

# **Public Comments**

## **Item 1 – Revised LCLUP**

Written Comments Received After 12pm on 04/15/2024



*April 15, 2024*  
*City Council Meeting*

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**From:** Richard Harris [REDACTED]  
**Sent:** Monday, April 15, 2024 2:37 PM  
**To:** \_City Council; Public Comment; Coffey, Sarah; Pacifica Permit Tech; City Manager; CoastalPlan  
**Cc:** Vaterlaus, Sue; Bigstych, Tygarjas; Beckmeyer, Sue; Bier, Mary; Boles, Christine; Murdock, Christian; 'Phil Ginsburg'; 'Potter, Spencer (REC)'; Cervantes, Stefanie; Woodhouse, Kevin; [REDACTED]; Bob Downing; 'Butch Larroche'; [REDACTED]  
**Subject:** Pacifica City Council Meeting Apr. 15, 2024, LCLUP #4 / Letter of Sharp Park Golf Club  
**Attachments:** Ltr.Sh.Pk.GC.to Pac.Ci.Cil.re.Pacifica.LCLUP.4.11.24.pdf

**[CAUTION: External Email]**

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Pacifica City Council Meeting Apr. 15, 2024, LCLUP#4 / Letter of Sharp Park Golf Club

Pacifica City Clerk Sarah Coffey – Please acknowledge receipt, include in Council's Correspondence file in the Study Session #4 file, and forward to City Council, Planning Commissioners, Planning Department, and Staff

Mayor Sue Vaterlaus, Pacifica City Council and Pacifica Planning Department

Dear Mayor Vaterlaus, Councilmembers, and Planning Department Staff  
The Board of Directors of Sharp Park Golf Club asked me to forward the above-attached letter to Council. And I overlooked until now. Please forgive, all around (members of Board copied).  
Best Regards

**Richard Harris**  
**San Francisco Public Golf Alliance**  
826 Stanyan Street  
San Francisco, CA 94117-2726  
Phone: (415) 290-5718

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**Sharp Park Golf Club  
Sharp Park Clubhouse  
2600 Francisco Blvd.  
Pacifica, CA. 94044**

April 11, 2024

Pacifica City Council  
540 Crespi Dr.  
Pacifica, CA. 94044

**City Council Meeting, April 15, 2024 / Local Coastal LUP Study Session #4  
Please designate Sharp Park - West Fairway Park - Mori Point subarea as  
“Special Resiliency Area” in Final Draft Local Coastal Land Use Plan**

Dear City Council,

The Sharp Park Golf Club is represented by about 200 members who regularly play at Sharp Park Golf course and are interested in the care and maintenance of the course.

We have followed the City of Pacifica’s efforts over several years to update its Local Coastal Land Use Plan. Recently we have read, and we support, the San Francisco Public Golf Alliance’s February 27 and March 25, 2024 letters calling on City Council to designate the Sharp Park (Golf Course) – West Fairway Park – Mori Point vulnerability subarea as “Special Resiliency Area” in the March 2024 Consultation Draft Local Coastal Land Use Plan (LCLUP).

The golf course and Clubhouse and their respective infrastructures are in constant need of repair and maintenance – some of which has long been deferred. The Planning Department explained at Council’s March 2, 2024 LCLUP Study Session that the purpose of the proposed “Special Resiliency Area” policies is to facilitate maintenance and repair of old coastal zone properties – including some work that might not be possible without the “Special Resiliency Area” policies.

So for the sake of proper upkeep and necessary repairs at the beautiful Sharp Park Golf Course and Clubhouse, we ask City Council to include West Fairway Park – Mori Point - Sharp Park within the “Special Vulnerability Area” designation in Pacifica’s Local Coastal Land Use Plan (March 2024 Draft) to be submitted to the Coastal Commission.

Respectfully,

SHARP PARK GOLF CLUB BOARD OF DIRECTORS

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cc: Richard Harris, San Francisco Public Golf Alliance

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**From:** Lawrence Bothen [REDACTED]  
**Sent:** Monday, April 15, 2024 3:34 PM  
**To:** \_City Council; \_City Council  
**Cc:** Public Comment; Public Comment  
**Subject:** Questions for staff at Apr 15 LCP meeting

[CAUTION: External Email]

Council,

Following are questions and comments on LCLUP revisions.

