

# **Public Comments**

## **Agenda Item 2**

Written Comments Received By 12pm on 7/11/2022



*July 11, 2022*  
*City Council Special Meeting*

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**From:** Christine Boles [REDACTED]  
**Sent:** Sunday, July 10, 2022 12:36 PM  
**To:** \_City Council Group; Christine Boles; Public Comment; Mark Hubbell; Murdock, Christian  
**Cc:** Woodhouse, Kevin; Berman, Lauren; Hauser, Samantha; Leal, David; Ferguson, Alex; Godwin, James; Domurat, George; Wright, Greg; Coffey, Sarah  
**Subject:** Tomorrow's appeal of the General Plan  
**Attachments:** 4. Email with Dr. Frost 6.27.22.eml; Christine Boles General Plan Appeal Letter to City Council 7.10.22.pdf

**[CAUTION: External Email]**

Dear City Council members and Mr. Murdock,  
Please find attached further information detailing the reasons for our appeal of the Planning Commission's approval of the General Plan.

Let me know if you have any questions and we look forward to our presentation tomorrow evening.

Sarah, we're still working on the PowerPoint presentation, but I will send that to you before noon tomorrow.

Thank you,

Christine Boles, Architect

**Beausoleil Architects**

[REDACTED]

Pacifica, CA 94044

[REDACTED]

[www.beausoleil-architects.com](http://www.beausoleil-architects.com)

*"Do your little bit of good where you are; it's those little bits of good put together that overwhelm the world." - Desmond Tutu*

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

**From:** Frost, Erik@DOC  
**To:** Christine [REDACTED]  
**Subject:** RE: one more quick question about Pacifica's new landslide map  
**Date:** Monday, June 27, 2022 11:32:17 AM

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Hi Christine,

We provided data so that the City's landslide inventory map mirrored the landslide inventories presented in our Seismic Hazard Zone Reports (SHZR) for Montara Mountain and San Francisco South. The sources and procedures for generating those inventories are available in the reports, which can be found here:

<https://maps.conservation.ca.gov/cgs/informationwarehouse/index.html?map=regulatorymaps>

We do have a website where we collect public reports of landsliding (and members of the public can reach out to us to have information added). I think this website may have been set up shortly after that landslide occurred, so it might not be listed there.

<https://cadoc.maps.arcgis.com/apps/webappviewer/index.html?id=bc48ad40e3504134a1fc8f3909659041>

Without knowing anything about this particular landslide, I can't really comment on why it's not included in the inventories from our SHZR. But I would encourage you to reach out to the people who operate that recent landslide website so it can be added there.

Erik

### **Dr. Erik Frost**

Senior Engineering Geologist | Seismic Hazards Program

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**From:** Christine Boles [REDACTED]  
**Sent:** Sunday, June 26, 2022 9:04 PM  
**To:** Frost, Erik@DOC <Erik.Frost@conservation.ca.gov>  
**Subject:** one more quick question about Pacifica's new landslide map

Good afternoon Dr. Frost,

I'm sorry to bother you again, but I just have one more quick question. Pacifica Planning staff prepared a new landslide map for the General Plan, supposedly with a new data set from you. I've attached the most recent version presented at the City Council meeting this Saturday.

I'm trying to understand where this data comes from and what it represents as some known landslides are missing, including a fairly major one on January 8, 2017 on Highway 1 near Reina del Mar. I've marked it in green on the attached map. This caused lanes of traffic to be blocked for about 18 hours. <https://www.kron4.com/news/landslide-closes-nb-hwy-1-in-pacifica/>

How does the Department of Conservation obtain new data - is it the municipalities' responsibility to report them?

I really appreciate any clarification you can give me. Thank you!

Christine Boles, Architect

**Beausoleil Architects**



Pacifica, CA 94044



[www.beausoleil-architects.com](http://www.beausoleil-architects.com)

*“Do your little bit of good where you are; it's those little bits of good put together that overwhelm the world.” -  
Desmond Tutu*



DATE: July 10, 2022

TO: Mayor Bier  
Mayor Pro-Tempore Bigstyk  
City Council Members Beckmeyer, O'Neill, and Vaterlaus



RE: Appeal of Planning Commission approval of City of Pacifica General Plan and FEIR

Dear Honorable Mayor Bier, Mayor Pro-Tem Bigstyk, and Council Members Beckmeyer, O'Neill and Vaterlaus,

While there are a few items that I do feel have yet been properly analyzed or reviewed in the General Plan, the focus of our appeal on Monday is the Safety Element, especially related to landslide, fire and evacuation issues. We believe that with a few minor adjustments to the maps and text in the General Plan, these can easily be fixed. That is our ask, to send this specific section of the General Plan back to the Planning Commission so these critical issues of public safety can be fixed. My understanding from speaking with a friend who is long time planning director in California is that you are allowed to approve certain sections of the General Plan, while other sections can be pulled for edits. We are currently working this way with our LCLUP, and I have been told by a member of the Housing Leadership Council that the Land Use Plan will need to be updated as part of the Housing Element later this year.

The staff report says several times that "Appellants have not provided evidence or explanation of the claims made about the FEIR in this basis for the Appeal. All EIRs, **including** a program EIR, must evaluate the reasonably foreseeable direct, indirect, and cumulative impacts on the physical environment that would result from a project."

I agree with the second sentence, but not the first. I and others have written many letters and emails over the past 6 months that are in the record that specifically provide evidence and explanation of our claims.

My responses to the staff report's analysis of the specific items in the appeal are as follows:

**I. Basis 1 (starting on packet page 8).**

We understand that a Program EIR is required and that it does not necessitate site specific analysis. We do however contend that certain sections of the EIR are incomplete in their analysis to establish a baseline to be able to analyze then mitigate significant environmental impacts. CEQA Guideline 15125(c) requires that an EIR present an accurate and complete description of the environmental setting in the vicinity of the project as it existed before commencement of the project. The environmental setting must be sufficiently comprehensive to allow the impacts "to be considered in the full environmental context."

For example, in terms of traffic, the staff report acknowledges on packet page 10 that *"impacts to Transportation would be significant and unavoidable due to the increase in vehicle miles traveled (VMT) that would result from adoption of the GPU. Although Transportation impacts would be significant and unavoidable, CEQA still requires the imposition of mitigation measures to reduce potential impacts to the maximum extent feasible."* The analysis in the EIR does not seem to comply with Government Code Section 65302(b), ie. it does not address all existing thoroughfares and it does not meet the needs of all users to provide a balanced and safe network. The code also calls for the circulation element to be aligned with the land use element - all land use changes must be accounted for in the circulation element - Sharp Park, Pedro Point, growth from planned Economic Sustainability goals (tourism and shopping). The code also requires identification of funding for identified infrastructure improvements, and yet there is no information on funding for complete streets, etc. in the EIR or General Plan.

The impacts of the projected growth (990 new units) in the General Plan on traffic will indeed be significant, and doubly so when we finally incorporate the 1892 RHNA (Regional Housing Needs Allocation) numbers, but the impacts are not necessarily unavoidable. I would suggest you reread the letters from the Bay Area Air Quality Management District, the letters from Vicki Sundstrom (a licensed traffic engineer), the letters from Rick Nahass who is very passionate about working towards public transportation solutions. Rick also alerted you to a \$100,000 grant for a better traffic study last year that specifically mentioned Pacifica, but for which unfortunately the city did not apply. Once we can identify our problem areas with more robust data, we can identify other potential solutions, and we will then have the information needed to apply for transportation grants to fix the problems. CEQA also requires us to demonstrate a good faith effort and use substantial evidence to justify our mitigation analysis and conclusions. Beyond the identified Manor overcrossing project, there is a lot more we can and should do to mitigate the impacts of traffic that are not identified in the EIR. And our traffic issues directly affect our ability to evacuate in an emergency.

Assembly Bill (AB) 747, passed in August of 2019, requires municipalities to update the Safety Element of their General Plan to identify evacuation routes and assess the capacity, safety, and viability of those routes under a range of emergency scenarios. I have not seen this analysis in the EIR or General Plan.

## **II. Basis 2 (packet page 11).**

This is the main point of our appeal. Again, CEQA Guideline 15125(c) requires that an EIR present an accurate and complete description of the environmental setting in the vicinity of the project as it existed before commencement of the project. The environmental setting must be sufficiently comprehensive to allow the impacts “to be considered in the full environmental context.” CEQA requires the use of “best available data”, not just convenient partial data that happens to be in an easy format to incorporate in an electronic map.

Again, the staff report claims that “*Appellants have not provided evidence or explanation of the claims made about the FEIR in this basis for the Appeal.*” And yet the record is full of my letters on these very topics, especially related to landslides and fire.

### **A. Landslides**

At the planning commission hearing on June 11<sup>th</sup> where they approved the General Plan, staff admitted that the landslide maps in the agenda were incorrect and that they were reviewing and modifying them with input from Dr. Erik Frost of the Department of Conservation. These modifications were triggered by my email conversation with Dr. Frost, documented in my comment letter B dated 6.5.22<sup>1</sup>

**The Planning Commission approved the General Plan without ever having seen these new maps! That is reason alone to send this portion of the General Plan back to the Planning Commission. Chair Berman is a licensed civil engineer and should be able to review these maps better than anyone currently on Council.**

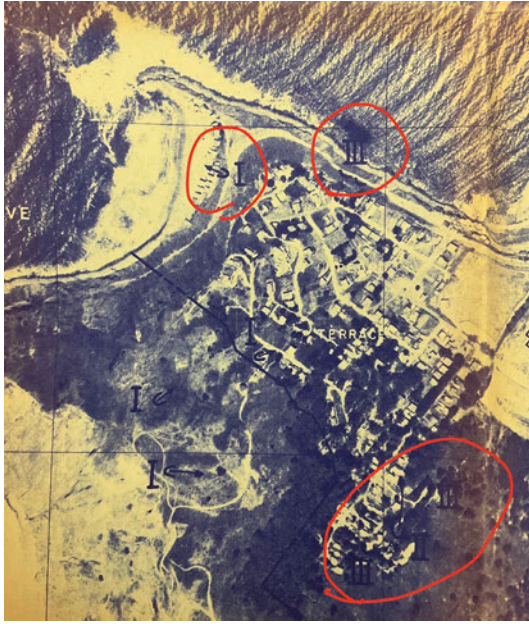
These maps, that were later included in the packet the City Council reviewed on June 25, 2022, still contain major omissions and are not consistent with data the City of Pacifica has in its’ own records. Here are a couple of examples.

**Example 1.** The 1983 Howard Donley Report<sup>2</sup>, prepared after the devastating landslides of 1982 includes mapping of all 475 slides that occurred that year. Here is an example page showing a detail the Pedro Point Area.

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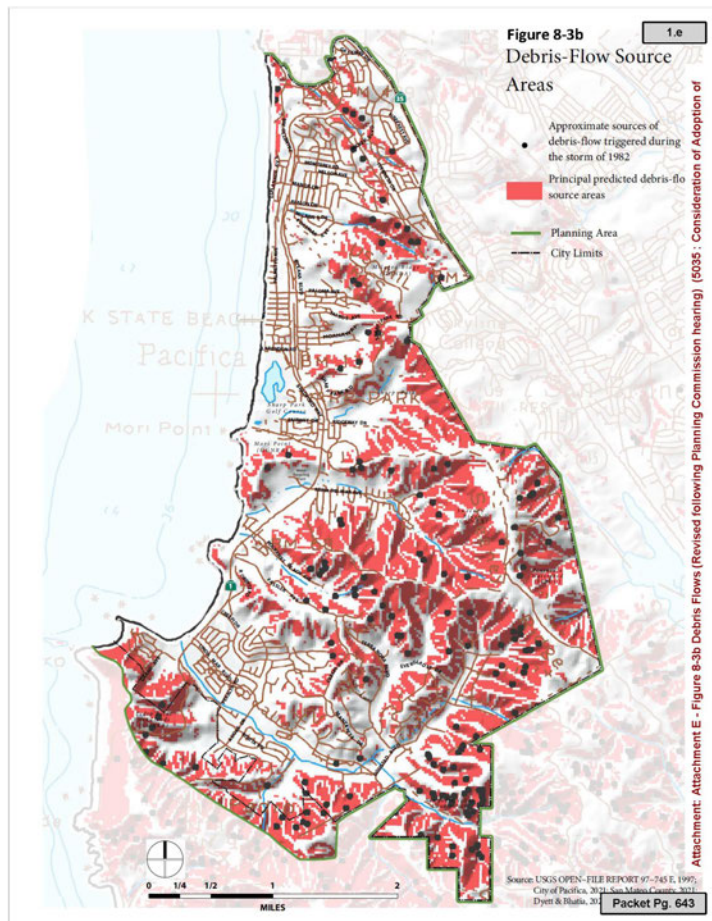
<sup>1</sup> 6.5.22 Christine Boles Comment letter B, dated 6.5.22

<sup>2</sup> 1983 HDAI report and maps



The new Landslide map in Figure 8-3B that supposedly maps the landslides of 1982 is missing all 5 of these landslides circled in red.

To meet the CEQA requirements of accurate and complete information, I would request that Figure 8-3b be reviewed and more back dots added so that all the documented landslides in this data set from city records is incorporated. I am happy to offer to assist staff with this work, which could be done in less than a day.



## 1. Example 2

On January 8, 2017, Pacifica experienced a major landslide that forced the closure of lanes on Highway 1 for about 18 hours. Then City Manager Laurie Tinfow sent an email<sup>3</sup> to Mr. Murdock about this slide, which I just obtained from a PRA request on Friday. She wrote, *“Hello Christian, During my time with the City of Pacifica, I have come to realize that here, “winter storms” have an entirely different meaning than in many other places! The storms that have battered us since last Friday created some special challenges and I want to highlight a few of them.*

### ***Highway 1 Landslide***

*Late Sunday night, a landslide on Highway 1 at Shelldance forced closure of the northbound lanes. The Police Department rerouted all traffic onto the southbound lanes in alternate groups of cars. By 7:30 a.m. Monday morning Caltrans equipment was on-site, removing the material and cleaning up. Caltrans’ geotechnical staff reviewed the site later that morning. By early evening, all lanes were open and traffic was moving freely. Tuesday’s morning commute flowed normally.*

...(see full email with other interesting information about sinkholes, trees falling and destroying a home, and other damage from the storm)

*I wish us all a safe weekend, free from landslides, sink holes and falling trees!*

*Best,*

**LORIE TINFOW**

*City Manager*

I was surprised that this major recent landslide was not included on the other new map Figure 8-X, so I contacted Dr. Erik Frost again to try to understand the sources of information for this document, see attached. Apparently, state agencies do not have eagle eyes to be able to document every major landslide that occurs. It is our responsibility to report these events so they can be officially mapped.

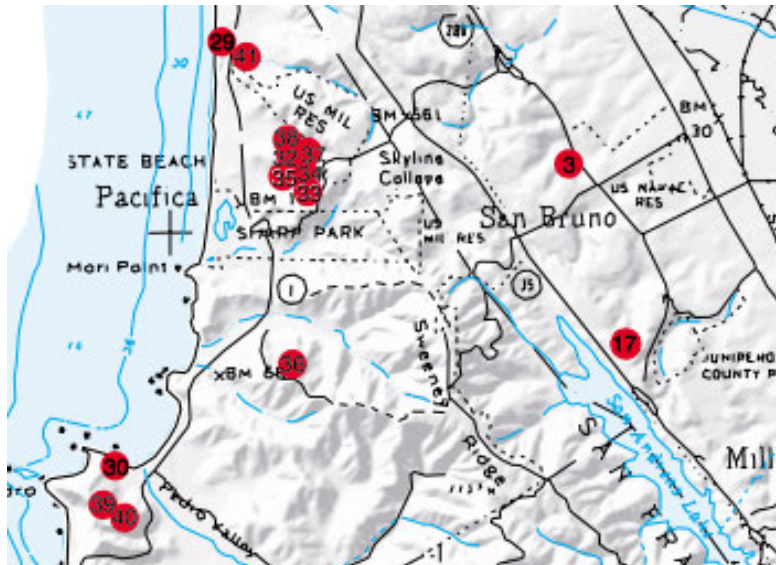


<sup>3</sup> 1.13.17 email from Lorie Tinfow, City Manager to Christian Murdock



Again, we have more accurate data here in city records, and yet do not seem to have a way to track and report these events. This lack of data collection means that historic events that could impact planning decisions and critical evacuations are lost. Vista Mar on Monterey Road is a prime example of this, where I found geotechnical engineer documentation of 4 historic landslides on this site in public records for a previous project in 1990.<sup>4</sup> The inadequate new geotechnical report for the current project that only conducted two borings by the sidewalk, not on the steep slope where the buildings were actually going to be built, completely missed these existing hazards. Our neighborhood is fortunate that we banded together and could afford to pay experts to refute the city's analysis, and the judge just recently ruled that we were correct in asking for an EIR to evaluate these hazards, but it is unfair to place this burden on the public, especially when the city has this information in hand in their records. Note that this new Figure 8-X does not show any landslides on the Vista Mar site or in the vicinity that I documented.

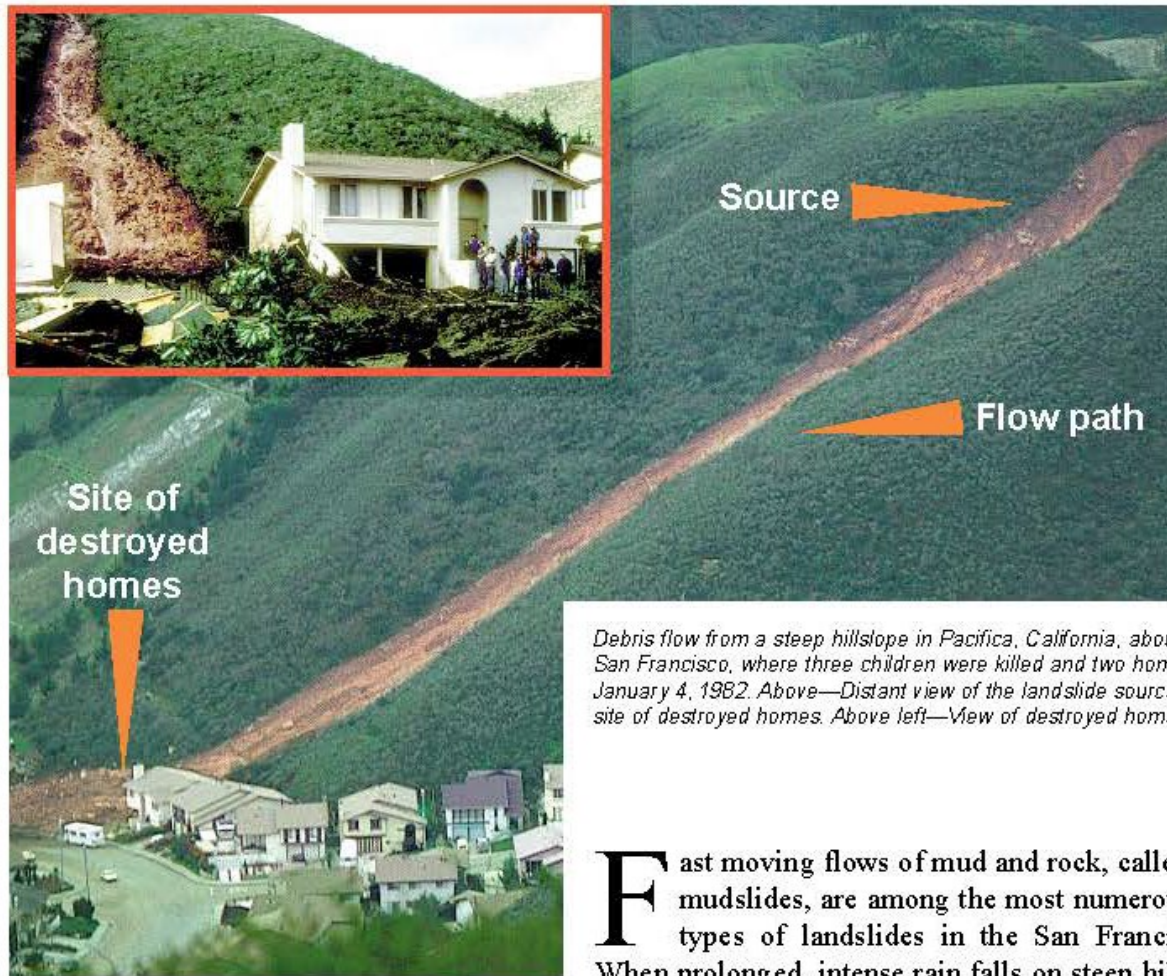
The same inadequate geotechnical review just occurred again with the City Council's approval of the home at the end of Talbot Avenue. I recently found a USGS map online that mapped landslides in Pacifica from the El Nino winter of 1997-1998. Please note that there are six documented landslides on the north side of Sharp Park Road near this site. Most of these documented landslides on this map are also all missing from figure 8-X.



I wrote a letter notifying the city of several historic debris flow slides in 1982 and 1996 on this steep hillside by Talbot Avenue.<sup>5</sup> As noted in this letter, and also in item 5 of my June 5<sup>th</sup> letter (footnote 1) geotechnical reports for debris flow areas need to include much more information than is done in a typical geotechnical report. The engineer's report for Talbot only mentioned deep seated landslides, not shallow debris flow landslides. The analysis and engineering recommendations for the two are very different. For example, most geotechnical reports only consider the project site itself within the property lines. With debris flows you need to analyze both upslope and downslope hazards as well. Just look at the 1982 Oddstad slide where the children died. The landslide originated far upslope from the property line. And the Talbot project, where the site's slope reached 100% has the potential of creating downhill debris flows affecting the homes below the site.

<sup>4</sup> Vista Mar landslide documentation by Christine Boles

<sup>5</sup> Christine Boles Talbot letter about landslides 3.28.22



Proper analysis and other mitigation measures such as avoidance of swales and the addition of deflection walls could have saved lives. The 1983 Safety Element was completely rewritten to address these hazards and yet the new Safety Element in the current General Plan has lost all this information. Other than the deficient map, there is **not even a mention of debris flow landslides** in the new General Plan. I wrote about this major omission in my June 5 and February 7, 2022<sup>6</sup> letters and yet none of this was discussed in the staff report, or in recent Planning Commission or City Council hearings. My letters even include specific policy information from the 1983 Safety Element and from new information I obtained from the Department of Conservation. It would be very easy for staff to incorporate this language. We owe it to these children who lost their lives to make sure that we do not lose this critical information that could save lives in future El Nino years.

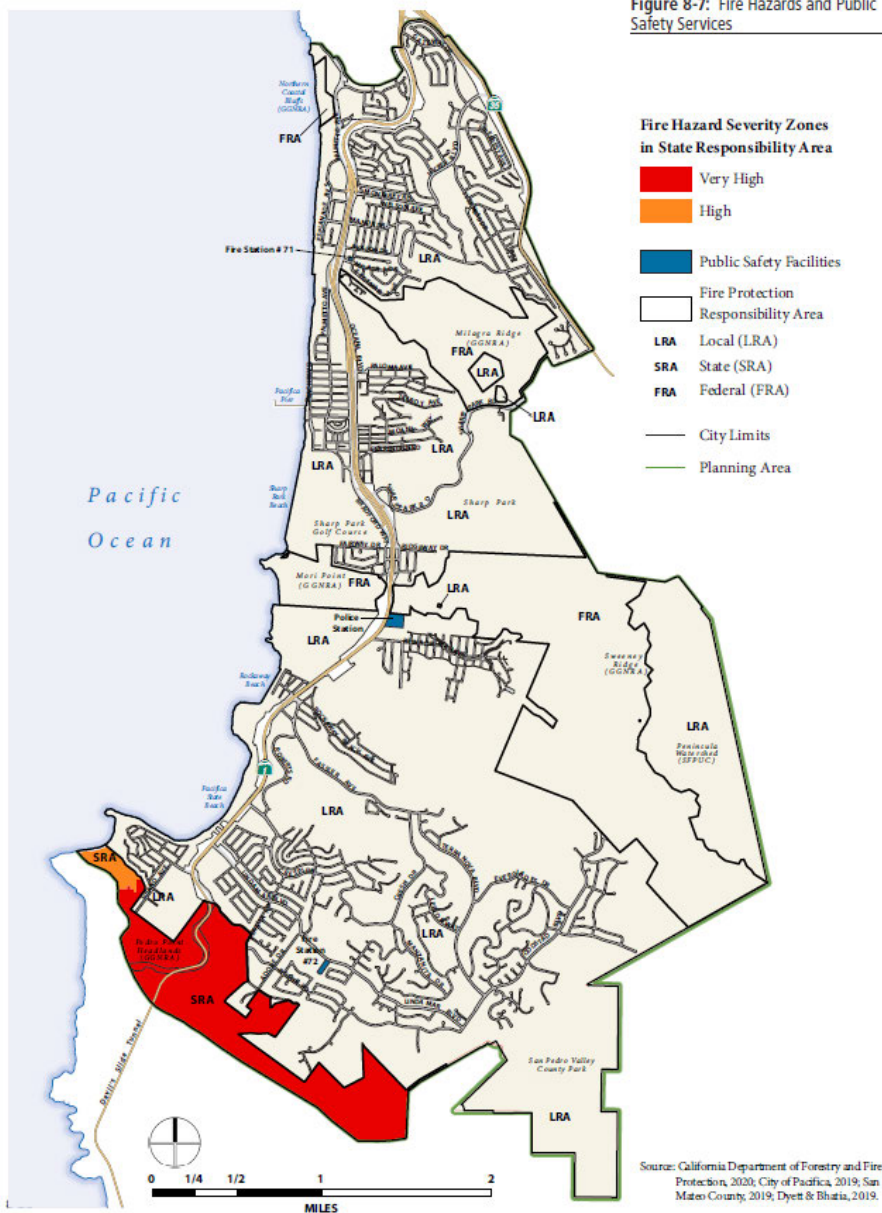
And one more item that was not addressed by the Planning Commission or Council were the errors and omissions in the Hillside Preservation Map (HPD), Figure 4-4, that I documented in my letter of June 5<sup>th</sup> (footnote 1). HPD is another ordinance we have that limits development in steep hazardous areas. We need to make sure the new HPD map does not lose sites already identified in HPD overlays in the 1980 General Plan. Staff verbally agreed that any changes to remove HPD zoning requires a vote of the people, so this map should be reviewed and corrected.

## **B. Fire**

Again, I and others, including Dr. James Kremer and Mark Hubbell, have written multiple letters about the inadequate and incomplete fire maps in the current General Plan and in the City's recently adopted Local Hazard Mitigation Plan (LHMP), which is not only referenced, but quoted as source material in these

<sup>6</sup> 2.7.22 Comment Letter #2 by Christine Boles

documents. While reviewing the LHMP last year, several current Council members agreed that this map was incorrect but assured us that it would be updated in the General Plan. The only fire map in the General Plan is the same as the one in the LHMP, and it is **BLANK** in all the city limits. In fact, the legend only says it maps fire in State Responsibility areas, not local or federal areas. Is this blank map really “best available data” as required by CEQA? I do not believe it is. See my letter of March 6.<sup>7</sup>

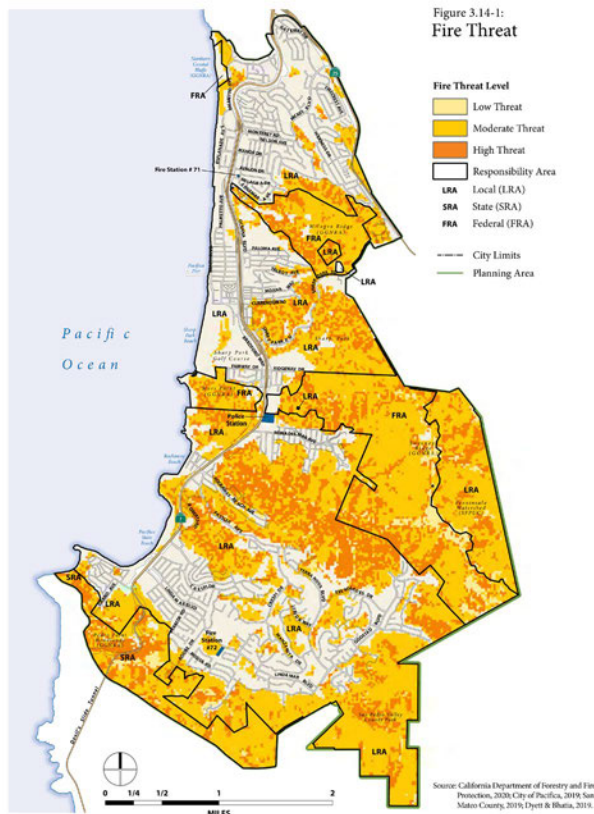


The City’s response to the blank map for all of Pacifica within City Limits is that Cal Fire is currently working on new maps of FRA (Federal responsibility areas) and LRA (local responsibility areas). While the Planning Commissioners noted that the Safety Element Fire Section will need to be revised when this new data is available (hopefully in the next year or year and a half), they neglected to note that the blank map in the General Plan can be updated now to include the data we already have in hand in the current EIR and in the 2020 Council certified Local Coastal Land Use Plan.

