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Congress of the United States  
House of Representatives  
Washington, DC 20515-0514

COMMITTEE ON ARMED SERVICES  
SUBCOMMITTEES:  
RANKING MEMBER, OVERSIGHT AND  
INVESTIGATION  
MILITARY PERSONNEL  
PERMANENT SELECT COMMITTEE  
ON INTELLIGENCE  
SUBCOMMITTEES:  
EMERGING THREATS  
NSA AND CYBERSECURITY  
Senior Whip

February 12, 2016

Coastal Sediment Management Workgroup  
Suzan M. Ming, Project Manager  
U.S. Army Corps of Engineers  
911 Wilshire Blvd.  
Los Angeles, CA. 90017

Clifton Davenport, Project Manager  
California Geological Survey  
135 Ridgeway  
Santa Rosa, CA. 95401

Dear Coastal Sediment Management Working Group:

I write to express my opposition to proposals to abandon or prohibit the maintenance of the sea wall at Sharp Park golf course in Pacifica. Proposals like this continue a series of thinly-veiled and ideologically-motivated attacks, all unsuccessful in the courts, against the golf course, the wetlands protecting endangered and threatened species, and the nearby residential neighborhood.

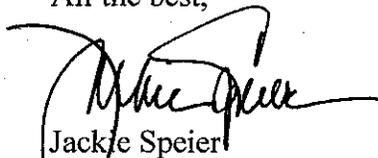
In the opinion of some, the golf course, and by extension the wetlands and the neighborhood, are anachronisms that must be swallowed by the sea because nothing can be defended against the onslaught of the Pacific Ocean. I strongly believe that human action is the leading cause of global climate change, and that we must take actions to control and reduce emissions. Coastal erosion related to climate change obviously exists. For the past several years, I've organized several public forums drawing hundreds of citizens to discuss sea level rise so that we may come to a community consensus about how to deal with this phenomenon. It is obvious that in some instances it may even be beneficial for all concerned to let a portion of existing land be submerged.

Nonetheless, these decisions are serious ones that often involve complex regulatory and budgetary actions. These decisions *should not be complicated or exacerbated in their complexity* by a sediment management plan which effectively prohibits federal, state or local action at this point. Under legal permits granted to San Francisco, the sea wall needs to be maintained and the endangered and threatened species behind the sea wall defended by San Francisco. The federal government and the people of San Francisco and San Mateo counties expect this maintenance to

happen, a point affirmed through successful litigation. To then purposely prohibit state and federal financial or regulatory participation because a sediment management plan favors that outcome would be to abandon public dialogue about choices and the public's interest in that dialogue. In my judgment the only clearly foreseeable outcome from adopting the proposed recommendations to bar or to limit maintenance would be to cause the degradation of the structure, which may sharply increase the risk of catastrophic loss during unpredictable storms.

In sum, I strongly advise the workgroup to set aside any policy that pre-ordains a lack of maintenance or the intentional abandonment of this sea wall or that precludes directly or by implication any federal or state participation in maintenance.

All the best,



Jackie Speier

KJS/bp

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14TH DISTRICT, CALIFORNIA

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February 17, 2016

Coastal Sediment Management Workgroup  
Suzan M. Ming, Project Manager  
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911 Wilshire Blvd.  
Los Angeles, CA. 90017

Clifton Davenport, Project Manager  
California Geological Survey  
135 Ridgeway  
Santa Rosa, CA. 95401

Dear Coastal Sediment Management Working Group:

In addition to my earlier comments specifically about the sea wall near the golf course, I wish to clarify another matter.

Pacifica's entire shoreline faces enormous challenges. There are some who believe that efforts to maintain property, public infrastructure or recreational amenities along this shoreline are doomed and foolish. I strongly disagree.

Second, there are many complex actions happening along the shoreline, a limited number of which are capable of being modeled scientifically. Most importantly from the public's perspective, there are responsible agencies and private property owners working to deal with the situation of shoreline erosion. These agencies are also trying to develop efforts that have the broadest public support because despite the beliefs of some that public policy choices arise with ease or through sterile logic, they are actually the consequence of difficult dialogue that needs a broad pallet of options to be successful.

If the recommendations of your workgroup, as a practical matter, would lead to the limitation or elimination of federal, state or local participation in technically feasible choices to retain existing infrastructure, property and amenities, I believe that the working group will destroy the public's trust in your work product. I also believe that the work product will become a severe impediment to those who actually bear responsibility to the electorate to create choices for the future.

I strongly advise you to be expansive in your recommendations, and to include meaningful options to protect property, public assets and visitor amenities.

All the best,



Jackie Speier

KJS/bp

# ***DON HORSLEY***

Board of Supervisors, Third District  
County of San Mateo

Feb. 16, 2016

Kearns & West, ATTN: Julia Golomb  
475 Sansome Street, Suite 570  
San Francisco, CA 94111  
jgolomb@kearnswest.com

## Comments from Supervisor Don Horsley – Third District

The complexity of planning for future sea level rise and, specifically, beach and cliff erosion along the San Mateo County coast, is gaining more public and governmental scrutiny.

The draft San Francisco Cell Coastal Regional Sediment Management Plan outlines a comprehensive analysis of a decades-long future that has been highlighted by the collapse of bluffs during the 2016 El Nino storms.

During public meetings, the emphasis on the future has been about making long-term governance decisions grappling with what should be done and what rules and regulations need to be crafted. While it does not advocate “managed retreat,” that concept is part of the draft plan.

Currently, the governance for the San Mateo County coast, which includes Pacifica, is the use of emergency measures to protect private property, whenever possible. The recent history in Pacifica clearly indicates that an emergency collapse of public and even private coastal property creates the possibility of emergency permits from the California Coastal Commission to protect and preserve property.

As the Supervisor for District 3, which incorporates the entire San Mateo County coastline, I have been working diligently to protect for the immediate future, such assets as Highway 1 at Surfer’s Beach, the collapsing danger at Mirada Road and various other areas of imminent danger. In the City of Pacifica, which has also been working to protect private property whenever there is a dangerous collapse, the present governance is similar: protect property as long as it is possible to do so.

While a catastrophic disaster, such as a house or apartment building falling from a bluff-top or even a roadway that is cut or undermined by erosion, can be an unsalvageable situation, the reality is that many erosion dangers have, in fact, been repaired offering years of continued protection and use.



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In Pacifica, the importance of Highway 1 is as critical as it is along the Coastside. I initiated and was successful in having Highway 1 at Surfer's Beach protected, thus avoiding a major transportation crisis should it be cut by erosion. I am completely aware that someday, such a solution will no longer work, but this year, it did work. Should the Highway 1 corridor in Pacifica become unusable due to Sea Level Rise, it will completely alter the economic climate of the entire region, resulting in potential losses of millions of dollars. The notion that nothing should be done as part of long-term planning to, at the very least, resist ongoing retreat as long as possible, is not something I advocate.

I would also like to note that the Sharp Park Golf Course, which is owned by San Francisco and has been a valuable recreational asset for more than 70 years, should be protected and maintained for as long as possible. The berm created to keep the Pacific Ocean at bay has been an effective man-made barrier that can be properly maintained well into the future. As I have stressed, there will come a day when the possibility of catastrophic failure will eliminate choices, but no amount of "managed retreat" will make the same difference that a protective berm could.

The draft plan should include a two-pronged approach at realistically dealing with the imminent threat of sea level rise and beach erosion along the coast. The ongoing policy of emergency repair, while obviously incapable of turning back nature's inexorable march, has proven to be effective in maintaining property value and use for extended periods. This should be continued in areas where property value and public safety are threatened on an immediate basis, as it has been functioning.

I would like to see efforts made to develop more serious protection of coastal assets rather than assume an additional 10 or 20 years of use is not worth the cost or effort. While hundreds of millions of dollars will be spent shoring up levees and seawalls in the Bayside area, with a public vote being sought to generate that money, it seems that the Coastal areas are left to their own devices. Right now, that has meant the city has been scrambling to find the resources to protect property only after an emergency has inched certain areas toward total failure.

Coastal erosion will happen, but we don't need to rush it or watch by the sidelines as the inevitability of sea level rise moves us closer to actually not having a choice at all.



Don Horsley  
Third District Supervisor

My apologies for this last minute request for answers about the CSMP for Pacifica.

Many thanks,  
Margaret Goodale

**Ch. 5 Table 14:**

Reach14 Rockaway Cove

Why is the sewer pump station in the high parking lot north of the hotels and east of the riprap not considered at risk? Homes on San Marlo/Maitland, well below the sewer lift station, not at risk?

Reach 15 Linda Mar

The city has two or ? pumps on the beach. At least one sends wastewater north to the treatment plant. Two outfalls release storm water directly onto the beach from lower Linda Mar. The table excludes two pumps and the outfalls. Shouldn't they be included? Identified/included in Table 14

**Ch. 4:**

Pg 48, Table 11: Infrastructure, habitat, and species currently at risk

- Rockaway sewer pump station
- Linda Mar sewer pump station , 2 street drain pump/outfalls omitted why?
- Highway drainage north of Crespi not at risk???

**Ch 5:**

Page 50 Table 12 Summary of Measures shows “Managed realignment for Sharp Park, Rockaway, Linda Mar – needs further explanation. Is this the same as managed retreat?

Page 52-3 Table 13 Why is managed realignment excluded here but included on pg. 63 where Option 4 is labeled “Hybrid”

P 56 Table 14 Infrastructure at risk under different alternatives

P 63 Table 14 Infrastructure at risk under different alternatives

alternatives  
Page 63 Sharp Park GC – in B/C and Revenue, Option 4 Hybrids = what???

- For description and beach width, Option 4 is “no action”, allow erosion? berm to erode away?
- Define “natural capital” - Need discussion of natural capital

Page 64 Rockaway beach “Hybrid”? = combination of maintain seawall and no action?

Page 65 Linda Mar beach Benefit and Costs, Visitor revenue note Option 4(hybrids)\*

- I do not see an explanation of hybrids\* only a “no action” option allowing erosion

- Please define ”natural capital”

- What happens to the existing seawall along the parking lot???

The bathrooms and pump station with a three foot SLR?

## **Ch. 9:**

Page 86-87

9.2 Alternate conclusions: Why is Pacifica titled “alternate” vrs “Coastal and Sediment management conclusions”?

Note: ravine north of Levine property has culvert under Palmetto from upper “bowl” property that neither Daly City nor Pacifica seems to own. Is it included anywhere?

Please confirm that the only positive net benefits in Pacifica result from managed retreat/allow erosion at Linda Mar and Sharp Park. The report indicates negative net benefits for Pacifica in the hundreds of millions of dollars by 2050 regardless of the alternatives/options/measures that are applied everywhere else. Please confirm and highlight this finding, explain why only Linda Mar and Sharp Park may have a positive net benefit. Please recommend future actions the City might take, including funding sources.

Again, thank you,  
Margaret



Southern California Golf Association  
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February 16, 2016

Coastal Sediment Management Workgroup  
Suzan Ming, Project Manager  
United States Army Corps of Engineers  
911 Wilshire Blvd.  
Los Angeles CA 90017

Clifton Davenport, Project Manager  
California Geological Survey  
135 Ridgeway  
Santa Rosa CA 95401

Subject:                    **SF Littoral Cell CRSMP Draft Plan – January 2016**

Dear Coastal Sediment Management Workgroup:

**Identity of Commenter:**

The Southern California Golf Association (SCGA) is a 117-year old non-charitable nonprofit corporation incorporated under the laws of the State of California to provide certain public benefits to 446 golf courses, 1,250 member clubs and 145,000 individual members. The following comments are submitted on their behalf.

**Requested Action:**

Rejection of those “management options” in the Draft Plan that would prohibit the maintenance and repair of the Sharp Park Seawall that protects the Laguna Salada freshwater wetlands that provide habitat for certain endangered and/or protected species, accommodates moderately priced recreation for the users of the Sharp Park Municipal Golf Course, and provides security for the West Fairway Park and Clarendon Road neighborhoods of Pacifica.

**Comments:**

Introduction

The City and County of San Francisco has been mandated by the Army Corps of Engineers and a 2012 United States Fish & Wildlife Service Biological Opinion and Incidental Take Statement to maintain the subject seawall and keep it operational. When the Coastal Commission granted a Coastal Development Permit in 2015 to enhance the habitat and improve the pumping system at Sharp Park, the Commission expressly rejected a demand from the opponents of the project to impose the kind of “managed retreat” that three of the four suggested management options would necessarily impose upon the seawall, a “managed retreat” that would destroy habitat preserving certain

rejected a demand from the opponents of the project to impose the kind of “managed retreat” that three of the four suggested management options would necessarily impose upon the seawall, a “managed retreat” that would destroy habitat preserving certain protected species and the 84-year old publicly owned Sharp Park golf course that has provided recreation for generations of San Francisco Bay Area residents. Sharp Park possesses unique interest and importance for the golf community in California and well beyond; it is a unique public seaside links golf course, built in the early 1930’s by Alister MacKenzie, universally acclaimed as one of the greatest golf course architects in history.

### Background

These were the latest in a long line of decisions, findings and actions by lead resource agencies to balance recreational and environmental goals at Sharp Park – all of which have been repeatedly upheld by the Courts.

In 1992 San Francisco and the California Coastal Conservancy commissioned Philip Williams & Associates (PWA) to prepare the “Laguna Salada Enhancement Plan.” PWA recommended managing the land in a manner that would allow for public access, maintain natural habitat, and preserve the golf course that had inhabited the site since the 1930’s. The Plan included very specific habitat enhancement prescriptions for frogs and snakes, pumping to maintain water levels and quality, dredging to control tules in the ponds and wetlands, preservation of the Sharp Park seawall to protect salt water intrusion upon the freshwater necessary to preserve various plant and animal species dependent thereon, and a recycled water irrigation system.

PWA concluded that erosion of the seawall in the 1980’s had caused high salinity in the lagoon and nearly destroyed the endangered frog and snake species dependent upon the freshwater habitat created and maintained thereby, leading PWA to make preservation and enhancement of the seawall a central organizing principle of the final “Plan” it produced for the Coastal Conservancy.

