

Public Comments
Item 1 – Draft Local Coastal Land
Use Plan (LCLUP)

Written Comments Received By 12pm on 03/01/2024



March 2, 2024

Study Session

From: Richard Harris [REDACTED]
Sent: Friday, February 16, 2024 4:30 PM
To: _City Council; Public Comment; Coffey, Sarah; Pacifica Permit Tech; City Manager; CoastalPlan
Cc: Vaterlaus, Sue; Bigstyk, Tygarjas; Beckmeyer, Sue; Bier, Mary; Boles, Christine; Murdock, Christian; 'Phil Ginsburg'; 'Potter, Spencer (REC)'; Cervantes, Stefanie; Woodhouse, Kevin
Subject: Pacifica Joint City Council and Planning Commission Mtg., LCP Study Session #3, Mar. 2, 2024 / Questions submitted by San Francisco Public Golf Alliance

[CAUTION: External Email]

City Clerk Sarah Coffey – Please forward to City Council and Planning Commissioners and Planning Department

**Mayor Sue Vaterlaus, Pacifica City Council and
Pacifica Planning Department**

**Dear Mayor Vaterlaus, Councilmembers, Planning Commissioners, and Planning Department Staff
See questions submitted by San Francisco Public Golf Alliance, below.**

Question #1.

At page 164 of Exhibit 2 (<https://documents.coastal.ca.gov/reports/2023/3/W14a/W14a-3-2023-exhibits.pdf>) to its Summary of Staff Recommendations dated Feb. 24, 2023 (<https://documents.coastal.ca.gov/reports/2023/3/W14a/W14a-3-2023-report.pdf>) for modifications to Pacifica's Draft Local Coastal Plan, Coastal Commission staff recommends that the following text be stricken from Pacifica's Draft Local Coastal Plan:

Page 164:

- “The cost-benefit analysis section of the Adaptation Plan was not adopted or approved by the City of Pacifica. The purpose of the costbenefit analysis was to provide information regarding various sea level rise scenarios and adaptation options and was not intended to prescribe specific adaptation policies. The cost-benefit analysis shall not be used for any future purpose by the City of Pacifica or its planning processes, including implementation of the Local Coastal Program, public infrastructure investment, permitting or other regulatory purposes.”

Question #1: Has the Coastal Commission or Coastal Commission Staff given to Pacifica or any of its staff – orally or in writing or by e-mail or any other means –any reasons or rationales for Staff's recommended edit? If so, what are the reasons given? If in any form of writing, including but not limited letter, text message or e-mail, can you please provide a copy of that writing?

Question #2.

At page 166 of Exhibit 2 (<https://documents.coastal.ca.gov/reports/2023/3/W14a/W14a-3-2023-exhibits.pdf>) to its Summary of Staff Recommendations dated Feb. 24, 2023 (<https://documents.coastal.ca.gov/reports/2023/3/W14a/W14a-3-2023-report.pdf>) for modifications to Pacifica's

Draft Local Coastal Plan, Coastal Commission staff recommends that the following text be stricken from Pacifica's Draft Local Coastal Plan:

Page 166:

- Therefore, changes to the cost-benefit analysis in a manner to discourage managed retreat as suggested by some public commenters detailed below would be unnecessary since the Coastal Resilience policies do not include managed retreat as an adaptation strategy. As noted earlier in this section, the cost-benefit analysis prepared for the Adaptation Plan shall not be used for any future purpose by the City of Pacifica or its planning processes.

Question #2: Has the Coastal Commission or Coastal Commission Staff given to Pacifica or any of its staff – orally or in writing or by e-mail or any other means –any reasons or rationales for Staff's recommended edit? If so, what are the reasons given? If in any form of writing, including but not limited letter, text message or e-mail, can you please provide a copy of that writing?

Richard Harris

San Francisco Public Golf Alliance

826 Stanyan Street

San Francisco, CA 94117-2726

Phone: (415) 290-5718

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: mark stechbart [REDACTED]
Sent: Friday, February 16, 2024 9:23 PM
To: Public Comment; Coffey, Sarah; _City Council
Subject: mar 2 LCLUP questions

Importance: High

[CAUTION: External Email]

Summary: Need city answers and responses to be focused on the effect of CCC regulations and imposed costs on homeowners.