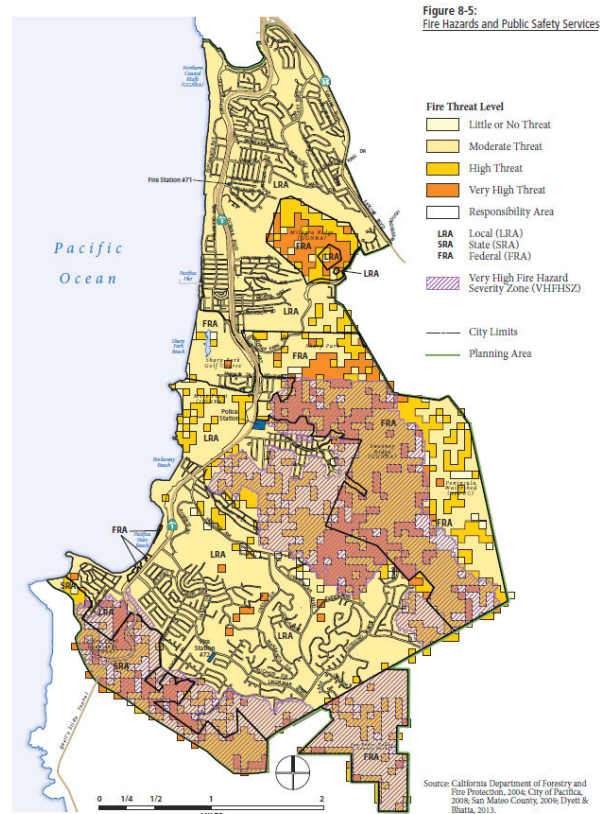
<sup>7</sup> Comment letter C by Christine Boles 3.6.22



There is a much better fire risk map already in the current EIR (image below on left). Why was this not included in the General Plan? This would be an easy map to add as the information is current and we do not dispute the data.



Fire Threat Map in EIR based on data from Cal Fire FRAP map per recent PRA request (note that source link is missing from EIR)



Fire Map in 2014 Draft General Plan

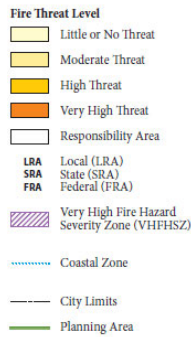
The previous fire map in the 2014 Draft General Plan (on the right) has very similar fire risk mapping to the map in the EIR (on the left), plus it adds a designation for Very High Fire Hazard Severity Zones (hatched in purple).

Staff now says that the 2014 map on the right is in error and was never adopted, and yet staff used this very map for the recent update to the LCLUP that the Council certified and sent to the Coastal Commission in 2020, see below. This is known in legal planning terms as a horizontal discrepancy between General Plan documents, which is not allowed.

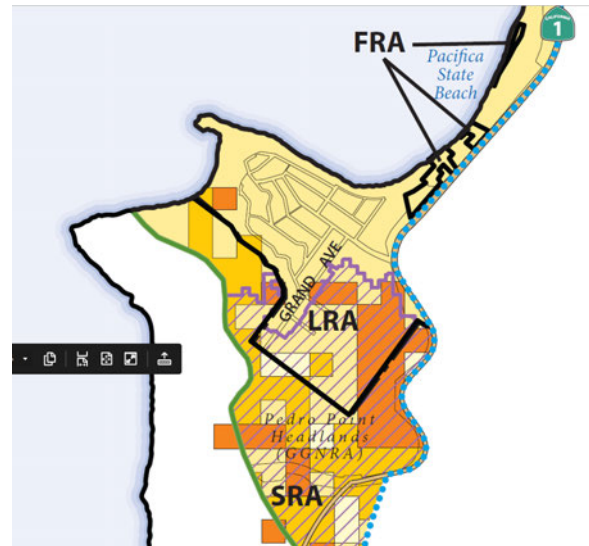




Figure 5-4:  
Fire Hazards and  
Emergency Services



Source: California Department of Forestry and  
Fire Protection, 2008; City of Pacifica,  
2019; San Mateo County, 2019; Dyett &  
Bhatia, 2019.



Fire Map in LCLUP

Enlarged LCLUP map showing VHFHSZ where  
homes exist off of Grand in Pedro Point

The approved map in the LCLUP, shows very high fire hazard severity zones in developed areas with existing housing in Pedro Point. The General Plan and EIR both specifically say that there are no Very High Fire Hazard Severity Zones in habited area so that is a conflict that needs to be resolved before these documents are approved.

### **III. Basis 3 (Packet Page 13)**

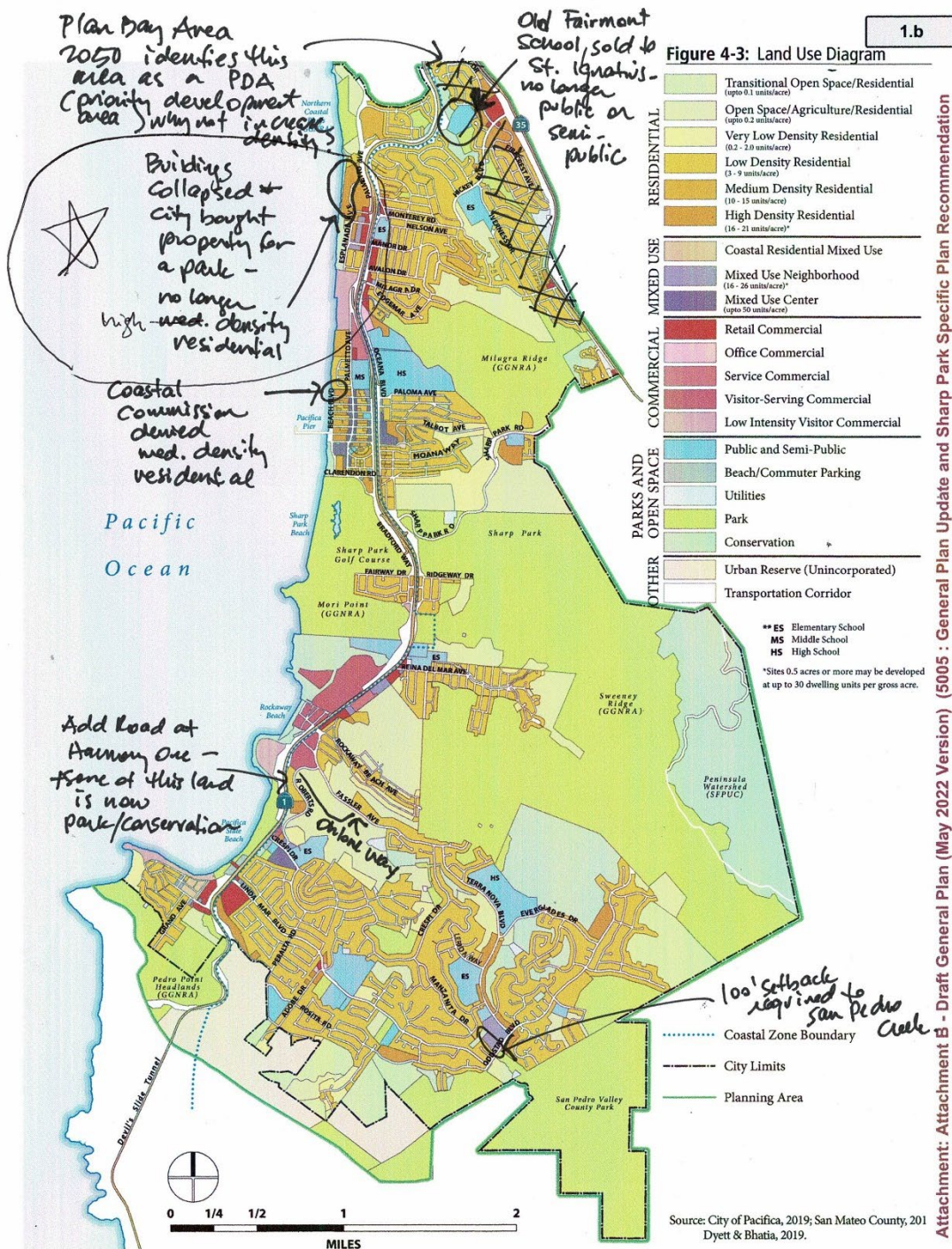
A Program EIR does not justify deferring analysis of GP Update impacts to a later tiered EIR or negative declaration (see CEQA Guideline [sic] 15152).

We do not have time to present these issues at the appeal hearing and are focusing the appeal on issues of public safety as detailed above. I would refer you to comment letters from the Pedro Point community, Brian Gaffney and the Department of Fish and Wildlife regarding deferred analysis of biological impacts and environmentally sensitive habitat Areas (ESHAs).

## **CONCLUSION**

As an example, of the importance of hazard mapping, please note that the Land Use Map Fire 4-3 still shows the lots on Esplanade where the apartments fell into the ocean as high density residential. I sent this annotated map

in by email on June 7th<sup>8</sup>. Mr. Murdock replied to Mayor Bier's question on the issue by saying that these properties are privately owned seemingly implying that the threat of a takings argument would prevent the city from rezoning this site to something safe, like conservation or transitional/open space/residential. And yet this very same rezoning was done for Linda Mar Woods and Vista Mar in this new Land Use map.



<sup>8</sup> June 7, 2022 email from Christine Boles

I remind you that we taxpayers were forced to foot the bill to remove these buildings on Esplanade, and that the wealthy owner, who apparently still owns a lot of property in Pacifica, seems to have gotten off the hook with no financial responsibility. Leaving these properties zoned as high density residential is irresponsible and dangerous.

Again, our ask in this appeal is simple and straightforward, to send the Safety Element of the General Plan back to the Planning Commission to review and fix these critical issues of life safety.

Please feel free to reach out to me if I can provide any further clarification before the hearing. Mark and I look forward to making our presentation to you and to the public.

With gratitude for your service in this important time for this long overdue update to our General Plan.

Sincerely,

A handwritten signature in cursive script that reads "Christine Boles".

Christine Boles, Architect  
License #C024448  
Principal

Cc: Planning Commissioners  
Christian Murdock, Deputy Planning Director  
Kevin Woodhouse, City Manager  
[publiccomment@pacificagov](mailto:publiccomment@pacificagov)



**From:** Christine Boles [REDACTED]  
**Sent:** Monday, July 11, 2022 12:48 PM  
**To:** Murdock, Christian; Public Comment  
**Subject:** link error in EIR response to comment

**[CAUTION: External Email]**

Hi Christian,

I'm doing some last minute review of responses to my comment letters on the EIR for the appeal. Response 54-16 gives this [Link](#), but the link does not work.

Comment ID	Commenter	Date	Comment	Response
CS4-16	Christine Boles	3/6/22	Further down on page 4 the DEIR it says, "2008 study determined that the Vallejo, West and East Fairway Park, Rockaway Beach, and Rockaway neighborhoods in central Pacifica are beyond four minute travel distance from northern San Mateo County fire stations, corresponding with the standard response time for first due fire apparatus. The full assignment response time standard cannot be met in Pacifica from Vallejo south." This section references a 2008 "Emergency Services Consulting". Please provide a link or a copy of the report from this consulting effort and hopefully more recent consultant data given our increased population and traffic issues.	A link to this resource is available here: <a href="https://www.cityofpacific.org/government/city_manager/fire_protection_options_analysis/default.asp">https://www.cityofpacific.org/government/city_manager/fire_protection_options_analysis/default.asp</a>
CS4-17	Christine Boles	3/6/22	The bottom of page 4 states that "Population growth will increase existing deficiencies in service delivery. The Fire Authority considers the City's geography to be the limiting factor for delivery of fire service. According to NCEA, a third, mid-point station in Pacifica with a	Please see response in comment CS3-2 for more information on fire station planning. This issue is related to the GP and not related to the adequacy of the DEIR; please see Master Response 1. Additionally, please see Master Response 7: Emergency Access for more information on the adequacy of evacuation planning.

Can you please send me the correct link as soon as possible? Thanks!

This [www.cityofpacific.org](https://www.cityofpacific.org) page can't be found

No webpage was found for the web address:  
[https://www.cityofpacific.org/government/city\\_manager/fire\\_protection\\_options\\_analysis/default.asp](https://www.cityofpacific.org/government/city_manager/fire_protection_options_analysis/default.asp)

HTTP ERROR 404

[Reset](#)

Christine Boles, Architect

**Beausoleil Architects**



Pacifica, CA 94044



[www.beausoleil-architects.com](http://www.beausoleil-architects.com)

*“Do your little bit of good where you are; it's those little bits of good put together that overwhelm the world.” - Desmond Tutu*

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**From:** Mark Hubbell [REDACTED]  
**Sent:** Monday, July 11, 2022 12:58 PM  
**To:** Public Comment; Coffey, Sarah; Bigstych, Tygarjas; Bier, Mary; O'Neill, Mike; Vaterlaus, Sue; Beckmeyer, Sue  
**Subject:** General Plan Update Appeal  
**Attachments:** GP-Appeal-Wildfire-7-11-22C.pdf

**[CAUTION: External Email]**

Good day,

Attached are my comments for the General Plan Update

Thank you,

Mark

--

Mark Hubbell — phone: [REDACTED] — email: [REDACTED]

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

**Good day, City Staff and Councilmembers.**

**Finally, Pacifica is living in the 21<sup>st</sup> century! Well almost.... One glaring exception being a lack of foresight displayed in the mitigation of loss and damage by hazardous wildfires.**

**Listening to my friends and neighbors express their concerns, mainly fears, over the increasing reality of deadly or badly damaging wildfires in the Park Pacifica, Linda Mar, Vallemar, East Sharp Park, and Upper Rockaway neighborhoods, encouraged me to take positive action on this particular subject. The neighborhoods listed contain nearly 50% of the total population of Pacifica.\* It is very probable that a large percentage of citizens will experience at least an ongoing high degree of unnecessary anxiety, if not actual loss or damage.**

**Pacifica has had some history with wildfires, fortunately so far without direct loss of human life. Many of us remember three incidents in Park Pacifica alone. At least one incident needed to be extinguished by aircraft spraying Phos-Chek -- the familiar red colored chemical which can be toxic to fish and other wildlife -- over the San Pedro Creek Watershed.**

**The fire described above was way back in 2007, the same year that the fire maps used as a basis for this current "Update" were published – over 15 years ago! A new General Plan must be future-facing to effectively guide us through the next few decades. According to CAL FIRE, new fire maps are in the process of being created with computer modeling features**

**that will soon replace the obsolete maps that the hazard assessment this new plan is based on. Climate change -- global warming; drought; intensified storm conditions are already here. Hopefully our city and aligned agencies will subscribe to this real-time data for the safety of our community – “the best available information” will be available soon.**

**The most concerning issue regarding wildfire safety with this current General Plan Update is the absence of coherent evacuation plans. There are notations on these maps delineating narrow one-way evacuation routes, affirming an awareness of the dangers, but with a failure to proscribe any remedial initiatives. In the Park Pacifica valley, the only two available evacuation routes will be largely ineffective in accommodating the likelihood for thousands of vehicles heading to safety. These evacuation maps are missing information to assess the capacity, safety, and viability of routes under a range of emergency scenarios as required per (AB) 747. Our designated Zonehaven evacuation destination is approachable only through two of the most highly fire prone areas of the City.**

**Be wise, save lives -- please send the the GPU Wildfire and Landslide hazard recommendations back to the Planning Commission to be updated.**



**All the hard work by our City Staff and associates that has gone into this new General Plan Update is greatly appreciated!**

**Thank you,**

**Mark Hubbell – 35-year resident of Park Pacifica**

**\*(2019 Census)**

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**From:** Samuel Casillas <[REDACTED]>  
**Sent:** Friday, July 1, 2022 4:26 PM  
**To:** Murdock, Christian; Public Comment  
**Subject:** Re: Public Notice - Appeal of Planning Commission Recommendation to Approve the General Plan Update and EIR Certification (City of Pacifica)  
**Attachments:** GPU DEIR appeal letter 7 11 22.docx

**[CAUTION: External Email]**

Hi Christian,  
I will not be here for the appeal so I wanted to make sure my comments get in the record. Please include the attached.

Thank you and I hope you and your family have a nice Fourth of July,

Sam

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**From:** Murdock, Christian <cmurdock@pacifica.gov>  
**Sent:** Wednesday, June 29, 2022 6:50 PM  
**Subject:** Public Notice - Appeal of Planning Commission Recommendation to Approve the General Plan Update and EIR Certification (City of Pacifica)

Dear Interested Party,

Please see attached for a public notice of an upcoming hearing to consider an appeal of the City of Pacifica Planning Commission's recommendation for City Council approval of the General Plan update and certification of a final environmental impact report (EIR) for the General Plan update and Sharp Park Specific Plan on Monday, July 11, 2022.

Regards,

Christian



**CHRISTIAN MURDOCK, AICP**  
**DEPUTY DIRECTOR OF PLANNING**  
**CITY OF PACIFICA | PLANNING DEPARTMENT**  
540 Crespi Drive, Pacifica, CA 94044  
Phone: (650) 738-7341 | [cmurdock@pacifica.gov](mailto:cmurdock@pacifica.gov)

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Mr. Christian Murdock  
Deputy Planning Director  
Planning Department  
1800 Francisco Boulevard  
Pacifica, CA 94044  
[cmurdock@pacificagov](mailto:cmurdock@pacificagov)  
[publiccomment@pacificagov](mailto:publiccomment@pacificagov)

CC: California Coastal Commission

Date: July 1, 2022

Subject: Appeal of Planning Commission Recommendation to Approve the General Plan Update and EIR Certification (City of Pacifica) on Monday, July 11, 2022.

Dear City Council:

In the previous Planning Commission meeting on 6/6/22 my concerns for the deficiencies and document contradictions were not considered and need to be addressed by the City Council prior to the potential appeal to the California Coastal Commission.

To reiterate:

Over the past decade the community of Pedro Point has attempted to act as a partner in the update to Pacifica's General Plan, including neighborhood meetings with the input and participation of the city manager's office. The community even requested the city work with us to develop a neighborhood specific plan which the city also dismissed. I personally have tried to be a conduit for community input as a past member of both the Pacifica Sea Level Rise Adaptation Planning Committee and the Pacifica GPU Community Outreach Committee and I can once again state that the majority of our concerns about this plan have consistently been ignored. The DEIR even states in chapter 4.2 that "the alternatives were selected to, "the range of choices that have the broadest support from the community", yet that city has disregarded over 99% of what the Pedro Point Community has repeatedly recommended for the property known as the Pedro Point Field in order to please only the investor property owner.

We have been forced to hire biologists, CEQA experts, environmental attorneys and submitted irrefutable evidence of special species and ESHA along with documented CEQA and Coastal Act violations and yet the city continues to work against its own citizens.

Under the current draft of the 2022 GPU states implementation policies to Expanded low-intensity outdoor Commercial Recreation on sites near Pacifica State Beach (ES-I-34), Preserve the Experience of the Natural Environment that do not disrupt view corridors (ES-I-35), be a center for recreation and community (CD-I-1), Improve pedestrian routes along corridors (CD-I-24), Open Space Conservation and Habitat Protection that support critical wildlife habitat and special status species (LU-G-7) and to not increase the density or intensity of land use designations beyond those indicated in the LCLUP for sites located within Coastal Vulnerability Zones (LU-G-8), not to mention the violations of SB379, yet these policies are exactly what the City chose to ignore by recommending residential at this site.

Further, with the city being fully aware of the denial of the CDP at 505 San Pedro due to the multiple hazards including flooding, shallow water table, identified multiple protected species, wetlands and an ESHA designation the city has still ignored this data. As far as the CRLF is concerned the CCC biology report states that the frog needs a minimum of a 300 ft foraging corridor. Again, the City has chosen to ignore this data. The city does recognize the existence of the CRLF in the DEIR "Special Status Species" figure 3.7-4 but omits the USFWS guidance of a minimum of 300 feet of foraging corridor for the special status species. Additionally, because the species is not able to forage in any other direction because of the existing developing to the south and east the whole west of the Site is needed for foraging habitat which can end up covering the whole field. In addition, the city has cherry picked a low SLR range that the CCC says is mandating at 6.9 feet which is based on the best available science.

If these egregious denials were not enough the California Coastal Commission has continually requested this same data to certify the LCLUP that they handed to you and that we have made available to you all, which included that denial of the CDP application 2-19-0026 at 505 San Pedro Ave where the Coastal Commission's biologist and the Department of State Fish and Wildlife concluded the presence of ESHA and the California Red Leg Frog in the adjacent waterway AND also surmised that the Pedro Point Field was most likely wetlands, yet the city has chosen to ignore the coastal commission and F&W.

Specific to violations of CEQA the city master responses state erroneously that it can defer a site specific EIR until another project is proposed in this area and basically ignore any data presented by the agencies that will need to certify the City's General Plan because there is a "conflict of experts". CEQA does not allow this deferral for two reasons:

1. The city is required to make the determination now as to which data it will use to justify their recommendation
2. The city is proposing substantial changes from the current zoning of Commercial recreational to residential and also ignoring the on-site conditions of zero current structures; they can not hypothetically state a fast food joint can be built there now so the housing will be less impact

NOTE: many of the responses to our questions are that the comments are "noted" or "comments received"; this response is inappropriate at best and also insulting.

The city also states that the FEIR also reviewed hydrology hazards throughout the city, yet there is no data specific to the water table rising due to SLR in the Pedro Point Field. Just by walking through the southwest corner of the field there is water percolating to the surface all year around as well as the before-mentioned analysis of the CCC that the field is most likely a wetland.

The general plan actually has a Conservation (C) designation that states that it also applies to privately-owned open areas where the land is physically unsuitable for development due to geotechnical hazards, excessive steepness, wetlands, Environmentally Sensitive Habitat Areas (ESHA) or other environmental constraints or lies within stream channels; this site meets all these criteria so why is it not designated as Conservation? This site should result instead as a density transfer to another area of Pacifica if needed. The ideal transfer would be to add housing as a policy overlay to strip malls throughout Pacifica where very little environmental damage will occur due to hazards or ESHA.

The city is also stating that it can defer review of wildlife corridors because it doesn't have the data. All that the city has to do is look on NextDoor or ask any agency like F&W who has given the city the data that mountain lions are all over Pacifica which is also an improper deferral of analysis under CEQA.

The city is also not addressing the issue of water resources and availability to residents in this era of the climate crisis so how can there be a determination of the increase of housing without appropriate water resources.

The city is also proposing to get rid of the height limitations throughout the city including the coastal zone and currently specific to the SPSP which is also in violation of the CEQA. Additionally, stating the designated number of units per acre is moot without taking state regulations like SB9, SB10 and affordable housing credits into consideration also makes this FEIR fatally flawed.

Under separate cover Richard Grasseti, Principal of Grasseti Environmental Consulting has provided a multitude of areas with the DEIR violates CEQA and is therefore fatally flawed. Mr. Grasseti also recognizes the reasonable argument that this Site should be designated Conservation.

Additionally, the city fails to document prior landslide activity throughout Pedro Point and fire hazard at Grand Ave and Olympian Way.

Also, the Rockaway Headlands GPU land use designation changes fails to consider erosion hazards and the FEIR ignores the potential for wildlife habitat including wildlife corridors potential. The Land Use Designation for this area should be Conservation.

In summary the Undeveloped San Pedro Avenue Field Site, Pedro Point in general and the Rockaway Headlands have a multitude of encumbrances including environmental designations and hazards the City has chosen to willfully ignore and

places the adoption of the LCLUP by the California Coastal Commission (CCC) in jeopardy. At this time because of the City's consistent inability to integrate undeniable scientific data as far back as 2005 it would be prudent to have the CCC assume responsibility of the LCLUP process in order to reconcile the required GPU alignment so that we do not continue to rely on a GP that is over 43 years old and a City that is negligent and unwilling to listen to its citizens or sound data.

Sincerely,

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

---

**From:** Rick Nahass <[REDACTED]>  
**Sent:** Thursday, July 7, 2022 5:31 PM  
**To:** Murdock, Christian; Public Comment; O'Neill, Mike; Bigstych, Tygarjas; Vaterlaus, Sue; Beckmeyer, Sue; Bier, Mary; Carter, Yulia; Woodhouse, Kevin; Murdock, Christian; O'Connor, Bonny; Berman, Lauren; Hauser, Samantha; Domurat, George; Ferguson, Alex; Godwin, James; Leal, David; Wright, Greg; Petersen, Lisa  
**Subject:** Circulation Amendments General Plan Comments  
**Attachments:** MobilityCirculationPacificaGeneral PlanPublicComment.pdf

**[CAUTION: External Email]**

Please find my 'public comments' on the Pacifica General Plan in advance of the July 11 Special City Council Meeting attached to this email.

Thank You,  
Rick Nahass  
[REDACTED] Pacifica, CA 94044  
[REDACTED]

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The Great Perhaps, Circulating Pacifica – Rick Nahass, [REDACTED], Pacifica

Pacifica could have applied for a \$100K grant to begin developing a Transportation Demand Management (TDM) plan from the San Mateo County Transit Authority (SMCTA) as part of the SMCTA ACR/TDM Measure A/W sales tax funding program but did not apply despite being notified that 30% of the awards for the entire county were prioritized for coastal towns with Pacifica specifically called out. Both Half Moon Bay and the mid-coast applied and are recommended to be awarded \$100K each to update their existing TDM program, [Connect the Coastside](#).

Measure A and W Funding Category	Administration	Annual Allocation of New Funds
Small and Coastal Jurisdictions	Competitive – Call for Projects	30%
Mid/Large Jurisdictions	Competitive – Call for Projects	70%

TABLE 6-9: SMALL AND COASTAL JURISDICTIONS

Jurisdiction	Population
Colma	1,302
Portola Valley	4,592
Brisbane	4,697
Woodside	5,542
Atherton	7,168
Hillsborough	11,447
Half Moon Bay	12,834
Pacifica	38,984
<b>Total</b>	<b>86,566</b>

**TDM Planning  
\$775,000 Available**

**\$472,000  
Applied for  
and Awarded**

Perhaps the reason for Pacifica's reluctance is the exclusion of a General Plan element to develop a TDM plan or an element to work towards justifying the benefits of Pacifica inclusion in the SMCTA [Connect the Coastside](#) plan jurisdiction (e.g., a united 60K coastside population gets noticed.)

The Comprehensive Pacifica General Plan with its visions and hopes for the future, omissions and mistakes will almost certainly be approved by City Council. Per California state law, amendments to the General Plan are allowed four times a year. Perhaps the City Council might direct staff to begin accepting proposals for amendments immediately after initial approval for consideration in say, six months or so. Perhaps over time with collaboration of City staff, Council and active citizens a regular, trusted and periodic small scale amendment process evolves that corrects mistakes, re-prioritizes direction and adds elements based on new realities, ideas and region/state laws.

This first round of Circulation amendment proposals should include:

1. Establishment of a formal Pacifica TDM Plan or inclusion of Pacifica TDM policy and initiatives in the existing [Connect the Coastsides](#) TDM plan, because referencing a TDM plan is the entry point for qualifying for competitive transportation funding. US Department of Transportation and Caltrans [State Route \(SR\) 1 District 4 TCR Report](#) considers the Highway 1 from SR92 to Sharp Park Road as one rural section of highway.

The 25-year Concept from existing facility to future facility is summarized below, including recommended strategies by segment.

**SR 1 South Concept Summary**

SEGMENT	COUNTY	SEGMENT DESCRIPTION	EXISTING FACILITY	25-YR CONCEPT	STRATEGIES TO ACHIEVE CONCEPT
Segment A PM 0.00–29.04	SM	Santa Cruz/San Mateo County Line to SR 92	2 lane Conventional Highway	2 lane Conventional Highway	<ul style="list-style-type: none"><li>• Monitor and plan for sea level rise</li><li>• Continue to study SR1 erosion and bypass between Pescadero &amp; San Gregorio.</li><li>• Monitor and install rock slope protection and drainage</li><li>• Support completion of CA Coastal Trail</li><li>• Support "Connect the Coastsides" plan</li><li>• Improve the pedestrian environment</li></ul>
Segment B PM 29.04–R43.46	SM	SR 92 to Sharp Park Road, Pacifica	2-4 lane Conventional Highway	2-6 lane Conventional Highway	<ul style="list-style-type: none"><li>• Support "Connect the Coastsides" efforts</li><li>• Support completion of CA Coastal Trail</li><li>• Implement new Traffic Operations Systems elements including Closed Circuit TV and Variable Message Signs</li><li>• Maintain &amp; improve Park &amp; Ride lots</li><li>• Improve coastal community safety &amp; mobility with consistent roadway edges, shoulders, ped crossings &amp; roundabouts</li><li>• Monitor and plan for sea level rise</li></ul>

**Caltrans Transportation Concept Report  
State Route 1 South District 4, April 2018**

2. Using [Vehicle Miles Traveled \(VMT\) reduction laws](#) to justify [initial and yearly fees](#) on any new development until state/regional agencies provide funding/projects to accommodate infrastructure requirements for new housing mandates, much like the recently increased sewer fees. Of course where resources/funds are restricted, getting safe water to our homes is a higher priority than having a bus you can catch at the corner



to take you speedily to BART or across the Golden Gate Bridge without transfers.

