

# Local Coastal Land Use Plan Certification Study Session

November 13, 2023



# Agenda

- **Recap purpose ongoing work**
- **Outline objectives for tonight**
- **Key Issues**
- **Detailed review of key CCC suggested modifications**

# Recap

- Not a reconsideration of the structure and policy emphasis that was previously approved
- Intended to conclude the comprehensive LCLUP update process
- Three meetings intended to determine if the City will recommend alternative revisions to the Revised Certification Draft LCLUP
- Meeting #2 – Scheduled for December 5, 2023 – provide direction on alternative modifications
- Meeting #3 – Tentatively scheduled for mid-late January 2024 – City Council consideration and approval of a comment letter for CCC

# Tonight's Purpose

Receive an informational presentation and respond to City Council questions regarding the California Coastal Commission staff's March 8, 2023 suggested modifications

# CCC Suggested Modification

## Staff's assessment

- Many suggested modifications are minor and do not alter policy position
- Small number of revisions do alter the City's vision of the Coastal zone and warrant consideration by City Council

# Suggested Modifications Overview

## Chapter 2 – Land Use and Development

- Total revisions: 15
- Minor modifications:
  - New text: 1
  - Typo Correction: 2
  - Coastal Act Provision: 1
  - Clarification: 1
  - Other amendment: 8
- For future discussion: 2

## Chapter 3 – Public Access and Recreation

- Total revisions: 9
- Minor modifications:
  - New text: 1
  - Clarification: 2
  - Other amendment: 6
- For future discussion: None

# Suggested Modifications Overview (continued)

## Chapter 4 – Environmental and Scenic Resources

- Total revisions: 23
- Minor modifications:
  - New text: 1
  - Typo Correction: 1
  - Clarification: 10
  - Generalizes language: 5
  - Deletes text: 1
  - Other amendment: 1
- For future discussion: 4

## Chapter 5 – Natural Hazards

- Total revisions: 15
- Minor modifications:
  - Clarification: 5
  - Deletes text: 2
  - Other amendment: 6
- For future discussion: 2

# Suggested Modifications Overview (continued)

## Chapter 6 – Coastal Resilience

- Total revisions: 61
- Minor modifications:
  - Clarification: 2
  - Generalizes language: 9
  - Deletes text: 1
  - Other amendment: 10
  - Coastal Act provision: 5
  - Reorganization: 16
- For future discussion: 18

## Glossary

- Total revisions: 10
- Minor modifications:
  - New text: 1
  - Clarification: 2
  - Deletes text: 1
  - Other amendment: 2
  - Coastal Act provision: 1
- For future discussion: 3



# Key Issues



## Theme: Direct City Impacts

Chapter	Agenda Packet Page #	Modification Number	Policy Number and/or Subject Addressed	City's Certification Draft	CCC Suggested Modification	Brief Summary
2	50 & 264	2.6	LD-I-14: Promenade Area and Beach Boulevard Property	Enhance the Promenade area as a local community and tourist destination.	Enhance the Promenade area as a local community and tourist destination, while also ensuring that it adequately responds to and addresses coastal hazard considerations consistent with the LCP.	<ul style="list-style-type: none"> <li>• Could impact development on the site</li> <li>• Does not differentiate small or non-permanent improvements</li> </ul>
2	59 & 267	2.12	LD-I-37: Public Services for New Developments	N/A	Public Services for New Development. Development shall only be approved if it can be shown that it can be accommodated by adequate and sustainable public services (including in terms of water, sewer, and circulation) without any significant impacts to coastal resources. Public service development shall be limited to levels that are sufficient to accommodate LCP consistent development, including at buildout, and shall not be allowed if it would be growth inducing past that threshold.	<ul style="list-style-type: none"> <li>• New policy applicable to new development.</li> <li>• Existing infrastructure in the Coastal Zone supports growth city-wide.</li> <li>• Unclear what “growth inducing” means</li> </ul>
6	178 & 289	6.7	CR-I-3: Monitoring Shoreline Change	The monitoring program shall include yearly (minimum) shoreline and bluff edge surveys and also establish thresholds for reassessing the City's Adaptation Plan.	The monitoring program shall include biannual (minimum following winter and summer) shoreline and bluff edge surveys and also establish thresholds for reassessing the City's Adaptation Plan.	<ul style="list-style-type: none"> <li>• Amends policy to require additional monitoring.</li> <li>• May be too burdensome on City resources.</li> </ul>

# Theme: Environmental Considerations

Chapter	Agenda Page #	Modification Number	Policy Number and/or Subject Addressed	City's Certification Draft	CCC Suggested Modification	Brief Summary
4	111 & 272	4.3	ER-I-1: Creek Protection and Restoration.	Requiring a minimum of 100 feet setbacks from the top of creek banks, or from the outer edge of riparian vegetation, where it exists, for development proposed adjacent to creeks, in keeping with City regulations and Best Management Practices. Exceptions to such buffer requirements should be supported by a biological report demonstrating that the adjusted buffer, in combination with incorporated siting, design or other mitigation measures, shall prevent impacts that significantly degrade the creek. Buffer adjustments should also be limited to where the entire subject legal lot is within the buffer or where it is demonstrated that development outside the buffer would have a greater impact on the creek.	Requiring a minimum of 100 feet setbacks from the top of creek banks, or from the outer edge of riparian vegetation, where it exists, whichever is further, for development proposed adjacent to creeks, in keeping with City regulations and Best Management Practices. The 100-foot buffer may be reduced by the minimum necessary (1) to avoid a taking (for private development), or (2) to provide required public services (for public development), provided that the buffer is as close to 100 feet as possible, and no less than 50 feet in any case, and provided that creek resource impacts are avoided as much as possible, and unavoidable impacts commensurately mitigated, all as conclusively demonstrated by a qualified biologist to the satisfaction of the City, USFWS, and CDFW.	<ul style="list-style-type: none"> <li>Formalizes buffer exceptions</li> <li>Reduces developable area</li> </ul>
4	112 & 273	4.3	ER-I-1: Creek Protection and Restoration.	N/A	Permitted uses within buffer zones are limited to uses dependent on the resources within these areas and their buffer zones (i.e. habitat management and restoration, scientific research and educational activities, and low-intensity public access and recreation). Temporary disruption (e.g. less than six months) for the construction, alteration, repair, and maintenance of existing or newly permitted facilities or structures is allowed if there are no feasible alternatives, the disruption area is restored to its pre-disruption state or better within one year from the initial point of impact and there is no significant ground disturbance.	<ul style="list-style-type: none"> <li>New policy text</li> <li>Limits the activities within buffer zones</li> <li>Clarifies temporary description allowances</li> </ul>

## Theme: Environmental Considerations continued

Chapter	Page #	Modification Number	Policy Number and/or Subject Addressed	City's Certification Draft	CCC Suggested Modification	Brief Summary
4	120 & 275	4.7	N/A	N/A	Dune habitat includes areas with sandy substrates proximate to the marine environment and may range from bare to vegetated with species typical of foredune and dune scrub communities, including non-natives such as ice plant and invasive grasses. Dune form topography may or may not be evident, depending on the condition of the dune and past land use or invasions, but may be readily restored. While most dunes occur near sea level, there are several examples of perched dune systems atop bluffs in Pacifica, where aeolian forces have created the substrate and processes appropriate to support dune vegetation. All areas that meet this definition of Dunes are categorically considered ESHA.	<ul style="list-style-type: none"> <li>• New habitat category</li> <li>• Reduces developable area</li> <li>• Applicability of additional ESHA policies to properties</li> </ul>
4	128 & 279	4.13	ER-I-24: Management of ESHA	<ul style="list-style-type: none"> <li>• Buffer areas shall be established around all sensitive resources, providing a minimum of 100 feet, and varying as needed to account for feeding, breeding, nesting, and other habitat requirements. Exceptions to such buffer requirements should be supported by a biological report demonstrating that the adjusted buffer, in combination with incorporated siting, design or other mitigation measures, will prevent impacts that significantly degrade the ESHA and will be compatible with the continuance of the ESHA. Buffer adjustments should also be limited to where the entire subject legal lot is within the buffer or where it is demonstrated that development outside the buffer would have a greater impact on the ESHA.</li> </ul>	<ul style="list-style-type: none"> <li>• Buffer areas shall be established around all ESHA, providing a minimum of 100 feet, and may be expanded as needed to account for feeding, breeding, nesting, and other habitat requirements. The 100-foot buffer may be reduced by the minimum necessary (1) to avoid a taking (for private development), or (2) to provide required public services (for public development), provided that the buffer is as close to 100 feet as possible, and no less than 50 feet in any case, and provided that ESHA resource impacts are avoided as much as possible, and unavoidable impacts commensurately mitigated, all as conclusively demonstrated by a qualified biologist to the satisfaction of the City, USFWS, and CDFW.</li> </ul>	<ul style="list-style-type: none"> <li>• Clarification to comply with Coastal Act provision.</li> <li>• Formalizes buffer exceptions</li> <li>• Reduces developable area</li> </ul>

## Theme: Environmental Considerations continued

Chapter	Page #	Modification Number	Policy Number and/or Subject Addressed	City's Certification Draft	CCC Suggested Modification	Brief Summary
6	193 & 304	6.42	CR-I-51: Habitat Sea Level Rise Migration Buffers.	A sea level rise buffer area shall be added to require new development habitat buffers if necessary to allow for the migration of wetlands and other coastal habitats caused by sea level rise over the anticipated duration (i.e., economic life) of the development. Habitats include all wetlands, riparian, intertidal/shoreline and terrestrial environmentally sensitive habitat areas (ESHAs) as defined by the Coastal Act. The sea level rise projection considered shall be determined for the type of development from CalNRA and OPC (2018) guidance or the latest update.	An additional sea level rise buffer area shall be added to required habitat buffers if necessary to allow for the migration of wetlands and other coastal habitats caused by sea level rise over the anticipated life of the development. Habitats include all wetlands, riparian, intertidal/shoreline and terrestrial environmentally sensitive habitat areas (ESHAs) as defined by the Coastal Act. The sea level rise projection considered shall be determined based on the type of development and current State guidance.	<ul style="list-style-type: none"> <li>• Additional buffer</li> <li>• Reduces developable area</li> <li>• Clarification to require compliance with State guidance.</li> </ul>
5	151 & 282	5.4	NH-I-9: Erosion Prevention	Require erosion prevention of hillside areas by revegetation or other acceptable methods.	Deleted	<ul style="list-style-type: none"> <li>• Deletes entire policy related to preventive measures</li> </ul>
5	148	5.10	NH-I- 26: Flood Control Maintenance	Regularly maintain flood control structures, including, but not limited to drainage channels, pipes, culverts, and stream beds.	Regularly maintain flood control structures, including, but not limited to drainage channels, pipes, and culverts.	<ul style="list-style-type: none"> <li>• Deletes text</li> <li>• Significant areas in Pacifica are serviced by creeks as critical stormwater infrastructure.</li> </ul>

## Theme: Preparation of Policies

Chapter	Page #	Modification Number	Policy Number and/or Subject Addressed	City's Certification Draft	CCC Suggested Modification	Brief Summary
6	173 & 286	6.3	Vulnerability Assessment - Pacific Institute Study	However, because the Coastal Vulnerability Zone Maps show significant erosion for areas that are protected by existing shoreline protection structures, the Maps highlight the importance of the existing structures and the vital need for them to be maintained to protect those vulnerable areas.	Deleted	Deletes text related to the City's perspective on the Vulnerability Assessment.
6	174 & 286	6.4	Adaptation Plan	The cost-benefit analysis section of the Adaptation Plan was not adopted or approved by the City of Pacifica. The purpose of the cost benefit analysis was to provide information regarding various sea level rise scenarios and adaptation options and was not intended to prescribe specific adaptation policies. The cost-benefit analysis shall not be used for any future purpose by the City of Pacifica or its planning processes, including implementation of the Local Coastal Program, public infrastructure investment, permitting or other regulatory purposes.	Deleted	Deletes a factual statement about the cost-benefit analysis not being adopted by the City.
6	176 & 287	6.4	Adaptation Plan	Therefore, changes to the cost-benefit analysis in a manner to discourage managed retreat as suggested by some public commenters detailed below would be unnecessary since the Coastal Resilience policies do not include managed retreat as an adaptation strategy. As noted earlier in this section, the cost-benefit analysis prepared for the Adaptation Plan shall not be used for any future purpose by the City of Pacifica or its planning processes.	Deleted	Deletes a factual statement about the cost-benefit analysis.
6	176 & 287	6.4	Adaptation Plan	The Adaptation Plan was prepared to inform City decision making about a variety of sea level rise adaptation policies, but does not include or dictate the ultimate policies selected by the City. Although managed retreat alternatives are analyzed in the Adaptation Plan in accordance with the City's grant agreement with the CCC, these analyses do not, in themselves, equate to a managed retreat policy. To the contrary, the City has rejected managed retreat as a sea level rise adaptation policy in this LCP and managed retreat could only become the policy of the City subsequent to a future amendment to the LCP.	Deleted	Deletes a factual statement about the City's consideration of managed retreat.

