

The City of Pacifica is updating its Local Coastal Plan and Land Use Plan to prepare for sea level rise and coastal hazards related to climate change. In 2018, the City assessed its vulnerabilities and possible solutions in response to state sea level rise guidance and emerging science.

This 'Sea Level Rise Vulnerability Assessment' showed that Pacifica's spectacular coast is in jeopardy. An alarming 57 acres of beach, 78 acres of wetlands and several miles of coastal trail in Pacifica may be lost by mid to late century due to rising seas and erosion. Without proactive and thoughtful planning, Pacifica is on track to lose resources like beaches, sensitive habitats, and trails that make this City special for residents and visitors.

Surfrider strongly supports scaling back armoring along Pacifica's coastline as a way to protect the coastline. In an economic analysis that looked at various possible strategies the City could take to manage sea level rise, the City found that removing existing armoring, purchasing and clearing property (\*of volunteering property owners) and realigning infrastructure where practical (managed retreat) provides a net economic benefit on the order of tens of millions of dollars in some places — over time.

This is no surprise because maintaining infrastructure inundated by sea level rise is going to grow increasingly expensive, whereas preserving recreational space will drive the local economy and contribute to better quality of life for the vast majority of residents and visitors to the community. Managed retreat however, is actively avoided and even outright prohibited in the City's draft LCPLUP (sea level rise planning document) because of political concerns and the fear over the loss of private property.

Surfrider Foundation supports the following in Pacifica:

## Acknowledge where managed retreat is possible

Managed retreat may be possible in some portions of the city with volunteering property owners or where public infrastructure can be relocated; and this strategy could help mitigate loss of our beaches and waves over the coming decades. Voluntary programs do not threaten civil liberties and may provide a pathway to preserving and restoring coastal resources. The City's current plan to prohibit managed retreat as an adaptation strategy unnecessarily eliminates important opportunities for coastal resource protection.

#### Avoid over-reliance on seawalls

Seawalls kill beaches. They disrupt sediment dynamics and make erosion worse. By fixing the back of the beach as seas rise, the beach cannot migrate landward. Seawalls can create backwash in the surf, set permanent high tide conditions and destroy waves. One third of the City's six miles of coast is already armored - we must avoid expansion if we want beaches to exist in Pacifica over the next generation.

# Special Resiliency Areas are unlawful

We do not support the City's proposed "Special Resiliency Areas." This concept ignores a fundamental policy of the California Coastal Act; that new development (built after 1976) is not entitled to armoring. By contradicting state law with a proposed allowance for special exception areas, the City will undermine the state's bedrock coastal protection law and perpetuate development in hazardous areas. The result in Pacifica will be to sacrifice our public beaches and waves to coastal squeeze. The City's proposed "coastal amenity improvements" as mitigation for the Special Resiliency Areas are wholly inadequate - we must not sacrifice the existence of our beaches for things like restrooms and signage.

## Pacifica's "Existing development" definition must be corrected

The City's current proposed definition of 'existing development' contradicts the Coastal Act. The access and resource protection policies of Chapter 3 of the California Coastal Act mandate protection of public access and recreation along the coast, coastal habitats, and other sensitive resources, as well as seek to minimize risks from coastal hazards. The act also makes clear that development built before 1977 is entitled to shoreline armoring, while new development must be sited out of harm's way where it does not have to rely on seawalls. Section 30235 states that "new development shall...neither create nor contribute to erosion...or in any way require the construction of protective devices that would substantially alter natural landforms along bluffs and cliffs."

### What's next?

The City's current sea level rise planning document will result in dramatically more armoring in Pacifica. This means more walls for select assets, and less beaches and waves for the rest of us. We must encourage the City to protect the resources we all enjoy! For more information and to get involved, contact: policy@smc.surfrider.org.