



March 28<sup>th</sup>, 2017

To: SF Supervisors and Planning Department

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

Dear Supervisors and Planning Commissioners,

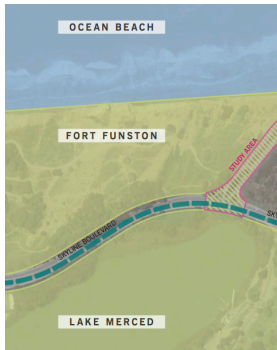
**1. One Lane each way, with multi-use trail on Outer Great Hwy is preferred:**

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

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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



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

## **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, 10<sup>th</sup> Floor  
San Francisco, CA 94103

T 415.431.BIKE  
F 415.431.2468

[sfbike.org](http://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". The signature is fluid and cursive, with a large loop at the end.

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](mailto: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 / การช่วยเหลือทางด้านภาษาโดยไม่เสียค่าใช้จ่าย / 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.<sup>1</sup> 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<sup>2</sup>". 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

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<sup>1</sup> 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.

<sup>2</sup> 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.<sup>3</sup> 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.

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<sup>3</sup>Both 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 black ink, appearing to read "Bill McLaughlin".

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

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*Office of Commission Affairs*

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1650 Mission Street, Suite 400, San Francisco, CA 94103  
Direct: 415-558-6309 | Fax: 415-558-6409

[commissions.secretary@sfgov.org](mailto:commissions.secretary@sfgov.org)  
[www.sfplanning.org](http://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

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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](mailto:chris.kern@sfgov.org)  
**Web:** [www.sfplanning.org](http://www.sfplanning.org)

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**From:** Aaron Goodman [mailto:[amgodman@yahoo.com](mailto:amgodman@yahoo.com)]  
**Sent:** Wednesday, April 05, 2017 10:33 PM  
**To:** [bgrant@spur.org](mailto: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

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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

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**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  
[REDACTED]



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](mailto: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.

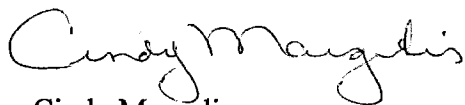
The wildlife we are concerned with are the wintering shorebirds that inhabit the beach from October through March; spring migrants that occur, sometimes in huge numbers, from March through April; fall migrants that stop along the beach between July and October; and birds that utilize the beach during 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 principles <sup>1</sup>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](mailto:chris.kern@sfgov.org)  
Mr. Dan Murphy [murphsf@comcast.net](mailto:murphsf@comcast.net)

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<sup>1</sup> 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 2<sup>nd</sup> Initiation Hearing

### SCOPE OF THE AMENDMENT

COMMENTER	PUBLIC COMMENT	CITY RESPONSE
<p>Sierra Club San Francisco Bay-2</p>	<p>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.</p>	<p>The scope of this amendment is limited to coastal hazards. Existing LCP policies address habitat and coastal resource protection.</p>
<p>Golden Gate Audobon Society-1</p>	<p>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.</p>	<p>The scope of this amendment is limited to coastal hazards. Existing LCP policies address habitat and coastal resource protection.</p>
<p>Bill McLaughlin Surfrider Foundation San Francisco Chapter-1</p>	<p>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</p>	<p>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.</p>

	<p>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.</p>	
<p>Goodman-1</p>	<p>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.</p>	<p>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.</p>
<p>Goodman-2</p>	<p>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.</p>	<p>The scope of this amendment is limited to coastal hazards. Existing LCP policies address habitat and coastal resource protection.</p>
<p>Goodman-3</p>	<p>We often go to the beach from the</p>	<p>The scope of this amendment is limited to</p>

	<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>
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**EXISTING CONDITIONS**

	PUBLIC COMMENT	CITY RESPONSE
<p>Veit-1</p>	<p>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.</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>
<p>Veit-3</p>	<p>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</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 &amp; Rec) includes many users &amp; 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>The <i>Coastal Protection Measures &amp; 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><a href="http://www.californiacoastline.org/cgi-bin/image.cgi?image=201007749&amp;mode=big">http://www.californiacoastline.org/cgi-bin/image.cgi?image=201007749&amp;mode=big</a>.</p>



		<p>Regardless, the presence or absence of Colma formation at Noriega has negligible influence on the proposed actions along this stretch of beach.</p>
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**EROSION CONTROL AND MANAGED RETREAT**

	PUBLIC COMMENT	CITY RESPONSE
<p>Veit-2</p>	<p>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.</p>	<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).</p>
<p>Sierra Club                      San Francisco                      Bay-2</p>	<p>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</p>	<p>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.</p>

	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. <b>The amendment calls for removal of existing debris, rubble, armoring, and artificial fill from the shoreline south of</b>

	<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 20<sup>th</sup> century (Battalio and Trivedi 1996; Olmsted and Olmsted 1979; McLaughlin 20105; <a href="http://ww2.kqed.org/quest/wp-content/uploads/sites/39/2013/02/map.jpg">http://ww2.kqed.org/quest/wp-content/uploads/sites/39/2013/02/map.jpg</a>). 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>

	<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.</p>	<p>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).</p>
Holl-6	<p>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.</p>	<p>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.</p>
Holl-7	<p>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.</p>	<p>See response to comment Holl-6 regarding the effectiveness of managed retreat strategies and proposed beach nourishment to maintain a sandy beach.</p> <p>See response to comment Holl-5 regarding coastal protection and erosion risk at the Oceanside Treatment Plant.</p>
Holl-8	<p>These amendments are a radical change from the existing LCP which calls for armoring the whole shoreline.</p>	<p>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>

		<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>
<p>Surfrider-1</p>	<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.