

Public Comments

Item 1 – LCLUP Community Roundtable Discussion

Written Comments Received By 12pm on 12/05/2023



December 5, 2023

Open Study Session

From: Cindy Abbott [REDACTED]
Sent: Monday, December 4, 2023 2:44 PM
Cc: oceane.ringuette@coastal.ca.gov; KoppmanNorton, Julia@Coastal
Subject: City of Pacifica Dec 5 Meeting

[CAUTION: External Email]

Dear Mayor and Councilmmembers,
How utterly shocking and frankly disturbing to find out -- after staff repeatedly stated to you and the public on Monday, November 13, 2023, that the sole purpose of "Meeting #2" on Dec 5 would be a detailed review of the Coastal Commission staff recommendations to the draft LCPLUP -- that an entirely new never before shared plan is being proposed for a portion of West Sharp Park and Rockaway Beach. To quote from the staff report "...Meeting #2 is the first time the SRA provisions will be available for public review..." I hope that you, like me, find this an unconscionable move on the part of city staff. What I see clearly is NO interest in transparency or honesty.

The staff report does not provide detailed justification for this abrupt change in strategy or how it will impact the overall time-sensitive approval of the draft LCLUP. The concept is an inadequately developed idea of "neighborhood planning" that tosses out decades of Coastal Act policy, and continues the City of Pacifica's push back on actual long-range coastal resiliency planning that would protect and celebrate our most important public asset -- the coast, it's beneficial public resources, and stewardship of public trust lands.

Carving out significant parts of the coastline into "Special Resiliency Areas" is only a misnomer for a strategy to place future generations at risk and saddled to maintaining damaging shoreline "protection" devices to the detriment of coastal habitat and public access.

I believe it is an egregious misstatement that such a last minute attempt to throw out years of community input and planning, and Coastal Act provisions, provides a "reasonable basis to begin the public input process" or that it would even be considered by the members of the California Coastal Commission. (Staff Report Page 5, Packet Page 7, These alternative adaptation strategies reflect staff-level discussions based on both CCC and City staffs' years of experience participating in coastal planning processes in Pacifica. Each agencies' staff believes the policy approaches described in Attachment A would address many of the most significant issues raised throughout Pacifica's LCLUP update process, provide a reasonable basis to begin the public input process to consider whether the right balance has been achieved, and with further refinement could reflect a

set of policies that each agencies' staff would recommend for approval by their respective decision makers...)

The staff report also continues the ongoing biased and non-fact based attitude that the West Sharp Park or West Rockaway Beach areas will no longer be invested in and that there will be a "detrimental impact to Pacifica and Coastal Act consistency" (Packet page 7) if "Special Resiliency Areas" aren't adopted -- or if the logical and reasonable long-term planning approaches that have been made by the CCC staff in it's prior detailed review of the LCLUP aren't implemented. Continuing to defend hard armoring that has plagued Pacifica's beaches and coastline since the 1980's as the only approach forward is not only misleading but misguided. (Note: In 2008, the City of Pacifica received approval to repair and maintain the Beach Boulevard Rock Revetment. The conditions of approval that the City accepted included an understanding that the City of Pacifica would maintain the revetment for the length of it's life -- not forever. And the conditions of approval also clearly indicated NO EXPANSION OR ENLARGEMENT OF THE EXISTING BEACH BOULEVARD REVETMENT IS PERMITTED. The City of Pacifica has had many years to develop alternative plans.)

The "Alternative Adaptation Strategies in Pacifica" document doesn't share adaptation strategies - they are DEVELOPMENT strategies that don't provide justification for how these will benefit future generations of citizens and visitors in the City of Pacifica, keeping them safe from the impact of the climate crisis and its resulting increased storms, erosion and future sea level rise, while protecting the coastal zone environmental and increasing coastal access. Instead it seems to allow for:

- Increased density and waiver of planning standards *IN THE EXACT AREA OF THE COASTAL HAZARD ZONE!*
- Increased heights in both SRAs, when the Planning Commission and City Council specifically indicated their interest and approved NO HEIGHT INCREASES in West Sharp Park residential neighborhoods that are adjacent to Palmetto Avenue.
- NO parking requirements in an area already challenged and no plan to provide additional parking other than for bikes while trying to increase density and increase coastal visitor serving access.
- No mention of trying to increase public transit

No amount of "covered picnic tables and bike racks" can undue this harm.

