

# **Public Comments**

## **Item 1 – Revised LCLUP**

Written Comments Received After 12pm on 05/23/2024



*May 23, 2024*  
*City Council Meeting*

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**From:** Samuel Casillas [REDACTED]  
**Sent:** Thursday, May 23, 2024 3:39 PM  
**To:** Public Comment  
**Cc:** Ringuette, Oceane@Coastal; KoppmanNorton, Julia@Coastal; Rexing, Stephanie@Coastal  
**Subject:** May 23, 2024 Special Council meeting: Continuation of Adjourned Special Meeting for consideration of Local Coastal Land Use Plan  
**Attachments:** LCLUP city council CEQA fatal flaws comments casillas 5 23 24.docx

**[CAUTION: External Email]**

Dear Christian,  
Please see my attached comments for tonight's meeting.

Thank you and godspeed in your new endeavors.

Cheers,  
Sam

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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: May 23, 2024

Subject: **May 23, 2024 Special Council meeting: Continuation of Adjourned Special Meeting for consideration of Local Coastal Land Use Plan**

Dear City Council:

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

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

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

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

The willful disregard of scientific data and fiscal prudence in order to appease realtor and developer corporate interests will lead to litigation where the city again will be found liable. I have yet to receive an answer as to who has been held accountable for the litigation losses at Vista Mar, 1567 Beach Blvd, 505 San Pedro Ave, and the mounting costs of the seawall project. The costs for the losses when this LCLUP is rejected by the courts will also cost our taxpayers millions.

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 (See exhibit D for Western Pond turtle), Aramai Point and the Pedro Point site would dictate otherwise and this potentially applies to the whole of the 2040 GP and its associated FEIR. Additionally, as policy the city's GP/LCP/EIR erroneously allows a deferred analysis as “site-specific as part of proposed development review” for hazards and biological studies to be done at the time a project is proposed. The city has chosen to defer biologic and hazard analysis as policy throughout the LCLUP and the 2040 GP which potentially invalidates the whole of the 2040 GP update where the city has chosen to change LUD/zoning from the 1980 GP/LCLUP. The city is advised that this policy is in violation of CEQA and may end up invalidating the whole 2040 GPU. By changing LUDs without proper CEQA/CA review the city is also purposely setting itself up for a “taking” of private land and would therefore violate its fiduciary duty to protect the city from potential liability.

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

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

Regards,

Samuel Casillas

Board member, PPCA

Past Vice-Chair, Pacifica Economic Development Committee

Past Member, Pacifica Sea Level Rise Adaptation Planning Committee

Past Co-Chair GGNRA Board Liaison Committee

Past Member, Pacifica GPU Community Outreach Committee

**Exhibit A: consistent flooding of Undeveloped San Pedro Ave Site**



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

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

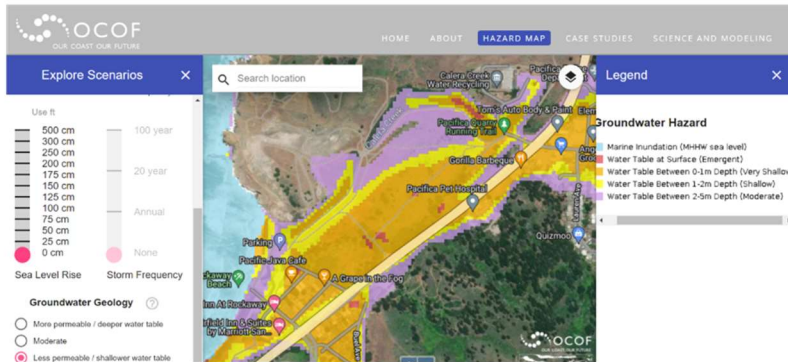
CCC Biologist Findings from its denial of an adjacent property at 505 San Pedro Ave (CDP application 2-19-0026 hearing on 3/12/21)



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

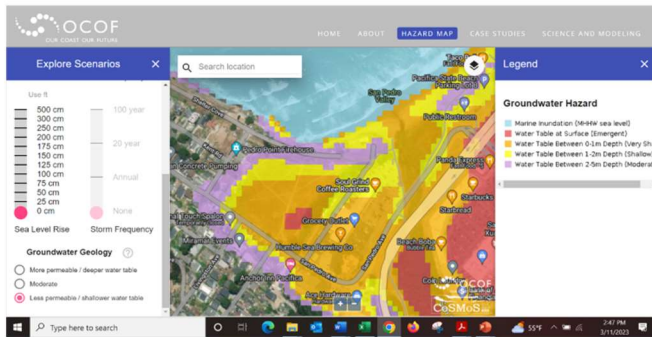
## Exhibit C: Hydrology and Ground modeling by USGS OCOF CoSMoS