In 2009 San Francisco’s Recreation and Parks Department released a “Sharp Park Conceptual Alternatives Report” updating the 1992 PWA report. The Department recommended additional habitat recovery measures in conjunction with preservation of the historic 18-hole golf course. Despite pressure from some quarters to close the golf course, the Recreation and Park Commission voted unanimously on December 17, 2009 to recover habitat while preserving the 18-hole golf course.

PWA’s recommended recycled water irrigation system was completed in October 2014 as a \$10 million joint venture of the San Francisco Public Utilities Commission and Pacifica’s North Coast County Water District. The project was funded in part by a planning grant from the State Water Resources Control Board and construction funds from the American Recovery and Reinvestment Act of 2009. The recycled water system was designed to deliver seventy-eight percent (78%) of its water to the golf course.

In 2011 the City and County of San Francisco applied to the Army Corps for a permit to improve safety, infrastructure, and habitat enhancement, a project that came to known as the “Pump House Project.” The project envisaged partial dredging of the ponds as well as improvements to the golf course’s flood control pumping system. As required by the Endangered Species Act, the Corps engaged the United States Fish & Wildlife Service (USFWS) for the purpose of deciphering the project’s potential to affect the protected California red-legged frog and the endangered San Francisco garter snake. USFWS issued a formal Biological Opinion thereon on October 2, 2012 that identified salinity as a significant threat to both species and determined to apply 32 specific conservation measures to issuance of the requested permit. Among the “measures” was the following, which pertained to the seawall roadbed, which is the actual seawall itself:

*[Conservation Measure] 31. During and following completion of the Project, the SFRPD shall maintain and keep in good repair the sea wall road, which provides*

*[Conservation Measure] 31. During and following completion of the Project, the SFRPD shall maintain and keep in good repair the sea wall road, which provides the only vehicle access for maintenance activities as described above.*

*Maintenance of the roadway on the sea wall is expected to include filling ruts in the surface with aggregate or comparable materials and repairing drainage issues by out sloping the roadbed.*

As part of the same document as the Biological Opinion USFWS issued an “Incidental Take Statement” under Sections 7(b)(4) and 7(o)(2) of the Endangered Species Act that adopted all of the Conservation Measures and mandated both the City/County and the Corps to implement and ensure compliance with all of them.

Following issuance of the USFWS Biological Opinion, US District Court Judge Susan Illston dismissed a lawsuit by the Center for Biological Diversity (CBD) and Wild Equity Institute (December 6, 2012) that sought to enjoin golf at Sharp Park under the Endangered Species Act. Judge Illston ruled that the lawsuit was mooted by the USFWS Biological Opinion and Incidental Take Statement, a ruling that was upheld in 2015 upon dismissal of the appeal by the US Court of Appeals for the Ninth Circuit.

After unanimous approvals in January 2014 by the San Francisco Planning and Recreation and Park Commission, the San Francisco Board of Supervisors approved the Pump House Project. Wild Equity and CBD brought a Writ of Mandamus in San Francisco Superior Court alleging that the approval violated the California Environmental Quality Act. This lawsuit was dismissed following trial on May 28, 2015.

Wild Equity next sued the Coastal Commission to block the 2015 Coastal Development Permit for the Project but dropped the suit after its motion for preliminary injunction was denied by San Mateo County Superior Court Judge Miram on August 20, 2015. San Francisco completed work on the Pump House Project in October 2015.

Since the California Coastal Conservancy sponsored PWA report in 1992, San Francisco’s plan to renovate the Sharp Park Golf Course while recovering habitat for frogs and snakes has been the subject of exhaustive studies, environmental impact reports, public hearings, decisions, orders, and enormous expenditures of dollars by the San Francisco PUC, San Francisco Recreation and Park Department, San Francisco Planning Commission, San Francisco Board of Supervisors, Pacifica’s North Coast County Water District, the United States Fish & Wildlife Service, United States Congress (via the American Recovery and Reinvestment Act of 2009), California Coastal Commission, California Coastal Conservancy, State Water Resources Control Board, San Francisco Bay Regional Water Quality Control Board, and the United States Army Corps of Engineers.

### The Draft Plan

The Draft Plan suggests four “management options” for the Sharp Park seawall.

Descriptions of these options make clear that one and only one of them would allow for the maintenance and repair of the seawall. The other three would purposefully encourage erosion of the seawall by proscribing maintenance and repair. Were any of these three to be adopted, the Incidental Take Statement for the Pump House Project, which is incorporated into the Corp of Engineers’ Section 404 Clean Water Permit, would be contradicted, and the City and County of San Francisco and the Corps of Engineers would be in violation of the Endangered Species Act as well as in violation of the various Resource Agencies that have considered and roundly rejected the rationale of three of the Draft Plan’s seawall erosion strategies for Sharp Park. An 84-year old publicly owned seaside links golf course, designed by iconic golf course architect Alister MacKenzie, the preservation of which was also a central tenet of various Resource Agency decisions, would be destroyed in the process, and the West Fairway Park and Clarendon Road residential neighborhoods south and north of the Sharp Park Golf Course would be subject to flooding, a recurrent problem since the 1940’s, according to the PMW 1992

would be destroyed in the process, and the west Fairway Park and Clarendon Road residential neighborhoods south and north of the Sharp Park Golf Course would be subject to flooding, a recurrent problem since the 1940's, according to the PMW 1992 Report.

**Conclusion:**

Prudence dictates that the Coastal Sediment Management Workgroup incorporate all relevant administrative and legal decisions into any final "Plan" and in the process eliminate contradictions that would produce a nullity. Management options that would prohibit the maintenance and repair of the seawall in favor of destroying habitat that supports endangered and/or protected species, eliminating an 84-year old public architectural landmark golf course that provides recreational and economic benefit, and subjecting two neighborhoods to periodic flooding, are unacceptable at Sharp Park.

On behalf of the SCGA and its 145,000 members I want to thank the Coastal Sediment Management Workgroup for considering the Association's comments and opinions.

Respectfully Submitted,

**CRAIG KESSLER** | Director, Governmental Affairs  
**SOUTHERN CALIFORNIA GOLF ASSOCIATION**

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cc: San Francisco Mayor Ed Lee  
San Francisco City Attorney Dennis Herrera  
Senator Diane Feinstein  
Congresswoman Jackie Speier  
San Francisco Board of Supervisors President London Breed  
State Senator Jerry Hill  
Assemblyman Kevin Mullin  
Assemblyman Phil Ting  
Pacifica City Manager Lori Tinfow  
San Mateo County Manager John Maltbie  
San Mateo County Parks Director Marlene Finley  
General Manager San Francisco Recreation & Park Department Phillip Ginsburg  
Julia Golomb, Kearns & West  
Joe Huston, Executive Director Northern California Golf Association (NCGA)  
Nick Zwick, President Alister MacKenzie Foundation  
San Francisco Public Golf Alliance

From: [dgiss@digitraining.com](mailto:dgiss@digitraining.com)

Subject: San Francisco Littoral Cell CRSM Plan Draft Comment

To Whom It May Concern:

As a homeowner west of Highway 1 in Pacifica I am very concerned about the fate of our community. Continued lack of attention to the protection of our coast is putting many business and residential properties in jeopardy. These business owners and residents set up shop and purchased homes here in good faith and simply cannot afford to lose our livelihood and lifetime investments.

It is well known Pacifica is not a wealthy enclave but a small blue collar community that has been a haven for those unable to afford the much more expensive bayside communities. Allowing the ocean's encroachment on the small sliver of land we call home will destroy one of the last affordable housing locations on the peninsula.

The golf course, the pier, the berm and all of the attractions on our coast are just about the only source of funding for our city outside of property taxes. Many people walk the berm regularly, fish from our pier and thousands of school kids and seniors walk the golf course every year. Loss of those would be devastating to our struggling economy and to those who depend on the physical, emotional and social support derived from these attractions.

It is a fact, during good weather, Highway 1 is overflowing with people seeking the enjoyment and relief of an outing to the coast. We need help to protect our coastline and in so doing continue to provide a, convenient, healthy, scenic, income producing tourist destination.

The Netherlands do it, why can't we?

Sincerely,  
Sharon Smoliarz  
770 Bradford Way  
Pacifica, CA 94044

**From:** Stan Zeavin [<mailto:margstan@sbcglobal.net>]  
**Sent:** Tuesday, February 16, 2016 1:56 PM  
**To:** Davenport, Clif@DOC <[Clif.Davenport@conservation.ca.gov](mailto:Clif.Davenport@conservation.ca.gov)>  
**Subject:** Sediment Report Questions

Here are a few questions about the Sediment Report that I feel should be addressed in more detail:

1) Given that there is SLR, and based on a review of the alternatives and options in the report, in the future, the City of Pacifica will eventually only have beaches at Linda Mar and Sharp Park. That means there will be no beaches in the north part of Pacifica except for the Sharp Park area, and only under a few scenarios. Given the value of beaches to the community and region, shouldn't the report identify these beaches (Linda Mar and Sharp Park) as priority locations for maintaining beaches?

2) There are functioning wetlands at Sharp Park in and around the golf course. Can these wetlands be used to dissipate flooding and waves? For example, in San Francisco bay levees are being located landward of the wetlands, wetlands are being restored and enhanced, and state and federal funding is being used to accomplish this flood protection scheme with ecological benefits: Why doesn't the report address this approach at Sharp Park?

3) How can managed retreat be implemented? I realize that this is a local question but Pacifica needs this information. Some guidelines would be much appreciated. For instance, the report has certain suggestions, and I've heard other phrases bandied about, e.g., "fee simple acquisition", conservation easements, rolling easements, transfer of development credits, etc. How can all of these choices be properly integrated? This last question, of course also includes such processes as armoring (temporary?) vs. abandonment, i.e., allow erosion.

4) Here's an easy one. Could you clarify the differences between "measures" and "alternatives/options"? This tends to be a bit confusing to me.

confusing to me.

Thank you,

Stan Zeavin  
Pacifica

Dear Julia Golomb,

Below is a new, updated comment letter to the San Francisco Littoral Cell CRSMP. The prior comment letter was sent in July of 2012. Please let us know if you have any questions. Thank you.

Bill McLaughlin  
Surfrider Foundation, San Francisco Chapter  
Restore Sloat Campaign Manager  
415-225-4083  
<http://www.sloaterosionob.blogspot.com>

2/17/2016

To: Coastal Regional Sediment Management Plan Workgroup, San Francisco Littoral Cell

The Surfrider Foundation supports the California Coastal Regional Sediment Management Plan (CRSMP) efforts to establish a regional approach to our state's erosion challenges. The following comments concern the San Francisco Littoral Cell and the proposed options presently identified by the San Francisco Littoral Cell CRSMP workgroup for addressing coastal erosion in our region.

As advocates for beach preservation, Surfrider generally advocates the use of a managed retreat approach in conflicts involving erosion threats to development. We are strongly against the use of coastal armoring as a long-term erosion response solution. In most cases, beach nourishment is not a long term sustainable solution. However, it may be a useful tool in limited circumstances, as a temporary measure to preserve a beach until a community develops a plan to relocate threatened development.

As for artificial reefs: We do not view them as desirable options due to a variety of factors including their unpredictable performance as well as potential negative impacts on ecosystems and coastal processes.

In general, we support sediment management policies that protect our sand resources or restore the integrity of our watersheds and their sediment producing/transport processes. As we have mentioned in our prior comment letter to the SFLC – CRSMP, we support all the recommendations for no-action in the reaches in which development is not threatened by erosion. The following comments pertain to other specific reaches identified in the current CRSMP.

San Francisco's Ocean Beach:

Our position in regards to erosion challenges in San Francisco is to support a long term plan of managed retreat. We will continue to participate in the Ocean Beach Master Plan which calls for infrastructure relocation at the South Sloat area. The use of beach nourishment is included in the Master Plan as means to facilitate the implementation of a managed retreat based solution.

Daly City's Mussel Rock Dump Site

Surfrider strongly suggests a managed retreat plan for the former garbage dump site at Mussel Rock. Coastal armoring enhancements currently being proposed will result in the continual loss of beach access, habitat and negative impacts to recreation. The

Surfrider strongly suggests a managed retreat plan for the former garbage dump site at Mussel Rock. Coastal armoring enhancements currently being proposed will result in the continual loss of beach access, habitat and negative impacts to recreation. The armoring in this area already disrupts coastal process, inhibiting sand from entering the system and moving along the coast. With the right managed retreat plan, a gradual clean-up of the dump site could be planned in such a way as to mitigate the cost burden. Additionally, the outcome of a retreat plan would be truly long term and sustainable as opposed to armoring which will need an open-ended monitoring, maintenance, and mitigation plan.

Pacifica Manor thru Beach Boulevard neighborhoods:

In our prior comment letter, Surfrider recognized that in these reaches property owners have a legal right to armor the beach to protect their property. However, the public also has a right to protect and preserve its beaches and shorelines. Surfrider supports Coastal Commission policy that places a 20 year expiration date on armoring permits. We support the use of beach nourishment in these sites only as an interim or temporary solution to preserve the beach. Ultimately, the community of Pacifica needs to develop a long term plan to remove endangered development away from these eroding bluffs. Additionally, any temporary sand nourishment for these erosion hotspots should come from nearby sources, preferably material that would have made it to these reaches through natural processes. Any sediment should be taken in such a way as to have minimum environmental impact.

The beach in front of Sharp Park Golf Course:

We advocate the removal of coastal armor fronting the golf course and a much more comprehensive restoration of the wetland. This is an ideal site to implement a managed retreat approach due to the fairly light amount of development needed to be removed.

Rockaway Cove:

See Comments on Pacific Manor and Beach Blvd. for developments that have armoring rights.

Lindamar Cove:

We support the current managed retreat effort already underway in this location.

Thank you.