At the last meeting City staff and Council noted how they are concerned with an increase in coastal hazard monitoring twice a year as modified by CCC staff versus the once currently in the plan. Yet, now there is staff available to administer these convoluted additional processes for two specialty areas?

Hopefully I'm reading this wrong and if so, that should make it clear how poorly the documentation on this dramatic change is being made to the public. And, the expectation

for the public to provide cogent comment sitting around tables with the limited amount of information available is incredibly disrespectful to those who have been actively participating in this process since the beginning AND equally disrespectful to those who are stepping more recently. Please, as requested at the November meeting, change the format of the meeting from community table discussions to a robust open to all question and answer session that might provide some actual value.

I ask that you recognize that these comments are being made by an actively engaged community member who lives in and loves this community. And, one who has unfortunately with this about-face in direction being proposed by City staff, lost what little trust I had left in this process that I've been taking part in since 2009.

Cindy Abbott
West Sharp Park

cc: California Coastal Commission

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

From: Samuel Casillas [REDACTED]
Sent: Monday, December 4, 2023 6:05 PM
To: Public Comment
Cc: KoppmanNorton, Julia@Coastal; Ringuette, Oceane@Coastal; Rexing, Stephanie@Coastal
Subject: Special Meeting – Study Session 12/5/2023 – LCLUP Community Roundtable
Attachments: LCLUP community meeting comments casillas 12 5 23.docx

[CAUTION: External Email]

Please see my attached comments for the LCLUP community Roundtable.

Regards,
Sam Casillas

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

Pacifica City Council
1800 Francisco Boulevard
Pacifica, CA 94044
publiccomment@pacifica.gov

Date: November 13, 2023

Subject: Study Session 11/13/2023 - LCLUP

Dear City Council:

On multiple occasions the California Coastal Commission (CCC) Staff has requested additional data due to the extensive changes to the 1980 LCP for specific sites, including the Undeveloped San Pedro Avenue Site and the Quarry from the City of Pacifica. Many concerned citizens and community organizations have actually provided the latest environmental hazards and biology reports including those from USGS and the CCC itself, but the city continues to disregard this data. By ignoring the presented hazard and environmental restraints data for these undeveloped sites, including flooding (which includes the annual formation of a lake on the San Pedro Ave site (see exhibit A), SLR issues, liquefaction, tsunami danger, federally designated wetlands, as well as ESHA and protected species habitat the city in violation of multiple CEQA and state laws. The city instead continues to attempt to change these properties designations to residential and planned development although all scientific data dictates they should be designated Conservation. The City's DRAFT Local Coastal Land Use Plan's "Environmental and Scenic Resources" and "Natural Hazards" chapters ignore all this data for these sites and also ignores the erosion data for the area known as Aramai Point which invalidates the Land Use Designations (LUD) for these areas and may jeopardize the whole 2040 GP with these willfully misinformed policies.

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

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

Due to the violation of this CEQA guideline the current DRAFT LUD/LCLUP is in violation of CEQA. The city is aware that it should be using existing conditions to determine the new LUD, which would heavily favor Conservation. Section 15125 backs this view and "ensuring all biological constraints are

considered" is not adequately addressed as existing conditions in the Quarry, Aramai Point and the Pedro Point site would dictate otherwise. Additionally, as policy the city's GP/LCP/EIR erroneously allows a deferred analysis as "site-specific as part of proposed development review" for hazards and biological studies to be done at the time a project is proposed. The city is advised that this policy is in violation of CEQA and may end up invalidating the whole 2040 GPU. By changing LUDs without proper CEQA/CA review the city is also purposely setting itself up for a "taking" of private land and would therefore violate its fiduciary duty to protect the city from potential liability.