Unintended consequences of CCC demands will ruin this town if implemented. Council is not capable of “fixing” the various CCC documents. Council has not come close to evaluating the 50 page Dec 5 CCC demand/amendment document. Any council attempt to “fix” all unacceptable items will leave something overlooked. Reject out of hand CCC over-reach on SSMs, 50% conformity.

Resubmit Feb 2020 LCP and stop wasting everyone’s time on escalating and intolerable CCC demands.

1. The question of roof repair, replacement, SSMs and the 50% rule. See also SSM under FAQ Q1, city website where one can submit a question.

A) Need city response: This entire issue is nonsense, CCC over-reach and must be deleted. Roof repair and replacement is approved for everyone in town, without the mind numbing amount of words contained in Q1.

B) Need city response: SSM regulations and 50% should be deleted in their entirety. The City has a planning and building dept; get the CCC out of the remodel and repair business for all coastal zone buildings. It’s a local control city council matter.

On point is the situation below, from 2021, regarding the mobile home park at 1300 Palmetto.

C) Need city response: CCC required inspection and obvious control over roof, exterior and interior modifications. **CCC used numerous years’ worth of surveillance photos.** The city FAQ Q1 roofing language offers up conditioning language, softens the scope of regulation and professes CCC reasonableness. How do FAQ Q1 words square with CCC behavior below vs the mobile home park that is the exact opposite?

D) Need city response: does the city have any knowledge of continued CCC use of aerial or street surveillance to monitor appearance of coastal zone structures in order to stop SSM, remodel, etc??

E) Need city response: does the city possess broad-based aerial or street photos of Pacifica structures?

CCC link:

chrome-

extension://efaidnbmnnnibpcajpcgclefindmkaj/https://documents.coastal.ca.gov/reports/2022/11/F14a/F14a-11-2022-exhibits.pdf

VIEWPOINTE AT SEASIDE MOBILE HOME PARK 1300 PALMETTO AVENUE, CITY OF PACIFICA (prior aka Pacifica Skies)

CCC file: page 8 of file..

F14a 3-83-172-A9 (Viewpointe Armoring) November 18, 2022

March 17, 2021

Michael Osborne U.S. Real Estate The Carlyle Group 555 Mission Street, Suite 3300 San Francisco, CA 94105

Dear Mr. Osborne:

At your request, I have inspected the mobile home units at The Cottages at Seaside (the "Park") in order to respond to questions from California Coastal Commission staff regarding whether there were any structural alterations to these units. I inspected the exterior of all the units Coastal Commission staff identified and the interiors of some of those units.

I found no evidence of alterations to any of the structural elements of the roofs or exterior walls in any of the units, with the exception of one minor alteration at 622 Sixth Avenue. These elements all appear to be original as furnished by the manufacturer, and the apparent age of the roofing and exterior wall structural elements is consistent with other structural components of the units.

As part of normal maintenance and upkeep, some units have had roof coatings applied or shingles replaced, and some units have had sections of non-structural exterior siding or windows replaced. None of this work involved any changes to the roof or wall structural elements.

A full summary of my findings is set forth below.

1. Scope of Work I have been provided with a document entitled "Pacific Skies draft" (attached as Exhibit 1), which I understand was prepared by Coastal Commission staff. The document consists of three overhead aerial photographs, three oblique aerial images, and four street level photographs.

Overlaid on the three overhead aerial photographs (dated 1986, 1993, and 2018), Coastal Commission staff has circled 13 units previously identified as having been replaced (circled in green), 15 units where the roof appears to be a different color in the 1993 aerial photograph than appears in the 1986 aerial photograph (circled in red), and 31 units where the color of the roof appears to be a different color in the 2018 aerial photograph than appears in the 1993 aerial photograph (circled in yellow).

I understand that Coastal Commission staff has asked whether the roofs on the units circled in red and yellow have been replaced. The three oblique images (dated 2002, 2013, and 2018) depict certain units located in the northern portion of the Park that have been overlaid with the same circles as appear in the aerial photographs. Generally, these images show the western-facing side of units.

I understand that staff has asked whether these images reflect changes to the structural wall elements of the units.

The street level photographs show certain units located along First Avenue and Fifth Avenue. I understand that Coastal Commission staff has inquired whether some of the units depicted in the street level photographs exhibit new construction.

