



SAN FRANCISCO PLANNING DEPARTMENT

Executive Summary Adoption Hearing Western Shoreline Area Plan Amendment HEARING DATE: JUNE 8TH, 2017

1650 Mission St.
Suite 400
San Francisco,
CA 94103-2479

Reception:
415.558.6378

Fax:
415.558.6409

Planning
Information:
415.558.6377

Date: May 24, 2017
Case No.: **2014.2110CWP**
Staff Contact: Maggie Wenger– (415) 575-9126
Maggie.wenger@sfgov.org
Reviewed by: Chris Kern – (415) 575-9037
Chris.Kern@sfgov.org
Recommendation: Recommend Approval

GENERAL PLAN AMENDMENT

The proposal would amend the Western Shoreline Area Plan, which is both an element of the General Plan and the land use plan portion of San Francisco's Local Coastal Program with the California Coastal Commission. The proposed amendments are designed to address coastal erosion, flooding, and sea level rise hazards in San Francisco's Coastal Zone. The current policies and zoning in the Western Shoreline Area Plan will remain unchanged.

The Way It Is Now:

The Local Coastal Program addresses coastal access, public recreation, transportation, land use, and habitat protection within the Coastal Zone but does not address coastal hazards or sea level rise.

The Way It Would Be:

The proposed amendments will add policies which address coastal hazards including erosion, coastal flooding, and sea level rise. These amendments will support near-term adaptation measures identified in the Ocean Beach Master Plan and in development by the San Francisco Public Utilities Commission, San Francisco Public Works, San Francisco Municipal Transportation Agency, San Francisco Recreation and Parks, and the Golden Gate National Recreation Area.

BACKGROUND

San Francisco's Ocean Beach has been highly modified over the past 150 years, pushing the shoreline as much as 200 feet seaward of its natural equilibrium. These changes began with dune stabilization efforts in the 1860's, followed by the construction of the Great Highway, Esplanade and O'Shaughnessy seawall in 1929, the Taraval seawall in 1941, the Noriega seawall in the 1980's, and riprap revetments south of Sloat Boulevard over the past 15 years. From the late 1970's through 1993, the SFPUC constructed major sewer infrastructure at Ocean Beach, including the Oceanside Treatment Plant south of the Zoo, and the Lake Merced Tunnel and Westside Transport Box beneath the Great Highway. Sand has been placed on the beach since the 1970's, and the northern and middle reaches of the beach are stable, but erosion of

south Ocean Beach has damaged the Great Highway, resulted in the loss of beach parking, and threatens to damage critical wastewater system infrastructure. See Figures 1 and 2 for current shoreline conditions and erosion at South Ocean Beach. Sea level rise and the increased frequency and severity of coastal storms anticipated due to global climate change will likely exacerbate these effects in the decades to come.



Figure 1. Conditions at South Ocean Beach, February 2016.



Figure 2. Eroding shoreline and rubble at South Ocean Beach, February 2016.

For over a decade, the City has explored options for a planning framework to address erosion and coastal access through the Ocean Beach Task Force and the Ocean Beach Vision Council. The San Francisco Planning and Urban Research Association (SPUR), an urban planning nonprofit organization, made substantial progress by completing the Ocean Beach Master Plan in 2012. The Master Plan represents the cooperation and involvement of the City/County and a host of federal, state, and local agencies, as well as community stakeholders in an 18-month planning process addressing seven focus areas: ecology, utility infrastructure, coastal dynamics, image and character, program and activities, access and connectivity, and management and stewardship. The proposed Local Coastal Program amendment integrates portions of the Ocean Beach Master Plan, particularly managed retreat south of Sloat Boulevard. For a rendering of proposed shoreline retreat and wastewater protection structures, see Figure 3.

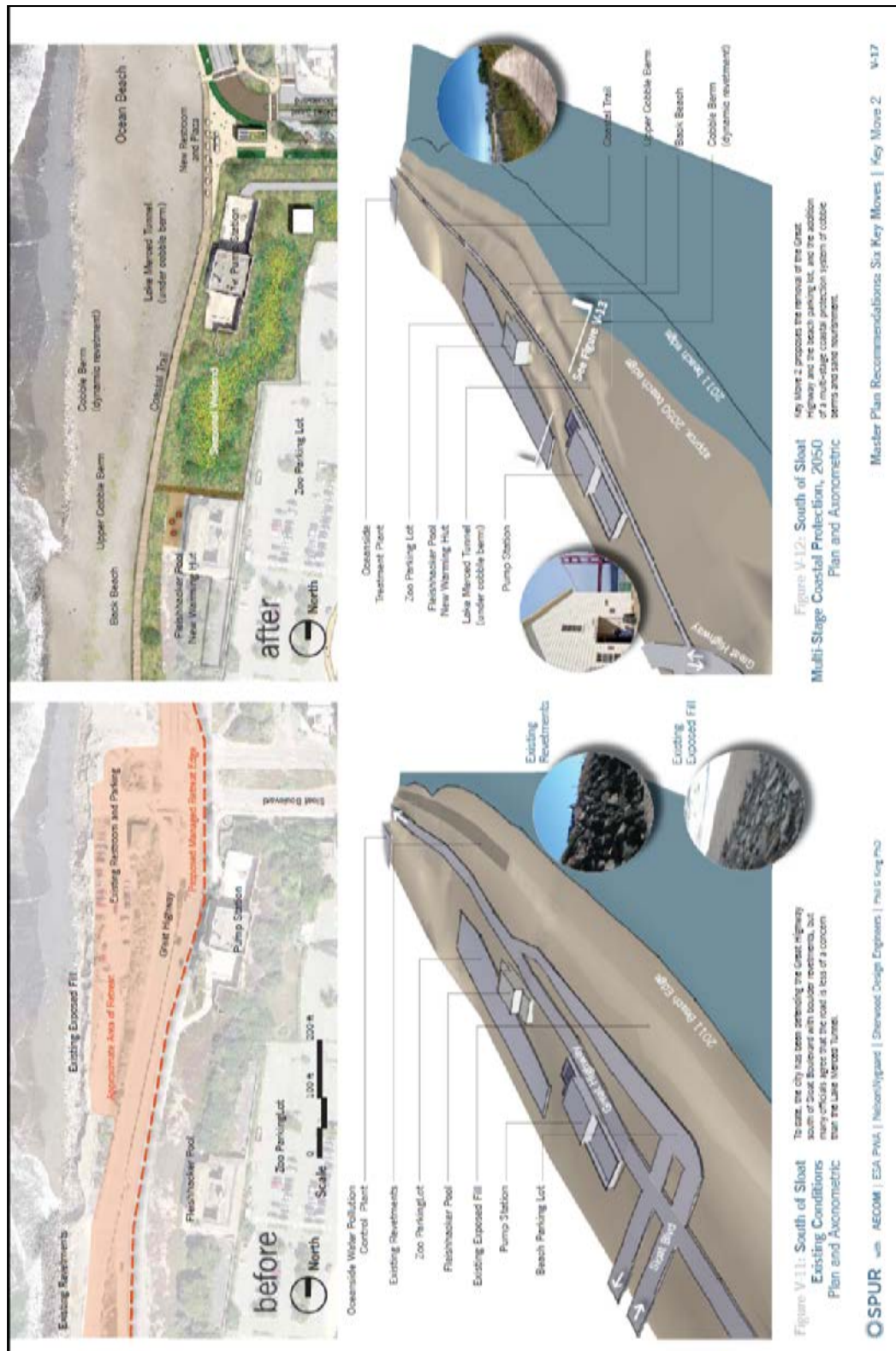


Figure 3. Ocean Beach Master Plan Key Move 2, proposed removal of the Great Highway and parking lots between Sloat Boulevard and Skyline Drive with low profile protection for the Lake Merced Tunnel and other wastewater infrastructure. Graphic Credit: SPUR, 2012.

COASTAL COMMISSION AND LOCAL COASTAL PROGRAM JURISDICTION

Pursuant to the California Coastal Act of 1976, all development within the state's Coastal Zone must conform to the public access and coastal resource protection policies of the Coastal Act. These requirements are implemented by the California Coastal Commission in partnership with the state's coastal cities and counties through local coastal programs.

San Francisco prepared its local coastal program (LCP), comprised of the Western Shoreline Area Plan and implementing policies of the Planning Code, in the early 1980s, and the City's LCP was certified by the California Coastal Commission as meeting the requirements of the Coastal Act on March 14, 1986. The City exercises coastal development permitting authority under the certified LCP, and the policies of the LCP form the legal standard of review for both public (state and local) and private projects under this authority.

The Coastal Commission retains coastal development permitting jurisdiction over projects located on tidelands, submerged lands, and public trust lands, and for any state, local, or private projects on federal lands. In addition, the federal Coastal Zone Management Act grants federal consistency review authority to the Coastal Commission for all projects affecting the Coastal Zone that are either undertaken by the federal government or that require a federal license, permit, or approval. The Chapter 3 policies of the Coastal Act – not the City's LCP – serve as the standard of review for the Coastal Commission's coastal development permitting and federal consistency review authorities.

All projects approved or undertaken by the City, regardless of location, are reviewed for consistency with the General Plan. Thus, the policies of the Western Shoreline Plan apply to both actions that are subject to the City's coastal permit authority and to the City's General Plan.

The San Francisco Coastal Zone extends approximately 6 miles along the western shoreline from the Fort Funston cliff area in the south to the Point Lobos recreational area in the north. The south end of the Coastal Zone includes the Lake Merced area, the Zoo, the Olympic Club, and the seashore and bluff area of Fort Funston. The Coastal Zone spans the Ocean Beach shoreline and includes Golden Gate Park west of Fortieth Avenue, the Great Highway corridor and the adjacent residential blocks in the Sunset and Richmond districts. The north end of the seashore includes the Cliff House and Sutro Baths area, Sutro Heights Park, and Point Lobos recreational area.

Most of the San Francisco western shoreline is publicly owned. Golden Gate Park, the Zoo, and Lake Merced contain 60 percent of the 1,771 acres which comprise the Coastal Zone area. Another 25 percent of the Coastal Zone is within the Golden Gate National Recreation Area. Only 14 percent of the land is privately owned, and 9 percent of this land is within the Olympic Club area. The remaining 5 percent is private residential and commercial property which fronts or lies in close proximity to the seashore. The Coastal Commission did not certify the portion of the LCP addressing the Olympic Club out of concern that this private open space area might be subject to future development pressure. Accordingly, the Coastal Commission retains coastal development permitting authority over the club, and San Francisco's LCP does not apply to this area.

Ocean Beach, the Cliff House, Sutro Baths, and Fort Funston are managed by the National Park Service as part of the Golden Gate National Recreation Area. The City's LCP does not govern federal activities or state, local or private projects on these federal lands. Therefore, policies included in the Western Shoreline Plan (under Objectives 6, 8, and 9) that address federal parklands apply only to actions that are subject to review under the City's General Plan.

COASTAL HAZARD POLICY DEVELOPMENT

In 2015, the Planning Department was awarded grants from the Coastal Commission and the State Ocean Protection Council to incorporate the Ocean Beach Master Plan recommendations for South Ocean Beach into the City's Local Coastal Program. Because of the urgent need to address shoreline erosion at south Ocean Beach, this amendment only addresses sea level rise, coastal erosion, and coastal flood hazards. The amendment will cover the entire Coastal Zone, but near term implementation will largely occur south of Sloat Boulevard, where coastal hazard vulnerabilities are most acute. This amendment has been developed in conjunction with an Interagency Committee made up of City, State, and Golden Gate National Recreation Area partners and a Community Advisory Group including neighborhood and non-profit organization representatives. The Planning Department has also hosted two public workshops on the amendment.

REQUIRED COMMISSION ACTION

The proposed Ordinance is before the Commission so that it may adopt, or reject the proposed initiation.

RECOMMENDATION

The Department recommends that the Commission recommend approval of the General Plan amendments.

BASIS FOR RECOMMENDATION

The Planning Department supports the proposed amendments because they will address current and future coastal hazards across San Francisco's LCP planning area and facilitate adaptive measures to protect coastal resources, public infrastructure, and coastal recreation. These amendments will also bring San Francisco's Local Coastal Program into consistency with the Coastal Commission's 2015 Sea Level Rise Policy Guidance. All private properties located within the City's LCP area are protected from coastal hazards by the Great Highway and the existing O'Shaughnessy, Taraval, and Noriega seawalls. As such, the proposed coastal hazard and sea level rise adaptation policies would have no practical effect on private development in the City's Coastal Zone unless and until these existing public infrastructure facilities are removed or abandoned. In the event that this were to occur, the proposed coastal hazards and sea level rise adaptation policies shall not be implemented in a manner that would take or damage private property without compensation because such action would be in conflict with Coastal Act section 30010 and the U.S. Constitution.

ENVIRONMENTAL REVIEW

Pursuant to CEQA section 21080.9, adoption of this LCP amendment is exempt from environmental review under CEQA.

PUBLIC COMMENT

This amendment has been developed in conjunction with an Interagency Committee made up of City, State, and Golden Gate National Recreation Area partners and a Community Advisory Group including neighborhood and non-profit organization representatives. The Planning Department has also hosted three public workshops on the amendment.

PROCESS FOR LOCAL COASTAL PROGRAM AMENDMENT AND CERTIFICATION

Pending Planning Commission and Board of Supervisors approval, the amendment will be submitted to the California Coastal Commission. If the Coastal Commission approves the language as submitted, the amended Local Coastal Program will be certified. If the Coastal Commission requests revisions, the amendment will return to the Planning Commission and Board of Supervisors for further review. Once approved, the amendment will become part of the City's Local Coastal Program and Western Shoreline Area Plan, as it is an area plan under the City's General Plan.