### Groundwater Hazard at Quarry Property



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

### Groundwater hazard at Pedro Point Field and 505 San Pedro Ave



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

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





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**From:** Coffey, Sarah  
**Sent:** Thursday, May 23, 2024 4:46 PM  
**To:** Public Comment  
**Cc:** Murdock, Christian; Cervantes, Stefanie  
**Subject:** FW: Coastal Comm

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**From:** winton cleary [REDACTED]  
**Sent:** Thursday, May 23, 2024 4:42 PM  
**To:** \_City Council <citycouncil@ci.pacifica.ca.us>; Coffey, Sarah <scoffey@pacifica.gov>; Woodhouse, Kevin <kwoodhouse@pacifica.gov>  
**Subject:** Coastal Comm

**[CAUTION: External Email]**

Just say NO NO NO to the Castal Comm at this time

Winton Cleary

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**From:** Coffey, Sarah  
**Sent:** Thursday, May 23, 2024 3:12 PM  
**To:** Public Comment  
**Subject:** FW: City Council LCLUP Study Session #4.3, May 23, 2024; SF Public Golf Alliance for Extension of Sharp Park SRA to comprehend Sharp Park (Golf Course), Fairway Park, Mori Point  
**Attachments:** Ltr.SFPGA.to Pac.Ci.Cil.re.Pacifica.LCLUP.5.23.24.pdf

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**From:** Richard Harris Jr. <richard@sfpublicgolf.org>  
**Sent:** Thursday, May 23, 2024 3:04 PM  
**To:** Coffey, Sarah <scoffey@pacifica.gov>; Vaterlaus, Sue <svaterlaus@pacifica.gov>; Beckmeyer, Sue [REDACTED]; Bigstyk, Tygarjas <tbigstyk@pacifica.gov>; Boles, Christine <CBoles@pacifica.gov>; Bier, Mary <mbier@pacifica.gov>; \_City Council <citycouncil@ci.pacifica.ca.us>  
**Cc:** Woodhouse, Kevin <kwoodhouse@pacifica.gov>; Murdock, Christian <cmurdock@pacifica.gov>; Cervantes, Stefanie <SCervantes@pacifica.gov>; Phil Ginsburg (phil.ginsburg@sfgov.org) <phil.ginsburg@sfgov.org>; Potter, Spencer (REC) <spencer.potter@sfgov.org>  
**Subject:** City Council LCLUP Study Session #4.3, May 23, 2024; SF Public Golf Alliance for Extension of Sharp Park SRA to comprehend Sharp Park (Golf Course), Fairway Park, Mori Point

**[CAUTION: External Email]**

Pacifica City Clerk Sarah Coffey, Mayor Vaterlaus, Councilpersons, et al.  
Please find attached above further comment letter of San Francisco Public Golf Alliance (re advocacy for extension of SRA), for Council Special Study Session May 23. This to request City Clerk's Office to acknowledge receipt, circulate to Council Staff, and Planning Commissioners, and include in the meeting packet for tonight's meeting.  
Thanks and Best Regards All Around

Richard Harris  
San Francisco Public Golf Alliance  
826 Stanyan St.  
San Francisco, CA. 94117  
415-290-5718

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May 23, 2024

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

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

**San Francisco Public Golf Alliance Advocates extension of the Sharp Park Special Resiliency Area to the southern end of the Sharp Park berm, i.e., to include the entire Sharp Park-West Fairway Park-Mori Point Vulnerability Zone sub-area.**

Dear Mayor Vaterlaus and Council Members,

This is to supplement our previous letters to Your Council, dated February 25, 2024,<sup>1</sup> March 27, 2024,<sup>2</sup> and April 14, 2024<sup>3</sup> (letters incorporated herein by this reference), advocating for extension of the proposed Sharp Park Special Resiliency Area that would be created under the

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<sup>1</sup> Letter, SF Public Golf Alliance to Pacifica City Council, re Consultation Draft LCLUP.2.27.24  
[https://drive.google.com/file/d/12cwdlvP5KlwHlw46TGtNkEA63\\_pRFg1/view?usp=drive\\_link](https://drive.google.com/file/d/12cwdlvP5KlwHlw46TGtNkEA63_pRFg1/view?usp=drive_link)

<sup>2</sup> Letter, SF Public Golf Alliance to Pacifica City Council, re Consultation Draft LCLUP.3.25.24  
[https://drive.google.com/file/d/1vHuMe1pqU1zxoQUy4fP9A9KB6MNGSXem/view?usp=drive\\_link](https://drive.google.com/file/d/1vHuMe1pqU1zxoQUy4fP9A9KB6MNGSXem/view?usp=drive_link)

<sup>3</sup> Letter, SF Public Golf Alliance to Pacifica City Council, re Consultation Draft LCLUP.4.14.24  
[https://drive.google.com/file/d/19n109KQLQXkMM6w3quLTY752JMHeW0Yn/view?usp=drive\\_link](https://drive.google.com/file/d/19n109KQLQXkMM6w3quLTY752JMHeW0Yn/view?usp=drive_link)

“Special Resiliency Areas” rubric of Chapter 6 subsection 6.6, Pacifica April 2024 Revised Certification Draft LCLUP<sup>4</sup> (hereafter, the “April Draft LCLUP”).