Bill McLaughlin  
Surfrider Foundation, San Francisco Chapter  
Beach Preservation Committee Chair / Restore Sloat Campaign Manager  
[415-225-4083](tel:415-225-4083)  
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# United States Department of the Interior

## BUREAU OF OCEAN ENERGY MANAGEMENT

Pacific OCS Region  
760 Paseo Camarillo, Suite 102  
Camarillo, CA 93010-6064

FEB 17 2016

Mr. Clifton Davenport  
CSMW Project Manager  
California Geological Survey

Kearns & West  
Attn: Julia Golom  
475 Sansome Street,  
Suite 570,  
San Francisco, CA 94111

Dear Mr. Davenport:

The Bureau of Ocean Energy Management (BOEM) reviewed the Draft Coastal Regional Sediment Management Plan for the San Francisco Littoral Cell dated January 2016. BOEM recommends a short paragraph be added at the end of Section 5.3.2 (page 69) of the draft plan describing the potential of the Federal Outer Continental Shelf to provide sand for beach nourishment and coastal protection. Our recommended text is shown below:

*"Another potential source of sand for beach nourishment and coastal protection is the Federal Outer Continental Shelf (OCS) which lies seaward the State Tidelands/Federal OCS offshore boundary line located three (3) nautical miles offshore the coast. Large sand deposits are known to exist on the OCS adjacent to Ocean Beach in water depths ranging from 30 - 60 feet, which is well within the reach of current dredging technology. Due to depth of closure concerns, dredging from State Tidelands may not be a viable option. The Federal OCS, therefore, constitutes a potential primary source of sand for future beach nourishment needs. Pursuant to Public Law 103-426 (43 U.S.C. 1337(k)(2)), the Bureau of Ocean Energy Management (BOEM), U.S. Department of the Interior, is authorized to negotiate, on a noncompetitive basis, the rights to OCS sand, gravel, or shell resources for shore protection, beach or wetlands restoration projects, or for use in construction projects funded in whole or in part by or authorized by the Federal government. BOEM does not charge a fee for sand used for such purposes."*

Please contact me by email at [joan.barminski@boem.gov](mailto:joan.barminski@boem.gov), or call 805/384-6316, if you have any questions. Lisa Saylor Gentry, of my staff, may also be reached at [lisa.gentry@boem.gov](mailto:lisa.gentry@boem.gov), or 805/384-6390.

Sincerely,

Joan R. Barminski  
Regional Director  
Pacific OCS Region

cc: Julia Golomb  
Outreach Consultant  
Kearns & West

February 17, 2016

Coastal Sediment Management Workgroup  
Suzan M. Ming, Project Manager  
U.S. Army Corps of Engineers  
911 Willshire Blvd.  
Los Angeles, CA 90017

Clifton Davenport, Project Manager  
California Geological Survey  
135 Ridgeway  
Santa Rosa, CA 95401

**Re: SF Littoral Cell CRSMP Draft Plan, January 2019**

Dear CSMW,

While reviewing the SF Littoral Cell CRSMP Draft Plan, January, 2016, I was surprised that there were no references to the City of Pacifica's General Plan and Pacifica's Local Coastal Land Use Plan recognizing the Sharp Park Golf Course as an affordable, historic, recreational resource that should be preserved.

Another surprise was the Report's reference to the protective berm as only "public access *to the shore*", a description that greatly minimized and misrepresented its public use and environmental significance: 1) for the many visitors who walk it daily and 2) as an important barrier to intrusion of salt water into the fresh water habitat.

The berm trail is a scenic, much visited segment of the California Coastal Trail that links the Pier and Beach Boulevard Promenade with the trails heading south to Mori Point (GGNRA), Rockaway Beach, Linda Mar Beach and beyond to trails at Pedro Headlands, Devils Slide and Montara Mountain. However, this report discounted the berm trail and all alternatives but the one which recommended that the coastal trail berm deteriorate and allow salt water to enter the habitat and possibly flood the golf course and lake, in an area that for over 50 years provided a fresh water habitat for the threatened Red legged frogs and endangered San Francisco garter snakes. The Draft Plan's vision proposed for this site will likely dismantle and destroy a recreational and environmental resource that has existed there for 80 years and replace it with a speculative human vision of what would best for the creatures, including a huge highway bridge construction project to replace the existing Highway 1. I wonder how well the species will survive this?

Also the Sharp Park Golf Course and the public archery range located east of the golf course are part of the same 400 acre property, and provide low cost recreation and participation of families and youth in an activity that has no other local sites. The CRSMP Draft Plan doesn't mention the importance of these activities to residents and the many visitors who come to Pacifica to visit the coast and enjoy outdoor recreation in its many forms.

It's important to note that the City and the residents of Pacifica have demonstrated a strong commitment to the preservation of the natural areas within our boundaries. Personally I served from 1987-89 as a member of the Open Space Task that produced the Open Space Task Force Report (OSTF) in 1989, then in 1990-92 on the Open Space Committee- tasked with implementing the recommendations of the OSTF report, was elected the Pacifica City Council in 1992 and gave testimony before to Coastal Commission in support of the purchase of the Pedro Point Headlands property, served on the Pacifica Land Trust Board from 1998-2002 during which time we were able to partner with the Trust for Public Land to purchase the Mori Point property which was transferred to the GGNRA shortly thereafter, served on the City Council again from 2002-2010, and currently serve on the Open Space and Parkland Committee. I mention this because I'm not a golfer however I understand its value to others, and that it contributes to their quality of life. During all the time I spent on open space protection efforts in Pacifica, I don't recall anyone suggesting removing the golf course. The Sharp Park Golf Course is a valued recreational resource for our area that has been vetted by the regulatory agencies and the courts.

That said, now the coastal communities are dealing with the impacts of coastal erosion and sand migration and it is important to anticipate and work together both within the community and with neighboring coastal communities to discover and determine what courses of action we can take together to anticipate and prepare for future events like the one we are experiencing now. This initial effort (the San Francisco Littoral Cell CRSMP Draft Plan) is a start, but it is not comprehensive, and supports a recommendation that prohibits maintenance and promotes a personal vision.

What is needed is a deeper examination of what is doing on along our coast, and the development of solutions that include a collaborative (not combative) approach to developing a plan to address this tremendous challenge we face as coastal communities, a plan that includes the golf course continuing on that site in with a redesign that supports the species there and adaptable to the changing circumstances and conditions.

Respectfully submitted,

Julie Lancelle  
224 Modoc Place  
Pacifica, CA 94044

STATE CAPITOL  
P.O. BOX 942849  
SACRAMENTO, CA 94249-0022  
(916) 319-2022  
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DISTRICT OFFICE  
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SAN MATEO, CA 94402  
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# Assembly California Legislature



**KEVIN MULLIN**  
SPEAKER PRO TEMPORE  
ASSEMBLYMEMBER, TWENTY-SECOND DISTRICT

**COMMITTEES**  
BUDGET  
BUSINESS AND PROFESSIONS  
ELECTIONS AND REDISTRICTING  
HOUSING AND COMMUNITY  
DEVELOPMENT  
REVENUE AND TAXATION

**SUBCOMMITTEES**  
BUDGET SUBCOMMITTEE NO. 4 ON  
STATE ADMINISTRATION

**SELECT COMMITTEES**  
CHAIR: BIOTECHNOLOGY  
WORKFORCE INVESTMENT BOARD

February 17, 2016

Kearns & West  
ATTN: Julia Golomb  
475 Sansome Street, Suite 570  
San Francisco, CA 94111  
jgolomb@kearnswest.com

To Whom It May Concern,

I write in strong support of protecting Pacifica and the San Mateo County coast from further beach and cliff erosion. The concept of "managed retreat" is one that is not in the best interest of Pacifica, the County, the State, or the Nation. The California coast is worthy of protection and preservation and action should be taken to ensure that it remains intact for future generations.

A coastal management strategy that hastens degradation of the coastline is a losing strategy and one that is defeatist at best and dangerous at worst. Great efforts have been taken to combat the effects of a punishing ocean and the damaging impacts of climate change, sea level rise, and extreme weather events. It is not an overstatement to say that anything less than an extraordinary effort to hold back the sea will result in devastation for many who call the coast home and loss for many more who enjoy its commercial, recreational, and scenic offerings.

I would like to see efforts made to mitigate the negative effects of the sea on the San Mateo County coast; efforts that recognize and protect valuable property (both public and private) and assets such as Highway 1. The gradual degradation and erosion of the coast are unacceptable and efforts need to be made to stabilize and strengthen our defenses to protect people and property from future extreme weather events that are inevitable and increasingly damaging.

Sincerely,

A handwritten signature in blue ink that reads "Kevin Mullin".

KEVIN MULLIN  
Speaker pro Tempore  
22<sup>nd</sup> Assembly District

KM:bc

National Park Service, Golden Gate National Recreation Area

**Comments on the San Francisco Littoral Cell Coastal Regional Sediment Management Plan,  
Draft January 2016**

February 17, 2016

Comments on Content:

**GGNRA Jurisdictional Boundaries:**

Section 3.1 – The San Francisco Littoral Cell and Plan Footprint; p. 13, 2nd paragraph describing jurisdictional boundaries: Note also that GGNRA’s jurisdiction along the outer coast in SF County extends 1/4 mile offshore (via a State Lands Lease). Also note GGNRA’s jurisdiction offshore of the Presidio inside the Golden Gate. This is important given that a potential sediment source is identified within GGNRA’s jurisdiction. Inside the Bay along the Presidio shoreline, GGNRA owns submerged lands to 300 feet offshore.

**Section 5.3.2 – Offshore dredge locations**

Reference to Figure 22 which shows a potential sediment source just inside the Gate along the Presidio shoreline: Please note in text that this is within land owned and managed by GGNRA. GGNRA owns submerged lands to 300 feet offshore along the Presidio shoreline inside the Bay. Removal of sediment from this location would require coordination with and approval by GGNRA and may not be consistent with NPS policies.

**Visitor Use Numbers for GGNRA Beaches:**

We are concerned that the visitor use estimates are based on outdated or incomplete information and that this may be skewing the results presented in Section 5.2. Please update the visitor use numbers provided in Table 6 and the economic analysis for GGNRA beaches based on information in 2011 report from Industrial Economics, Incorporated. (A hard copy of this report was provided to Kearns and West at the January 14, 2016 Agency Technical Review Meeting.) The IEC report includes detailed estimates of beach visitors for Ocean Beach, Baker Beach and Fort Funston which are much higher than those provided in the draft plan: Ocean Beach estimated annual visitors is 340,000 (draft SRLP RMP) vs. >2.7 million (IEC 2011), Baker Beach estimated annual visitors is 150,000 (draft plan) vs. almost 500,000 (IEC 2011), and estimated annual visitors to Fort Funston is 130,000 (draft plan) vs. over 500,000 (IEC 2011). IEC annual use numbers are based on a combination of visitor counts and car counters and a detailed methodology is included. Updating these numbers will improve the economic analysis and is likely to change the findings presented in Section 5.2 which identify the net benefits of various approaches to managing sediment in erosional hotspots.

**Section 5.3.2 - Sediment from GGNRA:**

This section may be better titled “Sediment Stored in Watersheds”. Although there may be dams in certain areas that are within GGNRA's legislative boundary, there are no dams that are in areas currently

owned or actively managed by GGNRA. Perhaps make this section more general and could also discuss prevalence of numerous undersized culverts within coastal watersheds that impede sediment delivery to coast - this is likely true on lands owned/managed by a variety of landowners/managers

### **Link Between Outer Coast and Central Bay**

Suggest strengthening the language and discussion in the document about the link between sediment processes in the central Bay and effects on the outer coast (e.g., effects of sand mining and sediment extraction on erosion at South Ocean Beach) and how the SFLC Plan will be coordinated with the Regional Sed. Mgmt plan for the Bay.

### **Editorial Comments:**

**Chapter 1, Introduction:** There are several places in the introductory chapter where a little more context might be useful to readers. Most of these suggestions include text or content that is further developed within the document but which would benefit from a little more context up front:

p. 1, Define 'OBMP' before its first use in main body of document

p. 2, 2<sup>nd</sup> paragraph: Suggest adding additional clarifying text to end of first sentence: Substantial amounts of sand were added to the Ocean Beach shore in the period from 1900 – 1930 from sand dunes ***that historically covered much of the western half of the city...***

p.2, 2<sup>nd</sup> paragraph: add a reference to Figure 1 after text "San Francisco Bar"

p. 2, bullet points: Suggest adding an additional bullet point referencing changes in sediment supply (e.g. due to extractions for mining or dredging MSC).

p. 5 (and throughout document) – Olmsted 1979 reference should be Olmsted and Olmsted, 1979.

p. 7, first paragraph, sentence starting with "Sand was also placed..." could use some cleaning up to make it clearer what time period, volumes, sources, etc. are implied. Assume the reader knows less about the history of OB. e.g.: "Sand was also placed on Ocean Beach over the years, being taken from the large sand dunes (***that historically covered much of the western half of the City***) and from excavations (***what type of excavations? Is this opportunistic use of sand excavated as a result of other development?***), but the ***total*** volume of placed sand ***over the last century? Since the early 1900s?*** is much smaller than the ***total*** excavated volumes ***in that same time period"***.

p. 7, 1<sup>st</sup> paragraph: capitalize "Bar"

## Section 1.2 (Coordination)

p. 7: Suggest re-wording the last sentence at bottom of p. 7

“Conversely, the political and management systems in place do not currently view the sediment pathways as linked”. I think there is a general recognition that sediment processes are linked – the issue is more about differing priorities and policies

p. 8: top of page, 3<sup>rd</sup> line: suggest changing “when the need and funding has allowed” to “as needed”. As worded it sort of implies that GGNRA only participates in the conversation if there is \$\$ exchanged.

## **Section 3.1 – The San Francisco Littoral Cell and Plan Footprint**

Table 3, p. 14. Baker Beach backshore includes dunes as well as bluff

p. 17, description of Baker Beach reach: Add to end of first sentence: “**all within the GGNRA**”. Delete “within the GGNRA” from end of 2<sup>nd</sup> sentence. From 3<sup>rd</sup> sentence, delete the word “one” before “upon which sits the Presidio...”, and replace “historic area” with “National Historic Landmark”.

p. 17, description of South Ocean Beach Reach: add the word “managed” before retreat in 3<sup>rd</sup> sentence.

## **Section 3.2 – Geology**

p. 20, last paragraph. The Wills et al., 2011 reference is missing from the Lit Cited section at end of document.