<p>RECOMMENDATION: Approve the General Plan Amendments for the Western Shoreline Area Plan.</p>
--

Attachments:

- A: Community Advisory Group and Interagency Committee member lists
- B: Public Outreach Timeline
- C: Interagency and Coastal Commission Coordination Timeline
- D; Public Comment and Response to Comments
- E: Memo on Coastal Commission Suggested Modifications
- F: Resolution of intent to initiate General Plan Amendments
- G: Draft Ordinance General Plan Amendments
- H: Coastal Development Permit #2-15-1357, San Francisco Public Utility Commission's South Ocean Beach Short Term Coastal Erosion Protection Measures
- I: Ocean Beach Master Plan, SPUR 2012

Interagency Committee Members

CA Coastal Commission: Jeannine Manna
CA Coastal Commission: Kelsey Ducklow
CA Coastal Commission: Nancy Cave
CA Ocean Protection Council: Abe Doherty
GGNRA: Brian Avilas
GGNRA: Steve Ortega
SF Planning Department: Chris Kern
SF Planning Department: Justin Horner
SF Planning Department: Maggie Wenger
SF Recreation and Parks : Stacy Radine Bradley
SF Recreation and Parks : Brian Stokle
SF Zoo: Joe Fitting
SFCTA: Anna Laforte
SFMTA: Tim Doherty
SFPUC: Anna Roche
SFPW: Boris Deunert
SFPW: Maureen Zogg
SPUR: Ben Grant

Community Advisory Group Members

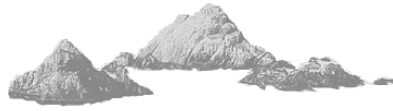
Amy Zock
Ben Brooks
Bill McLaughlin
Brian Veit
Buffy Maguire
Dan Murphy
Eddie Tavasieff
George Orbelian
Janice Li
Katherine Howard
Lara Truppelli
Marc Duffet
Mark Massara
Matt O'Grady
Paolo Cusulich-Schwartz
Rob Caughlan
Shannon Fiala
Stephanie Li
Steve Lawrence

Public Involvement Timeline

LCP Advisory Group Meeting	October 14, 2015
LCP Advisory Group Meeting	April 5, 2016
Community Meeting	April 19, 2016
LCP Advisory Group Meeting	July 27, 2016
LCP Advisory Group Meeting	October 24, 2016
Draft amendment released for public review	November 7, 2016
Community Meeting	November 17, 2016
Planning Commission Briefing	December 1, 2016
Planning Commission Initiation Hearing	March 2, 2017
Community Meeting	May 2, 2017
Sunset Parkside Education and Action Committee	May 15, 2017
Outer Sunset Parkside Residents Association	May 25, 2017
Planning Commission Adoption Hearing	June 8, 2017

Interagency and Coastal Commission Coordination Timeline

Coastal Commission Staff Meeting	March 5, 2014
Coastal Commission Staff Meeting	March 25, 2014
Coastal Commission Staff Meeting	May 21, 2014
Ocean Protection Council Meeting	December 2, 2014
Interagency Committee Meeting 1	July 1, 2015
Coastal Commission Staff Meeting	August 5, 2015
Interagency Committee Meeting 2	March 15, 2016
Community Meeting	April 19, 2016
Interagency Committee Meeting 3	June 28, 2016
Coastal Commission Staff Meeting	August 25, 2016
Interagency Committee Meeting 4	October 13, 2016
Interagency Committee Meeting 5	October 20, 2016
Community Meeting	November 17, 2016
Coastal Commission Staff Meeting	December 14, 2016
Coastal Commission Staff Meeting	April 20, 2016
Community Meeting	May 2, 2017



March 28th, 2017

To: SF Supervisors and Planning Department

RE: Ocean Beach Master Plan Transportation element – letter of support

Dear Supervisors and Planning Commissioners,

1. One Lane each way, with multi-use trail on Outer Great Hwy is preferred:

a. As someone who lives on the great highway, I just wanted to say that many of us *support* taking the outer Great Highway down to one lane in each direction. Providing a multi-use trail will be a huge benefit.

b. As a civil engineer, I would like to point out that throughput need not suffer greatly. As it stands now, it's often closed *entirely* and the impact to lower great highway is not that bad.

c. As a neighborhood watch captain, I can represent that many of the folks who live here concur. The current situation lends itself to racing, running red lights, and is probably less safe than a “one lane in each direction” alternative.

2. Lower Great Hwy Eventual Closure due to sea level encroachment is ok:



a. Lower great highway is already one lane southbound and will soon be one lane in each direction and soon after that closed entirely. So be it.

b. The possibility of a dedicated trail from funston along the great highway all the way to the cliff house / batteries to bluffs connection and beyond is **awesome**.

3. Lower Great Hwy where it meets skyline needs control:

The intersection of Skyline and lower great highway is treacherous. I took some kids on a field trip to the Sewage Treatment plant and it was really hectic, just extremely dangerous. Northbound traffic on skyline doesn't stop at all, ever... For many miles. We don't need lights that operate all the time, but a traffic circle there with **actuated on-demand pedestrian crossing** is a necessity.

So as a resident and an engineer, I support taking the outer great highway to one lane in each direction, eventually closing the southern section of the Great Hwy, and adding traffic control at Skyline / Lake Merced.

Thank you,

Brian Veit

From: [DENNIS J HOLL](#)
To: [Wenger, Maggie \(CPC\)](#)
Cc: [Kern, Chris \(CPC\)](#); [Peskin, Aaron \(BOS\)](#); [Yee, Norman \(BOS\)](#)
Subject: Erosion at Ocean Beach
Date: Tuesday, March 21, 2017 2:24:44 PM

A recent article in the Westside Observer about the erosion at Ocean Beach does a disservice to the people of San Francisco because it parrots the falsehoods contained in the Ocean Beach Master Plan. The Planning Department is in the process of adopting recommendations in the plan that will accelerate erosion of the natural shoreline at Ocean Beach at a cost of hundreds of millions of dollars. Let's examine some of the flaws in the plan.

The Plan's authors are enamored of a strategy for dealing with coastal erosion known as "managed retreat" whereby dry land is allowed to be flooded by the sea. The justification for this strategy, which is identified as a benefit in the Plan, is the Olmstead study. This was a hastily done 1979 examination of maps and old pictures which incorrectly concluded that the western shoreline was pushed 200 feet seaward of its natural equilibrium. The Plan's authors ignored an 1893 USGS report by one Andrew Lawson which stated that there was a "true sea cliff of the Terrace formations", later called Colma Formations, beneath the sand dunes. In fact, anyone who goes to the beach can see the Colma formation today exposed at Noriega Street. I sent a picture of this to Senior Planner Chris Kern but he did not respond. I would think that physical evidence would be more persuasive than a dubious examination of old maps and pictures. From my examination of old maps and pictures, it seems obvious that Olmstead more than once confused the shoreline with the line of bluffs which was set well back from the shoreline in those days.

The article has a picture of erosion at Ocean Beach that they say will endanger the Lake Merced tunnel and that the proposed amendments to the Local Coastal Plan will address erosion, coastal protection and sea level rise. Their solution calls for removal of all armoring at south Ocean Beach, allowing the ocean to erode the natural land there. The fact is that there has been no erosion at the two rock revetments in the area. The only erosion has been to the bluffs that are protected only by the artificial cobblestone berm formed from the concrete rubble that has fallen from the old roadway lying between the revetments. That same bluff suffered additional erosion from the top down after the asphalt was removed prior to this winter. The Plan calls for a cobblestone berm to be placed adjacent to the Wastewater Treatment Plant for protection after the rock revetments have been removed. Interestingly, the Plan itself contains the information that cobblestone berms do not provide complete protection from erosion by wave action and the evidence is at the beach today. In effect, implementation of the Plan will mean that the Wastewater Treatment Plant will be flooded by the sea decades sooner than if the rock revetments were to remain in place.

Mr. Kern has been quoted saying that managed retreat will provide a wider beach for a longer time than if there is no retreat. That is simply wishful thinking with no basis in science or in the Plan. Even after the armoring is removed and then reinstalled thirty yards to the east, that part of the shore will still stick out from the shorelines on either side and the winter waves will scour all the sand away right up to whatever barrier is there. In fact, south of the rock revetment, the winter waves are eroding the sand bluffs. The good news is that in the spring and summer most of the lost sand will be deposited back on the beach just as it is happening right now. The Plan calls for providing a beach by covering the cobblestone berm with sand nourishment.

So, doing managed retreat will not provide a beach, it will not improve the waves, and it will increase the risk of erosion at the Wastewater Treatment Plant. It is not a benefit in and of itself, it is a strategy and it is the wrong strategy for San Francisco.

These amendments are a radical change from the existing LCP which calls for armoring the whole shoreline. It is odd that SPUR has proposed huge levees to protect the filled land at Mission Bay, that the new community at Treasure Island will require huge levees, as will Hunter's Point and the International Airport, yet the natural land at Ocean Beach should be abandoned to the sea.

In the future, when the rising sea level reaches 46th Avenue, will the Coastal Commission require that all the homes on 45th Avenue must be demolished to maintain the beach?

Please consider these statements before adopting then proposed amendments.

Dennis Holl
2951 24th Avenue
San Francisco



SIERRA CLUB

SAN FRANCISCO BAY

Serving Alameda, Contra Costa, Marin and San Francisco counties

February 17, 2017

Ms. Maggie Wenger
Project Manager
San Francisco Local Coastal Program Amendment
San Francisco Planning Department
1650 Mission Street, Suite 400
San Francisco, CA 94103

Ms. Wenger:

The Sierra Club appreciates the study and careful work that has gone into the first revisions in many years to San Francisco's Local Coastal Program.

We have reviewed these revisions and have some recommendations. Please see the attached document, which shows the proposed changes in marked format to Policies 12.5, 12.8, and 12.9.

Please let us know if you have any questions or if we can be of further assistance.

Sincerely,

Arthur Feinstein
California Executive Committee

Katherine Howard
San Francisco Group Executive Committee

cc: San Francisco Planning Commission
San Francisco Board of Supervisors

COASTAL HAZARDS**OBJECTIVE 12**

PRESERVE, ENHANCE, AND RESTORE THE OCEAN BEACH SHORELINE WHILE PROTECTING PUBLIC ACCESS, SCENIC QUALITY, NATURAL RESOURCES, CRITICAL PUBLIC INFRASTRUCTURE, AND EXISTING DEVELOPMENT FROM COASTAL HAZARDS

POLICY 12.1

The City shall implement the following adaptation measures to preserve, enhance, and restore public access, scenic quality, and natural resources along South Ocean Beach and to protect wastewater and stormwater infrastructure from impacts due to shoreline erosion, coastal flooding, and sea level rise.

- (a) As the shoreline retreats due to erosion and sea level rise, incrementally remove shoreline armoring, rubble that has fallen onto the beach, roadway surfaces, and concrete barriers south of Sloat Boulevard.
- (b) Relocate public beach parking and public restrooms to areas that will not be affected by shoreline erosion or sea level rise in the foreseeable future and that will not require the construction of shoreline armoring.
- (c) Close the Great Highway between Sloat and Skyline boulevards, and reroute traffic to Skyline Boulevard.
- (d) Import sand to restore the beach and construct dunes, and stabilize dunes with vegetation, beach grass straw punch, brushwood fencing, or other non-structural methods.
- (e) Extend the coastal trail to Fort Funston and Lake Merced by constructing a multi-use public access pathway along the shoreline from Sloat Boulevard to Skyline Boulevard.
- (f) Protect coastal water quality and public health by preventing damage to wastewater and stormwater infrastructure due to shoreline erosion, and maintaining service vehicle access necessary for the continued operation and maintenance of wastewater and stormwater infrastructure systems.

POLICY 12.2

The City shall conduct detailed sea level rise vulnerability assessments and develop adaptation plans to minimize risks to life, property, essential public services, public access and recreation, and scenic and natural resources from shoreline erosion, coastal flooding and sea level rise for the remaining areas of the Western Shoreline that are not addressed under Policy 12.1. The vulnerability assessments shall include a scenario that does not rely on existing shoreline armoring. Adaptation measures shall be designed to minimize impacts on shoreline sand supply, scenic and natural resources, public recreation, and coastal access. The adaptation plans shall consider a range of alternatives, including protection, elevation, flood proofing, relocation or partial relocation, and reconfiguration. Adaptation measures that preserve, enhance, or restore the sandy beach, dunes, and natural and scenic resources such as beach nourishment, dune restoration, and managed retreat shall be preferred over new or expanded shoreline armoring .

,

Sierra Club Comments on November 7, 2016 Draft

San Francisco Local Coastal Program Amendment
Coastal Hazards Policies

November 7, 2016
Preliminary Draft

POLICY 12.3

The City shall work with the U.S. Army Corps of Engineers to develop and implement a beach nourishment program involving the placement of sand dredged from the San Francisco bar navigation channel offshore of the Golden Gate onto Ocean Beach. Other sources of suitable sand may also be permitted. Sand shall not be removed from stable dunes.

POLICY 12.4

The City shall maintain sea level rise hazard maps designating areas within the coastal zone that would be exposed to an increased risk of flooding due to sea level rise. The maps shall be based on the best available science and updated when new information warranting significant adjustments to sea level rise projections becomes available.

POLICY 12.5

New development ~~and substantial improvements to existing development located~~ shall be discouraged in areas that would be exposed to an increased risk of flooding due to sea level rise. unless they can demonstrate that they will not require further shoreline armoring in the future and provide assurances that they will be responsible for the costs if such armoring proves necessary. All substantial improvements to existing development shall be designed and constructed to ~~minimize~~ assure no added risks to life and property due to flooding and shall provide assurances that they will be responsible for any shoreline armoring costs the improvements may require in the future.

POLICY 12.6

New development shall assure stability and structural integrity, and neither create nor contribute significantly to erosion, geologic instability, or destruction of the site or surrounding area or in any way require the construction of protective devices that would substantially alter natural landforms along bluffs and cliffs.

POLICY 12.7

Shoreline armoring structures such as rock revetments and seawalls may only be permitted when necessary to protect critical public infrastructure and existing development from a substantial risk of loss or damage due to erosion and only when less environmentally damaging alternatives such as beach nourishment, dune restoration, and managed retreat are determined to be infeasible. New or expanded shoreline armoring structures shall not be permitted solely to protect parking, restrooms, or pedestrian or bicycle facilities.

POLICY 12.8

All shoreline erosion control and flood protection structures shall be designed and constructed to avoid, minimize, and mitigate impacts on shoreline sand supply, ~~environmentally sensitive~~ habitat areas, public recreation, and coastal access.

POLICY 12.9

All new projects, maintenance or improvements to existing structures or infrastructure shall use only the minimum lighting needed for personal safety. This lighting shall employ the most current Dark Sky lighting principles and up-to-date lighting systems, in order to minimize the negative impacts of artificial light on people and wildlife, and to preserve the natural beauty and habitat of the area.



San Francisco Bicycle Coalition
833 Market Street, 10th Floor
San Francisco, CA 94103

T 415.431.BIKE
F 415.431.2468

sfbike.org

May 24, 2017

San Francisco Planning Commission
1650 Mission Street, Suite 400
San Francisco, CA 94103

RE: Letter of Support – Western Shoreline Area Plan Amendment

To the San Francisco Planning Commission:

On behalf of the San Francisco Bicycle Coalition I am writing to convey our support for the proposed amendment to the Western Shoreline Area Plan, which would expand the reach of the Local Coastal Program to address critical issues facing San Francisco due to climate change. Sea level rise, erosion, flooding and other coastal hazards are happening now, and these proactive steps will help the city to adapt to future climate scenarios.

These near-term adaptation measures are an important step towards the long term goal to allow for greater coastal access, public recreation and habitat protection along Ocean Beach. The amendment implements key portions of the Ocean Beach Master Plan, a comprehensive plan completed in 2012 for the management and protection of San Francisco's Ocean Beach. In particular the amendment includes the managed retreat south of Sloat Boulevard, which would allow space for a multi-use path along the water to create a safe connection for people walking and biking to the Lake Merced area.

Expanding the Local Coastal Program not only responds to the threats of climate change, but also open up opportunities to improve connections for people walking and biking. The annual bike counts from the SF Municipal Transportation Agency reported a 25% increase since 2014, and we want to see that number continue to increase. A world-class bicycle facility along Ocean Beach would promote sustainable, active transportation and would encourage more people to bike. Better bike infrastructure would further improve access to the new recreation opportunities opening at Lake Merced West as well.

Please approve this amendment to take the necessary steps to protect and preserve our coast for future generations to enjoy.

Sincerely,

A handwritten signature in black ink, appearing to be "Julia Raskin".

Julia Raskin
Community Organizer
San Francisco Bicycle Coalition



SFMTA
Municipal
Transportation
Agency

Edwin M. Lee, *Mayor*

Cheryl Brinkman, *Chairman*

Malcolm Heinicke, *Vice-Chairman*

Gwyneth Borden, *Director*

Lee Hsu, *Director*

Joél Ramos, *Director*

Cristina Rubke, *Director*

Art Torres, *Director*

Edward D. Reiskin, *Director of Transportation*

May 24, 2017

San Francisco Planning Commission
1650 Mission Street, Suite 400
San Francisco, CA 94103

RE: Local Coastal Program Amendment -- SUPPORT

Dear San Francisco Planning Commissioners:

The San Francisco Municipal Transportation Agency (SFMTA) supports the Local Coastal Program (LCP) Amendment which provides a policy framework for building a more resilient shoreline and multimodal transportation system. The Local Coastal Program amendment specifically addresses climate change, sea level rise, and coastal erosion which are powerful processes that shape the San Francisco shoreline. For example, coastal erosion events have significantly impacted critical elements of San Francisco's multimodal transportation system along Ocean Beach including portions of the southern extent of Great Highway and public parking in the vicinity of Sloat Boulevard. Looking ahead, sea level rise will likely exacerbate these coastal hazards in the future.