In the text and accompanying photos and Exhibits to those prior February 25, March 27, and April 14, 2024 letters, we have provided evidence that the coastal protection structure of the San Francisco-owned Sharp Park berm provides public coastal access (four separate coastal access points) and access to no-cost and low-cost public recreation, including handicapped access and recreation, protection of ESHA, endangered species, scenic coastal views, emergency vehicular access to the Coastal Trail and the GGRNA’s Mori Point trails and scenic view spots, protection of two Pacifica historical landmarks --- Sharp Park Golf Course and its Clubhouse, protection of Pacifica critical infrastructure including sanitary sewers and a force main and Pacifica storm drain infrastructure including the storm drain pumphouse located immediately adjacent to the Sharp Park berm at its southern end, and flood protection for modest and low-cost housing in the West Fairway Park neighborhood and the small mixed residential/commercial neighborhood adjacent to the northeast corner of the golf course, where 20 percent of the City of Pacifica’s “affordable rental” units are located in a single large apartment building.

**City of Pacifica** Staff addresses a few of the issues relating to critical infrastructure and protection of the West Fairway Park residential subdivision in Council’s Agenda Packet for the May 23 Special Study Session #4.3, Attachment H, “Responses to Council Questions”<sup>5</sup>, as follows:

**P. 326**

**Q: If part of their purpose is to protect existing infrastructure why does it start and stop in West Sharp Park? What about the golf course? . . .**

**A: The SRA boundary was decided in part based on the location of existing publicly owned and continuous shoreline protection structures. Additionally, “existing infrastructure” includes more than utilities. It includes public infrastructure like sidewalks, roads, trails, and public parking. In the Sharp Park and Rockaway SRA boundaries, the public infrastructure is directly behind the existing shoreline protection structures and would be imminently threatened by removal of the shoreline protection structures.**

**Q: Why aren't the Golf Course and West Fairway Park neighborhood included in the SRA's? What about the utilities running under the golf course? Who pays if they have to be relocated?**

**A: As mentioned above, the SRA boundary was decided on a number of factors, including the presence of existing shoreline protection structures that protect existing public infrastructure. The West Fairway Park neighborhood does not have any existing shoreline protection structures. The Sharp Park Golf Course berm provides protection for the golf course and some coverage for the neighborhood, but it does not protect the wide variety of public infrastructure like the West Sharp Park and Rockway Beach shoreline protection structures. The public utilities within the Sharp Park Golf Course are not abutting the existing shoreline protection structure, they are further east and thus may not require**

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<sup>4</sup> The April 2024 Revised Certification Draft LCLUP is found at Attachment G of the Agenda of Council’s May 23, 2024 Special Meeting, at p. 56ff; Subsection 6.6 is found at Page 6-17 (Packet pg. 244):

<https://pacificacityca.igmp2.com/Citizens/FileOpen.aspx?Type=14&ID=1535&Inline=True>

<sup>5</sup> Agenda of Council’s May 23, 2024 Special Meeting, Attachment H, Response to Council Questions, at Pkt. Pp. 324-346:

<https://pacificacityca.igmp2.com/Citizens/FileOpen.aspx?Type=14&ID=1535&Inline=True>

relocation in the short and medium -term based on sea level rise and coastal erosion projections.

**P. 332 – 333**

Q: Specifically, what infrastructure, if any, is currently protected by the berm?

A: It is difficult to characterize whether the infrastructure discussed below is “protected by” the Sharp Park Golf Course Berm. Site-specific hazard analysis has not been performed and year 2100 modeled coastal erosion without the berm is not modeled to significantly encroach into the Sharp Park Golf Course based on the Coastal Vulnerability Zone maps. In addition, much of the infrastructure that is present is located well inland of the berm. [P. 333] Therefore, the remainder of this response addresses the presence of infrastructure in the Sharp Park Golf Course area without opining on whether it is protected by the berm. Public Works staff has assessed the presence of public infrastructure in the Sharp Park Golf Course area and concluded three agencies own and operate infrastructure in this area: City and County of San Francisco, City of Pacifica, and North Coast County Water District (NCCWD). The City and County of San Francisco owns and maintains stormwater infrastructure within the Sharp Park Golf Course property which is shown in the figure below. Some City of Pacifica stormwater infrastructure is also shown in the figure, outside the Sharp Park Golf Course property, generally to the south and east of the golf course. The City of Pacifica owns and maintains sewer infrastructure within the Sharp Park Golf Course property as shown in the attached map (PDF). The sewer infrastructure consists of a 15” gravity line flowing northward from the West Fairway Park neighborhood into the West Sharp Park neighborhood, and a 24” force main flowing southward from West Sharp Park toward the Calera Creek Water Recycling Plant. See excerpt from City of Pacifica Storm Drain Master Plan below.