## **Section 3.6.1 - Recreation Overview**

**p. 32, top of page describing Fort Funston**: Re-word the last sentence. As written it implies that 90% of visitors hike down to the beach, but it should probably read that 90% of visitors hike on the trails on the bluffs and DO NOT hike down to the beach. A similar statement is made later in the document (perhaps in one of the appendices) that is more accurate, so it looks like this sentence got carried over incorrectly.

## **Section 3.6.2 Attendance and Beach Amenities**

p. 37, Table 6 – What is meant by overnight visitors? Is this referring to illegal camping? Or is it meant to indicate that beach visitors are not residents but are visiting the area from out of town?

## **Section 4.4 – Existing Coastal Armor**

If additional information is required, GGNRA can provide a report completed in 2013: Inventory of Coastal Engineering Projects in GGNRA”.

## **Section 5.1 – Measures and Alternatives**

Sand Placement with Artificial Reefs – Is there any additional information that can be provided about site conditions (e.g., water depths, wave heights, nearshore bathymetry) that may or may not favor the use of artificial reefs?

Figures 12-20 identifying the benefits and costs of various management approaches – There may be a tendency for readers to jump to these sets of figures/graphs as the conclusive recommendations for the specific areas identified. It seems important to clarify the assumptions and uncertainties that went into generating these figures – not just in the text but somewhere in the figures or figures captions as well. That isn't necessarily clear from the way it's currently presented. Along the same lines, it seems that the visitor numbers and economic analysis has a huge impact on the results presented in these graphs. These should be updated for GGNRA beaches based on numbers provided in the 2011 IEC report, but it should also be noted very clearly in the text how much these figures could change with different information.

Figures 12-20, other comments:

Table in top, right corner – suggest removing the last column showing the 'years'. This info is outdated and not really necessary – somewhat redundant to the information in the column showing the number of sand placements through 2100.

Graph in bottom right: what does 'PV' represent?

## **Section 9.1 – Coastal and Sediment Management Conclusions**

Bullet point indicating that sewer systems in northern Daly City and SF are linked. Is this accurate?



*Scenic Pacifica*  
Incorporated Nov. 22, 1957

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## CITY OF PACIFICA

170 Santa Maria Avenue • Pacifica, California 94044-2506

[www.cityofpacifica.org](http://www.cityofpacifica.org)

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**MAYOR**  
Sue Digre

**MAYOR PRO TEM**  
Mike O'Neill

**COUNCIL**  
Mary Ann Nihart  
Karen Ervin  
John Keener

February 17, 2016

Subject: San Francisco Littoral Cell CRSMP Draft January 2016

Dear Julia:

Below are our comments of the Draft San Francisco Littoral Cell CRSMP.

	<u>Page</u>	<u>Comment</u>
1.	iv	Linda Mar Beach paid parking started August 2013.
2.	18	City of Pacifica <b>Council Chambers</b> is located on 2212 Beach Boulevard.
3.	35, Table 5	There are restrooms, showers and public transportation at Rockaway Cove Beach. There is paid public parking at Linda Mar Beach. Parking fee are \$4 for 4 hours or \$8 for whole day.
4.	35	Linda Mar Beach paid parking started August 2013.
5.	37, Table 6	Pacific Sales Tax is 9.0% and Transient Occupancy Tax is 12.0%.
6.	48, Table 11	We have some concerns regarding the accuracy of the data on Table 6. There are two (2) pump stations at Linda Mar Beach.
7.	49	For any of the Measures and Alternatives to be effective in cost and action, a comprehensive Sediment Study must be done for the whole littoral cell.
8.	77	The City of Pacifica supports the Governance structure as discussed in the January 26, 2016 meeting.

Sincerely,

Raymund Donguines, P.E.  
Acting Senior Civil Engineer

Cc: File



February 17, 2016  
Benjamin Gettleman, Senior Director  
Kearns & West, Inc.  
475 Sansome Street, Ste. 570  
San Francisco, CA 94111

Edwin M. Lee  
Mayor

Mohammed Nuru  
Director

**Fuad Sweiss, PE, PLS**  
City Engineer &  
Deputy Director

**Office of the City Engineer**  
Infrastructure Design  
and Construction  
San Francisco Public Works  
1 Dr. Carlton B. Goodlett Pl.  
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[twitter.com/sfpublicworks](https://twitter.com/sfpublicworks)

**Subject:** City and County of San Francisco Technical Review Comments on the draft Coastal Regional Sediment Management Plan (CRSMP) for the San Francisco Littoral Cell

Dear Mr. Gettleman,

Please find comments from the San Francisco Utilities Commission (SFPUC), San Francisco Recreation and Park (Rec & Park), and San Francisco Public Works (Public Works), below.

SFPUC:

- Any reference to this document providing policy rather than guidance should be removed. In the Executive Summary, we suggest removal of “policy” from the first sentence.
- The Governance section should include language that relates to each jurisdiction in that they may have the need to move forward with projects without this structure in place. In other words, this guidance document shouldn’t impede any on-going or necessary work.
- Some entity should be in charge of convening this group.
- There should be a “goal” or “objective” related to the work.
- ES. 8: The Ocean Beach Master Plan was completed in May 2012

Rec & Park:

- For each of the CRSMP’s “erosion hazard zone” reaches, the Plan selects a set of erosion mitigation alternatives specific to that reach and analyzes the costs and benefits of these alternatives. Instead of selecting a different set of mitigation alternatives for each reach, we suggest that the Plan select a consistent menu of alternative mitigation strategies to analyze across all erosion hazard zones reaches based on economic, ecological, and recreational considerations. Rather than presenting a standard set of mitigation alternatives for all reaches, the Plan varies the menu of alternatives for each reach prior to analysis (without justifying the menu selected).

This approach confounds a potentially helpful cross-comparison of how the same mitigation alternative might perform in different reaches and obscures the analysis of

to analysis (without justifying the menu selected).

This approach confounds a potentially helpful cross-comparison of how the same mitigation alternative might perform in different reaches and obscures the analysis of what the best mitigation approach for each reach might actually be.

- The CRSMP quantifies the ecological effect of each mitigation measure only by looking at beach health (and specifically at beach width). By focusing only on the benefit of unconstrained shorelines, the Plan disregards potential impacts to other types of ecological assets, and always makes a managed retreat option look more ecologically appealing. We ask that the Plan's biological analysis be broadened to include a discussion of all ecological assets at risk. Additionally, the Plan should include a matrix analysis of the ecological assets at risk under each mitigation alternative discussed for each reach.
- The CRSMP only quantifies the economic benefits and impacts (i.e., revenue) derived from beach use, without considering the economic benefits and impacts of other forms of recreation within the coastal erosion hazards zone for each reach. This 'beach-only' approach to economic benefit and impact discounts the recreational value of the non-beach resources in each reach, thereby making a managed retreat approach always look more economically appealing.

#### Public Works:

- Apart from mention in older reports, any presentation of a plan to renovate the Fleishhacker Building should be removed as it is no longer extant (burned down in 2012).
- Section 3.5.2, State and Federal Marine Protected Areas: If the waters off of San Francisco Ocean Beach are included in the Monterey Bay National Marine Sanctuary (MBNMS), as is currently under review, what are the implications for the CRSMP? Inclusion in the MBNMS would seem to remove the San Francisco portion of the SF Littoral Cell from all but managed retreat as an option. Should this be discussed here?
- The parking situation at Sloat Blvd is rapidly changing and has affected the vehicular access to the southern stretch of Ocean Beach. Mention of this would be relevant, particularly in the economic-analysis portion (Appendix F).

Additionally, the document is in need of proofreading, particularly in the Appendices. There are many instances of typos and sentences with missing words or syntactically-confusing structure.

#### Section 3.1:

- Table 3: typo--Pleistocene is misspelled.

#### Appendix C:

- p 39, 2<sup>nd</sup> paragraph, last sentence: extra gap/missing sentence?
- p. 34, 4<sup>th</sup> paragraph, 2<sup>nd</sup> sentence: Wrong genus for pickleweed (should be *Salicornia*).
- p. 41, 4<sup>th</sup> 2<sup>nd</sup> sentence: typo (is should be if?)
- p. 42, 5<sup>th</sup> paragraph, last sentence: missing word (in?).
- p. 20: typo, "coasted" should be coastal.

#### Appendix F:

- p. 1, 3<sup>rd</sup> paragraph: text missing-- "such as Frisbee throwing and surfing, including."
- p. 4, 4<sup>th</sup> paragraph: text missing -- "A could of beaches..."

If you have any questions or comments, please call Boris Deunert, Manager of Regulatory Affairs at 415-558-4009.

Sincerely,

Fuad Sweiss, PE, PLS  
City Engineer and Deputy Director

Cc: Patrick Rivera, SFPW  
Fernando Cisneros, SFPW  
Anna Roche, CWP  
Stacy Bradley, Rec & Park  
John Roddy, CAT

Anna Roche, CWP  
Stacy Bradley, Rec & Park  
John Roddy, CAT  
Diana Sokolove, CPC

*Dear Public Servants,  
I take the liberty in forwarding my comment sent to Kearns West regarding the Sharp Park Seawall in Pacifica. Thank you all for your help to keep this historic golf course and the adjoining neighborhoods protected, by maintaining this crucial Seawall.  
Mark Smoliarz  
West Fairway Park resident.*

Dear Sir or Madam:

As a long time homeowner in West Fairway Park, located adjacent to Sharp Park Golf course, I fully oppose the Draft's management options that would exclude or prohibit the maintenance and repair of the Sharp Park Seawall.

The seawall is crucial to the historic golf course and its club house and restaurant, along with the endangered habitat it supports and the long established adjacent residential communities.

The golf course, along with the seawall berm, offer recreational activities to thousands of golfers, joggers, hikers, dog walkers, cyclists, nature lovers, beach goers, surfers and fishermen, each year. This area is one of the most popular destinations, not only for locals and nearby communities, but for tourists and out of town visitors.

Having played and acted as marshal at this historic course, I noticed the substantial numbers of seniors and students using this reasonably priced and easily walkable course. The historical landmark designated restaurant and clubhouse is a popular destination for community meetings, gatherings and private functions such as weddings and large banquets. It is one of the most vital economic and social destinations in all of Pacifica.

As I understand it, San Francisco is mandated by the US Army Corps of Engineers and a 2012 US Fish and Wildlife Service Biological Opinion and Incidental Take Statement, to maintain the seawall and keep it in good repair. When the California Coastal Commission in 2015 granted a Coastal Development Permit for a San Francisco project to enhance the habitat and improve the flood-prevention pumping system at Sharp Park, the Commission expressly rejected a demand from project opponents to impose a "managed retreat" condition on the seawall.

I therefore fail to understand how the draft can make non maintenance seawall recommendations and be in compliance with mandated seawall maintenance requirements.

I am a retired senior and as such, my home represents a very crucial source of income for my retirement years. Any plan which calls for disregarding maintenance of the seawall, is simply not acceptable and I am committed to doing everything, within all available legal options, to keep up the maintenance of the seawall. I'm quite baffled of any plans that may have adverse affects to the endangered habitat and adjoining residential neighborhoods.

Thank you for your consideration in this matter.

Mark Smoliarz  
770 Bradford Way  
Pacifica, CA 94044

Mark Smoliarz  
770 Bradford Way  
Pacifica, CA 94044

To Whom It May Concern:

As a new homeowner in West Fairway Park, located adjacent to Sharp Park Golf course, I fully oppose the Draft's management options that would exclude or prohibit the maintenance and repair of the Sharp Park Seawall.

I purchased my house in 2013 in West Fairway Park because I enjoy the trails and outdoor activities that I have access to so close to my home. Ignoring maintenance would directly impact all the outdoor activities I partake in individually as well as with family or friends. The seawall is used daily by residents and tourists alike as a place to enjoy our beautiful California coast.

Both the golf course and the seawall offer recreational activities to thousands of golfers, joggers, hikers, dog walkers, cyclists, nature lovers, beach goers, surfers and fishermen, each year. This area is one of the most popular destinations, not only for locals and nearby communities, but for tourists and out of town visitors. The draft itself mentions data that suggests that this "area is heavily visited, generating at least \$60 million annually in spending by residents and tourists."

The seawall is critical to the survival of a historic golf course, along with the endangered habitat it supports and the long established adjacent residential communities. There has also been much effort to maintain and reestablish native plants and animal life in the nearby park, which is also protected by the seawall. It also helps maintain the sensitive environment for many animal species including the California red legged frog and the and the San Francisco garder snake. Without the seawall, all efforts would be lost.

The golf course, designed by Alister MacKenzie, is a historical landmark established as a popular destination for community meetings, gatherings and private functions such as weddings and large banquets. It is one of the most vital economic and social destinations in all of Pacifica.

We are proud of the small, eclectic town we live in and of the locally owned businesses that we have access to in Pacifica. The seawall is an attraction for many bay area residents and tourists, bringing in customers to our small businesses and restaurants. Not maintaining the seawall can directly impact the economy of our small town.

My family and I personally use the seawall everyday as a place to walk or run, ride bikes, and enjoy nature. Everyday I witness many families and individuals utilizing the seawall as we do. I do not see how a draft that recommends "managed retreat" on the seawall would benefit our community. Not maintaining the seawall would remove a place that has been a valuable area of outdoor activities for our community. It is vital to our community that the seawall exist.

Thank you for your consideration in this matter.

Sincerely,

Marissa Wat and Nick Burger  
764 Bradford Way  
Pacifica, Ca 94404

February 17, 2016

Coastal Sediment Management Workgroup  
Suzan M. Ming, Project Manager  
U.S. Army Corps of Engineers  
911 Wilshire Blvd.  
Los Angeles, CA. 90017

Clifton Davenport, Project Manager  
California Geological Survey  
135 Ridgeway  
Santa Rosa, CA. 95401

**Re: SF Littoral Cell CRSMP Draft Plan, January, 2016  
Comments of Alister MacKenzie Society**

Dear Coastal Sediment Management Workgroup,

The Alister MacKenzie Society is an international fellowship of golf clubs at the courses built by Dr. Alister MacKenzie, widely recognized as one of history's preeminent, and most influential, golf architects. Our member clubs are found in Australia and New Zealand, Argentina, the British Isles, the United States, and Mexico, and include some of the very most famous and highly-rated courses in the world.

