

From: [Christine Boles](#)
To: [Public Comment](#)
Subject: BBIRP comment for this evening's meeting
Date: Wednesday, June 9, 2021 4:00:33 PM
Attachments: [BBIRP Public comment Boles 6.9.21.pdf](#)
[Boles document requests 20210609.pdf](#)

[CAUTION: External Email]

Please see attached comments.

Christine Boles, Architect

[REDACTED]

[REDACTED]

Pacifica, CA 94044

[REDACTED]

[REDACTED]

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

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DATE: June 9, 2021

TO: City of Pacifica City Council

RE: Beach Boulevard Infrastructure Resiliency Project Public Comment

Dear Mayor Beckmeyer, Mayor Pro-Tem Bier, and Councilmembers Bigstyk, O'Neill and Vaterlaus,

I respectfully submit the following comments on the City of Pacifica's Beach Boulevard Infrastructure Resiliency Project (BBIRP). I am a licensed architect and have been an active participant in three of the four BBIRP workshops, reading all of the reports prepared by GHD, including the most recent Updated Alternatives Analysis Report (AAR), as well as earlier reports commissioned by Pacifica prepared by Environmental Science Associates and the Army Corps of Engineers that analyze our fragile coastline, the littoral cell, and projections for sea level rise and coastal erosion. I have submitted multiple written and verbal public comments during the process, many of which have not been addressed or answered.

Our coastline, along with our hills are Pacifica's greatest resource. The decision you are faced with today impacts the very existence of our beaches as hard armoring has been proven to reduce sand levels in the vicinity, not just directly in front of the proposed new infrastructure. I fear there is critical information missing that would prohibit you from making a fully informed decision tonight to move forward, and I ask you to delay the vote until more information can be provided to you and to the public.

I have outlined my numerous concerns below.

- 1) The public process is flawed and incomplete. As I mentioned to you in public comments in a City Council meeting on February 8th after workshop #3, I was very impressed with the first two public workshops, but the third and now the fourth gave very little new meaningful information for the public to review that would enable us to provide any meaningful feedback. Even now that the consultant is proposing a hybrid model, there are no site plans of the proposed armoring, no discussion of how wall height might vary in the different locations, no discussion of how the wall placement might change from the existing condition to be able to minimize the height and visual impacts as well as design life. No detailed analysis or visual simulations were given to the public to be able to give meaningful input on the design.

abandoned.

- ii. I have also asked about mean high tide line and am still very confused. I was told by Public Works staff that the legal definition of mean high tide line is determined by the California State Lands Commission. Their [website](#) says, *“The United States Supreme Court has ruled that in tidal areas the boundary is to be located by identifying the intersection of the mean high tide line with the shore (Borax Consol., Ltd v. Los Angeles (1935) 296 U.S. 10). Typically, this includes using the National Oceanic and Atmospheric Agency’s measurement and calculation of the mean high tide tidal datum in the vicinity of the lands involved.*

The mean high tide line south of the pier can easily be determined this way as we can see the tide line on the beach. North of the pier, however, the water hits the wall, not a shore. Does that not indicate that the mean high tide line is actually already inland of the existing wall and therefore non-compliant with our General Plan? If so, how can a new wall in the same location be approved?

b) 2014 Draft General Plan

The 2014 Draft General Plan section SA-I-16 on Seawalls and Shoreline Protection says, *“Wherever feasible, shoreline protection shall take the form of non-structural measures, such as setback, redesign, relocation or beach replenishment.”*

- i. The ideas presented thus far by the GHD have not shown any non-structural solutions, despite repeatedly being asked by residents at the meetings, and despite the General Plan saying clearly that these are preferred alternatives.
- ii. While the hybrid model as described includes beach replenishment, the replenishment is not a part of the calculated structural integrity of the armoring. If the city ran out of money in the future, the replenishment would not be technically necessary. I do not believe this approach satisfies the requirements of the General Plan as beach nourishment is not integral to the design of the shoreline protection needed.
- iii. South of the pier, we seem to have ample space to consider non-structural solutions, with a deeper beach and dunes. Why are these solutions not being considered here? Also, this portion of the wall south of the pier still has a 20-year life remaining and is topped with open railings allowing access and visibility to the ocean. Why would we even consider spending money now to replace it with hard armoring that cuts off ocean views and that only extends the design life 30 extra years? Couldn’t this be construed as a misuse of public funds?