**P.339**

Q: What benefit do properties in the SRA's have that others outside of the SRA's do not have? What is the consequences for west fairway park being outside of the SRA? How can we explain to this neighborhood that they are not being "left out"?

A: The key policy component of the SRA policies is that development can include protection provided by an existing shoreline protection structure in the coastal hazards analysis required as part of development review. Beyond that, development that is proposed subject to the SRA policies would be subject to mostly the same requirements as property outside an SRA. With that in mind, **there is no particular benefit to the West Fairway Park neighborhood from inclusion in the West Sharp Park SRA because the existing shoreline protection structures in the area (Beach Boulevard seawall and Sharp Park Berm) do not currently address the applicable flooding hazard for the area. The SRA policies primarily provide benefit in relation to coastal erosion hazards which are not applicable to the West Fairway Park neighborhood.**

### **Pacifica Staff's Responses to These Councilmember Questions are Problematic**

1. The foregoing Staff responses do not admit or recognize that the Sharp Park Pumphouse is (i) located immediately adjacent to the Sharp Park Berm<sup>6</sup> (see EXHIBIT A, hereto), obviously well within both the “beach erosion” and the “flood hazard” zones protected by the Berm; and (ii) is a critical part of Pacifica’s Storm Drain Infrastructure, which at Sharp Park serves as the ultimate destination and drain and outfall not only for Fairway Park’s storm drains, but also for those of Outlook Heights at the top of Sharp Park Road, for Sharp Park Road itself, for Francisco Blvd. fronting the golf course, and for the Freeway as it cuts through the golf course.<sup>7</sup> The Pumphouse pumps all of this Pacifica storm drainage through the Berm and out to the sea.<sup>8</sup> (See copy of the map attached hereto as EXHIBIT B.) And see the Hazard Mitigation-Assets Exposure Map, Appendix B-3 to Pacifica’s SLR Vulnerability Assessment, showing the Pumphouse with a circled P near the storm drain’s Sharp Park ocean outfall.<sup>9</sup> (Copy attached hereto as EXHIBIT C.) The map segment attached to Staff’s Response to Councilmember Questions, above, does not show the Pumphouse at all.
2. Staff’s Answer to Council’s Question at the May 23 Agenda at Page 339, above (that there is “no particular benefit to the West Fairway Park neighborhood from inclusion in the West Sharp Park SRA because . . . the Sharp Park berm do not currently address the applicable flooding hazard” is dubious, and appears to ignore both the “Flooding” / “Coastal Flooding” text and the “Flood Zones” map (Figure 5-3) found in Section 5, Natural Hazards, of the April 2024 Draft LCLUP, including:

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<sup>6</sup> See Photographs of the Pumphouse, showing its relationship to the Berm, at Exhibit 5 to our March 25, 2024 Letter to City Council. A copy of that Exhibit 5 is attached as **EXHIBIT A** hereto.

<sup>7</sup> See [Map at City of Pacifica Storm Drainage System Master Plan](https://www.cityofpacific.org/home/showpublisheddocument/12210/637931377778730000), Carollo Engineers, February 2012, Fig. 4.1 (3 of 5), at p. 59/129 <https://www.cityofpacific.org/home/showpublisheddocument/12210/637931377778730000>

<sup>8</sup> See Letter, SF Public Golf Alliance to Pacifica City Council, re Consultation Draft LCLUP.2.27.24, at p.6, “Storm Sewers”: [https://drive.google.com/file/d/12cwdlvP5KlwHlw46TGtNkEA63\\_pRFg1/view?usp=drive\\_link](https://drive.google.com/file/d/12cwdlvP5KlwHlw46TGtNkEA63_pRFg1/view?usp=drive_link); and

<sup>9</sup> Letter, SF Public Golf Alliance to Pacifica City Council, re Consultation Draft LCLUP.3.25.24 at p. 4, fn.14 and Exhibit 7 [https://drive.google.com/file/d/1vHuMe1pqU1zxoQUy4fP9A9KB6MNGSXem/view?usp=drive\\_link](https://drive.google.com/file/d/1vHuMe1pqU1zxoQUy4fP9A9KB6MNGSXem/view?usp=drive_link)

Page 5-16 (Pkt. Pg. 215)

### 5.3 FLOODING

“Flooding has been an ongoing issue for low-lying areas of Pacifica, and likely will continue to be a challenge in the future, including possible inundation from a tsunami wave.”

Page 5-16 (Pkt. Pg. 215-516)

#### Coastal Flooding

Pacifica can also experience flooding from coastal sources, which occurs as some combination of high tides, large wind-driven waves, storm surge, and/or tsunami waves. Areas with the potential for coastal flooding are the low-lying areas along the coast, including the Sharp Park Golf Course/Laguna Salada area and Pacifica State Beach.