3. The 2020 approved [\*City of Pacifica Bicycle & Pedestrian Master Plan\*](#) is an excellent operational model for how citizen committees can work with city staff to collaborative conceptualize, find funding for, and build plans. Special kudos is given to the committee chair and staff project manager for their creativity, drive, and passion in making this plan happen. The City regularly uses this plan to win competitive fund grants for prioritized Bike and Ped projects. Added to the General Plan might be enhanced roles for committee/commission member active participation and collaboration outreach, lobbying, grant writing, etc. with city staff.

## **ACKNOWLEDGMENTS**

### **PACIFICA CITY COUNCIL & MAYOR**

**MAYOR DEIRDRE MARTIN**

**MAYOR PRO TEM SUE BECKMEYER**

**COUNCILMEMBER SUE VATERLAUS**

**COUNCILMEMBER MARY BIER**

**COUNCILMEMBER MIKE O'NEILL**

*City of Pacifica  
Bicycle & Pedestrian Master Plan  
February 2020*

### **PARKS, BEACHES, AND RECREATION COMMISSION**

**CYNTHIA KNOWLES, CHAIR**

**NICK LUSSON, COMMISSIONER**

**ELI POBLITZ, CHAIR PRO TEM**

**GAIL BENTON SHOEMAKER, COMMISSIONER**

**CINDY ABBOTT, COMMISSIONER**

**JAMES HEYWOOD, COMMISSIONER**

**KEVIN KELLOGG, COMMISSIONER**

### **PACIFICA STAFF**

**SAM BAUTISTA, ACTING DIRECTOR OF PUBLIC WORKS/CITY ENGINEER**

**MICHAEL PEREZ, DIRECTOR PARKS, BEACHES, AND RECREATION DEPARTMENT**

**RYAN MARQUEZ, ASSOCIATE CIVIL ENGINEER – PROJECT MANAGER**

In August 2022, the SMCTA has a new [Pedestrian and Bicycle call for projects](#). Perhaps after two years our Pacifica Bike and Ped Master plan could use a small update. Perhaps the City Manager can take it on the chin (once again) and assign a staff project manager to respond to this new call for projects.

---

**From:** Vicki Sundstrom <[REDACTED]>  
**Sent:** Friday, July 8, 2022 12:07 PM  
**To:** Murdock, Christian; \_City Council Group; Woodhouse, Kevin  
**Cc:** Public Comment; Christine Boles; Mark Hubbell; Rick Nahass  
**Subject:** Transportation Analysis as part of GPU/EIR/SPSP

**[CAUTION: External Email]**

Christian & all,

I saw the comments regarding the traffic analysis in response to the appeal being heard on Monday and thought I would provide an expert response.

Before I go further and lose you, **CalTrans has its own mitigation requirements for traffic generators on the state highway system.** Were the draft plans submitted to CalTrans?

For what it's worth, I've been working in some capacity or another in transportation/traffic - roadways, congestion management, since 1994. It's not an easy subject to discuss with people who don't do transportation but I'm going to try and break it down as to why the analysis is lacking and why the measures are lacking.

1. California law requires cities to do traffic counts, conduct intersection analysis, warrant analysis, speed surveys and other surveys/counts on a regular basis. Including tabulating and studying accident reports filed by the police. I did them as an intern every year when I started my career. This is required of Pacifica by law- it's required of every city by law. There are numerous options for funding this work.
2. With the data collected, the city needs to look at what needs to be done to manage traffic on the roads, do stop signs need to be added, signal timing adjusted, speed managed etc.
3. The State and County have mandated congestion management and transportation demand management. So that growth of vehicles on the roads is managed and mitigated. This is in addition to the obligations stated above. In fact, every city has to provide reports on compliance.
4. Because all of the above is not done or has never been done, traffic has grown with no sense of where, how much, why and how to mitigate it. We're talking about both traffic on the road as well as vehicles parked on the street. From the residents, through traffic, visitors and businesses.
5. If Pacifica had been doing a General Plan on a regular basis, you'd have to look at traffic growth and what to do about it, including how to fund necessary improvements and how to mitigate traffic. The traffic growth has not been looked at for some time - you haven't addressed the organic growth, the growth from being a robust tourist destination, from the shopping districts, from additional housing or any development at the quarry.
6. Mitigation measures need to be effective and align with the traffic generator. If the VMTs have to do with people commuting to work - this is what you have to mitigate. If you say that people commuting to SF and South Bay are the key VMT generators - then the mitigation should be along those lines. There are different mitigation measures for different generators (housing, tourism, shoppers, businesses etc.)

7. The measures stated, MM-TRA-1 and MM-TRA-2, are entirely inadequate. Local businesses are service oriented, there are no work from home options and there is no real local transit to speak of, how much will you mitigate there and that's not where you have to put your resources.. Pacifica cannot require businesses not in Pacifica to adopt WFH policies, MM-TRA-2 is pointless & voluntary - gets us nothing.

8. Mitigation measures are required to be monitored, reported and enforced - by law. GP docs state these as optional. Each growth generator/project has to have trip reduction measures as part of the condition of approval. These are clearly stipulated goals. My client site has a 15% trip reduction goal. Google has 25% all day trip reduction and 35% during commute hours. Apartment complexes on transit corridors have little to no parking. Crown Colony in SoSF runs a shuttle to BART.

9. What do real mitigation measures look like? Some examples -

- Parking restrictions/policies - having to pay to park the cars on streets or having to buy a parking permit for the parking at their apartment complex
- Limit parking available on-site and no parking offsite. This works for schools & churches. Push them to implement carpools, vanpools, shuttle service.
- implement a shuttle service to BART/CalTrain
- implement bike, ebike, bike share program
- there is a lot more to pick from - just search VMT mitigation.

10. Because the overall analysis is lacking, you cannot really determine if the evacuation routes will actually work or if additional infrastructure is needed.

Hope this was helpful.

Vicki Sundstrom

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**From:** William.Leo Leon [REDACTED]  
**Sent:** Friday, July 8, 2022 12:44 PM  
**To:** Pacifica Permit Tech; Public Comment; Coffey, Sarah; Murdock, Christian; \_City Council Group  
**Subject:** Re: Regarding the Appeal Hearing, General Plan Update, July 11, 2022  
**Attachments:** GPU 2DEIR Appeal July 11, 2022.docx; My GPU-LCLUP Comment Letter.docx; CCC Pacifica Comment Letters GPU.docx

**[CAUTION: External Email]**

July 8, 2022

Honorable Mayor and City Council Members

Regarding: July 11, 2022 Appeal of General Plan Update and Final EIR Recommendation

I am writing to express reasons and provide you with details of why you should uphold the Appeal and send the General Plan Update (GPU) and Final Environmental Impact Report (FEIR) Back to the Planning Commission with specific direction. The direction is necessary to correct deficiencies, provide omitted, missing, erroneous or inconsistent data. And to provide responses and analysis consistent with CEQA guideline to commenters' letters.

Also of great importance is Staff did not follow the Guidance of the California Coastal Commission (CCC) in its comment letters regarding the GPU and the Sharp Park Specific Plan. And did not provide responses and analysis consistent with CEQA guideline to the CCC comment letters. The Commission commented that it makes "the most sense to coordinate timing of the GP/SPSP for after the Land Use Plan (LUP) is certified, given the outstanding nature of the LUP certification.

1. In regards to the 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.

I agree with the Coastal Commission that the City is going about its GPU in a backwards way, and that it is making the General Plan Update inconsistent with the existing certified LCP and therefore, Coastal Act Policies. The City also needs to reply to the 90 pages of prior comments the Coastal Commission attached the comments raise serious concerns that must be addressed. Another reason to send the Appeal back, give direction for City responses to CCC comment letters that were ignored.

## 2. In Regards to Statement of Overriding Considerations

The City fails to comply with CEQA Guideline 15093, subd. (b) by stating the specific reasons why the purported benefits of Statements 1 through 9 (PDF 3473-74) outweigh the unavoidable environmental risks of significant, unavoidable Impact 3.3-1. The City fails to support its statement of overriding considerations with substantial evidence in the record in violation of CEQA Guideline 15093, subd. (b). The City only vaguely states that substantial evidence supporting the various benefits of the project can be found somewhere in public records on the General Plan update process, but fails to state specifically what constitutes this substantial evidence. Findings The City makes the CEQA finding “pursuant to CEQA Guidelines section 15091(a)(3)” that specific considerations “make infeasible the mitigation measures or project alternatives identified in the Final EIR.” There are many hundreds of mitigation measures in the Final EIR that are summarized in Table ES-3. See Attachment H, pp. E11 through E-131. There are three project alternatives. The City fails to explain the rationale for its finding of

infeasibility in regards to each of the mitigation measures and project alternatives identified in the Final EIR as required by CEQA Guideline 15091(a). The finding also fails to describe the specific reasons for rejecting each identified mitigation measures and project alternatives as required by as required by CEQA Guideline 15091(c). The City’s CEQA Guideline 15091(a)(3) finding is not supported by substantial evidence in the record. Mitigation Monitoring & Reporting Plan The City must adopt a program for reporting on or monitoring the changes which it has either required in the project or made a condition of approval to avoid or substantially lessen significant environmental effects. These measures must be fully enforceable through permit conditions, agreements, or other measures. CEQA Guideline 15091(d). Mitigation Measure MM-GHG-3 is not fully enforceable as it is voluntary. Mitigation Measure MM-TRA-2 is not fully enforceable as it is voluntary. Mitigation Measure MM-TRA-1 has no program for reporting or monitoring in the MMRP. The City has no program for reporting on or monitoring the hundreds of “proposed policies” that it claims would reduce impacts. None of the five mitigations listed in the MMRP have been made “fully enforceable” through either permit

conditions, agreements, or other measures. For all the reasons mentioned above, send the Appeal back with direction to address and correct these issues.

### 3. In Regards to my comment letter of March 2, 2022

I wrote 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
- 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: 1. High Habitat Value/Threatened by Fragmentation

2. Wildlife Movement Corridor

#### 2. Inconsistencies:

A. 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).

B. 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.

Considering all of the facts supporting inconsistencies exist, I hereby request that the City of Pacifica correct and update its relevant documents, in both the GPU, the LCLUP and the 2022

Final EIR, 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.

Please read the attached letters for a more complete understanding of the issues raised.

Respectfully,

**Leo Leon**

William "Leo" Leon



Pacifica CA 94044

Attachments:

Leo Leon Letter March 2022

California Coastal Commission correspondence

###

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July 8, 2022

Honorable Mayor and City Council Members

Appeal July 11, 2022 General Plan Update & Final EIR

Sent via email and public comments

I am writing to express reasons and provide you with details of why you should uphold the Appeal and send the General Plan Update (GPU) and Draft Environmental Impact Report (DEIR) Back to the Planning Commission with specific direction. The direction is necessary to correct deficiencies, provide omitted, missing, erroneous or inconsistent data. And to provide responses and analysis consistent with CEQA guideline to commenters' letters.

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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



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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.

I agree with the Coastal Commission that the City is going about its GPU in a backwards way, and that it is making the General Plan Update inconsistent with the existing certified LCP and therefore, Coastal Act Policies. The City also needs to reply to the 90 pages of prior comments the Coastal Commission attached the comments raise serious concerns that must be addressed. Another reason to send the Appeal back, give direction for City responses to CCC comment letters that were ignored.

## 2. In Regards to Statement of Overriding Considerations

The City fails to comply with CEQA Guideline 15093, subd. (b) by stating the specific reasons why the purported benefits of Statements 1 through 9 (PDF 3473-74) outweigh the unavoidable environmental risks of significant, unavoidable Impact 3.3-1. The City fails to support its statement of overriding considerations with substantial evidence in the record in violation of CEQA Guideline 15093, subd. (b). The City only vaguely states that substantial evidence supporting the various benefits of the project can be found somewhere in public records on the General Plan update process, but fails to state specifically what constitutes this substantial evidence. Findings The City makes the CEQA finding “pursuant to CEQA Guidelines section 15091(a)(3)” that specific considerations “make infeasible the mitigation measures or project alternatives identified in the Final EIR.” There are many hundreds of mitigation measures in the

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Final EIR that are summarized in Table ES-3. See Attachment H, pp. E11 through E-131. There are three project alternatives. The City fails to explain the rationale for its finding of

infeasibility in regards to each of the mitigation measures and project alternatives identified in the Final EIR as required by CEQA Guideline 15091(a). The finding also fails to describe the specific reasons for rejecting each identified mitigation measures and project alternatives as required by CEQA Guideline 15091(c). The City's CEQA Guideline 15091(a)(3) finding is not supported by substantial evidence in the record. Mitigation Monitoring & Reporting Plan The City must adopt a program for reporting on or monitoring the changes which it has either required in the project or made a condition of approval to avoid or substantially lessen significant environmental effects. These measures must be fully enforceable through permit conditions, agreements, or other measures. CEQA Guideline 15091(d). Mitigation Measure MM-GHG-3 is not fully enforceable as it is voluntary. Mitigation Measure MM-TRA-2 is not fully enforceable as it is voluntary. Mitigation Measure MM-TRA-1 has no program for reporting or monitoring in the MMRP. The City has no program for reporting on or monitoring the hundreds of "proposed policies" that it claims would reduce impacts. None of the five mitigations listed in the MMRP have been made "fully enforceable" through either permit conditions, agreements, or other measures. For all the reasons mentioned above, send the Appeal back with direction to address and correct these issues. RE: City of Pacifica General Plan Update (GPU) and Local Coastal Land Use Plan (LCLUP) and 2022 Draft EIR for the GPU Comments

### 3. In Regards to my comment letter of March 2, 2022

I wrote 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
- 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:

- A. Potential Environmentally Sensitive Habitat Areas (ESHA)
- B. Critical Habitat: California Red-legged Frog
- C. Other Sensitive Areas: 1. High Habitat Value/Threatened by Fragmentation  
2. Wildlife Movement Corridor

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2. Inconsistencies:

A. 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).

B. 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.

Considering all of the facts supporting inconsistencies exist, I hereby request that the City of Pacifica correct and update its relevant documents, in both the GPU, the LCLUP and the 2022 Final EIR, 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.

Please read the attached letters for a more complete understanding of the issues raised.

Respectfully,

William "Leo" Leon  
[REDACTED]  
Pacifica CA 94044

Attachments:

Leo Leon Letter March 2022

California Coastal Commission correspondence

July 8, 2022

Honorable Mayor and City Council Members

Appeal July 11, 2022 General Plan Update & Final EIR

Sent via email and public comments

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 ~~specifically~~ point out [specific](#) areas where information [in the LCLUP and General Plan Update](#) ~~are~~ inconsistent [and/or](#) missing, ~~and need to be~~ [and/or](#) ~~Figures used in the LCLUP and General Plan Update need corrected for the public and decision makers to understand the impacts of the Projection.~~

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 (~~Leo — attachment is dated June 12 2020; is this from Rhodes staff report 2; two versions on OneDrive~~)

In reviewing these ~~sc-both~~ [F](#)igures, I noticed inconsistency [and omissions](#) with areas described [in the Figures](#) as:

- A. Potential Environmentally Sensitive Habitat Areas (ESHA)
- B. Critical Habitat: California Red-legged Frog
- C. Other Sensitive Areas: ~~1~~. High Habitat Value/Threatened by Fragmentation  
~~2~~. Wildlife Movement Corridor

2. Inconsistencies:

A. ~~Neither GP~~ Figures 7-3 ~~nor 2022 Draft EIR Figure 3.7-3 does not~~ 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 \(GGNRA\)](#) ~~Figure 4-3. Analysis~~

B. ~~Neither GP~~ Figures 7-3, [2022 Draft EIR Figure 3.7-3](#) ~~and~~ Figure 4-3 ~~does not~~ show [1](#)) Sensitive and Critical Habitat ~~at for~~ 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](#) shows the undeveloped [field adjacent to San Pedro Avenue](#) ~~area~~ 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 area~~ adjacent to San Pedro Avenue.

### 3. Omission of Potential ESHA and Critical Habitat Information Possessed by the City.

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~~Neither GP Figure 7-3 nor 2022 Draft EIR Figure 3.7-3 nor the narrative discussions within the documents. These omissions do not~~ 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 ~~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 San Pedro Avenue ~~subject property~~’s western boundary. See Pages 6-12: 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, ~~the subject 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, ~~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.

This delineation showed that the adjacent watercourse that runs along the western edge of the undeveloped San Pedro Avenue site ~~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. ~~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 ~~subject property~~ and takes up approximately 0.048-acres at the northern border of the ~~subject property~~ (see delineation ~~of 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, ~~The delineation was prepared for the Applicant by Coast Ridge Ecology, LLC as part of the CDP application to the Coastal Commission.~~

~~2-19-0026 (Rhodes Mixed Use Development) Page 11~~

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~~ ~~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 ~~undeveloped San Pedro Avenue site~~ ~~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 ~~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 and reviewed~~ indicates that ~~undeveloped San Pedro Avenue site~~ ~~the area~~ 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 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 San Pedro Avenue site](#) ~~the subject parcel~~ 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

#### [2-19-0026 \(Rhodes Mixed-Use Development\) Page 12](#)

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, page 11](#)), Commission staff also concluded [ds](#) 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 [L](#)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 ~~proposed development~~ in ESHA, is ~~development which is not a resource-dependent use and it~~ would significantly disrupt habitat values. As a result, ~~development of undeveloped San Pedro Avenue site the proposed project was found 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 [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~~[Commission finds](#) that there is no location on ~~the site the part considered in that is 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~~[Commission finds](#) 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 both the GPU, ~~and the~~ LCLUP [and the 2022 Draft EIR](#), 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  
[REDACTED]  
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 CRLE

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**From:** KoppmanNorton, Julia@Coastal [ Sent: Tuesday, March 1, 2022 4:42 PM To: Public Comment [publiccomment@pacifica.gov] CC: Rexing, Stephanie@Coastal

**Subject:** General Plan Update & Sharp Park Specific Plan - DEIR Comments Attachments: FW: NOP - Pacifica GP Update & Sharp Park Specific Plan - Comments;

CCC Comment Letter 2018.08.31.pdf; CCC Comment Letter 2018.10.19.pdf; CCC Comment Letter 2019.11.22.pdf; CCC Comment Letter 2020.02.19.pdf; CCC Comment Letter 2018.08.29.pdf; Pacifica LCP Post-Consultation Draft Letter 2020.02.19.pdf Pacifica Comment Letters GPU, SPSP, DEIR, LUP

Pg/Par. (City Ref# ) Issue Topic

Pg 1/ Par1 (A6-1) As the LUP update has been submitted to the Coastal Commission but has not yet been certified, the originally certified LCP is the standard with which the GP/SPSP must be consistent. Once an updated LUP is certified, the GP/SPSP would have to be updated to then be consistent with the updated LCP. As such, generally, it may make the most sense to coordinate timing of the GP/SPSP for after the LUP is certified, given the outstanding nature of the LUP certification.

**Pg1/Par2 (A6-2)** More specifically, policies proposed in the GP/SPSP that correspond to coastal resources cannot contradict the certified LCP and thus Coastal Act. as we understand it, multiple policies proposed in the LUP update are duplicated in the proposed GP update (as denoted by a wave symbol), despite not being certified policies and numerous concerns regarding inconsistencies with the Coastal Act that have been noted to City staff over the years. Thus, 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) need to be made fully consistent with the currently certified LCP, and thus Coastal Act – currently, the policies noted as being included in both GP and LCLUP are not certified and thus not in effect in the Coastal Zone at this time. Further, the General Plan update appears to include policies that would only apply in coastal areas, including those pertaining to coastal access, coastal resilience, shoreline development, and allowances for shoreline armoring; these cannot be applied in the CZ as the LCP currently stands.

**From:** "KoppmanNorton, Julia@Coastal" < Date: Wednesday, September 9, 2020 at 1:07 PM To: "Murdock, Christian"  
**Subject:** NOP - Pacifica GP Update & Sharp Park Specific Plan - Comments

**Pg1/Par1-3 (A6-2)** More specifically, the analysis should include visual simulations, height and density alternatives, explanations of the hazards within this particular neighborhood, and the benefit to the public with regard to priority uses in this coastal area, and should consider: • Potential impacts if the proposed maximum height is reduced in areas in which tall buildings (up to 55 feet in height) will impact the visual character of surrounding areas as well as public views to and from the ocean in visually sensitive areas, and • Performing a thorough geotechnical analysis, including an evaluation of the potential hazards to this neighborhood (landslides and shoreline erosion) as well as a wave uprush study for the area. Such a wave uprush study should include an assessment of the potential hazards caused by 100-year storm events (cumulative with high tide events, as well as projected sea level rise impacts and given a typical eroded beach condition). In addition, any new General Plan and Sharp Park Specific Plan policies will need to be consistent with the LCP, and should not lessen protections or conflict with policy protections for coastal resources in the LCP. Please let me know if you have any questions. We look forward to continuing to work with the City on this CEQA process.

**From: Jeannine Manna North Central Coast District Manager California Coastal Commission, Letter Dated: August 31, 2018 to: Tina Wehrmeister, Planning Director**

This letter is in response to the City of Pacifica's request for comments on the "Proposed Updated Draft LUP Hazard Policies" provided to us in a memo from ESA to the City (entitled "Sea-Level Rise Policy Options for Pacifica LCP Update" and dated August 24, 2018). We note that we received this document just this week, and you have requested comments by today. As discussed with you, due to that abbreviated timeline of just a few days, we won't be able to provide final or comprehensive comments, but we are happy to provide some preliminary thoughts and some broader observations regarding the current proposed policies. We look forward to continued dialogue on the policies, including with respect to refinements identified herein. Note: No GPU SPSP DEIR LUP comments

**From: Julia Koppman Norton, Coastal Planner, North Central Coast District Office, California Coastal Commission, Letter Dated: November 22, 2019 Pacifica Planning Department Attn: Tina Wehrmeister**

**Page 3 Par 3-4:** In terms of the Land Use and Development chapter, we recommend: 1) ensuring that all figures, numerical references, and maps regarding existing and proposed land use patterns are accurate and up to-date; 2) adding language regarding maps/diagrams to indicate that they are illustrative and for planning purposes only; 3) adding directive policies requiring new development to demonstrate that there are adequate public services to serve such development, examples of which were previously provided to the City; 4) adding up-to-date neighborhood-specific traffic, hazard, visual character, and coastal planning constraints as outlined in the 1980 version of the LUP; 5) including further detail about sites with known development constraints (i.e. the Quarry and Pedro Point field); 6) prohibiting increases in density of land use in hazard and sensitive resource areas; 7) redesignating areas with severe development constraints to the Conservation land use designation, including lots adjacent to the bluff edge where homes and apartments were recently removed; and 8) providing a figure that indicates all proposed changes to existing certified land use designations.

Within the Environmental and Scenic Resources Chapter, in general, more recent sources and information should be referenced, and internal references should only be made to maps and documents that are part of the LUP rather than to other City documents. More specifically, the relationship between wetlands and environmentally sensitive habitat areas (ESHA) warrants further discussion. For example, while not all wetlands are ESHA, wetland policies are applied to all wetland areas, which should be stated explicitly.

**Page 4 Par 1-2** Further, the draft LUP should cite and recognize Coastal Commission regulations that City of Pacifica Comments on the City's Draft LUP Update November 22, 2019 4 more clearly articulate the requirement for a one-parameter criteria for wetland delineations which is applied in the coastal zone, contrasting this with the USACE three-parameter approach. It should also be noted that because the National Wetlands Inventory (and similarly, any map provided or prepared by the City) are not all comprehensive, on-the-ground conditions will prevail. Discussions on ESHA should also: 1) include policies on 'especially valuable habitat' as defined by the Coastal Act, which captures natural resources not considered rare but that have some other particular value (e.g. unusually pristine conditions, vegetation supporting other sensitive species, wildlife corridors, etc.); 2) remove references to degrees of habitat value without definition, as an area can be severely degraded and still constitute ESHA if it can be restored and/or is supporting sensitive resources; 3) categorically designate dune habitats as ESHA; 4) reorganize and bolster the 'Plant Communities and Wildlife Habitats' section for consistency in terms of vegetation types and levels of specificity and relevance; 5) consider habitat not defined by vegetation communities including bluff faces, offshore rocks and islets, and dunes; 6) articulate why seasonal wetlands are included under ESHA; and 7) explain that all riparian habitat should be treated as ESHA, while clearly articulating the differences between streams, creeks, riparian vegetation, and riparian corridors. In addition, minimum buffer requirements should be established for sensitive habitat areas including wetlands and ESHA,

including streams, and any uses allowed within such buffers should be specified. Moreover, a defined limit should be established for any exceptions to such minimum buffer requirements resulting in a buffer reduction. Exceptions to such buffer requirements should be supported by a biological report demonstrating that the adjusted buffer, in combination with incorporated siting, design or other mitigation measures, will prevent impacts that significantly degrade the wetland and/or ESHA and will be compatible with the continuance of the wetland and/or ESHA. Buffer adjustments should also be limited to where the entire subject legal lot is within the buffer or where it is demonstrated that development outside the buffer would have a greater impact on the wetland and/or ESHA. For both perennial and intermittent streams, buffers should be measured from the outer edge of riparian vegetation where it exists; if it does not, the buffer should be measured from the edge of the bank; and if there is no bank, the buffer should be measured from the mid-line of the watercourse. With respect to impacts and mitigation, impacts to coastal resources must always first be avoided to the maximum extent feasible, then minimized, then mitigated for. As such, compensatory mitigation requirements for impacts to sensitive habitats that cannot be avoided should be addressed in this document. Further, the City should consider defining temporary versus permanent impacts- where temporary impacts are those that would be resolved within 12 months, and do not include earthwork or other significant disturbance, with impacted vegetation restored to equal or better including that similar age/size structure of the community is restored.

**From: Jeannine Manna, District Manager North Central Coast District Office, California Coastal Commission  
Letter Dated: February 19, 2020. Pacifica Planning Department Attn: Tina Wehrmeister, Subject: City of Pacifica Post-Consultation Draft Local Coastal Program Land Use Plan Update**

**Pg1/Par2** Specifically, we recommend that the City include the more nuanced language we recommended regarding the following topics: recognition of non-perennial resources within the creeks, wetlands, and coastal waters implementing policies, riparian buffers (ER-I-1), potential environmentally sensitive habitat area (ESHA) designation (Section 4.3, “Plant Communities & Wildlife Habitat”), intermittent creeks and streams (ER-G-7), verification of ESHA (ER-I-23), and management of ESHA (ER-I-24) to ensure protection of sensitive habitats and species throughout the City consistent with the Coastal Act resource protection policies.

**Pg1/Par3** With regards to the natural hazards and coastal resilience policies (Chapters 5 & 6), the City has modified and/or added new definitions for “new development,” “existing structure,” “substantial exterior structural modification (SESM)” (the City’s proposed definition to qualify the concept of “redevelopment”), and “shoreline.” The application of these new definitions throughout the proposed policies raises inconsistencies with Coastal Act hazard policies 30253 and 30235 which require new City of Pacifica Comments on the City’s Draft LUP Update February 19, 2020 2

**Pg3/Par1** development to ensure long-term structural integrity, minimize future risk, and to avoid landform altering protective measures; and, with the exception of coastal-dependent uses, limit the construction of shoreline protection structures to that required to protect existing structures or public beaches in danger from erosion when designed to eliminate or mitigate adverse impacts to shoreline sand supply. Specifically, these new definitions limit application of the City’s hazard policies depending on the nature and location of the proposed development, and expand allowances for shoreline protection as further described below.

**P6/Par3-4** Lastly, it has come to our attention that there are numerous shoreline protection structures in the City, both publicly and privately owned, that are unpermitted and/or have existing permits that have since expired. Please take note of this in considering policies regarding shoreline protection structures that provide allowances for active, permitted shoreline protection structures specifically. As discussed above, this letter is not an exhaustive list of comments on the post-consultation draft of the LCLUP, but rather provides an overview of overarching feedback at this time. We again thank you and your staff for the thoughtful and collaborative work done to date, and appreciate and commend the City for moving forward with the sometimes difficult, but important, task of updating the LCP’s LUP.

## GPU - DEIR- SPSP – LUP

**P6/Par3-4 (Con't)** We look forward to continued collaboration, and helping the City to refine the draft LUP, and a future draft IP, including in the ways identified in this letter. We hope these comments help move us forward to this end. If you have any questions or would like to discuss these matters further, please don't hesitate to contact me



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**From:** Lori Yap [REDACTED]  
**Sent:** Sunday, July 10, 2022 6:51 PM  
**To:** Public Comment  
**Subject:** Agenda Item #2 - Special Meeting July 11

**[CAUTION: External Email]**

Dear Pacifica City Council,

After many years and lots of hours of dedicated service by Pacifica employees, representatives, individuals and citizen input, I am very appreciative that we are close to having a new General Plan in place. Thank you to all who have contributed their expertise.

With regards to this appeal, I would also like to support strengthening the safety portion of the General Plan, especially to address concerns regarding fire, landslides and evacuation. It seems logical that updating some of the maps in the General Plan would help to achieve this goal. We have experienced fire and landslides in our neighborhood over the years and it is fairly certain that it will continue and most likely increase. Evacuation is a major concern as there are limited exit routes available for the number of people and vehicles if this becomes necessary.

Thank you for listening to the voices of Pacifica residents to make our General Plan even stronger for future decisions that will need to be made.

