

**PEDRO POINT COMMUNITY ASSOCIATION**

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*Via Email and Hand Delivery*

Subject: Pedro Point Community Association comments on Draft Environmental Impact Report for The Pacifica General Plan Update Project – SCH No. #2012022046

Dear Mr. Diaz:

The Pedro Point Community Association (PPCA) is submitting the following comments on the March 2014 Draft Environmental Impact Report (DEIR) for the Pacifica General Plan Update (GPU). Our comments incorporate by reference the GPU DEIR comment letters prepared on our behalf and submitted under separate cover by CEQA consultant Richard Grasseti, biologist Peter Baye, and our attorney Brian Gaffney.

The purpose of this letter is to clearly state that the PPCA objects to the DEIR's proposed land use category of "Coastal Residential Mixed Use" (CRMU) as a change from the existing (1980 General Plan) "commercial" land use designation for the vacant San Pedro Avenue field (also referred to as the Calson Property or Pedro Point field). We strongly urge the City to revise the proposed alternative to designate the land use of the Pedro Point Field site as "Low-Intensity Visitor-Serving Commercial" (LIVC), corresponding with the former category of "commercial-recreation" or to consider a designation of "Conservation" (C).

The DEIR does not provide any reasonable explanation for the proposed change from existing "commercial" land use designation to CRMU. The DEIR fails to consider a reasonable range of alternative land uses for the San Pedro Avenue field that are both consistent with the character of the unique Pedro Point neighborhood, and comply with Coastal Act policies. However, the existing "commercial recreation" zoning is compatible with the existing, "commercial" land use designation, and commercial recreational economic uses of the field would be compatible with the unique coastal neighborhood character of Pedro Point, and conservation of its important remaining open spaces.

As the analyses in our experts' letters show, changing the existing land use (currently vacant open space with wetlands) to residential development (CRMU) is reasonably likely to cause direct and indirect significant impacts which have not been adequately analyzed in the DEIR. The DEIR also does not identify any meaningful, substantial mitigation for the significant impacts of the proposed CRMU designation, or any reasonable alternatives that are environmentally superior, or at least consistent with Coastal Act policies.

Furthermore, for the past several years members of the PPCA (representing our neighborhood community) have continually attempted to work with the City of Pacifica to recommend preferred GPU

Land Use Alternatives for the San Pedro Avenue Field. On August 9, 2011 and February 14, 2013, the PPCA formally submitted documents stating our community's Land Use recommendations (see attachments A and B). We clearly expressed opposition to any form of residential land uses for the Pedro Point field, and endorsed sustainable commercial-recreational land uses that are compatible with open space, tourism, recreation, and a robust visitor-based coastal tourism economy.

These letters were submitted as a result of broad-scale community input, including a **special public community forum** hosted by the PPCA on November 4, 2012 at the recommendation of the City Council. George White, head of the City Planning Department spoke at the forum and the PPCA hired a professional facilitator to ensure the forum was conducted in a fair and unbiased manner to obtain clear and informed community feedback. Please note that PPCA included the property owner, Ron Calson in this forum, and even voted to accept Mr. Calson as a member of the PPCA Board in 2012, in an effort to be fully collaborative and transparent in our on-going community discussions related to the Pedro Point field land use.) **Today, the PPCA still strongly objects to any residential land use for the vacant field, including CRMU.**

It should also be noted that the vision and goals recommended in the GPU for a sustainable economy in Pacifica are "to better leverage its coastal location and establish itself as a more successful tourist destination" (see attachment C) and call for creating "tourist-oriented retail districts... similar to other beachside communities along the Pacific coastline." [GPU section 2 - 9] The Pedro Point field is directly adjacent to Linda Mar State Beach, wetlands and floodplains of San Pedro Creek (including endangered species habitat). It is also adjacent to a coastal visitor-serving commercial center (inclusive of multiple unique restaurants, surf shop, grocery store, pet boutique, etc.). Therefore, low-intensity "visitor-serving commercial" land use is an obvious alternative that the DEIR should have evaluated under CEQA. Only a "Conservation" (C) land use could be environmentally superior and would be a highly attractive option.

In summary, the March 2014 GPU DEIR is grossly inadequate as it pertains to the Pedro Point. It fails to identify significant impacts, mitigation, and reasonable alternatives for the inexplicable CRMU land use proposed for the San Pedro Avenue field. At a minimum, the DEIR must be recirculated for further public review and comment once the flaws in the EIR have been corrected. We urge the City to have such a recirculated EIR address alternative land use recommendations for Pedro Point field that are consistent with Coastal Act policies (especially those regarding wetlands, natural hazards, and coastal recreation), and address PPCA land use recommendations.

However the simplest solution for these CEQA and Coastal Act defects is to change the land use designation for the Pedro Point field from CRMU to Low-Intensity Visitor-Serving Commercial. The PPCA strongly encourages you to consider this option.

Respectfully submitted on behalf of the Pedro Point Community Association,



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Cc: California Coastal Commission