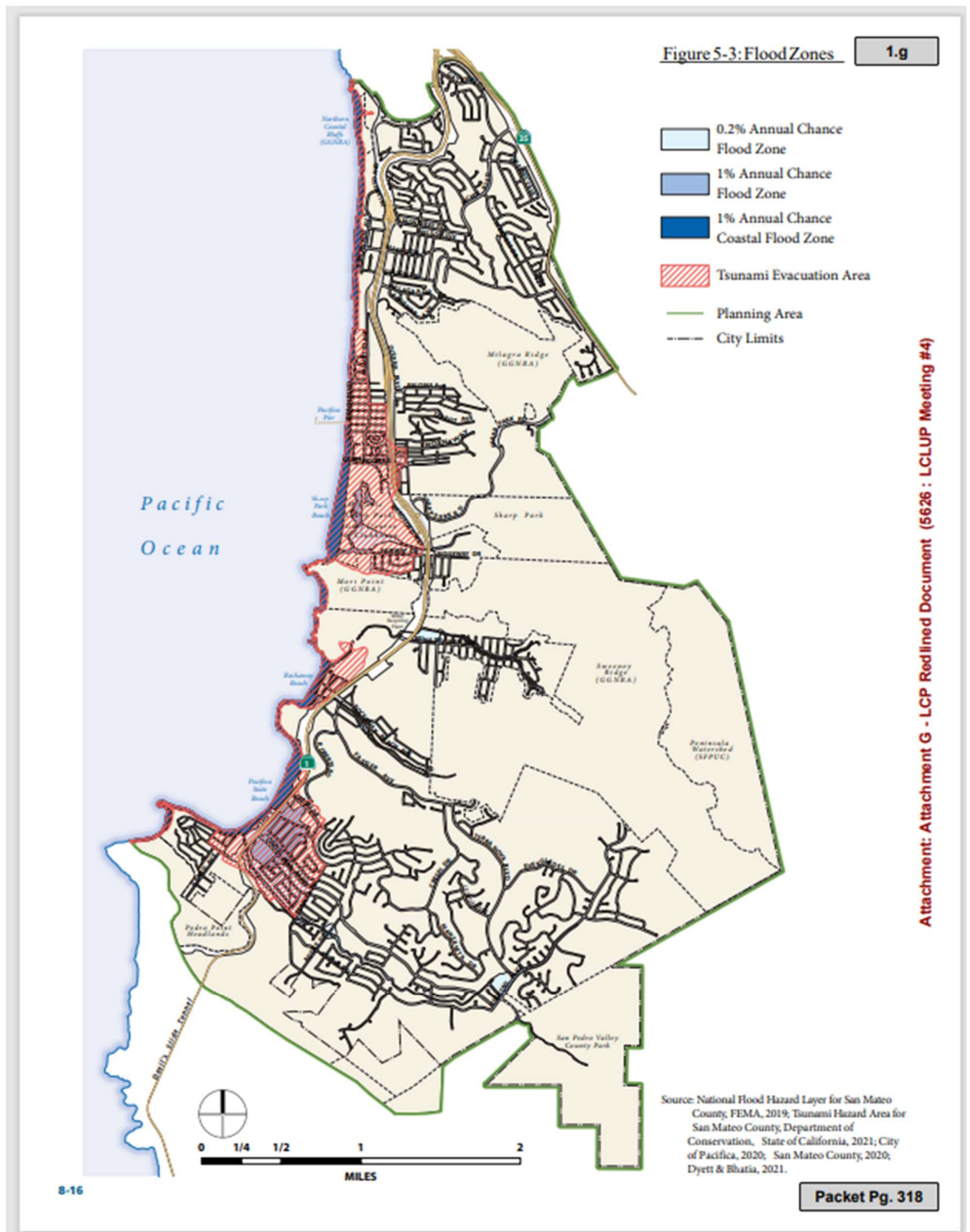
(216) The only section of coastline protected by levees is the Sharp Park Golf Course area. However, drainage from Sanchez Creek and Laguna Salada to the ocean can be insufficient to prevent lowland flooding during high tide/high flow events.

Pg. 5-19 [Pkt. Pg.218]

**TSUNAMI** Recorded tsunami run-up magnitude is generally lower at Pacifica than other locations from San Francisco to Monterey, likely due to offshore bathymetry and **shoreline alterations along the city**. Tsunami hazards are generally coincident with the coastal flooding zones: at the Sharp Park Golf Course/Laguna Salada area.

And see copy of the April 2024 Draft LCLUP’s Figure 5-3 Flood Zones map (including Tsunami), below, from Section 5, Natural Hazards.





