

The City of Pacifica released various deliverables during the Adaptation Plan phase of this sea level rise planning effort, each of which had their own comment period. The deliverables and associated comment period are detailed below:

- Introduction to Adaptation Strategies Memo (April 19 to May 3)
- Economic Analysis Methodology Memo (May 4 to May 17)
- Alternative Adaptation Memo (May 30 to June 7)
- Preliminary and Final Draft Adaptation Plan (June 19 through August 29)

A total of 118 comment letters were received during the Adaptation Plan phase. Table K-1 summarizes the comment letters received.

Table K-1: Summary of Comments Received

Group	Letter #	Name
<i>Introduction to Adaptation Strategies Memo (Comment Period: April 19 to May 3)</i>		
Community Work Group	1	Gordon Tannura
	2	Eileen O'Reilly
	3	Jim Steele
	4	Jim Steele
	5	Sam Casillas
	6	Lindsey Bales
	7	Connie Menefee
	8	Jim Kremer
Public	9	Jessica Pressman
	10	Stan Zeavin and Margaret Goodale
	11	Cheryl Greene
	12	Alan Greene
	13	Carol Zammit
	14	Jessica Pressman
	15	Jason Pressman
	16	Richard Harris
<i>Economic Analysis Methodology Memo (Comment Period: May 4 through May 17)</i>		
Community Work Group	17	Cindy Abbott
	18	Gordon Tannura
	19	Jim Kremer
	20	Ron Maykel
	21	Sam Casillas
	22	Lindsey Bales
	23	Eileen O'Reilly
	24	Maureen Garcia
Technical Work Group	25	San Francisco Recreation and Parks Department

Table K-1 (Cont.): Summary of Comments Received

Group	Letter #	Name
Public	26	Amy Caplan
	27	Brad and Julie Wahrlich
	28	Richard Harris
	29	Richard Harris
<i>Alternative Adaptation Memo (Comment Period: May 30 through June 7)</i>		
Community Work Group	30	Lindsey Bales
	31	Maureen Garcia
Public	32	Kathleen Moresco
	33	Sue Schectman
	34	Jim Wagner
	35	Brad and Julie Wahrlich
	36	Gina Zari
	37	James Steele
	38	Richard Harris
	39	John Peterson
	40	Charles Gust
<i>Preliminary and Final Draft Adaptation Plan (Comment Period: June 19 through August 29)</i>		
Community Work Group	41	Sam Casillas
	42	Gordon Tannura
	43	Jim Kremer
	44	Ron Maykel
	45	Connie Menefee
	46	Robine Runneals
Technical Work Group	47	Coastal Commission
	48	San Francisco Recreation and Parks Department
	49	Coastal Commission
Public	50	Sue Eldredge
	51	Matthew Koester
	52	Tony Sladel
	53	Allison West
	54	Suzanne Moore
	55	Amy Caplan
	56	Amy Caplan
	57	Mark Duane
	58	Amy Caplan
	59	Laurie Goldberg
	60	Pat Kremer
	61	Matt Lanier
	62	John Murphy
	63	Roy Stotts
	64	Allison West

Table K-1 (Cont.): Summary of Comments Received

Group	Letter #	Name
	65	Julie Thomas
	66	Deborah Gold
	67	Bridget McKenna
	68	Victor Carmichael
	69	Michael Richards
	70	Greg Blackburn
	71	Jeffrey Bruno
	72	Jeff Guillet
	73	Jay Crawford
	74	Chris Redfield
	75	Various Signatures
	76	John Negley
	77	Linda Acosta
	78	Lauren Blac
	79	Judy Borland
	80	William Bradford
	81	Amy Caplan
	82	Debbie Durham
	83	Suzanne Gauci
	84	Margaret Goodale
	85	Marianne Grandon
	86	Michael Grandon
	87	Norma Hilton
	88	Sean Keane
	89	Jim and Debbie Kimball
	90	Shirley Lorence
	91	Lori Martin
	92	Michael Martin
	93	Kevin McClusky
	94	Ryan Grimm
	95	Delia McGrath
	96	Dennis Miralda
	97	Stephanie Meyer
	98	Marie Miralda
	99	Eric Myhres
	100	Pot Nuntavong
	101	Andrew and Kerry Patterson
	102	Jeff Guillet and Dan Peknik
	103	Mike and Barbara Reynolds
	104	Thursday Roberts
	105	Ramon Christopher Rodriguez
	106	Linda Roiz
	107	Steve Sinai
	108	Sandy Slick

Table K-1 (Cont.): Summary of Comments Received

Group	Letter #	Name
	109	Janet and Ken Talsky
	110	No Name
	111	Stan Zeavin
	112	Vinh DePaul
	113	Celeste Langille
	114	Cristal Barrera
	115	Raul Barrera
	116	Peter Loeb
	117	Stephanie Dudum
	118	Richard Harris

The following sections provide Master Responses and responses to the individual comments. Marked up comment letters are provided at the end of this appendix.

Master Responses

Master Response A: Managed Retreat

First, the public should keep in mind that the analysis and recommendations in the Adaptation Plan is not policy, but only the background information to inform policy development. The next phase of the planning effort, the Draft Local Coastal Program (LCP) Policies, is when policies are drafted for incorporation into the Draft LCP. At the time of the release of this document, Draft LCP Policies were released to the public. The Draft LCP Policies do not include managed retreat, but does include a policy that would require monitoring and reassessment of policies in the future.

The grant agreement entered in to by the Coastal Commission and the City of Pacifica details the tasks that the City will complete using the funds provided by the Coastal Commission. Under the terms of the grant agreement, the City has agreed to evaluate certain strategies and compare how the strategies address vulnerability and risk. The Final Draft Adaptation Plan seeks, among other things, to meet the City's obligations under the grant agreement.

Additionally, the Final Draft Adaptation Plan analyzes managed retreat as a voluntary strategy for private property owners. The Final Draft Adaptation Plan evaluates managed retreat if property owners determine protection of their property is not a viable option.

Master Response B: Public Outreach and Notification

A Stakeholder Engagement Plan was prepared at the start of this planning effort, based on interviews with various stakeholders, to identify intended stakeholder engagement objectives for the LCP Update and outline the specific stakeholder engagement activities that will be implemented to achieve those objectives. The identified stakeholder engagement activities include:

- **Community Work Group.** The Community Work Group members were selected, in part, based on their ability to reach out to their affiliated community groups, neighbors, and other hard to reach stakeholders on behalf of the City.
- **Technical Work Group.** The Technical Work Group members were invited to provide a venue for productive interagency coordination and collaboration.
- **Public Workshops.** Public workshops are to educate stakeholders on the LCP Update specifically, and coastal flooding and erosion issues in Pacifica generally, and to gather public input to inform the development of the LCP Update. Workshops are open to the public and begin with a presentation designed to educate participants on relevant topics, followed by a structured exercise to solicit input.
- **Public Outreach, Education and Notification.** The City has used several public outreach methods to inform the public of the City's sea level rise planning effort. These efforts include:
 - Public meetings
 - Continuous updates to the sea level rise webpage (www.cityofpacific.org/sealevelrise)
 - Continuous updates to the sea level rise mailing list (310 recipients)
 - Regular mentions in Connect with Pacifica e-newsletter (3,225 recipients)
 - Multiple mentions from the City and CWG members in the Pacifica Tribune
 - Multiple posts on NextDoor
 - Multiple discussions at City Council meetings
 - Posting public meetings on YouTube
 - City Wide Mailer
 - Staff present at special events to specifically talk about this topic
 - Highway 1 electronic message sign
 - Business cards
 - Postings at Planning Department

Master Response C: Concerns from Fairway Park West Residents

The Coastal Zone was established in the Coastal Act and represents the jurisdictional boundary of the Coastal Commission. All properties west of Highway 1 generally compose the Coastal Zone in Pacifica. The Coastal Zone is broken up into seven subareas in the existing Draft LCP, which covers various topics beyond adapting to sea level rise. When staff and ESA started the sea level rise planning effort, the established subareas were reviewed and most were considered appropriate for this study. The one exception was the West Sharp neighborhood. Staff believed that it was more appropriate to combine the portion of the West Sharp neighborhood along the public sea wall and retaining wall with the Sharp Park Golf Course, West Fairway and Mori Point subarea. This decision was made because this entire stretch of shoreline is publicly owned and fully government owned shoreline may have different policy or funding considerations. Subareas were not created based on the potential of the area to be vulnerable to sea level rise. Furthermore relocating the subarea lines as the commenters suggest would not change the findings of the Vulnerability Assessment.

The Final Vulnerability Assessment can be found in Appendix A of the Final Draft Adaptation Plan. As shown in multiple locations in the Final Vulnerability Assessment (most notably on Page 53 of the Final Vulnerability Assessment), with the exception of the most western properties on Seaside Drive, most of the West Fairway Park area is not projected to be vulnerable to sea level rise through year 2100. The adaptation strategies analyzed in the adaptation plan do not apply to properties that are not found to be vulnerable to sea level rise. Language was added to Section 1.1 of the Final Draft Adaptation Plan to clarify this point.

For the few West Fairway Park residents located within the projected storm flood area by 2100, the Final Draft Adaptation Plan recommends protection and armoring adaptation strategies and only suggests voluntary managed retreat as a last case scenario. West Fairway Park is not designated for managed retreat, as its exposure to future storm flooding with 0 to 6 feet of sea level rise could be effectively managed with a levee along the SFGC boundary and stormwater basin/pump. The public should keep in mind that the analysis and recommendations in the Adaptation Plan are not policy, but only the background information to inform policy development. The next phase of the planning effort, the Draft Local Coastal Program (LCP) Policies, is when policies are drafted for incorporation into the Draft LCP. At the time of the release of this document, Draft LCP Policies were released to the public. The Draft LCP Policies do not include managed retreat, but does include a policy that would require monitoring and reassessment of policies in the future. Please also see Master Response A regarding managed retreat.

Master Response D: Ecological Values

San Francisco Department of Recreation and Parks, which owns the Sharp Park Golf Course, as well as a number of Pacifica residents, suggested that a habitat value be applied to land lost due to erosion at the Sharp Park Golf Course under Alternative 3. However, only considering the habitat value under Alternative 3 would result in an unequal consideration of ecological impacts compared to the other adaptation alternatives. Alternative 1 would result in greater beach habitat loss, which is also considered a valuable ecology (Dafeo et. al. 2009; Dugan et. al. 2006). Alternative 2 would result in construction-period impacts on beach ecology. Therefore, there are ecological tradeoffs associated with the response to sea-level rise. Economic valuation of ecology (wetland, beach, etc.) is not within the scope of this study, but we agree that Pacifica or other public agency or landowner may wish to consider ecology in their adaptation planning. The adaptation plan was amended to incorporate a broader discussion of beach and wetland ecological value and associated sensitive species. A discussion of the potential range of economic values associated with wetland and beach habitats is now provided in the adaptation plan report section Sensitive Habitats on page 71.

Master Response E: Sensitivity of Beach Recreation Value and Beach Attendance Estimates

Several comments on the Final Draft Adaptation Plan questioned whether the valuation of beach visitation, \$40/day per person-visit, was too high and whether a lower value might result in a different assessment of alternative net costs. In particular, commenters opined that a lower value should be used because the beach in front of Sharp Park has dangerous waves and other negative conditions, adding that a lower beach valuation would facilitate funding for coastal armoring. These commenters also emphasized that the number of people using the beach was very small, lower than the estimates used in

the adaptation study. In response to these concerns, a review of the economic estimates/projections was conducted using the Sharp Park subarea, and a sensitivity analysis was applied using a lower day-use value (\$10/day per person-visit). The adaptation analysis did not separately assess pedestrian uses of the berm walkway because we assumed that a shoreline walking trail would be maintained for all alternatives.

A review of the prior analysis (with \$40/day per person-visit) indicates that the recreational value of the beach was estimated/projected to be the same for all alternatives in 2018 and 2050 (in Table 26 of the report). In this case increasing or reducing the value of a beach day (e.g., from \$40 to \$10) would make no difference in the relative ranking of alternatives. By 2100 under Alternative 1, the beach erodes to the point where recreational value declines relative to other alternatives (Alternative 2 consists of armoring and beach nourishment and Alternative 3 consists of managed retreat).

Using the lower beach valuation (\$10/day per person-visit) does not change the rankings, even for year 2100 where the beach is estimated/projected to be significantly reduced for Alternative 1- Shoreline Armoring (Table 27). Using the \$10/day per person-visit, the total recreational benefits are now \$13.4 million for Alternative 1, and \$19.1 million for Alternatives 2 and 3. The net benefits for Alternative 1 is now -\$99.4 million, Alternative 2 is now -\$203.8 million; and Alternative 3 is now -\$57.1 million. Consequently, even for a much lower (or even zero) valuation for beach recreation, Alternative 3 has the highest net benefits.

In summary, lowering the value of a beach day, or lowering attendance, would not change the rank ordering of the alternatives economics results as shown by comparison of Table 26 and Table 27 in the report. Note that the effect of lowering the beach value by a 75% yields the same result as lowering attendance by 75% or reducing both attendance and unit value by 50%. Further, the US Army Corps of Engineers can consider the beach recreation as a factor in assessing a Federal interest in cost-sharing beach nourishment projects. Therefore, estimating recreational value a beach using a lower day-use figure would potentially lower the benefits for a nourishment project since the recreational value would be 75% lower. Finally, it is the economist's professional opinion that the \$10/day per person visit is too low and we do not recommend using this value.

Introduction to Adaptation Strategies Memo

Community Work Group

1. Gordon Tannura

1. The reason the terms "retaining wall" and "seawall" are both used to describe the structures along Beach Blvd. is because the structure located north of the pier is a retaining wall and the structure located south of the pier is a seawall. These structures were engineered to provide different functions. A retaining wall is designed to hold the landward earth in place. A sea wall is designed to prevent the sea from encroaching on or eroding an area of land. Page 29 of the Final Draft Adaptation Plan mentions the City's current plans to upgrade Beach Blvd. retaining wall to a seawall.
2. San Francisco recently received Coastal Commission approval (CDP Application No. 2-17-0702) to conduct maintenance and improvements to the berm. The City of Pacifica has no jurisdiction

over the evolution of the berm, however the sea level rise policies included in the LCP update will record Pacifica’s adaptation preferences for the area.

3. Page 41 and Table 5 in the Final Draft Adaptation Plan provides a description offshore sand retention structures, their suitability for each subarea, and general pros and cons of the adaptation alternative. The Final Draft Adaptation Plan identifies adaptation measures at a conceptual planning-level of detail. A discussion of what would need to be done to obtain regulatory approval of an adaptation strategy would be discussed at the project level planning phase.
4. The Subarea Adaptation Recommendations in Section 4.1 of the Final Draft Adaptation Plan clearly states a private property owner’s role and responsibility for implementing adaptation strategies for their property.
5. Chapter 5 of the Final Draft Adaptation Plan provides the supporting information for the Adaptation Plan, including development of alternatives, cost-benefit analysis methodology and results. This process was further broken down and discussed through the Introduction to Adaptation Strategies Memo, Economic Analysis Methodology Memo, and Alternative Adaptation Memo and their associated public meetings.
6. Meeting materials and a link to the video recording of the meetings were uploaded to the www.cityofpacifica.org/sealevelrise webpage shortly after each meeting.
7. The City has been using various media to advertise the City’s Sea Level Rise planning effort, including NextDoor and Connect with Pacifica. One of the purposes of creating the Community Work Group was to have the members enhance public awareness of this effort through their community groups, neighbors, NextDoor, Facebook, or other social media accounts.

2. Eileen O’Reilly,

1. Your comment is in the record.

3. Jim Steele

1. Your comment is in the record. Please see Master Response A regarding managed retreat.
2. Your comment is in the record. Analysis of the sediment transport is beyond the scope of this planning effort.
3. Your comment is noted. The creation of unique hazard data for Pacifica is beyond the scope of this conceptual planning –level effort. Unique data will be created for the project level planning phase.
4. The study grant requires that the study considers the high-sea level rise scenario studied for the San Mateo County SeaChange. Furthermore, it is in the best interest of the City and public safety to study and develop contingency plans for the potential worst case of sea level rise, not the potential “best” case. Adaptation Plan puts forth triggers for action, depending on the amount of sea level rise or erosion (with or without sea level rise) occurs.

4. Jim Steele

1. Your comment is in the record. Since this comment was not directed to the City, no response was provided.

5. Sam Casillas

1. Your comment is in the record. Since this comment was not directed to the City, no response was provided.

6. Lindsey Bales

1. Your comment is in the record. The City's current General Plan, Local Coastal Land Use Plan, and zoning ordinance already define a process for the Transfer of Development Rights. There are areas of Pacifica that could be found appropriate to accept increased density, such as areas that are near transit. Development rights can be transferred to already developed areas of Pacifica as part of a redevelopment project and don't necessarily need to be transferred to undeveloped parcels.
2. Environmental impacts of the implementation of an adaptation project will be analyzed at the project level planning stage.
3. Some existing buildings can be adapted to sea level rise by elevating the structure, setting the structure back, water proofing the structure. Specific projects will be identified in the future in accordance with the adopted adaptation policies.
4. The Introduction to Adaptation Strategies Memo was prepared to identify all of the possible adaptation strategies that the City could use to adapt to sea level rise hazard, not to determine which adaptation strategies will be analyzed as part of this planning effort.
5. The purpose of this planning effort is to make the City more resilient to sea level rise hazards. The City's General Plan and Hazard Mitigation Plan also provide guidance on emergency planning.

7. Connie Menefee

1. Your comment is in the record. The Final Draft Adaptation Plan does evaluate the hybrid adaptation strategy that includes armoring and beach nourishment. This hybrid approach would help maintain the beach width while armoring the backshore.

8. James Kremer

1. Your comment is in the record.
2. The Final Draft Adaptation Plan includes all of you suggestions of timed adaptation strategies recommendations to address baseline sea level rise scenarios to projected high scenarios. The Final Draft Adaptation Plan also recommends hybrid adaptation strategies.
3. Please see Master Response D regarding ecological values
4. Beach width modeling has been clarified in the Adaptation Plan (now referred to as Shore evolution modeling), and Appendix E describes the modeling methodology.

Public

9. Jessica Pressman

1. Your comment is in the record.
2. Please see Master Responses A regarding managed retreat. The Revised Draft Residential Adaptation Policy Guidance released by the California Coastal Commission is the Coastal Commission's advisory guidance on how local governments can address sea level rise issues. The policies in the Revised Draft Residential Adaptation Policy Guidance document are not regulation. The City of Pacifica has not adopted this document nor is the City required to adopt those policies from the Guidance.

On April 30, 2018, the City Manager submitted a comment letter to the Coastal Commission regarding the Revised Draft Residential Adaptation Policy Guidance. The comment letter included, among other topics, a recommendation to expand engagement with residents and businesses prior to adoption of the guidance document.

10. Stan Zeavin and Margaret Goodale

1. Your comment is in the record. Please see Master Response A regarding managed retreat.

11. Cheryl Greene

1. The Introduction to Adaptation Strategies Memo was prepared to identify all of the possible adaptation strategies that the City could use to adapt to sea level rise hazard, not to determine which adaptation strategies will be analyzed as part of this planning effort.
2. Your comment is in the record.
3. The Final Draft Adaptation Plan was prepared to provide the necessary data and analysis to allow Pacifica to make an informed future decision on what adaptation policies would be best for the City of Pacifica. As mentioned in your comment and analyzed in the Final Draft Adaptation Plan, the adaptation strategies will impact tax revenues and city expenses.

12. Alan Greene

1. Your comment is in the record. The Introduction to Adaptation Strategies Memo was prepared to identify all of the possible adaptation strategies that the City could use to adapt to sea level rise hazard, not to determine which adaptation strategies will be analyzed as part of this planning effort.
2. Local Coastal Program policies to implement the final recommended concept-level adaptation strategies will be prepared in the next phase of this project (Draft LCP Policies). The Final Draft Adaptation Plan does include a cost analysis of the analyzed adaptation strategies.
3. Please see Response to Comments 11-1 through 11-3.

13. Carol Zammit

1. Please see Response to Comments 12-1 through 12-3.

14. Jessica Pressman

1. Please see Response to Comments 12-1 through 12-3.

15. Jason Pressman

1. Please see Response to Comments 12-1 through 12-3.

16. Richard Harris

1. Your comment is in the record.
2. Language has been modified in the Adaptation Plan to clarify that beaches have largely been lost where armoring has occurred on eroding shorelines.
3. Your comment is in the record.

Economic Analysis Methodology Memo

Community Work Group

17. Cindy Abbott

1. Your comment is in the record. As discussed in Section 5 of the Final Draft Adaptation Plan, the cost-benefit analysis is for planning purposes using prices and replacement costs in 2018 dollars. However, as is standard in any economic benefit/cost analysis, future costs and benefits were discounted using a 3 percent discount rate.
2. The pier is considered a recreational resource.
3. Data were not available for street lighting, electrical or gas and could not be developed in the scope of this study. This is stated in the adaptation plan section 5.3.

4. Tax information is public record in the aggregate, but not for individual businesses (out of privacy concerns). However, given the information provided by the City on transient occupancy taxes and sales taxes, it would be possible to estimate business losses for the city.
5. Your comment is in the record.

18. Gordon Tannura

1. As disclosed in Chapter 5 of the Final Draft Adaptation Plan, future economic conditions are evolving and unpredictable. The project's economist, Dr. King, has applied standard methods which are described in Chapter 5 of the Final Draft Adaptation Plan to estimate what the cost of a project may be in the future. However, Dr. King is unable to apply any quantitative degree of certainty of these costs.
2. This is an important consideration. Over the last few decades construction costs have outpaced the consumer price index. In a short term forecast, it might be reasonable to assume construction costs rise faster than inflation. However, over a longer time horizon (e.g., 2018-2100) these trends may or may not continue and over valuing one good (construction) implies undervaluing other goods (e.g., land, recreational values).
3. Costs to upgrade coastal armoring and flood protection structures are based on the conceptual engineering costs in today's dollars, and do not include future code upgrades.
4. The cost-benefit analysis in the Final Draft Adaptation Plan does include transaction cost as described on Page 72, which accounts for, among other things, appraisals of the property, utility shut-off, structure demolition and site clearing, and legal consultation. Additionally, the cost-benefit analysis accounts for impacts on tax revenues as well as City costs.
5. Table 14 of the Final Draft Adaptation Plan details the engineering cost assumptions.
6. A breakdown of cost assumptions for public and private projects was investigated, but the data was not adequately attributed with public/private designations and it was not possible to sift through the data at such a level of detail within our budget. .
7. The methodology to evaluate home prices was modified from the methodology detailed in the Economic Analysis methodology memo based on feedback received. Please see Page 68 of the Final Draft Adaptation Plan to understand the current methodology.
8. Please see Appendix G of the Final Draft Adaptation Plan to see the methodology for evaluating the Sharp Park Golf Course.
9. Gas and electric utilities are not included because data could not be obtained as stated in the Adaptation Plan.
10. Capital costs are included in Table 14 of the Final Draft Adaptation Plan, which details the engineering cost assumptions.

19. Jim Kremer

1. Your comment is in the record. See Master Response D regarding ecological values which are difficult to apply a cost value. Beach recreational values are discussed in Master Response E.
2. Your comment is in the record.
3. Historic erosion rates were added to Table 3 in the Final Draft Adaptation Plan in response to your comment.
4. The development of zoning policies is beyond the scope of this planning effort. After a new LCP is adopted, the City's Implementation Plan (zoning) will need to be updated to be consistent with the LCP. Suggestions for incentive would be best received during the update of the Implementation Plan.

20. Ron Maykel

1. As detailed on Page 72, trail usage counts were not available for any of the various trails along the coast. Additionally, apportioning a partial loss of a coastal trail usage is difficult. Because of these limitations, the Final Draft Adaptation Plan estimates the length of trail lost under each adaptation alternative (Table 40), but is unable to place a monetary value to it.

21 Sam Casillas

1. The City does not have sufficient data to estimate the economic impact of secondary spending associated with recreation opportunities in Pacifica. If one applied estimates that are used in southern California, the impacts would be quite large at Pacifica State Beach.

22. Lindsey Bales

1. Projects protecting private property will be implemented and funded by the respective private property owners. Publicly funded projects will be prioritized at the City Council's direction. City projects will be proposed in accordance with the final adopted LCP policies.

23 Eileen O'Reilly

1. The methodology for estimating property value is detailed on Page 68 of the Final Draft Adaptation Plan.
2. The hazard data that City is using to project the future hazards was publicly available prior to the City starting this effort.
3. It is not known if or how third parties will use the City's Local Coastal Plan and Adaptation Plan. However, it is important to note that the City is not creating new hazard data. The study is relying on existing hazard data produced by agencies such as such as the Federal Emergency Management Agency (FEMA) and State of California Ocean Protection Council. The hazard data used in the City's study is already readily available to the public and financial institutions and insurers.

24. Maureen Garcia

1. The Final Draft Adaptation Plan does consider various adaptation strategies for the various subareas, which would be implemented in various timeframes.
2. All data gaps cannot be filled in this study, but are noted in the reports.
3. See Master Response D regarding ecological values which are difficult to apply a cost value. Recreational values are discussed in Master Response E.
4. There is not sufficient data to include surfonomics in this study.
5. The City does not have sufficient data to estimate the economic impact of secondary spending associated with recreation opportunities in Pacifica. If one applied estimates that are used in southern California, the impacts would be quite large at Pacifica State Beach.
6. The Shoreview Neighborhood was always included in this planning effort as part of the Northwest Sharp Park subarea. Confusion of their inclusion of this planning effort stemmed from statements that the City is unable to fund improvements to protect private property. However, while the City will not fund the private property projects, the City will permit and support the permitting of projects in Shoreview neighborhood that are consistent with the LCP policies for the subarea.
7. See Master Response D regarding ecological values which are difficult to apply a cost value. Recreational values are discussed in Master Response E.
8. Table 14 of the Final Draft Adaptation Plan details the engineering cost assumptions.

Technical Work Group

25 San Francisco Department of Recreation and Parks

1. Please see Master Response D regarding ecological values. Additionally, a discussion of wetland values was added to Section 5.3 Sensitive Habitats.
2. There are a number of issues with using the real estate value for a golf course as a metric:
 - a. the market for coastal golf courses is thin and establishing a price would be difficult;
 - b. the loss evaluated here is only a partial loss of the course and pro-rating this real estate value by a value for an entire course may not be the best method.

Public

26. Amy Caplan

1. Your comment is in the record. Staff is unable to predict where or how federal, state, and county funding sources will prioritize their funding. However, staff believes that having an approved plan will be beneficial when competing for funds.

27. Brad and Julie Wahrlich

1. The Final Draft Adaptation Plan includes an analysis of the estimated impacts that the adaptation strategies will impact tax revenues and city expenses.

28. Richard Harris

1. Master Response E regarding sensitivity of beach recreation value estimates and beach visitation total to the general analysis.
2. The sources are cited the same way throughout this planning effort, which is consistent with standard literature citation guidelines (e.g. MLA and APA). We have many more citations in this memo than other similar studies on sea level rise adaptation and consider it a service to provide more background references.
3. Master Response E regarding sensitivity of beach recreation value estimates and beach visitation total to the general analysis.

29. Richard Harris

1. Master Response E regarding sensitivity of beach recreation value estimates and beach visitation total to the general analysis.
2. Master Response E regarding sensitivity of beach recreation value estimates and beach visitation total to the general analysis.
3. Your comment is in the record.
4. Your comment is in the record.
5. The valuation of the golf course was reconsidered. There are two primary issues with using the real estate value for a golf course as a metric: 1) the market for coastal golf courses is thin and establishing a price would be difficult; and 2) the loss evaluated here is only a partial loss of the course and pro-rating this real estate value by a value for an entire course may not be the best method.
6. Your comment is in the record. Please see response to Comments 29-1 through 29-5.

Alternative Adaptation Memo

Community Work Group

30. Lindsey Bales

1. Your comment is in the record. The Final Draft Adaptation Plan does analysis a beach nourishment adaptation strategy for Pacifica State Beach.

31. Maureen Garcia

1. No stormwater basins are located at Fairway Drive. There are stormwater pump stations in the area and their exact location can be viewed at <http://esanw.maps.arcgis.com/apps/webappviewer/index.html?id=16223f268d3e4e12a2831c40de64b369>.
2. Your comment is in the record.
3. Page 29 of the Final Draft Adaptation Plan mentions the City's current plans to upgrade Beach Blvd. retaining wall to a seawall.
4. Your comment is in the record.
5. The Sharp Park, West Fairway Park, and Mori Point sub area and all sub areas north of it, included analysis of an adaptation alternative with offshore sand retention structures in the Final Draft Adaptation Plan. The Final Draft Adaptation Plan does not identify offshore sand retention structures as a primary recommendation, but does note that the structures would increase the efficacy of beach nourishment.
6. A representative of the San Francisco Department of Recreation and Parks has been actively participating in the Technical Work Group meetings.
7. Identify sand sources are beyond the scope of this planning effort.

Public

32. Kathleen Moresco

1. Your comment is in the record.
2. Provided below are responses to your list of partial questions provided in your comment:
 - Page 14 of the Alternative Adaptation Strategies Memo: The Final Draft Adaptation Plan provides recommended adaptation strategies for the Fairmont West subarea regarding the project erosion. The shoreline in the Fairmont West subarea is currently privately owned or federally owned. These owners will need to adapt to coastal hazards in a manner that is consistent with the final policies in the certified LCP. These policies will be developed in the next phase of the planning effort. Comments on the efficacy of current erosion control measure are outside of the scope of this planning effort.
 - Page 16 of the Alternative Adaptation Strategies Memo: While the City will not fund adaptation strategies to protect private property, the City will permit and support the permitting of projects in Shoreview neighborhood that are consistent with the LCP policies for the subarea.
 - Page 19 of the Alternative Adaptation Strategies Memo: Pacifica State Beach has been used as an example of "managed retreat" when structures on the south end of the beach were relocated. A helpful summary of this effort is available online here: <https://www.cakex.org/case-studies/restoration-and-managed-retreat-pacifica-state-beach>. This planning effort is using publicly available models to project future sea level rise. The historic recordings of the Pacifica State Beach width, Linda Mar groundwater levels, and sand sources are beyond the scope of this conceptual-level Adaptation Plan.

- Page 21 of the Alternative Adaptation Strategies Memo: Recommended adaptation strategies for the Pedro Point and Shelter Cove subarea are detailed on Page 33 of the Final Draft Adaptation Plan and an Adaptation Overview Sheet for the subarea is available in Appendix C of the Final Draft Adaptation Plan.
3. Your comment is in the record.

33. Sue Schectman

1. The distinction between homes in the Pedro Point and Shelter Cove subarea that are on the bluff top or along the waterfront near San Pedro Creek or in Shelter Cove has been further made in the report. The subareas are defined by the City, and each has its own range of conditions and hazard exposures which are described in the Adaptation Plan.

34. Jim Wagner

1. It is not known if or how third parties will use the City's Local Coastal Plan and Adaptation Plan. However, it is important to note that the City is not creating new hazard data. The study is relying on existing hazard data produced by other agencies such as such as the Federal Emergency Management Agency (FEMA) and State of California Ocean Protection Council. The hazard data used in the City's study is already readily available to the public and financial institutions and insurers. The Final Draft Adaptation Plan generally recommends protection as the primary adaptation strategy to protect existing structures potentially vulnerable to sea level rise hazards. The City believes that having certified policies in place to address sea level rise adaptation will be helpful information for to the public and financial institutions and insurers.

35. Brad and Julie Wahrlich

1. Please see the recommended adaptation strategies for the Pedro Point and Shelter Cove subarea on Page 33 of the Final Draft Adaptation Plan. The Final Draft Adaptation Plan does disclose that implementing bluff toe armoring would be complicated due to land ownership.

36. Gina Zari

1. Please see Master Response A regarding managed retreat.

37. James Steele

1. Identifying the requested citation is beyond the scope of this planning effort. The State of California requires that local agencies address climate adaptation and resiliency strategies in long range planning documents (SB 379). The Governor's Executive Order No B-30-15 also directed state agencies to factor climate change into planning decisions. This order has been promulgated by the Coastal Commission to be included in Local Coastal Plan updates. So regardless of one's position on the science, the study that the City is in the process of completing is required.

38. Richard Harris

1. Your comment is in the record.

39. John Peterson

1. Your comment is in the record.

40. Charles Gust

1. Your comment is in the record.

Preliminary and Final Draft Adaptation Plan

Community Work Group

41. Sam Casillas

1. Your comment is in the record. Identifying a specific project-level adaptation strategy is beyond the scope of this planning effort.

42. Gordon Tannura

1. Your comment is in the record.
2. Your comment is in the record. The dates in the Final Draft Adaptation Plan are meant to provide a general timeframe, but are not intent to act as a trigger. The environmental triggers are intended to be used to implement the adaptation strategies. The next phase of this planning effort, the Draft LCP Policies, will develop policies for how to implement the adaptation strategies. The Draft LCP Policies were released for public comment at the time of final preparation of this document and includes the need to monitor.
3. Your comment is in the record.
4. The City currently supports a Transfer of Development Rights (TDR) program as detailed in Pacifica Municipal Code Section 9-4.4200 *et. al.* The municipal code does not regulate the value of the development rights. The standards for a sending and receiving site are detailed in PMC Section 9-4.4203 and 9-4.4204, respectively.
5. Infrastructure data gaps are clearly disclosed in Section 5.3. ESA does not have the budget or schedule to fill every data.
6. Soft costs (i.e. planning, studies, engineering etc.) are included in most of the unit costs. A detailed assessment of all soft costs for both adaptation engineering actions and asset/infrastructure is beyond the scope of this study.
7. As disclosed in Chapter 5 of the Final Draft Adaptation Plan, future economic conditions are evolving and unpredictable. The project's economist, Dr. King, has applied standard methods which are described in Chapter 5 of the Final Draft Adaptation Plan to estimate what the cost of a project may be in the future. However, Dr. King is unable to apply any quantitative degree of certainty of these costs.
8. The Final Draft Adaptation Plan includes Transactional Cost, which include some of the cost assumptions mentioned in your comment.
9. Please see Master Response E regarding sensitivity of beach value estimates and beach visitation total to the general analysis.
10. Your comment is in the record. We have developed an additional data appendix that contains the engineering cost schedules for each adaptation alternative and asset exposures for each adaptation alternative that were used along with unit costs (numerated in the Plan) to develop the economic impacts under each alternative.
11. In the Final Draft Adaptation Plan, each subarea has a table that breaks down the benefits and costs for the adaptation alternative for the respective subarea. In those tables you will find that engineering and transaction costs are considered for the managed retreat alternative. In the figures that provide a visual representation of these tables, the engineering costs for the managed retreat alternative are often represented with a narrow line compared to other costs.
12. The City provided TOTs for only these two areas because sea level rise would have the greatest impact on these subareas. These two subareas include the identified specific hotels that would be impacted.
13. An example was included in Final Draft Adaptation Plan in response to your comment to clarify the cumulative loss of property tax revenue.

14. The highlighted statement in Appendix C has been revised in the Final Draft Adaptation Plan in response to your comment.
15. The cost-benefit analysis, especially for Alternative 3 (Managed Retreat), is based on emergency grant applications prepared by the City for recent shoreline protection projects in north Pacifica (damaged/removed apartments and homes along Esplanade). Other case studies should indeed be documented and considered.
16. A comparison of sea level rise-accelerated erosion and beach width estimates was added to section 5.3
17. The cost is to realign the length of road and utilities in the adjacent vacant land. Detailed analyses of alternative (and more costly) access solutions are beyond the scope of this study.
18. Your comment is in the record. Please see Master Response D regarding ecological values and Master Response E regarding beach recreational values.
19. Your comment is in the record.

43. Jim Kremer

1. An explanation was added to the Final Draft Adaptation Plan to clarify the various thresholds in Table 2.
2. The City currently supports a Transfer of Development Rights (TDR) program as detailed in Pacifica Municipal Code Section 9-4.4200 et. al. The municipal code does not regulate the value of the development rights. The standards for a sending and receiving site are detailed in PMC Section 9-4.4203 and 9-4.4204, respectively.
3. Explanation was added to the Final Draft Adaptation Plan to clarify the various thresholds in Table 2.
4. The Final Draft Adaptation Plan was revised to clarify dependent the economic analysis is on assumptions. Economists have used discount rates between 0 and 6 to 7 percent. Given that public financing (e.g., municipal bonds) will likely be involved in some or all of the options, the analysis reflects the cost of borrowing money to finance a project. Municipal rates are low now, so 3 to 4 percent would be appropriate. This study uses 3 percent. However over a long time horizon such discounting essentially gives little value to future generations, which is problematic.
5. The coastal commission dictates the timelines. However, it's worth noting that New Zealand and some European countries require projections of even longer duration for planning horizons. However, it is agreed that any benefit/cost analysis that extends that far should be interpreted accordingly.
6. The economic analysis is stated to be based on one sea level rise scenario in the locations mentioned and elsewhere.
7. Your comment is in the record.
8. Per your comment, the typo has been corrected.
9. See Master Response D regarding ecological values.

44. Ron Maykel

1. The information that you suggested to include is already provided on Page 14 of the Final Draft Adaptation Plan.

45. Connie Menefee

1. Your comment is in the record. Please see Master Response A regarding managed retreat.
2. Please see responses to Comment 42-1 through 42-19.

46. Robin Runneals

1. Your comment is in the record.
2. This study did examine sales tax losses in two key areas and TOT tax losses in one planning area as these were the only TOT data the City provided the consultant. Unfortunately, other analyses are beyond the scope of the economic analysis.
3. This study did not estimate property and other tax losses in 2100 given the level of uncertainty. The Coast Highway is not at risk of flooding in Sharp Park under any adaptation scenario as it is significantly elevated (see webmapper linked on Pacifica's sea level rise webpage). Coast Highway is discussed in the Adaptation Plan for subareas where managed retreat may have an impact on the Highway.
4. The study relies on the best available information on affordable housing which was obtained from San Mateo County and is the same data source that was used for the County-wide SeaChange Study.
5. Trails are discussed in the adaptation plan. We understand beach use is lower in northern Pacifica and that people mostly use the trails there. Beach use is a key issue for Pacifica State Beach and Rockaway, and is discussed in the Adaptation Plan.
6. The Adaptation Plan includes reference to the Coastal Commission permit for the Sharp Park levee and assumes that the levee will be maintained and armored by the City of San Francisco. Please see Master Response D regarding ecological values.
7. Pacifica is currently experiencing unmanaged or emergency-driven retreat, so managed retreat (in which public and private assets are planned to retreat in an equitable manner) is pertinent to examine as an option for adaptation.

Technical Work Group

47. Coastal Commission

1. Your comment is in the record. The City revised the administrative Draft Adaptation Plan to include an analysis of managed retreat in each subarea.

48. San Francisco Department of Recreation and Parks

1. See responses to Comments 25-1 and 25-2.

49. Coastal Commission

1. Your comment is in the record.
2. The Final Draft Adaptation Plan is not meant to establish policies for adaptation. The Final Draft Adaptation Plan evaluates various adaptation alternatives and compares the cost-benefits of each alternative. The recommendations from the Final Draft Adaptation Plan provide some guidance from ESA based on the results of the comparison. As stated on Page 65 of the Final Draft Adaptation Plan, the engineering assumptions for the cost-benefit analysis assume that the coastal armoring will be reconstructed and beaches will be nourished every 20 years. The policies created based on the information from this adaptation plan should be reviewed for meeting the requirements of the Coastal Act as the policies will be part of the Local Coastal Program.

A financial feasibility assessment or a detailed engineering feasibility assessment are beyond the scope of this task and not included as part of the grant agreement. The financial feasibility of funding an adaptation strategy will be determined at the time of implementation based on the federal or state fund assistance available and available local funds at the time. The Final Draft Adaptation Plan did consider high level technical feasibility, including geomorphology of each

subarea when identifying appropriate adaptation strategies for each subarea. Specific engineering requirements of each adaptation strategy will be determined at the project planning phase.

3. The Adaptation Plan is meant to evaluate adaptation strategies at the conceptual level. The policies of how the adaptation plan would be implemented would be better detailed in the draft LCP policies (in the Land Use Plan) or in some cases a future amendment to the Implementation Plan (zoning). The draft SLR policies include mitigation for armoring effects to maintain beaches where it is most feasible (Linda Mar, Rockaway, Sharp Park). A similar program policy is recommended for coastal access. Policies that require managed retreat for properties that are able to show their property is safe from hazards during the life of the project, or restricting redevelopment rights of a property that is safe from hazards may create legal exposure.
4. Your comment is in the record and will be considered during the next phase of the planning effort, public review of the Draft LCP policies.
5. Your comment is in the record.
6. Managed retreat is modeled by the shoreline model as ongoing erosion, and the implication is that the backshore bluffs will not erode as quickly as the water line and the beach is "squeezed" between the two. ESA developed more explanation and compared the quantified conceptual model of shore erosion used to the simplified Bruun transgression approach, and determined that the Bruun approach indicates much more backshore recession and assumes a beach is maintained (implicitly). It is not clear that there is enough sand being supplied by alongshore transport to replenish beach. Additionally, the existing sand is too fine in grain size to maintain a beach in front of the bluffs. Massive beach nourishment is required to create beaches in this area, as well as a lot of shore recession and or coastal structures. The budget did not allow for a detailed diagnosis of the sand budget and reduced sand supply.
7. Please see response to Comments 49-2 and 49-3. The adaptation triggers/thresholds are listed in Table 2 of the Final Draft Adaptation Plan.
8. Your comment is in the record and will be considered during the next phase of the project regarding Draft LCP policies. Additional funding is needed to do a study and pursue nourishment at Rockaway. One consideration will be finding available sand that is large enough. Results of beach nourishment modeling with offshore sand retention structures indicate that re-nourishment may be required twice as frequently by 2100. We understand your comment about coarse sand impacts, though there is a coarse sand "lag" in much of Pacifica especially Sharp Park.
9. Responses to your questions regarding the cost-benefit analysis are provided below.
 - a. Discussion on this assumption was added to the report under "Costs not included in this study".
 - b. Discussion on this assumption was added to the report under "Costs not included in this study". Draft sea level rise policies recommend pursuing mitigation funding mechanisms.
 - c. We expanded on the implications of this assumption in the methods section.
 - d. This cost multiplier for infrastructure (not buildings) is explained further in the report. It may overestimate the costs of managed retreat in the long term because the length of infrastructure needed will be reduced as the remaining blufftop space is reduced. However, the cost factor was developed based on the City's recent Hazard Mitigation Plan Grants that were awarded and could account for the potential to expand or upgrade infrastructure in areas outside of the coastal zone to accommodate more dense development in response to retreat away from hazardous coastal areas.

- e. The beach widths are accounted for in the future under all alternatives and tracked with recreational value. The model employed here assumes a carrying capacity of 100 sq. ft. per person. This follows US Army Corps of Engineers policy and is consistent with the \$40/day value the CCC supported at Solana Beach. Beach width/area matters because carrying capacity increases with width/area. In the past, Dr. King has employed the Coastal Sediment Benefits Analysis Tool, which assigns a higher day-use value to wider beaches. However if the CCC employs a flat \$40/day metric, the recreational value of increased beach width/area must be derived elsewhere. See Master Response E regarding beach recreational values.
 - f. The recreational value of Sharp Park Golf Course is discussed in Appendix G. Currently, the costs of providing the services (fees and subsidy from San Francisco Department of Recreation and Parks) are approximately equal to the recreational value.
 - g. Transaction costs are discussed as a contingency comprising potential costs of appraisals of the property value, prior damages if any, utility shut-off, structure demolition and site clearing, staff time to apply for grants including estimates of alternative actions, permits and approvals, and legal consultation. They accrue for managed retreat primarily because properties are acquired and cleared, whereas in the Alternatives 1 and 2 these properties are protected in place and not transferred.
 - h. The managed retreat alternative does not include the relocation of housing in other areas and associated transfer of property taxes to other areas in the City. Public assets are assumed to be rebuilt, but we did not assume that a house could be rebuilt elsewhere. Explanation has been added to the cost-benefit analysis results sections. Protection Alternatives 1 and 2 maintain the current extent of development and thus experience very little tax losses.
 - i. The analysis assumed that attendance will increase with population over time. Also the future time periods are longer. Armoring impacts beach recreation to the extent that beach width lowers carrying capacity, e.g., at Pacifica State Beach, armoring will lower recreational value, compared to other strategies.
 - j. Per the grant, the impacts of a 100-year coastal storm were analyzed. We assessed the potential damages assuming 1 percent probability of a storm each year and discounted the economic damages using depth damage curves from the US Army Corps of Engineers. The 100-year storm damage costs increase with time because the extent of potential impacts increases with sea level rise as shown in the CoSMoS 100-year flooding exposure results. Assuming an increased frequency of occurrence in the cost-benefit analysis is outside the scope of this study. Not all structures are removed under managed retreat alternative, which focuses on retreating from erosion impacts. Some assets are still impacted by coastal storm flooding around the golf course, hence the impacts (including property without structures). Additional explanation was added to the methodology section. Actions taken on the open coast (armoring/nourishment) would not affect groundwater exposure in West Linda Mar and Pedro Point areas. Groundwater is addressed in the adaptation plan recommendations section where it is projected to be a future concern.
10. Responses to your general comments are provided below:
- a. The City prefers to include this section up front in the document.
 - b. The report text has been modified accordingly. Additional City-wide strategies are discussed in section 4.1 intro paragraphs.
 - c. Additional detail was added to describe the thresholds table.

- d. See above needs associated with managed retreat. One of the City Council's goals is to protect existing homes, businesses and infrastructure.
 - e. These options have been added to the table.
 - f. Wording has been modified accordingly. The Final Draft Adaptation Plan is not meant to be policies for adaptation. The Final Draft Adaptation Plan evaluates various adaptation alternatives and compares the cost-benefits of each alternative. The recommendations from the Final Draft Adaptation Plan provide some guidance from ESA based on the results of the comparison. The policies created based on the information from this adaptation plan should be reviewed for meeting the requirements of the Coastal Act as the policies will be part of the Local Coastal Program.
 - g. The bullets have been separated and modified as suggested.
 - h. The description has been modified accordingly. Most Pacifica structures pre-date the Coastal Act.
 - i. Most areas are developed and setbacks are addressed only when new development proposes actions and submit a geotechnical report. Setbacks were evaluated considering the potential for undeveloped areas, hence the lack of suitability indications. They are indeed suitable however in the case of a redevelopment so the signs have been modified for all but West Linda Mar, which is not exposed to erosion impacts.
 - j. Table 3 was added and details historic erosion rates with explanation of potential for shoreline protective devices to affect rates.
11. Your comment is in the record.

Public

50. Sue Eldredge

1. Please see Master Response A regarding managed retreat.

51. Matthew Koester

1. Your comment is in the record.
2. Section 4.2 of the Final Draft Adaptation Plan details potential funding sources to implement the public adaptation strategies. Funding sources include potential federal, state and local sources.
3. The scheduling of Engineering Measures for Adaptation Strategies is discussed on Page 64 of the Final Draft Adaptation Plan. The cost-benefit analysis is based off of this assumed scheduled.
4. See Master Response A regarding managed retreat.
5. Your comment is in the record.

52. Tony Sladel

1. The estimated useful life of shoreline protection structures for the adaptation alternative analysis is 20 years.

53. Allison West

1. The scope of this planning effort does not include managing growth in any area. The purpose of the Adaptation Plan phase of this planning effort is to identify at a conceptual-level how development (new and existing) will have to adapt to projected sea level rise hazards. Use of wetlands to mitigate flooding impact could be implemented under the retreat adaptation strategy. However, only wetlands on public property could be used to protect public infrastructure. Privately owned properties would be able to use wetlands on their property to protect their private development.

2. The FEMA flood maps incorporated into the Vulnerability Assessment to identify existing flood zones. The Adaptation Plan was prepared to address vulnerable assets in the Vulnerability Assessment.
3. Your comment is in the record.