The city is also required under SB379 to utilize/restore identified appropriate sites to employ as nature-based solutions for climate resiliency, yet the city is again deferring the selection of SB379 sites without explanation. The San Pedro and Quarry sites should be recorded as SB379 sites.

Also, the city's use of 1-2 feet Sea Level Rise by 2050 risk is inadequate due to the lack of acknowledging scientific data that we should be planning for the "extreme risk" scenario which the city is not considering. The city also needs to consider a 100 year time horizon as dictated by design life policies.

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

In a separate Coastal Act violation of Section 30252 (Maintenance and enhancement of public access) the city has changed Coastal Access Point 25 which is an established beach access point to a view point and should remain a beach access point.

Regards,

Samuel Casillas

Board member, PPCA

Past Vice-Chair, Pacifica Economic Development Committee

Past Member, Pacifica Sea Level Rise Adaptation Planning Committee

Past Co-Chair GGNRA Board Liaison Committee

Past Member, Pacifica GPU Community Outreach Committee

Exhibit A



Pedro Point Field flooding Oct 24th, 2021

Exhibit B

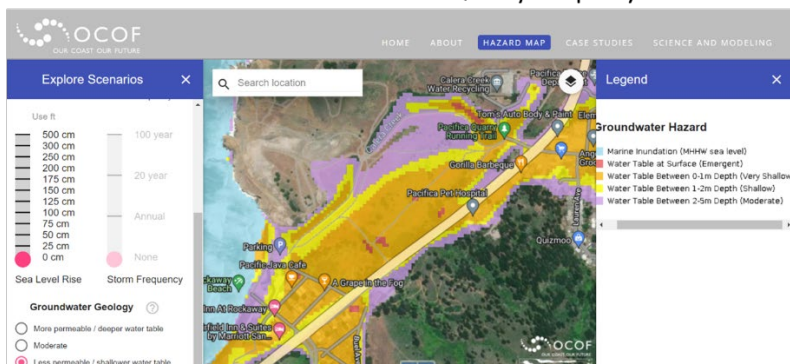
CCC Biologist Findings from its denial of an adjacent property at 505 San Pedro Ave (CDP application 2-19-0026 hearing on 3/12/21)



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

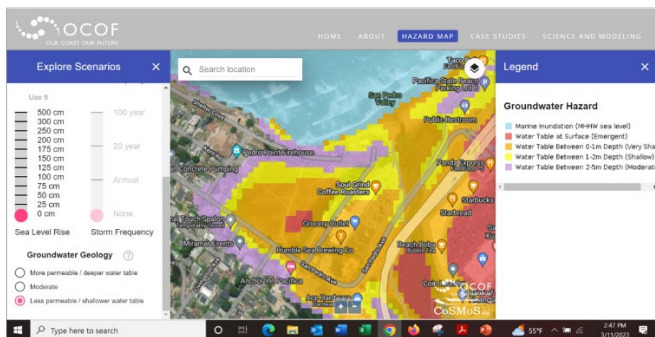
Exhibit C

Groundwater Hazard at Quarry Property



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

Groundwater hazard at Pedro Point Field and 505 San Pedro Ave



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

From: MELINDA MacNaughton [REDACTED]
Sent: Monday, December 4, 2023 5:33 PM
To: Public Comment; Cervantes, Stefanie
Subject: Fwd: Malibu Pesticide Reduction LCP amendment

[CAUTION: External Email]

Hello Stefanie,
Here is the message I sent to Christine yesterday with the amendment and added info.
Thank you,
Melinda

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

From: MELINDA MacNaughton [REDACTED]
To: "cboles@pacifica.gov" <cboles@pacifica.gov>
Cc: Kian Schulman [REDACTED]
[REDACTED]
Date: 12/03/2023 12:45 PM PST
Subject: Re: Fwd: Malibu Pesticide Reduction LCP amendment

I also forgot to add that Sonoma County has officially added this amendment into their LCP as well.
Thank you,
Melinda

On 12/02/2023 6:47 PM PST MELINDA MacNaughton [REDACTED] wrote:

Hi Christine,

Here is the Malibu LCP reduced pesticide use amendment in red that has been approved and officially adopted into the Malibu LCP, the LA County LCP, and the Ventura County LCP. They are currently working with Laguna Beach to adopt it.