In an effort to address coastal hazards along Ocean Beach, the SFMTA participated in the development of the 2012 Ocean Beach Master Plan (OBMP). The development of the OBMP was a public process and resulted in a long-term vision for Ocean Beach which addresses infrastructure, public access and connectivity, coastal habitat, environmental stewardship in the context of dynamic coastal processes such as erosion and sea level rise.

The SFMTA supports the adoption of the LCP Amendment as it provides the policy framework for the implementation of a number of important OBMP recommendations. The policies within the LCP will improve safety, build a more resilient multi-modal transportation system and provide safe public access to the San Francisco shoreline.

If we can provide you with additional information regarding our support, please do not hesitate to contact Tim Doherty, Planner, at 415-641-2186 or timothy.doherty@sfmta.com. Thank you for your consideration.

Sincerely,

Edward D. Reiskin,
Director of Transportation

311 Free language assistance / 免費語言協助 / Ayuda gratis con el idioma / Бесплатная помощь переводчиков / Trợ giúp Thông dịch Miễn phí / Assistance linguistique gratuite / 無料の言語支援 / 무료 언어 지원 / Libreng tulong para sa wikang Filipino / การช่วยเหลือทางภาษาโดยไม่เสียค่าใช้จ่าย / خط المساعدة المجاني على الرقم



**San Francisco
Chapter**

PO Box 193652 San Francisco, CA 94119

May 19, 2017

City of San Francisco Planning Department
1650 Mission Street
San Francisco, CA

Re: Public Comment on the current Local Coastal Plan (LCP)
Amendment

Dear City of San Francisco Planning Department:

For more than twenty years, the Surfrider Foundation San Francisco Chapter has reviewed and commented on shoreline management projects in the City of San Francisco. In regards to the draft LCP amendment, previous letters were submitted on February 22, 2017, and June 14, 2016 that reflect our priorities and concerns.

The Surfrider Foundation is an organization representing 250,000 surfers and beach-goers worldwide that value the protection and enjoyment of oceans, waves and beaches. As human activities and development in coastal areas increase, preservation and careful planning of these areas becomes more important.

We appreciate the City's proactive commitment to update its Western Shoreline Area Plan or LCP, especially the dedication to integrating climate change impacts into future planning.

We have several remaining concerns regarding language and policies in the current LCP amendment that is to be voted upon by the Planning Commission on June 8, 2017.

Critical Historical Omissions

To begin, we would like to point out that the Western Shoreline Area Plan amendment staff report included several critical omissions regarding the background of erosion management at Ocean Beach.

In 1986, the Coastal Commission certified the first LCP, which was then called the Western Shoreline Plan. That same year, the Coastal Commission also ratified a document called the City and County of San Francisco's Ocean Beach Beach Nourishment Plan (see attached). The Beach Nourishment document is essentially the



current erosion control policy for Ocean Beach. It came into being under a mandate by the California Coastal Commission as a condition for approving the wastewater infrastructure at Ocean Beach. Among other issues, the 1986 approved Beach Nourishment Plan spells out exactly how the City would respond to beach erosion as it threatens that infrastructure. According to Coastal Commission staff, the Beach Nourishment document is still in force.¹ However, there is neither mention of it nor clear evidence of its role in the current LCP amendment draft or supplementary materials.

This is important as the LCP amendment under consideration changes the original erosion control policy set up in 1986 (the Beach Nourishment Plan agreement). For example, the LCP amendment seeks to permit the option of building a shoreline protective device south of Sloat, the relocation of the road and the parking lots, and the de facto transfer of that land to the GGNRA after it is restored to sand dunes and beach. The option of building a shoreline protective device is perhaps the most significant part of the amendment. In the originally approved Coastal Commission permit for the wastewater plant and storage system, the agency went to extraordinary lengths to ensure that the City would avoid building new seawalls to protect the structures and instead use sand nourishment. Beach replenishment was supposed to be the primary means to both protect infrastructure and preserve the public beach.

The omission of the role of the Beach Nourishment Plan in the background history of this LCP has major ramifications in the case of Sloat. The 1986 document identified any emergency quarry stone protection for the infrastructure to be "temporary or short-term"². In other words, the City was supposed to remove this rock and instead build sand dunes for erosion control. This did not happen. Additionally, the Beach Nourishment Plan promised: "The previous use of rubble for protection will be discontinued, and exposed rubble will be removed." Obviously, this part of the agreement was also not adhered to.

The same year the Ocean Beach Beach Nourishment Plan was certified also was the year that the original Western Shoreline

¹ This is not to be confused with the 2015 Coastal Commission permit (CDP #2-15-1357) which allows for short term measures such as sand bags at Sloat to protect infrastructure while a long term plan is implemented.

² City and County of San Francisco Ocean Beach Beach Nourishment Plan November 1986 Page 26



Area Plan was approved. The original LCP document was consistent with the Beach Nourishment Plan in its language on these issues. For example, inside the Western Shoreline Area Plan, under Ocean Beach: Objective 6, Policy 2 we have a clear reference to the management of beach erosion: "Improve and stabilize the sand dunes where necessary with natural materials in order to control erosion." The 1986 LCP also instructs the city to maintain the beach "[...]in a state free of litter and debris." (Objective 6 Policy 3).

Another noteworthy historical omission is that there is no recognition of the work of the Ocean Beach Task Force (OBTf), a government/community stakeholder group created under former Mayor Willie Brown. Like the SPUR-led Ocean Beach Master Plan, the OBTf was charged with coming up with a long-term fix for Sloat erosion. In the late 1990's thru early 2000s, the OBTf met numerous times, and logged many hours of work toward this goal. By 2005, the group issued a report recommending a managed retreat plan for the road and parking lots. That plan was rejected by the San Francisco Department of Public Works due to cost concerns. We feel it is important to note this in the record.

Policies Supported in the Current LCP:

Surfrider supports the change in policy that calls managed retreat of the road and parking lots. We believe it important that we do this in two phases due to the time needed to fund, permit and build the long-term plan. We support the need for managed retreat of infrastructure because engineers that have studied the erosion site believe sand dunes can no longer serve as effective protection.³ Additional beach area is also needed so that sand dunes can be more effective as protection for a longer period of time while preserving the beach.

In the current LCP, we naturally support the preferred use of soft measures for erosion emergencies over armoring. We also applaud the language that identifies the use of managed retreat-based solutions to address future erosion. It is clarification on these items that we are asking for.

³Both USGS and City engineers have found that any sand dunes south of Sloat are projected to last 3-5 years before entirely washing away.



RE: Clarifying language in this LCP Amendment: The following points reiterate issues raised from our previous comment letters to SF Planning.

The LCP must clarify hard armoring as a tool of last resort, to be employed only in the case of emergencies (clearly defined), and must have a **deadline** for removal and replacement by softer solutions such as new sand dunes when the emergency permit expires.

The LCP must also clearly identify managed retreat as **the preferred**, long-term strategy to address erosion of Ocean Beach.

The Coastal Commission's Sea Level Rise Policy Guidance document summarizes in Chapter 3 a mandate to "maximize natural shoreline values and processes; avoid expansion and minimize the perpetuation of shoreline armoring." In order to comply in earnest with the Coastal Act, long-term, proactive planning based upon managed retreat policies must be integrally incorporated into the LCP update. Sand dune maintenance and replenishment should be allowed as part of a strategy to prepare for the implementation of managed retreat.

Furthermore the LCP should clearly state that managed retreat cannot be ruled out on cost alone.

The amendment must also clearly prohibit unnecessary new development in the erosion hazard area. The Coastal Act's chapter 3 section 30253 clearly prohibits coastal armoring for new development and redevelopment.

Suggested modifications

In order to reflect concerns put forth in this letter, we offer the following suggested modifications to current LCP amendment:

- Policy 12.1
 - (c) Relocate the Great Highway south of Sloat in 2 Phases:

Phase 1. Consolidate the Great Highway south of Sloat to one northbound and one southbound lane. Realign the new lanes away from the erosion hazard, in a straight north/south configuration that is situated onto the landward side of the bluff.



Phase 2: When a long term protection plan for the wastewater infrastructure is approved for construction, allow for the closure of the Great Highway between Sloat and Skyline boulevards with traffic re-routed to Skyline Boulevard.

(f) Build a comprehensive long-term protection plan for the wastewater infrastructure that minimizes adverse impacts to beach access, natural shoreline ecology, natural processes and aesthetics.

- Policy 12.3: This section is not needed. The city already has a beach nourishment plan on file with the Coastal Commission. (San Francisco Ocean Beach Beach Nourishment Plan November 1986 prepared by the SF Clean Water Program). This is on file with the California Coastal Commission.
- Policy 12.4 - At the end of line 19: "Less environmentally damaging alternatives cannot be rejected as infeasible on cost alone."
- Policy 12.5: Add to the end of the first paragraph Line 11: "Less environmentally damaging alternatives such as beach nourishment, dune restoration, and managed retreat cannot be considered to be infeasible due to cost alone."
- Policy 12.7 Include language that reflects the Coastal Commission's Sea Level Rise Policy Guidance document recommendations. Please add the following: "Soft solutions, such as sand dune replenishment are preferred over armoring in emergencies. Any emergency armoring must have a deadline for removal and replacement by softer solutions such as sand dunes once the emergency permit expires and is limited to existing development."

We appreciate the opportunity to provide comments to the City of San Francisco about this important LCP update.

A handwritten signature in blue ink, appearing to read "Bill McLaughlin", on a light green rectangular background.

Bill McLaughlin
Surfrider Foundation, San Francisco Chapter
Restore Sloat Campaign Manager

From: [Secretary, Commissions \(CPC\)](#)
To: [Johnson, Christine \(CPC\)](#); [Richards, Dennis \(CPC\)](#); [Koppel, Joel \(CPC\)](#); [Moore, Kathrin \(CPC\)](#); [Melgar, Myrna \(CPC\)](#); [Rich Hillis](#); [Rodney Fong](#)
Cc: [Wenger, Maggie \(CPC\)](#); [Gerber, Patricia \(CPC\)](#)
Subject: FW: re March 12 Planning Commission meeting, Agenda Item 12
Date: Wednesday, March 01, 2017 8:51:33 AM

Office of Commission Affairs

Planning Department | City & County of San Francisco
1650 Mission Street, Suite 400, San Francisco, CA 94103
Direct: 415-558-6309 | Fax: 415-558-6409

commissions.secretary@sfgov.org
www.sfplanning.org

From: Jason Jungreis [mailto:jasonjungreis@gmail.com]
Sent: Tuesday, February 28, 2017 7:01 PM
To: Secretary, Commissions (CPC)
Subject: re March 12 Planning Commission meeting, Agenda Item 12

Dear Commissioner,

It is time that we update our environmental planning to include Dark Sky principles for the health of both people and wildlife. For the current proposed Local Coastal Program Amendment, please specify that the lighting shall employ the most current Dark Sky lighting principles and up-to-date lighting systems, in order to minimize the negative impacts of artificial light on people and wildlife, and to preserve the natural beauty and habitat of the area.

Thank you.

Jason Jungreis
527 47th Avenue
San Francisco CA 94121

From: [Kern, Chris \(CPC\)](#)
To: [Wenger, Maggie \(CPC\)](#)
Subject: FW: Ocean Beach Plan - Issues on Traffic and Transit, opportunities to connect and link up....
Date: Monday, April 17, 2017 1:31:58 PM

FYI

Chris Kern
Senior Environmental Planner

Planning Department, City and County of San Francisco
1650 Mission Street, Suite 400, San Francisco, CA 94103
Direct: 415-575-9037 **Fax:** 415-558-6409
Email: chris.kern@sfgov.org
Web: www.sfplanning.org

From: Aaron Goodman [mailto:amgodman@yahoo.com]
Sent: Wednesday, April 05, 2017 10:33 PM
To: bgrant@spur.org; Kern, Chris (CPC)
Subject: Ocean Beach Plan - Issues on Traffic and Transit, opportunities to connect and link up....

Benjamin Grant (SPUR) and Chris Kern @ SF Planning Dept.

I was not able to make the meeting recently on the Ocean Beach Great Highway proposal for changing the roadway south of Sloat Blvd. to a walking pedestrian zone.

As a person involved in transit and development issues in D7/D10/D11 and directly interested in the L-Taraval options related to the 19th Ave Transit planning efforts I wanted to submit comments on the proposal.

a) The proposed changes directly add to congestion on Sloat, and will relay traffic that prior went directly to the highway route south on the Pacifica and Daly City ridge line around to Sunset Blvd. What other considerations have been made to alleviate the transit impacts by re-linking the older L-Taraval line along Sloat back to St. Francis Circle, or directly to sunset blvd. and southbound to the west side of Stonestown, SFSU-CSU and Parkmerced's developments either routing up Holloway, or out to John Daly Blvd. to provide direct new transit services to these developments and the apartment and condo developments around Lake Merced?

b) The Link from the L-Taraval line could be done in coordination with the sale and redevelopment of Sloat Garden Center, which may be primed to sell due to the new development at 2800 Sloat.

c) What discussion has occurred with the SF Zoo that utilizes this entry area currently, will the Zoo change back to the prior entry and if so what occurs to their parking and entry system?

d) The Pacifica and Daly City Residents who utilize the area as do many commuters, how will this change be impacting neighborhoods and family housing zones to the east, when implemented, and what methods will be used to improve pedestrian crossing safety at a number of pedestrian crosswalks on Sloat directly eastbound, so that access is improved and safety acknowledged along the Caltrans route.

e) Many of the naturalist areas, for snowy plover and other migratory birds were directly impacted by the beach chalet soccer fields, what ways will plant and animal concerns be addressed in the area due to the prior impacts.

We have sketched and submitted the ideas and options for a tunnel below grade station at 20th and Sloat as a "T" intersection with the 19th Ave transit turning southbound construction wise at 20th which would alleviate some of the 19th ave impacts on underground construction and which could help provide a Stern Grove and mixed-use entry site at the pumpkin patch. This along with linking the L Taraval back up north to the N-Judah and L-Taraval could bring better north to south connectivity to other lines and loops/links in the system. I had conversed prior with Liz Brisson and Peter Albert on the concept, and how a secondary system with options on elevating it as required by topography could bring a quicker constructed link towards the Daly City BART station and regional transit linkages.

With increased developments at GGP Stonestown, SFSU-CSU, and Parkmerced it behooves us all to think more long-range on planning the adequate transit connectivity improvements especially when a roadway is removed or discontinued.

We often go to the beach from the excelsior, and as the muni and bus services do not provide adequate direct connectivity and frequent service we drive to the side street east of the great highway and park to walk across to the promenade. The increased traffic that will occur and development pressures on the west-side require out of the box thinking on how people use and access the water-front area..

Please do include these comments in the proposed efforts (EIR) or otherwise to ensure that the concern on public transit linkage is improved inclusive of pedestrian and bike routes along Sloat.

Sincerely

Aaron Goodman D11

From: [Doherty, Timothy](#)
To: [Wenger, Maggie \(CPC\)](#); [DeGuzman, Brian \(DPW\)](#); [Gee, Oscar \(DPW\)](#); [Olea, Ricardo \(MTA\)](#); [DeGuzman, Brian \(DPW\)](#); [Stokle, Brian \(REC\)](#); [Bradley, Stacy \(REC\)](#); [Harkman, Anna](#); [Munowitch, Monica](#); [Jose, Ben](#); [Valle-Schwenk, David \(MTA\)](#)
Subject: FW: Ocean Beach Master Plan/WesternShoreline Area Plan Amendment
Date: Thursday, April 27, 2017 11:04:13 AM

Hi,

I am passing along public comment re pedestrian safety issues along Skyline Blvd.

I will reach out to Ms Chan to provide her an update on the ongoing planning work and will follow up if there are any action items/issues.