54. Suzanne Moore

1. Responses to your questions are provided here:
 - Agencies that have adopted goals or policies that supports an action or a project that is seeking funding through a grant are often given an advantage.
 - As consistently discussed in the Final Draft Adaptation Plan, managed retreat for private properties is optional.
 - The City's grant agreement with the Coastal Commission to conduct this planning effort requires the City to evaluate the managed retreat adaptation alternative. If the terms of the grant agreement are not met, there could be impacts to the funding provided to the City.
 - Please see the response provided in the first bullet point. Additionally, this phase of the planning project does not include proposed policies for the LCP. This question may be better asked during the public comment period for the Draft LCP policies.
 - A consideration that the City Council (and the Planning Commission) has when considering approval of a project or action in the Coastal Zone is its consistency with the Local Coastal Plan.

55. Amy Caplan

1. Your comment is in the record. Planning for future food and water security is outside the scope of this planning effort.

56. Amy Caplan

1. Your comment is in the record. This slide was not incorporated into the August 11, 2018 public meeting because it was outside of the scope of the presentation.

57. Mark Duane

1. Your comment is in the record

58. Amy Caplan

1. Your comment is in the record.

59. Laurie Goldberg

1. Your comment is in the record.

60. Pat Kramer

1. Your comment is in the record. Dates were provided to identify a project timeframe of the impacts but the adaptation strategies are intended to be implemented based on environmental triggers.
2. Your comment is in the record. Please see response to Comment 60-1.

61. Matt Lanier

1. Your comment is in the record.
2. As detailed in response to comments on the Draft Vulnerability Assessment, future coastal erosion is predicted by using historic shoreline erosion data. To some degree, very old coastal

armoring structures are accounted for as they slowed the historic shoreline erosion rate. More modern armoring structures haven't had a chance to show an impact in the historic erosion data. Therefore, while newer armoring structures are shown on study maps, the Vulnerability Assessment reflects a worst-case scenario and if shoreline protective devices are maintained in place erosion rates will be significantly reduced. This approach is consistent with best practices when considering erosion scenarios including the San Mateo County Vulnerability Assessment. During the adaptation planning phase of this effort, the City considered locations of existing armoring structures for future adaptation strategies.

62. John Murphy

1. Your comment is in the record.

63. Roy Stotts

1. Your comment is in the record.

64. Allison West

1. Your comment is in the record Please see response to Comment 53-1.

65. Julie Thomas

1. Your comment is in the record.

66. Deborah Gold

1. Your comment is in the record.

67. Bridget McKenna

1. Your comment is in the record.
2. As further explained on Page 67 of the Final Draft Adaptation Plan, the loss of property due to erosion would reduce the number of properties that would contribute property taxes.
3. Please see Master Response D regarding ecological values.
4. Your comment is in the record.

68. Victor Carmichael

1. Your comment is in the record.

69. Richard Michaels

1. Your comment is in the record. Please see Master Response B regarding public notification.

70. Gregor Blackburn

1. Your comment is in the record.

71. Jeffrey Bruno

1. Your comment is in the record.

72. Jeff Guillet

1. Please see Master Response C regarding concerns from Fairway Park West residents.

73. Jay Crawford

1. Please see Master Response C regarding concerns from Fairway Park West residents.

74. Chris Redfield

1. Your comment is in the record.

75. Various Signatures

1. Please see Master Response C regarding concerns from Fairway Park West residents.

76. John Negley

1. Your comment is in the record.

77. Linda Acosta

1. Please see Master Response C regarding concerns from Fairway Park West residents.

78. Lauren Blac

1. Your comment is in the record.

79. Judy Borland

1. Please see Master Response C regarding concerns from Fairway Park West residents.

80. William Bradford.

1. Your comment is in the record.

81. Amy Caplan

1. Your comment is in the record.

82. Debbie Durham

1. Please see Master Response C regarding concerns from Fairway Park West residents.

83. Suzanne Gauci

1. Your comment is in the record.

84. Margaret Goodale

1. Your comment is in the record.
2. US Army Corps of Engineers has not provided the City with a formal Federal Interest Determination (FID) for the Beach Boulevard Seawall Project, Milagra Creek Outfall Repair Project and the 300 Block of Esplanade Project. Please contact the Engineering Department to answer any follow up questions.
3. Your comment is in the record.
4. This planning effort is analyzing adaptation strategies at the conceptual level. Specific projects to implement the approved policies will be identified at later time.
5. Your comment is in the record.

85. Marianne Grandon

1. Please see Master Response C regarding concerns from Fairway Park West residents.

86. Michael Grandon

1. Please see Master Response C regarding concerns from Fairway Park West residents.

87. Norma Hilton

1. Please see Master Response C regarding concerns from Fairway Park West residents.

88. Sean Keane

1. Please see Master Response C regarding concerns from Fairway Park West residents.

89. Jim and Debbie Kimball

1. Please see Master Response C regarding concerns from Fairway Park West residents.

90. Shirley Lorence

1. Please see Master Response C regarding concerns from Fairway Park West residents.

91. Lori Martin

1. Please see Master Response A regarding managed retreat.
2. Your comment is in the record. Please see Master Response A regarding managed retreat. The tax loss estimates are for flooding and follow a similar study recently completed in San Diego. The City of Pacifica also estimated the legal costs of retreat, beyond property damages, based on past experience.

92. Michael Martin

1. Your comment is in the record

93. Kevin McCluskey

1. Please see Master Response C regarding concerns from Fairway Park West residents.

94. Ryan Grimm

1. Please see Master Response C regarding concerns from Fairway Park West residents.

95. Delia McGrath

1. Your comment is in the record. Please see Master Response A regarding managed retreat.

96. Dennis Miralda

1. Please see Master Response C regarding concerns from Fairway Park West residents.

97 Stephanie Meyer

1. Please see Master Response C regarding concerns from Fairway Park West residents.

98. Marie Miralda

1. Please see Master Response C regarding concerns from Fairway Park West residents.

99. Eric Myhres

1. Please see Master Response B regarding public notification and Master Response C regarding concerns from Fairway Park West residents. The US Army Corps of Engineers is participating in the City's planning process as part of the Technical Work Group.

100. Pot Nuntavong

1. Please see Master Response C regarding concerns from Fairway Park West residents.

101. Andrew and Kerry Patterson

1. Please see Master Response C regarding concerns from Fairway Park West residents.

102. Dan Peknik and Jeff Guillet

1. Please see Master Response C regarding concerns from Fairway Park West residents.

103. Mike and Barbara Reynolds

1. Please see Master Response C regarding concerns from Fairway Park West residents.

104. Thursday Roberts

1. Your comment is in the record.

105. Ramon Christopher Rodriquez

1. Your comment is in the record. Please see Master Response B regarding public notification.

106. Linda Roiz

1. Your comment is in the record.

107. Steve Sinai

1. Your comment is in the record.

108. Sandy Slick

1. Your comment is in the record.

109. Janet and Ken Talsky

1. Please see Master Response C regarding concerns from Fairway Park West residents.

110. Unnamed

1. Your comment is in the record. Please see Master Response B regarding public notification.

111. Stan Zeavin

1. Your comment is in the record.

112. Vinh DePaul

1. Your comment is in the record.

113. Celeste Langille

1. Your comment is in the record.
2. Potential funding sources are identified in Section 4.2 of the Final Draft Adaptation Plan. It unknown at this time what funding sources will be available and/or preferred to fund potential adaptation strategies. Therefore a tax impact analysis is beyond the scope of this planning effort.
3. Although, implementation of the adaptation strategy will be trigger based and not time based, the cost-benefit analysis requires the cost to be associated with a timeframe to estimate the discount rates.
4. A Transfer of Development Rights program is an existing program. The process for the program is detailed in Pacifica Municipal Code Section 9-4.4200 *et. al.* No typo was identified as noted by the commenter.

5. The numbering system in Tables 5 through 12 restart for each subarea to allow the document to reference similar adaptation strategies between the subarea (i.e. generally Alternative 1 in each subarea is protect, Alternative 2 is a hybrid protection approach, and Alternative 3 is retreat).
6. Table 13 in the Final Draft Adaptation Plan details the engineering unit cost estimates for infrastructure replacement and adaptation measures. A summarized breakdown of the overall cost of each adaptation strategy is beyond the scope of this planning effort.

114. Cristal Barrera

1. Your comment is in the record.

115. Raul Barrera

1. Your comment is in the record.

116. Peter Loeb

1. Please see Master Response C regarding concerns from Fairway Park West residents.

117. Stephanie Dudum

1. Your comment is in the record.

118. Richard Harris

1. Appendices have been added to the report. The revised asset impacts associated with each adaptation alternative are now added (Appendix I) and the adaptation plan already includes engineering unit costs used to estimate the economic value of these impacts. The engineering cost schedules developed for each adaptation alternative are now provided in detail (Appendix J), which apply the engineering unit costs already provided in the report for actions taken in each subarea for each adaptation alternative. This study analyzed economic impacts to property in the aggregate, as described in the Economic Methodology memo, as the budget for the study did not include individual-parcel-level valuations. In the aggregate, the parcel valuations developed are reasonable.
2. It has been clarified the sea level rise projections are for San Francisco region and apply to Pacifica. Publicly available data on SF garter snake and CA red legged frog do not include the SFGC, so they do not appear in the table of Appendix C. Creating new habitat data is outside of the study scope. Appendix C has been updated to provide the length-weighted average values for beach width and erosion distance for the Beach Boulevard and Sharp Park Golf Course berm reaches that comprise the subarea.
3. Master Response E regarding sensitivity of beach value estimates and beach visitation total to the general analysis.
4. Master Response E regarding sensitivity of beach value estimates and beach visitation total to the general analysis.

Natesan, Sanjana

From: Gordon Tannura <gtannura@gmail.com>
Sent: Monday, April 23, 2018 8:48 PM
To: Sea Level Rise; O'Connor, Bonny
Cc: pguzmanus@yahoo.com; James Kremer; Maureen Garcia; julie.a.lancelle@gmail.com; balesl@icloud.com; Samuel Casillas; ldcunha16@gmail.com; Cindy Abbott; Robine Runneals; Jim Steele; Connie; ron maykel; krishnaswamy.shalini@gmail.com; Eileen O'Reilly | Your Personal Realtor; tynipac@gmail.com; Wehrmeister, Tina
Subject: Re: Pacifica SLR Webpage Update - Introduction to Adaptation Strategies Memorandum Posted

Bonny,

Thank you for providing the Memorandum and soliciting feedback. I am offering the following:

1 - I have seen the term “retaining wall” applied to the structure on Beach Blvd as well as “sea wall”. The Adaptation Strategies might add clarity on this, especially if there is a meaningful difference between the two, and if so, identify the implications of them relative to new development or maintenance of existing. For example, the memorandum identifies for rolling easements the Coastal Commission's “no further sea wall” deed restriction on new shoreline development. If all or part of the current Beach Blvd structure is a retaining wall, would constructing a sea wall be permitted for new development like the envisioned hotel at the Old Sewer Plant?

2 - From the description of an Ecotone Levee, the levee at the Sharp Park Golf course might be considered in part as such, or might be modified to become such. Perhaps that section can be elaborated to better address the current state of the levee and what it could evolve to.

3 - There are little or no references to offshore breakwaters or reefs as appropriate strategies for Pacifica. The Strategies should identify why they might not be suitable for Pacifica, especially as it seems there are several positive outcomes from deploying them. I would also recommend significantly expanding the description of the ESA “concept” to identify its viability, advantages, disadvantages, and Coastal Commission views on such structures, and what would need to be done to bring the concept to life.

4 - Regarding armoring for private property, I believe information should be added to responsibilities and rights of the property owners, and the extent of responsibility that the City has. What comes to mind is the Esplanade apartments that ultimately became the responsibility of the City to demolish and remove. Perhaps this can be addressed in further drafts, but at some point, whatever strategies are identified, implementation of those strategies and the full implications of that must be elaborated.

5 - I am curious as to the process that will be proposed for selecting the appropriate adaptation strategy. I suggest that you at least supplement this version with next steps and perhaps an overview of the criteria and selection process, or provide that information in a separate memorandum.

6 As I identified to you, unfortunately I will be unable to attend this Thursday’s meeting due to prior commitments. I request that a more timely (than the last summary) summary of this meeting be distributed and before the meeting on May 10. Also, will this week’s meeting be recorded, and if so, please let know how I can access that?

7

Regarding encouraging attendance, i am doing my best at that through personal contact. I also see reference to the upcoming meeting in the weekly update provided by the City Manager. Have you considered identifying the meeting via Nextdoor or other social media? As there has been concern expressed for misinformation, perhaps you can better announce and inform the community through that avenue. Alternatively, I and others could do the same, and I suggest that the Work Group identify an approach going forward.

Sincerely,

Gordon Tannura

On Apr 20, 2018, at 11:07 AM, sealevelrise@ci.pacifica.ca.us wrote:

Hello CWG,

The Introduction to Adaptation Strategies Memorandum has been posted to the Sea Level Rise webpage at www.cityofpacifica.org/sealevelrise. We would like you to read this memo and provide constructive feedback to staff by Tuesday, April 24, 2018 (5pm) that will highlight for staff and the consultant what information may need to be improved or clarified during the public meeting presentation. We would also like you to attend the public meeting/Community Work Group meeting on Thursday, April 26, 2018 at the Pacifica Community Center (6:00pm - 9:00pm).

Additionally, please help us inform and encourage the public to attend this meeting. We have extended the length of the meeting to three hours to allow time for public comments. A citywide mailer is being produced for delivery next week, however, it may be received by the public with very short notice of this upcoming meeting, so any assistance that you can provide getting the word out would be appreciated.

Lastly, Tina and I will be at ECOFest on Saturday, spreading the word about the upcoming meeting and our overall sea level rise planning efforts. If you are around, please stop by and say hi!

Please let me know if you have any questions.

Thanks,
Bonny

Bonny O'Connor, AICP
Assistant Planner
Planning Department
City of Pacifica
1800 Francisco Blvd.
Pacifica, CA 94044
www.cityofpacifica.org

Email: o'connorb@ci.pacifica.ca.us
Phone: (650) 738-7443
Fax: (650) 359-5807

O'Connor, Bonny

From: Eileen O'Reilly | Your Personal Realtor <emkoreilly@gmail.com>
Sent: Tuesday, April 24, 2018 5:40 PM
To: Samuel Casillas
Cc: Jim Steele; O'Connor, Bonny; gtannura@gmail.com; Sea Level Rise; pguzmanus@yahoo.com; jamesnkremer@gmail.com; ms.mo.garcia@gmail.com; julie.a.lancelle@gmail.com; balesl@icloud.com; ldcunha16@gmail.com; cala3319@gmail.com; pacfam5r@pacbell.net; constellation747@comcast.net; themaykelfamily@sbcglobal.net; krishnaswamy.shalini@gmail.com; tynipac@gmail.com; Wehrmeister, Tina
Subject: Re: Pacifica SLR Webpage Update - Introduction to Adaptation Strategies Memorandum Posted

Hi All,

I think we all need to be able to discuss the options that are available to us and understand how these options will affect the residents, not just in these zones, but all over Pacifica.

I have been reading through the CCC residential adaptation plan and while I am not a scientist like Jim, who does have some background with regards to Sea Level Rise- I do have concerns about the language in the document when it comes to properties, businesses and infrastructure that are in these zones and the idea of managed retreat as an option.

So I think we need to flush that out a lot more and I am looking forward to the discussion on Thursday

Eileen

Follow me on social media:

[Check out my Current Listings](#) [Find your property value](#) [Try my Mobile App](#)

On Tue, Apr 24, 2018 at 5:01 PM, Samuel Casillas <samuelcasillas@hotmail.com> wrote:

Jim
 I believe it is disingenuous to call managed retreat spin. You may not believe it is a workable solution but it is an option that CC and the state of California has asked cities to consider.

I understand the emotion where people's homes are taken at risk, I want to make sure it is understood that these misinformed statements about managed retreat are not shared by others on the committee.

Regards
 Sam

Sent from my iPhone

On Apr 24, 2018, at 4:31 PM, Jim Steele <jsteele3@ix.netcom.com> wrote:

Here is my feedback regards Pacifica's recent memorandum.

1. To state that "ESA does not have a predetermined opinion concerning various solutions for

O'Connor, Bonny

From: Jim Steele <jsteele3@ix.netcom.com>
Sent: Tuesday, April 24, 2018 4:31 PM
To: O'Connor, Bonny; gtannura@gmail.com; Sea Level Rise
Cc: pguzmanus@yahoo.com; jamesnkremer@gmail.com; ms.mo.garcia@gmail.com; julie.a.lancelle@gmail.com; balesl@icloud.com; samuelcasillas@hotmail.com; ldcunha16@gmail.com; cala3319@gmail.com; pacfam5r@pacbell.net; jsteele3@ix.netcom.com; constellation747@comcast.net; themaykelfamily@sbcglobal.net; krishnaswamy.shalini@gmail.com; emkoreilly@gmail.com; tynipac@gmail.com; Wehrmeister, Tina
Subject: RE: Pacifica SLR Webpage Update - Introduction to Adaptation Strategies Memorandum Posted

Here is my feedback regards Pacifica's recent memorandum.

1. To state that "ESA does not have a predetermined opinion concerning various solutions for sea level rise" appears to be more publicity spin that does not objectively analyze the viewpoints of the ESA or those who push their preferred solutions. Bob Battalio has long been an advocate of managed retreat. To suggest he and ESA have no predetermined opinion is spin that appears to deflect well documented public evidence and ignores past advocacy by Battalio for managed retreat. Such spin calls into question the objectivity of Pacifica's memorandum and evokes my distrust that there is an objective analysis.
2. The memorandum stated that "March 26, 2018 the Pacifica City Council formalized the Goals for the Draft Local Coastal Land Use Plan Update and Adaptation Planning. Goal No. 3 is to Preserve Existing Neighborhoods and Promote Environmental Justice and Local Economic Vitality and states that the Adaptation Plan shall protect existing homes, businesses, and infrastructure in Pacifica" I am pleased to see Pacifica's commitment. Thus if Pacifica is honestly committed to protecting "existing homes, businesses, and infrastructure" then managed retreat should not be an option at the current time unless no other choice remains, because managed retreat implies sacrificing existing structures.
3. Figure 4 in the memorandum promotes the successes of managed retreat and the memorandum suggests managed retreat at Pacifica State Beach has been highly successful and implies it increased the amount of beach width. However that would only be true if before and after pictures were taken during the same tides. To have any value a time, date and tide level need to accompany those photographs. A similar criticism for Figure 6, and its suggestion of lost beach at high tide due to the sea wall. The dark wet sand in the photo suggests higher water also existed in 1985. Furthermore, managed retreat in the low-lying "delta" area of San Pedro Creek may have been successful, but the sub-regions experiences a much different dynamic than the dynamics needed to be addressed along coastlines with steep bluffs. Again the first half memorandum appears to be misleadingly promoting successful managed retreat versus failed attempts to armor the areas with steep bluffs, although the last section does highlight success of hybrid solutions.

My biggest concern, for the community's ability to evaluate any cost/benefits of an adaptation plan, analyses of how beach sediments are transported within each sub-area is a necessity. The focus on sea level rise, and related extreme scenarios only obscures the problems that would cause beach erosion even if there was no sea level rise.

About 75 to 99% of beach erosion is due to lost sediment transport from upstream dams. Based on that fact alone, beach nourishment strategies would be the most important response to protect our beaches and cliffs. Depending on how sand is imported and exported to each of Pacifica's sub-regions, various structures may or may not be beneficial. Pacifica would have been far better served by spending money on analyzing sand transport dynamics than analyzing the effects of various speculative sea level rise scenarios, especially when half of Pacifica resides on coastal bluffs far beyond the reach of sea level rise.

3 The memorandum states “The City of Pacifica has not created any hazard data and does not have the budget or resources to create hazard data, therefore the City must rely on existing publicly available data.” However only publicly available data that analyzes Pacifica’s unique dynamics, will be of any value in producing a successful adaptation plan.

If we are to successfully protect Pacifica, we need local data, not data generalized for California. It is well established that different regions along California’s coast are subjected to different rates of erosion, requiring local solutions.

The NOAA 2017 document “Global And Regional Sea Level Rise Scenarios For The United States” presented data that sea level rise along our coast in recent decades that is “ less (<1 mm/year) within the Eastern Pacific and regions of the U.S. West Coast.” Nonetheless the hazard data that Pacifica and the ESA has chosen to emphasize, evaluates only the more extreme sea level rise scenarios, despite that recent evidence that sea level rise in Pacifica is lower than the current projections from any climate change scenarios.

The 2017 NOAA report citing the “most up to date science” presents a low-end scenario of minimum sea level rise of about 2 mm/year. In contrast, local observations of our region show less than a 1 mm/year rise. Although it is expected that a switch in the Pacific Decadal Oscillation may cause California sea level to rise faster when the winds shift, the degree of sea level rise predictions are just hypotheses that need to be tested.

Speculative scenarios are not proven science. Speculative climate threats need to be tested.

4 Our coastal erosion has been an ongoing phenomenon for centuries long before any human contributions. By examining the factors affecting coastal erosion within the framework of the projected minimal sea level rise, that analyses would provide a context for which we can compare adaptation scenarios, providing a baseline from which higher scenarios can be considered. Unfortunately ESA has chosen to ignore the low-end sea level rise estimates and is only promoting the more extreme views.

Based on current observations of 1 mm/year since the 1980s, a 3-fold sea level rise above current observations (3 mm/year) is a scenario that must be examined. That low-end scenario provides a baseline advising us of the coastal erosion threats that would happen no matter which sea level rise scenario proves to be accurate in the future. And only then can we evaluate the most appropriate adaptation plan.

Unfortunately our working group has been directed to only examine the more extreme scenarios. Furthermore although it is assumed that rising sea level is creating higher storm surges that would increase erosion, the most recent research from Scripps, "Storm surge along the Pacific coast of North America" Bromirski1 (2017) concluded, "patterns of storm surge variability along the Pacific coast of North America have not changed appreciably on decadal time periods since at least 1948. Thus the best adaptation plans must also consider the low end projections for the rate sea level rise, and examine adaptations that would be needed to protect property from relentlessly coastal erosion, even if there was no sea level rise.

Sincerely Jim Steele

-----Original Message-----

From: o'connorb@ci.pacifica.ca.us

Sent: Apr 24, 2018 8:16 AM

To: gtannura@gmail.com, sealevelrise@ci.pacifica.ca.us

Cc: pguzmanus@yahoo.com, jamesnkremer@gmail.com, ms.mo.garcia@gmail.com, julie.a.lancelle@gmail.com, balesi@icloud.com, samuelcasillas@hotmail.com, ldcunha16@gmail.com, cala3319@gmail.com, pacfam5r@pacbell.net,

O'Connor, Bonny

From: Jim Steele <jsteele3@ix.netcom.com>
Sent: Tuesday, April 24, 2018 5:58 PM
To: Samuel Casillas
Cc: O'Connor, Bonny; gtannura@gmail.com; Sea Level Rise; pguzmanus@yahoo.com; jamesnkremer@gmail.com; ms.mo.garcia@gmail.com; julie.a.lancelle@gmail.com; balesl@icloud.com; ldcunha16@gmail.com; cala3319@gmail.com; pacfam5r@pacbell.net; constellation747@comcast.net; themaykelfamily@sbcglobal.net; krishnaswamy.shalini@gmail.com; emkoreilly@gmail.com; tynipac@gmail.com; Wehrmeister, Tina
Subject: Re: Pacifica SLR Webpage Update - Introduction to Adaptation Strategies Memorandum Posted

Hi Sam,

You misinterpret what I tried to say and perhaps that is my fault.

I do not call, nor have I ever called, managed retreat spin. In fact I think there are times and places where managed retreat maybe the best option. As long as the city is dedicated to, and their first priority is to protect people's existing property as they stated, I think keeping managed retreat as part of our adaptation tool box is acceptable.

However I am calling the memorandum's statement spin as an attempt to counter concerns that there may be a managed retreat bias. The memorandum's statement raised suspicions of bias that I did not harbor before.

1 It is well documented that Bob Battalio has advocated managed retreat for at least a decade. That is neither a good or bad thing, and again I think there are situations that it is an appropriate action. Nonetheless his history does suggest his views will be biased towards that solution, and many Pacifican's are well aware of that bias. If the memorandum simply acknowledged that bias, while ensuring us that managed retreat is not predetermined, I would not have been concerned. But because the memorandum did not acknowledge that fact, by simply saying it is not predetermined, avoided the bias issue and raised all my red flags,

Sincerely,

Jim

-----Original Message-----

From: Samuel Casillas

Sent: Apr 24, 2018 5:01 PM

To: Jim Steele

Cc: "o'connorb@ci.pacifica.ca.us" , "gtannura@gmail.com" , "sealevelrise@ci.pacifica.ca.us" , "pguzmanus@yahoo.com" , "jamesnkremer@gmail.com" , "ms.mo.garcia@gmail.com" , "julie.a.lancelle@gmail.com" , "balesl@icloud.com" , "ldcunha16@gmail.com" , "cala3319@gmail.com" , "pacfam5r@pacbell.net" , "constellation747@comcast.net" , "themaykelfamily@sbcglobal.net" , "krishnaswamy.shalini@gmail.com" , "emkoreilly@gmail.com" , "tynipac@gmail.com" , "wehrmeistert@ci.pacifica.ca.us"

Subject: Re: Pacifica SLR Webpage Update - Introduction to Adaptation Strategies Memorandum Posted

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I believe it is disingenuous to call managed retreat spin. You may not believe it is a workable solution but it is an option that CC and the state of California has asked cities to consider.

I understand the emotion where people's homes are taken at risk, I want to make sure it is understood that these misinformed statements about managed retreat are not shared by others on the committee.

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Sent: Tuesday, April 24, 2018 5:01 PM
To: Jim Steele
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Sent from my iPhone

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Comment Form

City of Pacifica Sea Level Rise
Public Meeting
Thursday, April 26, 2018

Name: Lindsey Bales

Organization: ~~City~~ resident / SLR CWG

Email Address: balesl@icloud.com

- What adaptation strategies, if any, need more explanation?

1 ~~Transfer~~ of Development rights → seems counterproductive and not applicable to Pacifica b/c where would we want to intensify development?

2 - How do these strategies affect wild life? How intrusive are they

3 - How can we update current facilities to aid adaptation? (Permeable parking lots, etc.)

- What comments or questions do you have about the application of adaptation strategies in Pacifica?

4 - If the City is not ^{planning to} pursuing policy changes that restrict substantial structural developments on properties, why are deed restrictions / conservation easements even recommended in the memo?

Although this strategy may seem extreme (to some homeowners in Pacifica), land use planning

[over]



General Comments

4 (Cont.)

Highlights from meeting

and other legal mechanisms are important to ensure adaptation measures are continuously being adopted & a standard is clearly set.

short term: beach nourishment

mid term: sea wall, reventments

long term: wetland/shoreline vegetation, hybrid shore protection, retention structure, legal mechanisms

5

(Resiliency & preparation)

Also, what are we doing about creating a more resilient community during catastrophic SLR/events? ^{climate change}
 & toward emergency planning, resources, other services to provide just in case an unpreventable event happens

is important to recognize if we want to ^{continuously} effectively tackle these ^{problems} in future
 Forms can be returned to staff tonight, emailed to sealevelrise@ci.pacifica.ca.us, or mailed to Bonny O'Connor, Assistant Planner at 170 Santa Maria Avenue, Pacifica, CA 94044. Comments will be accepted until May 3, 2018.

Thank you for your input!

Natesan, Sanjana

From: Connie <constellation747@comcast.net>
Sent: Wednesday, May 02, 2018 10:09 AM
To: Sea Level Rise; O'Connor, Bonny
Cc: pacfam5r@pacbell.net; gtannura@gmail.com; Eileen O'Reilly | Your Personal Realtor; jsteele3@ix.netcom.com; o'neill@ci.pacifica.ca.us; Vaterlaus, Sue; Woodhouse, Kevin; Keener, John
Subject: COMMENT: Adaptation Strategies Memorandum

I am writing to submit a comment on the **Adaptation Strategies Memorandum dated April 18, 2018**. I am a member of the Pacifica SLR Community Work Group.

On April 26, 2018, I attended the Public/CWG meeting at the Pacifica Community Center. At the appropriate time during the PowerPoint presentation, I raised my hand to express alarm and concern regarding statements made on page 15 of the Memo under the subheading “**Baseline and Alternative Adaptation Strategies for Pacifica.**” Specifically, I directed the speaker’s (ESA Consultant **Charles Lester**) and attendees’ attention to this sentence towards the end of the first paragraph of this section:

1 “**Of course, with the presumption of armoring, it must also be presumed that most of Pacifica’s beaches will disappear over time, especially with sea level rise.**”

In the Memo and at the meeting, the disappearance of Pacifica’s beaches was unequivocally characterized as an inevitable “trade-off” that Pacifica must accept if it chooses coastal armoring as its preferred adaptation strategy. I requested further clarification from Mr. Lester and he responded that the *presumption* of “disappearance” of Pacifica’s beaches *presumes* armoring without—in the absence of—*any additional hybrid strategies*. My notes from the meeting reflect that Mr. Lester clarified that the City of Pacifica would be able to “**OFFSET THE DYNAMICS** [of passive erosion beach loss—the “trade-off”] **WITH HYBRID STRATEGIES IN CONJUNCTION WITH SHORELINE ARMORING.**”

I believe that the presumptions set forth on page 15 of the April 18, 2018 Adaptation Strategies Memorandum warrant inclusion of the substantive and critical clarification provided by Mr. Lester at the April 26th meeting.

Thank you for your consideration,
 Connie Menefee

Sent from my iPad

Click [here](#) to report this email as spam.

Comments of the Adaptation Memo – James Kremer
May 3, 2018

1 **1. “Bias” of ESA?** Some are concerned for possible bias of ESA, especially with respect to managed retreat as an option. First, this option is required to be included in our LCP Update by our grant award from CCC. Second, I’d like to offer a perspective that I hope will be helpful. I suggest that a professional position based scientific evidence is not the same thing as “bias.” In this case, there is extensive evidence for naturally eroding shorelines from many different scientific sources that shoreline armoring is expensive and always temporary, that marshlands provide relatively long-lasting and cheap protection against storms and surge, and that retreat, especially if managed with hybrid aspects, is sometimes the most appropriate response to extreme hazards. So, professing a position based on such science is more than an opinion, though I guess we could distinguish it as a “professional opinion.” It is not bias – nor a concession to the alarmists – to consider a full range of options especially when including extreme scenarios as we are required to do.

2 **2. Inherent conflict in the Adaptation memo.** I see an inherent conflict between stated goals and at least the extreme case scenarios, i.e. high SLR in 100 yrs time frame. That is, “Goal No. 3 is to Preserve Existing Neighborhoods and Promote Environmental Justice and Local Economic Vitality” and states that “the Adaptation Plan shall protect existing homes, businesses, and infrastructure in Pacifica” (Adaptation Memo). BUT, does anyone really think we could protect by armoring from highest “++ SLR scenario” in a 100 yr scenario?! Both technically and financially, this is a severe challenge and it is prudent to consider retreat and hybrid responses, not bias.

Solution: I suggest the problem is an inherent mismatch: what seems sensible policy in the short term is not sensible in the extreme scenarios we must also consider. A solution is to explicitly consider a range of scenarios AND varied adaptation responses from present to extreme. I know this is planned – at the CWG meeting on Adaptation Memo, James Jackson said the Final VA will include more scenarios. But I don’t think ESA plans to include the full range. Specifically, ESA should include the baseline zero SLR case in addition to the high projections. This was in our proposal and the award, & may help reassure the fearful public.

3. Range of scenarios. How will Adaptation options presented in the final analysis encompass multiple scenarios for every reach?(!) The San Mateo County V. A. does do this explicitly, but it is general and brief. It seems intractable to do this in detail, but I think it is important to distinguish options that are “worst case” from those that might be viable for low SLR cases.

4. Emphasize the hybrids. I’d like to endorse the Hybrid example for Sharp Park, Fig. 15, which adds interior hard protection for Clarendon and W Sharp Park in addition to the Berm. Consider this hypothetical: it is 2037 when remediation permit for Golf Course Berm expires, and sea level has risen a lot. This hybrid scheme is initially a backup, that the City can put in place in advance. But for high

2 (Cont.)

SLR rates, the berm may be lost – intentionally or not – and this sort of contingency make a lot of sense. The Salada wetlands are allowed to function as the most protective AND cost effective buffer; the golf course may be periodically inundated, but the residences, businesses and infrastructure are behind the set-back barriers. This is what I meant in #4, offering various options for extreme scenarios.

3

5. **Beaches undervalued?** I am worried that preservation of beaches is being undervalued.

- Beaches in CA are to be held in **Public Trust** for all. So they have standing but are less formally (& vocally) represented by stakeholders.
- The negative impact of hard armoring on beaches with a naturally eroding shoreline is widely demonstrated and well accepted by coastal science. Importantly, this is the position of the CCC. In the retroactive permit to San Francisco for the Sharp Park Berm (w9a-11-2017-report), the CCC attributed the loss of 8 acres of public beach over 50 yrs to the Sharp Park Berm. (Avg. erosion rate ≈ 2.5 ft/yr \Rightarrow 4.76 ac. in past 27 yrs + 3.5 projected in next 20, a total of 8.3 acres loss over almost 50 yrs). Yet continued armoring appears to be an accepted adaptation option even for extreme scenarios (?). The loss of beaches needs to be explicitly valued. And, economists will compute the total value using a *positive discount rate* (we'll hear about that soon, I expect). This further undervalues the natural assets, which do not have less value in the future.

4

6. **Picky wording Q:** Text repeatedly says, “schedule of maintenance using ... beach width modeling” What does this mean? Since this relates to adaptive accommodation as the future unfolds, it would be worth clarifying. What model(s) would be employed?

Natesan, Sanjana

From: Jessica Pressman <[REDACTED]>
Sent: Monday, April 23, 2018 12:50 PM
To: Sea Level Rise
Subject: Fwd: Residential Adaptation Policy Guidance

Follow Up Flag: Follow up
Flag Status: Flagged

1 I would first like to let you know how much my family and I love our time spent in Pacifica and our home here. Our home on Shoreview has literally become a sanctuary for us. We spend countless hours of uninterrupted family time going for walks along the beach and around the Sharp Park area where we are getting to know many of our neighbors, meeting local shop owners, dining at local restaurants and exploring all that Pacifica has to offer. Every one of these encounters reminds us of why we fell in love with Pacifica in the first place. The community here is so welcoming and down-to-earth. It's this warm and welcoming vibe that I think sets Pacifica apart from other places in the Bay Area that I've lived and it reinforces our decision to purchase a home here.

Our plan has always been to keep this amazing home in our family for many years to come, but recent information we've been hearing seems quite troubling and is causing me serious concern about not only our future here, but of our neighbors and community as well.

I just became aware of the residential adaptation policy guidance document that will create the framework for the City of Pacifica's Local Coastal Plan and have implications that impact the welfare and economics of my home and our community. I do not believe that the residents of Pacifica have been given proper notice to review and comment and I do not believe that any development policy that supports managed retreat is in the best interest of me and my fellow citizens in the town of Pacifica.

2 In specific, the potential adoption by the town council of regulations that support managed retreat will have massive implications on the value of homes and businesses in Pacifica and is policy potentially being adopted without understanding or planning for the implications. For example, who will compensate homeowners and businesses for properties destroyed by these policies? How do you propose that the town pay for the needed relocation of roads, sewers and other public infrastructure? We are already operating at a budget deficit and these additional costs will result in higher taxes for all residents of Pacifica.

Moreover, these policies could destroy billions of dollars of home and business values along the coast which would deeply erode the tax base in Pacifica and would clearly result in much lost business in the town of Pacifica.

I respectfully request that the council consider the taking the following two actions on behalf of the citizens you represent:

1. Request that that the California Coast commission give a one year extension for the public comment period on their plans. I also would also like to request that workshops be held in our communities and all stakeholders be given an opportunity to comment on this very detailed technical report that will impact our livelihoods and neighborhoods for the next 82 years. I believe it is a violation of our rights as citizens and owners to have a document approved that will set the framework for our local coastal plan without proper notification and our input.
2. I request that the council reject changes to the building and development guidelines that support these policies of managed retreat that will result in
 1. The loss of residential and commercial property
 2. The significant erosion of our tax base as a result of the loss of property and people
 3. Massive additional unfunded costs to relocate infrastructure that will surely result in higher taxes to everyone in Pacifica

2 (Cont.)

I have spoken to over 15 other residents of Pacifica and all of them agree that we need more time to review the Coastal Commission document and that the town council should not approve these policies that will have very significant negative impact on the residents of Pacifica.

Thank You-

Jessica Pressman

██████████ Shoreview Ave.

Jessica Pressman

████████████████████
CaIBRE ████████████████████

www.jesspress.com

www.zillow.com/profile/jmn-res/

Click [here](#) to report this email as spam.

Natesan, Sanjana

From: Stan Zeavin <[REDACTED]>
Sent: Tuesday, April 24, 2018 10:18 AM
To: Michael O'Neill; Deirdre Martin; John Keener; Sue Digre (Contact); Vaterlaus, Sue; Wehrmeister, Tina; O'Connor, Bonny; Woodhouse, Kevin
Subject: Fw: Managed Retreat
Attachments: Del Mar reluctantly adds 'managed retreat' to coastal erosion options - The San Diego Union-Tribune.pdf

Hi Everyone,

1 | By including managed retreat in our LCP, it looks like Pacifica may have dodged a bullet. It looks like the State of California along with the California Coastal Commission has now stated that 'managed retreat' must be "one of the tools in the toolbox."

People all over the California coast have the same concerns and are wrestling with the same issues as Pacificans! We can learn and benefit from the struggles of others. Let's keep moving forward.

Best regards,

Stan and Margaret

FYI. From Hal Bohner. Headline: Del Mar reluctantly adds 'managed retreat' to coastal erosion options

http://www.sandiegouniontribune.com/communities/north-county/sd-no-managed-retreat-20180417-story.html?utm_campaign=CELP&utm_source=hs_email&utm_medium=email&utm_content=62268170&hsenc=p2ANqtz-9o_WbcQ08Gp9AJtuYtq2Eqe6tJijKzg_RZJNxHp66ASmuMPcDBGp9kXcp7bQMl4hpCjYOMKISUmb2yjX1XvW2iWtOQUg&hsmi=62268170

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Del Mar reluctantly adds 'managed retreat' to coastal erosion options



Drew and Kristine Dyck enjoy the ocean air from the seawall at the 29th Street beach access in Del Mar in 2017. (Union-Tribune file photo by Bill Wechter)



By **Phil Diehl**

APRIL 17, 2018, 3:00 PM | DEL MAR

Del Mar has decided to include “managed retreat” as a last-resort option for dealing with sea-level rise, despite widespread objections from homeowners in the tony, seaside enclave.

The California Coastal Commission, in two letters to the city, has emphasized that managed retreat must be “one of the tools in the toolbox,” city officials said at a Monday night council meeting.

Without it, the city would lose control to the state over development of everything from seawalls to shopping centers.

Managed retreat is a term that describes planning for ways to remove homes, roads, public buildings and other structures from the path of the rising sea. In some cases, it could involve the government buying the properties,

http://www.sandiegouniontribune.com/communities/north-county/sd-no-managed-retreat-20180417-story.html?utm_campaign=CELP&utm_source=hs_email&utm_m

or assisting in the sales, and helping the residents find new places to live.

The idea is especially controversial in Del Mar, where hundreds of multimillion-dollar homes are built near sea level on the northern end of town near the beach and the San Dieguito River. Del Mar residents and city officials say they intend to cope with sea-level rise using a combination of beach replenishment, sand retention and flood management projects.

Residents, backed by the city's Sea-level Rise Stakeholder Technical Advisory Committee and the Planning Commission, had said that under no circumstances should managed retreat be considered for Del Mar.

However, the City Council voted Monday to include the idea as an option, and to postpone approval of the adaptation plan until the council's May 21 meeting to iron out the details.

Residents fear their property values will plummet if word gets out that the city is considering managed retreat.

"Uttering these words alone ... may have pulled the emergency brake on sales," real estate agent Csilla Crouch said Monday.

Six beachfront homes are for sale in Del Mar, she said, but in the past 15 months, only one has sold, though it went for \$18 million.

"The conversations have done damage enough," Crouch said. "Please delete this concept entirely."

The Coastal Commission insists that managed retreat be addressed in the city's mandatory sea-level rise adaptation plan, said Mayor Dwight Worden, who's also been the Del Mar city attorney and is familiar with the legal side of Coastal Commission issues.

"We must include this option," he said, even if it's unlikely to ever happen. "We specifically said it's infeasible. Planned retreat is going to be very difficult and complex if we ever need to implement it. The city has no confidence in it based on various uncertainties."

Jon Corn, an attorney for a property owners group called the Beach Preservation Coalition, said the idea of managed retreat is based on the fallacy that "if you let nature take its course, you'll end up with a more usable or walkable beach."

Much of the North County coast consists of steep bluffs, and "those bluffs will never reach a safe angle of repose," Corn said. "We will continue to get failures that can, and have, killed people."

Also, the expense of relocating some public facilities, such as the bluff-top railroad tracks in Del Mar, are likely to be prohibitively expensive.

"The answer is sand replenishment and sand retention," Corn said. "Managed retreat is all downside with no upside. It is an anxiety-driven thing that does nobody any good."

The city's sea-level rise committee has been working for three years on the proposed adaptation plan which, when approved by the city and the Coastal Commission, would become an amendment to Del Mar's Local Coastal Program. The adaptation is intended to protect the city's beaches, bluffs and coastal resources for generations.

The consensus of scientific opinion is that sea level will continue to rise, and that storms will continue to increase in frequency and intensity, Del Mar Principal Planner Amanda Lee said Monday.

Del Mar can expect continued narrowing of the public beach, erosion of coastal bluffs, increased flooding and storm damage, Lee said. Adaptation planning is complex, strategies are untested, all options carry extensive financial environmental costs, and no funding has been identified.

"We are looking to protect people and property, and to help owners protect their property," Lee said.

Councilwoman Ellie Haviland said Del Mar needs to get its plan approved to stay in sync with other coastal cities, all of which depend on sand restoration projects.

"The plan we have tonight is the best shot we have at keeping our beaches as long as possible," Haviland said. "It focuses on the things that we can implement quickly and get started on right away. If at some point in the future, those strategies fail, it doesn't leave us with no options."

Carlsbad and Imperial Beach have already adopted their adaptation plans, including the option of managed retreat, and Oceanside and Solana Beach are working on theirs.

philip.diehl@sduniontribune.com

Twitter: @phildiehl

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O'Connor, Bonny

From: [redacted]@gmail.com on behalf of Cheryl Greene [redacted] >
Sent: Thursday, May 03, 2018 11:28 PM
To: Sea Level Rise
Subject: Comments re: Pacifica Sea Level Rise

Name: Cheryl Greene
Organization: Potential Homeowner [redacted] Montecito Ave, Pacifica, CA 94044
Email Address: [redacted]

What adaptation strategies, if any, need more explanation?

- 1. Policies that place restrictions on the remodeling of homes and/or protection of seawalls and revetments that will lead to the damage and/or destruction of homes, businesses and city infrastructure. These policies could bring down the value of Pacifica property and may increase the cost of living and working in Pacifica.
- 2. In the past, the town council has specifically approved the upkeep of all existing revetments in Pacifica. How do policies fit within the Town Council direction?
 - a. Specific clarification should be provided on how the town of Pacifica intends to treat the maintenance of seawalls and revetments that are publicly owned.
 - b. Specific clarification should be provided as to what restrictions, if any, will be placed on private owners of homes as it relates to the maintenance of their seawalls and revetments
- 3. More information is needed to explain how the town is going to pay for the costs that result from implementing the adaptation strategies. The plans do not currently have estimates of cost and a plan to pay for the additional costs. Specific items that need to be paid for include the movement of city infrastructure (e.g. sewers, gas lines, public buildings) from the damage caused by the new policies.

What comments or questions do you have about the application of adaptation strategies in Pacifica?

- 2 1. I believe that these policies have many components that are short-sighted, unfair and may be illegal.

General Comments:

- 3 1. The current process is not giving adequate data to Pacifica citizens so we can all understand the implications to our homes and the businesses in Pacifica.
- 2. I believe that any public policy with impacts as far reaching and expensive as those resulting from this policy should be clearly analyzed and assessed and disclosed to the public, so they can make an informed decision.
- 3. I believe these policies may result in:
 - a. The loss of significant tax revenue to the town by the destruction of properties that currently pay taxes.
 - b. Significant tax increases caused by the destruction of city infrastructure that are not clearly understood nor disclosed.
 - c. The destruction of a significant portion of the economic well-being of Pacifica by allowing much of the current tourist areas, hotels and businesses to be destroyed.

Thank you for considering my comments.

C~
Cheryl Greene
Co-Founder & Executive Producer, DrGreene.com



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O'Connor, Bonny

From: [REDACTED]@gmail.com on behalf of Dr. Greene [REDACTED] >
Sent: Thursday, May 03, 2018 11:11 PM
To: Sea Level Rise
Subject: Comments

Name: Alan Greene, MD
 Organization: DrGreene.com
 Email Address: [REDACTED]

What adaptation strategies, if any, need more explanation?

1. I was in contract to purchase the home at [REDACTED] and decided to pull out of the contract in light of the April 26 meeting. I was very sad to do so. The property was in need of significant remodeling, [REDACTED], which I was excited to do, but the ambiguities in the regulations made it unclear whether I would be able to do the needed remodeling and still maintain the revetments. I believe that most of the proposed polices that would not allow land owners (public and private) to maintain existing ocean protection including seawalls and revetments are not actually legal and will fail to be upheld in a court of law. I do not see any explanation of the legality of policies that specifically place restrictions on the remodeling of homes and/or protection of seawalls and revetments that will lead to the damage and/or destruction of these homes, businesses and city infrastructure. But I did not have the bandwidth to enter this fight at this time.
2. How these policies fit within the Town Council direction needs more explanation. The town council has specifically stated and approved that all existing revetments in Pacifica will be allowed to be mainlined.
 - a. Specific clarification should be provided on how the town of Pacifica intends to treat the maintenance of seawalls and revetments that are both publicly owned.
 - i. The adaptation guidelines should specify what revetments will be maintained by the city. This explanation should clearly state how these policies work within the guidelines proposed by the California Coastal Commission and should make totally clear that the Pacifica policies to maintain these seawalls and revetments are allowed under the Coastal Commission guidelines.
 - b. Specific clarification should be provided as to what restrictions, if any, will be placed on private owners of homes and residences as it relates to the maintenance of their seawalls and revetments. This topic was specifically discussed at the meeting on 4/26/18 but the speakers were very ambiguous as to the relationship of remodeling homes and the ability to maintain revetments and seawalls.
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 - a. Paying for the movement of city infrastructure (e.g. sewers, gas lines, public buildings) from the damage caused by these new policies.

What comments of questions do you have about the application of adaptation strategies in Pacifica?

1. I believe that these policies have many components that are short-sighted, unfair and illegal.

General Comments:

1. In general, I feel that these policies are being put forward with an agenda of managed retreat that is only supported by a small portion of Pacifica residents and the process is not giving adequate data to citizens to understand that these policy makers have a specific agenda.
2. Moreover, I believe that these policies have not adequately assessed the very significant economic impact to the town of Pacifica. I further believe that the teams working on these projects have not fulfilled their responsibilities to all residents of Pacifica to understand the full economic impact to Pacifica. I believe that any public policy with impacts as far reaching and expensive as those resulting from this policy should be clearly analyzed and assessed and disclosed to the public, so they can make an informed decision.
3. To be clear, I believe you are making policy without any true understanding of the costs and impacts to the residents of Pacifica. I believe that this will, at a minimum, result in:
 - a. The loss of significant tax revenue to the town by the destruction of properties that currently pay taxes
 - b. Significant tax increases that are not clearly understood nor disclosed.
 - c. The destruction of a significant portion of the economic well-being of Pacifica by allowing much of the current tourist areas, hotels and businesses to be destroyed.
 - d. Lawsuits against the town for creating policy that clearly violates laws relating to the protection of public and privately owned property.

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Name: Jason Pressman
Organization: Homeowner, [REDACTED] Shoreview Ave, Pacifica, CA 94044
Email Address: [REDACTED]

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1 (Cont.)