Note that the Tsunami Zone in the Sharp Park/West Fairway Park area occupies virtually the entire golf course property and virtually the entire West Fairway Park neighborhood. This is the “probabilistic” once-in-every-975-year Tsunami, per the annotations to the California Geological



Survey's Tsunami Hazard Area Map for the County of San Mateo, Mar. 23, 2021.<sup>10</sup> Also note the April 2024 Draft LCLUP's comments, below (at Pages 5-16 and 5-19, Pkt. Pgs. 215, 218) that "drainage from Sanchez Creek and Laguna Salada to the ocean can be insufficient to prevent lowland flooding during high tide/high flow events," and that "likely due to . . . shoreline alterations along the city [i.e. shoreline protection structures like the Sharp Park Berm] . . . recorded tsunami run-up magnitude is generally lower at Pacifica than other locations from San Francisco to Monterey".

Page 5-16 (Pkt. Pg. 215)

### 5.3 FLOODING

"Flooding has been an ongoing issue for low-lying areas of Pacifica, and likely will continue to be a challenge in the future, including possible inundation from a tsunami wave."

Page 5-16 (Pkt. Pg. 215-516)

### Coastal Flooding

Pacifica can also experience flooding from coastal sources, which occurs as some combination of high tides, large wind-driven waves, storm surge, and/or tsunami waves. Areas with the potential for coastal flooding are the low-lying areas along the coast, including the Sharp Park Golf Course/Laguna Salada area and Pacifica State Beach. (216) The only section of coastline protected by levees is the Sharp Park Golf Course area. However, drainage from Sanchez Creek and Laguna Salada to the ocean can be insufficient to prevent lowland flooding during high tide/high flow events.

Pg. 5-19 [Pkt. Pg.218]

**TSUNAMI Recorded tsunami run-up magnitude is generally lower at Pacifica than other locations from San Francisco to Monterey, likely due to offshore bathymetry and shoreline alterations along the city. Tsunami hazards are generally coincident with the coastal flooding zones: at the Sharp Park Golf Course/Laguna Salada area.**

### In Sum . . .

The Sharp Park Berm protects and enables and accesses numerous coastal resources, and provides protection for the historic landmark golf course and its historic landmark clubhouse, and its neighbors. It is not true that the Fairway Park residential subdivision derive no flood protection from the Berm. The major flood events in that low-lying neighborhood have resulted from the coincidence of high seas and sustained heavy rains, with resultant creek flooding and flooding caused by Pacifica's extensive storm drains that deposit the neighborhoods – and their streets – runoffs into the golf course. When that happens, the Sharp Park storm drain pumphouse – which has been an important part of Pacifica's storm drain infrastructure – serves as the bailing pump.

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<sup>10</sup> California Geological Survey, Tsunami Hazard Area Map, County of San Mateo, March 23, 2021, "Method of Preparation": [https://www.conservation.ca.gov/cgs/Documents/Publications/Tsunami-Maps/Tsunami\\_Hazard\\_Area\\_Map\\_San\\_Mateo\\_County\\_a11y.pdf](https://www.conservation.ca.gov/cgs/Documents/Publications/Tsunami-Maps/Tsunami_Hazard_Area_Map_San_Mateo_County_a11y.pdf)

**For these reason, and for the reasons enumerated in our previous letters, we advocate that in the event Pacifica adopts the Special Resiliency Area protocol, that the entire Sharp Park-West Fairway Park-Mori Point Vulnerability Zone subarea be included in a Special Reliability Area.**

Respectfully submitted,

*Richard Harris*

President, San Francisco Public Golf Alliance

Encls.