Respectfully,

Lori Yap  
Cape Breton Drive  
Pacifica

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**From:** Fuat [REDACTED]  
**Sent:** Sunday, July 10, 2022 10:40 PM  
**To:** Public Comment  
**Subject:** 7/11/22 agenda item #2

**[CAUTION: External Email]**

**7/11/22 agenda #2**  
**Fuat Aygun**

**Dear Pacifica Council,**

**This is with a great concern I am addressing lack of details regarding safety element and absence of accurate maps and not blank ones. I urge you to send these items back to the Planning Commission for revision and reconsideration.**

**The fears of our neighborhoods, especially in my Neighborhood (Cape Breton Drive) remain unanswered. Ironically Park Pacifica was designated as 'special' district for low density and nature preservation.**

**Increasing traffic, extreme fire danger and lack of evacuation routes bear heavily on our minds. I vividly remember the northern hills behind our home ablaze! And of course the disastrous land/mudslide of January 4th, 1982. Homes and 3 children perished just around corner from us on Oddstad Boulevard!**

**The horror of that night is etched in my mind. I was returning home that night and found myself stuck behind emergency equipment and fire trucks with large lights illuminating the disaster sight. Rain was pouring incessantly and the streets were flooded. It was a long tragic night for everyone !**

***I sincerely hope not to encounter anything like that for the rest of my life.***

***I ask the Council to do the right thing !***

***Sincerely, Fuat Aygun.***

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**From:** Susan Leiby [REDACTED]  
**Sent:** Monday, July 11, 2022 7:50 AM  
**To:** Public Comment  
**Subject:** Comments re: Pacific General Plan

**[CAUTION: External Email]**

Hello,

I'm a resident of the Park Pacifica/BOV neighborhood. I just want to mention that I appreciate the hazard-assessment appeals that Mark Hubbell and Christine Boles have submitted. It seems that the Planning Commission is not doing the due diligence that they should be, at least for our part of town.

Regarding evacuation routes, it would be nice to have a plan for residents to know where to go (maybe there is a plan, I just don't know it). As far as getting out of the areas, we only have a few possibilities (e.g. Linda Mar Blvd, Terra Nova Blvd) and hopefully at least some of them would be unblocked during an emergency.

Thanks for your consideration.

Susan Leiby  
[REDACTED]

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**From:** Lisa Funkhouser [REDACTED]  
**Sent:** Monday, July 11, 2022 10:34 AM  
**To:** Public Comment  
**Cc:** Lisa Funkhouser  
**Subject:** Agenda Item #2 - Special Meeting July 11, 2022

**[CAUTION: External Email]**

Dear Pacifica City Council,

Thank you for putting in the many hours necessary to develop a new General Plan. Having said that, it is important not to approve the General Plan without complete safety maps.

As the City is aware, last fall there was a landslide at 650 Cape Breton Drive after a relatively nominal amount of rain. Anything more significant could have impacted not just those property owners but surrounding property owners as well. Having maps with past landslide information is only part of the answer--those maps must also include flow risk areas and must cover Pacifica in its entirety.

I support the efforts of this appeal to strengthen the safety portion of the General Plan. I live at the end of Cape Breton Drive and have significant concerns about fire, landslides and, especially, evacuation in the event of an emergency. I would like the City to recognize these concerns by including updated and complete maps in the General Plan.

Thank you for your consideration.

Respectfully,

Lisa Funkhouser  
Cape Breton Drive  
Pacifica

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**From:** Suzanne Moore [REDACTED]  
**Sent:** Monday, July 11, 2022 10:56 AM  
**To:** Public Comment; Bier, Mary; Bigstych, Tygarjas; Beckmeyer, Sue  
**Cc:** suzanne Moore  
**Subject:** Appeal to General Plan, City Council Special meeting 7/11/22  
**Attachments:** Appeal to GP.docx

[CAUTION: External Email]

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## General Plan Appeal

Community safety is the task of every Pacifica resident. Safety concerns us all and is of paramount importance to a Community's well being and existence. We need to look no further than the tragedy of Paradise CA to do all we can to prevent this from happening in Pacifica. We need to look no further than the tragedies of Pacifica children lost in a landslide to do all we can to prevent this from recurring.

I am grateful to the appellants for taking their time as Pacifica residents to alert us to ways to improve our General Plan. By providing updated maps that demonstrate fire and landslide risks, our General Plan is a better resource for us all. The information from the appellants is compelling; and although city staff feel they have met necessary requirements, our General Plan should be the best it can be NOW to provide community safety.

If city staff input and update fire and landslide maps currently available, it can potentially save lives. I support the appellants and requests the Safety Section of our General Plan be updated with current maps. Community safety is the task of every Pacifican, and our Council and staff can model that duty. Thank you.

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**From:** deni asnis [REDACTED]  
**Sent:** Monday, July 11, 2022 11:49 AM  
**To:** Public Comment  
**Subject:** City Council Meeting 7/11/22, Special Meeting, I. Study Session #2 Public Hearings Consideration of an Appeal of the Planning Commission's Recommendation for City Council Approval of a GP Update

**[CAUTION: External Email]**

My name is Deni Asnis. As a Rockaway resident of Pacifica for over 10 years, I am writing to support the appeal of the General Plan (GP) and Sharp Park Specific Plan (SPSP) for several reasons.

One of my greatest concerns is the GP impact on housing. Pacifica is in dire need of low cost and very low cost housing and there are ways to implement this through a changed GP. Several local examples can guide Pacifica in this: the Homekey programs in Half Moon Bay and Redwood City provide interim housing with wraparound services; Life Moves and Dignity Moves utilize government-owned land as a site for temporary housing and provide supportive housing and safe parking.

Let us not forget that most of the houseless people living in Pacifica are local: friends, neighbors, part of our extended community. We can do what is needed in Pacifica to provide equitable and just low cost housing and maintain our magnificent hillsides and coastal views at the same time.

Another concern I have about the GP is related to landslides and fires. It is crucial that all the studies and information regarding geographical/topographical considerations relating to the safety and well-being of all residents and visitors in Pacifica be carefully analyzed and understood. A thorough understanding of potential hazards involved in any development and infrastructure plans is critical in keeping Pacifica safe and intact, as always valuing the lives of people over any potential profits.

I implore you to support the appeal to the GP and SPSP plans and act in the interests of the people of Pacifica.

Thank you,  
Deni Asnis

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**From:** Jacqui de Borja [REDACTED]  
**Sent:** Monday, July 11, 2022 2:29 PM  
**To:** Public Comment  
**Subject:** Agenda Item #2 at 5:00 pm on 7/11/2022

**[CAUTION: External Email]**

Hello,

My name is Jacqueline de Borja. I'm writing to ask for accurate maps and policies, as well as proper zoning, in order to keep my family and the rest of the Pacifica community safe. My family and I live in a home with the Milagra Ridge in our backyard. I want to ensure it is safe from both landslides and fire.

Thank you,  
Jacqueline de Borja

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# **Public Comments**

## **Oral Communications**

Written Comments Received By 12pm on 7/11/2022



*July 11, 2022*

*City Council Regular Meeting*

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**From:** Clif Lawrence [REDACTED]  
**Sent:** Wednesday, July 6, 2022 11:59 AM  
**To:** Public Comment  
**Cc:** Clif Lawrence  
**Subject:** City Council Agenda July 11,2022 - Open Communications

**[CAUTION: External Email]**

## **City Council / Staff secrecy**

What justifies the continued veil of secrecy surrounding the events and facts related to the proposed sale of a portion of a City owned property? Specifically, that portion of 540 Crespi Drive, sometimes identified as "Part 5", or the "eastern 55 foot width." which abuts 570 Crespi Drive.

- What preceded negotiations between the Murphy brothers and the City of Pacifica regarding the possibility of this transfer of City owned property?
- Was this portion of 540 Crespi Drive ever declared as "surplus" property?
  - (Executive Order N-06-19)
- Does the City of Pacifica have land(s) which it annually reports to the State as "Surplus Lands"?
  - (AB 1255, Robert Rivas, 2019)
- Was that portion of land ever offered to any non-profit for the purpose of low income housing?
  - (AB 1486, Ting, 2019)

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**From:** Bill Tobin [REDACTED]  
**Sent:** Sunday, July 10, 2022 10:11 AM  
**To:** Public Comment  
**Cc:** Bier, Mary; O'Neill, Mike; Beckmeyer, Sue; Vaterlaus, Sue; Bigstych, Tygarjas  
**Subject:** Oral Communication for City Council Meeting 7/11/2022

**[CAUTION: External Email]**

To the City Council of The City of Pacifica;

Respected Council members and Mayor Bier,

I am writing to voice my opposition to the selection of Ridgeway Drive and Lundy Drive as suitable streets for the housing of multiple Oversized Vehicles and to the unlawful process by which this entire plan was made.

The selection of acceptable streets for RV parking was made in closed sessions without opportunity for public input which is in violation of the Brown Act. This subject of street use is neither a legal, nor personnel item for the city and therefore not to be held behind closed doors.

Furthermore, the resulting plan was crafted in haste, arbitrary in nature and is fraught with multiple contradictions to existing traffic regulations [Sec 4-7.1205(a)(2)] pertaining to proximity to uncontrolled intersections; and existing approved street use plans [Sec 4-7.1205(a)(3)] pertaining to an approved bike lane on Ridgeway Drive. Also, current listings on the City's web site designate the entire length of Lundy Way as disallowed for OSV parking.

I find it most interesting that "No Oversized Vehicle Parking" signs have already been placed throughout the city along roadways which could easily accommodate such use without infringing upon established residential neighborhoods. (Palmetto, north of Esplanade for example. Very nice views, too I might add.)

We tax paying, property owning citizens of Pacifica have every right to be concerned with who is in our neighborhoods while we are at work and to expect our governmental officials (police) to know and be allowed to enforce the laws already established. They have been instructed to not enforce specific laws pertaining to the 72 hour regulation. This plan will grant unlimited access to our neighborhood by anyone, from anywhere in the US, who may or may not be drug addicted, felons or sex offenders with close proximity to neighborhood children and the local park.

Some questions to be considered:

Who will enforce basic sanitation laws? Will the city allow enforcement of traffic laws (72hrs)?

What, exactly, constitutes "moving a vehicle" to be in compliance with this 72 hour time limit?

Who will clean the bathrooms at the park? How often? Who will pay for these extra services?

Whose city budget will get cut for these funds? Schools? Parks? Police?

Your salaries?

Will the County or State compensate us for these services we are being forced to supply by outside interests?

Why only the East side of Fairway? Why nothing on the West side?

Why, then, are we limiting it to only 2 miles of allowable space?

What, really is wrong with the old water treatment site? Someone getting kickbacks?

Why not open the entire city with 40' wide streets to OSV parking, so as to be just and fair to all parties? (as I'm sure that fairness is a cornerstone of each of your core personal values)

Which constituency do you represent?

Who's money is behind all this?

This plan is a bad plan; hastily, arbitrarily, and deceitfully concocted without consideration for its impact upon the communities affected and with bias toward certain areas of our city over other areas. This is why Environmental Impact Reports are necessary.

This concept could work. Pacifica, as a community, could be considered as helpful to those in need. That would be nice. This plan will not provide that. As it stands, we are going to look like the area around SF State and Lake Merritt in the City. There are no provisions for vetting backgrounds, or employment, or security for residents or mitigating waste. Again; who pays for it? We have the right to know this.

We Pacificans are being forced to accept what other localities are unwilling to permit. We are being bullied from the outside and we will not be silent, nor complicit. It is time the City Council stand their ground and represent Pacifica and its citizens.

Respectfully,

William Tobin



Pacifica

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**From:** Dawn Reidy [REDACTED]  
**Sent:** Monday, July 11, 2022 7:58 AM  
**To:** Public Comment  
**Cc:** Bier, Mary; Bigstych, Tygarjas; moneill@pacifica.gov; Vaterlaus, Sue; sbecmeyer@pacifica.gov  
**Subject:** Oral Communication for 7/11/22 Pacifica City Council Meeting

[CAUTION: External Email]

Submitted by Dawn and Marty Reidy  
[REDACTED], Pacifica

Our family has lived in Pacifica since 1989. We have enjoyed living here and felt very fortunate. Our neighborhood of East Fairway Park has always felt like a close knit, safe community. I feel like that safety is now in jeopardy due to the City of Pacifica's RV Parking Program. The **lack of transparency given to the residents** by the leaders of Pacifica is unbelievable and unconscionable. Leaders are elected by the residents to represent their constituents. **Is it true the City Engineer was given absolute power in selecting the streets to be included in the approved list? Please, City Council members confirm or deny this last point.** The decisions made by this City Council behind closed doors feel like a betrayal and do not represent the residents of Pacifica. The City Council obviously did not consider some very important questions when they approved RV parking on **residential** streets. Who are these people who can park on our streets? They are not vetted. How do we know

they are not dangerous individuals? What are we to do when they leave garbage or even worse, waste? What will the impact be on our environment? **Why was there not an EIR generated?**

We recently received a "Community Update maintaining YOUR Vital Services" flyer in the mail. To quote one paragraph "As a full-service city, we are striving to maintain essential services such as public safety, roads, and protect local resources that make Pacifica a unique, special place to live, work and play." RV's parking in our own neighborhood will not make it safe, it will not positively affect our roads (streets), it will not make my neighborhood a special place to live, it will not make my park (Fairway Park) a special or even safe place to play. **The ramifications of the RV program in our neighborhoods is in complete contrast to this community update flyer and reflects the negligence of our community leaders to their own stated commitments and promises.**

Are the City Council and the other Pacifica city leaders willing to work with the residents of Pacifica to find a better solution to the RV issue? We need solutions that represent the residents and the unhoused we find sharing our community.

Respectfully,  
Dawn and Marty Reidy

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**From:** Coffey, Sarah  
**Sent:** Monday, July 11, 2022 10:04 AM  
**To:** Public Comment  
**Subject:** FW: Agendas

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**From:** Bob [REDACTED]  
**Sent:** Saturday, July 9, 2022 1:24 PM  
**To:** Coffey, Sarah <scoffey@pacifica.gov>  
**Cc:** Mike O'Neill <[REDACTED]>; Bier, Mary <mbier@pacifica.gov>; Beckmeyer, Sue <sbeckmeyer@pacifica.gov>; Vaterlaus, Sue <svaterlaus@pacifica.gov>; Bigstyck, Tygarjas <tbigstyck@pacifica.gov>; Michelle Kenyon [BWS Law] <mkenyon@bwslaw.com>; Clay Lambert <clay@coastsidenewsgroup.com>  
**Subject:** Agendas

**[CAUTION: External Email]**

Hello Sarah how are you ? Mr Blum mentioned there's a city council code of conduct or decorum rules somewhere. Do you know where that's at?

1. So I can't view or get any agendas to download been trying for three days and on different machines and my phone and somebody else said they have the same issue. Also it looks like we've outsourced the agenda posting and now the format for listing them doesn't show half the information like the minutes or interactive options like, you had up there before. But more importantly and more troubling are these zoom meetings because there's no instructions I can see on the interactive agenda at least and there's no indication these are zoom only meetings. I'm sure people are showing up at council chambers because there's no indication they aren't meeting there. Whoever the city outsourced this to they have dropped the whole enchilada.

2 According to the legislation that the city is relying on to hold these virtual meetings "the county health officer or county health must be recommending social distancing in order for council to be able to regress to virtual meetings. Nowhere on county health's site do they currently even mention social distancing. Here's the counties COVID 19 best practices <https://www.smchealth.org/post/covid-19-prevention-strategies>

Why does the city repeatedly stick its neck out begging to be sued. Like with the flavored nicotine oil or whatever it was. You're begging big tobacco to sue like you begged the ACLU to sue over outlawing the homeless. Why do you be

3 This is all extremely serious and highly illegal. It's basically hiding these meetings from the public and every action taken could be challenged and voided as well as possibly mistameanor charges filed. And why the heck do they want to go back to zoom meetings anyway. No other city I can see is doing it. Well pAcifica is a leader. We have some of the worst financial outlooks of any city on the state treasurers website (thanks to the civic center campus project and Mr Woodhouse)

4, I'd like to include the text below as a public comment on item #6 at Monday's meeting)

What the heck are people thinking down there. City Hall is out of control I see you've gone back to virtual meetings again and before you have even voted to do so. which is not legal because our county health officer has no order for social distancing nor is their one mention on the county health website recommending social distancing. <https://www.smchealth.org/post/covid-19-prevention-strategies> On top of that the city is illegally not providing proper notice or any instructions to view or participate in the illegal virtual zoom meeting. There's not even any indication these ARE zoom only meetings This is extremely serious and could result in the nullification of any gore or action taken at these meetings which are pretty much closed to the public

If you guys are as concerned (which your actions show you're not) as you say you are about COVID 19 then put more than a pitiful rudimentary list of government contacts for to stay safe during the pandemic. Take a look at the city of san Bruno's website. They actually show they care and put in some effort to educate their citizens. They have links but also include current news and information as well as safety tips right on their website.

Bob Hutchinson  
Reese Advertising  
Pacifica CA

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July 11, 2022

To City Council & Staff

540 Crespi Drive

Pacifica, CA. 94044

Re: Meeting July 11, 2022 @ 7:00 P.M.

Oral Communication – Ridgeway, East Fairway Park- Floran Kepic

I believe you have violated the Brown Act in finalizing a list of neighborhood streets  
In a 2 miles of city streets, allowing OSV people to park and live for 72 hours before  
having to move...and then they only have to move about 5 feet!

Also, believe you have violated the California Environmental Act by not ordering a  
Environmental Impact Report, which effects safety for our children, Little League  
Players and our neighborhood.

We need to start from the beginning regarding ALL decisions made illegally, in closed door  
Sessions. (See the Brown Act) This will allow all residents to be informed of your actions.

Sincerely,



Floran R. Kepic



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**From:** Cynthia Bradford [REDACTED]  
**Sent:** Monday, July 11, 2022 11:59 AM  
**To:** Public Comment  
**Subject:** Council Meeting 7/11/2022 Oral Communications

**[CAUTION: External Email]**

My name Cynthia Bradford

To all Council Members,

The information to allow RV Parking on residential city streets has been few and far between. The 13 spots for vetted RV dwellers is about as much information that people have heard about. Meanwhile the 2 miles allotted for unvetted RV dwellers has been hush hushed behind city councils closed doors. That would allow approximately 350 30foot vehicles onto our residential streets. The streets they have chosen for the 2 miles was never noticed to any of the populous to the residence who reside on those streets. Pretty much the city council have thrown their constituents under the bus. The safe parking mentioned is only regards to traffic safety no regards to humane or environmental safety. An EIR is a must.

Cindy Bradford

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# **Public Comments**

## **Agenda Item 1 – Adjourned Special Meeting**

Written Comments Received By 12pm on 7/11/2022



*July 11, 2022*

*City Council Adjourned Special Meeting*

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**From:** Dennett Ingram [REDACTED]  
**Sent:** Tuesday, June 28, 2022 7:19 PM  
**To:** Public Comment  
**Subject:** Comments on proposed City Draft General Plan

**[CAUTION: External Email]**

Hi there,

Part of the draft changes will cause a great problem to a very small group of individuals. In the Rockaway area, there is a 200' long stretch of land between Calera Terrace and the north end of the sub division, which contains lots 7 through 54 inclusive of the map of "Rockaway Beach San Mateo County, California Subdivision 1". The new general plan will change the zoning of the subdivision for just this small area at the bottom of the hillside from Very Low Density Residential to Open Space/Agriculture/Residential. While 6 houses are already built in that area, this change would make that area completely unbuildable for those individuals who own that small tract of land. This is because O.S.A.R. space has a maximum density of 1 unit per 5 acres, and there is not 5 acres left of land in the Rockaway Beach subdivision to qualify for a single residential unit, even if all the existing lots were pooled together.

I propose an amendment to the Pacifica City Draft General Plan to help prevent undo hardship to the owners of those properties, as well as prevent the possibility of legal action against the city for the change. The amendment could be either of the following:

1) Land previously Very Low Density Residential that is changed to a different classification may still qualify for a minimum of one residential unit per parcel on existing parcels, even if this exceeds the maximum density of the new Land Use Plan, as long as the parcel was not subdivided after the new Land Use Plan goes into effect, and so long as the owner of the land has not changed since the the new Land Use Policy went into effect, and the unit meets all other requirements for code and building for the zoning in which it belongs.

This would be a global catch all that would show the City's intent to not cause harm to any landowner, and allow any and all existing owners of land to not be harmed by the City's global change of zoning with the new plans.

2) Would be to simply change the boundary of the new Open Space/Agriculture/Residential district in the Cattle Hill / Rockaway Subdivision area to end at the edge of the Rockaway Subdivision, instead of extending the extra 200' to Calera Terrace. This would fix the issue for this one specific tract of land. And instead leave that area as Very Low Density Residential.

If you have any additional questions, feel free to ask. Thank you!

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**From:** O'Connor, Bonny  
**Sent:** Tuesday, July 5, 2022 10:40 AM  
**To:** Public Comment  
**Subject:** FW: Homeowner Questions

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**From:** Rik Galan [REDACTED]  
**Sent:** Friday, July 1, 2022 5:06 PM  
**To:** Murdock, Christian <cmurdock@pacifica.gov>; O'Connor, Bonny <boconnor@pacifica.gov>  
**Subject:** Homeowner Questions

**[CAUTION: External Email]**

Hi Christian and Bonny

Hi

I am a new homeowner in Pacifica and I have a few questions comments about the Plan after reviewing things. Thanks for all the hard work you have put into this Plan process. Just reviewing things now and it seems a lot work been done by your team.

1. **Sea Wall**—Is the wall replacement been approved or how is that process going to work for the Sharp Park area? Is funding there? What is timeline to start construction?
2. **Eureka Shopping**—What is the plan for this area? It discusses multi house development but is there any specific planned for this shopping center area?
3. **Multiuse on Palmetto**—In one of the videos online it discussed focus on studios and 1 bedrooms for affordability. Curious if you want to increase the demographic diversity in the area why not also plan for some larger 3 bedrooms for families. It seems that focus is mainly for single, couples or seniors.
4. Where can I find info on how you plan to address traffic in the Sharp Park area around Eureka Shopping if you are planning more development?

Thanks so much,  
Richard

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**From:** Vicki Sundstrom [REDACTED]  
**Sent:** Monday, July 11, 2022 10:21 AM  
**To:** Public Comment  
**Subject:** Submitting all the transportation/traffic issues relevant to the GPU and related documents  
**Attachments:** Gmail - Intersection -- LockhavenManor et. al..pdf; changes-2.pdf; Re Safety concerns on Manor.pdf; Gmail - Public Comment - Pacifica General Plan Update, EIR & Sharp Park Specific Plan. Hearing on 6 \_25\_2022.pdf; Traffic signals for HickeyGateway - follow up.pdf; Pacifica Transportation analysis & measures.pdf; Pacifica Quarry DEIR.pdf; Pacifica DEIR rev.pdf

**[CAUTION: External Email]**

Submitting all the transportation and traffic related issues with the General Plan and related documents.

Please address and act in the interest of the people who live here. It takes many years to work through traffic and transportation issues but the first step is to acknowledge them - you have failed to record the issues.

Respectfully,

Vicki Sundstrom  
Fairmont

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Posted on Pacifica website – 4/2021

	Intersection	Control	Peak Hour	Existing		Plan Buildout (2035)	
				Delay <sup>1</sup>	LOS <sup>2</sup>	Delay <sup>1</sup>	LOS <sup>2</sup>
CMP Intersections	1 Hickey Boulevard / SR 35	Signalized	AM	65.0	E	127.9	F
			PM	71.8	E	116.6	F
	2 Reina del Mar Avenue / SR 1 <sup>3</sup>	Signalized	AM	175.0	F	211.7 (140.5) <sup>4</sup>	F (F) <sup>4</sup>
			PM	135.5	F	236.3 (150.6) <sup>4</sup>	F (F) <sup>4</sup>
	3 Fassler Avenue / SR 1 <sup>3</sup>	Signalized	AM	93.8	F	143.3 (72.7) <sup>4</sup>	F (E) <sup>4</sup>
Non-CMP Intersections			PM	94.3	F	155.1 (79.6) <sup>4</sup>	F (E) <sup>4</sup>
	4 Crespi Drive / SR 1	Signalized	AM	25.4	C	38.2	C
			PM	18.3	B	48.7	D
	5 Linda Mar Boulevard / SR 1	Signalized	AM	65.1	E	83.1	F
			PM	107.0	F	96.0	F
	6 Hickey Boulevard / Gateway Drive	AWSC <sup>5</sup>	AM	68.0	F	71.9	F
			PM	82.8	F	87.0	F
	7 Manor Drive / Palmetto Avenue <sup>4</sup>	AWSC <sup>5</sup>	AM	14.9	B	12.7	B
			PM	24.8	C	13.2	B
	8 Manor Drive / Oceana Boulevard <sup>4</sup>	AWSC <sup>5</sup>	AM	26.3	D	13.8	B
			PM	18.6	C	16.5	C
Non-CMP Intersections	9 Fassler Avenue / Crespi Drive	Unsignalized	AM	6.4		7.6	
			PM	1.4		7.4	
	NB Approach	Unsignalized	AM	49.1	E	60.2	F
			PM	21.4	C	62.7	F
	WB Left	Unsignalized	AM	8.1	A	8.3	A
			PM	9.4	A	8.2	A
	10 Fassler Avenue / Terra Nova Boulevard		AM	10.1		10.1	
			PM	4.1		13.3	
	NB Approach	Unsignalized	AM	20.5	C	21.7	C
			PM	13.4	B	26.2	D
Non-CMP Intersections	WB Left	Unsignalized	AM	8.0	A	8.1	A
			PM				

Discrepancies in analysis for the same locations. Also one location has been eliminated.

## In DEIR

**Table 3.2-4: Peak-Hour Intersection Operations Summary – Existing and Plan Buildout Conditions**

Intersection		Control	Peak Hour	Existing Delay <sup>1</sup>	Existing LOS <sup>2</sup>	Plan Buildout (2040)	
						Delay <sup>1</sup>	LOS <sup>2</sup>
CMP Intersections							
1	Hickey Boulevard / SR 35	Signalized	AM	41.7	D	50.8	D
			PM	39.1	D	50.8	D
10	Reina del Mar Avenue / SR 1 <sup>3</sup>	Signalized	AM	61.0	E	69.6	E
			PM	35.5	D	58.2	E
11	Fassler Avenue / SR 1 <sup>3</sup>	Signalized	AM	35.5	D	38.8	D
			PM	47.8	D	37.0	D
12	Crespi Drive / SR 1	Signalized	AM	12.2	B	14.7	B
			PM	7.1	A	9.7	A
13	Linda Mar Boulevard / SR 1	Signalized	AM	17.3	B	28.0	C
			PM	27.2	C	43.6	D
Non-CMP Intersections							
2	Manor Drive / Oceana Boulevard <sup>4</sup>	AWSC <sup>5</sup>	AM	18.0	C	63.1	E
	Signalized Build		PM	23.2	C	44.3	D
3	Manor Drive / Palmetto Avenue <sup>1</sup>	AWSC	AM	32.1	D	96.9	F
	Signalized Build		PM	23.0	D	71.7	E
4	Paloma Avenue/ Oceana Boulevard	AWSC	AM	66.6	F	48.4	D
	Signalized Build		PM	15.4	C	23.5	C
5	Paloma Avenue/ Francisco Boulevard	AWSC	AM	11.2	B	17.5	C
			PM	9.8	A	13.2	B
6	Paloma Avenue/ Palmetto Avenue	AWSC	AM	12.4	B	20.8	C
			PM	12.3	B	28.7	D
7	Clarendon Road/Oceana Boulevard	AWSC	AM	12.4	B	17.1	C
			PM	12.3	B	15.1	C
8	Clarendon Road/ Francisco Boulevard	AWSC	AM	9.8	A	11.9	B
			PM	10.2	B	11.6	B



Vicki Sundstrom [REDACTED]

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**Intersection -- Lockhaven/Manor et. al.**

1 message

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**Geoffrey Mathews** [REDACTED]  
To: dpwassistance@cl.pacifica.ca.us

Tue, May 24, 2022 at 12:11 PM

Good afternoon!

I'm writing in regard to the intersection of Lockhaven and Manor Drives. In short, a pattern has emerged of large pickups, commercial trucks and overnight vehicles parking bumper-to-bumper around the turn from Lockhaven onto Manor. This creates a hazardous and unnerving situation for myself, my wife and my neighbors — made even more so by the steep incline (my wife and I drive manual transmission vehicles). It's frequently a "pull forward and pray" situation exiting the neighborhood. We try to exit off of Claridge Drive, but while less-steeply inclined has similar parking issues along with people turning off of Skyline moving far too fast.

Would it be possible to paint the curbside red at the intersection to remind parkers that this is a hazard. Incidentally, there really is plenty of parking across the street from us and elsewhere in our neighborhood — people are just lazy. I think that the most relevant section of the CA DMV handbook (<https://www.dmv.ca.gov/portal/handbook/california-driver-handbook/parking/>) is "On a marked or unmarked crosswalk, sidewalk, partially blocking a sidewalk, or in front of a driveway."