Natesan, Sanjana

From: Jessica Pressman <[REDACTED]>
Sent: Thursday, May 03, 2018 1:41 PM
To: Sea Level Rise
Subject: Comments for review

Follow Up Flag: Follow up
Flag Status: Flagged

Name: Jessica Pressman

Organization: Homeowner, [REDACTED] Shoreview Ave, Pacifica, CA 94044

Email Address: [REDACTED]

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Jessica Pressman

CaIBRE

www.jesspress.com

www.zillow.com/profile/jmn-res/

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Name: Jason Pressman

Organization: Homeowner, [REDACTED] Shoreview Ave, Pacifica, CA 94044

Email Address: [REDACTED].com

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1 (Cont.)

SAN FRANCISCO
PUBLIC GOLF ALLIANCE



██████████ Masonic Ave., San Francisco, CA 94117 • ██████████ • ██████████

May 3, 2018

Pacifica City Planner Lisa Wehrmeister
Pacifica City Manager Kevin Woodhouse
170 Santa Maria Ave.
Pacifica, CA. 94044

Re: SF Public Golf Alliance Comments on SLR Adaption Background Memo

Dear Ms. Wehrmeister and Mr. Woodhouse,

We have previously submitted letters in the matter of Pacifica's sea level rise adaption planning process, dated March 26¹, March 14², and January 22, 2018³ and September 18, 2017,⁴ which letters we link in the footnotes below and incorporate herein by this reference.

Herewith our comments on the Memorandum, dated April 18, 2018 from the City's consultant ESA, entitled "Pacifica Sea Level Rise Adaption Background and Example Strategies" (the "Adaption Memorandum").

1. San Francisco's Coastal Development Permit application for the Sharp Park levee – granted by the California Coastal Commission on Nov. 8, 2017 – was for the purpose of protecting the Golf Course and the endangered frog and snake species that inhabit its wetlands.

1 The Adaption Memorandum incorrectly states, at page 3, fifth and sixth lines, that San Francisco requested a coastal development permit for the Sharp Park levee "in order to prevent flooding in the West Sharp Park neighborhood." While protection of Pacifica's residential neighborhoods is certainly an important function of the Sharp Park levee, that is not its only function. As stated in the Coastal Commission Staff Report, the functions of the Sharp Park levee include protection of the coastal recreational values of the golf course and the

¹ Letter, San Francisco Public Golf Alliance to Pacifica City Council, Mar. 26, 2018
<https://drive.google.com/open?id=1a-zcVQINvx3CPb-TAJoW7iz8OV5Y-cT6>

² Letter, San Francisco Public Golf Alliance to Pacifica Planning Department, Mar. 14, 2018:
<https://drive.google.com/open?id=1u-aae0CYuTA4Ovxs24Bo5XcOsjHhlpzT>

³ Letter, San Francisco Public Golf Alliance to Pacifica Planning Department, Jan. 22, 2018:
<https://drive.google.com/file/d/1ya0QcH6OZIJ3Xe7CUoiTGNmSP9XKOj7O/view?usp=sharing>

⁴ Letter, San Francisco Public Golf Alliance to Pacifica Planning Department, et al., Sept. 18, 2017:
https://drive.google.com/file/d/1LCky3VD_IVN6EWANBRN_WmKLSDaNbt9B/view?usp=sharing

California Coastal Trail atop the levee, as well as protection of the resident endangered frog and snake populations in the Sharp Park wetlands.

1 (Cont.)

The proposed armoring structure is designed to protect the existing Sharp Park Golf Course, as well as wetlands on the golf course site that provide critical habitat for sensitive species, including the California red legged frog and the San Francisco garter snake, and that the Commission has deemed environmentally sensitive habitat areas under the Coastal Act.² The Golf Course provides an affordable, visitor-serving recreational opportunity open to the public at a lower cost than most other golf clubs in the area, many of which are private and require membership fees. In addition, the armoring structure itself currently serves as an important public access resource by providing a heavily used pedestrian path along the top of the berm parallel to the shoreline. This path is an important part of the California Coastal Trail in this area, connecting parking areas and the recreational pathways located near Pacifica Pier to the north to additional hiking trails at Mori Point located just south of Sharp Park.⁵

2. There has been no appreciable erosion of the beach at the Sharp Park levee since the levee was built in the 1980's.

2

The Adaption Memorandum makes an over-broad statement that “beaches and access have largely been lost where the armoring has occurred”. (Adaption Memorandum, at page 5). This is not true at all beaches. Each beach is unique in location, orientation, topography, and geologic features, so analysis of beach erosion is not a one-size-fits-all proposition. Specifically, the beach fronting the Sharp Park Golf Course has in fact not been eroding since the levee was erected in the late 1980's.⁶ Bob Battalio, project manager of ESA's Pacifica sea level rise study, explained to an April 26, 2018 public meeting of Pacifica's SLR Community Work Group, that Sharp Park Beach remains wide, despite the presence of the levee, because the beach's northwesterly orientation faces directly into the predominant direction of the waves, and Mori Point, which adjoins the beach immediately to the south, acts as a “big jetty or groin,. . . inhibiting the sand transport from driving the sand further south, and so the sand kind of piles up” at Sharp Park beach.⁷

3. Rough estimates of some of the costs of losing the Sharp Park levee

3

The California Coastal Commission in its November 8, 2017 decision to grant San Francisco a Coastal Development Permit for the Sharp Park levee, rejected the managed retreat alternative, and found that managed retreat would be “. . . infeasible because it would be extremely costly (estimated in the tens of millions of dollars) and it is unclear if a golf course could even be relocated inland at this location. In addition, it is infeasible due to the mandates the Applicant is under [from the US Fish and Wildlife Service, Army Corps of Engineers, and

⁵ California Coastal Commission Staff Report, CDP Application No. 2-17-0702, at page 2 [Application No. 2-17-0702 \(San Francisco Recreation and Parks Department, Pacifica\)](#)

⁶ The facts are set forth in a Letter, dated Feb. 19, 2016, from SF Public Golf Alliance to Coastal Sediment Management Workgroup, Susan M. Ming, Project Manager, which letter is incorporated herein by this reference: <https://drive.google.com/file/d/0B1h0x8Eg99deOUU1Nmx0M2txa2M/view?usp=sharing>

⁷ Video of the April 26, 2018 public meeting of the Pacifica Sea Level Rise Community Work Group, <https://www.youtube.com/watch?v=hh4iFYrVun4&feature=youtu.be>, at 1:02:50 through 1:04:30. Mr. Battalio was responding to a question from a Community Work Group member, asking for an explanation of how a wide beach persists at Sharp Park, long after the existing levee was built in the 1980's.

California RWQCB] to protect existing habitat for the CRLF and the SFGS [the California red-legged frog and San Francisco garter snake].”^{8, 9}

Following are our rough estimates of economic losses at the Sharp Park Golf Course that would result from implementation of a “managed retreat” strategy at the Sharp Park levee.

3 (Cont.)

Loss of Golf Course Property	\$21.8 Million (in 2010 dollars) ¹⁰
Loss of Public Recreation Value at the golf course	At least \$9 Million ¹¹
Loss of golf and Clubhouse commercial businesses	At least \$9 Million ¹²
Waste of 78% of the cost of the Pacifica Recycled Water Project	\$7.8 Million ¹³

⁸ California Coastal Commission Staff Report, CDP Application No. 2-17-0702, at page 21 [Application No. 2-17-0702 \(San Francisco Recreation and Parks Department, Pacifica\)](#)

⁹ In passing the Resolution to approve San Francisco’s CDP Application No. 2-17-0702, the Commission adopted the Staff’s findings: California Coastal Commission Staff Report, CDP Application No. 2-17-0702, at page 4 [Application No. 2-17-0702 \(San Francisco Recreation and Parks Department, Pacifica\)](#). And see the CalSpan video of the Commission’s Nov. 8, 2017 public meeting, <http://cal-span.org/unipage/?site=cal-span&owner=CCC&date=2017-11-08>, at Agenda Item No. 9a, at 2:38:50 (motion) and 2:44:10 (vote)

¹⁰ The \$21.8 Million figure (measured in “2010 dollars”) is conservative, representing 50 acres (one-half of the approximately 100 acres of golf course west of the Coast Highway), at \$435,600 per acre (calculated at \$10 per square foot in “2010 dollars,” which is the figure used for public land in the Mori Point/Sharp Park area by Pacifica’s consultant ESA, in its San Francisco Littoral Cell Coastal Regional Sediment Management Plan Draft (Jan., 2016): http://www.sfestuary.org/wp-content/uploads/2015/11/SFLC_CRSMF_Appendices_Jan2016.pdf, Economic Analysis Appendix, at page F-10 (the 131st page of the Combined Appendices).

¹¹ The \$9 Million is the present value of \$1 Million in annual greens fees collected at Sharp Park, over the period 2015-2050, subject to a 4% discount rate. This is a very conservative estimate, based on the low end of Sharp Park’s annual reported greens fee income, and upon Sharp Park’s moderate greens fee structure.

¹² The \$9 Million is a rough estimate of the present value of the combined bar-restaurant business at the Clubhouse (with approximate \$1 Million annual gross receipts, 10 fulltime employees, and at least 20 part-time employees), together with the greenskeeping operation at the golf course, whose City of San Francisco maintenance employees have combined annual salary and benefits of approximately \$800,000. (See the SF Rec & Park Department’s Golf Revenue & Expenditure Report 2013-2014: <https://drive.google.com/open?id=0B1h0x8Eg99deX3I2TIVUZGRqems>)

¹³ The golf course is the designed user of 78% of the capacity of the \$10 Million Pacifica Recycled Water Project, project, a joint venture of the San Francisco PUC and Pacifica’s North Coast County Water District, specifically designed to deliver recycled water from Pacifica’s Calera Creek water treatment plant to irrigate the golf course. The recycled water delivery system was hooked-up in October 2014 to the four holes that lie east of the Coast Highway— approximately 22 percent of the 18-hole golf course. But the remaining 14 holes lying west of the highway have not to date been hooked-up, leaving approximately 78% of San Francisco’s recycled water entitlement unutilized. See: Pacifica Tribune, Nov. 4, 2014, “Recycled Water Now Used on Sharp Park...”: http://www.mercurynews.com/pacifica/ci_26864797/recycled-water-now-used-sharp-park-golf-course; San Mateo County Times, July 8, 2009, “Pacifica Golf Course, Parks, to Use Recycled Water”: http://www.insidebayarea.com/sanmateocountytimes/localnews/ci_12787178; and Kennedy/Jenks Consultants, “Pacifica Recycled Water Project Facilities Planning Report, Dec., 2004, Cover Letter, Dec. 20, 2004 and pp. 1, 23-25. <http://www.sfwater.org/modules/showdocument.aspx?documentid=2481>

3 (Cont.)

Loss of storm drain pump and infrastructure at Horse Stable Pond:	\$3 Million (estimated)
Loss of Alister MacKenzie Architectural Heritage:	Yet to be determined ¹⁴
Loss of endangered snakes and frogs and their freshwater lagoon habitat at Sharp Park	Yet to be determined ¹⁵

A conservative estimate of the combined total economic cost of these losses would be a present value well in excess of **\$50 Million**, plus the yet-to-be determined values of the lost architectural and historical heritage, the losses of the endangered San Francisco garter snake and California red-legged frog and their freshwater habitat in the Sharp Park wetlands, and the losses of private residential and commercial property in the surrounding West Sharp Park and West Fairway Park neighborhoods. We will attempt to evaluate these losses in a subsequent letter.

Very truly yours,

San Francisco Public Golf Alliance

Richard Harris

Richard Harris, President

cc:

Pacifica City Council
Pacifica Public Works Department
Bonny O'Connor, Assistant Pacifica Planner
San Francisco Recreation and Park Department
Congresswoman Jackie Speier
State Senator Jerry Hill
Assemblyman Kevin Mullin
San Mateo County Board of Supervisors
California Coastal Commission, North-Central Coast District
San Mateo County Office of Sustainability
U.S. Army Corps of Engineers, Susan M. Ming, PE
Bo Links

¹⁴ Sharp Park is an Alister MacKenzie seaside public links course. This is a priceless heritage asset, recognized as Historic Resource Property by both San Francisco and Pacifica.

¹⁵ We will in a subsequent letter suggest ways to an economic value for the loss of these animals and their habitat

Natesan, Sanjana

From: Cindy Abbott <cala3319@gmail.com>
Sent: Tuesday, May 08, 2018 10:26 AM
To: Sea Level Rise
Cc: Wehrmeister, Tina
Subject: Re: Pacifica SLR Webpage Update - Economic Analysis Methodology Memorandum Posted

Hello Bonnie,

A few comments in advance of Thursday's meeting:

- 1 • For me, a key to the document is on page 8. The economic analysis can be used to **inform adaptation decisions**. It provides the opportunity to make *comparisons between various strategies*. This key though noted in the fourth bullet point isn't presented as clearly as on page 8. I find this clarification important as otherwise I can see long discussion about each specific economic measure/valuation, which are important to understand, but individually maybe not as critical as how the information is viewed collectively and in comparison.
- 2 • It's not clear in the Executive Summary that this analysis must be done with valuations at a specific point in time. The document extends costs into the future (referencing the time value of money and how inflation and other factors could change what is being presented). I'd suggest adding some language to the second bullet point and also stress that the valuations are for **planning purposes**. Or clarify if there is timing for future updates to the valuations.
- 3 • Other Coastal Recreation (page 5): No mention of the pier?
- 3 • Infrastructure Replacement (page 6): No mention of street lighting (included in transportation for road?), electrical, gas? Only Comcast conduit is listed - other telco service providers? or is the Comcost amount applicable to all (ATT, etc.)
- 4 • Economic Impacts (page 6-7): Lists that revenue of hotels is proprietary information. Aren't taxes and information from the BID public record?
- 5 • The Future (page 7): Paragraph 3 brings up... "even a relatively low discount rate can imply that benefits and costs for future generations are valued far less than current benefits and many economists have argued that the social discount rate should be lower than the market cost of capital." I think it important that emphasis be on the future, incorporating at the right time the definition of sustainable development -- meets the needs of the present without compromising the ability of future generations to meet their own needs. Concerned that decisions will be shortsighted and for the near-term, which I don't feel is the appropriate to the intent of this process.

Thanks for the opportunity to provide comment. See you Thursday evening.
 Cindy Abbott

On Fri, May 4, 2018 at 12:23 PM, <sealevelrise@ci.pacifica.ca.us> wrote:

Hello CWG,

The Economic Analysis Methodology Memorandum has been posted to the Sea Level Rise webpage at www.cityofpacifica.org/sealevelrise. We would like you to read this memo and provide constructive feedback to staff by Tuesday, May 8, 2018 (5pm) that will highlight for staff and the consultant what information may

Natesan, Sanjana

From: Gordon Tannura <gtannura@gmail.com>
Sent: Sunday, May 06, 2018 8:48 PM
To: Sea Level Rise; O'Connor, Bonny
Cc: Sea Level Rise; O'Connor, Bonny; pguzmanus@yahoo.com; James Kremer; Maureen Garcia; julie.a.lancelle@gmail.com; balesl@icloud.com; Samuel Casillas; ldcunha16@gmail.com; Cindy Abbott; Robine Runneals; Jim Steele; Connie; ron maykel; krishnaswamy.shalini@gmail.com; Eileen O'Reilly | Your Personal Realtor; tynipac@gmail.com; Wehrmeister, Tina
Subject: Re: Pacifica SLR Webpage Update - Economic Analysis Methodology Memorandum Posted

Bonny,

I have the following constructive feedback for consideration and clarification at the upcoming meeting:

- 1 - It should be well-stated from the beginning that the estimates are just that - estimates. There is the potential for them to become thought as more than that, and even thought of as with some precision. Consideration should be made to well-defining each estimation technique and its degree of certainty (e.g., + or - 25%).
- 2 - Construction inflation is generally greater than consumer inflation. From sources on a Construction Analytics site I found, "Long term construction cost inflation is normally about double consumer price inflation. Since 1993, long-term annual construction inflation for nonresidential buildings has averaged 3.5%, even when including the recessionary period 2007-2011. During rapid growth periods, inflation averages more than 8%. Construction spending growth for the four-year period 2013-2016 totals 39% and remains near equal with the four-year high. How will the difference between the consumer and construction inflation rates be factored in to costs, especially for 2050 and 2100 scenarios? How might this relate to the discount factor identified very briefly (and without adequate elaboration) in "the Future" section?
- 3 - As with current homeowner policies, replacement cost can, or cannot, include code upgrades. Those codes might become even more extensive with climate change. Are such upgrade costs factored into the replacement cost for structures?
- 4 - Beyond property values, reconstruction, and modification costs, there are costs associated with relocation and disruption (e.g., moving costs, lost wages, funding for new locations) that must be accounted for in the event of abandonment to the estimated hazard exposure boundaries. Further to abandonment, there needs to be modeling of lost tax revenue lost for such properties, and the impact of that on city funding. Perspectives on lost businesses, and their impact on tax revenue and local employment, should also be represented. Similarly, there will be an impact to businesses that may be directly affected, but also those that may "survive". There should at least be an acknowledgement of that.
- 5 - Please define the extent of engineering cost estimates (what do they include).
- 6 - It will be helpful to, as clearly as possible, delineate public vs. private costs by property for a given adaptation strategy.
- 7 - I do not see the value in using any of the county's property values / parcel data for assessed value at all, or use only those for properties sold in the last year or 2. I see no mention of using the data in the summary table... ??

- 7 (Cont.) - Please clarify why a different approach is used for valuation of private property for < 1/4 for > 1.4 acre.
- 8 - Please define or describe the housing price index (HPI) formula.
- 8 - You cannot value the Sharp Park golf course as measured by its use!!!! That may provide a figure for lost revenue for a period of time, but in no way can it be equated with that beautiful piece of land. Use professionals to value its worth, as a golf course.
- 9 - I do not see any mention of gas or electrical lines in Table 2.
- 10 - Are capital costs to be included, or not? As noted above, for “The Future”, the further analysis method needs to be more fully elaborated.

Thank you for the chance to review before the meeting. See you Thursday.

Sincerely,

Gordon Tannura

On May 4, 2018, at 12:23 PM, sealevelrise@ci.pacifica.ca.us wrote:

Hello CWG,

The Economic Analysis Methodology Memorandum has been posted to the Sea Level Rise webpage at www.cityofpacifica.org/sealevelrise. We would like you to read this memo and provide constructive feedback to staff by Tuesday, May 8, 2018 (5pm) that will highlight for staff and the consultant what information may need to be improved or clarified during the public meeting presentation. We would also like you to attend the public meeting/Community Work Group meeting on Thursday, May 10, 2018 at the Pacifica Community Center (6:00pm - 9:00pm).

We are continuing to expand our notification to the community of our sea level rise planning efforts. We hope by now that you have received the postcard that we sent citywide in the mail. Additionally, a notice for this meeting will be in next week's Tribune and we are sending notifications through our sea level rise mailing list, NextDoor account, and Connect with Pacifica e-newsletter. However, we still need your assistance in helping us inform and encourage the public to attend this meeting. Please post or share information about this meeting on your personal social media accounts or through your community groups.

Please let me know if you have any questions.

Thanks,
Bonny

Bonny O'Connor, AICP
Assistant Planner
Planning Department
City of Pacifica
1800 Francisco Blvd.

Natesan, Sanjana

From: James Kremer <jamesnkremer@gmail.com>
Sent: Wednesday, May 16, 2018 12:17 PM
To: O'Connor, Bonny
Subject: Comments on the Econ Analysis memo

--- Comments submitted on Econ Analysis by Phil King

1. The value of Public Trust lands (beaches) should be flagged as minimal underestimates in text and tabular summaries that present and compare valuations. Beaches are underrepresented in our process, facing bias since they are unable to balance the vocal stakeholders and straightforward valuation for built assets. The daily use/attendance estimate (as recommended by the CCC) may “fill in the box” in the tally, but it does not include the wide range of values that natural lands can be assigned using a range of ecological economists’ non-market value tools. Ecosystem services, and existence and others are substantial and are neglected. Even if all appropriate non-market measures were added together, it would not capture the full value.

2. I strongly urge Pacifica NOT TO RELEASE individual property valuations. Dr. King said at the CWG meeting that he did not plan to, but he could, release valuations for individual properties (residences and businesses). King should stick to his plan. Indeed, it would help if this were a specifically endorsed policy by the City, by ESA, as well as Dr. King. It seems clear to me, much public protest is based on the fear that their property values will be wrong, or will somehow affect their future use. (This has been fanned by anonymous handbills to some residents, but letters to the Tribune, and by statements of real estate interests.) It seems clear to me that this is not a real concern in this long-term risk assessment planning process. All this fear can be avoided by a firm policy only to release aggregate estimates.

Additional comments, from the CWG meeting but not on the Econ. Analysis, *per se*.

3. The historical erosion rates for various reaches of our coastline, which are used by ESA in some hazard and accommodation estimates, should be explicitly released to the public. It could be added as a table in a report. I urge this because: a) it will help much of the public to appreciate that the risks we are assessing are and have been ongoing, perhaps defusing some of the public mistrust and fear; and b) these numbers are critical to the model predictions, and deserve to be reported in open documents.

4. In the LCP-SLR Update overall process, is there a place for municipal action to incentivize desirable behavior by Pacificans? I think zoning policies that encourage raising homes or businesses, remodeling ground floors to minimize damage, and certainly building new structures in SLR protective ways make sense. These could provide benefits/incentives, such as tax breaks or rebates, or something else creative (?). Such changes could be put in place early, and would be proactive but less aggressive than zone restriction the require things, that might come into play later, as SLR is more evident.

-- Jim

James Kremer
Pacifica, CA
jamesnkremer@gmail.com

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Natesan, Sanjana

From: ron maykel <themaykelfamily@sbcglobal.net>
Sent: Thursday, May 17, 2018 4:37 PM
To: O'Connor, Bonny
Subject: California Coastal Trail

For: Local Coastal Plan, Sea Level Rise update consideration.

Please indicate within the narratives of shoreline pedestrian walkway protection, where designated, as the California Coastal Trail, CCT. For example, Rockaway Beach, the Beach Boulevard Promenade, the Sharp Park Levee etc.

As you know the intended CCT route extends the entire length of Pacifica north to south and it has many significant east/west laterals. The CCT both eclectic in experience and enigmatic in route definition due to way-finding gaps and weaknesses, is very significant as a multiple community connector with recreational and economic asset values.

1 Currently several segments of the trail in Northern Pacifica are rerouted or closed due to safety concerns regarding the proximity of bluff top loss due to erosion. Alternate routes for the future should be incorporated into the Local Coastal Plan Update. As you know the California Coastal Commission and its Conservancy have a considerable amount of vested interest in the CCT, as does Pacifica.

Also more thoughtful vetting of memorial bench placement in the coastal zone should be considered.

Thanks

Ron Maykel
SLR Community Workshop Member

CC

Pacifica Mayor, Council, City Manager
Environmental Science Associates
SLR Community Work Group
San Mateo County's Pacifica District Supervisor
Hilary Walecka State Coastal Conservancy

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Natesan, Sanjana

From: Samuel Casillas <samuelcasillas@hotmail.com>
Sent: Tuesday, May 08, 2018 5:08 PM
To: Sea Level Rise
Subject: Re: Pacifica SLR Webpage Update - Economic Analysis Methodology Memorandum Posted

Hi Bonnie,

I appreciate the opportunity to comment on the EAMM. I understand the estimates are not going to be perfect and this memo goes a long way into explaining why these may be the bst we can do.

I do have one comment around the economic value of recreational assets. According to the methodology we will be using "WTP" defined as "how much consumers would be willing to pay for a day at the beach (willingness to pay or WTP)".

Can there also be clarification as to why we would not also include business losses/tax losses for tourists coming to use the beaches/trails/golf course and the losses we wold incur if those tourists no longer came to spend money on the recreational assets if they were to disappear?

Thanks
 Sam

From: sealevelrise@ci.pacifica.ca.us <sealevelrise@ci.pacifica.ca.us>
Sent: Friday, May 4, 2018 3:23 PM
To: sealevelrise@ci.pacifica.ca.us
Subject: Pacifica SLR Webpage Update - Economic Analysis Methodology Memorandum Posted

Hello CWG,

The Economic Analysis Methodology Memorandum has been posted to the Sea Level Rise webpage at www.cityofpacifica.org/sealevelrise. We would like you to read this memo and provide constructive feedback to staff by Tuesday, May 8, 2018 (5pm) that will highlight for staff and the consultant what information may need to be improved or clarified during the public meeting presentation. We would also like you to attend the public meeting/Community Work Group meeting on Thursday, May 10, 2018 at the Pacifica Community Center (6:00pm - 9:00pm).

We are continuing to expand our notification to the community of our sea level rise planning efforts. We hope by now that you have received the postcard that we sent citywide in the mail. Additionally, a notice for this meeting will be in next week's Tribune and we are sending notifications through our sea level rise mailing list, NextDoor account, and Connect with Pacifica e-newsletter. However, we still need your assistance in helping us inform and encourage the public to attend this meeting. Please post or share information about this meeting on your personal social media accounts or through your community groups.

Please let me know if you have any questions.



Comment Form

**City of Pacifica Sea Level Rise
Public Meeting
Thursday, May 10, 2018**

Name: Lindsey Bales

Organization: CNG

Email Address: _____

- What economic analysis methodologies, if any, need more explanation?

- What comments or questions do you have about the economic analysis methodologies?

1 Since public property will be valued less than private property, does that mean strategies protecting private property will be more prioritized?

How will we ensure strategies are fairly distributed amongst public/private property?

[over]



General Comments

How will we fairly distribute strategies along the coast of Pacifica?

If your planning on creating prioritizations, how will we ~~ensure~~ ensure we don't leave under-represented members of the community out? ^{based on economic value}

1 (Cont.)

I hope we can find a balanced amount of strategies that are fairly distributed along the coast. Is property value the fairest way to determine what strategies will be chosen? Or can we look at the amount of people that will be affected if we continue with the status quo? For instance, a beach may be of lesser economic value than private property, but many more people will be affected by a loss of beach than a loss of private property.

Forms can be returned to staff tonight, emailed to sealevelrise@ci.pacifica.ca.us, or mailed to Bonny O'Connor, Assistant Planner at 170 Santa Maria Avenue, Pacifica, CA 94044. Comments will be accepted until May 17, 2018.

Thank you for your input!



Comment Form

**City of Pacifica Sea Level Rise
Public Meeting
Thursday, May 10, 2018**

Name: Eileen O'Reilly

Organization: CWG

Email Address: emkoreilly@gmail.com

- What economic analysis methodologies, if any, need more explanation?

1

1) PROPERTY VALUATION - THE PACIFICA HOUSING MARKET IS INSANE - AS FAR AS INTEREST IN BUYING PROPERTIES HERE AND THE PRICES. AS A REAL ESTATE PROFESSIONAL, I WOULD LIKE TO SEE THE CALCULATIVE METHODOLOGY TO ALLOW FOR THE INCREASE IN VALUE DUE TO HIGH DEMAND AND LOW SUPPLY WITH REGARDS TO PROPERTY VALUATION PER PARCEL.

2

2) THERE IS NO MENTION OF LOSS OF VALUE ONCE THESE INUNDATION ZONES ARE MADE PUBLIC. LOSS OF INSURANCE, MORTGAGE LENDING IS THIS BEING CONSIDERED?

- What comments or questions do you have about the economic analysis methodologies?

3

WE HAVE BEEN HEARING ABOUT POSSIBLY FLOATING A BOND OUT THERE IF OUR PROPERTIES ARE DEVALUED DUE TO THE INUNDATION ZONES & etc HOW WILL WE BE CREDIT WORTHY OR RISK DEFERRED?

[over]



Comment Form

**City of Pacifica Sea Level Rise
Public Meeting
Thursday, May 10, 2018**

Name: MAUREEN GARCIA

Organization: CWG

Email Address: MS. MO. GARCIA @ GMAIL.COM

- What economic analysis methodologies, if any, need more explanation?

1

PLEASE CONFIRM THAT DIFFERENT ADAPTATION STRATEGIES WILL BE ANALYZED IN DIFFERENT AREAS (GEOGRAPHIC) IN PACIFICA AT VARIOUS TIMEFRAMES (SO WE CAN SEE THE VARIOUS OPTIONS IN THE DIFFERENT PARTS OF PACIFICA).

2

- PLEASE WORK ON A SOLUTION TO ESTIMATING PG&E COSTS TO REPLACE.

- What comments or questions do you have about the economic analysis methodologies?

3

- NEEDS TO TAKE INTO ACCOUNT VALUE OF WETLANDS + ENDANGERED SPECIES PROTECTION.

4

- PLEASE INCLUDE "SUNFONOMIC" ANALYSIS

5

- PLEASE INCLUDE A RANGE OF ECONOMIC VALUE ADDED TO LOCAL BUSINESSES WHEN PEOPLE GO TO THE BEACH

6

= PLEASE INCLUDE STATEVIEW IN OPTIONS TO PROTECT.

7

- PLEASE INCLUDE NON-MARKET VALUE FOR THE GOLF COURSE, BEACHES, + ^[over] ENDANGERED SPECIES/WETLANDS.

I.E. SPENCER'S COMMENT W/ CITY OF SF VALUE.



General Comments

8

PLEASE DISTINGUISH BETWEEN COSTS TO
UPGRADE CERTAIN STRUCTURES (SUCH AS SEA
WALL AT BEACH BLVD) VS. THE COST TO
CONSTRUCT A WHOLE NEW STRUCTURE.

Forms can be returned to staff tonight, emailed to sealevelrise@ci.pacifica.ca.us, or mailed to Bonny O'Connor, Assistant Planner at 170 Santa Maria Avenue, Pacifica, CA 94044. Comments will be accepted until May 17, 2018.

Thank you for your input!

Natesan, Sanjana

From: Potter, Spencer (REC) <spencer.potter@sfgov.org>
Sent: Thursday, May 17, 2018 3:57 PM
To: O'Connor, Bonny
Cc: Wayne, Lisa (REC)
Subject: SFRPD comment on Pacifica LCP Economic Analysis Memorandum

Dear Ms. O'Connor,

Thank you for providing the opportunity to comment on ESA's May 4, 2018 Economic Analysis Memorandum for Pacifica's Sea Level Rise LCP update. Please find the San Francisco Recreation and Park Department's comment below.

1. Pacifica Should Include the Cost of Mitigating Potential Loss of Wetland and Endangered Species Habitat in the Local Coastal Plan's Economic Analysis.

As detailed in Pacifica's January 2018 Draft Sea Level Rise Vulnerability Assessment, Sharp Park's Laguna Salada wetlands complex and upland endangered species habitat areas (as well as the contiguous wetlands and habitat at Mori Point) are at risk from wave run-up, storm flooding, and coastal erosion under several of the coastal hazard exposure scenarios being evaluated in the LCP update (see pp. 18-19; Appendix D). The May 4, 2018 Memorandum states that its purpose is to provide "the best available information on the aggregate economic value of property and activities at-risk due to hazards associated with sea-level rise" and that this analysis will be used to "inform decision-makers and stakeholders about the economic considerations associated with various sea-level rise scenarios and adaptation options available..." (May 4 Memorandum, p. 2.).

1 However, as described in the May 4 Memorandum and confirmed by ESA during the May 10 Community Meeting's Q&A period, the cost of mitigating the potential loss of wetland and habitat areas is currently not included in the LCP's economic analysis. SFRPD respectfully urges the City of Pacifica to include in its economic analysis the anticipated cost of mitigating for the potential loss of the Laguna Salada and Mori Point wetlands and upland endangered species habitat so as to ensure that (1) ecological values are fairly considered in Pacifica's land use planning process, and (2) that the absence of an important class of assets listed in the January 2018 Vulnerability Assessment does not render the economic analysis incomplete to the point of being unreliable. The cost of mitigation should include the full costs of purchasing, engineering, and enhancing appropriate substitute habitat in consultation with expert biologists on the species, translocation of endangered species populations, etc., with the goal of achieving "no net loss" of wetlands or endangered species habitat. Guidance on valuing compensatory mitigation for the loss of wetlands and endangered species habitat is readily available for incorporation into this analysis, and during the May 10 Community Meeting's Q&A period ESA intimated that they have conducted this type of analysis for previous projects.

2. Pacifica Should Value the Sharp Park Golf Course in Terms of Market Valuation.

2 The May 4 Memorandum states that the economic value of the Sharp Park Golf Course "will be approximated in terms of fees generated per year" at the golf course. (May 4 Memorandum, p. 5.) However, this method of valuation does not take into account the important historical value of the golf course nor the fact that Sharp Park's green fees, like those of most public golf courses, are subsidized far below market rate. Moreover, the approach of using non-market valuation (valuing in terms of use/fees rather than the market value that would be paid for a similar property) for recreational assets, as described on pp. 4-5 of the May 4 Memorandum, devalues recreational property as compared with residential and commercial real estate (which is valued according to normal market valuation). SFRPD respectfully requests that Sharp Park Golf Course is valued in terms of market valuation (i.e., the going market rate for a coastal golf course of similar acreage with similar historical value), so that its true valuation is included in the analysis.

Thank you,
Spencer

Spencer Potter, J.D.
Natural Resources Regulatory Specialist

San Francisco Recreation and Parks Department
811 Stanyan Street | San Francisco, CA | 94117
(415) 242-6373 | spencer.potter@sfgov.org



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O'Connor, Bonny

From: amy [REDACTED] >
Sent: Friday, May 04, 2018 12:40 PM
To: Sea Level Rise
Subject: compare pacifica to the rest of the bay area. where will moneys be prioritized?
Attachments: bay area 6' inundation map.png

1 | compare pacifica to the rest of the bay area. where will national, state, county funding be prioritized?

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SEA LEVEL RISE VIEWER

94044, Pacifica, CA, USA



WATER LEVEL

6ft

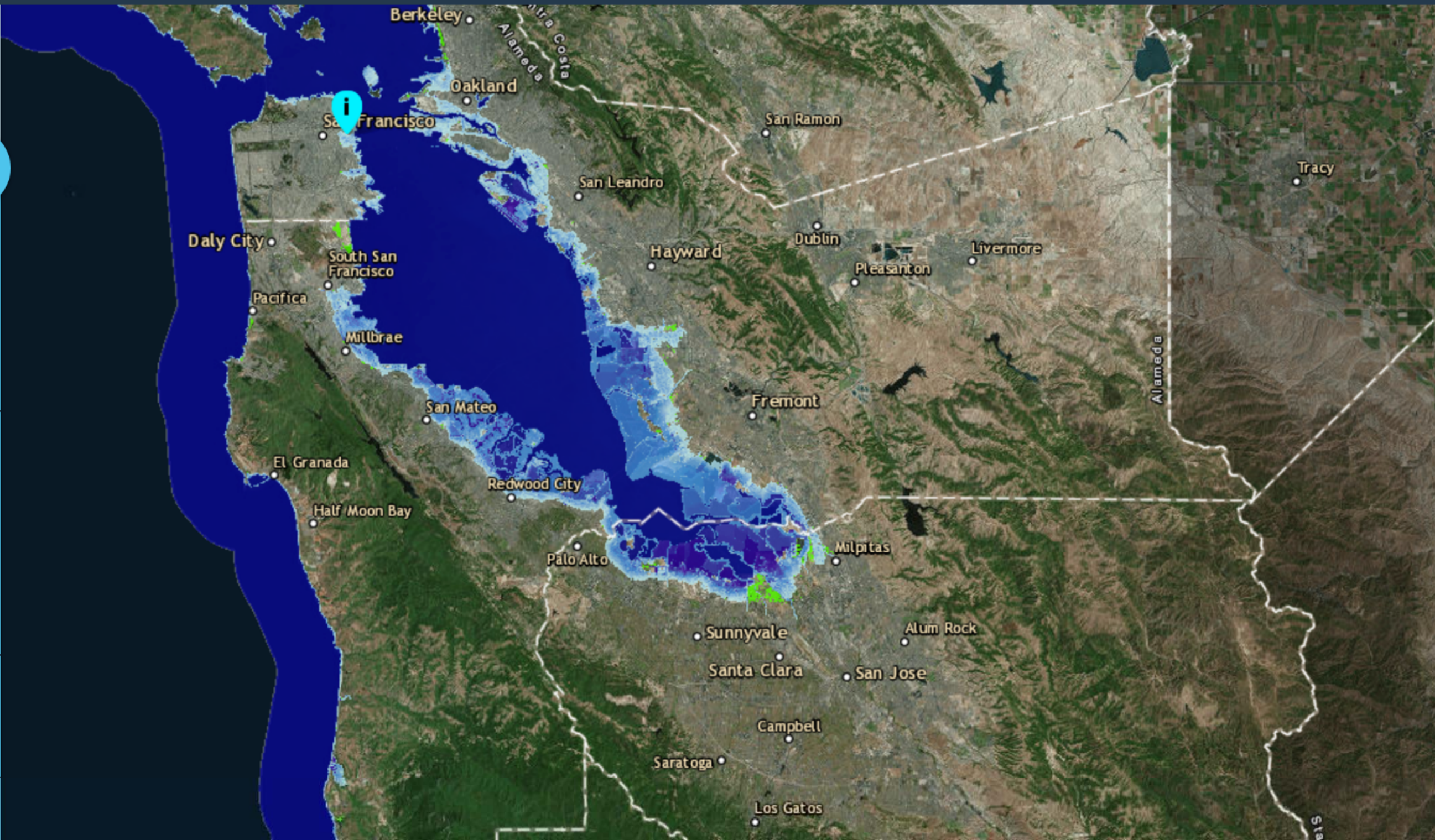
5ft

4ft

3ft

2ft

1ft



Natesan, Sanjana

From: Brad Wahrlich <[REDACTED]>
Sent: Thursday, May 17, 2018 1:43 PM
To: Sea Level Rise
Subject: Economic Analysis Comment

Dear City of Pacifica,

1 This email is being submitted as a comment on the Economic Analysis Methodology in relation to Pacifica's Sea Level Adaptation Plan. The Economic Analysis Methodology fails to consider the adverse economic impact of implementing the "retreat" adaptation measure. Specifically, the retreat adaptation measure will restrict development, construction, and significant improvement to properties and existing structures within hazard zones. If neighborhoods are not allowed to be improved with significant remodels and new homes, the property values will be impaired, causing harm to the property owners and adversely impacting tax revenue streams for Pacifica. Thank you for your consideration and I invite further dialogue to mitigate the adverse economic impact of this adaptation measure.

Sincerely,
Brad and Julie Wahrlich

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SAN FRANCISCO
PUBLIC GOLF ALLIANCE



██████████ Masonic Ave., San Francisco, CA 94117 • ██████████ 8 • ██████████ g

May 11, 2018

Pacifica City Planner Lisa Wehrmeister
Pacifica City Manager Kevin Woodhouse
170 Santa Maria Ave.
Pacifica, CA. 94044

Re: SF Public Golf Alliance’s preliminary comment on the SLR Economic Analysis Methodology Memo. The ESA memo lacks documentation for key points, and is confoundingly poorly documented. Accordingly, we request access to unavailable purportedly underlying data and authority, and request an extended comment deadline to enable reasonable time to review and comment on the underlying data.

Dear Ms. Wehrmeister and Mr. Woodhouse,

The May 4, 2018 memorandum submitted by Pacifica’s consultant ESA, entitled “Methodology for Economic Analysis of Sea Level Rise Hazards, etc.”¹ (the “Economic Methodology Memo”) makes key statements for which it does not provide legal support or backup data. We therefore request that the supporting documents be made public, and that SF Public Golf Alliance and others who may wish to provide comment, be provided an extension of time from the posted May 17 comment deadline, to enable informed comment.

1. California Coastal Commission (2015). At the second-to-the-last paragraph at Page 2, the Economic Methodology Memo states: “this study will follow California Coastal Commission guidance and apply a day use value of \$40—that is, a day at the beach is worth \$40.” For that proposition, the Memo cites, at footnote 4, “California Coastal Commission (2015)”. The same citation to a Coastal Commission document is also cited at footnotes 8 and 9 of the Memo. The References section of the Memo, at page 12, includes the following: “California Coastal Commission. 2015. Improved Valuation of Impacts to Recreation, Public Access, and Beach Ecology from Shoreline Armoring.” But there is no link to that report in the Memorandum or its References section. At the Community Work Group’s May 10 public meeting, I asked Dr. Phil King, who presented the Memo for ESA, for a copy or link to the Coastal Commission 2015 report. He said he thinks that report has not been made public by the Coastal Commission, and said he could not give it to me. We have made an internet search, including a search of the Coastal Commission’s website, but have been unable to find

¹ ESA, Memorandum, “Methodology for Economic Analysis of sea Level Rise Hazards for Pacifica Sea Level Rise LCP Update,” May 4, 2018: <http://www.cityofpacifica.org/civicax/filebank/blobdload.aspx?BlobID=14133>

1 (Cont.)

the purported 2015 Improved Valuation of Impacts report or study or whatever it is. Without a copy of the purported Coastal Commission report, both the \$40-per-day amount and the claim that this valuation is somehow required by the Coastal Commission (as claimed in the Memo) are unproven and incapable of being proven. So we ask for a copy – or at least a working URL link – to the purported Coastal Commission document entitled “Improved Valuation of Impacts to Recreation, Public Access, and Beach Ecology from Shoreline Armoring”, and a reference to any decision or mandate by the Coastal Commission that the \$40-per-day “rule” or any part of the “Improved Valuation” document is somehow to be imposed on the City of Pacifica.

2

2. Uncertain, and therefore misleading and/or useless References. The ESA Economic Methodology Memo has a total of 9 footnotes, which refer to a total of 6 different publications. None of these references contain page numbers where the purported information can be found in the referred documents. Yet there are a total of 35 purported “References” listed in the References section of the Economic Methodology Memo; of these 35, URL’s are provided for only two – RS Means, “Square Foot Costs,” and US Army Corps of Engineers, “Economic Guidance Memorandum”. So it is virtually impossible to substantiate anything that the Economic Methodology Memo says, based on the footnotes and the References section. To make the information accessible to the public, the Memo should (1) give page citations to its references; (2) tie-in all of the listed References to the footnotes; (3) provide URL’s and/or other ways to access the references; and (4) eliminate any authorities from the References section that are not tied to footnotes.

3

3. The Draft San Francisco Littoral Cell CRSMP Plan has never been finalized, and so should not be used as support for Pacifica’s LCP planning. At page 12 of the References section, the Economics Methodology Memo identifies as one of its source documents the following: Environmental Science Associates (ESA), 2016, San Francisco littoral Cell Coastal Regional Sediment Management Plan, Draft, prepared for the US Army Corps of Engineers and the Coastal Sediment Management Workgroup.” This is a draft plan, riddled with errors, that has been criticized by the City of Pacifica, City and County of San Francisco, and San Francisco Public Golf Alliance, among others. The Draft has never been finalized or adopted, and should not be the basis of the current Pacifica LCP study.

At your very earliest convenience, please provide to us and to the public a URL and/or copy of the purported Coastal Commission 2015 “Improved Valuation of Impacts” document described in No. 1, above, together with reference to any legal authority that the Coastal Commission somehow mandates its application by the City of Pacifica. We expect to make further comment when that information is made available.

Very truly yours,

San Francisco Public Golf Alliance

Richard Harris

Richard Harris, President

ccs: See page 3

ccs:

Pacifica City Council

Pacifica Public Works Department

Bonny O'Connor, Assistant Pacifica Planner

San Francisco Recreation and Park Department

Congresswoman Jackie Speier

State Senator Jerry Hill

Assemblyman Kevin Mullin

San Mateo County Board of Supervisors

California Coastal Commission, North-Central Coast District

San Mateo County Office of Sustainability

U.S. Army Corps of Engineers, Susan M. Ming, PE

Bo Links



June 8, 2018

Pacifica City Planner Lisa Wehrmeister
Pacifica City Manager Kevin Woodhouse
170 Santa Maria Ave.
Pacifica, CA. 94044

**The Economic Methodology Memo is unreliable:
(1) it misrepresents Coastal Commission beach recreation value policy;
(2) it lacks local data for beach attendance and economic impact; and
(3) overlooks valuation information at Sharp Park for endangered species
habitat, the golf course, and public coastal golf recreation.**

Dear Ms. Wehrmeister and Mr. Woodhouse,

San Francisco Public Golf Alliance, a non-profit, pro-bono public benefit organization, on behalf of its more-than-6,500 members, submits this supplement to our letter dated May 11, 2018,¹ in response to ESA's May 4, 2018 memorandum, "Methodology for Economic Analysis of Sea Level Rise Hazards for Pacifica Sea Level Rise LCP Update"² (the "Economic Methodology Memo").

I. The Economic Methodology Memo misrepresents the Coastal Commission's policy on beach recreation valuation, and contains no reference to competent local data to support any Pacifica beach recreation valuation or attendance figures.

At page 4, the Economic Methodology Memo describes "non-market valuation techniques" ESA proposes to measure the "recreational value of Pacifica's beaches." ESA says it will follow "California Coastal Commission guidance and apply a day use value of \$40 – that is a day at the beach is worth \$40," together with the "best-available attendance data" for the beaches. There are two huge problems here, as discussed in detail below: (1) the Coastal Commission has not, in fact, issued a "guidance" or otherwise directed or ordered that a "day at the beach" is to be valued at \$40 -- or any other set amount; and (2) the Economic Methodology Memo references no remotely reliable attendance data for Pacifica beaches other than Linda Mar, and no relevant economic impact data whatsoever for Pacifica beach recreation.

¹ Letter, May 11, 2018, San Francisco Public Golf Alliance to Pacifica Planning Department, et al: https://drive.google.com/open?id=1XuAdM9moOP4DMJEF5tmAEIBW9RvO_le

² ESA, Memorandum, "Methodology for Economic Analysis of sea Level Rise Hazards for Pacifica Sea Level Rise LCP Update," May 4, 2018: <http://www.cityofpacific.org/civixax/filebank/blobdload.aspx?BlobID=14133>

A. Contrary to what the Economic Methodology Memo says, the California Coastal Commission has not approved or adopted a statewide “day at the beach” recreational valuation figure.

To calculate the value of beach recreation, the Economic Methodologies Memo states that Pacifica’s consultant ESA will “... follow California Coastal Commission guidance and apply a day use value of \$40—that is, a day at the beach is worth \$40,”³ citing as authority a 2015 California Coastal Commission study entitled “Improved Valuation of Impacts to Recreation, Public Access and Beach Ecology from Shoreline Armoring.”⁴ (The “Improved Valuation of Impacts” report was not made available until May 24. See the e-mail chain at footnote 11, below.) The Economic Methodology Memo claims that “Economists have developed techniques to estimate how much consumers would be willing to pay for a day at the beach (willingness to pay or WTP). . . For most policy applications, economists use a “day use value” to estimate the WTP for an average consumer. In May 2017, the California Coastal Commission adopted a day use value for California’s beaches of \$40/day for beach visitation in Solana Beach.” But this is not true.

1 (Cont.) ESA’s economics consultant Dr. Phillip King elaborated this misrepresentation at the May 10, 2018 public meeting of the Pacifica SLR Community Workgroup, where he claimed: “We have standard metrics which tell us how much a day at the beach is worth. By the way, the Coastal Commission has said it’s worth \$40 a day to go to the beach. Now most of those studies are based on Southern California beaches, but they want us to apply that number for everywhere.”⁵ When he was asked “where does the Coastal Commission require you to use the \$40 per day recreational value for beach days,” Dr. King testified:

“I testified about a year ago to the Coastal Commission at Solana Beach. They were not happy about me, but I basically testified to the Coastal Commission that that [\$40] was a reasonable estimate. . . . the Coastal Commission would really like a fairly straightforward method to figure out how much a beach day is worth. . . . And we also decided, and in some way it’s more equitable, to have sort of a standard number across the state. So that’s sort of the short answer for why the Coastal Commission decided to do that.”⁶

To a follow-up question asking whether the “day-at-the-beach” value is the same for “a sunny beach as opposed to a rainy beach,” Dr. King answered: “Well, the Coastal Commission has decided that it should be the same.”⁷ Again, this is not true.

