flood Inundation zone designation impact our ability to maintain or obtain homeowners insurance? With current policy cancellations, this designation could exacerbate the issue, making insurance unaffordable or unavailable.
- * Will insurance for renters, businesses, and public events in this area also be affected?
- * How will living in a Flood Inundation zone affect lenders and our ability to secure loans for home maintenance or to sell our properties? Could this lead to climate redlining in our neighborhood?
- * Will our homes and the neighborhood face devaluation as a result of this designation? How might this impact property taxes at the local, state, and federal levels?
- * Could this situation lead to neighborhood blight and insurance companies withdrawing due to a perceived lack of maintenance?

- * Will living in a flood inundation or hazard zone result in a loss of essential city services, such as fire protection or infrastructure?
- * Will our access to basic utilities like water, power, and telephone be jeopardized?
- * If displacement becomes unavoidable, where will we go, considering Pacifica's existing housing shortage?

This community is understandably fearful due to the overwhelming number of unanswered questions and concerns surrounding this LCP proposal. We find a lack of provisions that support the lives and well-being of the people who live here.

It appears the current proposal prioritizes preservation and the landward expansion of beaches in Pacifica at the expense of thousands of lives, livelihoods, and Pacifica's overall economy.

It's important to recognize that Sharp Park Beach has maintained its size due to the natural protection offered by Mori Point, which acts as a natural groin, trapping sand and buffering against erosion. This is similar to the beach conditions at Rockaway and Linda Mar.

Furthermore, the promenade seawall (built in the 1980s) and the Sharp Park golf course levee (originally built in 1941) provide crucial additional protection, allowing our beach to remain a vibrant and popular recreational area, a condition also supported by the Pacific Beach Coalition's valuable efforts.

While offshore reefs may contribute to coastal resilience, they are not a sufficient solution for Sharp Park and neighboring Fairway Park, particularly against seasonal flooding and sea-level rise. The promenade seawall and golf course levee have proven essential in protecting our homes and businesses from winter storms, especially with increasing rainfall and drainage issues. Both structures also ensure vital ADA accessibility to the beach, pier, coastal trail, Mori Point, and endangered species wetlands. Therefore, for Sharp Park, an improved seawall and levee, combined with beach nourishment, are necessary to protect not only the beach but also our homes, businesses, and infrastructure. While sand motoring and offshore reefs could benefit other beaches in Pacifica facing bluff erosion, they are not a comprehensive answer for Sharp Park's unique needs. The levee and an elevated seawall can continue to safeguard our community. We need to maintain affordable insurance options for residents and businesses and ensure continued access to lenders for essential home maintenance.

We urge you to consider the children who attend our local schools, the working families, and the businesses on Palmetto Avenue and Francisco Boulevard striving to survive the current economic challenges. Please do not forget the lifelong residents who have built their lives here, the vital support programs offered by the Pacifica Resource Center, the Library on Hilton, our new City Hall, and the senior citizens who call this place home. We implore you to keep the people who live here in mind throughout the planning and implementation of any sea-level rise response.

Please do not render senior citizens, families, and our entire neighborhood as forced managed climate refugees.

Sincerely,

Robine Runneals & Family
395 Lakeview Ave. in west Sharp Park
Pacifica, Ca 94044

Honey, Julian@Coastal

From: Stan Zeavin <margstan@sbcglobal.net>
Sent: Friday, May 2, 2025 10:11 AM
To: Pacifica LUP Update
Subject: Fw: Pacifica's LCLUP: Amendment Number LCP-2-0056-3

Hello, Coastal Commissioners,

I live in Pacifica and would like to thank the Commissioners for continually supporting the CCC guidelines to protect California's coastline, especially against the continued onslaught to those guidelines from Pacifica's City government.

I strongly oppose the inclusion of the Special Shoreline Resiliency Areas in Pacifica's updated LCLUP.

If this document is approved with the SSRAs included, it could allow less oversight from the CCC. Pacifica will have additional leeway to put up its proposed extended and taller cement seawall, including additional new non-coastal dependent development in an already stressed hazard zone.

The city government's broadcasting how overwhelming the support for the SSRAs is simply an outright lie. Although the City Council's vote of 4-1 was not unanimous, of the four yes votes, one council member stated she preferred the CCC deal with the question. Furthermore, since that vote, there are two new members sitting on the council.

From the city's point of view, the SSRAs are all about getting the Beach Blvd. Seawall built. Six years after our 2018 Adaptation Plan (CCC friendly) and four years after our Beach Blvd. Infrastructure Resiliency Project (BBIRP) Alternatives Analysis Report (among many problems in it, there is no managed retreat), there is no movement towards a Plan B. As yet there seems to be no significant grant for the seawall, no timetable for switching to a Plan B, and no idea as to what percentage of money the taxpayers of Pacifica will have to pay for the wall's construction (one city estimate is \$235M when paid off).

Originally, this seawall was sold to Pacifica's citizens as protection for the Sharp Park pump and sewage system which services 40% of the population. At that time the estimated cost of moving and/or replacing parts of this system was \$50M. In reality, the seawall was to be built to protect the 5% who live in the hazard zone and to create new development utilizing the wall as protection.

At this point the proposed seawall won't be completed before the BBIRP estimated time that the sewer system will need to be revamped.

So much time, energy and money have gone into the development of the seawall project, other projects that would protect a greater percentage of our citizens such as moving the Sharp Park sewer system/pumps and acknowledging our very real fire dangers have been ignored.

Commissioners, please support the removal of the SSRAs from Pacifica's LCLUP. It will not only help us keep Pacifica on track within the CCC guidelines, but also help keep Pacifica solvent.

Stan Zeavin
Pacifica

Honey, Julian@Coastal

From: Sue Digre <suedigre@gmail.com>
Sent: Friday, May 2, 2025 4:59 PM
To: NorthCentralCoast@Coastal
Subject: May.8.agenda item 9a LCLUP

Follow Up Flag: Follow up
Flag Status: Completed

SSRA's special shoreline resiliency areas.

In Pacifica there has been a lot of opinions against these and for a long time. What's most important is that the Public at-large, the Voters in Pacifica did not have input. This idea did not come from Public Council meetings here.

The Public at Large across the State of California voted for the Coastal Act and the Coastal Commission to protect that vote.

The Public at Large across the State is also not fully informed about SSRA's nor has the State heard received from the Public the right to change the Coastal actm

Stick to the Vote of the Public for the Coastal Act.

Ringuette, Oceane@Coastal

From: Summer Lee <summerleeart@yahoo.com>
Sent: Friday, May 2, 2025 2:45 PM
To: NorthCentralCoast@Coastal; Pacifica LUP Update
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Commissioner Justin Cummings, Chair of the Coastal Commission:

I am writing as a 25 year resident of Pacifica who has attended every hearing regarding this LCLUP and submitted comments to the City of Pacifica along the way.

1) **The SSRA section of the LCLUP will be harmful to Pacifica.** It was schemed by one lone council member backed by realtor interests, in the face of overwhelming community opposition. In fact, historical adversaries on the issue of Pacifica adaptation came together for once to oppose SSRA's because of the lack of equity, unfeasible implementation, and its promotion of high density development in hazard zones. In fact one council member in a deliberation in the late hours of its final hearing, deferred her vote thinking that the Coastal Commission would be a backstop against the SSRA policy. To further weaken the idea that SSRA's have leadership support, we have had two new council members since the last approval of this draft.

Our City is already on the brink of bankruptcy in no small part due to ill-conceived development along our coast-side, and this SSRA policy not only contradicts the heart of the Coastal Commission's mission, but it will set a precedent for every other coastal community to allow for backwards planning, destruction of public access to beaches, and the degradation of neighboring non-SSRA areas.

The City of Pacifica also is patently and admittedly unable to implement and enforce the provisions of the SSRA policy.

The SSRA policy will wreak irreversible disastrous outcomes not just for Pacifica, but for the rest of California.

2) The Quarry should remain in Coastal Commission permitting authority. While the CCC has a large caseload, the Quarry should not be removed. The quarry has a complicated history and ecology, important beachfront location, large acreage next to a metropolitan area with intense public use -- and most importantly, it contains important Native American history and resources the City refuses to acknowledge.

3) The rezoning of the Calson field should be taken out. This was an unlawful rezoning by the City. The site is not appropriate for high density housing because of flooding, and in a few years will be an important access point to the existing Linda Mar Beach. It could instead be imagined as a future nature based solution to sea level rise or commercial serving resource for Linda Mar beach goers.

The rest of the new LCLUP should be approved of and certified and we will finally have an updated document that acknowledges all the conditions that have changed since 1980 to move into next decades with.

Many thanks,
Summer Mei Ling Lee

Honey, Julian@Coastal

From: Suzanne Moore <suzyqettu2@gmail.com>
Sent: Friday, May 2, 2025 10:31 AM
To: NorthCentralCoast@Coastal
Cc: Suzanne Moore
Subject: TH 5/8/25 agenda item #9a Pacifica's LCLUP

Honorable Commission members and staff,

Thank you for your work to date on Pacifica's LCLUP.

The draft updates to the 1980 LCLUP are positive, provide clarity through clearer definitions and guidelines on development in the Coastal Zone, address sea level rise and erosion, and write in language for disclosures. Future generations will not be caught off guard as to coastal hazards.

I see no need, however, to be among the first communities to attempt Special Shoreline Resiliency Areas. In spite of City meetings to clarify SSRAs, I and many others in my community remain mystified, consider SSRAs experimental and untested, and worry about unintended consequences - consequences that could be irreparable. I question whether SSRAs challenge the spirit of the law of the California Coastal Act.

Pacifica City staff report a collaborative relationship with the California Coastal Commission. I have confidence that the CCC is balancing coastal access and habitat protection with affordable housing needs. I understand this kind of equity is important to the Coastal Commission and there are current commissioners especially looking for equity and inclusion.

I trust the experienced opinions and collaborative efforts of the CCC. For these reasons, I would like to exclude SSRAs from our LCLUP.

Thank you Coastal Commission Staff, for reminding us all that the LCLUP must be consistent with the Coastal Act, must specify the intended uses of land within the Coastal Zone, and serve as a policy/framework for future actions.

Our coast is a treasured Pacifica resource and is vulnerable to mismanagement. Our duty is to coastal stewardship, coastal preservation for generations to come, and equitable access - a duty made clear by the vote of the people and passage of the California Coastal Act.

Thank you.

--

Suzanne Moore

Home 650.557.0867

Cell 650.243.7310

Honey, Julian@Coastal

From: Victor Carmichael <vcarmichael@comcast.net>
Sent: Friday, May 2, 2025 5:07 PM
To: NorthCentralCoast@Coastal
Cc: Victor Carmichael
Subject: Coastal Commission hearing re: Pacifica's LUP

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Staff and Commissioners:

Having lived in the coastal zone of Pacifica since 1992 across from the area known as the Northern Dunes, my neighbors and I have had to turn to the California Coastal Commission several times to protect nearby coastal resources.

Pacifica has long served as a moderate income coastal community. But as 'coastal living' become fashionable Pacific like many beach towns on both coasts became a magnet for high-end residential development. And, thus constant conflict has ensued between those who wish to retain their town's ambiance and environmental integrity versus those who wanted to capitalize on it.

These factors have led the to the difficulty in updating our very dated 1980 Local Coastal Plan. While only 10% of Pacifica's coastline is armored comprising two area, one of those is an aging seawall that protects infrastructure (a sewer line beneath Beach Blvd). That sewer line harkens back to the days when it fed into a now relocated water treatment plant. Now the contents must be pumped back eastward to the new plant. However, the pier that was installed to facilitate the previous outflow has become a popular draw with hopes to re-vitalize and entire area as major tourist draw centers on that pier.

I also appreciate the tremendous amount of staff resources that had to be directed at this issue. I commend the CC staff for the results. This is a very complete and thorough staff report. The LUP Update that it addresses had to contend with several opposing factions. For the most part it is very impressive document and seems to do most of what was intended to do. However, several acceptances within the LUP Update that are troublesome:

- The unnecessary zoning change to the Carlson property to allow for housing is one. Surrounding residents have tried for years to have this area set aside as a sort of basin to allow for runoff from Pedro Mountain in wet flood prone years as well as an area set aside relative to SLR concerns.
- Another unnecessary change is allowing the City to grant CPDs (Coastal Development Permits) for the Quarry. The City has a record of attempting to facilitate unwise plans for years

(.i.e. using it as land fill) only to be blocked by the public. Popularly acceptable outcome is more likely to come via the Coastal Commission than the City.

A new and disquieting element of this LUP Upgrade now acceptable per the staff report is the introduction of (SSRAs) Special Shoreline Resiliency Areas. The staff report acknowledges that the SSRA provisions are inconsistent with Coastal Act's limits on shoreline armoring, which direct their denial. Maintenance of existing armoring to protect pre-Coastal Act structures has long been acceptable Coastal Commission but using an SSRA (good for a long 20 years) to allow for substantial major armoring improvement in no way protects the existing coastal resource - the sand. The key here is that the SSRA concept looks to be a way to allow the City to engage in a (yet to be funded) major over overall of Sharp Park's Beach Blvd pier area.

In closing I would like to say in general I support the balance of the LUP upgrade as presented here. I also appreciate the tremendous amount of staff resources that had to be directed at this issue. I also want to commend the CC staff for the effort that went into this very complete staff report. I that above cited elements are dropped.

Sincerely,

Victor Carmichael

Ringuette, Oceane@Coastal

From: William.Leo Leon <leoleonimages@outlook.com>
Sent: Friday, May 2, 2025 3:06 PM
To: NorthCentralCoast@Coastal
Cc: Honey, Julian@Coastal; Ringuette, Oceane@Coastal; Kris Geiger
Subject: Addendum Public Comments, Agenda item 9a May 8, 2025 Pacifica LCLUP Update
Attachments: Pacifica 1969_n.jpg

May 2, 2025

To: California Coastal Commissioners
Staff Coastal Commission

Via email: NorthCentralCoast@coastal.ca.gov

RE: Addendum Public Comments, City of Pacifica 1980 Local Coastal Land Use Plan (LCLUP) Update_
Special Shoreline Resiliency Areas (SSRAs)

Dear Commissioners and Staff,

For the record we are writing to oppose the so-called Special Shoreline Resiliency Areas (SSRAs) being considered. Having lived in Pacifica for nearly 40 years, we have participated in numerous public forums during that time period. We can state with certainty that time and time again Pacifica residents have placed the protection of its environmental and Biological resources as a top priority.

As proof of the great extent of the loss of our beaches and coastal resources, see the attached photo of Pacifica's shoreline showing Mori Point to Pacific Manor as it existed in 1969.

As you can plainly see, the photo shows a wide and uninterrupted beach running the entire length of the photo. At the time of the photo there were no seawalls or armoring of Pacifica's coast. Notice, there is no Pacifica Pier, there is no Berm at Sharp Park Golf Course, there is no seawall on Beach Boulevard. The width of the Bluff top offers a glimpse of how much has been lost. And a view of predevelopment on some sections of North Palmetto, south of Manor Drive. Also, The houses built on the bluff at Esplanade near Manor drive, as they appeared before bluff erosion caused their demise.

By comparing coastal conditions then and today, we can clearly see the significant loss of our Bluff tops, beaches, and coastal access in the subject area. The significant loss of our beaches coincides with the ongoing and ever-increasing addition of seawalls and coastal armoring. I conclude that further armoring will lead to further loss of our beaches and coastal access.

It is our opinion that SSRAs if adopted as policy will introduce the potential to undermine the Coastal Act policies. By allowing new development behind shoreline protection devices (aka seawalls, rip rap, hard armoring) in known coastal hazard areas. Areas that are prone to flooding, street closures and public safety issues.

In closing, we want to reiterate that there is no study to support an assumption or belief that a majority of Pacifica supports more armoring of its coast or SSRAs in the LCLUP Update. To the contrary, public comments made since the introduction of SSRAs (12/5/23) reflect the opposite.

Respectfully,

William "Leo" Leon
Anne "Kris" Geiger
111 Olympian Way
Pacifica CA 94044

Attachment, Photo

1969



Honey, Julian@Coastal

From: William.Leo Leon <leoleonimages@outlook.com>
Sent: Friday, May 2, 2025 12:35 PM
To: A Ecopop
Cc: Ringuette, Oceane@Coastal; Honey, Julian@Coastal
Subject: Comment Letter CCC Agenda Item 9a, City of Pacifica LCLUP May 8, 2025
Attachments: CCC Exhibit 5.pdf; CCC Exhibit 6.pdf; CCC Exhibit 7.pdf; CCC Exhibit 8.pdf; CCC Exhibit 9.pdf; CCC Exhibit 11.pdf; eMail Aug 16, 2021, William.Leo Leon.pdf; F16a-CCC CDP Report.pdf; Figure 3.7. 3 Sensitive and Critical Habitat.pdf; Figure 4.3_ESHA LCLUP.pdf; Figure 7. 3 Sensitive and Critical Habitat.pdf; My GPU-LCLUP Comment Letter 1.pdf

Date: May 2, 2025

To: California Coastal Commissioners
Staff Coastal Commission

Via email: NorthCentralCoast@coastal.ca..gov

RE: City of Pacifica 1980 Local Coastal Land Use Plan (LCLUP) Update_ Rezoning of undeveloped vacant parcel on San Pedro Avenue

Dear Commissioners and Staff, We are writing to request you consider not approving and/or delaying your decision on the Rezoning of the undeveloped vacant parcel on San Pedro Avenue requested by the City of Pacifica in the LCLUP update. There are errors and omissions regarding Biological Resources on LCLUP maps that need to be addressed and corrected, the LCLUP needs to reflect updated information before the requested LCLUP Rezoning is considered by the Coastal Commission. Once the data is updated to reflect the actual Biological resources present in the area, in our opinion, it will show that a Rezoning to allow for residential development zoning is not appropriate for the site.

The following specific areas have been previously submitted to City of Pacifica. They identify where information in the LCLUP is inconsistent and/or missing. The data and maps need to be corrected for the public and decision makers to understand the potential impacts of the Rezoning on any future Project or Application.

1. Sensitive and Critical Habitat

- GPU Figure 7-3, Potential Environmentally Sensitive Habitat Areas
- 2022 Draft EIR Figure 3.7-3 Sensitive and Critical Habitat
- 2020 LCLUP Figure 4-3, California Coastal Commission, Staff Report 2-18-21 CDP Application 2-19-0026

In reviewing these Figures, I noticed inconsistency and omissions with areas described in the Figures as:

1. Potential Environmentally Sensitive Habitat Areas (ESHA)
2. Critical Habitat: California Red-legged Frog
3. Other Sensitive Areas: a. High Habitat Value/Threatened by Fragmentation b. Wildlife Movement Corridor

2. Inconsistencies:

Neither GP Figure 7-3 nor 2022 Draft EIR Figure 3.7-3 show California Red-legged Frog listed under Critical Habitat as shown in Figure 4-3 at Laguna Salada (Sharp Park Golf Course) and Mori Point (GGNRA).

Neither GP Figure 7-3, 2022 Draft EIR Figure 3.7-3 or Figure 4-3 show 1) Sensitive and Critical Habitat at the undeveloped field adjacent to San Pedro Avenue, or 2) the unnamed Waterway that runs from San Pedro Avenue and eventually connects to San Pedro Creek.

Instead, GP Figure 7-3 and 2022 Draft EIR Figure 3.7-3 show the undeveloped field adjacent to San Pedro Avenue designated as Urban and Non-Urban Land with Little or No Habitat Value.

Figure 4-3 shows no designation of either Potential ESHA or Critical Habitat for the undeveloped field adjacent to San Pedro Avenue.

3. Omission of Potential ESHA and Critical Habitat Information Possessed by the City. Neither GP Figure 7-3 nor 2022 Draft EIR Figure 3.7-3 nor the narrative discussions within the documents consider the studies, statements and the decision of the California Coastal Commission (“CCC”), which found the undeveloped area adjacent to San Pedro Avenue to contain ESHA and the unnamed waterway to be considered as Waters of the United States. Furthermore, this CCC delineation showed that the adjacent watercourse that runs along the western edge of the undeveloped San Pedro Avenue site constitutes areas of both federal and state wetlands, with the state wetlands spanning the full length of the watercourse, thus comprising the entire length of the San Pedro Avenue property’s western boundary. See Pages 612: California Coastal Commission, Staff Report 2-18-21, CDP Application 2-19-0026:

Both the Coastal Act and the LCP, as guidance, emphasize the need to protect sensitive habitats within the coastal zone, including wetlands and environmentally sensitive habitat areas (ESHAs).

In communication with the City of Pacifica, Coastal Commission staff expressed concerns going back over a decade with regard to potential impacts of development on the habitats located on and adjacent to undeveloped San Pedro Avenue site, indicating that any proposed development at the undeveloped San Pedro Avenue Site should consider measures to avoid or reduce potential impacts on the adjacent unnamed watercourse, which most likely would meet the one-parameter definition of wetlands under the Coastal Act, and stating that a one-parameter wetland delineation should be conducted (see comments in Exhibit 6).

Despite the CCC recommendation to conduct a one-parameter wetland delineation at an earlier stage in the process, a delineation undeveloped San Pedro Avenue site and adjacent drainage channel was not prepared for this project until November 2019, after the City of Pacifica had already approved a local CDP for the portion of the project located in their CDP jurisdiction.

This delineation showed that the adjacent watercourse that runs along the western edge of the undeveloped San Pedro Avenue site constitutes areas of both federal and state wetlands, with the state wetlands spanning the full length of the watercourse, thus comprising the entire length of the western boundary, undeveloped San Pedro Avenue site. On the northern end of the property, the federal and state wetlands encompass an approximately 0.096-acre arroyo willow thicket that partially extends onto the undeveloped San Pedro Avenue site and takes up approximately 0.048-acres at the northern border of the (see delineation undeveloped San Pedro Avenue site of these features in Exhibit 5). The federal and state wetlands present onsite include arroyo willow thicket, perennial rye grass fields, small-fruited bulrush marsh, smartweed patch, the flow channel, and the wetted watercourse channel.

During an initial assessment of the project-related biological information, Commission staff ecologist Dr. Lauren Garske-Garcia identified for the Applicant that the Commission typically applies a minimum wetland buffer of 100

feet. Examining the site-specific circumstances associated with the property known at that time, Dr. Garske indicated that the minimum possible justifiable wetland buffer, if appropriately mitigated, would be 50 feet from the edge of the arroyo willow thicket and 25-feet from the remainder of the state wetlands that comprise the entire length of the drainage channel along the property's western edge. The Applicant submitted revised plans in response to this feedback; however, the revised plans did not adhere to these buffer minimums and continued to propose development within this already reduced buffer area.

After further research in response to the Applicant's updated submittals and, while Commission staff and the Applicant were in further discussions regarding the ESHA and wetland buffers, interested parties provided information documenting the presence of California red-legged frog in the watercourse area. California red-legged frog (*Rana draytonii*; "CRLF") is a California special-status species and a federally-listed threatened species due to loss and degradation of habitat, predation, and human disturbance. CRLF are known to occur in San Pedro Creek, which is connected to the unnamed watercourse by a culvert on the northern end of the parcel, near the arroyo willows. As such, Dr. Garske-Garcia, along with consulting reports that she reviewed, considered the site in question to have moderate potential for CRLF upland habitat and watercourse use, which extends the full length of the property along the western edge (see Exhibit 5). However, Dr. Garske-Garcia also recognized the degraded state of the undeveloped San Pedro Avenue site and adjacent watercourse as relatively unfavorable when compared to nearby habitats, and no published record had appeared documenting CRLF at this location.

Subsequently, Commission staff received documentation from multiple Pacifica residents, including from a San Francisco State University ecologist, in April 2020 demonstrating positive observation of more than one CRLF, including time-stamped photographs from various dates in April showing as many as five CRLF at the same location at one time (see Exhibit 9). In addition, Commission staff received letters written by local biologist Peter Baye (dated May 4, 2005 and July 7, 2014) that report ongoing observations of CRLF at the location over a sustained period of time (see Exhibits 7 and 8).

Altogether, this evidence points to the watercourse area adjacent to the San Pedro Avenue site as being used by CRLF more than just a single frog passing through, and the information provided to the City of Pacifica and the CCC indicates that undeveloped San Pedro Avenue site is used as CRLF aquatic and/or dispersal habitat. While the Applicant's consultant argued that the location is unlikely to provide "consistent, stable long-term habitat for [CRLF] over time," CRLF does not have to carry out its full life cycle in the watercourse area itself for the area to have ecological value for this sensitive species.

Dr. Garske-Garcia consulted with California Department of Fish and Wildlife (CDFW) and U.S. Department of Fish and Wildlife (USFWS) on this matter, and CDFW confirmed that the information received by the CCC in April was valid, including the species identification. USFWS did not have the 2005 Peter Baye record available digitally but indicated it was likely available in their hard files; however, USFWS staff was not surprised by the recent observations and provided information on recent CRLF observations from nearby San Pedro Creek.

In short, the watercourse running adjacent to the San Pedro Avenue site constitutes part of a larger habitat corridor for CRLF. In addition, the watercourse adjacent to the San Pedro Avenue site likely also supports several other species as a habitat corridor, as it remains green throughout the seasons and compared to adjacent parcels, and connects to San Pedro Creek, the shore, the Pacific Ocean, a large open space to the west, and a major forested area. Although there have been recent development encroachments, the watercourse provides a connection across the landscape capable of supporting species including birds and small mammals. The Coastal Commission consistently finds this type of important and vulnerable habitat to be an ESHA due to the rarity of the physical habitat and its important ecosystem functions, including that of support for sensitive species, as found in this case by Dr. Garske-Garcia. Thus, the drainage channel adjacent to this site is considered ESHA under the Coastal Act. In addition, per Dr. Garske-Garcia's advice (see Exhibit 11, Page 11), Commission staff also concluded that the arroyo willow thicket, as well as the small-fruited bulrush marsh both constitute ESHA, and would recommend a buffer of 50 feet at these locations as well.

Coastal Act Section 30240 and LUP Policy 18 prohibit non-resource dependent development within ESHA, prohibit any development in ESHA that would significantly disrupt habitat values, and prohibit any development in areas adjacent to ESHA that would significantly degrade those ESHA areas. In addition, Coastal Act Section 30231 protects the biological productivity of coastal streams and wetlands.

According to Lief Gould, the USFWS biologist for this region, the USFWS would typically recommend a 300-foot dispersal corridor around similar occupied CRLF habitat. Considering all this and applying a 300-foot corridor (i.e., where the area within the corridor constitutes ESHA due to its CRLF habitat functions), Dr. Garske-Garcia determined that the subject property is all ESHA, and that no level of precaution could avoid the loss of habitat with the proposed project. Even if the 300-foot corridor were centered on the watercourse, it would extend across and beyond the subject parcel. In addition, Dr. Garske-Garcia believes that the 300-foot corridor is the minimum that is acceptable for protecting this ESHA as required by the Coastal Act and that a reduced corridor width is not appropriate. The undeveloped San Pedro Avenue site is in ESHA, is development which is not a resource-dependent, would significantly disrupt habitat values. As a result, development of undeveloped San Pedro Avenue site was found inconsistent with Coastal Act Section 30240. In addition, and for similar reasons, the proposed project is also inconsistent with Coastal Act Section 30231 and 30233.

In short, the portion of the San Pedro Avenue site within the Commission's permitting jurisdiction is all ESHA and undevelopable for the proposed range of uses and structures. Although some provisions in the LCP allow for reductions to habitat buffers in the event that the buffer renders the site undevelopable, in this case it is the actual ESHA area that is affected by development (and not the buffer from it), and the City has approved development in the portion of the property that is within its jurisdiction and subject to the LCP. The CCC found that there is no location on the part considered in undeveloped San Pedro Avenue for development, outside of ESHA and sufficient to protect the habitat, as required by the Coastal Act. And, as such, there aren't siting and design conditions available to the Commission to correct this Coastal Act inconsistency. Therefore, the CCC found the proposed project inconsistent with the Coastal Act's sensitive habitat protection requirements cited above, requiring project denial.

At this point however, these buffer recommendations are moot since the entirety of the site constitutes ESHA and are constrained regarding allowable development because of that determination.

Considering all of the facts present, I hereby request that the City of Pacifica correct and update its relevant documents in the LCLUP before the Commission moves forward on the Update. Decision makers and the Public need the LCLUP Update to accurately reflect what is currently known about the location and designation of places with Sensitive and Critical Habitat and Potential Environmentally Sensitive Habitat Areas. Especially, as it relates to the undeveloped lands and waterway adjacent to San Pedro Avenue in Pedro Point.

Respectfully,

William "Leo" Leon
Anne "Kris" Geiger
111 Olympian Way
Pacifica CA 94044

Attachments

Figures: 3.7.3 & 7.3 Sensitive and Critical Habitat
Figure 4.3 ESHA LCLUP,
F16a CCC Report,
CCC Report Exhibits: 5, 6, 7, 8, 9, 11
Email, August 16, 2021 CRLF

DATE: March 2, 2022

To: Christian Murdock, AICP
Deputy Director of Planning
City of Pacifica Planning Department
540 Crespi Drive, Pacifica, CA 94044

RE: City of Pacifica General Plan Update (GPU) and Local Coastal Land Use Plan (LCLUP) and 2022 Draft EIR for the GPU Comments

Dear Mr. Murdock, I am writing to point out specific areas where information in the LCLUP and General Plan Update are inconsistent and/or missing, and need to be corrected for the public and decision makers to understand the impacts of the Project.

1. Sensitive and Critical Habitat

- GPU Figure 7-3, Potential Environmentally Sensitive Habitat Areas
- 2022 Draft EIR Figure 3.7-3 Sensitive and Critical Habitat
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2. Inconsistencies:

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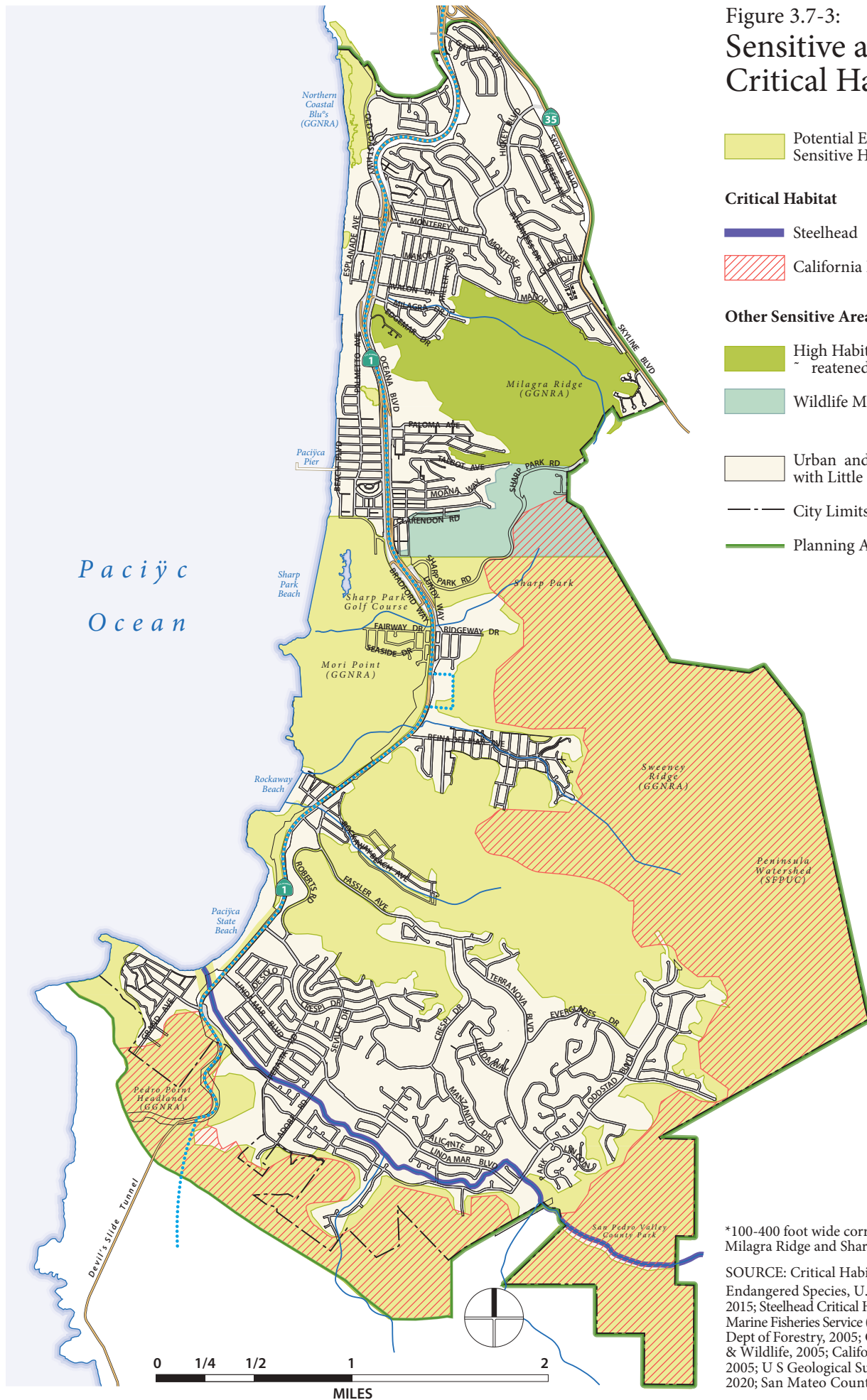
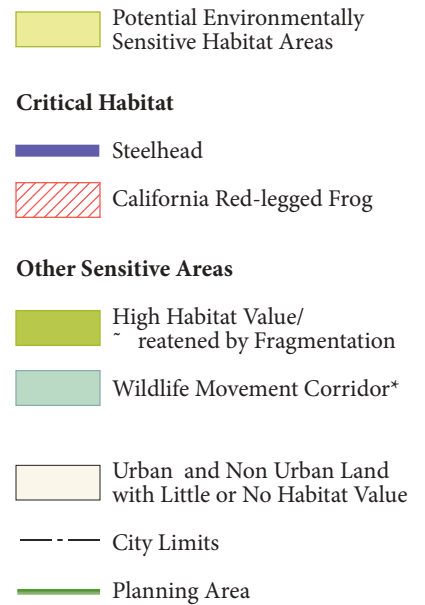
Respectfully,

William “Leo” Leon
111 Olympian Way
Pacifica CA 94044

Attachments

Figures: 3.7.3 & 7.3 Sensitive and Critical Habitat
Figure 4.3 ESHA LCLUP,
F16a CCC Report,
CCC Report Exhibits: 5, 6, 7, 8, 9, 11
Email, August 16, 2021 CRLF

Figure 3.7-3:
Sensitive and
Critical Habitat



*100-400 foot wide corridor needed between Milagra Ridge and Sharp Park/Sweeney Ridge

SOURCE: Critical Habitat for reatened & Endangered Species, U.S. Fish & Wildlife Service, 2015; Steelhead Critical Habitat - Coast, National Marine Fisheries Service (NOAA), 2005; California Dept of Forestry, 2005; California Dept of Fish & Wildlife, 2005; California Native Plant Society, 2005; U S Geological Survey, 2005; City of Pacifica, 2020; San Mateo County, 2020; Dyett & Bhatia, 2020.

Figure 7-3: Sensitive and Critical Habitat

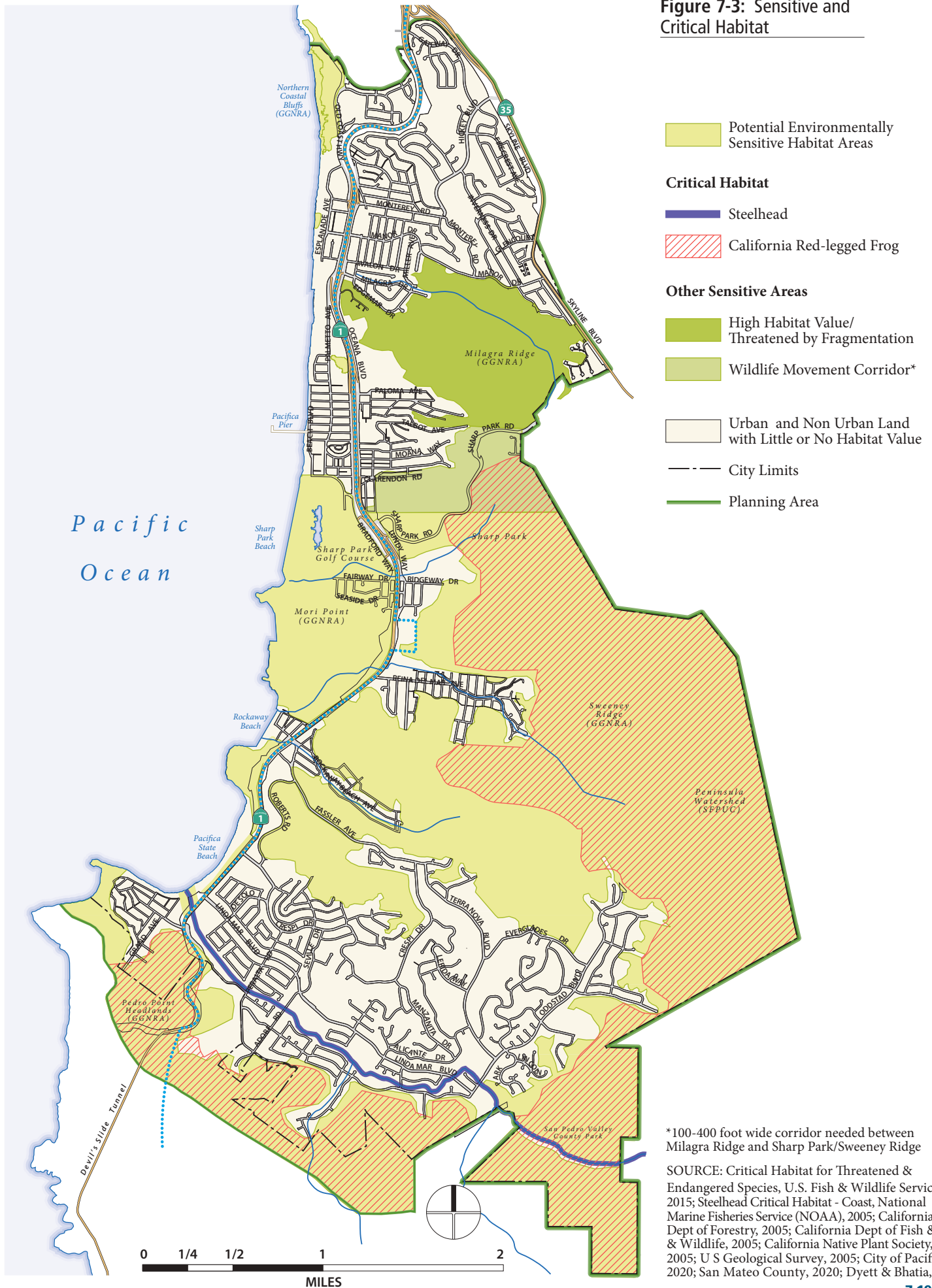
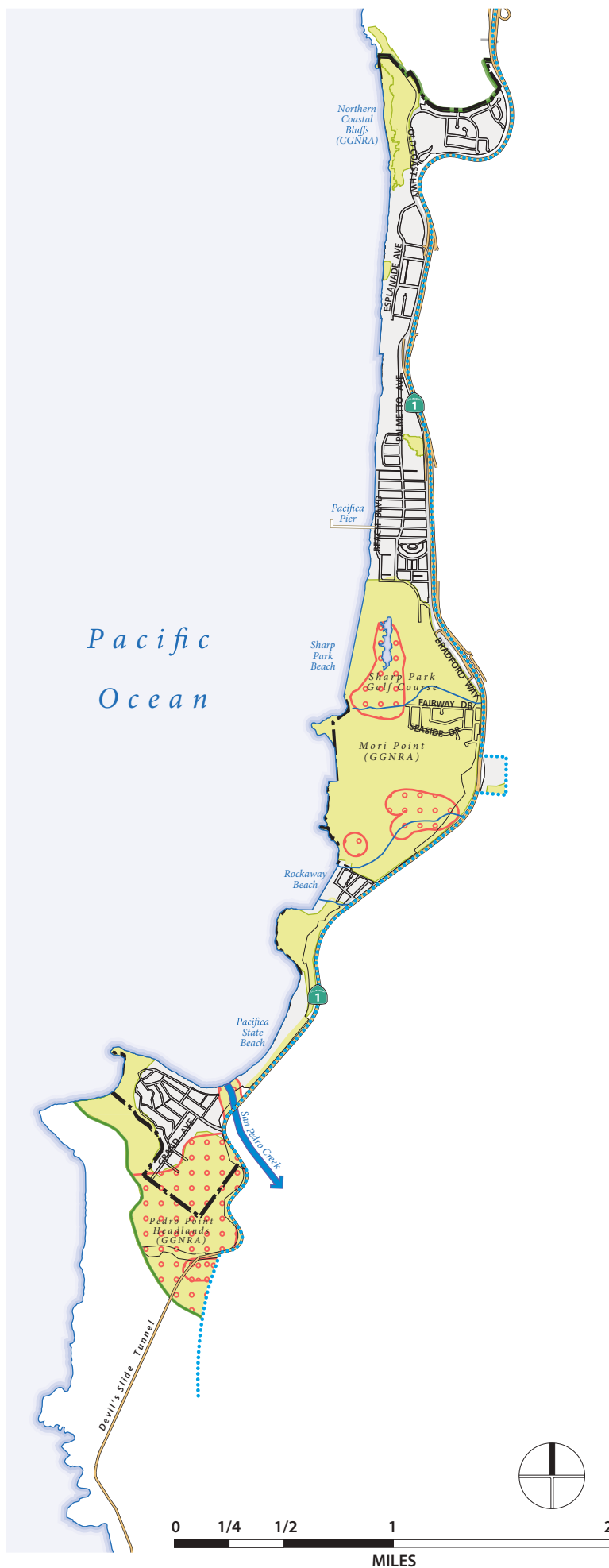


Figure 4-3:
Potential
Environmentally
Sensitive Habitat
Areas



Note: The preliminary delineation of ESHA boundaries does not include an exhaustive compilation of the habitat areas that meet the ESHA definition. Site-specific biological evaluations and field observations shall be required to identify ESHAs and other special status resources that may not have been included in the literature and database review.

SOURCE: U.S. Fish & Wildlife Service 2019; National Marine Fisheries Service, 2019; National Park Service, 2009; USDA Forest Service, 2017; California Natural Diversity Database, 2019; California Native Plant Society, 2019; California Dept of Fish & Game, 2019; FEMA, 2017; ESA, 2008; City of Pacifica, 2019; San Mateo County, 2019; Dyett & Bhatia, 2019.

CALIFORNIA COASTAL COMMISSION

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F16a

Filed:	12/7/2020
Action Deadline:	6/5/2021
Staff:	JKN-SF
Staff Report:	2/18/2021
Hearing Date:	3/12/2021

STAFF REPORT CDP APPLICATION

Application Number: 2-19-0026

Applicant: Shawn Rhodes

Project Location: Undeveloped property located west of the Pedro Point Shopping Center and northeast of San Pedro Avenue (505 San Pedro, APN 023-072-010) in the City of Pacifica.

Project Description: Construction of a mixed-use commercial and residential development including: (1) a 6,475-square foot two-story building with a surf shop on the first floor, office and storage space on the second floor, and a 3,500-square foot basement for storage; (2) a 3,010-square foot two-story building for storage and surf board shaping; and (3) a 3,346-square foot two-story building with retail on the first floor and two residential units on the second floor; (4) a 4,730-square foot skate park; (5) a 24-car parking lot; and (6) related development.

Staff Recommendation: Denial

SUMMARY OF STAFF RECOMMENDATION

The Applicant proposes to construct a mixed-use commercial and residential development on a 37,538 square-foot parcel on San Pedro Avenue, west of Highway 1 and south of Pacifica State Beach. Specifically, the proposed development would include a 6,475 square-foot two-story surf shop with office, storage space and basement (building #1); a 3,010 square-foot two-story building for storage and surf board shaping (building #2); a 3,346 square-foot two-story mixed-use building with retail on the first floor and two residential units on the second floor (building #3); a skate park;

Coastal Commission CDP Application

Two of the proposed buildings (Buildings #1 and #2) and the skate park are located within the Commission's jurisdiction. As referenced on the project plans, Building #1, the northernmost building, would be set back approximately 15 feet from the western property line and ranging between approximately 60-100 feet from the northern property line, with the proposed building footprint extending into the arroyo willow thicket. Building #1 is a proposed 6,475 square-foot two-story building with a surf shop on the first floor, office and storage space on the second floor, and a 3,500 square-foot basement for additional storage space. The proposed 4,730 square-foot skate park would be immediately adjacent to the southern end of Building #1 and would be both fenced and roofed. It is proposed to be set back approximately 10 feet from the western property line. Building #2, at the southern end of the skate park, is a proposed 3,010 square-foot two-story building intended to be used for additional storage and surf board shaping, set back approximately 10 feet from the western property line and adjacent to the 24-car parking lot. The Applicant also proposes a paved pedestrian pathway fronted by a retaining wall immediately adjacent to and along the full extent of the western property line, spanning both the City and Coastal Commission jurisdictions, which would connect San Pedro Avenue to an existing coastal access pathway from the northern end of the Pedro Point Shopping Center to Pacifica State Beach. See **Exhibit 3** for the proposed project plans.

D. Standard of Review

As noted above, this proposed project spans both Coastal Commission and City of Pacifica CDP jurisdictions. The standard of review for the portion of the proposed development within the Coastal Commission's permitting jurisdiction (i.e., the subject of this CDP application) is the Chapter 3 policies of the Coastal Act, although the Commission may also consider the policies of the City of Pacifica's certified LCP as non-binding guidance.

E. Biological Resources

Applicable Coastal Act Provisions

The Coastal Act provides protection for sensitive habitat areas, including those that are considered to be on and offshore marine resources, wetlands, and environmentally sensitive habitat areas (ESHAs), including as follows:

30107.5. *"Environmentally sensitive area" means 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.*

30231. *The biological productivity and the quality of coastal waters, streams, wetlands, estuaries, and lakes 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*

2-19-0026 (Rhodes Mixed-Use Development)

waterflow, encouraging waste water reclamation, maintaining natural vegetation buffer areas that protect riparian habitats, and minimizing alteration of natural streams.

30233.

(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.*

(b) Dredging and spoils disposal shall be planned and carried out to avoid significant disruption to marine and wildlife habitats and water circulation. Dredge spoils suitable for beach replenishment should be transported for these purposes to appropriate beaches or into suitable longshore current systems.

(c) In addition to the other provisions of this section, diking, filling, or dredging in existing estuaries and wetlands shall maintain or enhance the functional capacity of the wetland or estuary. (...)

(...)

2-19-0026 (Rhodes Mixed-Use Development)

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.*

LCP Policy Guidance

The City of Pacifica LCP emphasizes the Coastal Act's protections for wetlands and environmentally sensitive habitat areas and provides additional guidance on the creation of buffers from such sensitive habitat areas, and allowable uses within buffer areas, including as follows:

LUP Page C-99. *A wetland is defined as land where the water table is at, near, or above the land surface long enough to promote the formation of hydric soils or to support the growth of hydrophytes. In certain types of wetlands, vegetation is lacking and soils are poorly developed or absent. Such wetlands can be recognized by the presence of surface water or saturated substrate at some time during each year and their location within, or adjacent to, vegetated wetlands or deep water habitats.*

LUP Policy 18. *Environmentally sensitive habitat areas shall be protected against any significant disruption of habitat values, and only uses dependent on such resources shall be allowed within such areas. 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 such areas, and shall be compatible with the continuance of such habitat areas.*

IP 9-4.4302 Definitions. ... (f) *"Buffer" shall mean an area of land adjacent to primary habitat, which may include secondary habitat as defined by a qualified biologist or botanist, and which is intended to separate primary habitat areas from new development in order to ensure that new development will not adversely affect the San Francisco garter snake and wetlands habitat areas.*

IP Section 9-4.4403 Habitat Preservation. (a) *Intent. The provisions of this section shall apply to all new development requiring a coastal development permit in the CZ District and shall be subject to the regulations found in Article 43, Coastal Zone Combining District. The intent of these provisions is to protect, maintain, enhance and restore the following types of environmentally sensitive habitat as identified in the LCP Land Use Plan...*

(c) *Survey Contents. All habitat surveys shall include, at a minimum, the following information: ...*

(4) *Delineation of all wetlands, streams, and water bodies;*

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(5) Direct and indirect threats to habitat resulting from new development;

(6) Delineation of the secondary habitat buffer area to be provided along the periphery of the primary habitat; and

(7) Mitigation measures to reduce impacts and to allow for the long-term maintenance of environmentally sensitive habitats.

(e) Development Standards for Wetlands and Wetland Buffer Areas. The following minimum standards shall apply to a wetlands and wetlands habitat area.

(1) No new development shall be permitted within a recognized wetlands habitat area;

(2) Limited new development may be permitted within a recognized wetlands habitat buffer area subject to the following standards: ...

(iv) Public access through wetlands shall be limited to low-intensity recreational, scientific, or educational uses. Where public access is permitted, it shall be strictly managed, controlled, and confined to designated trails and paths as a condition of project approval;

(v) Alteration of the natural topography shall be minimized;

(vi) Runoff and sedimentation shall not adversely affect habitat areas;

(vii) Alteration of landscaping shall be minimized unless the alteration is associated with restoration and enhancement of wetlands; ...

(ix) New development adjacent to the buffer shall not reduce the biological productivity or water quality of the wetlands due to runoff, noise, thermal pollution, or other disturbances;

(x) All portions of the buffer shall be protected pursuant to Section 9-4.4308, Permanent Environmental Protection;

(xi) Potential impacts identified in the habitat survey shall be mitigated to a level of insignificance where feasible; and

(xii) Mitigation measures identified in the habitat survey shall be considered and made conditions of project approval where necessary to mitigate impacts

(3) In the event that new development is not possible because the size of the buffer has rendered the site undevelopable, the buffer may be reduced in width if it can be demonstrated that a narrower buffer is sufficient to protect

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the habitat and new development may be permitted subject to standards established in (e)(2) above.

*IP Section 9-4.4308 Permanent Environmental Protection. (b) Findings. The Director, the **Planning Commission**, or the **City Council** may determine that the proposed development is required to include a continuous and binding land use restriction through either a deed restriction, easement, offer of dedication, or other conveyance, as a condition of project approval based on any of the following findings: ... (2) Such a restriction is necessary to protect sensitive coastal resources, including environmentally sensitive habitat, open space, and view corridors...*

Analysis

Both the Coastal Act and the LCP, as guidance, emphasize the need to protect sensitive habitats within the coastal zone, including wetlands and environmentally sensitive habitat areas (ESHAs). In communication with the City of Pacifica, Coastal Commission staff expressed concerns going back over a decade with regard to potential impacts of development on the habitats located on and adjacent to the subject site, indicating that any proposed development should consider measures to avoid or reduce potential impacts on the adjacent unnamed watercourse, which most likely would meet the one-parameter definition of wetlands under the Coastal Act, and stating that a one-parameter wetland delineation should be conducted (see comments in **Exhibit 6**).

Despite the recommendation to conduct a one-parameter wetland delineation at an earlier stage in the process, a delineation of the site and adjacent drainage channel was not prepared for this project until November 2019, after the City of Pacifica had already approved a local CDP for the portion of the project located in their CDP jurisdiction.⁵ This delineation showed that the adjacent watercourse that runs along the western edge of the subject property constitutes areas of both federal and state wetlands, with the state wetlands spanning the full length of the watercourse, thus comprising the entire length of the subject property's western boundary. On the northern end of the property, the federal and state wetlands encompass an approximately 0.096-acre arroyo willow thicket that partially extends onto the subject property and takes up approximately 0.048-acres at the northern border of the subject property (see delineation of these features in **Exhibit 5**). The federal and state wetlands present onsite include arroyo willow thicket, perennial rye grass fields, small-fruited bulrush marsh, smartweed patch, the flow channel, and the wetted watercourse channel.

During an initial assessment of the project-related biological information, Commission staff ecologist Dr. Lauren Garske-Garcia identified for the Applicant that the Commission typically applies a minimum wetland buffer of 100 feet. Examining the site-specific circumstances associated with the property known at that time, Dr. Garske indicated that the minimum possible justifiable wetland buffer, if appropriately mitigated,

⁵ The delineation was prepared for the Applicant by Coast Ridge Ecology, LLC as part of the CDP application to the Coastal Commission.

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would be 50 feet from the edge of the arroyo willow thicket and 25-feet from the remainder of the state wetlands that comprise the entire length of the drainage channel along the property's western edge. The Applicant submitted revised plans in response to this feedback, however, the revised plans did not adhere to these buffer minimums and continued to propose development within this already reduced buffer area. After further research in response to the Applicant's updated submittals and, while Commission staff and the Applicant were in further discussions regarding the ESHA and wetland buffers, interested parties provided information documenting the presence of California red-legged frog in the watercourse area.

California red-legged frog (*Rana draytonii*; "CRLF") is a California special-status species and a federally-listed threatened species due to loss and degradation of habitat, predation, and human disturbance. CRLF are known to occur in San Pedro Creek, which is connected to the subject watercourse by a culvert on the northern end of the parcel, near the arroyo willows. As such, Dr. Garske-Garcia, along with consulting reports that she reviewed, considered the site in question to have moderate potential for CRLF upland habitat and watercourse use, which extends the full length of the property along the western edge (see **Exhibit 5**). However, Dr. Garske-Garcia also recognized the degraded state of the subject parcel and adjacent watercourse as relatively unfavorable when compared to nearby habitats, and no published record had appeared documenting CRLF at this location. Subsequently, Commission staff received documentation from multiple Pacifica residents, including from a San Francisco State University ecologist, in April 2020 demonstrating positive observation of more than one CRLF, including time-stamped photographs from various dates in April showing as many as five CRLF at the same location at one time (see **Exhibit 9**). In addition, Commission staff received letters written by local biologist Peter Baye (dated May 4, 2005 and July 7, 2014) that report ongoing observations of CRLF at the location over a sustained period of time (see **Exhibits 7 and 8**).

Altogether, this evidence points to the watercourse area as being used by CRLF more than just a single frog passing through, and the information provided and reviewed indicates that the area is used as CRLF aquatic and/or dispersal habitat. While the Applicant's consultant argues that the location is unlikely to provide "consistent, stable long-term habitat for [CRLF] over time," CRLF does not have to carry out its full life cycle in the watercourse area itself for the area to have ecological value for this sensitive species. Dr. Garske-Garcia consulted with California Department of Fish and Wildlife (CDFW) and U.S. Department of Fish and Wildlife (USFWS) on this matter, and CDFW confirmed that the information received by the Commission in April was valid, including the species identification. USFWS did not have the 2005 Peter Baye record available digitally but indicated it was likely available in their hard files; however, USFWS staff was not surprised by the recent observations and provided information on recent CRLF observations from nearby San Pedro Creek.

In short, the watercourse running adjacent to the subject parcel constitutes part of a larger habitat corridor for CRLF. In addition, the watercourse likely also supports several other species as a habitat corridor, as it remains green throughout the seasons and compared to adjacent parcels, and connects to San Pedro Creek, the shore, the Pacific

2-19-0026 (Rhodes Mixed-Use Development)

Ocean, a large open space to the west, and a major forested area. Although there have been recent development encroachments, the watercourse provides a connection across the landscape capable of supporting species including birds and small mammals. The Coastal Commission consistently finds this type of important and vulnerable habitat to be an ESHA due to the rarity of the physical habitat and its important ecosystem functions, including that of support for sensitive species, as found in this case by Dr. Garske-Garcia. Thus, the drainage channel adjacent to this site is considered ESHA under the Coastal Act. In addition, per Dr. Garske-Garcia's advice (see **Exhibit 11**, page 11), Commission staff also concludes that the arroyo willow thicket, as well as the small-fruited bulrush marsh both constitute ESHA, and would recommend a buffer of 50 feet at these locations as well⁶.

Coastal Act Section 30240 and LUP Policy 18 prohibit non-resource dependent development within ESHA, prohibit any development in ESHA that would significantly disrupt habitat values, and prohibit any development in areas adjacent to ESHA that would significantly degrade those ESHA areas. In addition, Coastal Act Section 30231 protects the biological productivity of coastal streams and wetlands. According to Lief Gould, the USFWS biologist for this region, the USFWS would typically recommend a 300-foot dispersal corridor around similar occupied CRLF habitat. Considering all this and applying a 300-foot corridor (i.e., where the area within the corridor constitutes ESHA due to its CRLF habitat functions), Dr. Garske-Garcia determined that the subject property is all ESHA, and that no level of precaution could avoid the loss of habitat with the proposed project. Even if the 300-foot corridor were centered on the watercourse, it would extend across and beyond the subject parcel. In addition, Dr. Garske-Garcia believes that the 300-foot corridor is the minimum that is acceptable for protecting this ESHA as required by the Coastal Act and that a reduced corridor width is not appropriate. The proposed development in ESHA is not a resource-dependent use and it would significantly disrupt habitat values. As a result, the proposed project is inconsistent with Coastal Act Section 30240. In addition, and for similar reasons, the proposed project is also inconsistent with Coastal Act Section 30231 and 30233.

In short, the portion of the site within the Commission's permitting jurisdiction is all ESHA and undevelopable for the proposed range of uses and structures. Although some provisions in the LCP allow for reductions to habitat buffers in the event that the buffer renders the site undevelopable, in this case it is the actual ESHA area that is affected by development (and not the buffer from it), and the City has approved development in the portion of the property that is within its jurisdiction and subject to the LCP. The Commission finds that there is no location on the site that is outside of ESHA and sufficient to protect the habitat, as required by the Coastal Act. And, as such, there aren't siting and design conditions available to the Commission to correct this Coastal Act inconsistency. Therefore, the Commission finds the proposed project inconsistent with the Coastal Act's sensitive habitat protection requirements cited above, requiring project denial.

⁶ At this point however, these buffer recommendations are moot since the entirety of the site constitutes ESHA and are constrained regarding allowable development because of that determination.

Re: Endangered Species & Habitat, Photo Link

William.Leo Leon <leoleonimages@outlook.com>

Mon 8/16/2021 4:51 PM

To: Woodhouse, Kevin <kwoodhouse@pacificacounty.gov>; Wehrmeister, Tina <twehrmeister@pacificacounty.gov>; Sue Vaterlaus <vaterlauss@ci.pacificacounty.ca.us>

Cc: Murdock, Christian <cmurdock@pacificacounty.gov>; Bigstyk, Tygarjas <bigstykct@ci.pacificacounty.ca.us>; Ray Donguines <donguinesr@ci.pacificacounty.ca.us>

Bcc: Cherie Chan <chan.cherie@gmail.com>; Carlos Davidson <carlosdavidson7@gmail.com>; Brian Gaffney <briangaf@gmail.com>; Kris Geiger <kgeiger08@gmail.com>

Hello Mr. Woodhouse, Honorable Mayor Vaterlaus and All,

I am writing to inform you of good news and a matter of concern. The good news, this Sunday August 15, 2021 while walking on San Pedro Avenue, I found and photographed a population of adult Red-legged frogs and Red-legged frog Tadpoles in a small pond that is located between the Calson Field Property and Hauling Way. The concern I have, there is no protective barrier and it is near a busy street.

I understand this body of water and its wetlands was the subject of a recent project considered by the California Coastal Commission. It is situated near and behind Pedro Point Shopping Center and abuts San Pedro Avenue to the South. Post and cable systems are in use in sensitive habitat areas at various places in Pacifica. This area is compact and, in my opinion, would benefit from a simple barrier.

I am willing to donate the cost of materials for the installation of a Post and Cable barrier. Please consider my offer and let me know what the City of Pacifica can do to protect this valuable biological resource and endangered species.