## Theme: Preparation of Policies

Chapter	Page #	Modification Number	Policy Number and/or Subject Addressed	City's Certification Draft	CCC Suggested Modification	Brief Summary
6	182 & 293	6.13	Sub-area Policies and Programs	The City's overall approach for new development is to minimize or avoid current and projected future coastal hazards through siting and design. At the same time, managed retreat is not included in any of the near-term policies. Managed retreat would be reconsidered if feasibility and monitoring warranted, as detailed in Coastal Resilience Policies CR-I-3 and CR-I-4.	The City's overall approach to address coastal hazards is through siting and design of new development to be out of harm's way and to limit shoreline armoring as much as possible, including to help preserve and protect the City's shoreline and beaches.	<ul style="list-style-type: none"> <li>Amends text related to managed retreat.</li> <li>No policy value</li> </ul>

# Theme: Coastal Resiliency

Chapter	Page #	Modification Number	Policy Number and/or Subject Addressed	City's Certification Draft	CCC Suggested Modification	Brief Summary
6	166 & 285	6.1	Coastal Resilience	The purpose of this chapter is to provide policies which protect existing development from the hazard of sea level rise and which guide the design of new development to respond to sea level rise during the economic life of the project. Topics covered in this element include sea level rise projections, transfer of development rights (TDR), repair and replacement of existing shoreline protection structures (e.g., sea walls), and establishment of appropriate site design measures for new development. Protection of property rights is an important theme in this chapter.	The purpose of this chapter is to provide policies which protect existing development from the hazard of sea level rise and which guide the design of new development to respond to sea level rise during the anticipated life of the project. Topics covered in this element include sea level rise projections, transfer of development rights (TDR), repair and replacement of existing shoreline protection structures (e.g., sea walls), and establishment of appropriate site design measures for new development.	<ul style="list-style-type: none"> <li>Amends text to align with new definition of anticipated life</li> <li>Deletes an important theme about "protection of property rights."</li> </ul>
6	194 & 304	6.43	CR-I-55: Beach Nourishment	In coordination with the California Coastal Commission and other permitting agencies (e.g., State Lands Commission, U.S. Army Corps of Engineers), the City shall evaluate a beach nourishment program in conjunction with sand retention structures to assist in maintaining beach width and elevations, consistent with sub-area policies. The beach nourishment program will include measures to protect water quality and to avoid (and where unavoidable to minimize and mitigate) potential adverse coastal resource impacts, including biological resource impacts, from deposition of material, including measures such as sand compatibility specifications, restrictions on volume of deposition, timing or seasonal restrictions, and identification of environmentally preferred locations for deposits.	In coordination with the California Coastal Commission and other permitting agencies (e.g., State Lands Commission, U.S. Army Corps of Engineers), the City shall evaluate a beach nourishment program in conjunction with sand retention structures to assist in maintaining beach width and elevations, consistent with sub-area policies and the Coastal Act. The beach nourishment program will need to be evaluated to be the least environmentally damaging feasible alternative and will include measures to protect water quality and to avoid (and where unavoidable to minimize and mitigate) potential adverse coastal resource impacts, including biological resource impacts, from deposition of material, including measures such as sand compatibility specifications, restrictions on volume of deposition, timing or seasonal restrictions, and identification of environmentally preferred locations for deposits.	<ul style="list-style-type: none"> <li>Clarification that Coastal Act compliance is required.</li> <li>Including that it be the least environmentally damaging feasible alternative</li> <li>May not be an option</li> </ul>



## Theme: Coastal Resiliency – Shoreline Protection Structures

Chapter	Page #	Modification Number	Policy Number and/or Subject Addressed	City's Certification Draft	CCC Suggested Modification	Brief Summary
6	195 & 307	6.45	CR-I-57: New Shoreline Protection Structures	Shoreline protection structures, including revetments, breakwaters, groins, seawalls, cliff retaining walls, deep piers and caissons, and other such construction that alters natural shoreline processes shall only be permitted consistent Section 30235 of the Coastal Act and with the LCP's sub-area policies only when required to serve coastal-dependent uses or protect existing structures or public beaches in danger from erosion, when designed to eliminate or mitigate adverse impacts on local shoreline sand supply.	Shoreline protection structures, including revetments, breakwaters, groins, seawalls, cliff retaining walls, deep piers and caissons, and other such construction that alters natural shoreline processes shall only be permitted if consistent Section 30235 of the Coastal Act and with the LCP's sub-area policies, and only when required to serve coastal-dependent uses or protect existing structures or public beaches in danger from erosion, when there is no less environmentally damaging feasible alternative and when designed to avoid, and where unavoidable, minimize to the maximum extent feasible adverse impacts on local shoreline sand supply and other coastal resources, where unavoidable coastal resource impacts are required to be commensurately mitigated.	<ul style="list-style-type: none"> <li>• Still allows new shoreline protection structures</li> <li>• Amends policy to address unavoidable feasible alternative or coastal impacts.</li> <li>• Add additional triggers that may require mitigation</li> </ul>

## Theme: Coastal Resiliency – Shoreline Protection Structures continued

Chapter	Page #	Modification Number	Policy Number and/or Subject Addressed	City's Certification Draft	CCC Suggested Modification	Brief Summary
6	195 & 305	6.44	CR-I-56: Existing Shoreline Protection Structures	Except as may be otherwise provided in the LCP sub-area policies, legally permitted shoreline protection structures may be repaired and maintained, as supported by Section 30235 of the Coastal Act, subject to all coastal development permit requirements (including those associated with the construction of the structure and/or prior repair and maintenance episodes) until the development they are protecting is removed or no longer requires shoreline protection structures, at which time the shoreline protection structure shall be reevaluated for consistency with the LCP, and removed if no longer necessary. Activities considered “repair and maintenance” shall not result in any enlargement or extension of the shoreline protection structure, or any seaward encroachment or impairment of public trust resources, and shall provide mitigation for any new coastal resource impacts not previously or otherwise mitigated, including through the City’s Shoreline Mitigation Program (CR-I-5) and/or Policy CR-I-59.	Except as may be otherwise provided in the LCP sub-area policies, legally permitted shoreline protection structures may be repaired and maintained, as supported by Section 30235 of the Coastal Act, subject to all coastal development permit requirements (including those associated with the construction of the structure and/or prior repair and maintenance episodes) until the development they are protecting is removed or no longer requires shoreline protection structures, at which time the shoreline protection structure shall be reevaluated for consistency with the LCP removed if no longer necessary and/or allowed, and the area restored. Activities considered “repair and maintenance” shall not result in any enlargement or modification to the shoreline protection structure, or any replacement of materials in excess of 50%, or any seaward encroachment or impairment of public trust resources, and shall provide mitigation for any new coastal resource impacts not previously or otherwise mitigated, including through the City’s Shoreline Mitigation Program (CR-I-5) and/or Policy CR-I-59.	<ul style="list-style-type: none"> <li>• Policy as amended that could impact Pacifica's dense development pattern</li> <li>• Adds a 50% threshold to replacement of shoreline protection structures</li> <li>• Directly relates to the new SSM definition</li> </ul>
6	195 & 306	6.44	CR-I-56: Existing Shoreline Protection Structures	Other modifications to existing shoreline protection structures which fall within the limitations of an exclusion contained in the definition of Substantial Exterior Structural Modification shall be considered to be an existing shoreline protection structure. This policy shall not be applied to justify the removal of a shoreline protection structure which protects any structure authorized to be constructed pursuant to an exclusion contained in the definition of Substantial Exterior Structural Modification.	Deleted	<ul style="list-style-type: none"> <li>• Deletes portion of policy that could impact Pacifica's dense development pattern</li> <li>• Directly relates to the new SSM definition</li> </ul>

## Theme: Coastal Resiliency – Shoreline Protection Structures continued

Chapter	Page #	Modification Number	Policy Number and/or Subject Addressed	City's Certification Draft	CCC Suggested Modification	Brief Summary
6	187 & 298	6.23	CR-I-25: Structure Elevation (0-2 feet SLR)	Maintain existing or construct shoreline protection structures if consistent with Policies CR-I-56 and CR-I-57 to limit wave overtopping unless beach nourishment strategies are effective in reducing wave run-up on the backshore. Elevate development structures if consistent with Policy CR-I-61 as necessary to mitigate flood damage, consistent with height limitations. Elevations of wave run-up and associated development thresholds shall be determined via a site-specific study.	Maintain existing or construct shoreline protection structures if consistent with Policies CR-I-56 and CR-I-57, and with any prior permit conditions and/or legal obligations pursuant to the California Coastal Act to limit wave overtopping unless beach nourishment strategies are effective in reducing wave run-up on the backshore. Elevate development structures if consistent with Policy CR-I-61, and with any prior permit conditions and/or legal obligations pursuant to the California Coastal Act as necessary to mitigate flood damage, consistent with height limitations, determined via a site-specific study.	<ul style="list-style-type: none"> <li>• Clarification to comply with Coastal Act provision.</li> <li>• Adds provision that requires consistency with prior permit conditions</li> <li>• Prevents revisions to permit conditions</li> </ul>
6	195 & 307	6.46	CR-I-58: Authorization Limits of Shoreline Protection Structures	Shoreline protection structures shall only be authorized until the time when the existing structure protected by such shoreline protection structure: 1) is/are no longer present, or 2) no longer require(s) armoring. This policy shall not be applied to justify the removal of a shoreline protection structure which protects any structure authorized to be constructed pursuant to an exclusion contained in the definition of Substantial Exterior Structural Modification.	Shoreline protection structures shall only be authorized until the time when the structure protected by such shoreline protection structure: 1) is/are no longer present, 2) no longer require(s) armoring, or 3) is redeveloped pursuant to the definition of a Substantial Structural Modification (SSM).	<ul style="list-style-type: none"> <li>• Amends policy that could impact Pacifica's dense development pattern</li> <li>• Directly relates to the SSM definition</li> </ul>

# Theme: Coastal Resiliency –Development

Chapter	Page #	Modification Number	Policy Number and/or Subject Addressed	City's Certification Draft	CCC Suggested Modification	Brief Summary
Glossary	225 & 308	7.1	Anticipated Life	N/A	The period over which a development is expected to be usable, with normal repairs and maintenance, for the purpose for which it was designed, typically a minimum of 75-100 years for residential and commercial development and a minimum of 100-150 years for critical infrastructure.	<ul style="list-style-type: none"> <li>New text from CCC's adopted guidance for residential development and critical infrastructure.</li> <li>Will result in greater hazard setbacks for new development</li> </ul>
Glossary	230 & 311	7.8	New Development	Development, as defined in Section 30106 of the California Coastal Act, where no existing development occurs. New Development does not include the remodeling or improvement of an existing structure, as defined, and also does not include any structure authorized to be constructed pursuant to an exclusion contained in the definition of Substantial Exterior Structural Modification.”.	Deleted	<ul style="list-style-type: none"> <li>Deletes text to clarify terms used in document</li> <li>Folded into the definition of Development</li> </ul>
6	193 & 304	6.41	CR-I-49: Substantial Modifications to Existing Structures.	Substantial Modifications to Existing Structures. When a proposed physical improvement to an existing structure would constitute a Substantial Exterior Structural Modification (SESM), as defined, the portion of the project constituting a SESM shall be undertaken consistent with the LCP and, if applicable, the Coastal Act, including but not limited to Policies CR-I-43 and CR-I-44. Any portion of the existing structure that remains and which is determined to be legally nonconforming with an LCP standard, including bluff setbacks or other hazard criteria, shall not be modified to increase the degree of nonconformity.	Substantial Structural Modifications. When proposed modifications to an existing structure constitute a Substantial Structural Modification (SSM), as defined, such proposed development shall correct any existing legal nonconformities and shall be undertaken consistent with the LCP and the Coastal Act, including but not limited to Policies CR-I-43 and CR-I-44.	<ul style="list-style-type: none"> <li>Amended to exclude Existing Structures and address existing legal nonconformities</li> <li>Applicable to more project types because the definition is expanded</li> </ul>

# Theme: Coastal Resiliency – Development

Page #	Modification Number	City's Certification Draft	CCC Suggested Modification	Brief Summary
232 & 311	7.10	<p>Any physical improvement which modifies an existing structure, as defined, to achieve in any of the following:</p> <ul style="list-style-type: none"> <li>i) a seaward encroachment of the structure; or</li> <li>ii) removal or replacement of 50 percent or more of the linear length of the exterior walls, whether or not the floor area or building footprint is expanded; or</li> <li>iii) an addition that includes new floor area at or below the first story equal to 50 percent or more of the structure's total existing floor area; or</li> <li>iv) an increase of the existing building footprint equal to 50 percent or more;</li> </ul> <p>but excluding any of the following:</p> <ul style="list-style-type: none"> <li>i) removal, replacement, or maintenance of nonstructural exterior components of exterior walls such as decorative siding, shingles, and roofing materials and windows;</li> <li>ii) development on any site which is protected from coastal erosion by an existing, permitted shore- line protection structure;</li> <li>iii) replacement of any structure pursuant to the provisions of subdivision (g) of Section 30610 of the Public Resources Code;</li> <li>iv) the demolition and reconstruction of a single-family residence; provided, that the reconstructed residence shall not exceed either the floor area, height or bulk of the former structure by more than 10 percent, and that the reconstructed residence shall be sited in the same location on the affected property as the former structure; or</li> <li>v) the reconstruction, repair, or maintenance of any shoreline protection structure; provided, however, that the reconstructed, repaired, or maintained shoreline protection structure is not seaward of the location of the former structure, and that such modifications do not increase the height or length of the former shoreline protection structure by more than 10 percent.</li> </ul> <p>Changes to exterior walls, floor area, height, length, or building footprint shall be measured cumulatively from those existing at the site on the date of certification of the LCLUP. The cost of improvements shall not be used as a basis in application of this definition or any policy relying thereupon unless expressly stated in the policy. Incremental changes that cumulatively amount to replacement of 50 percent or more over time shall also be considered a SSM.</p>	<p>Any physical improvement which modifies an existing structure in any of the following:</p> <ul style="list-style-type: none"> <li>i) alteration, removal or replacement of 50 percent or more of the linear length of the exterior walls, or other major structural components (including but not limited to floor, roof, and foundation structures), whether or not the floor area or building footprint is expanded; or</li> <li>ii) an addition that includes new floor area equal to 50 percent or more of the structure's total existing floor area; or</li> <li>iii) an increase of the existing building footprint equal to 50 percent or more;</li> </ul> <p>but excluding removal, replacement, or maintenance of nonstructural exterior components such as decorative siding, shingles, and windows.</p> <p>Incremental changes that cumulatively amount to replacement of 50 percent or more over time shall also be considered a SSM.</p>	<ul style="list-style-type: none"> <li>• Amends text to be consistent with CCC SLR guidance</li> <li>• May impact Pacifica's dense urban development</li> <li>• Add more project types of routine property improvements</li> <li>• Measures improvements cumulatively</li> </ul>

## Theme: Coastal Resiliency –Development

Chapter	Page #	Modification Number	Policy Number and/or Subject Addressed	City's Certification Draft	CCC Suggested Modification	Brief Summary
6	191 & 302	6.38	CR-I-43: Technical Reports.	<ul style="list-style-type: none"> <li>demonstrate that the development will avoid (or if unavoidable, minimize) impacts from coastal hazards to the maximum extent feasible; and</li> </ul>	<ul style="list-style-type: none"> <li>demonstrate that the development will avoid (or if unavoidable, minimize) impacts from coastal hazards for the anticipated life of the proposed development without reliance on any existing or future shoreline protection devices;</li> </ul>	<ul style="list-style-type: none"> <li>Applicability of Anticipate Life</li> <li>Does not allow reliance of existing shoreline structures</li> </ul>
6	192 & 303	6.40	CR-I-45: Assumption of Risk by Private Landowners.	Permit approvals of development on the shoreline shall require the applicant to: record a deed restriction requiring the owner to assume liability and indemnify and hold the City harmless, and make other acknowledgments relating to the risks of development on the property.	Permit approvals of development in Coastal Vulnerability Zones and Tsunami Evacuation Zones shall require the applicant to: record a deed restriction requiring the owner to assume liability and indemnify and hold the City, its officers, agents, and employees harmless, including any injury and/or damage from coastal hazards in connection with the permitted development; unconditionally waive any claim of damage from coastal hazards against the City; waive rights to future shoreline armoring; acknowledge the development may need to be removed and the site restored in response to future hazard conditions; and to assume all responsibility for any adverse effects to property caused by the permitted project and/or need for removal or relocation of development.	<ul style="list-style-type: none"> <li>Applicability to Coastal Vulnerability Zones</li> <li>Adds Tsunami Evacuation zones</li> <li>Applies to more properties</li> </ul>

## Theme: Coastal Resiliency

Chapter	Page #	Modification Number	Policy Number and/or Subject Addressed	City's Certification Draft	CCC Suggested Modification	Brief Summary
6	187 & 297	6.21	CR-I-23: Sharp Park Golf Course	<p>Sharp Park Golf Course. Strongly support the City and County of San Francisco's maintenance of the Sharp Park Golf Course berm and armoring, consistent with the Coastal Development Permit issued by the California Coastal Commission, including adaptation planning for the course, and protecting public access.</p> <p>The City of Pacifica shall strongly support the City and County of San Francisco's ongoing maintenance of the berm even if Coastal Commission termination of authorization is triggered by the conditions of approval or require construction of flood protection improvements by the City and County of San Francisco.</p>	Deleted	<ul style="list-style-type: none"> <li>Deletes policy text</li> </ul>

Questions?