c. 2014 Draft Local Coastal Land Use Plan

- i. At Workshop 4 Pacifica Planning Department Staff inaccurately referred to this document as a “certified draft”. While this document was approved by the City Council in 2020, it has not been approved by the Coastal Commission, so the word certified is misleading.
- ii. The city’s [website](#) is not being updated with recent draft revisions and correspondence with the Coastal Commission regarding the LCLUP despite requests from the public. I was able to obtain correspondence from the Coastal Commission dated January 12, 2021 which indicates that the draft LCLUP is still far from being approved. In this letter, CCC Coastal Planner Julia Koppman Norton writes, *“While we have made progress in prior discussions on the draft LCLUP update, we note that the City did not incorporate a number of edits and feedback provided by Commission staff throughout the City’s review and approval process for this draft update. Specifically, it seems that Commission and City staff continue to disagree on the natural hazards and coastal resilience policies and definitions. Without progress on these major differences, Commission staff expects to suggest a significant number of modifications to the draft update. Therefore, it is likely that we will identify, and where necessary propose, suggested modifications to address such issue areas as part of our ongoing review of the proposed LCLUP update transmitted to date.”*
- iii. It appears that Pacifica’s City Council has limited the scope of GHD’s work to this draft LCLUP, and has specifically told GHD not to consider managed retreat. Quoting from the GHD’s AAR page 29, *“Furthermore, the LCLUP Certification Draft approved by the City Council does not recommend Managed Retreat as a sea level rise adaptation policy for the Sharp Park area*

(LCLUP, pages 6-11)” GHD’s work therefore may not comply with the final LCLUP that is actually approved, and design decisions made based on this information may be challenged or outright denied by the Coastal Commission. Should not the LCLUP be completed and certified before the Council approves additional use of grant funding to continue with a specific hybrid sea wall design? Are we possibly wasting our precious grant funding and precious time as our existing armoring north of the pier is already failing and costing huge sums of money in repairs over the last few years.

- iv. Our mayor has publicly stated on camera that Pacifica does not want managed retreat, and yet no public vote has been taken. Is she really speaking for all of Pacifica? I understand managed retreat is a difficult topic, fraught with financial and emotional issues, but sticking our heads in the sand and ignoring the reality that the seas are rising and that we cannot armor our way out of sea level rise indefinitely is not the leadership the city or its residents need.
- v. We have already lost apartment buildings to the ocean, forcing residents to flee with last minute evictions because of lack of planning and foresight. There are several buildings teetering on the edge of our ocean bluffs tonight in the Manor district. GHD’s calculations of cliff erosion are an average number over several years, but this is not an accurate or realistic measure. Our friable sandy cliffs erode in huge chunks during El Nino winters, sometimes 20 feet at a time as was seen in 2015. By not addressing these issues head on with long term visionary plans, I would call Pacifica’s current process “mis-managed retreat”.

3) GHD’s contract requirements have not been met.

GHD’s Master Agreement Contract, dated 5/26/20, Task 1.4.1 Flood Assessment Risk and Adaptation Plan says, *“The Team will also identify other potential flood protection alternatives, such as secondary walls landward of primary seawall, landscaping, raising Beach Boulevard and installing drainage, close Beach Boulevard to non-resident traffic or all vehicles, relocate utilities landward, and other potential improvements.”*