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

## **EXHIBIT A**

**Exhibit 5 Storm Sewer Pumphouse at southwest corner of Golf Course, next to Levee**



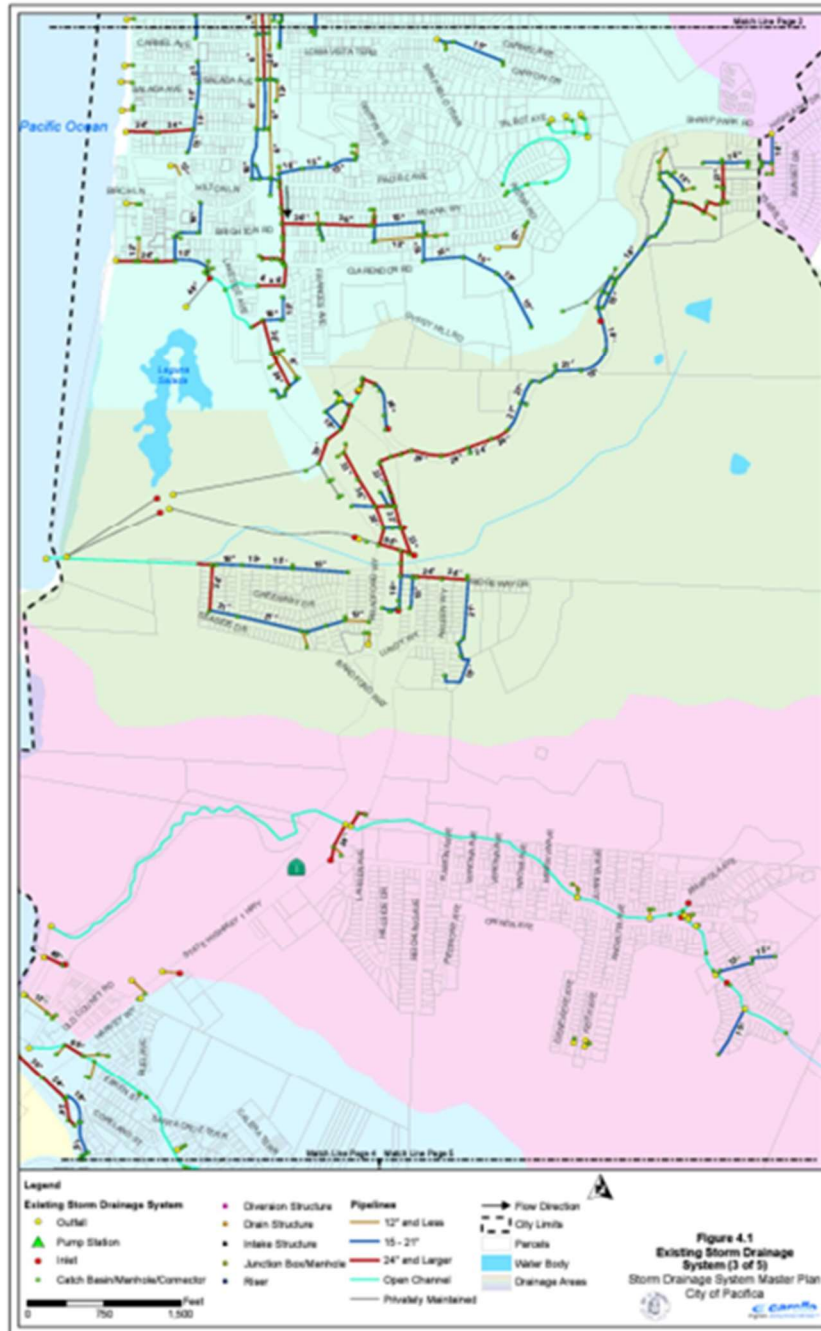
**Pumphouse (above) and repair (circa 2008), with heavy equipment operating from the Levee (below)**