This is a very important climate related amendment to protect our very sensitive habitat from being exposed and harmed by continued pesticide use in the Parks, roadsides, and other areas of cities. Pesticides negatively affect climate resilience, sensitive ecosystems, soils, watershed, and fire mitigation (where invasive plants are sprayed and left as fuel load). See the forwarded message below which I adapted to be directed to Pacifica. We hope the council will be willing to consider adding this to the LCP since the LCP does not get reviewed for years and it could be a very long time before this amendment could be implemented....and as you know we don't have much time to mitigate climate change.

If you want further information on how pesticides affect our climate, ecosystems and soils, please see this presentation I gave on behalf of El Granada and the coastside community regarding our community asks to provide transparency and accountability of pesticide use in San Mateo County and the Parks. If you watch the first 12 minutes, it will show you our extensive research and I can also send references. Let me know. This link starts at the beginning of our presentation:
<https://youtu.be/ljVA5rTxNco?t=5350>

Please see the amendment and details below:

Malibu LCP amendment -

"Except as permitted pursuant to this provision or Policy 3.20, throughout the City of Malibu, development that involves the use of pesticides, including insecticides, herbicides, rodenticides or any other similar toxic chemical substances, shall be prohibited in cases where the application of such substances would have the potential to significantly degrade Environmentally Sensitive Habitat Areas or coastal water quality or harm wildlife. Herbicides may be used for the eradication of invasive plant species or habitat restoration, but only if the use of non-chemical methods for prevention and management such as physical, mechanical, cultural, and biological controls are infeasible. Herbicides shall be restricted to the least toxic product and method, and to the maximum extent feasible, shall be biodegradable, derived from natural sources, and used for a limited time. The City will identify non-toxic and earth-friendly management techniques for controlling pests and will conduct public outreach to promote the use of such techniques on property with the City."

Officially, it is the new Malibu LUP Policy 3.18.

All Malibu LCP documents are here

- https://library.qcode.us/lib/malibu_ca/pub/local_coastal_program

The bottom line on Malibu's implementation strategy is two-fold:

1) Consider pesticide applications that endanger the environment as "development" which therefore requires a Coastal Development Permit. What kind of pesticide applications require a permit is up to city policy. For example, pesticide application inside a building, e.g. cockroach traps or termite tenting, does not require a CDP.

2) Create a new Local Implementation Plan (LIP) amendment to submit to the Coastal Commission to straight out ban pesticide applications that harm the environment. This is more straightforward than the CDP requirement, but it could take months or years to get through the Coastal Commission approval process.

This strategy was developed after close examination of the Coastal Act. We would be happy to provide more details when Pacifica is ready.

Currently, the city of Malibu is contacting pesticide service companies and customers, especially commercial shopping centers, informing them of the new rules.

This was sent to me by Poison Free Malibu: Kian and Joel who have worked for years to get this implemented into the LCP.

Please consider adding it to the LCP and let me know what I can do to help.

Thank you very much!

Melinda MacNaughton

cc: to Patty Mayall at Protect our Watersheds,

<http://www.protectourwatershed.org>

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: Stan Zeavin [REDACTED]
Sent: Monday, December 4, 2023 11:48 PM
To: Public Comment
Cc: Oceane.ringuette@coastal.ca.gov; Julia.kippmannorton@coastal.ca.gov
Subject: Document for consideration December 5, 2023

[CAUTION: External Email]

From: Margaret Goodale, Stan Zeavin
1135 Palou Dr
Pacifica

To: Pacifica Council Members via publiccomment@Pacifica.gov
cc: Oceane.ringuette@coastal.ca.gov, Julia.kippmannorton@coastal.ca.gov

Dear Mayor and Council,

This is a terrible document.