Also, we're concerned about large trucks using Manor Drive as a thoroughfare. By large trucks, I mean 3 or more axles weighing upwards of 13000 lbs — not package delivery trucks, etc. 18-wheel moving trucks who have a destination on Manor are generally not a problem as they tend to self-regulate the hazard with cones, triangles, flags and the like and don't stay all day or all night. We're thrilled with all of the construction on Manor as people invest in our community and want to accommodate progress to the safest possible extent, but if there's anything that can be done to mitigate the risk to property, children, cyclists and pets posed by large through-traffic, please let us know how we can go about it.

You guys at DPW are awesome and we appreciate your service very much!

Kindest regards,

Geoffrey Mathews  
[REDACTED]



Vicki Sundstrom [REDACTED]

## Public Comment - Pacifica General Plan Update, EIR & Sharp Park Specific Plan. Hearing on 6/25/2022

1 message

Vicki Sundstrom <[REDACTED]>  
To: Public Comment <publiccomment@pacificagov>

Fri, Jun 24, 2022 at 11:17 AM

Submit to public record for - Pacifica General Plan Update, EIR & Sharp Park Specific Plan.  
Hearing on 6/25/2022

### Community Feedback on Pacifica Traffic/Safety issues

Speedway and illegal trucks on Manor from Skyline to Oceana. People cutting through business parking lots at Manor/Oceana and Manor/Palmetto because of backed up 4 way stops. Waiting through multiple signal lights at Hickey and Skyline.

The pic you posted above shows the N bound Ca 1 gap in the connection between Rockaway and the Bowling -Brewery businesses.

Many times I've witnessed people trying to walk or ride bicycles between the 2 business areas.

Getting together w Caltrans to implement a protected shoulder along this short stretch would be a welcome improvement and beneficial to locals and visitors alike to range between retail food-recreation locales.

Even something as minimal and non interfering with vehicular progress as the pictured design below would be welcome:



[Teeda Tangprasertchai Stiles](#)

Speeding on Palmetto past Walgreens revving up to enter Highway 1

Yvonne Walters I agree I think a stop sign at the entrance by crosswalk would help. There is always a accident when the oncoming traffic from pallmetto thinks it's a 4 way stop.

Fassler from Crespi to Hwy 1 is basically a freeway. Good luck to any pedestrians who need to cross it, or anyone trying to turn onto it. Lack of sidewalks on the north side sure doesn't help matters.

**Carl Nicolari** ^this -- I stopped for an older person trying to cross with their dog at the complex midway down the hill, and it was verrrry touch-and-go with people trying to drive around at high speed. Poor lady was clearly terrified. I was really worried it would cause a pile-up, but... it's her right-of-way! Maybe some pedestrian flashers like by Eureka Square? People do seem to respect those more.

Hwy 1 at Moose Lodge/Fairway....there's a crosswalk but no light to alert drivers to stop when people want to cross, no flashing lights to get peoples attention...it's very dangerous! Either there shouldn't be a crosswalk, a pedestrian bridge should be built or there needs to be a signal that turns red when people want to cross

Leslie Granillo a pedestrian bridge would be the best. We don't ever cross there, we will go down to the tunnel to cross

Flora Shell same! Too scary to try to do the hwy but I see people do it all the time, some with strollers!!!

The intersection, on manor Dr/palmetto needs a light it's very dangerous. (By wallgreens)

Noeleen Lang really bad! I have been in an accident there turning left because of someone pulling out of a parking spot

Minimal or lack of bike lanes (Oceana) or very narrow shoulders with growth from shoulder shrubs encroaching onto road, pushing cyclist closer into traffic lanes.

Is there a traffic control system at the intersection of HWY 1 and Fassler? I thought there was a system there in the past. If so, who removed it and why?

The intersection/bridge between the Mazzettis side of hwy 1 and the Walgreens side of hwy1 may be in the top 5 worst intersections in the state

Also beach side of rockaway onto hwy 1

John Mitchell agree on the Mazetti's intersection being dangerous, and this is coming from a Civil Engineer that knows about these things professionally. The plans I've seen for adding signals to these intersections look good. This is right next to a

school and there are no crossing guards.

Tiffany Button

John Mitchell this is the first one I thought of.

Like

Reply1 d

Karin Herrick-Smith

John Mitchell 100% agree Re that Manor- area intersection. Hella frustrating!

Julie Hong

The intersection of Oddstad and Everglades could have a 3 way stop 🛑. There's a 4 way stop sign at Oddstad and Big Bend, but not at Everglades which is a pass over road to Oddstad and gets much more traffic. People speed up and down Oddstad and people and cars have to dodge the speeders when coming off of or crossing near Everglades. A stop will help with the speeding as well.

Oh and Cape Brenton, with the parking, traffic, capacity and safety issues there!

[Alicia Garate-Golembiewski](#)

[Julie Hong](#) I'm at the bottom if Everglades

Juan Manuel Quiros Raffo

Julie Hong same goes for Terra Nova Blvd. to Everglades, that should also be a 3 way stop sign.

[Natalia Easton](#)

Fassler & Crespi intersection. Traffic from Crespi to turn left has no right to go. It's extremely busy intersection, especially during rush hours. It takes me up to 5 mins sometimes to turn left. Not only that, all parking spots on Fassler at intersection area usually taken and it makes it extremely hard to see incoming traffic and dangerous. I am highly confident that at least 4 way-stop sign should be installed there or traffic light.

Tiffany Button

Natalia Easton I second this one!

[Cody Bratt](#)

yes! Added this below before seeing it here. Easy problem to fix !

[Tané Maire Brunker](#)

Turning left onto highway 1 south from vallemar can take multiple light cycles depending on the time of day (especially when people are cutting in from the corner parking lot)

[Karen Seidman](#)

Speeding on Palmetto. Should especially focus on IBL and speeding in school zone

[Natalia Easton](#)

Rockaway to Fassler (cross highway 1) or turn left on HW1. Green light time is very short and very often only half of cars able to turn/cross, or even 1/3, as line could be as long as the end of the street (where ocean starts) and remaining cars have to wait for another green light (which doesn't come that often). When pedestrian crosses HW1 - it makes the light to stay green for 30 secs. This is lucky moment for people at the end of that car line, because they have enough time to cross.

[Mayuran Tiruchelvam](#)



There is space to have two lanes on the Rockaway side of that intersection.

1. For left turns onto highway 1 north

2. For folks going straight across to Fassler.

Pacifica recently repainted the intersection to make it very specifically ONE lane for both northbound and eastbound traffic.

[Karen Rosenstein](#)

[Mayuran Tiruchelvam](#) Glad they did as for too many times I'd be in that "left lane" going across to come into Rockaway proper when someone would pull up next to me also aiming for the left uphill lane on Fassler. Tried talking to other drivers while waiting for the light when this first started happening and was basically told to go someplace hot. Was happy to see the lane painted in.

[Natalia Easton](#)

Yes, making it ONE lane even made the situation way worse. In before 1 lane more cars could go (some left, some uphill from right lane) simultaneously. Now, only 1 car at a time can go and that line of cars got even longer.

Mayuran Tiruchelvam

Karen all they need is a turn arrow in the left lane and a straight arrow in the right.

The rudeness of other drivers is a curse on all of us (as is the problem that American cars keep getting bigger and wider).

[Debra Etienne](#)

Cars turning left onto Fassler from Terra Nova Blvd have to wait n wonder if folks are turning right onto TN and aren't signaling or are they going straight onto upper Fassler? Maybe not enough room but it would be great to have an auto turn right onto TN n a stop for those going straight.

[Emma Brady](#)

chronic parking/car storage in the fire lane on Elder Lane

Lisa A Funkhouser

The intersection at Linda Mar and Hwy 1 has two dedicated right turn lanes from LM onto Hwy 1 north. This causes the left turn lane to get backed up with cars that want to go straight or south. That back up can cause cars to wait at the shopping center light for 3-4 cycles or more. If the middle lane were changed to allow cars to go straight, and the left lane was dedicated left turn only, this could easily alleviate some of that congestion.

[Debbie Radiotes](#)

Speeding on Peralta between Linda Mar Blvd and Rosita is a big problem. Trying to make a right/ left turn from Montezuma is an accident waiting to happen. Especially with cars/trucks parked so close to the corner your view is obstructed until you are halfway into the street. Since Peralta is such a narrow street between Linda Mar & Montezuma it makes it even harder. In addition, Montezuma become a speedway for cars trying to beat the lights on Linda Mar Blvd. With the speed, on Peralta, yielding to walkers in crosswalks is becoming a daily problem. I have witnessed walkers almost getting hit twice this month.

[Kristen Beck Petrone](#)

Speed on Clarendon coming from the beach. Lots of tourist (and locals) drive way too fast. Maybe stop sign at 7-11?

Joyce Cabrera

Speeding on Palmetto and cars not stopping for pedestrians. I have seen elderly and people with disabilities struggling to cross the street because some cars do not slow down on intersections.

[Joyce Cabrera](#) agreed! Maybe more signage for crosswalks. I heard there used to be stop signs at these intersections.

[Teeda Tangprasertchai Stiles](#) or maybe those push button crossing lights?

[Cody Bratt](#)

Lack of 4 way stop at Crespi and Fassler!

[Anthony Fisicaro](#)

Widen the highway. It'll help.

[Morgan Venable](#)

Manor/Oceana/Palmetto double intersection is a total mess. Can a traffic engineer propose any changes to that cluster7@#\$? I'd love to have a big roundabout built out over the freeway there, but something tells me that's not gonna happen any time soon

No stop sign at Crespi/Fassler makes that a pretty dangerous left turn Crespi -> Fassler. Speed humps on the adjacent blocks of Fassler might help if a stop sign isn't possible, given the wildly different levels of arterial traffic.

[Laura Sloan](#)

The light on Linda mar blvd changes whenever a car is on peralta is approaching either direction, and the peralta car gets immediate priority even if it's turning right. I always get stuck on Linda mar at this light when there's no other cars, for no visible reason at times.

2

[Debra Preston](#)

The island on LMB needs to be solid from Hwy 1 to the light at the entrance to shopping center. Too many people ignore the "Right turn only" signs exiting the far west driveway. Not to ignore the fact that vehicles leaving the gas station have no such sign, even though you literally have to drive into on coming traffic to make the left onto LMB eastbound.

3

[Apple Appleby](#)

More stop signs on Manor drive. 14 intersections! 5 stop signs? NO COMMERCIAL TRUCKS, RV auto carriers and especially FULL double gas tankers!!

**WE NÉED MORE STOP SIGNS!!**

[JJ Coffey](#)

The light on Linda mar blvd at the shopping center heading toward the beach.. on a weekend you can sit at that light for 3 cycles because the light at hwy1 is so quick that the cars leaving the shopping spill into the intersection

3

[Barbara Keating](#)

From 7:30 AM to 9:30 AM no entering the highway at the Sea Bowl entrance. Having five cars at a time cutting in to the backup is frustrating and causes further delay for everyone heading north from Linda Mar, etc

3

[Apple Appleby](#)

Barbara Keating they should make that a exit off one southbound only. That way they have to go to the light and it would keep drunk drivers from going north on southbound lanes.

[Barbara Keating](#)



*it's a southbound exit already but too many cars use it during commute time to shorten their commute and adds time to everyone coming from Linda Mar*

[Apple Appleby](#)

Highway one exit at the shell station palmetto needs green lights coming off freeway or a stop sign. I hate coming off the exit even if your doing 25 and the driver in front of you stomps their breaks fir the invisible stop sign.

There should be solid red lights at the stop signs for cross traffic there as well they think it is a 4 way stop.

[Shannon Fox](#)

*Manor/Oceana/palmetto intersection is a nightmare. Especially, when school is beginning or getting out. But it's just a nightmare during commuting hours.*

3

[Rick Grepo](#)

Being a lifelong resident of Pacifica I have seen all the issues with today's traffic. There is no easy fix. We are over developed for our current roadways. Now that Pacifica is discovered, we have more people wanting to move here and there has been an increase of tourists trying to get to the beaches our roads and access points needs to be re-engineered.

Manor/Oceana/Palmetto: with the schools and busineses near the intersection traffic has increased. The span across HWY 1 is to short to do anything about the added traffic. I just know when to just come down Hickey fro 35. Hickey/Skyline/Gateway: Typically not a big issue, just only during commuting home. Maybe add a traffic light that controls traffic during the busy times and flashing red the rest of the time. Speeding Manor/Fassler/HWY1: Manor and HW1 not much you can do. Fassller, add speed bumps to slow people down and stop the development project there. Parking Mori Point: Permit residents to park and hourly parking say 2 hours for non permitted cars. Widening the highway still dose not solve the bottleneck in Linda Mar area. It is sad that on a nice day I can see traffic backed up all the way to the Manor Area. I won't even attempt to get on 1 on nice days anymore.

[Monica Denise](#)

The fear that if there is ever an emergency that requires evacuation, we will be doomed because even a slight power outage creates stop and go traffic to get out of town

[Mary Ann Edson-Plumb](#)

The so-called "Smart Lights" on Highway 1 have been a disaster. There are excessive wait times to turn north or head west from Fassler at 1. The wait times for pedestrians to cross 1 at Crespi are also excessive.

[Christy Acuna](#)

A few thoughts: First, a general lack of safe bike lanes or bicycle infrastructure that, 1- could help alleviate traffic congestion if more people feel safer biking for short trips around or across town, and make getting to desirable areas, i.e., grocery stores, school, park, library, post office, etc via bicycle (instead of short car trips that congest traffic even more) more accessible to more people, especially those who are worried about riding with their kids near cars. Second, focusing on traffic calming measures that help make streets safer and move traffic more efficiently for both drivers, pedestrians, and bicyclists, including redesigning/retrofitting streets to induce slower speeds (Speed limits don't work).

[Debi Hirshlag](#)

If you are leaving Rockaway from UPS, it's so difficult to go left to get back in highway 1. Each time I can't believe the design. You have a line of cars coming up from the water, going straight. You have cars coming from in front of the new hotel turning right into that line. And, when the light is green, so people can actually move, you have cars entering Rockaway from across Fassler. So, if you're exiting from UPS it can be impossible to leave. Very frustrating

Norfolk Drive is a nightmare between potholes and parking on both sides. Only room for one car at a time

Better signs explaining the roadway on the south side of the tunnel would be great. My first time through there was very confusing and there are accidents all of the time because of the confusion. Last I saw they had temporary signs saying wrong way and stuff but it's still proven to be a hazard the way it is.

No parking at beaches! We have MANY people coming to use the beaches and even with the yearly parking pass, there's no place to park. You can't go to Pedro Point to the restaurants or stores there because there is no parking. This needs to be addressed. It's not right that the people who live here are held hostage on the weekends particularly.

CROSSWALK - I would love to be able to cross HWY 1 on the north side of the street at Linda Mar, instead of having to cross 3 times to get to the beach.

Attaching photos of the intersection and a recent horrible accident there.



[Mindy Ann-Rotella Camacho](#)

From Crespi turning left onto HWY 1. With the crosswalk and pedestrians crossing only one or two cars can make the turn.

It's impossible to do it with your car crossing the cross walk while pedestrians are still in it

[Mindy Ann-Rotella Camacho](#)

And merging into sharp-park rd from Lundy way. It's supposed to be a merge to go east but people stop. The stop is only for the left turn. We need a physical barrier to prevent cars driving east on sharp park to move over to the right lane after crossing Lundy. And better signage so that cars heading east know there is merging traffic. Or just change it to be a stop for both lanes.

[Mark Simpkins](#)

How about three traffic cops one in Valimar one in Rockaway and one in Lindamar during rush hour and weekend traffic?

[Tom Hart](#)

1. At the intersection of linda mar and oddstad they put ADA cross walk slopes on the curb but no actually cross walk, drivers turning right onto linda mar, or left onto oddstad have no stop sign, and those corners are often obscured by parked vehicles, Many people don't even look and just saunter into that intersection, and many drivers are used to taking those turns without people there.

2. Heading north on highway 1, the right hand turn lane going onto linda mar Blvd could be a lot longer, most traffic build up there is from people heading north, but some of that could be lessened if people turning right could sneak by earlier instead of sitting in that mess.

[Joshua Hoffman](#)

Stop sign on Linda Mar and Capistrano

Stop light at the intersection on hwy 1 south of sharp park

[Linda Thompson Corley](#)

[Joshua Hoffman I agree! I try and stay off of Capistrano! It's a nightmare turning onto the Blvd.](#)

[Rick Tweed](#)

Since building one overpass to replace one of the traffic lights is never going to happen, building four is a true non-starter, and that's the only way to end these delays. I don't see an end to this problem ever...

[Lin Hughes](#)

*The pacifica school district needs to revoke the lottery system in placing childrens in schools that are not in their neighborhoods. Traffic in the mornings heading out of lindamar and rockaway beach is at a stand still as parents have to shuttle children from thier lindamar neighborhoods to schools in the north end. Or the schools need to provide busses. How can they expect low income and one car families to get on the highway and freeway each school day when there is an elementary school within walking distance from their homes? Parents unite!*

Dawn Keating

Good luck, all these were issues when I grew up there many decades ago. Make it a toll road for out of towners and you can raise enough money to maintain and upgrade roads.

Ashley Morris

Dawn Keating see this is what makes me upset, we literally voted on this a few years ago and I think it passed, to improve roadways. All I've seen is them replace Linda Mar Blvd which was already fine.

[Jennifer Waller](#)

There should be a three way stop at Oddstad and Everglades. There should also be more crosswalks on Oddstad in the BoV.



*There is no stop sign nor yield at a 4 way intersection of Fremont Ave where it zig zags across Nelson Ave on way to Monterrey. It's not a busy intersection but still seems there should be something? Even a yield?*

Andrea Fuentes I've driven by this plenty of times. It's alarming.

Going north on Hwy 1, the first light going left AFTER Fassler goes a cycle and a half.

*Stop signs at the bottom of hills in general, so people actually stop and look before turning*

*Sidewalk on right side of crespi going towards the beach....for a stretch you have to switch sides while walking*

*I turn off my car engine if I get a red light and a pedestrian walking.*

Exiting the coast side in an emergency, like a fast moving wildfire.

*And pretty please more signage and or one-way painting on streets throughout west Sharp Park as many (out of town) drivers go the wrong way down these streets and Beach!*

*Ppl rip around the corner, Turning from HWY 35 to Glencourt and quick right to Kavanaugh Way*

The light at vallemar onto highway 1 is ridiculous long. The traffic around manor and palmetto at that 4 way stop by walgreens is getting out of control. Highway traffic all the time. Parking is horrible in Pedro point.

3

*More crosswalks (ones that light up when someone is crossing) around all the schools*

4

[Amanda Gavin](#)

*Yes! I walk my kids to school and we have almost been hit numerous times crossing the road by distracted drivers at Terra Nova/Alicante intersection.*

[Christina Stewart](#)

[Amanda Gavin](#) this is exactly the intersection I was thinking about! My littles go to Ortega and on the first day of school I saw a woman almost get hit by a car in the middle of that crosswalk! After that I decided to only park on the school side of the street for pick up and drop off, I didn't want to have to risk our lives just to cross the street!

JJ Coffey

Christina Stewart honestly, any crosswalk on a busy street.. it's becoming increasingly more dangerous with all the distracted drivers out there. I didn't even think of the flashing crosswalks with this post. Good one

[Brittany Johnson](#)

My biggest issue is we need a second road out of town.

If there is every an emergency situation, like a wildfire, or mudslides on opposite ends of highway 1 (which happened a few years ago, I think?), it's going to cause loss of life.

There is no conceivable way that the majority of the 40,000+ people that live in our town (+ any visitors) would be able to safely evacuate in case of a fast moving wildfire. I believe some people in Paradise had only minutes, and the lone way out (Highway 1) would be bumper to bumper in both directions. This would result in a massive loss of life. Like, people complain about traffic now, but I can't even fathom how many would burn alive in their cars if we get unlucky with a high wind wildfire.

The mudslide example, even if it blocks just one exit of town, is a risk for anyone unlucky enough to have a time sensitive emergency at that time. Rerouting could cost precious time needed to save a life. I can't imagine needing to get to a hospital in say, Daly City, but needing to go through HMB with already slow traffic because everyone needs to leave town this way.

[Dahlia Grabowski](#)

[Brittany Johnson](#) I agree completely! Even just for day-to-day driving, having only one way in and out of town is rough. Anytime anything happens to any part of HWY1 traffic is insane and there is no way around it.

[John Baumgartner](#)

[Brittany Johnson](#) The NIMBYs would never allow another road to be built.

[Carol Dickow Kirkpatrick](#)

*A few stop signs on Fassler and Terra Nova to slow the traffic down. To many speeders.*

[Chris Romero](#)

Dear Engineer. Please complete the 380 extension into Pacifica.

6

[John Palmer](#)

[Chris Romero](#) Never, Thank goodness my group stopped it in the late 1970's and that the GGNRA now owns the open space property so that is DOA. If you want to blame someone for the traffic mess, blame all of the previous city councils and the county board of supervisors for allowing more housing, cramping our highways.

[Nancy Quilici Munroe](#)

*I live in Vallemar and when school is in session it can take 20 minutes to get out of the valley*

[John Palmer](#)

To our city engineer, over highway 1, elevated pedestrian walkways at Fairway, Vallemar, Rockaway, Crespi and Linda Mar, would do a lot to curb the controlled intersections at those areas. There is so much Federal Highway Funds available now, we should start submitting plans, to fund those projects.

3

[Erin Macias](#)

Dropping one lane on Fassler during construction backed up traffic on 1 all the way to Reina Del Mar on a school day. It also backed up to Lerida on Crespi at the same time.

2

[Christine Lebeau Boles](#)

*You guys are amazing! I will pass all this onto Vicki Sundstrom. We're still trying to work on the General Plan Circulation Element. The staff and Planning Commission basically threw up their hands and said there is nothing we can do to mitigate our traffic issues, but there are things we can do. Understanding the major problems is the first step.*

*And we must do this before they start to look at where we can put 1900 new units of housing that the state is forcing upon us. Can you imagine all that extra traffic?*

[Debra Cecchini Adlawan](#)

The light on Crespi and Hwy 1. Ridiculous to turn left on to Crespi. You sit forever waiting for light to change because the Northbound traffic just keeps on coming.

3

[Deborah Sherwin](#)

1. Ditto for the whole manor/oceana/palmetto situation

2. Hickey/skyline lacks clear signage for Skyline itself and the left-only lane

- parking up on corners blocks visibility. All around Westview. And on Francisco (ie. Turning out from Hilton/the library)

- 2 way stops that could use 'cross traffic does not stop signs': Fremont cutting across Manor area, side streets cutting across Palmetto near the pier

[Terri Echelbarger](#)

Way to much wrong way driving tourists on beach Blvd. - better signage please

[Dahlia Grabowski](#)

The two 4-way intersections in Manor near Mazetti's are hellish.

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[Dahlia Grabowski](#)

*The two 4-way intersections in Manor near Mazetti's are hellish.*

[John Baumgartner](#)

Killing the Calera Parkway Project is the worst thing the NIMBY crowd ever did to this town. Caltrans wanted to spend millions of its dollars to give our town a free upgrade and fix the nightmare bottlenecks at Vellemar and Rockaway Beach.

But the no-growth crowd killed the project, and only supported alternatives which Caltrans knew would not have worked. And we didn't even get those alternatives!

[Francesca T Priest](#)

*#5 pedestrians almost get hit crossing that crosswalk daily. People turning right on red only look left and forget to look right before turning. Maybe making it no turn on red? Or a*

*Larger flashing light or the ground could light up??? It needs a solution. Thank you*

2

[Jen Hansen](#)

[Francesca T Priest on Fassler and on Crespi At highway 1!! Yes!!!](#)

[Francesca T Priest](#)

[Jen Hansen yes. I've had to get the eye contact of drives turning right off Fassler on to Highway 1. Some people look scared that they have almost hit someone and almost HALF of the people NEVER NOTICE we are there and just go! Literally if pedestrians don't walk protectively and wait on cars to see them they will get hit.](#)

[Laura Tinari](#)

Sharp park exit could really use some signage to let cars know there is no stopping. Many times people go around cars that stop creating a pretty dangerous situation. Also the on ramp going north coming from Sharp Park Rd should yield to drivers turning left onto the freeway from the other direction.

4

[Mindy Ann-Rotella Camacho](#)

[Laura Tinari yes! I actually reported this to cal trains. Because it isn't Pacificas domain.](#)

[Peg M Grady](#)

We live on Paloma between Winters/Francisco and Palmetto. Paloma becomes a major thoroughfare for many coming off of Hwy 1. Either we are gridlocked especially weekends, making backing out of a driveway, challenging or we are challenged by speeding cars and backing out becomes scary. I'm addition, the excess speed has led to one too many near misses of pets who wander from yards and children who are on bikes and scooters and students returning home or going to school. We have put up yellow signs reminding people of children and pets. I'm ready to put out portable speed bumps. Our neighbors who have lived here longterm say the city has been notified numerous times. Also they have been notified re: our street being parked in by beach visitors. I suggest the street be evaluated (all of Paloma right to the ocean), better signage re: speed and the fact that Paloma is one way on this side of it and that, if necessary some speed deterrent be installed (newer forms not big speed bumps). Re: parking. Why does our city not have more beach parking for a nominal charge similar to the lot by the senior center where many of our city offices reside? Wouldn't that provide an additional revenue source that could be designated for some of what's listed here in the over 159 comments? And, we need to welcome our beach visitors yet having streets so parked in so that getting into & out of driveways is challenging and our personal guests can't even park near our houses becomes disillusioning. Thanks, [Christine](#), for creating this opportunity and thank you to the traffic engineer for volunteering to help us.

[Anna Yen](#)

Sheila Ln going uphill at the curve in the road is REALLY dangerous, especially at night. Street parking should be prohibited at/near that curve. At the least, install mirrors on both sides of road so drivers can see oncoming traffic. Due to parked cars



there, there is often barely (if even) enough room for 2 cars to pass each other by. And some drivers zoom up or down that street around the blind turn.

[Christine Lebeau Boles](#)

[Thank you all again for all this helpful information! Would anyone be willing to volunteer for a couple of hours to help organize all this info so Vicki Sundstrom and I have all the information for each specific area together?](#)

[4 h](#)

[Francesca T Priest](#)

[Christine Lebeau Boles Would you like signatures from Rockaway beach neighborhood and accounts of multiple almost hits? Many of my neighbors have the same experience as my family. Email form?](#)

[Jennifer Pagnini](#)

[The timing of the lights on Reina Del Mar and Hwy 1 is poor. The four way stops by Mazettis and Walgreens needs to be patrolled better. The crosswalk on Hwy 1 and Crespi is dangerous since people don't care to give pedestrians space to cross.](#)



Pacifica Locals

Maiza Jaco · Yesterday at 07:08 · 🌐

Good morning pacifica just wanted to update a lot of you on my son Josiah's progress it has been almost 2 years in December since his accident and Josiah is doing great I wish I would have keep the gofundme open just to post all his progress but I know a lot of you are on here because the pacifica community really stepped up and support me and my family when Josiah was in the hospital thank you all again very much ( Josiah with his sister on her graduation day ) he is now attending school again and is looking to try to get a part time job he tells me he wants to make money so that one day we can buy a house ) thank you all again





image.png  
255K

March 4, 2022

Christian Murdock  
Deputy Planning Director  
City of Pacifica,

Regarding - Pacific DEIR – SCH 2020089010/2012022046

Dear Mr. Murdock:

Enclosed please find my comments, notes and feedback on the Pacifica's DEIR with respect to the General Plan Update.

1. Based on page 1-3 of Plan Pacifica DEIR, the existing condition and key issues report was published in July 2010. It is not clear in reviewing the DEIR if or when the existing conditions, specifically traffic and parking data and related analysis were updated to 2019 (pre-pandemic) conditions. Please clarify which portions of the report have accounted for the traffic & parking growth through 2019 and if mitigation measures are based on 2019 conditions.

**Analysis of Existing Conditions**

The plan-making process involved City staff working closely with land use, traffic, market demand, and other consultants to analyze existing conditions and development opportunities. Interim reports were prepared to document findings of technical analysis. These findings were integrated in the *Existing Conditions and Key Issues* report, published in July 2010 and presented to a joint City Council/Planning Commission workshop in September 2010. In response to questions from Council and Commission members, the report on traffic conditions and the transportation chapter of the Existing Conditions report were revised and released in May 2011. An Existing Conditions report for the Sharp Park area was published in November 2019 and updated in December 2019 incorporating suggestions from the Planning Commission.

2. E-13: Design guidelines are referenced. The design guidelines found on the Pacifica website dated 1990 are obsolete and have not served Pacifica well. Additionally, the guidelines do not reference standards or codes. They could, in lacking specificity, contribute to engineering and environmental compliance issues.
3. There is an error in the DEIR with respect to growth in the housing units. At the San Mateo County Housing seminar (April 2021), both you and Josh presented housing growth requirement of 1892 units. Whereas the DEIR indicates 990. Please clarify which is correct. Also please explain where this growth is planned for if this document is to take us into 2040.