- i. I have not seen any analysis of secondary walls, the possibility of closing or raising Beach Boulevard, or the relocation of utilities in the reports that were shared. All of these options would contribute to a longer term, sustainable and resilient design. Why were these not done? I posed these questions in the public workshop on April 29 but never received an answer, except to say that they might be considered later in the process. How can they possibly be fully considered if the Council approves the direction to move ahead with the hybrid option tonight?
- ii. Also from GHD’s contract, *“Of particular importance, we will describe potential approaches for addressing the gap between the existing Beach Boulevard seawall and the Sharp Park Golf Course levee. We understand that this location is currently managed by placing a sand bund to provide coastal protection and facilitate beach access, but that a more formal protection is desired.”* Again, none of the information shared thus far addresses this critical gap that causes regular flooding to the nearby homes.
- iii. As a member of the public, the lack of follow through on these contractual requirements raises suspicions that the city council or staff is limiting the scope of work of the consultant without informing the public. I filed a formal Public Records Request on February 10th, 2020 (see attached) and was only given Item 1 of 4, the GHD contract. The city determined that it has non-exempt, non-privileged records for the other three items, and asked for an extension to April 30 due to COVID. These records have still not been provided. I sent a follow up email to the City Clerk and the City Manager Kevin Woodhouse on May 14, 2021 and have still not received a response. The City Council goals include *“An Engaged Community’ includes taking actions to restore trust in city government, expanding communication, and building community.”* How do you expect the public to be engaged if they are blocked from accessing critical information? Unfortunately, public trust has been further eroded though the process on this project.

4. Lack of Infrastructure Resiliency in Analysis and Design Solutions

The title, Beach Boulevard Infrastructure Resiliency Project is a misnomer.

- a) GHD has done a thorough financial analysis of the infrastructure and losses in the "no project scenario", but there was no detailed information showing the location of the various items costed, or a detailed breakdown of individual costs. For example, if we decided to move the seawall inland 10' so that the design height could be lowered for better pedestrian and vehicle views to the ocean, what would the cost be of only moving the infrastructure under Beach Boulevard?
- b) I and several other community members have asked repeatedly for documentation of the sewage infrastructure in the area. Pacifica has already been fined over \$1,000,000 recently for a sewage outflow into the ocean in Linda Mar during winter storms. We residents and taxpayers are concerned about the costs of course, but more importantly the environmental impacts and the ability of our sewers to remain functional in a catastrophic event. There are sewer lines running under Beach Boulevard that serve local residents, and also a pipe that crosses the channel north of Paloma Avenue from the Shoreline neighborhood which is very susceptible to damage from storms or earthquakes. The Sharp Park Pump Station is a collection point for the sewage for approximately 16,000 households on the north side of town, that then pumps it over the hill to our sewage treatment plant. The image below is from the Multi-Hazard Risk Assessment. GHD's analysis shows this infrastructure in harm's way with projected sea level rise (Yellow circle with P) and even proposes a location for moving it inland (Green P). Why are discussions about this critical infrastructure not even allowed to be part of the conversation?