³ Economic Methodologies Memo, *id.*, at page 4, footnote 4. page 10, footnote 8, and at References, page 12 <http://www.cityofpacificacalifornia.org/civicax/filebank/blobdownload.aspx?BlobID=14133>

⁴ California Coastal Commission, Improved Valuation for Impacts to Recreation, Public Access, and Beach Ecology from Shoreline Armoring, Administrative Draft, dated September 28, 2015: <https://drive.google.com/open?id=1TpFmEXLdHr9EnzgcHQgA3CElX7zg-MT->. Neither the study nor an URL link to it was produced with the release of the May 4, 2018 Economic Methodologies Memo; but it was ultimately produced, on or about May 23, 2018. See the May 24, 2018 e-mail from Pacifica Planning Director Tina Wehrmeister, part of the Coastal Commission e-mail chain attached to footnote 10, below.

⁵ Pacifica SLR Community Work Group Public Meeting, May 10, 2018, at 0:25:18-0:25:50

<https://www.youtube.com/watch?reload=9&v=B23Ny1aXhzE&feature=youtu.be>

⁶ Pacifica SLR Community Work Group Public Meeting, May 10, 2018, at 1:07:42 – 1:09:10

<https://www.youtube.com/watch?reload=9&v=B23Ny1aXhzE&feature=youtu.be>

⁷ Pacifica SLR Community Work Group Public Meeting, May 10, 2018, at 1:10:18 – 1:10:46

<https://www.youtube.com/watch?reload=9&v=B23Ny1aXhzE&feature=youtu.be>

1 (Cont.)

In fact, the idea of a single statewide \$40 “day-at-the-beach” valuation figure was a proposal advocated jointly by Dr. King and the Surfrider Foundation’s then-Environmental Director Chad Nelson, who in 2013 were retained as economic consultants under an Interagency consulting contract between the Coastal Commission and San Francisco State University.⁸ (The hiring of Nelson, a key senior staffer on the payroll of the activist pro-managed retreat organization Surfrider Foundation, would appear to be a violation of California’s statutory and common-law conflict-of-interest laws.⁹) The King-Nelson proposal was roundly criticized by Commission Staff,¹⁰ and has never been adopted or approved by Commission Staff or by the California Coastal Commission itself.¹¹ In the final Draft version of the “Improved Valuation” study, dated September 26, 2015, Commission Staff’s criticisms included, among other things, that the proposed statewide \$40 “day-at-the-beach” recreational value appears designed to “produce a large recreational loss value” that far exceeds – by 3.5 to more than 10 times – values used by the Coastal Commission for similar projects, and that the proposal is based on studies of Southern and Central California beaches which appear not to be applicable to all beaches statewide.

“Due to [the] range of values and the sparseness of beach specific data for areas outside of southern and central California the academics recommend that the beach recreation valuation not be based on studies for an individual beach, but rather that a single consumer surplus value should be used for the entire state.

⁸ The “Improved Valuation of Impacts” study was commissioned in mid-2013 by the Coastal Commission in an interagency agreement with San Francisco State University, with the study period to run July 1, 2013-December 31, 2014. (Scope of Work, Addendum B to Improved Valuation for Impacts to Recreation, etc., *supra*, at pp B-7 and -8 [265-266 of 337] <https://drive.google.com/open?id=1TpFmEXLdHr9EnzgcHQgA3CELX7zg-MT->) The Scope of Work identifies Phil King and Chad Nelson as the consultants responsible to develop a beach recreation valuation methodology. Chad Nelson was added to the consulting team at Dr. King’s request. (“Dr. King requested and was given permission to augment the team’s economic valuation expertise by adding Dr. Chad Nelson as a non-academic sub-contractor, to the initial scope of work.” Improved Valuation for Impacts to Recreation, etc., *id.*, at page 11: <https://drive.google.com/open?id=1TpFmEXLdHr9EnzgcHQgA3CELX7zg-MT->) At the time he was hired as one of the CCC’s economic consultants, Chad Nelson’s resume shows that he was simultaneously serving as the Surfrider Foundation’s Environmental Director, for which he had worked since 1999, with duties including “organization-wide leadership on environmental programs, campaigns, issues and strategy”. (See Nelson’s Curriculum Vitae in Exhibits to Improved Valuation for Impacts, to Recreation, etc.: <https://documents.coastal.ca.gov/reports/2017/5/th17d/th17d-5-2017-exhibits.pdf>, Ex. 9, at pp. 55-56.) The Improved Valuation study notes, at page 1 footnote 1, that as of the study’s September 28, 2015 publication date, Nelson was Executive Director of the Surfrider Foundation – a position which he has held since on or about October 1, 2014, and continues to hold as of the date of this letter. See Surfrider Foundation website: <https://www.surfrider.org/coastal-blog/entry/meet-surfriders-new-ceo-chad-nelsen>

⁹ California Government Code Sections 1090 and 87100. *Davis vs. Fresno Unified School District et al* (5th Dist., 2015) 237 Cal.App.4th 261, 294-301 (consultants are subject to California governmental and common-law conflict-of-interest laws) <https://caselaw.findlaw.com/ca-court-of-appeal/1705228.html>

¹⁰ California Coastal Commission, Improved Valuation for Impacts to Recreation, Public Access, and Beach Ecology from Shoreline Armoring, Administrative Draft, dated September 28, 2015, carrying the following notation on its title page: “Administrative Draft – Not approved by the Coastal Commission.” <https://drive.google.com/open?id=1TpFmEXLdHr9EnzgcHQgA3CELX7zg-MT->

¹¹ E-mail, May 25, 2018 from Patrick Foster, Coastal Planner, North Central Coast District, California Coastal Commission, confirming that “the report was presented to the Coastal Commission in 2015 but was not approved as agency policy.” https://drive.google.com/open?id=1VVGwLEcqlUWYyFX5z67wvjvD0fRkQB_wh

The consumer surplus value that the academics recommend is \$39.49 per attendee per day (2015 dollars).”¹²

“The identified recreational valuation losses greatly exceed what the Commission has been using as mitigation for the loss of recreational beach area. Based on the case examples, the fees from the recreational value method are 3.5 to over 10 times more than the in-lieu fees that have been applied by the Commission for similar projects. ...”¹³








“The academics have recommended one consumer surplus value for state-wide use; however, in the future it could be possible and useful to establish more regionally appropriate criteria or amenities to develop regionally-specific or locally-specific day-use values. It may be possible to further refine the model for individual beaches by setting more representative amenity point values for the various amenities associated with different beaches. However, pursuing this option would first require development of a consistent approach for weighting beach amenities to ensure an objective process. Peer review of the recommendations could help identify the appropriate changes and modifications that might be most useful and most appropriate to development in the future. . . . It is clear from the case studies provided that the recreation valuation method will produce a large recreational loss value. . . .”¹⁴

Contrary to ESA’s and Dr. King’s claims, the California Coastal Commission in its May 11, 2017 public hearing on the City of Solana Beach LCP Amendment (Public Recreation Fee) matter, in fact did not adopt a single statewide “day-at-the-beach” recreation value – of \$40 or any other amount. Rather, by unanimous consent¹⁵ the Commission adopted an LCP certification order that rejected the single statewide fee approach, and instead approved an amended Solana Beach-specific recreation fee, with different amounts for winter and summer months, and based upon beach attendance, travel cost, and other data specific to Solana Beach.^{16, 17}

¹² California Coastal Commission, Improved Valuation for Impacts to Recreation, etc., *supra*, at page 36: <https://drive.google.com/open?id=1TpFmEXLdHr9EnzgcHQgA3CELX7zg-MT->.

¹³ California Coastal Commission, Improved Valuation for Impacts to Recreation, etc., *supra*, at page 46: <https://drive.google.com/open?id=1TpFmEXLdHr9EnzgcHQgA3CELX7zg-MT->.

¹⁴ California Coastal Commission, Improved Valuation for Impacts to Recreation, etc., *supra*, at page 54: <https://drive.google.com/open?id=1TpFmEXLdHr9EnzgcHQgA3CELX7zg-MT->.

¹⁵ California Coastal Commission Public Meeting, May 11, 2017, <http://cal-span.org/unipage/?site=cal-span&owner=CCC&date=2017-05-11>, Agenda Item. 17d,  City of Solana Beach LCP Amendment, etc.,’ see, in particular,  Motion and  Vote Amending  Motion and  Vote  Motion and  Vote.

¹⁶ Coastal Commission Staff Report, Apr. 28, 2017, City of Solana Beach LCP Amendment, etc Staff Report, Apr. 28, 2017, Findings, pp. 14, 16-17: <https://documents.coastal.ca.gov/reports/2017/5/th17d/th17d-5-2017-report.pdf>

¹⁷ Letter, Coastal Commission, San Diego Area, to Solana Beach City Manager Greg Wade, May 24, 2017, formally notifying the city of the Commission’s certification order: <https://drive.google.com/open?id=15VL7KILxfimGvABvjM-hVjJQHbO5Rj-5>

1 (Cont.)

B. Pacifica beach attendance and economic impact data are missing from the Economic Methodology Memo.

Under the subhead “Beach Recreation,” the Economic Methodology Memo¹⁸ states, at page 4, that ESA will use “the best available attendance data”. But except for Pacifica State Beach (Linda Mar), ESA cites no remotely reliable beach attendance data sources for Sharp Park and Pacifica’s other beaches. The Memo’s References section (found at pages 10-14), contains citations to only four sources that appear to be potential Pacifica beach attendance and/or economic impact data sources.¹⁹ But none of these contain competent Pacifica source data.

The 2015 San Mateo County Coastal Access Study (identified at References, page 14) “. . . considers access to public lands along the San Mateo County coast between Pedro Point Headlands and El Granada,”²⁰ and contains no Pacifica beach attendance or economic impact data.

The ESA-authored Draft Coastal Regional Sediment Master Plan for the San Francisco Littoral Cell, January, 2016 (“Draft CRSMP”) was the subject of extensive unanswered critical comments from the City of Pacifica, City and County of San Francisco, and the San Francisco Public Golf Alliance, and has never been finalized.²¹ The Draft CRSMP candidly admits the unreliability -- which it euphemistically calls “a high error band” -- of its Pacifica beach attendance estimates,²² which it says are based on only four days of student assistant counting in February, 2014:

“Because few socioeconomic studies exist in this region, attendance estimates are based on actual counts at the beaches. . . . Because even fewer data were available for other beaches [other than San Francisco’s Ocean Beach], San

¹⁸ “Methodology for Economic Analysis of Sea Level Rise Hazards for Pacifica Sea Level Rise LCP Update,” *supra*, at page 10ff: <http://www.cityofpacific.org/civicax/filebank/blobload.aspx?BlobID=14133>

¹⁹ These sources are: (1) Environmental Science Associates (ESA), 2016, San Francisco Littoral Cell Coastal Regional Sediment Management Plan, for US Army Corps of Engineers and Coastal Sediment Management Workgroup, http://www.sfestuary.org/wp-content/uploads/2015/11/Draft_SFLC_CRSMP_20160104.pdf; (2) King, Philip, and Symes, D. (2004) “Potential Loss in GNP and GSP from a Failure to Maintain California’s Beaches”, Shore and Beach, Fall, 2004, https://drive.google.com/open?id=1MIC2QvIA7if_2XsDjGZQF5TLjnvxRhUy; (3) King, P.G. 2014 “data collected at beaches in San Francisco, Daly City, Pacifica and Inner San Francisco Bay for Coastal Regional Sediment Master Plans” (no URL available); and (4) San Mateo County, 2015, “San Mateo County Coastsides Access Study” <https://www.nps.gov/goga/learn/management/upload/SM-Coastsides-Access-FINAL-April-2015.pdf> .

²⁰ Nelson/Nygaard Consulting Associates, Inc., “San Mateo County Coastsides Access Study” (April, 2015), Introduction, page 1, and see the study area map at Figure 1-1: <https://www.nps.gov/goga/learn/management/upload/SM-Coastsides-Access-FINAL-April-2015.pdf>).

²¹ See Letter, September 18, 2017, San Francisco Public Golf Alliance to City of Pacifica Planning Department, ESA, et al: <https://drive.google.com/file/d/1YVSFSsxhEOwCnH915qyYJSXRWmyFFoCZ/view?usp=sharing>, incorporated by this reference.

²² The Draft CRSMP, at page 37, Table 6, estimates Pacifica’s annual beach attendance as follows: Manor District 8,000; Beach Blvd 40,000; Sharp Park 50,000; Hidden Cove 10,000; Rockaway Cove 40,000; Linda Mar 80,000; Shelter Cove 25,000. Draft CRSMP, *supra*, page 37, Table 6: http://www.sfestuary.org/wp-content/uploads/2015/11/Draft_SFLC_CRSMP_20160104.pdf

Francisco State University research assistants counted people at each of the other beaches four times in February.^[23] Counts were made on both weekdays and weekends and during various types of weather. . . **the estimates made from these counts have a high error band.**²⁴ (emphasis added)

Moreover, the Draft CRSMP admits that its Pacifica beach economic impact data is not taken from a Pacifica study, but rather from “spending per visitor per day from King and Symes (2004)²⁵ . . . collected at southern California beaches where the spending patterns may be different.”^{26 27}

2 (Cont.) The Draft CRSMP’s admitted reliance on the 2004 King and Symes study is completely misplaced. **Because the climate, water temperature, surf conditions, and visitor demographics are so different between these elite Southern California playa and Northern California beaches, King and Symes expressly states that its economic conclusions cannot reliably be applied to Northern California beaches.** Co-authored by the same Dr. Philip King who authored both the instant Economic Methodology Memo and the economic analysis portions of the Draft CRSMP – King and Symes was based on elite Southern California tourist beaches, “not chosen to be representative of all of California’s beaches, but rather were selected because of their attendance, national significance, and high rate of out-of-state and foreign attendance.”²⁸

We also decided to exclude beaches in northern California which are not suitable for swimming and thus do not attract the type of vacationers and day-trippers that beaches to the south do. We believe visitors to San Francisco’s beaches and beaches in Marin County and farther north are much less likely to go abroad if beaches ceased to exist.²⁹

²³ These four February student beach-count days appear to be what is referred to in the Economics Methodology Memo’s Reference section as “King, P.G. 2014 data collected at beaches in San Francisco, Daly City, Pacifica and Inner San Francisco Bay for Coastal Regional Sediment Master Plans.” Economic Methodology Memo, supra, at page 13
<http://www.cityofpacificacounty.gov/civicax/filebank/blobload.aspx?BlobID=14133>

²⁴ ESA, San Francisco Littoral Cell Coastal Regional Sediment Management Plan, Draft, supra, at p. 34:
http://www.sfestuary.org/wp-content/uploads/2015/11/Draft_SFLC_CRSMP_20160104.pdf

²⁵ King, Philip, and Symes, D., “Potential Loss in GNP and GSP from a failure to Maintain California’s Beaches,” Shore and Beach, Fall, 2004 (“King and Symes”):
https://drive.google.com/open?id=1MIC2QvIA7if_2XsDjGZQF5TLjnvxRhUy

²⁶ Economic Methodology Memo, supra, page 35:
<http://www.cityofpacificacounty.gov/civicax/filebank/blobload.aspx?BlobID=14133>

²⁷ The Draft CRSMP, at page 37, Table 6, charts Total Annual Spending figures for Pacifica beaches as follows: Manor District \$485,000; Beach Blvd. \$2,425,000; Sharp Park \$3,032,000; Hidden Cove \$606,000; Rockaway Cove \$2,425,000; Linda Mar \$4,851,000; and Shelter Cove \$1,516,000. Draft CRSMP, supra, page 37, Table 6:
http://www.sfestuary.org/wp-content/uploads/2015/11/Draft_SFLC_CRSMP_20160104.pdf

²⁸ King and Symes, supra, at page 8: https://drive.google.com/open?id=1MIC2QvIA7if_2XsDjGZQF5TLjnvxRhUy
The King and Symes beaches included Huntington Beach, Venice Beach, Del Mar-Solana Beach, Santa Barbara, and other high-toned Southern California playa, shown at page 8, Table 1a.

²⁹ King and Symes, id., at page 29: https://drive.google.com/open?id=1MIC2QvIA7if_2XsDjGZQF5TLjnvxRhUy

2 (Cont.)

. . . beaches on the north coast, in particular those in or north of San Francisco are qualitatively different from beaches on the Central and Southern California Coast. In particular the water is generally too cold to swim, and many Northern California beaches are subject to dangerous currents that make swimming impossible. While tourism still plays a significant role at many of these beaches, and surfing is especially popular at a number of Northern California beaches, **we decided to exclude these [Northern California] beaches from our estimates since we cannot conclude with confidence that visitor behavior at these beaches will be similar to Southern and Central California beaches.**³⁰ (emphasis added)

As discussed above, California Coastal Commission staff raised this same objection – of the inapplicability of Southern California beach data to Northern California beaches – to the King-Nelson attempt in the “Improved Valuation of Impacts” study to sell a blanket statewide \$40 day-at-the-beach value.

Accordingly, the \$40 “day at the beach” value, the “high error-band” beach attendance numbers, and the borrowed King and Symes beach economic impact data (which the King and Symes report itself says are untrustworthy for Northern California beaches) are all unreliable and unusable in Pacifica’s current Sea Level Rise and LCP update process.

C. The sand beach west of the Sharp Park levee is dangerous and lightly used: “few people set foot on the beach”.

3

Due to sneaker waves and a powerful undertow, Sharp Park Beach west of the golf course has been the scene of many drownings of beachwalkers over the years³¹, including at least three in 2016 -- in February³², August³³, and December.³⁴ At the entrance to the beach from Clarendon Road near the northwest corner of the golf course, the beach is posted

³⁰ King and Symes, *id.*, at page 21: https://drive.google.com/open?id=1MIC2QvIA7if_2XsDjGZQF5TLjnvxRhUy

³¹ San Jose Mercury News, March 3, 2010, “Dangerous Surf at Pacifica Beach Claims another victim . . .”: the news report describes three drowning deaths at Sharp Park Beach in February, 2010, and quotes one local resident calling Sharp Park Beach “the people-eater”:
<http://www.mercurynews.com/2010/03/30/dangerous-surf-at-pacifica-beach-claims-another-victim-officials-to-put-up-new-signs/>

³² KGO TV News, Feb. 9, 2016, “Pacifica Man Dies Trying to Save Wife Swept Out by Big Waves”:
<http://abc7news.com/news/pacifica-man-drowns-trying-to-save-wife-swept-out-by-big-waves/1193987/>
(reporting that Pacifica resident Larry Moore and his wife were walking on the Sharp Park beach when his wife h when she was caught by a sneaker wave and dragged into the ocean; Moore drowned walking on the beach, was caught and dragged into the ocean by a “sneaker wave”; although the wife was rescued by another person, Larry Moore drowned in an effort to rescue her).

³³ Bay City News, Aug. 15, 2016, “Dead Body Found in Water at Sharp Park Beach”:
<https://sfbay.ca/2016/08/15/dead-body-found-in-water-at-sharp-park-beach/>

³⁴ San Francisco Chronicle, Dec. 6, 2016, “Dead Man Washes up on Pacifica Beach”:
<http://www.sfgate.com/bayarea/article/Dead-man-washes-up-on-Pacifica-beach-10778519.php>

with at least two danger signs³⁵, and the City of Pacifica's webpage for the beach describes it as dangerous and warns against swimming.³⁶

3 (Cont.)

Accordingly, the Draft CRSMP³⁷ and its Economics Analysis both note that few visitors at Sharp Park Beach set foot on the sand beach, because it is so dangerous. "The pier at Sharp Park is extremely popular with fishermen throughout the year and the adjacent path (which follows the coast and goes next to the golf course) is also popular. **Few people set foot on the beach and the waves are posted as dangerous.**"³⁸

D. There is no evidence of beach loss at Sharp Park Beach west of the golf course, where surf conditions, the beach's northwesterly orientation, and its location adjacent to Mori Point, keep the sand from migrating away.

4

Sharp Park Beach west of the golf course levee has not been eroding since the levee was erected in the late 1980's. The facts are detailed in our February 19, 2016 letter to the Coastal Sediment Management Workgroup, incorporated herein by this reference.³⁹ This was confirmed by Bob Battalio, project manager of ESA's Pacifica sea level rise study, who explained to an April 26, 2018 public meeting of Pacifica's SLR Community Work Group that Sharp Park Beach remains wide and stable, despite the presence of the levee, because the beach's northwesterly orientation faces directly into the predominant direction of the waves, and Mori Point, which adjoins the beach immediately to the south, acts as a "big jetty or groin, . . . inhibiting the sand transport from driving the sand further south, and so the sand kind of piles up" at Sharp Park beach.⁴⁰

³⁵ Photographs, taken November 2, 2017 at the sea wall at the west end of Clarendon Road, Pacifica, showing "Danger" signs at the beach and the northwest corner of the golf course fence
<https://drive.google.com/file/d/1bPwAisD0O5g7Gk8YEAKje7llvpwDbamQ/view?usp=sharing>

³⁶ The City of Pacifica's Sharp Park Beach webpage warns: ". . . this beach is famous for its treacherous riptides.":
http://www.cityofpacific.org/depts/rec_department/parksbeaches/beach_and_park_info_and_rules/sharpbeach.asp

³⁷ ESA, Draft CRSMP, *supra*, at pages 2 and 7:
http://www.sfestuary.org/wp-content/uploads/2015/11/Draft_SFLC_CRSMP_20160104.pdf

³⁸ Appendix F, Economics Analysis [to the CRSMP], March, 2014 (authored by Dr. Philip King), at page F-7:
http://www.sfestuary.org/wp-content/uploads/2015/11/SFLC_CRSMP_Appendices_Jan2016.pdf

³⁹ Letter, Feb. 19, 2016, from San Francisco Public Golf Alliance to Coastal Sediment Management Workgroup, Susan M. Ming, Project Manager:
<https://drive.google.com/file/d/0B1h0x8Eg99deOUU1NmX0M2txa2M/view?usp=sharing>

⁴⁰ Video of the April 26, 2018 public meeting of the Pacifica Sea Level Rise Community Work Group, <https://www.youtube.com/watch?v=hh4iFYrVun4&feature=youtu.be>, at 1:02:50 through 1:04:30. Mr. Battalio was responding to a question from a Community Work Group member, asking for an explanation of how a wide beach persists at Sharp Park, long after the existing levee was built in the 1980's.

II. Valuations of the Sensitive Coastal Resources at Sharp Park Golf Course – the endangered species and their habitat, and of the golf course and public coastal golf recreation.

With its reasonably-priced public coastal golf recreation, historic golf architecture, and freshwater wetlands that provide habitat for endangered species, Sharp Park Golf Course is “Sensitive Coastal Resource Property” under the Coastal Act.⁴¹ On April 16, 2015 the California Coastal Commission granted to the City and County of San Francisco, the golf course’s owner, a permit to partially dredge and pump the lagoon.⁴² And on November 8, 2017 the Commission granted to San Francisco a permit to build, maintain and repair the levee that protects the golf course, the golfers, the endangered species and their wetlands habitat, and the surrounding residential neighborhoods from the ocean.⁴³ In both cases, the Commission ruled that the Sharp Park levee and approximately one-third of the Sharp Park property west of the Coast Highway, lie within the Commission’s own retained permitting jurisdiction, and in both cases the Commission considered and rejected managed retreat demands from the Surfrider Foundation.⁴⁴

So the California Coastal Commission has clearly determined Sharp Park’s Sensitive Coastal golf and wetlands resources to be highly valuable and worth protecting. These high values must not be overlooked or undervalued. Our following comments are in addition to our preliminary comments on asset valuations at pages 2-4 of our May 3, 2018 letter to Pacifica City Planner Lisa Wehrmeister, et al, incorporated by this reference.⁴⁵

⁴¹ California Resources Code Section 30116 (b), (c), and (f). “Sharp Park Golf Course qualifies as **sensitive coastal resource area** due to its significant recreational value and because it is a highly scenic area. . . . In particular, Sharp Park Golf Course is open to the public. It is a highly popular course enjoyed by golfers who appreciate its historic architecture, dramatic views, and inexpensive rates.” (emphasis added) California Coastal Commission, CDP Permit 2-12-014 (Sharp Park Pump House), Commission Staff Report, April 3, 2015, pages 18-19: <http://documents.coastal.ca.gov/reports/2015/4/th8a-4-2015.pdf>

⁴² California Coastal Commission, CDP Permit 2-12-014, Jn. 2, 2015 (Sharp Park Pump House): <https://drive.google.com/open?id=0B1h0x8Eg99dea0R1Tzc5VVZSVEU>; Commission Staff Report, April 3 and Addendum, April 15, 2015 <http://documents.coastal.ca.gov/reports/2015/4/th8a-4-2015.pdf>; April 3 Staff Report, page 5 (adopting Staff Report findings); page 12 and Exhibit 5 (retained permitting jurisdiction and jurisdiction map, <https://drive.google.com/file/d/0B1h0x8Eg99decW4wZzN0aFQtTDA/view?usp=sharing>); and April 15 Addendum, page 6 (rejecting Surfrider Foundation demand for managed retreat condition).

⁴³ California Coastal Commission, Coastal Development Permit No. 2-17-0702, dated Dec. 13, 2017: <https://drive.google.com/file/d/1p0QqR5MfVzoEayj2e7zPXHBEpDKtBhTw/view?usp=sharing>; Commission, Staff Report, Oct. 27, 2017, Application 2-17-0702, San Francisco Recreation and Parks Department, Pacifica, Nov. 8, 2017 meeting, Item No. 9a, <https://www.coastal.ca.gov/meetings/agenda/#/2017/11> : Oct. 27 Staff Report, page 4 (adopting Staff Report findings); page 16 (retained permitting jurisdiction); and pages 21-22 (rejecting managed retreat, finding it to be infeasible: “The ‘managed retreat alternative’ would, like the ‘no project’ alternative, result in removal of the berm in its entirety and would eventually return the area currently occupied by the berm footprint to its natural topography. . . . this alternative is currently infeasible because it would be extremely costly (estimated in the tens of millions of dollars) and it is unclear if a golf course could even be relocated inland at this location. In addition, it is infeasible due to the mandates the Applicant is under to protect existing habitat for the CRLD and the SFGS. . . . Therefore, the non-armoring solutions in this case are not currently feasible alternatives at this time.”

⁴⁴ See descriptions of Commission’s findings in the April 2015 and November 2017 cases at notes 42, 43, above.

⁴⁵ Letter, San Francisco Public Golf Alliance to Pacifica City Planner Lisa Wehrmeister, et al, May 3, 2018: <https://drive.google.com/open?id=1LZ3hornR93lyptgeCiiUL1pOJpCH1kWa>

A. Economic Valuation of the Golf Course: at least \$37 Million

The Sharp Park Golf Course consists of both public land – with approximately 100 of its total 120 acres located west of the Coast Highway, and structures – both the historic clubhouse and the golf holes themselves are “structures” within the meaning of the Coastal Act.⁴⁶ So there are two components of its valuation: (1) the value of the underlying public land, and (2) the replacement cost value of the golf course. As to the replacement cost value of the golf course, a good comparable can be found nearby at the City of Palo’s newly-reconstructed municipal golf course, now known as Baylands Golf Links, which officially reopened in May, 2018 following a two-year, \$12 Million renovation.^{47, 48} Baylands is located east of the Bayshore Freeway near the Palo Alto Airport, alongside the Palo Alto environmentally-sensitive marshlands near the mouth of San Francisquito Creek.

To this \$12 Million reconstruction cost should be added the sum of \$25 Million, being a conservative estimate of the value of one-half the golf course acreage west of the Coast Highway, based on the \$10 per square foot (in 2010 dollars) value estimate for public lands in the Sharp Park Golf Course/Mori Point neighborhood, as reported in Dr. King’s 2014 Economic Analysis Addendum to the Draft CRSMP.⁴⁹ That \$10 per square foot translates to \$435,600 per acre in 2010 dollars, or about \$25 Million in 2018 dollars.

B. Mitigation-based valuation of the endangered species and freshwater wetland habitat at Sharp Park.

At the May 10, 2018 public testimony to the Pacifica Sea Level Rise Community Workgroup, ESA’s project director Bob Battalio and economist Phil King said they thought dollar-valuing the wetlands was not within the scope of ESA’s consulting contract for Pacifica’s sea level rise adaption study.⁵⁰

But that’s not how it looks in the applicable contract documents between the City of Pacifica and ESA. Pacifica’s June 28, 2017 Request for Proposals for the instant Sea Level Rise study provides that the study will include an economic cost-benefit analysis of both the built and natural assets (such as wetlands) at risk in the different sea level rise adaption

⁴⁶ California Coastal Commission Staff Report, Oct. 27, 2017, San Francisco Recreation and Park Department (Sharp Park), App.No. 2-17-0702, Hearing Nov. 8, 2017, Item 9a, page 20 (“Sharp Park Golf Course is an ‘existing structure’ . . .”) <https://www.coastal.ca.gov/meetings/agenda/#/2017/11> ; and see California Resources Code Section 30610(G)(2)(c), defining “structure” to include landscaping.

⁴⁷ NBC News Bay Area, May 24, 2018, “Baylands Golf Links Opens in Palo Alto,” <https://www.nbcbayarea.com/news/local/Baylands-Golf-Links-Opens-in-Palo-Alto-483658241.html>

⁴⁸ Golf Advisor, Mar. 8, 2018, “An Early Look at the New Baylands Golf Links in Palo Alto, California”: <https://www.golfadvisor.com/articles/sneak-peek-baylands-golf-links-17686.htm>

⁴⁹ Draft CRSMP Appendix F, Economics Analysis, *supra*, at page F-10 (end of initial paragraph): http://www.sfestuary.org/wp-content/uploads/2015/11/SFLC_CRSMP_Appendices_Jan2016.pdf

⁵⁰ Pacific Coast TV, Pacifica Sea Level Rise Community Work Group meeting, May 10, 2018, at 2:06:40-2:09:02 (Battalio), and 2:09:08 (King) <https://www.youtube.com/watch?reload=9&v=B23Ny1aXhzE&feature=youtu.be>

strategies.⁵¹ ESA's Revised Asset Inventory for Pacifica LCP Update, dated January 9, 2018, is consistent, identifying "the **critical natural and built assets** that will be **included in the sea-level rise vulnerability assessment and valued.**" (emphasis added)

At the May 10, 2018 Community Workgroup public meeting, San Francisco Recreation and Park Department representative Spencer Potter said: "There does seem to be a way to value endangered species habitat. This is done through the process of compensatory mitigation. . . and also substitute endangered species habitat."⁵² ESA's Mr. Battalio agreed: "There are ways to estimate the values, especially for wetlands, because we have a no-net-loss policy for wetlands, and people are required to mitigate and we have done that and know how much it costs."⁵³

5 (Cont.)

At Sharp Park, the mitigation cost for potential loss of the endangered San Francisco garter snake and California red-legged frog and their freshwater habitat in the Laguna Salada wetlands, might be measured by a 2011 report entitled "Conceptual Ecosystem Restoration Plan and Feasibility Assessment for Laguna Salada, Pacifica, California," co-authored by ESA, with Bob Bottalio as Project Director.⁵⁴ That Conceptual Ecosystem Plan proposed a managed retreat strategy at Sharp Park – to let the levee erode the golf course flood, and move the endangered species habitat to the east -- that has been rejected by San Francisco, the US Fish & Wildlife Service, Army Corps of Engineers, and twice – in 2015 and 2017 – by the California Coastal Commission.⁵⁵ In its November 8, 2017 Order granting a Coastal Development Permit to San Francisco for the Sharp Park levee, the California Coastal Commission determined that managed retreat at the golf course levee

“. . . is currently infeasible because it would be extremely costly (estimated in the tens of millions of dollars) and it is unclear if a golf course could even be relocated inland at this location. In addition, it is infeasible due to the mandates the Applicant is under to protect existing habitat for the CRLF [California red-legged frog] and the SFGS [San Francisco garter snake]⁵⁶

⁵¹ City of Pacifica Request for Proposals, Professional Consultant Services, Draft Local Coastal Plan Update, June 28, 2017, at pages 4-5: "3. Adaption Plan Development. . . This evaluation will include an in-depth assessment of the costs and benefits of implementing each strategy including costs and benefit related to recreational and ecological values of beaches and other coastal resources, along with consideration of community input." Pacifica City Council Meeting, Aug. 14, 2017, Agenda Packet, at pocket pages 186-187: <http://pacificacityca.igm2.com/Citizens/FileOpen.aspx?Type=1&ID=1156&Inline=True>

⁵² Spencer Potter, San Francisco Recreation and Park Department, question: Pacific Coast TV, Pacifica Sea Level Rise Community Work Group meeting, May 10, 2018, at 2:05:25) <https://www.youtube.com/watch?reload=9&v=B23Ny1aXhzE&feature=youtu.be>

⁵³ Pacifica Sea Level Rise Community Workgroup meeting, May 10, 2018, Battalio testimony, *supra*, at 2:16:40-2:09:02, Pacific Coast TV: <https://www.youtube.com/watch?reload=9&v=B23Ny1aXhzE&feature=youtu.be>

⁵⁴ ESA-PWA, Feb. 9, 2011: "Conceptual Ecosystem Restoration Plan and Feasibility Assessment for Laguna Salada, Pacifica, California, <https://drive.google.com/open?id=0B1h0x8Eg99deWm9iVmNyV0hoUTA> The report was written for ESA's client, Wild Equity Institute. Mr. Battalio is identified as Project Director at page 46.

⁵⁵ See footnotes 42 and 43, above.

⁵⁶ Commission, Staff Report, Oct. 27, 2017, Application 2-17-0702, San Francisco Recreation and Parks Department, Pacifica, Nov. 8, 2017 meeting, Item No. 9a, <https://www.coastal.ca.gov/meetings/agenda/#/2017/11>, Oct. 27 Staff Report, at pages 21-22.

5 (Cont.) An “essential concept” of ESA’s Conceptual Ecosystem managed retreat proposal is a nature bridge to open up new habitat and a migration corridor for the frog and snake to higher ground east of the Coast Highway -- “a viable HWY 1 underpass or overpass specific to SFGS (San Francisco garter snake) needs”.^{57, 58} ESA’s “Conceptual Ecosystem” study does not contain a cost estimate, but it does say that the nature bridge concept will necessitate “partnerships with Caltrans,” and it compares its big idea to San Francisco’s new \$1 Billion-plus Doyle Drive Reconstruction project.⁵⁹ ESA and Dr. King should be asking Caltrans for cost estimates of highway bridges and tunnels.

6 III. CONCLUSION AND SUGGESTION

Key misinformation and omissions call the Economic Methodology Memo, and its sources and drafters, into question; going forward, Pacifica must hold its consultants and their work to higher standards of transparency and veracity.

The Economic Methodology Memo is gravely flawed, unreliable on key points, with a hint of conflict-of-interest. Given this unreliability, a very high degree of transparency is required. But transparency is also lacking in the Economic Methodology Memo, as noted in our May 11, 2018 preliminary response letter.⁶⁰ Pacifica’s important and controversial sea level rise adaption planning issues require the highest degrees of veracity and transparency. For starters, we respectfully request that Pacifica require its consultants to support their’ factual allegations and estimates in writing, with citation to specific underlying factual and data

⁵⁷ ESA-PWA, 2011, supra, “Conceptual Ecosystem Restoration Plan,” etc., at page 37.

<https://drive.google.com/open?id=0B1h0x8Eg99deWm9iVmNyV0hoUTA>

The proposed Highway 1 wildlife-bridge project is discussed at several points in the ESA-PWA 2011 report, including: “The restoration vision developed herein includes . . . a viable HWY 1 underpass or overpass specific to SFGS needs. (Page 26) . . . Connective corridor for SFGS and CRLF can be demonstrated in the future by seeking restoration opportunities and partners (e.g., Caltrans) to design either a HWY 1 underpasses or overpasses to promote genetic flow among populations.” (Page 27) . . . HWY 1 east of Laguna Salada is a barrier to wildlife movement. Partnerships with Caltrans will need to be developed to secure a future SFGS corridor underpass or overpass of HWY 1 that provides protection, refuge, and safe passage for wildlife.” (Page 28) . . . Adopt and identify the areas adjacent to and including Sanchez Creek as a future viable SFGS corridor that provides the potential for safe passage, either under or over road and HWY 1. Work towards finding additional funds and partnering with Caltrans. . . modifications to HWY 1 could greatly enhance restoration by reconnecting the ecotone on either side of the roadway. Highway One forms a barrier to wildlife (and people) which is a stressor to the natural east-to-west orientation of the coastal ridges and valleys. Figure 9 shows a connection across HWY 1 for SFRPD lands. . . We recommend that these considerations be incorporated in the HWY 1 planning. . . One example of a multi-objective roadway renovation project is the Doyle Drive Reconstruction in San Francisco, which includes elevated and depressed sections which will allow ecological and pedestrian connections from uplands to the shore. (Pages 29-30). . . Therefore, additional work is recommended to: . . . Consider the adverse effects to SFGS resulting from Highway One, and consider elements to mitigate these adverse effects as part of future Highway modifications.” (Page 35)

⁵⁸ The proposed wildlife corridor is described by the report as an “essential concept to strive for” (Id., at page 26), and is illustrated at the report’s Figure 9, a copy of which appears in a September 24, 2015 press release issued by ESA’s client, Wild Equity Institute: <https://drive.google.com/open?id=0B1h0x8Eg99deZDFLS3F1M1hpMm8>

⁵⁹ See footnote 57, above, for quotations from the Conceptual Ecosystem Restoration Plan about the need for “partnerships with Caltrans” and the comparison to the Doyle Drive Reconstruction project.

⁶⁰ Letter, May 11, 2018, San Francisco Public Golf Alliance to Pacifica Planning Department, et al: https://drive.google.com/open?id=1XuAdM9moOP4DMIJEF5tmAEIBW9RvO_le

6 (Cont.)

sources, and that the source documents must be individually identified and hard copies and/or working URL's be made public with the consultants' reports. And finally, this information must be made publicly available to the Community Working Group and to the general public at least a month before public informational and decision-making meetings.

Respectfully submitted

San Francisco Public Golf Alliance

Richard Harris

Richard Harris, President

ccs:

Pacifica City Council

Pacifica Public Works Department

Bonny O'Connor, Assistant Pacifica Planner

San Francisco Recreation and Park Department

Congresswoman Jackie Speier

State Senator Jerry Hill

Assemblyman Kevin Mullin

San Mateo County Board of Supervisors

California Coastal Commission, North-Central Coast District

San Mateo County Office of Sustainability

U.S. Army Corps of Engineers, Susan M. Ming, PE

Bo Links



Comment Form

**City of Pacifica Sea Level Rise
Community Work Group Meeting
Thursday, May 31, 2018**

Name: Lindsey Bales

Organization: Community Work Group

Email Address: _____

- What comments or questions do you have about the suggested adaptation strategies for any of the sub-areas?

- Do you foresee an issues with the suggested adaptation strategies for any of the subareas? Please explain.

1

Have adaptation strategies for Pacifica State Beach seem to be more focused on armoring & letting erosion occur. However, my concern is that the beach will disappear if only armoring & erosion strategies are chosen. Pacifica state



General Comments

1 (Cont.)

Beach is one of the most popular
beaches in Pacifica ~~area~~ brings
numerous recreational activities
to this area. I hope beach nourishment
and other strategies that maintain the
beach are considered for this area.

Forms can be returned to staff tonight, emailed to sealevelrise@ci.pacifica.ca.us, or mailed to
Bonny O'Connor, Assistant Planner at 170 Santa Maria Avenue, Pacifica, CA 94044. Comments
will be accepted until June 7, 2018.

Thank you for your input!



Comment Form

**City of Pacifica Sea Level Rise
Community Work Group Meeting
Thursday, May 31, 2018**

Name: MAURLEON GARCIA

Organization: CWG

Email Address: ms.mo.garcia@gmail.com

- What comments or questions do you have about the suggested adaptation strategies for any of the sub-areas?

1 | - EXACT LOCATION OF STORM BASIN @ FAIRWAY
DR.

2 | - WOULD LIKE TO INCLUDE THAT UNDEVELOPED
SPACE BE INCLUDED IN ADAPTATION PLAN AS PLACES
TO DIVERT WATER, ETC.

3 | - SHOULD INCLUDE REPLACEMENT OF NORTH SHARP PARK
SEA WALL AS AN ALTERNATIVE

- Do you foresee an issues with the suggested adaptation strategies for any of the subareas? Please explain.

4 | - DISTINGUISH BETWEEN NORTH SHARP PARK +
SHARP PARK SOUTH OF PIER?

5 | SHOULD INCLUDE ARTIFICIAL REEFS WHERE APPROPRIATE
TO MAINTAIN ECONOMIC VALUE OF SUNFONOMKS



General Comments

6

- REQUEST REPRESENTATIVE FROM SF REC CENTER / GOLF COURSE COME TO SOME MEETINGS

7

- REQUEST INFO FROM COASTAL COMMISSION ON CURRENT BAY DREDGING SAND BE USED FOR NOURISHMENT

Forms can be returned to staff tonight, emailed to sealevelrise@ci.pacifica.ca.us, or mailed to Bonny O'Connor, Assistant Planner at 170 Santa Maria Avenue, Pacifica, CA 94044. Comments will be accepted until June 7, 2018.

Thank you for your input!

Natesan, Sanjana

From: Kathleen Moresco <[REDACTED]>
Sent: Thursday, June 07, 2018 11:39 PM
To: Sea Level Rise
Cc: mikeoneill@yahoo.com; Sue Vaterlaus
Subject: Meeting of May 31, 2018

I attended the May 31st meeting and have grave concerns about this process.

The Memo that was presented to the Group was emailed to them roughly 24 hours before the meeting allowing very little time for the members to review the material before the presentation.

Then I receive an email from City of Pacifica on June 6th stating that comments can be made until June 7th. Another 24 Hour turn around.

This is not acceptable. People need more time to read, digest and discuss the material!

From the very beginning of this process the citizens of Pacifica have been concerned that ESA had been hired with the specific goal of establishing Managed Retreat as the adaptation plan for our community. After attending these meetings and listening to the presentations, I fear this may be true.

The main presenter from ESA (James Jackson) appears to be very nervous and defensive. When asked, he is unable to answer questions and whenever he stumbles, the moderator jumps in, interrupts and stops the questions in order to move the meeting forward (to keep within the time constraints that they have established). Very frustrating!

It does not appear that James Jackson knows Pacifica very well or that he has actually walked our beaches.

He refers only to computer modeling and observations he has made while driving by!

In stating that the North section of Palmeto would probably be lost to erosion.... he did not know that this was the only access into Pacifica for the residents North of the Fish & Bowl.

The following is a partial list of the questions asked that he was unable to answer:

- Page 14, Fairmont West Sub-Area - Erosion created by storm run-off is a major issue, do you know how this will be addressed in the plan?
- Currently there is plastic tarping with sand bags suspended; is this more appropriate than the netting that was there previously?
- Page 16, Shoreline residents pay for their own protection. How is this addressed in the Plan, will they be supported by Pacifica or remain on their own?
- (Tina Wehmeister said they have had meetings with those residents) But did not say what was discussed.
- Page 19, Pacifica State Beach. Example of "beach nourishment". Was sand added to the beach when the parking lot was added?
- Page 19, How much has Linda mar Beach receded in the past 10 years? What is your base line?
- Page 19, Pacifica State Beach – Sub Area (Linda Mar)
- Flooding from San Pedro Creek and increased ground water threaten Linda Mar... Is the ground water being measured?
- Beaches are not being replenished by sediment from the bay... Can the Coastal Commission require the dredging material to be deposited along the Daly City and Pacifica beaches?

Page 21, Pedro Point and Shelter Cove. Jackson stated that there were no adaptations considered to provide any protection to the Shelter Cove community. (Abandon them?)

What are the thresholds for each of the adaptations?

How can a consultant write a plan when they cannot answer these questions?

My personal concern is what a designation of "managed retreat" would mean to the residents of (as an example) West Sharp Park. If an area is designated as managed retreat, certainly homeowners will need to disclose this to any potential buyers in the event of a sale.

This designation would effect lenders who would not risk making loans in an area that the City has declared they will not protect. Insurance carriers would follow also, making the areas uninsurable.

Is the City of Pacifica willing to allow this consultant to destroy the value of our homes?

Very concerned,
Kathy Moresco

[REDACTED]

•

Click [here](#) to report this email as spam.

Natesan, Sanjana

From: Sue Schectman [REDACTED] >
Sent: Thursday, June 07, 2018 11:57 AM
To: Sea Level Rise
Subject: Comments on Alternative Adaption Strategies Memo-- PEDRO POINT SUBAREA

To: Pacifica Planning Department

Re: Comment on Alternative Adaptation Strategies Memo

Pedro Point Shelter Cove Subarea

The Sea Level Rise project documents, including this memorandum, have designated a portion of Pedro Point, together with Shelter Cove, as part of a defined coastal hazard area. It appears the technical and policy analysis to date has grouped these distinct areas together for assessment and final LCP provisions.

However, these areas are geologically significantly different. Pedro Point is underlaid with bedrock and is dramatically different in risk and vulnerability from the Shelter Cove beachfront. Moreover, there is a great difference in hazards faced by those beachfront lands that are at risk and vulnerable today in real time, versus properties on the Point where the risk and vulnerability from sea level rise is much more speculative and much harder to quantify.

Obviously, strategies suitable for the beachfront may be inappropriate for Pedro Point.

For these reasons, and others including a common sense, pragmatic approach going forward in developing policy, the project documents and maps, including this Memorandum, should either identify Pedro Point as a separate subarea, or include text recognizing the difference in risk and vulnerability between these areas.

Thank you for considering my comments.

Sue Schectman
 Property Owner, [REDACTED] Blackburn Terrace
 Mailing Address:
 [REDACTED] Shamrock Ranch Road
 Pacifica, CA 94044
 cell: [REDACTED]
 email: [REDACTED]

Natesan, Sanjana

From: jim wagner <[REDACTED]>
Sent: Thursday, June 07, 2018 5:46 PM
To: Sea Level Rise
Cc: jim wagner
Subject: economic impact

1 | Has there been a comprehensive analysis, with input from stakeholders, lenders, insurers, and bond underwriters as to the impact various designations of "at risk" a property may be determined to be vulnerable to? Unintended consequences may result in the lendability of properties in at risk designated areas. By "at risk" I refer to any designation that results in an official mapping of an area as an at risk area such as an inundation zone.

Jim Wagner
[REDACTED]

Sent from Mail for Windows 10

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Natesan, Sanjana

From: Brad Wahrlich <[REDACTED]>
Sent: Thursday, June 07, 2018 11:13 AM
To: Sea Level Rise
Subject: Sea Level Rise Comment re Alternative Adaptation Strategies Memo

Dear City of Pacifica,

1 This email is submitted as a comment on the Alternative Adaptation Strategies Memo discussed on May 31, 2018 in relation to Pacifica's Sea Level Adaptation Plan. The Alternative Adaptation Strategies Memo is inadequate and a disservice to the residents of Pedro Point. The City has failed to consider any adaptation measures for erosion generated from the Shelter Cove side of the point. At the meeting, Shelter Cove was discounted as being a single parcel being affected by sea level rise. That is not accurate. According to the GIS web-viewer, over half of the projected erosion for the Pedro Point Community will be caused by Sea Level rise from the Shelter Cove side of the point, which includes land owned by the City of Pacifica.

Thank you for your consideration and I invite further dialogue regarding adaptation measures to protect the Pedro Point Community, including but not limited to armament, beach nourishment, or sand retention structures, etc.

Sincerely,
Brad and Julie Wahrlich

Click [here](#) to report this email as spam.

Natesan, Sanjana

From: Gina Zari <[REDACTED]>
Sent: Thursday, June 07, 2018 5:54 PM
To: Sea Level Rise
Subject: Adaptation Strategies Memo

1 | Please remove all references to managed retreat from any discussion of adaptation strategies. Including managed retreat in a memo, proposal or plan prior to a full and lengthy public discussion about managed retreat and the consequences to homeowners is premature and will only lead to a great deal of anger and anxiety in the community.

Thank you.

Gina Zari

GOVERNMENT AFFAIRS DIRECTOR

[REDACTED] | [REDACTED]
[REDACTED] Woodside Way, San Mateo, California 94401

www.samcar.org | www.facebook.com/samcar.fans



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City of Pacifica - Sea level Rise

RECEIVED

JUN 04 2018

City of Pacifica

We have tried to make contact through 2 E-mails & I've been able to attend only one meeting but I don't believe I will get a reply to my questions.

First off let me state for the record that I consider sea level rise an Fear monger's agenda & is a poorly guised Power grab. All involved in this public Failure of service should be ashamed. Not all of us are blind sheep, some who research know the truth about sea level rise & the real threat.