**Table ES-1: Population, Housing Units, and Jobs at Buildout<sup>1</sup>**

	Existing (2020)	Additional	Buildout	Growth (percent)
Population	38,330	2,720	41,050	7.1
Housing Units	14,520	990	15,510	6.8
Jobs	5,840	1,470	7,310	25.2%

<sup>1</sup> Numbers rounded to the nearest tenth are only approximate projections.

Source: C/CAG 2040 TDM, Department of Finance, 2020; Dyett & Bhatia, 2020.

## RHNA5 vs. RHNA6

Income Level	RHNA 5 Allocation	RHNA 6 Allocation*
Very Low Income (50% AMI)	121	538
Low Income (60% AMI)	68	310
Moderate Income (80% AMI)	70	291
Above Moderate Income (120% AMI)	154	753
<b>TOTAL:</b>	413 units	1,892 units

\*Regional Housing Needs Allocation Draft Methodology, February 2021

With respect to the circulation element -

- See appendix A, a table prepared based on Caltrans traffic census. While the population in Pacifica has grown by 3%, traffic has grown from 13% to 57%. The DEIR clearly indicates existing conditions based on 2010. Given the substantial growth in traffic volumes, any traffic analysis, conclusions and mitigation measures are not usable.
- Traffic intersections included in the DEIR address the intersections along highway 1 but there is no analysis for any local streets in Pacifica. Local intersections are experiencing increasing congestion, some meriting traffic (signals and signs) warrant analysis. The traffic roadway system, as a whole, is failing to deliver adequate level of service – with or without the project.
- Given that community engagement meeting for the General Plan took place in 2009, the community in current day Pacifica was not engaged in the circulation element to discuss the priority of addressing the traffic and related safety concerns in Pacifica. Please explain how this will be rectified.
- The deterioration of many Pacifica local street has effectively lowered the capacity and level of service. This too is not accounted for in any analysis based on 2010 “existing conditions”. Please explain how this will be accounted for.
- See Appendix D, please explain why existing condition level of services have changed with 4/21 & 2/22. Also please explain why locations have changed.

9. Implementation of complete streets and mode shift to bicycles require additional study before being included in these documents. Implementation of 'complete streets' to support mode shift to bicycle usage is not a viable congestion management solution for Pacifica. Given:

- Pacifica terrain and lack of local roadway network connectivity between communities will not allow for enough of a mode shift to allow any significant improvements to traffic congestion.
- Unless Pacifica wishes to implement an e-bike program, bike mode shift is only successful on flat terrains for rides within 7 miles or 20 minutes.
- Implementation of complete streets (separate bike facilities specifically), while admirable, will contribute to substantial roadway capacity issues on many Pacifica streets. And it will result in inadequate emergency access on some streets.
- Between on-street parking, bike lanes and existing traffic, traffic congestion will increase and further impact evacuation/emergency response routes.
- On-street parking and dedicated bike facilities are not compatible – cities that have implemented bike facilities safely and successfully have done so by eliminating street parking or providing substantial buffers to separate the two.

	to adjacent undeveloped areas.	
CI-I-2	<p><b>Complete Streets Design Approach.</b> Update the City's engineering design standards to implement Complete Streets concepts, and include Complete Streets design principles in the planning of all circulation improvement projects. These principles include, but are not limited to:</p> <ul style="list-style-type: none"> <li>• Maximizing connections with the existing circulation network;</li> <li>• Minimizing ingress and egress points and consolidating entries;</li> <li>• Providing public transit facilities and improvements;</li> <li>• Providing bicycle and pedestrian facilities (bike lanes and sidewalks);</li> <li>• Minimizing pedestrian crossing distances by providing curb extensions; medians with safety refuges, and other treatments;</li> <li>• Improving safety by providing lighting and traffic calming devices for residential streets;</li> <li>• Including landscaping (trees, medians, key intersections and gateways);</li> <li>• Providing appropriate signage, including street signs, entry signs, and directional signs;</li> <li>• Providing street furniture; and</li> <li>• Maintaining on-street parking.</li> </ul>	
CI-I-5		

3.2-4 Implementation of the Proposed Project would not result in inadequate emergency access.

Policies 4-G-1 through 4-G-4 and 4-I-

*Circulation Element*

Policies CI-I-2, CI-I-3, CI-I-4, CI-I-7, C Policies CI-G-3, CI-G-14, CI-I-23, CI-I following:

CI-I-1

**Connective Street Ne**  
development to continue  
to adjacent undeveloped

10. With respect to the complete streets design approach, LOS must be maintained or improved while implementing complete streets. Guidelines and standards as implemented by the [State of California](#) or [better](#) are to be utilized in the implementation of the program.



11. Between visitors and increased car ownership, Pacifica on-street parking utilization has increased. Visitor parking in private lots (Taco Bell, Grocery Outlet etc) has also increased. The data provided does not account for the overflow of parked vehicles into residential areas or vice versa. Conduct a parking utilization studies to review on-street & off-street (private and public) parking capacity and utilization. Account for future growth into 2040. Plan for displaced parking and parking growth in each Pacifica neighborhood.

**Table 3.2-1: Commuter and Beach Visitor Parking**

Type and Location	Capacity (approx.)
<b>Park-and-Ride Lots</b>	
Linda Mar	70
Subtotal	70
<b>Beach Visitor Lots</b>	
Crespi Drive	110
Pacifica State Beach (south)	54
Pacifica State Beach (north)	135
Rockaway Beach (south)	50
Rockaway Beach (north)	54
Sharp Park Beach Promenade/Pier	53
Subtotal	456

Source: Dyett & Bhatia, 2021.

A parking lot usage study of the lots at Pacifica State Beach conducted in June 2010 by the City of Pacifica Public Works Department found average daily use was approximately 5,360 vehicles. If year-round usage were at this level, this translates to nearly two million vehicles per year.<sup>5</sup>

12. With respect to Congestion Management Program & Transportation Demand Management–

- Pacifica lacks a [Congestion Management Plan](#), as required by the State and the County. Pacifica has not observed required traffic analysis in the permitting process to understand congestion attributed to any development or change. Nor does Pacifica conduct traffic counts or analysis to understand traffic changes. All of which add to not having any measures in place for such a program – which ultimately is why Pacifica continues to see unmitigated traffic growth/congestion.
- Transportation Demand Management goals and objectives are based on roadway system capacity, existing demand, and project related growth. The municipality must establish the goals (percentage trip reduction in general and during peak periods, parking ratios), it is up to the project or business to develop programs that meet the required goals. Traffic impact fees are assessed on any trips over the established goal. The programs do not work without clearly defined goals (trip reduction), overage fees and monitoring.
- Given the roadway capacity constraints and limited financial resources available to Pacifica to address said constraints, all projects (non residential, residential, schools, churches etc) should be subject to some transportation demand management measures, parking ratios and traffic impact fees.
- Monitoring is required by the State. Implement traffic count and speed monitoring programs via intelligent transportation technology.

CI-I-51

**Transportation Demand Management Measures.** Incorporate conditions of approval for development projects that exceed the Congestion Management Program (CMP) threshold for impacts to the CMP transportation network to require adoption of transportation demand management (TDM) measures authorized by the CMP to make measurable reductions in their trip generation and to require a monitoring plan to determine if established trip reduction targets are met or exceeded. Require TDM measures for development projects below the CMP threshold whenever feasible, but do not require a monitoring plan for these smaller projects.

Small projects and large projects will be subject to different goals and monitoring and reporting requirements.

- Free parking is the biggest deterrent to Transportation Demand Management Programs and parking charges should be considered as an option both for Congestion Management and Economic Development.
- Stated TDMs options read like a textbook of available strategies rather than targeted policy to meet objectives. Please provide targeted strategies appropriate to our community and identify programs based on type of property (residential, commercial, etc)

13. Circulation element – How does the city plan to reduce congestion on roadways before reducing roadway capacity to implement complete streets?

14. Before subjecting Commuter Trip Reduction programs expenses onto employers in Pacifica, please quantify how many people commute long/er distances to Pacifica and would use said programs. Also quantify how many of these jobs can be done remotely. These programs appear to add cost to doing business in Pacifica without any real impact to congestion.

**Table ES-3: Summary of Impacts and Proposed General Plan and Sharp Park Specific Plan Policies that Reduce the Impact**

Impact	Proposed General Policies and Mitigation Measures that Reduce the Impact	Significance after Mitigation
	<p>MM-TRA-1: Require applicants for non-residential projects that employ 20 or more people—which is equivalent to 12,000 square feet of retail space, 6,000 square feet of office space, 20,000 square feet of industrial space, or 22 hotel rooms to implement an employee commute trip reduction (CTR) program. The CTR program shall identify alternative modes of transportation to the project, including transit schedules, bike and pedestrian routes, and carpool/vanpool availability. Information regarding these programs shall be readily available to employees and clients. The project applicant or designee shall implement at least one of the following incentives for commuters as part of the CTR program, or another equally effective incentive:</p> <ul style="list-style-type: none"> <li>• Ride-matching assistance</li> <li>• Subsidized public transit passes</li> <li>• Vanpool assistance or employer-provided vanpool/shuttle</li> <li>• Car-sharing program (e.g. Zipcar)</li> <li>• Bicycle end-trip facilities, including bike parking, lockers, and showers.</li> </ul> <p>MM-TRA-2: Encourage businesses to implement telecommuting, hybrid, and alternative work schedules that allow employees to utilize remote work options while reducing vehicle-based commutes.</p>	
3.2-3 Implementation of the	Circulation Element	Less than

15. Given that the Sharp Park Specific Plan related community meetings were limited to Sharp Park, the items stated below should be addressed with the greater Pacifica as it relates to all of Pacifica.

**Table ES-3: Summary of Impacts and Proposed General Plan and Sharp Park Specific Plan Policies that Reduce the Impact**

Impact	Proposed General Policies and Mitigation Measures that Reduce the Impact	Significance after Mitigation
	<p>CI-I-29 <b>Additional Pedestrian Facilities on Large Sites.</b> Enhance the pedestrian network with an interconnected system of walkways, continuous sidewalks on both sides of the street, and pedestrian crossings as part of higher-intensity redevelopment of large sites.</p> <p>Open Space and Community Facilities Element</p> <p>OC-I-37 <b>Public Shoreline Access.</b> Continue to ensure that new development does not interfere with the public's right of access to the sea at locations identified in the Local Coastal Land Use Plan and where public access to the sea has been acquired through historic use or legislative authorization.</p> <p>OC-I-38 <b>New Development and Coastal Access.</b> Require that new development along the coastline provide public access from the nearest public roadway to the shoreline and along the coast. Allow the Planning Director to grant exceptions to this requirement where public access would pose a safety risk or threat to fragile resources, or where adequate access exists nearby.</p> <p>OC-I-40 <b>Maintenance of Public Coastal Access through Private Development.</b> Require a public or private entity to be responsible for required public access ways. Until such an entity agrees to be responsible for such access ways, they are not required to be open for public use. Dedicated public access ways should be designed to provide views as well as access connections to or along the shore.</p> <p><b>Sharp Park Specific Plan Policies</b></p> <p>3-G-2, 3-G-3, 3-I-1, 3-G-4, 4-G-1, 4-G-3, 4-I-6, 4-I-7, 5-I-34, 5-I-35</p>	
I-2 Implementation of the	Land Use Element	Less than

16. At the time the GPU/DEIR were issued for review (3/2022), Pacifica is looking at a budget shortfall for a few years to come, has paid fines for sewer spills, and is looking at increasing sewer rates. The City of Pacifica did not have the funds to adequately prepare this report with current data. Pacifica cannot financially accomplish much of what is stated in this report, including addressing any of the hazards we have, with or without the project. Any development in hazardous areas should include policy to hold the City of Pacifica harmless for loss of life should hazards occur. Developer, realtors and homeowners in the new developments should fund safety and maintenance programs.

- *Protection from Natural Hazards.* Pacifica faces a variety of natural hazards, including fires, earthquake-induced landslides, flooding, and coastal erosion. The Plan establishes a land use pattern that reflects hazardous conditions, such as steep slopes and coastal bluffs, and includes policies to improve public safety services and emergency management. The need to respond over the long term to coastal erosion will be an ongoing challenge for the City.

17. Any policy that limits access to the coast by residents should be addressed with the citizens, please explain how the City will work with the residents to address access issues.

<p><i>Safety Element</i></p> <p>SA-I-19 and SA-I-25 as listed under Impact 3.5-1.</p> <p>See Policies SA-I-14, SA-I-17, SA-I-18, SA-I-20, SA-I-22, SA-I-23, SA-I-28, and SA-I-30 listed under Impact 3.5-3.</p> <p>SA-G-2      <b>Development in Hazardous Areas.</b> Protect new development in 100-year floodplains and tsunami hazard zones with flood damage prevention programs.</p> <p>SA-G-3      <b>Sea Level Rise Adaptation.</b> Establish policies to minimize the risk to persons and property posed by potential sea level rise.</p>	<p>Li Si</p>
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#### Fire response/Safety

18. Evacuation routes/Implementation of the Proposed Project would not result in adequate emergency access. With or without project, there is inadequate emergency access in Pacifica unless all the roads are cleared (see 8/21/2022 press release). While clearing the road may have been an option during the pandemic, it will not always be possible. Also clearing the roads for emergency access would prohibit evacuations. The planned update does not address existing (2022) reality, nor does it address 2040 conditions

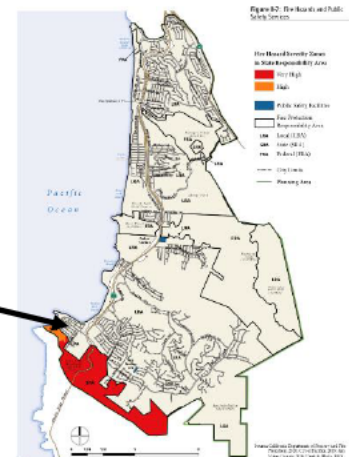
<p>3.2-4 Implementation of the Proposed Project would not result in inadequate emergency access.</p>	<p>Policies 4-G-1 through 4-G-4 and 4-I-1</p> <p><i>Circulation Element</i></p> <p>Policies CI-I-2, CI-I-3, CI-I-4, CI-G-3, CI-G-14, following:</p> <p>CI-I-1      <b>Connective development to adjacent u</b></p>	<div data-bbox="786 1669 1427 1797"> <h2>Aug. 21, 2020 - Public Safety Officials Urge People to Keep Coastal Roads Clear for First Responders, Evacuees</h2> </div> <div data-bbox="786 1814 1399 1841"> <p>Major roads closed, Half Moon Bay shuts beaches before weekend</p> </div> <div data-bbox="786 1856 898 1879"> <p>August 21, 2020</p> </div> <div data-bbox="802 1936 867 2003">  </div> <div data-bbox="872 1936 1125 2009"> <p><b>COUNTY OF SAN MATEO</b> JOINT INFORMATION CENTER EMERGENCY OPERATIONS CENTER</p> </div> <div data-bbox="1123 1923 1494 2041"> <p>HALF MOON BAY, Calif. – Fire and public safety officials ask people to avoid driving to the San Mateo County coast to keep roadways clear for emergency vehicles as well as residents evacuating from a series of wildfires raging through southern</p> </div> <div data-bbox="786 2041 1097 2064"> <p>San Mateo and northern Santa Cruz counties.</p> </div>
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## 19. Fire map discrepancies

There are discrepancies between the fire risk maps in these documents and those published by the state and PGE. They have been provided in Appendix C. Please explain. How will this be rectified?

## 20. Why does the map fire risk map shown in the Pacifica documents only show in color the state owned risk areas?



## 21. Please elaborate on how response time will be improved. This should be accounted for in this GPU and DEIR. Without addressing this concern, there is a significant impact to emergency response from this project and related development.

3.11-7 Implementation of the Proposed Project would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires.	<p><i>Safety Element</i></p> <p>SA-G-8 <b>Fire Prevention.</b> Protect Pacifica residents and businesses from potential wildland fire hazards.</p> <p>SA-I-91 <b>Response Time.</b> Support efforts by North County Fire Authority to meet its response time standards throughout the City.</p> <p>SA-I-92 <b>Adequate Peakload Water Supply.</b> Work with the Water District to maintain adequate water supply for firefighting, including capacity for peakload under a reasonable worst case wildland fire scenario, to be determined by the</p>	Less than Significant
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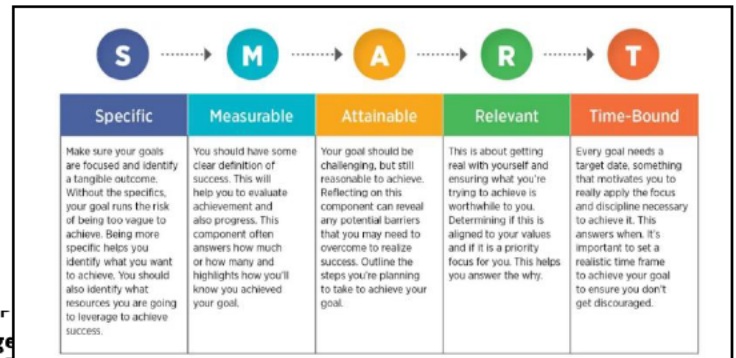
## 22. Conservation Element, Wetlands Preservation – implement citywide policy to train staff to recognize wetlands. Implement policy and fines in support of preservation.

<p><i>Conservation Element</i></p> <p>CO-I-4 <b>Wetlands Preservation.</b> Prohibit new development in existing wetlands except as allowed under the federal Clean Water Act and the California Coastal Act. Continue to require formal delineations wetlands subject to State or federal regulations prior to any proposed development project in an area where potential wetlands have been identified. If impacts on wetlands are unavoidable, compensation measure should be in line with the State's no-net-loss goal regarding wetlands.</p>
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## 23. There is not enough information in the DEIR or GPU to substantiate that the implementation of the proposed project would not interfere with the movement of wildlife. Please explain how the sea wall planned at Sharp Park impacts sea life. Given that the existing conditions are from 2010 and much has changed, please explain how existing conditions will be addressed.

<p>other means.</p> <p>3.7-4 Implementation of the Proposed Project would not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.</p>	<p><i>Land Use Element</i></p> <p>Policies LU-G-7 and LU-I-12, as listed above.</p> <p><i>Conservation Element</i></p> <p>CO-G-10 <b>Other Environmentally Sensitive Areas.</b> Protect other potential Environmentally Sensitive Habitat Areas (ESHAs), High Value or High Habitat Value areas, and Wildlife Movement Corridors from development that would significantly disrupt habitat values.</p> <p>In addition, implementation of proposed General Plan policies CO-I-27, CO-I-33, and CO-I-42, as listed above, will reduce the impact.</p>	Less than Significant
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24. May policies (examples below) are ambiguous and require further definition. Actions such as “support”, “work with”, “continue coordination” have left us with a community that is sitting in traffic and please be specific. What action, to accomplish what and the timeline. I recently spoke to Sam Bautista about the Manor Bridge repairs and he gave me CalTrans schedule but the traffic is bad and continues to get back and there are no interim measures for at least the next 4 years – that kind of “coordination” really doesn’t fix anything. Please also provide clarity on how much funding is required and realistically what can and can be accomplished based on Pacifica’s finances. Use SMART methodology to clearly define objectives.



- CI-I-46 **Service Optimization.** Continue coordination efforts with transit agencies (i.e., SamTrans) to maintain transit service that is safe and efficient, provides convenient connections to high-use activity areas and key destinations outside the City, and responds to the needs of all passengers, including seniors, youth, and persons with disabilities.
- CI-I-47 **Improved Transit Stops.** Work with transit agencies to improve transit stops.
- CI-I-15 **Strategies to Reduce School-Related Peak Hour Auto Congestion.** Work with Pacifica School District and Jefferson Union High School District to promote adoption of staggered hours, car-pooling, and use of transit to reduce traffic congestion during peak hours.

- CI-I-52 **Local Transportation Services.** Support expanded funding for Local Transportation Services tailored to the schedules and destinations of students, seniors, and recreational visitors.

## Examples from San Luis Obispo –

### 1.7.5. Support a Shift in Modes of Transportation.

San Luis Obispo will:

1. Physically monitor the achievement of the modal shift objectives shown on Table 1 and bi-annually review and adjust transportation programs if necessary.

## 2.1. Policies

### 2.1.1. Multi-level Programs

The City shall support county-wide and community-based efforts aimed at substantially reducing the number of vehicle trips and parking demand.

### 2.1.2. Flexible Work Schedules

The City shall support flex time programs and alternative work schedules to reduce peak hour traffic demand.

### 2.1.3. Work-based Trip Reduction

The City shall encourage employers within the city limits and work with the county to work with employers outside of the City limits to participate in trip reduction programs.

### 2.1.4. Downtown Congestion

Within the Downtown the City shall establish and promote programs aimed at reducing congestion in a way that supports the long-term economic viability of the downtown.

### 2.1.5. Long-term Measure

The City shall support programs that reduce traffic congestion and maintain air quality. If air quality degrades below legal standards or level of service (LOS) standards are exceeded, the City will pursue more stringent measures to achieve its transportation goals.

Please let me know you'd like to discuss any of these comments further.

Regards,

Vicki Sundstrom

## Appendix A

Caltrans Annual Average Daily Traffic - Hwy 1.

Year	DESCRIPTION	BACK_AADT	% INCREASE/BACK AADT	AHEAD_AADT	INCREASE/AHEAD AADT
2013	PACIFICA, SAN PEDRO AVENUE	15000	13%	15000	13%
2016	PACIFICA, SAN PEDRO AVENUE	16000		16000	
2019	PACIFICA, SAN PEDRO AVENUE	17000		17000	
2013	PACIFICA, LINDA MAR BOULEVARD	15000	13%	32500	14%
2016	PACIFICA, LINDA MAR BOULEVARD	16000		35000	
2019	PACIFICA, LINDA MAR BOULEVARD	17000		37100	
2013	PACIFICA, ROCKAWAY BEACH AVENUE	36500	13%	47500	14%
2016	PACIFICA, ROCKAWAY BEACH AVENUE	39000		51000	
2019	PACIFICA, ROCKAWAY BEACH AVENUE	41300		54100	
2013	PACIFICA, REINA DEL MAR AVENUE (TO VALLEMAR)	47500	14%	49000	13%
2016	PACIFICA, REINA DEL MAR AVENUE (TO VALLEMAR)	51000		52000	
2019	PACIFICA, REINA DEL MAR AVENUE (TO VALLEMAR)	54100		55200	
2013	PACIFICA, SHARP PARK ROAD	47000	13%	33500	19%
2016	PACIFICA, SHARP PARK ROAD	50000		37000	
2019	PACIFICA, SHARP PARK ROAD	53000		40000	
2013	PACIFICA, CLAREDON ROAD/ OCEANA BLVD	33500	19%	33000	19%
2016	PACIFICA, CLAREDON ROAD/ OCEANA BOULEVARD	37000		34000	
2019	PACIFICA, CLAREDON ROAD/ OCEANA BOULEVARD	40000		38000	
2013	PACIFICA, MILAGRA DRIVE	33000	42%	25500	42%
2016	PACIFICA, MILAGRA DRIVE	40500		32500	
2019	PACIFICA, MILAGRA DRIVE	47000		40000	
2013	PACIFICA, MONTEREY ROAD	25500	57%	40000	38%
2016	PACIFICA, MONTEREY ROAD	32500		45500	
2019	PACIFICA, MONTEREY ROAD	40000		55000	

Pacifica Population		
2013	37835	
2016	38844	
2019	38984	3% increase over 6 years

**Table 3.2-5: Peak-Hour Intersection Operations Summary – Existing and Plan Buildout Conditions**

	Intersection	Control	Peak Hour	Existing		Plan Buildout (2035)	
				Delay <sup>1</sup>	LOS <sup>2</sup>	Delay <sup>1</sup>	LOS <sup>2</sup>
CMP Intersections	1 Hickey Boulevard / SR 35	Signalized	AM	65.0	E	127.9	F
			PM	71.8	E	116.6	F
	2 Reina del Mar Avenue / SR 1 <sup>3</sup>	Signalized	AM	175.0	F	211.7 (140.5) <sup>4</sup>	F (F) <sup>4</sup>
			PM	135.5	F	236.3 (150.6) <sup>4</sup>	F (F) <sup>4</sup>
	3 Fassler Avenue / SR 1 <sup>3</sup>	Signalized	AM	93.8	F	143.3 (72.7) <sup>4</sup>	F (E) <sup>4</sup>
Non-CMP Intersections			PM	94.3	F	155.1 (79.6) <sup>4</sup>	F (E) <sup>4</sup>
	4 Crespi Drive / SR 1	Signalized	AM	25.4	C	38.2	C
			PM	18.3	B	48.7	D
	5 Linda Mar Boulevard / SR 1	Signalized	AM	65.1	E	83.1	F
			PM	107.0	F	96.0	F
	6 Hickey Boulevard / Gateway Drive	AWSC <sup>5</sup>	AM	68.0	F	71.9	F
			PM	82.8	F	87.0	F
	7 Manor Drive / Palmetto Avenue <sup>4</sup>	AWSC <sup>5</sup>	AM	14.9	B	12.7	B
			PM	24.8	C	13.2	B
	8 Manor Drive / Oceana Boulevard <sup>4</sup>	AWSC <sup>5</sup>	AM	26.3	D	13.8	B
			PM	18.6	C	16.5	C
	9 Fassler Avenue / Crespi Drive	Unsignalized	AM	6.4		7.6	
			PM	1.4		7.4	
	NB Approach	Unsignalized	AM	49.1	E	60.2	F
			PM	21.4	C	62.7	F
	WB Left	Unsignalized	AM	8.1	A	8.3	A
			PM	9.4	A	8.2	A
	10 Fassler Avenue / Terra Nova Boulevard		AM	10.1		10.1	
			PM	4.1		13.3	
	NB Approach	Unsignalized	AM	20.5	C	21.7	C
			PM	13.4	B	26.2	D
	WB Left	Unsignalized	AM	8.0	A	8.1	A

3.3.24

## Appendix B

Discrepancies in analysis for the same locations. Also one location has been eliminated.