Here's a link to the photos:  [Pedro Point Pond, San Pedro Ave. Aug 15, 2021](#)

Respectfully, Leo

William Leo Leon
111 Olympian Way
cell 415-570-1855

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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 daylight 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

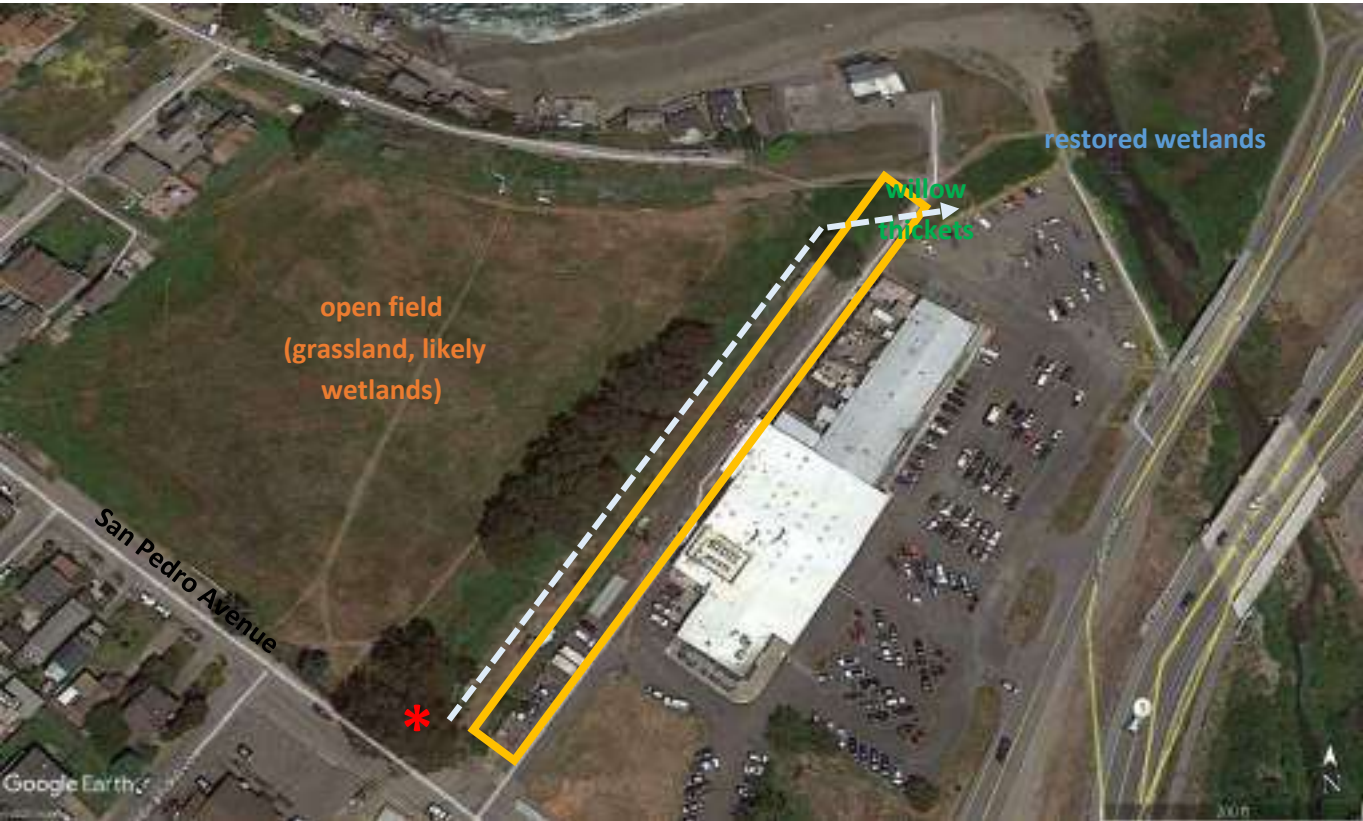
³¹ Spencer, WD, P Beier, K Penrod, K Winters, C Paulmann, H Rustigian-Romsos, J Strittholt, M Parisi and A Pettler. 2010. California Essential Habitat Connectivity Project: A Strategy for Conserving a Connected California. Prepared for California Department of Transportation and California Department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







Figure 5: Delineated single-parameter wetlands (solid green lines) and approximate wetland buffers (dashed green lines) relative to proposed project. Note that 50-ft buffer was drawn around the willow ESHA but should also extend slightly further south around some small-fruited bulrush marsh ESHA, which would further overlap with the proposed footprint, even as potentially modified (red lines).

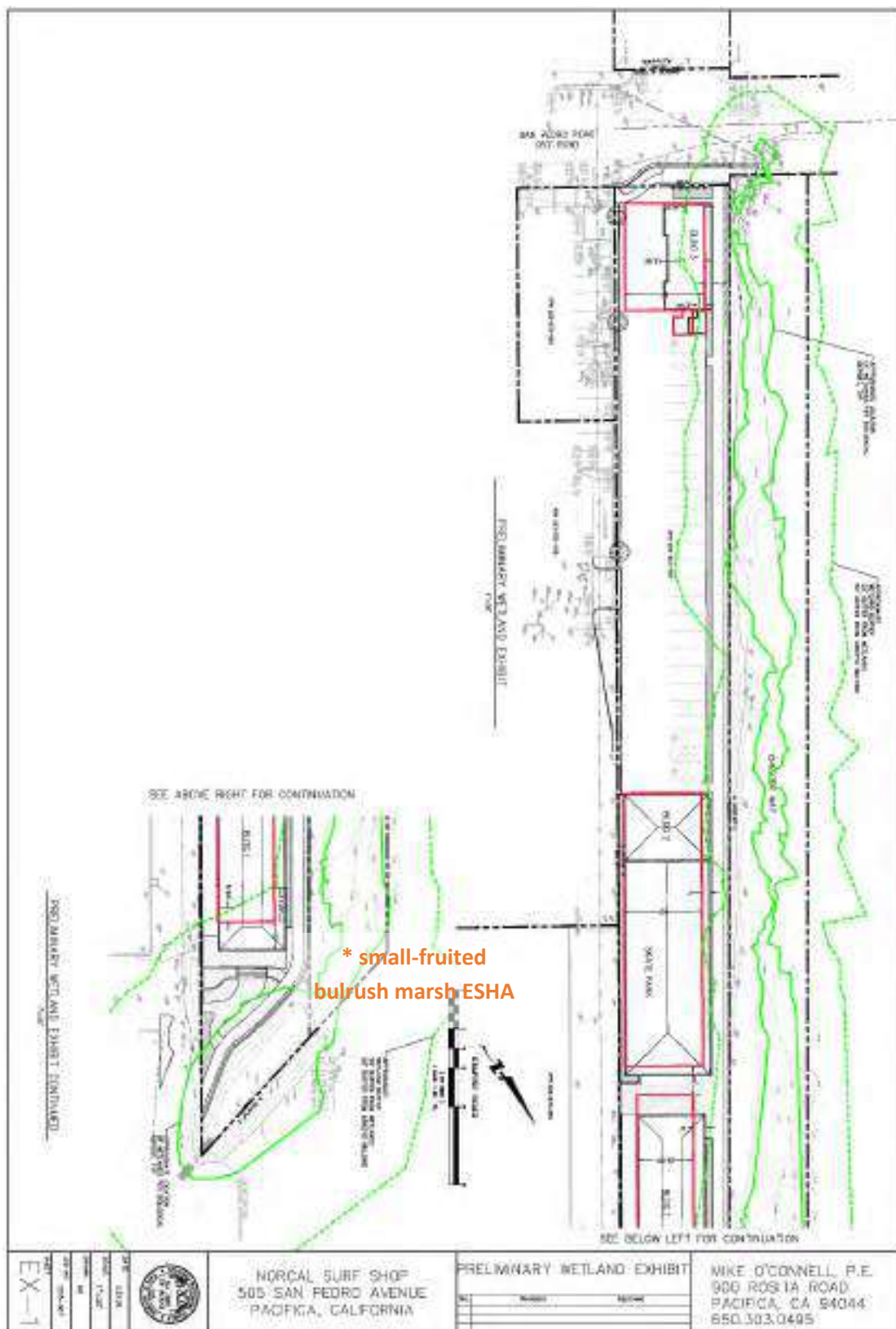


Figure 6a: CRLF as observed at San Pedro Avenue on April 12, 2020 by Michael Vasey, Sheila Harman and Jon Harman (photo credit: Jon Harman); **b-d:** CRLF as observed at San Pedro Avenue on April 23, 2020 by Sheila Harman. Individual CRLF circled in white for visibility.



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.

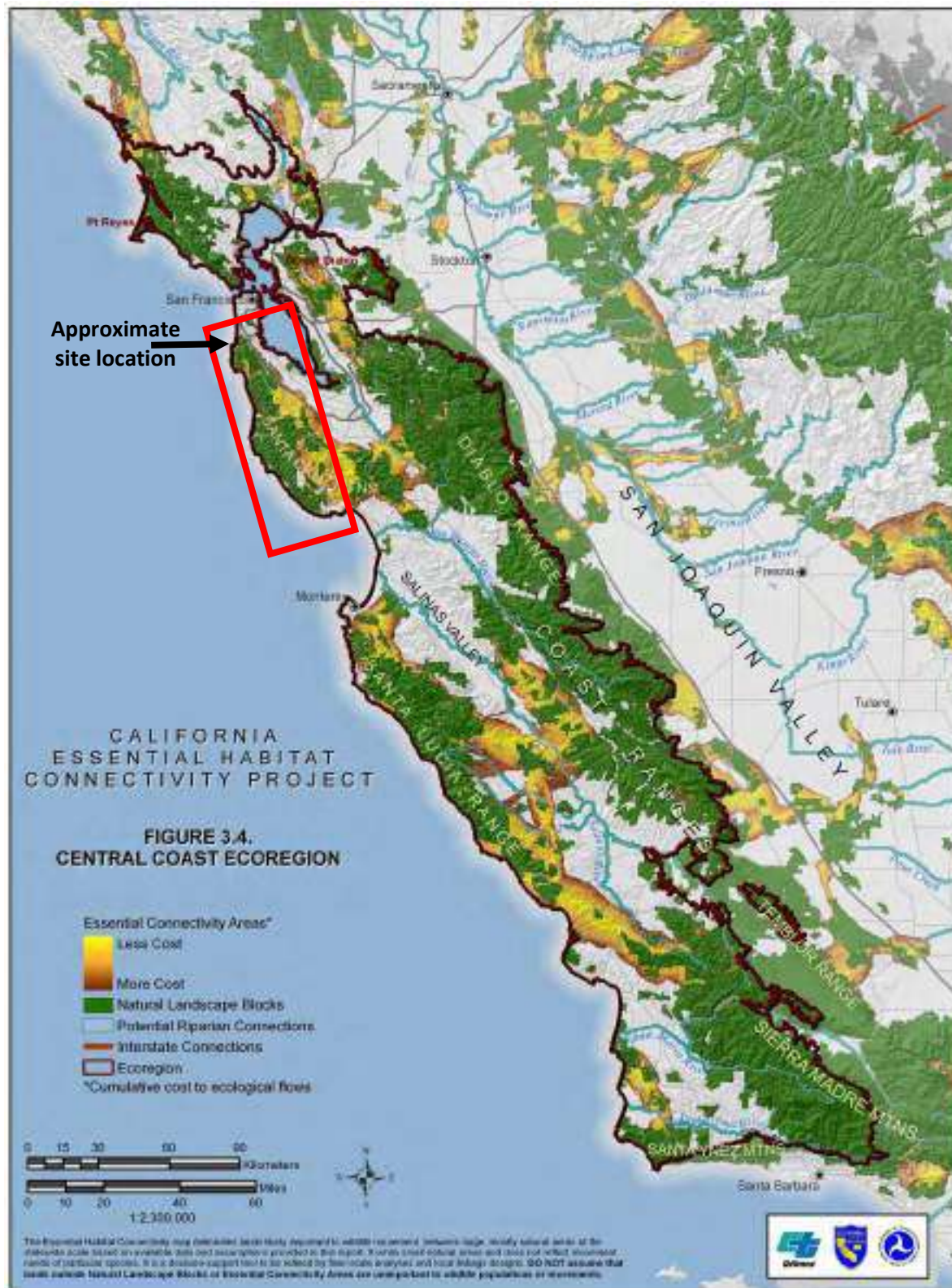


Figure 9: CNDDDB display of the Pedro Point area in Pacifica, with CRLF occurrences observed in thatched red areas and finer-scale features identified as particularly valuable by the California Essential Habitat Connectivity Project in solid green. The proposed project site (yellow bar) is largely covered by the upper two CRLF occurrences and is situated to link multiple habitats across the landscape mosaic, including riparian, wetland, forest, and grassland.



California Red-legged Frog in drainage channel adjacent to Calson field – April 12, 2020

Photo by Jon Harman in presence of Jon, Sheila Harmon, and Michael Vasey







04 23 2020



Subject: Fw: Red-legged Frogs
Date: Sunday, December 20, 2020 at 9:35:48 AM Pacific Standard Time
From: Stan Zeavin
To: KoppmanNorton, Julia@Coastal
Attachments: 20200519_1669.jpg, 20200519_1687.jpg, 20200519_1683.2.jpg, 20200519_1675.2.jpg, 20200519_1697.2.jpg, 20190202_5736.4.jpg

Hi Julia,

FYI, a naturalist friend took the pictures below over on Pedro Point last January after our USFWS winter plover survey at Linda Mar. The last photo with the cypress tree is on the small creek behind the strip mall that drains the entire area. The CRLFs forage west up onto the Calson property at night.

Hoping for some peace and relaxation for you over the holidays. And Happy solstice, too!

Margaret

----- Forwarded Message -----

Subject: Red-legged Frogs

May 19, 2020



2-19-0026







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 artist - naturalist - photographer
 -)/@F6Ã1B=E9



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Lee Diaz
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July 7, 2014

SUBJECT: Draft Environmental Impact Report for The Pacifica General Plan Update Project –
 SCH No. No. #2012022046

Dear Mr. Diaz,

The comments below regarding the Draft Environmental Impact Report for the Pacifica General Plan Update Project (DEIR) are submitted on behalf of the **Pedro Point Community Association**, but represent my independent, best professional judgment.

I have reviewed the DEIR sections relevant to assessment of biological resources, land use policies, and selected relevant portions covering hydrology and geology for CEQA compliance and for LCP amendment compliance with the Coastal Act. I have also conducted site visits of the Pedro Point field (also “undeveloped San Pedro Ave site” and described as “vacant” in the DEIR, General Plan and Local Coastal Plan documents) in all seasons since 2000.

My qualifications to provide expert comments are based on nearly 35 years of professional work in coastal wetland and terrestrial ecology, with over 20 years in San Francisco Estuary wetlands, including long-term direct knowledge of the estuarine wetlands, special-status species, and diked baylands in the project area. A statement of my qualifications is attached hereto as Attachment A.

My comments focus on the potentially adverse environmental impacts of proposed changes in the land use designation of the Pedro Point neighborhood.

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 Pacifica General Plan Update DEIR comments



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Summary of Comments

1. Environmental Baseline: The DEIR provides contradictory information about the vegetation of the Pedro Point field, asserting that it supports “northern coastal scrub”, an upland vegetation type absent in the grassy field, and that it supports wetlands. The field supports seasonal wetlands. The DEIR fails to disclose the importance of these wetlands in terms of the environmental setting of San Pedro Creek mouth wetlands in the Coastal Zone (the field is the last remaining historical floodplain of the lower San Pedro Creek Valley that has not been developed in the Coastal Zone) and the local distribution of ESHA (Environmentally Sensitive Habitat Areas) supporting California red-legged frogs.

2. Biological Impacts to Wetlands and Special-status Species: The DEIR fails to analyze any biological impacts caused by conversion of the existing Pedro Point field to a land use designation of “Coastal Residential Mixed Use development”. The DEIR fails to programmatically assess impacts at a neighborhood-specific level as it did in the 1980 General Plan, and it fails to consider general impacts of residential development on extensive seasonal wetlands and ESHA in and around the field. The proposed land use change for the field is likely to cause significant impacts to wetlands, wildlife, and special-status species for which no feasible mitigation has been identified, and for which no feasible mitigation probably exists.

3. Land Use Impacts. The DEIR fails to analyze land use impacts caused by changing the land use of the field from a general “Commercial” use (1980 General Plan) to a more specific and different “Coastal Residential Mixed Use” designation. This change for the field’s designated land use causes significant impacts (conflicts with) to the City’s own land use policies and numerous Coastal Commission land use policies that cannot be mitigated, and are not mitigated by the vague, programmatic mitigation measures cited in the DEIR.

4. Conclusion. The DEIR fails to disclose important biological resources, and their distribution and relationship to other biological resources and communities in the environmental setting of lower San Pedro Creek. This precludes meaningful public comment and DEIR analysis of significant impacts to biological resources and land use policies that are likely to occur. The DEIR should be recirculated to correct the flawed environmental baseline and defective impact analysis, and should identify reasonable alternatives that either lessen significant impacts, or are otherwise environmentally preferable.

1. Environmental Baseline

The DEIR presents inconsistent and erroneous biological baseline description of the existing conditions of the Pedro Point field and its vicinity. The errors, omissions, and contradictory environmental baseline description results in erroneous conclusions that the project (General Plan) will have no significant biological impacts. Neighborhood-specific assessments of proposed General Plan land use changes are lacking for Pedro Point, its field, and for the DEIR in general.



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Assessment of biological and land use impacts to the Pedro Point neighborhood requires reference to existing *physical and biological* environmental conditions (2014; approximately the time of the EIR's notice of preparation), and the existing *land use* designations from the 1980 General Plan. The existing biological conditions of the Pedro Point field – the last undeveloped lowland open space within the historical floodplain of San Pedro Creek – is inaccurately and inconsistently represented in the DEIR's figures and text. These errors result in underestimation of significant biological impacts, as discussed below.

1.1 Mapped DEIR Wetlands, Vegetation and Habitats – physical and biological baseline

The DEIR provides contradictory and confused (and confusing) information about the existing biological conditions of the Pedro Point field. Figure 3.7-1 (Vegetation; DEIR p. 3.7-3) maps most of the field in the color-code (pale olive green) corresponding with “Northern Coastal Scrub” (an upland vegetation type associated with coastal hillslopes and bluffs), and part of the field color-coded gray as “urban” land use but overlapping with the “wetlands” symbol. This is contradictory and erroneous environmental baseline information. There are in fact *no stands of northern coastal scrub vegetation* at all within or around the Pedro Point field. The shrubs on the railroad berm are ornamental non-native plantings. No part of the field is “urban” cover type, as misrepresented in the figure; *no paved or developed areas with structures exist in the field*. Figure 3.1-1 shows the “Existing land use” color-coded gray as “Vacant/Undeveloped”, which is also inconsistent with “urban” land use, but consistent with “wetlands”. The map also misrepresents mixed ornamental, non-native, and native coastal bluff scrub vegetation northwest of the field as “beach/intertidal” habitat. The two major color-coded map units for the Pedro Point field, “urban” and “northern coastal scrub” are incorrect.

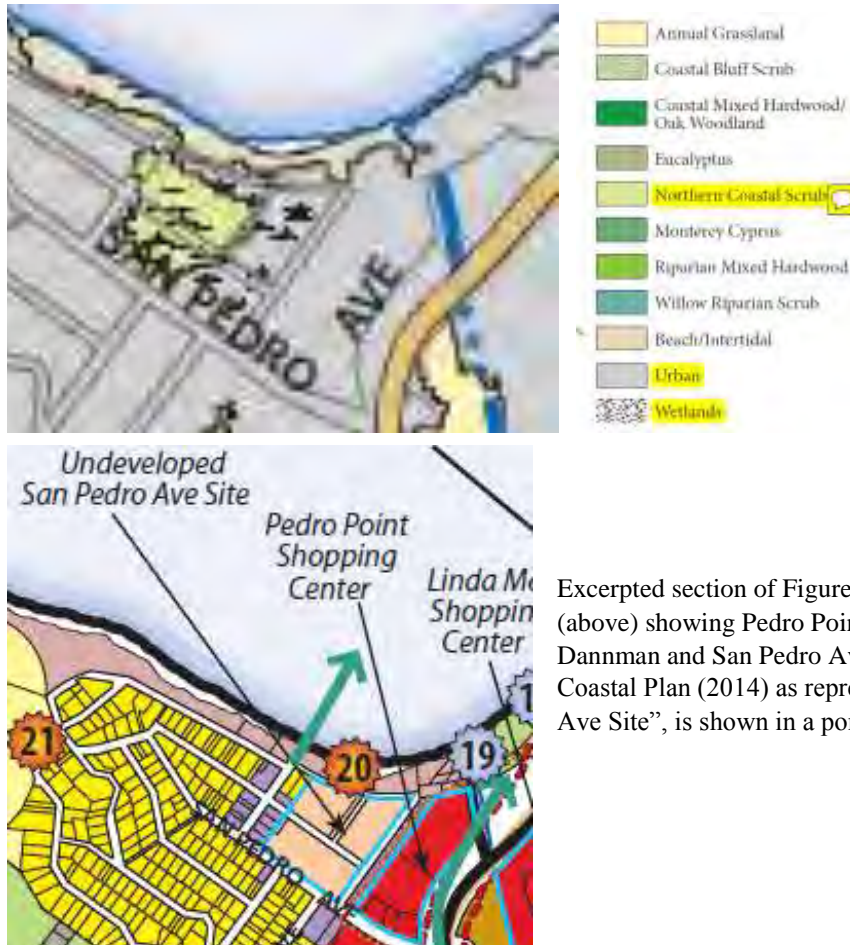


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Excerpted section of Figure 3.7-1 of the DEIR “Vegetation” map (above) showing Pedro Point field with paper streets between Dannman and San Pedro Ave. The setting within the Draft Local Coastal Plan (2014) as represented as “Undeveloped San Pedro Ave Site”, is shown in a portion of Figure 4.8 (left).

Only one map symbol (pattern) for the vacant/undeveloped Pedro Point field in Figure 3.7-1 is accurate: “wetlands” classified by the U.S. Fish and Wildlife Service National Wetlands Inventory at coarse scale, as shown also in DEIR figure 3.7-2. The Pedro Point field itself is dominated by non-native grasses and herbaceous broadleaf plants, including seasonal wetland and non-wetland vegetation. Both maps omit the distinct seasonal and perennial wetlands of the drainage swale at the east end of the field, which drain to San Pedro Creek through a series of culverts. The drainage swale wetlands, the wetland connectivity to San Pedro Creek mouth, and the extensive perennial wetlands (Freshwater Marsh) of San Pedro Creek are entirely missing from the vegetation map of Figure 3.7-1.

Other errors describing habitat and vegetation are evident in the DEIR’s descriptions of existing conditions in the coastal zone. For example, the DEIR confuses coastal strand (beaches and dunes) with coastal bluff scrub, and states that the plant sea-rocket (*Cakile maritima*) is a dominant species of “coastal bluff scrub”. Sea-rocket is a non-native species common on sand beaches and low foredunes (like those



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of Pacifica State Beach), but does not occur at all in coastal bluff scrub in Pacifica or elsewhere, let alone as a dominant species. The description of coastal bluff scrub combines species that simply do not occur together in natural or disturbed environments of Pacifica.

1.2. Wetland classification of the Pedro Point field and vicinity: existing conditions

Based on my recent and past site visits, I know that the existing vegetation of the Pedro Point field consists of predominantly annual and perennial, herbaceous, non-native seasonal wetland and upland grassland vegetation. Seasonal wetland grassland occupies a mosaic of depressions, ditches, and swales. Mesic grassland (seasonally wet but lacking a prevalence of wetland indicator plants) occupies portions of the higher elevation zones of the site, primarily to the southwest corner. The wetland depressions are indicated by seasonally high density of toad rush (*Juncus bufonius*; FACW, facultative-wet indicator in arid west), co-occurring with European ryegrass (*Festuca perenne*; syn. *Lolium perenne*; FAC, facultative wetland indicator in arid west) and buck's-horn plantain (*Plantago coronopus*; FACW, facultative-wet indicator in arid west). Some of the wettest depressions support populations of *Lilaea scilloides* (flowering quillwort). Flowering quillwort is evident only in the wettest years when pools stay flooded for many weeks or months. Accurate wetland plant identification and measurement of the seasonal wetland patches at this site are possible only during winter to spring months. Desiccation, disturbance (trampling, mowing, discing) eliminates or degrades wetland vegetation and precludes accurate identification in fall and summer. Similarly, accurate assessment of wetland hydrology is feasible only during the rainy season, during and within two weeks following major rainfall events.

The USFWS classification of Pedro Point Field wetlands shows wetlands distributed over approximately all of the site, as shown in DEIR Figures 3.7-1 and 3.7-2. Past and current National Wetland Inventory ("NWI") maps consistently apply wetland classifications to approximately all of the field. Two current classifications of the field's wetlands include the codes "PEMah" and "PUSCh", both "palustrine" (freshwater emergent, non-tidal) seasonal, and consistent with the seasonally flooded hydrology associated with surrounding berms. The "U" (unconsolidated shore) probably is associated with intermittent unvegetated (disced, vegetation disturbed) conditions. The NWI wetland mapping of the field broad-brush treatment of prevailing past wetland distribution, but the precision of the NWI wetland *type* boundaries is not precise enough for the DEIR to represent as "existing conditions" in 2014 CEQA assessment. In my professional opinion, "wetlands" meeting the jurisdictional criteria for Coastal Commission ("Commission") policies, and classification as "wetland" under the Cowardin (U.S. Fish and Wildlife Service, USFWS) system, are in fact present and widely distributed over the Pedro Point field today, despite past unauthorized ditching and drainage activities (see wetland history, below).

Despite DEIR's inclusion of NWI mapped wetlands in some figures, the DEIR fails to apply the NWI wetland mapping and classification (as well any current field reconnaissance observations to update or verify them) to any meaningful biological assessment of potential wetland impacts of land use



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designation changes to the field, and assessment of alternatives. The DEIR fails to assess the extent and distribution of the field's seasonal wetlands (meeting Cowardin/California Coastal Commission wetland criteria) in relation to land use changes proposed. The DEIR does not consider the accuracy or distribution of the (old) NWI wetland maps based on existing field conditions. Specifically, the DEIR does not analyze whether the field's wetlands are localized or extensively distributed in the field, so it cannot analyze whether it is even feasible to designate a coastal residential mixed-use development without committing the City's General Plan to significant wetland impacts, in conflict with its own land use policies and Coastal Act policies.

Further, because of the DEIR's omissions about wetland impacts, comparison of alternatives will lack relevant information about feasible land use alternatives that may avoid or minimize wetland impacts, and which may be environmentally preferable. Examples of environmentally preferable alternatives consistent with City and Coastal Act policies include existing "Commercial" land use (with and without "Commercial-Recreation" zoning) compatible with low-intensity visitor-serving commercial recreation/tourism-promoting uses; or "Conservation" - all of which are consistent with City policies for tourism destination, avoidance of natural hazards, wetland conservation, and consistency with recreational, scenic values that Coastal Act policies give priority over residential development.

1.3. Wetland jurisdiction and CEQA

The DEIR cites multiple state and federal wetland jurisdictions. With respect to assessment of *biological* impacts to wetlands, USFWS (NWI, Cowardin wetland classification), California Coastal Act, and California Department of Fish and Wildlife wetland policy definitions are applicable because these are fundamentally based on habitat, hydrogeomorphic features, and ecological functions. In contrast the narrowest federal definition (U.S. Army Corps of Engineers and Environmental Protection Agency; USACE/EPA) under the Clean Water Act is specifically limited to *legal* wetland definition for jurisdiction over authorization of discharges of earthen fill regulated under Section 404 of the Clean Water Act. The USACE/EPA wetland definition contains federal exemptions and policy disclaimers that are not relevant to biological impact assessment under CEQA, and it is a narrower and more exclusive definition that is likely to underestimate the extent of habitat-based or hydrogeomorphic definitions appropriate for impact assessment.

The California Coastal Act Section 30231 defines a wetland as:

...lands within the coastal zone which may be covered periodically or permanently with shallow water and include saltwater marshes, freshwater marshes, open or closed brackish water marshes, swamps, mudflats, and fens.



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Similarly, the Cowardin (USFWS, NWI) wetland classification uses a general broad definition of wetlands:

Wetlands are lands transitional between terrestrial and aquatic systems where the water table is usually at or near the surface or the land is covered by shallow water.

California Coastal Act jurisdictional wetlands criteria in the California Code of Regulations at 14 CCR Section 13577 establish a “one-parameter definition” that only requires evidence of a single wetland parameter to establish wetland conditions, in contrast with federal wetlands criteria under the Clean Water Act:

Wetland shall be defined as land where the water table is at, near, or above the land surface long enough to promote the formation of hydric soils or to support the growth of hydrophytes, and shall also include those types of wetlands where vegetation is lacking and soil is poorly developed or absent as a result of frequent and drastic fluctuations of surface water levels, wave action, water flow, turbidity or high concentrations of salts...

The Commission’s one-parameter definition is similar to the USFWS wetlands criteria, which state that wetlands must have one or more of the following three attributes:

(1) at least periodically the land supports predominantly hydrophytes; (2) the substrate is predominantly undrained hydric soil; and (3) the substrate is nonsoil and is saturated with water or covered by shallow water at some time during the growing season of each year.

In contrast, the U.S. Army Corps of Engineers (USACE) and the Environmental Protection Agency use a three parameter definition for delineating wetlands under Clean Water Act jurisdiction, which is relevant *only in context of USACE permit authorization for discharges of fill in jurisdictional waters* of the United States. The USACE definition is narrower than those of the Coastal Commission (relevant to LCP) and USFWS (relevant to wetland impact assessment under CEQA, not limited to fill discharges and subject to federal exemptions irrelevant to CEQA).

The City’s wetland policies (Land Use; DEIR p. 3.1-21) cite both USACE/EPA and Coastal Commission wetland definitions. CO-I-5, CO-I-6 cites both, and CO-I-8 cites State (CDFW/CCC) wetlands only. The narrower USACE/EPA definition is relevant only to those land use policy elements that specifically cite it in context of wetland fill permits. **The USACE/EPA jurisdictional wetlands are not the proper standard for determining consistency of GPU consistency with Coastal Act wetlands policies, or wetland impacts under CEQA.** This should be corrected in the EIR, or else the EIR will not provide accurate conclusions about Pedro Point field land use impacts regarding wetlands in context of CEQA or Coastal Act policies.

1.4. Special-status species and Environmentally Sensitive Habitat Areas (ESHA): California red-legged frogs (*Rana draytonii*) environmental baseline



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California red-legged frogs (*Rana draytonii*; CRLF) occur in the freshwater marsh drainage swale bordering the Pedro Point Field along its eastern edge. I reported their presence to the U.S. Fish and Wildlife Service Sacramento Fish and Wildlife Office, Endangered Species Program in 2005. If the DEIR preparers had consulted properly with state and federal wildlife agencies, or local residents, about the local distribution of special-status or other wildlife species, this information would have been available to include in the DEIR. The DEIR, however, failed to disclose the local sub-population of CRLF in the drainage swale bordering the field, and its relationship with the population of the lower San Pedro Creek wetland complex.

I have observed adult red-legged frogs are most often observable basking along muddy or prostrate grass banks near the culverts draining San Pedro Avenue at the southeast corner of the field. The perennial moisture in this swale provides year-round hydration habitat for CRLF, as well as foraging and potential breeding habitat. CRLF breeding is indicated by intermittent local population increases in red-legged frogs here, most notably in 2010. Foraging activities of CRLF likely extend to adjacent non-wetland flats (rich in invertebrate prey) in the field during moist, foggy nighttime and early morning conditions. I am not aware of protocol nighttime surveys for California red-legged frog conducted either in the freshwater marsh swale adjacent to the field, or in the field itself. The vicinity of the freshwater marsh swale and field are a complex of foraging, basking, dispersal, and breeding wetland and upland habitat for California red-legged frogs. It thus also meets criteria for Environmentally Sensitive Habitat Areas (ESHA) under California Coastal Commission regulations. The DEIR fails to include this information about CRLF at and in proximity to the field.

In addition, the DEIR fails to analyze the potential adverse, significant impacts to CRLF from the proposed land use changes. Land use designations that would foreseeably increase the intensity of land use, such as the proposed redesignation to allow residential development or other substantial increases in the built environment, may have significant direct and indirect impacts on CRLF. The proposed residential mixed-use development of the field would likely (a) substantially reduce available nocturnal foraging habitat for CRLF (food and prey base impacts to growth and survival); (b) increase contaminant loads in the drainage swale due to runoff from driveways, roads, and backyard sources of pesticides, petroleum hydrocarbons, solvents, and detergents (reproductive impacts); (c) increase peak flow velocities in the swale during major storm runoff events (juvenile mortality impacts).

Not only has the DEIR not assessed such impacts, it has not identified feasible programmatic mitigation measures. Feasible mitigation for ESHA/California red-legged frog habitat and frog populations must include measures to (a) avoid and minimize “take” of individual frogs, (b) avoid and minimize impacts to CRLF habitat; and (c) provide adequate buffer zones to minimize adverse effects of incompatible adjacent land uses. The spatial structure of CRLF mitigation aligned with the freshwater marsh swale bordering the field may substantially constrain the feasibility of some incompatible land use designations, especially any that increase runoff, contaminants or pesticides, predator pressure on CRLF,



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or reduce the extent or quality of potential productive nighttime foraging habitat. The Bolsa Chica court decision [Bolsa Chica Land Trust v. Superior Court 71 Cal. Ap.4th 493, 507] confirmed that the Coastal Act requires that ESHA be avoided and buffered from development impacts and that providing compensatory mitigation alone is insufficient as ESHA mitigation.



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

1.5. Wetland context and cumulative impacts: environmental setting of Pedro Point

The DEIR also omisrepresents the existing *environmental setting and context* of the wetlands of the Pedro Point field. The field's wetlands are represented as completely *isolated* from any other significant wetlands or potential wetland-dependent endangered species habitats. See Figures 3.1-1, 3.7-1, 3.7-2, and 3.7-3, all of which fail to show the San Pedro Creek mouth wetlands and their riparian wetland habitat, vegetation and hydrological connections with Pedro Point field and its wetlands. The San Pedro Creek stream mouth wetlands, however, are shown as red-legged frog habitat (marsh, creek, and riparian vegetation) in Figure 3.7-1, but *without* their wetland connections to the Pedro Point field and drainage swale wetlands. The omission of the San Pedro Creek mouth wetlands in the Coastal Zone is either arbitrarily selective or at least inconsistent in the DEIR: the riparian corridor and wetlands upstream of Highway 1, outside the coastal zone, are represented in Figure 3.7-1 and 3.7-4, but not in Figure 3.7-2.

This error of selective omission of wetlands in the project vicinity appears to be due to the DEIR's failure to critically interpret and update National Wetlands Inventory map with even cursory examination of readily available current aerial or satellite imagery of San Pedro Creek mouth (e.g., Google Earth), or field reconnaissance surveys of the conspicuous restored freshwater marsh there.

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Figure 3.7-2, “National Wetlands Inventory Wetlands”, completely fails to represent the perennial freshwater emergent marsh and freshwater streams of San Pedro Creek mouth as they existed at the time of the DEIR’s notice of preparation, and as they have existed for about a decade. The DEIR cannot uncritically transfer NWI map data without checking for errors of omission due to outdated data layers. The NWI wetland classification (Cowardin USFWS classification system) provides sufficient clear wetland criteria to identify the obvious wetlands (cattail and tule marsh vegetation 6 to over 10 feet tall with standing water) at the mouth of San Pedro Creek. This marsh is clearly known to the City of Pacifica, which was the local partner in the project that restored it.

The adjacent San Pedro Creek mouth freshwater marsh is very significant as an environmental setting of the seasonal wetlands of the Pedro Point field. Ecological connectivity (wildlife corridors for wetland-dependent wildlife) exists between the creek mouth marsh and the field, provided by the drainage swale wetlands (not currently channelized; infilled with sediment and wetland vegetation) consisting of willow swamp (riparian scrub) and freshwater marsh dominated by broadleaf wetland forbs and grasses.

The environmental setting and potential Project and cumulative impacts to wetlands at the Pedro Point field are related to their hydrogeomorphic setting and historical origins and development. The pre-agricultural “natural” condition of the field was freshwater nontidal marsh within the floodplain of San Pedro Creek (San Pedro Valley lowlands). The modern field was part of complex of freshwater marsh and swamp (alder-willow) surrounding Lake Mathilda (the freshwater lagoon outlet of San Pedro Creek prior to channelization), behind the barrier beach (San Pedro Beach). The rich organic fine-grained alluvial soils were converted to agricultural cropland (artichoke fields) by draining and ditching in the late 19th century. The field apparently persisted with either low-intensity agricultural use (grazing, haying) into the 1950s or early 1960s when Linda Mar was extensively developed. Some fill was placed on at least portions of the field in recent decades, but differential subsidence in the flat to very gently sloping (<2%) field maintained depressional microtopography (shallow swales, pools) to the present day.

I have observed the Pedro Point field since the year 2000 in all seasons. Wet (saturated to seasonally flooded) depressions in the field persisted for weeks to months, supporting typical seasonal wetlands grasslands dominated by ryegrass, toad rush, buck’s-horn plaintain in winter-spring months. In addition, a regionally rare vernal pool/pond plant, the flowering quillwort (*Lilaea scilloides*) occurred in local abundance in several pools. In January, 2006, the current landowner and assistants manually excavated diagonal ditches and side-cast fill (ditch spoils) across the field, apparently with the intent of draining the field. In August 2006, mechanical equipment breached wide gaps in the berm between the field and the adjacent drainage swale marsh. These drainage activities were apparently completed without benefit of a Coastal Development Permit or authorization from the U.S. Army Corps of Engineers.

Despite the 2006 drainage ditching and subsequent maintenance and repeated discing of the field, depressional wetlands have persisted and re-emerged (due in part to differential settlement and choking of



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ditches) in the field. The ditching appears to have reduced the duration and extent of wetland hydrology, but significant wetland areas remain widely distributed across most of the field, including the original seasonal wetland plant community.



Excerpt of U.S. Coast Survey map of San Francisco Peninsula, 1869, based on 1850s topography: San Pedro Creek Valley and beach, now Linda Mar. Approximate location of San Pedro Field (Calson/former Archdiocese property) in red shows the relationship of the modern field wetlands to the historical valley floodplain wetland complex. Parallel horizontal hatched lines indicate freshwater marsh. Stippled shoreline area indicates sandy beach, dune, washover. Fine horizontal hatching is open freshwater (Lake Mathilda; historical Pedro Creek Lagoon, drained for agriculture 19th century). Irregular circles/dots within marsh = wooded freshwater swamp (alder, willow). No scale.



Extensive seasonal flooding of the Pedro Point Field during the transition between the historical agricultural era (derelict or low-intensity agricultural use) and suburban development of Linda Mar in San Pedro Valley lowlands (background), likely 1950s-early 1960s. View to E/SE. The eucalyptus and Monterey cypress trees at the fenceline correspond the mature trees present today along the drainage swale at the east end of



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the field. The extensive seasonal pond likely represents flooding patterns prior to partial filling of the wetlands.



Flooding patterns delineate undrained depressions of shallow open water in a matrix of saturated soils in San Pedro Field following heavy rainfall. December 26, 2005. View to N.



Shorebirds (likely sanderlings) forage in the seasonally saturated and flooded field during high tide and storm wave conditions that restrict foraging habitat availability on the adjacent San Pedro (Pacifica State) Beach. December 27, 2005, prior to unauthorized ditching of the field. Red-necked phalaropes also forage in the saturated to flooded field during winter storms.



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January 19, 2006. Manual excavation of drainage ditches in flooded field at the east end of the field. Grass grows above water surface. Water in bare spots can be seen as reflected sunlight on the field; emergent unvegetated mud is dark brown.





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During discing of the field in summer, the berm along the east end of the field was mechanically breached at multiple locations to connect new drainage ditches (excavated in seasonal wetlands of the field) to the large drainage swale occupied by California red-legged frogs, draining to San Pedro Creek through culverts at the northwest end. August 20, 2006.



Despite new unauthorized ditching and drainage connections of the field, ditches merely reduce the extent and duration of soil saturation and flooding; they do not eliminate wetland conditions in the winter following ditching. December 27, 2006

Today, wildlife in the seasonal wetlands of the Pedro Point field includes shorebirds, meadowlarks, black-tail deer, tree frogs, small mammals, and raptors, all of which move between the field wetlands, the adjacent drainage swale wetlands, uplands, and the mouth of San Pedro Creek. Sanderlings and red-necked phalaropes occur intermittently in the flooded to saturated fields, particularly during high tides and storm wave conditions that flood the beach.. In summer, meadowlarks inhabit the field some years, particularly when grass and forb vegetation cover is thick. Small mammals, including mice, pocket gophers, and voles, occur frequently in the field (indicated by burrows, runs) and provide a prey base for raptors, including great horned owls (roosting in eucalyptus trees near the field), and red-tail hawks. Deer browse in the field at night, and at times in the morning as well. The marsh swale bordering the east end

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of the field has supported a breeding population of tree frogs (*Pseudacris sierra*) and a population of federally listed threatened California red-legged frogs (*Rana draytonii*) most years at least since 2000 (see special-status species, below). The DEIR fails to disclose intermittent red-legged frog populations in the vicinity (and sometimes directly bordering) the field, and the existence of probably nocturnal foraging habitat (for this species spring-fall non-breeding adults) within in the field itself. The DEIR failed to identify these significant wildlife movement and habitat connections between the field and habitats in its wetland setting. The DEIR fails to analyze potentially significant impacts to red-legged frogs using the field that would be affected by proposed conversion to coastal residential mixed use development.

The DEIR's failure to correctly characterize the wetland environmental setting (the wetland complex comprising the San Pedro Creek mouth wetlands, the drainage swale wetlands, and the historical and existing condition of the Pedro Point field wetlands) prevents the DEIR from accurately analyzing potentially significant cumulative impacts caused by wetland habitat loss, degradation or fragmentation in the lower San Pedro Creek corridor, and the Pedro Point neighborhood.

Given the outstanding biological significance of the field as the *only open, level (flatland) space left in the Pedro Point neighborhood*, and despite years of being the focus of substantial public concern and comment in scoping and other public meetings, the DEIR's failure to provide even minimally accurate, consistent baseline environmental description of the field is a very serious defect in the DEIR. It precludes accurate assessment of potentially significant impacts that are not mitigated at the policy or site-specific level.

1.6. Biological Resource Impact Assessment and Mitigation in the DEIR

Despite identifying wetlands occurring potentially throughout the field, the DEIR fails to assess potential adverse, significant impacts to Coastal Act wetlands from the proposed land use designation changes at the Pedro Point Field. The DEIR provides no explanation why converting existing wetlands of the Pedro Point field to residential mixed use development would have no significant biological or land use policy impacts. The DEIR omits any specific reference at all to the Pedro Point field wetlands in discussion of biological impacts.

Further, the DEIR's cumulative impact analysis must consider that the extent of Coastal Act wetlands in the field was modified by ditching and drainage activities conducted by the landowner and assistants on January 19, 2006, during conditions of saturation and widespread flooding of the field. As far as I am aware, ditching and draining activities of these wetlands occurred without issuance of a Coastal Development Permit or analysis of environmental impacts. The apparently unauthorized drainage of the field probably results in underestimation of the actual extent of proper Coastal Commission jurisdictional wetlands in the field. See wetland history, below. The errors in the DEIR's environmental baseline, described above, contribute to basic errors in assessment of significant biological impacts and mitigation to wetlands and special-status species.

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 Pacifica General Plan Update DEIR comments



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The DEIR identifies only two potential *general* city-wide biological impacts, without area-specific reference to Pedro Point neighborhood and the specific land use changes proposed in the revised General Plan. Both of these impacts are incorrectly assessed with respect to Pedro Point biological resources, and their proposed programmatic (policy-level) mitigation is infeasible applied to Pedro Point field.

Figure 3.1-2 of the DEIR (p. 3.1-9; “Existing General Plan Land Use”) shows the majority of the Pedro Point field mapped in red (“Commercial”), and apparently one small lot in the northwest corner of the field mapped in light yellow-orange (“low density residential”). The biological impacts of this proposed land use change must be assessed at a programmatic level, commensurate with *the level of detail of land use designation change in the programmatic EIR at neighborhood-scale*. The DEIR, however, fails to assess biological impacts at this geographic scale even at a programmatic level. It merely assesses biological impacts at a sweeping, vague, city-wide, policy level, omitting neighborhood-level biological impacts of specific land use changes proposed (DEIR p. 3.7-48 Impact 3.7-1; p. 3.7-57, Impact 3.7-3). The DEIR also provides only vague, policy-level “mitigation” (pseudo-mitigation; purely speculative policy without reference to physical or biological conditions) for land use change impacts in the aggregate, city-wide:

Impact 3.7-1 Implementation of the proposed General Plan would not have a substantial adverse effect, either directly or through habitat modifications, on candidate, sensitive, or special status species identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service. (*Less than Significant*)

Impact 3.7-3 Implementation of the proposed General Plan would not have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means. (*Less than Significant*)

The DEIR provides no substantial evidence and no arguments for either impact findings or their level of significance. It is inconsistent with proposed land use changes (coastal residential mixed-use development) for the field, and the presence of extensive seasonal wetlands and adjacent special-status species populations.

Although the DEIR does not need to assess impacts of land use change at a project-specific level (*i.e.*, it cannot speculate about the design of specific project proposals or their impacts in site-specific detail), it must address biological impacts that are reasonably foreseeable for the type of land uses proposed in the environmental setting under existing conditions. There is only one major land use change proposed in Pedro Point, and the DEIR provides no biological impact or mitigation discussion about it at



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all – not even the cursory programmatic wetland discussion presented in the Draft Land Use plan itself (LUI-30, p. 4-36, Pacifica Draft Land Use Plan, March 2014). The boilerplate, standard wetland permit discussion in the DEIR at p. 3.7-42 has no substantial bearing on impact or mitigation analysis for wetlands at Pedro Point.

Potentially significant biological impacts of proposed residential land use (development) at the Pedro Point Field and adjacent habitats are enumerated below. These are based on a more adequate characterization of the Pedro Point field wetlands, their relationship to San Pedro Creek wetlands, and their wildlife and hydrological attributes described above. None of these potentially significant biological impacts were analyzed in the DEIR.

Coastal Zone Wetland impacts

- Direct filling (loss) of the last coastal zone seasonal wetlands in Pedro Point watershed due to residential development. Lack of available off-site compensatory mitigation area within the coastal zone of the San Pedro Creek watershed (no feasible compensatory mitigation).
- Degradation of remaining coastal zone wetlands (wetland swale east of field) the San Pedro Creek watershed due to hydrological changes; increased impermeable surfaced area, decreased groundwater infiltration, increased storm runoff from drained residential lots within basin (historic floodplain).
- Degradation of remaining wetlands (wetland swale east of field) due to increased contaminant loading from adjacent residential development: pesticides (residential pesticide use and pesticide loading from runoff and drainage), increased petroleum hydrocarbon contaminant loads from street and driveway runoff; increased surfactant runoff to the drainage swale from residential car washing.

Wildlife and Special-status species impacts

- Loss of storm high tide refuge habitat for shorebirds
- Loss of meadowlark foraging habitat
- Loss of nocturnal deer browsing habitat
- Loss of raptor foraging habitat (Great Horned Owl, red-tail hawk, kestrel)
- Loss of terrestrial foraging habitat for California red-legged frogs
- Loss of flood refuge habitat for California red-legged frogs during peak flood events of San Pedro Creek.



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2.0 Land Use Impacts – Coastal Zone

The DEIR proposes to change the land use designation of the Pedro Point field from “Commercial” (Pacifica General Plan, pp. 86 and 90; DEIR Figure 3.1-2) to “Coastal Residential Mixed Use” (CRMU; DEIR Figure 2.2-1). The DEIR inaccurately states that the new proposed CRMU designation corresponds with an existing “Mixed Use” land use category (Table 3.1-3), but no such independent or category or subcategory of “mixed use” exists in the 1980 General Plan; “mixed use” is simply described as a contingent allowable use of “commercial” land use in the original General Plan (1980 General Plan p. 32-33). The project description is inconsistent, incorrect, and confusing in terms of existing and proposed land uses.

The 2014 Draft General Plan Land Use element states the following with regard to the CRMU designation on p. 4-24: “The Plan retains flexibility for any future development on the vacant site west of the shopping center, which could have residential and small-scale commercial and visitor-oriented uses. Future development should include a small park and access to the berm and the beach beyond”. Table 4.1 of the Draft General Plan states that residential density with CRMU designation may range between 10-15 gross units per acre.

The DEIR, in contrast with the original 1980 General Plan, fails to assess even at a programmatic level the area-specific effects of proposed land use designations for the Pedro Point neighborhood, and specifically for the vacant Pedro Point field, in terms of land use impacts (*cf.* 1980 General Plan, pp. 84-89). The DEIR gives no reason why the level of specificity for impact assessment should be broader and more programmatic than the level of specificity for individual parcel land use designations like the Pedro Point field, or why the level of neighborhood-specific assessment should be significantly less than that of the 1980 General Plan’s treatment of Pedro Point, especially in the Coastal Zone.

The existing land use designation of the field, “commercial” is compatible with low-intensity, visitor-serving commercial recreational land uses that support coastal-dependent (beach and coastal scenic) recreation and associated economic uses, which matches the existing zoning (commercial-recreation) of the field. Low-intensity commercial land uses that do not involve ditching, draining, filling, paving, or construction in the field (open-space and recreational uses, special events, coastal agriculture) are potentially compatible with conservation of wetlands, environmentally sensitive habitat areas, and special-status species, and relevant Coastal Act policies. Proposed Coastal Residential Mixed Use land uses, however, are likely to have significant impacts on **Coastal Act land use policies** (cited in Draft Pacifica Local Coastal Land Use Plan, March 2014, Appendix A) and Pacifica General Plan policies involving these elements, as discussed below.

The extensive distribution of Coastal Act jurisdictional wetlands in the Pedro Point field, and the presence of California red-legged frog habitat and population in the adjacent freshwater marsh swale,



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both indicate that land use designations for the field must be compatible with ESHA policies of the Coastal Commission. According to the Coastal Commission's LCP Update Guide: Sensitive Habitats and Natural Resources (April 3, 2007 update), the DEIR and LCP should clearly state that only "resource dependent" development, such as restoration or nature study, is allowed in ESHA, consistent with Coastal Act §30240. No ESHA assessment for the proposed changes in land use designation of the Pedro Point field has been provided in the DEIR, which is likely related to the DEIR's failure to accurately identify wetlands and special-status species at the site. The DEIR must be revised to include this analysis of potentially significant environmental impacts even at a programmatic level.

The 1980 Pacifica General Plan provided a programmatic analysis of consistency between proposed (commercial) land use designation of the Pedro Point Field and specific Coastal Act policies (1980 General Plan p. 86), including assessment of unimproved coastal access through foot trails (p. 88). The DEIR for the General Plan update has provided no such analysis for proposed changed land use designation of the field or coastal access impacts. It merely included the Coastal Act policies as an appendix, without analysis of proposed land use designation change impacts. The changed land use designation has potential significant land use policy conflicts (impacts) with Coastal Act land use policies, each of which affects ESHA (wetlands and special-status wetland-dependent wildlife). Some examples are provided below. *The DEIR should fully assess at a programmatic level all such potential significant land use impacts, and compare the compatibility (conflict) of existing, proposed and alternative land use designations for the field in terms of Coastal Act policies.*

Section 30212 New development projects

(a) Public access from the nearest public roadway to the shoreline and along the coast shall be provided in new development projects except where:

- (1) it is inconsistent with public safety, military security needs, or the protection of fragile coastal resources,**
- (2) adequate access exists nearby, or,**
- (3) agriculture would be adversely affected.**

Pedro Point field has three well-established and persistent foot trails that lead from San Pedro Avenue (the nearest public roadway to the shoreline) to a private beach with long-established open public access. The foot trails are visible in aerial photographs dating back to at least 1993 (Google Earth images) and re-emerge after being temporarily erased by discing, ditching, or mowing. The foot trails are formed by trampling patterns established between physical points of access from the roadway to a stairway from the beach to the historic railroad berm, and to a public path to the beach at the mouth of San Pedro Creek. Foot trails are frequently used by beach visitors and surfers seeking minimal travel distances to the beach. The foot trails evidently established long before the current ownership of the property. The foot trails are the most efficient short cuts from San Pedro Avenue to the public shore; alternative routes along public



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roads would nearly double foot trail distance from the public roads to the shore from established access points.



Pedro Point field in relation to public and private ocean shores, and freshwater marsh and stream habitat of San Pedro Creek mouth. 2013 Google Earth image.



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Foot trail network (2013) of Pedro Point Field, showing connections to levee trail access to private shore with long-established public access. Freshwater wetland drainage swale connecting to San Pedro Creek mouth is shown in dashed blue line. 2013 Google Earth image.



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Detail of Pedro Point field foot trail connection to the public access walkway to privately owned beach (with public access) across the historic railroad berm. 2013 Google Earth image.

Proposed coastal residential mixed-use development may potentially eliminate or significantly impair existing long-established public access from San Pedro Avenue to the public shore. This could be mitigated by requirements to provide public access easements along existing trails or equivalent efficient alignments (similar travel distance, slopes, road access points), but the DEIR proposed no mitigation or policy that would ensure such mitigation. The impact and mitigation for this Coastal Act policy were not assessed in the DEIR. There are no military needs, fragile coastal resources, or existing agriculture to provide exemptions for this policy.

Section 30221 Oceanfront land; protection for recreational use and Development

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



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The Pedro Point field is separated from the ocean only by the railroad berm, and in its original condition (backbarrier floodplain marsh) it was “oceanfront”, with line of sight to the ocean over the low barrier beach. According to Pedro Point long-term residents, the field has been used for recreation for years prior to and during the current land ownership. Recent recreational uses include children’s games, domestic animal feeding and observation (former llama and emu enclosure along the toe of the railroad berm), ball sports, playground activities extending from the adjacent Pedro Point firehouse playground, and dog walking. The field is suitable for these established recreational uses, and is suitable for other recreational uses as well.

Proposed Coastal Mixed Use Residential land use changes could eliminate, reduce, or substantially interfere with long-established recreational uses of the oceanfront land. This impact is not assessed in the DEIR. The feasibility of mitigation for this impact is not assessed, and no mitigation is proposed. Recreational uses that depend on extensive area or open scenic views may not be feasible to mitigate with small parks enclosed by development.

Section 30222 Private lands; priority of development purposes

The use of private lands suitable for *visitor-serving commercial recreational facilities* designed to enhance public opportunities for coastal recreation *shall have priority over private residential, general industrial, or general commercial development, but not over agriculture or coastal-dependent industry.*

The proposed change in land use from an open field (compatible with public access, coastal views, and recreation) to a mixed-use *private* residential development would conflict with this coastal act policy. This would be a significant impact that, by definition, could not be mitigated. General industrial or commercial development of the field would also conflict with this policy. Commercial development by agriculture including public access and visitor-serving commerce (such as a coastal berry farm, pumpkin farm with visitor-serving amenities), in contrast, would not conflict with this policy. No mitigation is feasible for this conflict, by definition of “priority” of land uses cited in the policy.

Section 30240 Environmentally sensitive habitat areas (ESHA); adjacent developments

(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.*



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The field contains extensive seasonal wetlands (winter-saturated and temporarily flooded depressional wetlands and drainage swales, ditches). The perennial wetlands of the drainage swale at the east end of the field supports California red-legged frog habitat and is typically occupied by a population (see comments in this letter, above). The seasonal wetlands and the zone bordering the frog habitat of the swale meet the definition of ESHA. Residential and mixed use commercial development would likely eliminate, significantly reduce, or degrade existing wetlands and ESHA on the site. Since the field is the last undeveloped lowland floodplain of San Pedro Creek within the Coastal Zone that is available for wetland restoration and enhancement, it is infeasible to mitigate impacts to these wetlands off-site; compensatory mitigation is not available for the red-legged frog populations in lower San Pedro Creek in the coastal zone. The DEIR failed to assess impacts to this Coastal Act policy or propose any feasible mitigation for it. The only feasible mitigation for this policy impact would be avoidance of impacts by not applying the residential mixed use land use designation.

Section 30242. Lands suitable for agricultural use; conversion

All other *lands suitable for agricultural use* shall not be converted to nonagricultural uses unless (1) continued *or renewed* agricultural use is not feasible, or (2) such conversion would preserve prime agricultural land or concentrate development consistent with Section 30250. Any such permitted conversion shall be compatible with continued agricultural use on surrounding lands. (emphasis added)

The Pedro Point field was historically prime agricultural land, but was abandoned. Nonetheless, renewal of prime agricultural use of the field is potentially feasible (physically and economically) and could be integrated with visitor-serving recreational and economic development aligned with the new coastal trail to Devil's Slide. The original prime agricultural soils are present beneath shallow fill. The site is suitable for coastal commercial visitor-oriented berry farm or produce farm and related recreational or visitor-serving uses (viz. Half Moon Bay to Davenport). Renewed agricultural use combined with tourism, some recreational uses, or eco-tourism may be compatible with conservation of seasonal wetlands and special-status wildlife if properly designed. The DEIR failed to consider feasible alternatives compatible with this section.

Section 30243 Productivity of soils and timberlands; conversions

The long-term productivity of soils and timberlands shall be protected, and conversions of coastal commercial timberlands in units of commercial size to other uses or their division into units of noncommercial size shall be limited to providing for necessary timber processing and related facilities.

The Pedro Point field is former prime agricultural land (historic artichoke farm) on rich alluvial soils (drained marshland). The soils have been degraded by placement of fill, but may be remediated by either



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removal of fill or addition of soil amendments to restore agricultural productivity similar to farms on the marine terraces and valleys along the San Mateo Coast south of Pacifica. There are no other potential highly productive historic farmland soils left in the Coastal Zone of Pacifica. Residential development of the field would conflict with this policy that requires the protection of long-term soil productivity. This impact was not assessed or mitigated in the DEIR.

Section 30251 Scenic and visual qualities

The scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance. Permitted development shall be sited and designed to protect views to and along the ocean and scenic coastal areas, to minimize the alteration of natural land forms, to be visually compatible with the character of surrounding areas, and, where feasible, to restore and enhance visual quality in visually degraded areas. New development in highly scenic areas such as those designated in the California Coastline Preservation and Recreation Plan prepared by the Department of Parks and Recreation and by local government shall be subordinate to the character of its setting.

The Pedro Point field is the last undeveloped lowland (floodplain) in the Coastal Zone of San Pedro Creek's watershed that retains the original overall floodplain topography and visual character of the historic farms that dominated the valley. All other valley lowlands have been developed in the Coastal Zone of Pacifica, including the Salada Valley (the historical Salada Valley farmland has been developed, drained and filled, with only the deepest lagoon bed remaining as a wetland). The visual character of the adjacent historic railroad berm is dependent on the contrast between the steep relief of the berm and the adjacent lowland flats of the field. Residential development (with or without "pocket parks") would not protect the scenic and visual qualities of the field and adjacent historic berm. Residential development of the field would fully fill the lowland open space visual character of Pedro Point. This would conflict with the policy.

Section 30253 Minimization of adverse impacts

New development shall do all of the following:

- (a) Minimize risks to life and property in areas of high geologic, flood, and fire hazard.
- (b) Assure stability and structural integrity, and neither create nor contribute significantly to erosion, geologic instability, or destruction of the site or surrounding area or in any way require the construction of protective devices that would substantially alter natural landforms along bluffs and cliffs. [...]