Staff's agenda admits many are confused about the SRA's in Rockaway Beach and West Sharp Park. No wonder. What happens to the rest of Pacifica's coastal zone?

- \* Do SRA's allow for maintenance, improvement or complete rebuilding of coastal protections like the Sharp Park seawall ?
- \* If part of their purpose is to protect existing infrastructure why does it start and stop in West Sharp Park? What about the shoreline next to the Palmetto Av. corridor that carries infrastructure from the Manor? If that's not protected erosion on those bluffs will compromise the Shoreview neighborhood, IBL Middle School and everything up to and including the Manor Shopping Center and the rest of the Esplanade apartments.
- \* Why aren't the Golf Course and West Fairway Park neighborhood included in the SRA's?
- \* Since the Coastal Commission does not have the power of Eminent Domain, where will Pacifica get the money to compensate property owners? Will the State provide that money or is that out of our pocket?
- \* If water and sewer lines, streets and even Hwy 1 have to be relocated, who pays for it? This decision is not being made by the people of Pacifica.
- \* If the LCLUP is approved, what's the timetable for implementation? How does the City plan to replace lost revenue caused by devaluation and loss of taxpaying properties?
- \* Why is Pacifica in such a rush to get this plan approved? Why not let richer coastal cities go first and find out what precedents are set or changes made?

I look forward to honest answers to these questions and more at tonight's meeting.

Larry Bothen  
[REDACTED]

- \* What about the Golf Course?

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**From:** Samuel Casillas [REDACTED]  
**Sent:** Monday, April 15, 2024 4:18 PM  
**To:** Public Comment  
**Subject:** April 15th, 2024 City Council Special Council meeting: Modifications to the City of Pacifica's Revised Certification Draft LCLUP  
**Attachments:** LCLUP city council CEQA fatal flaws comments casillas 4 15 24.docx

**[CAUTION: External Email]**

Hello,  
Please see the attached comments for tonight's LCLUP meeting.

Thank you,  
Sam Casillas

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

Date: April 15, 2024

Subject: April 15<sup>th</sup>, 2024 City Council Special Council meeting: Modifications to the City of Pacifica's Revised Certification Draft Local Coastal Land Use Plan (LCLUP), including the Special Resiliency Area policies, and direction to staff regarding transmittal of alternative modifications to the California Coastal Commission (CCC).

Dear City Council:

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

Pacifica's proposed LCLUP is in violation of:

- Coastal Act (CA) Section 30240(a): ESHA must be protected against any significant disruption of habitat values, and only uses dependent on such resources shall be allowed. The city has not fully mapped all ESHA in the CZ and has data in one specific area known as the "undeveloped San Pedro Avenue Site" from the Coastal Commission biologist (exhibit B) showing adjacent ESHA with a protected species (The California Red Leg Frog). By not acknowledging this ESHA what other ESHA sites has the city ignored? The city is also required to standardize ESHA buffer zones.
- CA (Sections 30121, 30230, 30231 and 30233) and California Code of Regulations section 13577 require wetland sites to be identified, designated AND restored as wetlands based on the latest available data including ground water data (see exhibit C).
- CEQA Guidelines, Section 15125(a)(3) explicitly prohibits use of future plans and permits as the baseline and the two preceding sections (a) (2) and (a) 1 clarify the correct baseline conditions should describe physical environmental conditions as they exist at the time the notice of preparation is published. There are at least three violations of this guideline where re-zoning and updated Land Use Designations have not considered "baseline conditions". These identified parcels in the CZ are the sites known as the Rockaway Quarry where Planned Development is being considered, Aramai Point where commercial is being considered and the San Pedro site where residential is being considered. The city ignored flooding and groundwater data on all three sites but especially the flooding data in the San Pedro Ave site (see exhibit A and C). With the city in violation of this CEQA guideline in these three sites then where else has the city violated CEQA section 15125?
- The city is also required under SB379 to utilize/restore identified appropriate sites to employ as nature-based solutions for climate resiliency, yet the city is again deferring the selection of SB379 sites without explanation. The San Pedro and Quarry sites should be recorded as SB379 sites.