Thanks, Tim

From: florence f chan [mailto:filolifloz@gmail.com]
Sent: Wednesday, April 26, 2017 7:51 PM
To: Doherty, Timothy <Timothy.Doherty@sfmta.com>
Subject: Ocean Beach Master Plan/WesternShoreline Area Plan Amendment

Hello Timothy:

I found your name listed on the Interagency Committee Members for the OBMP/LCPAmendment/WSAP Amendment.

I had contacted Ben Grant (SPUR) about my concern for pedestrian safety on Skyline Blvd with the implementation of the OBMP's diversion of southbound Great Hwy traffic onto Sloat (east) then Skyline (south). He advised that I contact DPW. I found your name on the Interagency Committee Members for SMTA.

Already unsafe elements exist the stretch of Skyline Blvd between Sloat Blvd to Great Hwy.



It's CalTrans Hwy 35 and the speed limit is 45 mph — which is totally unsafe for pedestrians crossing. So ironic, the 45mph signage is on the side of the road and “SLOW” is painted on the road. (photo)

The OBMP Transportation Document shows that evaluation of intersection Level of Service at along Skyline Blvd does not include the T-intersection at Harding Road (which lead into Harding Park/Lake Merced).

Harding Park (Park & Rec) includes many users & activities: golf, rowers, kayakers, canoers, zumba, birthday parties, fishing, picnickers, dragon boaters. There are many events through out the year. There are many of pedestrians crossing Skyline Blvd at the the north and south ends of Herbst Rd.

I would like to get together and do a walk through from the perspective of someone who goes to Lake Merced 3 times a week. I actually belong to a dragon boat team at Lake Merced and do use public transportation— often I find cars are very unyielding with only pedestrian scrambles in place. I am currently working with a board member of the California Dragon Boat Association to advocate for our member's safety.

In March 27, 2017 — I put in a Request for for City Services #6979919 and response was to forward the request to CalTrans. I have contacted the area supervisor (Norman Yee) already. His legislative aide contacted CalTrans and said that there was no plans for any traffic improvements for Skyline Blvd.

I will try to attend the May 2, 2017 Local Coastal Program Amendment meeting next week on May 2, 2017 6-8pm at the Ortega Branch Library.

Would you be able to give me advise how to bring attention to this concern? I know that there are the City agencies involved and CalTrans is responsible for Skyline.

Thank you,

Flo Chan





Serving Alameda, Contra Costa, Marin and San Francisco counties

Received at CPC Hearing 3/2/17

M. Wenger

February 28, 2017

Ms. Maggie Wenger
Project Manager
San Francisco Local Coastal Program Amendment
San Francisco Planning Department
1650 Mission Street, Suite 400
San Francisco, CA 94103

Ms. Wenger:

We have reviewed the updated March 2, 2017 documents and propose the following revisions:

Delete lines 20- 25, Page 6, and replace with:

New development shall be discouraged in areas that would be exposed to an increased risk of flooding due to sea level rise, unless it can be demonstrated that the new development will not require further shoreline armoring in the future and unless the developer can provide assurances that they will be responsible for the costs if such armoring proves necessary. All substantial improvements to existing development shall be designed and constructed to assure no added risks to life and property due to flooding, and the developer shall provide assurances that they will be responsible for any shoreline armoring costs the improvements may require in the future.

Add new:

Policy 12.7

All new projects, maintenance or improvements to existing structures or infrastructure shall use only the minimum lighting needed for personal safety. This lighting shall employ the most current Dark Sky lighting principles and up-to-date lighting systems, in order to minimize the negative impacts of artificial light on people and wildlife, and to preserve the natural beauty and habitat of the area.

Please let us know if you have any questions or if we can be of further assistance.

Sincerely,

Arthur Feinstein
California Executive Committee

Katherine Howard
San Francisco Group Executive Committee

cc: San Francisco Planning Commission
San Francisco Board of Supervisors



*inspiring people to protect
Bay Area birds since 1917*

Received at CPC Hearing 3/2/17
M. Wenger

Via U.S. Mail and email

March 1, 2017

Ms. Maggie Wenger
San Francisco Planning Department
1650 Mission Street, Suite 400
San Francisco, CA 94103-2479
maggie.wenger@sfgov.org

RE: Western Shoreline Area Plan Amendment
Case 20142110CWP

Dear Ms. Maggie Wenger:

I am writing on behalf of the Golden Gate Audubon Society concerning the General Plan Amendments to the Western Shoreline Area Plan. Golden Gate Audubon has over 10,000 members and supporters and is an independent chapter of the National Audubon Society. Since 1917 Golden Gate Audubon has worked for the conservation of birds and habitats in the San Francisco Bay Area and to connect Bay Area residents with nature.

Our members use and enjoy the Western Shoreline of San Francisco. Our members often visit this shoreline area to engage in bird watching, scientific research, and recreation activities. Golden Gate Audubon holds popular field trips to Ocean Beach. This may be the first time that many people get to see, hear and learn about the birds and other wildlife that depend on this shoreline habitat which makes California remarkable.

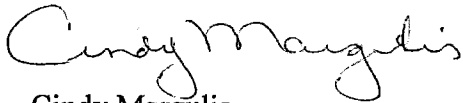
The wildlife we are concerned with are the wintering shorebirds that inhabit the beach from October through March; spring migrants that occur, sometimes in huge numbers, from March through April; fall migrants that stop along the beach between July and October; and birds that utilize the beach during the nesting season of April through August. We are particularly concerned about the welfare of the Bank Swallows at the north end of Fort Funston (April through July), the Burrowing Owl that winters in the same area, the Snowy Plovers that use the beach along its entire length, and the numerous birds that feed and roost on the beach during migration. Night lighting poses a severe impact on such species and that needs to be a limiting factor in any lighting program.

We urge you to update our environmental planning to include Dark Sky principles for the health of both people and wildlife. In the current proposed Local Coastal Program Amendment, please specify that the lighting shall employ the most current Dark Sky lighting principles¹ and up-to-date lighting systems, in order to minimize the negative impacts of artificial light on people and wildlife, and to preserve the natural beauty and habitat of the area.

We also encourage the plan to support safe trails for people to access the beach at location that prevent further erosion and impacts to wildlife. This is a critical problem on the bluffs from Sloat Blvd. southward to Fort Funston. The rapidly eroding bluffs prevent any thought of a permanent trail or stairway. Each season the shoreline access should be evaluated and well-defined access paths developed. Another option is to consider temporary stairways. In particular, the plan should recognize and protect the Bank Swallow colony, overwintering Burrowing Owls, and many species of shorebirds that depend upon this habitat. Educational signage in multiple languages is needed to inform people about this site. It is important to inform the public about these local species and why it is important to stay on trails, keep domestic pets on leash, and to properly dispose of pet waste and/or trash in wildlife proof containers.

Thank you for the opportunity to express our support for our local environment. If you would like to discuss this further, please do not hesitate to contact me at (510) 843-2222.

Sincerely,



Cindy Margulis
Executive Director

Cc: Mr. Chris Kern chris.kern@sfgov.org
Mr. Dan Murphy murphsf@comcast.net

¹ See <http://darksky.org/lighting/model-lighting-laws-policy/> and <http://darksky.org/lighting/led-practical-guide/>

Responses to Western Shoreline Area Plan/Local Coastal Program Comments and Questions

Public Comment Received Before and After March 2nd Initiation Hearing

SCOPE OF THE AMENDMENT

COMMENTER	PUBLIC COMMENT	CITY RESPONSE
Sierra Club San Francisco Bay-2	Add new: Policy 12.7 All new projects, maintenance or improvements to existing structures or infrastructure shall use only the minimum lighting needed for personal safety. This lighting shall employ the most current Dark Sky lighting principles and up-to-date lighting systems, in order to minimize the negative impacts of artificial light on people and wildlife, and to preserve the natural beauty and habitat of the area.	The scope of this amendment is limited to coastal hazards. Existing LCP policies address habitat and coastal resource protection.
Golden Gate Audobon Society-1	We urge you to update our environmental planning to include Dark Sky principles for the health of both people and wildlife. In the current proposed Local Coastal Program Amendment, please specify that the lighting shall employ the most current Dark Sky lighting principles and up-to-date lighting systems, in order to minimize the negative impacts of artificial light on people and wildlife, and to preserve the natural beauty and habitat of the area.	The scope of this amendment is limited to coastal hazards. Existing LCP policies address habitat and coastal resource protection.
Bill McLaughlin Surfrider Foundation San Francisco Chapter-1	Overall, we are very concerned about the lack of sequential ordering in the draft, which outlines the work we will need to fix the erosion mess...Whether it is LMT relocation or the Ocean Beach Master Plan	Please see revised policies, released May X, 2017. The proposed amendment identified short term implementation actions in policy 12.1. The remaining policies do not have a chronological order because they are ongoing or they apply to different types of projects.

	recommended low profile seawall, Surfrider believes the long-term plan should be found at the very top of the list as the protection project keys the rest of the work needed, including long-term beach and access restoration.	
Goodman-1	The proposed changes directly add to congestion on Sloat, and will relay traffic that prior went directly to the highway route south on the Pacifica and Daly City ridge line around to Sunset Blvd. What other considerations have been made to alleviate the transit impacts by re-linking the older L-Taraval line along Sloat back to St. Francis Circle, or directly to sunset blvd. and southbound to the west side of Stonestown, SFSU-CSU and Parkmerced's developments either routing up Holloway, or out to John Daly Blvd. to provide direct new transit services to these developments and the apartment and condo developments around Lake Merced? ... With increased developments at GGP Stonestown, SFSU-CSU, and Parkmerced it behooves us all to think more long-range on planning the adequate transit connectivity improvements especially when a roadway is removed or discontinued.	This amendment and its implementation have been developed in conjunction with SFMTA and Public Works. Although the scope of this amendment is limited to coastal hazards, the Community Advisory Group and Interagency Committee have discussed impacts on nearby neighborhoods and projects.
Goodman-2	Many of the naturalist areas, for snowy plover and other migratory birds were directly impacted by the beach chalet soccer fields, what ways will plant and animal concerns be addressed in the area due to the prior impacts.	The scope of this amendment is limited to coastal hazards. Existing LCP policies address habitat and coastal resource protection.
Goodman-3	We often go to the beach from the	The scope of this amendment is limited to

	<p>excelsior, and as the muni and bus services do not provide adequate direct connectivity and frequent service we drive to the side street east of the great highway and park to walk across to the promenade. The increased traffic that will occur and development pressures on the west-side require out of the box thinking on how people use and access the water-front area.</p>	<p>coastal hazards. Existing LCP policies address improving public transportation options to and within the coastal zone.</p>
--	---	---

EXISTING CONDITIONS

	PUBLIC COMMENT	CITY RESPONSE
Veit-1	<p>1. One Lane each way, with multi-use trail on Outer Great Hwy is preferred:</p> <p>a. As someone who lives on the great highway, I just wanted to say that many of us support taking the outer Great Highway down to one lane in each direction. Providing a multi-use trail will be a huge benefit.</p> <p>b. As a civil engineer, I would like to point out that throughput need not suffer greatly. As it stands now, it's often closed entirely and the impact to lower great highway is not that bad.</p> <p>c. As a neighborhood watch captain, I can represent that many of the folks who live here concur. The current situation lends itself to racing, running red lights, and is probably less safe than a "one lane in each direction" alternative.</p>	<p>Although the Local Coastal Program does not identify a particular interim road configuration, Public Works and SFMTA are working on designs for the Great Highway between Sloat and Skyline Boulevard. No traffic changes are proposed north of Sloat Boulevard. The proposed amendments would support safety and bicycle/pedestrian infrastructure improvements like this.</p>
Veit-3	<p>3. Lower Great Hwy where it meets skyline needs control:</p> <p>The intersection of Skyline and lower great highway is treacherous. I took some kids on a field trip to the Sewage Treatment plant and it was really hectic, just extremely dangerous. Northbound traffic on skyline doesn't stop at all, ever... For many miles. We don't need lights that operate all the time, but a traffic circle there with</p>	<p>Although the Local Coastal Program does not identify a specific final road configuration, Caltrans, Public Works and SFMTA are working on designs for the Great Highway between Sloat and Skyline Boulevard. This includes a controlled intersection at Skyline and Great Highway. The proposed amendments would support safety and bicycle/pedestrian infrastructure improvements like this.</p>

	actuated on-demand pedestrian crossing is a necessity.	
Chan-1	<p>Already unsafe elements exist the stretch of Skyline Blvd between Sloat Blvd to Great Hwy.</p> <p>It's CalTrans Hwy 35 and the speed limit is 45 mph — which is totally unsafe for pedestrians crossing. So ironic, the 45mph signage is on the side of the road and "SLOW" is painted on the road. (photo)</p> <p><u>The OBMP Transportation Document shows that evaluation of intersection Level of Service at along Skyline Blvd does not include the T-intersection at Harding Road (which lead into Harding Park/Lake Merced).</u></p> <p>Harding Park (Park & Rec) includes many users & activities: golf, rowers, kayakers, canoers, zumba, birthday parties, fishing, picnickers, dragon boaters. There are many events through out the year. There are many of pedestrians crossing Skyline Blvd at the the north and south ends of Herbst Rd.</p>	<p>Although the Local Coastal Program does not identify a specific final road configuration, Caltrans, Public Works and SFMTA are working on designs for the Great Highway between Sloat and Skyline Boulevard. This includes a controlled intersection at Skyline and Great Highway. The proposed amendments would support safety and bicycle/pedestrian infrastructure improvements including a signalized intersection for Great Highway and Skyline Boulevard.</p>
Holl-3	<p>The [Ocean Beach Master] Plan's authors ignored an 1893 USGS report by one Andrew Lawson which stated that there was a "true sea cliff of the Terrace formations", later called Colma Formations, beneath the sand dunes. In fact, anyone who goes to the beach can see the Colma formation today exposed at Noriega Street.</p>	<p><i>The Coastal Protection Measures & Management Strategy for South Ocean Beach</i> (SPUR et al. 2015) provides information on the horizontal and vertical extent of the Colma formation along the Ocean Beach shoreline. It is true that the Colma formation underlies sandy deposits and artificial fill along portions of the shoreline – in fact, the Lake Merced Tunnel was bored through the Colma formation in the vicinity of the Oceanside Treatment Plant. However, the Colma formation is not exposed at Noriega Street. The following image from the California Coastal Records Project shows exposed artificial fill and concrete rubble, which is likely what the commenter is referring to</p> <p>(http://www.californiacoastline.org/cgi-bin/image.cgi?image=201007749&mode=big).</p>

		Regardless, the presence or absence of Colma formation at Noriega has negligible influence on the proposed actions along this stretch of beach.
--	--	---

EROSION CONTROL AND MANAGED RETREAT

	PUBLIC COMMENT	CITY RESPONSE
Veit-2	<p>Lower Great Hwy Eventual Closure due to sea level encroachment is ok:</p> <p>a. Lower great highway is already one lane southbound and will soon be one lane in each direction and soon after that closed entirely. So be it.</p> <p>b. The possibility of a dedicated trail from funston along the great highway all the way to the cliff house / batteries to bluffs connection and beyond is awesome.</p>	The proposed Local Coastal Program will support projects like this, but the projects will be proposed and implemented by other agencies (GGNRA, SF Public Works, SF Rec and Parks, SFPUC).
Sierra Club San Francisco Bay-2	Delete lines 20- 25, Page 6, and replace with: New development shall be discouraged in areas that would be exposed to an increased risk of flooding due to sea level rise, unless it can be demonstrated that the new development will not require further shoreline armoring in the future and unless the developer can provide assurances that they will be responsible for the costs if such armoring proves necessary. All substantial improvements to existing development shall be designed and constructed to assure no added risks to life and property due to flooding, and the developer shall provide assurances that they will be	Due to San Francisco's unique shoreline configuration, private property owners neither own nor maintain shoreline protection devices. Homeowners and business owners may receive de facto shoreline protection due to the Great Highway or wastewater infrastructure, but the city owns and maintains those facilities for public purposes. In addition, no buildings are exposed to current coastal flood risk and only seven buildings (including public facilities) are predicted to experience temporary flooding until after 2050 (given 24" of sea level rise in 2050, a high end estimate). Requiring expensive and disruptive retrofitting for floods that are decades away does not further the goals of the Local Coastal Program.