To assess the questions raised by these photographs, I visited the site on December 20, 2019, February 25, 2020, June 17, 2020, and August 11, 2020. During those visits, I inspected the exterior of the units in question and the interior of some of those units. (rest of ltr omitted)

2. SF RV Resort

- A) Will council write the CCC to demand the rock revetment removal order be canceled?
- B) What is Council's plan to defend Palmetto, Hwy 1, the southern storm drain outfall and W Avalon homes? Who pays?
- C) When will city alert 8 homes on W Avalon their homes and backyards will front an erosion hole and erode themselves if unprotected?
- D) What is the property tax loss if the Resort and W Avalon homes are destroyed?
- E) Has NCCWD been notified to plan relocation of their lines? What is relocation cost?
- F) Where will the sewer line be relocated? Far enough east to avoid another move?
- G) What other infrastructure is in the area subject to resort erosion? Cost to move?
- H) If Palmetto and Hwy 1 have to be moved, where would either go? Onto Oceana? What is cost for relocation, condemnation of existing businesses, city office and homes?

3. Twelve Shoreview homes and their privately funded rock revetment.

Shoreview homes seek to re-stack and maintain their revetment. The CCC has requested various studies costing around \$250,000 before the application to maintain is accepted. There is no indication after these huge application costs that the permit would be approved. In fact, there is every suspicion the permit will be denied or laden with unacceptable demands.

The revetment ties into the north end of the current city seawall. Loss of the revetment would allow erosion to move south and get behind and compromise the seawall. Loss of the revetment would allow erosion to move east into the neighborhood, hit more homes and soon Palmetto.

What is the city prepared to do to assist these homeowners? This offer to help is a public benefit identical to the fire dept defending a private home.

4. Infrastructure to be defended or moved

Facilities of concern are but not limited to: Linda Mar beach pump stations, Lighthouse pump station, quarry sewer plant, storm pump station south end golf course, pump station south sharp park, council chambers pump, potential library, IBL school.

- A) How will these facilities be defended?
- B) If moved, where? East of Hwy 1 to avoid frequent moves? What streets and homes/businesses will be impacted or condemned with the relocation? Cost? Timetable?

5. Linda Mar Beach and Hwy 1.

This area has been labeled a managed retreat area with not much thought to where the retreat will take us.

- A) will Hwy 1 be elevated? Cost? Who pays?
- B) Any move east will hit the Linda Mar shopping center, homes along Anza, the community center and Puerto 27. Is this correct? Cost? Who pays?
- C) If Hwy 1 is impacted, what happens to Pedro Pt shopping Center and access on San Pedro Ave?

6. loss of value. What is city position for the cascading and cumulative effect of CCC actions as the coastal zone goes gray and eastside homes take property value hits: Address market reaction to each item: Deed restrictions, loss of insurability, loss of mortgage access, resale value loss, homeowners seek property tax reassessment, city loss of property taxes and programs cut back, city and school bond value diminished, city credit rating downgrade. Eastside homes lose value as buyers recognize mounting costs of Hwy 1, infrastructure threats and the fact that 30% of town with many community amenities is gone.

7. SRA must be abandoned. An artificial structure to try to minimally unwind otherwise excessive CCC regulations in Pacifica. Patently unfair. Throws Fairway, Shoreview neighborhood, everything north ,IBL and Pedro Pt under the bus.

8. Reject right to repair restrictions. (Hazard induced damage) Hijacks city management of acts of nature repair through planning and building departments. I live in earthquake county and have the right of repair. I live 3 miles west of San Andreas with no deed restrictions.

9. Abandon any notion that building behind a protective structure must be done as if the structure is not there. Defies logic. Pacifica will never get an earmark to build a phantom protective structure. You will get laughed out of the hearing room. You will also get a substandard building, its use vastly restricted, probably no lender and no insurance.

mark stechbart



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: Remi Tan [REDACTED]
Sent: Wednesday, February 28, 2024 2:27 PM
To: Public Comment
Cc: _City Council
Subject: Local Coastal Plan update, and sea level update comments

[CAUTION: External Email]

Dear City Council, I'm unable to attend the meeting on the second, but please see my comments below

The City Of Pacifica, the coastal commission, and local property owners affected by sea level of rise, coastal, erosion, and flooding need to come together, and agree on a sustainable plan of action.

Consultants who are familiar with natural solutions, as well as conventional solutions, to these problems should be retained find the most sustainable plan of action that anybody can agree on.

Consultants need to provide realistic costing for agreed-upon solutions.