The violations to the Coastal Act, CEQA and California Code of Regulations renders the whole of the LCLUP and potentially the whole 2040 GP fatally flawed and would require a new EIR and considerable revisions to both the LCLUP and the required alignment with the 2040 GP.

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

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

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

Due to the violation of this CEQA guideline the current DRAFT LUD/LCLUP is in violation of CEQA. The city is aware that it should be using existing conditions to determine the new LUDs, which would heavily favor Conservation. Section 15125 backs this view and "ensuring all biological constraints are considered" is not adequately addressed as existing conditions in the Quarry, Aramai Point and the Pedro Point site would dictate otherwise and this potentially applies to the whole of the 2040 GP and its associated FEIR. Additionally, as policy the city's GP/LCP/EIR erroneously allows a deferred analysis as "site-specific as part of proposed development review" for hazards and biological studies to be done at the time a project is proposed. The city has chosen to defer biologic and hazard analysis as policy throughout the LCLUP and the 2040 GP which potentially invalidates the whole of the 2040 GP update

where the city has chosen to change LUD/zoning from the 1980 GP/LCLUP. The city is advised that this policy is in violation of CEQA and may end up invalidating the whole 2040 GPU. By changing LUDs without proper CEQA/CA review the city is also purposely setting itself up for a “taking” of private land and would therefore violate its fiduciary duty to protect the city from potential liability.

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

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

Regards,

Samuel Casillas

Board member, PPCA

Past Vice-Chair, Pacifica Economic Development Committee

Past Member, Pacifica Sea Level Rise Adaptation Planning Committee

Past Co-Chair GGNRA Board Liaison Committee

Past Member, Pacifica GPU Community Outreach Committee



**Exhibit A**



Pedro Point Field flooding Oct 24<sup>th</sup>, 2021

## Exhibit B

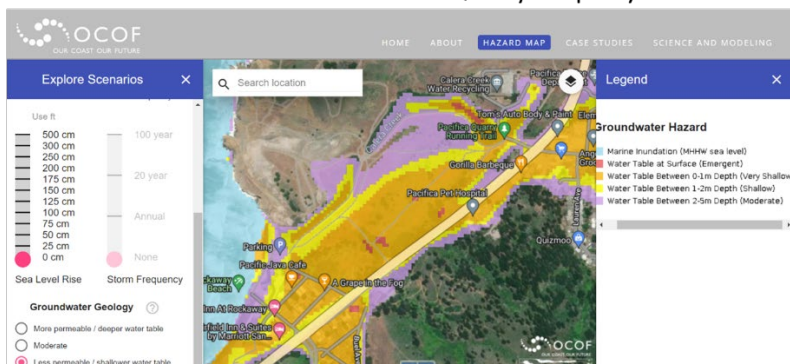
CCC Biologist Findings from its denial of an adjacent property at 505 San Pedro Ave (CDP application 2-19-0026 hearing on 3/12/21)



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

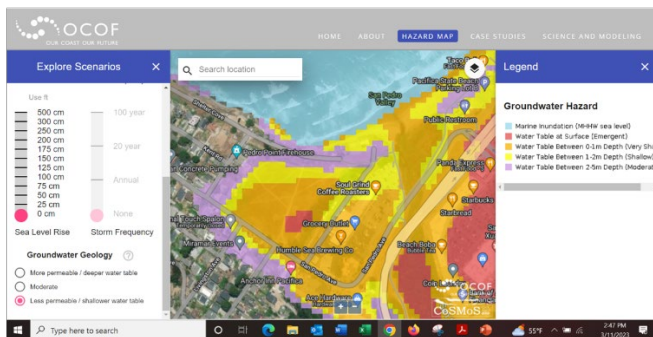
## Exhibit C

### 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

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**From:** John Peterson [REDACTED]  
**Sent:** Monday, April 15, 2024 5:41 PM  
**To:** Public Comment  
**Subject:** Carson Field / Comment on Pacifica Local Coastal Plan

**[CAUTION: External Email]**

Hello,

I live on [REDACTED] since 2003 and have seen the field fill up with water as I've seen in old photos of this area. And, with sea level rise a real issue I am concerned that this projected change in zoning with multiple house and businesses will have issues with flooding. And, of course there's the old creek that has run through here and has obviously been altered to drain into the real local creek, San Pedro. Seems like an ecologically sensitive area that should not be disturbed too much.