Most of the Pedro Point field lies approximately 15-17 feet in elevation above Mean Sea Level (MSL), only about 3-5 feet above the marsh and high tide beach at the mouth of San Pedro Creek. In addition, the



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alluvial soils (historical wetland) of the field have the same relative liquefaction (earthquake shaking) potential as diked bay muds and marshes in San Francisco Bay, like those that underlie filled San Francisco peninsula baylands. (Witter, Robert C., Keith L. Knudsen, Janet M. Sowers, Carl M. Wentworth, Richard D. Koehler, and Carolyn E. Randolph. 2006. Maps of Quaternary deposits and liquefaction susceptibility, nine-county San Francisco Bay Area. U.S. Geological Survey Open-File Report 2006-1037 Version 1.1; shown in Draft Pacifica Coastal Land Use Plan 2014, Figure 5.1). This condition contrasts with relatively low risk of liquefaction affecting residential and commercial development in adjacent lands built over bedrock. Structural (residential or commercial) development of the field may cause significant conflicts (impacts) with this section. In contrast, this section would be potentially compatible with recreational or other low-intensity commercial development or agricultural redevelopment of the field. The DEIR failed to analyze alternative land use designations compatible with this section.

Similarly, placing additional residential development in the last undeveloped floodplain area within the coastal zone of San Pedro Valley – currently able to function as a flood detention and storage basin when San Pedro Creek is at extreme high flood stage during extreme high tides – would conflict with this land use policy (Draft Pacifica Coastal Land Use Plan 2014 p. 5-19). The intensity, frequency, and significance of this land use policy conflict would likely increase as sea level rises, and as intense storm frequency increases with climate change. In addition, the field lies within a Tsunami evacuation area of the Coastal Zone (Draft Pacifica Coastal Land Use Plan 2014, Figure 5.3). Flooding, liquefaction, sea level rise impacts, increasing over time as indicated by the draft Pacifica Coastal Land Use plan (2014) demonstrate the conflict between this Coastal Act policy and the proposed land use change for Pedro Point field.

Section 30255 Priority of coastal-dependent developments

Coastal-dependent developments shall have priority over other developments on or near the shoreline. Except as provided elsewhere in this division, coastal-dependent developments shall not be sited in a wetland. When appropriate, coastal-related developments should be accommodated within reasonable proximity to the coastal-dependent uses they support.

Residential development itself is not fundamentally “coastal dependent”, even if the land use designation nomenclature is “Coastal Residential Mixed Use”. “Coastal” as a modifier does not denote any essential distinction in the nature of residential development, but merely describes its location in the coastal zone. Other types of commercial development based on recreational access to the shoreline or the distinctive coastal climate (e.g., surfer recreational events, coastal agritourism like berry farm stands with berry farming) would have priority over residential development at this location. Residential development would conflict with this policy. In addition, development within wetlands as defined in the Coastal Act



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(whether or not they meet federal wetland criteria for fill authorization under the Clean Water Act) would conflict with this policy.

City of Pacifica Land Use Policy Impacts

The DEIR's proposed change in land use for the Pedro Point field also conflicts (and thus causes a significant land use policy impact) with the City's own policy on Wetlands Conservation:

p. 3.1-22 **CO-I-8 Maintain Functional Capacity of Wetlands.** Ensure that any diking, filling, or dredging in existing wetlands maintains or enhances their functional capacity. *Any alteration of coastal wetlands identified by the Department of Fish and Game must be limited to very minor incidental public facilities, restorative measures, or nature study, according to the California Coastal Act.*

The "functional capacity" of the existing wetlands at the Pedro Point field and adjacent to them are dependent on their geographic setting and landscape position – their relationship to San Pedro Creek (off-channel flood velocity refuge; population buffer for California red-legged frogs; infiltration and groundwater recharge potential; flood detention and flood peak attenuation) and other hydrogeomorphic and ecological functions (red-legged frog nocturnal foraging habitat potential; shorebird storm refuge and roost sites). There are no other undeveloped historic floodplain locations within the lower San Pedro Creek valley, let alone the Coastal Zone, where loss or degradation of these functions could be compensated by wetland restoration. Residential development of the field would likely have a significant impact on existing wetlands of the site and its vicinity, and without any feasible mitigation identified.

This City policy is also vague and unenforceable as mitigation for wetland impacts because: (a) it does not cite or define the scope or meaning of the jargon of wetland "functional capacity"; (b) it does not identify any geographic setting within Pacifica for "functional capacity" (on-site or off-site/within-watershed) and (c) it fails to cite or provide any meaningful criteria for what constitutes maintenance or enhancement of "functional capacity". Furthermore, the California Department of Fish and Wildlife does not delineate or identify coastal wetlands as a service to local governments. The Department and the Coastal Commission use approximately the same wetland indicator criteria for determination of wetlands, but the agencies themselves generally do not conduct wetland delineations. The policy is also misleading as proposed policy-level mitigation in the DEIR because potential wetland fill in context of proposed land use designation changes in the DEIR do not involve restoration, nature study, or public facilities. The DEIR identifies wetlands at the Pedro Point field exactly where it proposes private mixed use residential and commercial development as the new land use designation. This "alteration" does not meet the criteria cited in the policy, and does not involve "enhancement" of functional capacity if the wetlands must be filled or drained for residential or commercial development. The land use designation proposed basically conflicts with this policy, and appears to be an unmitigated significant impact, since no feasible



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mitigation is identified. Furthermore, the DEIR alleges that no mitigation is even required because it wrongly asserts that there is no impact.

3.0 Conclusions

The DEIR fails to provide adequate analysis of potential impacts and feasible mitigation measures for the proposed land use changes at the Pedro Point field, compared with (a) existing conditions; (b) existing land use designations under the General Plan/LCP, and (c) alternatives that are environmentally superior and compatible with Coastal Act policies. Because the DEIR is fundamentally inadequate, after such revisions, the DEIR should be recirculated for further public review.

Thank you for considering these comments. Please contact me if you have any questions.

Peter Baye

Cc: Pedro Point Community Association
Law Offices of Brian Gaffney APC
Richard Grassetti
California Coastal Commission



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ATTACHMENT A – STATEMENT OF QUALIFICATIONS - Peter R. Baye, Ph.D.

I am a coastal ecologist and botanist with over 30 years of professional and academic experience. My Ph.D. research in coastal ecology (University of Western Ontario, Canada, Department of Plant Sciences, 1990) was followed by a career in applied ecology in California. I worked for the U.S. Army Corps of Engineers, San Francisco District, where I served as a senior environmental scientist and regulatory project manager conducting endangered species consultation, wetland jurisdictional determinations, wetland assessments, preparing Environmental Assessments and managing joint NEPA/CEQA Environmental Impact Statements/Reports. My Corps regulatory projects included sites adjacent to Port Sonoma (Sonoma Baylands, Carl's Marsh). Subsequently I worked for the U.S. Fish and Wildlife Service, where I prepared endangered species recovery plans (including comprehensive plans covering all of Marin Baylands and tidal marshes) and endangered species biological opinions. I was a contributing author and participant in the Baylands Ecosystem Habitat Goals Report (Goals Project 1999), its companion volume on Bayland species and community profiles (2000), and its 2014 update (in preparation), for which I developed many Marin bayland recommendations. I have developed or substantially contributed to estuarine wetland restoration and management plans for many Marin coastal wetland sites, including some adjacent to the plan area: Corte Madera Baylands Conceptual Sea Level Rise Adaptation Strategy, prepared by The San Francisco Bay Conservation and Development Commission and ESA PWA (specific focal area: Corte Madera Ecological Reserve marshes); Aramburu Island, Richardson Bay (with Wetlands and Water Resources) and wetland restoration projects at Bahia, Novato (with ESA-PWA) and Bolinas Lagoon (Kent Island, with William Carmen & Associates).



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MEMORANDUM

To: Jim Browning, U.S. Fish and Wildlife Service, SFWO, Sacramento

From: Peter Baye, Ph.D., coastal plant ecologist

Date: 4 May 2005

SUBJECT: Documentation of California red-legged frog occurrence at Pedro Point, Pacifica, San Mateo County

Jim, I am reporting to USFWS directly the attached documentation of a California red-legged frog population at Pedro Point. The site is a drainage ditch in an historic floodplain of Pedro Creek, recently proposed for residential development. The site is somewhat isolated from Pedro Creek by Highway 1, a road, buildings, and parking lots, but has drainage connections to the mouth of the creek.

LOCATION: Pedro Point Road opposite Grand Avenue, Pedro Point, Pacifica, San Mateo County. Southeast corner of Calson/"Archdiocese" Pedro Point Field.

SETTING: Drainage ditch through blue gum windbreak between commercial shopping plaza and mown grassy field with seasonal wetlands, approximately 0.25 mi from Pedro Creek. See photo attached.

HABITAT CONDITIONS: Road drainage ditch and culvert fed by seasonal to perennial seeps in hillslopes of developed residential area and historic blue gum/Monterey pine plantation. Blue gum-shaded pool less than 3 m diameter, up to 25 cm deep currently, minimal vegetation; mostly flood-deposited sand and silt; abundant non-native wetland vegetation downstream, but no perennial ponds or cattail/tule marsh.

OBSERVED OCCURRENCE: 3 Adult CRLF observed; one within culvert, one at pool edge of concrete culvert support, one submerged at depth of 10 cm. No tree frogs present in pool, but present in downstream portions of ditch system. Photos attached of two CRLF, one highly visible, one obscure (submerged silhouette). Visual observation and photos 5/3/05. Multiple aural detections of diving frogs April; no visual detections in turbid water. No egg masses observed within visible upper 10 cm of water column.

NEARBY OCCURRENCES: Other confirmed CRLF observations in last 2 years at mouth of Calera Creek (Quarry), with San Francisco garter snake, approx 1.5 mile north. Likely



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occurrence in Pedro Creek floodplain wetlands, perennial freshwater marsh. Garter snakes (likely San Francisco ssp.) also present in residential area gardens, yards.

POTENTIAL THREATS: Residential development proposed for adjacent field; likely to require improved drainage. Drainage problems of adjacent Pedro Road may require repair work; some recently implemented.



(a)



(b)

Figure 1: (a) Culvert and scour pool with lobe of flood sediment. (b) Detail of pool and sack-concrete dam. Adult CRLF head emergent at edge of sack-concrete, next to woody debris (sticks) at extreme left. 5/3/05.



ANNAPOLIS FIELD STATION

Coastal Plant Observatory

Plant Ecology Serving Conservation

33660 Annapolis Road

Annapolis, California 95412



(415) 310-5109

baye@earthlink.net



Figure 2. Adult California red-legged frog at edge of sack-concrete dam of culvert. 5/3/05



ANNAPOLIS FIELD STATION

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Annapolis, California 95412



(415) 310-5109

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Figure 3. Submerged silhouette of second CRLF in pool.

Horrisberger, Christina

From: Renee Ananda (rananda@coastal.ca.gov)
Sent: Wednesday, May 19, 2010 1:14 PM
To: Horrisberger, Christina
Cc: sdeleann@dfg.ca.gov; ryan_alah@fws.gov; Dongu nes, Raymond
Subject: FW: APN 023-072-010 Study Session

Christina,

It appears you didn't receive my comments (originally sent on May 13th). Please see the forwarded message below. Sorry for any inconveniences. Thank you.

From: Renee Ananda
Sent: Thursday, May 13, 2010 2:49 PM
To: 'HorrisbergerC@cl.pacificca.ca.us'
Cc: Renee Ananda
Subject: APN 023-072-010 Study Session

Hello Christina,

This is a follow-up to our conversation (on Monday 5/10) re: the applicant's (Shawn Rhodes') preliminary proposal to construct a 2-story commercial-residential unit, a surf shop, and storage shop (a total of 3 structures) and a skate board park on a vacant lot west of San Pedro Point Shopping Center. The plans we received are preliminary and serve for early discussions of what would be required for the potential development project. Please note my preliminary comments below:

The site is located within the Coastal Zone. It appears that a majority of the site is in an area under the retained jurisdiction the Coastal Commission. The applicant will need to obtain a Coastal Development Permit from the Coastal Commission.

The Commission is concerned about the development's consistency with the Coastal Act (particularly Chapter 3, Article 6.. Development), therefore potential impacts to biological resources, coastal views, public access to the coast (i.e., public beaches), and its visual compatibility with the character of the surrounding area. The applicant should include an analysis of traffic that would be generated by the development and associated impacts to vehicular public access to the coast.

The design of the proposed project should consider measures to avoid or reduce potential impacts to the adjacent wetlands and drainage area, as these most likely meet the definition of a wetlands under the Coastal Act. The applicant should provide an evaluation of the proposed/potential development's impact on biological resources located on and adjacent to the site.

These comments do not preclude additional comments Commission staff may have on the proposal, as planning and permitting processes progress.

Thank you for the opportunity to provide you with comments. RTA

5/19/2010

Rexing, Stephanie@Coastal

From: farostenk@ci.pacific.ca.us
Sent: Thursday, October 30, 2014 12:05 PM
To: Rexing, Stephanie@Coastal
Subject: FW: Comments for 505 San Pedro Lot Behind Pedro Point Mall

Stephanie: We talked about this project yesterday for staff review and Lee asked me about the CCC's role. My thinking is that we process the local permits (CDP, PSD, U-I, Sign and Parking Exception) and if the project is approved, then the applicant would get the CDP approved from the CCC. The CCC's additional permit jurisdiction just covers about a third of the lot, closest to the ocean and not the entire project site so it makes sense for the City to review it first. Also, there may be some wetland issues that need to be addressed with a better Biological Assessment than what the applicant provided (I emailed it to you from 2005 and it was a different project proposal) and those wetland issues may impact the design of the project.

Kathryn Farbstein

Assistant Planner
City of Pacifica
650-738-7341

From: Farbstein, Kathryn
Sent: Tuesday, October 28, 2014 3:58 PM
To: 'Rexing, Stephanie@Coastal'
Subject: Comments for 505 San Pedro Lot Behind Pedro Point Mall

Stephanie: I am working on putting comments together for this project and I'll be determining the project incomplete on November 6th of next week. Let me know if you want me to include your comments or if that's not possible, I can forward your comments separately.

Kathryn Farbstein

Assistant Planner
City of Pacifica
650-738-7341

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CALIFORNIA COASTAL COMMISSION

NORTH OAKLAND COAST DISTRICT OFFICE
450 MARSH STREET, SUITE 200
SAN FRANCISCO, CA 94102
PHONE: (415) 774-1200
FAX: (415) 774-1400
WWW.COASTAL.CA.GOV



May 8, 2015

Kathryn Forsttein
Assistant Planner
City of Pacifica
1800 Francisco Blvd.
Pacifica, CA
94044

Subject: *Commission Staff Comments on Development Review Coordination for Proposed Project at 505 San Pedro Avenue, Pacifica, CA*

Dear Ms. Forsttein:

Thank you for the opportunity to comment on the Development Review Coordination materials for the proposed development of a 2 story retail building plus basement, covered skate park, 2 story storage building, parking lot and 2 story mixed use building with 2 residential units at 505 San Pedro Avenue, Pacifica, CA. The proposed development will cover approximately 13,000 square feet on the 37,000 square foot lot with the surf shop totaling 3,500 square feet, the storage building totaling 1,540 square feet and the retail/residential building totaling 2,516 square feet. The development also proposes a total of 26 parking spaces-24 uncovered spots and 2 covered spots.

Coastal Commission Staff has previously sent comments on this development proposal (see attached May 13, 2010 email from Renee Amador and my email from October 30, 2014) citing concerns regarding the proposed development's potential impacts to biological resources, public views, access to the coast, compatibility with surrounding development, and to traffic. Specifically, our concerns consist of the proposed project's potential impacts to the sensitive biological resources present and associated with the intermittent stream that bounds the western edge of the subject parcel, potential flooding and geotechnical issues, hardcape protection concerns regarding the proposed installation of rip rap on the banks of the intermittent stream, the appropriateness of residential use on this parcel and finally, future parking and access conflicts with the adjacent shopping center use. In addition, Commission Staff raised jurisdictional issues in our previous comments because it appears the subject parcel is located within a split jurisdiction between the City and Coastal Commission coastal permit jurisdiction, either requiring the applicant to apply for two separate coastal development permits or a consolidated permit handled by the Commission (with permission from the applicant and the City).

With regard to biological resources, the 2005 biological report prepared for the subject property found that given the parcel's close proximity to San Pedro Creek, California red-legged frogs

(CRLF) are likely to be “present and breeding within the immediate area of the surrounding property,” along the high quality habitat of the creek. The subject site is constrained by the presence of the drainage, on the western edge of the parcel that the 2005 biological report by Thomas Reid Associates determined was likely to provide a dispersal corridor for CRLF, especially given the drainage’s proximity to San Pedro Creek. This drainage was deemed an “intermittent stream” in the biological report. Because of the presence of this drainage, it is also likely that the adjacent upland habitats may provide refugia for CRLF and upland areas to aestivate. Because of the parcel’s constrained shape, it is unlikely the development could be adequately buffered from the drainage in order to avoid sensitive habitat impacts. LCP Policies protect intermittent streams, requiring that such streams shall be “protected, enhanced and restored where feasible”; also requiring that adequate buffer zones be identified to protect habitat areas associated with the stream. LCP Policy C-99 requires that in general, a buffer of at least 100 feet measured from the outward edge of the vegetation would be appropriate, unless such a buffer is deemed unnecessary. Because the proposed development will immediately abut the drainage edge, and the upland habitats are proposed to be removed for future development or paved over, this proposed project does not conform to the LCP policies protecting sensitive habitats.

With regard to geotechnical issues, plans dated October 7, 2014 proposed rip rap be installed along the bank of the drainage per the recommendation of the geotechnical engineer. The current plans appear to remove this aspect of the development but still propose to install a concrete curb wall with wood railing at the drainage edge. LCP Policies found on page C-105 state that since erosion is a problem in Pacifica, a report by the United States Army Corps of Engineers found that in many cases shoreline [protection] structures are not economically justified and would be allowable to protect only “major beach access or highly sensitive habitat.” Further, if such protections are allowed as part of any development LCP Policy C-105 requires that a qualified expert should analyze and propose mitigation for such structures. Further, LCP Policy C-101 requires that development in habitat support areas, such as on the banks of this stream, cannot disrupt habitat and must minimize erosion. Given these limitations and the development’s proximity to the drainage which provides flood storage capacity for the surrounding areas, it is unclear how the proposed development will be protected from flooding and erosion. Commission Staff has seen no analysis of flooding impacts to the proposed development including without the use of streambank alteration, but such an analysis would be required given the development’s proximity to the drainage at the western edge of the parcel and its association with San Pedro Creek.

Finally, with regard to the development’s, size, scope, intensity and type of use, Commission Staff has concerns that locating new residential and other mixed-use/retail development so close to the already existing shopping center may have traffic impacts on the already-impacted Highway 1 in this area, and subsequent impacts to public access to the coast. No traffic analysis has been shared with Coastal Commission staff. In addition, the parcel is zoned C-2 “Community Commercial District,” which conditionally allows residential uses only when they are located entirely above the ground floor. Residential development in C-2 zones is further controlled by a minimum lot area per dwelling unit of 2,000 square feet. Further, development in the C-2 zones located in the Coastal Zone that propose a new use other than visitor-serving commercial use, require a Use Permit determination that demands “an analysis of the balance of visitor-serving commercial uses with other commercial uses, and consistency with the individual neighborhood narratives and the plan conclusions and other relevant policies of the...Land Use

Plan" (per Implementation Plan Sec. 9-4.1002). The proposed development, if allowable at all given the biological and potential flood resource concerns, would need to be designed to fit the individual narrative of the neighborhood and other requirements of the LUP that are specific to the Pedro Point neighborhood.

If you have any questions regarding these comments or wish to discuss the project further, please contact me at 415-597-5894.

Sincerely,

A handwritten signature in black ink, appearing to read "Steph", with a stylized flourish at the end.

Stephanie Rexing, Coastal Planner

Encl May 13, 2010 Email
October 30, 2014 Email

Letter 2

Murdock, Christian

From: Foster, Patrick@Coastal <Patrick.Foster@coastal.ca.gov>
Sent: Tuesday, May 01, 2018 4:36 PM
To: Murdock, Christian
Cc: Rixing, Stephanie@Coastal
Subject: RE: 505 San Pedro CEQA Document

MAY 01 2018

City of San Pedro

Hi Christian,

2-1

Thank you for forwarding the MND linked below for the proposed project at 505 San Pedro Ave including three new buildings, a skatepark, and parking area. The project site is mostly in the City's CDP jurisdiction, but partly in the Commission's retained jurisdiction which covers about a third of the lot closest to the ocean. It is our impression the City's intent is to process local permits, including a CDP, after which the applicant would seek another CDP from us if the project is approved locally – please let us know if this is inaccurate. Our primary concerns involve biological resources. Specifically, identification of wetlands and required development buffers, as well as the presence of sensitive species on site.

2-2

The MND indicates the potential presence of CRLF, SFGS, Monarch butterfly, and protected raptors/nesting birds. Overall, our biologist concurs with the sensitive species identified as potentially occurring here, though also indicates that CRLF may be using the swale as a corridor and moving across the parcel. As for raptors and other birds, with the open field adjacent to the parcel, the trees and swale vegetation provide good habitat for nesting, so pre-construction surveys are critical. Additionally, it is unclear why no bat species are discussed other than the western red bat, as it is possible hoary bats (*Lasiurus cinereus*) are in the area as well. With regard to sensitive plant species, our biologist cites concern regarding the possible presence of SF spineflower (*Chorizanthe cuspidata* var. *cuspidata*) because it often turns up in disturbed areas. It appears the reconnaissance surveys were completed outside the bloom season for most of the sensitive plants flagged, making it more difficult to detect them.

2-3

As for mitigation, additional measures are requested, including:

- 1) Coastal Commission to receive copies of all surveys.
- 2) Implement IV-1 (p40) limits on work following significant rain events (>0.25 in, with 24h wait period) when CRLF would be more mobile.
- 3) In addition to exclusion fencing, conduct daily checks prior to the start of construction for sensitive wildlife that may have found a way in.
- 4) Cover any open trenches at the end of work each day or fitted with an exit ramp for any wildlife that may fall in.
- 5) Extend IV-3 (p41) raptor surveys to out to 500 ft (300 ft is fine for other birds) and if nesting observed, apply minimum buffer of 500ft (300ft for other birds) until young have fledged.
- 6) Extend IV-4(a) (p41) pre-construction bat emergence surveys to all trees on the parcel and out 500ft since any bats there will also be sensitive receptors to construction noise.
- 7) Apply CDFW-determined buffers to any such sensitive receptors (maternity roosts or hibernacula)
- 8) Removal of invasive non-native species (in addition to omitting them from any planting on the property).

2-4

2-5

2-6

2-7

2-8

In terms of wetlands, the MND acknowledges the general buffer rule of 100 feet from the outward edge of riparian vegetation and notes that "an intermittent drainage ditch on the west side of the project area contains some riparian vegetation (e.g., Arroyo Willow)." (p.42) It also notes that this drainage would meet the Coastal Commission's one-parameter wetland definition. However, indirect impacts concerning the swale seem to have been dismissed – while development may not physically disturb the swale on the adjacent parcel, noise and runoff are potentially going to affect any sensitive resources there, and sensitive species likely make use of the area as a wildlife corridor to at least a limited extent as such species will not necessarily be able to use the adjacent upland areas if they are dependent on the cover and moisture the swale provides. These indirect impacts reflect the purpose of establishing development buffers, and protection in this case is warranted. Thus, we request that the applicant complete a full 1-parameter delineation at

Letter 2
Cont'd

2-8
Cont'd

2-9

this stage, rather than later on in the permitting process. While the bank/topography may appear to be a distinct boundary for hydro and soil parameters, vegetation may extend towards the parcel of interest, which will be important with respect to setting appropriate buffers. While a typical buffer is 100 ft and may be necessary here as at most locations, we recognize that less may be acceptable depending on the nature of the parcel, its place in the landscape, and the susceptibility of the wetland to various impacts. However, any deviation from typical buffers must be substantiated with clear evidence on these points.

Again, thank you for the chance to comment at this early stage. We look forward to further coordination on this project.

-Patrick

Patrick Foster
Coastal Planner
North Central Coast District
California Coastal Commission
45 Fremont Street, Suite 2000
San Francisco, CA 94105
(415) 904-5267
patrick.foster@coastal.ca.gov
www.coastal.ca.gov



From: murdockc@ci.pacifica.ca.us [mailto:murdockc@ci.pacifica.ca.us]
Sent: Thursday, April 05, 2018 10:24 AM
To: Foster, Patrick@Coastal
Cc: Rexing, Stephanie@Coastal
Subject: 505 San Pedro CEQA Document

Hi Patrick,

We wanted to make you aware that the public comment period on the CEQA document for the 505 San Pedro Avenue (Shawn Rhodes) project started on 4/4/2018. You can access the document at the link below. We invite the Coastal Commission to offer comments on the CEQA document during this period.

http://www.cityofpacifica.org/depts/planning/environmental_documents/default.asp

Best regards,

Christian

Christian Murdock
Senior Planner
Planning Department
City of Pacifica
1800 Francisco Blvd.
Pacifica, CA 94044
www.cityofpacifica.org

Email: murdockc@ci.pacifica.ca.us

**505 SAN PEDRO AVENUE, PACIFICA
WETLAND DELINEATION**

PREPARED FOR:

Shawn Rhodes

PREPARED BY:

Coast Ridge Ecology, LLC
1410 31st Avenue
San Francisco, CA 94122



November 2019

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1. SUMMARY

This report presents the results of a formal delineation of waters of the United States, including wetlands, at an undeveloped property (drainage channel) adjacent to 505 San Pedro Avenue, Pacifica, California (APN 023-72-010). The property drainage channel is within an unaccepted city of Pacifica Right of Way. The purpose of the delineation of the drainage channel is to assist the California Coastal Commission in identifying the type and extent of waters subject to federal and state jurisdiction and to inform potential impacts from future development of the adjacent property at 505 San Pedro Avenue.

Fieldwork was performed by Coast Ridge Ecology staff biologists in September and October 2019 using the routine determination method described in the *1987 US Army Corps of Engineers (USACE) Wetland Delineation Manual*, in incorporation with the USACE 2010 *Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Western Mountains, Valleys and Coast Region (Version 2.0)*. Wetland vegetation types were mapped in the field using a Trimble GeoExplorer unit on September 18, October 21, and October 25, 2019.

Field data was analyzed to determine a wetland boundary. A total of 0.088 acres of potentially jurisdictional federal wetlands (i.e. three-parameter) are present within the study area and may be subject to jurisdiction under Section 404 of the Clean Water Act and Section 10 of the Rivers and Harbors Act. A total of 0.248 acres of potentially jurisdictional state wetlands (i.e. one-parameter) are present within the study area, and may be subject to jurisdiction under the California Coastal Commission. Wetland areas within the study area are composed of freshwater wetlands dominated by water smartweed (*Persicaria amphibia*), arroyo willow (*Salix lasiolepis*), small-fruited bulrush (*Scirpus microcarpus*), and perennial rye grass (*Festuca perennis*). These wetlands are all located within portions of the channel bottom of the drainage channel, with the exception of the one-parameter Arroyo willow wetlands on the north side of the drainage channel, which extend up the channel bank. **Appendix A** provides completed data sheets for the study area. **Appendix B** provides representative photographs.

The drainage channel feature adjacent to the property at 505 San Pedro Avenue is a man-made constructed feature, that is highly degraded due to construction and ongoing maintenance of a City of Pacifica sewer line that runs underneath the feature. The channel has been used as an illegal dumping area for decades and refuse such as gas cans, mattresses, appliances, plastic garbage, concrete rubble, bricks, and other refuse are present within the channel and buried within the soil.

In the city of Pacifica, construction projects within the coastal zone are regulated through the City's Local Coastal Land Use Plan (LCLUP). The City regulates construction projects through the LCLUP, to bring projects into conformance with the California Coastal Act of 1976.

The LCLUP states that "As a general rule, a buffer of at least 100 feet measured from the outward edge of riparian vegetation would be appropriate unless such a width is determined to be unnecessary for protecting the resources of the habitat area". The California Coastal Commission has required buffers of 100 feet from the edge of riparian vegetation in areas where such buffers are feasible. However, it is not unusual for the Commission to allow smaller buffers in urbanized areas where the existing land use patterns do not allow for increased riparian buffer areas.

Based on the existing condition of the drainage channel, and the setback distances, the proposed project would not present a source of physical, chemical or biological disturbance to the wetland habitats including the arroyo willow stand (AW-1). Additional measures to ensure the channel is not impacted by construction activities would include planting of native plant species suitable for the boundary area adjacent to the channel, and installation of appropriate erosion/ sediment controls such as silt fencing, fiber rolls, and erosion control blankets along the top of the bank. These measures would be suitable to protect the resource and improve the quality of this resource.

Any economic use of the subject property would result in a reduction of the recommended 100-foot buffer because of the proximity of any development on the property to wetland habitat. The CCC has established precedent by issuing permits allowing even more intensive uses that resulted in direct impacts to sensitive coastal resources, consistent with the mandate of Coastal Act § 30010 that prevents taking of private property without compensation (see CCC Appeal Numbers A-2-SMC-11-040 & A-2-SMC-11-041 concerning a controversial project near Half Moon Bay that was ultimately approved).

These conclusions should be regarded as preliminary and subject to verification by the U.S. Army Corps of Engineers prior to performing any work that would impact wetland resources on site.

2. SETTING

2.1 SITE DESCRIPTION

The study area encompasses approximately 1.6 acres of land located at 505 San Pedro Avenue (project site) and the drainage channel adjacent to the property in Pacifica, California. The applicant (Shawn Rhodes) is proposing to develop the parcel at 505 San Pedro Avenue, which is 0.86 acres. The adjacent drainage channel is 0.74 acres. The drainage channel is located to the west of the property within an unaccepted city right of way. This delineation was conducted to provide additional information on the drainage channel, in response to California Coastal Commission letter dated July 2, 2019 regarding Coastal Development Permit (CDP) Application Number 2-19-0026 (construction of a mixed-use scheme, including three buildings, a skate park, and a parking lot in Pacifica).

The site is bordered by the Pedro Point Shopping Center to the East, San Pedro Avenue to the south, and residential properties to the north. The area is highly developed, and the property is surrounded by residential and commercial developments on all sides. The Pacific Ocean is located approximately 210 feet to the northwest. Topography on the project site is variable, as is located on an elevated berm-like feature. The top of the berm runs southwest-northeast through the approximate center of the property, and slopes downwards towards the drainage channel on the west side and the shopping center on the east side. Elevations at the study area range from approximately 14 to 23 feet. **Figure 1** shows the project boundaries and location. Photographs of the project site can be found in **Appendix B**.

The drainage channel was created most likely as an irrigation ditch for farming prior to the 1950's. The City of Pacifica constructed a sewer line below the channel, with sewer manholes in two locations within the channel, at some point later (in the 1960's possibly). The channel bed and banks are categorized as 'urban' soil type due the history of disturbance to the channel and its location adjacent to a 5-acre commercial shopping center and parking lot. Urban runoff from the local community of Pedro Point flows into the channel which then empties through a culvert and into San Pedro Creek on the north side of the 505 San Pedro Avenue property.

2.2 PROJECT DESCRIPTION

The property (APN 023-72-010) is located on San Pedro Avenue in Pacifica, California. The property is 0.86 acres in size (37,273 ft.²) and is located on the west side of Highway 1 in the Pedro Point area. The site is located within the coastal zone and is subject to the City of

Pacifica's Local Coastal Land Use Plan. The property is zoned as commercial and is within the Pedro Point – Shelter Cove Land Use Plan Area, and is outside of any special areas delineated in the Local Coastal Land Use Plan (City of Pacifica, 1992). The site is a narrow, rectangular strip of land (755 feet long x 55 feet wide) and is bounded by San Pedro Road on the south, a drainage channel and open field on the west, a strip mall/shopping area to the east and a parking lot on the north. San Pedro Creek and the Pacific Ocean are located further to the north, and northwest of the parking lot. The surrounding area is single family residential homes and small businesses.

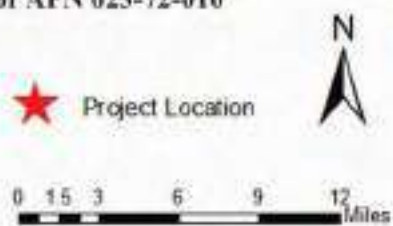
The project intends to develop a currently vacant lot into commercial and residential buildings. The development will consist of a 2-story surf shop building with storage basement (3,500 ft²), a skatepark enclosed within chain-link fencing and a roof (4,730 ft²), a 2-story storage building for the surf shop (1,540 ft²), 2 parking lot areas (16,513 ft²), a 2-story building with retail space at the lower level and 2 residential units above (2,516 ft²), and various areas of landscaping (7,302 ft²). The project would be constructed within an upland area that is behind an existing shopping center, and would include a public access easement (pedestrian trail) that would extend along the western boundary of the site, along the top of bank of an adjacent drainage channel. The project area and adjacent drainage channel have been heavily disturbed by grading activities in the past. The adjacent drainage channel would not be directly impacted by the proposed project.

This wetland delineation was conducted on the adjacent drainage channel, which is designated as an unaccepted right of way (identified as 'Chester Way') on the most current San Mateo County Assessor's parcel map.



Figure 1: Project Location for APN 023-72-010

Source: ESRI 2014
USGS 2011



2.3 VEGETATION

Vegetation at the study site (drainage channel) can be categorized into several different natural communities based upon plant species composition. The boundaries between communities can be distinct, or can change gradually over an area. Due to the semi-developed nature of the project site, vegetation types in this analysis are based upon, but do not strictly follow, species alliances described by the California Native Plant Society (CNPS) Manual of California Vegetation. Natural communities on the site include arroyo willow thicket, coastal brambles, eucalyptus grove, kikuyu grass sward, Monterey cypress stand, perennial rye grass fields, small-fruited bulrush marsh, smartweed patch, upland mustards/ruderal and ornamental.

2.3.1 Arroyo Willow Thicket

The arroyo willow thicket community is dominated by arroyo willow (*Salix lasiolepis*). This plant community is found within the drainage at the northeast terminus of the drainage. It is comprised of dense arroyo willow trees. Arroyo willows are a facultative wetland (FACW) plant, found more frequently in wetlands than outside of them.

2.3.2 Coastal Brambles

The coastal brambles plant community is characterized as being heavily dominated by brambles (*Rubus sp.*). Within the study area, this plant community is primarily made up of dense California blackberry (*Rubus ursinus*) vines, with the ornamental species multiflora rose (*Rosa multiflora*) and California privet (*Ligustrum ovalifolium*) occasionally present at lower densities. The coastal brambles plant community is found along the banks of the drainage channel, sometimes extending into the channel itself. California blackberry is a Facultative plant (FAC), found equally often in wetland and upland habitats. Multiflora rose and California privet are considered upland species (UPL). Due to the prevalence of dominant upland species within this habitat, it is not considered a wetland.

2.3.3 Eucalyptus Grove

Two groves of mature blue gum (*Eucalyptus globulus*) trees are present at the western and southwestern portions of the study area. Large blue gum trees make up the overstory of this community, while the understory is primarily composed of eucalyptus duff and English ivy (*Hedera helix*). Blue gum is an upland (UPL) species, and English ivy is considered a Facultative Upland (FACU) species more likely to be found in upland habitats.

2.3.4 Kikuyu Grass Sward

Swards of the invasive Kikuyu grass (*Pennisetum clandestinum*) are present within the bottom of the drainage channel. These areas are completely dominated by Kikuyu grass with no other vegetation present. This species is considered a Facultative Upland (FACU) plant, being found more often in upland habitats. The presence of Kikuyu grass indicates that there is unlikely to be significant soil inundation (and thus wetland habitat) in this portion of the drainage channel.

2.3.5 Monterey Cypress Stand

One stand of Monterey cypress (*Hesperocyperus macrocarpa*) is present within the study area along the western bank of the channel. Vegetative cover within this stand is entirely made up of Monterey cypress, as the density of the trees prevents any understory vegetation from growing beneath them. Monterey cypress is ranked UPL.

2.3.6 Ornamental

The ornamental vegetation community is made up of non-native ornamental plant species that are not widespread enough in natural areas to possess a community designation. Within the study site, areas of ornamental vegetation are dominated by garden nasturtium (*Tropaeolum majus*), English ivy (*Hedera helix*), or cape ivy (*Delairea odorata*). Where present, each species provides nearly 100 percent of the vegetative cover. These areas heavily dominated by non-native vegetation are primarily found along the eastern bank of the drainage channel. All of these plants are considered upland species.

2.3.7 Perennial Rye Grass Fields

This plant community is dominated by perennial rye grass (*Festuca perennis*). Individual curly and green dock (*Rumex crispus*/*Rumex conglomeratus*) plants are also present at lower densities. Perennial fescue is a Facultative wetland plant (FAC), equally likely to be found inside or outside of wetland habitats. Curly dock is also a FAC plant, while green dock is considered a FACW plant.

2.3.8 Small-fruited Bulrush Marsh

This plant community is dominated by small-fruited bulrush (*Scripus microcarpus*). One small patch of these plants is present within the drainage channel, where they make up 100 percent of the vegetative cover. Small-fruited bulrush is an Obligate wetland species (OBL), only being found within wetland habitats.

2.3.9 Smartweed Patch

This plant community is primarily dominated by smartweed (*Persicaria sp.*). Within the study area, this community is dominated by water smartweed (*Persicaria amphibia*), a wetland obligate species (OBL). Other plant species observed growing beneath and around the smartweed include silverweed cinquefoil (*Potentilla anserina*), dock (*Rumex sp.*), and California blackberry (*Rubus ursinus*). These plants are only found within the wetter portions of the drainage channel.

2.3.10 Upland Mustards and Ruderal Forbs

This plant community is dominated by non-native mustards and other invasive species. Within the study area, this habitat is heavily dominated by wild radish (*Raphanus sativus*), which dominates the vegetative cover along the eastern bank/berm and upland portions of the site. Small patches of fennel (*Foeniculum vulgare*) can also be found within this community. These plants are designated as upland (UPL) species.

2.4 SOILS

Only one soil type is present within the study area: Urban land. Urban land is defined by the USDA NRCS as areas where 85% or more of the ground surface is covered by asphalt, concrete, buildings, and other structures (USDA SCS 1991). **Appendix C** provides a soils map of the study area.

2.5 HYDROLOGY

The project site consists of a vacant lot and does not contain any watercourses or wetland habitats. Aquatic features within a 100-meter radius of the project site include the Pacific Ocean, San Pedro Creek (approximately 75 meters northeast of the site), and an intermittent drainage channel on the west side of the project site.

The drainage channel was created most likely as an irrigation ditch for farming prior to the 1950's. At some point later (in the 1960's possibly), the City of Pacifica constructed a sewer pipe that runs below the open channel for most of the channel's length. Two sewer manholes are located in the channel bottom. During rain events, urban stormwater runoff from the local community of Pedro Point flows into the channel which then empties through a culvert into San Pedro Creek to the north side of the property.

3. METHODOLOGY

This wetland delineation was conducted in accordance with the USACE 1987 *Corps of Engineers Wetlands Delineation Manual* along with the USACE 2008 *Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Western Mountains, Valleys, and Coast Region*. A Level 3 Determination (i.e., a combination of onsite inspection and aerial review) was conducted as defined in the *Wetland Delineation Manual*.

The location of the project site is within the boundary zone between the Arid West Region and the Western Mountains, Valleys, and Coast Region. The climatic conditions and vegetation in Pacifica overlaps with what is described in both supplements. Both regional supplements include coastal areas, and a reasonable justification could be made to support the use of either supplement. The Western Mountains regional supplement was chosen as the appropriate manual based on vegetation and climate; including the following:

Arid West: Generally hot and dry with long summer dry season. Average annual precipitation mostly <15", except along the coast. Most precipitation falls as rain.

Western Mountains, Valleys and Coast: Cooler and more humid with a shorter dry season. Average annual precipitation mostly >20" except near the coast. Much of the annual precipitation falls as snow, particularly at higher elevations.

Average annual precipitation in Pacifica is approximately 32"¹. Due to heavy fog during the summertime especially, the amount of water available to vegetation is much greater due to fog drip.

3.1 DEFINITION OF TERMS

The following section provides key definitions of terms used in this report that are relevant to the delineation of wetlands and other waters of the US.

Waters of the United States: Title 33, Chapter II, Part 328.3 of the Code of Federal Regulations defines waters of the United States as:

- (1) All waters which are currently used, were used in the past, or may be susceptible to use in interstate or foreign commerce, including all waters which are subject to the ebb and flow of the tide;
- (2) All interstate waters including interstate wetlands;

¹ <https://www.ncdc.noaa.gov/cdo-web/datatools/normal>s

- (3) All other waters such as intrastate lakes, rivers, streams (including intermittent streams), mud flats, sand flats, wetlands, sloughs, prairie potholes, wet meadows, playa lakes, or natural ponds, the use, degradation, or destruction of which could affect interstate or foreign commerce including any such waters:
 - a. which are or could be used by interstate or foreign travelers for recreational or other purposes;
 - b. or from which fish or shellfish are or could be taken and sold in interstate or foreign commerce;
 - c. or which are used or could be used for industrial purposes by industries in interstate commerce;
- (4) All impoundments of waters otherwise defined as waters of the United States under the definition;
- (5) Tributaries of waters identified in paragraphs (1) through (4);
- (6) Territorial seas; and
- (7) Wetlands adjacent to waters (other than waters that are themselves wetlands) identified in paragraphs (1) through (6).

Federal Definition of Wetlands: In Title 33, Chapter II, Part 328.4 of the Code of Federal Regulations, wetlands are defined as: “Those areas that are inundated or saturated by surface or ground water at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions. Wetlands generally include swamps, marshes, bogs, and similar areas.” For the purposes of a USACE wetland delineation, an area must meet three diagnostic environmental characteristics in order to be considered a wetland. These three characteristics include the presence of hydrophytic vegetation, hydric soils, and wetland hydrology.

Hydrophytic Vegetation: The USACE 1987 *Wetland Delineation Manual* describes hydrophytic vegetation as “sum total of macrophytic plant life that occurs in areas where the frequency and duration of inundation or soil saturation produce permanently or periodically saturated soils of sufficient duration to exert a controlling influence on the plant species present. The vegetation occurring in a wetland may consist of more than one plant community (species association). Emphasis is placed on the assemblage of plant species that exert a controlling influence on the character of the plant community, rather than on indicator species.”

Hydric Soil: Defined by the USACE *Western Mountains Supplement* as “a soil that formed under conditions of saturation, flooding, or ponding long enough during the growing season to develop anaerobic conditions in the upper part. Most hydric soils exhibit characteristic morphologies that result from repeated periods of saturation or inundation for more than a few days...These processes result in distinctive characteristics that persist in the soil during both wet and dry periods.”

Wetland Hydrology: The USACE 1987 *Wetland Delineation Manual* describes wetland hydrology as “all hydrologic characteristics of areas that are periodically inundated or have soils saturated to the surface at some time during the growing season. Areas with evident characteristics of wetland hydrology are those where the presence of water has an overriding influence on characteristics of vegetation and soils due to anaerobic and reducing conditions, respectively.”

Navigable Waters of the United States: Title 33, Chapter II, Part 329.4 of the Code of Federal Regulations defines navigable waters of the U.S. as “those waters subject to the ebb and flow of the tide and/or are presently used, or have been used in the past, or may be susceptible for use to transport interstate or foreign commerce. A determination of navigability, once made, applies laterally over the entire surface of the waterbody, and is not extinguished by later actions or events which impede or destroy navigable capacity.” For the purposes of a USACE jurisdictional determination, navigable waters of the United States are considered Traditionally Navigable Waters.

Ordinary High Water Mark (OHWM): Title 33, Chapter II, Part 328.3 of the Code of Federal Regulations defines the OHWM as “that line on the shore established by the fluctuations of water and indicated by physical characteristics, such as a clear, natural line impressed on the bank, shelving, changes in the character of the soil, destruction of terrestrial vegetation, the presence of litter or debris, or other appropriate means that consider the characteristics of the surrounding area.”

Mean High Water (MHW): Section 10 of the Rivers and Harbors Act (RHA), which regulates certain activities in navigable waters of the U.S., defines the landward limit of Section 10 jurisdiction as the Mean High Water (MHW) mark. The MHW mark, with respect to ocean and coastal waters, is defined as: “The line on the shore established by the average of all high tides. It is established by survey based on available tidal data (preferably averaged over a period of 18.6 years because of the variations in tide). In the absence of such data, less precise methods to determine the mean high water mark are used, such as physical markings, lines of vegetation or comparison of the area in question with an area having similar physical characteristics for which tidal data are readily available.”

In the case of non-tidal waters regulated by the RHA, the MHW is defined as the OHWM.

State Definition of Wetlands: The State defines wetlands more broadly than the federal wetlands program by recognizing that wetlands may have evidence of only one of the three federal parameters. The State definition also conforms to the USFWS definition:

“Wetlands are lands transitional between terrestrial and aquatic systems where the water table is usually at or near the surface or the land is covered by shallow water. For purposes of this classification, wetlands must have one or more of the following three attributes: (1) at least periodically, the land supports hydrophytes, (2) the substrate is

predominantly undrained hydric soil; and (3) the substrate is non-soil and is saturated with water or covered by shallow water at some time during the growing season of each year" (Cowardin, 1979).

Additionally, for the purposes of identifying Environmentally Sensitive Habitat Areas (ESHA) regulated by the California Coastal Commission, the California Coastal Act of 1976 further specifies that wetlands are:

“Land where the water table is at, near, or above the land surface long enough to promote the formation of hydric soils or to support the growth of hydrophytes, and shall also include those types of wetlands where vegetation is lacking and soil is poorly developed or absent as a result of frequent and drastic fluctuations of surface water levels, wave action, water flow, turbidity or high concentrations of salts or other substances in the substrate. Such wetlands can be recognized by the presence of surface water or saturated substrate at some time during each year and their location within, or adjacent to, vegetated wetlands or deep-water habitats” (CCR Title 14, Section 13577).

Although the State definition may require only a single parameter to establish the presence of wetlands (and ESHA), in practice, such decisions are based on a case-by-case interpretation of data that either support or disprove the presumption of whether wetlands are indicated by a single parameter.

3.2 REGULATORY SETTING

3.2.1 U.S Army Corps of Engineers

The US Army Corps of Engineers (USACE) regulates activities that result in the discharge of dredged or fill materials into waters of the U.S. including wetlands, under Section 404 of the Clean Water Act. USACE also regulates dredging, filling, and construction activities in navigable waters under Section 10 of the Rivers and Harbors Act. Activities involving dredged or filled materials require a Section 404 permit, and/or a Section 10 permit, issued by the USACE. Section 404 projects may be authorized under general permits, also known as nationwide permits, or may require individual permits in the case of more complex projects that exceed the threshold for impacts under the nationwide permits.

3.2.2 California Coastal Commission

The California Coastal Commission (CCC) exercises jurisdiction over development activities within the coastal zone. In the city of Pacifica, construction projects within the coastal zone are regulated through the City’s Local Coastal Land Use Plan (LCLUP). The City regulates construction projects through the LCLUP, to bring projects into conformance with the California Coastal Act of 1976.

The project site is within the Pedro Point/ Shelter Cove Land Use Plan area, and is not located within a designated environmentally sensitive wetland area (LCLUP 1992). However, in the Plan Conclusions section, under Development Near Wetlands and Creeks; the LCLUP states:

“Riparian vegetation along all intermittent and year-round creeks shall be protected, enhanced and restored where feasible, and buffer zones required.”; And; “As a general rule, a buffer of at least 100 feet measured from the outward edge of riparian vegetation would be appropriate unless such a width is determined to be unnecessary for protecting the resources of the habitat area”

3.2.3 California Department of Fish and Wildlife

The California Department of Fish and Wildlife (CDFW) regulates projects that will:

- (1) substantially divert or obstruct the natural flow of any river, stream or lake;
- (2) substantially change or use any material from the bed, channel, or bank of, any river, stream, or lake; or
- (3) deposit or dispose of debris, waste, or other material containing crumbled, flaked, or ground pavement where it may pass into any river, stream, or lake. (Section 1602, California Fish and Game Code)

To complete projects which will affect these characteristics of any river, stream, or lake, within the state of California, projects must apply for a Lake or Streambed Alteration Agreement (Section 1600 Series Permit). The jurisdictional boundary of the CDFW typically follows the top-of-bank or the outermost edge of riparian vegetation adjacent to the regulated stream, river, or lake.

3.2.4 Regional Water Quality Control Board

The Regional Water Quality Control Board (RWQCB) has authority over projects that could result in negative impacts to waters of the State and wetlands. The RWQCB, defines “waters of the State” as any surface water or groundwater, including saline waters within the boundaries of the State of California (Cal. Water Quality Control, Division 7, January 2011). In addition, it defines “water quality control” as the regulation of any activity that may affect the quality of the waters of the State, and includes the prevention and correction of water pollution and nuisance.

Under the Porter-Cologne Water Quality Control Act, the RWQCB is authorized to regulate the discharge of waste that could affect the quality of State waters. Regulated discharges include any substances associated with human habitation that are harmful to the aquatic environment, including stormwater runoff associated with construction projects and other activities that could discharge soil, pollutants, or other materials into waters of the State. Projects that could produce pollutants or discharge into waters of the state must apply for a Section 401 Certification from

the California Regional Water Quality Control Board to ensure that any discharges will be in compliance with California's water quality standards.

3.3 DELINEATION METHODS

This wetland delineation was conducted through the analysis of aerial photography, historical records, and other relevant data sources, as well as an onsite survey to characterize vegetation, soils, and hydrology.

3.4 LITERATURE REVIEW

Prior to the field survey, aerial photographs were reviewed for current and historical data on lake levels and vegetation. Soil types were assessed using the online *USDA Natural Resource Conservation Science Web Soil Survey* (NRCS 2019). Historical and current land use data was accessed from various sources, including historical aerial photographs (UCSB 2019).

3.5 FIELD SURVEY

The field delineation for the study area was conducted by Patrick Kobernus of Coast Ridge Ecology on October 21, 2019. Wetland vegetation was mapped by P. Kobernus and CRE Biologist Greg Pfau on September 18, 2019. Weather conditions at the time of the field visits included clear skies, temperatures in the 70's (°F), and no wind. The onsite inspection evaluated the three parameters that identify and delineate the boundaries of jurisdictional wetlands, including (1) the dominance of wetland vegetation; (2) the presence of hydric soils; and (3) hydrologic conditions that result in periods of inundation or saturation on the surface from flooding or ponding.

Survey methods follow the protocol outlined in the 1987 USACE *Wetland Delineation Manual for Areas Less Than Five Acres in Size*. GPS coordinates of each sample location were recorded in the field with a Trimble GeoExplorer 6000 series unit. Vegetation, soils and hydrology data were taken at each of these points. The completed *Wetland Determination Data Forms for the Western Mountains Region* are located in **Appendix A**.

3.5.1 Vegetation Data Collection

Vegetation data was collected at each sample point taken during the field survey. As per the 1987 *Wetland Delineation Manual* and the 2010 *Western Mountains, Valleys and Coast* Regional Supplement, plants in the tree stratum are defined as woody plants with a diameter three inches or more at breast height (DBH). Saplings/shrubs are defined as woody plants with a diameter of less than three inches DBH, and herbs are defined as non-woody plants regardless of size. Species type and percent dominance of each species was recording at each sample point. The USACE *National Wetland Plant List* was used to determine the wetland indicator status of

plants observed in the study area. Wetland indicator status refers to the probability that a plant will occur within a wetland or upland area. The indicator status categories are defined as follows:

- *Obligate (OBL)*: almost always occurs in wetlands
- *Facultative wetland (FACW)*: usually occurs in wetlands, sometimes may occur in uplands
- *Facultative (FAC)*: equally likely to occur in wetlands or nonwetlands
- *Facultative upland (FACU)*: usually occurs in uplands but may occasionally occur in wetlands
- *Obligate upland (UPL)*: almost never occurs in wetlands
- *No indicator (NI)/ No status (NS)*: no indicator or status assigned due to lack of information

The presence of hydrophytic vegetation data was then determined using the dominance test and prevalence index described in the USACE *Wetland Delineation Manual* and *Western Mountains Regional Supplement*.

3.5.2 Soils

Soil pits were taken at each of the eight sample point sites. Soil pits were excavated to the maximum depth possible and soil color and texture was assessed and recorded onto the Western Mountains data sheets. Soil color was determined by matching samples to Munsell Soils Color Charts (Munsell Colors 2000). Soils were then assessed for hydric features described in the *Western Mountains Regional Supplement*, such as the presence of redoxomorphic concentrations, mucky soils or hydrogen sulfide odor.

3.5.3 Hydrology

Hydrology at each of the sample points was assessed based upon the USACE *Western Mountains, Valleys, And Coast Region* hydrology guidelines. Positive hydrological indicators include the presence of a visible water table, saturation and/or muck, water marks or drift deposits.

3.6 FEDERAL WETLAND BOUNDARY DETERMINATION

A preliminary wetland boundary line, based on the 3-parameter wetland definition was determined based on data points and vegetation mapping. Based upon the location of wetland versus non-wetland sample points, the wetland boundary was determined to correspond to specific discrete locations within the channel bottom (**Figure 2**).

3.6.1 Acreage Calculations

The area for each individual vegetation polygon within the wetland boundary was calculated in ArcMAP 10.2. All vegetation areas were then added to obtain a total area for wetlands within the study area.

3.7 STATE WETLAND BOUNDARY DETERMINATION

The state definition of wetlands requires only a single parameter to be met in order to indicate the presence of wetlands. Hydrophytic vegetation, hydric soils, or wetland hydrology were used to determine the state upland wetland boundary.

Areas of wetland vegetation were identified and mapped using a Trimble GeoExplorer 6000 unit. Vegetation units were mapped based upon the dominant species.

Areas of hydric vegetation were defined using the dominance test, and by assessing the indicator status of the dominant species. Vegetation defined as obligate or facultative wetland by the USACE *National Plant List* was mapped as wetland vegetation.

Wetland acreage was determined using the methods described in Section **3.6.1 Acreage Calculation**.

4. RESULTS

4.1 FEDERAL WETLANDS

A total of 0.088 acres of potential federally jurisdictional wetlands occur within the delineation study area. **Table 1** provides the calculations for the total acreage for wetland areas within the study area. Jurisdictional areas lie within the vegetated central portions of the drainage channel. These areas are within the primary flow of the channel, where the soil remains saturated even after water is no longer visible at the surface. Wetland areas are represented by sample points A2 and A4 within the study area. **Figure 2** provides an illustration of potentially jurisdictional wetlands within the study area. **Appendix B** provides representative photographs of the sample points and study area.

TABLE 1: TOTAL ACREAGE OF WETLAND AREAS WITHIN STUDY AREA

Wetland Type	Federal		State	
	Area (acres)	Area (sq ft)	Area (acres)	Area (sq ft)
Arroyo Willow Wetland				
AW-1	0.025	1109.560	0.096	4193.311
Perennial Rye Grass Wetland				
PR-1	0.010	437.146	0.001	35.026
Small-fruited Bulrush Marsh				
BM-1	0.003	116.769	0.003	120.651
Smartweed Wetland				
SW-1	0.012	508.292	0.004	161.820
SW-2	0.019	833.803		
SW-3	0.019	844.048	0.022	963.699
<i>subtotal</i>	<i>0.050</i>	<i>2186.143</i>	<i>0.026</i>	<i>1125.519</i>
Ephemeral Channel				
FC-1			0.106	4605.914
Wetted Channel				
WC-1			0.017	722.949
Total	0.088	3849.618	0.248	10803.370



Figure 2: Federal and State Wetlands

505 San Pedro Avenue, Pacifica, CA

Service Layer Credits: Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community



Legend

Site Parcel Boundary

Delineation Point

Waters of the State/State Wetland

Wetted Channel

Federal Wetlands

Arroyo Willow Thicket
Perennial Rye Grass Fields
Small-fruited Bulrush Marsh
Smartweed Patch

State Wetlands

Arroyo Willow Thicket
Perennial Rye Grass Fields
Small-fruited Bulrush Marsh
Smartweed Patch
Flow Channel

2-19-0026

Exhibit 5

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4.1.1 Vegetation

Freshwater wetlands on the study site are composed of a variety of plant species. Areas with the greatest water availability, at the northern end of the drainage, are dominated by arroyo willow and small-fruited bulrush. Wetlands within the primary flow of the channel are dominated by water smartweed and perennial rye grass, with curly and green dock also present at lower densities. Silver weed cinquefoil (*Potentilla anserina*) (OBL) can also be found here beneath the smartweed.

4.1.2 Soils

Within the wetland sample points, soils tended to be dark brown and homogenous with a color matrix of 10YR 3/1 at sample points A2 and A4; and 5YR 3/2 at sample point A1; and 5YR 3/3 at sample point A3. Soil texture ranged from sandy loam at sample points A1, A3, and A4 to sandy clay loam at sample point A2. Several unusual soil compositions were noted at the study site within the channel, due to the site being graded in the past, and the site used as an illegal dumping area. Within each of the sample point areas, concrete rubble, brick, plastic and metal refuse were present on the soil surface and/or within the soil. Soils determined to be wetland soils were based on one indicator (redox dark surface), likely due to a lack of ponding in the channel during most times of year. In addition, dark parent materials and the fact that the drainage feature has only been in existence for a few to several decades likely limits the formation of more hydric soil indicators.

4.1.3 Hydrology

Wetland hydrology indicators at sample points A2 and A4 included mud cracks at the surface of the channel bottom (**Photo 9** in **Appendix B**). No other hydrology indicators were present. No ordinary high water mark was visible in the channel, likely due to a lack of flow through the channel at most times of year.

4.2 STATE WETLANDS

A total of 0.248 acres of potential state jurisdictional wetlands occur within the delineation study area. The acreage of state wetlands exceeds that of the federal wetlands since determination state wetlands is based upon only one parameter (hydrophytic vegetation or hydric soils or wetland hydrology) rather than the presence of all three required by the federal wetland definition. **Table 1** provides the calculations for the total acreage for state and federal wetland areas within the study area.

The entire portion of the channel exhibiting hydrology features was mapped and designated as FC-1. This area qualifies as a state wetland due to hydrology and soil indicators, but vegetation is either lacking or composed of upland plant species in many places. Areas where the hydrophytic vegetation is dominant within the channel satisfy the criteria for federal wetlands.

4.3 ENVIRONMENTALLY SENSITIVE HABITAT AREAS (ESHA)

The CCC defines an ESHA as an 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.” (California Coastal Act §30107.5). The CCC Guidelines contain definitions for specific types of ESHAs, including: wetlands, estuaries, streams and rivers, lakes, open coastal waters and coastal waters, riparian habitats, other resource areas, and special-status species and their habitats. For the purposes of this report, ESHAs include any areas that may meet the definition of any ESHA defined by the CCC guidelines or the City of Pacifica LCLUP. A “special-status natural community” is a natural habitat community that is unique in its constituent components, restricted in distribution, supported by distinctive soil conditions, considered locally rare, potentially supporting special-status plant or wildlife species, and/or that receives regulatory recognition from municipal, county, state, and/or federal entities such as the California Natural Diversity Database (CNDDDB). Within the study area, the arroyo willow stand is consistent with the description of Arroyo willow thickets (61.201.01 – *Salix lasiolepis*), which is listed by CDFW as sensitive plant community. This species is common in coastal California and does not have a rarity ranking. However, based on this classification and that it is often associated with riparian habitat, the arroyo willow stand, would be considered an ESHA. Discrete portions of the drainage channel where one or more wetland parameters are present would also be considered an ESHA.

RECOMMENDATIONS

The proposed project would not result in direct or indirect, temporary or permanent impacts to wetlands, other waters, or any ESHA's. The drainage channel feature adjacent to the property at 505 San Pedro Avenue appears to be a man-made constructed feature, that is highly degraded due to construction and ongoing maintenance of a City of Pacifica sewer line that runs underneath the feature. The channel has been used as an illegal dumping area for decades and refuse such as gas cans, mattresses, appliances, plastic garbage, concrete rubble, bricks, and other refuse are present within the channel and buried within the soil.

