



PEDRO POINT COMMUNITY ASSOCIATION

March 7, 2022

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Christian Murdock, AICP
Deputy Director of Planning
City of Pacifica Planning Department
540 Crespi Drive
Pacifica, CA 94044
Via email: publiccomment@pacifica.gov

RE: Comments on City of Pacifica General Plan Update (GPU) and 2022 Draft EIR
(SCH:2012022046)

Dear Mr. Murdock:

I am writing in my capacity as President of the Pedro Point Community Association (PPCA), a neighborhood-based, all-volunteer nonprofit organization that serves as a strong and well-informed voice for the entire Pedro Point community and actively seeks to represent the expressed opinions and desires of its residents.

The PPCA is submitting the following comments on the City of Pacifica's January 2022 Draft General Plan Update (GPU) and Draft Environmental Impact Report (DEIR). Our comments incorporate by reference the GPU/DEIR comment letters prepared on our behalf and submitted under separate cover by CEQA consultant Richard Grassetti, our attorney Brian Gaffney, and attached memo from consulting Coastal Ecologist, Dr. Peter Baye (Exhibit A).

Land use designations are the heart of the General Plan, as a guiding document for the city's development and policy making decisions. That is why the purpose of this letter is to clearly state that **the PPCA emphatically objects** to the GPU and DEIR's proposed land use designation change to "Coastal Residential Mixed Use" (CRMU) **for the undeveloped San Pedro Avenue site** in Pedro Point (locally referred to as the **Pedro Point field**).

It should be noted that the PPCA made similar objections to this same CRMU designation change when it was proposed in a previous draft GPU and DEIR released for public comment in 2014, but never approved.

For decades, the PPCA has made extensive efforts to collect residents' input to inform city planners about our community's preferences for land use and development, and the value that is placed on maintaining our community's environmental assets and natural aesthetics to ensure harmony with the scale and character of existing neighborhood conditions. (These efforts and preferences have been well documented and are on record with the City of Pacifica, as well as on the PPCA website at www.pedropoint.org.)

Based on residents' continued input and support, the PPCA previously urged the City to revise the proposed land use for the Pedro Point Field site in the GPU and DEIR to be designated as either "Low-Intensity Visitor-Serving Commercial" (LIVC) or "Conservation" (C). However, due to more recent evidence presented in CDP application 2-19-0026 related to the adjacent property's ESHA and hazards identification (which - under state law - development would be a nuisance) **it now appears that only the designation of "Conservation" (C) should be applied.**

Pedro Point residents have consistently registered strong preference for maintaining the existing open space of the Pedro Point field and opposition to any residential development, due to a number of expressed negative impacts. In its current existing state, the field is an open space with seasonal wetlands.

It should be noted that **reasonably foreseeable development under the proposed CRMU land use designation** for the Pedro Point field would result in:

- 1. Significant adverse aesthetic impacts.** (see Exhibit B) Natural environmental beauty is an integral part of the existing visual character of our small coastal Pedro Point community. Generations of residents have treasured the scenic environment of the field which affords unique views of the surrounding hillsides and provides an open space that serves as a park-like setting for residents and visitors. The proposed CRMU designation would have a substantial adverse effect on scenic vistas, substantially degrade the existing visual character of the neighborhood, and create new source of substantial light and glare which would adversely affect views.
- 2. Significant adverse biological impacts.** (see Exhibit B) The development flowing from the CRMU designation would diminish an environmentally sensitive wildlife habitat. Neighbors have long-enjoyed sightings of many species of birds, animals and reptiles that inhabit the field, including documented photos of endangered species such as the California Red-Legged Frog (CRLF). The opportunities for wildlife encounters with diverse species found in and around the field have become an essential part of our neighborhood identity.
 - a. NOTE: The City was also recently made aware from the denial of CDP application 2-19-0026 dated 12/7/2020 that the adjacent unnamed watercourse to this property has been identified as ESHA by CA Dept. of Fish & Wildlife, the US Fish and Wildlife Service, and Senior Biologist Dr. Garske-Garcia of the California Coastal Commission (CCC), and that the CRLF require a minimum 300-foot foraging buffer zone. In addition, CCC found the watercourse likely also supports several other species as a habitat corridor. Coastal Act Section 30240 prohibits non-resource dependent development within an ESHA.
- 3. Significant adverse traffic impacts.** (see Exhibit B) With San Pedro Avenue serving as the only single-lane road in and out of the Pedro Point neighborhood, the increased traffic volume, congestion, and vehicle miles travel generated by CRMU-related residential development in the field would make this main thoroughfare un-navigable, and present significant adverse hazards for emergency access or evacuation. This increased traffic would also have related air quality and GHG impacts.
- 4. Significant adverse transportation, air quality and GHG impacts.** Our narrow streets are already choked with parked cars from increased commercial, residential and beach tourism parking demands. Increased parking generated by scores of CRMU-related residential units and visitors would result in excessive congestion and overwhelm on-street parking in our already overburdened neighborhood, and further exacerbate the transportation, air quality and GHG impacts.
- 5. Increase pedestrian safety hazards.** (see Exhibit B) Increased street parking and vehicular traffic along San Pedro Avenue where there are no sidewalks or crosswalks would obstruct the only pedestrian routes,

creating significant adverse safety hazards for pedestrians and emergency vehicles, and put residents (and pets) increasingly at risk.

- 6. Significant adverse flooding impacts.** (see Exhibit B) In its undeveloped state, the field serves as a natural catch basin for street run off from the surrounding the community and steep hillsides, and has historically been subject to flooding, occurring as recently as the 2021-2022 rainy season. Residents have also identified above ground, year-round spring percolation in the southwest corner of this property (see Exhibit B). Residential development adding more impervious surfaces would put businesses and homes along San Pedro Avenue at risk for even greater flooding and safety hazards.

Additionally, the CCC has been in communication with the City of Pacifica for more than a decade to express concern about negative impacts of development on the habitats of a watercourse adjacent to the Pedro Point field, which likely would meet the one-parameter definition of wetlands under the Coastal Act. The CCC asked that a one-parameter wetland delineation be conducted. The City denied the request. The CCC has also identified the undeveloped San Pedro Avenue site as potential wetlands. Any development on this field would reduce the biological productivity or water quality of the wetlands due to runoff created by new development, in violation of the Coastal Act.

Comment letters submitted by Pedro Point residents, our environmental and legal experts provide additional specific details how a proposed change of the existing land use of the Pedro Point field to CRMU is reasonably likely to cause direct and indirect significant adverse impacts and would conflict with CEQA and Coastal Act policy. They also document how these impacts have not been adequately analyzed or mitigated in the DEIR. Nor does the DEIR identify any meaningful reasonable alternatives to the proposed CRMU designation that are 1) environmentally superior, 2) consistent with Coastal Act policies, and 3) compatible with the unique coastal character of Pedro Point and conservation of its important remaining open spaces.

Most notably, the GPU Land Use map for the entire City of Pacifica (section 4-6, p. 67) shows the one main property proposed for the new CRMU designation is the privately-owned, undeveloped San Pedro Avenue field. We assert that the GPU should be a guiding document for the development and policy making decisions of the entire community – not just for the benefit of a single landowner.

In conclusion, based on our counsel's review of the law, our experts' opinions - and in order to address the noted DEIR deficiencies as well as be in compliance with CEQA and Coastal Act policies – **the most expedient solution would be to change the proposed land use designation for the Pedro Point field from CRMU to Conservation** (which is most consistent with the current state of the undeveloped property). The PPCA strongly encourages you to consider this option, so that we can all look forward to soon having an updated General Plan that will put Pacifica on the map for being a smart, vibrant, environmentally savvy, jewel of a city.

Respectfully submitted on behalf of the Pedro Point Community Association,



Allison West
PPCA President
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Attachments:

Exhibit A - Memo from Dr. Peter Baye, Coastal Ecologist

Exhibit B - Community Sourced Photos related to CRMU Negative Impacts