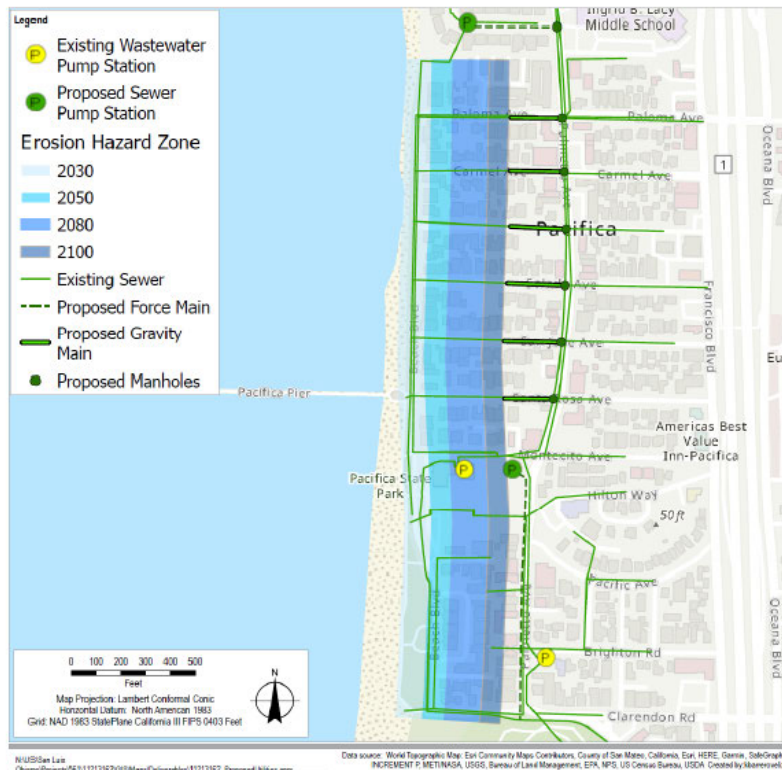


Figure 5-3 Sanitary Sewer System

- c) Page 29 of the Alternatives Analysis Report says - "moving infrastructure will be considered when it is at end of design life", presumably this approach was agreed to by GHD and city leaders. While the condition of this infrastructure and its remaining design life has not been shared in detail, this approach assumes no catastrophic events. The sea wall is only being designed with a 50-year life and will still be subject to overtopping in storms and king tides flooding the area. How can this project claim to build long term resiliency for our infrastructure without this analysis? We are not building long term resiliency if we are only designing a major public works project at a cost of \$114 million to last for 50 years that fails to consider moving critical infrastructure.

- d) Beyond the construction costs, has a financial analysis been done for the proposed hybrid option? For example, it seems that there would be a lowering of property values in the area if the ocean was no longer visible from the ground floor, or from streets in the area. Would less people would come to frequent the businesses and restaurants in the area? How would this option effect the ability of the city to meet their goals for redevelopment in the draft Sharp Park Specific Plan? It seems obvious that the area would be less attractive to developers. Why would they spend the extra money to build buildings that will last in a very harsh coastal environment if the coast is not even visible? I would suggest to my developer clients that they should choose sites further away, out of harms way, and with an actual view of the ocean.

5. Possible Inadequate or Flawed design criteria

- a) Why are we only planning for two feet of sea level rise, when the probability of SLR exceeding this amount by 2070 is 13%? Also according to page 12 of GHD's report, "OPC's strategic plan includes an objective of ensuring the California coast is resilient to 3.5 feet of sea level rise by 2050", 20 years earlier!
- b) Two feet of sea level rise will increase wave hazard zones 8-10 feet high and 50-75 feet landward per GHD's report on page 12. Are we doing enough to protect us from predicted hazards?
- c) Cliff erosion rates are one of the highest in the San Francisco Littoral Cell (Griggs 2020). Chances are that all the sand nourishment could easily disappear in one bad winter.

5. Project financial viability is questionable, what is our backup plan.

- a) There is no certainty of funding. The Army Corps of Engineers already analyzed one project to replace the wall back in 2017. The Federal Interest Determination Study said that cost/benefit analysis rendered the project ineligible for their program. What are our chances for finding other sources of money? Communities all over the US are experiencing the drastic effects of sea level rise and will be competing for the same funds. What are our realistic chances of receiving funding if we are competing with larger cities like San Francisco with a much larger population and much more valuable infrastructure to protect?
- b) What is our backup plan if we are not able to get funding? Even if we are able to get funding, it will take years to design and build the wall. What temporary measures should we be exploring to shore the existing failing armoring on the north side of the wall to have time to develop more viable long term solutions?
- c) And what about the rest of Pacifica that is also struggling with sea level rise and coastal erosion? My neighborhood, the Manor District for example, actually has more public infrastructure at risk than Sharp Park according to the 2016 Sediment Study. What about Rockaway and Pedro Point, or the deepening ravine that now threatens Palmetto Avenue across from the Fish and Bowl site?