The new document presented by staff for public consideration on December 5 entirely FAILS to clearly address the CCC suggested modifications as promised at the November 13, 2023 study session and in fact has NO specific references to CCC modifications in the new “alternative modifications” or “new policy text.” Sadly, this new document introducing the new concept of SRAs (Special Resiliency Areas) reflects the false choice that either we let everything go at Sharp Park or we continue armoring. This plan also seems primarily focused on enabling increased development in an area of severe risk of coastal hazards due to geographic exposure. This implementation plan also postpones indefinitely any discussion of planning to remove shoreline armoring and would violate the Coastal Act.

Language on Packet page 6 makes clear that the City’s intent is to minimize “development obstacles” ... “within those parts of Pacifica that are already densely developed and situated near the shoreline.”

On Packet page 8 is the statement that SRAs allow the City to remove CCC suggested modifications and allow “development to rely on existing shoreline protection devices.” Neither “development” nor “existing shoreline devices” is defined. Is development “new” or “existing”? What does “existing” mean in the context of the current seawall south and retaining wall north of the pier?

SRA's are intended to provide "exceptions from LCLUP policies" but will "mitigate adverse impacts to coastal resources." However, the "highest priority/importance" mitigations are immediately dismissed. **"Maintenance or alteration of existing shoreline protection devices to expand coastal access..."** is offered as a self-contradictory mitigation. NO information is included about another useful potential mitigation: "Acquiring and conserving undeveloped coastal properties within the SRA." Of course only one such possibility exists within the SRA other than the City property formerly the wastewater treatment plant. Offering enhanced public restrooms, bike parking and covered picnic areas in no way mitigates (substitutes for) the loss of the natural resource that is a beach.

On Packet page 9 "Substantial Structural Modifications" is NOT defined. Rather under the title of *"Removal of Development Significantly and Recurrently Damaged by Coastal Hazards"* the first sentence states "A main objective of the SRAs is to enable development in reliance on existing shoreline protection devices."

Packet Page 12

Attachment A – Draft Special Resiliency Area Policies (Alternate Adaptation Strategies)

The document emphasizes that "The purpose of these policies is to allow ongoing economic use...of property... and requires ongoing reliance on existing shoreline protection." The policies do not provide for either adaptation or resilience to sea level rise.

CR-I-X1 allows "Development shall be authorized to proceed in reliance on existing shoreline protection..." if consistent with Policy CX-I-XX which is not defined or discussed. Does this policy affect new, replacement or redevelopment?

Packet Page 13 continues CR-I-X1 and discusses waivers of development standards, stating "There shall be no limit to the number of waivers granted." Without more specific limitations on the use of waivers, they may serve to increase the density in this area of coastal hazards. The idea that reduced setbacks, increased building height, the elimination of off-street parking or vehicle access to a public right-of-way would somehow "advance efforts to remove shoreline protection devices" is ludicrous.

Packet page 14

Development is not defined. Is this new, redevelopment or replacement?

CR-I-X3 Substantial Structural Modification is not defined.

CR-I-X3 Coastal Hazards Induced Damages places the burden of appraisal on the owner, "shall be based" on the value of the property prior to damage and may require removal by the owner.

According to the last sentence of CR-I-X3, "The provisions of this policy shall not apply to restoration of shoreline protective devices consistent with their permitted design." Therefore any shoreline protective device whether seawall, retaining wall or revetment may be maintained altered or restored despite recurrent damage that otherwise could require its removal.

CR-I-X4 notes that funding sources may include fees and assessments which can be approved by Council and imposed without a public vote.

Packet page 15 presents CR-I-X6 which introduces the new title “Neighborhood Exemption Policies” which is simply a friendlier name for Special Resiliency Area policies. CR-I-X5 is referred to but omitted from the document.