Although Dr. MacKenzie was an exponent of the great social and recreational and public health values of public golf, virtually all of his courses are today private. Sharp Park is an exception. It is a municipal course, accessible and available for a reasonable fee to whoever shows up at the starter's window.

It is important not only to public recreation, but also to the sport of golf, that the publicly-available work of this great architect be preserved and available to the public. Sharp Park connects today's golfers, across all genders, classes, races, and economic strata, with the history of their game, and with one of golf's greatest architects. This kind of historical / artistic connection across the generations is essential to all human institutions – sports and golf, included.

For this reason, we write to express opposition to any and all "management alternatives" propounded in the CSMW's January, 2016 Sediment Management Draft Plan for the San Francisco Littoral Cell, to prohibit maintenance and repair of the Seawall that protects Sharp Park's seaside links from the ocean. That would obviously condemn Sharp Park Golf Course, and it would be unacceptable.

The architectural significance of the seaside links class of golf course, and of Dr. MacKenzie's architecture, was described in a letter, dated March 26, 2015 to the California Coastal Commission from the Northern California Golf Association. We have attached a copy of that letter to our own, and we incorporate its comments by this reference.

San Francisco has, since the early 1990's, made laudable effort, at considerable trouble and expense, to simultaneously preserve the historic, architectural, and recreational values at Sharp Park Golf Course, while

San Francisco has, since the early 1990's, made laudable effort, at considerable trouble and expense, to simultaneously preserve the historic, architectural, and recreational values at Sharp Park Golf Course, while enhancing habitat for protected species at the property. Given these efforts, it now would be well beyond folly to simply stop maintaining and repairing the seawall that protects this great public asset.

Accordingly, the Alister Mackenzie Society, on behalf of its member clubs around the world, urges your agencies to take no steps, and propound no plans or recommendations, to prohibit maintenance and repair of the Sharp Park Seawall.

Respectfully submitted,

Eugene A. Zanardi, MacKenzie Society Director and Past President

encl.

cc: Ed Lee, Mayor, City and County of San Francisco  
Dennis Herrera, San Francisco City Attorney  
Senator Diane Feinstein  
Congresswoman Jackie Speier  
London Breed, President, San Francisco Board of Supervisors  
State Senator Jerry Hill  
Assemblyman Kevin Mullin  
San Mateo County Board of Supervisors  
Pacifica City Council  
Pacifica City Manager Lori Tinfow  
Van O'Campo, PE, Pacifica Dept. of Public Works  
Mark Buell, President, SF Recreation and Park Commission  
Philip Ginsburg, General Manager, SF Recreation & Park Dept.  
Lisa Wayne, Natural Areas Coordinator, SF Rec & Park Dept.  
John Maltbie, County Manager, County of San Mateo  
Marlene Finley, Director, San Mateo County Parks Dept.  
Hilary Papendick, San Mateo County Office of Sustainability  
John Dingler, USACE  
Kearns & West  
Kevin Heaney, Ex. Dir., Southern California Golf Association  
Jeff Volosing, President, Sharp Park Golf Club  
Lisa Villasenor, Captain, Sharp Park Business Women's Golf Club  
Mike Davis, Exec. Dir., U.S. Golf Association  
Steve Mona, Exec. Dir., World Golf Foundation  
Nick Zwick, President, Alister MacKenzie Foundation  
San Francisco Public Golf Alliance



February 8, 2016

Coastal Sediment Management Workgroup  
Suzan M. Ming, Project Manager  
U.S. Army Corps of Engineers  
911 Wilshire Blvd.  
Los Angeles, CA. 90017

Clifton Davenport, Project Manager  
California Geological Survey  
135 Ridgeway  
Santa Rosa, CA. 95401

**Re: SF Littoral Cell CRSMP Draft Plan, January, 2016  
San Francisco Public Golf Alliance Objects to Management Options  
That Would Prohibit Maintenance and Repair of the Sharp Park Seawall**

Dear CSMW,

**EXECUTIVE SUMMARY**

Sharp Park is a beautiful and complex coastal property, owned by San Francisco, and located in Pacifica. It is the site of an historic and popular municipal golf course, and the Laguna Salada freshwater wetlands that are habitat for endangered species. It borders two Pacifica residential neighborhoods—West Fairway Park and Clarendon Road. All of these are protected from the Pacific Ocean by the Sharp Park Seawall.

San Francisco is mandated by the US Army Corps of Engineers and a 2012 US Fish and Wildlife Service Biological Opinion and Incidental Take Statement, to maintain the

seawall and keep it in good repair. When the California Coastal Commission in 2015 granted a Coastal Development Permit for a San Francisco project to enhance the habitat and improve the flood-prevention pumping system at Sharp Park, the Commission expressly rejected a demand from project opponents to impose a “managed retreat” condition on the seawall.

On January 4, 2016, the interagency California Coastal Sediment Management Workgroup—perhaps somehow unaware of these prior resource agencies’ rulings—promulgated, as a policy-framing and guidance document, the “San Francisco Littoral Cell Coastal Regional Sediment Management Plan, Draft, 2016” (the “Draft Plan”). This Draft Plan proposes four “management alternatives” for the Sharp Park Seawall--three of which, clearly preferred by the Draft Plan’s drafters--would prohibit maintenance and repair of the seawall.

But mandatory non-maintenance and non-repair of the Sharp Park Seawall does not belong on any list of “management options,” because it would imperil the golf course, the neighborhoods, and the species, it would violate the conditions of the Incidental Take Statement and the Corps of Engineers permit, and invoke Endangered Species Act violations.

Incongruously, the same “Conceptual Ecosystem Restoration Plan” on which environmental groups Wild Equity Institute and Center for Biological Diversity (CBD) relied in their unsuccessful opposition to the USFWS 2012 Biological Opinion and Incidental Take Statement and the 2015 Coastal Commission permit, is now cited by the Draft Plan as authority for the three proposed “management alternatives” that would prohibit maintenance and repair of the seawall. ESA-PWA and Peter Baye PhD were authors of that “Conceptual Ecosystem Restoration Plan,” as consultants to Wild Equity and CBD. These same consultants, ESA-PWA and Dr. Baye, are also key drafters of the Draft Plan.

More than that, at Sharp Park, the Draft Plan is clearly incomplete and riddled with errors and information gaps. The Draft Plan’s cost-benefit analyses ignore the Sharp Park Golf Course and its infrastructure and commercial business and the recreational values of moderately-priced public recreation, and the security of the adjoining neighborhoods. The Draft Plan even denies that the protected species are “immediately at risk” at Sharp Park.

So, at least as to Sharp Park, the San Francisco Public Golf Alliance submits that the Draft Plan is unreliable and unsuitable as a policy-framing and guidance document.

## **I. INTRODUCTION:**

### **The Draft Plan is Fatally Flawed at Sharp Park. The Plan’s Preference For Letting the Seawall Erode Disregards the Facts, the Law, and Orders From the Lead Resource Agencies, Including the Corps of Engineers.**

In its opening paragraph, the CSMW Draft Plan for the San Francisco Open Coast Littoral Cell (the “Draft Plan”) describes its purpose to “. . . frame policy and guidance strategies . . . focus[ing] on coastal stretches where mitigating existing and expected future coastal erosion and other co-objectives – e.g., ecology, recreation, and protection of property and infrastructure – is or will be crucial for their survival.”<sup>1, 2</sup>

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<sup>1</sup> San Francisco Littoral Cell Coastal Regional Sediment Management Plan, Draft-January 2016, at page 1 [http://www.sfestuary.org/wp-content/uploads/2015/11/Draft\\_SFLC\\_CRSMW\\_20160104.pdf](http://www.sfestuary.org/wp-content/uploads/2015/11/Draft_SFLC_CRSMW_20160104.pdf)

<sup>2</sup> The Draft Plan’s Appendices are found at the following link: [http://www.sfestuary.org/wp-content/uploads/2015/11/SFLC\\_CRSMW\\_Appendices\\_Jan2016.pdf](http://www.sfestuary.org/wp-content/uploads/2015/11/SFLC_CRSMW_Appendices_Jan2016.pdf).

But glaring flaws in the Draft Plan -- at least with respect to Sharp Park, which is the subject of this comment letter -- render the Draft Plan, in its current form, unfit for its stated purpose.

First, the Draft Plan contains a host of critical gaps, outdated information<sup>3</sup>, and other errors, which together form the basis for the Draft Plan's "No Action" and "Managed Realignment" options<sup>4</sup>--purposeful strategies prohibiting maintenance and repair, thus ultimate elimination of the Sharp Park seawall.

Second, the Draft Plan has a blind spot for the recreational, commercial, touristic, architectural, and environmental assets and values of the historic Alister MacKenzie-designed Sharp Park Golf Course. Consequently, the Draft Plan's Coastal Policy Analysis Appendix<sup>5</sup>, at-risk property inventories<sup>6</sup>, and cost/benefit analyses<sup>7</sup> do not address or account for or value the public infrastructure and private and natural resources jeopardized by the Draft Plan's "managed realignment" and "No Action" options. **(See the discussion at Sections VI and VII of this letter, starting at page 13, below.)**

Third, the Draft Plan's purposeful prohibitions of maintenance and repair of the seawall are based upon its Biological Assessment<sup>8</sup>, which advocates a strategy for the seawall to erode, the shoreline to "retreat", and the golf course to flood.<sup>9</sup> The Draft Plan fails to account for -- or even to acknowledge -- potentially devastating impacts on federally-protected endangered species that would result directly from such purposeful erosion and ultimate failure of the seawall. The Laguna Salada pond and wetland complex, immediately adjacent to the Sharp Park seawall, provides habitat for the California red-legged frog and San Francisco garter snake, which are protected under the Endangered Species Act. These species' presence has already, and very recently, caused the US Fish and Wildlife Service, Army Corps of Engineers, California Coastal Commission, and San Francisco Bay Regional Water Quality

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<sup>3</sup> Though the Draft Plan's date-note (bottom of each page) says August, 2015, it appears -- from obviously outdated information that appears throughout the document -- that much of the research and drafting was done before 2013. For instance: (1) 2013 Present Value calculations appear in the Economic Analysis Appendix F, as well as the Draft Plan's Alternatives Summaries (at Figures 13-20); (2) the Coastal Policy Appendix cites an outdated 2012 draft version of the Pacifica Local Coastal Land Use Plan.

<sup>4</sup> The Draft Plan's management options for Sharp Park are described in Section 5.1 "Measures and Alternatives" and Table 13 "Detailed Description of Alternatives for Shore Reaches" (Draft Plan, at pages 49-50 and 53), and charted at Figure 18, "Sharp Park Summary" (Draft Plan, at Page 63). Three of the four Sharp Park management options -- the "Managed Realignment" options of Alternatives 1 and 2, and the "No Action" option of Alternative 4 -- entail letting the Sharp Park seawall erode and the shoreline to move landward. Only one of these listed "strategies"—Sharp Park Alternative 3, "Hold the Line," allows maintenance and repair of the existing seawall.

<sup>5</sup> The Draft Plan's Coastal Policy Analysis is found at Appendix D, supra (footnote 2)

<sup>6</sup> The Draft Plan's at-risk asset inventories are found in Tables 11 and 14, at pages 48 and 56 of the Draft Plan, and at Appendix F-1, the Units at Risk" table, Appendices, supra (footnote 2).

<sup>7</sup> The Draft Plan's cost-benefit analysis charts and tables are found at: Table ES-1 Summary of Net Economic Benefits, at page ix; Table ES-2 Summary of Economic Impact, at page x; Figure 18, Sharp Park Results Summary, at page 63; and the Economic Analysis, Appendix F, at Sharp Park etc. Table F-9, at page F-16

<sup>8</sup> Draft Plan, supra, at page ix; and Appendix C / Biological Assessment, supra (footnote 2).

<sup>9</sup> Appendix F, Biological Assessment, supra (at footnote 2), at the unnumbered 22<sup>nd</sup> to 24<sup>th</sup> pages, under the subhead "Sharp Park". (True copies of cited pages are attached hereto as Exhibit 1.)

Control Board to require that the seawall be maintained as part of a San Francisco plan to enhance habitat for the species. **(See the discussion at Sections III, IV, and V of this letter, starting at page 6, below.)**

Fourth, the Draft Plan fails to account for – or even identify – the impacts which its recommended seawall erosion plan would have on public health and safety, and public and private property and infrastructure, including parks, streets, and residential neighborhoods. **(See the discussion at Sections VI and VII of this letter, starting at pages 14 and 16, below.)**

One explanation of the Draft Plan’s problematic Sharp Park analysis may be the relationship that two key members of the drafting team – Bob Battalio of ESA-PWA and Peter Baye – have had with a long and unsuccessful campaign to close Sharp Park Golf Course by certain environmental groups led by Center for Biological Diversity and Wild Equity Institute. These efforts have been rejected by four different courts from 2012-2015. **(See the discussion at Sections III, IV, V, and VIII—at page 20--below.)**

By this letter, the 6,500-plus member San Francisco Public Golf Alliance respectfully requests that CSMW: (1) correct mistakes and add critical missing information about Sharp Park to its Final Plan and Appendices (as set out in the following sections of this letter), and (2) eliminate the “No Action” and “managed realignment” alternatives from, and add “beach nourishment—not subject to managed realignment” to, the Draft Plan’s list of Sharp Park mitigation alternatives.

## **II. Background: Sharp Park is a Significant Recreational, Historical, And Environmental Resource Property.**

Sharp Park Golf Course, opened in 1932, is a San Francisco-owned seaside public golf links designed by preeminent architect Dr. Alister MacKenzie<sup>10</sup>, and often called “The Poor Man’s Pebble Beach”. It is located immediately adjacent to the Sharp Park seawall, and is: (1) one of the most reasonably-priced golf courses in the Bay Area<sup>11</sup>; (2) San Francisco’s most heavily-played municipal course<sup>12</sup>; (3) recognized by the San Francisco Planning Department as an “historic resource” under the California Environmental Quality Act

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<sup>10</sup> Dr. MacKenzie was the first golf architect inducted into the World Golf Hall of Fame, and was the architect of several of the world’s most highly-esteemed courses, including Augusta National (home of the annual Masters Tournament) and the Cypress Point Club at Monterey, CA. World Golf Hall of Fame, “Alister MacKenzie”: <http://www.worldgolfhalloffame.org/alister-mackenzie/> (Copy attached as **Exhibit 2**.) Sharp Park is one of only a handful of municipal courses in the world built by Dr. MacKenzie, and his only public seaside links.