The project as proposed would create a retaining wall and public access easement (pedestrian trail) along the western property boundary, and the following setbacks from the wetlands are shown in **Table 2**.

TABLE 2. STATE AND FEDERAL WETLANDS AND SETBACK DISTANCES FROM PROPOSED PROJECT AT 505 SAN PEDRO AVENUE, PACIFICA, CA

Name	Wetland Type	From Retaining Wall/Trail		From Structures (approximate)	
		Distance to closest point(ft)	Distance (ft) max to near edge	Distance to closest point (ft)	Distance (ft) max to near edge
AW-1	Federal Wetland	4.10	13.34	32.9	84.7
AW-1	State Wetlands	0.00	0	29.31	63
BM-1	Federal Wetland	12.47	13.7	26.9	33.67
BM-1	State Wetland	6.16	10.5	23.17	31.5
FC-1	State Wetland	6.35	18.45	19.4	26.3
PR-1	State Wetland	10.86	12.8	23.46	26.19
PR-1	Federal Wetland	12.79	15.7	26.36	28.18
SW-1	State Wetland	2.31	7	15.31	19.95
SW-1	Federal Wetland	5.52	10.4	17.85	25.59
SW-2	Federal Wetland	8.51	21.4	20.61	33.4
SW-3	State Wetlands	0.00	6.13	8.67	18.64
SW-3	Federal Wetland	7.66	12.3	20.9	24.5
WC-1	State Wetland	0.00	5.5	10.06	22

The LCLUP states that “As a general rule, a buffer of at least 100 feet measured from the outward edge of riparian vegetation would be appropriate *unless such a width is determined to be unnecessary for protecting the resources of the habitat area*”. The California Coastal Commission has required buffers of 100 feet from the edge of riparian vegetation in areas where such buffers are feasible. However, it is not unusual for the Commission to allow smaller buffers in urbanized areas where the existing land use patterns do not allow for increased riparian buffer areas.

Based on the existing condition of the drainage channel, and the setback distances, the proposed project would not present a source of physical, chemical or biological disturbance to the wetland habitats including the arroyo willow stand (AW-1). Additional measures to ensure the channel is not impacted by construction activities would include planting of native plant species suitable for the boundary area adjacent to the channel, and installation of appropriate erosion/ sediment controls such as silt fencing, fiber rolls, and erosion control blankets along the top of the bank. These measures would be suitable to protect the resource and improve the quality of this resource.

Any economic use of the subject property would result in a reduction of the recommended 100-foot buffer because of the proximity of any development on the property to wetland habitat. The CCC has permitted more intensive uses that resulted in direct impacts to sensitive coastal resources, consistent with the mandate of Coastal Act § 30010 that prevents taking of private property without compensation (see CCC Appeal Numbers A-2-SMC-11-040 & A-2-SMC-11-041)² concerning a controversial project near Half Moon Bay that was ultimately approved).

² <https://documents.coastal.ca.gov/reports/2013/12/W18a-12-2013.pdf>

5. REPORT PREPARATION AND REFERENCES

5.1 REPORT PREPARATION

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Field work and report preparation were completed by Patrick Kobernus (Senior Biologist) and Greg Pfau (Associate Biologist).

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APPENDIX A

Wetland determination data forms

WETLAND DETERMINATION DATA FORM – Western Mountains, Valleys, and Coast Region

Project/Site: NorCal Surf Shop City/County: Pacifica, SMC Sampling Date: 10/21/2019
 Applicant/Owner: Shawn Rhodes State: CA Sampling Point: A1
 Investigator(s): Patrick Kobernus Section, Township, Range: _____
 Landform (hillslope, terrace, etc.): Channel bank Local relief (concave, convex, none): Convex Slope (%): 50
 Subregion (LRR): California Lat: 37.595406 Long: -122.506549 Datum: NAD83
 Soil Map Unit Name: Urban NWI classification: None

Are climatic / hydrologic conditions on the site typical for this time of year? Yes ☒ No ☐ (If no, explain in Remarks.)
 Are Vegetation ☐, Soil ☐, or Hydrology ☐ significantly disturbed? Are "Normal Circumstances" present? Yes ☒ No ☐
 Are Vegetation ☐, Soil ☐, or Hydrology ☐ naturally problematic? (If needed, explain any answers in Remarks.)

SUMMARY OF FINDINGS – Attach site map showing sampling point locations, transects, important features, etc.

Hydrophytic Vegetation Present?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	Is the Sampled Area within a Wetland? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Hydric Soil Present?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	
Wetland Hydrology Present?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	

Remarks:

Delineation is being done at request of CA Coastal Commission and potential wetland area is adjacent to, but not on, applicant's property.

VEGETATION – Use scientific names of plants.

Tree Stratum	(Plot size: <u>2m r</u>)	Absolute % Cover	Dominant Species?	Indicator Status	Dominance Test worksheet: Number of Dominant Species That Are OBL, FACW, or FAC: <u>0</u> (A) Total Number of Dominant Species Across All Strata: <u>2</u> (B) Percent of Dominant Species That Are OBL, FACW, or FAC: <u>0</u> (A/B)
1.					
2.					
3.					
4.					
					= Total Cover
Sapling/Shrub Stratum	(Plot size: <u>2m r</u>)				Prevalence Index worksheet: Total % Cover of: Multiply by: OBL species <input type="checkbox"/> x 1 = <input type="checkbox"/> FACW species <input type="checkbox"/> x 2 = <input type="checkbox"/> FAC species <input type="checkbox"/> x 3 = <input type="checkbox"/> FACU species <input type="checkbox"/> x 4 = <input type="checkbox"/> UPL species <input type="checkbox"/> x 5 = <input type="checkbox"/> Column Totals: <input type="checkbox"/> (A) <input type="checkbox"/> (B) Prevalence Index = B/A = <input type="checkbox"/>
1.	<u>Ligustrum ovilifolium</u>	<u>20</u>	<u>Y</u>	<u>-NS-</u>	
2.					
3.					
4.					
5.					
					= Total Cover
Herb Stratum	(Plot size: <u>2m r</u>)				Hydrophytic Vegetation Indicators: <input type="checkbox"/> 1 - Rapid Test for Hydrophytic Vegetation <input type="checkbox"/> 2 - Dominance Test is >50% <input type="checkbox"/> 3 - Prevalence Index is ≤3.0 ¹ <input type="checkbox"/> 4 - Morphological Adaptations ¹ (Provide supporting data in Remarks or on a separate sheet) <input type="checkbox"/> 5 - Wetland Non-Vascular Plants ¹ <input type="checkbox"/> Problematic Hydrophytic Vegetation ¹ (Explain) ¹ Indicators of hydric soil and wetland hydrology must be present, unless disturbed or problematic.
1.	<u>Delairea odorata</u>	<u>15</u>	<u>N</u>	<u>-NS-</u>	
2.	<u>Persicaria amphibia</u>	<u>10</u>	<u>N</u>	<u>OBL</u>	
3.	<u>Urtica dioica</u>	<u>5</u>	<u>N</u>	<u>FAC</u>	
4.					
5.					
6.					
7.					
8.					
9.					
10.					
11.					
					= Total Cover
Woody Vine Stratum	(Plot size: <u>2m r</u>)				Hydrophytic Vegetation Present? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
1.	<u>Rubus ursinus</u>	<u>50</u>	<u>Y</u>	<u>FACU</u>	
2.					
					= Total Cover
% Bare Ground in Herb Stratum _____					

Remarks:

2-19-0026

Exhibit 5

SOIL

Sampling Point: A1

Profile Description: (Describe to the depth needed to document the indicator or confirm the absence of indicators.)								
Depth (inches)	Matrix		Redox Features				Texture	Remarks
	Color (moist)	%	Color (moist)	%	Type ¹	Loc ²		
0-16	5YR 3/2	100					Sandy loam	

¹Type: C=Concentration, D=Depletion, RM=Reduced Matrix, CS=Covered or Coated Sand Grains. ²Location: PL=Pore Lining, M=Matrix.

Hydric Soil Indicators: (Applicable to all LRRs, unless otherwise noted.)		Indicators for Problematic Hydric Soils ³ :
<input type="checkbox"/> Histosol (A1)	<input type="checkbox"/> Sandy Redox (S5)	<input type="checkbox"/> 2 cm Muck (A10)
<input type="checkbox"/> Histic Epipedon (A2)	<input type="checkbox"/> Stripped Matrix (S6)	<input type="checkbox"/> Red Parent Material (TF2)
<input type="checkbox"/> Black Histic (A3)	<input type="checkbox"/> Loamy Mucky Mineral (F1) (except MLRA 1)	<input type="checkbox"/> Very Shallow Dark Surface (TF12)
<input type="checkbox"/> Hydrogen Sulfide (A4)	<input type="checkbox"/> Loamy Gleyed Matrix (F2)	<input type="checkbox"/> Other (Explain in Remarks)
<input type="checkbox"/> Depleted Below Dark Surface (A11)	<input type="checkbox"/> Depleted Matrix (F3)	
<input type="checkbox"/> Thick Dark Surface (A12)	<input type="checkbox"/> Redox Dark Surface (F6)	
<input type="checkbox"/> Sandy Mucky Mineral (S1)	<input type="checkbox"/> Depleted Dark Surface (F7)	
<input type="checkbox"/> Sandy Gleyed Matrix (S4)	<input type="checkbox"/> Redox Depressions (F8)	

³Indicators of hydrophytic vegetation and wetland hydrology must be present, unless disturbed or problematic

Restrictive Layer (if present): Type: _____ Depth (inches): _____	Hydric Soil Present? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
--	---

Remarks:
Uniform color to soil, combined with urban fill (concrete, brick, and other refuse)

HYDROLOGY

Wetland Hydrology Indicators:				Secondary Indicators (2 or more required)	
Primary Indicators (minimum of one required; check all that apply)					
<input type="checkbox"/> Surface Water (A1)	<input type="checkbox"/> Water-Stained Leaves (B9) (except MLRA 1, 2, 4A, and 4B)	<input type="checkbox"/> Water-Stained Leaves (B9) (MLRA 1, 2, 4A, and 4B)			
<input type="checkbox"/> High Water Table (A2)	<input type="checkbox"/> Salt Crust (B11)	<input type="checkbox"/> Drainage Patterns (B10)			
<input type="checkbox"/> Saturation (A3)	<input type="checkbox"/> Aquatic Invertebrates (B13)	<input type="checkbox"/> Dry-Season Water Table (C2)			
<input type="checkbox"/> Water Marks (B1)	<input type="checkbox"/> Hydrogen Sulfide Odor (C1)	<input type="checkbox"/> Saturation Visible on Aerial Imagery (C9)			
<input type="checkbox"/> Sediment Deposits (B2)	<input type="checkbox"/> Oxidized Rhizospheres along Living Roots (C3)	<input type="checkbox"/> Geomorphic Position (D2)			
<input type="checkbox"/> Drift Deposits (B3)	<input type="checkbox"/> Presence of Reduced Iron (C4)	<input type="checkbox"/> Shallow Aquitard (D3)			
<input type="checkbox"/> Algal Mat or Crust (B4)	<input type="checkbox"/> Recent Iron Reduction in Tilled Soils (C6)	<input type="checkbox"/> FAC-Neutral Test (D5)			
<input type="checkbox"/> Iron Deposits (B5)	<input type="checkbox"/> Stunted or Stressed Plants (D1) (LRR A)	<input type="checkbox"/> Raised Ant Mounds (D6) (LRR A)			
<input type="checkbox"/> Surface Soil Cracks (B6)	<input type="checkbox"/> Other (Explain in Remarks)	<input type="checkbox"/> Frost-Heave Hummocks (D7)			
<input type="checkbox"/> Inundation Visible on Aerial Imagery (B7)					
<input type="checkbox"/> Sparsely Vegetated Concave Surface (B8)					

Field Observations: Surface Water Present? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Depth (inches): _____ Water Table Present? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Depth (inches): _____ Saturation Present? (includes capillary fringe) Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Depth (inches): _____	Wetland Hydrology Present? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
--	---

Describe Recorded Data (stream gauge, monitoring well, aerial photos, previous inspections), if available:

Remarks:
No hydrologic indicators present.

2-19-0026

Exhibit 5

WETLAND DETERMINATION DATA FORM – Western Mountains, Valleys, and Coast Region

Project/Site: NorCal Surf Shop City/County: Pacifica, SMC Sampling Date: 10/21/2019
 Applicant/Owner: Shawn Rhodes State: CA Sampling Point: A2
 Investigator(s): Patrick Kobernus Section, Township, Range: _____
 Landform (hillslope, terrace, etc.): Channel bed Local relief (concave, convex, none): Concave Slope (%): 0
 Subregion (LRR): California Lat: 37.595406 Long: -122.506549 Datum: NAD83
 Soil Map Unit Name: Urban NWI classification: None
 Are climatic / hydrologic conditions on the site typical for this time of year? Yes ☒ No ☐ (If no, explain in Remarks.)
 Are Vegetation ☐, Soil ☐, or Hydrology ☐ significantly disturbed? Are "Normal Circumstances" present? Yes ☒ No ☐
 Are Vegetation ☐, Soil ☐, or Hydrology ☐ naturally problematic? (If needed, explain any answers in Remarks.)

SUMMARY OF FINDINGS – Attach site map showing sampling point locations, transects, important features, etc.

Hydrophytic Vegetation Present?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	Is the Sampled Area within a Wetland?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Hydric Soil Present?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>			
Wetland Hydrology Present?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>			

Remarks:

Delineation is being done at request of CA Coastal Commission and potential wetland area is adjacent to, but not on, applicant's property.

VEGETATION – Use scientific names of plants.

Tree Stratum	(Plot size: <input type="text"/>)	Absolute % Cover	Dominant Species?	Indicator Status	Dominance Test worksheet: Number of Dominant Species That Are OBL, FACW, or FAC: <input type="text"/> 2 (A) Total Number of Dominant Species Across All Strata: <input type="text"/> 2 (B) Percent of Dominant Species That Are OBL, FACW, or FAC: <input type="text"/> 100 (A/B)
1.					
2.					
3.					
4.					
		= Total Cover			Prevalence Index worksheet: Total % Cover of: <input type="text"/> Multiply by: OBL species <input type="text"/> x 1 = <input type="text"/> FACW species <input type="text"/> x 2 = <input type="text"/> FAC species <input type="text"/> x 3 = <input type="text"/> FACU species <input type="text"/> x 4 = <input type="text"/> UPL species <input type="text"/> x 5 = <input type="text"/> Column Totals: <input type="text"/> (A) <input type="text"/> (B) Prevalence Index = B/A = <input type="text"/>
Sapling/Shrub Stratum	(Plot size: <input type="text"/>)				
1.					
2.					
3.					
4.					
5.					
		20 = Total Cover			
Herb Stratum	(Plot size: <input type="text"/> 2m r)				Hydrophytic Vegetation Indicators: <input type="checkbox"/> 1 - Rapid Test for Hydrophytic Vegetation <input checked="" type="checkbox"/> 2 - Dominance Test is >50% <input type="checkbox"/> 3 - Prevalence Index is ≤3.0 ¹ <input type="checkbox"/> 4 - Morphological Adaptations ¹ (Provide supporting data in Remarks or on a separate sheet) <input type="checkbox"/> 5 - Wetland Non-Vascular Plants ¹ <input type="checkbox"/> Problematic Hydrophytic Vegetation ¹ (Explain) ¹ Indicators of hydric soil and wetland hydrology must be present, unless disturbed or problematic.
1.	<u>Pericaria amphibia</u>	35	Y	OBL	
2.	<u>Rubus crispus</u>	55	Y	FAC	
3.	<u>Scirpus microcarpus</u>	5	N	OBL	
4.	<u>Potentilla anserina</u>	5	N	OBL	
5.					
6.					
7.					
8.					
9.					
10.					
11.					
		100 = Total Cover			
Woody Vine Stratum	(Plot size: <input type="text"/>)				Hydrophytic Vegetation Present? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
1.					
2.					
		= Total Cover			
% Bare Ground in Herb Stratum <input type="text"/>					

Remarks:

2-19-0026

Exhibit 5

Sampling Point: A2

[illegible]

HYDROLOGY

Wetland Hydrology Indicators:				Wetland Hydrology Indicators:	
Primary Indicators (minimum of one required; check all that apply)				Secondary Indicators (2 or more required)	
<input type="checkbox"/> Surface Water (A1)				<input type="checkbox"/> Water-Stained Leaves (B9) (except MLRA 1, 2, 4A, and 4B)	<input type="checkbox"/> Water-Stained Leaves (B9) (MLRA 1, 2, 4A, and 4B)
<input type="checkbox"/> High Water Table (A2)				<input type="checkbox"/> Salt Crust (B11)	<input type="checkbox"/> Drainage Patterns (B10)
<input type="checkbox"/> Saturation (A3)				<input type="checkbox"/> Aquatic Invertebrates (B13)	<input type="checkbox"/> Dry-Season Water Table (C2)
<input type="checkbox"/> Water Marks (B1)				<input type="checkbox"/> Hydrogen Sulfide Odor (C1)	<input type="checkbox"/> Saturation Visible on Aerial Imagery (C9)
<input type="checkbox"/> Sediment Deposits (B2)				<input type="checkbox"/> Oxidized Rhizospheres along Living Roots (C3)	<input type="checkbox"/> Geomorphic Position (D2)
<input type="checkbox"/> Drift Deposits (B3)				<input type="checkbox"/> Presence of Reduced Iron (C4)	<input type="checkbox"/> Shallow Aquitard (D3)
<input type="checkbox"/> Algal Mat or Crust (B4)				<input type="checkbox"/> Recent Iron Reduction in Tilled Soils (C6)	<input type="checkbox"/> FAC-Neutral Test (D5)
<input type="checkbox"/> Iron Deposits (B5)				<input type="checkbox"/> Stunted or Stressed Plants (D1) (LRR A)	<input type="checkbox"/> Raised Ant Mounds (D6) (LRR A)
<input checked="" type="checkbox"/> Surface Soil Cracks (B6)				<input type="checkbox"/> Other (Explain in Remarks)	<input type="checkbox"/> Frost-Heave Hummocks (D7)
<input type="checkbox"/> Inundation Visible on Aerial Imagery (B7)					
<input type="checkbox"/> Sparsely Vegetated Concave Surface (B8)					
Field Observations: Surface Water Present? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Depth (inches): _____ Water Table Present? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Depth (inches): _____ Saturation Present? (includes capillary fringe) Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Depth (inches): _____				Wetland Hydrology Present? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
Describe Recorded Data (stream gauge, monitoring well, aerial photos, previous inspections), if available:					
Remarks:					

WETLAND DETERMINATION DATA FORM – Western Mountains, Valleys, and Coast Region

Project/Site: NorCal Surf Shop City/County: Pacifica, SMC Sampling Date: 10/21/2019
 Applicant/Owner: Shawn Rhodes State: CA Sampling Point: A3
 Investigator(s): Patrick Kobernus Section, Township, Range: _____
 Landform (hillslope, terrace, etc.): Channel bank Local relief (concave, convex, none): Convex Slope (%): 100
 Subregion (LRR): California Lat: 37.594600 Long: -122.507276 Datum: NAD83
 Soil Map Unit Name: Urban NWI classification: None
 Are climatic / hydrologic conditions on the site typical for this time of year? Yes ☒ No ☐ (If no, explain in Remarks.)
 Are Vegetation ☐, Soil ☐, or Hydrology ☐ significantly disturbed? Are "Normal Circumstances" present? Yes ☒ No ☐
 Are Vegetation ☐, Soil ☐, or Hydrology ☐ naturally problematic? (If needed, explain any answers in Remarks.)

SUMMARY OF FINDINGS – Attach site map showing sampling point locations, transects, important features, etc.

Hydrophytic Vegetation Present?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	Is the Sampled Area within a Wetland? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Hydric Soil Present?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	
Wetland Hydrology Present?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	

Remarks:

Delineation is being done at request of CA Coastal Commission and potential wetland area is adjacent to, but not on, applicant's property.

VEGETATION – Use scientific names of plants.

Tree Stratum	(Plot size: <u>10 m r</u>)	Absolute % Cover	Dominant Species?	Indicator Status	Dominance Test worksheet: Number of Dominant Species That Are OBL, FACW, or FAC: <u>0</u> (A) Total Number of Dominant Species Across All Strata: <u>2</u> (B) Percent of Dominant Species That Are OBL, FACW, or FAC: <u>0</u> (A/B)
1. <u>Eucalyptus globulus</u>		60	Y	-NS-	
2. _____					
3. _____					
4. _____					
		60	= Total Cover		Prevalence Index worksheet: Total % Cover of: _____ Multiply by: OBL species <input type="checkbox"/> x 1 = _____ FACW species <input type="checkbox"/> x 2 = _____ FAC species <input type="checkbox"/> x 3 = _____ FACU species <input type="checkbox"/> x 4 = _____ UPL species <input type="checkbox"/> x 5 = _____ Column Totals: <u>0</u> (A) <u>2</u> (B) Prevalence Index = B/A = _____
Sapling/Shrub Stratum (Plot size: <u>10 m r</u>)					
1. _____					
2. _____					
3. _____					
Herb Stratum (Plot size: <u>2m r</u>)					Hydrophytic Vegetation Indicators: <input type="checkbox"/> 1 - Rapid Test for Hydrophytic Vegetation <input type="checkbox"/> 2 - Dominance Test is >50% <input type="checkbox"/> 3 - Prevalence Index is ≤3.0 ¹ <input type="checkbox"/> 4 - Morphological Adaptations ¹ (Provide supporting data in Remarks or on a separate sheet) <input type="checkbox"/> 5 - Wetland Non-Vascular Plants ¹ <input type="checkbox"/> Problematic Hydrophytic Vegetation ¹ (Explain) ¹ Indicators of hydric soil and wetland hydrology must be present, unless disturbed or problematic.
1. <u>Tropaeolum majus</u>		65	Y	UPL	
2. <u>Conium maculatum</u>		5	N	FAC	
3. <u>Zantedeschia aethiopica</u>		5	N	-NS-	
4. <u>Solanum nigrum</u>		15	N	FACU	
5. _____					
6. _____					
7. _____					
8. _____					
9. _____					
10. _____					
11. _____					
		90	= Total Cover		
Woody Vine Stratum (Plot size: <u>2m r</u>)					
1. <u>Rubus ursinus</u>		10	N	FACU	
2. _____					
		10	= Total Cover		
% Bare Ground in Herb Stratum _____					

Remarks:

2-19-0026

Exhibit 5

SOIL

Sampling Point: A3

Profile Description: (Describe to the depth needed to document the indicator or confirm the absence of indicators.)								
Depth (inches)	Matrix		Redox Features				Texture	Remarks
	Color (moist)	%	Color (moist)	%	Type ¹	Loc ²		
0-16	5YR 3/3	100					Sandy loam	

¹Type: C=Concentration, D=Depletion, RM=Reduced Matrix, CS=Covered or Coated Sand Grains. ²Location: PL=Pore Lining, M=Matrix.

Hydric Soil Indicators: (Applicable to all LRRs, unless otherwise noted.)		Indicators for Problematic Hydric Soils ³ :
<input type="checkbox"/> Histosol (A1)	<input type="checkbox"/> Sandy Redox (S5)	<input type="checkbox"/> 2 cm Muck (A10)
<input type="checkbox"/> Histic Epipedon (A2)	<input type="checkbox"/> Stripped Matrix (S6)	<input type="checkbox"/> Red Parent Material (TF2)
<input type="checkbox"/> Black Histic (A3)	<input type="checkbox"/> Loamy Mucky Mineral (F1) (except MLRA 1)	<input type="checkbox"/> Very Shallow Dark Surface (TF12)
<input type="checkbox"/> Hydrogen Sulfide (A4)	<input type="checkbox"/> Loamy Gleyed Matrix (F2)	<input type="checkbox"/> Other (Explain in Remarks)
<input type="checkbox"/> Depleted Below Dark Surface (A11)	<input type="checkbox"/> Depleted Matrix (F3)	
<input type="checkbox"/> Thick Dark Surface (A12)	<input type="checkbox"/> Redox Dark Surface (F6)	
<input type="checkbox"/> Sandy Mucky Mineral (S1)	<input type="checkbox"/> Depleted Dark Surface (F7)	
<input type="checkbox"/> Sandy Gleyed Matrix (S4)	<input type="checkbox"/> Redox Depressions (F8)	

³Indicators of hydrophytic vegetation and wetland hydrology must be present, unless disturbed or problematic

Restrictive Layer (if present): Type: _____ Depth (inches): _____	Hydric Soil Present? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
--	---

Remarks:
Uniform color to soil, combined with urban fill (concrete, brick, and other refuse)

HYDROLOGY

Wetland Hydrology Indicators:				Secondary Indicators (2 or more required)	
Primary Indicators (minimum of one required; check all that apply)					
<input type="checkbox"/> Surface Water (A1)	<input type="checkbox"/> Water-Stained Leaves (B9) (except MLRA 1, 2, 4A, and 4B)	<input type="checkbox"/> Water-Stained Leaves (B9) (MLRA 1, 2, 4A, and 4B)			
<input type="checkbox"/> High Water Table (A2)	<input type="checkbox"/> Salt Crust (B11)	<input type="checkbox"/> Drainage Patterns (B10)			
<input type="checkbox"/> Saturation (A3)	<input type="checkbox"/> Aquatic Invertebrates (B13)	<input type="checkbox"/> Dry-Season Water Table (C2)			
<input type="checkbox"/> Water Marks (B1)	<input type="checkbox"/> Hydrogen Sulfide Odor (C1)	<input type="checkbox"/> Saturation Visible on Aerial Imagery (C9)			
<input type="checkbox"/> Sediment Deposits (B2)	<input type="checkbox"/> Oxidized Rhizospheres along Living Roots (C3)	<input type="checkbox"/> Geomorphic Position (D2)			
<input type="checkbox"/> Drift Deposits (B3)	<input type="checkbox"/> Presence of Reduced Iron (C4)	<input type="checkbox"/> Shallow Aquitard (D3)			
<input type="checkbox"/> Algal Mat or Crust (B4)	<input type="checkbox"/> Recent Iron Reduction in Tilled Soils (C6)	<input type="checkbox"/> FAC-Neutral Test (D5)			
<input type="checkbox"/> Iron Deposits (B5)	<input type="checkbox"/> Stunted or Stressed Plants (D1) (LRR A)	<input type="checkbox"/> Raised Ant Mounds (D6) (LRR A)			
<input type="checkbox"/> Surface Soil Cracks (B6)	<input type="checkbox"/> Other (Explain in Remarks)	<input type="checkbox"/> Frost-Heave Hummocks (D7)			
<input type="checkbox"/> Inundation Visible on Aerial Imagery (B7)					
<input type="checkbox"/> Sparsely Vegetated Concave Surface (B8)					

Field Observations: Surface Water Present? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Depth (inches): _____ Water Table Present? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Depth (inches): _____ Saturation Present? (includes capillary fringe) Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Depth (inches): _____				Wetland Hydrology Present? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
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Describe Recorded Data (stream gauge, monitoring well, aerial photos, previous inspections), if available:

Remarks:
No wetland hydrology indicators present

2-19-0026

Exhibit 5

WETLAND DETERMINATION DATA FORM – Western Mountains, Valleys, and Coast Region

Project/Site: NorCal Surf Shop City/County: Pacifica, SMC Sampling Date: 10/21/2019
 Applicant/Owner: Shawn Rhodes State: CA Sampling Point: A4
 Investigator(s): Patrick Kobernus Section, Township, Range: _____
 Landform (hillslope, terrace, etc.): Channel bed Local relief (concave, convex, none): Concave Slope (%): 0
 Subregion (LRR): California Lat: 37.594600 Long: -122.507276 Datum: NAD83
 Soil Map Unit Name: Urban NWI classification: None

Are climatic / hydrologic conditions on the site typical for this time of year? Yes ☒ No ☐ (If no, explain in Remarks.)
 Are Vegetation ☐, Soil ☐, or Hydrology ☐ significantly disturbed? Are "Normal Circumstances" present? Yes ☒ No ☐
 Are Vegetation ☐, Soil ☐, or Hydrology ☐ naturally problematic? (If needed, explain any answers in Remarks.)

SUMMARY OF FINDINGS – Attach site map showing sampling point locations, transects, important features, etc.

Hydrophytic Vegetation Present?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	Is the Sampled Area within a Wetland?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Hydric Soil Present?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>			
Wetland Hydrology Present?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>			

Remarks:

Delineation is being done at request of CA Coastal Commission and potential wetland area is adjacent to, but not on, applicant's property.

VEGETATION – Use scientific names of plants.

Tree Stratum	(Plot size: <input type="text"/>)	Absolute % Cover	Dominant Species?	Indicator Status	Dominance Test worksheet: Number of Dominant Species That Are OBL, FACW, or FAC: <input type="text"/> 1 (A) Total Number of Dominant Species Across All Strata: <input type="text"/> 1 (B) Percent of Dominant Species That Are OBL, FACW, or FAC: <input type="text"/> 100 (A/B)
1.					
2.					
3.					
4.					
		= Total Cover			Prevalence Index worksheet: Total % Cover of: <input type="text"/> Multiply by: OBL species <input type="text"/> x 1 = <input type="text"/> FACW species <input type="text"/> x 2 = <input type="text"/> FAC species <input type="text"/> x 3 = <input type="text"/> FACU species <input type="text"/> x 4 = <input type="text"/> UPL species <input type="text"/> x 5 = <input type="text"/> Column Totals: <input type="text"/> (A) <input type="text"/> (B) Prevalence Index = B/A = <input type="text"/>
Sapling/Shrub Stratum	(Plot size: <input type="text"/>)				
1.					
2.					
3.					
4.					
5.					
		= Total Cover			
Herb Stratum	(Plot size: <input type="text"/> 2m r)				Hydrophytic Vegetation Indicators: <input type="checkbox"/> 1 - Rapid Test for Hydrophytic Vegetation <input checked="" type="checkbox"/> 2 - Dominance Test is >50% <input type="checkbox"/> 3 - Prevalence Index is ≤3.0 ¹ <input type="checkbox"/> 4 - Morphological Adaptations ¹ (Provide supporting data in Remarks or on a separate sheet) <input type="checkbox"/> 5 - Wetland Non-Vascular Plants ¹ <input type="checkbox"/> Problematic Hydrophytic Vegetation ¹ (Explain) ¹ Indicators of hydric soil and wetland hydrology must be present, unless disturbed or problematic.
1.	<u>Persicaria amphibia</u>	<u>40</u>	<u>Y</u>	<u>OBL</u>	
2.	<u>Plantago major</u>	<u>5</u>	<u>N</u>	<u>FAC</u>	
3.	<u>Sonchus asper</u>	<u>5</u>	<u>N</u>	<u>FACU</u>	
4.	<u>Raphanus sativus</u>	<u>5</u>	<u>N</u>	<u>-NS-</u>	
5.					
6.					
7.					
8.					
9.					
10.					
11.					
		<u>55</u>	= Total Cover		
Woody Vine Stratum	(Plot size: <input type="text"/>)				
1.					
2.					
		= Total Cover			
% Bare Ground in Herb Stratum		<input type="text"/>			

Remarks:

2-19-0026

Exhibit 5

SOIL

Sampling Point: A4

Profile Description: (Describe to the depth needed to document the indicator or confirm the absence of indicators.)								
Depth (inches)	Matrix		Redox Features				Texture	Remarks
	Color (moist)	%	Color (moist)	%	Type ¹	Loc ²		
0-16	10YR 3/1	100					Sandy loam	

¹Type: C=Concentration, D=Depletion, RM=Reduced Matrix, CS=Covered or Coated Sand Grains. ²Location: PL=Pore Lining, M=Matrix.

Hydric Soil Indicators: (Applicable to all LRRs, unless otherwise noted.)		Indicators for Problematic Hydric Soils ³ :
<input type="checkbox"/> Histosol (A1)	<input type="checkbox"/> Sandy Redox (S5)	<input type="checkbox"/> 2 cm Muck (A10)
<input type="checkbox"/> Histic Epipedon (A2)	<input type="checkbox"/> Stripped Matrix (S6)	<input type="checkbox"/> Red Parent Material (TF2)
<input type="checkbox"/> Black Histic (A3)	<input type="checkbox"/> Loamy Mucky Mineral (F1) (except MLRA 1)	<input type="checkbox"/> Very Shallow Dark Surface (TF12)
<input type="checkbox"/> Hydrogen Sulfide (A4)	<input type="checkbox"/> Loamy Gleyed Matrix (F2)	<input type="checkbox"/> Other (Explain in Remarks)
<input type="checkbox"/> Depleted Below Dark Surface (A11)	<input type="checkbox"/> Depleted Matrix (F3)	
<input type="checkbox"/> Thick Dark Surface (A12)	<input checked="" type="checkbox"/> Redox Dark Surface (F6)	
<input type="checkbox"/> Sandy Mucky Mineral (S1)	<input type="checkbox"/> Depleted Dark Surface (F7)	
<input type="checkbox"/> Sandy Gleyed Matrix (S4)	<input type="checkbox"/> Redox Depressions (F8)	

³Indicators of hydrophytic vegetation and wetland hydrology must be present, unless disturbed or problematic

Restrictive Layer (if present): Type: _____ Depth (inches): _____	Hydric Soil Present? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
--	---

Remarks:
Uniform color to soil, combined with urban fill (concrete, brick, and other refuse)

HYDROLOGY

Wetland Hydrology Indicators:		Secondary Indicators (2 or more required)
Primary Indicators (minimum of one required; check all that apply)		
<input type="checkbox"/> Surface Water (A1)	<input type="checkbox"/> Water-Stained Leaves (B9) (except MLRA 1, 2, 4A, and 4B)	<input type="checkbox"/> Water-Stained Leaves (B9) (MLRA 1, 2, 4A, and 4B)
<input type="checkbox"/> High Water Table (A2)	<input type="checkbox"/> Salt Crust (B11)	<input type="checkbox"/> Drainage Patterns (B10)
<input type="checkbox"/> Saturation (A3)	<input type="checkbox"/> Aquatic Invertebrates (B13)	<input type="checkbox"/> Dry-Season Water Table (C2)
<input type="checkbox"/> Water Marks (B1)	<input type="checkbox"/> Hydrogen Sulfide Odor (C1)	<input type="checkbox"/> Saturation Visible on Aerial Imagery (C9)
<input type="checkbox"/> Sediment Deposits (B2)	<input type="checkbox"/> Oxidized Rhizospheres along Living Roots (C3)	<input type="checkbox"/> Geomorphic Position (D2)
<input type="checkbox"/> Drift Deposits (B3)	<input type="checkbox"/> Presence of Reduced Iron (C4)	<input type="checkbox"/> Shallow Aquitard (D3)
<input type="checkbox"/> Algal Mat or Crust (B4)	<input type="checkbox"/> Recent Iron Reduction in Tilled Soils (C6)	<input type="checkbox"/> FAC-Neutral Test (D5)
<input type="checkbox"/> Iron Deposits (B5)	<input type="checkbox"/> Stunted or Stressed Plants (D1) (LRR A)	<input type="checkbox"/> Raised Ant Mounds (D6) (LRR A)
<input checked="" type="checkbox"/> Surface Soil Cracks (B6)	<input type="checkbox"/> Other (Explain in Remarks)	<input type="checkbox"/> Frost-Heave Hummocks (D7)
<input type="checkbox"/> Inundation Visible on Aerial Imagery (B7)		
<input type="checkbox"/> Sparsely Vegetated Concave Surface (B8)		

Field Observations: Surface Water Present? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Depth (inches): _____ Water Table Present? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Depth (inches): _____ Saturation Present? (includes capillary fringe) Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Depth (inches): _____	Wetland Hydrology Present? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
--	---

Describe Recorded Data (stream gauge, monitoring well, aerial photos, previous inspections), if available:

Remarks:
Electrical cable under channel, bricks, concrete rubble in soil.

2-19-0026

Exhibit 5

APPENDIX B

Representative Photographs



Figure 1. Drainage channel, with Eucalyptus trees. Photo date: 09/18/2019.



Figure 2. Drainage channel with brambles, north end. Photo date: 09/18/2019.



Figure 3. Drainage channel and bank with Eucalyptus, Rumex, Kikuyu grass and Tropaeolum plants. Photo date: 09/18/2019.



Figure 4. Drainage channel with blackberry and grass vegetation. Photo date: 09/18/2019.



Figure 5. Top of berm, (505 San Pedro Ave. property) looking north. Photo date: 09/18/2019.



Figure 6. Top of berm, (505 San Pedro Ave. property) looking south. Photo date: 09/18/2019.



Figure 7. Wetted channel on south end. Photo date: 09/18/2019.



Figure 8. Drainage channel (data point A4 and sewer line manhole). Photo date: 10/21/2019.



Figure 9. Channel bottom near data point A2 showing mud cracks. Photo date: 10/21/2019.



Figure 10. Channel bottom. Data point A2. Photo date: 10/21/2109.

Honey, Julian@Coastal

From: alfquilts@everyactioncustom.com on behalf of Austa Falconer
<alfquilts@everyactioncustom.com>
Sent: Thursday, May 1, 2025 12:02 PM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP
Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

I urge you to:

- Reject Pacifica's SSRA policy as currently drafted;
- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
- Require meaningful, site-based mitigation for any shoreline protection proposal;
- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,

Austa Falconer

1178 Lassen Ave Milpitas, CA 95035-6407 alfquilts@sbcglobal.net

Honey, Julian@Coastal

From: cherylherms@everyactioncustom.com on behalf of Cheryl Herms
<cherylherms@everyactioncustom.com>
Sent: Thursday, May 1, 2025 11:59 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

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Sincerely,

Cheryl Herms

531 Hawthorne Ct Los Altos, CA 94024-3121 cherylherms@yahoo.com

Honey, Julian@Coastal

From: gregvirgallito@everyactioncustom.com on behalf of Lucca Virgallito
<gregvirgallito@everyactioncustom.com>
Sent: Thursday, May 1, 2025 11:59 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

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Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,

Lucca Virgallito

414 Washington Blvd Half Moon Bay, CA 94019-1332 gregvirgallito@gmail.com

Honey, Julian@Coastal

From: elizabeth@everyactioncustom.com on behalf of Elizabeth Guimarin
<elizabeth@everyactioncustom.com>
Sent: Thursday, May 1, 2025 11:58 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP
Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

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Sincerely,
Elizabeth Guimarin
2088 Orestes Way Campbell, CA 95008-2612 elizabeth@guimarin.net

Honey, Julian@Coastal

From: environmom95112@everyactioncustom.com on behalf of Laurie Alaimo
<environmom95112@everyactioncustom.com>
Sent: Thursday, May 1, 2025 11:55 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP
Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

I urge you to:

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Sincerely,

Laurie Alaimo

1350 Oakland Rd Spc 198 San Jose, CA 95112-1348 environmom95112@yahoo.com

Honey, Julian@Coastal

From: derynest@everyactioncustom.com on behalf of Deryn Harris
<derynest@everyactioncustom.com>
Sent: Thursday, May 1, 2025 11:52 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

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Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,

Deryn Harris

722 Orchid Ave Capitola, CA 95010-3719

derynest@gmail.com

Honey, Julian@Coastal

From: nutrimel@everyactioncustom.com on behalf of Melinda MacNaughton
<nutrimel@everyactioncustom.com>
Sent: Thursday, May 1, 2025 11:51 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

No Seawalls. I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

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Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,
Melinda MacNaughton
PO Box 363 El Granada, CA 94018-0363
nutrimel@comcast.net

Honey, Julian@Coastal

From: sarah@everyactioncustom.com on behalf of Sarah Adams
<sarah@everyactioncustom.com>
Sent: Thursday, May 1, 2025 11:50 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

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Sincerely,

Sarah Adams

1187 Laurie Ave San Jose, CA 95125-3442 sarah@voraciousreader.com

Honey, Julian@Coastal

From: vkojola@everyactioncustom.com on behalf of Victoia Kojola
<vkojola@everyactioncustom.com>
Sent: Thursday, May 1, 2025 11:44 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

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Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,

Victoia Kojola

23500 Cristo Rey Dr Unit 522F Cupertino, CA 95014-6537 vkojola@comcast.net

Honey, Julian@Coastal

From: mwilsaf@everyactioncustom.com on behalf of Marguerite Wilhelm-Safian
<mwilsaf@everyactioncustom.com>
Sent: Thursday, May 1, 2025 11:39 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

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Sincerely,
Marguerite Wilhelm-Safian
390 Martha St San Jose, CA 95112-3918
mwilsaf@gmail.com

Honey, Julian@Coastal

From: kumasong@everyactioncustom.com on behalf of Karen Kirschling
<kumasong@everyactioncustom.com>
Sent: Thursday, May 1, 2025 11:34 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

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Sincerely,

Karen Kirschling

633 Oak St San Francisco, CA 94117-2655 kumasong@icloud.com

Honey, Julian@Coastal

From: jackelynatham@everyactioncustom.com on behalf of Jackie Latham
<jackelynatham@everyactioncustom.com>
Sent: Thursday, May 1, 2025 11:31 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP
Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

Hi there,

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Sincerely,

Jackie Latham

11100 La Honda Rd Redwood City, CA 94062-3770 jackelynatham@gmail.com

Honey, Julian@Coastal

From: elisamarina.alvarado@everyactioncustom.com on behalf of Elisa Marina Alvarado
<elisamarina.alvarado@everyactioncustom.com>
Sent: Thursday, May 1, 2025 11:30 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP
Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

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Sincerely,

Elisa Marina Alvarado

223 S Sunset Ave San Jose, CA 95116-3053 elisamarina.alvarado@gmail.com

Honey, Julian@Coastal

From: m.giglio@everyactioncustom.com on behalf of Mary Anne Giglio
<m.giglio@everyactioncustom.com>
Sent: Thursday, May 1, 2025 11:28 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

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Sincerely,

Mary Anne Giglio

300 Coronado St El Granada, CA 94018-8051 m.giglio@comcast.net

Honey, Julian@Coastal

From: kumasong@everyactioncustom.com on behalf of Karen Kirschling
<kumasong@everyactioncustom.com>
Sent: Thursday, May 1, 2025 11:26 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP
Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

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Sincerely,

Karen Kirschling

633 Oak St San Francisco, CA 94117-2655 kumasong@icloud.com

Honey, Julian@Coastal

From: danielle.hassid@everyactioncustom.com on behalf of Danielle Hassid
<danielle.hassid@everyactioncustom.com>
Sent: Thursday, May 1, 2025 11:22 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP
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Sincerely,

Danielle Hassid

1090 Parrott Dr Hillsborough, CA 94010-7468 danielle.hassid@gmail.com

Honey, Julian@Coastal

From: judith.butts@everyactioncustom.com on behalf of Judith Butts
<judith.butts@everyactioncustom.com>
Sent: Thursday, May 1, 2025 11:21 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

I urge you to:

- Reject Pacifica's SSRA policy as currently drafted;
- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
- Require meaningful, site-based mitigation for any shoreline protection proposal;
- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,

Judith Butts

1036 Sladky Ave Mountain View, CA 94040-3653 judith.butts@gmail.com

Honey, Julian@Coastal

From: bluetoothfairy18@everyactioncustom.com on behalf of Sharon Paltin <bluetoothfairy18@everyactioncustom.com>
Sent: Thursday, May 1, 2025 11:18 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

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Sincerely,
Sharon Paltin
PO Box 18 Laytonville, CA 95454-0018
bluetoothfairy18@gmail.com

Honey, Julian@Coastal

From: parkladydi1@everyactioncustom.com on behalf of D. Palacio <parkladydi1@everyactioncustom.com>
Sent: Thursday, May 1, 2025 11:17 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

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Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Our coasts are under constant threat especially from politicians and developers who only think of monetary gain. We, the people, love our coasts and beaches and deserve to be able to enjoy them. Please reject Pacifica's SSRA policy which will open the door for attacks on our coastal and beach areas.

Sincerely,

D. Palacio

44 Ellington Ave San Francisco, CA 94112-3621 parkladydi1@sbcglobal.net

Honey, Julian@Coastal

From: sgross650@everyactioncustom.com on behalf of Susan Gross <sgross650@everyactioncustom.com>
Sent: Thursday, May 1, 2025 11:00 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

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Sincerely,

Susan Gross

69 Coronado Ave San Carlos, CA 94070-2902 sgross650@gmail.com

Honey, Julian@Coastal

From: nannystu@everyactioncustom.com on behalf of Nancy Sidebotham
<nannystu@everyactioncustom.com>
Sent: Thursday, May 1, 2025 10:57 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

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Sincerely,

Nancy Sidebotham

6375 Hillmont Dr Oakland, CA 94605-2240 nannystu@sonic.net

Honey, Julian@Coastal

From: mushrunk@everyactioncustom.com on behalf of Karen Stephenson
<mushrunk@everyactioncustom.com>
Sent: Thursday, May 1, 2025 10:54 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP
Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

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Sincerely,
Karen Stephenson
2464 Tulip Rd San Jose, CA 95128-1144
mushrunk@sbcglobal.net

Honey, Julian@Coastal

From: maureenmlane@everyactioncustom.com on behalf of Maureen Lane
<maureenmlane@everyactioncustom.com>
Sent: Thursday, May 1, 2025 10:53 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

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Sincerely,
Maureen Lane

Sincerely,
Maureen Lane
1018 Loma Prieta Ct Los Altos, CA 94024-5024 maureenmlane@gmail.com

Honey, Julian@Coastal

From: njgaliher@everyactioncustom.com on behalf of Norma Jean Bodey Galiher
<njgaliher@everyactioncustom.com>
Sent: Thursday, May 1, 2025 10:51 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP
Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

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Sincerely,

Norma Jean Bodey Galiher

434 Carmelita Dr Mountain View, CA 94040-3259 njgaliher@earthlink.net

Honey, Julian@Coastal

From: maureenmlane@everyactioncustom.com on behalf of Maureen Lane
<maureenmlane@everyactioncustom.com>
Sent: Thursday, May 1, 2025 10:44 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

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Sincerely,
Maureen Lane

Sincerely,
Maureen Lane
1018 Loma Prieta Ct Los Altos, CA 94024-5024 maureenmlane@gmail.com

Honey, Julian@Coastal

From: ebacon07@everyactioncustom.com on behalf of Elizabeth Bacon <ebacon07@everyactioncustom.com>
Sent: Thursday, May 1, 2025 10:43 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

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Sincerely,

Elizabeth Bacon

451 Acorn Dr Boulder Creek, CA 95006-9329 ebacon07@ucsbalum.com

Honey, Julian@Coastal

From: kalaentaxi@everyactioncustom.com on behalf of Teri Yazdi
<kalaentaxi@everyactioncustom.com>
Sent: Thursday, May 1, 2025 10:43 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP
Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

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Sincerely,

Teri Yazdi

51 Winding Way San Carlos, CA 94070-2812 kalaentaxi@earthlink.net

Honey, Julian@Coastal

From: mtedesco@everyactioncustom.com on behalf of Martha Tedesco
<mtedesco@everyactioncustom.com>
Sent: Thursday, May 1, 2025 10:42 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

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Sincerely,

Martha Tedesco

350 La Mesa Dr Portola Valley, CA 94028-7514 mtedesco@openspacetrust.org

Honey, Julian@Coastal

From: megg_m3@everyactioncustom.com on behalf of Mario Guzman <megg_m3@everyactioncustom.com>
Sent: Thursday, May 1, 2025 10:34 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

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Sincerely,
Mario Guzman
1022 N 2nd St San Jose, CA 95112-4930
megg_m3@yahoo.com

Honey, Julian@Coastal

From: plopez7829@everyactioncustom.com on behalf of Pedro Lopez <plopez7829@everyactioncustom.com>
Sent: Thursday, May 1, 2025 10:34 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

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Sincerely,
Pedro Lopez
630 Verdun Ct Hollister, CA 95023-6837
plopez7829@icloud.com

Honey, Julian@Coastal

From: marybobcat@everyactioncustom.com on behalf of Mary Bernstein
<marybobcat@everyactioncustom.com>
Sent: Thursday, May 1, 2025 10:32 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

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Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

If you open the door to seawalls in Pacifica, how will you be able to refuse other cities that want seawalls?

Sincerely,
Mary Bernstein
1212 Byron St Palo Alto, CA 94301-3212
marybobcat@yahoo.com

Honey, Julian@Coastal

From: jennesin911@everyactioncustom.com on behalf of Jenne Sindoni <jennesin911@everyactioncustom.com>
Sent: Thursday, May 1, 2025 10:29 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

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Sincerely,

Jenne Sindoni

113 Faraday St Boston, MA 02136-3307

jennesin911@hotmail.com

Honey, Julian@Coastal

From: tillyg@everyactioncustom.com on behalf of Chantilly Gaudy
<tillyg@everyactioncustom.com>
Sent: Thursday, May 1, 2025 10:29 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

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Sincerely,
Chantilly Gaudy
7216 Via Vis San Jose, CA 95139-1163
tillyg@gmail.com

Honey, Julian@Coastal

From: bluetoothfairy18@everyactioncustom.com on behalf of Sharon Paltin <bluetoothfairy18@everyactioncustom.com>
Sent: Thursday, May 1, 2025 10:27 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

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Sincerely,
Sharon Paltin
PO Box 18 Laytonville, CA 95454-0018
bluetoothfairy18@gmail.com

Honey, Julian@Coastal

From: nancyafeder2018@everyactioncustom.com on behalf of Nancy Federspiel
<nancyafeder2018@everyactioncustom.com>
Sent: Thursday, May 1, 2025 10:21 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP
Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

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Sincerely,

Nancy Federspiel

1345 Altschul Ave Menlo Park, CA 94025-6605 nancyafeder2018@gmail.com

Honey, Julian@Coastal

From: karenzamel@everyactioncustom.com on behalf of Karen Zamel
<karenzamel@everyactioncustom.com>
Sent: Thursday, May 1, 2025 10:17 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

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Sincerely,

Karen Zamel

2690 Goodwin Ave Redwood City, CA 94061-2520 karenzamel@gmail.com

Honey, Julian@Coastal

From: bc899899@everyactioncustom.com on behalf of Brian Carr <bc899899@everyactioncustom.com>
Sent: Thursday, May 1, 2025 10:17 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

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Sincerely,

Brian Carr

5482 Blossom Tree Ln San Jose, CA 95124-6033 bc899899@comcast.net

Honey, Julian@Coastal

From: luci.evanston@everyactioncustom.com on behalf of Luci Evanston
<luci.evanston@everyactioncustom.com>
Sent: Thursday, May 1, 2025 10:17 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

Please, no seawalls! I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

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Sincerely,

Luci Evanston

752 Glenview Dr Apt 209 San Bruno, CA 94066-3706 luci.evanston@salusengineering.com

Honey, Julian@Coastal

From: karenzamel@everyactioncustom.com on behalf of Jeff C. Dye
<karenzamel@everyactioncustom.com>
Sent: Thursday, May 1, 2025 10:16 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

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Sincerely,

Jeff C. Dye

2690 Goodwin Ave Redwood City, CA 94061-2520 karenzamel@gmail.com

Honey, Julian@Coastal

From: sean_miller831@everyactioncustom.com on behalf of Sean Miller <sean_miller831@everyactioncustom.com>
Sent: Thursday, May 1, 2025 10:13 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

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- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
- Require meaningful, site-based mitigation for any shoreline protection proposal;
- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,

Sean Miller

2421 Valley View Rd Hollister, CA 95023-8003 sean_miller831@yahoo.com

Honey, Julian@Coastal

From: greenpeach1@everyactioncustom.com on behalf of Megan Moran <greenpeach1@everyactioncustom.com>
Sent: Thursday, May 1, 2025 10:12 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

I urge you to:

- Reject Pacifica's SSRA policy as currently drafted;
- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
- Require meaningful, site-based mitigation for any shoreline protection proposal;
- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,
Megan Moran
1708 9th St Berkeley, CA 94710-1837
greenpeach1@gmail.com

Honey, Julian@Coastal

From: peckos@everyactioncustom.com on behalf of Jim Petkiewicz
<peckos@everyactioncustom.com>
Sent: Thursday, May 1, 2025 10:09 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

I urge you to:

- Reject Pacifica's SSRA policy as currently drafted;
- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
- Require meaningful, site-based mitigation for any shoreline protection proposal;
- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,
Jim Petkiewicz
916 Wren Dr San Jose, CA 95125-2952
peckos@me.com

Honey, Julian@Coastal

From: judithsmith313@everyactioncustom.com on behalf of Judith Smith <judithsmith313@everyactioncustom.com>
Sent: Thursday, May 1, 2025 10:09 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

I urge you to:

- Reject Pacifica's SSRA policy as currently drafted;
- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
- Require meaningful, site-based mitigation for any shoreline protection proposal;
- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,

Judith Smith

2712 Grande Vista Ave Oakland, CA 94601-1320 judithsmith313@gmail.com

Honey, Julian@Coastal

From: peckos@everyactioncustom.com on behalf of Margaret P
<peckos@everyactioncustom.com>
Sent: Thursday, May 1, 2025 10:05 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP
Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

I urge you to:

- Reject Pacifica's SSRA policy as currently drafted;
- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
- Require meaningful, site-based mitigation for any shoreline protection proposal;
- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,
Margaret P
916 Wren Dr San Jose, CA 95125-2952
peckos@comcast.net

Honey, Julian@Coastal

From: kirsten.holmquist@everyactioncustom.com on behalf of Kirsten Holmquist
<kirsten.holmquist@everyactioncustom.com>
Sent: Thursday, May 1, 2025 10:03 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP
Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

I urge you to:

- Reject Pacifica's SSRA policy as currently drafted;
- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
- Require meaningful, site-based mitigation for any shoreline protection proposal;
- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,

Kirsten Holmquist

505 Porpoise Bay Ter Sunnyvale, CA 94089-4723 kirsten.holmquist@comcast.net

Honey, Julian@Coastal

From: sandy@everyactioncustom.com on behalf of Sandy Cold
<sandy@everyactioncustom.com>
Sent: Thursday, May 1, 2025 10:01 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

I urge you to:

- Reject Pacifica's SSRA policy as currently drafted;
- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
- Require meaningful, site-based mitigation for any shoreline protection proposal;
- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,
Sandy Cold
PO Box 620431 Woodside, CA 94062-0431
sandy@toofar.net

Honey, Julian@Coastal

From: jmbrazil@everyactioncustom.com on behalf of John Brazil
<jmbrazil@everyactioncustom.com>
Sent: Thursday, May 1, 2025 10:01 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

Please reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation would put our beaches at risk, relying on seawalls which actively contribute to beach loss.

I urge you to:

- Reject Pacifica's SSRA policy as currently drafted;
- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
- Require meaningful, site-based mitigation for any shoreline protection proposal;
- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Sincerely,

John Brazil

307 Loreto St Mountain View, CA 94041-2239 jmbrazil@sbcglobal.net

Honey, Julian@Coastal

From: dsilverla@everyactioncustom.com on behalf of Dan Silver
<dsilverla@everyactioncustom.com>
Sent: Thursday, May 1, 2025 9:57 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

I urge you to:

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- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
- Require meaningful, site-based mitigation for any shoreline protection proposal;
- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,

Dan Silver

222 S Figueroa St Apt 1611 Los Angeles, CA 90012-2584 dsilverla@me.com

Honey, Julian@Coastal

From: frenchwand@everyactioncustom.com on behalf of Wanda Waldera
<frenchwand@everyactioncustom.com>
Sent: Thursday, May 1, 2025 9:54 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

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- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
- Require meaningful, site-based mitigation for any shoreline protection proposal;
- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,

Wanda Waldera

736 N 17th St San Jose, CA 95112-3030

frenchwand@comcast.net

Honey, Julian@Coastal

From: shekhar@everyactioncustom.com on behalf of Shekhar Krishnan
<shekhar@everyactioncustom.com>
Sent: Thursday, May 1, 2025 9:54 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

Dear Sir/Madam

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

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- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
- Require meaningful, site-based mitigation for any shoreline protection proposal;
- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,

Shekhar Krishnan

2881 Norcrest Dr San Jose, CA 95148-2226 shekhar@acroama.com

Honey, Julian@Coastal

From: kfwalkerlandscape@everyactioncustom.com on behalf of Karen Walker
<kfwalkerlandscape@everyactioncustom.com>
Sent: Thursday, May 1, 2025 9:53 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP
Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

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- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
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Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,
Karen Walker
PO Box 206 Pescadero, CA 94060-0206
kfwalkerlandscape@gmail.com

Honey, Julian@Coastal

From: kylie.fletcher370@everyactioncustom.com on behalf of Kylie Fletcher <kylie.fletcher370@everyactioncustom.com>
Sent: Thursday, May 1, 2025 9:51 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

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- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
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- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,

Kylie Fletcher

5590 Clovercrest Dr Apt 2 San Jose, CA 95118-3013 kylie.fletcher370@gmail.com

Honey, Julian@Coastal

From: mjcnelson1@everyactioncustom.com on behalf of Marisa Nelson <mjcnelson1@everyactioncustom.com>
Sent: Thursday, May 1, 2025 9:49 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

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- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
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- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,
Marisa Nelson
1 Quail Ct Redwood City, CA 94062-4534
mjcnelson1@gmail.com

Honey, Julian@Coastal

From: melindaliza@everyactioncustom.com on behalf of Melinda Costa
<melindaliza@everyactioncustom.com>
Sent: Thursday, May 1, 2025 9:48 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP
Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

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Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,

Melinda Costa

367 Santana Hts San Jose, CA 95128-2073 melindaliza@gmail.com

Honey, Julian@Coastal

From: joaniemlewis@everyactioncustom.com on behalf of Joanie Lewis
<joaniemlewis@everyactioncustom.com>
Sent: Thursday, May 1, 2025 9:46 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

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- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
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- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,
Joanie Lewis
8130 Oak Ct Gilroy, CA 95020-4417
joaniemlewis@charter.net

Honey, Julian@Coastal

From: miaketterling@everyactioncustom.com on behalf of Mia Ketterling
<miaketterling@everyactioncustom.com>
Sent: Thursday, May 1, 2025 9:43 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

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- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
- Require meaningful, site-based mitigation for any shoreline protection proposal;
- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,
Mia Ketterling
68 Oviedo Ct Pacifica, CA 94044-3548
miaketterling@gmail.com

Honey, Julian@Coastal

From: monteserenoguy@everyactioncustom.com on behalf of James Crowley
<monteserenoguy@everyactioncustom.com>
Sent: Thursday, May 1, 2025 9:43 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

I urge you to:

- Reject Pacifica's SSRA policy as currently drafted;
- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
- Require meaningful, site-based mitigation for any shoreline protection proposal;
- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,

James Crowley

950 Huasna Rd Spc 55 Arroyo Grande, CA 93420-2847 monteserenoguy@aol.com

Honey, Julian@Coastal

From: shani@everyactioncustom.com on behalf of Shani Kleinhaus
<shani@everyactioncustom.com>
Sent: Thursday, May 1, 2025 9:41 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

I am a Bay Area resident who often travels to our magnificent coast to enjoy its natural beauty and culture. I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively increase erosion along the coast and contribute to beach loss.

I urge you to:

- Reject Pacifica's SSRA policy as currently drafted;
- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
- Require meaningful, site-based mitigation for any shoreline protection proposal;
- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Residents of California deserve a coastal plan that protects its beaches and waves – and the birds and mammals that rely on these beaches for their survival. Please stand up for the coast and future generations.

Sincerely,
Shani Kleinhaus
3870 Corina Way Palo Alto, CA 94303-4508 shani@scvas.org

Honey, Julian@Coastal

From: birdbrain@everyactioncustom.com on behalf of Kira Od
<birdbrain@everyactioncustom.com>
Sent: Thursday, May 1, 2025 9:40 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP
Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

Please reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts ALL of California's beaches at risk, and relies on seawalls which contribute to beach loss. I urge you to clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine, and to require meaningful, site-based mitigation for any shoreline protection proposal.

Please stand up for our coast and future generations.