The big questions are...how many mixed use buildings? How to handle the traffic in and out of the Point?

I realize that the landowner of the property has rights, but how can they make it all work to the betterment of the existing and future homeowners and businesses?

Thanks,

John Peterson  
[REDACTED]  
[REDACTED]

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**From:** Potter, Spencer (REC) <spencer.potter@sfgov.org>  
**Sent:** Monday, April 15, 2024 10:47 PM  
**To:** \_City Council; Public Comment; Vaterlaus, Sue; Bigstych, Tygarjas; Beckmeyer, Sue; Bier, Mary; Boles, Christine  
**Cc:** Murdock, Christian; Cervantes, Stefanie; Woodhouse, Kevin; Coffey, Sarah; \_City Council; Public Comment  
**Subject:** Public comment clarification

**[CAUTION: External Email]**

Dear Pacifica City Council Members,

I'd like to clarify for the record that the oral public comment I made tonight during the April 15, 2024, City Council Meeting were made in my individual capacity rather than as an official statement from the San Francisco Recreation and Parks Department. The specific comments I made were not approved ahead of time by SFRPD's General Manager or by the San Francisco Recreation and Parks Commission.

Thank you,  
Spencer Potter

**Spencer Potter, J.D.** (he, him, his)  
Natural Resources Regulatory Manager

San Francisco Recreation and Parks Department  
811 Stanyan Street | San Francisco, CA | 94117  
[REDACTED] | [spencer.potter@sfgov.org](mailto:spencer.potter@sfgov.org)



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Like us on [Facebook](#)  
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Watch us on [sfRecParkTV](#)  
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**From:** SanMateo Policy Manager <policy@smc.surfrider.org>  
**Sent:** Wednesday, April 17, 2024 12:05 AM  
**To:** Coffey, Sarah; Public Comment  
**Subject:** Surfrider Foundation Comments Regarding Pacifica City Council Item #1 LCLUP Update  
**Attachments:** Surfrider\_Comments\_PacificaLCLUP\_April2024.pdf

**[CAUTION: External Email]**

Hi Sarah,

I hope you are doing well. Surfrider submitted our letter on Sunday, well in advance of the public comment deadline on Monday, however our letter wasn't posted or added to the comments received as of 4/15 and is still not posted with the other public comments. It looks like you weren't copied and it did not include the general publiccomment@ email address. Sorry about that glitch. Would you kindly add our letter to the public record? Please let me know if you need anything else from us to make this happen.

Thank you for all the work that you do!

Best,  
Kimberly

Kimberly Williams  
Policy Lead  
San Mateo County Chapter  
Surfrider Foundation

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

**From:** Laura Walsh <[lwalsh@surfrider.org](mailto:lwalsh@surfrider.org)>  
**Date:** Sun, Apr 14, 2024 at 9:55 PM  
**Subject:** Surfrider Foundation Comments Regarding Pacifica City Council Item #1 LCLUP Update  
**To:** Beckmeyer, Sue <[sbeckmeyer@pacifica.gov](mailto:sbeckmeyer@pacifica.gov)>, Boles, Christine <[cboles@pacifica.gov](mailto:cboles@pacifica.gov)>, <[tbigstyck@pacifica.gov](mailto:tbigstyck@pacifica.gov)>, <[mbier@pacifica.gov](mailto:mbier@pacifica.gov)>, <[svaterlaus@pacifica.gov](mailto:svaterlaus@pacifica.gov)>  
**Cc:** Martinez, Erik@Coastal <[erik.martinez@coastal.ca.gov](mailto:erik.martinez@coastal.ca.gov)>, Huckelbridge, Kate@Coastal <[Kate.Huckelbridge@coastal.ca.gov](mailto:Kate.Huckelbridge@coastal.ca.gov)>, <[cmurdock@pacifica.gov](mailto:cmurdock@pacifica.gov)>, <[scervantes@pacifica.gov](mailto:scervantes@pacifica.gov)>, Julia@Coastal <[julia.koppmannorton@coastal.ca.gov](mailto:julia.koppmannorton@coastal.ca.gov)>, <[oceane.ringuette@coastal.ca.gov](mailto:oceane.ringuette@coastal.ca.gov)>