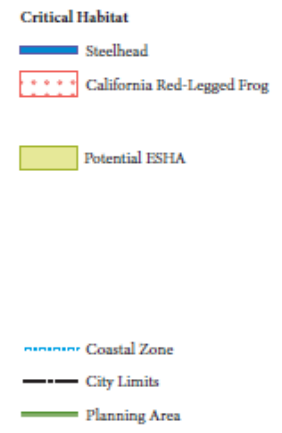




# Potential ESHA



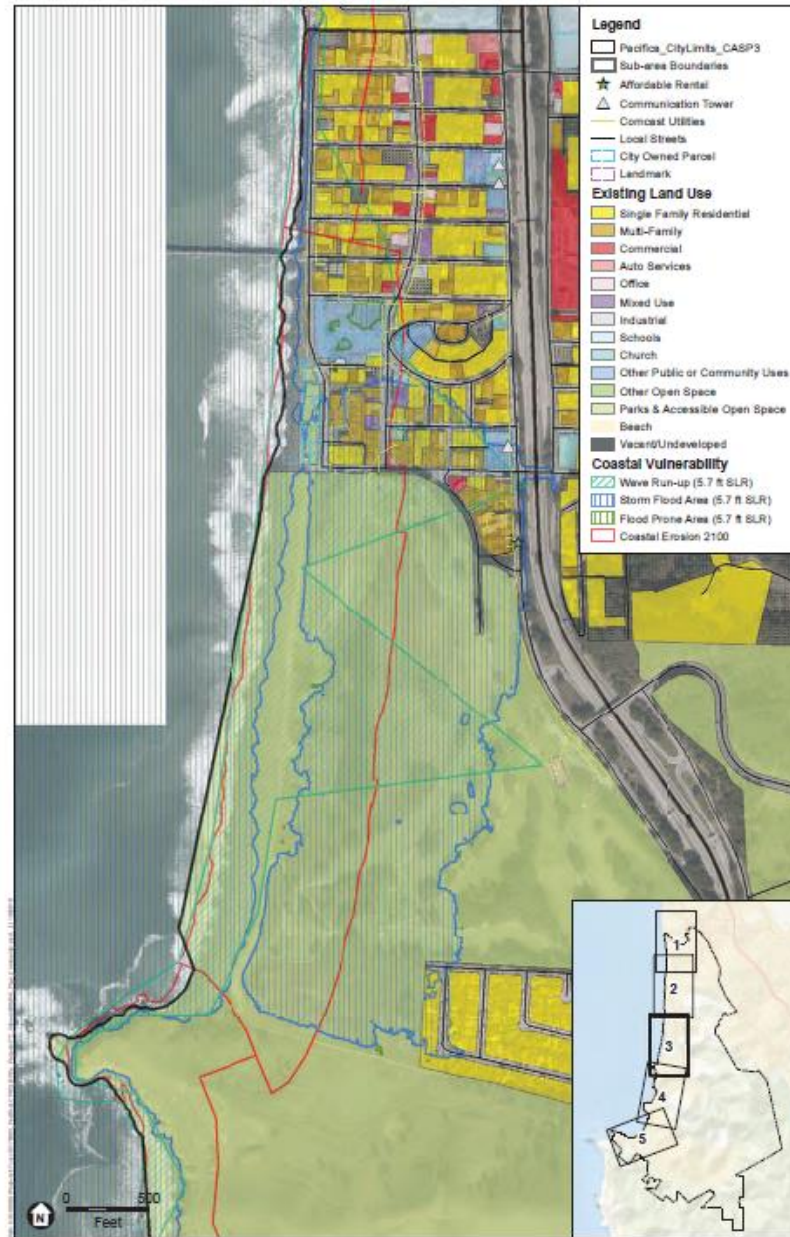
Figure 4-3:  
Sensitive and  
Critical Habitat



Note: The preliminary delineation of ESHA boundaries does not include an exhaustive compilation of the habitat areas that meet the ESHA definition. Site-specific biological evaluations and field observations shall be required to identify ESHAs and other special status resources that may not have been included in the literature and database review.

SOURCE: U.S. Fish & Wildlife Service 2019; National Marine Fisheries Service, 2019; National Park Service, 2009; California Dept of Forestry, 2017; California Natural Diversity Database, 2019; California Native Plant Society, 2019; California Dept of Fish & Game, 2019; FEMA, 2019; City of Pacifica, 2019; San Mateo County, 2019; Dyett

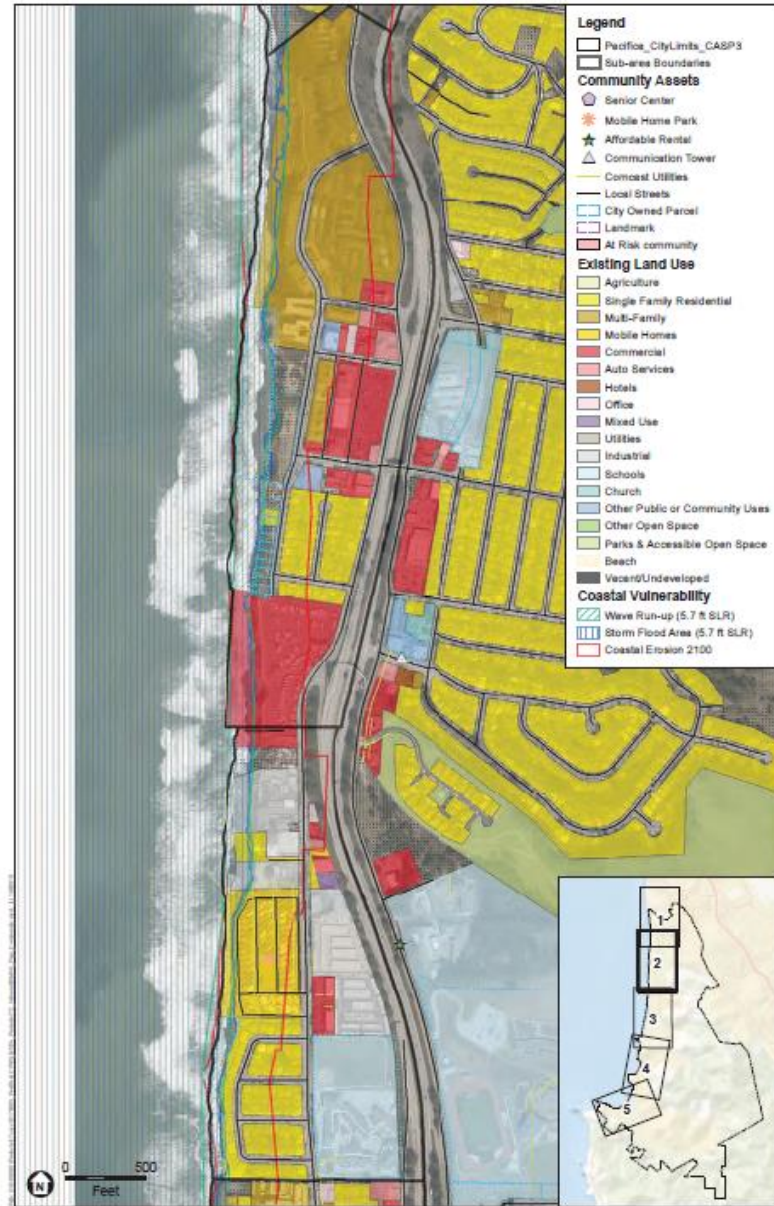
# Coastal Vulnerability Zone Map – West Sharp Park



SOURCE: San Mateo County 2017 Imagery; City of Pacific and SMC Assets (2017); Pacific Institute Scenario (2008); OCOF Coastal Flooding (2014)

Disclaimer: The Coastal Vulnerability Zone (CVZ) maps utilized the best available data at the time of preparation. The erosion scenario does not account for existing shoreline protection structures. This information is continually evolving and the maps reflect a long planning horizon recognizing typical design life of structures. Updated models and site-specific analysis may identify that the respective CVZs may have shifted to include more or less area. CVZ maps are not designed to be parcel-specific and should not be used for real estate, financing, or insurance transactions, or other uses such as navigation, permitting, or regulatory uses. To confirm vulnerability potential, further studies should be performed for CVZs. CVZ projections were sourced from publicly available data and existing models not created by the City of Pacific.

# Coastal Vulnerability Zone Map – West Edgemar & West Sharp Park



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2	24	2.1	Parks and Open Space	Sandy beach areas;	including properties that are fully on beaches or coastal dunes or bluffs;	New text
2	26	2.2	Coastal Development Review	These exemptions are generally set forth in Section 30610 of the PRC and Sections 13252, 13252, and 13250 of the California Code of Regulations (CCR)	These exemptions are generally set forth in Section 30610 of the PRC and Sections 13252, 13253, and 13250 of the California Code of Regulations (CCR).	Typo Correction
2	26	2.3	LD-I-2: Land Divisions in the Coastal Zone	N/A	Prohibited on properties that are within the Coastal Vulnerability Zones, unless the resulting parcels are set aside for conservation, or unless the resulting parcels can be developed consistent with the LCP.	Restates Coastal Act prohibition on intensifying land use/subdividing land in hazard areas.
2	26	2.4	LD-I-3: Coastal Development Permit Findings	N/A	In advance of updating the Implementation Plan for conformance with the policies of this 2023 Land Use Plan, the policies of the Land Use Plan shall provide the standard of review for any proposed new development, including where these policies are more protective of ESHA and other coastal resources and maximizing public access as consistent with the Coastal Act.	Resolves potential conflicts during transition period following LCLUP certification until General Plan and zoning (Implementation Plan, or IP) is updated.
2	35	2.5	Central Pacifica Coastal Zone	Any development of the Quarry site will require detailed evaluation of biological resources to ensure that sensitive habitat and wetlands are protected; the likely footprint of development could be much smaller than the area designated.	Any development of the Quarry site will require detailed evaluation of biological resources to ensure that sensitive habitat and wetlands are protected; and should be sited and designed to minimize coastal hazard risks in accordance with policies in Chapter 5 and 6 of the LUP. The likely footprint of development could be	Restates coastal development requirements related to hazards and refers to the relevant Chapters 5 and 6 of the LCLUP.

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					much smaller than the area designated.	
2	40	2.6	LD-I-14: Promenade Area and Beach Boulevard Property	Enhance the Promenade area as a local community and tourist destination.	Enhance the Promenade area as a local community and tourist destination, while also ensuring that it adequately responds to and addresses coastal hazard considerations consistent with the LCP.	Policy as amended that could impact development on the site - To be discussed
2	40	2.6	LD-I-14: Promenade Area and Beach Boulevard Property	The preferred use is a hotel if market conditions allow, but other appropriate uses will include a conventional commercial/residential mixed-use project with cafes, restaurants, retail, and upper-level housing. The mix of uses for any non-hotel project shall emphasize uses that are of interest to visitors and that generate revenues for the City.	Appropriate uses could include a hotel or conventional commercial/residential mixed-use project with cafes, restaurants, retail, and upper-level housing, if such uses are deemed appropriate considering coastal hazards and the required protections for coastal resources. The mix of uses for any proposal shall emphasize uses that are of interest to visitors and that generate revenues for the City.	Eliminates hotel as preferred use, but hotel is allowed
2	40	2.7	LD-I-16: Rockaway Quarry Site	Enable the responsible development and environmental conservation of the Quarry Site.	Enable the responsible development and environmental conservation of the Quarry Site, considering the potential coastal hazard constraints (including but not limited to bluff erosion, slope stability, and flooding), as well as the biological constraints (specific to sensitive species, environmentally sensitive habitat areas, and wetlands) and coastal resource protection more broadly.	Restates coastal development requirements related to hazards and biological resources protections.

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2	40	2.7	LD-I-16: Rockaway Quarry Site	Allowable development should provide City revenues substantial public open space, and commercial uses and public spaces attractive to both visitors and local residents.	Allowable development should provide community benefits, including substantial public open space, and commercial uses and public spaces attractive to both visitors and local residents.	Revised City revenues to community benefits.
2	41	2.8	LD-I-20: Undeveloped San Pedro Avenue Site	Establish a Coastal Residential Mixed Use zoning district to allow small-scale visitor-oriented commercial uses as a stand-alone project without any residential development, or small-scale visitor-oriented commercial uses with residential development at a density range of three to five units per gross acre. Housing may be clustered, and uses may be mixed vertically or horizontally. Residential uses may be constructed attached to or detached from commercial uses, provided the overall site contains both commercial and residential uses. Development must include public coastal access and must provide public open space.	Establish a Coastal Residential Mixed Use zoning district to allow small-scale visitor-oriented commercial uses as a stand-alone project without any residential development, or small-scale visitor-oriented commercial uses with some low density residential development. Housing may be clustered, and uses may be mixed vertically or horizontally. Residential uses may be constructed attached to or detached from commercial uses, provided the overall site contains both commercial and residential uses.	Deletes specified density range for the San Pedro Ave site.
	41	2.8	LD-I-20: Undeveloped San Pedro Avenue Site	Establish a Coastal Residential Mixed Use zoning district to allow small-scale visitor-oriented commercial uses as a stand-alone project without any residential development, or small-scale visitor-oriented commercial uses with residential development at a density range of three to five units per gross acre. Housing may be clustered, and uses may be mixed vertically or horizontally. Residential uses may be constructed attached to or detached	Development must include public coastal access, provide public open space, and consider all biological constraints.	Clarification

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				from commercial uses, provided the overall site contains both commercial and residential uses. Development must include public coastal access and must provide public open space.		
2	42	2.9	LD-I-26: Enhanced Visitor Node	Create a visitor-oriented commercial and hospitality node at Rockaway Beach and on developable portions of the Rockaway Quarry site which contains distinctive design, uses, and recreational opportunities.	Taking all site constraints into account, create a visitor-oriented commercial and hospitality node at Rockaway Beach and on developable portions of the Rockaway Quarry site which contains distinctive design, uses, and recreational opportunities.	Restates coastal development requirements related to considering site constraints such as coastal hazards.
2	43	2.10	Development Capacity and Projections	As noted above, the Quarry site's development capacity may be further reduced by site-specific analyses of geotechnical and biological.	As noted above, the Quarry site's development capacity may be further reduced by site-specific analyses of geotechnical and biological constraints.	Typo Correction
2	48	2.11	LD-I-27: Public Service Priorities	Ensure that needs generated by development or uses permitted over the planning period are adequately served by existing and planned public works facilities.	Ensure that needs generated by development or uses permitted over the planning period are adequately served by existing and planned public works facilities, and plan for the maintenance, operation, expansion and improvement to public facilities considering threats from coastal hazards. Support studies that evaluate the condition of critical facilities, especially public works infrastructure that has been identified as vulnerable to hazards. Studies shall include alternatives analyses for potential retrofit, improvements, relocation, or other considerations.	Requires analysis of alternatives for potential retrofit or relocation but does not mandate relocation.