Here is my question: "CAN you cite for me the name and date of the actual physical experiment which conclusively proved that a few added parts-per-million of atmospheric CO₂ will cause Antarctica to melt & flood the world's coastal cities?"

What happened to the Ice age predicted in the early 70s? Hole in the ozone? Acid rain, global warming? What will be the next climate bogeyman?

Resident of this city for near 50 years.

Jane Steele

SAN FRANCISCO
PUBLIC GOLF ALLIANCE



██████████ Masonic Ave., San Francisco, CA 94117 • ██████████ • ██████████

May 31, 2018

Mayor John Keener and Pacifica City Council
Pacifica City Planner Lisa Wehrmeister
Pacifica City Manager Kevin Woodhouse
170 Santa Maria Ave.
Pacifica, CA. 94044

**Re: Objection to Lack of Reasonable Notice re:
Alternate Adaption Strategies Memorandum, dated May 30,
And Technical and Community Workgroup meetings May 31**

Dear Mayor Keener, City Councilpersons, Ms. Wehrmeister and Mr. Woodhouse,

I received notice by e-mail dated May 30, 2018, 5:58 p.m. of the availability of the ESA-authored memorandum entitled "Alternative Adaption Strategies per Sub-area for Pacifica Sea Level Rise LCP Update."¹ This memorandum is different in substantial and controversial ways from the prior ESA-authored memorandum, dated April 18, 2018 and entitled "Pacifica Sea Level Rise Adaption Background and Example Strategies".²

Among other things, the May 30 Memorandum includes Managed Retreat strategies for most if not all of the sub-areas, including Sharp Park (at page 17), whereas the prior April 18 "Adaption Background" Memorandum did not. (Compare page 17 of the May 30 memo with page 23 of the April 18 memorandum.)

The notice of the May 30 Memorandum came less than a day before the Technical Workgroup and Community Workgroup meetings scheduled for May 31. At this point, I will be unable to attend the Community Workgroup meeting, so will be unable to question the City and its Consultant about the substantial changes between the April 18 and May 30 Memoranda. Pacifica and ESA are running well behind their published schedule for making their studies public. The ESA Workplan published on the Planning Department's Sea Level Rise webpage (http://www.cityofpacific.org/depts/planning/sea_level_rise.asp) lists a February, 2018 date for "identify sea level rise adaption strategies," and an April 2018 date for the Adaption Plan Draft. ([Project Schedule \(updated 9/28/2017\)](#))

¹ ESA, Memorandum, May 30, 2018, Alternative Adaption Strategies per Sub-area for Pacifica Sea Level Rise LCP Update: [Alternative Adaptation Strategies Memo \(5/30/2018\)](#)

² ESA, Memorandum, April 18, 2018, Pacifica Sea Level Rise Adaption Background and Example Strategies: [Introduction to Adaptation Strategies Memorandum](#)

1 (Cont.)

1 (Cont.)

The City should not allow ESA's lateness in delivering key memoranda to effectively deny the public's procedural rights to reasonable public process, notice, and the ability to question and comment on key matters such as the Adaption Strategies, including but not limited to Managed Retreat. We respectfully request that the City correct this defective process by convening another public meeting, upon reasonable notice, on the issues raised in the May 30 Memorandum.

Very truly yours,

San Francisco Public Golf Alliance

Richard Harris

Richard Harris, President

ccs:

Pacifica City Council

Pacifica Public Works Department

Bonny O'Connor, Assistant Pacifica Planner

San Francisco Recreation and Park Department

Congresswoman Jackie Speier

State Senator Jerry Hill

Assemblyman Kevin Mullin

San Mateo County Board of Supervisors

California Coastal Commission, North-Central Coast District

San Mateo County Office of Sustainability

U.S. Army Corps of Engineers, Susan M. Ming, PE

Bo Links

Natesan, Sanjana

From: John Peterson <[REDACTED]>
Sent: Tuesday, June 12, 2018 4:55 PM
To: Sea Level Rise
Subject: A public comment from a Pedro Point resident

To whom it may concern,

1 And that would be me and my neighbors, but I have always been concerned about some kind of rampant development in the Calson owned field. The concern is the flooding that happens there during major storms. I've seen it living here since 1996. And the now happening sea level rise. And where will all the water go to? Development so close to the waves is certainly a major concern, along with the debris that will go into the creek at the back of the property. Old photos show that this area was certainly a wetland, so let's take all this into consideration.

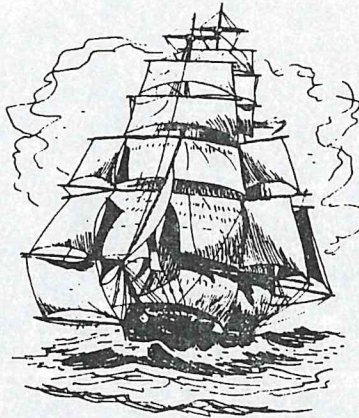
Thanks for the forum,

John Peterson
[REDACTED] Danmann Ave
Pacifica CA 94044
[REDACTED]

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*Dining • Dancing
Cocktails • Banquets*



Letter 40
**Sea Breeze
Motel**



*Serene, comfortable
lodging*

City of Pacifica
Tina Wehrmeister, Planning Director
1800 Francisco Blvd.
Pacifica, CA 94044

June 18, 2018

RECEIVED

JUN 21 2018

City of Pacifica

Attention: Tina Wehrmeister

1 I know why it costs us tax payers so much money to keep the Coastal Commission running. What a well written letter written to you from Jeannine Manna, North Central District Manager. I find it very amusing how well written yet oh so subtle to use their influence to get Pacifica to move their way. "Furthermore, avoiding any contemplation of retreat as an adaptation strategy could open up legal challenges etc., etc., " Ha, and I know all they are concerned about is "recreation habitats development and other resources" is anyone concerned about those of us who are 3rd and 4th generation families whose property is at risk on what manage retreat means to our future. To me managed retreat is just another means of a "Take" which has had its day in court many of times. We have tried to provide for all the reasons the Coastal Commission was elected to do, I'm sorry to say, someone can read between the lines. The Coastal Commission has always been on its own mission. Maybe instead of trying to use its influence on Pacifica they should do what they were elected to do since the 70's and provide more access and recreation on the San Mateo coast, it's a mess.

Thank you,

Charles Gust

cc:

Jackie Speier Carol Groom

Don Horsley Anna Eshoo

Patrick Foster, CCC District Planner Stephanie Rexing, CCC District Supervisor

Kelsey Ducklow, CCC LCP Grant Program Coordinator Bonny O' Connor, Pacifica Planner



Comment Form

City of Pacifica Sea Level Rise
Public Meeting
Saturday, June 23, 2018

Name: Sam Casillas

Organization: Pedro Point Community Resident

Email Address: Samuelcasillas@hotmail.com

- What comments or questions do you have about the suggested adaptation strategies for any of the sub-areas?

The three adaptation strategies for Pedro Point does not consider The State of California's 2014 NRA* recommendation on pg. 12 which states that the SLR plans should include the use of natural infrastructure solutions to mitigate climate risk. The currently undeveloped "Calson" 5 acre field should be included in all 3 strategies for flood/storm surge mitigation.

- Do you foresee an issues with the suggested adaptation strategies for any of the subareas? Please explain.

Yes, if the "Calson" field is developed it will force future flooding onto the rest of the existing developed area of Pedro Point. We should be following the recommendations of the NRA* state document for guidance. If this is not included, the community association may be holding



General Comments

1 (Cont.)

a community meeting to consider
this issue with the Coastal Commission.

*NRA: Natural Resource Agency; Safeguarding
California; Reducing Climate Risk July 2014
pg. 12 paragraph 4

Forms can be returned to staff tonight, emailed to sealevelrise@ci.pacifica.ca.us, or mailed to
Bonny O'Connor, Assistant Planner at 170 Santa Maria Avenue, Pacifica, CA 94044. Comments
will be accepted until 30 days after the release of final Draft Adaptation Plan.

Thank you for your input!

O'Connor, Bonny

From: Gordon Tannura <gtannura@gmail.com>
Sent: Thursday, August 16, 2018 10:54 AM
To: Sea Level Rise
Cc: O'Connor, Bonny; pguzmanus@yahoo.com; James Kremer; Maureen Garcia; julie.a.lancelle@gmail.com; balesl@icloud.com; Samuel Casillas; ldcunha16@gmail.com; Cindy Abbott; Robine Runneals; Jim Steele; Connie; ron maykel; krishnaswamy.shalini@gmail.com; Eileen O'Reilly | Your Personal Realtor; tynipac@gmail.com; Wehrmeister, Tina; Keener, John; Vaterlaus, Sue; O'Neill, Mike; Digre, Sue; Martin, Deirdre; Don Horsley; kevin.mullin@asm.ca.gov; City Manager
Subject: Comments to Final Draft Sea Level Rise Adaptation Plan - July 2018

1 I am offering the following as public comments to and questions pertaining to the Final Draft Sea-Level-Rise Adaptation Plan. These comments are focused on improving the analysis that has been drafted, as it must be as accurate and appropriate an analysis that can be made with information in hand with limited speculation. Bad data only leads to bad decisions. In general, I find important data missing from the latest versions, as well as some data requiring validation and revision. I have been left to *assume* several data sources as accurate and appropriate, but assumptions in any analysis are very dangerous. My concerns are heightened by the potential for unintended consequences (e.g., property value reduction for all Pacificans, insurance cost increases, financial availability for city and private citizens, triggering of FEMA zones reapportion) of the analysis and policies ultimately resulting in the LCP.

2 I reject the use of date ranges to define when certain actions are to be initiated for each of the adaptation priorities, as there are too many unknowns and variables to consider timeframes for action. I endorse the approach of using triggers, which are identified on p 20, but need more information on the thresholds identified. For example, we need to know the current (2018) beach width, and how and when and from what point it's measured (e.g., mean high tide or low tide, and at what exact point the measurement is taken). This concern is heightened having heard and read of many conflicting comments and various reports as to SLR extent and timing. These will need to be closely monitored (see comment below) for sea level change so as to initiate actions accordingly. Coupled with the probabilities identified in the report, it is not appropriate to speculate on timing for certain activities. For example, for Fairmont West, Armoring (p 23), I believe it is appropriate to say the first action is required now - maintenance and upgrade should always be recommended as a practice for property owners, especially given violent storms that cannot be predicted. Further, the second recommendation should be modified to reflect the trigger values when actions should be taken.

3 Regarding Monitoring Change (p 20), such monitoring will need ongoing attention (even perhaps by dedicated staff) and at least as a documented responsibility to current staff members' job descriptions and accountability. Such responsibilities would include to monitoring conditions against thresholds and regularly informing staff and the public as to current state. It should also be that the city staff work closely with private property owners to support their chosen strategies, together, so one does not thwart the other and together work for the benefit of both. Actions identified on page 16 (Hazard Mitigation Plan) reinforces the city's responsibilities in this regard and should be expanded to include a collaboration with private citizens particularly at risk. We all know that the situation is very dynamic! The city needs to further recognize this, within the plan, as a top priority!

4 Regarding the Adaptation Measure of the Transfer of Development Rights (TDR - page 35), what is the extent that TDRs can be realistically valued and used? Are there market figures that can be identified, and current circumstances (not more than 5 years ago) that can exemplify that approach? What are the rights, in general, of the structures that may be in danger and of what value do they have In Pacifica? How many undeveloped

4 (Cont.) parcels could this be realistically applied to (i.e., that don't already enjoy the same development rights) and for what value?

5 I have numerous concerns for the costing data as described below, mainly driven by the lack of data that might substantiate identified costs/benefits:

- There is no costing supplied for gas and electric relocation/re-engineering. I know that, as has been stated in the past, PG&E will not provide their cost data, but a proxy might be chosen (e.g., cost to underground electricity on Palmetto), or it should be clearly indicated in cost estimates that these are not included.

6 - Were unit costs alone applied to costing figures? What about what undoubtedly will be substantial costs for project level planning - studies, reviews, designs, funding costs, consultant fees? Might those be required for all alternatives, but at varying degrees?

7 - What is the degree of error that can be applied to all estimates (plus or minus)? Given the unknown, what is the extent of potential error across all estimates - 100%? 50%? As I have personally witnessed, there are many unknowns that are revealed once you start ripping up infrastructure.

8 - There is no costing supplied for relocation costs, potential property value reduction, increased insurance costs, increases in financial costs, disruption and loss of productivity costs. While these may be speculative, they are probably no more so than other values (e.g., beach recreational value) used in the analysis.

- I reject the use of the \$40 value applied to beach use. It is not sufficient to say it's been used elsewhere, except to say that it might be wrong! We have no view as to what substantiates that figure - in contrast, I know I walk to the beach almost daily and inject no more economic value or benefit than I would if the beach was not there (choosing to walk elsewhere). I'm not alone in residents' visits which are similar, yet perhaps we are all counted in visit figures which are not supplied. A further example - the very recent Dog Surfing Championships brought many people to the beach - both locally and significantly from around the region. Did the Pacifica economy have a meteoric value as a result? One might take a poll of business owners to see whether increases in business amounted to what I would expect would be hundreds of thousands of dollars from that event alone (if the \$40 value per person is used). I truly believe there are benefits, but nowhere near the figure you've identified. Expose the methodology! In addition, as noted, "One area where data was very limited was beach recreation, except for Pacifica State Beach." It seems that any benefit value from this aspect is highly suspect, and "very limited" might be changed to "non-existent".

10 - All of the underlying data for the cost-benefit analysis needs to be exposed. There are unit costs for engineering that are provided, but cannot be easily validated in calculating gross costs. Without the complete set of data to examine for completeness and accuracy, the charts are merely pretty (inaccurate) pictures without substantiation.

11 - As presented, there appears to be no engineering cost associated with managed retreat. That can't be true, as such a retreat may still require infrastructure changes, existing structure removal, and other relocation costs, as well as engineering to design a thoughtful adaptation.

12 - Why have only 2 areas been included for the impact to the loss of sales tax and TOT's (West Linda Mar, Rockaway)? Certainly Pacific Manor and West Sharp Park could suffer the same. Note also there should at least be some consideration for the old Sewer Plant property and its potential for hotel and sales tax loss should a development, as is being actively considered, come to fruition.

13 - Please explain the cumulative amounts for all tables for "Expected Losses in Property Tax Revenue". For example, for Table 17, I do not understand how an amount for a one year loss of \$4000 only cumulatively amounts to \$62,000 (no discount rate) over a 32 year period. Further, a slight increase in taxes are allowed under Prop 13, and should be factored in over the time period. It would also be helpful to identify in an appendix the base data from which the losses are derived.

14 - It is not intuitive that "additional benefits of Alternatives 1 and 2 can be considered to equal avoided cost of damages under Alternative 3." Please provide, in a detailed form, a better definition of the benefits you are citing and the offsetting detail of damages, and preferably provide a verifiable example.

15 - Overall, the cost-benefit analysis would greatly benefit from real life examples throughout and/or case studies.

16 For the “Adaptation Alternative Analysis Results”, Alternatives 1 and 3 seem to lead to the same conclusion - no beach width over time, and similar, and in some cases identical, curves for the loss of beach over time. Is this indeed correct? Only Alternative 2 seems to have any value relative to maintaining beach width.

17 For the Fairmont area, what would be a realistic realignment on Palmetto Avenue if it must be done? Tunnel under Highway One? Is it absolutely necessary that those residents have the same alignment for access they have today? Please identify what was considered in the cost estimate - merely a replacement cost for the length of affected area today or in fact an alternative realignment that I believe will have significantly more engineering cost?

18 The information supplied in Appendix G is not germane to the policies that will be developed, and certainly no more so than other private property. It may be public property, but not of Pacifica. Further, the information in the Appendix is inaccurate and misleading and is not substantiated, consistent, nor indicated by the City of San Francisco’s valuation of maintaining the property. The indication that its use has had “significantly degraded” is not supported by court decisions, and in fact the habitat was created as a result of the construction of the golf course. Also, the land itself must have tremendous value that should not be discarded. Given its lack of contribution to any aspect of the analysis, San Francisco’s obvious intent on maintaining the berm, and questionable assertions, Appendix G should be deleted.

19 Finally, I truly appreciate and support a long range view on planning for some sea level rise, but to suggest costs and actions for 2100 is foolish at this time given the many variables in play. Given the level of uncertainty surrounding climate change and sea-level rise, the study authors urge caution in interpreting estimates after 2050, and I concur. The California Coastal Commission grant funding for the project requires an examination of 2100, but such a forecast has such a wide margin of error that it would in effect be useless, and the Coastal Commission should be told so.

Thank you for the opportunity to comment.

Sincerely,

Gordon S. Tannura
Community Work Group Member

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Comments on Final Draft Adaptation Plan

James Kremer, CWG Member

August 26, 2018

1. Table 2. I support the emphasis on triggers, but values seeming to give ranges are unclear. After being confused by ranges, the footnotes helped. (Seems from comments submitted by Tannura & copied to the CWG, that he was similarly confused.) Even with notes, saying “100-110” when you mean “100 for homes OR 110 for bluffs” is confusing. Better notation? Or some prose to explain an example.

Also, why would it be “>6” for one case? A threshold of 6 implies the trigger when crossed. Is there a reason this one entry had the “>” sign?

2. TDRs are suggested in a number of cases. Presumably details are left unstated in hope the city will work this out later. Perhaps. But I see more serious issues – the explanation in earlier documents clarifies that these are DEVELOPMENT credits. It is clearly stated that this only applies to undeveloped property. That means this mechanism won’t help with the majority of property owners, who own structures. This is a bigger problem than undeveloped lots! Are any options being suggested for them?

This actually is quite important. Public panic over managed retreat might be alleviated if specific types of response were suggested other than giving in to the rising waters! I have suggested that there are creative options such as tax incentives or rebates to incentivize desired actions, or grants to help with raising a house or adding a story and converting the lower floor to parking and storage, or gradual buy-outs a few at a time over many years, like eminent domain, etc. I know these are fraught, but some plausible action like TDRs for undeveloped property could suggest to these residents that the city will work with them, adaptive responses not just retreat.

3. Confusion about triggers vs. time-based plans. I wrote the following in a letter to the editor of the Trib., included below. This is my greatest concern. I think the Draft should be revised to clear up this apparent contradiction. The introductory paragraphs for Sec. 5 are ambiguous. When I asked about this at the Public meeting, Dr. King’s answer seemed to agree with my interpretation. Along with the benefit-cost histograms for each reach, phrasing could be something like, “A typical comparison of benefits & costs when triggers are met, for one example SLR scenario.”

Personally, I think that this can be helpful by casting the econ Benefit-Cost analysis in light of helpful examples, and NOT actual scenarios for specific times in the future under specific SLR scenarios. Since these are only examples, they may not require the same precision and explanation that they would if they were the directives for action.

My letter to the editor:

*“At the August 11 meeting on our **“Local Coastal Plan,”** there was confusion about a point I think is pivotal. Many objected to linking adaptive responses to specific predictions of sea level rise (SLR). Parts of the document (“Final Draft Adaptation Plan” at www.cityofpacific.org) appear to do this – but they don’t.*

*Coastal Commission constraints allow Planning based either on **triggers without any firm reference to timelines**, or on **time-based scenarios with specific projections of SLR over time**. At first glance, the document seems to be a hybrid: “Thresholds for Hazard-Specific Measures” (Table 2, p. 20) gives “adaptation triggers”, where responses depend only on indications of rising sea level when actually observed. Later in the document, the economic Benefit-Cost Section (5.3-5.4) repeatedly presents comparisons for 2018, 2050, and 2100 assuming a rate of SLR, which negates a main advantage of trigger-based planning. What is actually proposed?*

*The answer is that the economic scenarios are not the response plan. Protocols for the economic analysis **require** a time-based framework. The analysis assumes the “medium/high rate of SLR” (6’ by 2100), to calculate comparative financial implications at 3 specific times, but this section is only*

an **example** to show financial implications. It **does not replace** the trigger-based recommendations. Consulting economist Phil King confirmed this at Saturday's meeting.

SLR projections are uncertain (e.g. +3 ft to +6 ft, or even +10 ft by 2100). Some people feel that slight recent increases in local SL mean this global phenomenon will not affect us as much. Others object to including contingent plans for managed retreat with large SL predictions, even though these are required by the CCC. The trigger-based program of adaptive responses answers these and other objections.

It specifies thresholds for adaptive responses to low and high risk cases, with action only when evidence warrants it."

4. Personally, I worry a lot about the details for the economic analysis. I have studied (& taught) related subjects and I am familiar with the approaches. It is enough to say, many facets of the accepted practice are challenged by professionals, and alternatives have been used. However, I do not think a more elaborate analysis, or discussion of strengths, weaknesses, and alternatives is within the scope of this facet of the grant. Instead, emphasizing that the econ section is one hypothetical example, so the public can appreciate the general patterns of Benefits-Costs for the trigger-based options is sufficient and ideal.

One glaring example is the non-market valuation of public beaches as a fixed \$-rate from the literature with a conventional discount rate – is this called “present value”? For me, this is flawed to the point of being misleading. No tally which sums the cumulative value of public trust assets by decreasing it toward **no** value can be justified. Instead, zero or even a negative discount rates are appropriate ways to capture the **increased** value of diminishing natural assets, and have been used in ecological economics. I think Phil said he used a rate of zero in another study – why not here? A brief nod to explain this problem is offered top p. 67 & Table 15. I'd argue that using a discount rate of zero for ALL asset classes would be better than what is done now.

Most importantly, many substantive objections to the econ analysis are eliminated by making clear that this analysis is an example only, made with internally consistent assumptions, but not predictive, and certainly not meaningful for the long time horizons being considered (my comment 3).

5. Ch. 5 (Adaptation Alternatives Analysis, doc. p. 34ff) does not make it clear that the detailed economic analyses that follow are based on one SLR scenario (this is stated top p. 23). Since most earlier documents in our process implied that a suite of projections would be considered – 3 or 4 SLR rate projections at year 2050 and 2100 – it would be useful to reiterate this. As I mentioned above, I think this new emphasis explicitly on triggers works strongly in the City's favor in countering much of the adverse public reaction. Make this changed emphasis clear **early and often**.

Another place this could be clarified but now remains unclear is doc. p. 59 (file p.63): “The shoreline evolution model was applied to track beach width, shoreline erosion and backshore erosion through time.” I assume this is for the single example case “medium/high rate of SLR”. One specific scenario was used only, again to allow economic calculations.

6. Despite the loud public outcry over managed retreat, it is important to include it. Not just because the CCC requires it (!) but because the triggers should handle extreme cases, where other adaptive responses are no longer viable. This is sensible for such a long range plan as this. Stick with it! ☺

7. Minor typo correction. Two of the tables of Sub-area Adaptation Strategies retained the numbering, “1, 3, 3.” I think this is a typo carried over from an early draft. Doc. p. 44, 47.

8. Ecosystem Services. Uncertainty in these calculations are great, and I understand why it was mentioned briefly and omitted. Indeed, “policy makers may wish to consider these potential impacts” (p. 86) and It would be helpful to summarize general conclusions as to the relative size of these benefits somehow.

8 (Cont.) Doesn't Costanza offer some general assertion of this which could be helpful to planners who at present probably know nothing of the potential value of including this?

O'Connor, Bonny

From: ron maykel <themaykelfamily@sbcglobal.net>
Sent: Tuesday, August 28, 2018 11:19 PM
To: O'Connor, Bonny
Subject: Sea Level Rise LCP Suggestion

Hi Bonnie, please enter this 11TH hour suggestion/comment.

Please consider entering information as evidence of all activities in Pacifica where abandonment, demolition, retreat, repairs and design modifications have taken place into the LCP final draft. Such as.....

1. The several apartment buildings and two houses on Esplanade Ave.
2. The SFRV Parking lot retreat.
3. The Linda Mar Beach Management Plan with the demolition of two houses.
4. Several sections of California Coastal Trail closed off due to bluff retreat.
5. Beach Boulevard sea wall repairs.
6. And others?

Thanks

Ron Maykel

Click [here](#) to report this email as spam.

O'Connor, Bonny

From: Connie <constellation747@comcast.net>
Sent: Wednesday, August 29, 2018 3:09 PM
To: Sea Level Rise
Cc: O'Connor, Bonny; Woodhouse, Kevin; gtannura@gmail.com; emkoreilly@gmail.com; Jim Steele [REDACTED]; Wehrmeister, Tina; rharrisjr1@gmail.com; Kathy Moresco; michael.j.oneill@sbcglobal.net; Sue Vaterlaus; John Keener
Subject: Public Comment on Final Draft SLR Adaptation Plan

I am a member of the Sea Level Rise (“SLR”) Community Work Group (“CWG”) and hereby offer the following comments to the City of Pacifica’s Final Draft Sea-Level Rise Adaptation Plan.

By way of an introductory caveat, I absolutely “get” (*i.e.*, appreciate) the argument that Managed Retreat (“MR”) should be just another “tool in the toolbox” available to the City in the indefinite future should we need it (presumably, as a last resort when all other adaptation measures fail). I am not a Sea Level Rise/Global Warming Denier. I respect the overwhelming consensus of reputable climate change scientists.

However, I am extremely concerned that the SLR Adaptation Plan in its current form, with its inclusion of MR as an option in many sub-areas, sends an alarming present-day message to Pacifica’s citizens. I fear it may precipitate a cascade of unintended consequences that will inevitably impact Pacifica residents, property owners, business proprietors and potential investors now (*e.g.*, loss in property values and tax revenue, rise in insurance premiums, unfunded mandates, discouragement of investment capital, improvements and business development). It is not hyperbole or “fear-mongering” to conclude that inclusion of MR in Pacifica’s LCP is tantamount to ceding local control of our City’s political and economic destiny. Notably, at a recent Pacifica appearance, California Assembly member and Speaker Pro Tem Kevin Mullin cautioned the City against “embedding” managed retreat into its coastal plan and, thereby, risking a lowering of property values.

The best scientific evidence available to date regarding SLR extent and timing is uncertain and speculative. The data is incomplete. The incompleteness and speculative nature of the SLR data (and resulting analyses based on potentially faulty data and assumptions) render timeframe benchmarks (especially 2050–2100 planning horizons) virtually useless. I support the use of measurable adaptation thresholds (“triggers”; *See*, pages 18 *et seq.* of the Adaptation Plan) in determining when and where specific adaptation options should be implemented. I do not accept that in 2018–2050 we must choose between mutually exclusive objectives of saving our coastal properties, businesses and critical public infrastructure *versus* “saving our beaches” and coastal habitats.

The evidence presented by the City, ESA and the California Coastal Commission (“CCC”) clearly establishes that the inclusion of MR in the Final Draft Adaptation Plan (and, ultimately, the City’s updated LCP) is not mandatory. Various documents and correspondence generated by the parties use *discretionary* language such as “advisory”, “suggests” and “recommends”. Arguably, the City and its consultants satisfied CCC grant program requirements by conducting an in-depth assessment of all accommodation, protection and retreat adaptation strategies for each of Pacifica’s sub-areas. After engaging in its “rigorous analysis” and receiving robust community input, the City should *at the present time* soundly reject inclusion of MR as premature, subject to re-evaluation as the accuracy of scientific projections improve and the occurrence of triggering events. **Section 3.4 Reevaluation** of the Adaptation Plan clearly anticipates that “the Adaptation Plan will be re-evaluated and updated in the future to capture advances in sea-level rise science and adaptation strategies.” (*See*, page 21 of the SLR Adaptation Plan.)

1 (Cont.)

Section 4.1 Sub-area Adaptation Recommendations recognizes that “the immediate costs and impacts [of managed retreat/realignment] to the City’s adopted goals would be severe compared to the benefits speculated in the long-term future, which makes this option difficult to support and implement in the near-term.” (*See*, pages 7, 22 **and 87** of the SLR Adaptation Plan.) Accordingly, I strongly recommend that the City reject Managed Retreat and pursue alternative hybrid solutions to protect high risk assets in the near term, possibly incorporating select retreat concepts into more appropriate *accommodation* options or strategies.

2

In closing, I want to express my concurrence with the public comments (and questions) of fellow CWG member Gordon Tannura, submitted to the City on August 16, 2018.

Respectfully submitted,
Connie Menefee

Sent from my iPad

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From Robine Runneals my comment to SLR Public Meeting, 8.11.18

1. I'm a resident and property owner in West Sharp Park since 1976.
2. The Adaption Plan's analysis is obviously incomplete, and obviously incorrect in several areas. And Pacifica should not be making decisions based on a such a flawed analysis. So I'm asking the Planning Department and the City Council to get better and more complete and more reliable information before they make decisions about the sea walls which protect our neighborhoods – including my own neighborhood. Here are a few of the problems that I see.

Businesses. At page 85, the Report says that it has not analyzed key business considerations: the loss of businesses in the neighborhoods west of the Coast Highway; loss of tax revenues from those businesses. Also, obviously, loss of jobs to people employed in those businesses. All these are potential costs of managed retreat that must be analyzed.

Taxes: The Draft Plan, at page 85, gives a quick analysis of property tax and other tax impacts through 2050, but not for the 2100 time-frame.

The Coast Highway. At the Coastal Commission hearing which I attended in November 2017, Central Coast District Director Dan Carl testified that if the Sharp Park levee were removed, there would be a 100% chance of flooding in the neighborhoods, and “a whole new can of worms” for the Coast Highway. I don't see any discussion in the Adaption Plan of effects on the Coast Highway of managed retreat.

Low-cost and multi-family housing. This is inadequately analyzed in the Report. My West Sharp Park neighborhood has older single-family housing and apartment houses. This is the most reasonably-priced housing in Pacifica. And yet the Draft Plan's Appendix C – the Adaption Overview Sheet – for my neighborhood says there is only one single building in my neighborhood with “affordable housing”. This is obviously wrong, and needs to be corrected. Either ESA's data sources are wrong, or its definitions of “affordable” are goofy. But whatever the problem, this must be corrected – because it is obviously wrong.

Trails. There are lots of trails, including the Coastal Trail between the Pier and Mori Point. But the report places no value on the Coastal Trail or any of the trails. The beach in West Sharp Park has an undertow and a history of drownings, and they are posted as dangerous. Most people stay off the sand, and keep to the trail on top of the sea wall and the levee.

7

Red-legged frog and SF garter snake. The Report places no value on Sharp Park wetlands or on the California red-legged frog and San Francisco garter snake habitat in those wetlands. The Coastal Commission in November 2017 granted a permit to San Francisco for the Sharp Park levee, and required San Francisco to maintain the levee and its armoring, to protect the endangered species, the golf course, and the neighborhoods.

8

I'm asking the City of Pacifica that before adding the managed retreat option to this document to publically examine its possible unseen early impact to us all. If the goal of this process through Environmental Justice is to protect our neighborhoods and managed retreat is included in this finished document we need to understand the long and short term consequences spelled out in more details. That's missing in this Adaptation Plan for the public to understand. Is it the best decision to for the City, property owners and businesses to have managed retreat immortalized in this public document? Will we see as a result a deterioration of our City long before the sea level rises?

Thank you,
Robine Runneals
West Sharp Park

CALIFORNIA COASTAL COMMISSION

NORTH CENTRAL COAST DISTRICT OFFICE
45 FREMONT STREET, SUITE 2000
SAN FRANCISCO, CA 94105
PHONE: (415) 904-5260
FAX: (415) 904-5400
WEB: WWW.COASTAL.CA.GOV



June 12, 2018

Tina Wehrmeister
Planning Director
City of Pacifica
1800 Francisco Blvd.
Pacifica, CA 94044

Subject: City of Pacifica Draft Adaptation Plan

Dear Ms. Wehrmeister:

Commission staff would like to express appreciation for the ongoing coordination and collaboration between our respective staffs as we move forward with the development of a Local Coastal Program Update (LCP update) to address potential future impacts related to sea level rise within the City of Pacifica. As a part of this process, Commission staff has participated as active members of the Technical Working Group, participated in the public workshops, and reviewed and commented on the Vulnerability Assessment and the Draft Adaptation Plan. Most recently, our coordinated efforts have focused on the Draft Adaptation Plan that will provide actionable information related to potential adaptation options for the City and eventually dictate the approach the LCP update will take to planning for sea level rise.

1 Commission staff previously provided comments on the draft of the City's Adaptation Plan (the Plan) via telephone conference on May 22, 2018, expressing concern that managed retreat and landward redevelopment was not more thoroughly explored as an option for long-term adaptive planning for areas that contain private development (along with some public infrastructure) in Pacifica's Coastal Zone. Commission staff strongly recommends that such an exploration of managed retreat be included in the Plan, as it is an important strategy to consider to assure that the Plan is an effective tool for use in developing an LCP Update that proactively protects coastal access, recreation, habitats, development, and other resources. Critically, analyzing a broad set of adaptation options also reflects the recommendations of both the Commission's adopted Sea Level Rise Policy Guidance document and the draft Residential Adaptation Policy Guidance document, as well as a variety of statewide guidance including the State of California's Climate Adaptation Strategy/Safeguarding California (2009, 2014, and 2018) and the Ocean Protection Council's State of California Sea-Level Rise Guidance (2018). Moreover, it is included in the City's own work program under which this adaptation report is being completed, as funded through grant by the CCC. Specifically, the grant agreement states that "the city will evaluate new accommodation, protection, and retreat strategies for each subarea listed above and compare how these address vulnerability and risk."

The overarching goal of long-term adaptation planning, as compared to the LCP policies and

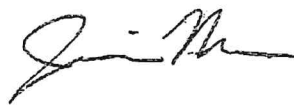
1 (Cont.)

permitting decisions that are implemented in the short-term, is to discuss the range of planning options available to the City to address known vulnerabilities. This process is relevant for both immediate and future threats, and to identify the priority short-term strategies to implement while continuing to analyze and develop long-term options. Since decisions made today will have impacts on future resilience (for example, development that is constructed today is likely to be present in 75-100 years), it is critical to consider long-term options. Retreat is an important option to consider in the long-term, particularly for a city like Pacifica, which has dealt with significant threats to blufftop development that has necessitated the removal of this development, and where it is unclear that other options will be able to ensure long-term protection of beaches and coastal habitats, as required by the California Coastal Act. While managed retreat may not be a feasible or preferred strategy over the short- or medium-term, the scale of long-term vulnerabilities identified in the City's vulnerability assessment suggests that it is an important strategy to start to evaluate so that the City and its citizens and visitors can begin to understand the types of strategies that may be necessary to protect coastal resources, the trade-offs associated with different strategies, and the options for implementing various strategies throughout the City and over various planning horizons. Importantly, the Coastal Commission is not suggesting that managed retreat is a strategy that must be implemented in the short-term (or even in the long-term necessarily), but rather that it be evaluated so as to understand the conditions under which it might be necessary or preferred.

Furthermore, avoiding any contemplation of retreat as an adaptation strategy could open up legal challenges to the City's work related to full disclosure of potential coastal flooding and erosion hazards. By not identifying that future retreat may be necessary to respond to higher amounts of sea level rise and/or threats from increased erosion and/or flooding, the City may be opening itself up to legal risks. Given the uncertainty regarding future sea level rise and the possibility for increased erosion and flooding hazards the City should begin to put property owners on notice now, that different adaptation options, up to and including retreat and relocation, may be necessary to limit flood risk or erosion threat. The inclusion of a discussion of managed retreat and relocation as an option for adaptive planning puts property owners on notice of the potential array of adaptive planning approaches that may be necessary in the future.

Again, we greatly appreciate the ability to be a part this important planning effort and look forward to continued coordination and discussion of this important topic.

Sincerely,



Jeannine Manna
North Central District Manager

cc: Patrick Foster (CCC District Planner)
Stephanie Rexing (CCC District Supervisor)
Kelsey Ducklow (CCC LCP Grant Program Coordinator)
Bonny O'Connor (Pacifica Planner)

O'Connor, Bonny

From: Potter, Spencer (REC) <spencer.potter@sfgov.org>
Sent: Tuesday, August 28, 2018 11:42 AM
To: O'Connor, Bonny
Cc: Wayne, Lisa (REC); Stokle, Brian (REC); Madland, Sarah (REC); Ginsburg, Phil (REC)
Subject: SFRPD comment on Pacifica LCP Final Draft Sea-Level Rise Adaptation Plan

Dear Ms. O'Connor,

Thank you for providing the opportunity to comment on the July 2018 Final Draft of the Sea-Level Rise Adaptation Plan for Pacifica, CA.

As described in our May 17, 2018 email comment (included below), the economic analysis methodology selected for the Pacifica LCP update process suffers from significant deficiencies. Namely, the cost-benefit analysis gives no valuation to the potential loss of wetland and endangered species habitat, and also significantly devalues recreational property (as compared with residential/commercial property) by assessing recreational assets by use rather than fair market value.

1 Regrettably, these deficiencies have not been remedied in the Final Draft of the Sea-Level Rise Adaptation Plan, and instead have been carried over and expanded upon. These assumptions result in the flawed conclusion that a managed retreat Adaptation Strategy in the Sharp Park sub-area is the least expensive available option (because under the model the dollar amount of potential public property loss due to erosion and flooding is found to be significantly less than the engineering costs for the other alternative Adaptation Strategies) (see p. 75 of the Final Draft plan). Given the enormous ecological value of Laguna Salada as a wetland and endangered species habitat area and the significant historical and recreational value of Sharp Park's recreational assets, we find this conclusion to be implausible, and reflective of fundamental flaws in the economic model's underlying assumptions.

SFRPD respectfully urges Pacifica to incorporate these comments, and the similar comments made on May 17, 2018 (included below), into a revised economic analysis for the Pacifica LCP Update.

Thank you,
 Spencer Potter

Spencer Potter, J.D.
 Natural Resources Regulatory Specialist

San Francisco Recreation and Parks Department
 811 Stanyan Street | San Francisco, CA | 94117
 (415) 242-6373 | spencer.potter@sfgov.org



Visit us at sfrecpark.org
 Like us on [Facebook](#)
 Follow us on [Twitter](#)
 Watch us on [sfRecParkTV](#)
 Sign up for our [e-News](#)

 Please consider the environment before printing this e-mail.

From: Potter, Spencer (REC)
Sent: Thursday, May 17, 2018 4:00 PM
To: 'oconnorb@ci.pacifica.ca.us' <oconnorb@ci.pacifica.ca.us>

Cc: Wayne, Lisa (REC) <lisa.wayne@sfgov.org>

Subject: SFRPD comment on Pacifica LCP Economic Analysis Memorandum

Dear Ms. O'Connor,

Thank you for providing the opportunity to comment on ESA's May 4, 2018 Economic Analysis Memorandum for Pacifica's Sea Level Rise LCP update. Please find the San Francisco Recreation and Park Department's comment below.

1. Pacifica Should Include the Cost of Mitigating Potential Loss of Wetland and Endangered Species Habitat in the Local Coastal Plan's Economic Analysis.

As detailed in Pacifica's January 2018 Draft Sea Level Rise Vulnerability Assessment, Sharp Park's Laguna Salada wetlands complex and upland endangered species habitat areas (as well as the contiguous wetlands and habitat at Mori Point) are at risk from wave run-up, storm flooding, and coastal erosion under several of the coastal hazard exposure scenarios being evaluated in the LCP update (see pp. 18-19; Appendix D). The May 4, 2018 Memorandum states that its purpose is to provide "the best available information on the aggregate economic value of property and activities at-risk due to hazards associated with sea-level rise" and that this analysis will be used to "inform decision-makers and stakeholders about the economic considerations associated with various sea-level rise scenarios and adaptation options available..." (May 4 Memorandum, p. 2.).

However, as described in the May 4 Memorandum and confirmed by ESA during the May 10 Community Meeting's Q&A period, the cost of mitigating the potential loss of wetland and habitat areas is currently not included in the LCP's economic analysis. SFRPD respectfully urges the City of Pacifica to include in its economic analysis the anticipated cost of mitigating for the potential loss of the Laguna Salada and Mori Point wetlands and upland endangered species habitat so as to ensure that (1) ecological values are fairly considered in Pacifica's land use planning process, and (2) that the absence of an important class of assets listed in the January 2018 Vulnerability Assessment does not render the economic analysis incomplete to the point of being unreliable. The cost of mitigation should include the full costs of purchasing, engineering, and enhancing appropriate substitute habitat in consultation with expert biologists on the species, translocation of endangered species populations, etc., with the goal of achieving "no net loss" of wetlands or endangered species habitat. Guidance on valuing compensatory mitigation for the loss of wetlands and endangered species habitat is readily available for incorporation into this analysis, and during the May 10 Community Meeting's Q&A period ESA intimated that they have conducted this type of analysis for previous projects.

2. Pacifica Should Value the Sharp Park Golf Course in Terms of Market Valuation.

The May 4 Memorandum states that the economic value of the Sharp Park Golf Course "will be approximated in terms of fees generated per year" at the golf course. (May 4 Memorandum, p. 5.) However, this method of valuation does not take into account the important historical value of the golf course nor the fact that Sharp Park's green fees, like those of most public golf courses, are subsidized far below market rate. Moreover, the approach of using non-market valuation (valuing in terms of use/fees rather than the market value that would be paid for a similar property) for recreational assets, as described on pp. 4-5 of the May 4 Memorandum, devalues recreational property as compared with residential and commercial real estate (which is valued according to normal market valuation). SFRPD respectfully requests that Sharp Park Golf Course is valued in terms of market valuation (i.e., the going market rate for a coastal golf course of similar acreage with similar historical value), so that its true valuation is included in the analysis.

Thank you,
Spencer

Spencer Potter, J.D.
Natural Resources Regulatory Specialist

San Francisco Recreation and Parks Department
811 Stanyan Street | San Francisco, CA | 94117
(415) 242-6373 | spencer.potter@sfgov.org

CALIFORNIA COASTAL COMMISSION

45 FREMONT STREET, SUITE 2000
SAN FRANCISCO, CA 94105-2219
VOICE (415) 904-5200
FAX (415) 904-5400
TDD (415) 597-5885



To: Bonny O'Connor
From: Coastal Commission staff
Date: August 29, 2018

RE: Coastal Commission staff comments on the July 2018 *Draft Sea-Level Rise Adaptation Plan*

Dear Ms. O'Connor:

1 Thank you for the opportunity to comment on the July 2018 draft of the City of Pacifica's Sea Level Rise Adaptation Plan. This report is a deliverable for Task 3 of the City's LCP Local Assistance Grant, LCP-16-01. This draft includes a cost-benefit analysis and shoreline evolution findings for various adaptation alternatives for seven sub-areas in the City, as well as recommended adaptation approaches based on this analysis, and is meant to provide a foundation for developing new and updated LCP polices to help the City respond to sea level rise. Previous versions of this document which laid out the different adaptation alternatives that would be analyzed were also reviewed by Commission staff.

Overall, Commission staff believes that the Adaptation Plan currently lacks critical details regarding the feasibility of various approaches, does not provide for an adequate cost-benefit assessment of different adaptation alternatives, and lacks a defined adaptation approach that would meet Coastal Act requirements related to the protection of coastal resources for current and future generations. Given the criticality of this information for guiding policy development for the City's LCP, Commission staff recommends the following questions and concerns be addressed and that the adaptation plan be revised as necessary.

- 2 1) *Recommended Adaptation Approach*: In general, the adaptation plan seems to recommend an approach whereby development throughout the City would be protected with hard armoring, while beach nourishment would be used in continuity to try to preserve a stable beach width and retreat would be carried out on a voluntary basis. However, as discussed below, there is no analysis of how long shoreline armoring and beach nourishment would be feasible from an engineering or economic standpoint, and no discussion of the types of policies or programs that would allow the City to prepare for retreat at the scale necessary to relocate structures out of hazardous areas. The resulting emphasis on armoring would likely result in the loss of beaches and their associated public access, recreation, and habitat benefits as sea levels rise, and would leave the City unprepared for sea level rise in the long term. While armoring may protect existing development in the short to medium term, such an approach may not be technically or economically feasible in all areas and/or over longer timeframes, and would not, by itself, be consistent with Coastal Act requirements to ensure protection of coastal resources. This adaptation plan should be revised to identify how the City will

2 (Cont.)

balance the dual Coastal Act goals of ensuring safe development and protection of coastal resources such as beaches, habitat, and public access and recreation, as sea level rises over time.

2) *Managed Retreat*: Please update the discussion of managed retreat throughout the document by addressing the following questions and concerns.

3 a. On page 35, managed retreat is described as a strategy that encompasses the use of various measures such as short-term armoring or beach nourishment, which can buy time for existing development but eventually allows for shoreline recession over the long term. In addition, on page 22, the report states that retreat may be cost effective in the long term in many subareas. Staff agrees with this characterization, but in order to effectively implement retreat, a long-term planning approach is important to begin implementing now, including with strategies such as: limiting the extent and types of new development allowed in areas exposed to an increased risk of flooding or erosion; requiring hazards disclosures; requiring property owners to assume risks of those hazards; requiring new or existing development to be removed or relocated under certain conditions (e.g. when it is declared unsafe for occupancy, when access and utilities are no longer available to serve the development, when the blufftop edge erodes to a minimum setback line, or if required to be removed by subsequent adaptation planning); not allowing shoreline protection for new development (consistent with the Coastal Act); and ensuring that redevelopment is also sited and designed to be safe from sea level rise hazards without the reliance on existing or new shoreline armoring. Importantly, these types of policies would apply to both public and private development. Additionally, framing the idea of managed retreat as only *optional* for private development mischaracterizes this approach. While voluntary relocation would certainly be an important part of such a strategy, it alone would not ensure that structures are removed before they become unsafe (such as was the case for the red-tagged apartment buildings in the City) nor would it ensure long-term protection of beaches and natural shoreline processes. Potential triggers for removal or relocation of existing development should be discussed accordingly.

4 b. In the “Potential Funding Sources” section (pg. 31) the plan states that private property owners would be responsible for funding adaptation projects for their properties. While this may ultimately be true, the City can, and should, play a role in helping private property owners identify potential grant funding and/or other methods for adapting to sea level rise. Indeed, this concept is included in the City’s Hazard Mitigation Plan, as identified on page 16.

5 c. Managed retreat has not been analyzed for the area of West Linda Mar because this area is “outside of the City’s coastal zone and therefore not subject to the Coastal Commission’s directive to analyze managed retreat”. While this may be true, the City’s vulnerability assessment shows portions of this area at risk for exposure to increased flooding as a result of sea level rise and the Commission recommends analyzing managed retreat city-wide because it is an important strategy to help ensure that development is safe and wetlands and other resources are protected. This concept is not only important on its own, but is emphasized in various statewide guidance including directives from the Governor, in the Ocean Protection Council’s State Sea-Level Rise Guidance, and in the California Adaptation Plan (Safeguarding California).

6 d. In Appendix C, the figures showing beach width over time in response to the different adaptation options indicates that beach width under a retreat scenario narrows at almost the same rate as with an armoring scenario, but that seems like an erroneous assumption. One of the objectives of a retreat scenario is to allow for natural shoreline processes, which should provide for beach migration (though the dynamics along rocky bluffs would be different than in low-lying beach areas). How was shoreline response to managed retreat modeled? There is currently no description provided in Appendix D.

3) *Armoring*: Overall, the City seems focused on using an armoring strategy, but the adaptation plan has not adequately described how the City will be able to protect coastal resources in conjunction with armoring. Portions of Section 4.1 state that a public access plan should be developed in concert with an armoring strategy, but there is no description of what such a plan might entail, and there is no information provided on how the City would be able to ensure public access is maintained or enhanced. Additionally, such plans seem to be presented as next steps. However, given that access is already reduced in many areas, including as a result of existing shoreline armoring, and impacts would only be exacerbated as sea levels rise, such plans should be developed now, and as armoring is repaired, expanded, and/or constructed going forward.

7 Separately, the adaptation plan should explain the regulatory requirements of the Coastal Act regarding shoreline protective devices, as well as any relevant permit history throughout the area. Assumptions regarding Caltrans continuing to protect Highway 1 in place and the City of San Francisco continuing to maintain the Sharp Park berm as is should be described in the context of other actions these stakeholders have taken regarding realignment, relocation, and protection of other assets, as well as existing coastal development permit condition requirements. For example, pursuant to CDP 2-17-0702 the Sharp Park Berm is only authorized for ten years and requires a five year review by the Coastal Commission to evaluate whether any changed circumstances have occurred that would potentially necessitate a change of the authorization term given the uncertainties of climate change, sea level rise and the volatile history of the Pacifica shoreline.