## **EXHIBIT B**

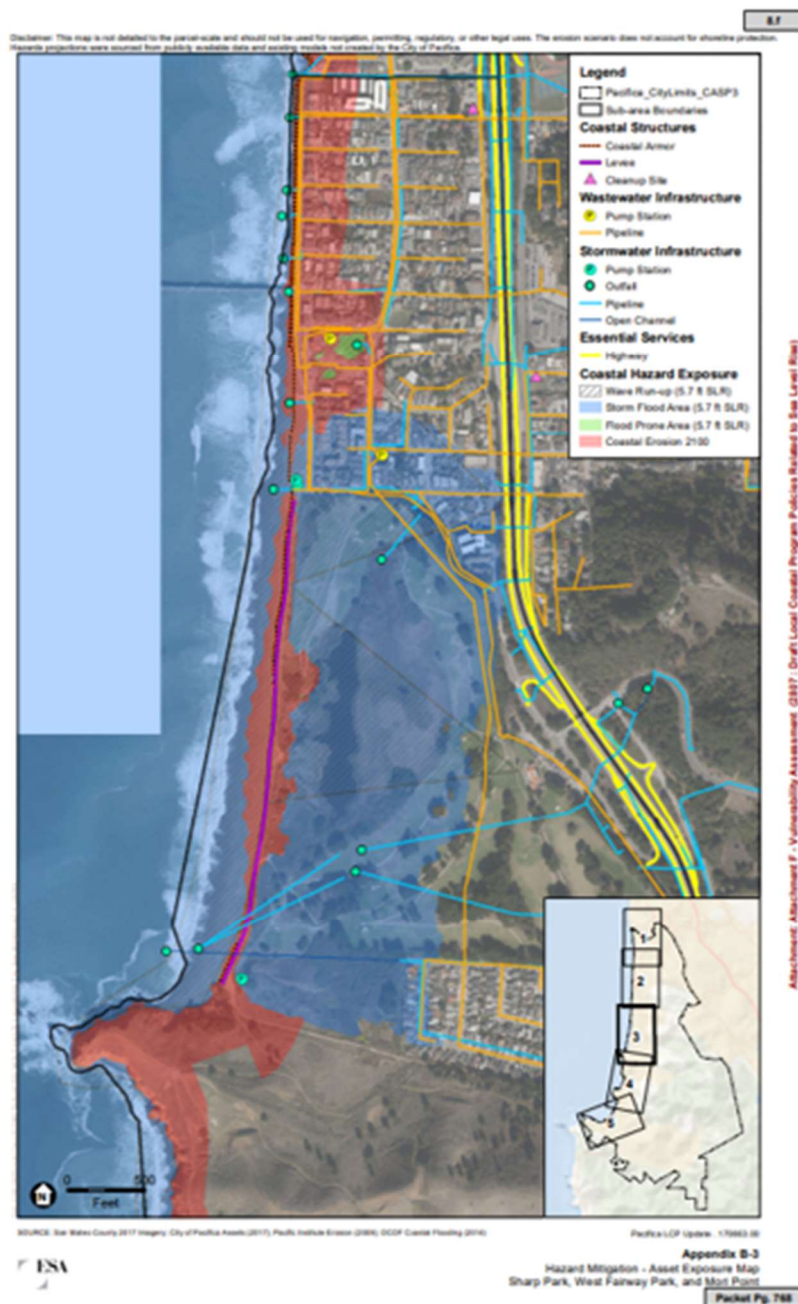
## Exhibit 3

### Storm Drain System Map





**Exhibit 7 Hazard Mitigation – Assets Exposure Map, Sharp Park, West Fairway Park, Mori Point Vulnerability Sub Area, Pacifica Vulnerability Assessment (ESA, May 2018)**



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**From:** Coffey, Sarah  
**Sent:** Thursday, May 23, 2024 3:48 PM  
**To:** Public Comment  
**Subject:** FW: Local Land Use Plan needs to be halted immediately.

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**From:** Frank Vella [REDACTED]  
**Sent:** Thursday, May 23, 2024 3:42 PM  
**To:** \_City Council <citycouncil@ci.pacifica.ca.us>; Coffey, Sarah <scoffey@pacifica.gov>; Woodhouse, Kevin <kwoodhouse@pacifica.gov>  
**Subject:** Local Land Use Plan needs to be halted immediately.

**[CAUTION: External Email]**

Dear Council,

Please stop this Local Land Use Plan. I recently read the letter from North Coast County Water district. They are concerned also about this plan or lack of a plan moving forward. Updated sea level rise estimates are out soon. Everything needs to be revised. Christian Murdock who seemed to have the most comprehensive understanding of the plan yet was also unclear on so many things about the plan is now leaving. Another reason to move on to stop this disastrous plan. The demands by the Coastal Commission, who doesn't cooperate with anything at all, is a huge reason to stop this plan.

I've even had discussions with a council person who apparently has been spreading misinformation, I will believe that was an honest mistake, has been making this process worse. Calling out other residents, and other council members for spreading "mistruths" or "B.S.", no place for council members to be saying this of citizens.

Do what's right for Pacifica, please!

Frank

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**From:** mark stechbart [REDACTED]  
**Sent:** Monday, May 27, 2024 1:01 PM  
**To:** dwilliams@pacificasd.org; [REDACTED]; lvillalobos@pacificasd.org;  
npatel@pacificasd.org; ebredall@pacificasd.org; kdoggett@pacificasd.org;  
lbrocchini@pacificasd.org  
**Cc:** \_City Council; Public Comment  
**Subject:** June 4 council mtg-- Ibl remodel affected by coast commission restrictions  
**Importance:** High

**[CAUTION: External Email]**

time to pay attention to and seek immediate clarification of pending city adopted CCC conditions on IBL remodel.

As below, city has no answers. The issue cannot be ignored.

middle school remodel at risk:

On May 23 at council hearing, Mayor Vaterlaus put this question to the planning director:

"pls generate a site specific analysis of CCC demands on IBL Middle school remodel. A \$70M remodel bond—Measure G March 2024—was passed. Assume IBL already exceeds 50% modification; structural modification rules applies, so school district and public expectations of a IBL remodel will be severely curtailed by council CCC actions. Need details."

Plan dir said he couldn't answer question without more research.

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**From:** mark stechbart [REDACTED]  
**Sent:** Friday, April 12, 2024 9:41 AM  
**To:** dwilliams@pacificasd.org <dwilliams@pacificasd.org>; [REDACTED];  
lvillalobos@pacificasd.org <lvillalobos@pacificasd.org>; npatel@pacificasd.org <npatel@pacificasd.org>;  
ebredall@pacificasd.org <ebredall@pacificasd.org>; kdoggett@pacificasd.org <kdoggett@pacificasd.org>;  
lbrocchini@pacificasd.org <lbrocchini@pacificasd.org>  
**Subject:** Ibl remodel affected by coast commission restrictions

Best pay attention to and attend city council april 15 mtg on coastal commission demands Re coastal zone (west of hwy 1) building remodel and improvements.

Whatever your plans are for IBL, coastal commission will have final say.

[Savepacific.org](http://Savepacific.org)

All the best/

mark stechbart

[REDACTED]

[REDACTED]

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