There was one very enlightening comment by GHD's senior project engineer, Gillian Millar, who obviously has a healthy respect for the ocean. In essence, she said a new wall will not stop the sea, it will only buy us time. Even if you choose today to build this wall, we need to start working immediately to address climate change and long-term solutions for all of Pacifica, not just Sharp Park. We need visionary leadership, from the Council, City Manager's office, and staff. I know you as Council are in a difficult position without technical training in these matters and in essentially a volunteer position with limited time where you are still required to hold full-time jobs unless you happen to be independently wealthy. Perhaps we need to re-think our model of city government. It is not your responsibility to know all the answers, but it is your responsibility to hire properly trained and experienced staff to guide you in these decisions. Do you have the right people on staff, and why do you regularly publicly impugn the California Coastal Commission when they are the most knowledgeable organization in the state and are helping many communities tackle these very same issues?

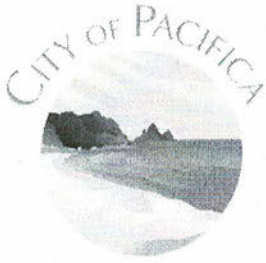
We must start talking about real resiliency, the ability to adapt to rising sea levels and threats from climate change for the next 100+ years if Pacifica is to survive beyond our lifetimes. We are the stewards of this magnificent part of the beautiful California coast. We need visionary leadership that can help residents deal with reality and not just put the problem off to the future by hiding behind a wall. Our children and grandchildren are depending on us.

Thank you for your service to our community,

Sincerely,

Christine Boles, Architect
Principal

Cc: Stephanie REXING, California Coastal Commission District Manager
Julia Koppman Norton, California Coastal Commission District Supervisor
Jackie Speier, Congresswoman 14th District
Anna Eshoo, Congresswoman, 18th District
Josh Becker, California Senator 13th District
Kevin Mullin, California state Assembly 22nd District
Len Materman, San Mateo County Flood and Sea Level Rise Resiliency District
Kevin Woodhouse, City Manager, Pacifica



Scenic Pacifica
Incorporated Nov. 22, 1957

CITY OF PACIFICA

170 Santa Maria Avenue • Pacifica, California 94044-2506
www.cityofpacifica.org

MAYOR
Sue Beckmeyer

MAYOR PRO TEM
Mary Bier

COUNCIL
Mike O'Neill
Sue Vaterlaus
Tygarjas Bigstych

April 2, 2021

Christine Boles
[REDACTED]

Pacifica, CA 94044

Via Email: [REDACTED]

Re: Public Records Request

Dear Ms. Boles:

The City of Pacifica is in receipt of your request for public records request received by the City Clerk's Office on February 10, 2021. A copy of your Request is enclosed for reference.

COVID-19 Emergency Update

On March 2, 2020, the Governor of the State of California declared a State of Emergency. On March 16, 2020, the City Manager, acting as the Director of Emergency Services, issued a Proclamation of local emergency due to the COVID-19 pandemic. That Proclamation was ratified by the City Council on March 18, 2020, by Resolution No. 18-2020. On March 19, 2020, Governor Newsom issued Executive Order No. 33-20, ordering all Californians to shelter at home, and the Bay Area region, including San Mateo County. Under California's "Blueprint for a Safer Economy" tier system, San Mateo County is currently within the "Moderate" tier, which encourages that non-essential office work be conducted remotely.

As a result of these extraordinary events, the City has taken steps to comply with the State's Executive Orders, by significantly reducing staffing, and closing City Hall to the public. Due to this closure and limited staffing resources, the City's ability to respond to all public records act requests has necessarily been delayed.

