

Public Comments

Agenda Item 5

Written Comments Received After 12pm on 11/22/2021



November 22, 2021

City Council Meeting

From: Christine Boles [REDACTED]
Sent: Monday, November 22, 2021 6:25 PM
To: Public Comment; _City Council Group; Murdock, Christian; Woodhouse, Kevin; Wehrmeister, Tina
Subject: Re: Comment on Agenda Item 5, Local Hazard Mitigation Plan
Attachments: Boles letter re.Multi-Hazard Risk Assessment 11.21.21b.pdf

[CAUTION: External Email]

I just realized that a paragraph of my letter about the home at 1112 Palmetto on page 4 disappeared when I converted the letter to a pdf. Please find the corrected version attached.

Christine Boles, Architect

Beausoleil Architects

[REDACTED]
[REDACTED]
[REDACTED]

www.beausoleil-architects.com

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

On Mon, Nov 22, 2021 at 12:40 PM Christine Boles [REDACTED] wrote:
Document notes, hopefully legible enough!

Christine Boles, Architect

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

On Mon, Nov 22, 2021 at 12:39 PM Christine Boles [REDACTED] wrote:

Please see attached letter. I will send my plan markups separately as the file is quite large.

Thank you,

Christine Boles, Architect

Beausoleil Architects

[REDACTED]

[REDACTED]

[REDACTED]

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

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.

DATE: November 22, 2021

TO: Pacifica City Council
City Manager Woodhouse
Assistant City Manager Wehrmeister
Deputy Planning Director Murdock
Chief of Police Steidle



RE: Multi-Hazard Risk Assessment, Consent Agenda item 5

Dear Council Members and staff,

As you can see from my letter on page 289 of your agenda packet, I have already spent a considerable amount of time analyzing the San Mateo County Multi-Hazard Risk assessment as it pertains to Pacifica. I reviewed the revisions this weekend and while I appreciate some of the changes that staff incorporated as a response to public comments, I still have concerns about the accuracy of some of the information in the revised report. I would ask you to pull the item from the consent agenda so that we the public can hear from staff and engage in some dialogue with you all about whether some other edits/clarifications might be needed. If your vote on accepting the document can be delayed, my preference would be to move this item to a future agenda allowing time for a more thorough review. As this report and process pertains to council priorities of ensuring public safety, building public engagement and rebuilding public trust, I would hope that you would see the value of an open discussion and partnership with the community on these important issues. The importance of having an accurate document that shows a deep understanding of the many natural hazards we face in Pacifica and the necessary mitigation steps to both prevent and respond to inevitable environmental catastrophes cannot be overstated.

I see that the draft response that you are reviewing as part of today's agenda that has not yet been approved by Council has already been submitted to the County as it posted on their [website](#). This seems very odd. I'd also like to point out that the Wildfire Hazard Severity Map is missing from both your agenda and the county website, so I question whether this incomplete draft can be adopted today.

I also wanted to ask if there was a draft of the General Plan Safety Element that I could see now? As according to the City Manager, you are going to release that draft next month, surely there is additional technical information in this new draft that relates to this hazard mitigation plan which would help better inform this document.

Attached are my red marks with suggestions and corrections to several pages current draft. Sorry, these are a bit sloppy, I am trying out a new document annotation method and am still getting used to the technology.

I would like to start by responding to staff responses to public comments, found starting on packet page 352.

Item 1 – Landslide Risks

Given our history, that in the winter of 1982/83 alone Pacifica was subject to 475 landslides, with multiple area evacuations for days due to the risk of saturated hillsides and flooding, which also led to the tragic deaths of three children, I am glad to see that the city recognizes this as the highest-ranked hazard in table 14-2.

While some commenters focused solely on Linda Mar Woods, which is in a high landslide susceptibility area, so the concern there is very real, I am not asking for property specific level assessment here as the staff response claims, but a robust assessment of landslide hazards that can be used as part of general planning for the entire city.

I have pointed out to Council and Planning Staff multiple times in the last year, including exactly one year ago in public testimony as part of the Vista Mar City Council appeal hearing, that Pacifica's General Plan and Safety Element do not address these hazards. The Howard Donnelly Report of 1983 which informed the Safety Element update, specifically said that Pacifica's landslide maps were inaccurate for the type of shallow surficial debris flow landslides Pacifica is most subject to. The report called for new landslide maps to be created back in 1983, almost 40 years ago. The 2014 Draft General Plan Safety Element posted on the city website still does not address these landslides as I previously documented to you all in several letters and emails.