<sup>11</sup> A chart compiled by the San Francisco Recreation and Park Department and presented in November, 2009 to the Park, Recreation, and Open Space Advisory Committee – the Department’s citizens’ advisory committee – shows that Sharp Park’s greens fees are among the very lowest for 18-hole public courses in the San Francisco Bay Area. San Francisco Recreation & Park Department, Chart: <https://dl.dropboxusercontent.com/u/30028085/SFRPD.Survey.Bay.Area.Golf.Fees.2009.pdf>. (Copy attached as **Exhibit 3**.)

<sup>12</sup> In Fiscal Year 2013-2014, 45,622 18-hole rounds were played at Sharp Park, more than at any of the city’s other municipal courses. See SF Rec & Park Department, Golf Revenue & Expenditure Report, for FY 13-14: <https://dl.dropboxusercontent.com/u/30028085/%2713-%2714%20Actuals.pdf> (Copy attached as **Exhibit 4**.)

(CEQA)<sup>13</sup>; (4) designated an “historic site” by the City of Pacifica General Plan<sup>14</sup> and by the Pacifica Historical Society<sup>15</sup>; (5) designated a nationally-significant “At-Risk Cultural Landscape” by the Washington D.C.-based Cultural Landscape Foundation<sup>16</sup>; and (6) recognized by Golfweek magazine as one of the 50 “Best Municipal Courses” in America.<sup>17</sup> The County of San Mateo<sup>18</sup>, the cities of Pacifica<sup>19</sup> and San Bruno,<sup>20</sup> and the Chambers of Commerce of both San Francisco<sup>21</sup> and Pacifica<sup>22</sup> have all urged that Sharp Park Golf Course be preserved.

In addition to public golfers, Sharp Park provides habitat for the federally-protected California red-legged frog and endangered San Francisco garter snake, freshwater species which inhabit the Laguna Salada pond and wetlands complex adjacent to some of the fairways. These species are protected by the seawall from the threat of saltwater inundation – and also protected under the Endangered Species Act.

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<sup>13</sup> San Francisco Planning Dept., Historic Resource Evaluation Response (“HRER”), February 15, 2011, at Page 2: [https://dl.dropboxusercontent.com/u/30028085/SF\\_Planning\\_Dept\\_Historic\\_2\\_8\\_2011.pdf](https://dl.dropboxusercontent.com/u/30028085/SF_Planning_Dept_Historic_2_8_2011.pdf) (Copy attached as **Exhibit 5**.)

<sup>14</sup> The golf course is designated a Pacifica “Historic Site” in the Pacifica General Plan, Historic Preservation Element and Historic Sites Map, at pages 95 and 95a. (Copy attached as **Exhibit 6**.) <http://www.cityofpacific.org/civica/filebank/blobload.asp?BlobID=3443>.

<sup>15</sup> The City of Pacifica’s official historian, the Pacifica Historical Society, by Resolution dated June 14, 2011, designated Sharp Park Golf Course a Pacifica “historical and cultural resource”: [https://dl.dropboxusercontent.com/u/30028085/Pacific\\_Historical\\_Society\\_Resolution\\_6-14-11.pdf](https://dl.dropboxusercontent.com/u/30028085/Pacific_Historical_Society_Resolution_6-14-11.pdf) (Copy attached as **Exhibit 7**.)

<sup>16</sup> Cultural Landscape Foundation, “Sharp Park Golf Course Threatened With Closure,” About TCLF, At Risk Landscapes: <http://tclf.org/landslides/sharp-park-golf-course-threatened-closure> ; <http://tclf.org/about>; <http://tclf.org/landslide/about> (Copies attached as **Exhibit 8**.)

<sup>17</sup> Golfweek, Best Municipal Courses (2014)(Sharp Park rated No. 50): (Copy attached as **Exhibit 9**.) <http://golfweek.com/news/2014/jun/25/golf-courses-municipal-golfweeks-best-travel/>

<sup>18</sup> San Mateo County Board of Supervisors, Resolution G69145, December 18, 2007: [http://sharppark.savegolf.net/data/smbos\\_res.pdf](http://sharppark.savegolf.net/data/smbos_res.pdf) (Copy attached as **Exhibit 10**.)

<sup>19</sup> Pacifica City Council, Resolution 63-2007, December 10, 2007: [http://sharppark.savegolf.net/data/cop\\_res.pdf](http://sharppark.savegolf.net/data/cop_res.pdf) (Copy attached as **Exhibit 11**.)

<sup>20</sup> Letter, San Bruno Mayor Jim Ruane to Hon. Ed Lee, Dec. 22, 2011: (Copy attached as **Exhibit 12**.) [https://dl.dropboxusercontent.com/u/30028085/12-22-11\\_Mayor\\_Ruane\\_Letter.pdf](https://dl.dropboxusercontent.com/u/30028085/12-22-11_Mayor_Ruane_Letter.pdf)

<sup>21</sup> Letter, San Francisco Chamber of Commerce Sr. Vice President Jim Lazarus to Hon. Ed Lee, Dec. 14, 2011 (Copy attached as **Exhibit 13**.) [https://dl.dropboxusercontent.com/u/30028085/Chamber\\_of\\_Commerce\\_SaveSharpPark.pdf](https://dl.dropboxusercontent.com/u/30028085/Chamber_of_Commerce_SaveSharpPark.pdf)

<sup>22</sup> Letter, Pacifica Chamber of Commerce to Pacifica Mayor Mary Ann Nihart, March 26, 2011: <https://dl.dropboxusercontent.com/u/30028085/Pacific.CofC.ltr.SFMayor.3.26.11.Sh.Pk..pdf> (Copy attached as **Exhibit 14**.)

### III. San Francisco has for Years Worked with the Lead Resource Agencies To Balance Recreational and Environmental Goals at Sharp Park, and San Francisco's Plan has repeatedly been upheld by the Courts.

Responding to environmental concerns, San Francisco and the California Coastal Conservancy in 1992 commissioned Philip Williams & Associates (PWA) to prepare the Laguna Salada Resource Enhancement Plan. PWA recommended an approach to "manage public access to promote views of the site and use which is compatible with the natural resource values of the site and with the golf course operation."<sup>23</sup> PWA's plan included habitat enhancement for the frogs and snakes, pumping to manage water levels and quality, dredging tules from ponds and wetlands, maintaining the Sharp Park seawall to protect the freshwater wetlands from the ocean, and developing a recycled water irrigation source.

PWA found that erosion of an old seawall in 1983, followed by overtopping of the eroded remnant seawall in 1986, caused high salinity in the lagoon and decimated Sharp Park's endangered snake and frog populations. So PWA urged that the seawall be maintained:

"Severe flooding occurred in 1983 and 1986. During the 1983 event, sand and seawater washed over the low seawall, . . . In 1986, severe rainstorms, combined with high tides and wave overwash, again caused extensive flooding. . . Following the 1986 flooding, salinity measurements were made in the Laguna and the Horse Stable Pond. . . These salinities were apparently sufficiently high to eliminate or reduce [California red-legged frog] populations and consequently impact the [San Francisco garter snake]. Since the completion of the current seawall in 1989, no wave overwash has occurred, and salinities have dropped to the low levels . . . (Page 11)

"Seawater flooding has had . . . serious consequences for wildlife, particularly the [California red-legged frog] and [San Francisco garter snake]. Prevention of high salinity levels is justified for the preservation of these species. The newly-constructed seawall will dramatically reduce seawater flooding. . . The long-term stability of the seawall is obviously crucial to the prevention of salinity intrusion and sand transport to the ponds. . . We are assuming that the seawall will be maintained in perpetuity by the City. If this were not done, . . . conditions for endangered species would deteriorate." (Pages 40-41.)<sup>24</sup>

In November, 2009, following a six-month study by its consultant Tetra-Tech, the San Francisco Recreation and Park Department released its Sharp Park Conceptual Alternatives Report<sup>25</sup>, which updated the PWA 1992 report, and recommended habitat

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<sup>23</sup> Philip M. Williams Associates, 1992, "Laguna Salada Resource Enhancement Plan: <https://dl.dropboxusercontent.com/u/30028085/SFPGA.PWilliams.Laguna.Salada.Plan.1992f.pdf> (Copies of relevant pages are attached hereto as **Exhibit 15**.)

<sup>24</sup> *Id.*, at pages 11, 40-41. (Copies of cited pages are attached hereto as **Exhibit 15**.)

<sup>25</sup> Tetra-Tech, Sharp Park Conceptual Alternatives Report, November, 2009: [http://sfmea.sfplanning.org/2005.0912E\\_DEIR6.pdf](http://sfmea.sfplanning.org/2005.0912E_DEIR6.pdf) (at pages 4-5 46-47, and 59-60) (Copies of cited pages attached as **Exhibit 16**.) This November, 2009 Report updated the PWA 1992 Plan (see footnotes 16 and 23, *supra*, and **Exhibit 15**).

recovery measures together with preservation of the historic 18-hole golf course. Although there was opposition from some quarters to keeping the golf course open<sup>26</sup>, the Recreation and Park Commission on December 17, 2009 voted unanimously in December, 2009 in favor of the Tetra-Tech plan to recover habitat while preserving the golf course.<sup>27</sup>

In October, 2014, a new \$10 Million recycled water delivery system—a joint venture of San Francisco PUC and Pacifica’s North Coast County Water District—was hooked-up to deliver recycled water from Pacifica’s Calera Creek water treatment plant to irrigate the Sharp Park Golf Course.<sup>28</sup> Known as the Pacifica Recycled Water Project, and designed to deliver 78% of its capacity to the golf course,<sup>29</sup> the project was initially funded with a planning grant from the State Water Resources Control Board, and was in the pipeline since the late 1990’s.<sup>30</sup>

In 2011, San Francisco applied to the Army Corps of Engineers for a permit for the Sharp Park Safety, Infrastructure Improvement, and Habitat Enhancement Project (“Pump House Project”), which included partial dredging of the ponds and a connecting channel, plus worker safety and other improvements to the golf course’s flood-control pumping system.<sup>31</sup> As required by Section 7 of the Endangered Species Act, the Corps engaged in a formal consultation with the US Fish and Wildlife Service (USFWS) regarding the potential effects of the project on the protected California red-legged frog and endangered San Francisco garter snake. In turn, the USFWS issued its Biological Opinion on the project on October 2, 2012.<sup>32</sup> The jeopardy assessment section of the Biological Opinion includes the following findings:

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<sup>26</sup> Center for Biological Diversity on August 19, 2009 issued a press release calling for closure of the golf course <https://dl.dropboxusercontent.com/u/30028085/CBD.Prs.Rls.re.Scientist.Ltr.Sh.Pk.8.19.09.pdf>. The press release announced and enclosed a “scientists” letter, also dated August 19, 2009, to Rec and Park General Manager Phil Ginsburg. The first two signatories of this letter were Bob Battalio and Peter Baye. <https://dl.dropboxusercontent.com/u/30028085/CBD.Scientists.Ltr.Sh.Pk.8.19.20.pdf> (True copies of the CBD press release and the “scientists” letter are attached hereto as **Exhibit 17**.)

<sup>27</sup> San Francisco Recreation and Park Commission Minutes, Dec. 17, 2009, Agenda Item No. 11 (at p. 18), Resolution No. 0912-018: (Copies of relevant pages attached as **Exhibit 18**.) [https://dl.dropboxusercontent.com/u/30028085/SharpParkRPDCommissnMinutes121709\\_00000.pdf](https://dl.dropboxusercontent.com/u/30028085/SharpParkRPDCommissnMinutes121709_00000.pdf)

<sup>28</sup> Pacifica Tribune, Nov. 4, 2014, “Recycled Water Now Used on Sharp Park...”: [http://www.mercurynews.com/pacifica/ci\\_26864797/recycled-water-now-used-sharp-park-golf-course](http://www.mercurynews.com/pacifica/ci_26864797/recycled-water-now-used-sharp-park-golf-course) (Copy attached as **Exhibit 19**.)

<sup>29</sup> San Mateo County Times, July 8, 2009, “Pacifica Golf Course, Parks, to Use Recycled Water”: [http://www.insidebayarea.com/sanmateocountytimes/localnews/ci\\_12787178](http://www.insidebayarea.com/sanmateocountytimes/localnews/ci_12787178) (Copy attached as **Exhibit 20**.)

<sup>30</sup> Kennedy/Jenks Consultants, “Pacifica Recycled Water Project Facilities Planning Report, December, 2004, at Cover Letter, Dec. 20, 2004 and Pages 1, 23-25. (Copies of cited pages enclosed as **Exhibit 21**.) <http://www.sfwater.org/modules/showdocument.aspx?documentid=2481>

<sup>31</sup> See the Project Description at pages 5-6 of the US Fish and Wildlife Service (USFWS) Biological Opinion Letter, October 2, 2012 (*infra*, at footnote 32). (Copies of cited pages are attached as **Exhibit 22**.) <https://dl.dropboxusercontent.com/u/30028085/USFWS%20BiOp.pdf>

<sup>32</sup> Biological Opinion Letter, US Fish and Wildlife Service (USFWS), October 2, 2012 <https://dl.dropboxusercontent.com/u/30028085/USFWS%20BiOp.pdf> (Copies of cited pages are attached as **Exhibit 22**.)