City should apply for county, state, and federal grant funding and coordinate with solutions.

Remaining cost should be allocated with city paying for measures protecting city infrastructure, and private property owners using Mello Roos bond assessment districts to pay for measures that protect their properties. City taxpayers should not pay for any measures private property.

All solutions shall be coordinated with grant, funding, city funding and private Mello Roos bond funding to make sure that solutions are fully funded and therefore constructible.

Thank you and Best Regards,

Remi Tan, AIA LEED AP BD+C

Architecture, Green Building
Real estate investment and brokerage

[REDACTED]

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.

From: Coffey, Sarah
Sent: Friday, March 1, 2024 8:36 AM
To: Public Comment
Subject: FW: Analysis of City Staff's LCLUP Case Studies - March 2
Attachments: Analysis of City Staff's LCLUP Case Studies.pdf

From: Jeff Guillet [REDACTED]
Sent: Thursday, February 29, 2024 11:56 PM
To: Vaterlaus, Sue <svaterlaus@pacifica.gov>; Beckmeyer, Sue <sbeckmeyer@pacifica.gov>; Bigstyck, Tygarjas <tbigstyck@pacifica.gov>; Bier, Mary <mbier@pacifica.gov>; Boles, Christine <CBoles@pacifica.gov>
Cc: Coffey, Sarah <scoffey@pacifica.gov>; Richard Harris [REDACTED]; SMC_SupMueller@smcgov.org; Save Pacifica <info@savepacifica.org>
Subject: Analysis of City Staff's LCLUP Case Studies - March 2

[CAUTION: External Email]

Dear Mayor and City Councilmembers:

Please read and the following document and add it to the public record for the March 2, 2024, LCLUP Meeting #3. I have spent over two days reading and analyzing city staff's Case Studies that they will present at Saturday's meeting. This analysis should help in understanding the real-world effects that accepting these changes would mean to Pacifica.

I also want to call your attention to the lack of answer to the simple question I posed to city staff. If you can decipher this answer, I'll buy you a drink.

Pacifica's 2020 LCLUP draft protected the SHORELINE from NEW development. CCC staff's changes make those same restrictions apply to EXISTING development in coastal vulnerability areas and tsunami evacuation areas (basically, everything west of Highway 1, according to city maps). What is the legal and legislative authorization to make these demands on Pacifica homeowners?	While the CCC suggested modifications expand the are none of the policies are implemented until developme to new development or substantial structural modifica
---	---

City Council must say "NO" to Coastal Commission staff's modifications and "NO" to the Special Resiliency Area (SRA) compromise. We cannot throw all residents in the city under the bus for this ill-conceived SRA idea.

Thank you,

Jeff Guillet

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.



SavePacifica.org

We are citizens who live and work in Pacifica. We are your neighbors.

Dear Mayor and City Council members:

I prepared this document to provide real-world examples and effects for the [Case Studies](#) that Pacifica city staff will present at the [LCLUP Meeting #3](#) at Terra Nova High School Theater on March 2, 2024.

California Coastal Commission staff rewrote Pacifica's 2020 Local Coastal Land Use Plan (LCLUP) with crippling restrictions on property owners in Pacifica's coastal zones (any property west of Highway 1) and even into Linda Mar, as far as Peralta Road.

This document lists the coastal restrictions that apply to most of the coastal zones. City staff wants City Council to accept these restrictions as a "negotiation" with the Coastal Commission. We can do much better by telling Coastal Commission staff, "**NO**" and to accept our 2020 LCLUP.

City staff is proposing to create new "**Special Resiliency Areas**" (SRAs) in West Sharp Park and Rockaway Beach that will allow the kinds of development most everyone on the coast currently enjoys. SRAs are allowed to acknowledge that the sea wall and other revetments actually exist. As crazy as it sounds, the vast majority of residents and businesses in the rest of the coastal zone would have to plan as if shoreline protections **do not exist**, even though they do. [Section 30235 of the Coastal Act](#) already **allows shoreline protections for existing homes, we don't need to give that up.**

This has an enormous impact on our city, no matter where you live in it. Most of Pacifica's critical infrastructure lies within the coastal zone. If you drink water or use the toilet, this affects you directly. The cost to everyone is astronomical. Where would this infrastructure be moved to? How much will it cost? This doesn't even include the enormous number of lawsuits the city will face.