Lastly, please discuss the engineering and economic feasibility of an armoring approach over time, especially in light of challenges with designing and maintaining armoring in the Esplanade area due to the nature of the bluff geology present. Are there areas of the city where armoring would not be feasible in the near, middle and/or long term? At what point would armoring no longer provide the level of protection necessary to prevent damage from storms and or higher amounts of sea level rise?

8 4) *Beach Nourishment*: Overall, there is no discussion of the geotechnical feasibility of beach nourishment over time. In order to evaluate the use of nourishment as a strategy for ensuring the continued existence of a beach, particularly in concert with any type of armoring strategies, a technical analysis is critical. How long is nourishment likely to be effective given the particular wave dynamics and geomorphology at various locations throughout the City? Similarly, if effective, how often and at what scale are these areas likely to need nourishment? At what point would the costs of nourishment make it infeasible? At what point would the rate of sea level rise be too high for nourishment actions to take place? Answers to these types of questions are essential if the City plans to pursue an approach that

focuses on armoring and nourishment. At a minimum, these considerations should be qualitatively discussed.

Additionally, throughout the sub-area adaptation recommendations (starting on page 23), it is recommended that coarse sand or gravel be utilized because it would remain in place longer than finer sands. However, coarse sediment and gravel that is not comparable to area sand would likely result in significant environmental and recreational impacts, inconsistent with the Coastal Act. These Coastal Act requirements should be taken into consideration and described in the beach nourishment section.

5) *Cost Benefit Analysis*

- a. The cost-benefit analysis seems to assume a fixed cost for beach nourishment over time. However, the cost for sediment will likely increase over time as it becomes scarce. Given the focus on beach nourishment as a preferred adaptation strategy, the adaptation plan should thoroughly explain this assumption and how it relates to the overall analysis.
- b. Are any mitigation costs associated with seawalls (e.g. required mitigation for sand supply and recreational impacts) incorporated in the costs for the cost-benefit analysis? Discuss whether or not these are incorporated and how this may affect the overall costs.
- c. Pg. 60 states that accelerating sea level rise would indicate an exponential cost increase for armoring but that this added cost is ignored for simplicity. What is the scale of this potential cost? How might it factor into the overall analysis? This assumption needs to be explained more and should be highlighted as needed to ensure the reader is aware of it.
- d. Page 61 states that a cost factor of 2x was applied to account for demolition and replacement costs. Presumably these costs would generally not be the same, so how accurate is this assumption? In addition, the assumption that all structures would be rebuilt isn't necessarily accurate. These assumptions, and what they mean for the overall analysis, should be explained.
- e. Does the \$40/day beach recreation value account in any way for beach width? How is it actually factored into the analysis – does a narrowing beach result in a reduced recreational value? Does complete loss of beach result in complete loss of value?
- f. How does the recreational value of Sharp Park Golf Course actually get factored into the analysis? The Appendix seems to suggest that only the land value is accounted for – this should be described on page 65.
- g. What do the transaction costs (page 65 and elsewhere) actually include? Why do they only accrue for managed retreat alternatives?
- h. For the expected losses in property tax tables, the loss is significantly greater for the managed retreat alternatives. However, earlier in the report, the assumption is that structures would be demolished and rebuilt elsewhere which would suggest that the property tax would not be lost. Explain the assumptions used and why there are differences among these various cost factors.
- i. Please explain why armoring strategies show increasing recreational value over time for each of the cost-benefit analysis tables, despite the fact that beaches would most likely be lost as a result of armoring. Is it due to the assumption that beach recreation will increase

9 (Cont.)

(broadly) over time? Even if recreation increases generally, it is unlikely that recreation would increase in areas where beach area is significantly reduced or eliminated. Please update this analysis and/or explain these assumptions.

- j. For flooding impacts, are damage costs considered to be one-time costs? It is more likely that flood damage would happen repeatedly, more often, and to a greater degree as sea level rises if structures are not removed or protected. Relatedly, even the managed retreat alternatives show flood damage costs – what is being damaged in this alternative if structures are removed? The same question applies to Table 34 (regarding tidal flooding). Additionally, for the tidal flooding table, this section discusses groundwater concerns – in such a case, how would armoring or nourishment protect structures? Also, what other adaptation measures might be needed to address groundwater concerns? Please explain these assumptions and how they impact the overall analysis.

6) *Other Comments:*

- a. Section 4.1: Suggest moving this whole section, which amounts to the conclusions and recommendations, to the end of the document given that it is, presumably, based on the analysis presented in the later sections. Additionally, we suggest including a section that explains how individual strategies for each of the sub-areas would work together to address vulnerabilities for the City as a whole, and how the City would address both built and natural assets. This section should also discuss the types of strategies that could and should be used in all sub-areas, such as siting and designing new development to be safe from hazards.
- b. Pg. 19: The document states that because extreme flooding occurs infrequently, sea level rise may be realized before extreme flooding. This statement runs counter to what is the case in most areas, as the combination of even fairly routine storms riding on top of small increases in sea level are likely to cause damage earlier than higher amounts of sea level rise alone. Why would this not be the case in Pacifica?
- c. Pg. 20: Please provide more detail about Table 2. How were these stable beach widths and erosion offsets identified? What is the existing beach width/offset in these areas?
- d. Pg. 22 suggests that vulnerable public infrastructure be armored in the next 10 years, but later says that the adaptation plan includes contingency actions such as realignment if funding is unavailable for armoring. If relocation is an option as a contingency plan, why would it not be used as a primary means to ensure protection of this infrastructure?
- e. Pg. 31: Why are Prop 1A and Hazard Mitigation grant options not included in the table? We suggest also noting in the Table that, although State and Federal funding options vary over time, there are grant programs that support adaptation efforts (e.g. Coastal Commission, Coastal Conservancy, Ocean Protection Council, Caltrans, and NOAA grants).
- f. Pg. 33: This section recommends that a plan be developed to maintain and potentially enhance various habitats as a next step. The Coastal Act requires protection of these resources, and thus such a plan should not be a next step, but rather something that should be a required element of this adaptation plan.

10

10 (Cont.)

- g. Pg. 33: Separate the bullet for the Coastal Commission and the Coastal Conservancy. The Conservancy does not have “jurisdiction” over actions in the Coastal Zone, but rather is an important partner in habitat and access related projects along the coast.
- h. Pg. 34: The description of setbacks states that there will be a question in the future about whether structures that become vulnerable in time would be removed or protected. In current practice, new structures must be sited and designed to be safe over their anticipated lifetime without the need for shoreline protective devices, consistent with the Coastal Act, and would therefore be required to be removed or relocated if they ever become unsafe due to sea level rise.
- i. In the Table on page 40, why are setbacks not suitable for all sub-areas? Setbacks are fairly common for most development.
- j. In Appendix C, explain how long-term, historic erosion rates were established and discuss whether or not the ongoing presence of existing SPDs may have affected the assumed background erosion rate.

11

Again, thank you for the opportunity to comment. Coastal Commission staff continues to appreciate the City’s willingness to facilitate our involvement in the process of carrying out the grant requirements and updating the City’s LCP, and we are available to discuss these comments in further detail.

Sincerely,

Kelsey Ducklow

 FOR
LCP Grant Coordinator and Climate Change Analyst

Cc:

Patrick Foster, *Coastal Analyst, North Central Coast District*



Comment Form

City of Pacifica Sea Level Rise
Public Meeting
Saturday, June 23, 2018

Name: SUE ELDREDGE

Organization: RESIDENT

Email Address: [REDACTED]

- What comments or questions do you have about the suggested adaptation strategies for any of the sub-areas?

REMOVE ALL MANAGED RETREAT
FROM LCP.

AS AN ADAPTATION POLICY AT THIS POINT =
PREMATURE. PLAN WAS STATED IN THE PRESENTATION
SEVERAL TIMES ON "OBSERVABLE DATA" NOT
HIGH SLR PROGNOSTICATIONS.

- Do you foresee an issues with the suggested adaptation strategies for any of the subareas? Please explain.

1
① MANAGED RETREAT DEFINITELY AFFECTS
HOME OWNERS' PROPERTY VALUES + POTENTIAL
LOSS OF DOLLARS IN PROPERTY SALES W/
HAVING TO PROVIDE DISCLOSURE IF MFR
IS INCORPORATED INTO THE ADAPTATION
PLAN. AS WAS POINTED OUT THIS ALSO
IMPACTS A PROSPECTIVE BUYER'S ABILITY
TO GET A LOAN OR INS.
[over]



General Comments

1 (Cont.) OBVIOUSLY, LOTS OF WORK HAS GONE INTO THIS PROCESS. COST IS A HUGE FACTOR WHILE PROTECTION OF COAST LAND IS IMPORTANT. ... PROTECTION OF LIFE IS MORE IMPORTANT. PEOPLE WHO HAVE INVESTED IN PACIFICA + HAVE PLANNED TO LEAVE THEIR HOMES + PROPERTIES AS AN INHERITANCE.

Forms can be returned to staff tonight, emailed to sealevelrise@ci.pacifica.ca.us, or mailed to Bonny O'Connor, Assistant Planner at 170 Santa Maria Avenue, Pacifica, CA 94044. Comments will be accepted until 30 days after the release of final Draft Adaptation Plan.

Thank you for your input!



Comment Form

City of Pacifica Sea Level Rise
Public Meeting
Saturday, June 23, 2018

Name: Matthew Koester

Organization: Pacifican Climate Coalition

Email Address: [REDACTED]

- What comments or questions do you have about the suggested adaptation strategies for any of the sub-areas?

1
- I want the community to understand "mangal retreat".
- the community must understand that they will have to abandon properties no matter what happens. Erosion is a continual process, regardless of sea level rise projections. Mangal retreat is a mechanism for property owners to recover the value of their properties if they wait too long to sell.

- Do you foresee any issues with the suggested adaptation strategies for any of the subareas? Please explain.

2
1. Public Confusion the cost of adaptation measures on taxpayers, when this money may not necessarily be raised by Pacifica taxpayers but Fed/State instead.
3
2. I want the analysis to include the complete lifecycle of reventment measures - how long will armoring last? What are the costs by time spent?
4
3. More robust campaign about what "mangal retreat" means for the community

[over]



General Comments

5

- I want to acknowledge the proliferation of
out-of-town organizations in our community
i.e. realtor's associations. I worry about the
outside interests hurting our ability to make
informed decisions.

Forms can be returned to staff tonight, emailed to sealevelrise@ci.pacifica.ca.us, or mailed to
Bonny O'Connor, Assistant Planner at 170 Santa Maria Avenue, Pacifica, CA 94044. Comments
will be accepted until 30 days after the release of final Draft Adaptation Plan.

Thank you for your input!



Comment Form

**City of Pacifica Sea Level Rise
Public Meeting
Saturday, June 23, 2018**

Name: Tony Slade

Organization: _____

Email Address: _____

- What comments or questions do you have about the suggested adaptation strategies for any of the sub-areas?

- Do you foresee an issues with the suggested adaptation strategies for any of the subareas? Please explain.

Sharp Park Section 3.4 #2, Armor
 beach width was considered as the model
 for seawall replacement. However, "Estimated
 useful life" should also be considered,
 eg the estimated useful life of the
 "retaining wall" on the north end of the
 pier has been exceeded as estimated by

[over]



General Comments

1 (Cont.)

the original construction company
So this portion of the period should
not be considered equally on beach
width measurement with the south end,
ie. beach width.
Thus, beach width & estimated useful
life should be considered together as
a model for replacement schedules.

~~_____~~

Forms can be returned to staff tonight, emailed to sealevelrise@ci.pacifica.ca.us, or mailed to
Bonny O'Connor, Assistant Planner at 170 Santa Maria Avenue, Pacifica, CA 94044. Comments
will be accepted until 30 days after the release of final Draft Adaptation Plan.

Thank you for your input!



Comment Form

**City of Pacifica Sea Level Rise
Public Meeting
Saturday, June 23, 2018**

Name: Allison West

Organization: citizen

Email Address: [REDACTED]

- What comments or questions do you have about the suggested adaptation strategies for any of the sub-areas?

Why isn't the city considering using
undeveloped land in Pedro Point (eg Carlson field)
for mitigation in the strategies?

The Natural Resources Agency has
advised that wetlands can be extremely
effective in protecting from flooding.
It also has valuable habitat and hydrological
benefits

- Do you foresee any issues with the suggested adaptation strategies for any of the subareas? Please explain.

yes! See above. Also ...
1. the adaptation strategies for Pedro Point
are passive, essentially not looking into
more affirmative steps to manage growth
and development in the area.

2. We currently have flooding on San
Pedro Ave - the strategies should



General Comments

2 (cont.)

be coordinated w/those specific areas subject to current flooding

3

2. The city has no development plan in Pedro Point and development in any wetlands must be coordinated w/ strategies for SLR.

Forms can be returned to staff tonight, emailed to sealevelrise@ci.pacifica.ca.us, or mailed to Bonny O'Connor, Assistant Planner at 170 Santa Maria Avenue, Pacifica, CA 94044. Comments will be accepted until 30 days after the release of final Draft Adaptation Plan.

Thank you for your input!

O'Connor, Bonny

From: Sea Level Rise on behalf of SeaLevel Rise
Sent: Friday, July 06, 2018 9:35 AM
To: [REDACTED]
Subject: RE: Questions after 6/23/18 Sea-Level Rise public meeting

From: [REDACTED]
Sent: Wednesday, June 27, 2018 4:01 PM
To: Gibbs, Tina
Subject: Questions after 6/23/18 Sea-Level Rise public meeting

Hello,

There is a lot of concern around including language of managed retreat in the LCP.

1. Isn't an LCP necessary for eligibility for funding for community coastal protection?
 2. Are there truly risks to property values if an LCP includes "managed retreat" and "setbacks"?
 3. What are the consequences in NOT including "managed retreat" in the LCP?
 4. If managed retreat is not listed as an option, would funding for managed retreat be excluded if it ever proved necessary?
 5. What is the role of our city council in implementation of the LCP?
- Thank you.

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Natesan, Sanjana

From: amy <[REDACTED]>
Sent: Friday, July 06, 2018 5:43 PM
To: O'Connor, Bonny
Cc: John Keener, Pacifica City Council, Mayor
Subject: Fwd: Sea level rise comments, typo corrected

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

From: amy <[REDACTED]>
Date: Fri, Jul 6, 2018, 5:40 PM
Subject: Sea level rise comments
To: <o'connorb@ci.pacifica.ca.us>

1 What the city of Pacifica is failing to acknowledge is twofold. Number one is that sea level rise will be a small potatoes issue compared to all the other catastrophic aspects of climate change. The number one issue facing California and the world will be exponential heat and drought leading to the inability of crops to grow. Pacifica, San Mateo County and California must immediately plan for food and water security. Secondly, in terms of Pacifica's position in the Bay Area, if you look at the sea level rise risk maps from NOAA, you will see that the effects to Pacifica are quite minimal and the entire interior of the Bay Area including SFO airport, Silicon Valley, San Jose, and the East Bay plus cities in the North Bay, and Delta, strong economic engines for the Bay Area, will suffer the worst of drastic inundation. Pacifica must be realistic in terms of where funding is going to come from. The state of California will likely choose to spend money protecting San Francisco International Airport, Google and Facebook, San Jose Airport, freeways, and the ports in the East Bay, etc ... over our small and almost economically insignificant coastside community. I fully realize that the city of Pacifica and our community at whole is not willing to believe how severe climate change is actually going to be. We must start planning for food and water security. Nobody is going to die if they have to sell their house now and move to San Bruno or Walnut Creek. But everybody will die if we do not have adequate food and water. Amy Lynn Caplan, Manor Drive.

Click [here](#) to report this email as spam.

O'Connor, Bonny

From: amy <[REDACTED]@com>
Sent: Monday, July 09, 2018 10:44 AM
To: Sea Level Rise
Subject: Please incorporate this slide into any upcoming SLR meetings. This is the Bay Area at 6' of SLRise.
Attachments: sea level rise bay area 6.png

1 | Please incorporate this slide into any upcoming SLR meetings. This is the Bay Area at 6' of SLRise.
Perspective is important.
Amy Lynn Caplan
Manor Drive.

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SEA LEVEL RISE VIEWER

94044, Pacifica, CA, USA



WATER LEVEL

6ft

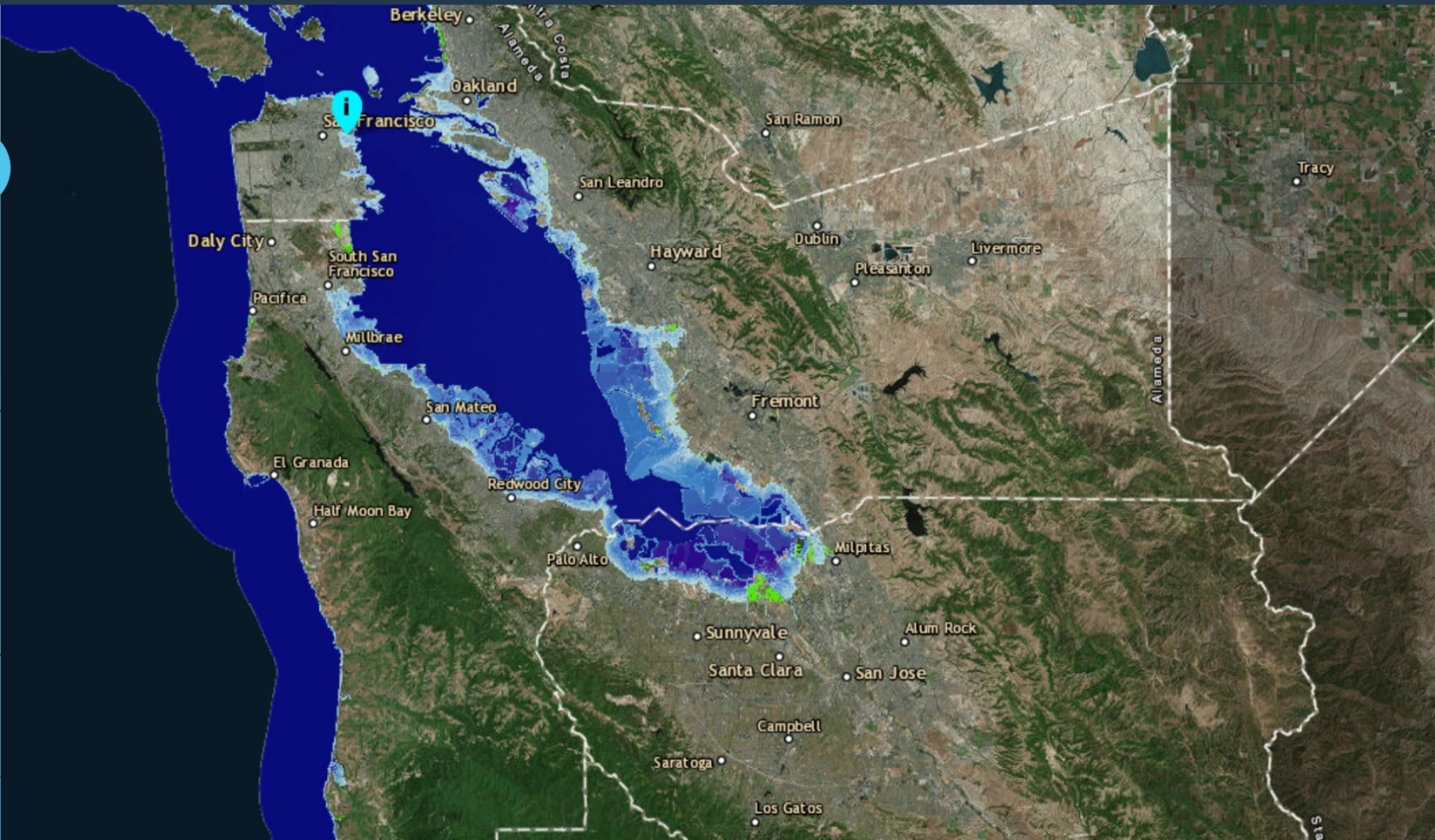
5ft

4ft

3ft

2ft

1ft



Sharp Park Restaurant and Pro Shop, Inc.
██████████ **Francisco Blvd.**
Pacifica, CA. 94044

July 21, 2018

Pacifica Planning Department
Lisa Wehrmeister, Planning Director
Pacifica City Manager Kevin Woodhouse
170 Santa Maria Ave.
Pacifica, CA. 94044

**Sharp Park Restaurant and Pro Shop Objects to Managed Retreat:
Failure to protect the golf course from the ocean
would mean loss of recreation and community to our customers, and
loss of employment and economic hardship for fifty employees.**

Dear Ms. Wehrmeister and Mr. Woodhouse,

I am the CEO of Sharp Park Restaurant and Pro Shop, the concessionaire at the San Francisco City-owned Sharp Park Golf Course. I believe that we are the largest private employer in the Sharp Park District of Pacifica, with 46 employees – 8 fulltime and 38 part-time, and an annual payroll over \$400,000. Most of our employees are Pacifica residents, and many of them are long-time employees of 25 years or more. San Francisco Rec & Park employs an additional 6 or 7 maintenance workers at the golf course – about half of whom are Pacifica residents.

Commented [RHH1]:

1

This is a Pacifica business, employing Pacifica residents, serving the social and recreational needs of Pacificans – men and women, seniors and school kids, of all races and social strata. Not only that, the golf course attracts a substantial number of visitors from San Francisco, San Mateo County, and the rest of the country and the world, who come to enjoy the beauty and classic architecture of Alister MacKenzie’s historic Sharp Park seaside links.

So we urge you, on behalf of ourselves, our customers, and our employees, to reject Managed Retreat, and to adopt adaption planning measures that will fully protect and preserve the Sharp Park Golf Course.

Very truly yours,

Mark Duane

Mark Duane, CEO
Sharp Park Restaurant and Pro Shop, Inc.

cc: Environmental Science Associates
San Francisco Recreation and Park Department
San Francisco Public Golf Alliance

O'Connor, Bonny

From: amy [REDACTED] >
Sent: Tuesday, July 31, 2018 7:25 PM
To: Sea Level Rise
Subject: Final Draft SLR Adaption

1 After the final draft sea level rise adaption plan is adopted, we must begin to talk about the more imminent risk of climate change such as hurricane force storms, fire, mudslides and landslides, excessive heat emergencies (and cooling centers), backup electricity generation, and food and water supply. We must also begin to discuss under grounding all overhead wires (climate change means more wind), updating our zoning to allow climate resistant building design (eg: concrete monolithic domes), and allowing homes to be more resource efficient such as using gray water, composting toilets, and requiring neighborhood "victory gardens."

Amy Caplan
Manor Drive.

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O'Connor, Bonny

From: Laurie Goldberg <[REDACTED]>
Sent: Wednesday, August 08, 2018 10:33 PM
To: Sea Level Rise
Subject: Sea level rise

Follow Up Flag: Follow up
Flag Status: Flagged

I have lived in Pacifica for 39 years. With Climate Change and sea level rise, we need to be as a city investing in managed retreat.

1 Armoring the coast is not the best way to save areas along the coast.

Also armoring the berm by the golf coarse is going to cause us to lose the sand and the beach. Do we really want this to happen?

I hope the city of Pacifica considers different alternatives and not just pleases the realtors.

Laurie Goldberg

Sent from my iPhone



Comment Form

City of Pacifica Sea Level Rise
Public Meeting
Saturday, August 11, 2018

Name: Pat Kromer

Organization: Sharp Park Resident

Email Address: [REDACTED]

- What comments or questions do you have about the suggested adaptation strategies for any of the sub-areas?

1

It is a dis-service to put dates on when the various scenarios of SLR rise will occur. We DO NOT KNOW the time course of what will happen in the future. Plans need to be based on events and frequency of events, these should then trigger actions. Plans to be adapted over time, but NOT with time predictions, and implemented

- Do you foresee an issues with the suggested adaptation strategies for any of the subareas? Please explain.

2

The cost-benefit analysis seems to be a case of the "tail wagging the dog" — a flawed technique is forcing us to plan using dates rather than adaptations based on conditions.



Comment Form

**City of Pacifica Sea Level Rise
Public Meeting
Saturday, August 11, 2018**

Name: MAT LANZER

Organization: SELF

Email Address: [REDACTED]

- What comments or questions do you have about the suggested adaptation strategies for any of the sub-areas?

1

RAISE TAXES, DON'T BOOT HOMEOWNERS.

- Do you foresee an issues with the suggested adaptation strategies for any of the subareas? Please explain.

2

WEST SHARP PARK Erosion zone should
account for seawall.

O'Connor, Bonny

From: John Murphy [REDACTED]
Sent: Saturday, August 11, 2018 1:27 PM
To: Sea Level Rise
Subject: Managed retreat

I think that preservation of the beaches, without adding rubble and blocking access for walkers and other users is very important.

1 I also think that public money can aid housing, but it should be for safe affordable housing, not to protect and shore up crumbling poorly sited beach front houses. We need a real plan that removes housing from the shoreline. We need to remove any rip rap already spoiling the beach, not add more.

We must accept the facts of sea level rise and deal with it.

John Murphy

Sent from my iPad users



Comment Form

**City of Pacifica Sea Level Rise
Public Meeting
Saturday, August 11, 2018**

Name: Roy Stotts

Organization: _____

Email Address: _____

- What comments or questions do you have about the suggested adaptation strategies for any of the sub-areas?

All of the suggestions have merit EXCEPT the idea of managed Retreat. It is far too early to make decisions that might inhibit coastal homeowners from obtaining permits for roof repairs, etc. We are not required to have this written in our LCP, and it should be stricken completely (reference to managed Retreat) from our final LCP.

- Do you foresee any issues with the suggested adaptation strategies for any of the subareas? Please explain.

There will be significant repercussions if the final plan includes managed Retreat. Most of Pacifica west of Highway One will be at risk and we will be at the mercy of the California Coastal Commission if such language is included in the final LCP.



Comment Form

**City of Pacifica Sea Level Rise
Public Meeting
Saturday, August 11, 2018**

Name: Allison West

Organization: resident

Email Address: [REDACTED]

- What comments or questions do you have about the suggested adaptation strategies for any of the sub-areas?

1 Significant concerns about the lack strategy to utilize undeveloped land like The Calson Field on Pedro Point to mitigate storm ~~surge~~ surge. That land is often under water in rainy season + other times + is federally designated wetlands. It should remain^{as} commercial recreation zoning. This strategy is outlined in CA State Governor's recommendation on climate change.

- Do you foresee an issues with the suggested adaptation strategies for any of the subareas? Please explain.

No ~~area~~ formal plan for development in Pedro point! We currently experience flooding. There is no plan for ~~build~~ growth and this must be taken into account. Where will water go (surge, rainwater) if these issues not taken into account.

Coastal Commission recommends managed retreat! →

[over]



General Comments

Calson Field must remain zoned as IS and the and commercial bldg that could be approved must be rejected.

1 (Cont.)

Managed retreat is an option - why keep avoiding it?

Please don't do a ~~to~~ one size fits all - managed retreat is more affordable & will be effective in certain areas.

Forms can be returned to staff tonight, emailed to sealevelrise@ci.pacifica.ca.us, or mailed to Bonny O'Connor, Associate Planner at 170 Santa Maria Avenue, Pacifica, CA 94044. Comments will be accepted until August 29 at 5:00pm.

Thank you for your input!

O'Connor, Bonny

From: Julie Thomas [REDACTED] >
Sent: Sunday, August 12, 2018 5:24 PM
To: Sea Level Rise
Subject: Managed Retreat

Why is SAMCAR deciding what Pacifica needs to do? They may be one of the largest, richest and most powerful realtor organizations in the country, but why should realtors who are only interested in making the highest commissions possible have a say in Pacifica's future? Not long ago, taxpayers paid over \$700,000 to demolish a building on the ocean cliffs. The realtor had made the commission ages ago and the property owner refused to take responsibility so it was left to the taxpayers. I have read that SAMCAR and other realtor organizations lobby to stop research on climate change and coastal issues so that they can collect high commissions on beautiful coastal properties and leave the problems to the tax payers.

1 Only 12% of the properties in Pacifica are in the coastal zone and many probably are already impacted by coastal problems. Drone footage shows buildings hanging over cliffs now. Those buildings should never have been approved, but realtors want more buildings on unstable areas built.

It is crucial that environmentally sound, science-based research be used to determine the best course of action, not greed-based lobbying. Other cities are trying to bring back wetlands and similar natural solutions because armoring often fails and guarantees the loss of our beaches.

Thank you,
JM Thomas
[REDACTED] Piedmont Ave
Pacifica, Ca

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O'Connor, Bonny

From: D Gold [REDACTED] >
Sent: Wednesday, August 15, 2018 2:57 PM
To: Sea Level Rise
Subject: Draft Adaptation Plan

I regret that I have been unable to attend the community meetings on the Draft Adaptation Plan, which I think is very important to our city's future.

I believe that managed retreat needs to be included in the Local Coastal Plan. We need to plan for when the combination of coastal erosion and sea level rise endangers critical infrastructure, such as the wastewater system. Pumping stations and other pipes will need to be relocated, and this planning and construction needs to start now.

1 Homes and other structures located along the coast are already endangered. As a city, we should not build additional structures within the zones that are projected to be impacted by sea level rise. The City could pass zoning restrictions that prevent new construction. If that is not done, and a property owner or developer chooses to build within these zones, they must assume liability for the impact of sea level rise. Additionally, Pacifica should enact a required disclosure notification regarding these properties, similar to disclosures currently required for flood plains, so that future buyers will be appropriately warned.

"Armoring" the coast is an expensive strategy that will either fail, or will impact other areas along the coast by changing water patterns. We should not encourage this strategy.

Thank you for your attention.

Deborah Gold

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O'Connor, Bonny

From: Bridget Mckenna [REDACTED]
Sent: Thursday, August 16, 2018 5:16 PM
To: Sea Level Rise
Cc: Sue Digre (Contact); [REDACTED] [REDACTED]@pacificatribune.com
Subject: Asking questions during a public presentation

I am writing most specifically to complain about the policy of not allowing questions during the presentation. Saving questions til the end is a preposterous idea and does not lend itself to informing or engaging the public. It does not help to clarify anything. The ability to ask questions and receive answers to those questions is an essential element of a free press, journalism, and freedom of speech.

As curiosities arise, with charts and graphs before our eyes, is when it is best to ask a question, and at no other time is it appropriate.

This is a basic point which I would be glad to hear anyone argue with, and which I expect can be easily rectified.

1 First thing I was shhhhhhed up about-

A man at the mike claimed that there has been no significant sea level rise here in Pacifica or along the west coast in general.

Is this true?

It is, apparently. The next question should be how is the rising oceans effecting our coast, but that question is not being asked.

This same man was suggesting building a many millions of dollars worth of sea wall just the same.

Second question:

If you don't believe the ocean is rising, why build a wall at all?

2 3. As per the projections for the cost of a managed retreat- which means approach each problem as we encounter it in the most thoughtful, sustainable manner possible- how is it that the property tax losses continue to grow through time, if the plan is to relocate people and businesses to new locations within Pacifica? As a matter of fact why should there be a property tax loss at all?

3 4. Our natural resources, the beaches, and open spaces have a monetary and quality of life value that is not being figured into these equations? Why wouldn't they be?

Some ideas I heard while asking my questions in private:

12 rounds of golf anyone?

A marvelous win/win situation -let the lagoon do its thing, it will not flood the entire area, and shorten the golf course to 12 holes, the 13th hole is a lot closer than the 19th!! Everybody wins.

4 These lectures are simply a process to form an adaptation to our already existing Local Coastal Plan. Jousting elements in our community, from both sides of the fence, seem intent on using this issue to further divide this community politically, (in my opinion a form of elections tampering that we the people are capable of changing by simply rejecting the divisiveness itself)

There has never been a time in US history when overcoming our differences was more important. Not only is our very democracy on the line but the global climate, as well. It is time to put our big kid pants on, roll up our sleeves, and put a plan together for our city that will be sustainable and prosperous, for us all, and the planet too.

Sowers of hate and dissension are the real enemy of the people, no matter what outward appearance they may take, or what side they claim to be on.

Peace

Sent from my iPad

COMMENTS ON THE SLR ADAPTATION PLAN - FINAL DRAFT

This is not so much comments on the ESA plan itself as a general statement on the City's overall SLR adaptation process.

Drawbacks of Structures.

Although all hard structures have relatively modest maintenance costs under optimum conditions, they are complex and expensive to build, and they rarely function as intended. They interfere with the natural, active littoral transport system and more often than not cause unintended, undesirable erosion and deposition. Hard structures protect the property of only a few people at the expense of many, for such projects are normally funded at least partially with tax money. Costs and concerns must be factored in before building begins.

Source: Science and Issues, Water Encyclopedia

1 Our town is already bound up with 'hard structures' in a futile effort to ward off natural erosion. Just take a walk on any of our beaches. Rock revetment and seawalls are everywhere and have already eliminated most of the sand from our beaches on the north end of town. By building a town near bluffs composed of erodible sandstone, it is washing away. The normal oceanic forces, erosion, tidal action and storm surge are inexorably moving our coastline eastward. We have responded the way most beach towns and cities do throughout the world, we threw up hardened barriers. How has that worked? We now have skimpy little nothing beaches north of the Sharp Park pier almost to the Daly City line and still houses and apartment buildings are falling into the sea. And this is all *before* climate-change driven sea level (SLR) rise has really kicked in.

So now we are faced with a problem. How to fold a response to this phenomena into our municipal planning guidelines, that is how to update our Local Coastal Plan (LCP) to mitigate the worst of 'climate change' driven SLR looms. This is a problem all coastal communities all over the world. must eventually face How to adapt?

In March of this year the City Council in approving preparation of a SLR Adaption Plan to guide the updating of our present LCP, agreed upon a set of laudatory goals. My reflections on these goals are as follows:

Bolster efficacy of public safety efforts.

Public safety of course should lead this list of objectives. With eroding sandstone bluffs and structures on the brink of falling into the ocean regularly each winter, preventing a lethal collapse must be paramount. But also there is public safety concerns regarding critical infrastructure such as storm drains and sewer lines running below streets that are immediately adjacent to the coastline This is undeniably also a public safety issue. Sudden storm damage to a sewer line resulting in backup would be a major health issue. Hard structure protection has already failed and endangered pipelines under Beach Blvd when the seawall there failed due to a high tides-storm surge event. SLR will no doubt provide similar and probably more serious such events. Studies should be conducted to determine the cost and benefit of relocation such infrastructure out of harms way. That may make the most sense in the long run.

Respond to Climate Change.

Revising policies and improving adaptive SLR response capabilities and then incorporating them into our revised LCP will be a major undertaking. Getting the language right that allows the Planning Department enough latitude and range of action is crucial. The LCP needs to have a broad range of tools to encourage and if necessary require home and business owners to rationally adapt to circumstance the seriousness and extent of which is still unknown. The City must not be hamstrung due to a lack of options built into the LCP. We simply do not know what we might face. Considering moving development away from the edge is crucial as our coastline is already eroding at 1-2 ft a year even with our (haphazard) attempts at armoring, and SLR is still yet to occur.

Preserve existing neighborhoods and promote environmental justice and local economic vitality

The updated LCP SLR adaptation policies must to the extent possible incorporate these three somewhat conflicting aspirations – 'neighborhood preservation', 'environmental justice' and 'economic vitality'. The heart and soul of this town is in the 'coastal zone'. Without it Pacifica would have no identity, no core. Yet this very zone is under threat of geological destruction from SLR under the worse case scenarios. As climate change daily becomes evermore undeniable we must acknowledge that we have crossed the Rubicon into a new more dangerous new world. New realistic approaches must be considered.

The seven sub-areas as defined in the draft ESA SLR Adaptation Plan each have a different set of vulnerabilities. Some include shoreline homes at risk, some have apartment buildings, hotels and businesses, some have popular beaches, some have all the above - and some have almost none. In any case no one wants their neighborhood or business ruined by arbitrary City policy. That is why the LCP must contain flexibility. Barring future options such as encouraging adaptation (like putting structures on pilings), or relocation of assets, or limiting new development in the dangers zones makes no sense. We don't know what we will face. Why tie our hands? We cannot lock into place a simplistic reactive policy of responding to encroaching seas with evermore armoring - seawalls, rocks piles and berms endlessly dumping in more sand (expensively transported from where?). It is too limiting and it has not worked in the past. Anyway the 88% of homeowners who do not live in the 'coastal zone' will eventually refuse to pay the cost. Besides the City may have long since gone into bankruptcy.

Preserve and enhance coastal access

In beach towns *coastal access* is the lifeblood of the town especially to their more popular beaches. Bluff collapse here has often temporarily eliminated safe access at least - at the north end of town (the Lands End/Oceanair ramp has just recently been returned to service). But the real issue is the health and well being of the beach itself. We have done a pretty poor job in that regard. It's pretty obvious that where revetment exists beach, more often then not the each is gone. Much has been published about this problem which is global. Revetment is the knee jerk reaction to natural beach erosion everywhere to protect structures that were originally built in the wrong place.

The entire north end of town from the Sharp Park Pier to the Lands End/Oceanair ramp has precious little beach - that is sand left. If we are going to continue to rely on armoring this situation will continue. To remedy this the ESA Adaptation Plan prescribes 100 ft sand nourishment to either reestablish lost beaches (north end) or retain beaches (south end like

Linda Mar Beach). This may work for awhile but it will be an expensive and endless process. We must build into our LCP a a solid Plan B to implement when this becomes too costly and proves to be futile.

Summary

Essentially the choice is simple. More seawalls or a visionary plan to slowly redesign the town to slowly move inland so as to work *with* not *against* the impersonal forces of nature now amplified by industrial civilization's disruption of our entire planet's climate.

The final draft of the SLR Adaptation Plan contains a much anticipated cost/benefit analysis of the three options (Protect /Protect-Accommodate /Retreat). It was interesting to see the various options in terms of actual costs laid out in black and white in the final report. Managed retreat was the clear winner being the least expensive option in 6 out of 7 subareas. Cost/benefit analysis showed only one subarea West Edgemar/Pacific Manor not having 'managed retreat' as the least costly option.

The homeowners nearest the beach and in the zones that are endangered (see red line in the ESA Vulnerability Assessment) are the ones who will lose property value as the SLR advances and the City can no longer afford to protect them with endless revetment and sand replacement projects'. Some endangered coastal zone homes are behind City maintained infrastructure (Esplanade and Beach Blvd) so they are safe as long as the City chooses to maintain rather than relocate infrastructure. At this point help with funding for revetment is still available (or at least has been) from external sources. But if SLR becomes as serious' problem as expected it will impact the entire coastline of the entire state including SF Bay facing areas. Money for more Pacifica's revetment will eventually become unavailable. It will go to higher priorities (like protecting SFO and all San Mateo's swarm of billion dollar IT businesses).

It makes sense for the revised LCP to be so written as to keep all options open. We simply do not know how bad SLR will be. If in future years the rate of erosion increases as predicted, the owners of each successive set of structures closest to the ocean will be faced with never ending costs for maintenance of their revetment. By the way how has that worked so far? And the City will be faced with never ending bills for revetment to protect their endangered infrastructure (along with the structures behind it). Those owners not behind City maintained infrastructure might consider forming some kind of 'special assessment district' with the extra money going into a common fund to be used as needed. In any case LCP with flexibility is imperative as we do not know what the future holds.

Finally I want to commend the Pacific Planning Department's work on this important issue and their choice of ESA as a consultant. The basic information as provided by this study seems to me to be valid, useful and based on solid science. So let's move on. Instead of squabbling over terminology as it relates to possible necessary strategies, let's save our energy for designing a solid, adaptable, progressive and visionary updated LCP.

Victor Carmichael

■■■■ Palmetto Ave ■■■■
Pacifica, CA

August 20, 2018

1 (Cont.)

O'Connor, Bonny

From: Richards, Michael <[REDACTED]>
Sent: Wednesday, August 22, 2018 11:20 AM
To: Sea Level Rise
Subject: Resident comment

To whom it may concern,

On 8/11/2018 I attended the Pacifica meeting discussing SLR and it was by chance that the only reason I heard about the meeting was because of Samcar who happened to leave a flyer on my doorstep. I currently live in the Linda Mar floor Zone and am a lifelong born and raised Pacifica resident. I just happen to live in one of the areas that was discussed in the meeting which is a part of the Pacifica SLR Plan. I felt unfortunate that the City of Pacifica has not informed the public better about their meetings and the scientific studies regarding the effect of SLR more efficiently to the community as a whole. Since the studies have been going on since 2009 this is the first time I have heard anything about the effect that it may have on Pacifica residents and the community. This is such an important topic that not only can affect the residents of Pacifica you would think that the electives that represent the city would have been more diligent in educating the public of what is happening, (not everyone reads the Pacifica Tribune). Samcar seemed to have a better campaign method than the city did and they were not even represented in the 8/11/2018 meeting but there message was heard by all. You can call it scare tactics or whatever you want but it is disappointing that our own elected city representatives have not done a better job of getting this message out. Since I was born and raised here all of my life I can say that I love my town and all of the environmental beauty and recreational benefits it provides to its residents and out of towners. The fact that I live in the Linda Mar flood plain and own my home causes me great concern since the last meeting has only better educated me and brought me closer to the actually seeing what the consequences of final SLR draft Plan will have on me and my fellow Pacifican's. I can appreciate that the fact that the California Coastal Commission required that Managed Retreat be part of the study if they were going to fund these studies, but that does not mean that Managed Retreat should be implemented as part of the final draft plan, (only reviewed as an option). I do not believe that any one environmental organization can conclude or predict the long term effects of SLR. You would not just accept one estimate from only one contractor if you were going to have major work completed on your home, would you? I do believe in global warming and that it can effect SLR, but no one can confirm what the future is going to bring in the next 20-50 years. I am afraid that if Managed Retreat is included as part of the final draft plan that this will be the end of no return for the residents that live in the affected areas. Not only will home prices will plummet, the residents that live in the affected areas may not have the choice of the first two options of the proposed SLR plan since managed retreat will be the most economical choice for the city to approve. **I cannot believe that the 6th largest economy in the world, "CALIFORNIA" would let one of its greatest coastal treasures, "PACIFICA" be washed away by coastal erosion and SLR.** I always pay my taxes and never complain about school taxes, fire assessment taxes, water taxes, etc. but I always pay for them. I see long term bond measures that are voted for that cost more than the 400 million dollar estimate that it would cost to shore up our beaches and protect our homes. Is Pacifica not worth the cost of implementing these choices as the first option prior to managed retreat? I believe that the first of the two options should be submitted as part of the final draft plan and let's see what the results are prior to including managed retreat as part of the final draft. Managed Retreat should only be considered as part of the final draft plan when all else has failed and should not be implemented as part of the final draft plan because it is the easiest way out. I as a homeowner am willing to take my chances for the next 10-20 years to see if beach shoring can be a solution and I would pay for any bond measures or taxes that were implemented to protect our city and my home from SLR.

Sincerely,

Michael Richards
Lifelong Pacifica Resident

O'Connor, Bonny

From: Gregor Blackburn <[REDACTED]>
Sent: Saturday, August 25, 2018 2:25 PM
To: Sea Level Rise
Subject: Comments RE: Sea Level Rise

Good day. I have a couple of comments caveats.

Caveat: I am a member of the Emergency Preparedness and Safety Commission. I also am a Certified Floodplain Manager and I work for FEMA as the branch chief of the Floodplain Management & Insurance Branch. Finally, I am making these comments as a citizen of Pacifica since 1992

Comments: Sea Level Rise is Real and it is Here Now MANAGED RETREAT A lot has been said about Managed Retreat. Editorial comments from the Pacifica Tribune have been negative towards MR, and advocating to keeping MR off of the SLR plan.

My push back to comments like this is:

- 1) any effective Plan must include All Options. To not even consider an option prematurely is bad planning.
- 2) we have seen what UnManaged Retreat looks like: Esplanade Ave. e.g.
- 3) if we fail to plan we plan for failure
- 4) ignoring the option is folly. We should examine the pros and cons of MR. if the community decides to chose a different path...that is fine.

My personal feelings about how the Trib is covering this element fo the debate are immaterial. What is important to the debate is providing a reasoned rebuttal of Mr. Sherman's editorials on the subject (which, quite frankly appeal to emotional reactions, not facts, and offer 'more heat than light', as the saying goes.

INFRASTRUCTURE PROJECTS

Costs:

Projects will be the result of discussions of the issues and solutions. Whatever the project's are likely to be expensive and beyond normal City CAP budget.

There are Grant options available to the City.

—FEMA has two grant programs that can help. Grants are to Mitigate hazard,

- 1) — Pre-Disaster Mitigation (PDM) is competitive based — Nationwide, and has a Nationwide budget.
- 2) —Post-disaster Hazard Mitigation Grant Program (HMGP) is granted to each state upon a Presidential Disaster declaration. Funding depends upon size of Disaster costs.

More information about the details upon request. But for both grants, what is Primarily Important is to have a Plan, with potential Projects.

I look forward to talking with you.

Sent from my iPad

O'Connor, Bonny

From: Dr. Jeffrey Bruno <[REDACTED]>
Sent: Sunday, August 26, 2018 5:18 PM
To: Sea Level Rise
Subject: Feedback on Sea Level Rise

Because large scale sea level rise will most likely take place over decades and centuries, it makes sense to take gradual steps. First identify those areas where storm damage already occurs and routinely requires public funds to maintain or clean-up. These areas ought to be the first targets for testing sea level rise barriers. For example, in Sharp Park crews routinely put sand back on the beach or haul away sand after big storms. Why not start to create a dune environment, within the confines of the designated park area? It might require some low level walls near the road and more plants to hold sand back.

1 Additionally, the idea of protecting entire zones or community areas is important, rather than a lot of people thinking only nearest to the ocean are at risk. For example, in Sharp Park the properties nearest to the ocean are a few feet higher than properties further away from the ocean. Since water seeks its own level, Seven Eleven and the underpass below Highway 1, will likely be flooded worst with storm surge than the properties nearest the beach, in that particular area. To simply patch a sea wall, but not address an entire line of defense, allows the water to pour through in other areas. Our ocean defense is only as good as the lowest lying areas.

Finally, the hundreds of millions of dollars in real estate and public infrastructure that needs protection - which may require tens of millions of dollars to shore up - will likely be offset by tax returns and commercial activities. The benefits of preserving our living and working habitats needs to be highlighted as well as identifying the scary costs.

Jeffrey J. Bruno, Ph.D.
Pacific Psychological Care
& Sensory Learning Center
www.childwisdom.org

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To: Pacifica Mayor Pacifica City Council Pacifica City Manager	From: Jeff Guillet Seaside Dr. Pacifica, CA 94044
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August 20, 2018

The residents of Fairway Park West strongly object to the ESA map that includes Fairway Park West with the Sharp Park sub-area.

Fairway Park West is much further from the sea and includes many topographic features that put it at little risk for sea level rise. Including our neighborhood in this proposed managed retreat sub-area will unfairly affect our property values, unnecessarily increase costs for insurance, and restrict our ability to improve our properties.



Figure 1

The Fairway Park West neighborhood consists of 173 single-family homes, 7 duplex units, and the Moose Lodge.

1. The Fairway Park West neighborhood:
 - a. Elevation ranges from 5 m (16.4 ft) to 24 m (78.7 ft) above sea level – that's 5.5-26.2 times higher than the 3 ft sea level rise predicted for the year 2100.
 - b. The nearest home is 332 m (1089 ft, or 0.21 miles) from the back side of the SPGC berm, and a total of 424 m (0.26 miles) from the ocean water line. The berm itself is 8 m, or 25 ft wide, and has a 10 m wide rock revetment across the ocean-facing section. The elevation of the berm is 9 m (29.5 ft) above sea level.

- c. The beach in front of Fairway Park West is 91 m (298 ft) wide, the widest beach of all sub-area 4.



1 (Cont.)