Sincerely,

Kira Od

475 Central Ave Sunnyvale, CA 94086-6335 birdbrain@naughtyraven.com

Honey, Julian@Coastal

From: a_m_mason@everyactioncustom.com on behalf of Anne Mason
<a_m_mason@everyactioncustom.com>
Sent: Thursday, May 1, 2025 9:40 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP
Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

I urge you to:

- Reject Pacifica's SSRA policy as currently drafted;
- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
- Require meaningful, site-based mitigation for any shoreline protection proposal;
- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,

Anne Mason

4250 El Camino Real Apt B216 Palo Alto, CA 94306-4467 a_m_mason@ieee.org

Honey, Julian@Coastal

From: Ann@everyactioncustom.com on behalf of Ann Lopez <Ann@everyactioncustom.com>
Sent: Thursday, May 1, 2025 9:37 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

I urge you to:

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- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
- Require meaningful, site-based mitigation for any shoreline protection proposal;
- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,

Ann Lopez

5344 Taylor Way Felton, CA 95018-9267

Ann@Farmworkerfamily.org

Honey, Julian@Coastal

From: clouise@everyactioncustom.com on behalf of Christine Nagel
<clouise@everyactioncustom.com>
Sent: Thursday, May 1, 2025 9:35 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

I urge you to:

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- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
- Require meaningful, site-based mitigation for any shoreline protection proposal;
- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,
Christine Nagel
1263 Yosemite Ave San Jose, CA 95126-2670 clouise@cox.net

Honey, Julian@Coastal

From: annkircher@everyactioncustom.com on behalf of ann kircher
<annkircher@everyactioncustom.com>
Sent: Thursday, May 1, 2025 9:33 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP
Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

I am a marine biologist, native plant advocate and a coastal hiker. I live in San Francisco whereyygreat efforts have been made to protect our coastal ecosystems and beaches. The beaches in Pacifica are intimately connected by longshore currents to San Francisco's beaches and those to the south like half Moon Bay , Ano Nuevo and on and on. I urge the coastal commission to hold to its principles to protect coastal environments. These environments are going to become more and more stressed with sea level rise, and there are biological mitigations that can be done to work with these changes to protect the environment.

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

I urge you to:

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- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,
ann kircher

578 Moultrie St San Francisco, CA 94110-6032 annkircher@sbcglobal.net

Honey, Julian@Coastal

From: ed_plan@everyactioncustom.com on behalf of Debra Ullmann
<ed_plan@everyactioncustom.com>
Sent: Thursday, May 1, 2025 9:32 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

I urge you to:

- Reject Pacifica's SSRA policy as currently drafted;
- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
- Require meaningful, site-based mitigation for any shoreline protection proposal;
- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,

Debra Ullmann

18260 Serra Pl Morgan Hill, CA 95037-2982 ed_plan@sbcglobal.net

Honey, Julian@Coastal

From: chhaprahiya@everyactioncustom.com on behalf of Arvind Kumar
<chhaprahiya@everyactioncustom.com>
Sent: Thursday, May 1, 2025 9:32 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP
Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

I urge you to:

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- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
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- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,

Arvind Kumar

2927 Glen Craig Ct San Jose, CA 95148-2528 chhaprahiya@yahoo.com

Honey, Julian@Coastal

From: matt.burrows@everyactioncustom.com on behalf of Matthew Burrows
<matt.burrows@everyactioncustom.com>
Sent: Thursday, May 1, 2025 9:31 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP
Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

I urge you to:

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- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,

Matthew Burrows

15 Lighthouse Rd Half Moon Bay, CA 94019-2311 matt.burrows@hotmail.com

Honey, Julian@Coastal

From: nancy.barnby@everyactioncustom.com on behalf of nancy barnby
<nancy.barnby@everyactioncustom.com>
Sent: Thursday, May 1, 2025 9:29 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP
Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

The Pacific Ocean is a treasure that belongs to all Americans. Yes, some lucky people live near beaches all up and down the state. however it is patently unfair and detrimental to the environment, as well as to ciizens who "own" public beaches in California.

Pleas, please reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

I urge you to:

- Reject Pacifica's SSRA policy as currently drafted;
- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
- Require meaningful, site-based mitigation for any shoreline protection proposal;
- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and for all of us, today and in the future, who "own" the beaches of CA.

thank you, nancy barnby, menlo park

Sincerely,

nancy barnby

169 Spruce Ave Menlo Park, CA 94025-3039 nancy.barnby@gmail.com

Honey, Julian@Coastal

From: fricano.marian@everyactioncustom.com on behalf of Marian Fricano
<fricano.marian@everyactioncustom.com>
Sent: Thursday, May 1, 2025 9:26 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

I urge you to:

- Reject Pacifica's SSRA policy as currently drafted;
- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
- Require meaningful, site-based mitigation for any shoreline protection proposal;
- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,
Marian Fricano
4271 N 1st St San Jose, CA 95134-1256
fricano.marian@gmail.com

Honey, Julian@Coastal

From: ari@everyactioncustom.com on behalf of Ari Turrentine <ari@everyactioncustom.com>
Sent: Thursday, May 1, 2025 9:25 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

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I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

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- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,

Ari Turrentine

3575 Brookdale Ave Oakland, CA 94619-1013 ari@greenfoothills.org

Honey, Julian@Coastal

From: frogleap@everyactioncustom.com on behalf of Craig Britton
<frogleap@everyactioncustom.com>
Sent: Thursday, May 1, 2025 9:24 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

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- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,
Craig Britton

71 Pasa Robles Ave Los Altos, CA 94022-1236 frogleap@sonic.net

Honey, Julian@Coastal

From: Rlhorne@everyactioncustom.com on behalf of Rick Horne
<Rlhorne@everyactioncustom.com>
Sent: Thursday, May 1, 2025 9:22 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

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- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,
Rick Horne
778 Inwood Dr Campbell, CA 95008-4437
Rlhorne@sbcglobal.net

Honey, Julian@Coastal

From: nancy@everyactioncustom.com on behalf of Nancy Peterson
<nancy@everyactioncustom.com>
Sent: Thursday, May 1, 2025 9:22 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

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- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,

Nancy Peterson

229 Sherman Dr Scotts Valley, CA 95066-3627 nancy@baymoon.com

Honey, Julian@Coastal

From: tjatulip@everyactioncustom.com on behalf of Terry Awtrey
<tjatulip@everyactioncustom.com>
Sent: Thursday, May 1, 2025 9:21 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

I urge you to:

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- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
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- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,

Terry Awtrey

1322 Burkette Dr San Jose, CA 95129-4357 tjatulip@aol.com

Honey, Julian@Coastal

From: jpmock5@everyactioncustom.com on behalf of John Mockus <jpmock5@everyactioncustom.com>
Sent: Thursday, May 1, 2025 9:20 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

I urge you to:

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- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
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- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,
John Mockus
423 Monterey Rd Pacifica, CA 94044-1466 jpmock5@gmail.com

Honey, Julian@Coastal

From: bellasherman@everyactioncustom.com on behalf of Theresa Sherman
<bellasherman@everyactioncustom.com>
Sent: Thursday, May 1, 2025 9:20 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP
Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

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I urge you to:

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- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
- Require meaningful, site-based mitigation for any shoreline protection proposal;
- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,

Theresa Sherman

1398 Cherrywood Sq San Jose, CA 95117-3611 bellasherman@att.net

Honey, Julian@Coastal

From: sleclair215@everyactioncustom.com on behalf of Susan LeClair <sleclair215@everyactioncustom.com>
Sent: Thursday, May 1, 2025 9:19 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

I urge you to:

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- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
- Require meaningful, site-based mitigation for any shoreline protection proposal;
- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,

Susan LeClair

158 E Rincon Ave Campbell, CA 95008-2919 sleclair215@gmail.com

Honey, Julian@Coastal

From: jpmock5@everyactioncustom.com on behalf of John Mockus <jpmock5@everyactioncustom.com>
Sent: Thursday, May 1, 2025 9:19 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

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I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

I urge you to:

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- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
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- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,
John Mockus
423 Monterey Rd Pacifica, CA 94044-1466 jpmock5@gmail.com

Honey, Julian@Coastal

From: samsontu@everyactioncustom.com on behalf of Samson Tu
<samsontu@everyactioncustom.com>
Sent: Thursday, May 1, 2025 9:18 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

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- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
- Require meaningful, site-based mitigation for any shoreline protection proposal;
- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,
Samson Tu
976 Elsinore Ct Palo Alto, CA 94303-3410 samsontu@gmail.com

Honey, Julian@Coastal

From: allan@everyactioncustom.com on behalf of Allan Hogle
<allan@everyactioncustom.com>
Sent: Thursday, May 1, 2025 9:18 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

I am urgently asking you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." It is already known that this new designation puts our beaches at risk. .

I specifically ask you to:

- Reject Pacifica's SSRA policy as currently drafted;
- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
- Require meaningful, site-based mitigation for any shoreline protection proposal;
- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them.

And I as a coastal dweller on the north California coast absolutely do not want this to end up a precedent for our coastal area.

Please stand up for the coast and future generations.

Sincerely,
Allan Hogle
PO Box 711 Gualala, CA 95445-0711
allan@energyzones.com

Honey, Julian@Coastal

From: sallypbailey@everyactioncustom.com on behalf of Sally Bailey
<sallypbailey@everyactioncustom.com>
Sent: Thursday, May 1, 2025 9:18 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

I urge you to:

- Reject Pacifica's SSRA policy as currently drafted;
- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
- Require meaningful, site-based mitigation for any shoreline protection proposal;
- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,
Sally Bailey
4879 Elester Dr San Jose, CA 95124-4904 sallypbailey@gmail.com

Honey, Julian@Coastal

From: reafreedom23@everyactioncustom.com on behalf of Rea Freedom <reafreedom23@everyactioncustom.com>
Sent: Thursday, May 1, 2025 9:17 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

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Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,

Rea Freedom

19760 Oakmont Dr Los Gatos, CA 95033-8840 reafreedom23@gmail.com

Honey, Julian@Coastal

From: barbaraweinstein2@everyactioncustom.com on behalf of Barbara Weinstein
<barbaraweinstein2@everyactioncustom.com>
Sent: Thursday, May 1, 2025 9:17 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP
Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

I'm writing to oppose the City of Pacifica's current Land Use Local Coastal Plan draft.

I understand that the new "Special Shoreline Resiliency Areas" designation relies on seawalls, which have been demonstrated to contribute to beach losses.

Please:

- Reject the current draft of the Pacifica SSRA policy.
- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
- Require meaningful, site-based mitigation for any shoreline protection proposal;
- Prioritize nature-based solutions and adaptive realignment of infrastructure.

It's essential that the coastal plan for Pacifica protect beaches and waves and exclude construction of seawalls.

Thank you,

Barbara Weinstein

Sincerely,

Barbara Weinstein

1525 Siesta Dr Los Altos, CA 94024-6157 barbaraweinstein2@gmail.com

Honey, Julian@Coastal

From: bilgepump100@everyactioncustom.com on behalf of Robert Hall <bilgepump100@everyactioncustom.com>
Sent: Thursday, May 1, 2025 9:17 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

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Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,
Robert Hall

1946 Grove St Apt 6 San Francisco, CA 94117-1149 bilgepump100@sbcglobal.net

Honey, Julian@Coastal

From: Shirin.mullen@everyactioncustom.com on behalf of Shirin Mullen
<Shirin.mullen@everyactioncustom.com>
Sent: Thursday, May 1, 2025 9:14 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

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Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,

Shirin Mullen

104 Haight St Menlo Park, CA 94025-2549 Shirin.mullen@gmail.com

Honey, Julian@Coastal

From: eeredfern@everyactioncustom.com on behalf of Erin Redfern
<eeredfern@everyactioncustom.com>
Sent: Thursday, May 1, 2025 9:14 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

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Sincerely,
Erin Redfern
1415 Millich Ct San Jose, CA 95117-3629 eeredfern@gmail.com

Honey, Julian@Coastal

From: kona.dave@everyactioncustom.com on behalf of David Moore
<kona.dave@everyactioncustom.com>
Sent: Thursday, May 1, 2025 9:12 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP
Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

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Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,

David Moore

401 Poplar St Half Moon Bay, CA 94019-2029 kona.dave@yahoo.com

Honey, Julian@Coastal

From: annmonroegsb@everyactioncustom.com on behalf of Ann Monroe
<annmonroegsb@everyactioncustom.com>
Sent: Thursday, May 1, 2025 9:11 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP
Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

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- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
- Require meaningful, site-based mitigation for any shoreline protection proposal;
- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,
Ann Monroe
2011 Ellen Ave San Jose, CA 95125-2524
annmonroegsb@gmail.com

Honey, Julian@Coastal

From: scanman1948@everyactioncustom.com on behalf of Steven Smith <scanman1948@everyactioncustom.com>
Sent: Thursday, May 1, 2025 9:09 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

I urge you to:

- Reject Pacifica's SSRA policy as currently drafted;
- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
- Require meaningful, site-based mitigation for any shoreline protection proposal;
- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,

Steven Smith

528 Cloudview Dr Watsonville, CA 95076-3560 scanman1948@gmail.com

Honey, Julian@Coastal

From: jgoldstein@everyactioncustom.com on behalf of Jesse Goldstein
<jgoldstein@everyactioncustom.com>
Sent: Thursday, May 1, 2025 9:06 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

Use nature-based solutions, not hard seawalls! Restoring native coastal ecosystems is proven to be more effective, much cheaper, longer lasting, and delivers more benefits to more people than do seawalls.

I urge you to:

- Reject Pacifica's SSRA policy as currently drafted;
- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
- Require meaningful, site-based mitigation for any shoreline protection proposal;
- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,

Jesse Goldstein

390 Wheeler Ave Redwood City, CA 94061-3747 jgoldstein@ucsb.edu

Honey, Julian@Coastal

From: judydowning@everyactioncustom.com on behalf of Judith Downing
<judydowning@everyactioncustom.com>
Sent: Thursday, May 1, 2025 9:05 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

I urge you to:

- Reject Pacifica's SSRA policy as currently drafted;
- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
- Require meaningful, site-based mitigation for any shoreline protection proposal;
- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,
Judith Downing
1809 Ray Dr Burlingame, CA 94010-4667
judydowning@sbcglobal.net

Honey, Julian@Coastal

From: kara.a.cox@everyactioncustom.com on behalf of Kara Cox
<kara.a.cox@everyactioncustom.com>
Sent: Thursday, May 1, 2025 9:04 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

I urge you to:

- Reject Pacifica's SSRA policy as currently drafted;
- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
- Require meaningful, site-based mitigation for any shoreline protection proposal;
- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,

Kara Cox

3567 Boyer Cir Lafayette, CA 94549-4901 kara.a.cox@gmail.com

Honey, Julian@Coastal

From: martin.n.montoro@everyactioncustom.com on behalf of Martin Montoro
<martin.n.montoro@everyactioncustom.com>
Sent: Thursday, May 1, 2025 9:03 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP
Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

I urge you to:

- Reject Pacifica's SSRA policy as currently drafted;
- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
- Require meaningful, site-based mitigation for any shoreline protection proposal;
- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,

Martin Montoro

3443 Hickerson Dr San Jose, CA 95127-4315 martin.n.montoro@gmail.com

Honey, Julian@Coastal

From: susanlessin@everyactioncustom.com on behalf of Susan Lessin
<susanlessin@everyactioncustom.com>
Sent: Thursday, May 1, 2025 9:02 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

I urge you to:

- Reject Pacifica's SSRA policy as currently drafted;
- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
- Require meaningful, site-based mitigation for any shoreline protection proposal;
- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,

Susan Lessin

820 Sea Spray Ln Apt 301 Foster City, CA 94404-2449 susanlessin@comcast.net

Honey, Julian@Coastal

From: ngkrop@everyactioncustom.com on behalf of Nancy Krop
<ngkrop@everyactioncustom.com>
Sent: Thursday, May 1, 2025 9:02 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

I urge you to:

- Reject Pacifica's SSRA policy as currently drafted;
- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
- Require meaningful, site-based mitigation for any shoreline protection proposal;
- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,

Nancy Krop

3790 El Camino Real No 344 Palo Alto, CA 94306-3314 ngkrop@gmail.com

Honey, Julian@Coastal

From: golden3428@everyactioncustom.com on behalf of Kevin Golden <golden3428@everyactioncustom.com>
Sent: Thursday, May 1, 2025 9:01 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

I urge you to:

- Reject Pacifica's SSRA policy as currently drafted;
- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
- Require meaningful, site-based mitigation for any shoreline protection proposal;
- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,

Kevin Golden

2378 Woodland Ave San Jose, CA 95128-1366 golden3428@yahoo.com

Honey, Julian@Coastal

From: ciaralow.au@everyactioncustom.com on behalf of Ciara Low
<ciaralow.au@everyactioncustom.com>
Sent: Thursday, May 1, 2025 9:00 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

As an East Palo Alto resident, I frequently made the drive to Pacifica and nearby beaches to surf, swim, and hike. Not only does this plan threaten our incredible beaches and the greater coastal ecosystem, it also presents other challenges down the road due to factors like erosion.

I urge you to:

- Reject Pacifica's SSRA policy as currently drafted;
- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
- Require meaningful, site-based mitigation for any shoreline protection proposal;
- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,

Ciara Low

1159 Sage St East Palo Alto, CA 94303-2029 ciaralow.au@gmail.com

Honey, Julian@Coastal

From: Rlhorne@everyactioncustom.com on behalf of Rick Horne
<Rlhorne@everyactioncustom.com>
Sent: Thursday, May 1, 2025 9:00 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

I urge you to:

- Reject Pacifica's SSRA policy as currently drafted;
- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
- Require meaningful, site-based mitigation for any shoreline protection proposal;
- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,
Rick Horne
778 Inwood Dr Campbell, CA 95008-4437
Rlhorne@sbcglobal.net

Honey, Julian@Coastal

From: mdelay@everyactioncustom.com on behalf of Michael Delay
<mdelay@everyactioncustom.com>
Sent: Thursday, May 1, 2025 8:58 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

I urge you to:

- Reject Pacifica's SSRA policy as currently drafted;
- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
- Require meaningful, site-based mitigation for any shoreline protection proposal;
- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,

Michael Delay

305 Tadley Ct Redwood City, CA 94061-4304 mdelay@sbcglobal.net

Honey, Julian@Coastal

From: bcataldo@everyactioncustom.com on behalf of Beth Cataldo
<bcataldo@everyactioncustom.com>
Sent: Thursday, May 1, 2025 8:58 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP
Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

I urge you to:

- Reject Pacifica's SSRA policy as currently drafted;
- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
- Require meaningful, site-based mitigation for any shoreline protection proposal;
- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,
Beth Cataldo
692 8th Ave San Francisco, CA 94118-3702 bcataldo@gmail.com

Honey, Julian@Coastal

From: seaglass103@everyactioncustom.com on behalf of Patricia Blevins <seaglass103@everyactioncustom.com>
Sent: Thursday, May 1, 2025 8:56 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

I urge you to:

- Reject Pacifica's SSRA policy as currently drafted;
- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
- Require meaningful, site-based mitigation for any shoreline protection proposal;
- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,
Patricia Blevins
1248 Bryan Ave San Jose, CA 95118-1808
seaglass103@sbcglobal.net

Honey, Julian@Coastal

From: rutledge@everyactioncustom.com on behalf of Julie Beer
<rutledge@everyactioncustom.com>
Sent: Thursday, May 1, 2025 8:56 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

I urge you to:

- Reject Pacifica's SSRA policy as currently drafted;
- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
- Require meaningful, site-based mitigation for any shoreline protection proposal;
- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,

Julie Beer

334 College Ave Apt E Palo Alto, CA 94306-1518 rutledge@yahoo.com

Honey, Julian@Coastal

From: ruthcliff@everyactioncustom.com on behalf of Ruth Clifford
<ruthcliff@everyactioncustom.com>
Sent: Thursday, May 1, 2025 8:55 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

I urge you to:

- Reject Pacifica's SSRA policy as currently drafted;
- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
- Require meaningful, site-based mitigation for any shoreline protection proposal;
- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,

Ruth Clifford

1505 De Rose Way Apt 94 San Jose, CA 95126-4135 ruthcliff@aol.com

Honey, Julian@Coastal

From: vickie.rozell@everyactioncustom.com on behalf of Vickie Rozell
<vickie.rozell@everyactioncustom.com>
Sent: Thursday, May 1, 2025 8:55 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

I strongly urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

I urge you to:

- Reject Pacifica's SSRA policy as currently drafted;
- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
- Require meaningful, site-based mitigation for any shoreline protection proposal;
- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,
Vickie Rozell
222 High St Palo Alto, CA 94301-1040
vickie.rozell@alumni.stanford.edu

Honey, Julian@Coastal

From: fiona.b.baker@everyactioncustom.com on behalf of Fiona Baker
<fiona.b.baker@everyactioncustom.com>
Sent: Thursday, May 1, 2025 8:55 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

I urge you to:

- Reject Pacifica's SSRA policy as currently drafted;
- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
- Require meaningful, site-based mitigation for any shoreline protection proposal;
- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,

Fiona Baker

1260 Hopkins St Apt 49 Berkeley, CA 94702-1155 fiona.b.baker@gmail.com

Honey, Julian@Coastal

From: terryteitelbaum@everyactioncustom.com on behalf of Terry Teitelbaum
<terryteitelbaum@everyactioncustom.com>
Sent: Thursday, May 1, 2025 8:54 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP
Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

I care deeply about the health of our beaches. That's why I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

Please:

- Reject Pacifica's SSRA policy as currently drafted;
- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
- Require meaningful, site-based mitigation for any shoreline protection proposal;
- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Thank you!

Sincerely,

Terry Teitelbaum

112 Glenview St Santa Cruz, CA 95062-3458 terryteitelbaum@gmail.com

Honey, Julian@Coastal

From: ratnerellen@everyactioncustom.com on behalf of Ellen Ratner
<ratnerellen@everyactioncustom.com>
Sent: Thursday, May 1, 2025 8:53 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

I urge you to:

- Reject Pacifica's SSRA policy as currently drafted;
- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
- Require meaningful, site-based mitigation for any shoreline protection proposal;
- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,

Ellen Ratner

318 Costello Dr Los Altos, CA 94024-4707 ratnerellen@gmail.com

Honey, Julian@Coastal

From: sgrey3110@everyactioncustom.com on behalf of Suzanne Grey <sgrey3110@everyactioncustom.com>
Sent: Thursday, May 1, 2025 8:53 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

I urge you to:

- Reject Pacifica's SSRA policy as currently drafted;
- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
- Require meaningful, site-based mitigation for any shoreline protection proposal;
- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

I reject Pacifica's proposed SSRAs! Neighborhood-scale seawalls should not be permissible under the Coastal Act and will not protect our beaches and coastlines!

Sincerely,
Suzanne Grey

Sincerely,
Suzanne Grey
5376 Woodstock Way San Jose, CA 95118-2956 sgrey3110@gmail.com

Honey, Julian@Coastal

From: shannonrmcentee@everyactioncustom.com on behalf of Shannon McEntee
<shannonrmcentee@everyactioncustom.com>
Sent: Thursday, May 1, 2025 8:53 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP
Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

I urge you to:

- Reject Pacifica's SSRA policy as currently drafted;
- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
- Require meaningful, site-based mitigation for any shoreline protection proposal;
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Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,

Shannon McEntee

410 Sheridan Ave Apt 216 Palo Alto, CA 94306-2021 shannonrmcentee@gmail.com

Honey, Julian@Coastal

From: pjholbert@everyactioncustom.com on behalf of Patricia Holbert
<pjholbert@everyactioncustom.com>
Sent: Thursday, May 1, 2025 8:52 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

I urge you to:

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- Prioritize nature-based solutions and adaptive realignment of infrastructure.

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Sincerely,
Patricia Holbert
400 Ponza Ln Soquel, CA 95073-9528
pjholbert@gmail.com

Honey, Julian@Coastal

From: jhgottlieb@everyactioncustom.com on behalf of Gottlieb Jonathan
<jhgottlieb@everyactioncustom.com>
Sent: Thursday, May 1, 2025 8:52 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP
Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

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Sincerely,
Gottlieb Jonathan
4 Greenwood Rd Natick, MA 01760-3346
jhgottlieb@gmail.com

Honey, Julian@Coastal

From: ncmartin@everyactioncustom.com on behalf of Nancy Martin
<ncmartin@everyactioncustom.com>
Sent: Thursday, May 1, 2025 8:51 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

I urge you to:

- Reject Pacifica's SSRA policy as currently drafted;
- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
- Require meaningful, site-based mitigation for any shoreline protection proposal;
- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,

Nancy Martin

777 San Antonio Rd Apt 132 Palo Alto, CA 94303-4858 ncmartin@comcast.net

Honey, Julian@Coastal

From: williamsdemilo1@everyactioncustom.com on behalf of DEMILO WILLIAMS
<williamsdemilo1@everyactioncustom.com>
Sent: Thursday, May 1, 2025 8:51 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP
Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

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Sincerely,
DEMILO WILLIAMS
2405 6th St Columbus, GA 31906-3775
williamsdemilo1@gmail.com

Honey, Julian@Coastal

From: judgemoo@everyactioncustom.com on behalf of Charlene Henley
<judgemoo@everyactioncustom.com>
Sent: Thursday, May 1, 2025 8:51 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

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Sincerely,
Charlene Henley
5275 Country Oak Ct San Jose, CA 95136-3608 judgemoo@aol.com

Honey, Julian@Coastal

From: rsguggenheim@everyactioncustom.com on behalf of Regina Guggenheim
<rsguggenheim@everyactioncustom.com>
Sent: Thursday, May 1, 2025 8:51 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP
Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

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- Prioritize nature-based solutions and adaptive realignment of infrastructure.

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Sincerely,

Regina Guggenheim

1074 Gull Ave Foster City, CA 94404-1445 rsguggenheim@gmail.com

Honey, Julian@Coastal

From: owingsbam@everyactioncustom.com on behalf of Brooke Owings
<owingsbam@everyactioncustom.com>
Sent: Thursday, May 1, 2025 8:50 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP
Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

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- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
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Sincerely,

Brooke Owings

145 Haverhill Ct San Jose, CA 95139-1223 owingsbam@gmail.com

Honey, Julian@Coastal

From: tucson103@everyactioncustom.com on behalf of Susan Bryan <tucson103@everyactioncustom.com>
Sent: Thursday, May 1, 2025 8:49 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

Please vote against the sea walls in Pacifica. They do not work. In fact, they are counterproductive -- Seawalls have proved to shrink beaches. Why do this in Pacifica?

Please look for real solutions OR -- let nature take its own path.

I know the people proposing the seawalls mean well, but the evidence is that seawalls will not help in the long run!

VOTE AGAINST SEAWALLS, please!

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

I urge you to:

- Reject Pacifica's SSRA policy as currently drafted;
- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
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Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,

Susan Bryan

222 Blackburn Ave Menlo Park, CA 94025-2706 tucson103@att.net

Honey, Julian@Coastal

From: lwaag@everyactioncustom.com on behalf of Lisa Waag
<lwaag@everyactioncustom.com>
Sent: Thursday, May 1, 2025 8:48 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

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Sincerely,

Lisa Waag

665 Lancaster Blvd Moss Beach, CA 94038-9736 lwaag@yahoo.com

Honey, Julian@Coastal

From: vatincher@everyactioncustom.com on behalf of Virginia Tincher
<vatincher@everyactioncustom.com>
Sent: Thursday, May 1, 2025 8:48 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

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Sincerely,
Virginia Tincher
879 Garland Dr Palo Alto, CA 94303-3606 vatincher@gmail.com

Honey, Julian@Coastal

From: jan@everyactioncustom.com on behalf of jan merryweather
<jan@everyactioncustom.com>
Sent: Thursday, May 1, 2025 8:48 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

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I urge you to:

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- Require meaningful, site-based mitigation for any shoreline protection proposal;
- Prioritize nature-based solutions and adaptive realignment of infrastructure.

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Sincerely,

jan merryweather

477 Everett Ave Palo Alto, CA 94301-1509 jan@hamilton.com

Honey, Julian@Coastal

From: m_laroche730@everyactioncustom.com on behalf of Michelle LaRoche <m_laroche730@everyactioncustom.com>
Sent: Thursday, May 1, 2025 8:46 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

We are in unprecedented times that require new and complex ways of thinking. Plans need to be looked at for their full impact and not short term solutions that only cause other problems.

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

Based on this, please take action to:

- Reject Pacifica's SSRA policy as currently drafted;
- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
- Require meaningful, site-based mitigation for any shoreline protection proposal;
- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,

Michelle LaRoche

601 Almarida Dr Apt A12 Campbell, CA 95008-0248 m_laroche730@yahoo.com

Honey, Julian@Coastal

From: stephen.l.mchenry@everyactioncustom.com on behalf of Stephen McHenry
<stephen.l.mchenry@everyactioncustom.com>
Sent: Thursday, May 1, 2025 8:46 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

Seawalls actively reduce beaches and at times to almost nothing, There have been news photos of the results of these alterations reducing or disappearing beaches.

I urge you to:

- Reject Pacifica's SSRA policy as currently drafted;
- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
- Require meaningful, site-based mitigation for any shoreline protection proposal;
- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,

Stephen McHenry

439 Chateau La Salle Dr San Jose, CA 95111-3036 stephen.l.mchenry@gmail.com

Honey, Julian@Coastal

From: carolyn.rosyfinch.straub@everyactioncustom.com on behalf of Carolyn Straub
<carolyn.rosyfinch.straub@everyactioncustom.com>
Sent: Thursday, May 1, 2025 8:45 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP
Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

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Seawalls actively reduce beaches and at times to almost nothing, There have been news photos of the results of these alterations reducing or disappearing beaches.

I urge you to:

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- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
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Sincerely,

Carolyn Straub

439 Chateau La Salle Dr San Jose, CA 95111-3036 carolyn.rosyfinch.straub@gmail.com

Honey, Julian@Coastal

From: snickerdoodle650@everyactioncustom.com on behalf of Debby Dern
<snickerdoodle650@everyactioncustom.com>
Sent: Thursday, May 1, 2025 8:44 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

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Sincerely,

Debby Dern

3719 Callan Blvd South San Francisco, CA 94080-5123 snickerdoodle650@yahoo.com

Honey, Julian@Coastal

From: alekswolska2021@everyactioncustom.com on behalf of Aleksandra Wolska
<alekswolska2021@everyactioncustom.com>
Sent: Thursday, May 1, 2025 8:44 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP
Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

DO NOT ENGAGE / PROMOTE FURTHER ENVIRONMENTAL DEGRADATION, PLEASE!!

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

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Sincerely,

Aleksandra Wolska

2888 Sandy Ln Santa Cruz, CA 95062-3537 alekswolska2021@gmail.com

Honey, Julian@Coastal

From: stabenjeff@everyactioncustom.com on behalf of Jeff Staben
<stabenjeff@everyactioncustom.com>
Sent: Thursday, May 1, 2025 8:43 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss. Moreover, after these real estate associations have stopped you from getting a SLR plan in place, they are now going through you to have shoreline protection designed in the area that is falling into the ocean. Additionally they are building a new very dense housing plan on unsafe land which you will hear soon.

I urge you to:

- Reject Pacifica's SSRA policy as currently drafted;
- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
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Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations. Please uphold the Coastal Act and the original Coastal Plan you prepared in the early 1970s.

Sincerely,

Jeff Staben

129 Darlington Ln Soquel, CA 95073-2847 stabenjeff@gmail.com

Honey, Julian@Coastal

From: julie.cruzal@everyactioncustom.com on behalf of Julie Cruzal
<julie.cruzal@everyactioncustom.com>
Sent: Thursday, May 1, 2025 8:43 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

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Sincerely,
Julie Cruzal
850 Gale Dr Campbell, CA 95008-0903
julie.cruzal@gmail.com

Honey, Julian@Coastal

From: fairwaybird@everyactioncustom.com on behalf of Robin Crews
<fairwaybird@everyactioncustom.com>
Sent: Thursday, May 1, 2025 8:43 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

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Sincerely,
Robin Crews
3340 Roop Rd Gilroy, CA 95020-9096
fairwaybird@att.net

Honey, Julian@Coastal

From: jangell@everyactioncustom.com on behalf of JL Angell
<jangell@everyactioncustom.com>
Sent: Thursday, May 1, 2025 8:43 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

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Sincerely,

JL Angell

2391 Ponderosa Rd Rescue, CA 95672-9411 jangell@earthlink.net

Honey, Julian@Coastal

From: kathydyer@everyactioncustom.com on behalf of Kathy Dyer
<kathydyer@everyactioncustom.com>
Sent: Thursday, May 1, 2025 8:43 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP
Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

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Sincerely,
Kathy Dyer
190 Noyo Dr San Jose, CA 95123-3721
kathydyer@yahoo.com

Honey, Julian@Coastal

From: towie56@everyactioncustom.com on behalf of Caroline Bering <towie56@everyactioncustom.com>
Sent: Thursday, May 1, 2025 8:43 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

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Sincerely,

Caroline Bering

1217 Awalt Dr Apt C Mountain View, CA 94040-4565 towie56@yahoo.com

Honey, Julian@Coastal

From: emonneabedini@everyactioncustom.com on behalf of Emonne Abedini
<emonneabedini@everyactioncustom.com>
Sent: Thursday, May 1, 2025 8:42 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

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Sincerely,

Emonne Abedini

1927 Bridgepointe Pkwy San Mateo, CA 94404-5002 emonneabedini@gmail.com

Honey, Julian@Coastal

From: toby@everyactioncustom.com on behalf of Toby Cooper
<toby@everyactioncustom.com>
Sent: Thursday, May 1, 2025 8:41 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

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Sincerely,
Toby Cooper
PO Box 249 Eastsound, WA 98245-0249
toby@tobycooper.net

Honey, Julian@Coastal

From: ederaynal@everyactioncustom.com on behalf of Etienne De Raynal
<ederaynal@everyactioncustom.com>
Sent: Thursday, May 1, 2025 8:41 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

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Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,

Etienne De Raynal

1372 Richard St San Luis Obispo, CA 93401-5903 ederaynal@gmail.com

Honey, Julian@Coastal

From: marbis99@everyactioncustom.com on behalf of Mark Bishop <marbis99@everyactioncustom.com>
Sent: Thursday, May 1, 2025 8:40 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

I urge you to:

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- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
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- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Thank you for your kind and thoughtful leadership on this important matter.

Sincerely,

Mark Bishop

2464 Anna Dr # 3 Santa Clara, CA 95050-4405 marbis99@hotmail.com

Honey, Julian@Coastal

From: russweisz1@everyactioncustom.com on behalf of Russell Weisz <russweisz1@everyactioncustom.com>
Sent: Thursday, May 1, 2025 8:40 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

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Sincerely,

Russell Weisz

319 Laguna St Santa Cruz, CA 95060-6109 russweisz1@gmail.com

Honey, Julian@Coastal

From: mqqwest@everyactioncustom.com on behalf of Mariquita West
<mqqwest@everyactioncustom.com>
Sent: Thursday, May 1, 2025 8:40 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

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Sincerely,

Mariquita West

501 Portola Rd Apt 8084 Portola Valley, CA 94028-7689 mqqwest@gmail.com

Honey, Julian@Coastal

From: jessica_jasper@everyactioncustom.com on behalf of Jessica Jasper
<jessica_jasper@everyactioncustom.com>
Sent: Thursday, May 1, 2025 8:39 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

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Sincerely,

Jessica Jasper

876 Eucalyptus Ave Novato, CA 94947-2035 jessica_jasper@hotmail.com

Honey, Julian@Coastal

From: hutches1@everyactioncustom.com on behalf of Julie Hutcheson <hutches1@everyactioncustom.com>
Sent: Thursday, May 1, 2025 8:37 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

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Sincerely,

Julie Hutcheson

1515 Kelly Park Cir Morgan Hill, CA 95037-3397 hutches1@verizon.net

Honey, Julian@Coastal

From: charli_egan@everyactioncustom.com on behalf of Cathleen Guzman
<charli_egan@everyactioncustom.com>
Sent: Thursday, May 1, 2025 8:35 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP
Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

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Sincerely,

Cathleen Guzman

17675 Woodland Ave Morgan Hill, CA 95037-9141 charli_egan@yahoo.com

Honey, Julian@Coastal

From: madeliene2011@everyactioncustom.com on behalf of Madeliene Scheiman
<madeliene2011@everyactioncustom.com>
Sent: Thursday, May 1, 2025 8:35 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP
Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

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Sincerely,

Madeliene Scheiman

1550 Alisal Ave San Jose, CA 95125-5033 madeliene2011@gmail.com

Honey, Julian@Coastal

From: alicheckaufman@everyactioncustom.com on behalf of Alice Kaufman
<aliceckaufman@everyactioncustom.com>
Sent: Thursday, May 1, 2025 8:32 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP
Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

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Sincerely,

Alice Kaufman
Redwood City

Sincerely,
Alice Kaufman
704 Barbour Dr Redwood City, CA 94062-3014 alicheckaufman@gmail.com

Honey, Julian@Coastal

From: ms.marsha-v-l@everyactioncustom.com on behalf of Marsha Lowry <ms.marsha-v-l@everyactioncustom.com>
Sent: Thursday, May 1, 2025 8:31 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

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Sincerely,

Marsha Lowry

1070 Mitchell Way El Sobrante, CA 94803-1023 ms.marsha-v-l@comcast.net

Honey, Julian@Coastal

From: georgia.crowley14@everyactioncustom.com on behalf of Georgia Crowley
<georgia.crowley14@everyactioncustom.com>
Sent: Thursday, May 1, 2025 8:30 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

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I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

We need to plan for the long term future, not the short term benefit of neighborhoods.

I live on sand stone cliffs and the end of my street is the only piece left that is not covered in sea wall. The feeling of the sandstone is soft and comforting. The feeling of the sea wall is rough and toxic. The sea walls degrade over time and leave rebar poles and rough concrete in their place. Certain areas have seen erosion underneath the sea wall that go unseen and turn into sink holes.

I urge you to:

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Sincerely,
Georgia Crowley
644 37th Ave Santa Cruz, CA 95062-5123
georgia.crowley14@gmail.com

Honey, Julian@Coastal

From: nhtierney@everyactioncustom.com on behalf of Nancy Tierney
<nhtierney@everyactioncustom.com>
Sent: Thursday, May 1, 2025 8:28 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP
Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

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Sincerely,

Nancy Tierney

535 Del Mar Ave Pacifica, CA 94044-1908 nhtierney@gmail.com

Honey, Julian@Coastal

From: flyingcat95033@everyactioncustom.com on behalf of Michelle Waters <flyingcat95033@everyactioncustom.com>
Sent: Thursday, May 1, 2025 8:27 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

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Sincerely,

Michelle Waters

17755 Cherokee Trl Los Gatos, CA 95033-8817 flyingcat95033@yahoo.com

Honey, Julian@Coastal

From: flyingcat95033@everyactioncustom.com on behalf of Michelle Waters <flyingcat95033@everyactioncustom.com>
Sent: Thursday, May 1, 2025 8:26 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

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Sincerely,

Michelle Waters

17755 Cherokee Trl Los Gatos, CA 95033-8817 flyingcat95033@yahoo.com

Honey, Julian@Coastal

From: lauraalskog@everyactioncustom.com on behalf of Laura Alskog
<lauraalskog@everyactioncustom.com>
Sent: Thursday, May 1, 2025 8:22 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP
Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

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Sincerely,
Laura Alskog
827 A Oneawa St Kailua, HI 96734-2056
lauraalskog@gmail.com

Honey, Julian@Coastal

From: barbaraernymd@everyactioncustom.com on behalf of Barbara Erny
<barbaraernymd@everyactioncustom.com>
Sent: Thursday, May 1, 2025 8:19 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP
Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

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Sincerely,

Barbara Erny

309 Lakeview Way Emerald Hills, CA 94062-3316 barbaraernymd@gmail.com

Honey, Julian@Coastal

From: linaswisher@everyactioncustom.com on behalf of Lina T. Swisher
<linaswisher@everyactioncustom.com>
Sent: Thursday, May 1, 2025 8:18 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

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Sincerely,

Lina T. Swisher

620 Sand Hill Rd Apt 117D Palo Alto, CA 94304-2071 linaswisher@gmail.com

Honey, Julian@Coastal

From: gkarthik.2005@everyactioncustom.com on behalf of Karthikeyan Gopal <gkarthik.2005@everyactioncustom.com>
Sent: Thursday, May 1, 2025 8:18 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

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Sincerely,
Karthikeyan Gopal
825 Kim St Cupertino, CA 95014-4322
gkarthik.2005@gmail.com

Honey, Julian@Coastal

From: descommercial@everyactioncustom.com on behalf of David Simon
<descommercial@everyactioncustom.com>
Sent: Thursday, May 1, 2025 8:17 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

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Sincerely,

David Simon

119 Jordan Ave Los Altos, CA 94022-1257 descommercial@earthlink.net

Honey, Julian@Coastal

From: carolsontag@everyactioncustom.com on behalf of Carol Sontag
<carolsontag@everyactioncustom.com>
Sent: Thursday, May 1, 2025 8:17 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

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Sincerely,

Carol Sontag

280 Golden Oak Dr Portola Valley, CA 94028-7758 carolsontag@sbcglobal.net

Honey, Julian@Coastal

From: yeeaja@everyactioncustom.com on behalf of Aja Yee
<yeeaja@everyactioncustom.com>
Sent: Thursday, May 1, 2025 8:13 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

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Sincerely,

Aja Yee

16 Admiralty Pl Redwood City, CA 94065-1272 yeeaja@gmail.com

Honey, Julian@Coastal

From: vevomen@everyactioncustom.com on behalf of Pat Lang
<vevomen@everyactioncustom.com>
Sent: Thursday, May 1, 2025 7:50 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

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Sincerely,

Pat Lang

25100 Tepa Way Los Altos Hills, CA 94022-4531 vevomen@gmail.com

Honey, Julian@Coastal

From: aaronbrinkerhoff@everyactioncustom.com on behalf of Aaron Brinkerhoff
<aaronbrinkerhoff@everyactioncustom.com>
Sent: Thursday, May 1, 2025 7:49 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP
Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

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I have visited and enjoyed the San Mateo coast beaches my whole life and Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Thank you very much, Aaron Brinkerhoff

Sincerely,

Aaron Brinkerhoff

5 Newcastle Ct San Rafael, CA 94903-4231 aaronbrinkerhoff@gmail.com

Honey, Julian@Coastal

From: samnaifeh@everyactioncustom.com on behalf of Sam Naifeh
<samnaifeh@everyactioncustom.com>
Sent: Thursday, May 1, 2025 7:49 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP
Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

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Sincerely,
Sam Naifeh

2059 New Brunswick Dr San Mateo, CA 94402-4043 samnaifeh@sbcglobal.net

Honey, Julian@Coastal

From: aaronbrinkerhoff@everyactioncustom.com on behalf of Aaron Brinkerhoff
<aaronbrinkerhoff@everyactioncustom.com>
Sent: Thursday, May 1, 2025 7:45 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP
Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

I urge you to:

- Reject Pacifica's SSRA policy as currently drafted;
- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
- Require meaningful, site-based mitigation for any shoreline protection proposal;
- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,

Aaron Brinkerhoff

5 Newcastle Ct San Rafael, CA 94903-4231 aaronbrinkerhoff@gmail.com

Honey, Julian@Coastal

From: lissssa@everyactioncustom.com on behalf of Lisa Curran
<lissssa@everyactioncustom.com>
Sent: Thursday, May 1, 2025 7:43 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

I urge you to:

- Reject Pacifica's SSRA policy as currently drafted;
- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
- Require meaningful, site-based mitigation for any shoreline protection proposal;
- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,

Lisa Curran

743 Schoolhouse Rd San Jose, CA 95138-1314 lissssa@sbcglobal.net

Honey, Julian@Coastal

From: sersnamyjer@everyactioncustom.com on behalf of Serena Myjer
<sersnamyjer@everyactioncustom.com>
Sent: Wednesday, April 30, 2025 10:29 PM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

I urge you to:

- Reject Pacifica's SSRA policy as currently drafted;
- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
- Require meaningful, site-based mitigation for any shoreline protection proposal;
- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,

Serena Myjer

1169 Minnesota Ave Unit 2 San Jose, CA 95125-3372 sersnamyjer@pm.me

Honey, Julian@Coastal

From: Islaff@everyactioncustom.com on behalf of Lee Slaff <Islaff@everyactioncustom.com>
Sent: Wednesday, April 30, 2025 4:49 PM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

I urge you to:

- Reject Pacifica's SSRA policy as currently drafted;
- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
- Require meaningful, site-based mitigation for any shoreline protection proposal;
- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,

Lee Slaff

695 Lockhart Gulch Rd Scotts Valley, CA 95066-3021 Islaff@comcast.net

Honey, Julian@Coastal

From: 19jimdandy46@everyactioncustom.com on behalf of James Pearson <19jimdandy46@everyactioncustom.com>
Sent: Thursday, May 1, 2025 12:02 PM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Follow Up Flag: Follow up
Flag Status: Completed

Dear Chair Cummings and Commissioners,

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

I urge you to:

- Reject Pacifica's SSRA policy as currently drafted;
- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
- Require meaningful, site-based mitigation for any shoreline protection proposal;
- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,

James Pearson

7370 Church St Apt C Gilroy, CA 95020-6165 19jimdandy46@gmail.com

Honey, Julian@Coastal

From: belladane04@everyactioncustom.com on behalf of Margi Fields <belladane04@everyactioncustom.com>
Sent: Friday, May 2, 2025 12:45 PM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

I urge you to:

- Reject Pacifica's SSRA policy as currently drafted;
- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
- Require meaningful, site-based mitigation for any shoreline protection proposal;
- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,
Margi Fields
1800 Daffodil Dr Lodi, CA 95242-9792
belladane04@att.net

Honey, Julian@Coastal

From: nsalcedo2@everyactioncustom.com on behalf of Nan Salcedo <nsalcedo2@everyactioncustom.com>
Sent: Friday, May 2, 2025 12:36 PM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

I urge you to:

- Reject Pacifica's SSRA policy as currently drafted;
- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
- Require meaningful, site-based mitigation for any shoreline protection proposal;
- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,
Nan Salcedo
PO Box 759 Pacifica, CA 94044-0759
nsalcedo2@comcast.net

Honey, Julian@Coastal

From: denise_louie_sf@everyactioncustom.com on behalf of Denise Louie
<denise_louie_sf@everyactioncustom.com>
Sent: Friday, May 2, 2025 10:41 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

I believe seawalls are a waste of money, because Nature will claim them in the long run. In the near term, they benefit relatively few people.

I urge you to:

- Reject Pacifica's SSRA policy as currently drafted;
- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
- Require meaningful, site-based mitigation for any shoreline protection proposal;
- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,

Denise Louie

11 Malta Dr San Francisco, CA 94131-2815 denise_louie_sf@yahoo.com

Honey, Julian@Coastal

From: mdimbi@everyactioncustom.com on behalf of madeline schleimer
<mdimbi@everyactioncustom.com>
Sent: Friday, May 2, 2025 10:32 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP
Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

I urge you to:

- Reject Pacifica's SSRA policy as currently drafted;
- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
- Require meaningful, site-based mitigation for any shoreline protection proposal;
- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,
madeline schleimer
1779 N Allen Ave Pasadena, CA 91104-1612 mdimbi@gmail.com

Honey, Julian@Coastal

From: popcorn@everyactioncustom.com on behalf of Susan Mullaney
<popcorn@everyactioncustom.com>
Sent: Friday, May 2, 2025 10:14 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP
Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

Please, please reject the City of Pacifica's current draft of their Land Use Local Coastal Plan. Their plan will result in coastal harm to the both the beaches and the underwater ecosystems.

The City of Pacifica must not be permitted to build neighborhood-scale seawalls.

Rather than interfering with nature to allow human infrastructure, Pacifica must adjust their infrastructure plans.

Decisions that you make here will affect the coast up and down California. This is consequential and will be devastating to our coastal ecosystems.

Please protect our coasts by rejecting the Pacifica's Land Use Local Coastal Plan in its current draft and any draft of it that creates "Special Shoreline Resiliency Areas" and that permits seawalls.

Sincerely,
Susan Mullaney
1434 9th Ave San Francisco, CA 94122-3658 popcorn@gmail.com

Honey, Julian@Coastal

From: boistree78@everyactioncustom.com on behalf of angiee boissevain <boistree78@everyactioncustom.com>
Sent: Friday, May 2, 2025 10:03 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

I urge you to:

- Reject Pacifica's SSRA policy as currently drafted;
- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
- Require meaningful, site-based mitigation for any shoreline protection proposal;
- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

This is truly

Sincerely,
angiee boissevain
1788 Ellen Ave San Jose, CA 95125-2517
boistree78@att.net

Honey, Julian@Coastal

From: arshiamohan164@everyactioncustom.com on behalf of Arshia Mohan
<arshiamohan164@everyactioncustom.com>
Sent: Friday, May 2, 2025 9:45 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP
Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

I urge you to:

- Reject Pacifica's SSRA policy as currently drafted;
- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
- Require meaningful, site-based mitigation for any shoreline protection proposal;
- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,
Arshia Mohan
4887 Rogers Ave Fremont, CA 94536-7155
arshiamohan164@gmail.com

Honey, Julian@Coastal

From: jonpedigo@everyactioncustom.com on behalf of Jon Pedigo
<jonpedigo@everyactioncustom.com>
Sent: Friday, May 2, 2025 9:13 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP
Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

My family has lived in Pacifica since 1957. I moved back to town 10 years ago to the house where I grew up. I remember the beaches I used to play on by the pier that are no longer there. I recognize the need for local business to have environmental protection, but a solution of a sea wall seems to be a bandaid to a problem that cannot be solved with our existing civil engineering technology.

I therefore urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

I urge you to:

- Reject Pacifica's SSRA policy as currently drafted;
- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
- Require meaningful, site-based mitigation for any shoreline protection proposal;
- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,
Jon Pedigo
1220 Crespi Dr Pacifica, CA 94044-3601
jonpedigo@mac.com

Honey, Julian@Coastal

From: jimdar@everyactioncustom.com on behalf of James Marshall
<jimdar@everyactioncustom.com>
Sent: Friday, May 2, 2025 8:29 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

I urge you to:

- Reject Pacifica's SSRA policy as currently drafted;
- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
- Require meaningful, site-based mitigation for any shoreline protection proposal;
- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,

James Marshall

988 Patricia Way San Jose, CA 95125-2369 jimdar@pacbell.net

Honey, Julian@Coastal

From: janetpsself@everyactioncustom.com on behalf of Janet Self
<janetpsself@everyactioncustom.com>
Sent: Friday, May 2, 2025 8:18 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

I urge you to:

- Reject Pacifica's SSRA policy as currently drafted;
- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
- Require meaningful, site-based mitigation for any shoreline protection proposal;
- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,

Janet Self

120 Audiffred Ln Woodside, CA 94062-3606 janetpsself@gmail.com

Honey, Julian@Coastal

From: dlarthur@everyactioncustom.com on behalf of Derede Arthur
<dlarthur@everyactioncustom.com>
Sent: Friday, May 2, 2025 8:12 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

New seawalls are a really bad idea in the era of climate change, producing MORE erosion and shoreline loss -- as any number of reports show! Therefore, I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

I urge you to:

- Reject Pacifica's SSRA policy as currently drafted;
- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
- Require meaningful, site-based mitigation for any shoreline protection proposal;
- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,

Derede Arthur

1266 Old Stage Rd Salinas, CA 93908-9796 dlarthur@ucsc.edu

Honey, Julian@Coastal

From: davydavidson@everyactioncustom.com on behalf of Davy Davidson
<davydavidson@everyactioncustom.com>
Sent: Friday, May 2, 2025 7:38 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

I urge you to:

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- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
- Require meaningful, site-based mitigation for any shoreline protection proposal;
- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,

Davy Davidson

221 Main St Unit 1939 Los Altos, CA 94023-9047 davydavidson@gmail.com

Honey, Julian@Coastal

From: melanie@everyactioncustom.com on behalf of Melanie Cross
<melanie@everyactioncustom.com>
Sent: Friday, May 2, 2025 7:35 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

I urge you to:

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- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
- Require meaningful, site-based mitigation for any shoreline protection proposal;
- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,

Melanie Cross

945 Matadero Ave Palo Alto, CA 94306-2608 melanie@pcross.com

Honey, Julian@Coastal

From: anne.renee.spicer@everyactioncustom.com on behalf of Anne Spicer
<anne.renee.spicer@everyactioncustom.com>
Sent: Friday, May 2, 2025 6:55 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP
Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

I urge you to:

- Reject Pacifica's SSRA policy as currently drafted;
- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
- Require meaningful, site-based mitigation for any shoreline protection proposal;
- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,
Anne Spicer
45 S 17th St San Jose, CA 95112-2032
anne.renee.spicer@gmail.com

Honey, Julian@Coastal

From: anita.e.kari@everyactioncustom.com on behalf of Anita Rinehart
<anita.e.kari@everyactioncustom.com>
Sent: Friday, May 2, 2025 6:35 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP
Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

I urge you to:

- Reject Pacifica's SSRA policy as currently drafted;
- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
- Require meaningful, site-based mitigation for any shoreline protection proposal;
- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,

Anita Rinehart

698 Rustic Ln Mountain View, CA 94040-3054 anita.e.kari@gmail.com

Honey, Julian@Coastal

From: fam.grzan@everyactioncustom.com on behalf of Mark Grzan
<fam.grzan@everyactioncustom.com>
Sent: Friday, May 2, 2025 6:28 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP
Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

No we are NOT going to approve the City of Pacifica's changes to their Land Use Local Coastal Plan. The plan that the comission approved must stand the test of time and their assaults.

Protect our beaches and waves – and the public's right to access them.

Mark Grzan
Former Councilmember and Mayor Pro Tem
City of Morgan Hill

fam.grzan@charter.net

Sincerely,
Mark Grzan
680 Alamo Dr Morgan Hill, CA 95037-5706 fam.grzan@charter.net

Honey, Julian@Coastal

From: RCLEESE@everyactioncustom.com on behalf of Rose Marie Cleese
<RCLEESE@everyactioncustom.com>
Sent: Friday, May 2, 2025 3:11 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

I urge you to:

- Reject Pacifica's SSRA policy as currently drafted;
- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
- Require meaningful, site-based mitigation for any shoreline protection proposal;
- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,

Rose Marie Cleese

822 38th Ave San Francisco, CA 94121-3412 RCLEESE@EARTHLINK.NET

Honey, Julian@Coastal

From: jillchalloran@everyactioncustom.com on behalf of Jill Halloran
<jillchalloran@everyactioncustom.com>
Sent: Friday, May 2, 2025 1:16 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP
Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

The City of Pacifica's current draft of their Land Use Local Coastal Plan must not go forward. It sets up "Special Shoreline Resiliency Areas," which are known to cause beach erosion. Please don't put our beaches at risk, and relies on seawalls which actively contribute to beach loss.

Please protect our beaches up and down the coast - this decision could affect the entire coast.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,
Jill Halloran
503 6th St Pacific Grove, CA 93950-4612 jillchalloran@gmail.com

Honey, Julian@Coastal

From: jrogers@everyactioncustom.com on behalf of Connie Rogers
<jrogers@everyactioncustom.com>
Sent: Thursday, May 1, 2025 10:50 PM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss. My son's family live near Monterey Bay and I would hate to have their coastline damaged by seawalls.

I urge you to:

- Reject Pacifica's SSRA policy as currently drafted;
- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
- Require meaningful, site-based mitigation for any shoreline protection proposal;
- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,

Connie Rogers

7690 Santa Theresa Dr Gilroy, CA 95020-5524 jrogers@garlic.com

Honey, Julian@Coastal

From: darylcam5@everyactioncustom.com on behalf of Daryl Camarillo <darylcam5@everyactioncustom.com>
Sent: Thursday, May 1, 2025 10:28 PM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

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Sincerely,

Daryl Camarillo

1921 Perry Ave Menlo Park, CA 94025-6143 darylcam5@gmail.com

Honey, Julian@Coastal

From: lizabethmorell@everyactioncustom.com on behalf of Liza Morell
<lizabethmorell@everyactioncustom.com>
Sent: Thursday, May 1, 2025 10:27 PM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP
Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

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Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations and do not allow this dangerous precedent !