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2	49	2.12	LD-I-37: Public Services for New Developments	N/A	Public Services for New Development. Development shall only be approved if it can be shown that it can be accommodated by adequate and sustainable public services (including in terms of water, sewer, and circulation) without any significant impacts to coastal resources. Public service development shall be limited to levels that are sufficient to accommodate LCP consistent development, including at buildout, and shall not be allowed if it would be growth inducing past that threshold.	New policy applicable to new development. As proposed, the policy may impact infrastructure that serves areas outside the Coastal Zone - To be discussed
3	55	3.1	Coastal Access Points	Maintain public parking as part of redevelopment of City-owned 2212 Beach Boulevard property.	Maintain public parking as part of redevelopment of City-owned 2212 Beach Boulevard property and maintain lateral access along Beach Boulevard to the Pier.	Adds requirement for lateral access
3	57	3.2	Coastal Access Points	N/A	Conduct a prescriptive rights study.	Requires additional study
3	57	3.2	Coastal Access Points	N/A	Conduct a prescriptive rights study.	Requires additional study



Chapter	Page #	Modification Number	Policy Number and/or Subject Addressed	City's Certification Draft	CCC Suggested Modification	Brief Summary
3	59	3.3	PR-I-8: Temporary Events	N/A	<p>Only temporary event meeting all the above criteria shall require coastal development permit review, however, the Planning Director may also exclude from permit requirements temporary events meeting all the above criteria when:</p> <ul style="list-style-type: none"> <li>• The fee is for preferred seating only and more than 75% of the provided seating capacity is available free of charge for general public use; or,</li> <li>• The event is held on sandy beach area in a remote location with minimal demand for public use, and there is no potential for adverse effect on sensitive coastal resources; or</li> <li>• The event is less than one day in duration; or</li> <li>• The event has previously received a coastal development permit and will be held in the same location, at a similar season, and for the same duration, with operating and environmental conditions essentially the same as those associated with the previously-approved event.</li> </ul> <p>The Planning Director (or the Coastal Commission's Executive Director if the Planning Director's determination is challenged) may determine that a temporary event, even an event that</p>	New policy text.

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					<p>might otherwise not require a coastal development permit per this section above, shall require a coastal development permit if he/she determines that unique or changing circumstances exist relative to the particular temporary event that have the potential for significant adverse impacts on coastal resources. Such circumstances may include, but shall not be limited to, the following:</p> <ul style="list-style-type: none"> <li>• The event, either individually or together with other temporary events scheduled before or after the particular event, precludes the general public from use of a public recreational area for a significant period of time; or</li> <li>• The event and its associated activities or access requirements will either directly or indirectly impact environmentally sensitive habitat areas, rare or endangered species, significant scenic resources (including as mapped on the LCP Land Use Plan maps or as determined during project review), or other coastal resources; or</li> <li>• The event is scheduled between Memorial Day weekend and Labor Day and would restrict public use of roadways or parking areas or</li> </ul>	

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					<p>otherwise significantly impact public use or access to coastal waters; or</p> <ul style="list-style-type: none"> <li>The event has historically required a coastal development permit to address and monitor associated impacts to coastal resources. Temporary events located solely within the Coastal Commission's original coastal development permit jurisdiction area require review and determination of coastal development permit requirement or temporary event exemption from the Coastal Commission</li> </ul>	
3	61	3.4	PR-I-12: Coastal Access Point South of San Francisco RV Park	Lateral access along the bluffs should be provided from this coastal access point to City- and Coastal Commission-required public access at San Francisco RV Park to the north, and to properties to the south upon future redevelopment.	Lateral access along the bluffs as well as vertical trail improvements should be provided from this coastal access point to City- and Coastal Commission-required public access at San Francisco RV Park to the north, and to properties to the south upon future redevelopment.	Inclusion of vertical trail improvements.
3	69	3.5	PR-I-24: Sharp Park	Support the continued operation of golf at Sharp Park Golf Course consistent with redeveloping source protection, natural hazard, and coastal vulnerability policies, and support development of additional recreational uses in upland portions of the Park located outside the Coastal Zone east of Highway 1.	Support the continued operation of golf at Sharp Park Golf Course consistent with redeveloping source protection, natural hazard, and coastal vulnerability policies, existing CDP terms and conditions, and support development of additional recreational uses in upland portions of the Park located outside the Coastal Zone east of Highway 1.	Clarification

Chapter	Page #	Modification Number	Policy Number and/or Subject Addressed	City's Certification Draft	CCC Suggested Modification	Brief Summary
3	73	3.6	PR-G-11: Trail System Expansion	Expand the trail system in Pacifica to create a connected trail network with communitywide links to open space and recreation facilities, as shown on Figure 3-3.	Expand the trail system in Pacifica to create a connected trail network with communitywide links to open space and recreation facilities, as shown on Figure 3-3, and to enhance and augment California Coastal Trail connections and connectivity.	Adds requirement for California Coastal Trail
3	85	3.7	PR-I-57: Roadway Retrofits	Roadway retrofits will require additional analysis.	Roadway retrofits will require additional analysis, such as coastal hazard concerns in areas within the Coastal Zone.	Clarification
3	86	3.8	PR-I-60: Roadway Abandonment /Vacation and Public Access	Do not abandon, vacate, or render unusable any City-owned right-of-way, unless necessary for reasons of public safety or environmental conservation. Whenever public roadways are proposed to be abandoned, assess the value of maintaining public pedestrian and/or bicycle access, especially where coastal access can be maintained or improved. Abandonment/vacation of any public rights-of-way that may negatively affect coastal resources or public access to the sea will require a coastal development permit. Any public right-of-way that cannot be maintained in a condition suitable for public use shall be offered to another public agency or private association that agrees to maintain the right-of-way for public use.	Do not abandon, vacate, or render unusable any City-owned roadways and/or rights-of-way, unless necessary for reasons of public safety or environmental conservation. Whenever public roadways and/or rights-of-way are proposed to be abandoned, assess the value of maintaining public pedestrian and/or bicycle access, especially where coastal access can be maintained or improved. Abandonment/vacation of any public roadways and/or rights-of-way requires a coastal development permit, which shall only be approved if coastal resources can be protected in as good or better conditions as exist at the time of permit evaluation, and subject to terms and conditions to ensure the public's interests are maintained moving forward.	Amended to include City-owned roadway
4	96	4.1	Surface Water	Some of the watersheds drain directly into the ocean, while other feed one of five.	Some of the watersheds drain directly into the ocean, while other feed one of five creeks.	Typo Correction

Chapter	Page #	Modification Number	Policy Number and/or Subject Addressed	City's Certification Draft	CCC Suggested Modification	Brief Summary
4	99	4.2	Wetlands	N/A	Importantly, wetlands in the coastal zone only need meet one parameter (i.e., hydrology, hydric soils, or hydrophytic species) to be considered a wetland, as differentiated from three parameter delineations which require all three to be present (e.g., ACOE delineations).	Clarification
4	101	4.3	ER-I-1: Creek Protection and Restoration.	Requiring a minimum of 100 feet setbacks from the top of creek banks, or from the outer edge of riparian vegetation, where it exists, for development proposed adjacent to creeks, in keeping with City regulations and Best Management Practices. Exceptions to such buffer requirements should be supported by a biological report demonstrating that the adjusted buffer, in combination with incorporated siting, design or other mitigation measures, shall prevent impacts that significantly degrade the creek. Buffer adjustments should also be limited to where the entire subject legal lot is within the buffer or where it is demonstrated that development outside the buffer would have a greater impact on the creek.	Requiring a minimum of 100 feet setbacks from the top of creek banks, or from the outer edge of riparian vegetation, where it exists, whichever is further, for development proposed adjacent to creeks, in keeping with City regulations and Best Management Practices. The 100-foot buffer may be reduced by the minimum necessary (1) to avoid a taking (for private development), or (2) to provide required public services (for public development), provided that the buffer is as close to 100 feet as possible, and no less than 50 feet in any case, and provided that creek resource impacts are avoided as much as possible, and unavoidable impacts commensurately mitigated, all as conclusively demonstrated by a qualified biologist to the satisfaction of the City, USFWS, and CDFW.	Amended text to clarify exceptions. - To be discussed

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4	102	4.3	ER-I-1: Creek Protection and Restoration.	N/A	Permitted uses within buffer zones are limited to uses dependent on the resources within these areas and their buffer zones (i.e. habitat management and restoration, scientific research and educational activities, and low-intensity public access and recreation). Temporary disruption (e.g. less than six months) for the construction, alteration, repair, and maintenance of existing or newly permitted facilities or structures is allowed if there are no feasible alternatives, the disruption area is restored to its pre- disruption state or better within one year from the initial point of impact and there is no significant ground disturbance.	New policy text. - To be discussed
4	106	4.4	Plant Communities and Wildlife Habitats	Plant communities and habitats found in Pacifica are briefly described below and depicted in Figure 4-2, Vegetation. The EIR for the General Plan and Local Coastal Land Use Plan Update includes a more detailed description of each of these communities and habitats. The listed species and habitats here are not intended to preclude the possibility that other species or habitat occur within Pacifica. Species identified with various plant communities or habitats are not necessarily in the Planning Area. Some of these communities are recognized as "special status communities," or provide critical habitat for special status species.	Plant communities and habitats found in Pacifica are briefly described below and depicted in Figure 4-2, Vegetation. The map is illustrative and for information purposes only; site-specific biological studies are required as part of proposed development review to determine the presence and extent of plant communities and habitat. The mapped communities and habitats are not intended to preclude the possibility that other communities or habitat occur within Pacifica, nor to definitively conclude that. The plant communities or habitats identified are present as indicated, rather the map is a tool to help identify areas where further evaluation for biological issues may be relevant.	Clarification

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4	107	4.5	Annual Grasslands	Annual Grasslands	Grasslands	Generalizes language
4	107	4.5	Annual Grasslands	Northern coastal scrub habitat is found on undeveloped slopes, often in a mosaic with annual grasslands. Northern maritime chaparral, a special-status community, is included in this category. Northern coastal scrub is dominated by either coyote brush or California sagebrush, depending on slope aspect.	Northern coastal scrub habitat is found on undeveloped slopes, often in a mosaic with grasslands. Northern maritime chaparral, a special-status community, is included in this category. Northern coastal scrub dominated by either coyote brush or California sagebrush, primarily depending on slope aspect.	Generalizes language
4	108	4.6	Seasonal Wetlands and Ponds	Seasonal Wetlands and Ponds	Wetlands and Ponds	Generalizes language
4	108	4.6	Seasonal Wetlands and Ponds	Seasonal Wetlands occur in smaller drainages and localized depressions, forming ponds or flowing water, and are underlain by saturated soils during the winter and spring. Seasonal wetlands also occur along the banks and sediments that accumulate in creeks, Wetlands in Pacifica are found along riparian areas, drainages, along the coast, and as fresh and brackish water marshes (such as on the Sharp Park Golf Course). Vegetation and wildlife found in wetlands varies with water characteristics, inundation patterns, surrounding habitat, and level of disturbance.	Wetlands occur in smaller drainages and localized depressions, forming ponds or flowing water. Wetlands also occur along in creeks, riparian areas, drainages, along the coast, and as fresh and brackish water marshes (such as on the Sharp Park Golf Course). Vegetation and wildlife found in wetlands varies with water characteristics, inundation patterns, surrounding habitat, and level of disturbance.	Clarification

Chapter	Page #	Modification Number	Policy Number and/or Subject Addressed	City's Certification Draft	CCC Suggested Modification	Brief Summary
4	109	4.6	Special-Status Species	<p>SPECIAL-STATUS SPECIES IN SEASONAL WETLANDS AND PONDS</p> <p>The California red-legged frog, San Francisco garter snake, Leech's skyline diving beetle, San Francisco forktail damselfly, Tomales isopod, western pond turtle, and bristly sedge are special-status species that may be found in wetlands around Pacifica. The wetlands in Sharp Park are also known to support saltmarsh common yellowthroat. Seasonal wetlands and ponds at Mori Point and Sharp Park Golf Course to support the California red-legged frog as well as the San Francisco garter snake.</p>	<p>SPECIAL-STATUS SPECIES IN WETLANDS AND PONDS</p> <p>The California red-legged frog, San Francisco garter snake, Leech's skyline diving beetle, San Francisco forktail damselfly, Tomales isopod, western pond turtle, and bristly sedge are special-status species that may be found in wetlands in and around Pacifica. The wetlands in Sharp Park are also known to support saltmarsh common yellowthroat. Seasonal wetlands and ponds at Mori Point and Sharp Park Golf Course also known to support the California red-legged frog as well as the San Francisco garter snake.</p>	Generalizes language
4	110	4.7	N/A	N/A	<p>Dune habitat includes areas with sandy substrates proximate to the marine environment and may range from bare to vegetated with species typical of foredune and dune scrub communities, including non-natives such as ice plant and invasive grasses. Dune form topography may or may not be evident, depending on the condition of the dune and past land use or invasions, but may be readily restored. While most dunes occur near sea level, there are several examples of perched dune systems atop bluffs in Pacifica, where aeolian forces have created the substrate and processes appropriate to support dune vegetation. All areas that meet this definition of Dunes are categorically considered ESHA.</p>	New text - To be discussed