## In DEIR

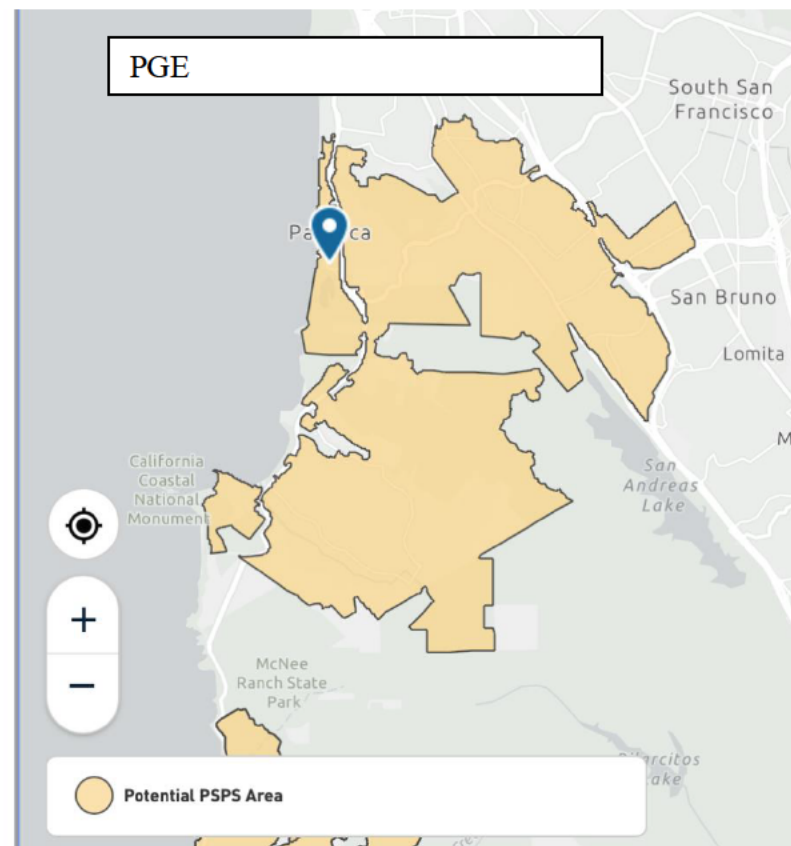
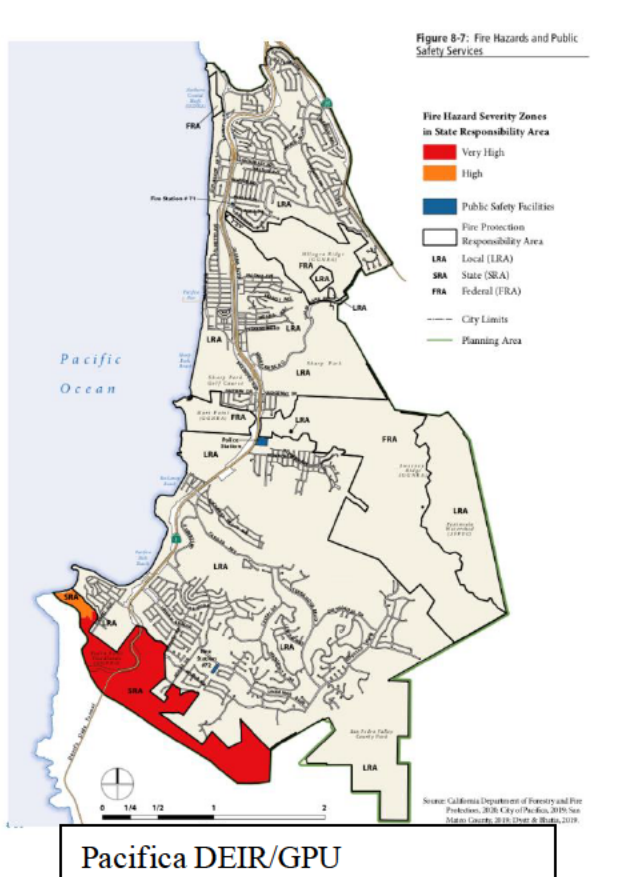
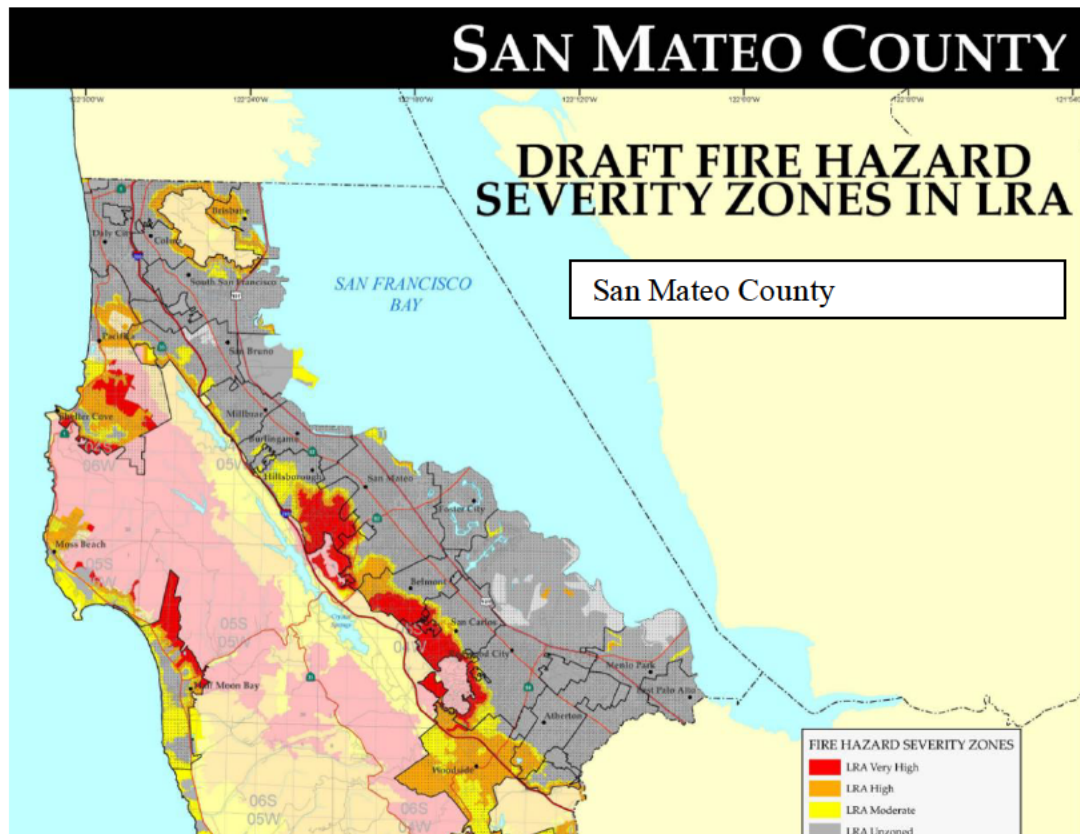
**Table 3.2-4: Peak-Hour Intersection Operations Summary – Existing and Plan Buildout Conditions**

Intersection		Control	Peak Hour	Existing Delay <sup>1</sup>	Existing LOS <sup>2</sup>	Plan Buildout (2040)	
						Delay <sup>1</sup>	LOS <sup>2</sup>
CMP Intersections							
1	Hickey Boulevard / SR 35	Signalized	AM PM	41.7 39.1	D D	50.8 50.8	D D
10	Reina del Mar Avenue / SR 1 <sup>3</sup>	Signalized	AM PM	61.0 35.5	E D	69.6 58.2	E E
11	Fassler Avenue / SR 1 <sup>3</sup>	Signalized	AM PM	35.5 47.8	D D	38.8 37.0	D D
12	Crespi Drive / SR 1	Signalized	AM PM	12.2 7.1	B A	14.7 9.7	B A
13	Linda Mar Boulevard / SR 1	Signalized	AM PM	17.3 27.2	B C	28.0 43.6	C D
Non-CMP Intersections							
2	Manor Drive / Oceana Boulevard <sup>4</sup>	AWSC <sup>5</sup> Signalized Build	AM PM	18.0 23.2	C C	63.1 44.3	E D
3	Manor Drive / Palmetto Avenue <sup>1</sup>	AWSC Signalized Build	AM PM	32.1 23.0	D D	96.9 71.7	F E
4	Paloma Avenue/ Oceana Boulevard	AWSC Signalized Build	AM PM	66.6 15.4	F C	48.4 23.5	D C
5	Paloma Avenue/ Francisco Boulevard	AWSC	AM PM	11.2 9.8	B A	17.5 13.2	C B
6	Paloma Avenue/ Palmetto Avenue	AWSC	AM PM	12.4 12.3	B B	20.8 28.7	C D
7	Clarendon Road/Oceana Boulevard	AWSC	AM PM	12.4 12.3	B B	17.1 15.1	C C
8	Clarendon Road/ Francisco Boulevard	AWSC	AM PM	9.8 10.2	A B	11.9 11.6	B B

## Appendix C



Appendix C –  
Map discrepancies in risk areas.



San Luis Obispo – TDM policy and monitoring program  
Belmont – Residential TDM

**Table 1**  
**TDM Points Required by Project Type & Size**

Land Use	Size	Points required
<b>Residential</b>	6–12 units	4 points
	12–50 units	8 points
	>50 units	12 points
<b>Commercial, Institutional, Industrial</b>	<10,000 sq ft	6 points
	10,000–25,000 sq ft	10 points
	25,000–50,000 sq ft	14 points
	>50,000 sq ft	18 points

April 4, 2022

Christian Murdock  
Deputy Planning Director  
City of Pacifica,

Regarding – Pacifica Quarry DEIR – SCH 2020090036

Dear Mr. Murdock:

In response to the Quarry Reclamation Project:

1. The quarry is centrally located, along hwy 1, in Pacifica – any daily trucking operation to the facility will impact the everyday life of commuters in Pacifica, students/parents, and commuters living south of the tunnel. The analysis provided does not adequately address the impact of the trucking operation to the users of hwy 1 – an operation to take place 5 days a week for 4 years.
2. The traffic analysis provided make a number of assumptions with respect to the trucking operation (size of vehicle, frequency of deliveries) – making the traffic analysis deficient in accurately reviewing and addressing the impact of the operation to the community at large.
3. Traffic counts and LOS from the Pacifica Draft DEIR are provided in appendices A & B.
4. Has Caltrans and San Mateo County, and the communities south of the tunnel been provided with information on this project and included in the review process?
5. Turning radii by vehicle type are provided in appendix C. Given the planned access point into the quarry (existing trail, 90 degrees off hwy 1), with no deceleration lane and no planned widening to build an adequate “driveway” any vehicle over the size of passenger vehicle would be **slowing down considerably to make a right turn from the number 1 or 2 lanes from Hwy 1**. In order to make said turn from the number 1 lane, should that be required based on the size of the vehicle, a flagger operation would be required on Hwy 1. With vehicles expecting to arrive every 2 minutes or so, how exactly is SB through traffic supposed to operate between 7am-5pm, M-F?
6. Intersections in the area of the Quarry are in the San Mateo County CMP (appendix B) – what measures are being taken to reduce the impacts of the operation, per San Mateo County Congestion Management Plan.
7. The trucking operation as stated is greatly flawed and likely has not been vetted with CalTrans or San Mateo County, furthermore it clearly has not been reviewed by the communities using the roadway. Provide a plan on how the communities and agencies will be engaged on how best the work can be accomplished without the considerable impact.
8. It's inconceivable that anyone involved with this project would submit a trucking operation that effectively shuts down a highway and the only thoroughfare in Pacifica as a viable option.
9. The ingress and egress trucking operations impact highly used recreation areas, creating safety concerns.
10. The extent of trucking activity planned will impact the quality of the roads, parking and recreational trail, please provide a plan on how these will be maintained through the duration of the project.
11. While the workers are welcome to frequent any of the local establishments for lunch or nourishments, use of local roads and parking by the trucks must be managed so as not



to impact quality of the roads, parking facilities, etc. It is highly unlikely that any of Pacifica facilities are rated for the activity planned.

12. Provide a plan on how the egress activity will be managed
13. Provide a plan on how dispatch of vehicles in and out of the facility will be managed such that trucks are not queued on roads and/or blocking intersections.
14. Signal timing should not be adjusted to reduce the time available to local, school and commuter traffic.
15. Community meetings, online and in person, should be held on a regular basis to understand community issues, share updates and address concerns.
16. Highway shoulders are meant for emergencies, not staging. Use of shoulders to decelerate and/or stage effectively limits emergency access during congestion.

Frankly, I'm surprised that anyone would put their name and creditability on the line by putting this out. What a very poor start to your relationship Pacifica.

Regards,

Vicki Sundstrom

cc: Caltrans District 4  
San Mateo County CMP  
Pacifica Planning Commission

## Appendix A

Caltrans Annual Average Daily Traffic - Hwy 1.

Year	DESCRIPTION	BACK_AADT	% INCREASE/BACK AADT	AHEAD_AADT	INCREASE/AHEAD AADT
2013	PACIFICA, SAN PEDRO AVENUE	15000	13%	15000	13%
2016	PACIFICA, SAN PEDRO AVENUE	16000		16000	
2019	PACIFICA, SAN PEDRO AVENUE	17000		17000	
2013	PACIFICA, LINDA MAR BOULEVARD	15000	13%	32500	14%
2016	PACIFICA, LINDA MAR BOULEVARD	16000		35000	
2019	PACIFICA, LINDA MAR BOULEVARD	17000		37100	
2013	PACIFICA, ROCKAWAY BEACH AVENUE	36500	13%	47500	14%
2016	PACIFICA, ROCKAWAY BEACH AVENUE	39000		51000	
2019	PACIFICA, ROCKAWAY BEACH AVENUE	41300		54100	
2013	PACIFICA, REINA DEL MAR AVENUE (TO VALLEMAR)	47500	14%	49000	13%
2016	PACIFICA, REINA DEL MAR AVENUE (TO VALLEMAR)	51000		52000	
2019	PACIFICA, REINA DEL MAR AVENUE (TO VALLEMAR)	54100		55200	
2013	PACIFICA, SHARP PARK ROAD	47000	13%	33500	19%
2016	PACIFICA, SHARP PARK ROAD	50000		37000	
2019	PACIFICA, SHARP PARK ROAD	53000		40000	
2013	PACIFICA, CLAREDON ROAD/ OCEANA BLVD	33500	19%	33000	19%
2016	PACIFICA, CLAREDON ROAD/ OCEANA BOULEVARD	37000		34000	
2019	PACIFICA, CLAREDON ROAD/ OCEANA BOULEVARD	40000		38000	
2013	PACIFICA, MILAGRA DRIVE	33000	42%	25500	42%
2016	PACIFICA, MILAGRA DRIVE	40500		32500	
2019	PACIFICA, MILAGRA DRIVE	47000		40000	
2013	PACIFICA, MONTEREY ROAD	25500	57%	40000	38%
2016	PACIFICA, MONTEREY ROAD	32500		45500	
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Pacifica Population		
2013	37835	
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**Table 3.2-5: Peak-Hour Intersection Operations Summary – Existing and Plan Buildout Conditions**

	Intersection	Control	Peak Hour	Existing		Plan Buildout (2035)	
				Delay <sup>1</sup>	LOS <sup>2</sup>	Delay <sup>1</sup>	LOS <sup>2</sup>
CMP Intersections	1 Hickey Boulevard / SR 35	Signalized	AM	65.0	E	127.9	F
			PM	71.8	E	116.6	F
	2 Reina del Mar Avenue / SR 1 <sup>3</sup>	Signalized	AM	175.0	F	211.7 (140.5) <sup>4</sup>	F (F) <sup>4</sup>
			PM	135.5	F	236.3 (150.6) <sup>4</sup>	F (F) <sup>4</sup>
	3 Fassler Avenue / SR 1 <sup>3</sup>	Signalized	AM	93.8	F	143.3 (72.7) <sup>4</sup>	F (E) <sup>4</sup>
Non-CMP Intersections			PM	94.3	F	155.1 (79.6) <sup>4</sup>	F (E) <sup>4</sup>
	4 Crespi Drive / SR 1	Signalized	AM	25.4	C	38.2	C
			PM	18.3	B	48.7	D
	5 Linda Mar Boulevard / SR 1	Signalized	AM	65.1	E	83.1	F
			PM	107.0	F	96.0	F
	6 Hickey Boulevard / Gateway Drive	AWSC <sup>5</sup>	AM	68.0	F	71.9	F
			PM	82.8	F	87.0	F
	7 Manor Drive / Palmetto Avenue <sup>4</sup>	AWSC <sup>5</sup>	AM	14.9	B	12.7	B
			PM	24.8	C	13.2	B
	8 Manor Drive / Oceana Boulevard <sup>4</sup>	AWSC <sup>5</sup>	AM	26.3	D	13.8	B
			PM	18.6	C	16.5	C
	9 Fassler Avenue / Crespi Drive	Unsignalized	AM	6.4		7.6	
			PM	1.4		7.4	
	NB Approach	Unsignalized	AM	49.1	E	60.2	F
			PM	21.4	C	62.7	F
	WB Left	Unsignalized	AM	8.1	A	8.3	A
			PM	9.4	A	8.2	A
	10 Fassler Avenue / Terra Nova Boulevard		AM	10.1		10.1	
			PM	4.1		13.3	
	NB Approach	Unsignalized	AM	20.5	C	21.7	C
			PM	13.4	B	26.2	D
	WB Left	Unsignalized	AM	8.0	A	8.1	A

3.2.24

## Appendix B

## In DEIR

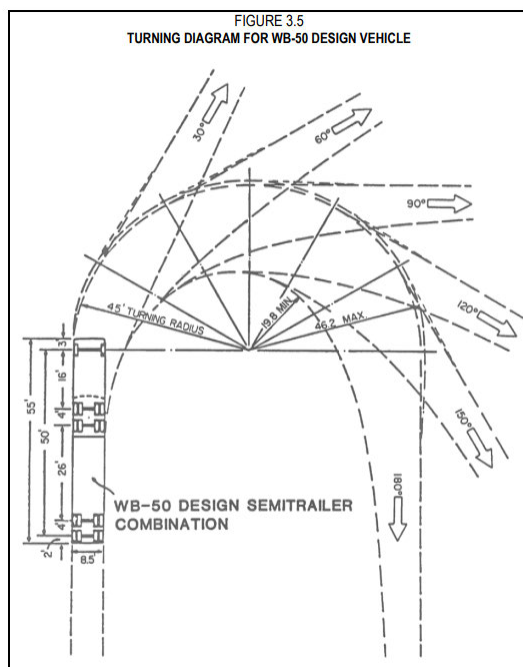
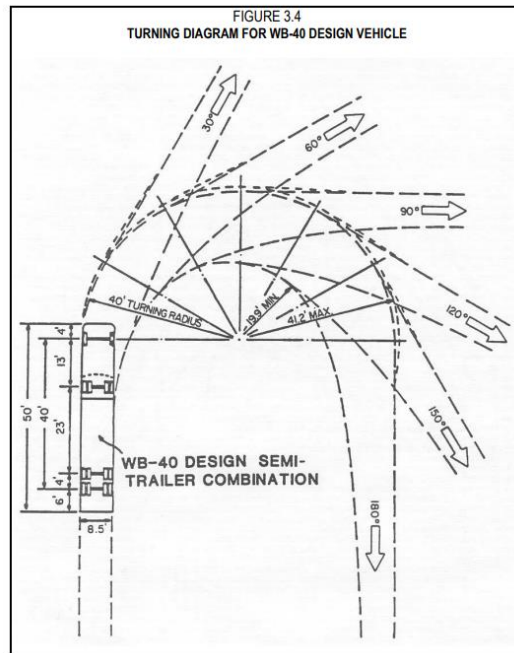
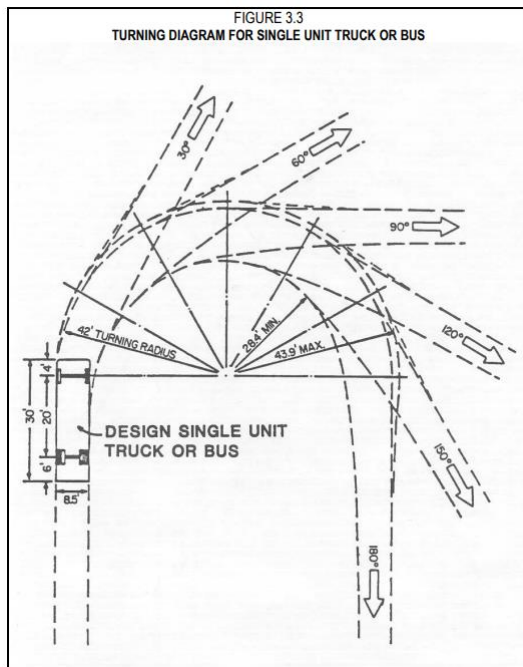
**Table 3.2-4: Peak-Hour Intersection Operations Summary – Existing and Plan Buildout Conditions**

Intersection		Control	Peak Hour	Existing Delay <sup>1</sup>	Existing LOS <sup>2</sup>	Plan Buildout (2040)	
						Delay <sup>1</sup>	LOS <sup>2</sup>
CMP Intersections							
1	Hickey Boulevard / SR 35	Signalized	AM	41.7	D	50.8	D
			PM	39.1	D	50.8	D
10	Reina del Mar Avenue / SR 1 <sup>3</sup>	Signalized	AM	61.0	E	69.6	E
			PM	35.5	D	58.2	E
11	Fassler Avenue / SR 1 <sup>3</sup>	Signalized	AM	35.5	D	38.8	D
			PM	47.8	D	37.0	D
12	Crespi Drive / SR 1	Signalized	AM	12.2	B	14.7	B
			PM	7.1	A	9.7	A
13	Linda Mar Boulevard / SR 1	Signalized	AM	17.3	B	28.0	C
			PM	27.2	C	43.6	D
Non-CMP Intersections							
2	Manor Drive / Oceana Boulevard <sup>4</sup>	AWSC <sup>5</sup>	AM	18.0	C	63.1	E
		Signalized Build	PM	23.2	C	44.3	D
3	Manor Drive / Palmetto Avenue <sup>1</sup>	AWSC	AM	32.1	D	96.9	F
		Signalized Build	PM	23.0	D	71.7	E
4	Paloma Avenue/ Oceana Boulevard	AWSC	AM	66.6	F	48.4	D
		Signalized Build	PM	15.4	C	23.5	C
5	Paloma Avenue/ Francisco Boulevard	AWSC	AM	11.2	B	17.5	C
			PM	9.8	A	13.2	B
6	Paloma Avenue/ Palmetto Avenue	AWSC	AM	12.4	B	20.8	C
			PM	12.3	B	28.7	D
7	Clarendon Road/Oceana Boulevard	AWSC	AM	12.4	B	17.1	C
			PM	12.3	B	15.1	C
8	Clarendon Road/ Francisco Boulevard	AWSC	AM	9.8	A	11.9	B
			PM	10.2	B	11.6	B

## Appendix C

## Appendix C

### Turning Radii



Why their work is inadequate -

1. Does not comply with Government Code Section 65302(b) - it does not address all existing thoroughfares and it does meet the needs of all users in provided a balanced and safe network. The code also calls for the circulation element to be aligned with the land use element - all land use changes must be accounted for in the circulation element - Sharp Park, Pedro Point, growth from planned Economic Sustainability goals (tourism and shopping). The code also requires identification of funding for identified infrastructure improvements.(no information on funding for complete streets, etc.).

Statutory Citation	Brief Description of Requirement
Gov. Code, § 65302(b)(1)	Existing and proposed major thoroughfares
Gov. Code, § 65302(b)(1)	Existing and proposed transportation routes
Gov. Code, § 65302(b)(2)	• Public transportation
Gov. Code, § 65302(b)(2)	• Bicycle
Gov. Code, § 65302(b)(2)	• Pedestrian
Gov. Code, § 65302(b)(2)	• Automobile
Gov. Code, § 65302(b)(2)	• Commercial goods
Gov. Code, § 65302(b)(1)	Existing and proposed terminals
Gov. Code, § 65302(b)(1)	Military airports and ports
Gov. Code, § 65302(b)(1)	Other local public utilities and facilities
Gov. Code, § 65302(b)(2)	Needs of children, persons with disabilities, and seniors?
Gov. Code, § 65302(b)(1); Fed. of Hillside & Canyon Assns. v. City of Los Angeles (2004) 126 Cal. App. 4th 1180, 1196	Identified funding for infrastructure identified in circulation element?
Gov. Code, § 65302(b)(1)	Circulation element is correlated with the land use element?

2. Does not provide baseline. Providing existing baseline conditions throughout the city and VMT mitigation options set the stage to include necessary improvements and VMT related policies as part of the development. Providing a clear understanding to developers what improvements are relevant to their development and expectation on VMT reduction programs.

3. How can you adequately address environmental impacts or evacuation route adequately if you don't have and sense for what's going on with the roads (baseline).

4. From the State's Technical Advisory on evaluating Transportation Impacts in CEQA.

CEQA does not allow for deferral of mitigation analysis. CEQA requires us to demonstrate a good faith effort and use substantial evidence to justify our conclusions.

Why their measures aren't enough -

1.  
VMT thresholds and reduction policy by land use. Not addressed in Pacifica documents.

E. Recommendations Regarding Significance Thresholds .....	6
1. Screening Thresholds for Land Use Projects .....	10
2. Recommended Numeric Thresholds for Residential, Office, and Retail Projects.....	12
3. Recommendations Regarding Land Use Plans.....	15
4. Other Considerations.....	15

2.

Caltrans requirement to review projects that have less than significant traffic impact on SHS.

3. VMT reduction efforts should be aligned with the cause, measurable, reportable and enforceable.



Vicki Sundstrom [REDACTED]

---

**Re: Safety concerns on Manor**

1 message

---

**Vicki Sundstrom** <[REDACTED]>  
To: "Petersen, Lisa" <lpetersen@pacifica.gov>, "Bautista, Sam" <sbautista@pacifica.gov>  
Cc: APPLE [REDACTED]

Wed, Nov 10, 2021 at 6:06 PM

Following up on this -

I hope that you all will step up to the plate and have some kind of meeting with the community about their issues. It seems like they've been ignored for some time now.

To spare Apple any more trouble with all this, I've downloaded everything onto a google folder and [shared it here](#) - I was looking through the videos shared with me and there was video of a fuel tanker driving down Manor.

There are a number of very valid concerns shared by the community - what is the proper protocol for people to be heard on safety concerns? I have heard that someone on the emergency/safety committee said that someone has to die before measures are taken - surely that's not the case - it isn't in the rest of the state.

I'd like to remain involved in this dialog, so please keep me on the distribution.

Regards,

Vicki Sundstrom

On Wed, Nov 10, 2021 at 4:07 PM Petersen, Lisa <lpetersen@pacifica.gov> wrote:

Thank you for this information. We look forward to hearing from Apple and reviewing the information she has that highlights her concerns.

Sincerely,

Lisa Petersen, P.E.  
Public Works Director  
Pacifica Public Works Department  
(650) 738-3770 desk  
(650) 730-4948 cell  
[petersenl@ci.pacifica.ca.us](mailto:petersenl@ci.pacifica.ca.us)

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

From: Vicki Sundstrom [REDACTED] >  
Sent: Wednesday, November 10, 2021 1:38 PM  
To: Bautista, Sam <sbautista@pacifica.gov>; Petersen, Lisa <lpetersen@pacifica.gov>  
Cc: APPLE [REDACTED]  
Subject: Safety concerns on Manor

[CAUTION: External Email]

Good afternoon,

One of our neighbors reached out over traffic concerns on Manor Drive. They have a very valid issue with commercial activity in the residential areas. We are talking about freight vehicles.

The residential streets were not designed for that weight and level of activity. Not to mention the speeds and basic safety concerns.

I have reached out to the emergency and safety committee and never heard back. While we have requested information about traffic studies and surveys to better understand what the city knows about the area, frankly this is something a city should be able to handle for it's residents.

Apple, a resident in the area, has numerous photos and videos documenting the problems. I am sure she will be happy to share them with you.

There is plenty of precedent where other cities have worked with apps to manage cut through traffic in residential neighborhoods. And basic signage can address freight in residential areas.

Please let us know how you would like to move forward in having the city hear and address these concerns?

Regards,

Vicki Sundstrom

Sent from my iPhone

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





Vicki Sundstrom [REDACTED]

---

**Traffic signals for Hickey/Gateway - follow up**

1 message

**Vicki Sundstrom** [REDACTED]

Tue, Jun 14, 2022 at 1:28 PM

To: "Petersen, Lisa" &lt;lpetersen@pacificacounty.gov&gt;, "Bautista, Sam" &lt;sbautista@pacificacounty.gov&gt;, "Murdock, Christian" &lt;murdockc@ci.pacificacounty.ca.us&gt;

Cc: David Whitney [REDACTED], Katherine Johnson &lt;fairmontassociationoffice@gmail.com&gt;, Public Comment &lt;publiccomment@pacificacounty.gov&gt;, Rick Nahass [REDACTED], Christine Boles [REDACTED], "Bier, Mary" &lt;mbier@pacificacounty.gov&gt;

Good afternoon Pacifica City Staff...

I am writing today about the traffic issues at Hickey/Gateway and related improvements.

In October of 2021, at both a planning commission meeting and the city council meeting on the Fairmont Shopping center, I provided comments on traffic conditions and a need for better analysis. Mr. Murdoch indicated that he did not think the traffic merited additional analysis. I welcome all of you to spend some time in the Fairmont shopping center (during the peak and weekends) and watch not just the traffic problems but also the road rage altercations courtesy of the geometry and congestion. It turns out this intersection has been an issue in front of council since at least 2015 as an intersection needing signals.

I've since provided comments about the traffic analysis on the General Plan/EIR etc specifically about this intersection and why it was removed from the level of service analysis, also requesting how study intersections were determined. The response being LOS is not required.

At the Planning commission hearing on 6/11/22 - Sam Bautista mentioned that the Hickey/Gateway intersection was listed under "policy". This intersection is not listed in the circulation element as something that needs fixing, it's not in economic sustainability as a project that needs funding. It's in the community design section - is this the "I have a dream" chapter?

Nothing I have heard so far indicates that Pacifica has any plans to address the problems we face at this location. Sam Bautista indicated a funding issue (we have had no solutions in 7 years?). In the last two years, Pacifica has managed to find money for a City Hall no one planned for and not voter approved and a seawall also not approved by the voters.

Let's get to the bottom line here - when and how will Pacifica address the traffic issues along Hickey/Gateway/Skyline? It's prudent that the community have some understanding of what is happening especially with SI wanting to add activity to "Fairmont Field".

I understand [San Mateo County](#) has all kinds of funding available for projects and it may not be too late for their May 27 submission even though the deadline has passed. The gentleman's name is listed on the page - he's happy to chat with anyone about the programs.

Regards,

Vicki Sundstrom

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**2 attachments** **changes-2.pdf**

190K



**Pacifica DEIR rev.pdf**  
2586K

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**From:** Vicki Sundstrom <[REDACTED]>  
**Sent:** Monday, July 11, 2022 10:39 AM  
**To:** Public Comment  
**Subject:** Fwd: Traffic analysis/GP/EIR etc

**[CAUTION: External Email]**

For the public record -

When asked how study intersections were determined, FEIR documents stated

CEQA. Traffic volumes on all roads were considered in the noise analysis and no substantial permanent increase in the ambient noise level would occur from vehicle traffic as analyzed under impact 3.10-1 on

**Traffic impact to noise is not a recognized means of analyzing traffic impacts to circulation, congestion and the environment.**

Christian Murdock has not responded with any further clarification.

Respectfully submitted.

Vicki Sundstrom

----- Forwarded message -----

**From:** Vicki Sundstrom <[REDACTED]>  
**Date:** Tue, Jun 14, 2022 at 2:52 PM  
**Subject:** Traffic analysis/GP/EIR etc  
**To:** Murdock, Christian <[murdockc@ci.pacifica.ca.us](mailto:murdockc@ci.pacifica.ca.us)>

Hello Christian,

I'm following up on a response to my traffic comments from the GP/EIR review. My question is irrelevant to anything CEQA or any of these documents require. This is a document that speaks to the next 20 years and the only traffic improvement plan is the Manor bridge? And we are to implement complete streets?

I want to understand how the city determined which intersections to work on and I specifically asked about how intersections were selected. I am very confused by the response I received - see quote below.