Figure 2

2. This policy recommendation document is about sea level rise, which is not applicable for our neighborhood.
3. Page 25 – The overtopping, structural failure, and breaching examples listed in the doc refer to Beach Blvd, north of the pier (pg. 25). There are no incidents of overtopping or structural failures south of Clarendon (1,001 m, or 3,284 ft, 0.62 miles) away to the north.
4. Page 26 – *Armoring* – The statement that “Existing property and infrastructure is at risk to coastal erosion so actions should be taken soon” applies to the area north of Clarendon, not West Fairway Park.
5. Page 27 – The 2060-2070 recommendation to construct a West Fairway Park stormwater basin, pump station, and interior SPGC levee refer to potential fluvial (rainfall) flooding. This is not sea level rise and has no place in this report. Even so, this would be the responsibility of SPGC (San Francisco), not Pacifica.
6. Page 27 – *Managed Retreat/Realignment* – refers to homes and structures along Beach Blvd, as it does not apply to West Fairway Park neighborhood.
7. Page 48 – *Sharp Park, West Fairway Park and Mori Point* – states that the entire sub-area “is low enough such that assets and property are subject to wave run-up and overtopping under existing conditions.” This is simply not true south of the pier, and especially at West Fairway Park due its distance from the sea.
8. Page 75 – *Sharp Park, West Fairway Park and Mori Point* – recommends Alternative 3, managed retreat, for the entire sub-area even though the at-risk area is north of Clarendon. It states, “The City would need to plan for the loss of residences in the community.” This does not apply to Fairway Park West, since this neighborhood is not at risk for sea-level rise.

9. There have been no reports of flooding in Fairway Park West.
10. Managed Retreat means:
 - a. We may be required to carry unnecessary flood insurance.
 - b. Property values will be affected immediately.
 - c. Restrictions on property improvements.
 - d. Significant tax losses to Pacifica, which are not included in this report (page 76).
11. Managed Retreat has been added to this document only at the direction of the CA Coastal Commission.

Based on the unnecessary lower property values and costs associated with a Managed Retreat designation, the residents of Fairway Park West propose and respectfully request that the Fairway Park West be defined as a separate sub-area from the Sharp Park area over 0.6 miles away. This must be done before the next policy meeting on September 10, 2018. Fairway Park West has significantly more beach and land between it and the sea and is at little risk of the effects of sea level rise. Doing so would also be inline with the City Council's adopted goal to Preserve Existing Neighborhoods and Promote Environmental Justice and Local Economic Vitality.

We propose that the existing Sharp Park, West Fairway Park and Mori Point Sub-area be divided up into two or three separate areas due to their vastly different topologies and terrain features.

1 (Cont.)



Figure 3 – Current Sub-Area



Figure 4 – Option 1: Separating Sharp Park from SPGC and Fairway Park West



Figure 5 – Option 2: Separating Sharp Park, SPGC, and Fairway Park West

The neighbors of Fairway Park West, our friends and supporters at the Moose Lodge, and the full extent of our social reach intend to make sure that those council members who don't act to remove our neighborhood from Managed Retreat will see their last term in November.

1 (Cont.)

O'Connor, Bonny

From: Jay Crawford [REDACTED]
Sent: Monday, August 27, 2018 11:37 PM
To: Sea Level Rise
Subject: A Compromise Wording

1 Managed Retreat seems to be scaring people and, possibly with good reason. Some of the areas really don't seem to need to be designated for managed retreat. Fairway Park West for example is 16' above sea level and 1/4 mile + from the ocean. How about this. I understand that Managed Retreat is the 3rd option. How about saying that the first option is armoring, the second is beach nourishment and managed retreat is being studied as a possible 3rd? That gives us some breathing room for people to take a more calm look at the problem. As I understand it the issue of sea level rise won't be critical for decades so we could say that the study of the Managed Retreat options has a schedule of 5 years or something like that before it is accepted as an option or rejected.

Jay Crawford
[REDACTED] Seaside Dr.
Pacifica, Ca.

O'Connor, Bonny

From: Redfield, Chris [REDACTED]
Sent: Wednesday, August 29, 2018 8:00 AM
To: Sea Level Rise
Subject: Managed Retreat

1 While it is foolish to deny SLR, it is also foolish to not put measures in place to mitigate it. That does not mean TURN AND RUN ! Managed Retreat absolutely does not need to be included in Pacifica's LCP at this time. The LCP has not been updated in 30 years ! I think we can wait !!! It can be added at ANY time down the road IF conditions warrant it, and everyone knows that. The CCC is force feeding CC this agenda and our ,so called, Mayor is obviously taking their recommendation hook ,line and sinker. ALL property owners and business owners will suffer with this "anchor" label around their necks.

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Petition for Removal of Managed Retreat Option for the Fairway Park West Neighborhood

We, the undersigned, reject Alternative Adaptation 3, Managed Retreat/Relocation, as an option for our neighborhood. It should not apply for the following reasons.

1. The elevation ranges from 5 m (16.4 ft) to 24 m (78.7 ft) above sea level – that's 5.5-26.2 times higher than the 3 ft sea level rise predicted for the year 2100.
2. The nearest home is 332 m (1089 ft, or 0.21 miles) from the back side of the SPGC berm, and a total of 424 m (0.26 miles) from the ocean water line. The berm itself is 8 m, or 25 ft wide, and has a 10 m wide rock revetment across the ocean-facing section. The elevation of the berm is 9 m (29.5 ft) above sea level.
3. The beach in front of Fairway Park West is 91 m (298 ft) wide, the widest beach of all sub-area four.

1 Fairway Park West is separated from Sharp Park by the Sharp Park Golf Course and berm, both of which are owned and maintained by the city and county of San Francisco, and is surrounded to the south by GGNRA land. This makes the sub-area really four distinct sub-areas – Sharp Park, the Sharp Park Golf Course and berm (SF), the Fairway Park West neighborhood, and Mori Point (owned and managed by the federal GGNRA).

Managed Retreat will decrease our property values, restrict our ability to make property improvements, may cause us to buy unnecessary flood insurance, and will take property tax dollars away from the city budget. Managed Retreat is not right for Fairway Park West and it's not right for Pacifica.

We know that currently several members of the Pacifica city council favor the California Coastal Commission's direction to include Managed Retreat in the Local Coastal Program, but equating the Fairway Park West neighborhood to the damaged section of Beach Blvd. north of the pier is wrong.

The neighbors of Fairway Park West, our friends and supporters at the Moose Lodge (also in the Fairway Park neighborhood), and the full extent of our social reach intend to make sure that those council members who don't act to remove our neighborhood from Managed Retreat will see their last term in November.

Signed,

[141 petition signatures attached below]

Petition to remove the Managed Retreat as an option for the City of Pacifica

Printed Name	Signature	Street Address	Phone/Email
JENNIFER KRALJEVICH		████ SEASIDE DRIVE 94044 jennif	████████████████████
PAOLO VESCIA		████ Seaside Dr.	████████████████████
Paula Loveseth		████ Seaside Dr.	████████████████████
Jenette Loveseth		████ Seaside Dr.	████████████████████
Jim Kimball		████ Seaside Dr.	████████████████████
Debbie Kimball		████ Seaside Dr.	████████████████████
Austin Kimball		████ Seaside Dr.	████████████████████
Maureen Geneste		████ Seaside Dr.	████████████████████
Ryan Legallet		████ Seaside Dr.	████████████████████
Brielle Miller		████ Seaside Dr.	████████████████████
Jay Crawford		████ Seaside	████████████████████

Petition to remove the Managed Retreat as an option for the City of Pacifica

Printed Name	Signature	Street Address	Phone/Email
Ramon Christopher Rodriguez	<i>Ramon Rodriguez</i>	████ Seaside Dr	[Redacted]
Ryan Grimm	<i>Ryan Grimm</i>	████ Seaside Dr	
Karin Staffin	<i>Karin Staffin</i>	████ Seaside Dr	
CHARMIN DUNN	<i>Charmin Dunn</i>	████ Seaside Dr	
Paul Geneste	<i>Paul Geneste</i>	████ Seaside	
Jason Geneste	<i>Jason Geneste</i>	████ Seaside Dr.	
Jonathan Geneste	<i>Jonathan Geneste</i>	████ Seaside Dr.	
JOHN HOLTZ	<i>John Holtz</i>	████ SEASIDE DR	
CAROL HOLTZ	<i>Carol Holtz</i>	████ SEASIDE DR	
LEON SLICK	<i>Leon Slick</i>	████ SEASIDE DR	
SANDRA SLICK	<i>Sandra Slick</i>	████ Seaside Dr	

Petition to remove the Managed Retreat option for the Fairway Park West neighborhood.

Printed Name	Signature	Street Address	Phone/Email
Tim Cissna	[Signature]	[Redacted] Seaside Dr	[Redacted]
Debbie Durham	[Signature]	[Redacted]	[Redacted]
Enza Bize	[Signature]	[Redacted] Seaside Dr.	[Redacted]
Michael Durk	[Signature]	[Redacted] Redwood Way	[Redacted]
Jim Zogh	[Signature]	[Redacted] Marina Way	[Redacted]
Shirley Lorenz	[Signature]	[Redacted] Marina Way	[Redacted]
Julie Ulmer	[Signature]	[Redacted] Seaside Dr.	[Redacted]
Len Stone	[Signature]	[Redacted] Seaside Dr.	[Redacted]
Alison Carroll	[Signature]	[Redacted] Seaside Dr.	[Redacted]
Marissa Wat	[Signature]	[Redacted] Bradford Way	[Redacted]
Maximilian Bionacci	[Signature]	[Redacted] Seaside Dr.	[Redacted]
Nick Burger	[Signature]	[Redacted] Bradford Way	[Redacted]
Mark Finucane	[Signature]	[Redacted] Seaside Dr.	[Redacted]
Jayne Finucane	[Signature]	[Redacted] Seaside Dr.	[Redacted]
Abby Dale	[Signature]	[Redacted] Greenway Dr	[Redacted]
Chris James	[Signature]	[Redacted] Seaside Dr.	[Redacted]
Michelle Gray	[Signature]	[Redacted] Seaside Dr.	[Redacted]
David Hinds	[Signature]	[Redacted] Seaside Dr	[Redacted]
Peggy Hinds	[Signature]	[Redacted] Seaside Dr.	[Redacted]
Sean Kane	[Signature]	[Redacted] Seaside Dr.	[Redacted]

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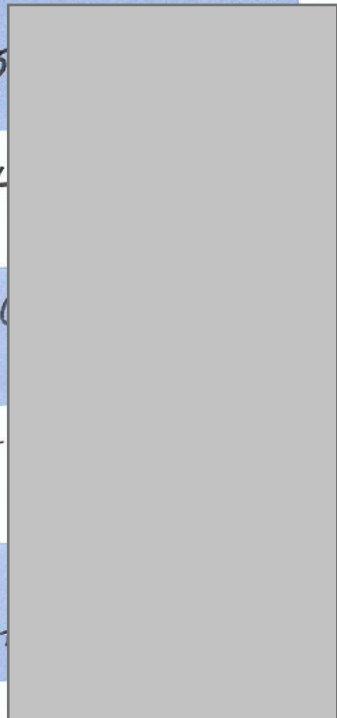
Petition to remove the Managed Retreat option for the Fairway Park West neighborhood.

Printed Name	Signature	Street Address	Phone/Email
Abigail Marshall	<i>Abigail Marshall</i>	████ Seaside Drive	
Jason Guillet	<i>Jason Guillet</i>	████ Seaside Dr	
JEFF GUILLET	<i>Jeff Guillet</i>	████ SEASIDE	
Amy Guillet	<i>Amy Guillet</i>	████ Seaside Dr	
Claire Guillet	<i>Claire E. Guillet</i>	████ Seaside Dr.	
Michele Pitt	<i>Michele Pitt</i>	████ Marina Way	
DALE PITT	<i>Dale Pitt</i>	████ MARINA Way	
Raul Barrera	<i>Raul Barrera</i>	████ Seaside Dr	
Cristal Barrera	<i>Cristal Barrera</i>	████ Seaside Dr	
Cecilia Martinez	<i>Cecilia Martinez</i>	████ Seaside Dr	
Ana Barrera	<i>Ana Barrera</i>	████ Seaside Dr	
Tim Sang	<i>Tim Sang</i>	████ BRADFORD WAY	
ERTHER LEONG	<i>Erther Leong</i>	████ SEASIDE DR.	

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Petition to remove the Managed Retreat as an option for the City of Pacifica

Printed Name	Signature	Street Address	Phone/Email
Denise Crawford	<i>Denise Crawford</i>	████ Seaside	5
Christina Crawford	<i>Christina Crawford</i>	████ Seaside Pacifica	4
DAN PEKNILL	<i>2769 SEASIDE Dan Pecknill</i>	████ Seaside Pacifica	0
Emiliano Acosta	<i>215 Pine Emiliano Acosta</i>	████ Pinehaven Pacifica	
Linda Acosta	<i>Linda Acosta</i>	████ Pinehaven Pacifica	



WE REJECT MANAGED RETREAT TO PROTECT OUR HOMES AND BUSINESSES

Printed Name	Signature	Street Address	Phone/Email
Emily Saunders	<i>E Saunders</i>	██████████ Greenway Dr. Pacific, CA 94044	[Redacted]
ALFRED HULLA Christina Hulla	<i>alfred hulla</i> <i>Christina Hulla</i>	██████████ Greenway Dr. Pacific CA 94044	
Amber Waters	<i>Amber Waters</i>	██████████ Greenway Dr. Pacific CA 94044	
John Borlana	<i>John Borlana</i>	██████████ Greenway Dr. Pacific CA 94044	
Rolph Klausner Colleen Klausner	<i>Rolph Klausner</i> <i>Colleen Klausner</i>	██████████ Greenway Pacific CA 94044	
Linda Meyer	<i>Linda Meyer</i>	██████████ Manzanita Dr Pacific	
Debbie Willers	<i>Debbie Willers</i>	██████████ Greenway Dr Pacific 94044	
David Wardell	<i>David Wardell</i>	██████████ Greenway	
DOMINIQUE WARDLE	<i>DOMINIQUE WARDLE</i>	██████████ GREENWAY PACIFICA	
Stewart Baxter	<i>Stewart Baxter</i>	██████████ Greenway Dr. Pacific	
Gabriela Gonzalez-Baxter	<i>Gabriela Gonzalez-Baxter</i>	██████████ Greenway Dr. Pacific ca	
Michael + Jill Demerjian	<i>Michael + Jill Demerjian</i>	██████████ GREENWAY DR	

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WE REJECT MANAGED RETREAT TO PROTECT OUR HOMES AND BUSINESSES

Printed Name	Signature	Street Address	Phone/Email
Margaret Wilson	<i>MW</i>	█ greenway Dr Pacifica	
Tim Cotter	<i>TC</i>	█ Pinehaven way	
M. Cotter	<i>MCotter</i>	█ Pinehaven way	
T. Nanez	<i>TN</i>	█ Rosita Rd Pacifica	
Tim J Blanchard	<i>Tim J Blanchard</i>	█ Greenway Pacifica, CA	
Andy Russell	<i>ARussell</i>	█ Greenway Dr.	
ANDY PATTERSON	<i>AP</i>	█ GREENWAY DR. PACIFICA CA.	
Patrick Beattie	<i>PB</i>	█ Garden of Pacifica CA.	
Kirk Edison	<i>KE</i>	█ GARDEN LANE PACIFICA	

Petition to remove the Managed Retreat option for the Fairway Park West neighborhood.

Printed Name	Signature	Street Address	Phone/Email
STEPHEN ALVES	<i>SA</i>	SEASIDE	[REDACTED]
SHAWN VALE	<i>SA</i>	GREENWAY TR	
Jean-Luc Chiramberro	<i>JL Chiramberro</i>	Greenway Dr.	
Chris Tuci	<i>CT</i>	Greenway	
Stephanie Meyer	<i>SM</i>	Greenway	
JEREMIAH BRAZIL	<i>JB</i>	GREENWAY	
Amanda Ferron	<i>AF</i>	Greenway Dr.	
Pat Mulvaney	<i>PM</i>	GREENWAY	
Penny Nuntawong	<i>PN</i>	Greenway Drive	
Dennis Miralda	<i>DM</i>	Greenway	
MARIE MIRALDA	<i>MM</i>	Greenway Dr	
Lily Lum	<i>LL</i>	Greenway Dr	
Jenifer Nevils	<i>JN</i>	Greenway	
JAYNE MATHER-Kane	<i>JM</i>	Greenway	
Victoria Laskalak	<i>VL</i>	Greenway	
Caroline Chiramberro	<i>CC</i>	Greenway Dr.	

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Petition to remove the Managed Retreat option for the Fairway Park West neighborhood.

Printed Name	Signature	Street Address	Phone/Email
SUES ELDREDE	<i>Sue S. Eldredge</i>	[REDACTED] PALOMA AVE, PACIFICA 94044	
DAVID HALBURTON	<i>David Halburton</i>	[REDACTED] SEASIDE DR, PACIFICA 94044	
Carol Dunne	<i>Carol Dunne</i>	[REDACTED] Greenway Dr.	
ERIC MYHRES	<i>Eric Myhres</i>	[REDACTED] GREENWAY DR	
MARIE Minalda	<i>Marie Minalda</i>	[REDACTED] greenway dr	
Melanie Cotter	<i>McCotto</i>	[REDACTED] Pinehaven	
Kathleen Pantoleon	<i>Kathleen Pantoleon</i>	[REDACTED] Pinehaven W	
George Pgeka	<i>George Pgeka</i>	[REDACTED] Seaside Dr.	
Linda Acosta	<i>Linda Acosta</i>	[REDACTED] Pinehaven	
Angela Price	<i>Angela Price</i>	[REDACTED] Seaside Drive	
Stacy Price	<i>Stacy W. Price</i>	[REDACTED] Seaside Dr.	
Michael Grandon	<i>Michael Grandon</i>	[REDACTED] Seaside Dr	
MARIANNE GRANDON	<i>Marianne Grandon</i>	[REDACTED] SEASIDE DR	
Sunshok Murthy	<i>Sunshok Murthy</i>	[REDACTED] Greenway Dr	
Jesse Thomas	<i>Jesse Thomas</i>	[REDACTED] Seaforth Ct	
Karen Doss-Thomas	<i>Karen Doss-Thomas</i>	[REDACTED] Seaforth Ct	
Kevin McCloskey	<i>Kevin McCloskey</i>	[REDACTED] FAIRWAY DR	
William Tobin	<i>William Tobin</i>	[REDACTED] Arleen Wy	

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WE REJECT MANAGED RETREAT TO PROTECT OUR HOMES AND BUSINESSES

Printed Name	Signature	Street Address	Phone/Email
Raquelle Melton	<i>R Melton</i>	████ Bower	
Dewey T. Melton	<i>Dewey Melton</i>	████ Bower rd	
Steve Sinai	<i>SS</i>	████ San Pablo Terrace	
Jane Lee	<i>J Lee</i>	████ Greenway	
GERALD LEE	<i>Gerald Lee</i>	████ GREENWAY DR.	
Chris Redfield	<i>Chris Redfield</i>	████ Buffalo Ct	
Lisa Alasandro	<i>Lisa Alasandro</i>	████ Lundy Way	
Vickie Flores	<i>Vickie Flores</i>	████ Shell St	
Gioconda Fan	<i>Gioconda Fan</i>	████ Beach Blvd.	

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Alasandro

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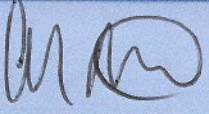
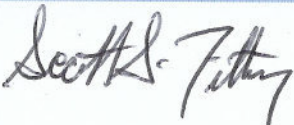
Petition to remove the Managed Retreat option for the Fairway Park West neighborhood.

Printed Name	Signature	Street Address	Phone/Email
USA TO		████████ LOMA VISTA TER PACIFICA 94044	
Thomas Busky		████████ Piedmont Av Pacific CA	
Lizelle Keane		████████ Seaside Dr Pacifica CA	
Jan Barris-Halliburton		████████ Seaside Dr. Pacifica	
Jose Luis Barris Corzante		" "	
Lillian K Arnaunder		████████ Seaside	
Regan Lom		████████ Greenway	
Gary Cotitta		████████ Seaside Dr.	
Lily Cotitta		████████ Seaside Dr.	
Paul Lavorini		████████ Paloma AVE	
Michelle Lavorini		████████ Paloma	
Dylan Lavorini		████████ Paloma.	

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Petition to remove the Managed Retreat as an option for the City of Pacifica

Printed Name	Signature	Street Address	Phone/Email
CHUCK WATERS		[REDACTED] Greenway 94044	[REDACTED]
Scott Titley		[REDACTED] Santa Rosa Pacifica	

Atto, Com
o. Com

O'Connor, Bonny

From: John Negley <[REDACTED]>
Sent: Wednesday, August 29, 2018 3:22 PM
To: Sea Level Rise
Subject: No to Managed Retreat

1 | I cannot believe that I am even sending an email to express how absolutely idiotic the managed retreat plan is. It needs to be stopped, there are countless reasons against it. Then again, maybe I should not be surprised since Keener, Martin and Digre are so adamantly opposed to any development at all in Pacifica and have been proponents of this ridiculous idea for years. I will not waste my time listing the reasons why I am against the plan, it will not be read, this email only tallied as a no. So let it stand that I am against it.

John Negley
[REDACTED] Milagra Dr.
Pacifica, CA

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O'Connor, Bonny

From: Linda Acosta <[REDACTED]>
Sent: Wednesday, August 29, 2018 4:37 PM
To: Sea Level Rise
Subject: Sea level rise

1 | I am a homeowner, tax payer, and an environmentalist adamantly opposed to the map drawn that incorrectly shows the west fairway park neighborhood to be in any way subject to managed retreat plans. At 16plus feet above sea level and with wetlands between us and the rising ocean, we are protected for well over the two hundred years, if not more. And I hope this next generation will do better than we did as stewards of this earth and roll back global warming.

Linda Acosta
[REDACTED] Pinehaven way
Pacifica, ca 94044

Sent from my iPhone

O'Connor, Bonny

From: Lauren Black [REDACTED] >
Sent: Wednesday, August 29, 2018 12:44 PM
To: Sea Level Rise
Subject: Please oppose managed retreat

Hi,

1 | My name is Lauren Black and I am a home owner on Shoreview Ave. I am writing to ask you to reject any inclusion of "managed retreat" as an adaptation plan for sea level rise. I have attended several of the public meetings and I understand the need to address sea level rise but I do not think managed retreat is a good solution.

Thank you!

Sincerely,
Lauren L Blac
[REDACTED] Shoreview Ave
Pacifica, CA 94044
[REDACTED]

O'Connor, Bonny

From: Judy Borland [REDACTED] >
Sent: Wednesday, August 29, 2018 11:46 AM
To: Sea Level Rise
Cc: Judy Borland
Subject: Managed Retreat - Adaptation Plan Review

I am a 42+ year resident and homeowner in Fairway Park, Pacifica. I have raised 3 children and paid taxes for all of these years. I am amazed that the City Council of Pacifica and the Coastal Commission holds no value for me, my family and my home. Where is the moral conscience and basic regard for another human being. You value something other than the lives of people.

1 It is humorous that you call your plan a 'managed retreat'. The destruction to the lives and homes of all who live on the west side of Highway 1 is not manageable. It is cruel and inhuman. I reject your adaptation plan for Pacifica. I reject your 'business as usual' contemptible behavior. We are people. These are our homes. These are lives that you so casually toss aside. Is that who the individual members of the City Council of Pacifica and the Coastal Commission have become?

I ask that you look at us. We are people. These are our homes. These are our lives. Please look at us.

Judy Borland
[REDACTED] Greenway Drive
Pacifica, CA 94044
[REDACTED]

O'Connor, Bonny

From: William Bradford <[REDACTED]>
Sent: Wednesday, August 29, 2018 3:48 PM
To: Sea Level Rise
Subject: Managed Retreat

To all my city representatives,

I think a managed retreat option placed in our community response to potential sea level rise is way too premature.

The predictions of the degree of sea level rise is very broad and speculative. Many predictions from the recent past have not come to pass and extreme sea level rise may very well be another of those unrealized predictions.

The action points the report notes are 1-3 feet of rise. If those extremes are experienced we will have time in the future to determine if we can armor against it or must resort to managed retreat. If it happens rapidly we will not have time for managed retreat – it will just be RETREAT.

To say the “sky is falling” at this point and put a cloud on the properties of your constituents and tax payers would be a major dereliction of your duties to those citizens.

So I ask you respectfully to reject managed retreat as a considered option responding to the potential sea level rise.

Thank you for your time and attention.

Sincerely,

William Bradford
[REDACTED] Ridgeway Drive
Pacifica

Click [here](#) to report this email as spam.

O'Connor, Bonny

From: amy [REDACTED]
Sent: Wednesday, August 29, 2018 8:15 AM
To: Sea Level Rise
Subject: Final Draft Adaptation Plan

1 Pacifica must continue to consider managed retreat to avoid the chaos and expense of emergency retreat. Protecting our infrastructure such as sewers and electricity is the highest responsibility of the city. Climate change is projected to effect us faster than expected with more ferocity. While Pacifica is most focused on sea level rise at this time,

I urge the city to start considering the reality (already happening in the USA and around the world) of potentially more imminent threats such as extreme heat (we need cooling centers in town), fires, landslides, flash floods, hillside/canyon erosion, extreme drought and food scarcity. While we focus our attention on sea level rise, we ignore that all other climate related disasters will be emergency based threats and we must start planning for this grim reality now. Water and food will be humanity's greatest need by mid-century

Amy Caplan
[REDACTED] Manor Drive
Pacifica

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O'Connor, Bonny

From: DEBBIE DURHAM [REDACTED]
Sent: Wednesday, August 29, 2018 3:54 PM
To: Sea Level Rise
Subject: Managed Retreat

This is to let you know my concerns about the managed retreat plan. I am opposed to Fairway Park being included in the plan. Our neighborhood is 1/4 mile from the ocean. We already have a berm in place with rocks to break up any waves that might hit it. The Coastal Commission requires San Francisco to maintain the berm at no cost to the city. The beach below is the widest along this stretch. Unlike the Northern section of beach we do not have waves crashing over a sea wall, in fact, I have never seen the waves run up to the berm, even in the winter with the big swells.

I specifically chose this neighborhood when I moved here eleven years ago because it seemed like one of the safer neighborhoods in terms of flooding, landslides and sea level rise. That has proven to be true. While Linda Mar has flooded and waves break over the seawalls at the pier and Rockaway, and apartments fall into the sea near the Esplanade, our neighborhood has remained free of those issues.

1 I am an environmentalist, a member of the Pedro Point Surf Club, and I volunteered for many years for the Surfrider Foundation when I lived in San Francisco. I believe in climate change and the need to adapt. However, imposing immediate negative consequences on a community over changes that may take years to come about, or may not come about at all, is not fair to the families who live and work in Pacifica. One highlight of climate change is that it is unpredictable. I don't think anyone imagined the firestorms that have ravaged our state in the last ten months, and yet that threat is here and now. I wonder if the city is doing anything to lessen the chance of a catastrophic fire taking place in our area. It would be better if the city focus on more immediate threats, like fires, homelessness and affordable housing rather than forcing through with a plan for 80 years in the future that is punitive to the current residents and taxpayers.

Our community is a group of families, young adults and seniors, who are mostly working and middle class, many who have lived here for decades and a handful of newcomers. I would say that for most if not all of them, the equity in the home is their largest investment, and their homes are their most cherished possession. For my husband and I, as we prepare for retirement in the next couple of years, a decline in the value of our home would be devastating. I believe it would be so for most of the people who will be impacted by this plan.

I strongly urge you to reconsider and remove West Fairway Park from the managed retreat plan, and to reconsider the plan entirely. It is not going to help any of the citizens of Pacifica, and could cause a great deal of harm. If you will not, then myself and many of my neighbors will do our best to elect

1 (Cont.) representatives in November who will truly take our concerns into consideration, and who will govern in the best interest of the citizens they represent.

Debbie Durham

■ Seaside Dr.

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Aug 29, 2018

Bouny O'Connor

TO: Sealevel Rise Comments

1

Please carefully consider the homeowners and families of those living closest to the coast. We want to protect our property and of course we think both property and coast can be protected. Please don't make our lives miserable with managed retreat.

Suzanne Gaudi

O'Connor, Bonny

From: Margaret Goodale <[REDACTED]>
Sent: Wednesday, August 29, 2018 1:07 PM
To: Sea Level Rise
Subject: Final Adaptation Plan comments

Hi Bonny,

Thanks for all your hard work!

Here are my comments:

Final Adaptation Plan Comments – Margaret Goodale

One general comment: I have a grave concern for our beaches which are a public trust. Conserving our beaches can help to keep Pacifica fiscally sound. Nourishing beaches for the sake of protecting the land behind them and for the pleasure of people will not, however, maintain a healthy beach ecology for the natural inhabitants. Only allowing the beach to migrate landward and recruit sand naturally will accomplish that goal. I sadly see no future for the birds (and their prey) that now depend on our Pacifica beaches to refuel and rest during their extensive migrations.

An ACE question: After the 2016 breach of the retaining wall north of the pier the Army Corps promised help. Three areas were originally included: Esplanade, the Milagra outfall, and Beach Boulevard. Have the results from the ACE feasibility study been incorporated into the current Adaptation Plan? Has the City received the ACE cost/benefit study? When will those results be made available to Pacifica and its citizens if they are not already available? This information would be useful as we determine policy for the future.

SLR Adaptation Plan specifics

Section 3.2 Monitoring Change

I particularly appreciate the explanations and specificity of the adaptation thresholds/triggers detailed in Table 2 on page 20. Because “triggers” must differ so radically where our geology and vulnerabilities differ, I hope that even more detailed responses will become part of policy. Policy must also include monitoring and identifying significant changes as stated.

Section 4.1 Subarea Recommendations

Because west Sharp Park is so immediately vulnerable due to the location of the old wastewater treatment plant and the sewers draining to it, and because of the inherent limitations of seawalls, more specific information is needed on the managed retreat strategy of reconfiguring lines to make the lines along Palmetto primary. Alternately, there need to be considerations of other methods of dealing with the gravity lines in West Sharp Park.

Section 5.1 Transfer of Development Rights

5

For this strategy to work it will be very important to identify receiver sites absolutely as soon as possible. Policy should perhaps restrict their development for use only as TDR receiver sites.

Finally, a very big THANK YOU for the thorough and detailed work that has gone into this plan.

Margaret Goodale

 Palou Drive

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O'Connor, Bonny

From: Marianne Grandon <[REDACTED]@[REDACTED].com>
Sent: Wednesday, August 29, 2018 12:35 PM
To: Sea Level Rise
Subject: Absolutely no managed retreat for Pacifica!

The data you are basing your "decision" on and forcing this issue through is not impactful to our area. Check the numbers. Check the reports that are actually valid. The rise is minimal over the next 100+ years and if the berm is maintained will not affect our area.

1

No to managed retreat.

No to our current mayor and city council if this passes. You will not be re-elected.

Marianne Grandon
[REDACTED] Seaside Dr

[Sent from Yahoo Mail for iPad](#)

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O'Connor, Bonny

From: Michael Grandon [REDACTED]
Sent: Wednesday, August 29, 2018 4:17 PM
To: Sea Level Rise
Subject: VOTE NO TO MANAGED RETREAT

Hello,

The data you are basing your "decision" on and forcing this issue through is not impactful to our area. Check the numbers. Check the reports that are actually valid. The rise is minimal over the next 100+ years and if the berm is maintained will not affect our area.

Vote "No" to managed retreat.

I will not support or vote for our current Mayor and City Council if this passes. You will not be re-elected.

Michael Grandon
[REDACTED] Seaside Dr
Pacifica CA 94044
[REDACTED]

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O'Connor, Bonny

From: Norma Hilton [REDACTED] >
Sent: Wednesday, August 29, 2018 4:35 PM
To: Sea Level Rise
Subject: Objection to proposal for "managed retreat"

1 | I want to be sure you know that I strongly object to your plan to create a "managed retreat." It is an absolutely absurd notion and reflects how truly ignorant you are of the neighborhood and the people who live here. This "plan" should be rejected in whole; it will devastate the community.

Norma Hilton
Lundy Way

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O'Connor, Bonny

From: Sean P. Keane <[REDACTED]>
Sent: Wednesday, August 29, 2018 2:44 PM
To: Sea Level Rise
Subject: Fairway Park West

Thank you for your time.

I own and live at [REDACTED] Seaside dr in West Fairway.

I absolutely disagree that West Fairway Park should be in the managed retreat zone. It doesn't make any sense. This area is farther away and higher in elevation from the ocean.

1 It was lumped in with Sharp Park which is waterfront and already being covered during winter high tides with water. These are completely different conditions/situations and should be treated as so.

By passing this, you would be taking our lives out from under us. There is no need to rush this type of situation, as it will be many years till it happens. It should be studied locally in greater detail and voted on by the citizens and not forced upon the tax paying people of Pacifica,

"I ask that you look at us. We are people. These are our homes. These are our lives. Please look at us. " JB

Sincerely,
Sean P. Keane

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O'Connor, Bonny

From: James Kimball [REDACTED] >
Sent: Wednesday, August 29, 2018 11:58 AM
To: Sea Level Rise
Subject: Fw: Managed Retreat

1 | I would like to voice our concerns regarding the managed retreat and our sea level rise.
We would like to reject the managed retreat as an adaption plan for our community.
We have signed the petition. And would like to city council to reject any managed retreat issues.

Best,
Jim and Debbie Kimball
[REDACTED] Seaside Drive.
[REDACTED]

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O'Connor, Bonny

From: Shirley A Lorence [REDACTED] >
Sent: Wednesday, August 29, 2018 1:48 PM
To: Sea Level Rise
Subject: West Fairway Park

1 I've lived here 40 years like many other people here watch prices for homes go up and everything else included. For those of us who are retired on fixed incomes this would be an undue burden to now require we have flood insurance and/or any other financial burden associated with managers retreat. Given that we are distance from the ocean by San Francisco's maintenance of the berm, I don't logically see why we should be designated a management retreat area when it would not affect West Fairway Park at all to leave this area the way it is as long as the berm is being maintained. I do realize in time everything will change, but why force it on tax paying homeowners unnecessarily as long as San Francisco maintains the berm and the golf course this would be an undue unnecessary burden on Westberry Park residents.

Sent from my iPhone

O'Connor, Bonny

From: Gibbs, Tina
Sent: Wednesday, August 29, 2018 2:49 PM
To: O'Connor, Bonny
Subject: FW: Comments for LCP Regarding Sea Level Rise

From: [REDACTED]
Sent: Wednesday, August 29, 2018 2:38 PM
To: Gibbs, Tina
Subject: Comments for LCP Regarding Sea Level Rise

Here are my comments regarding the Pacifica LCP:

My position: I am strongly AGAINST inclusion of MANAGED RETREAT in the LCP at this time.

Inclusion of Managed Retreat language in the LCP will have immediate impact on property owners and businesses living within the designated zones. We just do not yet know the extent of the impact. It will likely make securing mortgages, improvement loans and permits more difficult. It is unclear what impact it may have on getting or maintaining insurance on these properties, or whether insurance companies would increase rates if they chose to cover these properties. Considering that 85% of Pacifica businesses and 12% of the residencies are along the coast, this will certainly have negative consequences for the city's tax base. (By the way, we would like to see what percent of total city tax revenue is generated by property owners and businesses within the designated zones - this has not been demonstrated yet.

Its premature to include managed retreat language that will have some degree of negative impact on the city and its individuals for the following reasons:

1. There are no details of what's included or excluded in the term managed retreat, how it will be implemented, and the implications for the city as well as the property owners. At each town hall, there have been questions about what 'managed retreat' really means and the response has consistently been that its not yet known. There is complete lack of clarity on the implications for property owners and the city. All the other options have been studied extensively, by zone, and described in detail. But no details are available for managed retreat. Managed retreat should NOT BE INCLUDED until there is information for citizens to react to.

2. The tax and revenue implications of managed retreat in the assessments for the draft LCP appear incomplete or overly optimistic. For example, in the case of a flood or sea-level rise disaster in Rockaway Beach, the hotels and restaurants close but reopen within weeks after repairs, resulting in minimal impact on city tax revenues. But there is no discussion about whether the hotels could get improvement loans, building permits, or new insurance policies in a managed retreat zone. Nor was there discussion about the city's obligations or responsibilities to repair infrastructure that might be required before the businesses could reopen. City revenue implications of LOSS of those business and hotel occupancy taxes should be analyzed in what seems like a very real scenario under a managed retreat designation. Managed retreat should NOT BE INCLUDED until there is a more realistic and fully analyzed assessment of the impact on city revenues.

3. Proponents of including managed retreat language say that the option is inevitable and including now will save Pacifica residents from paying more taxes or floating large additional bonds. However, if we take city officials at their word at the town hall meetings, then managed retreat is never a preferred option and in no scenario does it replace options A or B. If this is true, then there is no upside to including the language at this time (as it will not save taxes or prevent new bond issuances), but only have a negative impact on the property and business owners along the coast.

In conclusion,

Inclusion of managed retreat language now will have real and immediate impact on property owners in the designated areas (value, loans, insurance)

Not including managed retreat language has no impact on our ability to maintain this option for inclusion in future plans when more information is available. Not including managed retreat has no impact on the decision to implement options

2 (Cont.) A or B in the LCP (at least as discussed at the town hall meetings) and therefore does not have an immediate impact on residents' taxes.

Property owners, taxpayers, and voters in the designated zones deserve as much detail and assessment of the managed retreat option as they do for the other options put forth in the LCP. This detail is not available, and we should not be forced to accept something sight unseen.

regards,

Lori Martin

██████ Kent Rd

Pacifica, CA 94044

████████████████████

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O'Connor, Bonny

From: Mlcalifdreaming [REDACTED] >
Sent: Wednesday, August 29, 2018 11:38 AM
To: Sea Level Rise
Subject: Comments on Sea Level Rise Plan

These are my comments on the Local Coastal Plan LCP):

I have attended the public meetings regarding the current proposal and I am **AGAINST** including "**MANAGED RETREAT**" in the plan at this time. This plan has been rushed through by members of the City Council and requires more time for residents of Pacifica to better understand the full implications of the issues involved. Further, there has not been adequate opportunity at the public meetings to ask questions. While we were allowed to ask one question at the end of each meeting, we were not allowed to ask questions regarding the slides/information presented as they were being presented. I realize that this would require more time, but this issue is too important to be rushed. Much of the data presented on the slides contained questionable assumptions that we were not allowed to get clarified or challenged.

The option of "**Managed Retreat**" is an option that requires a better understanding by the citizens of Pacifica, does not need to be rushed through, and must be **ELIMINATED FROM THE CURRENT PLAN.**

I will not vote for any City Council candidate that supports "Managed Retreat" at this time.

Sincerely,

Michael Martin
[REDACTED] Kent Road
Pacifica, Ca 94044
[REDACTED]

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O'Connor, Bonny

From: Kevin McCluskey [REDACTED] >
Sent: Wednesday, August 29, 2018 1:39 PM
To: Sea Level Rise
Subject: Fairway Park inclusion

1 | The inclusion of West Fairway Park as part of the "managed retreat" plan is asinine. Not only does it defy logic, it's the product of someone being too lazy to separate out the area from Sharp Park. It may have been convenient to use the same ESL map that wrongfully connected the two very different areas as one area in terms of threat of SLR. However, in doing so, the city has subjected our neighborhood to immediate negative effects. So negative in fact that litigation will be happening soon if the mistake borne of laziness / incompetence is not rectified.

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O'Connor, Bonny

From: Ryan Grimm [REDACTED]
Sent: Wednesday, August 29, 2018 10:11 PM
To: Sea Level Rise
Subject: Managed retreat for Fairway Park seems unnecessary

Hi,

I understand that sea level rise and what should be done to prepare for it is a very complicated topic and I honestly appreciate that Pacifica is thinking about it now instead of 10, 20, 30 years from now. That said, I don't believe that managed retreat is a necessary option for West Fairway Park.

My wife and I purchased our home at [REDACTED] Seaside Dr in West Fairway Park almost 4 years ago. We have our entire life savings in this home. We are hoping that it plays a substantial part in our retirement 20 years from now. We work every week to make payments on the loan and every weekend making improvements to the house. So far we've spent nearly \$100k in renovations. We love our home, we love West Fairway and we love Pacifica.

My understanding is that the city intends to try to maintain the seawall and protect our homes, but is leaving the option open for managed retreat in our area down the road. It's good to have options, but there are other options for our neighborhood that are easy to implement and less costly than both managed retreat or maintaining the seawall. Options that allow us to maintain the investments that we've had in our home, keep ~700 people in Pacifica and not induce fear or lack of confidence in the city for those in other areas as well.

Here's my proposal...

1 I propose that the plan is to try to maintain the seawall for as long as San Francisco is willing to pay for it, essentially put it in their hands. If they no longer want to our are able to maintain the seawall, when removing the material, simply place it around the north and west edges of Fairway Park West (and probably parts of Sharp Park as well).

The benefits of this idea are numerous. Removal of the seawall will be cheaper because the material won't need to be transported far. A berm around the north and west sides of our neighborhood would only need to be 3-6 feet tall to keep our homes dry. This berm would be vastly cheaper to maintain than a seawall because it would only need to withstand occasional flooding during storms due it being a quarter mile back from the shoreline verses content pounding by waves. The storm drains in our neighborhood would need to be pumped to the other side of the berm, but handy enough, the existing pump that empties the lagoon behind the seawall is more than adequate for the job and would need a new home without the seawall there.

The berm on the west side could be placed where the existing trail is and would simply raise the trail to a new elevation. So the berm wouldn't even impact any ecosystems beyond what the trail already does. The environmental groups would be thrilled with having 99% of the area back to being brackish wetlands, a change that I would actually be pretty excited about too! Plus 700 people (and a quarter billion worth of real estate) would be able to maintain their investments and continue to have a place to live.

I don't know if such a solution has been proposed or analyzed. But it seems like a very viable alternative to me that could satisfy the needs of every party involved. Perhaps it's more complicated than just slapping a label of managed retreat on our neighborhood. But we're talking about actual people here that as the plan currently sits would needlessly have a significant portion of their lives ruined.

1 (Cont.)

I'm sure you're receiving a variety of emails for my neighbors, some angry, some polite. But please understand that we are all honestly pretty terrified of what you're considering. All that we are really asking is that more consideration be given to other options for the lives that we love and have worked hard for.

From one person to another, thanks.

—Ryan

O'Connor, Bonny

From: Delia McGrath <[REDACTED]>
Sent: Wednesday, August 29, 2018 11:13 AM
To: Sea Level Rise
Cc: Delia McGrath; assemblymember.mullin@assembly.ca.gov; DHorsely@smcgov.org
Subject: Comments re: Pacifica Sea Level Rise Adaptation Plan [Draft]

Dear Bonny O'Connor, Associate Planner

I attended two of the public workshops on Sea Level Rise, including the one on 08/11. I picked up a copy of the draft plan and have read it. I have given this discussion a great deal of thought and submit my comments here today, as a 40-year homeowner resident of Pacifica. I care about everyone in this beautiful City and want the best, most effective plan to keep our City and all its residents safe and secure — and financially solvent.

One thing is absolutely clear to me: that is the need for the final Adaptation Plan to include the provision for managed retreat amongst the options available, when, and if, needed.

Our City faces an uncertain future with respect to the impact of sea level rise and concomitant vulnerabilities of property and people. Not to include managed retreat as an option is reckless and irresponsible. Managed retreat will be one of the City's important alternatives; it is an effective tool that can proactively protect City infrastructure, coastal access, recreation, habitats, development, and other resources. The Adaptation Plan must provide for the full range of immediate and long-term planning options, if the plan is to be comprehensive and cost-effective. Managed retreat will strengthen our capability to retain our beaches, coastal access, habitat and recreational opportunities. Evidence to support this prospect is our successful managed retreat project at Linda Mar State Beach.

As you know, our City has already lost valued recreational opportunities, some of our coastal access and even private properties due to erosion and storm surge damage. We don't have needed funds to fix our storm damaged infrastructure, including, for example, the Beach Boulevard seawall. How will the City deal with funding the damages expected in the future? Will the City need to increase our taxes to maintain our coastal infrastructure let alone our beaches and private property? The draft Adaptation Plan estimates approximately \$200-300 million will be required to implement the Adaptation Plan without managed retreat. Think about that! We aren't currently able to secure the funding for the estimated \$5 million to repair/replace the Beach Boulevard seawall. What realistic sources of millions more can the City expect to find in the coming years? Deciding to eliminate an essential plan option such as managed retreat is unthinkable.

Please do your very best to include managed retreat in the final Adaptation Plan. I thank you for your kind consideration.

Peace always, Delia McGrath

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O'Connor, Bonny

From: DENNIS MIRALDA [REDACTED]
Sent: Wednesday, August 29, 2018 12:37 PM
To: Sea Level Rise
Subject: Fairway Park Managed Retreat

Least you shall not forget that you represent the people---

1 In the words of Abraham Lincoln---" **government of the people, by the people, for the people**"

Listen to the people of Fairway Park managed retreat is not a solution

Dennis Miralda
[REDACTED] Greenway Dr.
Pacifica, Ca. 94044

Sent from [Outlook](#)

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O'Connor, Bonny

From: Stephanie Meyer [REDACTED]
Sent: Wednesday, August 29, 2018 10:15 PM
To: Sea Level Rise
Subject: No Managed Retreat for Fairway!!!

1 I was born and raised in Fairway Park, Pacifica. And I live in the house my parents bought after living in a duplex on Bradford Way. My parents scrimped and saved to buy and maintain our home and I've deeply appreciated their sacrifice ever since. It is precious to be able to own a home. I am surprised that the City Council of Pacifica and the CA Coastal Commission don't value me, my new and growing family and how devastating it will be to declare Managed Retreat for something that may or may not happen in 30-100 years. It is cruel and inhuman and even feels illegal. I am opposed to Fairway Park being included in the plan. Our neighborhood is 1/4 mile from the ocean and we have a birm in place that is managed by the City of San Francisco (no cost to Pacifica). We DO NOT have waves crashing over a sea wall, which I heard is being spread around to scare people into believing there is a problem.

The environmental report cost ~ \$300,000 and was written by someone who is not completely objective on the seal level rise issues. This smells really fishy and wish we could get a "second opinion" report with ACCURATE data and photos.

The worst part is that I hear that those that favor this managed retreat designation have kept the public as well as us in Fairway Park in the dark about all these plans and are finding ways to squelch our voices. This is absolutely disgusting and I never thought a City could do this to its people. We pay property taxes, shop locally, and really enjoy being here, but with the consequences of managed retreat, our home values will decline immediately and there will be no valuable legacy to leave behind or retire with if we wish. Shame, shame, shame. Mangaged retreat for Fairway Park is WRONG.

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O'Connor, Bonny

From: marie miralda [REDACTED] >
Sent: Wednesday, August 29, 2018 6:21 PM
To: Sea Level Rise
Cc: marie miralda
Subject: Managed retreat

1 | As a homeowner in Fairway Park West for 44 years, I have not been concerned with flooding. The map you are going by was rejected by the Army Corps of Engineering we are a 1/4 of a mile from the ocean. Why is Fairway West even being concerned?? Why are you using an outdated and rejected map ?? Marie Miralda [REDACTED] Greenway Dr Sent from my iPad

O'Connor, Bonny

From: Eric Myhres [REDACTED] >
Sent: Wednesday, August 29, 2018 8:56 PM
To: Sea Level Rise
Subject: Final draft of Sea Level Rise Adaption Plan

I am angry and frustrated that I am finding out about this plan just before the city council is set to vote on it. This plan will have a major impact on many households in Pacifica. I do not feel that adequate efforts were made to inform affected property owners.

I object to managed retreat being part of the plan to address the neighborhood between the Mori Point and Sharp Park Golf Course and west of Highway 1. The neighborhood is protected by the SPGC earthen berm, the wetlands and the golf course. The berm is maintained by the City and County of San Francisco.

Maintaining existing armoring, adding additional armoring as needed, and beach nourishing is preferred.

I would also request that the council consider modification of existing structures be included in the plan. Raising existing structures would be less costly than acquiring the properties as part of a retreat plan.

I strongly encourage the Pacifica City Council to engage the U.S. Army Corps of Engineers for their involvement. The U.S. Army Corps of Engineers are experts at flood control and mitigation, and are actively working on both beach nourishment and armoring projects in the region.