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4	112	4.8	Potential Environmentally Sensitive Habitat Areas (ESHAs)	Figure 4-3 identifies potential ESHAs in the Planning Area. Potential ESHAs include all designated critical habitat for Endangered or Threatened Species; special status communities <sup>10</sup> ; and areas designated as "other potential Environmentally Sensitive Habitat Areas".	Figure 4-3 identifies potential ESHAs in the Planning Area in three general categories: wetland, stream/riparian, and other terrestrial ESHAs. These potential ESHAs include all current designated critical habitat for Endangered or Threatened Species; known special status communities <sup>10</sup> ; and areas designated as "other potential Environmentally Sensitive Habitat Areas". Figure 4-3 is meant to serve as a flag for further studies to be undertaken when development is proposed. However, the map is illustrative and for information purposes only; site-specific biological studies are required as part of proposed development review to determine the presence and extent of ESHA and its required buffer zone. And other information than Figure 4-3 may dictate the need for such studies as well (e.g., site evaluation, other studies nearby, etc.), even if the area is not mapped as potential ESHA on Figure 4-3.	Clarification
4	116	4.9	ER-G-6: Coastal Environment and Special Species Status Communities	Conserve and protect beaches, sand dunes, coastal bluffs, and special status communities, particularly the Coastal bluff scrub on the northern bluffs.	Conserve and protect beaches, sand dunes, coastal bluffs, and special status communities, particularly the Coastal bluff scrub on the northern bluffs. Prohibit development in coastal dunes to preserve dune formations, vegetation, and wildlife habitats. Prevent overuse in dune areas by mechanisms such as restricting parking and directing pedestrian traffic	New text/Clarification

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					through signage and sand fencing to areas capable of sustaining such use. Prohibit motor vehicles in dune areas except for emergency purposes, and prohibit motor vehicles in non-dune beach areas except for emergency and essential maintenance purposes and where previously coastal permitted.	
4	116	4.10	ER-G-7: Creeks and Riparian Areas as Habitat	Protect year-round creeks and their riparian habitats.	Protect year-round and intermittent creeks and their riparian habitats.	Clarification
4	117	4.11	ER-I-21: Protection of Biological Resources with New Development	2) Pre-construction plant and wildlife surveys: Project applicants shall engage a qualified biologist to conduct presence/absence biological surveys for sensitive plant and wildlife species prior to construction adjacent to or within identified special status communities and other sensitive areas identified in Figure 4-3. If special status species are identified, the qualified biologist shall consult with the California Department of Fish and Wildlife (CDFW) and establish no-disturbance buffers around the special status specie to avoid disturbance and direct impacts to these resources during construction. If no special status species are detected during surveys, then construction-related activities may proceed. Nesting birds, in particular, are protected by two means; they receive protection under the Migratory Bird Treaty Act, and nesting raptors (in the order	2) Pre-construction plant and wildlife surveys: Project applicants shall engage a qualified biologist to conduct presence/absence biological surveys for sensitive plant and wildlife species prior to construction adjacent to or within areas identified as potential ESHAs on Figure 4-3, or as otherwise indicated and needed. If special status species are identified, the qualified biologist shall consult with the California Department of Fish and Wildlife (CDFW) and establish no-disturbance buffers around the special status specie to avoid disturbance and direct impacts to these resources during construction. If no special status species are detected during surveys, then construction-related activities may proceed. Nesting birds, in particular, are protected by two means; they receive protection under the Migratory Bird Treaty Act, and nesting raptors (in the order	Clarification

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				Falconiformes or Strigiformes) are protected under the State Fish and Game Code, §3503.5.	Falconiformes or Strigiformes) are protected under the State Fish and Game Code, §3503.5.	
4	117	4.11	ER-I-21: Protection of Biological Resources with New Development	3) Require biological resource assessments be conducted prior to approval for any development within 300 feet of creeks, wetlands, or other sensitive habitat areas shown on Figure 4-3 of the General Plan.	3) Require biological resource assessments be conducted prior to approval for any development within 300 feet of creeks, wetlands, or other sensitive habitat areas. Such assessment shall identify means to avoid impacts to any such resources (including through siting, design, and LCP required buffers), and means of enhancing resources and providing offsetting and commensurate mitigation for unavoidable impacts that are LCP allowable.	Clarification; however, reference to Figure should not be deleted.
4	117	4.11	ER-I-21: Protection of Biological Resources with New Development	4) Require on-site monitoring of biological resources by a qualified biologist throughout the duration of construction activity.	4) Require on-site monitoring of biological resources by a qualified biologist throughout the duration of construction activity and afterwards, should approval conditions warrant.	Clarification

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4	118	4.12	ER-I-23: Verification of ESHA	N/A	Historical evidence of ESHA	Adds new sub-policy under Verification of ESHA
4	118	4.13	ER-I-24: Management of ESHA	No new development shall be allowed within primary habitat areas with the exception of resource-dependent uses that can be demonstrated to have no significant adverse impact.	No new development shall be allowed within ESHA with the exception of resource-dependent uses (such as habitat management and restoration, scientific research and educational activities, and low-intensity public access and recreation) that can be demonstrated to have no significant disruption of habitat values.	Clarification
4	118	4.13	ER-I-24: Management of ESHA	<ul style="list-style-type: none"> <li>• Buffer areas shall be established around all sensitive resources, providing a minimum of 100 feet, and varying as needed to account for feeding, breeding, nesting, and other habitat requirements. Exceptions to such buffer requirements should be supported by a biological report demonstrating that the adjusted buffer, in combination with incorporated siting, design or other mitigation measures, will prevent impacts that significantly degrade the ESHA and will be compatible with the continuance of the ESHA. Buffer adjustments should also be limited to where the entire subject legal lot is within the buffer or where it is demonstrated that development outside the buffer would have a greater impact on the ESHA.</li> </ul>	<ul style="list-style-type: none"> <li>• Buffer areas shall be established around all ESHA, providing a minimum of 100 feet, and may be expanded as needed to account for feeding, breeding, nesting, and other habitat requirements. The 100-foot buffer may be reduced by the minimum necessary (1) to avoid a taking (for private development), or (2) to provide required public services (for public development), provided that the buffer is as close to 100 feet as possible, and no less than 50 feet in any case, and provided that ESHA resource impacts are avoided as much as possible, and unavoidable impacts commensurately mitigated, all as conclusively demonstrated by a qualified biologist to the satisfaction of the City, USFWS, and CDFW.</li> </ul>	Clarification to comply with Coastal Act provision. - To be discussed

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4	118	4.13	ER-I-24: Management of ESHA	<ul style="list-style-type: none"> <li>Alteration of landforms, removal of vegetation, impervious surfaces, noise, light, and glare shall be minimized.</li> </ul>	<ul style="list-style-type: none"> <li>Alteration of landforms, removal of vegetation, impervious surfaces, noise, light, and glare shall be minimized as much as possible.</li> </ul>	Amended text to clarify exceptions.
4	119	4.14	ER-I-28: Construction during Nesting Season	<p>If site work or construction occurs during the nesting season (February 1 through August 31), then pre-construction breeding bird surveys shall be performed by a qualified wildlife biologist prior to any site disturbance to ensure that no nests will be disturbed or destroyed during Project implementation. If an active nest is found sufficiently close to work areas to be disturbed by construction activities, then the biologist shall create a no-disturbance buffer of 250 feet around passerine nests and a 500 foot buffer around raptor nests. Work-free buffer zones shall be maintained until after the breeding season or until after the qualified biologist determines the young have fledged (usually late June through mid-July). Nests initiated during active construction would be presumed to be unaffected by the activity, and a buffer zone around such nests is not necessary. However, nests shall be flagged and construction activity shall avoid killing and/or injuring nesting birds.</p>	<p>If site work or construction occurs during the nesting season (February 1 through August 31), then pre-construction breeding bird surveys shall be performed by a qualified wildlife biologist prior to any site disturbance to ensure that no nests will be disturbed or destroyed during Project implementation. If an active nest is found sufficiently close to work areas to be disturbed by construction activities, then the biologist shall create a no-disturbance buffer of 250 feet around passerine nests and a 500 foot buffer around raptor nests. Work-free buffer zones shall be maintained until after the breeding season or until after the qualified biologist determines the young have fledged (usually late June through mid-July).</p>	Deletes text

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4	120	4.15	ER-I-30: Protection of the California Red-Legged Frog and San Francisco Garter Snake	To minimize disturbance, require all grading activity within 100 feet of aquatic habitat shall be conducted during the dry season (May 1 through October 15) to protect California red-legged frog and San Francisco garter snake. A qualified biologist shall conduct presence/absence surveys for California red-legged frog and San Francisco garter snake prior to construction in or adjacent to riparian areas, grasslands near ponds/wetlands, or other sensitive habitat. Any individuals identified shall be treated in consultation with USFWS. Construction shall follow accepted procedures for exclusion and avoidance of California red-legged frog and San Francisco garter snake and their habitat. Additionally, the biologist shall supervise the installation of exclusion fencing along the boundaries of the work area, shall conduct environmental awareness training for construction workers, and shall be present during initial vegetation clearing and ground-disturbing activities.	Allowed construction activity with the potential to impact California red-legged frogs and San Francisco garter snake shall be conducted during the dry season (May 1 through October 15) to protect California red-legged frog and San Francisco garter snake. In such cases a qualified biologist shall conduct presence/absence surveys for California red-legged frog and San Francisco garter snake prior to construction in or adjacent to riparian areas, grasslands near ponds/wetlands, or other sensitive habitat. Any individuals identified shall be treated in consultation with USFWS. Construction shall follow accepted procedures for exclusion and avoidance of California red-legged frog and San Francisco garter snake and their habitat. Additionally, the biologist shall supervise the installation of exclusion fencing along the boundaries of the work area, shall conduct environmental awareness training for construction workers, and shall be present during initial vegetation clearing and ground-disturbing activities.	Clarification
4	121	4.16	ER-I-39: Bowl Site	Establish appropriate zoning for the "Bowl" site along the east side of Palmetto Avenue in Fairmont West for Planned Development to ensure site planning that clusters development, avoiding potential flooding or	Establish appropriate zoning for the "Bowl" site along the east side of Palmetto Avenue in Fairmont West for Planned Development to ensure site planning that clusters development, avoiding potential flooding or geotechnical hazards and protecting	Clarification

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				geotechnical hazards and protecting open space resources.	open space resources, and taking all other coastal resources site constraints into consideration.	
5	132	5.1	Natural Hazards	Ensuring the safety of community members, through protection from hazards, is an essential service of public agencies and a critical priority for maintaining community health. The purpose of the Natural Hazards chapter is to establish goals and policies to mitigate the potential impacts from natural and man-made hazards that pose a threat to public health, and safety.	Ensuring the safety of community members, through protection from hazards, is an essential service of public agencies and a critical priority for maintaining community health. The purpose of the Natural Hazards chapter is to establish goals and policies to mitigate the potential impacts from natural and man-made hazards that pose a threat to public health, safety, and coastal resources.	Clarification
5	133	5.2	Coastal Bluffs	A bluff is a high bank or bold headland with a broad, precipitous, sometimes rounded cliff face overlooking a plain or body of water.	Deleted	Deletes text
5	140	5.3	NH-G-1: Reduce Risk	Minimize risks of property damage and personal injury posed by geologic and seismic hazards.	Protect coastal resources, and minimize risks of property damage and personal injury posed by geologic, seismic and coastal hazards.	Clarification
5	141	5.4	NH-I-9: Erosion Prevention	Require erosion prevention of hillside areas by revegetation or other acceptable methods.	Deleted	Deletes text - To be discussed
5	142	5.5	NH-I-10: Geotechnical Studies	<ul style="list-style-type: none"> <li>• Within 50 feet of a bluff edge.</li> </ul>	<ul style="list-style-type: none"> <li>• Within 300 feet of a bluff edge in Coastal Vulnerability Zones.</li> </ul>	Amends policy to include Coastal Vulnerability Zones.

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5	142	5.5	NH-I-10: Geotechnical Studies	Geotechnical studies shall identify any geologic hazards affecting the proposed project site, any necessary mitigation measures, and a statement of the site's suitability for the proposed development and whether or not it will be safe from geologic hazard for its expected life.	Geotechnical studies shall identify any geologic hazards affecting the proposed project site, any necessary mitigation measures, and a statement of the site's suitability for the proposed development and whether or not it will be safe from geologic hazard for its anticipated life.	Amended to be consistent with new definitions
5	143	5.6	NH-I-17: New Development in Coastal Zone	<ul style="list-style-type: none"> <li>• Not accelerate the need for a shoreline structure or increase the likelihood of a future seawall beyond the existing development's expected life;</li> <li>• Not violate required coastal resource setback provisions.</li> </ul> Small improvement projects are exempt, including improvements that would increase height, bulk or floor area by less than ten percent.	<ul style="list-style-type: none"> <li>• Not violate required coastal resource setback provisions.</li> </ul>	Clarification
5	144	5.7	Flood Zones	Flood hazards mapped by FEMA to support the development of Flood Insurance Rate Maps (FIRMs) generally identify areas of greater flood risk (100 and 500 year events) in the lower reaches of the main stream channels, and the risk of coastal flooding along the shoreline. Flood zones based on the FIRMs are shown in Figure 5-3.	Flood hazards mapped by FEMA to support the development of Flood Insurance Rate Maps (FIRMs) generally identify areas of greater flood risk (100 and 500 year events) in the lower reaches of the main stream channels, and the risk of coastal flooding along the shoreline, although they do not account for climate change or sea level rise, and thus should be reviewed in conjunction with Appendix B ("Coastal Zone Vulnerability Maps"). Flood zones based on the FIRMs are shown in Figure 5-3.	Clarification



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5	147	5.8	NH-G-2: Development in Hazardous Areas	Protect development in 100-year floodplains and tsunami hazard zones with (e.g. flood damage prevention programs).	Site and design development in 100-year floodplains and tsunami hazard zones to minimize hazard risk without the need for armoring (e.g. flood damage prevention programs).	Clarification
5	148	5.9	NH-I-24: Flood Hazard Reduction	Flood Hazard Reduction. Continue to comply with the Flood Damage Prevention Ordinance in the Municipal Code.	Deleted	Deletes policy - City's Flood Prevention Ordinance is not currently certified by CCC
5	148	5.10	NH-I- 26: Flood Control Maintenance	Regularly maintain flood control structures, including, but not limited to drainage channels, pipes, culverts, and stream beds.	Regularly maintain flood control structures, including, but not limited to drainage channels, pipes, and culverts.	Deletes text - Significant areas in Pacifica are serviced by creeks as critical stormwater infrastructure. - To be discussed
5	148	5.11	NH-I-27: Flood Control Structures	Require flood control devices that alter streams to incorporate best mitigation measures whenever feasible, and only permit them where no other method for protecting existing structures in the flood plain is feasible, where such protection is necessary for public safety, or to protect existing development.	Require flood control devices that alter rivers and streams to incorporate the best mitigation measures feasible, and only permit them where no other method for protecting existing structures in the flood plain is feasible, where such protection is both necessary for public safety, including for water supply, and to protect existing development, or where the primary function is the improvement of fish and wildlife habitat.	Amends policy to include rivers, water supply, and mention of fish and wildlife habitat.