"Traffic volumes on all roads were considered in the noise analysis and no substantial permanent increase in the ambient noise level would occur from vehicle traffic as analyzed under impact 3.10-1 on page 3.10-18. "

This response says that you evaluated the noise impact from the traffic and based on the noise, it was determined that traffic was not a permanent problem? Is that correct?

Regards,

Vicki

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

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**From:** Richard Harris Jr. [REDACTED]  
**Sent:** Monday, July 11, 2022 12:15 PM  
**To:** Coffey, Sarah; \_City Council; Murdock, Christian; Public Comment; O'Connor, Bonny; Pacifica Permit Tech; Bier, Mary; Bigstyc, Tygarjas; O'Neill, Mike; Beckmeyer, Sue; Vaterlaus, Sue  
**Cc:** Woodhouse, Kevin; 'Potter, Spencer (REC)'; [REDACTED]; 'Lisa Villasenor'; 'HELEN DUFFY'; 'Leslie Davis'; 'Bob Downing'; 'Bo Links'  
**Subject:** Pacifica City Council Ajourned Special Meeting, Jy. 11, 2022, Agenda Item #1 / Pacifica Final EIR and General Plan / San Francisco Public Golf Alliance Comment  
**Attachments:** Ltr.SFPGA.Pac.CC.Comment.Gen.Plan,FEIR.7.11.22.pdf

**[CAUTION: External Email]**

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Pacifica City Council Adjourned Special Meeting, Jy 11, 2022, Agenda Item #1 / Pacifica Final EIR and General Plan / San Francisco Public Golf Alliance Comment

Please find attached above, for the record, a pdf of San Francisco Public Golf Alliance comment re Pacifica General Plan Revision and Final EIR. Please include this in the record, and distribute to Individual City Council Members in advance of the July 11 7 p.m. Adjourned Special Meeting re hearing on the Pacifica General Plan Revision and Final EIR.

Thank you.

- Richard Harris
- San Francisco Public Golf Alliance
- [REDACTED]
- San Francisco, CA. 94117
- [REDACTED]

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# SAN FRANCISCO PUBLIC GOLF ALLIANCE



1370 Masonic Ave., San Francisco, CA 94117 • 415-290-5718 • [info@sfpublicgolf.org](mailto:info@sfpublicgolf.org)

July 11, 2022

By e-mail:

[publiccomment@pacifica.gov](mailto:publiccomment@pacifica.gov)

[citycouncil@pacifica.gov](mailto:citycouncil@pacifica.gov)

[scoffey@pacifica.gov](mailto:scoffey@pacifica.gov)

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

Re: City Council Adjourned Special Meeting, Monday, July 11, 2022, Agenda Item 1:  
A. Re certification of Final EIR; and  
D and E: Approval of Pacifica General Plan Update and Incorporation of All Maps, etc.  
Comments of San Francisco Public Golf Alliance

Dear Pacifica City Council,

EXECUTIVE SUMMARY: SAN FRANCISCO PUBLIC GOLF ALLIANCE REQUESTS COUNCIL CORRECT ERRORS WHERE THE VERSIONS OF THE FINAL EIR AND GENERAL PLAN IN COUNCIL'S JULY 11, 2022 AGENDA PACKET FAIL TO INCORPORATE TWO SMALL WORDING CHANGES TO THE FINAL EIR AND GENERAL PLAN, MADE ORALLY BY THE CITY COUNCIL AT ITS JUNE 25, 2022 SPECIAL MEETING AND BY THE PLANNING COMMISSION AT ITS JUNE 11, 2022 DELIBERATION:.

- (1) In Attachment H – FEIR Appendix B -- the Final EIR Redline (found at the URL at Packet Pg. 3544/4211: <https://cityofpacifica.egnyte.com/dl/mccqSGSmU7>), at Figure 3.8-1 (560/1125) a flag label should be corrected to read: "Sharp Park Golf Course and Clubhouse" (the two words "and Clubhouse" have been mistakenly omitted from the FEIR in City Council's July 11, 2022 Agenda Packet); this requested correction is shown at **EXHIBIT 2**; and
- (2) In the Final General Plan, Attachment C, Chapter 7, Conservation, at Page 7-42 (Packet Pg.739/4211) under "Historic Resources," at third paragraph of text, the phrase ". . . the Sharp Park Golf Course clubhouse . ." should be amended to add the word "and" between "Golf Course" and "clubhouse," so that the corrected phrase reads ". . . the Sharp Park Golf Course **and** clubhouse . . ."; this requested correction is shown at **EXHIBIT 3**.

These requested corrections were made orally by the Planning Commission in its June 11, 2022 deliberations, as shown in the partial Transcription of that meeting, which Transcription is attached hereto as **EXHIBIT 1A**, incorporated herein by this reference, and confirmed by the City Council at its June 25, 2022 Special meeting, as shown in the partial Transcription of that meeting, which Transcription is attached hereto as **EXHIBIT 1B**, incorporated by this reference. However these two changes were somehow overlooked in the preparation of the documents that are in the Council's Agenda Packet for the July 11, 2022 meeting.

**We respectfully request that City Council make certain that these requested corrections are made – in writing – in the Final EIR and the Final Revised Pacifica General Plan.**

## **DISCUSSION**

This letter follows-up on our letters to City Council of March 7, 2022<sup>1</sup> and June 22, 2022<sup>2</sup> in this same matter, which are in Council's file, and which are incorporated by this reference. In those letters, we detailed a seven-year history, going back to 2015, of San Francisco Public Golf Alliance submitting written comments in Pacifica's General Plan Revision and related Environmental Impact Review process, substantiating the historical provenances of both the Sharp Park Golf Course and its Clubhouse, and the Pacifica Planning Department and its consultant Dyett & Bhatia acknowledging in writing that both the Golf Course and the Clubhouse are Pacifica historical landmarks and stating that the text and related Figures and Charts in the Revised General Plan and Environmental Impact Report would be corrected to identify both the Golf Course and the Clubhouse as Pacifica historical landmark properties – but then failing to make the promised corrections in the documents.

Responding to our March 7, 2022 comment letter (which it identified as Comment Letter 128-1), the Pacifica Planning Department in the Response to Comments Section, page 625 of the Final EIR (at July 11, 2022 Meeting Packet Page 1485) , admitted to an “accidental omission,” and said that error would be corrected.<sup>3</sup>

We are now concerned that we are seeing this same pattern repeating in the Revised General Plan and Final EIR documents presented to City Council in Council's Agenda Packet for Council's Adjourned Special Meeting calendared for July 11, 2022.

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<sup>1</sup> Letter, March 7, 2022, San Francisco Public Golf Alliance to Pacifica Planning Department <https://drive.google.com/file/d/1Se6duX6FtVR1k0McXz2AUzNMKZ7xVde/view?usp=sharing>

<sup>2</sup> Letter, June 22, 2022, San Francisco Public Golf Alliance to Pacifica City Council: [https://drive.google.com/file/d/1n617-dykuEGmse\\_8RB887mL9EWOWqBkN/view?usp=sharing](https://drive.google.com/file/d/1n617-dykuEGmse_8RB887mL9EWOWqBkN/view?usp=sharing)

<sup>3</sup> “The comment accurately describes the accidental omission of the entire Sharp Park Golf Course as a historic resource, and is noted and appreciated. The comment stated that that Sharp Park Golf Course itself—and not only the Clubhouse—should be identified in the General Plan and EIR as an historic resource. . . the Draft EIR has been updated to reflect this change.”. Response to Comments Pg. 625, Final EIR (Packet Pg. 1485).

But the errors were not fully corrected in the May 2022 drafts submitted by the Planning Department to the Planning Commission, so we submitted an April 6, 2022 comment letter to the Commission, detailing the Department's repeated and continuing failures, since 2015, to make promised corrections to the EIR and General Plan documents.<sup>4</sup>

As of July 11, 2022, the problem had still not been completely corrected in the documents: the Draft Final EIR's Figure 3.8.1 has been changed to identify the Sharp Park Golf Course as an Historic Property, but the identification does not include "and clubhouse"<sup>5</sup>; and (2) although the Draft Revised General Plan's Table 7-5 (Historic Sites) and Figure 7-4 (Historic and Cultural Resources) have been changed to identify as historic resource properties "Sharp Park Golf Course and clubhouse", the Historic Resources text – on the very same page that contains the corrected Table 7-5 – continues to identify only the "Sharp Park Golf club house" – **but not the golf course itself** -- as a Pacifica historic resource.

At the Planning Commission's June 11, 2022 Deliberation, the Commission discussed these two points among themselves and with Planning Staff and with Ms. Moore, a planner with the City's consultant Dyett & Bhatia. The Commission agreed that these remaining two errors would be corrected in the Final Versions of the EIR and the General Plan to be submitted to City Council:

- (1) In discussion between Commission Vice Chair Hauser, Acting Planning Director Murdock, and Dyett & Bhatia's Ms. Moore, at 1:01:10 through 1:03:21 of the Commission's June 11, 2022 meeting, the Commission agreed that the "Historic Cultural Resources" map, Figure 3.8-1 of the Final EIR, will identify the "Sharp Park Golf Course and Clubhouse"<sup>6</sup> in the Final EIR, "Sharp Park Golf Course and Clubhouse" will be designated on the "Historic and Cultural Resources" map, Figure 3.8-1 (discussion between Commission Vice-Chair ; and Hauser); and
- (2) in the Final General Plan, the text of Chapter 7, Conservation, at subchapter 7.2, page 7-42, Historic Resources, will be amended to add the word "and" between "Sharp Park Golf Course" and "clubhouse"<sup>7</sup> This correction will make the General Plan text consistent with the text of the Redline Final EIR and with the Final General Plan's Table 7-5 and Figure 7-4.<sup>8</sup>

These two requested changes are shown at Exhibits 2 and 3.

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<sup>4</sup> Letter, April 6, 2022, San Francisco Public Golf Alliance to Pacifica Planning Commission <https://drive.google.com/file/d/1i2Aeg9dr6AMyKybMxM5GelcigiYvwNMf/view?usp=sharing>

<sup>5</sup> See Final EIR, Attachment H – FEIR Appendix B -- the Final EIR Redline (found at the URL at July 11, 2022 Packet Pg. 3544/4211: <https://cityofpacific.egnyte.com/dl/mccqSGSmU7>), at Figure 3.8-1 (560/1125)

<sup>6</sup> See Exhibit 1A, Partial Transcript of Planning Commission's June 11, 2022 meeting, at 1:01:10 -- 1:03:21.

<sup>7</sup> See Exhibit 1A, Partial Transcript of Planning Commission's June 11, 2022 deliberations, comments by Commission Chair Berman at 4:30:52 through 4:31.48, and at 5:03:58.

<sup>8</sup> See the Partial Transcription of the Commission's June 11, 2022 Deliberations at Exhibit 1 hereto, being a partial transcription of that meeting as recorded by Pacific Coast TV: <https://www.youtube.com/watch?v=tac27BsY5jQ&list=PLFUunuheJ0ZUFzWFh7IOpSSOdUYabsEZK&index=1&t=17866s>



At the City Council's June 25, 2022 Special Meeting regarding the Amended Pacifica General Plan and accompanying Final EIR, the Council discussed these two points with Acting Planning Director Murdock, and instructed – as seen in the Partial Transcription of Council's June 25 meeting, Exhibit 1B hereto, that these two corrections be made to: (1) amend the text of the Conservation Element, Chapter 7 of the General Plan, "Historic Resources," at page 7-42, to include "Sharp Park Golf Course **and** Clubhouse" in the text list of local Pacifica landmarks<sup>9</sup>; and (2) the Final EIR "Historic Cultural Resources" map (Figure 3.8-1), will identify the historic "Sharp Park Golf Course and Clubhouse. (See Partial Transcript of June 25, 2022 Special City Council Meeting, Exhibit 1B hereto, at Murdock, 0:42:44-43:20 and 4:41:00-41:35; and Bygystyck, at 4:40:21 and 4:42:40-43:00.)

## CONCLUSION

Although these corrections have been committed to orally and on the record by the both the Planning Commission and the City Council, the corrections do not appear in writing in the documents submitted by the Planning Department in Council's Meeting Packet for Council's approval at the Special Meeting of July 11, 2022. Given the problematic history, recounted in our letters of March 7 and June 22, 2022 (at footnotes 1 and 2, above), we respectfully request that we and Council see these two changes **in writing before** Council approves the Revised General Plan and accompanying Final EIR.

The San Francisco Public Golf Alliance is a non-profit, pro-bono organization representing 6,500-plus men and women members -- a substantial number of whom are Pacifica residents.

Respectfully submitted,  
San Francisco Public Golf Alliance

*Richard Harris*

Richard Harris, President

encls.

ccs:

Pacifica City Council Members

Pacifica City Clerk Sarah Coffey

Pacifica Planning Department,

Christian Murdock, Acting Director

Bonny O'Connor, Assistant Pacifica Planner

Pacifica Planning Commission

Pacifica City Manager Kevin Woodhouse

Pacifica Historical Society

Spencer Potter, SF Recreation and Park Department

Lisa Villasenor, Sharp Park Business Women's Golf Club

Bob Downing, Sharp Park Golf Club

Bo Links

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<sup>9</sup> Final General Plan, Attachment C, Chapter 7, Conservation, at Page 7-42 (July 11, 2022 Packet Pg.739/4211) under "Historic Resources," at third paragraph of text, the phrase ". . . the Sharp Park Golf Course clubhouse . ." should be amended to add the word "and" between "Golf Course" and "clubhouse," so that the corrected phrase reads ". . . the Sharp Park Golf Course **and** clubhouse . . ."; as shown at **EXHIBIT 3**

## **EXHIBIT 1A**

### **Transcript (partial), Pacifica Planning Commission Mtg, 6.11.22**

Transcribed by Richard Harris, 6.16.22

#### **Pacific Coast TV**

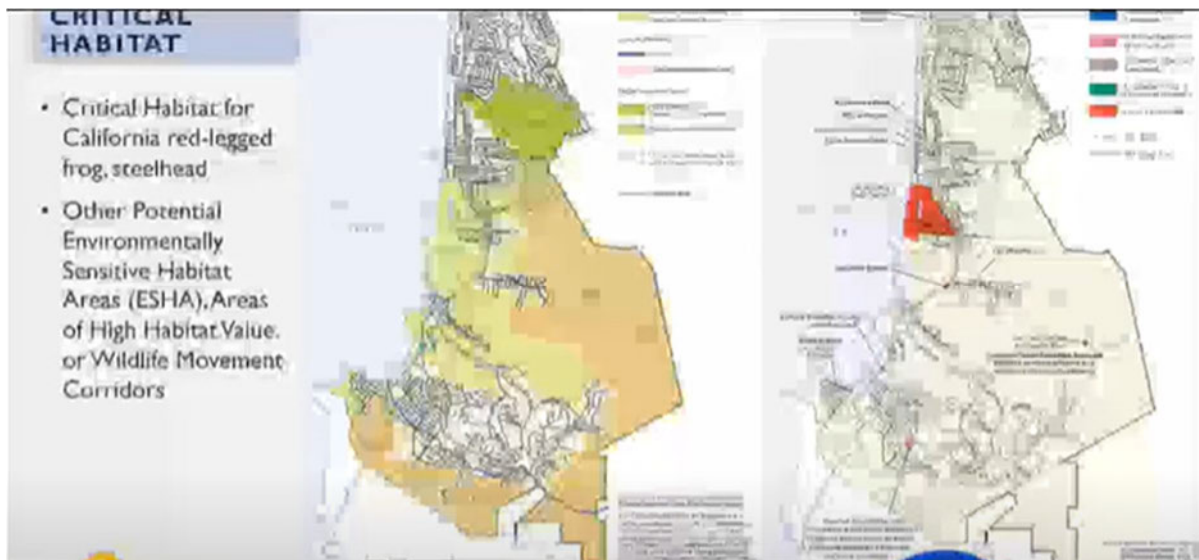
<https://www.youtube.com/watch?v=tac27BsY5jQ&list=PLFUunuheJ0ZUFzWFh7lOpSSOdUYabsEZK&index=1&t=17866s>

#### **1:01:10 – 1:01:45 Vice-Chair Hauser**

I have kind of a cultural/historic question based on two comments that we received on Monday. The first was there was a comment about the golf course and the clubhouse as historic resources. And there was a note the staff had sent, the publication of this noted that the clubhouse was also historic. It sounded from the caller's perspective like this was just an easy language tweak. And so I would love staff to weigh in on that.

#### **1:02:15 – 1:02:34 Christian Murdock**

Sure. Miss Moore, did you want me to display the map of historic and cultural resources that you prepared? I apologize. It's a combined slide, it's got two figures on it, but please look at the right side of the screen for the map of historic and cultural resources contained in the Draft General Plan.



#### **1:02:40. Ms. Moore [Dyett & Bhatia]**

So the entirety, well, let's let Christian get the map going, the entirety of the golf course is shown as a local landmark now, per the commenter's suggestion. I think that additional, he desires additional clarification just in terms of the text addition that the clubhouse is included on there. But that has been incorporated.

#### **1:03:02 Vice-Chair Hauser**

So if on this leader that says Sharp Park Golf Course, you corrected that to say, corrected is maybe, that's a presumptuous word, if you updated that to say Sharp Park Golf Course and Clubhouse, is that something that is easy, and, OK

#### **1:03:20 Moore: Absolutely**

**EXHIBIT 1A, cont.**

**Transcript (partial), Pacifica Planning Commission Mtg, 6.11.22**

**1:03:21 Vice-Chair Hauser**

OK . . . . .

**4:30:52 Chair Berman**

Now we're going to move on to [General Plan] Chapter 6. Commissioner Hauser.

**4:30:58 Vice-Chair Hauser**

I only have one, and it's quick. It's as a response to Mr. Harris' comments that we discussed earlier, by question. I would like to propose two different changes. One on the first page of Chapter 6, the third paragraph down. It says: and has a historic coastal public golf course. I'd like to amend that to say: has a historic coastal public golf course and clubhouse. And then on Diagram 6-1 I would like to include both the clubhouse and the golf course in there and I'd like to add the word historic there just for avoidance of doubt.

**4:31:48 Chair Berman**

Thank you, Commissioner Hauser. I agree with those and also in my e-mail that I sent to Staff I have a clarifying item and also it was forwarded to the Commission for public record, I believe I asked the word clubhouse be added to one of the tables, for consistency.

**4:56:35 Chair Berman**

OK. The Commission seems to have reached a consensus on Chapter 6.

**5:03:28 Chair Berman**

Sorry. I mentioned clubhouse, because I see that the table that I mentioned previously that the golf course clubhouse needs to be added to, is actually Table 7-5.

## **EXHIBIT 1B**

### **Transcript (partial), Pacifica City Council Special Mtg, 6.25.22**

Transcribed by Richard Harris, 6.27.22

#### **Pacific Coast TV**

[https://www.youtube.com/watch?v=47R12Kztjgs&list=PLFUunuheJ0ZU25laKfa31mnHMxGy\\_V4Ob&index=1](https://www.youtube.com/watch?v=47R12Kztjgs&list=PLFUunuheJ0ZU25laKfa31mnHMxGy_V4Ob&index=1)

#### **42:44 – 43:20 Christian Murdock**

[Showing Power Point Slide 53, which states in part: “All figures: Label Sharp Park Golf Course as “Historic Sharp Park Golf Course and Clubhouse”]

Now I’m going to go through the small number of amendments that the Planning Commission Liaison identified that did not make it in between the Commission recommendation public hearing and the publication of this packet. And we can revisit these certainly. We just want to introduce them for the Council and the public record. And we could come back to them at the appropriate time in the public hearing. First off, all figures throughout the Plan. There was public input in support from the Commission to really highlight and reinforce the historic nature of the Sharp Park Golf Course and Clubhouse and so insuring all of our figures that label the Sharp Park Golf Course reflect those historic components.”

#### **4:40:15 - :17 Mayor Bier**

On to Conservation [Gen. Plan Ch. 7 – Conservation ]

#### **4:40:21 Councilmember Bygstyck**

Madame Mayor, before we move on to Conservation, I was reviewing my notes from the beginning of the meeting, and question for Christian. I should have caught it back in the fifth section. In the beginning of the meeting you were talking about a series of Planning Commission items that didn’t quite make it, and you were letting us know that they should have made it but didn’t quite. So did you want to go over those as we go through these or are you just saying them so we can give you a blanket yes, please include them all. So I was going back to the map 5-4 with the restrooms and But I wasn’t sure whether we are to do that as we go along, or if it’s just kind of assumed we’re going to go along with it.

#### **4:41:00 – 4:41:35 Acting Planning Director Murdock**

Yes. Thank you Mayor Pro Tem Bygstyck. What I had suggested in my recommendation is that the Council go through its own questions and deliberations on the documents, then we could revisit those additional suggested revisions, and then those indicated in the Staff Report for final confirmation. I’m happy to take them in whatever order, but it may be a little hard to sort of just plug them in as we go. Perhaps after getting through here and having familiarity with the chapters, it may be easier to just sort of go down the punch list. But yes that fits in with what we talked about and understand.

#### **4:42:20 - City Manager Woodhouse**

Mayor Bier, are we on to Chapter 7?

#### **4:42:25 Mayor Bier**

We are.

## **EXHIBIT 1B, cont.**

### **Transcript (partial), Pacifica City Council Special Mtg, 6.25.22**

Transcribed by Richard Harris, 6.27.22

#### **4:42:40 – 4:43:00 Councilmember Bygstryck**

This is the place where it would be appropriate to stick in that edit that Mr. Harris recommends on page 544, and I think it was just a matter of inserting an “and” to say Golf Course and clubhouse as historic. [Christian Murdock nods, but says nothing]

#### **5:37:50 Mayor Bier**

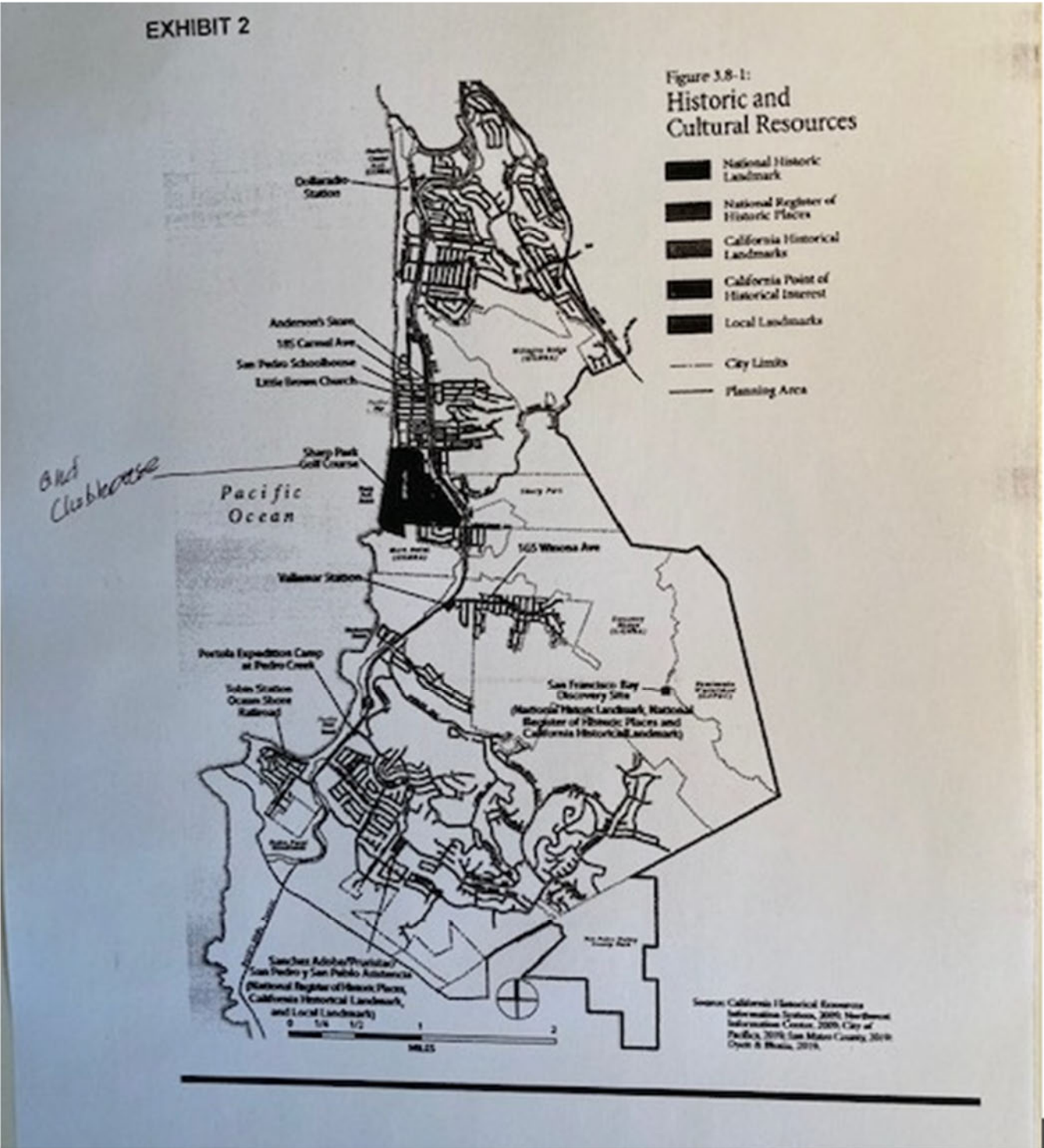
All right. So we’ll go over our review, and then City Attorney can help us out.

#### **5:38:03 Acting Planning Director Murdock**

Terrific. Thank you Mayor Bier. So I will go ahead and pull up the additional amendments from the Planning Commission. Again, a reminder that there are packet page references to the policies in question. [Shows “Additional Amendments” slide, including: “All figures: Label Sharp Park Golf Course as “Historic Sharp Park Golf Course and Club House”] So the first being at the top. Really no packet page on that one, as I say that, but a general principal of updating the labels on all figures in reference to the Sharp Park Golf Course as the “Historic Sharp Park Golf Course and Clubhouse,” to emphasize the historic nature of that site.”

**ADJOURN ITEM 1 (Gen. Plan and EIR) to Continued Special Meeting and Regular Meeting, July 11. The Sharp Park Specific Plan will be considered by City Council at a later meeting, to be set at a future uncertain time. Planning Commission has already continued its deliberation re the Sharp Park Specific Plan to July 18.**

EXHIBIT 2





## EXHIBIT 3

### Historic Resources

The Portola Expedition Camp at San Pedro Creek, the Discovery Site, and the Sanchez Adobe are State Historical Landmarks. Tobin Station, one of two remaining structures from the Ocean Shore Railroad, is a State Point of Historical Interest.

A Master Plan for the Sanchez Adobe Historical Site, completed in 2007 aims to increase visitation and improve visitors' educational experience while ensuring that the site is preserved for future generations. The new interpretive center was completed and opened to the public in October 2019.

The City has identified nine local historical landmarks: Sanchez Adobe; the Little Brown Church; the former San Pedro Schoolhouse (now City Hall); the 1907 Anderson's Store building on Paloma Avenue;

the Sharp Park Golf Course club house, from 1932; Vallemar Station; the former Dollaradio Station; and two private residences (see Table 7-5).

In 2005, the Pacifica Historical Society began restoration of the Little Brown Church to establish it as into the Pacifica Coastside Museum, which opened in 2015. The Historical Society also owns the last remaining car from the Ocean Shore Railroad, and has stated its interest in moving the railcar to be close to the Little Brown Church, preferably in the parking lot at Sagrada Avenue and Francisco Boulevard. The City is considering this as the potential location of the railcar as part of a Civic Center master plan discussed by City Council in 2021. Nine local historic landmarks in Pacifica are specifically designated in the Historic Preservation Ordinance of 1985. They are listed below in Table 7-5 and also shown in Figure 7-4.

Table 7-5: HISTORIC SITES IN PACIFICA

Site	Address	Year Constructed
<b>National Historic Landmarks</b>		
Little Brown Church	1850 Francisco Boulevard	1910
<b>National Register of Historic Places</b>		
San Francisco Bay Discovery Site	Sweeney Ridge	NA
<b>California Historical Landmarks</b>		
Portola Expedition Camp at Pedro Creek	Southeast of SR 1 and Crespi Drive	NA
San Francisco Bay Discovery Site	Sweeney Ridge	NA
Sanchez Adobe / Pruristac / San Pedro y San Pablo	1000 Linda Mar Boulevard	1842
<b>California Point of Historical Interest</b>		
Tobin Station-Ocean Shore Railroad	Shoreside Drive, Pedro Point	
<b>Local Landmarks Identified in Historic Preservation Ordinance</b>		
Anderson's Store	220 Paloma Avenue	1907
Little Brown Church	1850 Francisco Boulevard	1910
San Pedro Schoolhouse	170 Santa Maria Avenue	1914
Sanchez Adobe / Pruristac / San Pedro y San Pablo	1000 Linda Mar Boulevard	1842
Sharp Park Golf Course and Clubhouse	Sharp Park Road & SR 1	1932
Vallemar Station	2125 Coast Highway	1906
Private residence	165 Wilona Avenue	1908
Private residence	185 Cannell Avenue	1910
Dollaradio Station (private residence)	100 Palmetto Avenue	1926

Source: California Historical Resources Information System, 2021; City of Pacifica, 2020.