This document does not cover the restrictions that apply to the city's SRAs. Read this document to understand what everyone else is expected to give up for this "compromise" with the Coastal Commission. This is not acceptable. **City Council must say "NO" to the Coastal Commission modifications and "NO" to the SRA compromise.** We cannot throw all residents in the city under the bus for this SRA idea.

Jeff Guillet

West Fairway Park

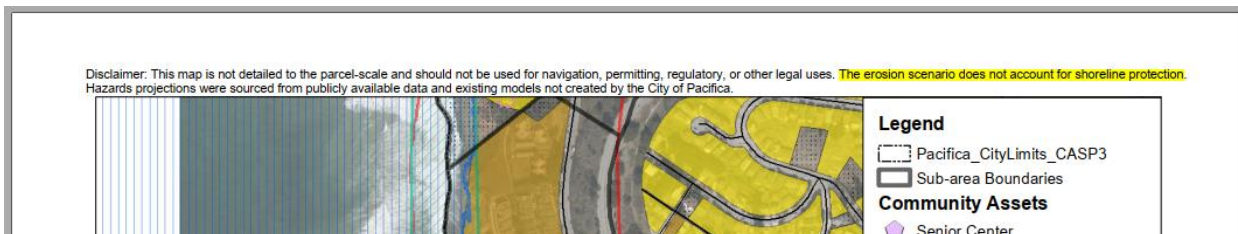


Analysis of City Staff’s Case Studies (Attachment B) for Coastal Commission’s Modifications of the LCLUP

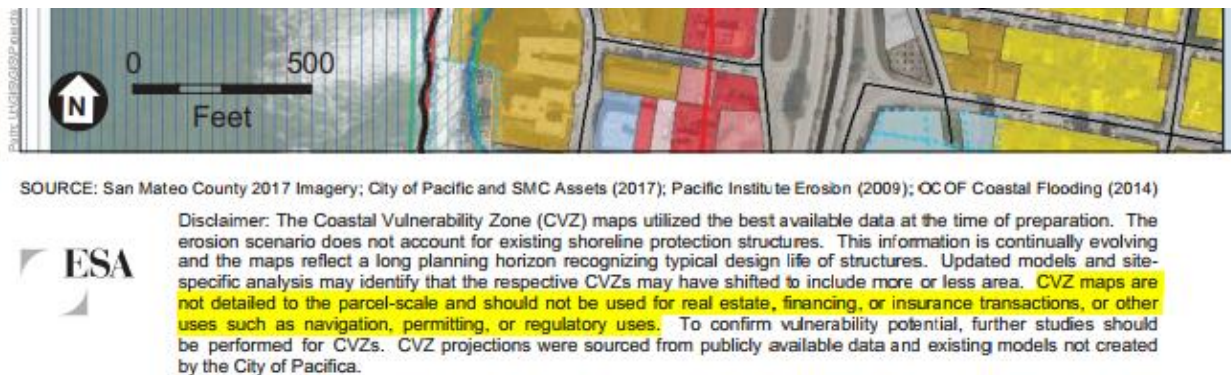
Important Considerations

Both the California Coastal Commission and city staff must stop using ESA’s Coastal Vulnerability Zone (Coastal Vulnerability Zone) maps for policy making.

First, the Coastal Vulnerability Zone maps used in the case studies are not to be used for permitting or regulatory policies because the erosion scenarios do not account for existing shoreline protection. Here is an example taken from the original Coastal Vulnerability Zone maps from 2018. This disclaimer was later omitted for unknown reasons:



Because of these and other errors, Pacifica’s city attorney added the following disclaimer to all Coastal Vulnerability Zone maps in the 2020 LCLUP due to their inaccuracies:



Second, the Coastal Vulnerability Zone maps are not using “best available science” and need to be redrawn. ESA used Ocean Protection Council’s [State of California Sea Level Rise Guidance 2018 Update](#), that predicted a 0.5% chance of **5.7’** of sea level rise by 2100. It also included an H++ scenario of 10’ of sea level rise.

OPC’s new [State of California Sea Level Rise Guidance: 2024 Science and Policy Update](#) revised its 0.5% chance predictions downward to **3.1’** of sea level rise by 2100, a **54% reduction**. The H++ scenario was removed entirely because it was deemed much higher than available science suggests.

Throughout the case studies, an assumption is made that almost all building permits in Pacifica are appealed to the Coastal Commission. This is simply not true.