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5	148	5.12	NH-I-31: Critical Facilities Location	Site critical public facilities including hospital and healthcare facilities, emergency shelters, police and fire stations, and emergency communications facilities outside of the tsunami evacuation zone, and 100-year flood plains.	Site critical public facilities including hospital and healthcare facilities, emergency shelters, police and fire stations, and emergency communications facilities outside of the tsunami evacuation zone, and 100-year flood plains, and other portions of the Coastal Vulnerability Zone over the anticipated life of the development.	Amends policy to include Coastal Vulnerability Zones.
	153	5.13	NH-I-35: Development Review	Review development proposals to ensure that they incorporate appropriate fire-mitigation measures, including adequate provisions for evacuation, access by emergency responders, and vegetation clearances that don't impact ESHAs or wetlands.	Review development proposals to ensure that they incorporate appropriate fire-mitigation measures, including adequate provisions for evacuation, access by emergency responders, and vegetation clearances that don't impact ESHAs or wetlands or their associated buffers, unless undertaken consistent with the City's ESHA and wetlands policies.	Amends policy to expand considerations of ESHA buffers
5	154	5.14	NH-I-39: Vegetation Management	Promote and support the North County Fire Authority's Vegetation Management Program to reduce urban/wildland interface fire hazards.	Promote and support the North County Fire Authority's Vegetation Management Program to reduce urban/wildland interface fire hazards, if consistent with the LCP.	Amends policy to require LCP consistency
6	156	6.1	Coastal Resilience	The purpose of this chapter is to provide policies which protect existing development from the hazard of sea level rise and which guide the design of new development to respond to sea level rise during the economic life of the project. Topics covered in this element include sea level rise projections, transfer of development rights (TDR), repair and replacement of existing shoreline protection structures	The purpose of this chapter is to provide policies which protect existing development from the hazard of sea level rise and which guide the design of new development to respond to sea level rise during the anticipated life of the project. Topics covered in this element include sea level rise projections, transfer of development rights (TDR), repair and replacement of existing shoreline protection structures	Amends text to align with new definitions. Deletes text about "protection of property rights." - To be discussed.

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				(e.g., sea walls), and establishment of appropriate site design measures for new development. Protection of property rights is an important theme in this chapter.	(e.g., sea walls), and establishment of appropriate site design measures for new development.	
6	157	6.2	Coastal Act Policies	Therefore, the policies focus on protection and armoring of the shoreline and reassessment of the adaptation plan in the future. The policies do not include managed retreat as an adaptation strategy unless and until a future Local Coastal Land Use Plan amendment and public input process culminates in supporting the strategy.	Therefore, the policies focus on protecting beaches and the natural shoreline while also allowing for protection and armoring of the shoreline for specific limited circumstances as provided for within the Coastal Act and reassessment of the adaptation plan in the future.	Coastal Act provision
6	163	6.3	Vulnerability Assessment - Pacific Institute Study	However, because the Coastal Vulnerability Zone Maps show significant erosion for areas that are protected by existing shoreline protection structures, the Maps highlight the importance of the existing structures and the vital need for them to be maintained to protect those vulnerable areas.	Deleted	Deletes text related to the City's perspective on the Vulnerability Assessment. To be discussed.
6	164	6.4	Adaptation Plan	The cost-benefit analysis section of the Adaptation Plan was not adopted or approved by the City of Pacifica. The purpose of the cost benefit analysis was to provide information regarding various sea level rise scenarios and	Deleted	Deletes a factual statement about the cost-benefit analysis not being adopted by the City. To be discussed.

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				adaptation options and was not intended to prescribe specific adaptation policies. The cost-benefit analysis shall not be used for any future purpose by the City of Pacifica or its planning processes, including implementation of the Local Coastal Program, public infrastructure investment, permitting or other regulatory purposes.		
6	166	6.4	Adaptation Plan	The findings of the Adaptation Plan are just one of the considerations that were used to develop the Coastal Resilience policies below and, as discussed, the Coastal Resilience policies focus on protection and armoring of the shoreline and reassessment of the Adaptation Plan in the future.	The findings of the Adaptation Plan are just one of the considerations that were used to develop the Coastal Resilience policies below and, as discussed, the Coastal Resilience policies focus on protection and armoring of the shoreline for specific limited circumstances as provided for within the Coastal Act and reassessment of the Adaptation Plan in the future.	Clarification
6	166	6.4	Adaptation Plan	Therefore, changes to the cost-benefit analysis in a manner to discourage managed retreat as suggested by some public commenters detailed below would be unnecessary since the Coastal Resilience policies do not include managed retreat as an adaptation strategy. As noted earlier in this section, the cost-benefit analysis prepared for the Adaptation Plan shall not be used for any future purpose by the City of Pacifica or its planning processes.	Deleted	Deletes a factual statement about the cost-benefit analysis. To be discussed.

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6	166	6.4	Adaptation Plan	The Adaptation Plan was prepared to inform City decision making about a variety of sea level rise adaptation policies, but does not include or dictate the ultimate policies selected by the City. Although managed retreat alternatives are analyzed in the Adaptation Plan in accordance with the City's grant agreement with the CCC, these analyses do not, in themselves, equate to a managed retreat policy. To the contrary, the City has rejected managed retreat as a sea level rise adaptation policy in this LCP and managed retreat could only become the policy of the City subsequent to a future amendment to the LCP.	Deleted	Deletes a factual statement about the City's consideration of managed retreat. To be discussed.
6	167	6.5	CR-I-1: Vulnerability Identification and Mapping	Notwithstanding the Coastal Vulnerability Zone Maps, site-specific hazard mapping and assessment may be required as part of the individual development review process for properties within the City's Coastal Vulnerability zones.	Notwithstanding the Coastal Vulnerability Zone Maps, site-specific hazard mapping and assessment may be required as part of the individual development review process for properties within the City's Coastal zone.	Amends policy to include Coastal Vulnerability Zones.
6	168	6.6	CR-I-2: Sea Level Rise Adaptation Plan	Adaptation alternatives evaluated in the Adaptation Plan that are not specifically expressed in these Coastal Resilience policies shall not be implemented without an amendment to the LCP, public notice, and opportunity for public input.	Deleted	Deletes text
6	168	6.6	CR-I-2: Sea Level Rise Adaptation Plan	b. All project impacts on coastal resources are mitigated to the maximum extent feasible through the City's Shoreline Mitigation Program (Coastal Resilience Policy CR-I-5) or	b. All project impacts on coastal resources are avoided, and where unavoidable, minimized and mitigated to the maximum extent consistent with Coastal Resilience Policy CR-I-59.	Amends policy to prioritize avoidance of coastal resource impacts

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				consistent with Coastal Resilience Policy CR-I-59.		
6	168	6.6	CR-I-2: Sea Level Rise Adaptation Plan	c. The project will not pose unacceptable risks to life or property or otherwise create a nuisance; and	c. The project will not pose unacceptable risks to life or property for the anticipated life of the development or otherwise create a nuisance;	Clarification to align with proposed added definition of "anticipated life"
6	168	6.6	CR-I-2: Sea Level Rise Adaptation Plan	d. The project will not encroach on public trust lands.	d. The project will not encroach on public trust lands for the anticipated life of the development; and	Clarification to align with proposed added definition of "anticipated life"
6	168	6.6	CR-I-2: Sea Level Rise Adaptation Plan	N/A	e. The project is designed to assure stability and structural integrity absent the need for shoreline protective devices.	Coastal Act provision
6	168	6.7	CR-I-3: Monitoring Shoreline Change	The monitoring program shall include yearly (minimum) shoreline and bluff edge surveys and also establish thresholds for reassessing the City's Adaptation Plan.	The monitoring program shall include biannual (minimum following winter and summer) shoreline and bluff edge surveys and also establish thresholds for reassessing the City's Adaptation Plan.	Amends policy to require additional monitoring. New direction may be too burdensome on City resources. - To be discussed
6	169	6.8	CR-I-5: Shoreline Mitigation Program	Within three years of certification of the LCP Land Use Plan update, the City shall adopt a Shoreline Mitigation Program to address the coastal resource impacts of existing and future shoreline protection projects in the City.	Within three years of certification of the LCP Land Use Plan update, the City shall adopt a Shoreline Mitigation Program to address the coastal resource impacts of existing and future shoreline protection projects in the City, and it shall be submitted to the Coastal Commission for certification as an LCP amendment.	Requires LCP amendment to incorporate shoreline mitigation program

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6	169	6.8	CR-I-5: Shoreline Mitigation Program	Until the adoption of a Shoreline Mitigation Program, coastal resource impacts shall be mitigated in accordance with CR-I-59.	Until the adoption of a Shoreline Mitigation Program by the City and subsequent certification by the Coastal Commission, coastal resource impacts shall be mitigated in accordance with CR-I-59.	Requires LCP amendment to incorporate shoreline mitigation program
6	170	6.9	CR-I-8: Critical Transportation Infrastructure	The City will pursue opportunities to preserve, protect, or relocate critical local transportation infrastructure, or provide alternative access, to mitigate against isolation and economic loss, and to ensure public safety.	The City will pursue opportunities to preserve , protect, or relocate critical local transportation infrastructure, or provide alternative access, to mitigate against isolation and economic loss, and to ensure public safety, while avoiding (and where unavoidable minimizing and mitigating) impacts to coastal resources, including public access and recreation, to the maximum extent feasible, and being consistent with prior permit conditions and/or legal obligations pursuant to the California Coastal Act.	Clarification to comply Coastal Act provision
6	170	6.10	CR-I-9: Hazard Prone Infrastructure	The City will preserve, protect, or relocate hazard prone infrastructure to maintain critical services.	The City will preserve, protect, or relocate hazard prone infrastructure to maintain critical services and protect coastal resources, including if required by prior permit conditions and/or legal obligations pursuant to the California Coastal Act.	Clarification to comply Coastal Act provision

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6	170	6.11	CR-I-15: Shoreline Protection Structures	N/A	Shoreline Protection Structures. Shoreline protection structures shall be avoided except that existing shoreline protection structures may be maintained or new shoreline protection structures constructed to protect existing structures in danger from erosion if found to be the least environmentally-damaging alternative, impacts to beach, public access and recreation, and other coastal resources are fully mitigated consistent with CR-I-5 and CR-I-59, and compliant with any prior permit conditions and/or legal obligations pursuant to the California Coastal Act . Allow shoreline protection structures for the public road and sewer line existing structures if necessary and consistent with Policies CR-I-56 and CR-I-57, other LCP policies, and the Coastal Act. New development on blufftops shall comply will all LCP setback policies, including CR-I-44.	Reorganization of Document
6	171	6.12	CR-I-16: Beach Nourishment	N/A	Beach Nourishment. Evaluate the feasibility of using beach nourishment, in conjunction with sand retention structures (see artificial headlands concept in the Adaptation Plan) as described in CR-I-55, to reduce shoreline protection structure maintenance requirements and maintain beaches of at least 100 feet in width on average. If feasible and approved through a coastal development permit, secure funding and implement as soon as possible.	Reorganization of Document



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					Repeat as necessary. Mitigate all adverse impacts and monitor effectiveness over time.	
6	171	6.13	Sub-area Policies and Programs	Where applicable, the titles of the policies in this subsection detail when the policy should be implemented. For example, CR-I-15 Shoreline Protection Structures (0-1 foot SLR or 260-foot offset from bluff toe to infrastructure) should be implemented when 0 to 1 foot of sea level rise or a 260-foot bluff offset is experienced. The bluff offset is measured distance between the edge of the bluffs and the asset (e.g., infrastructure, development). These triggers do not account for regulatory permitting, approvals, or financing; therefore planning should be done in advance of the triggers.	Deleted	Reorganization of Document
6	171	6.13	Sub-area Policies and Programs	Generally, for all lands within the 2050 Pacific Institute erosion hazard zone, utilities, roadways and other public infrastructure should be floodproofed unless other adaptation alternatives are implemented and performing well.	Generally, for all lands within the Coastal Vulnerability zones, utilities, roadways and other public infrastructure should be floodproofed unless other adaptation alternatives are implemented and performing well, and only if consistent with LCP and Coastal Act policies.	Amends text to use Coastal Vulnerability Zones

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6	172	6.13	Sub-area Policies and Programs	In addition, the City should, when appropriate, evaluate and pursue floodproofing infrastructure that may be currently exposed to coastal erosion and flooding to reduce the consequences of under-performance of protection measures (CR-I-61).	In addition, the City should, when appropriate, evaluate and pursue floodproofing infrastructure that may be currently exposed to coastal erosion and flooding to reduce the consequences of under-performance of protection measures, only if such floodproofing infrastructure is the least environmentally damaging feasible alternative and consistent with LCP and Coastal Act policies (CR-I-61).	Coastal Act provision
6	172	6.13	Sub-area Policies and Programs	The City's overall approach for new development is to minimize or avoid current and projected future coastal hazards through siting and design. At the same time, managed retreat is not included in any of the near-term policies. Managed retreat would be reconsidered if feasibility and monitoring warranted, as detailed in Coastal Resilience Policies CR-I-3 and CR-I-4.	The City's overall approach to address coastal hazards is through siting and design of new development to be out of harm's way and to limit shoreline armoring as much as possible, including to help preserve and protect the City's shoreline and beaches.	Amends text related to managed retreat. To be discussed.
6	173	6.14	CR-I-15: Shoreline Protection Structures (0-1foot SLR or 260 foot offset from bluff toe to infrastructure)	Shoreline Protection Structures (0-1 foot SLR or 260-foot offset from bluff toe to infrastructure). Shoreline protection structures shall be avoided except that the existing shoreline protection structures may be maintained or new shoreline protection structures constructed to protect existing structures in danger from erosion if found to be the least environmentally-damaging alternative, impacts are fully mitigated consistent with CR-I-5, and compliant with any prior permit conditions and/or legal	Deleted	Reorganization of Document