Need for Extension

The City wishes to cooperate to the fullest extent possible with the California Public Records Act (Government Code section 6250 *et seq.*) ("CPRA"). Under established California law, the City is obliged to comply with a request for a public record so long as the requester makes a specific and focused request for information, that information is maintained by the City in its ordinary course of business, the information is disclosable, and the record can be located with reasonable effort. The CPRA provides for the inspection or copying of existing identifiable public records; it does not compel the City to create new records, lists, privilege logs, or reports in response to a request. The City is typically afforded ten (10 days) from the date of receipt of the request to make a

determination whether the request seeks disclosable public records. (Government Code section 6253(c).) After ten days, for requests that create a need for the City to search for, collect, and appropriately examine a voluminous amount of separate and distinct records, the City is afforded fourteen (14) additional days to determine if it possesses responsive records, pursuant to Government Code 6253(c). In this case, the City began reviewing the Request to determine whether it had responsive records upon receipt. It was clear that making a determination would require the review of a voluminous amount of separate and distinct records, and that a fourteen day extension was warranted under Government Code 6253(c) for the reasons listed below. It was also clear the City's determination, as well as its search for and review of records, would be further delayed due to the closure of City offices and limited staffing resources due to the COVID-19 pandemic.

- ☒ [X] The need to search for and collect the requested records from facilities separate from the office processing the request.
- ☒ [X] The need to search for, collect, and appropriately examine a voluminous amount of separate and distinct records that are demanded in a single request.
- ☒ [X] The need for consultation with another department or agency that has substantial interest in the response to the request.
- ☐ [] The need to compile data, to write programming language or a computer program, or to construct a computer resort to extract data.

Responsive Records

After a reasonable and diligent search, the City has made the following determinations with respect to the following portions of your Request for "documents related to the Beach Boulevard Resiliency Project":

REQUEST NO. 1: "GHD contract"

DETERMINATION: The City has determined that it has non-exempt, non-privileged records responsive to your Request No. 1 within its possession, custody or control. The responsive documents are being provided with this response letter. This completes the City's response to your Request No. 1.

REQUEST NO. 2: "Correspondence from the city to GHD"

DETERMINATION: The City has determined that it has non-exempt, non-privileged records responsive to your Request No. 2 within its possession, custody or control. The City is continuing its review of documents pertaining to your Request No. 2 and will provide non-exempt, non-privileged documents on a rolling basis until the response to the Request No. 2 is completed. The City anticipates producing a batch of responsive records on or about April 30, 2021.

REQUEST NO. 3: "Correspondence with the Army Corps of Engineers regarding Federal Interest Determination (FID) report for Beach Boulevard (around 2015-2018)"

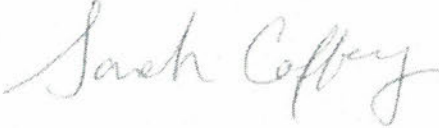
DETERMINATION: The City has determined that it has no responsive records to your Request No. 3 within its possession, custody or control. This completes the City's response to your Request No. 3.

REQUEST NO. 4: "Copy of Final FID report for Beach Boulevard (after September 2017)"

DETERMINATION: The City has determined that it has non-exempt, non-privileged records responsive to your Request No. 4 within its possession, custody or control. The City will produce the records on a rolling basis until the response to this Request No. 4 is complete. The City anticipates producing a batch of responsive records on or about April 30, 2021.

If you have any questions about the City's response or would like to discuss your request, please feel free to contact me at (650) 738-7307 or by email to: coffeys@ci.pacifica.ca.us.

Sincerely,

A handwritten signature in cursive script that reads "Sarah Coffey".

Sarah Coffey
City Clerk



City of Pacifica
City Clerk Department
170 Santa Maria Avenue
Pacifica, CA 94044
650-738-7307

RECEIVED

FEB 10 2021

Via email
CITY CLERK

REQUEST FOR PUBLIC RECORDS

Upon receipt of a request for City records, the City shall determine within ten (10) days if the records are accessible and available within the City's records systems and notify the requestor of such determination. In unusual circumstances, the City Clerk may notify the requestor that the time for the City's determination is extended for not more than an additional 14 days.