If the city is actually working on a proper update to the Safety Element now, which is supposedly soon to be released for public review with other General Plan documents, then surely there must be better information available that we can refer to analyze and mitigate our landslide risks. The state USGS has recently come out with new interactive [landslide maps](#) that appear to address debris flow landslides, so we have better tools available to us right now to address gross planning for these type of disasters. These maps should also start to be used immediately to inform our review of development applications as there are several pending currently being reviewed that are on hazardous sites, including

- A) The home on Talbot on a site with mostly 100% slope that has already come before the Planning Commission once this fall 2021
- B) Pacifica Highlands, which is on a fast-track SB 330 application due to be complete by February of 2022. Project plans shows two areas with historic landslides, cutting right through proposed new roads and structures.
- C) And of course, this Council majority approved the Vista Mar project in late 2020, on a site with a 52% average slope with a history of landslides, some noted as active, using a geotechnical report that had no recent borings in the area where the buildings were proposed. The test pits to analyze these landslides that were required in 1991 as part of the William Cotton geotechnical peer review for a very similar project by the same engineer, were never done.
- D) Linda Mar Woods, which is also in an area with high landslide risk.

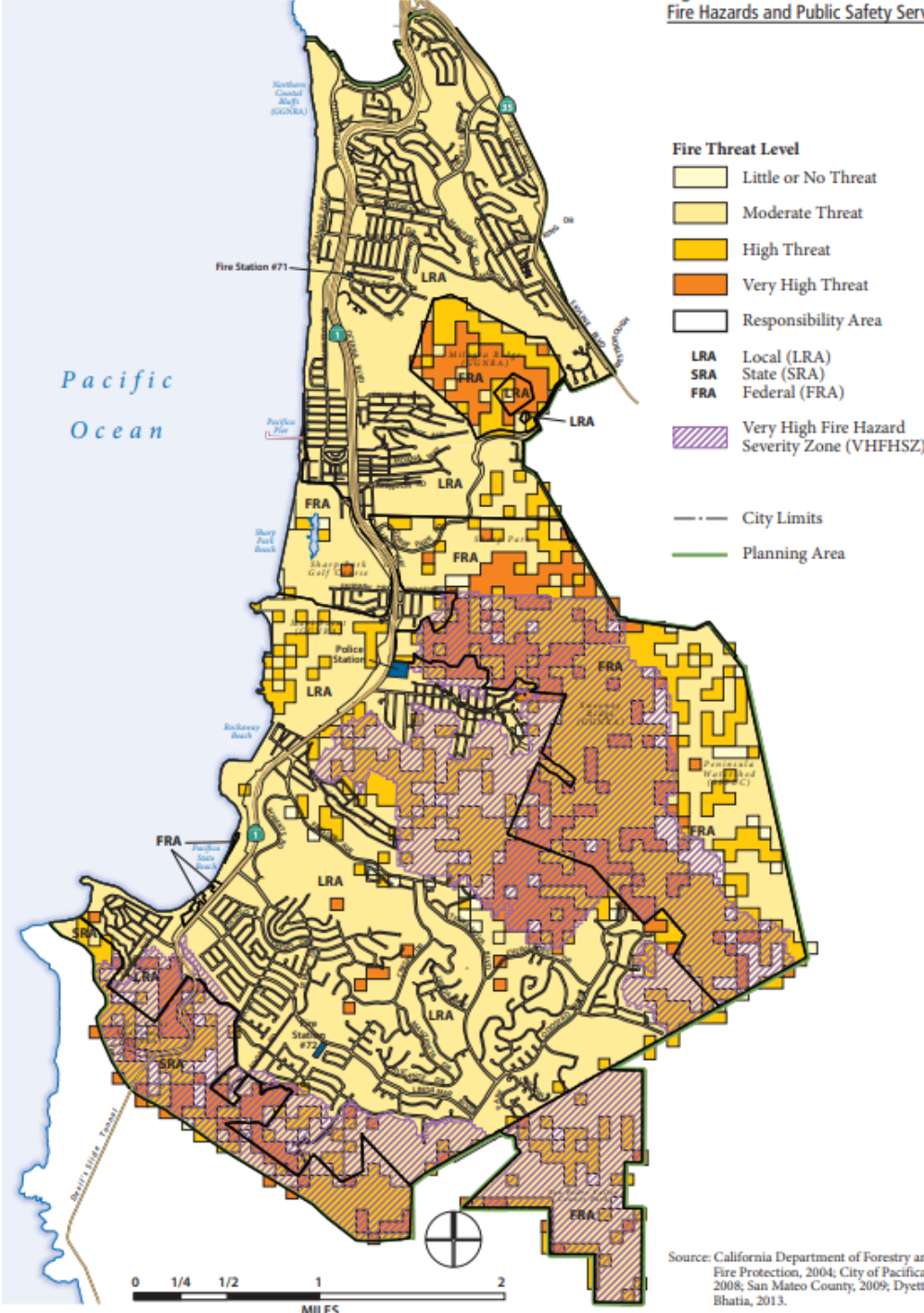
Notwithstanding our fatally out of date General Plan and Safety Element, our current planning processes do not sufficiently protect the public from landslide and flooding risks, and that is the core reason the city is currently being sued over this project's approvals. We need a major overhaul of not only our General Plan and ordinances, but our planning policies and procedures to ensure the public is protected and that the city is protected from the financial losses in case of hazardous construction and bankrupt developers who leave us to pick up the pieces.