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				<p>obligations pursuant to the California Coastal Act . Allow shoreline protection structures for the public road and sewer line existing structures if necessary and consistent with Policies CR-I-56 and CR-I-57, other LCP policies, and the Coastal Act. New development on blufftops shall comply will all LCP setback policies, including CR-I-44.</p>		
6	173	6.15	CR-I-16: Beach Nourishment (2 feet SLR or 260-foot offset from bluff toe to infrastructure).	<p>Beach Nourishment (2 feet SLR or 260-foot offset from bluff toe to infrastructure). Evaluate the feasibility of using beach nourishment, in conjunction with sand retention structures (see artificial headlands concept in the Adaptation Plan) as described in CR-I-55, to reduce shoreline protection structure maintenance requirements and maintain beaches of at least 100 feet in width on average. If feasible and approved through a coastal development permit, secure funding and implement as soon as possible. Repeat as necessary. Mitigate all adverse impacts and monitor effectiveness over time.</p>	Deleted	Reorganization of Document

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6	174	6.16	CR-I-18: Shoreline Protection Structures (0-1 foot SLR or 220-foot offset from bluff toe to infrastructure or development)	Shoreline Protection Structures (0-1 foot SLR or 220-foot offset from bluff toe to infrastructure or development). Maintain existing or construct new shoreline protection structures to protect existing public infrastructure structures, including between Bill Drake Way and Manor Drive. Allow private property owners to maintain existing or construct new shoreline protection structures if allowed pursuant to Policies CR-I-56 and CR-I-57, and if consistent with prior permit conditions and/or legal obligations pursuant to the California Coastal Act, and require mitigation of beach, public access and recreation and other coastal resource impacts, consistent with CR-I-5 or CR-I-59, as necessary.	Deleted	Reorganization of Document
6	174	6.17	CR-I-19: Beach Nourishment (0-1 foot SLR or 220-foot offset from bluff toe to infrastructure or development)	Beach Nourishment (0-1 foot SLR or 220-foot offset from bluff toe to infrastructure or development). Evaluate the feasibility of using beach nourishment, in conjunction with sand retention structures (artificial headlands concept) as described in CR-I-55, to reduce shoreline protection structure maintenance requirements and maintain beaches of at least 100 feet in width on average. If feasible and approved through a coastal development permit, secure funding and implement as soon as possible. Mitigate all adverse impacts and monitor effectiveness over time.	Deleted	Reorganization of Document

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6	175	6.18	CR-I-20: Shoreline Protection Structures (0-1 feet SLR or 70-foot offset from bluff toe to development or infrastructure).	Shoreline Protection Structures (0-1 feet SLR or 70-foot offset from bluff toe to development or infrastructure). Private landowners may maintain, expand, or construct new shoreline protection structures to protect existing structures in danger from erosion, consistent with CR-I-2 and any prior permit conditions and/or legal obligations pursuant to the California Coastal Act.	Deleted	Reorganization of Document
6	175	6.19	CR-I-21: Beach Nourishment (0-2 feet SLR or 70-foot offset from bluff toe to development or infrastructure).	Beach Nourishment (0-2 feet SLR or 70-foot offset from bluff toe to development or infrastructure). Evaluate the feasibility of using beach nourishment, in conjunction with sand retention structures (artificial headlands concept), to reduce shoreline protection structure maintenance requirements and maintain beaches of at least 100 feet in width on average. If feasible and approved through a coastal development permit, secure funding and implement as soon as possible. Repeat as necessary. Mitigate all adverse impacts and monitor effectiveness over time.	Deleted	Reorganization of Document
6	175	6.20	CR-I-22: Flood Protection (1 feet SLR)	Flood Protection (1 feet SLR). Enable property owners to modify development structures (e.g., elevate a residence) to manage impacts of wave run-up and overtopping of bluff face.	Flood Protection. Enable property owners to modify development structures to manage impacts of wave run-up and overtopping of bluff face provided such modifications are consistent with the LCP and any prior permit conditions and/or legal	Generalize policy

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					obligations pursuant to the California Coastal Act.	
6	177	6.21	CR-I-23: Sharp Park Golf Course	Sharp Park Golf Course. Strongly support the City and County of San Francisco's maintenance of the Sharp Park Golf Course berm and armoring, consistent with the Coastal Development Permit issued by the California Coastal Commission, including adaptation planning for the course, and protecting public access. The City of Pacifica shall strongly support the City and County of San Francisco's ongoing maintenance of the berm even if Coastal Commission termination of authorization is triggered by the conditions of approval, or require construction of flood protection improvements by the City and County of San Francisco.	Deleted	Deletes policy text. To be discussed.
6	177	6.22	CR-I-24: Shoreline Protection Structures (0 feet SLR)	Shoreline Protection Structures (0 feet SLR). Maintain existing or construct shoreline protection structures to protect existing public infrastructure structures if consistent with Policies CR-I-56 and CR-I-57. Extend the Beach Boulevard seawall to the Sharp Park Golf Course berm if consistent with Policies CR-I-56 and CR-I-57.	Deleted	Reorganization of Document

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6	177	6.23	CR-I-25: Structure Elevation (0-2 feet SLR)	Maintain existing or construct shoreline protection structures if consistent with Policies CR-I-56 and CR-I-57 to limit wave overtopping unless beach nourishment strategies are effective in reducing wave run-up on the backshore. Elevate development structures if consistent with Policy CR-I-61 as necessary to mitigate flood damage, consistent with height limitations. Elevations of wave run-up and associated development thresholds shall be determined via a site-specific study.	Maintain existing or construct shoreline protection structures if consistent with Policies CR-I-56 and CR-I-57, and with any prior permit conditions and/or legal obligations pursuant to the California Coastal Act to limit wave overtopping unless beach nourishment strategies are effective in reducing wave run-up on the backshore. Elevate development structures if consistent with Policy CR-I-61, and with any prior permit conditions and/or legal obligations pursuant to the California Coastal Act as necessary to mitigate flood damage, consistent with height limitations, determined via a site-specific study.	Clarification to comply with Coastal Act provision. - To be discussed
6	177	6.24	CR-I-26: Beach Nourishment (0-1 feet SLR)	Beach Nourishment (0-1 feet SLR). Pursue beach nourishment and sand retention structures to reduce shoreline protection structure maintenance requirements and provide beach resources. Encourage the City and County of San Francisco to nourish the beach fronting the Sharp Park Golf Course berm to maintain beach widths.	Deleted	Reorganization of Document
6	177	6.25	CR-I-27: Flood Protection (0 foot SLR)	(0 foot SLR).	Deleted	Generalize policy
6	178	6.26	CR-I-28: Flood Protection (3 feet SLR).	(3 feet SLR).	Deleted	Generalize policy

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6	178	6.27	CR-I-29: Shoreline Protection Structure Shoreline Protection Structures (0 feet SLR).	Shoreline Protection Structure Shoreline Protection Structures (0 feet SLR). Maintain existing or construct new shoreline protection structures along the north cove for public safety and hazard reduction if consistent with Policies CR-I-56 and CR-I-57.	Deleted	Reorganization of Document
6	178	6.28	CR-I-30: Shoreline Protection (2-3 feet SLR, or when backshore toe is 100 feet from Highway 1).	(2-3 feet SLR, or when backshore toe is 100 feet from Highway 1).	Deleted	Generalize policy
6	178	6.29	CR-I-31: Public Access (0 feet SLR).	(0 feet SLR).	Deleted	Generalize policy
6	178	6.30	CR-I-32: Beach Nourishment/ Public Access (0 feet SLR).	Beach Nourishment/Public Access (0 feet SLR). Plan and implement beach nourishment for Rockaway Beach. Monitor and measure performance and any reduction of shoreline protection structure maintenance needs. Establish mechanisms through the City's Shoreline Mitigation Program (CR-I-5) to receive and use beach impact mitigation funds from other sub-areas of the City.	Deleted	Reorganization of Document



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6	180	6.31	CR-I-35: Shoreline Protection (2 ft SLR or 100 foot offset from shoreline to infrastructure).	Shoreline Protection (2 ft SLR or 100 foot offset from shoreline to infrastructure). Evaluate beach conditions and consider future shoreline protection to protect existing parking structures and the existing Linda Mar stormwater and wastewater pump station structures as necessary.	Deleted	Reorganization of Document
6	180	6.32	CR-I-37: Beach Nourishment (2 ft SLR or 100 foot offset from shoreline to infrastructure).	Beach Nourishment (2 ft SLR or 100 foot offset from shoreline to infrastructure). Evaluate beach conditions and implement beach nourishment as necessary to maintain a 100-foot buffer seaward of the sewer force main and/or Highway 1. Repeat nourishments as needed.	Deleted	Reorganization of Document
6	180	6.33	CR-I-38: Flood Protection (0 feet SLR).	(0 feet SLR).	Deleted	Generalize policy
6	180	6.34	CR-I-39: Flood Protection (2 feet SLR or 100-foot offset from shoreline to infrastructure).	(2 feet SLR or 100-foot offset from shoreline to infrastructure).	Deleted	Generalize policy
6	180	6.35	CR-I-40: Groundwater Management (0-2 feet SLR).	(0-2 feet SLR).	Deleted	Generalize policy

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6	181	6.36	CR-I-41: Shoreline Protection Structure Upgrades.	Shoreline Protection Structure Upgrades. Allow maintenance of existing or new shoreline protection structures to reduce hazards and resource impacts if consistent with Policies CR-I-56 and CR-I-57. Mitigate impacts consistent with the City's Shoreline Mitigation Program (CR-I-5), or CR-I-59, as necessary.	Deleted	Reorganization of Document
6	181	6.37	CR-I-42: Flood Protection (0-1 feet SLR).	(0-1 feet SLR).	Deleted	Generalize policy
6	181	6.38	CR-I-43: Technical Reports.	Development proposed on the shoreline shall include coastal engineering, geomorphology and other relevant technical reports unless on-site hazards already identified in a recent Coastal Vulnerability Zone Map or assessment approved within the last five years are adequate for evaluating and ensuring compliance with the LCP, including through use of permit conditions to address any uncertainty.	Development proposed in Coastal Vulnerability Zones shall include coastal engineering, geomorphology and other relevant technical reports unless on-site hazards already identified in a recent Coastal Vulnerability Zone Map or assessment approved within the last five years are adequate for evaluating and ensuring compliance with the LCP, including through use of permit conditions to address any uncertainty.	Applicability to Coastal Vulnerability Zones
6	181	6.38	CR-I-43: Technical Reports.	<ul style="list-style-type: none"> <li>consider the impacts from the med-high projection (CaINRA &amp; OPC 2018) of sea-level rise for the anticipated duration of the proposed development;</li> </ul>	<ul style="list-style-type: none"> <li>consider the impacts from the med-high projection (CaINRA &amp; OPC 2018; or similar precautionary projections as reflected in future updated statewide guidance) of sea-level rise for the anticipated life of the proposed development;</li> </ul>	Reflects that best available science may change over time.
6	181	6.38	CR-I-43: Technical Reports.	<ul style="list-style-type: none"> <li>demonstrate that the development will avoid (or if unavoidable, minimize) impacts from coastal hazards to the maximum extent feasible; and</li> </ul>	<ul style="list-style-type: none"> <li>demonstrate that the development will avoid (or if unavoidable, minimize) impacts from coastal hazards for the anticipated life of the proposed development without reliance on any</li> </ul>	Amended policy may impact Pacifica's dense development pattern - To be discussed

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					existing or future shoreline protection devices;	
6	181	6.38	CR-I-43: Technical Reports.	N/A	<ul style="list-style-type: none"> <li>demonstrate that the factor of safety for blufftop development will be greater than or equal to 1.5 for static conditions and greater than or equal to 1.1 for seismic conditions; and</li> </ul>	Clarification
6	181	6.39	CR-I-44: Siting and Design.	New development on vacant shoreline property shall be sited and designed to be safe from erosion, bluff failure, wave run-up, flooding and other coastal hazards for at least 100 years without shoreline protection, considering projected sea level rise and other climate change effects to be determined from best available science and current guidance at the time of approval of the proposed development, as demonstrated by site-specific analyses and/or technical reports. Permit approvals shall prohibit shoreline protection structures for the authorized development, require the property owner to record an acknowledgement that the development does not qualify as an existing structure entitled to construction of a shoreline protection structure under Coastal Act Section 30235 and a waiver of any rights to such protection, and where necessary require a removal and restoration plan, including bonding for large projects, to	New development in Coastal Vulnerability Zones shall be sited and designed to be safe from erosion, bluff failure, wave run-up, flooding and other coastal hazards for at least 100 years without shoreline protection, considering projected sea level rise and other climate change effects to be determined from best available science and current guidance at the time of approval of the proposed development, as demonstrated by site-specific analyses and/or technical reports. Permit approvals shall prohibit shoreline protection structures for the authorized development, require the property owner to record an acknowledgement that the development does not qualify as an existing structure entitled to construction of a shoreline protection structure under Coastal Act Section 30235, and any other laws, that waive any rights to such protection structures that might exist, and that, where necessary, requires a removal and restoration plan, including bonding for	Applicability to Coastal Vulnerability Zones

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				avoid future shoreline protection structures or project failure.	large projects, to avoid future shoreline protection structures or project failure.	
6	182	6.40	CR-I-45: Assumption of Risk by Private Landowners.	Permit approvals of development on the shoreline shall require the applicant to: record a deed restriction requiring the owner to assume liability and indemnify and hold the City harmless, and make other acknowledgments relating to the risks of development on the property.	Permit approvals of development in Coastal Vulnerability Zones and Tsunami Evacuation Zones shall require the applicant to: record a deed restriction requiring the owner to assume liability and indemnify and hold the City, its officers, agents, and employees harmless, including any injury and/or damage from coastal hazards in connection with the permitted development; unconditionally waive any claim of damage from coastal hazards against the City; waive rights to future shoreline armoring; acknowledge the development may need to be removed and the site restored in response to future hazard conditions; and to assume all responsibility for any adverse effects to property caused by the permitted project and/or need for removal or relocation of development.	Applicability to Coastal Vulnerability Zones. - To be discussed

