

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.

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."

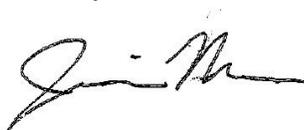
The overarching goal of long-term adaptation planning, as compared to the LCP policies and

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)