I am glad to see our Hillside Preservation Ordinance added to the hazard document, as item b under the very first paragraph about the intent of the ordinance in Article 22.5 of our Municipal Code specifically says *to "Help protect people and property from all potentially hazardous conditions particular to hillsides;"* As you are aware from public and Planning Commissioner requests, making sure our HPD ordinance is properly reviewed and enforced requires discussion. I have recently obtained historical project documents that show the ordinance was properly applied to projects in the past; we can easily learn together from these documents and improve our processes moving forwards if Council would allow the time for an open discussion in a study session. I have also offered several times to meet with the City Manager as well as planning staff on these issues and am still very willing to do so.

2. Wildfire Risk

As previously stated, the document you are scheduled to approve today appears to be missing the Fire Risk map. As Pacifica residents Cindy Abbott and James Kremer so eloquently analyzed in their comments, wildfire risk does not magically change at a city border. As we saw in the recent CZU fires in the coastal zone with an identical climate to Pacifica, our risks have increased substantially with climate change in the past decade. Parts of Pacifica, especially our southern border is filled with very flammable eucalyptus, is indeed a high fire risk area. Our own 2014 General Plan Safety Element notes this area and several other areas of Pacifica as Very High Fire Severity Zones. See image below. The fire risks in Pacifica are not uniformly "medium" as proposed in the current document revisions.

Figure 8-5:
Fire Hazards and Public Safety Services



And should we not consider planning for increasing fire danger due to climate change? Perhaps new developments adjacent to open spaces should be held to stricter state Wildland Urban Interface requirements to protect both people and firefighters? Many Bay Area cities already incorporate WUIZ fire codes.

And at what point is the Fire Department brought in to review projects in fire hazard zones? Recent examples:

- A) The home on Talbot on a site bordering Milagra open space came before the Planning Commission this fall 2021. The drawings contained errors with relation to fire hose path lengths and the lengths exceeded state code maximum requirements of 150 feet. This non-compliance should have required special exceptions from the Fire Marshall, which were not addressed in the staff report.
- B) Pacifica Highlands, which is on a fast-track SB 330 application due to be complete by February of 2022 I believe. The current notice of incomplete states, *“A secondary egress route may be required. Additional consultation with North County Fire Authority is required prior to approval.”* I am shocked that this basic issue of site access has not been resolved at this stage. On one of my current architectural projects, on a 69 acre site next to open space in Santa Clara County, the application is not deemed complete and yet the fire department has already given detailed feedback as to road design and water capacity. We have even had to add a new 60,000 water storage tank as a backup firefighting source as part of the initial planning review.
- C) Linda Mar Woods - the long one-way road does not meet state fire or basic Pacifica city standards. Is the project even remotely viable?

Pacifica can and must do better in ensuring projects are safe from fire hazards with proper agency coordination and review early on.

3. Coastal Erosion and Building Condemnation

I have marked up packet page 402 with several other hazard events and building removals that are not included in the report. I have not done extensive research, so others are likely missing.

Staff response states that *“The City has declared one additional building as unsafe for occupancy that is not included in Table 14-11 – the property at 1112 Palmetto Avenue. However, the building owner is continuing efforts to obtain approval from the California Coastal Commission to protect the property from further coastal erosion and the building has not been demolished.”*

Based on my research and recent correspondence on November 5, 2021, City staff and Council are aware that the owner of 1112 Palmetto has not worked with the Coastal Commission since 2016 when they received a temporary permit for armoring. This permit has expired and the armoring they did is now illegal. This documentation is all in the real estate listing disclosure papers that I attached in this email. The Coastal Commission had filed several violation notices on the property, including one as recently as last month. On Friday November 12th, I asked Coastal Commission staff in an email who takes authority to ensure a building is removed or moved before it becomes public danger and ocean environmental hazard? Here is the response I obtained from Jo Ginsberg, the Coastal Commission’s Enforcement Analyst.



Ginsberg, Jo@Coastal <Jo.Ginsberg@coastal.ca.gov>
to Stephanie@Coastal, me, Julia@Coastal, Pat@Coastal ▾

Christine,

I believe the City of Pacifica is the entity that would deal with public safety issues such as exists at the subject site.

--Jo

Jo Ginsberg
Enforcement Analyst
California Coastal Commission
415-904-5269
jo.ginsberg@coastal.ca.gov

So, what are our policies for coastal hazard removal? What are the triggers by which a structure is deemed uninhabitable and a public danger? And who pays for the removal? There are other buildings near the cliff edges too, such as 1044 Palmetto, where the building is now only about four feet from the edge. One major storm could send the foundations over the edge. The city's responses in this document seem to be severely lacking in analysis and mitigation planning related to coastal erosion and sea level rise.



I have a client meeting now and do not have the time complete my response.

Again, I encourage the City Council to take public input tonight and to complete a proper update of this important document, which should also feed into the update to the General Plan Safety Element. Thank you.

Sincerely,

Christine Boles, Architect
Principal