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6	183	6.41	CR-I-49: Substantial Modifications to Existing Structures.	Substantial Modifications to Existing Structures. When a proposed physical improvement to an existing structure would constitute a Substantial Exterior Structural Modification (SESM), as defined, the portion of the project constituting a SESM shall be undertaken consistent with the LCP and, if applicable, the Coastal Act, including but not limited to Policies CR-I-43 and CR-I-44. Any portion of the existing structure that remains and which is determined to be legally nonconforming with an LCP standard, including bluff setbacks or other hazard criteria, shall not be modified to increase the degree of nonconformity.	Substantial Structural Modifications. When proposed modifications to an existing structure constitute a Substantial Structural Modification (SSM), as defined, such proposed development shall correct any existing legal nonconformities and shall be undertaken consistent with the LCP and the Coastal Act, including but not limited to Policies CR-I-43 and CR-I-44.	Amended to exclude Existing Structures and address existing legal nonconformities - To be discussed
6	183	6.42	CR-I-51: Habitat Sea Level Rise Migration Buffers.	A sea level rise buffer area shall be added to require new development habitat buffers if necessary to allow for the migration of wetlands and other coastal habitats caused by sea level rise over the anticipated duration (i.e., economic life) of the development. Habitats include all wetlands, riparian, intertidal/shoreline and terrestrial environmentally sensitive habitat areas (ESHAs) as defined by the Coastal Act. The sea level rise projection considered shall be determined for the type of development from CalNRA and OPC (2018) guidance or the latest update.	An additional sea level rise buffer area shall be added to required habitat buffers if necessary to allow for the migration of wetlands and other coastal habitats caused by sea level rise over the anticipated life of the development. Habitats include all wetlands, riparian, intertidal/shoreline and terrestrial environmentally sensitive habitat areas (ESHAs) as defined by the Coastal Act. The sea level rise projection considered shall be determined based on the type of development and current State guidance.	Clarification to require compliance with State guidance. - To be discussed
6	184	6.43	CR-I-55: Beach Nourishment	In coordination with the California Coastal Commission and other permitting agencies (e.g., State Lands	In coordination with the California Coastal Commission and other permitting agencies (e.g., State Lands	Clarification that Coastal Act compliance is required. - To be discussed

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				<p>Commission, U.S. Army Corps of Engineers), the City shall evaluate a beach nourishment program in conjunction with sand retention structures to assist in maintaining beach width and elevations, consistent with sub-area policies. The beach nourishment program will include measures to protect water quality and to avoid (and where unavoidable to minimize and mitigate) potential adverse coastal resource impacts, including biological resource impacts, from deposition of material, including measures such as sand compatibility specifications, restrictions on volume of deposition, timing or seasonal restrictions, and identification of environmentally preferred locations for deposits.</p>	<p>Commission, U.S. Army Corps of Engineers), the City shall evaluate a beach nourishment program in conjunction with sand retention structures to assist in maintaining beach width and elevations, consistent with sub-area policies and the Coastal Act. The beach nourishment program will need to be evaluated to be the least environmentally damaging feasible alternative and will include measures to protect water quality and to avoid (and where unavoidable to minimize and mitigate) potential adverse coastal resource impacts, including biological resource impacts, from deposition of material, including measures such as sand compatibility specifications, restrictions on volume of deposition, timing or seasonal restrictions, and identification of environmentally preferred locations for deposits.</p>	
6	185	6.44	CR-I-56: Existing Shoreline Protection Structures	<p>Except as may be otherwise provided in the LCP sub-area policies, legally permitted shoreline protection structures may be repaired and maintained, as supported by Section 30235 of the Coastal Act, subject to all coastal development permit requirements (including those associated with the construction of the structure and/or prior repair and maintenance episodes) until the development they are protecting is removed or no longer requires</p>	<p>Except as may be otherwise provided in the LCP sub-area policies, legally permitted shoreline protection structures may be repaired and maintained, as supported by Section 30235 of the Coastal Act, subject to all coastal development permit requirements (including those associated with the construction of the structure and/or prior repair and maintenance episodes) until the development they are protecting is removed or redeveloped pursuant to</p>	<p>Policy as amended that could impact Pacifica's dense development pattern - To be discussed</p>

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				<p>shoreline protection structures, at which time the shoreline protection structure shall be reevaluated for consistency with the LCP, and removed if no longer necessary. Activities considered "repair and maintenance" shall not result in any enlargement or extension of the shoreline protection structure, or any seaward encroachment or impairment of public trust resources, and shall provide mitigation for any new coastal resource impacts not previously or otherwise mitigated, including through the City's Shoreline Mitigation Program (CR-I-5) and/or Policy CR-I-59.</p>	<p>the definition of a Substantial Structural Modification (SSM) or no longer requires shoreline protection structures, at which time the shoreline protection structure shall be reevaluated for consistency with the LCP removed if no longer necessary and/or allowed, and the area restored. Activities considered "repair and maintenance" shall not result in any enlargement or modification to the shoreline protection structure, or any replacement of materials in excess of 50%, or any seaward encroachment or impairment of public trust resources, and shall provide mitigation for any new coastal resource impacts not previously or otherwise mitigated, including through the City's Shoreline Mitigation Program (CR-I-5) and/or Policy CR-I-59.</p>	
6	185	6.44	CR-I-56: Existing Shoreline Protection Structures	<p>Other modifications to existing shoreline protection structures which fall within the limitations of an exclusion contained in the definition of Substantial Exterior Structural Modification shall be considered to be an existing shoreline protection structure. This policy shall not be applied to justify the removal of a shoreline protection structure which protects any structure authorized to be constructed pursuant to an exclusion contained in the definition of Substantial Exterior Structural Modification.</p>	Deleted	Deletes portion of policy that could impact Pacifica's dense development pattern - To be discussed

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6	185	6.45	CR-I-57: New Shoreline Protection Structures	Shoreline protection structures, including revetments, breakwaters, groins, seawalls, cliff retaining walls, deep piers and caissons, and other such construction that alters natural shoreline processes shall only be permitted consistent Section 30235 of the Coastal Act and with the LCP's sub-area policies only when required to serve coastal-dependent uses or protect existing structures or public beaches in danger from erosion, when designed to eliminate or mitigate adverse impacts on local shoreline sand supply.	Shoreline protection structures, including revetments, breakwaters, groins, seawalls, cliff retaining walls, deep piers and caissons, and other such construction that alters natural shoreline processes shall only be permitted if consistent Section 30235 of the Coastal Act and with the LCP's sub-area policies, and only when required to serve coastal-dependent uses or protect existing structures or public beaches in danger from erosion, when there is no less environmentally damaging feasible alternative and when designed to avoid, and where unavoidable, minimize to the maximum extent feasible adverse impacts on local shoreline sand supply and other coastal resources, where unavoidable coastal resource impacts are required to be commensurately mitigated.	Amends policy to address unavoidable feasible alternative or coastal impacts. - To be discussed
6	185	6.46	CR-I-58: Authorization Limits of Shoreline Protection Structures	Shoreline protection structures shall only be authorized until the time when the existing structure protected by such shoreline protection structure: 1) is/are no longer present, or 2) no longer require(s) armoring. This policy shall not be applied to justify the removal of a shoreline protection structure which protects any structure authorized to be constructed pursuant to an exclusion contained in the definition of Substantial Exterior Structural Modification.	Shoreline protection structures shall only be authorized until the time when the structure protected by such shoreline protection structure: 1) is/are no longer present, 2) no longer require(s) armoring, or 3) is redeveloped pursuant to the definition of a Substantial Structural Modification (SSM).	Amends policy that could impact Pacifica's dense development pattern - To be discussed



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Glossary	215	7.1	Anticipated Life	N/A	The period over which a development is expected to be usable, with normal repairs and maintenance, for the purpose for which it was designed, typically a minimum of 75-100 years for residential and commercial development and a minimum of 100-150 years for critical infrastructure.	New text from CCC's adopted guidance for residential development and critical infrastructure. - To be discussed
Glossary	215	7.2	Beach	: The expanse of sand, gravel, cobble or other loose material that extends landward from the mean low water line to the place where there is distinguishable change in physiographic form, or to the line of permanent vegetation. The seaward limit of a beach (unless specified otherwise) is the mean low water line.	: The expanse of sand, gravel, cobble or other loose material that extends landward from the mean low water line to the place where there is distinguishable change in physiographic form, or to the line of permanent vegetation. The seaward limit of a beach (unless specified otherwise) is the mean low water line. The inland extent of the beach shall be determined as follows:  1) From a distinct linear feature (e.g., a seawall, road, or bluff, etc.);  2) From the inland edge of the further inland beach berm as determined from historical surveys, aerial photographs, and other records or geological evidence; or  3) Where a beach berm does not exist, from the further point separating the dynamic portion of the beach from the inland area as distinguished by vegetation, debris or other geological or historical evidence.	Amends text to be consistent with Coastal Act

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Glossary	216	7.3	Bluff	A high bank or bold headland with a broad, precipitous, sometimes rounded cliff face overlooking a plain or body of water.	Deleted	Deletes text to eliminate redundancy
Glossary	216	7.4	Coastal Hazards	N/A	Include but are not limited to episodic and long-term shoreline retreat and coastal erosion, high seas, ocean waves, storms, tsunamis, tidal scour, wave overtopping, coastal flooding, and their interaction, all of which may be exacerbated by sea level rise.	Clarification
Glossary	217	7.5	Development	On land, in or under water, the placement or erection of any solid material or structure; discharge or disposal of any dredged material or of any gaseous, liquid, solid, or thermal waste; grading, removing, dredging, mining, or extraction of any materials; change in the density or intensity of use of land, including, but not limited to, subdivision pursuant to the Subdivision Map Act (commencing with Section 66410 of the Government Code), and any other division of land, including lot splits, except where the land division is brought about in connection with the purchase of such land by a public agency for public recreational use; change in the intensity of use of water, or of access thereto; construction, reconstruction, demolition, or alteration of the size of any structure, including any facility of any private, public, or municipal utility; and the removal or harvesting of major vegetation other than for agricultural	On land, in or under water, the placement or erection of any solid material or structure; discharge or disposal of any dredged material or of any gaseous, liquid, solid, or thermal waste; grading, removing, dredging, mining, or extraction of any materials; change in the density or intensity of use of land, including, but not limited to, subdivision pursuant to the Subdivision Map Act (commencing with Section 66410 of the Government Code), and any other division of land, including lot splits, except where the land division is brought about in connection with the purchase of such land by a public agency for public recreational use; change in the intensity of use of water, or of access thereto; construction, reconstruction, demolition, or alteration of the size of any structure, including any facility of any private, public, or municipal utility; and the removal or harvesting of major vegetation other than for agricultural	New text to clarify terms used in document

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				<p>purposes, kelp harvesting, and timber operations which are in accordance with a timber harvesting plan submitted pursuant to the provisions of the Z'berg-Nejedly Forest Practice Act of 1973 (commencing with Section 4511).</p> <p>As used in this section, "structure" includes, but is not limited to, any building, road, pipe, flume, conduit, siphon, aqueduct, telephone line, and electrical power transmission and distribution line.</p>	<p>purposes, kelp harvesting, and timber operations which are in accordance with a timber harvesting plan submitted pursuant to the provisions of the Z'berg-Nejedly Forest Practice Act of 1973 (commencing with Section 4511).</p> <p>As used in this section, "structure" includes, but is not limited to, any building, road, pipe, flume, conduit, siphon, aqueduct, telephone line, and electrical power transmission and distribution line. In this LCP, 'development' is synonymous with 'new development.'</p>	
Glossary	218	7.6	Environmental Justice	The fair treatment of people of all races, cultures, and incomes with respect to the development, adoption, implementation, and enforcement of environmental laws, regulations, and policies	The fair treatment and meaningful involvement of people of all races, cultures, and incomes with respect to the development, adoption, implementation, and enforcement of environmental laws, regulations, and policies	Clarification
Glossary	218	7.7	Existing Structure	<p>A structure that has any of the following characteristics:</p> <p>i) lawfully constructed prior to the certification date of the LCLUP; or</p> <p>ii) permitted for construction prior to the certification date of the LCLUP, and all permits remained in full force and effect prior to the date of construction; or</p>	Deleted	Deletes text to be consistent with CCC guidance

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				iii) authorized to be constructed pursuant to an exclusion contained in the definition of Substantial Exterior Structural Modification.”		
Glossary	220	7.8	New Development	Development, as defined in Section 30106 of the California Coastal Act, where no existing development occurs. New Development does not include the remodeling or improvement of an existing structure, as defined, and also does not include any structure authorized to be constructed pursuant to an exclusion contained in the definition of Substantial Exterior Structural Modification.”.	Deleted	Deletes text to clarify terms used in document - To be discussed
Glossary	222	7.9	Shoreline	Intersection of the ocean or sea with land; the line delineating the shoreline on National Ocean Service nautical charts and surveys approximates the mean low water line from the time the chart was prepared.	Seaward of the base of coastal bluffs and/or at or near the sandy beach/ocean elevation, including as depicted in Appendix B (“Coastal Zone Vulnerability Maps”) and denoted as “wave run-up,” “storm flood area,” and “flood prone area.”	Clarification to be consistent with CCC guidance
Glossary	222	7.10	Substantial Exterior Structural Modification (SESM)	Any physical improvement which modifies an existing structure, as defined, to achieve in any of the following:  i) a seaward encroachment of the structure; or  ii) removal or replacement of 50	Any physical improvement which modifies an existing structure in any of the following:  i) alteration, removal or replacement of 50 percent or more of the linear length of the exterior walls, or other major structural components (including but not limited to floor, roof,	Amends text to be consistent with CCC SLR guidance. Amendment may impact Pacifica's dense urban development - To be discussed

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				<p>percent or more of the linear length of the exterior walls, whether or not the floor area or building footprint is expanded; or</p> <p>iii) an addition that includes new floor area at or below the first story equal to 50 percent or more of the structure's total existing floor area; or</p> <p>iv) an increase of the existing building footprint equal to 50 percent or more;</p> <p>but excluding any of the following:</p> <p>i) removal, replacement, or maintenance of nonstructural exterior components of exterior walls such as decorative siding, shingles, and roofing materials and windows;</p> <p>ii) development on any site which is protected from coastal erosion by an existing, permitted shore- line protection structure;</p> <p>iii) replacement of any structure pursuant to the provisions of subdivision (g) of Section 30610 of the Public Resources Code;</p> <p>iv) the demolition and reconstruction of a single-family residence; provided, that the reconstructed residence shall not exceed either the floor area, height or bulk of the former structure by</p>	<p>and foundation structures), whether or not the floor area or building footprint is expanded; or</p> <p>ii) an addition that includes new floor area equal to 50 percent or more of the structure's total existing floor area; or</p> <p>iii) an increase of the existing building footprint equal to 50 percent or more;</p> <p>but excluding removal, replacement, or maintenance of nonstructural exterior components such as decorative siding, shingles, and windows.</p> <p>Incremental changes that cumulatively amount to replacement of 50 percent of more over time shall also be considered a SSM.</p>	

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				<p>more than 10 percent, and that the reconstructed residence shall be sited in the same location on the affected property as the former structure; or</p> <p>v) the reconstruction, repair, or maintenance of any shoreline protection structure; provided, however, that the reconstructed, repaired, or maintained shoreline protection structure is not seaward of the location of the former structure, and that such modifications do not increase the height or length of the former shoreline protection structure by more than 10 percent.</p> <p>Changes to exterior walls, floor area, height, length, or building footprint shall be measured cumulatively from those existing at the site on the date of certification of the LCLUP. The cost of improvements shall not be used as a basis in application of this definition or any policy relying thereupon unless expressly stated in the policy. Incremental changes that cumulatively amount to replacement of 50 percent or more over time shall also be considered a SSM.</p>		