Please, Council, consider your duty to the wider Pacifica population and the citizens of the State. Reject this plan which violates the Coastal Act and jeopardizes grant funding. Instruct staff to begin to plan in accordance with the regulatory statutes of the Coastal Act.

Thank you for your consideration,

Margaret Goodale
Stan Zeavin

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: James Kremer [REDACTED]
Sent: Tuesday, December 5, 2023 8:47 AM
To: Public Comment; _City Council
Cc: Murdock, Christian; Woodhouse, Kevin; CCC Coastal Commission
Subject: Public Comment, Dec 5 LCLUP Study Session

[CAUTION: External Email]

Comments prior to Dec. 5 Special Study Session on LCLUP James Kremer, Sharp Park

While I hope tonight's meeting will be productive, I want to register my objection to the process that has lead us here. I have tried in good faith to stay informed and track the progress toward a legally compliant LCLUP.

PREAMBLE:

CCC Staff of course has not accepted anything yet, and the City continues to collaborate hopefully with a new spirit of meaningful compromise. Indeed, as we deliberate the big new SRA idea, we have no real idea whether parts which seem clearly to violate years of legal precedent and stated CCC regulatory guidelines will be ultimately allowed.

Here I remain confused: IF the SRA compromise means that Pacifica can continue to benefit from the existing armor to buy time but NOT be allowed to expend precious time and vast sums of money on new constructions, then these acceptable policy compromises may be justified. IF, however, the City continues to propose replacing it with a new larger seawall, and hopes SRA language will allow this, we should reject this. Years of policy, supported by consistent statewide public support and accumulating ever-more-compelling science is clear – both on the likely risk of sea level rise and climate hazards, and the ineffective short-term nature of coastal armor on the public trust lands protected by the CCA and the CCC.

BACKGROUND/DISCUSSION:

I begin with my summary of the unfolding process to which the public (and indeed our hard-working Council as well) has been subjected –

The City released a tabular summary of Suggested Modifications offered by CCC Staff (CCCS) to the City in March '23 for a revision of the submitted draft that might be acceptable for certification by the Commission. The Council meeting that promised to discuss these Mods focused on the 80% City Planning Staff felt were acceptable. They delayed our attention to the ones highlighted in green that were felt to need more careful consideration as they conflicted with development plans for the city. Indeed, the 80% were more or less approved by Council, despite concerns that many of these "acceptable" Mods seemed quite problematical as well. No matter.

At the next Council meeting specifically to elucidate the Greenies – not to discuss their acceptability or implications – City Staff presented a new Summary Table, reorganizing the items in to "helpful groups" but changing the Brief Summary descriptions. Council was perplexed but struggled through, and their confusion was OK for now because the Next Meeting (this one, Dec 5) would encourage public input on these Greenies and Council would observe all this.

Days before this meeting, City release as a bombshell in a normal agenda. Never mind that most attendees may well be unaware of the total change in the purpose of the Public Meeting!? Instead of finally beginning to discuss the most substantive CCCS Suggested Modifications, we are informed that the City, by an admirable recent redoubled communications effort with CCCS, has created a novel totally new approach. This new idea carves out two critical districts as SRAs for which special regulatory policies are proposed, so that the actual LCLUP can be more readily considered and perhaps approved that will apply to the rest of the City. Now, the focus of the Dec 5 public meeting will present for the first time these big new ideas. Planning Staff hopes the citizens will be prepared to respond after almost no prior notice and a presentation by Staff alone, at this meeting.

The format of the meeting is a dinner and table-breakout groups with minders to take notes and summarize our comments. Many citizens and even Council member cautioned against this format as inadequate, even counterproductive. Council is encourage to watch however, as they will get their chance later.

After learning by chance that this big change was afoot, I spent a large part of my weekend studying the Background summary in the Agenda and the SRA policy draft. I remain confused at best, and at times angry at the dramatic changes being suggested with wording that seems clear but is actually vague.