Hi,

Please see the attached comments regarding Pacifica City Council Agenda April 15, 2024 Item #1 regarding proposed modifications of the City's LCLUP Update. Surfrider looks forward to working with the City on sea level rise planning that protects coastal resources and public access in Pacifica.

Laura Walsh

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Laura Walsh | California Policy Manager | [Surfrider Foundation](#) | she/her/hers  
[REDACTED] | [lwalsh@surfrider.org](mailto:lwalsh@surfrider.org)

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April 14, 2024

To: Pacifica City Council: Mayor Vaterlaus, Mayor Pro Tem Beckmeyer, Councilmember Bier, Councilmember Bigstyk, Councilmember Boles

Cc: Kate Huckelbridge, Executive Director, California Coastal Commission  
Erik Martinez, District Supervisor, North Central Coast District

**Re: City of Pacifica's proposed modifications to the LCLUP**

Dear Mayor Vaterlaus and Councilmembers,

The Surfrider Foundation (Surfrider) is a grassroots nonprofit organization dedicated to the protection and enjoyment of the world's ocean, waves and beaches for all people. Surfrider's San Mateo County Chapter (Chapter) advocates for equitable coastal access and coastal resource protection in Pacifica. We urge the City of Pacifica to modify the proposed Local Coastal Land Use Plan (LCLUP) to be more protective of the coast and equitable public access. Surfrider opposes the Special Resiliency Areas (SRAs) proposed in alternative modification 6.14 of the City's most recent Revised Certification Draft LCLUP , and the numerous policies that facilitate or leverage the SRA concept.

SRAs are not provided for by the Coastal Act, and such a proposal undermines its access and recreational provisions. The approval of SRAs would set dangerous precedent for interpretation of the Coastal Act throughout the state and would lead to long-term armoring and erosion of Pacifica's beaches — which belong to the *public* and must remain enjoyable by the public rather than eroded by further armoring. Proposed mitigation for SRAs has also been grossly insufficient.

We urge the City to also take the opportunity provided for by the LCLUP process to consider where realignment of public facilities is possible and economical for taxpaying residents. The City needs to engage in long-term planning to relocate aging infrastructure along the coast; including aging sewage lines, other utility infrastructure and runoff pipes that protrude from the bluffs and contribute to bluff erosion. Realigning such structures inland will ultimately be cheaper than working to protect them from escalating flood and storm hazards and will help the City to avoid more beach-destroying armoring for such infrastructure.

Surfrider supports an LCLUP update, but not at all costs. An approved LCLUP will allow Pacifica to be eligible for critical sea level rise adaptation funding from the state and can lay out a vision for Pacifica where beaches and coastal access still exist in the next fifty years. An LCLUP update that undermines the Coastal Act however, ie through the approval of SRAs, sets Pacifica down a path of further armoring that destroys our beaches and prioritizes private interests over the public good.

### **Special Resiliency Areas are Unlawful**

The City's new proposed "Special Resiliency Area" (SRA) provisions came as a surprise to the community and did not arise from public input. This policy proposal constitutes a major change since the 2020 submittal of the draft LUP and there has not been adequate opportunity for public comment. The SRA concept ignores a fundamental policy of the California Coastal Act: New development (built after 1976) is not entitled to shoreline armoring.