PHOTOCOPY FEE: \$0.25 cents per page, payable to the City of Pacifica

**NOTE: THE PUBLIC RECORDS ACT DOES NOT REQUIRE AN AGENCY TO
CREATE A NEW DOCUMENT OR RECORD TO RESPOND TO A REQUEST**

Requestor Name: Christie Boles

Address: [REDACTED]

City/State: Pacifica, CA Zip: 94044

Phone: [REDACTED] Alternate Phone: [REDACTED]

Email: [REDACTED]

DESCRIBE THE SPECIFIC PUBLIC RECORDS AND THE TIME PERIOD OF DOCUMENTS REQUESTED:

Documents related to the Beach Boulevard Resiliency Project
including:

- 1) GHD Contract
- 2) Correspondence from city to GHD
- 3) Correspondence with Army Corps of Engineers
regarding Federal Interest Determination (FID) report
for Beach Boulevard (around 2015-2018)
- 4) Copy of final FID report for Beach Boulevard
(after September 2017)

FOR OFFICIAL USE ONLY			
Date of Request: <u>2/10/2021</u>	Date Due: <u>2/22/2021</u>	Date Requestor Notified: _____	
Date Requestor Notified of Extension: _____		Number of Copies: _____	Copy Fee: _____
CITY ATTORNEY REVIEW AND APPROVAL: _____			

Montemayor, Joshua

From: Wehrmeister, Tina
Sent: Wednesday, June 9, 2021 5:52 PM
To: Montemayor, Joshua
Subject: FW: Comments on BBIRP

Tina Wehrmeister
Planning Director/Asst. City Manager
City of Pacifica
650.339.3978
www.cityofpacifica.org

From: Stan Zeavin [REDACTED]
Sent: Wednesday, June 9, 2021 5:10 PM
To: Beckmeyer, Sue <beckmeyers@ci.pacificaca.us>; O'Neill, Mike <o'neillm@ci.pacificaca.us>; Vaterlaus, Sue <vaterlauss@ci.pacificaca.us>; Bier, Mary <bierm@ci.pacificaca.us>; Bigstyk, Tygarjas <bigstyk@ci.pacificaca.us>
Cc: Woodhouse, Kevin <kwoodhouse@pacificagov>; Wehrmeister, Tina <twehrmeister@pacificagov>; O'Connor, Bonny <boconnor@pacificagov>; Marquez, Ryan <marquezz@ci.pacificaca.us>; [REDACTED]
[REDACTED] Julia Koppmannorton [REDACTED]; Stephanie
Rexing [REDACTED]; [REDACTED]
Subject: Re: Comments on BBIRP

[CAUTION: External Email]

Dear Madam Mayor and Council,

I am angry.

By imposing the constraints of an LCP that has NOT been certified by the State, Council made it nearly impossible for any contractor to find us a solution that will meet state requirements for approval. That will make funding much less probable.

By refusing to consider managed retreat or infrastructure realignment Council forced GHD to equate managed retreat to the "no project" scenario which in fact was defined as a plan to remove the existing seawall, retaining wall and revetment and would cause untold grief and harm. The two are in no way equivalent.

Doing nothing for west Sharp Park is clearly not an option, but whatever we do MUST consider the people, the future realities of sea level rise and finance. In addition to Sharp Park there will be erosion and flooding impacts along all six miles of our Pacifica coast.

Tonight's new hybrid project - half-mile long, bigger, deeper, higher fifty-year wall - seems to be intended primarily to enable a failed forty year old plan for Sharp Park economic development. Perhaps it's time to reconsider.

Why not look at the option of replacing only the more vulnerable retaining wall north of the pier to provide temporary protection to allow us to work out a plan to move the pumps and eliminate the need to detour all that sewage from north of Mori Point down to Beach Boulevard and then pump it back up to Palmetto away from the threat of the ocean. Moving the pumps inland away from Beach Boulevard will ultimately be necessary no matter how diligently DPW does repairs.

Bigger storms and water rising more quickly are predicted. If this Council chooses to pretend that sea level can't rise more than two feet in the next fifty years they are creating more potential risk for future Pacificans.

Through the limitations imposed on GHD, Council has cheated us of their expertise and the opportunity to reasonably consider how our town can be truly resilient and sustainable and survive beyond just the immediate future.