Sincerely,
Liza Morell
PO Box 1676 Aptos, CA 95001-1676
lizabethmorell@gmail.com

Honey, Julian@Coastal

From: celticdl@everyactioncustom.com on behalf of Donna Owens
<celticdl@everyactioncustom.com>
Sent: Thursday, May 1, 2025 10:25 PM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

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Sincerely,

Donna Owens

410 Alvarado St Apt D Monterey, CA 93940-2747 celticdl@proton.me

Honey, Julian@Coastal

From: snoozin@everyactioncustom.com on behalf of Susan Anderson
<snoozin@everyactioncustom.com>
Sent: Thursday, May 1, 2025 10:14 PM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

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Sincerely,

Susan Anderson

20789 Scenic Vista Dr San Jose, CA 95120-1203 snoozin@ravelfamily.com

Honey, Julian@Coastal

From: onealk888@everyactioncustom.com on behalf of KATHY O NEAL <onealk888@everyactioncustom.com>
Sent: Thursday, May 1, 2025 9:42 PM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

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Sincerely,

KATHY O NEAL

431 Valley Oak Dr Morgan Hill, CA 95037-9229 onealk888@gmail.com

Honey, Julian@Coastal

From: ranifisc@everyactioncustom.com on behalf of Rani Fischer
<ranifisc@everyactioncustom.com>
Sent: Thursday, May 1, 2025 9:34 PM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

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Sincerely,

Rani Fischer

999 W Evelyn Ter Apt 47 Sunnyvale, CA 94086-6782 ranifisc@gmail.com

Honey, Julian@Coastal

From: axelgvirgallito@everyactioncustom.com on behalf of Axel Virgallito
<axelgvirgallito@everyactioncustom.com>
Sent: Thursday, May 1, 2025 9:30 PM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP
Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

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Sincerely,

Axel Virgallito

414 Washington Blvd Half Moon Bay, CA 94019-1332 axelgvirgallito@gmail.com

Honey, Julian@Coastal

From: sonjavirgallito@everyactioncustom.com on behalf of Sonja Virgallito
<sonjavirgallito@everyactioncustom.com>
Sent: Thursday, May 1, 2025 9:26 PM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP
Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

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Sincerely,

Sonja Virgallito

414 Washington Blvd Half Moon Bay, CA 94019-1332 sonjavirgallito@gmail.com

Honey, Julian@Coastal

From: gregvirgallito@everyactioncustom.com on behalf of Greg Virgallito
<gregvirgallito@everyactioncustom.com>
Sent: Thursday, May 1, 2025 9:24 PM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

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Sincerely,

Greg Virgallito

414 Washington Blvd Half Moon Bay, CA 94019-1332 gregvirgallito@gmail.com

Honey, Julian@Coastal

From: howard@everyactioncustom.com on behalf of Howard Cohen
<howard@everyactioncustom.com>
Sent: Thursday, May 1, 2025 9:17 PM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

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Sincerely,

Howard Cohen

3272 Cowper St Palo Alto, CA 94306-3004 howard@cohensw.com

Honey, Julian@Coastal

From: mevirga@everyactioncustom.com on behalf of Mike Virgallito
<mevirga@everyactioncustom.com>
Sent: Thursday, May 1, 2025 8:57 PM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

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Sincerely,

Mike Virgallito

101 Germaine Ave Santa Cruz, CA 95065-1113 mevirga@comcast.net

Honey, Julian@Coastal

From: shielsth@everyactioncustom.com on behalf of Theresa Shiels
<shielsth@everyactioncustom.com>
Sent: Thursday, May 1, 2025 8:55 PM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

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Sincerely,

Theresa Shiels

178 El Granada Blvd Half Moon Bay, CA 94019-4851 shielsth@gmail.com

Honey, Julian@Coastal

From: dbamm@everyactioncustom.com on behalf of David Arnold
<dbamm@everyactioncustom.com>
Sent: Thursday, May 1, 2025 8:49 PM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

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Sincerely,

David Arnold

1685 New Brunswick Ave Sunnyvale, CA 94087-4261 dbamm@riseup.net

Honey, Julian@Coastal

From: jandjoda@everyactioncustom.com on behalf of John Oda
<jandjoda@everyactioncustom.com>
Sent: Thursday, May 1, 2025 8:46 PM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

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Sincerely,

John Oda

2000 Post St San Francisco, CA 94115-3500 jandjoda@aol.com

Honey, Julian@Coastal

From: beck1739@everyactioncustom.com on behalf of Marilyn Beck <beck1739@everyactioncustom.com>
Sent: Thursday, May 1, 2025 8:37 PM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

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Please stand up for the beaches and the public's right to access them,

Sincerely,

Marilyn Beck

21884 Woodbury Dr Cupertino, CA 95014-1148 beck1739@gmail.com

Honey, Julian@Coastal

From: kras2nova@everyactioncustom.com on behalf of Carol Krasilnikoff
<kras2nova@everyactioncustom.com>
Sent: Thursday, May 1, 2025 8:35 PM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP
Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

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Sincerely,

Carol Krasilnikoff

651 Santa Barbara Ave Millbrae, CA 94030-1126 kras2nova@aol.com

Honey, Julian@Coastal

From: grnfthlls@everyactioncustom.com on behalf of Thomas Carlino
<grnfthlls@everyactioncustom.com>
Sent: Thursday, May 1, 2025 8:30 PM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

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Sincerely,

Thomas Carlino

549 Quail Bush Ct San Jose, CA 95117-4202 grnfthlls@axomoxa.com

Honey, Julian@Coastal

From: amarisims88@everyactioncustom.com on behalf of Amari Sims <amarisims88@everyactioncustom.com>
Sent: Thursday, May 1, 2025 8:28 PM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

Dear California Coastal Commission Staff,

My name is Amari Sims and I am 14 years old. Saving marine life and preserving coastal beaches is very important to me. My family and I have created great memories and experiences there. I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

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Sincerely,

Amari Sims

Member of Silicon Valley Youth Climate Action - San Jose Team

Sincerely,

Amari Sims

3972 Blue Gum Dr San Jose, CA 95127-2511 amarisims88@gmail.com

Honey, Julian@Coastal

From: aamartineau@everyactioncustom.com on behalf of Alice Anne Martineau
<aamartineau@everyactioncustom.com>
Sent: Thursday, May 1, 2025 8:22 PM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP
Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

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Sincerely,

Alice Anne Martineau

310 Velarde St Mountain View, CA 94041-2244 aamartineau@sbcglobal.net

Honey, Julian@Coastal

From: jandjoda@everyactioncustom.com on behalf of John Oda
<jandjoda@everyactioncustom.com>
Sent: Thursday, May 1, 2025 8:15 PM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

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Sincerely,

John Oda

2000 Post St San Francisco, CA 94115-3500 jandjoda@aol.com

Honey, Julian@Coastal

From: cdloo@everyactioncustom.com on behalf of Chris Loo
<cdloo@everyactioncustom.com>
Sent: Thursday, May 1, 2025 8:01 PM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

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Sincerely,

Chris Loo

16920 Sorrel Way Morgan Hill, CA 95037-3864 cdloo@hotmail.com

Honey, Julian@Coastal

From: pol1@everyactioncustom.com on behalf of Stephen Rosenblum <pol1@everyactioncustom.com>
Sent: Thursday, May 1, 2025 7:54 PM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

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Sincerely,
Stephen Rosenblum
212 Santa Rita Ave Palo Alto, CA 94301-3939 pol1@rosenblums.us

Honey, Julian@Coastal

From: jbenioff@everyactioncustom.com on behalf of Jeanne Benioff
<jbenioff@everyactioncustom.com>
Sent: Thursday, May 1, 2025 7:40 PM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

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Sincerely,

Jeanne Benioff

765 Upland Rd Redwood City, CA 94062-3042 jbenioff@comcast.net

Honey, Julian@Coastal

From: millersusan50@everyactioncustom.com on behalf of susan Miller <millersusan50@everyactioncustom.com>
Sent: Thursday, May 1, 2025 7:27 PM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

I urge you to:

- Reject Pacifica's SSRA policy as currently drafted;
- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
- Require meaningful, site-based mitigation for any shoreline protection proposal;
- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Susan Miller

Sincerely,
susan Miller
114 Bay View Rd Pacifica, CA 94044-3201 millersusan50@comcast.net

Honey, Julian@Coastal

From: mltswhite@everyactioncustom.com on behalf of Marcia White
<mltswhite@everyactioncustom.com>
Sent: Thursday, May 1, 2025 7:23 PM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

I urge you to:

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- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
- Require meaningful, site-based mitigation for any shoreline protection proposal;
- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,

Marcia White

109 Hawthorne Ave Los Altos, CA 94022-3704 mltswhite@yahoo.com

Honey, Julian@Coastal

From: oshmail2000-1326@everyactioncustom.com on behalf of Mark Luiso
<oshmail2000-1326@everyactioncustom.com>
Sent: Thursday, May 1, 2025 7:22 PM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP
Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

I urge you to:

- Reject Pacifica's SSRA policy as currently drafted;
- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
- Require meaningful, site-based mitigation for any shoreline protection proposal;
- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,

Mark Luiso

1258 Sage Hen Ct San Jose, CA 95118-2043 oshmail2000-1326@yahoo.com

Honey, Julian@Coastal

From: shibshman@everyactioncustom.com on behalf of Steven Hibshman
<shibshman@everyactioncustom.com>
Sent: Thursday, May 1, 2025 7:18 PM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP
Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

I urge you to:

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- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
- Require meaningful, site-based mitigation for any shoreline protection proposal;
- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,

Steven Hibshman

609 Celestial Ln Foster City, CA 94404-2751 shibshman@yahoo.com

Honey, Julian@Coastal

From: mandmbekele@everyactioncustom.com on behalf of Mila Bekele
<mandmbekele@everyactioncustom.com>
Sent: Thursday, May 1, 2025 7:07 PM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

I urge you to:

- Reject Pacifica's SSRA policy as currently drafted;
- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
- Require meaningful, site-based mitigation for any shoreline protection proposal;
- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,
Mila Bekele
161 N 11th St San Jose, CA 95112-3428
mandmbekele@gmail.com

Honey, Julian@Coastal

From: celine.antonette.sims@everyactioncustom.com on behalf of Celine Sims
<celine.antonette.sims@everyactioncustom.com>
Sent: Thursday, May 1, 2025 6:57 PM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

Dear California Coastal Commission Staff,

My name is Celine Sims and I am 11 years old. I've always loved visiting beaches and oceans. I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

I urge you to:

- Reject Pacifica's SSRA policy as currently drafted;
- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
- Require meaningful, site-based mitigation for any shoreline protection proposal;
- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,

Celine Sims

Member of Silicon Valley Youth Climate Change - San Jose Team

Sincerely,

Celine Sims

3972 Blue Gum Dr San Jose, CA 95127-2511 celine.antonette.sims@gmail.com

Honey, Julian@Coastal

From: noahhaydon@everyactioncustom.com on behalf of Noah Haydon
<noahhaydon@everyactioncustom.com>
Sent: Thursday, May 1, 2025 6:54 PM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

I urge you to:

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- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
- Require meaningful, site-based mitigation for any shoreline protection proposal;
- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,
Noah Haydon
405 91st St Daly City, CA 94015-1963
noahhaydon@gmail.com

Honey, Julian@Coastal

From: noahhaydon@everyactioncustom.com on behalf of Noah Haydon
<noahhaydon@everyactioncustom.com>
Sent: Thursday, May 1, 2025 6:48 PM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

I urge you to:

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- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
- Require meaningful, site-based mitigation for any shoreline protection proposal;
- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,
Noah Haydon
405 91st St Daly City, CA 94015-1963
noahhaydon@gmail.com

Honey, Julian@Coastal

From: shayla_and_bwd@everyactioncustom.com on behalf of shayla ramos
<shayla_and_bwd@everyactioncustom.com>
Sent: Thursday, May 1, 2025 6:39 PM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP
Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

I urge you to:

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- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
- Require meaningful, site-based mitigation for any shoreline protection proposal;
- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast economic dependance on tourism and future generations.

Sincerely,

shayla ramos

1661 Tiburon Dr Hollister, CA 95023-6222 shayla_and_bwd@yahoo.com

Honey, Julian@Coastal

From: Idostalhome@everyactioncustom.com on behalf of Lori Dostal
<Idostalhome@everyactioncustom.com>
Sent: Thursday, May 1, 2025 6:09 PM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

Please!!! I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

I urge you to:

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- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
- Require meaningful, site-based mitigation for any shoreline protection proposal;
- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.
Please save our natural lands.

Sincerely,
Lori Dostal
138 Creek Trl Redwood City, CA 94062-4605 Idostalhome@gmail.com

Honey, Julian@Coastal

From: alisruss@everyactioncustom.com on behalf of Alison Russell
<alisruss@everyactioncustom.com>
Sent: Thursday, May 1, 2025 5:50 PM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

I urge you to:

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- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
- Require meaningful, site-based mitigation for any shoreline protection proposal;
- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,

Alison Russell

548 Sumner St Santa Cruz, CA 95062-2533 alisruss@gmail.com

Honey, Julian@Coastal

From: tierno23@everyactioncustom.com on behalf of Kermit Cuff <tierno23@everyactioncustom.com>
Sent: Thursday, May 1, 2025 5:47 PM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

I urge you to:

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- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
- Require meaningful, site-based mitigation for any shoreline protection proposal;
- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,
Kermit Cuff

338 Mariposa Ave Apt 2 Mountain View, CA 94041-1160 tierno23@yahoo.com

Honey, Julian@Coastal

From: Terafreedman@everyactioncustom.com on behalf of Tera Freedman
<Terafreedman@everyactioncustom.com>
Sent: Thursday, May 1, 2025 5:23 PM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

Dear California Coastal Commission

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

I urge you to:

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- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
- Require meaningful, site-based mitigation for any shoreline protection proposal;
- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Thank you, Tera Freedman

Sincerely,

Tera Freedman

1118 Munich St San Francisco, CA 94112-4423 Terafreedman@gmail.com

Honey, Julian@Coastal

From: judgemoo@everyactioncustom.com on behalf of Charlene Henley
<judgemoo@everyactioncustom.com>
Sent: Thursday, May 1, 2025 5:18 PM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

I urge you to:

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Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,

Charlene Henley

5275 Country Oak Ct San Jose, CA 95136-3608 judgemoo@aol.com

Honey, Julian@Coastal

From: khschilling@everyactioncustom.com on behalf of Karl Schilling
<khschilling@everyactioncustom.com>
Sent: Thursday, May 1, 2025 5:15 PM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

I urge you to:

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- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
- Require meaningful, site-based mitigation for any shoreline protection proposal;
- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,

Karl Schilling

743 Schoolhouse Rd San Jose, CA 95138-1314 khschilling@sbcglobal.net

Honey, Julian@Coastal

From: mrpicasso2@everyactioncustom.com on behalf of Mike Beggs <mrpicasso2@everyactioncustom.com>
Sent: Thursday, May 1, 2025 5:10 PM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

Please reject the current draft of the City of Pacifica's Land Use Local Coastal Plan. That plan includes the new land designation of "Special Shoreline Resiliency Areas." which puts our beaches at risk by relying on seawalls. Seawalls actively contribute to beach loss.

Please

- Reject Pacifica's SSRA policy as currently drafted;
- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
- Require meaningful, site-based mitigation for any shoreline protection proposal;
- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Thank you

Sincerely,
Mike Beggs
110 E Younger Ave San Jose, CA 95112-4947 mrpicasso2@gmail.com

Honey, Julian@Coastal

From: ishka@everyactioncustom.com on behalf of Kate Ashley
<ishka@everyactioncustom.com>
Sent: Thursday, May 1, 2025 5:09 PM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

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- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
- Require meaningful, site-based mitigation for any shoreline protection proposal;
- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Thank you.

Sincerely,
Kate Ashley
2673 Carolina Ave Redwood City, CA 94061-3242 ishka@earthlink.net

Honey, Julian@Coastal

From: hmblisa650@everyactioncustom.com on behalf of Lisa Fernandez <hmblisa650@everyactioncustom.com>
Sent: Thursday, May 1, 2025 5:06 PM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

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I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

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- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,

Lisa Fernandez

280 Coral Reef Ave Half Moon Bay, CA 94019-4210 hmblisa650@gmail.com

Honey, Julian@Coastal

From: bluerock498@everyactioncustom.com on behalf of Deborah Taylor <bluerock498@everyactioncustom.com>
Sent: Thursday, May 1, 2025 5:02 PM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

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I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

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- Require meaningful, site-based mitigation for any shoreline protection proposal;
- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,
Deborah Taylor
75 S 17th St San Jose, CA 95112-2032
bluerock498@gmail.com

Honey, Julian@Coastal

From: daveolson@everyactioncustom.com on behalf of Dave Olson
<daveolson@everyactioncustom.com>
Sent: Thursday, May 1, 2025 4:57 PM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss. This is confirmed as in issue in multiple areas along this coastline, as long as elsewhere in the world. They are short-term solutions, and cause worse problems downshore for beaches and other coastal formations.

I urge you to:

- Reject Pacifica's SSRA policy as currently drafted;
- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
- Require meaningful, site-based mitigation for any shoreline protection proposal;
- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,

Dave Olson

PO Box 1506 214 Sonora Ave El Granada, CA 94018-1506 daveolson@gmail.com

Honey, Julian@Coastal

From: amanair@everyactioncustom.com on behalf of April Anair
<amanair@everyactioncustom.com>
Sent: Thursday, May 1, 2025 4:40 PM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

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I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

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- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,

April Anair

14380 Debell Rd Los Altos Hills, CA 94022-2011 amanair@comcast.net

Honey, Julian@Coastal

From: sarita.talמידah@everyactioncustom.com on behalf of Linda Frankel
<sarita.talמידah@everyactioncustom.com>
Sent: Thursday, May 1, 2025 4:30 PM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

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I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

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- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,

Linda Frankel

11 Edgemoor Rd Kensington, CA 94707-1412 sarita.talמידah@yahoo.com

Honey, Julian@Coastal

From: jeans_mp@everyactioncustom.com on behalf of Jean Covell
<jeans_mp@everyactioncustom.com>
Sent: Thursday, May 1, 2025 4:25 PM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

I urge you to:

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Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,
Jean Covell

1160 Cloud Ave Menlo Park, CA 94025-6006 jeans_mp@yahoo.com

Honey, Julian@Coastal

From: pklein95014@everyactioncustom.com on behalf of Peter Klein <pklein95014@everyactioncustom.com>
Sent: Thursday, May 1, 2025 4:14 PM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

I urge you to:

- Reject Pacifica's SSRA policy as currently drafted;
- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
- Require meaningful, site-based mitigation for any shoreline protection proposal;
- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,

Peter Klein

10450 N Portal Ave Cupertino, CA 95014-2325 pklein95014@hotmail.com

Honey, Julian@Coastal

From: carolejg@everyactioncustom.com on behalf of Carole Gonsalves
<carolejg@everyactioncustom.com>
Sent: Thursday, May 1, 2025 4:10 PM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

I urge you to:

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- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
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- Prioritize nature-based solutions and adaptive realignment of infrastructure.

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Sincerely,

Carole Gonsalves

1497 Los Rios Dr San Jose, CA 95120-4825 carolejg@mac.com

Honey, Julian@Coastal

From: guitarride@everyactioncustom.com on behalf of glen deardorff
<guitarride@everyactioncustom.com>
Sent: Thursday, May 1, 2025 4:09 PM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP
Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

I urge you to:

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- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
- Require meaningful, site-based mitigation for any shoreline protection proposal;
- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,
glen deardorff
18250 Crest Ave Castro Valley, CA 94546-2722 guitarride@gmail.com

Honey, Julian@Coastal

From: hef5683@everyactioncustom.com on behalf of Heike Fischer <hef5683@everyactioncustom.com>
Sent: Thursday, May 1, 2025 3:39 PM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

Dear Coastal Commission,

I appreciate your efforts to preserve our coast for generations to come and also to avoid projects that will cause costly maintenance in the future.

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

I urge you to:

- Reject Pacifica's SSRA policy as currently drafted;
- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
- Require meaningful, site-based mitigation for any shoreline protection proposal;
- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,

Heike Fischer

120 Cowper St Palo Alto, CA 94301-1201

hef5683@yahoo.com

Honey, Julian@Coastal

From: cdloo@everyactioncustom.com on behalf of Christopher Loo
<cdloo@everyactioncustom.com>
Sent: Thursday, May 1, 2025 3:33 PM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

I urge you to:

- Reject Pacifica's SSRA policy as currently drafted;
- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
- Require meaningful, site-based mitigation for any shoreline protection proposal;
- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,
Christopher Loo
16920 Sorrel Way Morgan Hill, CA 95037-3864 cdloo@hotmail.com

Honey, Julian@Coastal

From: kkidguy@everyactioncustom.com on behalf of JAMES FEICHTL
<kkidguy@everyactioncustom.com>
Sent: Thursday, May 1, 2025 3:26 PM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

I urge you to:

- Reject Pacifica's SSRA policy as currently drafted;
- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
- Require meaningful, site-based mitigation for any shoreline protection proposal;
- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,
JAMES FEICHTL
2036 Lyon Ave Belmont, CA 94002-1637
kkidguy@gmail.com

Honey, Julian@Coastal

From: shanemwhitaker@everyactioncustom.com on behalf of Shane Whitaker
<shanemwhitaker@everyactioncustom.com>
Sent: Thursday, May 1, 2025 3:25 PM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

I am a resident of California and I am concerned about the precedent that could be set if the City of Pacifica's current draft of their Land Use Local Coastal Plan is approved. I urge you to reject this plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

I urge you to:

- Reject Pacifica's SSRA policy as currently drafted;
- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
- Require meaningful, site-based mitigation for any shoreline protection proposal;
- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,

Shane Whitaker

6416 Woodley Ave Van Nuys, CA 91406-6418 shanemwhitaker@gmail.com

Honey, Julian@Coastal

From: katheg@everyactioncustom.com on behalf of Kathleen Hegerhorst
<katheg@everyactioncustom.com>
Sent: Thursday, May 1, 2025 3:18 PM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP
Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

To the CA Coastal Commission:

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

I urge you to:

- Reject Pacifica's SSRA policy as currently drafted;
- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
- Require meaningful, site-based mitigation for any shoreline protection proposal;
- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,
Kathleen Hegerhorst

Sincerely,
Kathleen Hegerhorst
2438 44th Ave San Francisco, CA 94116-2061 katheg@att.net

Honey, Julian@Coastal

From: lizhenry@everyactioncustom.com on behalf of Elizabeth Gioumouis
<lizhenry@everyactioncustom.com>
Sent: Thursday, May 1, 2025 3:09 PM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP
Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

I urge you to:

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- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
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- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,

Elizabeth Gioumouis

1145 W Mc Kinley Ave Sunnyvale, CA 94086-7016 lizhenry@yahoo.com

Honey, Julian@Coastal

From: cornblossom@everyactioncustom.com on behalf of Linda Johnson
<cornblossom@everyactioncustom.com>
Sent: Thursday, May 1, 2025 3:09 PM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

I urge you to:

- Reject Pacifica's SSRA policy as currently drafted;
- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
- Require meaningful, site-based mitigation for any shoreline protection proposal;
- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,

Linda Johnson

2340 Carol Ave Mountain View, CA 94040-3813 cornblossom@gmail.com

Honey, Julian@Coastal

From: rsantos@everyactioncustom.com on behalf of Richard Santos
<rsantos@everyactioncustom.com>
Sent: Thursday, May 1, 2025 3:07 PM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

I urge you to:

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- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
- Require meaningful, site-based mitigation for any shoreline protection proposal;
- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,

Richard Santos

5750 Almaden Expy San Jose, CA 95118-3614 rsantos@valleywater.org

Honey, Julian@Coastal

From: grenardmarkhayduke@everyactioncustom.com on behalf of Mark Hayduke Grenard
<grenardmarkhayduke@everyactioncustom.com>
Sent: Thursday, May 1, 2025 2:50 PM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP
Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

I urge you to:

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Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,

Mark Hayduke Grenard

4222 E Windrose Dr Apt 2009 Phoenix, AZ 85032-7562 grenardmarkhayduke@yahoo.com

Honey, Julian@Coastal

From: tpressburger@everyactioncustom.com on behalf of Thomas Pressburger
<tpressburger@everyactioncustom.com>
Sent: Thursday, May 1, 2025 2:49 PM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP
Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

We shouldn't necessitate sea walls because of building close to the shore in the first place, it's not safe.

I urge you to:

- Reject Pacifica's SSRA policy as currently drafted;
- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
- Require meaningful, site-based mitigation for any shoreline protection proposal;
- Prioritize nature-based solutions and adaptive realignment of infrastructure.

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Sincerely,

Thomas Pressburger

3789 Farm Hill Blvd Redwood City, CA 94061-1820 tpressburger@gmail.com

Honey, Julian@Coastal

From: dlardie@everyactioncustom.com on behalf of deborah lardie
<dlardie@everyactioncustom.com>
Sent: Thursday, May 1, 2025 2:45 PM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

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Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,
deborah lardie
705 George St Montara, CA 94037
dlardie@dlardie.com

Honey, Julian@Coastal

From: webb_28622@everyactioncustom.com on behalf of Arthur Webb <webb_28622@everyactioncustom.com>
Sent: Thursday, May 1, 2025 2:45 PM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

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Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,
Arthur Webb
1393 3rd St Gilroy, CA 95020-4753
webb_28622@msn.com

Honey, Julian@Coastal

From: rlc1999@everyactioncustom.com on behalf of Robert Chavez <rlc1999@everyactioncustom.com>
Sent: Thursday, May 1, 2025 2:44 PM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

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- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,

Robert Chavez

1200 Manning Ct San Martin, CA 95046-9711 rlc1999@yahoo.com

Honey, Julian@Coastal

From: grenardmarkhayduke@everyactioncustom.com on behalf of Mark Hayduke Grenard
<grenardmarkhayduke@everyactioncustom.com>
Sent: Thursday, May 1, 2025 2:36 PM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP
Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

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- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
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Sincerely,

Mark Hayduke Grenard

4222 E Windrose Dr Apt 2009 Phoenix, AZ 85032-7562 grenardmarkhayduke@yahoo.com

Honey, Julian@Coastal

From: bkengland@everyactioncustom.com on behalf of Bruce England
<bkengland@everyactioncustom.com>
Sent: Thursday, May 1, 2025 2:34 PM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP
Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

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- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,

Bruce England

328 Whisman Station Dr Mountain View, CA 94043-5255 bkengland@gmail.com

Honey, Julian@Coastal

From: jbenioff@everyactioncustom.com on behalf of Jeanne Benioff
<jbenioff@everyactioncustom.com>
Sent: Thursday, May 1, 2025 2:28 PM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

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- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
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Sincerely,

Jeanne Benioff

765 Upland Rd Redwood City, CA 94062-3042 jbenioff@comcast.net

Honey, Julian@Coastal

From: christinepielenz@everyactioncustom.com on behalf of Christine Pielenz
<christinepielenz@everyactioncustom.com>
Sent: Thursday, May 1, 2025 2:19 PM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP
Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

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- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
- Require meaningful, site-based mitigation for any shoreline protection proposal;
- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,

Christine Pielenz

1045 Tunitas Creek Rd Half Moon Bay, CA 94019-6201 christinepielenz@icloud.com

Honey, Julian@Coastal

From: genamccarthy3@everyactioncustom.com on behalf of Gena McCarthy <genamccarthy3@everyactioncustom.com>
Sent: Thursday, May 1, 2025 2:02 PM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

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- Reject Pacifica's SSRA policy as currently drafted;
- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
- Require meaningful, site-based mitigation for any shoreline protection proposal;
- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,

Gena McCarthy

1773 Tulare Ave Richmond, CA 94805-1522 genamccarthy3@gmail.com

Honey, Julian@Coastal

From: kate.malmgren@everyactioncustom.com on behalf of Kate Malmgren
<kate.malmgren@everyactioncustom.com>
Sent: Thursday, May 1, 2025 1:55 PM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP
Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

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Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,
Kate Malmgren
3265 Auburn Dr Redding, CA 96001-3490
kate.malmgren@gmail.com

Honey, Julian@Coastal

From: mamasquirrel89@everyactioncustom.com on behalf of angel h <mamasquirrel89@everyactioncustom.com>
Sent: Thursday, May 1, 2025 1:51 PM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

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Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,

angel h

20791 Garden Gate Dr Cupertino, CA 95014-1807 mamasquirrel89@gmail.com

Honey, Julian@Coastal

From: cashah0122@everyactioncustom.com on behalf of Claudia Shah <cashah0122@everyactioncustom.com>
Sent: Thursday, May 1, 2025 1:38 PM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

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- Require meaningful, site-based mitigation for any shoreline protection proposal;
- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,

Claudia Shah

3005 Ridgeway Dr San Jose, CA 95133-1459 cashah0122@yahoo.com

Honey, Julian@Coastal

From: pmdlass@everyactioncustom.com on behalf of Catherine Wolfe
<pmdlass@everyactioncustom.com>
Sent: Thursday, May 1, 2025 1:38 PM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

I urge you to:

- Reject Pacifica's SSRA policy as currently drafted;
- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
- Require meaningful, site-based mitigation for any shoreline protection proposal;
- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,

Catherine Wolfe

6111 San Ignacio Ave San Jose, CA 95119-1389 pmdlass@yahoo.com

Honey, Julian@Coastal

From: kuti3058@everyactioncustom.com on behalf of Michael Kutilek <kuti3058@everyactioncustom.com>
Sent: Thursday, May 1, 2025 1:18 PM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

I urge you to:

- Reject Pacifica's SSRA policy as currently drafted;
- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
- Require meaningful, site-based mitigation for any shoreline protection proposal;
- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,
Michael Kutilek
601 S 15th St San Jose, CA 95112-2368
kuti3058@sbcglobal.net

Honey, Julian@Coastal

From: jyoony1221@everyactioncustom.com on behalf of Jinah Yoon <jyoony1221@everyactioncustom.com>
Sent: Thursday, May 1, 2025 1:18 PM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

I urge you to:

- Reject Pacifica's SSRA policy as currently drafted;
- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
- Require meaningful, site-based mitigation for any shoreline protection proposal;
- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,
Jinah Yoon
490 Verano Ct San Jose, CA 95111-3849
jyoony1221@yahoo.com

Honey, Julian@Coastal

From: jyoony1221@everyactioncustom.com on behalf of Jinah Yoon <jyoony1221@everyactioncustom.com>
Sent: Thursday, May 1, 2025 1:14 PM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

I urge you to:

- Reject Pacifica's SSRA policy as currently drafted;
- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
- Require meaningful, site-based mitigation for any shoreline protection proposal;
- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,
Jinah Yoon
490 Verano Ct San Jose, CA 95111-3849
jyoony1221@yahoo.com

Honey, Julian@Coastal

From: juliegroves111@everyactioncustom.com on behalf of Julie OT Groves <juliegroves111@everyactioncustom.com>
Sent: Thursday, May 1, 2025 12:58 PM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

I urge you to:

- Reject Pacifica's SSRA policy as currently drafted;
- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
- Require meaningful, site-based mitigation for any shoreline protection proposal;
- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,

Julie OT Groves

147 Vista Del Monte Los Gatos, CA 95030-6335 juliegroves111@gmail.com

Honey, Julian@Coastal

From: stephanieanneaustin@everyactioncustom.com on behalf of Stephanie Austin
<stephanieanneaustin@everyactioncustom.com>
Sent: Thursday, May 1, 2025 12:56 PM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

I urge you to:

- Reject Pacifica's SSRA policy as currently drafted;
- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
- Require meaningful, site-based mitigation for any shoreline protection proposal;
- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,

Stephanie Austin

2456 Austin Pl CA95050 Santa Clara, CA 95050-5513 stephanieanneaustin@gmail.com

Honey, Julian@Coastal

From: fiorettajohn@everyactioncustom.com on behalf of John Fioretta
<fiorettajohn@everyactioncustom.com>
Sent: Thursday, May 1, 2025 12:46 PM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP
Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

I urge you to:

- Reject Pacifica's SSRA policy as currently drafted;
- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
- Require meaningful, site-based mitigation for any shoreline protection proposal;
- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,
John Fioretta
195 Arroyo Way San Jose, CA 95112-2102
fiorettajohn@gmail.com

Honey, Julian@Coastal

From: deniz_b@everyactioncustom.com on behalf of deniz bolbol
<deniz_b@everyactioncustom.com>
Sent: Thursday, May 1, 2025 12:45 PM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

I urge you to:

- Reject Pacifica's SSRA policy as currently drafted;
- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
- Require meaningful, site-based mitigation for any shoreline protection proposal;
- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,
deniz bolbol

205 De Anza Blvd # 125 San Mateo, CA 94402-3989 deniz_b@yahoo.com

Honey, Julian@Coastal

From: audreyrust@everyactioncustom.com on behalf of Audrey C Rust
<audreyrust@everyactioncustom.com>
Sent: Thursday, May 1, 2025 12:43 PM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP
Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

I urge you to:

- Reject Pacifica's SSRA policy as currently drafted;
- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
- Require meaningful, site-based mitigation for any shoreline protection proposal;
- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,
Audrey C Rust
601 S 15th St San Jose, CA 95112-2368
audreyrust@gmail.com

Honey, Julian@Coastal

From: smariedesigns@everyactioncustom.com on behalf of Suzanne Stanco
<smariedesigns@everyactioncustom.com>
Sent: Thursday, May 1, 2025 12:38 PM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP
Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

I urge you to:

- Reject Pacifica's SSRA policy as currently drafted;
- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
- Require meaningful, site-based mitigation for any shoreline protection proposal;
- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,

Suzanne Stanco

312 Viscaino Way San Jose, CA 95119-1630 smariedesigns@yahoo.com

Honey, Julian@Coastal

From: david@everyactioncustom.com on behalf of David Schrom
<david@everyactioncustom.com>
Sent: Thursday, May 1, 2025 12:38 PM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

I urge you to:

- Reject Pacifica's SSRA policy as currently drafted;
- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
- Require meaningful, site-based mitigation for any shoreline protection proposal;
- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,

David Schrom

381 Oxford Ave Palo Alto, CA 94306-1135 david@ecomagic.org

Honey, Julian@Coastal

From: tokdm@everyactioncustom.com on behalf of Kristin Mercer
<tokdm@everyactioncustom.com>
Sent: Thursday, May 1, 2025 12:37 PM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

Sea walls do NOT work, and it's disappointing that Pacifica is ignoring the science and the real-world experience of cities worldwide that irrefutably demonstrates this. Water always wins; walls only give a false sense of security. A far better investment is to buy-out at-risk properties and convert the shoreline to nature-based and adaptive solutions.

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan and proposal for seawalls. And since Pacifica is only the first of many, now is the time for the commission to clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine.

- Require meaningful, site-based mitigation for any shoreline protection proposal;
- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that provides long-term solutions, not a quick temporary and costly fix. Please stand up for a natural coastline for future generations.

Sincerely,
Kristin Mercer
2535 Somerset Dr Belmont, CA 94002-2925 tokdm@yahoo.com

Honey, Julian@Coastal

From: missjazzrocks@everyactioncustom.com on behalf of Karen Smith
<missjazzrocks@everyactioncustom.com>
Sent: Thursday, May 1, 2025 12:30 PM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

I urge you to:

- Reject Pacifica's SSRA policy as currently drafted;
- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
- Require meaningful, site-based mitigation for any shoreline protection proposal;
- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,

Karen Smith

287 N 3rd St Apt D San Jose, CA 95112-7224 missjazzrocks@comcast.net

Honey, Julian@Coastal

From: peteandcarla@everyactioncustom.com on behalf of Carla Holmes
<peteandcarla@everyactioncustom.com>
Sent: Thursday, May 1, 2025 12:21 PM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

I urge you to:

- Reject Pacifica's SSRA policy as currently drafted;
- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
- Require meaningful, site-based mitigation for any shoreline protection proposal;
- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,

Carla Holmes

750 Woodstock Ln Los Altos, CA 94022-3964 peteandcarla@sbcglobal.net

Honey, Julian@Coastal

From: cgdevry@everyactioncustom.com on behalf of Christopher DeVry
<cgdevry@everyactioncustom.com>
Sent: Thursday, May 1, 2025 12:20 PM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP
Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

I urge you to:

- Reject Pacifica's SSRA policy as currently drafted;
- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
- Require meaningful, site-based mitigation for any shoreline protection proposal;
- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,
Christopher DeVry
602 Francisco St El Granada, CA 94018-8025 cgdevry@gmail.com

Honey, Julian@Coastal

From: nancyedmonson@everyactioncustom.com on behalf of Nancy Edmonson
<nancyedmonson@everyactioncustom.com>
Sent: Thursday, May 1, 2025 12:07 PM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP
Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

I urge you to:

- Reject Pacifica's SSRA policy as currently drafted;
- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
- Require meaningful, site-based mitigation for any shoreline protection proposal;
- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,

Nancy Edmonson

555 John Muir Dr Apt 606 San Francisco, CA 94132-1053 nancyedmonson@earthlink.net

Honey, Julian@Coastal

From: vkojola@everyactioncustom.com on behalf of Victoia Kojola
<vkojola@everyactioncustom.com>
Sent: Thursday, May 1, 2025 12:05 PM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

I urge you to:

- Reject Pacifica's SSRA policy as currently drafted;
- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
- Require meaningful, site-based mitigation for any shoreline protection proposal;
- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,

Victoia Kojola

23500 Cristo Rey Dr Unit 522F Cupertino, CA 95014-6537 vkojola@comcast.net

Honey, Julian@Coastal

From: allenlein@everyactioncustom.com on behalf of Allen Leinwand
<allenlein@everyactioncustom.com>
Sent: Thursday, May 1, 2025 12:04 PM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP
Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

Please reject Pacifica's proposed SSRAs, and clarify that neighborhood-scale seawalls are not permissible under the Coastal Act and do not protect our beaches and coastlines.

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

I urge you to:

- Reject Pacifica's SSRA policy as currently drafted;
- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
- Require meaningful, site-based mitigation for any shoreline protection proposal;
- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,

Allen Leinwand

2086 Casa Mia Dr San Jose, CA 95124-2037 allenlein@aol.com

Honey, Julian@Coastal

From: bcleve02@everyactioncustom.com on behalf of Blyss Cleveland <bcleve02@everyactioncustom.com>
Sent: Friday, May 2, 2025 11:04 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

I urge you to read up on best practices for science-based planning for sea level rise (e.g., <https://law.stanford.edu/wp-content/uploads/2015/07/CalCoastArmor-FULL-REPORT-6.17.15.pdf>); clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine; require meaningful, site-based mitigation for any shoreline protection proposal; and prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,
Blyss Cleveland
14 Comstock Cir Stanford, CA 94305-7657 bcleve02@stanford.edu

Honey, Julian@Coastal

From: batul.haider.raja@everyactioncustom.com on behalf of Batul Raja
<batul.haider.raja@everyactioncustom.com>
Sent: Friday, May 2, 2025 11:00 AM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

I urge you to:

- Reject Pacifica's SSRA policy as currently drafted;
- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
- Require meaningful, site-based mitigation for any shoreline protection proposal;
- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,
Batul Raja
38519 Jones Way Fremont, CA 94536-4425
batul.haider.raja@gmail.com

Honey, Julian@Coastal

From: Travis, Galen@Coastal
Sent: Friday, May 2, 2025 10:26 AM
To: Honey, Julian@Coastal
Subject: FW: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

-----Original Message-----

From: margaret@everyactioncustom.com <margaret@everyactioncustom.com>
Sent: Thursday, May 1, 2025 1:06 PM
To: NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

You could do worse, but come on - sea walls in this day and age when we definitely know better - please take a stand against this proposal. Our kids and grandkids and their kids and grandkids should be able to enjoy a natural and moving shoreline.

Thank you.

Margaret MacNiven

Sincerely,

Margaret MacNiven

22400 Skyline Blvd La Honda, CA 94020-9731 margaret@buckswoodside.com

Honey, Julian@Coastal

From: Travis, Galen@Coastal
Sent: Friday, May 2, 2025 10:25 AM
To: Honey, Julian@Coastal
Subject: FW: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update).

From: Joseph P. Becker <joebeck408@gmail.com>
Sent: Thursday, May 1, 2025 11:44 AM
To: NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update).

Dear Coastal Commissioners,

I urge you to reject the City of Pacifica's draft Land Use Local Coastal Program (LCLUP), particularly the proposed "Special Shoreline Resiliency Areas" (SSRA) designation. This policy threatens public access to our beaches, undermines coastal conservation, and encourages a piecemeal approach to shoreline armoring that contradicts the principles of the Coastal Act and the Public Trust Doctrine.

Seawalls may appear to offer short-term protection for private property, but they come at a devastating cost to our shared coastal resources. These hard structures accelerate erosion, shrink beaches, and ultimately destroy the very shoreline that belongs to everyone. The SSRA policy fragments coastal decision-making and prioritizes individual interests over collaborative, science-based coastal management by allowing neighborhood-level shoreline alteration.

I respectfully urge you to:

- **Reject** the SSRA policy as currently drafted.
- **Affirm** that ad hoc, neighborhood-scale seawalls are inconsistent with the Coastal Act and Public Trust protections;
- **Require** robust, site-specific mitigation for any proposed shoreline armoring;
- **Promote** nature-based solutions and strategic infrastructure realignment that protect public access and coastal ecosystems.

Our coast is a public treasure, not a private buffer. Please uphold the right of all people to access and enjoy California's beaches—now and for generations to come.

Sincerely,
Joseph Becker

Honey, Julian@Coastal

From: Travis, Galen@Coastal
Sent: Friday, May 2, 2025 10:25 AM
To: Honey, Julian@Coastal
Subject: FW: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

-----Original Message-----

From: bill@everyactioncustom.com <bill@everyactioncustom.com>
Sent: Thursday, May 1, 2025 11:18 AM
To: NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

I urge you to:

- Reject Pacifica's SSRA policy as currently drafted;
- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
- Require meaningful, site-based mitigation for any shoreline protection proposal;
- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,
Bill Korbholz
640 Lakemead Way Emerald Hills, CA 94062-3921 bill@korby.com

Honey, Julian@Coastal

From: NorthCentralCoast@Coastal
Sent: Friday, May 2, 2025 10:25 AM
To: Honey, Julian@Coastal
Subject: FW: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

-----Original Message-----

From: ted10000@everyactioncustom.com <ted10000@everyactioncustom.com>
Sent: Thursday, May 1, 2025 10:50 AM
To: NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

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Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,

Ted Fishman

790 Villa Teresa Way San Jose, CA 95123-2639 ted10000@hotmail.com

Honey, Julian@Coastal

From: Travis, Galen@Coastal
Sent: Friday, May 2, 2025 10:25 AM
To: Honey, Julian@Coastal
Subject: FW: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

-----Original Message-----

From: melora.garrison@everyactioncustom.com <melora.garrison@everyactioncustom.com>
Sent: Thursday, May 1, 2025 10:24 AM
To: NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

I'm a lifelong California resident; I grew up in Moss Beach visiting beaches from Pacifica to Pescadero. I write to urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

As you know, the California Constitution and the Coastal Act guarantee the public's right to access California beaches. But seawalls eat away at beaches, causing them to shrink ever smaller until there's no space left for anyone to enjoy.

The Coastal Act requires that conflicts between private property rights and coastal conservation be resolved in a way that is "most protective of significant coastal resources." I wrote an article about these issues here:

<https://www.fodors.com/world/north-america/usa/california/experiences/news/californias-shrinking-beaches-the-battle-over-seawalls-and-public-access>

I urge you to:

- Reject Pacifica's SSRA policy as currently drafted;
- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
- Require meaningful, site-based mitigation for any shoreline protection proposal;
- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations. Thank you!

Sincerely,

Melora Garrison

23 Upper Cir Carmel Valley, CA 93924-9737 melora.garrison@gmail.com

Honey, Julian@Coastal

From: Travis, Galen@Coastal
Sent: Friday, May 2, 2025 10:24 AM
To: Honey, Julian@Coastal
Subject: FW: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

-----Original Message-----

From: vstork@everyactioncustom.com <vstork@everyactioncustom.com>
Sent: Thursday, May 1, 2025 9:27 AM
To: NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

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Sincerely,

Veronica Stork

20112 Panoche Rd # 215 Paicines, CA 95043 vstork@storkpeterkin.org

Honey, Julian@Coastal

From: Travis, Galen@Coastal
Sent: Friday, May 2, 2025 10:24 AM
To: Honey, Julian@Coastal
Subject: FW: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

-----Original Message-----

From: mary@everyactioncustom.com <mary@everyactioncustom.com>
Sent: Thursday, May 1, 2025 9:09 AM
To: NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

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Sincerely,
mary Paine

Sincerely,
Mary Paine
290 Mapache Dr Portola Valley, CA 94028-7318 mary@paineapacific.com

Honey, Julian@Coastal

From: Travis, Galen@Coastal
Sent: Friday, May 2, 2025 10:23 AM
To: Honey, Julian@Coastal
Subject: FW: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

-----Original Message-----

From: nicolerheslip@everyactioncustom.com <nicolerheslip@everyactioncustom.com>
Sent: Thursday, May 1, 2025 9:26 AM
To: NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

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Sincerely,

Nicole Heslip

200 Deer Hollow Rd San Anselmo, CA 94960-1245 nicolerheslip@gmail.com

Honey, Julian@Coastal

From: Travis, Galen@Coastal
Sent: Friday, May 2, 2025 10:23 AM
To: Honey, Julian@Coastal
Subject: FW: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

-----Original Message-----

From: mshabbott@everyactioncustom.com <mshabbott@everyactioncustom.com>
Sent: Thursday, May 1, 2025 8:47 AM
To: NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

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Sincerely,

Mary Shabbott

1822 Millcreek Dr Arkadelphia, AR 71923-3038 mshabbott@sbcglobal.net

Honey, Julian@Coastal

From: Travis, Galen@Coastal
Sent: Friday, May 2, 2025 10:03 AM
To: Honey, Julian@Coastal
Subject: FW: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

-----Original Message-----

From: mshabbott@everyactioncustom.com <mshabbott@everyactioncustom.com>
Sent: Thursday, May 1, 2025 8:47 AM
To: NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

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Sincerely,

Mary Shabbott

1822 Millcreek Dr Arkadelphia, AR 71923-3038 mshabbott@sbcglobal.net

Honey, Julian@Coastal

From: machado0568@everyactioncustom.com on behalf of Joseph Machado <machado0568@everyactioncustom.com>
Sent: Friday, May 2, 2025 8:23 PM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Dear Chair Cummings and Commissioners,

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Sincerely,

Joseph Machado

16685 Trail Dr Morgan Hill, CA 95037-3927 machado0568@sbcglobal.net

Honey, Julian@Coastal

From: ellenbh@everyactioncustom.com on behalf of Ellen Hall
<ellenbh@everyactioncustom.com>
Sent: Friday, May 2, 2025 7:59 PM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP
Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

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Sincerely,

Ellen Hall

1152 Encanto Way Pacifica, CA 94044-3343 ellenbh@sbcglobal.net

Honey, Julian@Coastal

From: ellenbh@everyactioncustom.com on behalf of Ellen Hall
<ellenbh@everyactioncustom.com>
Sent: Friday, May 2, 2025 7:57 PM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

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Sincerely,

Ellen Hall

1152 Encanto Way Pacifica, CA 94044-3343 ellenbh@sbcglobal.net

Honey, Julian@Coastal

From: patty4282@everyactioncustom.com on behalf of Patty Linder <patty4282@everyactioncustom.com>
Sent: Friday, May 2, 2025 6:30 PM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

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Sincerely,
Patty Linder
839 Bend Ave San Jose, CA 95136-1804
patty4282@gmail.com

Honey, Julian@Coastal

From: a_m_mason@everyactioncustom.com on behalf of Anne Mason
<a_m_mason@everyactioncustom.com>
Sent: Friday, May 2, 2025 5:31 PM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP
Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

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Sincerely,

Anne Mason

4250 El Camino Real Apt B216 Palo Alto, CA 94306-4467 a_m_mason@ieee.org

Honey, Julian@Coastal

From: thalia@everyactioncustom.com on behalf of thalia lubin
<thalia@everyactioncustom.com>
Sent: Friday, May 2, 2025 5:27 PM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

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Sincerely,
thalia lubin

11 Palm Circle Rd Woodside, CA 94062-4166 thalia@thaliaproductions.com

Honey, Julian@Coastal

From: Elliott Haught <civiciinput@newmode.io>
Sent: Monday, May 5, 2025 9:38 AM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

I urge you to reject the City of Pacifica's current draft of their Local Coastal Land Use Plan unless and until significant changes are made to bring the proposal into conformity with the Coastal Act. The plan's proposed Special Shoreline Resiliency Areas (SSRAs) would allow neighborhood-scale seawalls and redevelopment in hazardous, eroding areas—threatening public trust resources, undermining the Coastal Act's public access protections, and prioritizing private development over the public beach. This plan would permanently lock in beach erosion at Rockaway Beach and West Sharp Park and allow new development to rely on shoreline armoring in a high risk area.

Please revise the plan to ensure:

- Reject the SSRA policies that would allow new development and redevelopment to rely on large-scale seawalls. No new development can rely on seawalls for future protection.
- Shoreline armoring is minimized and only allowed where absolutely necessary and in conformance with Coastal Act Sections 30235 and 30253 (e.g., when designed to eliminate or mitigate adverse impacts on local shoreline sand supply).
- Public beach loss is fully mitigated with real, on-the-ground projects and conditions that create and restore beach and coastal habitat (e.g., removal of structures encroaching on public trust property)—not just fees, park benches and trails align the coast.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,

Elliott Haught
e.a.s.haught@gmail.com, 2187 48th Avenue, Oakland, CA, US, 94601

Honey, Julian@Coastal

From: Noreen Weeden <civicinput@newmode.io>
Sent: Sunday, May 4, 2025 4:21 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

I urge you to reject the City of Pacifica's current draft of their Local Coastal Land Use Plan unless and until significant changes are made to bring the proposal into conformity with the Coastal Act. The plan's proposed Special Shoreline Resiliency Areas (SSRAs) would allow neighborhood-scale seawalls and redevelopment in hazardous, eroding areas—threatening public trust resources, undermining the Coastal Act's public access protections, and prioritizing private development over the public beach. This plan would permanently lock in beach erosion at Rockaway Beach and West Sharp Park and allow new development to rely on shoreline armoring in a high risk area.

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Sincerely,

Noreen Weeden
noreen@naturetrip.com, 493 Vermont St, San Francisco, CA, US, 94107

Honey, Julian@Coastal

From: Lynn Adams <civicinput@newmode.io>
Sent: Sunday, May 4, 2025 12:15 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

I urge you to reject the City of Pacifica's current draft of their Local Coastal Land Use Plan unless and until significant changes are made to bring the proposal into conformity with the Coastal Act. The plan's proposed Special Shoreline Resiliency Areas (SSRAs) would allow neighborhood-scale seawalls and redevelopment in hazardous, eroding areas—threatening public trust resources, undermining the Coastal Act's public access protections, and prioritizing private development over the public beach. This plan would permanently lock in beach erosion at Rockaway Beach and West Sharp Park and allow new development to rely on shoreline armoring in a high risk area.

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Sincerely,

Lynn Adams
lynn@pacificbeachcoalition.org, 601 Beaumont Boulevard, Pacifica, CA, US, 94044

Honey, Julian@Coastal

From: Joanne Gold <civinput@newmode.io>
Sent: Sunday, May 4, 2025 9:56 AM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

I urge you to reject the City of Pacifica's current draft of their Local Coastal Land Use Plan unless and until significant changes are made to bring the proposal into conformity with the Coastal Act. The plan's proposed Special Shoreline Resiliency Areas (SSRAs) would allow neighborhood-scale seawalls and redevelopment in hazardous, eroding areas—threatening public trust resources, undermining the Coastal Act's public access protections, and prioritizing private development over the public beach. This plan would permanently lock in beach erosion at Rockaway Beach and West Sharp Park and allow new development to rely on shoreline armoring in a high risk area.

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Sincerely,

Joanne Gold
joannegold@yahoo.com, 251 Stanley Ave., Pacifica , PR, US, 94044

Honey, Julian@Coastal

From: Jennifer Pantaleon <civinput@newmode.io>
Sent: Saturday, May 3, 2025 11:07 AM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

I urge you to reject the City of Pacifica's current draft of their Local Coastal Land Use Plan unless and until significant changes are made to bring the proposal into conformity with the Coastal Act. The plan's proposed Special Shoreline Resiliency Areas (SSRAs) would allow neighborhood-scale seawalls and redevelopment in hazardous, eroding areas—threatening public trust resources, undermining the Coastal Act's public access protections, and prioritizing private development over the public beach. This plan would permanently lock in beach erosion at Rockaway Beach and West Sharp Park and allow new development to rely on shoreline armoring in a high risk area.

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Sincerely,

Jennifer Pantaleon
jetphire@aol.com, 153 MONTECITO AVE, PACIFICA, CA, US, 94044-2757

Honey, Julian@Coastal

From: MARCIA Settel <civiciinput@newmode.io>
Sent: Saturday, May 3, 2025 11:01 AM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

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- Public beach loss is fully mitigated with real, on-the-ground projects and conditions that create and restore beach and coastal habitat (e.g., removal of structures encroaching on public trust property)—not just fees, park benches and trails align the coast.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,

MARCIA Settel
gilset1158@gmail.com, 189 Olympian Way, Pacifica, CA, US, 94044

Honey, Julian@Coastal

From: twarren200@everyactioncustom.com on behalf of Theresa Warren <twarren200@everyactioncustom.com>
Sent: Friday, May 2, 2025 4:08 PM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Chair Cummings and Commissioners,

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

I urge you to:

- Reject Pacifica's SSRA policy as currently drafted;
- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
- Require meaningful, site-based mitigation for any shoreline protection proposal;
- Prioritize nature-based solutions and adaptive realignment of infrastructure.

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Sincerely,

Theresa Warren

2495 Huston Ct Morgan Hill, CA 95037-3920 twarren200@yahoo.com

Honey, Julian@Coastal

From: allicat@everyactioncustom.com on behalf of Allison Brodeur
<allicat@everyactioncustom.com>
Sent: Friday, May 2, 2025 4:44 PM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP
Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Chair Cummings and Commissioners,

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- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
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- Prioritize nature-based solutions and adaptive realignment of infrastructure.

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Sincerely,
Allison Brodeur
217 Loma Dr Salinas, CA 93906-3311
allicat@gmail.com

Honey, Julian@Coastal

From: christovonhahn1@everyactioncustom.com on behalf of kristoph von Hahn
<christovonhahn1@everyactioncustom.com>
Sent: Friday, May 2, 2025 4:51 PM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP
Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Chair Cummings and Commissioners,

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

I urge you to:

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- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
- Require meaningful, site-based mitigation for any shoreline protection proposal;
- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,

kristoph von Hahn

3190 Pleasant Valley Rd Aptos, CA 95003-9570 christovonhahn1@gmail.com

Honey, Julian@Coastal

From: wendylama@everyactioncustom.com on behalf of Wendy Lama
<wendylama@everyactioncustom.com>
Sent: Friday, May 2, 2025 1:22 PM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP
Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Chair Cummings and Commissioners,

I urge you to reject the City of Pacifica's current draft Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." Approval of the Plan would allow the construction of seawalls setting a very bad precedent up and down the coast. It is well documented that seawalls accelerate beach erosion and actively contribute to beach loss.

As a previous Coastal Commission Analyst who worked on the City of Pacifica LCP decades ago, I know well that seawalls are not permissible under the Coastal Act. By approving this LULCP, the Commission would be opening the door to countless local governments proposing seawalls as a short-sighted remedy to coastal erosion. This would set a seriously dangerous precedent and would be an unlawful decision.

Instead, the Commission should require site-based mitigation for any shoreline protection proposal, and should prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Thank you, Sincerely, Wendy Brewer Lama, Half Moon Bay

Sincerely,
Wendy Lama
699 Spindrift Way Half Moon Bay, CA 94019-1543 wendylama@coastside.net

Honey, Julian@Coastal

From: susan.t.desjardin@everyactioncustom.com on behalf of Susan DesJardin
<susan.t.desjardin@everyactioncustom.com>
Sent: Friday, May 2, 2025 1:49 PM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Chair Cummings and Commissioners,

I urge you to reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

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- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
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- Prioritize nature-based solutions and adaptive realignment of infrastructure.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,
Susan DesJardin
188 Ramona Ave Pacifica, CA 94044-3044
susan.t.desjardin@gmail.com

Honey, Julian@Coastal

From: jscottpr@everyactioncustom.com on behalf of Joan Scott
<jscottpr@everyactioncustom.com>
Sent: Friday, May 2, 2025 1:49 PM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Follow Up Flag: Follow up
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- Prioritize nature-based solutions and adaptive realignment of infrastructure.

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Sincerely,

Joan Scott

120 Mira Way Portola Valley, CA 94028-7465 jscottpr@aol.com

Honey, Julian@Coastal

From: linda@everyactioncustom.com on behalf of Linda Elkind
<linda@everyactioncustom.com>
Sent: Friday, May 2, 2025 2:43 PM
To: NorthCentralCoast@Coastal
Subject: Public Comment on May 2025 Agenda Item Thursday 9a - City of Pacifica LCP Amendment Number LCP-2-PAC-23-0056-3 (City of Pacifica LUP Update)

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Chair Cummings and Commissioners,

I asking you to please reject the City of Pacifica's current draft of their Land Use Local Coastal Plan, which includes the new land designation of "Special Shoreline Resiliency Areas." This new land designation puts our beaches at risk, and relies on seawalls which actively contribute to beach loss.

I urge you to:

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- Clarify that neighborhood-scale seawalls are not permissible under the Coastal Act or Public Trust Doctrine;
- Require meaningful, site-based mitigation for any shoreline protection proposal;
- Prioritize nature-based solutions and adaptive realignment of infrastructure.

San Mateo coastal plan needs to protects its beaches and waves – and the public's right to access them. Please hold firm to the Coastal Plan and protect our beaches for future generations.

Sincerely,

Linda Elkind

620 Sand Hill Rd Apt 116F Palo Alto, CA 94304-2080 linda@elkind.org

Honey, Julian@Coastal

From: Margo Meiman <civicinput@newmode.io>
Sent: Thursday, May 1, 2025 9:48 AM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Chair Cummings & Commissioners,

I urge you to reject the City of Pacifica's current draft of their Local Coastal Land Use Plan unless and until significant changes are made to bring the proposal into conformity with the Coastal Act. The plan's proposed Special Shoreline Resiliency Areas (SSRAs) would allow neighborhood-scale seawalls and redevelopment in hazardous, eroding areas—threatening public trust resources, undermining the Coastal Act's public access protections, and prioritizing private development over the public beach. This plan would permanently lock in beach erosion at Rockaway Beach and West Sharp Park and allow new development to rely on shoreline armoring in a high risk area.

Please revise the plan to ensure:

- Reject the SSRA policies that would allow new development and redevelopment to rely on large-scale seawalls. No new development can rely on seawalls for future protection.
- Shoreline armoring is minimized and only allowed where absolutely necessary and in conformance with Coastal Act Sections 30235 and 30253 (e.g., when designed to eliminate or mitigate adverse impacts on local shoreline sand supply).
- Public beach loss is fully mitigated with real, on-the-ground projects and conditions that create and restore beach and coastal habitat (e.g., removal of structures encroaching on public trust property)—not just fees, park benches and trails align the coast.

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Sincerely,

Margo Meiman
ameiman@yahoo.com, 377 Olympian Way, Pacifica, CA, US, 94044

Honey, Julian@Coastal

From: Elizabeth Ross <civicinput@newmode.io>
Sent: Wednesday, April 30, 2025 11:58 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

I urge you to reject the City of Pacifica's current draft of their Local Coastal Land Use Plan unless and until significant changes are made to bring the proposal into conformity with the Coastal Act. The plan's proposed Special Shoreline Resiliency Areas (SSRAs) would allow neighborhood-scale seawalls and redevelopment in hazardous, eroding areas—threatening public trust resources, undermining the Coastal Act's public access protections, and prioritizing private development over the public beach. This plan would permanently lock in beach erosion at Rockaway Beach and West Sharp Park and allow new development to rely on shoreline armoring in a high risk area.

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Sincerely,

Elizabeth Ross
eross2@sbcglobal.net, 52 Santa Maria Avenue, Pacifica, CA, US, 94044

Honey, Julian@Coastal

From: Karen Gorman <civiciinput@newmode.io>
Sent: Wednesday, April 30, 2025 10:55 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

I urge you to reject the City of Pacifica's current draft of their Local Coastal Land Use Plan unless and until significant changes are made to bring the proposal into conformity with the Coastal Act. The plan's proposed Special Shoreline Resiliency Areas (SSRAs) would allow neighborhood-scale seawalls and redevelopment in hazardous, eroding areas—threatening public trust resources, undermining the Coastal Act's public access protections, and prioritizing private development over the public beach. This plan would permanently lock in beach erosion at Rockaway Beach and West Sharp Park and allow new development to rely on shoreline armoring in a high risk area.

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Sincerely,

Karen Gorman
KGorman270@gmail.com, 351 Sixth St, Montara , PR, US, 94037

Honey, Julian@Coastal

From: Susan Herring <civicinput@newmode.io>
Sent: Wednesday, April 30, 2025 10:23 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

I urge you to reject the City of Pacifica's current draft of their Local Coastal Land Use Plan unless and until significant changes are made to bring the proposal into conformity with the Coastal Act. The plan's proposed Special Shoreline Resiliency Areas (SSRAs) would allow neighborhood-scale seawalls and redevelopment in hazardous, eroding areas—threatening public trust resources, undermining the Coastal Act's public access protections, and prioritizing private development over the public beach. This plan would permanently lock in beach erosion at Rockaway Beach and West Sharp Park and allow new development to rely on shoreline armoring in a high risk area.

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Sincerely,

Susan Herring
susang7@earthlink.net, 1404 Perez Dr. , Pacifica, PR, US, 94044

Honey, Julian@Coastal

From: Margaret Ann Cooney <civicinput@newmode.io>
Sent: Wednesday, April 30, 2025 7:54 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

I urge you to reject the City of Pacifica's current draft of their Local Coastal Land Use Plan unless and until significant changes are made to bring the proposal into conformity with the Coastal Act. The plan's proposed Special Shoreline Resiliency Areas (SSRAs) would allow neighborhood-scale seawalls and redevelopment in hazardous, eroding areas—threatening public trust resources, undermining the Coastal Act's public access protections, and prioritizing private development over the public beach. This plan would permanently lock in beach erosion at Rockaway Beach and West Sharp Park and allow new development to rely on shoreline armoring in a high risk area.

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Sincerely,

Margaret Ann Cooney
ann_cooney@hotmail.com, 418 REINA DEL MAR AVE, Pacifica, CA, US, 94044

Honey, Julian@Coastal

From: Thomas Edminster <civinput@newmode.io>
Sent: Wednesday, April 30, 2025 5:15 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

I urge you to reject the City of Pacifica's current draft of their Local Coastal Land Use Plan unless and until significant changes are made to bring the proposal into conformity with the Coastal Act. The plan's proposed Special Shoreline Resiliency Areas (SSRAs) would allow neighborhood-scale seawalls and redevelopment in hazardous, eroding areas—threatening public trust resources, undermining the Coastal Act's public access protections, and prioritizing private development over the public beach. This plan would permanently lock in beach erosion at Rockaway Beach and West Sharp Park and allow new development to rely on shoreline armoring in a high risk area.