Armoring makes erosion worse and drowns the beach and waves as seas rise by fixing the back of the beach in place.<sup>1</sup> The negative impacts of hard armoring on the public trust are well documented in state guidance documents such as [Public Trust Guidance Principles and Action Plan](#) adopted by the Coastal Commission in 2022. Due to impacts on public resources, the California Coastal Act prohibits new development built after 1976 from relying on shoreline armoring. Except for the pre-1977 structures explicitly protected by Section 30235, every pertinent Coastal Act policy militates against armoring the coast.

Consider the impacts of a seawall: it reduces, and in most cases eventually will eliminate public access; it similarly constrains and will eventually eliminate most forms of public recreation; it has significant impacts on marine resources; it degrades the scenic and visual qualities of the coastal area; and it causes a permanent alteration of the natural landforms of the area. Given these multiple potential impacts to resources protected by Coastal Act Sections 30210 (Public Access), 30220 (Recreation), 30230 (Sensitive Habitat), and 30251 (Scenic and Visual), it is understandable that the Legislature in section 30253(c) required that new development not require the construction of these harmful protective devices that would actively harm the public trust by eroding and blocking off beaches.

Implementing a blanket seawall approval provision in the proposed LUP undermines the language and spirit of the Coastal Act and unduly burdens the public's rights and resources. The result of SRAs in Pacifica would be to sacrifice public beaches and waves to coastal squeeze. The City's proposed "coastal amenity improvements" as mitigation for the Special Resiliency Areas are also wholly inadequate - we must not sacrifice the existence of our beaches for things like restrooms and signage.

A similar concept was proposed in Santa Cruz County that would have protected private development from coastal hazards at the expense of the public resources without any significant mitigation. The Coastal Act prohibits shoreline armoring except to protect pre-Coastal Act structures that meet certain criteria for erosion risk. The Commission upheld the foundational Coastal Act policies on shoreline armoring by denying the County's plan in a unanimous vote for denial in October 2022.

### **Policies to Facilitate Realignment Should be Included in the LCLUP**

Infrastructure has been successfully realigned off the coast at Big Lagoon in Humboldt County, Isla Vista in Santa Barbara, Depot Hill in Capitola, Surfer's Point in Ventura and at least 13

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<sup>1</sup> Loughney Melius, M., & Caldwell, M. R. (2015). *California Coastal Armoring Report: Managing Coastal Armoring and Climate Change Adaptation in the 21st Century*. Stanford Law School, Environment and Natural Resources Law & Policy Program. <https://www.slc.ca.gov/wp-content/uploads/2018/10/CACoastalArmoringRpt.pdf>



locations in California.<sup>2</sup> Many communities are planning realignment projects including Ocean Beach, San Francisco (realignment of the Great Highway Extension), Del Mar (train tracks), Carlsbad Boulevard, Highway 1 in Pescadero and more.

Realignment of infrastructure is a logical opportunity to save costs and public resources in the face of increasing storm frequency, flooding and sea level rise. Maintaining infrastructure in place that is inundated by sea level rise is going to grow increasingly expensive and will result in more erosion-causing seawalls, whereas preserving recreational space will drive the local economy and contribute to better quality of life for the vast majority of residents and visitors to the community. In the 2016 El Niño, the City of Pacifica spent \$16 million in emergency response to flooding and had to declare a state of emergency and order an evacuation. Already, the City has become a cautionary story of what happens when armoring is the primary solution to the impacts of climate change and sea level rise, and the public is getting stuck with the bill.

The City's LCLUP should proactively detail the need for relocation of aging infrastructure along the coast — the LUP and staff modifications should explicitly call for planned realignment of the wastewater treatment plant infrastructure along the shoreline, including aging sewage lines and other utility infrastructure as it comes due for repair to move it out of highly vulnerable areas. The City should also plan to redesign the various runoff pipes that protrude from the bluffs for much of the northern portion of Pacifica, which contribute to bluff erosion and are likely to rely on shoreline armoring to function. Utility infrastructure, especially in Sharp Park, should not be replaced in the same location as it creates a perverse incentive for more armoring to protect it.