“In coastal lagoons, the most significant mortality factor in the pre-hatching stage [of California red-legged frogs] is water salinity. . . Eggs exposed to salinity levels greater than 4.5 parts per thousand resulted in 100 percent mortality. . . (page 22); there are two significant components to San Francisco garter snake habitat: ponds that support California red-legged frogs and Pacific tree frogs. . . San Francisco garter snakes forage extensively in aquatic habitats. . . The elimination of aquatic habitat used by the anuran prey base of the San Francisco garter snakes. . . negatively impacts the San Francisco garter snakes by removing both its pretty and suitable habitat. . . (page 25); . . . Little is known about the status of San Francisco garter snake and California red-legged frog in the action area prior to the construction of Sharp Park Golf Course in 1932. The species were first documented in the action area in 1946. . . San Francisco garter snake and California red-legged frog habitat at Laguna Salada was compromised several times in the 1970s and 1980s due to breaching of the dunes during winter-storm events and subsequent inundation by sea water. . . In 1987, the seawall at Sharp Park failed, allowing the intrusion of salt water into Laguna Salada. These salt water intrusion events likely resulted in a decline in the San Francisco garter snake population in Laguna Salada. (page 28); If the amount of saline intrusion and overall salinity of Laguna Salada and Horse Stable Pond increase beyond the tolerance of California red-legged frogs then frog mortality may occur and neither water body would continue to function as habitat for the frog (as was seen in 1983 when the seawall failed allowing intrusion of salt water into Laguna Salada increasing salinity and eliminating frogs from Laguna Salada...)” (Page 34)<sup>33</sup>

The Biological Opinion Letter concluded that the Pump House Project – subject to 32 enumerated Conservation Measures “to minimize [the Project’s] potential effects on the listed species or their habitat” (Id., at page 10) – “is not likely to jeopardize the continued existence of the California red-legged frog or San Francisco garter snake” (Id., at page 38). One of these, Conservation Measure 31, requires San Francisco to “maintain and keep in good repair” the Sharp Park seawall road (necessarily including the roadbed, which is the seawall itself):

[Conservation Measure] 31. During and following completion of the Project, the SFRPD shall maintain and keep in good repair the sea wall road, which provides the only vehicle access for maintenance activities as described above. Maintenance of the roadway on the sea wall is expected to include filling ruts in the surface with aggregate or comparable materials and repairing drainage issues by outsloping the roadbed. The SFRPD does not anticipate hardening or further armoring of the sides of the sea wall.” (Id., Page 19)

The USFWS then, in the same document as the Biological Opinion, issued an Incidental Take Statement under Section 7(b)(4) and Section 7(o)(2) of the Endangered Species Act, which adopted all of the Conservation Measures, and mandated both the City and the Corps of Engineers to implement and ensure compliance with all of them.<sup>34</sup>

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<sup>33</sup> Biological Opinion Letter, Id. (copies of cited pages are attached as **Exhibit 22.**)

<sup>34</sup> Biological Opinion Letter, Id., including Incidental Take Statement (at page 41, Terms and Conditions No. 1), approving the Pump House Project, subject to Conservation Measures. (Copies of relevant pages are attached as **Exhibit 22.**)

Following the issuance of the Biological Opinion by the USFWS, U.S. District Court Judge Susan Illston on December 6, 2012 dismissed a lawsuit to enjoin golf at Sharp Park, brought under the Endangered Species Act by environmentalist groups led by Wild Equity Institute and Center for Biological Diversity. Judge Illston ruled that the lawsuit was mooted by the Biological Opinion and Incidental Take Statement.<sup>35</sup> Judge Illston's dismissal was upheld on March 25, 2015, when the U.S. Court of Appeals for the Ninth Circuit dismissed the appeal.<sup>36</sup>

After unanimous approvals in January, 2014 by both the San Francisco Planning and Recreation and Park Commissions, the San Francisco Board of Supervisors on March 25, 2014 approved the Pump House Project.<sup>37</sup> Wild Equity and Center for Biological Diversity then brought a Writ of Mandamus in San Francisco Superior Court, alleging that the Supervisors' approval violated the California Environmental Quality Act. This lawsuit, too, was dismissed on May 28, 2015, following trial by Superior Court Judge Garrett Wong.<sup>38</sup>

The Pump House Project required – and received – permits and approvals from the federal and state resource agencies: (1) The Army Corps of Engineers on February 5, 2014 granted a Clean Water Act Section 404 permit<sup>39</sup>; (2) the San Francisco Bay Regional Water Quality Control Board on June 25, 2014 issued a Clean Water Act Section 401 Certification<sup>40</sup>. The Corps of Engineers and the RWQCB expressly conditioned their approvals on full compliance with the Incidental Take Statement and all of its terms and conditions. The California Coastal Commission approved a Coastal Development Permit for the project on April 16, 2015.<sup>41 42</sup>

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<sup>35</sup> *Wild Equity Institute, Center for Biological Diversity, et al. vs. City and County of San Francisco*, U.S. Dist.Ct., N.D. California, No. C 11-00958 SI; Order Granting Defendants' Motion to Dismiss, etc., Dec. 6, 2012: <https://dl.dropboxusercontent.com/u/30028085/Sharp.Park.Order.Dismissal.12.6.12.pdf> (Copy attached as **Exhibit 23**.)

<sup>36</sup> *Wild Equity Institute, Center for Biological Diversity, et al. vs. City and County of San Francisco*, U.S. Court of Appeals for the Ninth Circuit, No. 13-1546, Memorandum [Order Dismissing Appeal], March 25, 2015: <http://cdn.ca9.uscourts.gov/datastore/memoranda/2015/03/25/13-15046.pdf> (Copy attached as **Exhibit 24**.)

<sup>37</sup> San Francisco Board of Supervisors, March 25, 2014, Motion No. M14-039: <https://sfgov.legistar.com/View.ashx?M=F&ID=2952903&GUID=29926E90-097F-4F34-BFE1-26579EE3DCBB> (Copy attached as **Exhibit 25**.)

<sup>38</sup> *Wild Equity Institute, et al. vs. City and County of San Francisco*, San Francisco Superior Court No. CPF 14-513613, Order Denying Writ of Mandate, May 28, 2015 (Copy attached as **Exhibit 26**.) <https://dl.dropboxusercontent.com/u/30028085/SFPGA.SFSup.Ct.Wld.Eq.Dismiss.Jn.1.15.pdf>

<sup>39</sup> Letter, February 5, 2014, U.S. Army Corps of Engineers to San Francisco Recreation and Park Department ("Corps of Engineers letter"), at page 3, Special Condition 1. <https://dl.dropboxusercontent.com/u/30028085/SharpPark.Corps.Eng%27rs.Permit.2.5.14.pdf> (True copy attached hereto as **Exhibit 27**.)

<sup>40</sup> San Francisco Bay RWQCB, CWA Section 401 Certification letter, June 25, 2014, at page 9, Gen. Condition 3. <https://dl.dropboxusercontent.com/u/30028085/RWQCB.Sh.Pk.Certif%27n.6.25.14.pdf> (True copy attached hereto as **Exhibit 28**.)

<sup>41</sup> California Coastal Commission, Permit 2-12-014, June 2, 2015: <https://dl.dropboxusercontent.com/u/30028085/SFPGA.Sh.Pk.Coast.Comm.CDP.6.2.15.pdf> (A true copy is attached hereto as **Exhibit 29**.)

Wild Equity next sued the Coastal Commission, to block the Coastal Development Permit for the Pump House Project. But after San Mateo County Superior Court Judge George Miram on August 20, 2015 denied its motion for preliminary injunction, Wild Equity dismissed the lawsuit on October 9, 2015.<sup>43</sup> San Francisco completed work on the Pump House Project in late October, 2015.

#### **IV. The Draft Plan Must Avoid Strategies Which Would Prohibit Maintenance And Repair of the Sharp Park Seawall, Thus Inviting Violations Of the Endangered Species and Clean Water Acts.**

As discussed above in Section III, the USFWS Biological Opinion and the 1992 PWA study well-document the disastrous effects in the 1980's of seawall erosion and resultant saltwater flooding on the frogs and snakes in Sharp Park's freshwater ponds and wetlands. And the USFWS' Incidental Take Statement -- incorporated into the Corps' Section 404 Permit and the RWQCB's Section 401 Certification -- requires the Corps of Engineers, as well as San Francisco, to abide by all terms and conditions of the Incidental Take Statement -- including the Conservation Measure 31 to maintain and repair the seawall road.

The Draft Plan charts four "management options" for the Sharp Park seawall. Descriptions of these option in the Draft Plan make clear that maintenance and repair of the seawall would be allowed under only one these, called "Hold the Line," which is defined as follows: "Hold the Line—This measure consists of coastal armoring, including maintaining existing armoring (e.g., seawalls, revetments) where it currently exists." (Draft Plan, supra [footnote 1], at page 49.) The other three options--Nos. 1 and 2 ("managed realignment"), and "No Action" would not allow maintenance or repair of the seawall, but would instead purposefully let it erode.<sup>44</sup> These three strategies would clearly contradict the Incidental Take Statement for the Pump House Project, which is incorporated into both the Corps of Engineers' Section 404 Clean Water Permit and the RWQCB's Compliance Letter.

Under the Endangered Species Act, purposeful strategies of not maintaining and failing to "keep in good repair" the seawall so as to facilitate its erosion -- as reflected in the

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<sup>42</sup> California Coastal Commission, Staff Report, April 3, 2015 and Addendum April 15, 2015: <http://documents.coastal.ca.gov/reports/2015/4/th8a-4-2015.pdf> In its April 16, 2015 ruling granting the Permit for the Pump House Project, the Coastal Commission unanimously adopted the Staff Report and its findings. Id., April 3, 2015, at page 5. (A true copy of cited pages is attached hereto as **Exhibit 30.**)

<sup>43</sup> *Wild Equity Institute vs. California Coastal Commission*, San Mateo County Superior Court, No. CIV 534243: Order Denying Motion for Preliminary Injunction, etc., August 20, 2015: (True copy is attached as **Exhibit 31.**) <https://dl.dropboxusercontent.com/u/30028085/SFPGA.W.Eq.v.CCC.Order.Deny.Prelim.Injn.8.20.pdf> Request for Dismissal (Entered), October 9, 2015: (A true copy is attached hereto as **Exhibit 32.**) <https://dl.dropboxusercontent.com/u/30028085/SFPGAWEqvCCCDdismissal10915.pdf>

<sup>44</sup> The Draft Plan's management options for Sharp Park are charted at Figure 18, "Sharp Park Summary" (Draft Plan, at Page 63), and described in Section 5.1 "Measures and Alternatives" and Table 13 "Detailed Description of Alternatives for Shore Reaches" (Draft Plan, at pages 49-50 and 53). Only one of these listed "strategies"—Sharp Park Alternative 3, "Hold the Line," allows maintenance and repair of the existing seawall. All the other Sharp Park options described in the Draft Plan--the "Managed Realignment" Alternatives 1 and 2, and the "No Action" option of Alternative 4 -- entail letting the seawall erode and the shoreline to move landward. The Draft Plan expressly states, at page 53, that with "managed realignment," the "backshore [is] allowed to erode".

Draft Plan's "No Action" and two "managed realignment" strategies -- would result in unauthorized "take" of these federally-listed species, in violation of Section 9 of the Act. In addition, any action by any federal agency (such as the Corps of Engineers) to adopt or otherwise facilitate a strategy of allowing the seawall to erode "will affect" federally-listed species, thus triggering a legal obligation by the Corps to engage in formal consultation with USFWS under Section 7 of the Act. Finally, because the Incidental Take Statement is binding not only on San Francisco, but also on the Corps of Engineers, the Corps may not adopt, or take any part in adopting, an intentional erosion strategy for the Sharp Park seawall.

## V. The Resource Agencies Have Specifically Considered – and Rejected – The Rationale of the Draft Plan's Seawall Erosion Strategies for Sharp Park.

The Draft Plan explains in its Biological Assessment, Appendix C, the rationale for its proposed strategies to prohibit maintenance and repair of the seawall. Citing a report entitled "Conceptual Ecosystem Restoration Plan and Feasibility Assessment for Laguna Salada"<sup>45</sup>, the Biological Assessment Appendix summarizes:

"Maintenance of the existing artificial berm prevents barrier retreat . . . Combining a lower barrier crest elevation (replacement of the artificial berm with a modular ground-level or low-elevation boardwalk behind the barrier crest) and beach nourishment would promote constructive profile responses to extreme storm overwash events. . . It would also be compatible with increased retention of freshwater inflows, allowing lagoon levels to rise to natural supratidal elevation range. . ."<sup>46</sup>

In other words, the Draft Plan's Biological Assessment proposes to let the seawall erode away, and to reduce pumping at Laguna Salada so as to flood the existing golf fairways on the eastern side of the wetlands.

But when the lead federal and state resource agencies approved the Sharp Park Pump House Project, they clearly considered – and clearly rejected -- ESA-PWA's proposals to let the seawall erode and let the golf fairways flood. The USFWS' October 2, 2012

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<sup>45</sup> "ESA-PWA, 2011. Conceptual Ecosystem Restoration Plan and Feasibility Assessment, Laguna Salada, Pacifica, California. Prepared for Wild Equity Institute and Center for Biological Diversity."

<https://dl.dropboxusercontent.com/u/30028085/ESA-PWA.2011.Laguna.Salada.Plan%2C%202.10.11.pdf>

The title page of the "Conceptual Ecosystem Restoration Plan, etc." report identifies its authors as "ESA PWA with Peter Baye, PhD"; at page 46, the List of Preparers identifies Bob Battalio as the report's Project Director. The Executive Summary – the report's first, unnumbered page of text, describes key elements of the plan: "Key elements of the restoration design include reduction in pumping freshwater out of the system, resulting in significantly higher and seasonally fluctuating lagoon water levels and expansion of fresh- brackish marsh landward; expansion of seasonal wetland and upland transition zones; creation of more freshwater pond refuge habitat landward of the lagoon; . . . restoration of a natural sand outlet of the lagoon, and phased replacement of the armored shoreline levee road with a boardwalk that allows the beach to retreat and adjust to rising sea level." (Copies of the cited pages are attached hereto as **Exhibit 33**.)

<sup>46</sup> Draft Plan, Appendix C, Biological Assessment, at the 22<sup>rd</sup>, 23<sup>rd</sup>, and 24<sup>th</sup> unnumbered pages. (True copies of the cited pages from the Appendix C/Biological Assessment, are attached hereto as **Exhibit 1**.) The Draft Plan credits this Biological Assessment with "provid[ing] a general indication of impacts and benefits of the [Draft Plan's] array of erosion mitigation measures." Draft Plan (supra, footnote 2), Executive Summary, at p. xi.