SOME PERSONAL REACTIONS:

- Are we expected to believe that City did not know that the SRA change was upcoming when the city was informed of the plan for this meeting? Yet we were led down the path they knew would be changed dramatically? How could Staff actually allow this major policy idea be introduced and moved forward in this fashion?
- Most citizens presumably have no idea this is being dropped, and those who do must grapple with major policy proposals that overtly run counter to much of what we know about the coastal regulatory environment, the CA Coastal Act, and prevailing science of coastal planning.
- The format of the meeting is unacceptable for such a rollout. We are asked to react and comment thoughtfully on new major policies with insufficient context and without hearing any discussion of the pros, cons, rationale and implications to clarify troubling ambiguities. Our “input” will be curated by staff as they choose – most points of view cannot possibly be included – and notes will be taken but not plausibly be assimilated meaningfully into the debate; most voices will not be heard But thanks for dinner.
- SRA policy for two areas (but more may be added) is to stand aside from the main LCLUP. How can the main LCLUP be completed if these most controversial carve-outs are not included? And IF the total approve of an LCLUP will await completing of the SRA policies, how does this expedite approval, if it does?
- Wording “maintenance or alteration of existing shoreline protection devices” is fundamental to the core implications of SRAs. But ALTERATION is vague, in the eye of the advocate meaning either minor changes or allowing total replacement with a new SPD. Similarly, we all know what EXISTING means. But the context here is NOT common sense. As a legal term, it is presently under litigation in coastal law and development advocates hope it will come to mean something more helpful to their goals. SO, the meaning of this critical phrase evaporates into the mist.
- IF “existing” and “alteration” mean what they commonly mean, SRA policy allows Sharp Park and Rockaway hard armoring to remain and be maintained, but a new massive wall which is the dream of some in the city under BBIRP would not be allowed. Noone believes that this City Staff and present Council finds this acceptable. And the fraught word “existing” looms up repeatedly in the SRA proposal.
- As mitigation for allowing the existing SPD to just remain, “existing” development is to be allowed but only under restrictions. But the City’s Introduction justifying the concept of SPDs predicates “...neighborhoods that under all plausible scenarios will remain largely in their current forms for the foreseeable future” Yet development will occur “within those parts of Pacifica that are already developed and situated near the shoreline.” For me, this is additional confusion in concept and wording.
- Modification to “existing development” will require correction of “nonconformities with respect to coastal law. Yet some of these seem draconian and legally questionable.

Repeating my preamble: CCCS of course has not accepted anything yet, and the City continues to collaborate hopefully with a new spirit of meaningful compromise. Indeed, as we deliberate the big new SRA idea, we have no real idea whether parts which seem clearly to violate years of legal precedent and stated CCC regulatory guidelines will be ultimately allowed.

Here I remain confused: IF the SRA compromise means that Pacifica can continue to benefit from the existing armor to buy time but not be allowed to expend precious time and vast sums of money on new constructions, then these acceptable policy compromises may be justified. IF, however, the City continues to propose replacing it with a new larger seawall, and hopes SRA language will allow this, we should reject this. Years of policy, supported by consistent statewide public support and accumulating ever-more-compelling science is clear – both on the likely risk of sea level

rise and climate hazards, and the ineffective short-term nature of coastal armor on the public trust lands protected by the CCA and the CCC.

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: Sue Digre [REDACTED]
Sent: Tuesday, December 5, 2023 11:08 AM
To: Public Comment
Subject: Dec. 05 2023 Study session LCLUP

[CAUTION: External Email]

Study Session LCLUP Dec 5 2023.

The Coastal Act was created by the voters of the State Of California to protect the ocean and the the right and opportunity of all members of the Public to have access to the ocean & shore. That act also assured that the neighborhood housing opportunities would be equitable too. Some Electeds in 1983 somehow quietly took out that mission focus.

The Coastal Act should not be violated by anyone.

The Voters of Electeds and Appointeds of today will be more attentive and informed. The Coastal Act and Local Coastal Plans should not defy the reason for their existence . The mission intended by the Votes of the People in the State wide election.

Thank you.
Sue Digre

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.