In the City's own economic analysis of sea level rise adaptation strategies, the City found that removing existing armoring and realigning infrastructure where practical provides a net economic benefit on the order of tens of millions of dollars in some places over time.<sup>3</sup>

### **Pacifica Needs an LCLUP, But Not at All Costs**

An LCLUP update for climate change hazards and sea level rise is a key part of a functional local coastal program and a well-managed coastline. An updated LCP will make Pacifica eligible for coastal resiliency grant funding, per recent State Legislation, SB 272; and funding is needed for major coastal resiliency work in Pacifica. With approximately **57 acres of beach, 78 acres of wetlands and several miles of coastal trail** in Pacifica at risk of being lost by mid to late century (according to the City's Sea Level Rise Vulnerability Assessment), the need for planning for sea level rise is vital. The latest draft Sea Level Rise Guidance from the Ocean Protection Council states that sea levels will rise by approximately 1 foot in just thirty years, which can have an extreme impact on beaches that are already uncrossable at high tides, as well as on erosion<sup>4</sup>.

Surfrider is invested in seeing an LCLUP approved in Pacifica. Our support is conditioned however, on a plan that includes policies consistent with the Coastal Act. An LCLUP that includes policies not consistent with the Coastal Act (such as SRAs) sets Pacifica down a path

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<sup>2</sup> Lester, et al. *Shoreline Retreat in California: Taking a Step Back*. Journal of Coastal Research. September 2022. <https://www.researchgate.net/publication/363795930>

<sup>3</sup> City of Pacifica, *Sea Level Rise Adaptation Plan: Pacifica, CA*. ESA. 2018. <https://www.cityofpacific.org/home/showpublisheddocument/862/637830110999030000>

<sup>4</sup> Draft Sea Level Rise Guidance, Ocean Protection Council. 2024 <https://opc.ca.gov/wp-content/uploads/2024/01/SLR-Guidance-DRAFT-Jan-2024-508.pdf>

of continuing risk both financially and environmentally. The SRA's outlined in the city's current alternative modifications could be devastating for Rockaway and Sharp Park Beach. Additionally the lack of consideration of realignment opportunities misses a major opportunity to make way for beaches in places like Beach Boulevard and restore bluffs and beaches in places like Esplanade and Palmetto.

The story of holding the line of development with armoring has already had a clear negative impact on public resources in Pacifica. One third of the City's six miles of coast is already armored. As the City's Adaptation Plan points out, erosion is causing loss of beach access, particularly in places where shoreline armoring is used. Shoreline armoring is also prone to failure:

- *Land's End Apartments* – seawall failure, temporary loss of vertical access
- *Manor Apartments* (300 block Esplanade Ave) – demolition of apartments after erosion endangered the apartments despite an existing rock revetment (shotcrete wall was not completed, loss of beach area)
- *The Bluffs Apartments* – loss of lateral access along rock revetment due to beach erosion 500 block Esplanade Ave – remaining two homes demolished, and prior bluff top trail endangered
- *West Avalon Drive at Esplanade Ave* – loss of lateral access along 500 block Esplanade rock revetment due to beach erosion
- *SF RV Park* – emergency rock revetment constructed after bluff erosion and loss of bluff-top access trail; storm drain damaged just south of the RV park at the public parking lot and erosion of vertical access ramp
- *Pacific Skies Estates* (a.k.a. Cottages at Seaside) to Beach Boulevard – loss of lateral access along revetments and seawalls
- *Beach Boulevard* – failure of retaining wall structure north of pier (1/11/2001 and 1/22/2016) and regular overtopping of both structures north and south of pier
- *Rockaway* – wave overtopping of seawall caused hotel damage (1/21/2017), loss of lateral access along seawall from beach erosion is greatest at high tide

Given the numerous failures of shoreline armoring, we strongly disagree with the logic of adopting policies that encourage further armoring as an adaptation response.

## **Conclusion**

Surfrider opposes the City's proposed SRAs and urges the City to identify locations where realignment of infrastructure is possible. Once these minimum changes are made, we hope to work with the City on an approvable LCLUP that sets forth a needed vision for Pacifica in the face of more frequent, stronger storms and flooding due to climate change and rising seas.

Sincerely,

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