	responsible for any shoreline armoring costs the improvements may require in the future.	
Golden Gate Audobon Society-2	We also encourage the plan to support safe trails for people to access the beach at location that prevent further erosion and impacts to wildlife. This is a critical problem on the bluffs from Sloat Blvd. southward to Fort Funston. The rapidly eroding bluffs prevent any thought of a permanent trail or stairway. Each season the shoreline should be evaluated and well-defined access paths developed. Another option is to consider temporary stairways. In particular, the plan should recognize and protect the Bank Swallow colony, overwintering Burrowing Owls, and many species of shorebirds that depend upon this habitat. Educational signage in multiple languages is needed to inform people about this site. It is important to inform the public about these local species and why it is important to stay on trails, keep domestic pets on leash, and to properly dispose of pet waste and/or trash in wildlife proof containers.	<p>Current Local Coastal Program policies support the development of trails and other recreation facilities in environmentally-responsible ways, e.g., POLICY 9.1 Maximize the natural qualities of Fort Funston. Conserve the ecology of entire Fort and develop recreational uses which will have only minimal effect on the natural environment.</p> <p>Revised policy 12.4 also identifies appropriate locations for public access facilities given projected sea level rise and erosion rates.</p>
Surfrider-2	Surfrider supports the change in policy that calls managed retreat of the road and parking lots. We believe it important that we do this in two phases due to the time needed to fund, permit and build the long-term plan.	The LCP does not endorse a particular physical configuration for the roadway. SF Public Works, MTA, Rec and Parks and SFPUC are reviewing construction alternatives and timelines in order to protect wastewater infrastructure and provide recreation access safely. Current plans include a two phase process, depending on erosion and construction timelines.
Surfrider -3	We support the need for managed retreat of infrastructure because engineers that have studied	The proposed amendments support a hybrid approach to coastal management south of Sloat Boulevard. The amendment calls for removal of existing debris, rubble, armoring, and artificial fill from the shoreline south of

	<p>the erosion site believe sand dunes can no longer serve as effective protection. Additional beach area is also needed so that sand dunes can be more effective as protection for a longer period of time while preserving the beach.</p> <p>...</p> <p>The LCP must also clearly identify managed retreat as the preferred, long-term strategy to address erosion of Ocean Beach.</p>	<p>Sloat Boulevard. In the vicinity of the Oceanside Treatment Plant, beach nourishment would provide dynamic protection of the bluff and prevent waves from directly attacking the bluff. Removal of the Great Highway in this area will provide more room for natural coastal processes and recontouring of the shoreline to make it less prone to erosion. In addition, low-profile protection will be installed in the bluff seaward of the Lake Merced Tunnel to protect it and areas behind it from erosion and flooding during times when sand is temporarily eroded from the beach (for example, during the winter). This requires some flexibility for new development in the erosion zone, as per Coastal Commission policy any of the above activities would require a Coastal Development Permit. Exceptions could also be granted for temporary public access facilities, see new Policy 12.4.</p>
Surfrider -4	<p>Modify Policy 12.4 - At the end of line 19: "Less environmentally damaging alternatives cannot be rejected as infeasible on cost alone."</p>	<p>Feasibility includes impacts to coastal resources but also private and public property uses and cost. Policies 12.5 and 12.6 identify limitations for the use and construction of shoreline protective devices.</p>
Holl-1	<p>Recommendations in the plan will accelerate erosion of the natural shoreline at Ocean Beach at a cost of hundreds of millions of dollars.</p>	<p>It is true that given the magnitude of issues and competing goals addressed by the Ocean Beach Master Plan, there are no simple and cheap solutions. That said, the coastal engineers, scientists, and planners that developed the plan have demonstrated that its recommendations will slow ongoing coastal erosion and provide protection of critical wastewater infrastructure, all while providing continued public access to the beach and ecosystem benefits. These recommendations are based on the best available science and years of research, analysis, monitoring, and modeling of the Ocean Beach shoreline and other managed retreat projects in California.</p>

Holl-2	<p>The strategy of managed retreat allows dry land to be flooded by the sea. The justification for this strategy is the Olmsted Study. This study incorrectly concluded that the western shoreline was pushed 200 feet seaward of its natural equilibrium.</p>	<p>The managed retreat strategy proposed by the Ocean Beach Master Plan is more than just allowing dry land to be flooded. The motivation for a managed retreat strategy is to work with nature and allow coastal processes to operate in a dynamic and natural environment. This strategy is in contrast to the decades-old strategies that attempted to fight nature and maintain the beach in an unnatural state. Careful evaluation of historical maps, photographs, news articles, and reports clearly demonstrates that the Ocean Beach shoreline was indeed pushed seaward by 200 to 300 ft from its natural position through re-grading of natural sand dunes and placement of debris and fill during the 20th century (Battalio and Trivedi 1996; Olmsted and Olmsted 1979; McLaughlin 20105; http://ww2.kqed.org/quest/wp-content/uploads/sites/39/2013/02/map.jpg). Managed retreat strategies have been successfully implemented at multiple locations along the California coast, including Pacifica (Linda Mar beach) and Ventura (Surfers Beach).</p>
Holl-4	<p>Regarding the Ocean Beach Master Plan's proposed actions south of Sloat Boulevard:</p> <p>"Their solution calls for removal of all armoring at south Ocean Beach, allowing the ocean to erode the natural land there."</p>	<p>It is true that implementation of the Ocean Beach Master Plan would remove debris, rubble, and armoring that is currently protecting the backshore area along some sections of south Ocean Beach; however, much of this land is not "natural land" and is instead composed of rubble and fill that was placed there over the course of the 21st century. It is this artificial fill that has suffered erosion over many decades. While some armoring would be removed, a new coastal protection structure would be built adjacent to and overtop of the Lake Merced Tunnel to protect it from wave and erosion damage. This hard protective structure would be augmented by a cobble berm and regular sand nourishment of the fronting beach and recontouring of the shoreline to create a natural coastal system that is more resilient to coastal storm attack than the existing shoreline.</p>
Holl-5	<p>The Plan calls for a cobblestone berm to be placed adjacent to the Wastewater Treatment Plant for protection after the rock revetments have been removed. Interestingly, the Plan itself contains the</p>	<p>The Ocean Beach Master Plan calls for removal of existing debris, rubble, armoring, and artificial fill from the shoreline south of Sloat Boulevard. In the vicinity of the Oceanside Treatment Plant, beach nourishment would provide dynamic protection of the bluff and prevent waves from directly attacking the bluff. Because the bluff is made of more resistant Colma formation, it will be less susceptible to erosion from</p>

	information that cobblestone berms do not provide complete protection from erosion by wave action and the evidence is at the beach today. In effect, implementation of the Plan will mean that the Wastewater Treatment Plant will be flooded by the sea decades sooner than if the rock revetments were to remain in place.	waves than the existing fill material. Removal of the Great Highway in this area will provide more room for natural coastal processes and recontouring of the shoreline to make it less prone to erosion. In addition, a low-profile wall (similar to the Taraval seawall) will be installed in the bluff seaward of the Lake Merced Tunnel to protect it and areas behind it from erosion and flooding during times when sand is temporarily eroded from the beach (for example, during the winter).
Holl-6	Mr. Kern has been quoted saying that managed retreat will provide a wider beach for a longer time than if there is no retreat. That is simply wishful thinking with no basis in science or in the Plan.	Other managed retreat projects along the California coast (such as Pacifica [Lindar Mar] and Ventura [Surfers Beach]) have shown that setting back infrastructure and removing artificial fill are effective strategies to restore coastal processes and work with nature as opposed to against it. When the beach and dune system is allowed to function naturally a wider beach can exist compared to shorelines where a hard backstop, such as a revetment or seawall, exists. The armored shoreline south of Sloat Boulevard highlights the narrowing of the beach that can occur under conditions where the beach is not allowed to respond naturally to changing ocean conditions. Continued beach nourishment south of Sloat Blvd is an important part of the proposed actions and will facilitate maintaining a wider beach in the future.
Holl-7	Doing managed retreat will not provide a beach, it will not improve the waves, and it will increase the risk of erosion at the Wastewater Treatment Plant.	See response to comment Holl-6 regarding the effectiveness of managed retreat strategies and proposed beach nourishment to maintain a sandy beach. See response to comment Holl-5 regarding coastal protection and erosion risk at the Oceanside Treatment Plant.
Holl-8	These amendments are a radical change from the existing LCP which calls for armoring the whole shoreline.	The existing Western Shoreline Plan does not call for armoring of the entire shoreline and the proposed amendments do not represent a radical change from the existing policies. For example, Objective 6 of the Western Shoreline Plan calls for the City to “maintain and enhance the recreational use of San Francisco’s Ocean Beach” and includes policies aimed at

		<p>maintaining Ocean Beach as a natural area for public recreation, improving and stabilizing the sand dunes with natural materials to control erosion, and keeping the natural appearance of the beach and maintaining the beach in a state free of litter and debris. The proposed amendments actually further reinforce these goals and provide a plan to achieve them.</p>
Surfrider-1	<p>In 1986, the Coastal Commission certified the first LCP, which was then called the Western Shoreline Plan. That same year, the Coastal Commission also ratified a document called the City and County of San Francisco's Ocean Beach Beach Nourishment Plan (see attached). The Beach Nourishment document is essentially the current erosion control policy for Ocean Beach. It came into being under a mandate by the California Coastal Commission as a condition for approving the wastewater infrastructure at Ocean Beach. Among other issues, the 1986 approved Beach Nourishment Plan spells out exactly how the City would respond to beach erosion as it threatens that infrastructure. According to Coastal Commission staff, the Beach Nourishment document is still in force. However, there is neither mention of it nor clear evidence of its role in the current LCP amendment draft or supplementary materials.</p>	<p>According to a 1992 Coastal Commission Status Update on this plan, the City was fulfilling its obligations to work cooperatively with the Army Corps of Engineers to identify possible solutions to Ocean Beach erosion. In 1992 the Reconnaissance Study was completed and concrete seawalls and beach nourishment were both removed from further consideration. The plan required the city to work with the Army Corps of Engineers, which the city has done and continues to do. As policy 12.3 states, the City is still pursuing beach nourishment but cannot implement the action without the cooperation and support of the Army Corps of Engineers. The 1986 Beach Nourishment Plan and the 1992 Status Update were both used as background documents for the development of this amendment.</p>

SHORLINE PROTECTIVE DEVICES

COMMENTER	PUBLIC COMMENT	CITY RESPONSE
Surfrider-5	The LCP must clarify hard armoring as a tool of last resort, to be employed only in the case of emergencies (clearly defined), and must have a deadline for removal and replacement by softer solutions such as new sand dunes when the emergency permit expires.	Policies 12.5 and 12.6 identify when and where shoreline protective devices may be permitted and how they should be constructed. Policy 12.6 also states that permits for shoreline protective devices should only persist for the live of the structure the device protects.
Surfrider-6	Include language that reflects the Coastal Commission's Sea Level Rise Policy Guidance document recommendations. Please add the following: "Soft solutions, such as sand dune replenishment are preferred over armoring in emergencies. Any emergency armoring must have a deadline for removal and replacement by softer solutions such as sand dunes once the emergency permit expires and is limited to existing development."	Policies 12.5 and 12.6 identify when and where shoreline protective devices may be permitted and how they should be constructed. Policy 12.6 also states that permits for shoreline protective devices should only persist for the live of the structure the device protects.



SAN FRANCISCO PLANNING DEPARTMENT

To: California Coastal Commission
From: San Francisco Planning Department
Subject: Coastal Commission Comments on Proposed Western Shoreline Area Plan/Local Coastal Program Amendment
Date: May 10, 2017
CC: City Attorney's Office, Land Use Division

1650 Mission St.
Suite 400
San Francisco,
CA 94103-2479

Reception:
415.558.6378

Fax:
415.558.6409

Planning
Information:
415.558.6377

COASTAL COMMISSION COMMENTS ON PROPOSED COASTAL HAZARD AMENDMENTS TO SAN FRANCISCO'S LOCAL COASTAL PROGRAM/WESTERN SHORELINE AREA PLAN

In 2015, the San Francisco Planning Department secured funding from the California Coastal Commission and the Ocean Protection Council to lead the effort to amend the Western Shoreline Area Plan, San Francisco's Local Coastal Program, specifically to address climate change, sea level rise, and coastal erosion concerns.

Throughout the amendment process, Planning has worked with Coastal Commission staff to manage the grant, scope and research the amendment, and develop policy language that meets local and state coastal management goals. Although there are extensive areas of agreement and the current policy language includes many of the Coastal Commission staff's suggested modifications, there are areas of remaining disagreement. See below for the Planning Department's responses to Coastal Commission staff comments provided on March 24th, 2017 and revised on April 28th, 2017. Coastal Commission and Planning Department staff met to discuss these comment on April 20th, 2017. Coastal Commission staff comments are in italics, city response in plain text, and policy language is underlined.

Overall, we would still have preferred a more comprehensive update to the entire LCP and clean-up of other sections as previously proposed but we do recognize the reduced scope of this work.

We continue to recommend that the City include details on the other key moves from the Ocean Beach Master Plan in 12.2 so that all of that good work will not be lost in the consideration of adaptation plans.

The scope of this amendment, as identified in the grant application and work program, is limited to coastal hazards in order to facilitate near term adaptation measures south of Sloat Boulevard. A future update could incorporate work completed during the Ocean Beach Master Plan process and comments collected during this amendment addressing other policies, resources, and objectives. The Ocean Beach Master Plan is also included as an attachment to the staff report for this amendment.

Throughout the proposed LCP, the use of the term "should" should be changed to "shall".

The City's General Plan, of which the Western Shoreline Area Plan/Local Coastal Program is a part, does not use this convention in order to maintain flexibility for balancing multiple General Plan objectives and individual project constraints. Nevertheless, in response to Coastal Commission staff comments, the city has accepted this change in policies 12.2 and 12.3 and in portions of policies 12.4, 12.5, and 12.6.

For proposed LCP Policy 12.1, although much of the adaptation strategies south of Sloat have been determined and detailed within this policy, we recommend adding a commitment to continue adaptation planning efforts south of Sloat in the future as conditions change.

Accepted. New policy language:

Policy 12.2. Develop and Implement Sea Level Rise Adaptation Plans for the Western Shoreline.

Sea level rise and erosion threaten San Francisco's coastal resources and their impacts will worsen over time. San Francisco shall use the best available science to support the development of adaptation measures to protect our coastal resources in response to sea level rise and coastal hazards.

Implementation Measures:

a) Conduct detailed sea level rise vulnerability assessments and develop adaptation plans to minimize risks to life, property, essential public services, public access and recreation, and scenic and natural resources from shoreline erosion, coastal flooding and sea level rise for the Western Shoreline Area.

The parsing out of the Coastal Act 30253 language in 12.4 misses some hazards and may limit redevelopment of public infrastructure (public roads, sidewalks, public utilities) and public recreational access facilities (public parks, restroom facilities, trails) which may be ok in hazard areas in the short term. We recommend modifying this policy to better illustrate what this policy means for the SF Coastal Zone. You may want to add a specific section to the policy or a new policy rather than just rewording what already exists. See the attached document for some sample policy language previously sent for your consideration which may address this issue.