Eric Myhres

O'Connor, Bonny

From: Pot Nuntavong [REDACTED] >
Sent: Wednesday, August 29, 2018 11:31 AM
To: Sea Level Rise
Subject: Sealevel

Dear Sirs,

1 | I am the resident of Fairway Park West and I reject managed retreat as an “adaptation plan” for
Pacifica. And I think it is unnecessary to have flood insurance because it is very expensive besides
we are a retired citizens. We have been living in this house for over 40 years. So please do not
destroy our dream not having our home to pass to our children.

Thank you and sincerely,

Pot Nuntavong

[REDACTED] Greenway Drive

Pacifica.

O'Connor, Bonny

From: andypatterson08 [REDACTED] >
Sent: Wednesday, August 29, 2018 5:30 PM
To: O'Connor, Bonny; Digre, Sue; Martin, Deirdre; Sea Level Rise
Subject: Regarding your decision on the our Fairway Park West Area (Managed retreat Area)

Sirs and Madame's,

Please let it be known that we the neighborhood of West Fairway Park are not going to go along with a plan that destroys are lives, lowers our property values and increases our insurance premiums unnecessarily.. Please reconsider your cooperation with this uncalled for man induced problem.

1 We have seen nothing that would alarm us or make us leave this area, except for Environmentalists putting their spin in places they do not live. We have gone through this when Sharp Park Golf Course was on the block for being a marsh land. After 10 long years and endless meetings, we were able to get the SF park beach and recreation and the SF Board of Supervisors to negotiate a deal.

We did not move here to wage war, we came here for the beauty and peacefulness of this area. Our neighbors are like minded and are very hard working people, not on the government dole.

We would appreciate your cooperation and mindfulness in this situation,

Sincerely,

Andrew and Kerry Patterson

[REDACTED] Greenway Drive.

Pacifica, Ca. 94044

[REDACTED]

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O'Connor, Bonny

From: Dan Peknik [REDACTED] >
Sent: Wednesday, August 29, 2018 3:21 PM
To: O'Connor, Bonny; Wehrmeister, Tina
Cc: Jeff Guillet
Subject: Area 4, Fairway Park West

Hi Bonnie and Tina,

1 | Wondering if you can help with some data or the right person to contact. ESA grouped Fairway Park West in the same risk zone (Area 4) as the Esplanade and similar. Why did they do that, and how can we understand their logic on this? We're pretty far from the ocean and above sea level over here. The report doesn't address what specifically it is about our area that causes us to be a recipient of Option 3 (Managed Retreat). The report Bonnie showed us was based on an Army Corps of Engineers report that we found was rejected by same! How do we track down this info?

Thanks for any assistance,
Dan & Jeff



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O'Connor, Bonny

From: Mike Reynolds [REDACTED] >
Sent: Wednesday, August 29, 2018 9:44 PM
To: Sea Level Rise
Subject: Managed retreat

1 | We own two homes in fairway park and are opposed to managed retreat. This is a bad idea and will be fought at every turn, being a donating member to the Pacific Legal Foundation they are a phone call away. Sincerely Mike and Barbara Reynolds

Sent from my iPad

O'Connor, Bonny

From: Thursday Roberts [REDACTED] >
Sent: Wednesday, August 29, 2018 9:58 AM
To: Sea Level Rise
Subject: Local Coastal Plan / Sea Level Rise

Hello,

1 | I just want to say that the city manager and city council are doing a spectacular job in the face of rather extreme emotionalism in the community. I admire and respect the professionalism, coordination with the coastal commission and reasonable tone taken on these issues. Thank you!

Thursday Roberts
[REDACTED]

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O'Connor, Bonny

From: Ramon Christopher Rodriguez [REDACTED]
Sent: Wednesday, August 29, 2018 7:31 PM
To: Sea Level Rise
Subject: Proposed Managed Retreat

1 Less than a week ago, the above plan to implement Managed Retreat to the Fairway Park West neighborhood was brought to my attention by my concerned neighbors. The economic consequences impacting myself and neighbors warrants concern and confusion. The data presented to me implies a lack of due diligence, a lack of proper notification and opportunity to educate ourselves and voice a thoughtful opinion. The information I heard expressed at the August 27th neighborhood meeting left me with the thought that the City of Pacifica Councilmen and women are not representing the citizens who voted them into office and are scheming to pass Managed Retreat to satisfy the interests of others "outsiders".

I reject the City of Pacifica's plan in implement Managed Retreat that includes the Fairway Park West neighborhood.

Ramon Christopher Rodriguez
[REDACTED] Seaside Drive, Pacifica 94044

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O'Connor, Bonny

From: Roiz, Linda B. <[REDACTED]>
Sent: Wednesday, August 29, 2018 11:53 AM
To: Sea Level Rise
Subject: NO MANAGED RETREAT!!!

*Linda Roiz
Assistant to Penelope Preovolos, Paul Flum, Mark Foster,
Robert May, and James Sigel
[REDACTED]
Morrison & Foerster
[REDACTED] Market Street
San Francisco, CA 94105*

=====
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O'Connor, Bonny

From: Steve Sinai [REDACTED]
Sent: Wednesday, August 29, 2018 2:50 PM
To: Sea Level Rise
Cc: [REDACTED]@yahoo.com
Subject: I am Opposed to Managed Retreat

1 Just a short note to let you know I think managed retreat for Pacifica is nonsense, and should be rejected. I know the three anti-development zealots on council, Keener, Martin and Digre, are merely using this as another bureaucratic impediment to development west of Highway 1, and won't listen to anyone who disagrees with them on managed retreat, so I won't waste time spelling out my reasons for opposing it. I'm just sending in this comment to officially register my opposition to it.

Thank you,

Steve Sinai
[REDACTED] San Pablo Terrace
Pacifica, CA 94044

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O'Connor, Bonny

From: Sandy Slick [REDACTED] >
Sent: Wednesday, August 29, 2018 9:46 AM
To: Sea Level Rise
Subject: Managed retreat

1 | This is ludicrous! Why would you ruin the lives of so many people when it is not necessary. What has happened to the compassion in this world. The coastal commission and those ruling Pacifica have gone down a very dark and deep hole. Remember you are responsible for your actions and your consequences will be great if you move forward in implementing managed retreat!

Sent from Sandy Slick's iPhone
God bless you

O'Connor, Bonny

From: Janet Talsky [REDACTED] >
Sent: Wednesday, August 29, 2018 2:28 PM
To: Sea Level Rise
Subject: NO "Managed Retreat" for West Fairway Park

Dear committee members,

1 We believe that these attempts to find an "adaptation plan" that involves making life unfair for West Fairway Park homeowners is unwarranted and even abusive. The community here is farther back from the shore, and way back on the east side of the levee. To say that homeowners here would need to purchase additional flood insurance should this plan go into effect would cause undue on-going financial burden. Many of us homeowners are retired, with a limited and restricted income. We are living on social security and pensions, and this does not accommodate unforeseen extra expenses. Also, to declare that we would not be able to gain permits for home improvements means that our older houses would suffer from further aging and decomposition. Our house values would become further negatively impacted, causing yet more financial burden.

To think that it might be such an easy answer to just declare the Fairway West community part of the "Managed Retreat" is short-sighted and irresponsible to place the burden on citizens' homes here, rather than hold government agencies to the line to make tangible improvements on existing levees and berms with tax paid funds for safeguarding the entire coastal community.

Please re-consider and DO NOT include the West Fairway Park Community as part of this "Managed Retreat" proposal.

Sincerely,
Janet and Ken Talsky
[REDACTED] Seaside Drive
Pacifica 94044

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O'Connor, Bonny

From: [REDACTED]
Sent: Tuesday, August 28, 2018 10:16 PM
To: Sea Level Rise
Subject: The failure of managed retreat

- 1) As the 6th largest economy in the world, it is a farce to imply that as part of California, Pacifica can't get funding to support stages 1 and 2 of the proposed plan which has only been proposed/bid to one vendor...I always get at least 3 bids when dealing with my own home....imagine a community...
- 2) For hundreds of years, many cities across the globe have managed the rise of water to create destinations communities....Venice and Amsterdam to name only 2 locations.
- 3) Since 2009, I have received only one invitation to participate in the sea level rise process and that is from the realtor group that was demonized in the public meeting for scare tactics
- 4) Based upon the info, "Managed Retreat" is a failure of imagination in one of the most imaginative places on the planet..the San Francisco Bay Area.

Sent from my Verizon, Samsung Galaxy smartphone

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O'Connor, Bonny

From: Stan Zeavin <[REDACTED]>
Sent: Wednesday, August 29, 2018 5:01 PM
To: Sea Level Rise
Subject: COMMENTS ON THE FINAL DRAFT OF THE SLR ADAPTATION PLAN

COMMENTS ON THE FINAL DRAFT OF THE SLR ADAPTATION PLAN (SLRAP)

I'd like to begin by stating that given the immensity of the project, both the city government and ESA are doing a tremendous job of collecting and collating the necessary data while, at the same time, keeping Pacificans informed of this process. For the 12% of our citizens who own property in coastal zone, it has been an understandably harrowing experience for them to work their way through this SLRAP process. Up to this point, for most of the 88% of our citizens who do not reside in the coastal zone, this project seems to be a very small blip on their radar.

I will address what I'd like to see included in the Adaptation Plan. Although these comments should be addressing the cost/benefit information in the LCP, I feel that these results are acceptable at this time. I certainly have more of an understanding of what each choice might cost even though exact rates will be different. If and when we hit particular trigger points (events), then, of course, more details would be expected. In the last meeting on August 11, there seemed to be some confusion about the use of trigger points vs. time lines. I would like to suggest that the city clarify the use of each term in the Adaptation Plan policy.

While finding a balance between the goals that the City Council wanted to see addressed in the SLRAP is a herculean task, I believe that the driving force behind many of our city's future decisions will be MONEY, as in, who pays. Therefore, consideration of the 6 out of 7 Pacificans not in the Coastal Zone who will be asked to raise their taxes is of prime importance.

This is what I'd like the city to emphasize:

1) PLANNING AND EVEN POSSIBLY BEGINNING CONSTRUCTION FOR AT RISK WASTEWATER AND INFRASTRUCTURE PROJECTS SHOULD BE A NECESSARY PRIORITY OF PACIFICA. A functioning sewer system benefits everyone and aids in keeping the citizens healthy. We should begin immediately to seek whatever grants that may help defray the costs of appropriate sewer planning.

2) MANAGED RETREAT NEEDS TO BE INCLUDED IN THE SLRAP. Simply put, it offers more options. With early planning (wastewater, etc.) the eventual cost will be smaller and possible emergencies could be avoided. It is also the major tool for saving a couple of our beaches, to help prepare for the erosion of the cliffs in the Fairmont Sub Area and prepare for the eventual response to the 'sub areas which are most at risk.

3) THE CITY NEEDS TO HAVE AN ALTERNATE PLAN FOR SHARP PARK GOLF COURSE. THIS PLAN SHOULD INCLUDE NO MORE ARMORING OF THE BERM SO SHARP PARK BEACH, ONE OF THE FEW BEACHES THAT CAN EXIST INTO THE NEXT CENTURY, CAN DO SO. SF has huge problems with Sea Level Rise. They will be spending an enormous amount of money to protect their city. There is a chance they may stop support of the Sharp Park berm anytime in the near future. Our city's plan to establish levees on Clarendon and Fairway Dr. will give longer protection for the at risk homes in the area's coastal zone while the wetlands will absorb much of future storms' fury.

1 (Cont.)

4) THE OWNERS OF ALL FUTURE BUILDINGS ERECTED ANYWHERE IN THE COASTAL ZONE SHOULD ASSUME ALL LIABILITY COSTS FOR THEIR PROPERTY. RESTRICT THE AREAS WHERE NEW BUILDINGS CAN BE ERECTED. The people of Pacifica should not be responsible for any buildings erected in a coastal zone. Possibly, none should even be built in that zone.

5) ANY ARMORING OR BEACH NOURISHMENT IN THE CITY PLANS NEEDS VERY CAREFUL CONSIDERATION. Given the cost of armoring and other protections, the city must not sacrifice monies that could be needed for infrastructure planning, rebuilding or relocation.

Now and into the future available money will guide most of the city's planning. In the recently available California State Fourth Climate Change Assessment, the low estimate of temperature rise is now +2.5 degrees by 2040. That would suggest that SLR will continue into, at least, the near future. So far, higher temperatures have meant increased glacier melting. The city must be prepared to protect the at risk infrastructure whenever trigger points are reached. If possible, we should also attempt to minimize the cost to our citizens through careful planning and preparation.

Stan Zeavin
Linda Mar

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O'Connor, Bonny

From: Vinh DePaul <[REDACTED]>
Sent: Thursday, August 30, 2018 8:47 AM
To: Sea Level Rise
Subject: Rejecting 'Managed Retreat'!

Hello,

I'm not sure if I'm too late to voice my concern over this issue, but I will make it short.

1 I purchased a home in the Sharp Park area in 2015 near the pier with the intent to retire here in 2020. This area that I've chosen to rest out of many other coastal areas in Northern California was because of its beautiful landscape and nature amenities.

I've worked very hard all my life to make this happen in my golden years, please don't make me regret my decision to retire here.

Thank you,

Vinh DePaul
[REDACTED]

O'Connor, Bonny

From: Celeste Langille <[REDACTED]>
Sent: Wednesday, August 29, 2018 5:22 PM
To: Sea Level Rise
Subject: Re: Comments on Final Draft SLR Adaptation Plan

To City of Pacifica

I recommend that an exploration of managed retreat be included in the Final Sea Level Rise Adaptation Plan, as it is an important strategy to consider to assure that the Plan is an effective tool for use in developing an LCP Update that proactively protects City infrastructure, coastal access, recreation, habitats, development, and other resources. The Adaptation Plan must discuss the full range of long-term planning options available to the City to address known vulnerabilities if the plan is to be cost-effective and feasible.

Managed retreat is only one planning option along with the other options addressed in the Plan, but it must be addressed along with the other options as a future tool especially if sea level rise accelerates or if the City can not find the funding to protect City infrastructure or development. In addition, managed retreat is a strong option to consider as we want to retain as much of our beaches, coastal access, habitat and recreational opportunities as possible. The City has already implemented a successful managed retreat project at Linda Mar State Beach.

City residents need fiscally conservative planning and policies as we have already lost recreational opportunities, coastal access and a variety of private properties to continuing erosion and storm surge damage. Crucially, we still don't have the funds to fix our storm damaged infrastructure, including the Milagra Creek outfall and the Beach Boulevard seawall. This lack of potential funding to implement the LCP is a serious concern that hasn't been adequately addressed. Will the City need to increase our taxes to maintain our coastal infrastructure let alone our beaches and private property? The Adaptation Plan estimates approximately \$200-300 million of costs to implement the Adaptation Plan without managed retreat, but our City can't currently find the funding for the estimated \$5 million to repair/replace the Beach Boulevard seawall so what realistic sources of \$200-300 million funding can the City expect to find in the next 20 to 30 years?

Please provide an analysis of need for raising taxes to implement this Adaptation plan.

Please separate the issue of the timing and cost of moving the City's infrastructure inland and analyze separately.

Under Transfer of Development Rights, please provide a more detailed description of how the process would work for 1) Existing open space and 2) Private Property. Provide examples of each. How does funding work for this process? Who pays for private property TDRs v Open Space TDR's? Overall this section needs more explanation of how TDR's would work specifically in Pacifica. There is a typo on the third sentence on page 36.

Chapter 5 would be more clear and helpful if the 5.1 Adaptation Measures matched both Table 4 and the numbered system first set out in Table 5.

Table 5 uses a numbered approach not found earlier in this Chapter and it would be useful to describe each adaptation measure in a numerical order throughout the document to provide clarity and consistency.

In Chapter 5, please provide a cost breakdown for each adaptation measure, ie. how much armoring costs per foot (or some other metric) so the public is more aware of the estimated cost of each measure. For beach/dune

6 (Cont.)

nourishment, please provide an estimate of how often this needs to be updated - yearly, every ten years. For example, I read that Malibu is spending approximately \$55-60 million dollars every ten years on Beach nourishment, so the estimated cost to the City of Malibu is \$5.5 million per year. This goes back to the need to disclosing a reasonable source of funding for adaptation measures so the City of Pacifica can inform the public of the long-term costs. Malibu is raising taxes to pay for their beach nourishment.

Thank you,
Celeste Langille

O'Connor, Bonny

From: Cristal Barrera [REDACTED]
Sent: Thursday, August 30, 2018 1:05 PM
To: Sea Level Rise
Subject: Vote no for managed retreat

August 30, 2018

To whom it may concern,

I am a 31 year old mother of 2 young children and resident of fairway park on Seaside. I was born in this house, my mother grew up in this house and my grandparents were the proud owners of this house. My children are 4th generation in our home.

I am in shock and incredibly heartbroken that the city council would consider putting our homes in danger forcing us to become a managed retreat area. **ITS NOT FAIR AND FEELS** as though there is no regard for my future or my family's future.

Forcing myself and my neighbors properties to drop in value because of "ocean to raise" being something that may or may not happen in our lifetime or the lifetime of our children and their children for that matter, I think it is **OUTRAGEOUS** and **RIDICULOUS**. And to benefit who? Certainly not myself or my family, passing voting this through.

I'm all for protecting the environment and planning ahead. I'm planning on raising my family and continuing to make the City of Pacifica a wonderful place to live. Because it's been home, it's home and it'll be home. Just like my family has done for years, where my grandfather Donald Campbell was a part of the first PB&R

commission, my mother hosted general elections in “Campbell’s garage” and I volunteered worked for PB&R for almost 10 years.

I STRONGLY URGE YOU TO FOCUS your efforts on saving homes and lives that may be in danger rather than taking the easy way out and giving up on us.

1 (Cont.)

We have City Council Members to represent us and not to profit from us. So, I cannot STRESS ENOUGH, for you to make the difference and represent us to VOTE NO for West fairway park to become managed retreat.

Thank you.

Sincerely,

Cristal Campbell Barrera

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O'Connor, Bonny

From: Raul Barrera [REDACTED]
Sent: Thursday, August 30, 2018 1:55 PM
To: Sea Level Rise
Subject: We Reject Managed Retreat as an "adaptation plan" for Pacifica

August 30, 2018

To whom it may concern,

I am a proud resident of fairway park, father of 2 young children and 4th generation residents of fairway park on Seaside. My wife and I are proud to see how our home once was initiated by her grandparents, and now our kids are to keep that legacy alive. My wife was 3rd generation and grew up in our home. So the least we can do is to keep our treasure protected.

The fact that city council would consider putting our homes in danger for some sort of "adaption plan" that doesn't even apply to current time, forcing us to become a managed retreat area ITS OUTRAGEOUS. Yet, fearing my family's future for an unnecessary life event, forcing ourselves and my neighbors properties to immediately become affected by this "adaption plan" in many ways (i.e. property value and unnecessary insurance). The consider fact of a suspected "ocean rise" being something that may or may not happen in our lifetime or the lifetime of our children and their children for that matter, it is a disturbing excuse from people in favor to make this plan happen. And to benefit who? Certainly not myself or my family.

We are raising our family here for the simple fact that we love the closeness to the ocean and the city of pacifica is a wonderful place to live and it is our home and it'll be home for a 5th generation.

My wife's grandfather Donald Campbell was a part of the first PB&R commission, my mother in law hosted general elections in "Campbell's garage" and my wife volunteered worked for PB&R for almost 10 years.

I STRONGLY URGE YOU TO FOCUS your efforts on saving homes and lives that may be in danger rather than taking the easy way out and giving up on us.

We have City Council Members to represent us and not to profit from us. So, I can STRESS ENOUGH, for you to make the difference and represent us to VOTE NO for fairway park not to become managed retreat. VOTE NO for this "adaption plan" to not pass.

Thank you.

Sincerely,

Raúl Barrera
[REDACTED]

O'Connor, Bonny

From: Peter Loeb [REDACTED] >
Sent: Thursday, August 30, 2018 4:21 PM
To: Sea Level Rise
Subject: Comment on draft SLR Adaptation Plan

I think the plan is thorough and comprehensive, a useful planning document. Unfortunately, there are comments in social media that demonstrate misunderstandings about the plan, such as these ones on Nextdoor:

One of the reasons so many people west of Highway 1 are opposed to the city's managed retreat plan is that they are at very little, or no risk of flooding, yet will be placed into a "danger" zone where they are forced to buy flood insurance and prevented from getting city permits to improve their property beyond a certain dollar amount.

We are not at the water's edge, yet still the city council wants to flood our neighborhood! This is outrageous and we will vote out council member who votes for this plan!

I think city staff and the consultants have an obligation to explain to the public that this kind of thinking misunderstands the content, process, and requirements of the plan, so that citizens like me are not forced to try to explain to fellow citizens why their misunderstanding of the plan is wrong.

Peter Loeb

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O'Connor, Bonny

From: Stephanie Dudum <[REDACTED]>
Sent: Thursday, August 30, 2018 5:01 PM
To: Sea Level Rise
Subject: Objection To Managed Retreat

1 | It does not serve owners, renters or visitors to have a managed retreat area. Do not change the zoning in this area.

Sent from my iPhone

**SAN FRANCISCO
PUBLIC GOLF ALLIANCE**



█ Masonic Ave., San Francisco, CA 94117 • █.org

August 28, 2018

Pacifica City Planner Lisa Wehrmeister
Pacifica City Manager Kevin Woodhouse
170 Santa Maria Ave.
Pacifica, CA. 94044

The Draft Final Sea-Level Rise Adaptation Plan is unclear, unfactual, and untrustworthy. Its lack of transparency does not meet requirements of the underlying Request for Proposals and Approach and Scope of Work. The cost-benefit analysis skews in favor of managed retreat by overvaluing beach recreation (without supporting beach data), while undervaluing the onshore coastal resources protected by the seawalls.

Dear Ms. Wehrmeister and Mr. Woodhouse,

San Francisco Public Golf Alliance, representing over 6,500 public course golfers and their friends and families – including a substantial number of Pacifica residents – submits this analysis of the Draft Final Sea-Level Rise Adaptation Plan, dated July 2018.¹

I. The Draft Final Plan does not meet the basic transparency requirements for “in-depth analysis” and “detailed cost-benefit analysis” found in Pacifica’s underlying Request for Proposals and ESA’s own Approach and Scope of Work agreement.

The Draft Final Plan arises out of the Request for Proposals for Professional Consultant Services for Draft Local Coastal Plan Update, issued by the Pacifica City Council and dated June 28, 2017. Among other things, this underlying Request for Proposals requires the Consultant to develop a sea-level rise adaptation plan based on “an in-depth assessment of the costs and benefits. . . including costs and benefits related to recreational and ecological values of beaches and other coastal resources. . .”, and to deliver, among other things, a “detailed cost-benefit analysis for strategies”² In response, ESA, Inc. generated its “Approach

¹ ESA, Inc., Final Draft Sea Level Rise Adaptation Plan, Pacifica CA, July 2018
<http://www.cityofpacific.org/civicax/filebank/blobdload.aspx?t=71473.05&BlobID=14414>

² Request for Proposals, Professional Consultant Services, Draft Local Coastal Plan Update, City of Pacifica, June 28, 2017: <https://drive.google.com/open?id=1rTQvtnsKKI2RXuUXThTu4gDqp95l6Bpo>, at page. 5.1, top half of the page (Packet Pg. 187):

and Scope of Work,” dated July 24, 2017 which accepted the terms of the Request for Proposals.³

But throughout the Final Draft Plan and its cost-benefit analysis, ESA consistently and systematically fails to meet the transparency requirements inherent in the Request for Proposals’ demands for “in-depth” evaluation and “detailed cost-benefit analysis”. The Consultant does not show its work or its calculations, and does not chart or otherwise disclose detailed descriptions of the assets it evaluates, or the values placed on these assets.

The Cost-Benefit Analysis, Section 5.4, starting at page 68, presents a set of colored bar graphs (Figures 17-23) and corresponding charts (Tables 16-31) which report the cost-benefit analysis for three sea-level rise scenarios for each Pacifica coastal sub-area, from West Edgemar/Pacific Manor in the North to Pedro Point/Shelter Cove in the south. But the graphs and charts show no detail – no individual assets are identified or scheduled or valued -- , not even the largest and most prominent asset in each area. So no hotel or business or homeowner, and no governmental entity, can identify a property and validate whether her home or his business or its hotel or park or school or golf course or sewage treatment plant is identified and correctly valued. This problem is described by golf appraiser Gene Krekorian, who upon review of ESA’s cost-benefit analysis could not find ESA’s bottom-line valuation number for Sharp Park Golf Course, and could not tell whether ESA’s cost-benefit analysis treats Sharp Park as a governmental property asset or values golf as a recreational “service”, or both.⁴

This is cost-benefit analysis through a glass darkly. It is not transparent, and does not meet any reasonable definition of the “detailed cost-benefit analysis” required by Pacifica’s underlying Request for Proposals.

II. A couple of important details: (1) the 2050 horizon, and (2) the Coastal Commission’s retained permitting jurisdiction at the Sharp Park levee; and a couple of incidental questions.

At page 8, Table 1, the Final Draft Plan charts the risks of sea level rise by the year 2050 as a 1-in-6 chance (17%) of a 1-foot rise, and a 1-in-200 chance (0.5%) of a 2-foot rise. (The chart doesn’t make clear, and the Draft Final Report doesn’t say, whether these projections are for the California coast generally, or are specific to Pacifica.) Table 1 shows significantly higher sea-rise levels by 2100, but ESA recommends using the 2050 time frame for planning purposes, because “given the level of uncertainty surrounding climate change and sea-level rise, the study authors urge caution in interpreting estimates after 2050.” (Page 68.)

In the Coastal Commission’s November 8, 2017 decision approving coastal development permit No. 2-17-2070 for San Francisco’s partially-armored levee at Sharp Park⁵,

³ ESA, Approach & Scope of Work for Pacifica Draft Local Coastal Plan Update, July 24, 2017, at Page 2-1, pgh. 1 (Packet Pg. 254): https://drive.google.com/open?id=17oKm2pyH6VRI4K-UT1GH_zcNBGKbmgWa

⁴ Letter, Gene Krekorian, Pro Forma, Inc. to Richard Harris, San Francisco Public Golf Alliance, Aug. 27, 2018 <https://drive.google.com/open?id=1z9UzMvNyENpN9yMzGxOFurWdgJNFWfAJ>

⁵ California Coastal Commission, Coastal Development Permit No. 2-17-0702, Dec. 13, 2017: <https://drive.google.com/file/d/1p0QqR5MfVzoEayj2e7zPXHBEpDKtBhTw/view?usp=sharing> Staff Report, at page 4 (by approving the application, the Commission adopted the Staff Report’s Findings).

the Commission made several key determinations: (1) The Sharp Park levee, wetlands, and seaward portions of the golf course come within the Coastal Commission's own retained permitting jurisdiction⁶; (2) the levee is necessary to protect the golf course, flood control infrastructure, and the endangered San Francisco garter snake and California red-legged frog populations in Sharp Park's wetlands⁷; and (3) ***managed retreat is not a feasible alternative at the Sharp Park levee.***⁸

2 (Cont.)

A couple of questions about the "Adaption Overview Sheet" for the Sharp Park-West Fairway Park-Mori Point sub-area, found at the Draft Final Report's Appendix C. First, why does the fine-print "sub-area asset exposure table" continue to show no California red-legged frog and no San Francisco garter snake habitat? This is obviously untrue – as stated in Pacifica's current (1980) Local Coastal Plan, and the Coastal Commission decision in the Sharp Park levee case. Second, there is no "Beach Width Over Time" chart for the beach at the Sharp Park Golf Course. Is there a reason for this? Does the Consultant have such a chart? Will a Sharp Park Golf Course beach width chart be added?)

⁶ California Coastal Commission, Staff Report, Oct. 27, 2017, *Id.*, at page 16, "Standard of Review":

<https://drive.google.com/file/d/1p0QqR5MfVzoEayj2e7zPXHBEpDKtBhTw/view?usp=sharing>

"The proposed project is located along the seaward boundary of a public golf course along the shoreline in the City of Pacifica, which has a certified Local Coastal Program (LCP). However, the proposed project involves development within an area of **the Commission's retained permitting jurisdiction because development is proposed in an area that is defined as former tidelands**, submerged land or land subject to the public trust (i.e., **Sharp Park is an area that was historically filled prior to the Coastal Act, but is still considered former tidelands for CDP permitting purposes**)."

⁷ California Coastal Commission, Staff Report, Oct. 27, 2017, *Id.*, at page 20:

<https://drive.google.com/file/d/1p0QqR5MfVzoEayj2e7zPXHBEpDKtBhTw/view?usp=sharing>

"If the berm were to be removed, it would be expected that the Golf Course and its attendant development would be damaged and lost to storms and erosion in the very short term, as soon as winter storms this year. In addition, such an alternative would also result in significant risk to Sharp Park's biological resources and loss of access to infrastructure at the pumphouse, which is needed to control floodwaters in Sharp Park and in turn maintain playable greens and golfing infrastructure. In fact, the USFWS BO requires the Applicant to maintain a berm because the only vehicle access to the pumphouse infrastructure, which is used to manage floodwaters in the Golf Course is via the top of the berm along the publicly used accessway. The 2012 BO also reports that absent a functioning shoreline protective device at the project site, the SFGS and CRLF habitat in Laguna Salada and Horse Stable Pond wetlands will be compromised." (p. 20)

⁸ California Coastal Commission, Staff Report, Oct. 27, 2017, *Id.*, at page 21-22:

<https://drive.google.com/file/d/1p0QqR5MfVzoEayj2e7zPXHBEpDKtBhTw/view?usp=sharing>

"The 'managed retreat alternative' would, like the 'no project' alternative, result in removal of the berm in its entirety and would eventually return the area currently occupied by the berm footprint to its natural topography. . . . Although the 'managed retreat' alternative provides the opportunity for evaluation and possible long-term relocation of existing structures at the Sharp Park complex that are at risk of coastal hazards, this alternative is currently infeasible because it would be extremely costly (estimated in the tens of millions of dollars) and it is unclear if a golf course could even be relocated inland at this location. In addition, it is infeasible due to the mandates the Applicant is under to protect existing habitat for the CRLD and the SFGS. . . . Therefore, the non-armoring solutions in this case are not currently feasible alternatives at this time." (pp. 21-22)

III. The Cost-Benefit Analysis completely lacks factual and legal support for its beach recreation valuations: the \$40 “day-at-the-beach” value lacks any factual basis; Is not endorsed or adopted by the Coastal Commission; and except for Linda Mar the Plan lacks any supporting Pacifica beach use data.

A. The \$40 Day-at-the-Beach” is a reach too far: unsupported by data or By the Coastal Commission.

The “Beach Recreation” subsection (Final Draft Plan, pages 63-64) , states that “economists measure the value of these non-market resources [including beach recreation] by estimating what consumers would be willing to pay (WTP) for the services.”⁹ A beach recreation “Willingness to Pay” study was conducted in 2008-2009 by the City of Solana Beach, described in a Coastal Commission Staff Report as follows:

“The City estimated the beach day use value using the travel cost method. This method determines the value of a beach day visit based upon estimates of the adult visitors’ travel expenses to get to and from the beach plus the value of the adult visitor’s travel time, based upon income. Input data for the City’s beach day use value came from a total of 563 surveys of adult beach users on 34 randomly selected days and times over the period of one year between July 23, 2008, and ending on July 31, 2009. The survey asked beach users how long they planned to use the beach that day, their primary activity at the beach, the mode of transportation to get to the beach, the number of people who traveled together, the distance traveled to get to the beach, the beach users home zip code, the number of days per month the beach user went to the beach, income, occupation, age, sex, and age and number of children. . . . The City then used the mode of transportation, the distance traveled, and the annual individual salary to determine the average cost of a trip to the beach. The City used this data in a standard travel cost analysis to quantify the value of a day at the beach. The travel cost method assumes that the farther people will travel to get to the beach and the more they pay for this travel, the higher the value that is placed on the beach visit.”¹⁰

No Pacifica “willingness to pay” study is referenced in the Final Draft Plan, apparently because no such Pacifica study exists. Instead, the Final Draft Plan states that it “applies a day use value of \$40 “ and claims – incorrectly – that “this valuation is consistent with a recent case before the Coastal Commission in Solana Beach,” and then – misleadingly -- cites a purported Coastal Commission report for the proposition that the \$40-per-day is “based on numerous studies of the non-market value of beaches in California.”¹¹

⁹ ESA, Inc., Final Draft Sea Level Rise Adaptation Plan, at page 65
<http://www.cityofpacific.org/civicax/filebank/blobdload.aspx?t=71473.05&BlobID=14414>

¹⁰ City of Solana Beach LCP Amendment, LCP-6-SOL-16-0020-1, May 11, 2017, Coastal Commission Staff Report, Apr. 28, 2017, Page 46: <https://documents.coastal.ca.gov/reports/2017/5/th17d/th17d-5-2017-report.pdf>

¹¹ ESA, Inc., Final Draft Sea Level Rise Adaptation Plan, at page 65
<http://www.cityofpacific.org/civicax/filebank/blobdload.aspx?t=71473.05&BlobID=14414>

But this just repeats mistaken claims from ESA's prior May 4, 2018 memo to Pacifica, "Methodology for Economic Analysis of Sea Level Rise Hazards for Pacifica, etc."¹²

In fact, the Coastal Commission in the Solana Beach case did not adopt a statewide \$40 "day-at-the-beach" value, but rather specifically rejected a statewide number, and approved instead Solana Beach-specific values, based on Solana Beach's own study of its beachgoers, as discussed above, of "\$35.56 in the summer months and \$21.00 in the non-summer months"¹³ (that is, a year-round average of about \$25 per day – not \$40). And the purported Coastal Commission report – "Improved Valuation for Impacts to Recreation, Public Access, and Beach Ecology from Shoreline Armoring," was never finalized, but instead is stamped "Administrative Draft," and dated September 28, 2015.¹⁴ That report was not approved by Commission Staff because the report relies solely on Southern California beach studies, which Commission Staff could not agree were applicable to Northern California beaches, where the weather, surf conditions, water temperature, and visitor profiles are different from Southern California beaches. All of this is detailed, with extensive citation to original source documents and to the relevant Coastal Commission proceedings and decisions, at pages 2-4 of the San Francisco Public Golf Alliance's June 8, 2018 letter to City of Pacifica officials, captioned "The Economic Methodology Memo is unreliable, etc.,"¹⁵ which letter is appended hereto as Exhibit A, and fully incorporated herein by this reference.

Significantly, a well-known 2004 beach valuation study co-authored by ESA's economist Dr. Philip King, points to the general differences between Northern California's cold-water, cold-weather, undertow-prone beaches and Southern California's stereotypically broad, sunny, warm-water, swimming-friendly tourist-magnet beaches, which make a uniform statewide beach-use valuation inadvisable.¹⁶ Describing choice of beaches for their 2004 study, Dr. King and co-author Douglas Symes reported:

We also decided to exclude beaches in northern California which are not suitable for swimming and thus do not attract the type of vacationers and day-trippers that beaches to the south do. We believe visitors to San Francisco's beaches and

¹² ESA, Inc., Memorandum, "Methodology for Economic Analysis of sea Level Rise Hazards for Pacifica Sea Level Rise LCP Update," May 4, 2018:

<http://www.cityofpacific.org/civicax/filebank/blobdload.aspx?BlobID=14133>

¹³ Letter, Coastal Commission, San Diego Area, to Solana Beach City Manager Greg Wade, May 24, 2017, notifying city of the Commission's certification order in the Solana Beach LCP case, LCP-6-SOL-16-0020-1:

<https://drive.google.com/open?id=15VL7KILxfimGvABvjM-hVjJQHbO5Rj-5>

See attached "Suggested Modifications," at first unnumbered page (showing rejection of uniform statewide rate)

¹⁴ California Coastal Commission, Improved Valuation for Impacts to Recreation, Public Access, and Beach Ecology from Shoreline Armoring, Administrative Draft, dated September 28, 2015:

<https://drive.google.com/open?id=1TpFmEXLdHr9EnzgcHQgA3CELX7zg-MT->

But as its title shows, this was only a Draft, and was never approved by the Commission or by Commission Staff.

¹⁵ Letter, June 8, 2018, San Francisco Public Golf Alliance to Pacifica City Planner Tina Wehrmeister and City Manager Kevin Woodhouse, "The Economic methodology Memo is unreliable, etc.," at pp. 2-4, fns. 3-17:

<https://drive.google.com/open?id=1xtAbR562iciLq7NGqfjcyd1C4tZII5s>

¹⁶ King, Philip, and Symes, D., "Potential Loss in GNP and GSP from a failure to Maintain California's Beaches," Shore and Beach, Fall, 2004: https://drive.google.com/open?id=1MIC2QvIA7if_2XsDjGZQF5TLjnvxRhUy

beaches in Marin County and farther north are much less likely to go abroad if beaches ceased to exist.¹⁷

. . . beaches on the north coast, in particular those in or north of San Francisco are qualitatively different from beaches on the Central and Southern California Coast. In particular the water is generally too cold to swim, and many Northern California beaches are subject to dangerous currents that make swimming impossible. While tourism still plays a significant role at many of these beaches, and surfing is especially popular at a number of Northern California beaches, **we decided to exclude these [Northern California] beaches from our estimates since we cannot conclude with confidence that visitor behavior at these beaches will be similar to Southern and Central California beaches.** ¹⁸ (emphasis added)

3 (Cont.)

Coastal Commission staff's non-adoption of the "\$40-a-day" now promoted by Dr. King is the subject of an interesting May 16, 2018 e-mail exchange in which Coastal Commission environmental scientist Mary Matella reminds Dr. King that Commission Staff "have not gotten to the point of staff agreement on recommended methods for all beaches. . . The north/south divide has been a concern for some staff who anticipate that northern beaches will be undervalued." To this, Dr. King responds: "I believe we should have the same value per beach day for all beaches in California for a variety of reasons. . . I plan to use \$40 a day in Pacifica. I think the fact that a) there are many surfers, b) **there are few substitutes**, means we can make a strong case for the \$40/day figure. . . **So this could be a good test case.**" (emphasis added)¹⁹

B. There is no beach use data for any Pacifica beach other than Pacifica State Beach

In the concluding paragraph of its Cost-Benefit analysis, ESA concedes: "One area where data was very limited was beach recreation, except for Pacifica State Beach."²⁰ Because there is no beach attendance data for Sharp Park and all other beaches except Pacifica State Beach, ESA "used **estimates** from the Coastal and Regional Sediment Master Plan"^{21, 22}. (emphasis added) But that prior ESA-authored document (the "Draft CRSMP") was the subject of extensive critical public comment, including from the cities of Pacifica and

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¹⁷ King and Symes, *id.*, at page 29: https://drive.google.com/open?id=1MIC2QvIA7if_2XsDjGZQF5TLjnvxRhUy

¹⁸ King and Symes, *id.*, at page 21: https://drive.google.com/open?id=1MIC2QvIA7if_2XsDjGZQF5TLjnvxRhUy

¹⁹ E-mail exchange, May 16, 2018, between Mary Matella and Philip King:

<https://drive.google.com/open?id=1eATEMEUJJPQpE64NK0tPSfDErIKkfbJp3>

This correspondence was produced by the City of Pacifica, in response to a California Public Records Act request.

²⁰ ESA, Inc., Final Draft Sea Level Rise Adaptation Plan, Pacifica CA, July 2018, at page 87:

<http://www.cityofpacificacalifornia.org/civicax/filebank/blobdload.aspx?t=71473.05&BlobID=14414>

²¹ ESA, Inc., Final Draft Sea Level Rise Adaptation Plan, *id.*, at page 65

<http://www.cityofpacificacalifornia.org/civicax/filebank/blobdload.aspx?t=71473.05&BlobID=14414>

²² Environmental Science Associates (ESA), 2015, San Francisco Littoral Cell Coastal Regional Sediment Management Plan, for US Army Corps of Engineers and Coastal Sediment Management Workgroup,

http://www.sfestuary.org/wp-content/uploads/2015/11/Draft_SFLC_CRSMP_20160104.pdf;

San Francisco, and it remains today in draft form, having never been finalized. Pacifica Planning Department stated in Appendix E to the Final Draft Plan, “Responses to Comments on Draft Vulnerability Assessment,” that “**the draft Coastal Regional Sediment Management Plan and its results are not being directly relied upon for the City’s [Sea Level Rise Adaptation] study.**”²³ So those beach attendance estimates from the Draft CRSMP should not be used by ESA’s cost-benefit analysis in lieu of facts.

This absence of Pacifica beach use data is discussed in detail at pages 5-7 of the San Francisco Public Golf Alliance’s June 8, 2018 letter to Pacifica Officials²⁴, which letter is attached hereto as Exhibit A and incorporated fully herein by this reference. Although ESA represented to the City of Pacifica in ESA’s July 24, 2017 “Approach and Scope of Work” agreement that “Dr. King already has data on beach attendance and valuation from the Coastal Regional Sediment Master Plan,”²⁵ neither Dr. King nor Pacifica has ever been able to produce the paltry “evidence” – four alleged days of San Francisco State student-conducted Pacifica beach-counts in February, 2014 – that serve as the purported factual underpinning for the Pacifica beach attendance figures reported by ESA in the Draft CRSMP.²⁶ By letter dated August 27, 2018 from Pacifica Acting City Clerk Sarah Coffey in response to a public records act request, the city acknowledged that it and Dr. King have looked for, but have not found the alleged 2014 student-conducted beach use surveys.²⁷

Internal e-mail correspondence between Dr. King and other ESA staff shows they have been aware of this lack of Pacifica beach use data – which Dr. King calls a “**huge** issue” -- since at least November 2017, but have failed to find old studies or to conduct new ones in support of beach use or beach recreation value claims in Pacifica.²⁸

²³ “Responses to Comments on Draft Vulnerability Assessment, Appendix E to Final Draft Pacifica Sea Level Rise Vulnerability Assessment, Response to Recurring Question 7, at Appendix E, page 12
<http://www.cityofpacific.org/civicax/filebank/blobdload.aspx?t=67369.96&BlobID=14459>

²⁴ Letter, June 8, 2018, San Francisco Public Golf Alliance to Pacifica City Planner Tina Wehrmeister and City Manager Kevin Woodhouse, “The Economic methodology Memo is unreliable, etc.,” at pp. 2-4, fns. 3-17:
<https://drive.google.com/open?id=1xtAbR562iciLq7NGqfjcqyd1C4tZII5s>

²⁵ ESA, Approach & Scope of Work for Pacifica Draft Local Coastal Plan Update, July 24, 2017, at Page 2-7 (Packet Pg. 254): https://drive.google.com/open?id=17oKm2pyH6VRI4K-UT1GH_zcNBGKbmgWa

²⁶ See the detailed discussion of this search for backup data, reported in our Letter, June 8, 2018, San Francisco Public Golf Alliance to Pacifica City Planner Tina Wehrmeister and City Manager Kevin Woodhouse, “The Economic methodology Memo is unreliable, etc.,” at pp. 5-6, fns. 19-27:
<https://drive.google.com/open?id=1xtAbR562iciLq7NGqfjcqyd1C4tZII5s>

²⁷ Letter, Pacifica Acting City Clerk Sarah Coffey to Richard Harris, Aug. 27, 2018:
<https://drive.google.com/open?id=1t056hiwxK7mLOGWlrf-VgznMzzX4iiNV>

²⁸ E-mail, Nov. 15, 2017, Phil King to ESA’s James Jackson, cc. ESA’s Bob Battalio: “Beach and coastal attendance is going to be a **huge** issue so the more data/opinions we have the better.” (emphasis in original)
<https://drive.google.com/open?id=1eATEMEUJQPpE64NK0tPSfDerlKkfbJp3>. This e-mail was obtained from the City of Pacifica in response to a public records act request.

IV. The Final Draft Plan's cost-benefit analysis for the Sharp Park- West Fairway Park-Mori Point subarea appears to substantially undervalue the coastal resources and assets on the landward side of the seawalls and berm.

The Coastal Commission's November 8, 2017 ruling granting San Francisco a coastal development permit for the partly-armored Sharp Park berm, specifically identified the golf course, the endangered species and their wetland habitat in the Laguna Salada wetlands, and the Coastal Trail atop the berm as coastal resources, and ordered San Francisco to maintain and improve the berm to protect these assets – along with the surrounding residential neighborhoods. The Commission additionally ordered San Francisco to build trail improvements.²⁹

But the Draft Final Plan refuses and fails to place economic values on the wetlands or on the endangered species or on the Coastal Trail and its walkers. So the values of these assets are not counted in the ESA "cost-benefit analysis".³⁰ If they were counted, they would far exceed the Draft Final Plan's projected engineering costs for coastal protection.³¹

4 (Cont.)

At the golf course, the SF Golf Alliance's golf evaluation expert, Gene Krekorian, has determined a reasonable present value of the golf course to be \$31.5 Million (for the 2050 time frame), based on the costs-of-operation figures supplied in the Final Draft Plan's Appendix G. Mr. Krekorian has also determined the separate "recreational value" of coastal public golfing at Sharp Park to be \$36.7 Million.³²

The Final Draft Plan's cost-benefit analysis for Sharp Park, as reflected in the colored-bar chart of Figure 20 (at page 75) and the "Detailed Breakdown" Table 22 (at page 76), does not appear to place any substantial value on the golf course property – nothing remotely close to the values identified by golf appraiser Gene Krekorian.³³ This can be seen in the total of the "erosion losses" and "flooding damages" which Table 22 charts for the managed retreat alternative (Alternative 3) for the 2050 time frame is \$44 Million for the entire sub-area –

²⁹ California Coastal Commission Staff Report, Oct. 27, 2017, CDP Application No. 2-17-0702, at page 2 [Application No. 2-17-0702 \(San Francisco Recreation and Parks Department, Pacifica\)](#)

³⁰ ESA, Inc., Final Draft Sea Level Rise Adaptation Plan, *supra.*, at page 86 <http://www.cityofpacific.org/civicax/filebank/blobdload.aspx?t=71473.05&BlobID=14414>

³¹ See Letter, June 8, 2018, San Francisco Public Golf Alliance to Pacifica City Planner Tina Wehrmeister and City Manager Woodhouse, "The Economic methodology Memo is unreliable, etc.," at pp. 10-12: <https://drive.google.com/open?id=1xtAbR562iciLq7NGqfjcyd1C4tZlI5s>; and Letter, San Francisco Public Golf Alliance to Pacifica City Planner, etc., May 3, 2018, at pages 2-4: <https://drive.google.com/open?id=1LZ3hornR93lyptgeCiiUL1pOJpCH1kWa>

³² Letter, Gene Krekorian, Pro Forma, Inc. to Richard Harris, San Francisco Public Golf Alliance, Aug. 27, 2018: <https://drive.google.com/open?id=1z9UzMvNyENpN9yMzGxOFurWdgJNFWfAJ>

³³ Mr. Krekorian's valuation of the coastal "recreational value" of golf at Sharp Park is likely substantially higher than whatever value ESA's economist Dr. King placed on it, because Mr. Krekorian evaluated Sharp Park as a public golf course on in the Coastal Zone, while the comparables used in Dr. King's Appendix G – are inland golf courses far removed from San Francisco and the North Peninsula. And whereas Dr. King used just one year's play figures, Mr. Krekorian used a higher number, being the average reported golf play over the past five years. Letter, Gene Krekorian, *id.* p. 3: <https://drive.google.com/open?id=1z9UzMvNyENpN9yMzGxOFurWdgJNFWfAJ>

governmental property, residences, businesses, and all. So the cost-benefit analysis is substantially undervaluing something here -- the golf course, everything else. Likely both.

4 (Cont.)

CONCLUSION: The cost-benefit analysis skews in favor of managed retreat by overvaluing beach recreation -- without supporting beach data, while undervaluing the onshore coastal residences, businesses, and resources protected by the seawalls.

Respectfully submitted,

San Francisco Public Golf Alliance

Richard Harris

Richard Harris, President

Exhibit A

Letter, San Francisco Public Golf Alliance to Pacifica Planning Director, etc., June 8, 2018
<https://drive.google.com/open?id=1xtAbR562iciLq7NGqfjcqyd1C4tZII5s>

cc:

Pacifica City Council
Pacifica Public Works Department
Bonny O'Connor, Assistant Pacifica Planner
San Francisco Recreation and Park Department
Congresswoman Jackie Speier
State Senator Jerry Hill
Assemblyman Kevin Mullin
San Mateo County Board of Supervisors
California Coastal Commission, North-Central Coast District
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Bo Links