Case Study #1: Basic Residential Maintenance (reroof, new windows, new siding, non-structural)

New requirements:

- Must be like-for-like. Like-for-like means that the replacement is similar in materials and colors. Like-for-like does not include changes in design, structural characteristics, or function.
- If you convert from a tar and gravel roof to shingles, change the shape of the roof, add skylights, add solar, etc. it counts towards your cumulative changes total, which the city and Coastal Commission track.
- If the replacement requires structural maintenance, such as repairing or replacing roof trusses or framing (as it often does for a roof replacement) it also counts towards your cumulative changes total, which the city and Coastal Commission track.
- When your modifications to your home reach 50% or more over time, it triggers a “Substantial Structural Modification” (SSM), and your home is considered a new development. See Case Study #3 to understand what that entails.

Case Study #2: Residential Addition (non-Substantial Structural Modification)

Examples: Adding an addition that is less than 50% of existing flooring area, most **interior** remodels (i.e., remodeling the kitchen or bathrooms), upgrading electrical or plumbing, most solar projects, replacing a furnace or adding a heat pump.

Note that any change that cumulatively exceeds 50% over time is considered an “Substantial Structural Modification” (SSM) and is covered in Case Study #3. For example, say you remodeled your kitchen and two bathrooms 10 years ago and that’s 40% of the square footage of your house. You decide to add solar panels, which cover 15% of your roof. That’s cumulatively 55% of the square footage, which triggers a Substantial Structural Modification (SSM). Now you’re in Case Study #3, not Case Study #2.

Also note that this 50% threshold applies to the house, not the owner. If you make improvements of 45% of your house and sell it, the new owner can only improve 5% before triggering an SSM. You will need to disclose this to the buyer, so watch housing values drop.

New Coastal Vulnerability Zone requirements:

- Expensive technical reports demonstrating the project avoids coastal hazards through its lifetime without the need for shoreline protections. Required before application for Coastal Development Permit is submitted – does not mean the Coastal Development Permit will be approved.
- Design must be safe from coastal hazards for at least 100 years without the need for shoreline protections.
- Must record a deed restriction to hold the city harmless, waive all rights to future shoreline protections, assume all responsibility for future damage, remove the development if the city or Coastal Commission says so.

Case Study #3: Residential Addition (Substantial Structural Modification)/New

Examples: Replacement due to natural disaster (fire, earthquake, fallen tree, etc.), adding a second floor, adding an Accessory Dwelling Unit (ADU), any development that exceeds the 50% cumulative threshold that the city and the Coastal Commission keep track of.

New Coastal Vulnerability Zone requirements:

- Must record deed restriction to hold the city harmless, waive all rights to future shoreline protections, assume all responsibility for future damage, remove the development if the city or CCC says so.
- Expensive technical reports demonstrating the project avoids coastal hazards through its lifetime without the need for shoreline protections. Required before application for Coastal Development Permit is submitted - does not mean it will be approved.
- If technical reports demonstrate that existing portions of a home are not designed to be safe from coastal hazards for at least 100 years without shoreline protections, the nonconformities must be "corrected".
- Must design as if existing shoreline protections do not exist, regardless of whether they exist or not.
- Requires a Coastal Development Permit before applying for building permit. Allows CCC to require design modifications (reduction in project scope or denial).
- Design must be safe from coastal hazards for at least 100 years without the need for shoreline protections.
- Entire development will need to correct existing legal nonconformities, as if it is new construction. Any use of the structure that is inconsistent with the LCP must cease.
- The development would not be allowed to subdivide existing parcels unless the new parcels are intended for conservation of land.

New non-Coastal Vulnerability Zone requirements:

- If the development is in a tsunami evacuation area (~90% of the developed coastal zone), all the above applies.
- The development would not be allowed to subdivide existing parcels if it contains or abuts an ESHA (potentially ~90% of the developed coastal zone)

Case Study #4: Development on a Parcel with No Sensitive Environmental Resources

- **Includes all tsunami evacuation areas**, which encompass almost the entire coastal zones. Tsunamis have nothing to do with climate change or sea level rise.
- Same examples and Coastal Vulnerability Zone/Non-Coastal Vulnerability Zone requirements as Case Studies #2 and #3

Case Study #5: Development on a Parcel with or adjacent to Sensitive Environmental Resources (habitat, animal species, creeks, etc)

Examples: Sensitive Environmental Resources = Environmentally Sensitive Habitat Areas (ESHA); Homes next to an ESHA, such as creeks, wetlands, Mori Point, etc.