Accepted. New policy language here:

Public recreational access facilities (e.g., public parks, restroom facilities, parking, bicycle facilities, trails, and paths), public infrastructure (e.g., public roads, sidewalks, and public utilities), and coastal-dependent development shall be sited and designed in such a way as to limit potential impacts to coastal resources over their lifetime. As appropriate, such development may be allowed within the immediate shoreline area only if it meets all of the following criteria:

1. The development shall be sited and designed to be easily relocatable and/or removable without significant damage to shoreline and/or bluff areas.
2. The development shall only be allowed when it will not cause, expand, or accelerate instability of a bluff.

The requirements outlined in 12.6 should be requirements of all approved shoreline protective devices. Consider merging with 12.5 or changing the title to "Requirements for Shoreline Protective Devices".

Accepted. New policy language here:

Policy 12.6. Minimize impacts of Shoreline Protection Devices.

We continue to recommend the use of "redevelopment" or in the very least, expansion of the definition of "substantial improvements" consistent with redevelopment for the purposes of the proposed LCP hazard policies, consistent with the statewide approach on this subject. See the attached document for the proposed definition.

The proposed amendment identifies requirements for "new development and substantial improvements to existing development" which is consistent with San Francisco's Floodplain Management Ordinance

and Federal Emergency Management Agency standards. Under this definition substantial improvements include any reconstruction, rehabilitation, addition, or other proposed new development of a structure, the cost of which equals or exceeds 50 percent of the market value of the structure before construction of the improvement. The Coastal Commission staff has suggested using the term redevelopment which they define as,

“An existing structure in an area potentially subject to hazards shall be considered redeveloped when such development consists of: (1) alteration (including interior and/or exterior remodeling and renovations, demolition or partial demolition, etc.) of 50% or more of major structural components (including exterior walls, floor and roof structure, and foundation) considered individually (i.e., percentages are calculated by the individual structural component being altered, and are not additive between different structural components); (2) additions and alterations to such development that lead to a 50% or more increase in floor area for the development; and/or (3) additions and alterations to such development that costs 50% or more of the market value of the existing structure before construction. Changes to floor area and individual major structural components and the costs of such changes are measured cumulatively over time starting with certification of this LCP update.”

The Planning Department does not recommend this approach because this calculation method does not match other city policies, recording and calculating these methods would be a burden for property owners and project approvals, and these requirements could discourage necessary maintenance efforts for fear of triggering expensive flood risk mitigation requirements. This distinction is important for both public and private property given Coastal Commission policy to only allow shoreline protection devices for existing development. Under the Coastal Commission definition, many existing structures could become “new development” given modest maintenance and improvements over time.

Shoreline protective devices in the San Francisco Coastal Zone are entirely on public land and protect critical public infrastructure. Private property on the east side of the Great Highway consists of fully built out urban development on small lots (typically 2,500-5,000 square feet). These neighborhoods, which were developed in the 1940s and 1950s, are set back several hundred feet from the shoreline, and are located inland of the Great Highway and the Westside Transport (a major component of the City’s sewer system) and the existing O’Shaughnessy, Taraval, and Noriega seawalls built to protect these facilities. While private property owners in the western edge of the Richmond and Sunset neighborhoods may benefit from de facto shoreline protection provided by the existing seawalls and the Great Highway in the future under end-of-century sea level rise and 100-year coastal storm conditions, these private property owners do not own or maintain these structures. This recommended change does not reflect the existing conditions of San Francisco’s Coastal Zone.

There is inconsistency throughout the LCPA with the use of the terms “shoreline protective devices”, “shoreline armoring”, and “shoreline armoring structures”. Please use one term uniformly through the document using “shoreline protective device” as our recommendation.

Accepted and modified throughout the proposed policies and supporting documents.

We also recommend adding language to 12.6 to tie the authorization of shoreline protective devices to the life of the structure they protect.

Accepted, new policy language here:

Coastal permits issued for shoreline protective devices shall authorize their use only for the life of the structure they protect.

No new major critical public infrastructure shall be allowed within an area potentially subject to coastal hazards, including any mapped hazard area. To the maximum extent feasible, existing major critical public infrastructure shall be relocated outside of areas subject to coastal hazards.

The proposed amendment identifies a hybrid managed retreat strategy for South Ocean Beach. This approach will improve the condition and sustainability of the beach by removing rubble and creating landward space by removing parking lots and eventually the Great Highway between Sloat Boulevard and Skyline Boulevard. The proposed amendment supports protecting the wastewater treatment plant and associated infrastructure from erosion while minimizing environmental impacts but does not commit to relocating the wastewater infrastructure now or in the future.

As part of developing the amendment, the Planning Department commissioned a technical memorandum on coastal erosion and sea level rise projections in order to predict possible future hazards. The city mapped both mid-range and high-end projections through 2100. This study was not intended to set regulatory boundaries for 2100 today, but rather to begin forecasting potential risks and conducting long-range planning. This approach is consistent with state guidance on adaptation planning which encourages the use of multiple scenarios and planning horizons and prioritizes adaptive capacity to implement policy changes and projects over time. The Planning Department believes the Coastal Commission's suggested language does not differentiate between levels of risk and does not allow sufficient flexibility for adaptation over time.

Planning Department staff will continue to work with Coastal Commission staff to address these issues before the Planning Commission Adoption hearing on June 8th and after the Local Coastal Program amendment is submitted to the Coastal Commission for certification. Please see below for the full text of the proposed amendment with the modifications addressed in this memo.

FILE NO.

ORDINANCE NO.

[General Plan - Western Shoreline Area Plan (Local Coastal Plan) Amendment]

Style Definition: Comment Text

Ordinance amending the Western Shoreline Area Plan of the San Francisco General Plan, San Francisco's Local Coastal Program Land Use Plan, to add an objective to preserve, enhance, and restore the Ocean Beach shoreline while protecting public access, scenic quality, natural resources, critical public infrastructure, and existing development from coastal hazards; affirming the Planning Department's determination under the California Environmental Quality Act; and making findings of consistency with the General Plan and the eight priority policies of Planning Code Section 101.1.

NOTE: **Unchanged Code text and uncodified text** are in plain Arial font.
Additions to Codes are in single-underline italics Times New Roman font.
Deletions to Codes are in ~~strikethrough italics Times New Roman font~~.
Board amendment additions are in double-underlined Arial font.
Board amendment deletions are in ~~strikethrough Arial font~~.
Asterisks (* * * *) indicate the omission of unchanged Code subsections or parts of tables.

Be it ordained by the People of the City and County of San Francisco:

Section 1. Findings.

(a) Charter Section 4.105 and Planning Code Section 340 provide that the Planning Commission shall periodically recommend to the Board of Supervisors, for approval or rejection, proposed amendments to the San Francisco General Plan.

(b) Planning Code Section 340 provides that an amendment to the General Plan may be initiated by a resolution of intention by the Planning Commission, which refers to, and incorporates by reference, the proposed General Plan amendment. Section 340 further provides that the Planning Commission shall adopt the proposed General Plan amendment after a public hearing if it finds from the facts presented that the public necessity, convenience and general welfare require the proposed amendment or any part thereof. If adopted by the

Commission in whole or in part, the proposed amendment shall be presented to the Board of Supervisors, which may approve or reject the amendment by a majority vote.

(c) Pursuant to Planning Code Section 340, the Planning Commission initiated this amendment on _____, 2017, in Motion No. _____. Pursuant to Planning Code Section 340 and Charter Section 4.105, the Planning Commission adopted this amendment to the Western Shoreline Area Plan of the General Plan on _____, 2017 in Resolution No._____, finding that this amendment serves the public necessity, convenience and general welfare, and is in conformity with the General Plan and the eight Priority Policies in Planning Code Section 101.1.

(d) The Planning Department has determined that the actions contemplated in this ordinance are exempt from the California Environmental Quality Act (Public Resources Code Sections 21000 et seq.) pursuant to Public Resources Code Section 21080.9. Said determination is on file with the Clerk of the Board of Supervisors in File No. _____ and is incorporated herein by reference. The Board affirms this determination.

(e) The _____, 2017 letter from the Planning Department transmitting the proposed amendments to the Western Shoreline Area Plan of the General Plan, and the resolutions adopted by the Planning Commission with respect to the approval of this General Plan amendment, are on file with the Clerk of the Board of Supervisors in File No. _____.

(f) The Board of Supervisors finds, pursuant to Planning Code Section 340, that this General Plan amendment, set forth in the documents on file with the Clerk of the Board in File No._____, will serve the public necessity, convenience and general welfare for the reasons set forth in Planning Commission Resolution No. _____ and incorporates those reasons herein by reference.

(g) The Board of Supervisors finds that this General Plan amendment, as set forth in the documents on file with the Clerk of the Board in Board File No._____, is in

conformity with the General Plan and the eight priority policies of Planning Code Section 101.1 for the reasons set forth in Planning Commission Resolution No. _____. The Board of Supervisors also finds and certifies that this General Plan amendment is intended to be carried out in a manner fully in conformity with the California Coastal Act, for the reasons set forth in Planning Commission Resolution No. _____. The Board hereby adopts the findings set forth in Planning Commission Resolution No. _____ and incorporates those findings herein by reference.

(h) After this General Plan amendment is adopted, it will be submitted to the California Coastal Commission for review and certification of consistency with the California Coastal Act of 1976 (Public Resources Code 30000 et seq.) as a proposed amendment to San Francisco's Local Coastal Program Land Use Plan. If the California Coastal Commission approves the Local Coastal Program amendment as submitted, it will take effect immediately upon certification. If the California Coastal Commission certifies the Local Coastal Program amendment subject to ~~conditions~~modifications, final approval by the Planning Commission and the Board of Supervisors shall be required prior to the amendment taking effect.

Section 2. The San Francisco General Plan is hereby amended by adding a new Objective 12 to the Western Shoreline Area Plan, as follows:

COASTAL HAZARDS

OBJECTIVE 12

PRESERVE, ENHANCE, AND RESTORE THE OCEAN BEACH SHORELINE WHILE PROTECTING PUBLIC ACCESS, SCENIC QUALITY, NATURAL RESOURCES, CRITICAL PUBLIC INFRASTRUCTURE, AND EXISTING DEVELOPMENT FROM COASTAL HAZARDS

Policy 12.1. Adopt Managed Retreat Adaptation Measures Between Sloat Boulevard and Skyline Drive.

Erosion of the bluff and beach south of Sloat Boulevard has resulted in damage to and loss of beach parking and portions of the Great Highway, and threatens critical wastewater system infrastructure. Sea level rise will likely exacerbate these hazards in the future. The City ~~should~~shall pursue adaptation measures to preserve, enhance, and restore public access, scenic quality, and natural resources along Ocean Beach south of Sloat Boulevard and to protect wastewater and stormwater infrastructure from impacts due to shoreline erosion and sea level rise.

Implementation Measures:

(a) As the shoreline retreats due to erosion and sea level rise, incrementally remove shoreline ~~armorings~~protection devices, rubble that has fallen onto the beach, roadway surfaces, and concrete barriers south of Sloat Boulevard.

(b) Relocate public beach parking and public restrooms to areas that will not be affected by shoreline erosion or sea level rise for the foreseeable future. The relocated facilities should not require the construction of shoreline ~~armorings~~protection devices and should be relocated if they are threatened by coastal hazards in the future.

(c) Close the Great Highway between Sloat and Skyline boulevards and reroute traffic to Sloat and Skyline boulevards.

(d) Import sand to restore the beach and construct dunes. Stabilize dunes with vegetation, beach grass straw punch, brushwood fencing, or other non-structural methods.

(e) Extend the coastal trail to Fort Funston and Lake Merced by constructing a multi-use public access pathway along the shoreline from Sloat Boulevard to Skyline Boulevard.

(f) Permit shoreline protection ~~structures~~devices if necessary to protect coastal water quality and public health by preventing damage to wastewater and stormwater infrastructure due to shoreline erosion ~~and~~only when less environmentally damaging alternatives are determined to be infeasible.

(g) Maintain service vehicle access necessary for the continued operation and maintenance of existing wastewater and stormwater infrastructure systems.

Policy 12.2. Develop and Implement Sea Level Rise Adaptation Plans for the Western Shoreline ~~North of Sloat Boulevard.~~

Sea level rise and erosion threaten San Francisco's coastal resources and their impacts will worsen over time. San Francisco ~~should~~shall use the best available science to support the development of adaptation measures to protect our coastal resources in response to sea level rise and coastal hazards.

Implementation Measures:

a) Conduct detailed sea level rise vulnerability assessments and develop adaptation plans to minimize risks to life, property, essential public services, public access and recreation, and scenic and natural resources from shoreline erosion, coastal flooding and sea level rise for the Western Shoreline Area.

b) The vulnerability assessments ~~should~~shall be based on sea level rise projections for likely and worst-case mid-century and end-of-century sea level rise in combination with a 100-year storm event, and shall include one or more scenarios that do not rely on existing shoreline ~~armoring~~protection devices.

c) Adaptation measures ~~should~~shall be designed to minimize impacts on shoreline sand supply, scenic and natural resources, public recreation, and coastal access.

d) The adaptation plans ~~should~~shall consider a range of alternatives, including protection, elevation, flood proofing, relocation or partial relocation, and reconfiguration.

e) Adaptation measures that preserve, enhance, or restore the sandy beach, dunes, and natural and scenic resources such as beach nourishment, dune restoration, and managed retreat ~~should~~shall be preferred over new or expanded shoreline ~~armoring~~protection devices.

4 f) Create and maintain sea level rise hazard maps to designate areas within the coastal zone
2 that would be exposed to an increased risk of flooding due to sea level rise. The maps ~~should~~shall
3 include likely and worst case mid-century and end-of-century sea level rise projections in combination
4 with a 100-year storm event. ~~The maps should~~The maps shall include a scenario that does not include
5 existing shoreline protection devices. The maps shall be updated when new information warranting
6 significant adjustments to sea level rise projections becomes available.

7 **Policy 12.3. Develop and Implement a Beach Nourishment Program to Sustain Ocean**
8 **Beach.**

9 Shoreline erosion has substantially narrowed the sandy beach south of Sloat Boulevard. Sea
10 level rise will likely exacerbate the loss of sandy beach south of Sloat Boulevard and may extend this
11 effect to the north towards the Cliff House. The City ~~should~~shall pursue the development and
12 implementation of a long-term beach nourishment program to maintain a sandy beach along the
13 western shoreline to preserve Ocean Beach as a public recreational resource for future generations
14 and to protect existing public infrastructure and development from coastal hazards.

15 **Implementation Measure:**

16 Work with the U.S. Army Corps of Engineers to develop and implement a beach nourishment
17 program involving the placement of sand dredged from the San Francisco bar navigation channel
18 offshore of the Golden Gate onto Ocean Beach. Other sources of suitable sand for beach nourishment
19 may also be identified and permitted. Sand ~~should~~shall not be removed from stable dunes.

20 **Policy 12.4. Develop the Shoreline in a Responsible Manner.**

21 Sea level rise and erosion impacts will worsen over time and could put private and public
22 development in the Western Shoreline Area at risk of flooding. Given these future impacts, development
23 in the Coastal Zone should be sited ~~away from~~to avoid coastal hazard areas when feasible. If
24 ~~relocation~~avoidance is infeasible, development ~~should~~shall be ~~constructed~~designed to ~~protect~~minimize
25

impacts to public safety and property ~~in the event of~~ from current or future flooding ~~or~~ and erosion without reliance on current or future shoreline protection features.

New development and substantial improvements to existing development located in areas exposed to an increased risk of flooding ~~or erosion~~ due to sea level rise ~~should~~ shall be designed and constructed to minimize risks to life and property ~~due to flooding~~.

New development and substantial improvements to existing development ~~should~~ shall ensure stability and structural integrity, and neither create nor contribute significantly to erosion, geologic instability, or destruction of the site or surrounding area.