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Sincerely,

Thomas Edminster
tedminster@gmail.com, 1026 Fassler Avenue, Pacifica, CA, US, 94044

Honey, Julian@Coastal

From: Katherine Tsai <civicinput@newmode.io>
Sent: Wednesday, April 30, 2025 3:49 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

I urge you to reject the City of Pacifica's current draft of their Local Coastal Land Use Plan unless and until significant changes are made to bring the proposal into conformity with the Coastal Act. The plan's proposed Special Shoreline Resiliency Areas (SSRAs) would allow neighborhood-scale seawalls and redevelopment in hazardous, eroding areas—threatening public trust resources, undermining the Coastal Act's public access protections, and prioritizing private development over the public beach. This plan would permanently lock in beach erosion at Rockaway Beach and West Sharp Park and allow new development to rely on shoreline armoring in a high risk area.

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Sincerely,

Katherine Tsai
kattsai@gmail.com, 14341 Elva Avenue, Saratoga, CA, US, 95070

From: Dinah Verby <civicinput@newmode.io>
Sent: Wednesday, April 30, 2025 2:44 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

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Sincerely,

Dinah Verby
dinahv@me.com, 338 Reichling Avenue, Pacifica, CA, US, 94044

Honey, Julian@Coastal

From: Cherie Chan <civiciinput@newmode.io>
Sent: Wednesday, April 30, 2025 2:26 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

I urge you to reject the City of Pacifica's current draft of their Local Coastal Land Use Plan unless and until significant changes are made to bring the proposal into conformity with the Coastal Act. The plan's proposed Special Shoreline Resiliency Areas (SSRAs) would allow neighborhood-scale seawalls and redevelopment in hazardous, eroding areas—threatening public trust resources, undermining the Coastal Act's public access protections, and prioritizing private development over the public beach. This plan would permanently lock in beach erosion at Rockaway Beach and West Sharp Park and allow new development to rely on shoreline armoring in a high risk area.

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Sincerely,

Cherie Chan
chan.cherie@gmail.com, 324 San Pedro Avenue, Pacifica, CA, US, 94044

Honey, Julian@Coastal

From: Cindy Abbott <civicinput@newmode.io>
Sent: Wednesday, April 30, 2025 2:16 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

I urge you to reject the City of Pacifica's current draft of their Local Coastal Land Use Plan unless and until significant changes are made to bring the proposal into conformity with the Coastal Act. The plan's proposed Special Shoreline Resiliency Areas (SSRAs) would allow neighborhood-scale seawalls and redevelopment in hazardous, eroding areas—threatening public trust resources, undermining the Coastal Act's public access protections, and prioritizing private development over the public beach. This plan would permanently lock in beach erosion at Rockaway Beach and West Sharp Park and allow new development to rely on shoreline armoring in a high risk area.

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Sincerely,

Cindy Abbott
cala3319@gmail.com, 51 Salada Avenue, Pacifica, CA, US, 94044

Honey, Julian@Coastal

From: Peter Loeb <civicinput@newmode.io>
Sent: Wednesday, April 30, 2025 1:58 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

I urge you to reject the City of Pacifica's current draft of their Local Coastal Land Use Plan unless and until significant changes are made to bring the proposal into conformity with the Coastal Act. The plan's proposed Special Shoreline Resiliency Areas (SSRAs) would allow neighborhood-scale seawalls and redevelopment in hazardous, eroding areas—threatening public trust resources, undermining the Coastal Act's public access protections, and prioritizing private development over the public beach. This plan would permanently lock in beach erosion at Rockaway Beach and West Sharp Park and allow new development to rely on shoreline armoring in a high risk area.

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Sincerely,

Peter Loeb
peterloeb1@gmail.com, 411 Maitland Road, Pacifica, CA, US, 94044

Honey, Julian@Coastal

From: Rebecca Groves <civiciinput@newmode.io>
Sent: Wednesday, April 30, 2025 10:53 AM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

I urge you to reject the City of Pacifica's current draft of their Local Coastal Land Use Plan unless and until significant changes are made to bring the proposal into conformity with the Coastal Act. The plan's proposed Special Shoreline Resiliency Areas (SSRAs) would allow neighborhood-scale seawalls and redevelopment in hazardous, eroding areas—threatening public trust resources, undermining the Coastal Act's public access protections, and prioritizing private development over the public beach. This plan would permanently lock in beach erosion at Rockaway Beach and West Sharp Park and allow new development to rely on shoreline armoring in a high risk area.

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Sincerely,

Rebecca Groves
rebeccagroves@mac.com, 952 Minnesota St, San Francisco, CA, US, 94107

Honey, Julian@Coastal

From: Dorothy Ruggles Stern <civinput@newmode.io>
Sent: Wednesday, April 30, 2025 7:52 AM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

I urge you to reject the City of Pacifica's current draft of their Local Coastal Land Use Plan unless and until significant changes are made to bring the proposal into conformity with the Coastal Act. The plan's proposed Special Shoreline Resiliency Areas (SSRAs) would allow neighborhood-scale seawalls and redevelopment in hazardous, eroding areas—threatening public trust resources, undermining the Coastal Act's public access protections, and prioritizing private development over the public beach. This plan would permanently lock in beach erosion at Rockaway Beach and West Sharp Park and allow new development to rely on shoreline armoring in a high risk area.

Please revise the plan to ensure:

- Reject the SSRA policies that would allow new development and redevelopment to rely on large-scale seawalls. No new development can rely on seawalls for future protection.
- Shoreline armoring is minimized and only allowed where absolutely necessary and in conformance with Coastal Act Sections 30235 and 30253 (e.g., when designed to eliminate or mitigate adverse impacts on local shoreline sand supply).
- Public beach loss is fully mitigated with real, on-the-ground projects and conditions that create and restore beach and coastal habitat (e.g., removal of structures encroaching on public trust property)—not just fees, park benches and trails align the coast.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,

Dorothy Ruggles Stern
vicdotstern@aol.com, 148 Evelyn Way, San Francisco, CA, US, 94127

Honey, Julian@Coastal

From: Todd Keating <civicinput@newmode.io>
Sent: Wednesday, April 30, 2025 3:06 AM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

I urge you to reject the City of Pacifica's current draft of their Local Coastal Land Use Plan unless and until significant changes are made to bring the proposal into conformity with the Coastal Act. The plan's proposed Special Shoreline Resiliency Areas (SSRAs) would allow neighborhood-scale seawalls and redevelopment in hazardous, eroding areas—threatening public trust resources, undermining the Coastal Act's public access protections, and prioritizing private development over the public beach. This plan would permanently lock in beach erosion at Rockaway Beach and West Sharp Park and allow new development to rely on shoreline armoring in a high risk area.

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Sincerely,

Todd Keating
keatingtodd@gmail.com, 747 Elm Street, San Jose, CA, US, 95126

Honey, Julian@Coastal

From: Keith Wong <civiciinput@newmode.io>
Sent: Tuesday, April 29, 2025 8:42 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

I urge you to reject the City of Pacifica's current draft of their Local Coastal Land Use Plan unless and until significant changes are made to bring the proposal into conformity with the Coastal Act. The plan's proposed Special Shoreline Resiliency Areas (SSRAs) would allow neighborhood-scale seawalls and redevelopment in hazardous, eroding areas—threatening public trust resources, undermining the Coastal Act's public access protections, and prioritizing private development over the public beach. This plan would permanently lock in beach erosion at Rockaway Beach and West Sharp Park and allow new development to rely on shoreline armoring in a high risk area.

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Sincerely,

Keith Wong
writekeith@gmail.com, 700 Imperial Drive, Pacifica , CA, US, 94044

Honey, Julian@Coastal

From: Chris Seidensticker <civicinput@newmode.io>
Sent: Tuesday, April 29, 2025 6:14 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

I urge you to reject the City of Pacifica's current draft of their Local Coastal Land Use Plan unless and until significant changes are made to bring the proposal into conformity with the Coastal Act. The plan's proposed Special Shoreline Resiliency Areas (SSRAs) would allow neighborhood-scale seawalls and redevelopment in hazardous, eroding areas—threatening public trust resources, undermining the Coastal Act's public access protections, and prioritizing private development over the public beach. This plan would permanently lock in beach erosion at Rockaway Beach and West Sharp Park and allow new development to rely on shoreline armoring in a high risk area.

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Sincerely,

Chris Seidensticker
seidenc@yahoo.com, 735 Acacia Drive, Burlingame, CA, US, 94010

Honey, Julian@Coastal

From: nathan rodoni <civicinput@newmode.io>
Sent: Tuesday, April 29, 2025 5:17 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

I urge you to reject the City of Pacifica's current draft of their Local Coastal Land Use Plan unless and until significant changes are made to bring the proposal into conformity with the Coastal Act. The plan's proposed Special Shoreline Resiliency Areas (SSRAs) would allow neighborhood-scale seawalls and redevelopment in hazardous, eroding areas—threatening public trust resources, undermining the Coastal Act's public access protections, and prioritizing private development over the public beach. This plan would permanently lock in beach erosion at Rockaway Beach and West Sharp Park and allow new development to rely on shoreline armoring in a high risk area.

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Sincerely,

nathan rodoni
nathanrodoni@yahoo.com, 2540 Wright Avenue, Pinole, CA, US, 94564

Honey, Julian@Coastal

From: nathan rodoni <civicinput@newmode.io>
Sent: Tuesday, April 29, 2025 5:17 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

I urge you to reject the City of Pacifica's current draft of their Local Coastal Land Use Plan unless and until significant changes are made to bring the proposal into conformity with the Coastal Act. The plan's proposed Special Shoreline Resiliency Areas (SSRAs) would allow neighborhood-scale seawalls and redevelopment in hazardous, eroding areas—threatening public trust resources, undermining the Coastal Act's public access protections, and prioritizing private development over the public beach. This plan would permanently lock in beach erosion at Rockaway Beach and West Sharp Park and allow new development to rely on shoreline armoring in a high risk area.

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Sincerely,

nathan rodoni
nathanrodoni@yahoo.com, 2540 Wright Avenue, Pinole, CA, US, 94564

Honey, Julian@Coastal

From: beth gould <civicinput@newmode.io>
Sent: Tuesday, April 29, 2025 5:13 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

I urge you to reject the City of Pacifica's current draft of their Local Coastal Land Use Plan unless and until significant changes are made to bring the proposal into conformity with the Coastal Act. The plan's proposed Special Shoreline Resiliency Areas (SSRAs) would allow neighborhood-scale seawalls and redevelopment in hazardous, eroding areas—threatening public trust resources, undermining the Coastal Act's public access protections, and prioritizing private development over the public beach. This plan would permanently lock in beach erosion at Rockaway Beach and West Sharp Park and allow new development to rely on shoreline armoring in a high risk area.

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Sincerely,

beth gould
bgould1111@gmail.com, 1715 McAllister St, Apt 305, San Francisco, CA, US, 94115

Honey, Julian@Coastal

From: beth gould <civicinput@newmode.io>
Sent: Tuesday, April 29, 2025 5:13 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

I urge you to reject the City of Pacifica's current draft of their Local Coastal Land Use Plan unless and until significant changes are made to bring the proposal into conformity with the Coastal Act. The plan's proposed Special Shoreline Resiliency Areas (SSRAs) would allow neighborhood-scale seawalls and redevelopment in hazardous, eroding areas—threatening public trust resources, undermining the Coastal Act's public access protections, and prioritizing private development over the public beach. This plan would permanently lock in beach erosion at Rockaway Beach and West Sharp Park and allow new development to rely on shoreline armoring in a high risk area.

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Sincerely,

beth gould
bgould1111@gmail.com, 1715 McAllister St, Apt 305, San Francisco, CA, US, 94115

Honey, Julian@Coastal

From: Colin Morris <civicinput@newmode.io>
Sent: Tuesday, April 29, 2025 4:47 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

I urge you to reject the City of Pacifica's current draft of their Local Coastal Land Use Plan unless and until significant changes are made to bring the proposal into conformity with the Coastal Act. The plan's proposed Special Shoreline Resiliency Areas (SSRAs) would allow neighborhood-scale seawalls and redevelopment in hazardous, eroding areas—threatening public trust resources, undermining the Coastal Act's public access protections, and prioritizing private development over the public beach. This plan would permanently lock in beach erosion at Rockaway Beach and West Sharp Park and allow new development to rely on shoreline armoring in a high risk area.

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Sincerely,

Colin Morris
colinwmorris@yahoo.com, 202 Naomi Avenue, Pacifica, CA, US, 94044

Honey, Julian@Coastal

From: Sydney Harris <civicinput@newmode.io>
Sent: Tuesday, April 29, 2025 4:44 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

I urge you to reject the City of Pacifica's current draft of their Local Coastal Land Use Plan unless and until significant changes are made to bring the proposal into conformity with the Coastal Act. The plan's proposed Special Shoreline Resiliency Areas (SSRAs) would allow neighborhood-scale seawalls and redevelopment in hazardous, eroding areas—threatening public trust resources, undermining the Coastal Act's public access protections, and prioritizing private development over the public beach. This plan would permanently lock in beach erosion at Rockaway Beach and West Sharp Park and allow new development to rely on shoreline armoring in a high risk area.

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Sincerely,

Sydney Harris
sydharrisco@gmail.com, 360 Esplanade Avenue, Pacifica, CA, US, 94044

Honey, Julian@Coastal

From: Elise Hughes-Watkins <civiciinput@newmode.io>
Sent: Tuesday, April 29, 2025 3:21 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

I urge you to reject the City of Pacifica's current draft of their Local Coastal Land Use Plan unless and until significant changes are made to bring the proposal into conformity with the Coastal Act. The plan's proposed Special Shoreline Resiliency Areas (SSRAs) would allow neighborhood-scale seawalls and redevelopment in hazardous, eroding areas—threatening public trust resources, undermining the Coastal Act's public access protections, and prioritizing private development over the public beach. This plan would permanently lock in beach erosion at Rockaway Beach and West Sharp Park and allow new development to rely on shoreline armoring in a high risk area.

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Sincerely,

Elise Hughes-Watkins
ehugheswatkinsmd@gmail.com, 1028 Sanders Drive, Moraga, CA, US, 94556

Honey, Julian@Coastal

From: Annie Wang <civiciinput@newmode.io>
Sent: Tuesday, April 29, 2025 3:08 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

I urge you to reject the City of Pacifica's current draft of their Local Coastal Land Use Plan unless and until significant changes are made to bring the proposal into conformity with the Coastal Act. The plan's proposed Special Shoreline Resiliency Areas (SSRAs) would allow neighborhood-scale seawalls and redevelopment in hazardous, eroding areas—threatening public trust resources, undermining the Coastal Act's public access protections, and prioritizing private development over the public beach. This plan would permanently lock in beach erosion at Rockaway Beach and West Sharp Park and allow new development to rely on shoreline armoring in a high risk area.

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Sincerely,

Annie Wang
anniedlwang@gmail.com, 5710 Wells Lane, San Ramon, CA, US, 94582

Honey, Julian@Coastal

From: Kurt Loeffler <civicinput@newmode.io>
Sent: Tuesday, April 29, 2025 2:39 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

I urge you to reject the City of Pacifica's current draft of their Local Coastal Land Use Plan unless and until significant changes are made to bring the proposal into conformity with the Coastal Act. The plan's proposed Special Shoreline Resiliency Areas (SSRAs) would allow neighborhood-scale seawalls and redevelopment in hazardous, eroding areas—threatening public trust resources, undermining the Coastal Act's public access protections, and prioritizing private development over the public beach. This plan would permanently lock in beach erosion at Rockaway Beach and West Sharp Park and allow new development to rely on shoreline armoring in a high risk area.

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Sincerely,

Kurt Loeffler
cagoon@yahoo.com, 3047 Chardonnay Drive, Pleasanton, CA, US, 94566

Honey, Julian@Coastal

From: Jaux Wildflower <civicinput@newmode.io>
Sent: Tuesday, April 29, 2025 2:14 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

I urge you to reject the City of Pacifica's current draft of their Local Coastal Land Use Plan unless and until significant changes are made to bring the proposal into conformity with the Coastal Act. The plan's proposed Special Shoreline Resiliency Areas (SSRAs) would allow neighborhood-scale seawalls and redevelopment in hazardous, eroding areas—threatening public trust resources, undermining the Coastal Act's public access protections, and prioritizing private development over the public beach. This plan would permanently lock in beach erosion at Rockaway Beach and West Sharp Park and allow new development to rely on shoreline armoring in a high risk area.

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Sincerely,

Jaux Wildflower
Wildflowerjo@gmail.com, 102 Sunrise Ln, Novato, CA, US, 94949

Honey, Julian@Coastal

From: Madeline Journey-Lynn <civicinput@newmode.io>
Sent: Tuesday, April 29, 2025 2:14 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

I urge you to reject the City of Pacifica's current draft of their Local Coastal Land Use Plan unless and until significant changes are made to bring the proposal into conformity with the Coastal Act. The plan's proposed Special Shoreline Resiliency Areas (SSRAs) would allow neighborhood-scale seawalls and redevelopment in hazardous, eroding areas—threatening public trust resources, undermining the Coastal Act's public access protections, and prioritizing private development over the public beach. This plan would permanently lock in beach erosion at Rockaway Beach and West Sharp Park and allow new development to rely on shoreline armoring in a high risk area.

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Sincerely,

Madeline Journey-Lynn
mjourneylynn@gmail.com, 1054 54th Street, Sacramento, CA, US, 95819

Honey, Julian@Coastal

From: Blake Wu <civiciinput@newmode.io>
Sent: Tuesday, April 29, 2025 2:08 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

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I urge you to reject the City of Pacifica's current draft of their Local Coastal Land Use Plan unless and until significant changes are made to bring the proposal into conformity with the Coastal Act. The plan's proposed Special Shoreline Resiliency Areas (SSRAs) would allow neighborhood-scale seawalls and redevelopment in hazardous, eroding areas—threatening public trust resources, undermining the Coastal Act's public access protections, and prioritizing private development over the public beach. This plan would permanently lock in beach erosion at Rockaway Beach and West Sharp Park and allow new development to rely on shoreline armoring in a high risk area.

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Sincerely,

Blake Wu
skbkms@mail.com, 3600 Mt. Diablo Blvd, Lafayette, CA, US, 94549

Honey, Julian@Coastal

From: Chelsea McCallister <civicinput@newmode.io>
Sent: Tuesday, April 29, 2025 1:50 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

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Sincerely,

Chelsea McCallister
mccallister.chelsea@gmail.com, 420 Perkins St Apt 104, Oakland, CA, US, 94610

Honey, Julian@Coastal

From: Jeff Daniel <civicinput@newmode.io>
Sent: Tuesday, April 29, 2025 1:41 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

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Sincerely,

Jeff Daniel
jhdaniel@rockrivermusic.com, 2586 Great Highway, San Francisco, CA, US, 94116

Honey, Julian@Coastal

From: Zoe Bravo <civicinput@newmode.io>
Sent: Tuesday, April 29, 2025 12:50 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

I urge you to reject the City of Pacifica's current draft of their Local Coastal Land Use Plan unless and until significant changes are made to bring the proposal into conformity with the Coastal Act. The plan's proposed Special Shoreline Resiliency Areas (SSRAs) would allow neighborhood-scale seawalls and redevelopment in hazardous, eroding areas—threatening public trust resources, undermining the Coastal Act's public access protections, and prioritizing private development over the public beach. This plan would permanently lock in beach erosion at Rockaway Beach and West Sharp Park and allow new development to rely on shoreline armoring in a high risk area.

Please revise the plan to ensure:

- Reject the SSRA policies that would allow new development and redevelopment to rely on large-scale seawalls. No new development can rely on seawalls for future protection.
- Shoreline armoring is minimized and only allowed where absolutely necessary and in conformance with Coastal Act Sections 30235 and 30253 (e.g., when designed to eliminate or mitigate adverse impacts on local shoreline sand supply).
- Public beach loss is fully mitigated with real, on-the-ground projects and conditions that create and restore beach and coastal habitat (e.g., removal of structures encroaching on public trust property)—not just fees, park benches and trails align the coast.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,

Zoe Bravo
zoebee11@gmail.com, zoebee11@gmail.com, San Carlos, CA, US, 94070

Honey, Julian@Coastal

From: Olivia VanDamme <civinput@newmode.io>
Sent: Tuesday, April 29, 2025 12:20 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

I urge you to reject the City of Pacifica's current draft of their Local Coastal Land Use Plan unless and until significant changes are made to bring the proposal into conformity with the Coastal Act. The plan's proposed Special Shoreline Resiliency Areas (SSRAs) would allow neighborhood-scale seawalls and redevelopment in hazardous, eroding areas—threatening public trust resources, undermining the Coastal Act's public access protections, and prioritizing private development over the public beach. This plan would permanently lock in beach erosion at Rockaway Beach and West Sharp Park and allow new development to rely on shoreline armoring in a high risk area.

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Sincerely,

Olivia VanDamme
oliviavandamme14@gmail.com, 189 Country Club Drive, San Francisco, CA, US, 94132

Honey, Julian@Coastal

From: NorthCentralCoast@Coastal
Sent: Tuesday, April 29, 2025 11:54 AM
To: Pacifica LUP Update
Subject: FW: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

-----Original Message-----

From: Ellen Boyd <civiciput@newmode.io>
Sent: Tuesday, April 29, 2025 11:37 AM
To: NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

I urge you to reject the City of Pacifica's current draft of their Local Coastal Land Use Plan unless and until significant changes are made to bring the proposal into conformity with the Coastal Act. The plan's proposed Special Shoreline Resiliency Areas (SSRAs) would allow neighborhood-scale seawalls and redevelopment in hazardous, eroding areas—threatening public trust resources, undermining the Coastal Act's public access protections, and prioritizing private development over the public beach. This plan would permanently lock in beach erosion at Rockaway Beach and West Sharp Park and allow new development to rely on shoreline armoring in a high risk area.

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Sincerely,

Ellen Boyd
ellenboydster@gmail.com, 15107 Lassen Way, Morgan Hill, CA, US, 95037

<<http://url4407.newmode.io/wf/open?upn=u001.T4G7paAXLY6XIZScmqrhja1dnZLvPnZNJ-2B3IUAv6fkMJ7dlulk-2BuMZdxRtZlYzl1e6HVIYhnBG4hiuvL2SPP8ARW9SXS4EQXyZm2om-2FbQllbgBqVuW9sqoar2bihCt2jgOzopsjFiGLBz9cklzpXtgGRiVoiX9O3eMz0-2Fy18MxaUol2JcKXdkFt8WUlafyQdPApnelM5Yfkg4thF4r8HHiwMwhetymVgymJuchEmPUtaigRp-2F0LBUFlz4MOCKPZ7OXjOWWlJallvfreSppoldMSX5Hz3xs-2Ff1OGzIEgui-2FvBBW83c2bPLNF6UZ5Ijpmwb-2FZP8YX0fs->

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Honey, Julian@Coastal

From: Ellen Boyd <civiciinput@newmode.io>
Sent: Tuesday, April 29, 2025 11:37 AM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

I urge you to reject the City of Pacifica's current draft of their Local Coastal Land Use Plan unless and until significant changes are made to bring the proposal into conformity with the Coastal Act. The plan's proposed Special Shoreline Resiliency Areas (SSRAs) would allow neighborhood-scale seawalls and redevelopment in hazardous, eroding areas—threatening public trust resources, undermining the Coastal Act's public access protections, and prioritizing private development over the public beach. This plan would permanently lock in beach erosion at Rockaway Beach and West Sharp Park and allow new development to rely on shoreline armoring in a high risk area.

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Sincerely,

Ellen Boyd
ellenboydster@gmail.com, 15107 Lassen Way, Morgan Hill, CA, US, 95037

Honey, Julian@Coastal

From: Lisa Conrad <civiciinput@newmode.io>
Sent: Tuesday, April 29, 2025 11:05 AM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

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Sincerely,

Lisa Conrad
darnoc@earthlink.net, 828 18th Ave., Menlo Park, CA, US, 94025-2020

Honey, Julian@Coastal

From: Rachel Wolf <civiciput@newmode.io>
Sent: Tuesday, April 29, 2025 10:30 AM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

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Sincerely,

Rachel Wolf
therachelswoof@gmail.com, 403 Emeline Ave, Santa Cruz, CA, US, 95060

Honey, Julian@Coastal

From: NorthCentralCoast@Coastal
Sent: Tuesday, April 29, 2025 10:05 AM
To: Pacifica LUP Update
Subject: FW: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

-----Original Message-----

From: John Keener <civiciinput@newmode.io>
Sent: Tuesday, April 29, 2025 9:44 AM
To: NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

I urge you to reject the City of Pacifica's current draft of their Local Coastal Land Use Plan unless and until significant changes are made to bring the proposal into conformity with the Coastal Act. The plan's proposed Special Shoreline Resiliency Areas (SSRAs) would allow neighborhood-scale seawalls and redevelopment in hazardous, eroding areas—threatening public trust resources, undermining the Coastal Act's public access protections, and prioritizing private development over the public beach. This plan would permanently lock in beach erosion at Rockaway Beach and West Sharp Park and allow new development to rely on shoreline armoring in a high risk area.

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Sincerely,

John Keener
JWKeener296@gmail.com, 1211 Galvez Dr, Pacifica, CA, US, 94044

<<http://url4407.newmode.io/wf/open?upn=u001.T4G7paAXLY6XIZScmqrhja1dnZLvPnZNJ-2B3IUAv6fkMJ7dlulk-2BuMZdxRtZlYzl1AeecXdl-2FjiNTTn143na6FCpw3l8bJ9i1ZPEs0mPSuw08BU2cXe427dgz1BYleNuFFE8QUtvpHKpggRWnzEVhOgFYGDYRIXCAgPhMNGgFsArA5TnwzqhqtSR3JlRGbWtkbROQxKrOqwtA8ayxFJaMSUohJ9ZFqmsbgDSYsPKw4vYOdp-2FS9Lv3t9ZT4MrWe2UFmrXxb0-2BAinLYCqR8ldMHMI90fBf1naV93V-2F1INi708C->>

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Honey, Julian@Coastal

From: John Keener <civicinput@newmode.io>
Sent: Tuesday, April 29, 2025 9:44 AM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

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Sincerely,

John Keener
JWKeener296@gmail.com, 1211 Galvez Dr, Pacifica, CA, US, 94044

Honey, Julian@Coastal

From: Cynthia Slavens <civinput@newmode.io>
Sent: Tuesday, April 29, 2025 9:26 AM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

I urge you to reject the City of Pacifica's current draft of their Local Coastal Land Use Plan unless and until significant changes are made to bring the proposal into conformity with the Coastal Act. The plan's proposed Special Shoreline Resiliency Areas (SSRAs) would allow neighborhood-scale seawalls and redevelopment in hazardous, eroding areas—threatening public trust resources, undermining the Coastal Act's public access protections, and prioritizing private development over the public beach. This plan would permanently lock in beach erosion at Rockaway Beach and West Sharp Park and allow new development to rely on shoreline armoring in a high risk area.

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Sincerely,

Cynthia Slavens
cslavens@me.com, 421 Santa Clara Ave, Alameda, CA, US, 94501

Honey, Julian@Coastal

From: Grace Towle <civicinput@newmode.io>
Sent: Tuesday, April 29, 2025 9:12 AM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

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Sincerely,

Grace Towle
ggtowle@gmail.com, 800 Great Highway, San Francisco, CA, US, 94121

Honey, Julian@Coastal

From: Grace Towle <civicinput@newmode.io>
Sent: Tuesday, April 29, 2025 9:12 AM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

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Sincerely,

Grace Towle
ggtowle@gmail.com, 800 Great Highway, San Francisco, CA, US, 94121

Honey, Julian@Coastal

From: Susan Schabinger <civiciinput@newmode.io>
Sent: Tuesday, April 29, 2025 8:18 AM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

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Sincerely,

Susan Schabinger
mermaidsas@comcast.net, P.O. Box 428, El Granada, CA, US, 94018

Honey, Julian@Coastal

From: Victoria Yang <civicinput@newmode.io>
Sent: Tuesday, April 29, 2025 8:04 AM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

I urge you to reject the City of Pacifica's current draft of their Local Coastal Land Use Plan unless and until significant changes are made to bring the proposal into conformity with the Coastal Act. The plan's proposed Special Shoreline Resiliency Areas (SSRAs) would allow neighborhood-scale seawalls and redevelopment in hazardous, eroding areas—threatening public trust resources, undermining the Coastal Act's public access protections, and prioritizing private development over the public beach. This plan would permanently lock in beach erosion at Rockaway Beach and West Sharp Park and allow new development to rely on shoreline armoring in a high risk area.

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Sincerely,

Victoria Yang
victoriayang@gmail.com, 1265 Badger Avenue, Plainfield, IA, US, 50666

Honey, Julian@Coastal

From: Wesley Briones <civinput@newmode.io>
Sent: Tuesday, April 29, 2025 7:59 AM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

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Sincerely,

Wesley Briones
wbriones333@yahoo.com, 4115 39th Ave, Oakland, CA, US, 94619

Honey, Julian@Coastal

From: Alison Gomes <civicinput@newmode.io>
Sent: Tuesday, April 29, 2025 7:10 AM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

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Sincerely,

Alison Gomes
dancinnikki75@hotmail.com, 5604 Fattoria Boulevard, Salida, CA, US, 95368

Honey, Julian@Coastal

From: Kerner BREAUX <civinput@newmode.io>
Sent: Tuesday, April 29, 2025 6:55 AM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

I urge you to reject the City of Pacifica's current draft of their Local Coastal Land Use Plan unless and until significant changes are made to bring the proposal into conformity with the Coastal Act. The plan's proposed Special Shoreline Resiliency Areas (SSRAs) would allow neighborhood-scale seawalls and redevelopment in hazardous, eroding areas—threatening public trust resources, undermining the Coastal Act's public access protections, and prioritizing private development over the public beach. This plan would permanently lock in beach erosion at Rockaway Beach and West Sharp Park and allow new development to rely on shoreline armoring in a high risk area.

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Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,

Kerner BREAUX
colonelbmusic@yahoo.com, 3112 Merrywood Drive, Sacramento, CA, US, 95825

Honey, Julian@Coastal

From: Joseph Banks <civicinput@newmode.io>
Sent: Tuesday, April 29, 2025 5:29 AM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

I urge you to reject the City of Pacifica's current draft of their Local Coastal Land Use Plan unless and until significant changes are made to bring the proposal into conformity with the Coastal Act. The plan's proposed Special Shoreline Resiliency Areas (SSRAs) would allow neighborhood-scale seawalls and redevelopment in hazardous, eroding areas—threatening public trust resources, undermining the Coastal Act's public access protections, and prioritizing private development over the public beach. This plan would permanently lock in beach erosion at Rockaway Beach and West Sharp Park and allow new development to rely on shoreline armoring in a high risk area.

Please revise the plan to ensure:

- Reject the SSRA policies that would allow new development and redevelopment to rely on large-scale seawalls. No new development can rely on seawalls for future protection.
- Shoreline armoring is minimized and only allowed where absolutely necessary and in conformance with Coastal Act Sections 30235 and 30253 (e.g., when designed to eliminate or mitigate adverse impacts on local shoreline sand supply).
- Public beach loss is fully mitigated with real, on-the-ground projects and conditions that create and restore beach and coastal habitat (e.g., removal of structures encroaching on public trust property)—not just fees, park benches and trails align the coast.

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Sincerely,

Joseph Banks
joseph@wayradmedia.com, 885 44th Avenue, San Francisco, CA, US, 94121

Honey, Julian@Coastal

From: Anne Spesick <civicinput@newmode.io>
Sent: Tuesday, April 29, 2025 1:47 AM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

I urge you to reject the City of Pacifica's current draft of their Local Coastal Land Use Plan unless and until significant changes are made to bring the proposal into conformity with the Coastal Act. The plan's proposed Special Shoreline Resiliency Areas (SSRAs) would allow neighborhood-scale seawalls and redevelopment in hazardous, eroding areas—threatening public trust resources, undermining the Coastal Act's public access protections, and prioritizing private development over the public beach. This plan would permanently lock in beach erosion at Rockaway Beach and West Sharp Park and allow new development to rely on shoreline armoring in a high risk area.

Please revise the plan to ensure:

- Reject the SSRA policies that would allow new development and redevelopment to rely on large-scale seawalls. No new development can rely on seawalls for future protection.
- Shoreline armoring is minimized and only allowed where absolutely necessary and in conformance with Coastal Act Sections 30235 and 30253 (e.g., when designed to eliminate or mitigate adverse impacts on local shoreline sand supply).
- Public beach loss is fully mitigated with real, on-the-ground projects and conditions that create and restore beach and coastal habitat (e.g., removal of structures encroaching on public trust property)—not just fees, park benches and trails align the coast.

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Sincerely,

Anne Spesick
rumini@comcast.net, 2935 Sweetwater Trail, Cool, CA, US, 95614

Honey, Julian@Coastal

From: Ian Lee <civinput@newmode.io>
Sent: Tuesday, April 29, 2025 12:39 AM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

I urge you to reject the City of Pacifica's current draft of their Local Coastal Land Use Plan unless and until significant changes are made to bring the proposal into conformity with the Coastal Act. The plan's proposed Special Shoreline Resiliency Areas (SSRAs) would allow neighborhood-scale seawalls and redevelopment in hazardous, eroding areas—threatening public trust resources, undermining the Coastal Act's public access protections, and prioritizing private development over the public beach. This plan would permanently lock in beach erosion at Rockaway Beach and West Sharp Park and allow new development to rely on shoreline armoring in a high risk area.

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- Shoreline armoring is minimized and only allowed where absolutely necessary and in conformance with Coastal Act Sections 30235 and 30253 (e.g., when designed to eliminate or mitigate adverse impacts on local shoreline sand supply).
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Sincerely,

Ian Lee
iansjlee@gmail.com, 838 Avalon Avenue, Lafayette, CA, US, 94549

Honey, Julian@Coastal

From: Julie Kanoff <civicinput@newmode.io>
Sent: Tuesday, April 29, 2025 12:26 AM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

I urge you to reject the City of Pacifica's current draft of their Local Coastal Land Use Plan unless and until significant changes are made to bring the proposal into conformity with the Coastal Act. The plan's proposed Special Shoreline Resiliency Areas (SSRAs) would allow neighborhood-scale seawalls and redevelopment in hazardous, eroding areas—threatening public trust resources, undermining the Coastal Act's public access protections, and prioritizing private development over the public beach. This plan would permanently lock in beach erosion at Rockaway Beach and West Sharp Park and allow new development to rely on shoreline armoring in a high risk area.

Please revise the plan to ensure:

- Reject the SSRA policies that would allow new development and redevelopment to rely on large-scale seawalls. No new development can rely on seawalls for future protection.
- Shoreline armoring is minimized and only allowed where absolutely necessary and in conformance with Coastal Act Sections 30235 and 30253 (e.g., when designed to eliminate or mitigate adverse impacts on local shoreline sand supply).
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Sincerely,

Julie Kanoff
jkanoff@sbcglobal.net, 407 Meister Way, Sacramento, CA, US, 95819

Honey, Julian@Coastal

From: Claire Chambers <civicinput@newmode.io>
Sent: Tuesday, April 29, 2025 12:11 AM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

I urge you to reject the City of Pacifica's current draft of their Local Coastal Land Use Plan unless and until significant changes are made to bring the proposal into conformity with the Coastal Act. The plan's proposed Special Shoreline Resiliency Areas (SSRAs) would allow neighborhood-scale seawalls and redevelopment in hazardous, eroding areas—threatening public trust resources, undermining the Coastal Act's public access protections, and prioritizing private development over the public beach. This plan would permanently lock in beach erosion at Rockaway Beach and West Sharp Park and allow new development to rely on shoreline armoring in a high risk area.

Please revise the plan to ensure:

- Reject the SSRA policies that would allow new development and redevelopment to rely on large-scale seawalls. No new development can rely on seawalls for future protection.
- Shoreline armoring is minimized and only allowed where absolutely necessary and in conformance with Coastal Act Sections 30235 and 30253 (e.g., when designed to eliminate or mitigate adverse impacts on local shoreline sand supply).
- Public beach loss is fully mitigated with real, on-the-ground projects and conditions that create and restore beach and coastal habitat (e.g., removal of structures encroaching on public trust property)—not just fees, park benches and trails align the coast.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,

Claire Chambers
csc293894@gmail.com, 550 Clydesdale Drive, Oakdale, CA, US, 95361

Honey, Julian@Coastal

From: Bruce Coston <civicinput@newmode.io>
Sent: Tuesday, April 29, 2025 12:11 AM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

I urge you to reject the City of Pacifica's current draft of their Local Coastal Land Use Plan unless and until significant changes are made to bring the proposal into conformity with the Coastal Act. The plan's proposed Special Shoreline Resiliency Areas (SSRAs) would allow neighborhood-scale seawalls and redevelopment in hazardous, eroding areas—threatening public trust resources, undermining the Coastal Act's public access protections, and prioritizing private development over the public beach. This plan would permanently lock in beach erosion at Rockaway Beach and West Sharp Park and allow new development to rely on shoreline armoring in a high risk area.

Please revise the plan to ensure:

- Reject the SSRA policies that would allow new development and redevelopment to rely on large-scale seawalls. No new development can rely on seawalls for future protection.
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- Public beach loss is fully mitigated with real, on-the-ground projects and conditions that create and restore beach and coastal habitat (e.g., removal of structures encroaching on public trust property)—not just fees, park benches and trails align the coast.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Enough .

&:

Stop all the insanity . Use Minimum Income and Marcus Schulze 2x Condorcet Compliant Vote Counting to meet the United Nations Universal Declaration of Human Rights part 21.3 . Get the cause too .

Did you notice that mathematically Kamala H. beat Donald T.in the popular vote after correcting for disenfranchisments . You'all are not fooling me ,

Sincerely,

Bruce Coston

jane_ikari@gmx.com, 1055 Manhattan Court, Sunnyvale, CA, US, 94087

Honey, Julian@Coastal

From: J. Barry Gurdin <civicinput@newmode.io>
Sent: Tuesday, April 29, 2025 12:01 AM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

I urge you to reject the City of Pacifica's current draft of their Local Coastal Land Use Plan unless and until significant changes are made to bring the proposal into conformity with the Coastal Act. The plan's proposed Special Shoreline Resiliency Areas (SSRAs) would allow neighborhood-scale seawalls and redevelopment in hazardous, eroding areas—threatening public trust resources, undermining the Coastal Act's public access protections, and prioritizing private development over the public beach. This plan would permanently lock in beach erosion at Rockaway Beach and West Sharp Park and allow new development to rely on shoreline armoring in a high risk area.

Please revise the plan to ensure:

- Reject the SSRA policies that would allow new development and redevelopment to rely on large-scale seawalls. No new development can rely on seawalls for future protection.
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Sincerely,

J. Barry Gurdin
gurdin@hotmail.com, 247 Ortega Street, San Francisco, CA, US, 94122

Honey, Julian@Coastal

From: Joshua Jalaty <civicinput@newmode.io>
Sent: Monday, April 28, 2025 11:58 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

I urge you to reject the City of Pacifica's current draft of their Local Coastal Land Use Plan unless and until significant changes are made to bring the proposal into conformity with the Coastal Act. The plan's proposed Special Shoreline Resiliency Areas (SSRAs) would allow neighborhood-scale seawalls and redevelopment in hazardous, eroding areas—threatening public trust resources, undermining the Coastal Act's public access protections, and prioritizing private development over the public beach. This plan would permanently lock in beach erosion at Rockaway Beach and West Sharp Park and allow new development to rely on shoreline armoring in a high risk area.

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Sincerely,

Joshua Jalaty
jjalaty@gmail.com, 385 Robin Circle, Vacaville, CA, US, 95687

Honey, Julian@Coastal

From: Kimberly Theurich <civinput@newmode.io>
Sent: Monday, April 28, 2025 11:39 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

I urge you to reject the City of Pacifica's current draft of their Local Coastal Land Use Plan unless and until significant changes are made to bring the proposal into conformity with the Coastal Act. The plan's proposed Special Shoreline Resiliency Areas (SSRAs) would allow neighborhood-scale seawalls and redevelopment in hazardous, eroding areas—threatening public trust resources, undermining the Coastal Act's public access protections, and prioritizing private development over the public beach. This plan would permanently lock in beach erosion at Rockaway Beach and West Sharp Park and allow new development to rely on shoreline armoring in a high risk area.

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Sincerely,

Kimberly Theurich
walkingmyth@riseup.net, 1905 Downey Place, El Cerrito, CA, US, 94530

Honey, Julian@Coastal

From: Utkarsh Nath <civicinput@newmode.io>
Sent: Monday, April 28, 2025 10:51 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

I urge you to reject the City of Pacifica's current draft of their Local Coastal Land Use Plan unless and until significant changes are made to bring the proposal into conformity with the Coastal Act. The plan's proposed Special Shoreline Resiliency Areas (SSRAs) would allow neighborhood-scale seawalls and redevelopment in hazardous, eroding areas—threatening public trust resources, undermining the Coastal Act's public access protections, and prioritizing private development over the public beach. This plan would permanently lock in beach erosion at Rockaway Beach and West Sharp Park and allow new development to rely on shoreline armoring in a high risk area.

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Sincerely,

Utkarsh Nath
utkarsh.nath@yahoo.com, 34462 Alberta Terrace, Fremont, CA, US, 94555

Honey, Julian@Coastal

From: April Barcenas <civicinput@newmode.io>
Sent: Monday, April 28, 2025 10:45 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

I urge you to reject the City of Pacifica's current draft of their Local Coastal Land Use Plan unless and until significant changes are made to bring the proposal into conformity with the Coastal Act. The plan's proposed Special Shoreline Resiliency Areas (SSRAs) would allow neighborhood-scale seawalls and redevelopment in hazardous, eroding areas—threatening public trust resources, undermining the Coastal Act's public access protections, and prioritizing private development over the public beach. This plan would permanently lock in beach erosion at Rockaway Beach and West Sharp Park and allow new development to rely on shoreline armoring in a high risk area.

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Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,

April Barcenas
hays9@hotmail.com, 12594 Kennedy Flat Rd space 7, Jackson, CA, US, 95642

Honey, Julian@Coastal

From: Tracy Gibbons <civicinput@newmode.io>
Sent: Monday, April 28, 2025 10:43 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

I urge you to reject the City of Pacifica's current draft of their Local Coastal Land Use Plan unless and until significant changes are made to bring the proposal into conformity with the Coastal Act. The plan's proposed Special Shoreline Resiliency Areas (SSRAs) would allow neighborhood-scale seawalls and redevelopment in hazardous, eroding areas—threatening public trust resources, undermining the Coastal Act's public access protections, and prioritizing private development over the public beach. This plan would permanently lock in beach erosion at Rockaway Beach and West Sharp Park and allow new development to rely on shoreline armoring in a high risk area.

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Sincerely,

Tracy Gibbons
tracy@coasteiseconsulting.com, 1665 Clay Drive, Los Altos, CA, US, 94024

Honey, Julian@Coastal

From: Bryan Hackett <civicinput@newmode.io>
Sent: Monday, April 28, 2025 10:42 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

I urge you to reject the City of Pacifica's current draft of their Local Coastal Land Use Plan unless and until significant changes are made to bring the proposal into conformity with the Coastal Act. The plan's proposed Special Shoreline Resiliency Areas (SSRAs) would allow neighborhood-scale seawalls and redevelopment in hazardous, eroding areas—threatening public trust resources, undermining the Coastal Act's public access protections, and prioritizing private development over the public beach. This plan would permanently lock in beach erosion at Rockaway Beach and West Sharp Park and allow new development to rely on shoreline armoring in a high risk area.

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Sincerely,

Bryan Hackett
bhackettesq@gmail.com, 289 water street , Santa Cruz , CA, US, 95060

Honey, Julian@Coastal

From: Diana Carriger <civiciinput@newmode.io>
Sent: Monday, April 28, 2025 10:16 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

I urge you to reject the City of Pacifica's current draft of their Local Coastal Land Use Plan unless and until significant changes are made to bring the proposal into conformity with the Coastal Act. The plan's proposed Special Shoreline Resiliency Areas (SSRAs) would allow neighborhood-scale seawalls and redevelopment in hazardous, eroding areas—threatening public trust resources, undermining the Coastal Act's public access protections, and prioritizing private development over the public beach. This plan would permanently lock in beach erosion at Rockaway Beach and West Sharp Park and allow new development to rely on shoreline armoring in a high risk area.

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Sincerely,

Diana Carriger
sagitt65@gmail.com, 2000 Allston Way #217, Berkeley, CA, US, 94701

Honey, Julian@Coastal

From: Isha Sangani <civicinput@newmode.io>
Sent: Monday, April 28, 2025 10:02 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

I urge you to reject the City of Pacifica's current draft of their Local Coastal Land Use Plan unless and until significant changes are made to bring the proposal into conformity with the Coastal Act. The plan's proposed Special Shoreline Resiliency Areas (SSRAs) would allow neighborhood-scale seawalls and redevelopment in hazardous, eroding areas—threatening public trust resources, undermining the Coastal Act's public access protections, and prioritizing private development over the public beach. This plan would permanently lock in beach erosion at Rockaway Beach and West Sharp Park and allow new development to rely on shoreline armoring in a high risk area.

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Sincerely,

Isha Sangani
isha.sangani@outlook.com, 2459 Larkin St, San Francisco, MA, US, 94109

Honey, Julian@Coastal

From: Steve Schulz <civinput@newmode.io>
Sent: Monday, April 28, 2025 9:55 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

I urge you to reject the City of Pacifica's current draft of their Local Coastal Land Use Plan unless and until significant changes are made to bring the proposal into conformity with the Coastal Act. The plan's proposed Special Shoreline Resiliency Areas (SSRAs) would allow neighborhood-scale seawalls and redevelopment in hazardous, eroding areas—threatening public trust resources, undermining the Coastal Act's public access protections, and prioritizing private development over the public beach. This plan would permanently lock in beach erosion at Rockaway Beach and West Sharp Park and allow new development to rely on shoreline armoring in a high risk area.

Please revise the plan to ensure:

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Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,

Steve Schulz
lvfrsrf@msn.com, 717 Universal Court, Roseville, CA, US, 95747

Honey, Julian@Coastal

From: christopher james <civiciput@newmode.io>
Sent: Monday, April 28, 2025 9:55 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

I urge you to reject the City of Pacifica's current draft of their Local Coastal Land Use Plan unless and until significant changes are made to bring the proposal into conformity with the Coastal Act. The plan's proposed Special Shoreline Resiliency Areas (SSRAs) would allow neighborhood-scale seawalls and redevelopment in hazardous, eroding areas—threatening public trust resources, undermining the Coastal Act's public access protections, and prioritizing private development over the public beach. This plan would permanently lock in beach erosion at Rockaway Beach and West Sharp Park and allow new development to rely on shoreline armoring in a high risk area.

Please revise the plan to ensure:

- Reject the SSRA policies that would allow new development and redevelopment to rely on large-scale seawalls. No new development can rely on seawalls for future protection.
- Shoreline armoring is minimized and only allowed where absolutely necessary and in conformance with Coastal Act Sections 30235 and 30253 (e.g., when designed to eliminate or mitigate adverse impacts on local shoreline sand supply).
- Public beach loss is fully mitigated with real, on-the-ground projects and conditions that create and restore beach and coastal habitat (e.g., removal of structures encroaching on public trust property)—not just fees, park benches and trails align the coast.

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Sincerely,

christopher james
christopherjames107@gmail.com, 11415 deerfield dr, #10680, truckee, CA, US, 96162

Honey, Julian@Coastal

From: Jill McHale <civicinput@newmode.io>
Sent: Monday, April 28, 2025 9:51 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

Please reject the City of Pacifica's draft of Local Coastal Land Use Plan until the proposal conforms with the Coastal Act.

The plan's proposed Special Shoreline Resiliency Areas (SSRAs) would allow neighborhood-scale seawalls and redevelopment in hazardous, eroding areas—threatening public trust resources, undermining the Coastal Act's public access protections, and prioritizing private development over the public beach. This plan would permanently lock in beach erosion at Rockaway Beach and West Sharp Park and allow new development to rely on shoreline armoring in a high risk area.

Please change the plan to ensure:

- The rejection of SSRA policies that would allow new development and redevelopment to rely on large-scale seawalls. No new development can rely on seawalls for future protection.
- Shoreline armoring is minimized and only allowed where absolutely necessary and in conformance with Coastal Act Sections 30235 and 30253 (e.g., when designed to eliminate or mitigate adverse impacts on local shoreline sand supply).
- Public beach loss is fully mitigated with real, on-the-ground projects and conditions that create and restore beach and coastal habitat (e.g., removal of structures encroaching on public trust property)—not just fees, park benches and trails align the coast.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,

Jill McHale
jill.k.mchale@gmail.com, 794 Sequoia Avenue, San Mateo, CA, US, 94403

Honey, Julian@Coastal

From: Jamie Le <civicinput@newmode.io>
Sent: Monday, April 28, 2025 9:44 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

I urge you to reject the City of Pacifica's current draft of their Local Coastal Land Use Plan unless and until significant changes are made to bring the proposal into conformity with the Coastal Act. The plan's proposed Special Shoreline Resiliency Areas (SSRAs) would allow neighborhood-scale seawalls and redevelopment in hazardous, eroding areas—threatening public trust resources, undermining the Coastal Act's public access protections, and prioritizing private development over the public beach. This plan would permanently lock in beach erosion at Rockaway Beach and West Sharp Park and allow new development to rely on shoreline armoring in a high risk area.

Please revise the plan to ensure:

- Reject the SSRA policies that would allow new development and redevelopment to rely on large-scale seawalls. No new development can rely on seawalls for future protection.
- Shoreline armoring is minimized and only allowed where absolutely necessary and in conformance with Coastal Act Sections 30235 and 30253 (e.g., when designed to eliminate or mitigate adverse impacts on local shoreline sand supply).
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Sincerely,

Jamie Le
jledent43@gmail.com, 1424 Sherman st, Alameda , CA, US, 94501

Honey, Julian@Coastal

From: Christa Laib <civicinput@newmode.io>
Sent: Monday, April 28, 2025 9:10 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

I urge you to reject the City of Pacifica's current draft of their Local Coastal Land Use Plan unless and until significant changes are made to bring the proposal into conformity with the Coastal Act. The plan's proposed Special Shoreline Resiliency Areas (SSRAs) would allow neighborhood-scale seawalls and redevelopment in hazardous, eroding areas—threatening public trust resources, undermining the Coastal Act's public access protections, and prioritizing private development over the public beach. This plan would permanently lock in beach erosion at Rockaway Beach and West Sharp Park and allow new development to rely on shoreline armoring in a high risk area.

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Sincerely,

Christa Laib
laib.christa@gmail.com, 627 Santa Rosa Avenue, Berkeley, CA, US, 94707

Honey, Julian@Coastal

From: Bethany Chung <civicinput@newmode.io>
Sent: Monday, April 28, 2025 7:53 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

I urge you to reject the City of Pacifica's current draft of their Local Coastal Land Use Plan unless and until significant changes are made to bring the proposal into conformity with the Coastal Act. The plan's proposed Special Shoreline Resiliency Areas (SSRAs) would allow neighborhood-scale seawalls and redevelopment in hazardous, eroding areas—threatening public trust resources, undermining the Coastal Act's public access protections, and prioritizing private development over the public beach. This plan would permanently lock in beach erosion at Rockaway Beach and West Sharp Park and allow new development to rely on shoreline armoring in a high risk area.

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Sincerely,

Bethany Chung
blwillbanks@gmail.com, 1251 Windsor Way, Redwood City, CA, US, 94061

Honey, Julian@Coastal

From: Sue Delaney <civicinput@newmode.io>
Sent: Monday, April 28, 2025 7:51 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

I urge you to reject the City of Pacifica's current draft of their Local Coastal Land Use Plan unless and until significant changes are made to bring the proposal into conformity with the Coastal Act. The plan's proposed Special Shoreline Resiliency Areas (SSRAs) would allow neighborhood-scale seawalls and redevelopment in hazardous, eroding areas—threatening public trust resources, undermining the Coastal Act's public access protections, and prioritizing private development over the public beach. This plan would permanently lock in beach erosion at Rockaway Beach and West Sharp Park and allow new development to rely on shoreline armoring in a high risk area.

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Sincerely,

Sue Delaney
sue.pederson.delaney@gmail.com, 490 Edgewood Drive Apt 20, Vacaville , PR, US, 95688

Honey, Julian@Coastal

From: David Go <civiciinput@newmode.io>
Sent: Monday, April 28, 2025 7:42 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

I urge you to reject the City of Pacifica's current draft of their Local Coastal Land Use Plan unless and until significant changes are made to bring the proposal into conformity with the Coastal Act. The plan's proposed Special Shoreline Resiliency Areas (SSRAs) would allow neighborhood-scale seawalls and redevelopment in hazardous, eroding areas—threatening public trust resources, undermining the Coastal Act's public access protections, and prioritizing private development over the public beach. This plan would permanently lock in beach erosion at Rockaway Beach and West Sharp Park and allow new development to rely on shoreline armoring in a high risk area.

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Sincerely,

David Go
davidgo@cruzio.com, 307 Wanzer Street, Santa Cruz, CA, US, 95060

Honey, Julian@Coastal

From: Fernando Sucre <civicinput@newmode.io>
Sent: Monday, April 28, 2025 7:31 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

I urge you to reject the City of Pacifica's current draft of their Local Coastal Land Use Plan unless and until significant changes are made to bring the proposal into conformity with the Coastal Act. The plan's proposed Special Shoreline Resiliency Areas (SSRAs) would allow neighborhood-scale seawalls and redevelopment in hazardous, eroding areas—threatening public trust resources, undermining the Coastal Act's public access protections, and prioritizing private development over the public beach. This plan would permanently lock in beach erosion at Rockaway Beach and West Sharp Park and allow new development to rely on shoreline armoring in a high risk area.

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Sincerely,

Fernando Sucre
frssubs@gmail.com, 340 Oakdale street, Redwood City , PR, US, 94062

Honey, Julian@Coastal

From: Jenny L Del Vecchio <civicinput@newmode.io>
Sent: Monday, April 28, 2025 7:22 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

I urge you to reject the City of Pacifica's current draft of their Local Coastal Land Use Plan unless and until significant changes are made to bring the proposal into conformity with the Coastal Act. The plan's proposed Special Shoreline Resiliency Areas (SSRAs) would allow neighborhood-scale seawalls and redevelopment in hazardous, eroding areas—threatening public trust resources, undermining the Coastal Act's public access protections, and prioritizing private development over the public beach. This plan would permanently lock in beach erosion at Rockaway Beach and West Sharp Park and allow new development to rely on shoreline armoring in a high risk area.

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Sincerely,

Jenny L Del Vecchio
jendelvec@hotmail.com, 1181 Bonita Avenue, Mountain View, CA, US, 94040

Honey, Julian@Coastal

From: Julie Lockhart <civicinput@newmode.io>
Sent: Monday, April 28, 2025 7:21 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

I urge you to reject the City of Pacifica's current draft of their Local Coastal Land Use Plan unless and until significant changes are made to bring the proposal into conformity with the Coastal Act. The plan's proposed Special Shoreline Resiliency Areas (SSRAs) would allow neighborhood-scale seawalls and redevelopment in hazardous, eroding areas—threatening public trust resources, undermining the Coastal Act's public access protections, and prioritizing private development over the public beach. This plan would permanently lock in beach erosion at Rockaway Beach and West Sharp Park and allow new development to rely on shoreline armoring in a high risk area.

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Sincerely,

Julie Lockhart
lockhart.julie@gmail.com, 1431 Serra Drive, Pacifica, CA, US, 94044

Honey, Julian@Coastal

From: Ellen Franzen <civicinput@newmode.io>
Sent: Monday, April 28, 2025 6:17 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

I urge you to reject the City of Pacifica's current draft of their Local Coastal Land Use Plan unless and until significant changes are made to bring the proposal into conformity with the Coastal Act. The plan's proposed Special Shoreline Resiliency Areas (SSRAs) would allow neighborhood-scale seawalls and redevelopment in hazardous, eroding areas—threatening public trust resources, undermining the Coastal Act's public access protections, and prioritizing private development over the public beach. This plan would permanently lock in beach erosion at Rockaway Beach and West Sharp Park and allow new development to rely on shoreline armoring in a high risk area.

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Sincerely,

Ellen Franzen
ellenfranzen@duck.com, 970 Jones Street, Berkeley, CA, US, 94710

Honey, Julian@Coastal

From: Brian Burke <civicinput@newmode.io>
Sent: Monday, April 28, 2025 6:06 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

I urge you to reject the City of Pacifica's current draft of their Local Coastal Land Use Plan unless and until significant changes are made to bring the proposal into conformity with the Coastal Act. The plan's proposed Special Shoreline Resiliency Areas (SSRAs) would allow neighborhood-scale seawalls and redevelopment in hazardous, eroding areas—threatening public trust resources, undermining the Coastal Act's public access protections, and prioritizing private development over the public beach. This plan would permanently lock in beach erosion at Rockaway Beach and West Sharp Park and allow new development to rely on shoreline armoring in a high risk area.

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Sincerely,

Brian Burke
brntburke@gmail.com, 4144 White Oaks Ave, San Jose, CA, US, 95124

Honey, Julian@Coastal

From: Hugh Gurin LLC <civicinput@newmode.io>
Sent: Monday, April 28, 2025 6:02 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

I urge you to reject the City of Pacifica's current draft of their Local Coastal Land Use Plan unless and until significant changes are made to bring the proposal into conformity with the Coastal Act. The plan's proposed Special Shoreline Resiliency Areas (SSRAs) would allow neighborhood-scale seawalls and redevelopment in hazardous, eroding areas—threatening public trust resources, undermining the Coastal Act's public access protections, and prioritizing private development over the public beach. This plan would permanently lock in beach erosion at Rockaway Beach and West Sharp Park and allow new development to rely on shoreline armoring in a high risk area.

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Sincerely,

Hugh Gurin LLC
hugh.gurin@gmail.com, 2222 Ulloa Street, San Francisco, CA, US, 94116-2448

Honey, Julian@Coastal

From: Rolf Schreiber <civicinput@newmode.io>
Sent: Monday, April 28, 2025 5:48 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

I urge you to reject the City of Pacifica's current draft of their Local Coastal Land Use Plan unless and until significant changes are made to bring the proposal into conformity with the Coastal Act. The plan's proposed Special Shoreline Resiliency Areas (SSRAs) would allow neighborhood-scale seawalls and redevelopment in hazardous, eroding areas—threatening public trust resources, undermining the Coastal Act's public access protections, and prioritizing private development over the public beach. This plan would permanently lock in beach erosion at Rockaway Beach and West Sharp Park and allow new development to rely on shoreline armoring in a high risk area.

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Sincerely,

Rolf Schreiber
rolf.schreiber@gmail.com, 1142 Cotswald Ct, Sunnyvale, CA, US, 94087

Honey, Julian@Coastal

From: Andrea Tomaszewski <civicinput@newmode.io>
Sent: Monday, April 28, 2025 5:48 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

I urge you to reject the City of Pacifica's current draft of their Local Coastal Land Use Plan unless and until significant changes are made to bring the proposal into conformity with the Coastal Act. The plan's proposed Special Shoreline Resiliency Areas (SSRAs) would allow neighborhood-scale seawalls and redevelopment in hazardous, eroding areas—threatening public trust resources, undermining the Coastal Act's public access protections, and prioritizing private development over the public beach. This plan would permanently lock in beach erosion at Rockaway Beach and West Sharp Park and allow new development to rely on shoreline armoring in a high risk area.

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Sincerely,

Andrea Tomaszewski
tomaszewski001@yahoo.com, 6 Grandview Place, Walnut Creek, CA, US, 94595

Honey, Julian@Coastal

From: Amy Mc Manus <civinput@newmode.io>
Sent: Monday, April 28, 2025 5:43 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

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Sincerely,

Amy Mc Manus
asmtouyou@gmail.com, 1738 42nd Avenue , San Francisco , CA, US, 94122

Honey, Julian@Coastal

From: Aaron Zetley <civicinput@newmode.io>
Sent: Monday, April 28, 2025 5:42 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

I urge you to reject the City of Pacifica's current draft of their Local Coastal Land Use Plan unless and until significant changes are made to bring the proposal into conformity with the Coastal Act. The plan's proposed Special Shoreline Resiliency Areas (SSRAs) would allow neighborhood-scale seawalls and redevelopment in hazardous, eroding areas—threatening public trust resources, undermining the Coastal Act's public access protections, and prioritizing private development over the public beach. This plan would permanently lock in beach erosion at Rockaway Beach and West Sharp Park and allow new development to rely on shoreline armoring in a high risk area.

