

From: Joanne Gold <joannegold@yahoo.com>
To: o'connorb@ci.pacifica.ca.us <o'connorb@ci.pacifica.ca.us>
Cc: Jeannine.Manna@coastal.ca.gov <jeannine.manna@coastal.ca.gov>; julia.koppmannorton@coastal.ca.gov <julia.koppmannorton@coastal.ca.gov>; murdockc@ci.pacifica.ca.us <murdockc@ci.pacifica.ca.us>; [Stephanie@Coastal Rexing](mailto:Stephanie@CoastalRexing.com) <stephanie.rexing@coastal.ca.gov>
Sent: Thursday, January 2, 2020, 09:50:29 PM PST
Subject: CCC review & comment on proposed draft update to the Pacifica Local Coastal Program (LCP) Land Use Plan (LUP)

Dear Pacifica City Council and City Planning Department;

I am writing in my capacity as President of the Pedro Point Community Association (PPCA) regarding the LCP comment letter submitted by the California Coastal Commission (CCC) to the City of Pacifica on 11/22/19. I would like to point out that many of the CCC's comments support concerns that the PPCA has expressed related to the land use designation of the Calson field, as a matter of public record.

For your convenience, to follow are several examples of CCC recommendations from that letter that are in alignment with PPCA statements*:

* We are incorporating by reference all prior PPCA communications on this issue since 2006

CCC LCP/Land Use Comment Ltr. Recommendation:	Correlation with PPCA public record statements:
Redesignate areas with severe development constraints to the Conservation land use designation	PPCA supports designating the Calson Field as either Low Intensity Visitor-Serving Commercial (LIVC) or Conservation (C), based on existing Sea Level Rise and tsunami evacuation zone data cited in Pacifica Draft GPU – DEIR
Add up-to-date neighborhood-specific traffic, hazard, visual character, and coastal planning constraints as outlined in the 1980 version of the LUP	PPCA documented significant negative impacts of recent development resulting in increased street run-off/frequent flooding, increased vehicular traffic, pedestrian safety hazards, and obstructed access for emergency vehicles due to street parking volume
	PPCA has submitted more than 8 documented coastal act conflicts with the proposed CRMU land use designation of the Calson Field
Include further detail about sites with known development constraints	PPCA maintains that the draft LCP/LUP recommendations fail to provide any reasonable justification for a proposed change to CRMU. We've submitted expert environmental and legal opinion indicating that changing the land use to CRMU is reasonably likely to cause direct and indirect significant impacts which have not been adequately analyzed and do not consider reasonable alternatives that are environmentally superior and consistent with Coastal Act policies.
Prohibit increases in density of land use in hazard and sensitive resource areas	Current GPU DEIR map shows the Calson Field as a Tsunami Evacuation Area. In its existing undeveloped state, no evacuations are needed under present conditions. If there is NEW DEVELOPMENT in an area mapped as a TSUNAMI EVACUATION AREA, there is potential for significant hazardous impact.
	Existing access into and out of this area is severely limited. More development in the path of a tsunami evacuation area means more evacuating vehicles on the road, more vulnerable infrastructure.
	A March 2019 Coastal flood model by The U.S. Geological Survey (Pacific Coastal and Marine Science Center) of recent extreme weather occurrences specific to the Pedro Point Field area indicate: "Our results demonstrate that many sensitive areas may be overwhelmed

during storm conditions combined with small amounts of SLR expected within just a few decades”

If Pacifica aspires to be a city where our unique coastal environment is truly our economy, City Council and Planners must prioritize coastal land use decisions that will enrich eco-tourism interests and environmental protection whenever possible. While the private landowner of the Pedro Point (Calson) field is entitled to make economic use of his property, the city should not change land use solely to increase real estate profitability of a single landowner to the exclusion of all else.

The General Plan update must comprehensively envision Pacifica’s future and craft the process for how to achieve that vision for the long-term benefit of the entire community – not just for the benefit of a single land owner. Please do what’s best for our city’s future by heeding the recommendations of the CCC and by rejecting any type of residential land use designation for the Calson field.

Sincerely,

Joanne Gold
PPCA President
c: 650-270-8574
251 Stanley Ave., Pacifica

PS: We also believe that due to time constraints, the coastal commission may have overlooked an intended edit for Hazard Policy 66 (Tsunami Hazards). It is likely that they intended it to be consistent with the edited language recommended for Hazard Policy 62 (Flooding) ie: “New development in flood hazard zones shall be avoided...” rather than “New development shall consider and minimize risks...”