New development and substantial improvements to existing development ~~should~~ shall not require the construction of ~~shoreline~~ protective devices that would substantially alter natural landforms along bluffs and cliffs.

Public recreational access facilities (e.g., public parks, restroom facilities, parking, bicycle facilities, trails, and paths), public infrastructure (e.g., public roads, sidewalks, and public utilities), and coastal-dependent development shall be sited and designed in such a way as to limit potential impacts to coastal resources over their lifetime. As appropriate, such development may be allowed within the immediate shoreline area only if it meets all of the following criteria:

1. The development shall be sited and designed to be easy to relocate and/or remove without significant damage to shoreline and/or bluff areas.

2. The development shall only be allowed when it will not cause, expand, or accelerate instability of a bluff.

Policy 12.5. Limit Shoreline ~~Armoring~~ Protection Devices

Shoreline ~~armoring structures~~ protection devices such as rock revetments and seawalls can negatively impact coastal resources by disrupting sand transport and fixing the shoreline in a specific location, leading to the eventual narrowing and ultimate loss of sandy beaches. Such structures are expensive to construct and maintain, may be incompatible with recreational uses and the scenic

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

qualities of the shoreline, and may physically displace or destroy environmentally sensitive habitat areas associated with bluffs, dunes, beaches, and intertidal areas. Because of these impacts, ~~shoreline armoring should~~ Shoreline protection devices shall be avoided and only implemented when less environmentally damaging alternatives are not feasible.

Shoreline ~~armoring structures~~ protection devices such as rock revetments and seawalls ~~may only~~ shall be permitted ~~when~~ only where necessary to protect ~~existing~~ critical infrastructure and existing development from a substantial risk of loss or major damage due to erosion and only ~~when~~ where less environmentally damaging alternatives such as beach nourishment, dune restoration, and managed retreat are determined to be infeasible. New or expanded shoreline ~~armoring structures~~ protection devices should not be permitted solely to protect parking, restrooms, or pedestrian or bicycle facilities.

Policy 12.6. ~~Control Erosion with Minimal Infringement upon the Coastal~~

~~Ecosystem~~ Minimize impacts of Shoreline Protection Devices

Shoreline protection ~~structures~~ devices may be necessary to protect existing infrastructure or development. These shoreline protection ~~structures should~~ devices shall be designed to minimize their impacts on coastal resources while providing adequate protection for critical infrastructure and existing development.

All shoreline ~~erosion control and flood~~ protection ~~structures~~ devices shall be designed and constructed to avoid, minimize, and mitigate impacts on shoreline sand supply, environmentally sensitive habitat areas, scenic quality, public recreation, and coastal access.

Shoreline ~~armoring~~ protection devices shall be designed to blend visually with the natural shoreline, provide for public recreational access, and include proportional mitigation for unavoidable coastal resource and environmentally sensitive habitat impacts.

Coastal permit applications for reconstruction, expansion, or replacement of existing ~~seawalls, revetments, and other~~ shoreline protection devices ~~should~~ shall include a re-assessment of the need for the device, the need for any repair or maintenance of the device, ~~any additional required mitigation for~~

unavoidable impacts to coastal resources and the potential for removal or relocation based on changed conditions. Coastal permits issued for shoreline protective devices shall authorize their use only for the life of the structure they protect.

Section 3. Effective Date. After this General Plan amendment is adopted, it will be submitted to the California Coastal Commission for review and certification of consistency with the California Coastal Act of 1976 (Public Resources Code 30000 et seq.) as a proposed amendment to San Francisco's Local Coastal Program Land Use Plan. If the California Coastal Commission approves the Local Coastal Program amendment as submitted, it will take effect immediately upon certification. If the California Coastal Commission certifies the Local Coastal Program amendment subject to ~~conditions~~modifications, final approval by the Planning Commission and the Board of Supervisors shall be required prior to the amendment taking effect.

APPROVED AS TO FORM:
DENNIS J. HERRERA, City Attorney

By: _____
ANDREA RUIZ-ESQUIDE
Deputy City Attorney

n:\land\as2017\1400566\0117208401194422.docx

Formatted: Font: 8 pt



SAN FRANCISCO PLANNING DEPARTMENT

Draft Planning Commission Resolution No. _____

Western Shoreline Area Plan Amendment

HEARING DATE
June 8, 2017

1650 Mission St.
Suite 400
San Francisco,
CA 94103-2479

Reception:
415.558.6378

Fax:
415.558.6409

Planning
Information:
415.558.6377

Date: June 8, 2017
Case No.: **20142110CWP**
Project Name: **Amending the Western Shoreline Area Plan**
Staff Contact: Maggie Wenger– (415) 575-9126
Maggie.wenger@sfgov.org
Reviewed by: Chris Kern – (415) 575-9037
Chris.Kern@sfgov.org
Recommendation: **Adopt the General Plan Amendments for the Western Shoreline Area Plan.**

ADOPTING AMENDMENTS TO THE GENERAL PLAN TO UPDATE THE WESTERN SHORELINE AREA PLAN TO INCLUDE COASTAL HAZARDS; AFFIRMING THE PLANNING DEPARTMENT’S DETERMINATION UNDER THE CALIFORNIA ENVIRONMENTAL QUALITY ACT; AND MAKING FINDINGS OF CONSISTENCY WITH THE GENERAL PLAN AND THE EIGHT PRIORITY POLICIES OF PLANNING CODE SECTION 101.1.

PREAMBLE

WHEREAS, Section 4.105 of the Charter of the City and County of San Francisco mandates that the Planning Department shall periodically recommend to the Board of Supervisors for approval or rejection proposed amendments to the General Plan;

WHEREAS, The Western Shoreline Area Plan of the General Plan sets forth objectives and policies addressing the conservation of the California coast and its natural and recreation resources;

WHEREAS, San Francisco has committed to proactive and thoughtful sea level rise adaptation planning through the 2016 Sea Level Rise Action Plan;

WHEREAS, Sea level rise will exacerbate current erosion and coastal flood hazards along the city's Western Shoreline which could limit coastal recreation opportunities, damage coastal resources and lead to critical infrastructure damage;

WHEREAS, The Western Shoreline Area Plan does not adequately address erosion and sea level rise coastal hazards, the proposed amendments will add adapting to erosion and sea level rise coastal hazards as an objective with supporting policies to the Western Shorelines Area Plan;

WHEREAS, The proposed amendments balance recreation, coastal resources, and critical infrastructure land uses along our Western Shoreline;

WHEREAS, The Western Shoreline Area Plan is the land use plan portion of San Francisco's certified Local Coastal Program;

WHEREAS, This amendment is intended to be carried out in a manner fully in conformity with the California Coastal Act (Public Resources Code Sections 30512, 30513, and 30519);

WHEREAS, per Planning Code Section 340, on March 2, 2017 the Planning Commission adopted Resolution No. 19863, initiating amendments to the Western Shoreline Area Plan and;

WHEREAS, The proposed amendments are exempt from the California Environmental Quality Act (Public Resources Code Sections 21000 et seq.) pursuant to Public Resources Code Section 21080.9 and;

WHEREAS, the Planning Commission has heard and considered the testimony presented to it at the public hearing and has further considered written materials and oral testimony presented on behalf of Department staff and other interested parties; and

WHEREAS, all pertinent documents may be found in the files of the Department, as the custodian of records, at 1650 Mission Street, Suite 400, San Francisco; and

WHEREAS, the Planning Commission has reviewed the proposed Ordinance; and

MOVED, that the Planning Commission hereby recommends that the Board of Supervisors approve the proposed ordinance.

FINDINGS

Having reviewed the materials identified in the preamble above, and having heard all testimony and arguments, this Commission finds, concludes, and determines as follows:

1. The City and County of San Francisco adopted the Western Shoreline Area Plan as its Local Coastal Program in 1986.
2. The proposed amendments will fulfill the direction outlined in the Ocean Beach Master Plan, the Coastal Commission Sea Level Rise Guidance and San Francisco's Sea Level Rise Action Plan.
3. The Commission supports the proposed amendments because they will ensure that the

Western Shoreline Area Plan reflects the City's sea level rise vision.

5. General Plan Compliance. The Commission finds that the proposed Ordinance is consistent with the General Plan.

6. Planning Code Section 101 Findings. The proposed amendments to the Planning Code are consistent with the eight Priority Policies set forth in Section 101.1 (b) of the Planning Code in that:

1. That existing neighborhood-serving retail uses be preserved and enhanced and future opportunities for resident employment in and ownership of such businesses enhanced;

The proposed amendment would have no adverse effect on neighborhood serving retail uses or opportunities for employment in or ownership of such businesses.

2. That existing housing and neighborhood character be conserved and protected in order to preserve the cultural and economic diversity of our neighborhoods;

The proposed amendment would have no adverse effect on the City's housing stock or on neighborhood character.

3. That the City's supply of affordable housing be preserved and enhanced;

The proposed amendment would have no adverse effect on the City's supply of affordable housing.

4. That commuter traffic not impede MUNI transit service or overburden our streets or neighborhood parking;

The proposed amendment would not result in commuter traffic impeding MUNI's transit service, overburdening the streets or current neighborhood parking.

5. That a diverse economic base be maintained by protecting our industrial and service sectors from displacement due to commercial office development, and that future opportunities for resident employment and ownership in these sectors be enhanced;

The proposed amendment would- not adversely affect the industrial or service sectors or future opportunities for resident employment or ownership in these sectors.

6. That the City achieve the greatest possible preparedness to protect against injury and loss of life in an earthquake;

While the proposed amendment would not adversely affect achieving the greatest possible preparedness against injury and loss of life in an earthquake.

7. That the landmarks and historic buildings be preserved;

The proposed amendment would have no effect on preservation of landmarks or historic buildings.

8. That our parks and open space and their access to sunlight and vistas be protected from development;

The proposed amendment would have no adverse effect on parks and open space or their access to sunlight and vista.

NOW, THEREFORE BE IT RESOLVED, that the Commission hereby recommends that the Board ADOPT the proposed Ordinance to amend Western Shoreline Area Plan of the General Plan.

I hereby certify that the foregoing Resolution was ADOPTED by the City Planning Commission on June 8, 2017

Jonas Ionin
Commission Secretary

AYES:

NOES:

ABSENT:

DATE: June 8, 2017

[General Plan - Western Shoreline Area Plan (Local Coastal Plan) Amendment]

Ordinance amending the Western Shoreline Area Plan of the San Francisco General Plan, San Francisco's Local Coastal Program Land Use Plan, to add an objective to preserve, enhance, and restore the Ocean Beach shoreline while protecting public access, scenic quality, natural resources, critical public infrastructure, and existing development from coastal hazards; affirming the Planning Department's determination under the California Environmental Quality Act; and making findings of consistency with the General Plan and the eight priority policies of Planning Code Section 101.1.

NOTE: **Unchanged Code text and uncodified text** are in plain Arial font.
Additions to Codes are in single-underline italics Times New Roman font.
Deletions to Codes are in ~~strikethrough italics Times New Roman font~~.
Board amendment additions are in double-underlined Arial font.
Board amendment deletions are in ~~strikethrough Arial font~~.
Asterisks (* * * *) indicate the omission of unchanged Code subsections or parts of tables.

Be it ordained by the People of the City and County of San Francisco:

Section 1. Findings.

(a) Charter Section 4.105 and Planning Code Section 340 provide that the Planning Commission shall periodically recommend to the Board of Supervisors, for approval or rejection, proposed amendments to the San Francisco General Plan.

(b) Planning Code Section 340 provides that an amendment to the General Plan may be initiated by a resolution of intention by the Planning Commission, which refers to, and incorporates by reference, the proposed General Plan amendment. Section 340 further provides that the Planning Commission shall adopt the proposed General Plan amendment after a public hearing if it finds from the facts presented that the public necessity, convenience and general welfare require the proposed amendment or any part thereof. If adopted by the

Commission in whole or in part, the proposed amendment shall be presented to the Board of Supervisors, which may approve or reject the amendment by a majority vote.

(c) Pursuant to Planning Code Section 340, the Planning Commission initiated this amendment on _____, 2017, in Motion No. _____. Pursuant to Planning Code Section 340 and Charter Section 4.105, the Planning Commission adopted this amendment to the Western Shoreline Area Plan of the General Plan on _____, 2017 in Resolution No. _____, finding that this amendment serves the public necessity, convenience and general welfare, and is in conformity with the General Plan and the eight Priority Policies in Planning Code Section 101.1.

(d) The Planning Department has determined that the actions contemplated in this ordinance are exempt from the California Environmental Quality Act (Public Resources Code Sections 21000 et seq.) pursuant to Public Resources Code Section 21080.9. Said determination is on file with the Clerk of the Board of Supervisors in File No. _____ and is incorporated herein by reference. The Board affirms this determination.

(e) The _____, 2017 letter from the Planning Department transmitting the proposed amendments to the Western Shoreline Area Plan of the General Plan, and the resolutions adopted by the Planning Commission with respect to the approval of this General Plan amendment, are on file with the Clerk of the Board of Supervisors in File No. _____.

(f) The Board of Supervisors finds, pursuant to Planning Code Section 340, that this General Plan amendment, set forth in the documents on file with the Clerk of the Board in File No. _____, will serve the public necessity, convenience and general welfare for the reasons set forth in Planning Commission Resolution No. _____ and incorporates those reasons herein by reference.

(g) The Board of Supervisors finds that this General Plan amendment, as set forth in the documents on file with the Clerk of the Board in Board File No. _____, is in

1 conformity with the General Plan and the eight priority policies of Planning Code Section
2 101.1 for the reasons set forth in Planning Commission Resolution No. _____. The Board
3 of Supervisors also finds and certifies that this General Plan amendment is intended to be
4 carried out in a manner fully in conformity with the California Coastal Act, for the reasons set
5 forth in Planning Commission Resolution No. _____. The Board hereby adopts the findings
6 set forth in Planning Commission Resolution No. _____ and incorporates those findings
7 herein by reference.

8 (h) After this General Plan amendment is adopted, it will be submitted to the
9 California Coastal Commission for review and certification of consistency with the California
10 Coastal Act of 1976 (Public Resources Code 30000 et seq.) as a proposed amendment to
11 San Francisco's Local Coastal Program Land Use Plan. If the California Coastal Commission
12 approves the Local Coastal Program amendment as submitted, it will take effect immediately
13 upon certification. If the California Coastal Commission certifies the Local Coastal Program
14 amendment subject to modifications, final approval by the Planning Commission and the
15 Board of Supervisors shall be required prior to the amendment taking effect.

16
17 Section 2. The San Francisco General Plan is hereby amended by adding a new
18 Objective 12 to the Western Shoreline Area Plan, as follows:

19 **COASTAL HAZARDS**

20 **OBJECTIVE 12**

21 **PRESERVE, ENHANCE, AND RESTORE THE OCEAN BEACH SHORELINE WHILE**
22 **PROTECTING PUBLIC ACCESS, SCENIC QUALITY, NATURAL RESOURCES, CRITICAL**
23 **PUBLIC INFRASTRUCTURE, AND EXISTING DEVELOPMENT FROM COASTAL HAZARDS**

24 **Policy 12.1. Adopt Managed Retreat Adaptation Measures Between Sloat Boulevard and**
25 **Skyline Drive.**

1 Erosion of the bluff and beach south of Sloat Boulevard has resulted in damage to and loss of
2 beach parking and portions of the Great Highway, and threatens critical wastewater system
3 infrastructure. Sea level rise will likely exacerbate these hazards in the future. The City shall pursue
4 adaptation measures to preserve, enhance, and restore public access, scenic quality, and natural
5 resources along Ocean Beach south of Sloat Boulevard and to protect wastewater and stormwater
6 infrastructure from impacts due to shoreline erosion and sea level rise.