We are between a rock and a hard place and ultimately need to discuss the serious erosion and flooding effects of sea level rise on all the lands of our small town. We could discuss how to preserve the green hills we all love and how to nurture a city that could sustain itself between the two.

Sure we can hope for the best but, please, we must also plan for the worst.

Thank you for your attention,

Margaret Goodale

On Tuesday, June 8, 2021, 08:31:26 PM PDT, Stan Zeavin [REDACTED] wrote:

City Council
Pacifica, Ca.

PACIFICA BEACH BOULEVARD INFRASTRUCTURE ALTERNATIVES

Dear Members of the Pacifica City Council,

I wish to address several issues in your BBIRP which concern me.

Why is the city council choosing to ignore for the next 50 years the most important infrastructure problem in Sharp Park, the reconfiguration of the sewer system?

The city council stated in the new LCP, in opposition to the California Coastal Commission (CCC) guidelines and suggestions, that there will be no landward relocation (managed retreat) solutions.

Consequently, the only actual remaining solutions left are the various forms of hard armoring and living shorelines (sand nourishment, reefs, etc.) which greatly limited the consultants (GHD) project choices. Any plans for the sewer system are banished until the next LCP, whenever that is (20 – 40 years?). Although tipping points are mentioned, without an associated plan it could be many, many years before a plan is developed and building completed. That could be a very long time for those in harms way.

The various walls being discussed are limited by the 2 foot sea level rise (SLR) parameter in the report. A half decade ago, the Moffatt and Nichol report, authorized by Pacifica, was using 5½ feet of SLR to the end of the century. Most recent studies by various scientific groups are suggesting from 4' to 15' of SLR by the end of the century. **By not looking at various scenarios over 2', is this LCP, as presently written, creating a possible high risk situation for the people living on Beach Blvd?**

The life expectancy of the wall or the hybrid wall is supposedly 50 years, or, once built, should last until 2075. The city has stated that they will deal with the Sharp Park sewer system near the end of the wall's life. Why wait so long considering the wall is being justified for the protection of the sewer system? **The real reason for the wall is to get new development to commit to build new housing, hotels and a downtown in a flood zone.**

Another concern is the sand nourishment in the hybrid configuration. It is going to be a thin layer of sand in front of the rock revetment. About 6 years ago, a sediment study group, authorized by the state and consisting of the Army Corps of Engineers (ACE), with scientists, engineers and politicians from San Francisco and San Mateo Counties. This study group estimated that sand nourishment along the Pacifica coastline, could last from 5 to 15 years depending on the angle of the coast to the direction of the tide. There doesn't seem to be much chance that the thin layer of sand will last 15 years, or that the city will be able to get away with just 2 more nourishments. It is well known that with armoring and revetments, the sand will be washed away much more quickly than if it was part of a living shoreline. **There is a big possibility that the city will abandon sand nourishment because of the additional cost. The city will be left with no beach, a wall and a stack of rocks.**

Lastly, what if we can't raise the money for this massive project? **Why is there is no secondary plan?**

Why is the city council not thinking long term? Why is the city council spending all this money in Sharp Park thereby shorting the rest of the city?

The wall and hybrid system is a short term solution to a long term problem. The Sharp Park pump serves over 16 thousand residents while the homes immediately behind the wall consists of less than just 6% of the people in Pacifica. The vast majority of the residents in Pacifica north of Mori Point would best be served by a temporary fix of the north part of the wall to allow for planning

for and moving the pump station and associated sewer lines. **The city would have an easier time finding money for that infrastructure project.**

Beyond Sharp Park, other areas of the city need attention too. The homes in west Linda Mar, which are below sea level, and the homes above our crumbling cliffs are just two examples.

There are several alternatives to a fifty year wall. Among them is to buy all the shore side homes with the help of the state (there is a bill pending that will help to do just that). The city can then rent the homes until they are no longer usable.

I strongly urge the city council to allow GHD leeway to include alternatives not limited by our LCP. The project is too short sighted. In the case that money for the wall is not forthcoming or if the CCC doesn't accept the present choices, then what?

Stan Zeavin



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