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Sincerely,

Aaron Zetley
azet14@gmail.com, 494 Manor Drive , Pacifica , CA, US, 94044

Honey, Julian@Coastal

From: Jim Stephenson <civinput@newmode.io>
Sent: Monday, April 28, 2025 5:08 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

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Sincerely,

Jim Stephenson
jimstephenson3@gmail.com, 114 Edgewood Ave, San Francisco, CA, US, 94117

Honey, Julian@Coastal

From: Bruce Brewington <civiciinput@newmode.io>
Sent: Monday, April 28, 2025 4:56 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

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Sincerely,

Bruce Brewington
thereefriders@comcast.net, 475 Roberts Road, Pacifica, PR, US, 94044

Honey, Julian@Coastal

From: Loulou Gluck <civicinput@newmode.io>
Sent: Monday, April 28, 2025 4:50 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

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Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,

Loulou Gluck
loulougluck@gmail.com, 2212 Blake Street, Berkeley, CA, US, 94704

Honey, Julian@Coastal

From: Tom Parsons <civicinput@newmode.io>
Sent: Monday, April 28, 2025 4:43 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

I urge you to reject the City of Pacifica's current draft of their Local Coastal Land Use Plan unless and until significant changes are made to bring the proposal into conformity with the Coastal Act. The plan's proposed Special Shoreline Resiliency Areas (SSRAs) would allow neighborhood-scale seawalls and redevelopment in hazardous, eroding areas—threatening public trust resources, undermining the Coastal Act's public access protections, and prioritizing private development over the public beach. This plan would permanently lock in beach erosion at Rockaway Beach and West Sharp Park and allow new development to rely on shoreline armoring in a high risk area.

Please revise the plan to ensure:

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Sincerely,

Tom Parsons
tomparsons@earthlink.net, 1324 Mildred Avenue, San Jose, WI, US, 95125

Honey, Julian@Coastal

From: Mark Faughn <civicinput@newmode.io>
Sent: Monday, April 28, 2025 4:43 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

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Sincerely,

Mark Faughn
mfaughn@sti.net, 50889 Road 426 Spc 15, Oakhurst, PR, US, 93644

From: Amanda Jo Masterton <civicinput@newmode.io>
Sent: Monday, April 28, 2025 4:41 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

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Sincerely,

Amanda Jo Masterton
mastertonamanda@gmail.com, 7 Palma Avenue, Watsonville, CA, US, 95076

Honey, Julian@Coastal

From: Christopher DeVry <civicinput@newmode.io>
Sent: Monday, April 28, 2025 4:36 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

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Sincerely,

Christopher DeVry
cgdevry@gmail.com, 602 Francisco Street, El Granada, CA, US, 94018

Honey, Julian@Coastal

From: Debra Leow <civicinput@newmode.io>
Sent: Monday, April 28, 2025 4:34 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

I urge you to reject the City of Pacifica's current draft of their Local Coastal Land Use Plan unless and until significant changes are made to bring the proposal into conformity with the Coastal Act. The plan's proposed Special Shoreline Resiliency Areas (SSRAs) would allow neighborhood-scale seawalls and redevelopment in hazardous, eroding areas—threatening public trust resources, undermining the Coastal Act's public access protections, and prioritizing private development over the public beach. This plan would permanently lock in beach erosion at Rockaway Beach and West Sharp Park and allow new development to rely on shoreline armoring in a high risk area.

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Sincerely,

Debra Leow
debraleow@yahoo.com, 159 14th Avenue, San Francisco, CA, US, 94118

Honey, Julian@Coastal

From: Mia Bolton <civinput@newmode.io>
Sent: Monday, April 28, 2025 4:24 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

I urge you to reject the City of Pacifica's current draft of their Local Coastal Land Use Plan unless and until significant changes are made to bring the proposal into conformity with the Coastal Act. The plan's proposed Special Shoreline Resiliency Areas (SSRAs) would allow neighborhood-scale seawalls and redevelopment in hazardous, eroding areas—threatening public trust resources, undermining the Coastal Act's public access protections, and prioritizing private development over the public beach. This plan would permanently lock in beach erosion at Rockaway Beach and West Sharp Park and allow new development to rely on shoreline armoring in a high risk area.

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Sincerely,

Mia Bolton
miakbolton@gmail.com, 2850 Middlefield Rd Apt 318, Palo Alto, CA, US, 94306

Honey, Julian@Coastal

From: Ben Dotson <civicinput@newmode.io>
Sent: Monday, April 28, 2025 4:21 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

I urge you to reject the City of Pacifica's current draft of their Local Coastal Land Use Plan unless and until significant changes are made to bring the proposal into conformity with the Coastal Act. The plan's proposed Special Shoreline Resiliency Areas (SSRAs) would allow neighborhood-scale seawalls and redevelopment in hazardous, eroding areas—threatening public trust resources, undermining the Coastal Act's public access protections, and prioritizing private development over the public beach. This plan would permanently lock in beach erosion at Rockaway Beach and West Sharp Park and allow new development to rely on shoreline armoring in a high risk area.

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Sincerely,

Ben Dotson
bcdotson2@gmail.com, 331 27th Ave #1A, San Francisco , CA, US, 94121

Honey, Julian@Coastal

From: Taylor Davidson <civicinput@newmode.io>
Sent: Monday, April 28, 2025 4:11 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

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Sincerely,

Taylor Davidson
taylor.cdavidso1@gmail.com, 111 Hiawatha, Pacifica , CA, US, 94044

Honey, Julian@Coastal

From: Naomi Foss-Alfke <civiciinput@newmode.io>
Sent: Monday, April 28, 2025 3:40 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

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Sincerely,

Naomi Foss-Alfke
naomi.fossalfke2016@gmail.com, 688 N 7th street, San Jose, CA, US, 95112

Honey, Julian@Coastal

From: Amy Neeser <civicinput@newmode.io>
Sent: Monday, April 28, 2025 3:28 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

I urge you to reject the City of Pacifica's current draft of their Local Coastal Land Use Plan unless and until significant changes are made to bring the proposal into conformity with the Coastal Act. The plan's proposed Special Shoreline Resiliency Areas (SSRAs) would allow neighborhood-scale seawalls and redevelopment in hazardous, eroding areas—threatening public trust resources, undermining the Coastal Act's public access protections, and prioritizing private development over the public beach. This plan would permanently lock in beach erosion at Rockaway Beach and West Sharp Park and allow new development to rely on shoreline armoring in a high risk area.

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Sincerely,

Amy Neeser
fraulein.amy@gmail.com, 600 William Street Apt 550, Oakland, CA, US, 94612

Honey, Julian@Coastal

From: Jean Lindgren <civicinput@newmode.io>
Sent: Monday, April 28, 2025 3:28 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

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Sincerely,

Jean Lindgren
earthspiritsf@gmail.com, 389 Guerrero Street, San Francisco, CA, US, 94103

Honey, Julian@Coastal

From: Scott Davidson <civicinput@newmode.io>
Sent: Monday, April 28, 2025 3:24 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

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Sincerely,

Scott Davidson
scottyd.davidson@gmail.com, 1747 Curtner Ave, San Jose, CA, US, 95124

From: Christopher Hamilton <civicinput@newmode.io>
Sent: Monday, April 28, 2025 3:21 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

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Sincerely,

Christopher Hamilton
ceh41845@gmail.com, 1316 Albina Ave, Berkeley, CA, US, 94706-2506

Honey, Julian@Coastal

From: Andrew Boyle <civicinput@newmode.io>
Sent: Monday, April 28, 2025 3:20 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

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Sincerely,

Andrew Boyle
andrewjamesboyle@gmail.com, 1511 Naglee Avenue, San Jose, CA, US, 95126

Honey, Julian@Coastal

From: AJ Cho <civinput@newmode.io>
Sent: Monday, April 28, 2025 3:17 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

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Sincerely,

AJ Cho
amenoartemis@gmail.com, 159 Santa Teresa, San Leandro, CA, US, 94579

Honey, Julian@Coastal

From: Sarah Hafer <civicinput@newmode.io>
Sent: Monday, April 28, 2025 3:15 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

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Sincerely,

Sarah Hafer
sarah.hafer@gmail.com, 12111 Northeast 4th Street, Vancouver, WA, US, 98684

Honey, Julian@Coastal

From: Sara Michie <civiciinput@newmode.io>
Sent: Monday, April 28, 2025 3:14 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

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Sincerely,

Sara Michie
sara_michie@yahoo.com, 522 Central Ave, Menlo Park, CA, US, 94025-2807

Honey, Julian@Coastal

From: Sara Michie <civicinput@newmode.io>
Sent: Monday, April 28, 2025 3:14 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

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Sincerely,

Sara Michie
sara_michie@yahoo.com, 522 Central Ave, Menlo Park, CA, US, 94025-2807

Honey, Julian@Coastal

From: kendra fowler <civicinput@newmode.io>
Sent: Monday, April 28, 2025 3:11 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

I urge you to reject the City of Pacifica's current draft of their Local Coastal Land Use Plan unless and until significant changes are made to bring the proposal into conformity with the Coastal Act. The plan's proposed Special Shoreline Resiliency Areas (SSRAs) would allow neighborhood-scale seawalls and redevelopment in hazardous, eroding areas—threatening public trust resources, undermining the Coastal Act's public access protections, and prioritizing private development over the public beach. This plan would permanently lock in beach erosion at Rockaway Beach and West Sharp Park and allow new development to rely on shoreline armoring in a high risk area.

Please revise the plan to ensure:

- Reject the SSRA policies that would allow new development and redevelopment to rely on large-scale seawalls. No new development can rely on seawalls for future protection.
- Shoreline armoring is minimized and only allowed where absolutely necessary and in conformance with Coastal Act Sections 30235 and 30253 (e.g., when designed to eliminate or mitigate adverse impacts on local shoreline sand supply).
- Public beach loss is fully mitigated with real, on-the-ground projects and conditions that create and restore beach and coastal habitat (e.g., removal of structures encroaching on public trust property)—not just fees, park benches and trails align the coast.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,

kendra fowler
kendrakayfowler@gmail.com, 870 38th ave , san francisco , CA, US, 94121

Honey, Julian@Coastal

From: Gretchen Hoover Anderson <civicinput@newmode.io>
Sent: Monday, April 28, 2025 3:06 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

I urge you to reject the City of Pacifica's current draft of their Local Coastal Land Use Plan unless and until significant changes are made to bring the proposal into conformity with the Coastal Act. The plan's proposed Special Shoreline Resiliency Areas (SSRAs) would allow neighborhood-scale seawalls and redevelopment in hazardous, eroding areas—threatening public trust resources, undermining the Coastal Act's public access protections, and prioritizing private development over the public beach. This plan would permanently lock in beach erosion at Rockaway Beach and West Sharp Park and allow new development to rely on shoreline armoring in a high risk area.

Please revise the plan to ensure:

- Reject the SSRA policies that would allow new development and redevelopment to rely on large-scale seawalls. No new development can rely on seawalls for future protection.
- Shoreline armoring is minimized and only allowed where absolutely necessary and in conformance with Coastal Act Sections 30235 and 30253 (e.g., when designed to eliminate or mitigate adverse impacts on local shoreline sand supply).
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Sincerely,

Gretchen Hoover Anderson
ghooversf@gmail.com, 5125 Geary Blvd., Apt 7, San Francisco, CA, US, 94118

Honey, Julian@Coastal

From: Corey Gilbert <civicinput@newmode.io>
Sent: Monday, April 28, 2025 3:06 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

I urge you to reject the City of Pacifica's current draft of their Local Coastal Land Use Plan unless and until significant changes are made to bring the proposal into conformity with the Coastal Act. The plan's proposed Special Shoreline Resiliency Areas (SSRAs) would allow neighborhood-scale seawalls and redevelopment in hazardous, eroding areas—threatening public trust resources, undermining the Coastal Act's public access protections, and prioritizing private development over the public beach. This plan would permanently lock in beach erosion at Rockaway Beach and West Sharp Park and allow new development to rely on shoreline armoring in a high risk area.

Please revise the plan to ensure:

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Sincerely,

Corey Gilbert
coreygilbert@sbcglobal.net, 1368 Lucio Lane, Sacramento, CA, US, 95822

Honey, Julian@Coastal

From: StopCavingTo FuckingFascist <civicinput@newmode.io>
Sent: Monday, April 28, 2025 3:06 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

I urge you to reject the City of Pacifica's current draft of their Local Coastal Land Use Plan unless and until significant changes are made to bring the proposal into conformity with the Coastal Act. The plan's proposed Special Shoreline Resiliency Areas (SSRAs) would allow neighborhood-scale seawalls and redevelopment in hazardous, eroding areas—threatening public trust resources, undermining the Coastal Act's public access protections, and prioritizing private development over the public beach. This plan would permanently lock in beach erosion at Rockaway Beach and West Sharp Park and allow new development to rely on shoreline armoring in a high risk area.

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Sincerely,

StopCavingTo FuckingFascist
shainsu@yahoo.com, 23 Av, Oakland, CA, US, 94606

Honey, Julian@Coastal

From: StopCavingTo FuckingFascist <civicinput@newmode.io>
Sent: Monday, April 28, 2025 3:05 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

I urge you to reject the City of Pacifica's current draft of their Local Coastal Land Use Plan unless and until significant changes are made to bring the proposal into conformity with the Coastal Act. The plan's proposed Special Shoreline Resiliency Areas (SSRAs) would allow neighborhood-scale seawalls and redevelopment in hazardous, eroding areas—threatening public trust resources, undermining the Coastal Act's public access protections, and prioritizing private development over the public beach. This plan would permanently lock in beach erosion at Rockaway Beach and West Sharp Park and allow new development to rely on shoreline armoring in a high risk area.

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Sincerely,

StopCavingTo FuckingFascist
shainsu@yahoo.com, 23 Av, Oakland, CA, US, 94606

Honey, Julian@Coastal

From: RANDALL LEONARD <civicinput@newmode.io>
Sent: Monday, April 28, 2025 3:03 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

I urge you to reject the City of Pacifica's current draft of their Local Coastal Land Use Plan unless and until significant changes are made to bring the proposal into conformity with the Coastal Act. The plan's proposed Special Shoreline Resiliency Areas (SSRAs) would allow neighborhood-scale seawalls and redevelopment in hazardous, eroding areas—threatening public trust resources, undermining the Coastal Act's public access protections, and prioritizing private development over the public beach. This plan would permanently lock in beach erosion at Rockaway Beach and West Sharp Park and allow new development to rely on shoreline armoring in a high risk area.

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Sincerely,

RANDALL LEONARD
randallsc@cruzio.com, 4155 Nova Drive, Santa Cruz, CA, US, 95062

Honey, Julian@Coastal

From: Mikel Davenport <civicinput@newmode.io>
Sent: Monday, April 28, 2025 2:56 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

I urge you to reject the City of Pacifica's current draft of their Local Coastal Land Use Plan unless and until significant changes are made to bring the proposal into conformity with the Coastal Act. The plan's proposed Special Shoreline Resiliency Areas (SSRAs) would allow neighborhood-scale seawalls and redevelopment in hazardous, eroding areas—threatening public trust resources, undermining the Coastal Act's public access protections, and prioritizing private development over the public beach. This plan would permanently lock in beach erosion at Rockaway Beach and West Sharp Park and allow new development to rely on shoreline armoring in a high risk area.

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Sincerely,

Mikel Davenport
mikeldavenport@yahoo.com, 400 Precita Ave, 402 Precita Ave, San Francisco, CA, US, 94110

Honey, Julian@Coastal

From: william Vandervennet <civicinput@newmode.io>
Sent: Monday, April 28, 2025 2:52 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

I urge you to reject the City of Pacifica's current draft of their Local Coastal Land Use Plan unless and until significant changes are made to bring the proposal into conformity with the Coastal Act. The plan's proposed Special Shoreline Resiliency Areas (SSRAs) would allow neighborhood-scale seawalls and redevelopment in hazardous, eroding areas—threatening public trust resources, undermining the Coastal Act's public access protections, and prioritizing private development over the public beach. This plan would permanently lock in beach erosion at Rockaway Beach and West Sharp Park and allow new development to rely on shoreline armoring in a high risk area.

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Sincerely,

william Vandervennet
wrv2012@gmail.com, 1341, David St., Apt. 319, San Mateo, CA, US, 94403

Honey, Julian@Coastal

From: Joelle Nelson Achirica <civicinput@newmode.io>
Sent: Monday, April 28, 2025 2:49 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

I urge you to reject the City of Pacifica's current draft of their Local Coastal Land Use Plan unless and until significant changes are made to bring the proposal into conformity with the Coastal Act. The plan's proposed Special Shoreline Resiliency Areas (SSRAs) would allow neighborhood-scale seawalls and redevelopment in hazardous, eroding areas—threatening public trust resources, undermining the Coastal Act's public access protections, and prioritizing private development over the public beach. This plan would permanently lock in beach erosion at Rockaway Beach and West Sharp Park and allow new development to rely on shoreline armoring in a high risk area.

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Sincerely,

Joelle Nelson Achirica
lugnuts4us@yahoo.com, 10 Ervin ct , Gilroy, CA, US, 95020

Honey, Julian@Coastal

From: Kelly Gahagan <civicinput@newmode.io>
Sent: Monday, April 28, 2025 2:45 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

I urge you to reject the City of Pacifica's current draft of their Local Coastal Land Use Plan unless and until significant changes are made to bring the proposal into conformity with the Coastal Act. The plan's proposed Special Shoreline Resiliency Areas (SSRAs) would allow neighborhood-scale seawalls and redevelopment in hazardous, eroding areas—threatening public trust resources, undermining the Coastal Act's public access protections, and prioritizing private development over the public beach. This plan would permanently lock in beach erosion at Rockaway Beach and West Sharp Park and allow new development to rely on shoreline armoring in a high risk area.

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Sincerely,

Kelly Gahagan
kkgahagan@hotmail.com, 796 Crespi dr, Pacifica, CA, US, 94044

Honey, Julian@Coastal

From: Chris Baker <civicinput@newmode.io>
Sent: Monday, April 28, 2025 2:43 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

I urge you to reject the City of Pacifica's current draft of their Local Coastal Land Use Plan unless and until significant changes are made to bring the proposal into conformity with the Coastal Act. The plan's proposed Special Shoreline Resiliency Areas (SSRAs) would allow neighborhood-scale seawalls and redevelopment in hazardous, eroding areas—threatening public trust resources, undermining the Coastal Act's public access protections, and prioritizing private development over the public beach. This plan would permanently lock in beach erosion at Rockaway Beach and West Sharp Park and allow new development to rely on shoreline armoring in a high risk area.

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Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,

Chris Baker
cdbaker30@hotmail.com, 1127 Eastmoor Road, Burlingame, CA, US, 94010

Honey, Julian@Coastal

From: Heather Murdock <civiciinput@newmode.io>
Sent: Monday, April 28, 2025 2:40 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

I urge you to reject the City of Pacifica's current draft of their Local Coastal Land Use Plan unless and until significant changes are made to bring the proposal into conformity with the Coastal Act. The plan's proposed Special Shoreline Resiliency Areas (SSRAs) would allow neighborhood-scale seawalls and redevelopment in hazardous, eroding areas—threatening public trust resources, undermining the Coastal Act's public access protections, and prioritizing private development over the public beach. This plan would permanently lock in beach erosion at Rockaway Beach and West Sharp Park and allow new development to rely on shoreline armoring in a high risk area.

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Sincerely,

Heather Murdock
hgmurdock@yahoo.com, 1468 18th Ave, San Francisco, CA, US, 94122

Honey, Julian@Coastal

From: Karen Kirschling <civicinput@newmode.io>
Sent: Monday, April 28, 2025 2:36 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

I urge you to reject the City of Pacifica's current draft of their Local Coastal Land Use Plan unless and until significant changes are made to bring the proposal into conformity with the Coastal Act. The plan's proposed Special Shoreline Resiliency Areas (SSRAs) would allow neighborhood-scale seawalls and redevelopment in hazardous, eroding areas—threatening public trust resources, undermining the Coastal Act's public access protections, and prioritizing private development over the public beach. This plan would permanently lock in beach erosion at Rockaway Beach and West Sharp Park and allow new development to rely on shoreline armoring in a high risk area.

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Sincerely,

Karen Kirschling
kumasong@icloud.com, 633 Oak, SF, CA, US, 94117

Honey, Julian@Coastal

From: Antony Luxton <civiciinput@newmode.io>
Sent: Monday, April 28, 2025 2:36 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

Local residents and reputable scientists have recently made a proposal based on newer more efficient technology where everyone wins. Presented April 28th. As such, I urge you to reject the City of Pacifica's current draft of their Local Coastal Land Use Plan unless and until significant changes are made to bring the proposal into conformity with the Coastal Act. The plan's proposed Special Shoreline Resiliency Areas (SSRAs) would allow neighborhood-scale seawalls and redevelopment in hazardous, eroding areas—threatening public trust resources, undermining the Coastal Act's public access protections, and prioritizing private development over the public beach. This plan would permanently lock in beach erosion at Rockaway Beach and West Sharp Park and allow new development to rely on shoreline armoring in a high risk area.

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Sincerely,

Antony Luxton
antony.luxton@gmail.com, 1431 Serra Drive, Pacifica, CA, US, 94044

Honey, Julian@Coastal

From: Kenzie Phillips <civicinput@newmode.io>
Sent: Monday, April 28, 2025 2:34 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

I truly urge you to reject the City of Pacifica's current draft of their Local Coastal Land Use Plan unless and until significant changes are made to bring the proposal into conformity with the Coastal Act.

The plan's proposed Special Shoreline Resiliency Areas (SSRAs) would allow neighborhood-scale seawalls and redevelopment in hazardous, eroding areas—threatening public trust resources, undermining the Coastal Act's public access protections, and prioritizing private development over the public beach. This plan would permanently lock in beach erosion at Rockaway Beach and West Sharp Park and allow new development to rely on shoreline armoring in a high risk area.

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Sincerely,

Kenzie Phillips
kenziephillips712@gmail.com, 1800 Madison Street, Oakland, CA, US, 94612

Honey, Julian@Coastal

From: Kenzie Phillips <civicinput@newmode.io>
Sent: Monday, April 28, 2025 2:34 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

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Sincerely,

Kenzie Phillips
kenziephillips712@gmail.com, 1800 Madison Street, Oakland, CA, US, 94612

Honey, Julian@Coastal

From: Mark Pugh <civicinput@newmode.io>
Sent: Monday, April 28, 2025 2:26 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

I urge you to reject the City of Pacifica's current draft of their Local Coastal Land Use Plan unless and until significant changes are made to bring the proposal into conformity with the Coastal Act. The plan's proposed Special Shoreline Resiliency Areas (SSRAs) would allow neighborhood-scale seawalls and redevelopment in hazardous, eroding areas—threatening public trust resources, undermining the Coastal Act's public access protections, and prioritizing private development over the public beach. This plan would permanently lock in beach erosion at Rockaway Beach and West Sharp Park and allow new development to rely on shoreline armoring in a high risk area.

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Sincerely,

Mark Pugh
mopugh@mindspring.com, 1352 47 Ave, San Francisco, CA, US, 94122

Honey, Julian@Coastal

From: Kermit Cuff <civinput@newmode.io>
Sent: Monday, April 28, 2025 2:26 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

I urge you to reject the City of Pacifica's current draft of their Local Coastal Land Use Plan unless and until significant changes are made to bring the proposal into conformity with the Coastal Act. The plan's proposed Special Shoreline Resiliency Areas (SSRAs) would allow neighborhood-scale seawalls and redevelopment in hazardous, eroding areas—threatening public trust resources, undermining the Coastal Act's public access protections, and prioritizing private development over the public beach. This plan would permanently lock in beach erosion at Rockaway Beach and West Sharp Park and allow new development to rely on shoreline armoring in a high risk area.

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Sincerely,

Kermit Cuff
tierno23@yahoo.com, 338 Mariposa Ave. #2, Mountain View, CA, US, 94041

From: Karen Jacques <civicinput@newmode.io>
Sent: Monday, April 28, 2025 2:17 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

I urge you to reject the City of Pacifica's current draft of their Local Coastal Land Use Plan unless and until significant changes are made to bring the proposal into conformity with the Coastal Act. The plan's proposed Special Shoreline Resiliency Areas (SSRAs) would allow neighborhood-scale seawalls and redevelopment in hazardous, eroding areas—threatening public trust resources, undermining the Coastal Act's public access protections, and prioritizing private development over the public beach. This plan would permanently lock in beach erosion at Rockaway Beach and West Sharp Park and allow new development to rely on shoreline armoring in a high risk area.

Please revise the plan to ensure:

- Reject the SSRA policies that would allow new development and redevelopment to rely on large-scale seawalls. No new development can rely on seawalls for future protection.
- Shoreline armoring is minimized and only allowed where absolutely necessary and in conformance with Coastal Act Sections 30235 and 30253 (e.g., when designed to eliminate or mitigate adverse impacts on local shoreline sand supply).
- Public beach loss is fully mitigated with real, on-the-ground projects and conditions that create and restore beach and coastal habitat (e.g., removal of structures encroaching on public trust property)—not just fees, park benches and trails align the coast.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,

Karen Jacques
threegables1819@gmail.com, 1209 T St #3, Sacramento, PR, US, 95811

Honey, Julian@Coastal

From: Pieter Nelissen <civicinput@newmode.io>
Sent: Monday, April 28, 2025 2:15 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

I urge you to reject the City of Pacifica's current draft of their Local Coastal Land Use Plan unless and until significant changes are made to bring the proposal into conformity with the Coastal Act. The plan's proposed Special Shoreline Resiliency Areas (SSRAs) would allow neighborhood-scale seawalls and redevelopment in hazardous, eroding areas—threatening public trust resources, undermining the Coastal Act's public access protections, and prioritizing private development over the public beach. This plan would permanently lock in beach erosion at Rockaway Beach and West Sharp Park and allow new development to rely on shoreline armoring in a high risk area.

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Sincerely,

Pieter Nelissen
pieter.nelissen@gmail.com, 470 46th avenue, San Francisco, CA, US, 94121

Honey, Julian@Coastal

From: Nathan Pierce <civicinput@newmode.io>
Sent: Monday, April 28, 2025 2:13 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

I urge you to reject the City of Pacifica's current draft of their Local Coastal Land Use Plan unless and until significant changes are made to bring the proposal into conformity with the Coastal Act. The plan's proposed Special Shoreline Resiliency Areas (SSRAs) would allow neighborhood-scale seawalls and redevelopment in hazardous, eroding areas—threatening public trust resources, undermining the Coastal Act's public access protections, and prioritizing private development over the public beach. This plan would permanently lock in beach erosion at Rockaway Beach and West Sharp Park and allow new development to rely on shoreline armoring in a high risk area.

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Sincerely,

Nathan Pierce
thenathanpierce@gmail.com, PO Box 5282, Richmond, CA, US, 94805

Honey, Julian@Coastal

From: Robyn Haste <civinput@newmode.io>
Sent: Monday, April 28, 2025 2:09 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

I urge you to reject the City of Pacifica's current draft of their Local Coastal Land Use Plan unless and until significant changes are made to bring the proposal into conformity with the Coastal Act. The plan's proposed Special Shoreline Resiliency Areas (SSRAs) would allow neighborhood-scale seawalls and redevelopment in hazardous, eroding areas—threatening public trust resources, undermining the Coastal Act's public access protections, and prioritizing private development over the public beach. This plan would permanently lock in beach erosion at Rockaway Beach and West Sharp Park and allow new development to rely on shoreline armoring in a high risk area.

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Sincerely,

Robyn Haste
r_haste@yahoo.com, 699 8th St, San Francisco, CA, US, 94103

Honey, Julian@Coastal

From: Olivia Angus <civicinput@newmode.io>
Sent: Monday, April 28, 2025 2:07 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

I urge you to reject the City of Pacifica's current draft of their Local Coastal Land Use Plan unless and until significant changes are made to bring the proposal into conformity with the Coastal Act. The plan's proposed Special Shoreline Resiliency Areas (SSRAs) would allow neighborhood-scale seawalls and redevelopment in hazardous, eroding areas—threatening public trust resources, undermining the Coastal Act's public access protections, and prioritizing private development over the public beach. This plan would permanently lock in beach erosion at Rockaway Beach and West Sharp Park and allow new development to rely on shoreline armoring in a high risk area.

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Sincerely,

Olivia Angus
msoliviaangus@gmail.com, 582 Sandalwood Drive, Livermore, CA, US, 94551

Honey, Julian@Coastal

From: STEVE WARD <civicinput@newmode.io>
Sent: Monday, April 28, 2025 2:04 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

I urge you to reject the City of Pacifica's current draft of their Local Coastal Land Use Plan unless and until significant changes are made to bring the proposal into conformity with the Coastal Act. The plan's proposed Special Shoreline Resiliency Areas (SSRAs) would allow neighborhood-scale seawalls and redevelopment in hazardous, eroding areas—threatening public trust resources, undermining the Coastal Act's public access protections, and prioritizing private development over the public beach. This plan would permanently lock in beach erosion at Rockaway Beach and West Sharp Park and allow new development to rely on shoreline armoring in a high risk area.

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Sincerely,

STEVE WARD
seaward94122@juno.com, 1556 GREAT HWY, SAN FRANCISCO, CA, US, 94122

Honey, Julian@Coastal

From: Sandy Commons <civiciinput@newmode.io>
Sent: Monday, April 28, 2025 2:03 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

I urge you to reject the City of Pacifica's current draft of their Local Coastal Land Use Plan unless and until significant changes are made to bring the proposal into conformity with the Coastal Act. The plan's proposed Special Shoreline Resiliency Areas (SSRAs) would allow neighborhood-scale seawalls and redevelopment in hazardous, eroding areas—threatening public trust resources, undermining the Coastal Act's public access protections, and prioritizing private development over the public beach. This plan would permanently lock in beach erosion at Rockaway Beach and West Sharp Park and allow new development to rely on shoreline armoring in a high risk area.

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Sincerely,

Sandy Commons
sandygatta454@gmail.com, 2701 Corabel Lane, Sacramento, CA, US, 95821

Honey, Julian@Coastal

From: Maxwell Jones <civicinput@newmode.io>
Sent: Monday, April 28, 2025 2:02 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

I urge you to reject the City of Pacifica's current draft of their Local Coastal Land Use Plan unless and until significant changes are made to bring the proposal into conformity with the Coastal Act. The plan's proposed Special Shoreline Resiliency Areas (SSRAs) would allow neighborhood-scale seawalls and redevelopment in hazardous, eroding areas—threatening public trust resources, undermining the Coastal Act's public access protections, and prioritizing private development over the public beach. This plan would permanently lock in beach erosion at Rockaway Beach and West Sharp Park and allow new development to rely on shoreline armoring in a high risk area.

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Sincerely,

Maxwell Jones
waverider143@yahoo.com, 630 Sea View Terrace, Watsonville, CA, US, 95076

Honey, Julian@Coastal

From: Kayla Moe <civiciinput@newmode.io>
Sent: Monday, April 28, 2025 1:56 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

I urge you to reject the City of Pacifica's current draft of their Local Coastal Land Use Plan unless and until significant changes are made to bring the proposal into conformity with the Coastal Act. The plan's proposed Special Shoreline Resiliency Areas (SSRAs) would allow neighborhood-scale seawalls and redevelopment in hazardous, eroding areas—threatening public trust resources, undermining the Coastal Act's public access protections, and prioritizing private development over the public beach. This plan would permanently lock in beach erosion at Rockaway Beach and West Sharp Park and allow new development to rely on shoreline armoring in a high risk area.

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Sincerely,

Kayla Moe
kaylamoe24@gmail.com, 87 Girard Ave, Sausalito, CA, US, 94965

Honey, Julian@Coastal

From: Janet Monfredini <civicinput@newmode.io>
Sent: Monday, April 28, 2025 1:56 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

The push to be so short sighted must stop! Once lost our pristine coastline will NEVER be recovered. Seawalls are contrary to common sense and will only result in damage and law suits.

I urge you to reject the City of Pacifica's current draft of their Local Coastal Land Use Plan unless and until significant changes are made to bring the proposal into conformity with the Coastal Act. The plan's proposed Special Shoreline Resiliency Areas (SSRAs) would allow neighborhood-scale seawalls and redevelopment in hazardous, eroding areas—threatening public trust resources, undermining the Coastal Act's public access protections, and prioritizing private development over the public beach. This plan would permanently lock in beach erosion at Rockaway Beach and West Sharp Park and allow new development to rely on shoreline armoring in a high risk area.

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Sincerely,

Janet Monfredini
janet@bridgessf.com, 130 Santa Monica Way, San Francisco, CA, US, 94127

Honey, Julian@Coastal

From: Karen Madsen <civicinput@newmode.io>
Sent: Monday, April 28, 2025 1:54 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

I urge you to reject the City of Pacifica's current draft of their Local Coastal Land Use Plan unless and until significant changes are made to bring the proposal into conformity with the Coastal Act. The plan's proposed Special Shoreline Resiliency Areas (SSRAs) would allow neighborhood-scale seawalls and redevelopment in hazardous, eroding areas—threatening public trust resources, undermining the Coastal Act's public access protections, and prioritizing private development over the public beach. This plan would permanently lock in beach erosion at Rockaway Beach and West Sharp Park and allow new development to rely on shoreline armoring in a high risk area.

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Sincerely,

Karen Madsen
kmadsen728@gmail.com, 1015 Tamarind Street, Montara, CA, US, 94037

Honey, Julian@Coastal

From: Elizabeth Levy <civicinput@newmode.io>
Sent: Monday, April 28, 2025 1:43 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

I urge you to reject the City of Pacifica's current draft of their Local Coastal Land Use Plan unless and until significant changes are made to bring the proposal into conformity with the Coastal Act. The plan's proposed Special Shoreline Resiliency Areas (SSRAs) would allow neighborhood-scale seawalls and redevelopment in hazardous, eroding areas—threatening public trust resources, undermining the Coastal Act's public access protections, and prioritizing private development over the public beach. This plan would permanently lock in beach erosion at Rockaway Beach and West Sharp Park and allow new development to rely on shoreline armoring in a high risk area.

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Sincerely,

Elizabeth Levy
bethy0543@att.net, 5815 Bernhard Ave. Lower Level, Richmond, CA, US, 94805

From: Kelly Andrews <civicinput@newmode.io>
Sent: Monday, April 28, 2025 1:40 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

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Sincerely,

Kelly Andrews
kellyandrews55@gmail.com, 1180 Peralta Rd, Pacifica, CA, US, 94044

Honey, Julian@Coastal

From: Brian Shah <civicinput@newmode.io>
Sent: Monday, April 28, 2025 1:35 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

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Sincerely,

Brian Shah
bashah@stanford.edu, 1035 Campus Drive, Stanford, CA, US, 94305

Honey, Julian@Coastal

From: Victor Carmichael <civiciput@newmode.io>
Sent: Monday, April 28, 2025 1:35 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

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Sincerely,

Victor Carmichael
vcarmichael@comcast.net, 5005 Palmetto Avenue, Pacifica, CA, US, 94044

Honey, Julian@Coastal

From: Kevin Branstetter <civicinput@newmode.io>
Sent: Monday, April 28, 2025 1:33 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

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Sincerely,

Kevin Branstetter
kevinbran@yahoo.com, 4613 Marshall Road, Garden Valley, CA, US, 95633

Honey, Julian@Coastal

From: JL Angell <civicinput@newmode.io>
Sent: Monday, April 28, 2025 1:33 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

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Sincerely,

JL Angell
jangell@earthlink.net, 2391 Ponderosa Rd, Rescue, CA, US, 95672

Honey, Julian@Coastal

From: Kaaren Wogen <civiciinput@newmode.io>
Sent: Monday, April 28, 2025 1:32 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

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Sincerely,

Kaaren Wogen
kdub420@yahoo.com, 7 Lakeshore Court, Richmond, CA, US, 94804

Honey, Julian@Coastal

From: Claire Mills <civinput@newmode.io>
Sent: Monday, April 28, 2025 1:26 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

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Please revise the plan to ensure:

- Reject the SSRA policies that would allow new development and redevelopment to rely on large-scale seawalls. No new development can rely on seawalls for future protection.
- Shoreline armoring is minimized and only allowed where absolutely necessary and in conformance with Coastal Act Sections 30235 and 30253 (e.g., when designed to eliminate or mitigate adverse impacts on local shoreline sand supply).
- Public beach loss is fully mitigated with real, on-the-ground projects and conditions that create and restore beach and coastal habitat (e.g., removal of structures encroaching on public trust property)—not just fees, park benches and trails align the coast.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,

Claire Mills
clarable@yahoo.com, 2820 Greenwich St. , San Francisco, CA, US, 94123

Honey, Julian@Coastal

From: Richard Perry <civicinput@newmode.io>
Sent: Monday, April 28, 2025 1:26 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

I urge you to reject the City of Pacifica's current draft of their Local Coastal Land Use Plan unless and until significant changes are made to bring the proposal into conformity with the Coastal Act. The plan's proposed Special Shoreline Resiliency Areas (SSRAs) would allow neighborhood-scale seawalls and redevelopment in hazardous, eroding areas—threatening public trust resources, undermining the Coastal Act's public access protections, and prioritizing private development over the public beach. This plan would permanently lock in beach erosion at Rockaway Beach and West Sharp Park and allow new development to rely on shoreline armoring in a high risk area.

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Sincerely,

Richard Perry
rescue8@gmail.com, 1300 Page Street, San Francisco, CA, US, 94117

Honey, Julian@Coastal

From: Faye Pineda <civiciinput@newmode.io>
Sent: Monday, April 28, 2025 1:25 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

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Sincerely,

Faye Pineda
beetle1731@gmail.com, 501 19th Street Northeast, Cedar Rapids, IA, US, 52402

Honey, Julian@Coastal

From: Jeanene Taylor <civiciinput@newmode.io>
Sent: Monday, April 28, 2025 1:22 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

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Sincerely,

Jeanene Taylor
jeanenebentley@gmail.com, 121 Oxford Way, 415-205-3758, CA, US, 95060

Honey, Julian@Coastal

From: Leslie Fiedler <civicinput@newmode.io>
Sent: Monday, April 28, 2025 1:22 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

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Sincerely,

Leslie Fiedler
ljf.action@gmail.com, 809 Lathrop Dr, Stanford, CA, US, 94305

Honey, Julian@Coastal

From: Craig Hanson <civicinput@newmode.io>
Sent: Monday, April 28, 2025 1:22 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

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Sincerely,

Craig Hanson
fishingcraig@gmail.com, 35 THOMAS DR. APT 5, Mill Valley, CA, US, 94941

Honey, Julian@Coastal

From: Tracy Rogers <civicinput@newmode.io>
Sent: Monday, April 28, 2025 1:19 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

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Sincerely,

Tracy Rogers
tracy@mellam.org, 991 Stony Hill Road, Redwood City, CA, US, 94061

Honey, Julian@Coastal

From: Juliet S Pearson <civicinput@newmode.io>
Sent: Monday, April 28, 2025 1:14 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

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Sincerely,

Juliet S Pearson
julietjohns@mac.com, 19368 Tiger Tail Road, Grass Valley, CA, US, 95949

Honey, Julian@Coastal

From: Hannah Lutz <civicinput@newmode.io>
Sent: Monday, April 28, 2025 1:14 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

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Sincerely,

Hannah Lutz
hannahlutz@gmail.com, 1468 La Playa Street, San Francisco, CA, US, 94122

Honey, Julian@Coastal

From: Jo Ann Carter <civicinput@newmode.io>
Sent: Monday, April 28, 2025 1:13 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

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Sincerely,

Jo Ann Carter
jcarter@vicisano.net, 1070 Grizzly Peak Boulevard, Berkeley, CA, US, 94708

Honey, Julian@Coastal

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Sincerely,

Jo Ann Carter
jcarter@vicisano.net, 1070 Grizzly Peak Boulevard, Berkeley, CA, US, 94708

Honey, Julian@Coastal

From: Blair Jeffris <civinput@newmode.io>
Sent: Monday, April 28, 2025 1:13 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

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Sincerely,

Blair Jeffris
bjeffris@gmail.com, 1224 Arguello Boulevard, San Francisco, CA, US, 94122

Honey, Julian@Coastal

From: Lissa Parker <civiciinput@newmode.io>
Sent: Monday, April 28, 2025 1:12 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

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Sincerely,

Lissa Parker
lissarp@toast.net, 3811 Lakeside Drive, Apt. D104, Richmond, CA, CA, US, 94806

Honey, Julian@Coastal

From: Terry Lewis <civinput@newmode.io>
Sent: Monday, April 28, 2025 1:12 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

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Sincerely,

Terry Lewis
peechareno@yahoo.com, 3060 Porter St. #9, Soquel, CA, US, 95073

Honey, Julian@Coastal

From: Terry Lewis <civicinput@newmode.io>
Sent: Monday, April 28, 2025 1:12 PM
To: NorthCentralCoast@Coastal
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Sincerely,

Terry Lewis
peechareno@yahoo.com, 3060 Porter St. #9, Soquel, CA, US, 95073

Honey, Julian@Coastal

From: Robert Memmo <civinput@newmode.io>
Sent: Monday, April 28, 2025 1:10 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

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Sincerely,

Robert Memmo
rmemmo@gmail.com, 454 Moraga Way, Orinda, CA, US, 94563

Honey, Julian@Coastal

From: Rob Baedeker <civicinput@newmode.io>
Sent: Monday, April 28, 2025 1:10 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

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Sincerely,

Rob Baedeker
rob.baedeker@gmail.com, 5807 Colton Boulevard, Oakland, CA, US, 94611

Honey, Julian@Coastal

From: Elizabeth Lougee <civicinput@newmode.io>
Sent: Monday, April 28, 2025 1:08 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

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Sincerely,

Elizabeth Lougee
lisalougee@yahoo.com, 54 5th Ave., San Francisco, CA, US, 94118

Honey, Julian@Coastal

From: Thompson Owen <civiciinput@newmode.io>
Sent: Monday, April 28, 2025 1:08 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

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- Shoreline armoring is minimized and only allowed where absolutely necessary and in conformance with Coastal Act Sections 30235 and 30253 (e.g., when designed to eliminate or mitigate adverse impacts on local shoreline sand supply).
- Public beach loss is fully mitigated with real, on-the-ground projects and conditions that create and restore beach and coastal habitat (e.g., removal of structures encroaching on public trust property)—not just fees, park benches and trails align the coast.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,

Thompson Owen
sweetmarias@gmail.com, 752 Cordova Court, Pacifica, CA, US, 94044

Honey, Julian@Coastal

From: Susan McMahon-Dyogi <civiciinput@newmode.io>
Sent: Monday, April 28, 2025 1:06 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

I urge you to reject the City of Pacifica's current draft of their Local Coastal Land Use Plan unless and until significant changes are made to bring the proposal into conformity with the Coastal Act. The plan's proposed Special Shoreline Resiliency Areas (SSRAs) would allow neighborhood-scale seawalls and redevelopment in hazardous, eroding areas—threatening public trust resources, undermining the Coastal Act's public access protections, and prioritizing private development over the public beach. This plan would permanently lock in beach erosion at Rockaway Beach and West Sharp Park and allow new development to rely on shoreline armoring in a high risk area.

Please revise the plan to ensure:

- Reject the SSRA policies that would allow new development and redevelopment to rely on large-scale seawalls. No new development can rely on seawalls for future protection.
- Shoreline armoring is minimized and only allowed where absolutely necessary and in conformance with Coastal Act Sections 30235 and 30253 (e.g., when designed to eliminate or mitigate adverse impacts on local shoreline sand supply).
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Sincerely,

Susan McMahon-Dyogi
faithsmom1495@yahoo.com, 1495 Linda Mar Boulevard, Pacifica, CA, US, 94044

Honey, Julian@Coastal

From: Karen Downing <civinput@newmode.io>
Sent: Monday, April 28, 2025 1:06 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

I urge you to reject the City of Pacifica's current draft of their Local Coastal Land Use Plan unless and until significant changes are made to bring the proposal into conformity with the Coastal Act. The plan's proposed Special Shoreline Resiliency Areas (SSRAs) would allow neighborhood-scale seawalls and redevelopment in hazardous, eroding areas—threatening public trust resources, undermining the Coastal Act's public access protections, and prioritizing private development over the public beach. This plan would permanently lock in beach erosion at Rockaway Beach and West Sharp Park and allow new development to rely on shoreline armoring in a high risk area.

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Sincerely,

Karen Downing
hsunhsun_us@yahoo.com, 4784 Creekwood Drive, Fremont, CA, US, 94555

Honey, Julian@Coastal

From: Erica Stanojevic <civinput@newmode.io>
Sent: Monday, April 28, 2025 1:04 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

I urge you to reject the City of Pacifica's current draft of their Local Coastal Land Use Plan unless and until significant changes are made to bring the proposal into conformity with the Coastal Act. The plan's proposed Special Shoreline Resiliency Areas (SSRAs) would allow neighborhood-scale seawalls and redevelopment in hazardous, eroding areas—threatening public trust resources, undermining the Coastal Act's public access protections, and prioritizing private development over the public beach. This plan would permanently lock in beach erosion at Rockaway Beach and West Sharp Park and allow new development to rely on shoreline armoring in a high risk area.

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Sincerely,

Erica Stanojevic
ericast@gmail.com, 2317 Vine Hill Road, Santa Cruz, CA, US, 95065

Honey, Julian@Coastal

From: Claire Baszucki <civiciput@newmode.io>
Sent: Monday, April 28, 2025 1:02 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

I urge you to reject the City of Pacifica's current draft of their Local Coastal Land Use Plan unless and until significant changes are made to bring the proposal into conformity with the Coastal Act. The plan's proposed Special Shoreline Resiliency Areas (SSRAs) would allow neighborhood-scale seawalls and redevelopment in hazardous, eroding areas—threatening public trust resources, undermining the Coastal Act's public access protections, and prioritizing private development over the public beach. This plan would permanently lock in beach erosion at Rockaway Beach and West Sharp Park and allow new development to rely on shoreline armoring in a high risk area.

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Sincerely,

Claire Baszucki
clairebaszucki@gmail.com, 627 Frederick Street, San Francisco, CA, US, 94117

Honey, Julian@Coastal

From: Matthew Shippee <civiciinput@newmode.io>
Sent: Monday, April 28, 2025 1:02 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

I urge you to reject the City of Pacifica's current draft of their Local Coastal Land Use Plan unless and until significant changes are made to bring the proposal into conformity with the Coastal Act. The plan's proposed Special Shoreline Resiliency Areas (SSRAs) would allow neighborhood-scale seawalls and redevelopment in hazardous, eroding areas—threatening public trust resources, undermining the Coastal Act's public access protections, and prioritizing private development over the public beach. This plan would permanently lock in beach erosion at Rockaway Beach and West Sharp Park and allow new development to rely on shoreline armoring in a high risk area.

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Sincerely,

Matthew Shippee
matthewshippee@gmail.com, 1449 Page St, San Francisco, CA, US, 94117

Honey, Julian@Coastal

From: Judi Walters <civicinput@newmode.io>
Sent: Monday, April 28, 2025 1:02 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

I urge you to reject the City of Pacifica's current draft of their Local Coastal Land Use Plan unless and until significant changes are made to bring the proposal into conformity with the Coastal Act. The plan's proposed Special Shoreline Resiliency Areas (SSRAs) would allow neighborhood-scale seawalls and redevelopment in hazardous, eroding areas—threatening public trust resources, undermining the Coastal Act's public access protections, and prioritizing private development over the public beach. This plan would permanently lock in beach erosion at Rockaway Beach and West Sharp Park and allow new development to rely on shoreline armoring in a high risk area.

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Sincerely,

Judi Walters
judiwalters@sbcglobal.net, 71 Devonshire Circle, San Carlos, CA, US, 94070

Honey, Julian@Coastal

From: Adelae Esposito <civinput@newmode.io>
Sent: Monday, April 28, 2025 1:02 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

I urge you to reject the City of Pacifica's current draft of their Local Coastal Land Use Plan unless and until significant changes are made to bring the proposal into conformity with the Coastal Act. The plan's proposed Special Shoreline Resiliency Areas (SSRAs) would allow neighborhood-scale seawalls and redevelopment in hazardous, eroding areas—threatening public trust resources, undermining the Coastal Act's public access protections, and prioritizing private development over the public beach. This plan would permanently lock in beach erosion at Rockaway Beach and West Sharp Park and allow new development to rely on shoreline armoring in a high risk area.

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Sincerely,

Adelae Esposito
aesposito1108@icloud.com, 899 Green St, San Francisco, CA, US, 94133

Honey, Julian@Coastal

From: Nancy Lince <civicinput@newmode.io>
Sent: Monday, April 28, 2025 1:01 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

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Sincerely,

Nancy Lince
nlince@linceconsulting.com, 25629 Crestfield Circle, Castro Valley, CA, US, 94552

Honey, Julian@Coastal

From: Michael Kavanaugh <civicinput@newmode.io>
Sent: Monday, April 28, 2025 12:58 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

I urge you to reject the City of Pacifica's current draft of their Local Coastal Land Use Plan unless and until significant changes are made to bring the proposal into conformity with the Coastal Act. The plan's proposed Special Shoreline Resiliency Areas (SSRAs) would allow neighborhood-scale seawalls and redevelopment in hazardous, eroding areas—threatening public trust resources, undermining the Coastal Act's public access protections, and prioritizing private development over the public beach. This plan would permanently lock in beach erosion at Rockaway Beach and West Sharp Park and allow new development to rely on shoreline armoring in a high risk area.

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Sincerely,

Michael Kavanaugh
mkavanau@yahoo.com, 1954 23rd Ave, San Francisco, CA, US, 94116

Honey, Julian@Coastal

From: Sara Bogart <civicinput@newmode.io>
Sent: Monday, April 28, 2025 12:56 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

I urge you to reject the City of Pacifica's current draft of their Local Coastal Land Use Plan unless and until significant changes are made to bring the proposal into conformity with the Coastal Act. The plan's proposed Special Shoreline Resiliency Areas (SSRAs) would allow neighborhood-scale seawalls and redevelopment in hazardous, eroding areas—threatening public trust resources, undermining the Coastal Act's public access protections, and prioritizing private development over the public beach. This plan would permanently lock in beach erosion at Rockaway Beach and West Sharp Park and allow new development to rely on shoreline armoring in a high risk area.

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Sincerely,

Sara Bogart
Bogartsara@gmail.com, 62 East 39th Avenue, San Mateo, CA, US, 94403

Honey, Julian@Coastal

From: Nona Weiner <civicinput@newmode.io>
Sent: Monday, April 28, 2025 12:56 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

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I urge you to reject the City of Pacifica's current draft of their Local Coastal Land Use Plan unless and until significant changes are made to bring the proposal into conformity with the Coastal Act. The plan's proposed Special Shoreline Resiliency Areas (SSRAs) would allow neighborhood-scale seawalls and redevelopment in hazardous, eroding areas—threatening public trust resources, undermining the Coastal Act's public access protections, and prioritizing private development over the public beach. This plan would permanently lock in beach erosion at Rockaway Beach and West Sharp Park and allow new development to rely on shoreline armoring in a high risk area.

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Sincerely,

Nona Weiner
nonaweiner@yahoo.com, 14238 Lucian Avenue, San Jose, CA, US, 95127

Honey, Julian@Coastal

From: Bryonny Williams <civicinput@newmode.io>
Sent: Monday, April 28, 2025 12:56 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

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Sincerely,

Bryonny Williams
bryonny@hotmail.com, 1995 Pomar Way, Walnut Creek, CA, US, 94598

Honey, Julian@Coastal

From: Marci Spencer <civicinput@newmode.io>
Sent: Monday, April 28, 2025 12:56 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

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Sincerely,

Marci Spencer
Horatio3333@comcast.net, 18910 crest ave, castro valley, CA, US, 94546

Honey, Julian@Coastal

From: Samuel Casillas <civinput@newmode.io>
Sent: Monday, April 28, 2025 12:51 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

I urge you to reject the City of Pacifica's current draft of their Local Coastal Land Use Plan unless and until significant changes are made to bring the proposal into conformity with the Coastal Act. The plan's proposed Special Shoreline Resiliency Areas (SSRAs) would allow neighborhood-scale seawalls and redevelopment in hazardous, eroding areas—threatening public trust resources, undermining the Coastal Act's public access protections, and prioritizing private development over the public beach. This plan would permanently lock in beach erosion at Rockaway Beach and West Sharp Park and allow new development to rely on shoreline armoring in a high risk area.

Please revise the plan to ensure:

- Reject the SSRA policies that would allow new development and redevelopment to rely on large-scale seawalls. No new development can rely on seawalls for future protection.
- Shoreline armoring is not considered until all nature based solutions are considered, studied and implemented
- Public beach loss is fully mitigated with real, on-the-ground projects and conditions that create and restore beach and coastal habitat (e.g., removal of structures encroaching on public trust property)—not just fees, park benches and trails align the coast.

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Sincerely,

Samuel Casillas
samuelcasillas@hotmail.com, 135 Stanley ave , Pacifica , CA, US, 94044

Honey, Julian@Coastal

From: Gary Cordeiro <civicinput@newmode.io>
Sent: Monday, April 28, 2025 12:50 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

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Sincerely,

Gary Cordeiro
mpi50@yahoo.com, 4780 Knarlwood , Oakley , CA, US, 94561

Honey, Julian@Coastal

From: Howard Cohen <civicinput@newmode.io>
Sent: Monday, April 28, 2025 12:50 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

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Sincerely,

Howard Cohen
howard@cohensw.com, 3272 Cowper Street, Palo Alto, CA, US, 94306

Honey, Julian@Coastal

From: Ricky TWIST <civiciinput@newmode.io>
Sent: Monday, April 28, 2025 12:50 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

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Sincerely,

Ricky TWIST
rickytwist@aol.com, 11060 BANNER MINE WAY NEVADA CITY CA, Nevada City, CA, US, 95959

Honey, Julian@Coastal

From: Ashley Gray <civicinput@newmode.io>
Sent: Monday, April 28, 2025 12:50 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

I urge you to reject the City of Pacifica's current draft of their Local Coastal Land Use Plan unless and until significant changes are made to bring the proposal into conformity with the Coastal Act. The plan's proposed Special Shoreline Resiliency Areas (SSRAs) would allow neighborhood-scale seawalls and redevelopment in hazardous, eroding areas—threatening public trust resources, undermining the Coastal Act's public access protections, and prioritizing private development over the public beach. This plan would permanently lock in beach erosion at Rockaway Beach and West Sharp Park and allow new development to rely on shoreline armoring in a high risk area.

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Sincerely,

Ashley Gray
agrayssfhs@yahoo.com, 761 Franklin Street, Montara, CA, US, 94037

Honey, Julian@Coastal

From: John Rizzi <civicinput@newmode.io>
Sent: Monday, April 28, 2025 12:46 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

I urge you to reject the City of Pacifica's current draft of their Local Coastal Land Use Plan unless and until significant changes are made to bring the proposal into conformity with the Coastal Act. The plan's proposed Special Shoreline Resiliency Areas (SSRAs) would allow neighborhood-scale seawalls and redevelopment in hazardous, eroding areas—threatening public trust resources, undermining the Coastal Act's public access protections, and prioritizing private development over the public beach. This plan would permanently lock in beach erosion at Rockaway Beach and West Sharp Park and allow new development to rely on shoreline armoring in a high risk area.

Please revise the plan to ensure:

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- Public beach loss is fully mitigated with real, on-the-ground projects and conditions that create and restore beach and coastal habitat (e.g., removal of structures encroaching on public trust property)—not just fees, park benches and trails align the coast.

Pacifica deserves a coastal plan that protects its beaches and waves – and the public's right to access them. Please stand up for the coast and future generations.

Sincerely,

John Rizzi
magictripp@sbcglobal.net, 590 Nicasio Way, Soquel, CA, US, 95073-9782

Honey, Julian@Coastal

From: Steve Steele <civicinput@newmode.io>
Sent: Monday, April 28, 2025 12:45 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

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Sincerely,

Steve Steele
scsteele33@gmail.com, 970 Haddock Street, Foster City, CA, US, 94404

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Sent: Monday, April 28, 2025 12:45 PM
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Steve Steele
scsteele33@gmail.com, 970 Haddock Street, Foster City, CA, US, 94404

Honey, Julian@Coastal

From: Jason Kambak <civinput@newmode.io>
Sent: Monday, April 28, 2025 12:44 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

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Sincerely,

Jason Kambak
kambay1@mac.com, 3445 Lawton Street, San Francisco, CA, US, 94122

Honey, Julian@Coastal

From: Michael Tomczyszyn <civicinput@newmode.io>
Sent: Monday, April 28, 2025 12:44 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

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Sincerely,

Michael Tomczyszyn
mtomczyszyn@hotmail.com, 243 Ramsell Street, San Francisco, CA, US, 94132

Honey, Julian@Coastal

From: Samuel Casillas <civicinput@newmode.io>
Sent: Friday, May 2, 2025 1:11 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

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Sincerely,

Samuel Casillas
samuelcasillas650@gmail.com, 135 Stanley Avenue, Pacifica, CA, US, 94044

Honey, Julian@Coastal

From: Kendra Knight <civicinput@newmode.io>
Sent: Thursday, May 1, 2025 11:04 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

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Sincerely,

Kendra Knight
kcdknight@yahoo.com, 1301 Sanchez , Burlingame , CA, US, 94010

Honey, Julian@Coastal

From: Danny Estrella <civicinput@newmode.io>
Sent: Thursday, May 1, 2025 8:18 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

Dear Chair Cummings & Commissioners,

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Sincerely,

Danny Estrella
warnella@hotmail.com, 114 Kent Road, Pacifica, PR, US, 94044

Honey, Julian@Coastal

From: Danny Estrella <civicinput@newmode.io>
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Sincerely,

Danny Estrella
warnella@hotmail.com, 114 Kent Road, Pacifica, PR, US, 94044

Honey, Julian@Coastal

From: Lyla Reinero <civicinput@newmode.io>
Sent: Thursday, May 1, 2025 6:32 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

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Sincerely,

Lyla Reinero
lyla.reinero@gmail.com, 1531 Grand Ave, Pacifica, CA, US, 94044

Honey, Julian@Coastal

From: Vincent Meade <civicinput@newmode.io>
Sent: Thursday, May 1, 2025 2:30 PM
To: NorthCentralCoast@Coastal
Subject: Don't Let Seawalls Destroy Pacifica's Beaches and Waves

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Sincerely,

Vincent Meade
meadevincentd@gmail.com, 517 Walnut Avenue, Santa Cruz, CA, US, 95060

From: Adam Libert <adam.libert@gmail.com>

Sent: Friday, May 2, 2025 4:47 PM

To: ExecutiveStaff@Coastal <ExecutiveStaff@coastal.ca.gov>

Subject: Public Comment on May 2025 Agenda Item Wednesday 9 - Deputy Director's Report

Given the urgent threat of structural failure and wave overtopping at the Beach Blvd seawall, I strongly support the City's project if the following **special condition of approval** be added:

Require study and funding for an offshore artificial reef, such as the one proposed to City Council on 4/29/25. This reef would:

1. Extend the life of the seawall
2. Reduce wave overtopping and protect nearby homes
3. Lower long-term sand replenishment costs
4. Support a wider, safer recreational beach
5. Restore ecosystem services (wave dissipation, public access, recreation, ecology)
6. Create habitat for kelp, fish, and birds

This concept — similar to efforts underway in Oceanside, CA — should be pursued diligently and with funding support from county, state, and/or federal agencies.

Alternatively, this should be added as a LUP/IP element of the LCP / adaptation plan.

— Adam