7 Implementation Measures:

8 (a) As the shoreline retreats due to erosion and sea level rise, incrementally remove
9 shoreline protection devices, rubble that has fallen onto the beach, roadway surfaces, and concrete
10 barriers south of Sloat Boulevard.

11 (b) Relocate public beach parking and public restrooms to areas that will not be affected by
12 shoreline erosion or sea level rise for the foreseeable future. The relocated facilities should not require
13 the construction of shoreline protection devices and should be relocated if they are threatened by
14 coastal hazards in the future.

15 (c) Close the Great Highway between Sloat and Skyline boulevards and reroute traffic to
16 Sloat and Skyline boulevards.

17 (d) Import sand to restore the beach and construct dunes. Stabilize dunes with vegetation,
18 beach grass straw punch, brushwood fencing, or other non-structural methods.

19 (e) Extend the coastal trail to Fort Funston and Lake Merced by constructing a multi-use
20 public access pathway along the shoreline from Sloat Boulevard to Skyline Boulevard.

21 (f) Permit shoreline protection devices if necessary to protect coastal water quality and
22 public health by preventing damage to wastewater and stormwater infrastructure due to shoreline
23 erosion only when less environmentally damaging alternatives are determined to be infeasible.

24 (g) Maintain service vehicle access necessary for the continued operation and maintenance
25 of existing wastewater and stormwater infrastructure systems.

1 **Policy 12.2. Develop and Implement Sea Level Rise Adaptation Plans for the Western**
2 **Shoreline.**

3 Sea level rise and erosion threaten San Francisco's coastal resources and their impacts will
4 worsen over time. San Francisco shall use the best available science to support the development of
5 adaptation measures to protect our coastal resources in response to sea level rise and coastal hazards.

6 Implementation Measures:

7 a) Conduct detailed sea level rise vulnerability assessments and develop adaptation plans to
8 minimize risks to life, property, essential public services, public access and recreation, and scenic and
9 natural resources from shoreline erosion, coastal flooding and sea level rise for the Western Shoreline
10 Area.

11 b) The vulnerability assessments shall be based on sea level rise projections for likely and
12 worst-case mid-century and end-of-century sea level rise in combination with a 100-year storm event,
13 and shall include one or more scenarios that do not rely on existing shoreline protection devices.

14 c) Adaptation measures shall be designed to minimize impacts on shoreline sand supply, scenic
15 and natural resources, public recreation, and coastal access.

16 d) The adaptation plans shall consider a range of alternatives, including protection, elevation,
17 flood proofing, relocation or partial relocation, and reconfiguration.

18 e) Adaptation measures that preserve, enhance, or restore the sandy beach, dunes, and natural
19 and scenic resources such as beach nourishment, dune restoration, and managed retreat shall be
20 preferred over new or expanded shoreline protection devices.

21 f) Create and maintain sea level rise hazard maps to designate areas within the coastal zone
22 that would be exposed to an increased risk of flooding due to sea level rise. The maps shall include
23 likely and worst case mid-century and end-of-century sea level rise projections in combination with a
24 100-year storm event. The maps shall include a scenario that does not include existing shoreline
25

1 protection devices. The maps shall be updated when new information warranting significant
2 adjustments to sea level rise projections becomes available.

3 **Policy 12.3. Develop and Implement a Beach Nourishment Program to Sustain Ocean**
4 **Beach.**

5 Shoreline erosion has substantially narrowed the sandy beach south of Sloat Boulevard. Sea
6 level rise will likely exacerbate the loss of sandy beach south of Sloat Boulevard and may extend this
7 effect to the north towards the Cliff House. The City shall pursue the development and implementation
8 of a long-term beach nourishment program to maintain a sandy beach along the western shoreline to
9 preserve Ocean Beach as a public recreational resource for future generations and to protect existing
10 public infrastructure and development from coastal hazards.

11 **Implementation Measure:**

12 Work with the U.S. Army Corps of Engineers to develop and implement a beach nourishment
13 program involving the placement of sand dredged from the San Francisco bar navigation channel
14 offshore of the Golden Gate onto Ocean Beach. Other sources of suitable sand for beach nourishment
15 may also be identified and permitted. Sand shall not be removed from stable dunes.

16 **Policy 12.4. Develop the Shoreline in a Responsible Manner.**

17 Sea level rise and erosion impacts will worsen over time and could put private and public
18 development in the Western Shoreline Area at risk of flooding. Given these future impacts, development
19 in the Coastal Zone should be sited to avoid coastal hazard areas when feasible. If avoidance is
20 infeasible, development shall be designed to minimize impacts to public safety and property from
21 current or future flooding and erosion without reliance on current or future shoreline protection
22 features.

23 New development and substantial improvements to existing development located in areas
24 exposed to an increased risk of flooding or erosion due to sea level rise shall be designed and
25 constructed to minimize risks to life and property.

1 New development and substantial improvements to existing development shall ensure stability
2 and structural integrity, and neither create nor contribute significantly to erosion, geologic instability,
3 or destruction of the site or surrounding area.

4 New development and substantial improvements to existing development shall not require the
5 construction of shoreline protective devices that would substantially alter natural landforms along
6 bluffs and cliffs.

7 Public recreational access facilities (e.g., public parks, restroom facilities, parking, bicycle
8 facilities, trails, and paths), public infrastructure (e.g., public roads, sidewalks, and public utilities),
9 and coastal-dependent development shall be sited and designed in such a way as to limit potential
10 impacts to coastal resources over their lifetime. As appropriate, such development may be allowed
11 within the immediate shoreline area only if it meets all of the following criteria:

12 1. The development shall be sited and designed to be easy to relocate and/or remove without
13 significant damage to shoreline and/or bluff areas.

14 2. The development shall only be allowed when it will not cause, expand, or accelerate
15 instability of a bluff.

16 **Policy 12.5. Limit Shoreline Protection Devices**

17 Shoreline protection devices such as rock revetments and seawalls can negatively impact
18 coastal resources by disrupting sand transport and fixing the shoreline in a specific location, leading to
19 the eventual narrowing and ultimate loss of sandy beaches. Such structures are expensive to construct
20 and maintain, may be incompatible with recreational uses and the scenic qualities of the shoreline, and
21 may physically displace or destroy environmentally sensitive habitat areas associated with bluffs,
22 dunes, beaches, and intertidal areas. Because of these impacts, Shoreline protection devices shall be
23 avoided and only implemented when less environmentally damaging alternatives are not feasible.

24 Shoreline protection devices such as rock revetments and seawalls shall be permitted only
25 where necessary to protect critical infrastructure and existing development from a substantial risk of

1 loss or major damage due to erosion and only where less environmentally damaging alternatives such
2 as beach nourishment, dune restoration and managed retreat are determined to be infeasible. New or
3 expanded shoreline protection devices should not be permitted solely to protect parking, restrooms, or
4 pedestrian or bicycle facilities.

5 **Policy 12.6. Requirements for Shoreline Protection Devices.**

6 Shoreline protection devices may be necessary to protect existing infrastructure or
7 development. These shoreline protection devices shall be designed to minimize their impacts on coastal
8 resources while providing adequate protection for critical infrastructure and existing development.

9 All shoreline protection devices shall be designed and constructed to avoid, minimize, and
10 mitigate impacts on shoreline sand supply, environmentally sensitive habitat areas, scenic quality,
11 public recreation, and coastal access.

12 Shoreline protection devices shall be designed to blend visually with the natural shoreline,
13 provide for public recreational access, and include proportional mitigation for unavoidable coastal
14 resource and environmentally sensitive habitat impacts.

15 Coastal permit applications for reconstruction, expansion, or replacement of existing shoreline
16 protection devices shall include a re-assessment of the need for the device, the need for any repair or
17 maintenance of the device, any additional required mitigation for unavoidable impacts to coastal
18 resources and the potential for removal or relocation based on changed conditions. Coastal permits
19 issued for shoreline protective devices shall authorize their use only for the life of the structure they
20 protect.

21
22 Section 3. Effective Date. After this General Plan amendment is adopted, it will be
23 submitted to the California Coastal Commission for review and certification of consistency with
24 the California Coastal Act of 1976 (Public Resources Code 30000 et seq.) as a proposed
25 amendment to San Francisco's Local Coastal Program Land Use Plan. If the California

1 Coastal Commission approves the Local Coastal Program amendment as submitted, it will
2 take effect immediately upon certification. If the California Coastal Commission certifies the
3 Local Coastal Program amendment subject to modifications, final approval by the Planning
4 Commission and the Board of Supervisors shall be required prior to the amendment taking
5 effect.

6
7 APPROVED AS TO FORM:
8 DENNIS J. HERRERA, City Attorney

9 By:


10 ANDREA RUIZ-ESQUIDE
11 Deputy City Attorney

12 n:\land\as2017\1400566\01194422.docx

FILE NO.

LEGISLATIVE DIGEST

[General Plan - Western Shoreline Area Plan (Local Coastal Plan) Amendment]

Ordinance amending the Western Shoreline Area Plan of the San Francisco General Plan, San Francisco's Local Coastal Program Land Use Plan, to add an objective to preserve, enhance, and restore the Ocean Beach shoreline while protecting public access, scenic quality, natural resources, critical public infrastructure, and existing development from coastal hazards; affirming the Planning Department's determination under the California Environmental Quality Act; and making findings of consistency with the General Plan and the eight priority policies of Planning Code Section 101.1.

Existing Law

State law requires cities and counties to prepare and adopt a "comprehensive, long-term" General Plan for the development of the city or county. This comprehensive General Plan, once adopted, has been recognized by the courts as the "constitution" for land development in the areas covered. There are seven mandatory General Plan elements, which must be included in every plan: land use, circulation, housing, conservation, open space, noise and safety. There is also authority in the law to add additional optional elements if a local jurisdiction so wishes, along with express authority that the General Plan may "address any other subjects which, in the judgment of the legislative body, relate to the physical development of the county or city." General plans may be adopted in any format deemed appropriate or convenient by the local legislative body, including combining the elements.

San Francisco's General Plan contains the following elements: Land Use Index, Housing, Commerce And Industry, Recreation And Open Space, Transportation, Urban Design, Environmental Protection, Community Facilities, Community Safety, Arts and Air Quality. In addition, it contains several area plans, such as the Downtown, Glen Park, Hunters Point Shipyard, Market and Octavia, Mission, and Western Shoreline Area Plans. These elements and plans are amended from time to time to reflect changed circumstances.

The Western Shoreline Area Plan is both an area plan of the City's General Plan and the land use plan portion of San Francisco's Local Coastal Program under the California Coastal Act of 1976 (Public Resources Code Section 30000 et seq., "the Coastal Act"). The Local Coastal Program addresses coastal access, public recreation, transportation, land use, and habitat protection within the San Francisco Coastal Zone, but does not address coastal hazards or sea level rise.

FILE NO.

Amendments to Current Law

This Ordinance seeks to amend the General Plan's Western Shoreline Area Plan to add policies which address coastal hazards including erosion, coastal flooding, and sea level rise. Specifically, the Ordinance adds a new Objective 12 to the Western Shoreline Area Plan. This Objective calls for the preservation, enhancement, and restoration of the Ocean Beach shoreline, while protecting public access, scenic quality, natural resources, critical public infrastructure, and existing development from coastal hazards. It includes six distinct policies:

- Policy 12.1. Adopt Managed Retreat Adaptation Measures Between Sloat Boulevard and Skyline Drive;
- Policy 12.2. Develop and Implement Sea Level Rise Adaptation Plans for the Western Shoreline;
- Policy 12.3. Develop and Implement a Beach Nourishment Program to Sustain Ocean Beach;
- Policy 12.4. Develop the Shoreline in a Responsible Manner;
- Policy 12.5. Limit Shoreline Protection Devices; and
- Policy 12.6. Requirements for Shoreline Protection Devices.

The Ordinance explains that after this General Plan amendment is adopted, it will be submitted to the California Coastal Commission for review and certification of consistency with the Coastal Act as a proposed amendment to San Francisco's Local Coastal Program Land Use Plan. If the California Coastal Commission approves the Local Coastal Program amendment as submitted, it will take effect immediately upon certification. If the California Coastal Commission certifies the Local Coastal Program amendment subject to modifications, final approval by the Planning Commission and the Board of Supervisors shall be required prior to the amendment taking effect.

Background Information

Pursuant to the Coastal Act, all development within the state's Coastal Zone must conform to the public access and coastal resource protection policies of the Coastal Act. These requirements are implemented by the California Coastal Commission in partnership with the state's coastal cities and counties through local coastal programs.

San Francisco prepared its local coastal program (LCP), comprised of the Western Shoreline Area Plan and implementing policies of the Planning Code, in the early 1980s, and the City's LCP was certified by the California Coastal Commission as meeting the requirements of the Coastal Act on March 14, 1986. The City exercises coastal development permitting authority under the certified LCP, and the policies of the LCP form the legal standard of review for both public (state and local) and private projects under this authority.

FILE NO.

The Coastal Commission retains coastal development permitting jurisdiction over projects located on tidelands, submerged lands, and public trust lands, and for any state, local, or private projects on federal lands. In addition, the federal Coastal Zone Management Act grants federal consistency review authority to the Coastal Commission for all projects affecting the Coastal Zone that are either undertaken by the federal government or that require a federal license, permit, or approval. The Chapter 3 policies of the Coastal Act – not the City's LCP – serve as the standard of review for the Coastal Commission's coastal development permitting and federal consistency review authorities.

All projects approved or undertaken by the City, regardless of location, are reviewed for consistency with the General Plan. Thus, the policies of the Western Shoreline Plan apply to both actions that are subject to the City's coastal permit authority and to the City's General Plan.

The San Francisco Coastal Zone extends approximately 6 miles along the western shoreline from the Fort Funston cliff area in the south to the Point Lobos recreational area in the north. The south end of the Coastal Zone includes the Lake Merced area, the Zoo, the Olympic Club, and the seashore and bluff area of Fort Funston. The Coastal Zone spans the Ocean Beach shoreline and includes Golden Gate Park west of Fortieth Avenue, the Great Highway corridor and the adjacent residential blocks in the Sunset and Richmond districts. The north end of the seashore includes the Cliff House and Sutro Baths area, Sutro Heights Park, and Point Lobos recreational area.

These amendments to the Western Shoreline Area Plan are the culmination of more than a decade of work undertaken by the City to explore options to address erosion and coastal access at Ocean Beach. In these efforts, the City has worked in close cooperation, and with the involvement of, a host of federal, state, and local agencies, as well as community stakeholders and non-profit organizations.

n:\land\as2017\1400566\01194782.docx



SAN FRANCISCO PLANNING DEPARTMENT

To: San Francisco Planning Commission
From: Maggie Wenger, San Francisco Planning Department
Subject: Erratum for the Western Shoreline Area Plan/Local Coastal Program Amendment, Policy 12.6
Date: June 1, 2017
CC: Community Advisory Group, City Attorney's Office, Land Use Division

1650 Mission St.
Suite 400
San Francisco,
CA 94103-2479

Reception:
415.558.6378

Fax:
415.558.6409

Attached is an erratum to the proposed Western Shoreline Area Plan/Local Coastal Program Amendment. The purpose of the erratum is to correct the 12.6 policy language for General Plan consistency. The amendment is scheduled for adoption at a hearing before the Planning Commission on June 8, 2017. The erratum, shown below, is reflected in bold strikethrough for deleted text and bold double underline for new text; it is presented in the format as it would appear in the resolution. Staff advises that the information provided in the erratum is minor and does not constitute significant new information requiring recirculation of the draft amendment prior to adoption.

Planning
Information:
415.558.6377

ERRATUM

1. Policy 12.6. ~~Requirements for Shoreline Protection Devices~~ Minimize Impacts of Shoreline Protection Devices. The revision to the amendment has been made in the electronic document available on the Planning Department website at: <http://sf-planning.org/meetings/17>.