Requirements:

- **These rules apply to all homes in tsunami evacuation areas**, which encompass almost all coastal zones. **This has nothing to do with climate change or sea level rise.**
- California requires that three criteria are met for an area to be declared as an Environmentally Sensitive Habitat Area (ESHA), however the Coastal Commission says they only need to meet one. This means that a vast amount of coastal land will now be declared ESHA.
- A property owner will need to evaluate the presence of sensitive environmental resources on the site or within 300' of the property.
- Requires expensive technical reports and a biological assessment.

New Coastal Vulnerability Zone requirements:

- Biological reports must be created to identify ways to avoid and/or mitigate impacts.
- The development would not be allowed to subdivide existing parcels unless the new parcels are intended for conservation of land.

New requirements for All Coastal Zones:

- Prohibits development on coastal dunes. This would prohibit closing the Clarendon gap and is designed to short-circuit the Beach Boulevard Infrastructure Resiliency Project (sea wall replacement).
- Requires a Coastal Development Permit before applying for building permit. Allows Coastal Commission to require design modifications (reduction in project scope or project denial).
- 100' non-developable buffer zones around ESHA.
- Development is prohibited within 50' of ESHA.
- If development occurs more than 50' from ESHA and triggers an SSM (entire structure is new development), the property must become legally conformant or removed.

Case Study #6: New/Replacement Shoreline Protection Structures (including seawalls)

Examples: Sharp Park seawall, Sharp Park Golf Course berm, revetments around RV park on Palmetto, revetments around Rockaway beach, etc.

New requirements for all coastal zones:

- Shoreline protections shall be avoided.

- Existing shoreline protections are allowed if found to be the **least environmentally-damaging alternative**, impacts to beach, public access and recreation, and other coastal resources are fully mitigated consistent with policies CR-I-5 and CR-I-59.
- Encourage soft shoreline protections, such as dune and sand restoration.
- New development on bluffs shall comply with all LCP setback policies.
- **Existing shoreline protection structures may be repaired and maintained by no more than 50%.**
- New shoreline protections are only allowed until the structure they protect is an SSM, **then they must be removed.**

Case study #7: New/Replacement of City Infrastructure or Service (pump station, bike lanes, etc)

Examples: Sewer lines, water treatment, water distribution, electrical distribution, roads and streets, pump stations, and other critical infrastructure.

New Coastal Zone Restrictions:

- Require infrastructure to be setback beyond the 100/150-year hazard line indicated on (invalid) Coastal Vulnerability Zone maps. In some cases, this means it must be located on the east side of Highway 1.
- New and upgraded infrastructure will be limited to only support LCP development. Does not account for infrastructure used by the entire city (i.e., sewer). **This Restricts the capacity and location of critical infrastructure in a way that could severely hamper the City's ability to serve the needs of the entire Pacifica community.**
- Adoption of the LCLUP requires expensive new studies to identify and evaluate the condition of critical infrastructure. Studies shall include alternatives analyses for potential retrofit, improvements, relocation, or other considerations. **Everyone in Pacifica will have to pay for these.**

Case Study #8: Residential Rebuild After Substantial Damage (noncoastal hazards, such as fire, earthquake, etc)

Example: House is destroyed or damaged due to fire, earthquake, tree falls, car runs into it, etc.

New Coastal Zone restrictions:

- Coastal Commission staff removed the section that allows a complete rebuild if your home is destroyed by a disaster.
- Almost certainly triggers an SSM (reclassified as new development). All restrictions in Case Study #3 apply.

- Replacement or repair may be required to be smaller to reduce the risk of hazards. Potentially, replacement may not be allowed or may be much smaller.

Case Study #9: Residential Rebuild After Substantial Damage (repetitive coastal hazard damage, including tsunami)

Example: House is destroyed or damaged due to repetitive coastal damage or by a tsunami.

New Coastal Zone restrictions:

- Coastal Commission staff removed the section that allows a complete rebuild if your home is destroyed by a disaster.
- Almost certainly triggers an SSM (reclassified as new development). All restrictions in Case Study #3 apply.
- Replacement or repair may be required to be smaller to reduce the risk of hazards. Potentially, replacement may not be allowed, or be much smaller.