Biological Opinion<sup>47</sup> includes in its list of Literature Cited, the ESA-PWA Conceptual Ecosystem Restoration Plan and a June, 2012 “Critical review” letter from Peter Baye.<sup>48</sup>

Likewise, in its April 16, 2015 ruling approving the Pump House Project, the California Coastal Commission approved the Project, including new larger pumps at the Pump House, and found, among other things, that the pumps “are for the purpose of maintaining the public golf course (page 23) . . . Denying the proposed project . . . would result in the continued flooding of the golf course, which over time may discourage its use and deprive low-income users of the opportunity to play golf with coastal views.” (Page 35) Expressly rejecting Wild Equity Institute’s argument that pump replacements and improved pumping efficiency are not needed at Sharp Park because the “least environmentally damaging alternative” would be to simply allow Laguna Salada’s water level to rise and flood much of the golf course,<sup>49</sup> the Commission noted that flooding would substantially impact the low-cost public golf recreational resource.<sup>50</sup> The Coastal Commission also expressly considered and rejected project opponents’ demands that the Commission impose a “managed retreat” condition on the Sharp Park seawall.<sup>51</sup>

It is worth here repeating that Wild Equity’s unsuccessful flood-the-golf-course-and let-the-seawall-erode arguments in the Pump House Project administrative proceedings were based upon the report, “Conceptual Ecosystem Restoration Plan and Feasibility Assessment for Laguna Salada, Pacifica, California,” authored by its paid consultants ESA-PWA and Peter Baye, PhD.<sup>52</sup> The same ESA-PWA and Peter Baye are named authors

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<sup>47</sup> Biological Opinion Letter, October 2, 2012, supra (footnote 32), at pages 19, 41: (Copies of cited pages are attached hereto as **Exhibit 22.**) <https://dl.dropboxusercontent.com/u/30028085/USFWS%20BiOp.pdf>

<sup>48</sup> Baye, P.R. 2012, Critical review of the biological assessment for the ‘Sharp Park Safety, Infrastructure Improvement and Habitat Enhancement Project’. Prepared for Wild Equity Institute, Oakland, California, June 2012”: <https://dl.dropboxusercontent.com/u/30028085/Sh.Pk.Baye.Jn.2012.Comment%20to%20USFWS.pdf> Mr. Baye’s “Critical Review” letter objects to pumping, and instead recommends: “cessation of mowing emergent perennial fresh-brackish marsh on the landward shore of the lagoon. . . It would require flooding only within wetlands that are mown to function as turfgrass (seasonal wetlands located within the annual floodplain of the lagoon), to flood. . . In effect, this alternative measure simply requires that the applicant cease mowing and draining existing wetlands that are seasonally occupied by CRLF and used as breeding habitat.” Id. at pages 9-10. (Copies of the cited pages are attached hereto as **Exhibit 34.**)

<sup>49</sup> California Coastal Commission, Staff Report, supra (footnote 42), April 3, 2015, at pages 23-24, and 35. <http://documents.coastal.ca.gov/reports/2015/4/th8a-4-2015.pdf> (Copies of cited pages attached hereto as **Exhibit 30.**)

<sup>50</sup> California Coastal Commission, Staff Report, Id., at page 35: “Project opponents suggest ‘conventional’ water depth management of the marsh and ponds. This entails raising the amount of water around the lower edges of tules and cattails from 2 to 4 feet deep to a minimum of 4 feet deep. . . Allowing this much water to accumulate would impact recreation substantially. . . Therefore, it is not a feasible alternative and results in recreational resource impacts.” (Copies of the cited pages are attached hereto as **Exhibit 30.**)

<sup>51</sup> California Coastal Commission, Staff Report, Id., Staff Report Addendum, April 15, 2015, at page 6, “Shoreline Protection” (Copies of the cited pages are attached hereto as **Exhibit 30.**)

<sup>52</sup> ESA-PWA, Peter Baye, et al., supra (footnote 45), “Conceptual Ecosystem Restoration Plan and Feasibility Assessment for Laguna Salada, Pacifica, California, at Cover Letter page 1, and Executive Summary: <https://dl.dropboxusercontent.com/u/30028085/ESA-PWA.2011.Laguna.Salada.Plan%2C%202.10.11.pdf> (True copies of cited pages are attached as **Exhibit 33.**)

of the Draft Plan, and their same Conceptual Ecosystem Restoration report is cited by the Draft Plan's Biological Assessment as support for the proposed management strategies to let the golf course flood and the seawall erode.<sup>53</sup>

Also significant is that the "Conceptual Ecosystem Restoration Plan" drafters, ESA-PWA and Dr. Baye, have their eyes on a much bigger target than just the Sharp Park seawall and Laguna Salada. They are looking at a highway project—a "wildlife corridor" feature for the anticipated future CalTrans Coast Highway project through Sharp Park. ". . . we identify a broader restoration objective for future consideration. The objective is to restore a connective corridor for the Sharp Park/Mori SFGS populations to the east side of HWY 1 and ultimately to Crystal Springs."<sup>54</sup> This would be a "SFGS corridor underpass or overpass of HWY 1 that provides protection, refuge, and safe passage for wildlife" (at page 28 and Figure 9), similar to the Doyle Drive approach to the Golden Gate Bridge. (Page 30) It would require "partnerships with CalTrans" (page 28) to achieve a highway project to remove the existing Highway 1 berm between Fairway Park and Sharp Park Road, and construct a tunnel or bridge to daylight the area around Sanchez Creek. "Consider the adverse effects to SFGS resulting from Highway One, and consider elements to mitigate these adverse effects as part of future Highway modifications." (Page 35.) A rendering of the "wildlife corridor" project appeared in a Sept. 24, 2015 release from ESA-PWA/Dr. Baye's client Wild Equity Institute.<sup>55</sup>

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<sup>53</sup> See Draft Plan Appendix C / Biological Assessment, at the 22<sup>nd</sup> and 23<sup>rd</sup> unnumbered pages. (True copies of relevant pages are attached hereto as Exhibit 1.) The Draft Plan credits this Biological Assessment with "provid[ing] a general indication of impacts and benefits of the [Draft Plan's] array of erosion mitigation measures." Draft Plan, Executive Summary, at p. xi.

<sup>54</sup> ESA-PWA, Peter Baye, et al., 2011, *supra*, "Conceptual Ecosystem Restoration Plan," etc., at page 37. <https://dl.dropboxusercontent.com/u/30028085/ESA-PWA.2011.Laguna.Salada.Plan%2C%202.10.11.pdf> (True copies of cited pages are attached as **Exhibit 33**.)

The proposed Highway 1 wildlife-bridge project is discussed at several points in the ESA-PWA 2011 report, including: "The restoration vision developed herein includes . . . a viable HWY 1 underpass or overpass specific to SFGS needs. (Page 26) . . . Connective corridor for SFGS and CRLF can be demonstrated in the future by seeking restoration opportunities and partners (e.g., Caltrans) to design either a HWY 1 underpasses or overpasses to promote genetic flow among populations." (Page 27) . . . HWY 1 east of Laguna Salada is a barrier to wildlife movement. Partnerships with Caltrans will need to be developed to secure a future SFGS corridor underpass or overpass of HWY 1 that provides protection, refuge, and safe passage for wildlife." (Page 28) . . . Adopt and identify the areas adjacent to and including Sanchez Creek as a future viable SFGS corridor that provides the potential for safe passage, either under or over road and HWY 1. Work towards finding additional funds and partnering with Caltrans. . . modifications to HWY 1 could greatly enhance restoration by reconnecting the ecotone on either side of the roadway. Highway One forms a barrier to wildlife (and people) which is a stressor to the natural east-to-west orientation of the coastal ridges and valleys. Figure 9 shows a connection across HWY 1 for SFRPD lands. . . We recommend that these considerations be incorporated in the HWY 1 planning. . . One example of a multi-objective roadway renovation project is the Doyle Drive Reconstruction in San Francisco, which includes elevated and depressed sections which will allow ecological and pedestrian connections from uplands to the shore. (Pages 29-30). . . Therefore, additional work is recommended to: . . . Consider the adverse effects to SFGS resulting from Highway One, and consider elements to mitigate these adverse effects as part of future Highway modifications." (Page 35)

<sup>55</sup> The proposed wildlife corridor is described, with a copy of Figure 9 from the Conceptual Ecosystem Restoration Plan, in a September 24, 2015 Wild Equity Institute press release (A true copy is attached as **Exhibit 35**): <https://dl.dropboxusercontent.com/u/30028085/Sh.Pk.W.Eq.Wildlife.Bridge.plan.pdf>

**VI. The Draft Plan’s Coastal Policy Analysis Ignores Federal, State, and Local Laws that Promote and Protect Public Recreation, Historic Resources, and Endangered Species.**

The Draft Plan does not follow its own maxim that proposed management alternatives “should be in compliance with existing statutes, administrative regulations, and common law. . .”<sup>56</sup>

On top of not complying with the lead resource agencies’ rulings in the Pump House Project administrative proceedings, the Draft Plan and its Coastal Policy Analysis<sup>57</sup> omit key provisions of: the Endangered Species Act; the California Public Resources Code: Coastal Act Sections 30116, 30210, 30213, 30221, and 30223, which protect and promote recreation and in particular low-cost public recreation, in the coastal zone; and Environmental Quality Act Sections 21001 and 21060.5, which protect historic property, and recognize historically significant property as within the definition of “environment”.

The Draft Plan and its Coastal Policy Analysis also omit key provisions of the Pacifica General Plan and Pacifica Local Coastal Land Use Plan, which recognize Sharp Park Golf Course as a Pacifica Historic Site, and which specifically call for protection and preservation of the Sharp Park Golf Course and its seawall.

**Endangered Species Act, 16 US Code Section 1531 ff**

Section 1532. Definitions. For the purposes of this chapter— . . . .

(13) The term “person” means an individual, corporation, partnership, trust, association, or any other private entity; or any officer, employee, agent, department, or instrumentality of the Federal Government, of any State, municipality, or political subdivision of a State, or of any foreign government; any State, municipality, or political subdivision of a State; or any other entity subject to the jurisdiction of the United States. . . .

(19) The term “take” means to harass, harm, pursue, hunt, shoot, wound, kill, trap capture, or collect, or to attempt to engage in any such conduct.

Section 1638 -- Prohibited Acts

(a) Generally

(1) Except as provided in sections 1535(g)(2) and 1539 of this title, with respect to any endangered species of fish or wildlife listed pursuant to section 1533 of this title it is unlawful for any person subject to the jurisdiction of the United States to –

(B) take any such species within the United states or the territorial sea of the United States

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<sup>56</sup> Draft Plan, supra, at page 51

<sup>57</sup> Draft Plan, supra, Appendix D / Coastal Policy Analysis (link at footnote 2, above)

## California Public Resources Code / Coastal Act

**Section 30116** “Sensitive coastal resource areas” means . . . land and water areas within the coastal zone of vital interest and sensitivity. “Sensitive coastal resource areas” include the following: . . .

(b) Areas possessing significant recreational value.

(c) Highly scenic areas. . . .

(f) Areas that provide . . . recreational opportunities for low- and moderate-income persons.

**Section 30210.** . . . . maximum access . . . and recreational opportunities shall be provided for all the people . . .

**Section 30213.** Lower cost visitor and recreational facilities shall be protected, encouraged, and, where feasible, provided.

**Section 30221.** Oceanfront land suitable for recreational use shall be protected for recreational use . . . .

**Section 30223.** Upland areas necessary to support coastal recreational uses shall be reserved for such uses, where feasible.

## California Public Resources Code / Environmental Quality Act

**Section 21001.** The Legislature further finds and declares that it is the policy of the state to:

(a) Develop and maintain a high-quality environment now and in the future, and take all action necessary to protect, rehabilitate, and enhance the environmental quality of the state.

(b) Take all action necessary to provide the people of this state with clean air and water, enjoyment of aesthetic, natural, scenic, and historic environmental qualities. . .

**Section 21060.5.** “Environment” means the physical conditions which exist within the area which will be affected by a proposed project, including land, air, water, minerals, flora, fauna, noise, objects of historic or aesthetic significance.

## Pacifica General Plan (1980)

The Pacifica General Plan Historic Preservation Element and Historic Sites Map designate Sharp Park Golf Course and Clubhouse (Site 19) and Laguna Salada and Marsh (Site 18) as Pacifica “Historic Sites”.<sup>58</sup>

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<sup>58</sup> Pacifica General Plan, Historic Preservation Element and Historic Sites Map, at pages 95 and 95a:

<http://www.cityofpacifica.org/civica/filebank/blobdload.asp?BlobID=3443>

(True copies of relevant pages are attached as **Exhibit 36.**)

## **Pacifica Local Coastal Land Use Plan<sup>59, 60</sup>**

Sharp Park Municipal Golf Course. . . . A 50-foot berm protects the golf Course and marsh from intrusion of salt water and humans, and ensures Perpetuation of the freshwater marsh habitat which supports one of the largest known San Francisco garter snake habitats. . . . Because of the sensitivity of the habitat, the need for dredging and berm protection, and the need to protect the snake population, the California Department of Fish and Game should undertake management of the garter snake habitat. . The criteria identified for the protection of the garter snake and its habitat and the continuation of the golf course use are consistent with the following policies of the Coastal Act. . . (At page C-41.)

### **Recreational Use of Wetlands . . .**

Salt water intrusion which would have significant adverse effects on the wetland habitat by damaging habitat vegetation and water quality shall be prevented. (At Page C-101.)

### **Plan Conclusions . . .**

Historic buildings and sites shall be protected.  
(See General Plan, Historic Element).” (At Page C-106.)

## **VII. The Draft Plan’s Economic and Cost-Benefit Analyses Fail to Account For or Value the Golf Course, Public Recreation, and the Significant At-Risk Public, Private, and Natural Resources Protected by the Seawall. Nor Does it Flag Extraordinary Highway Costs of a “Wildlife Corridor”.**

The Draft Plan’s Economics Analysis states, in its introductory paragraph: “Economics plays an important role in decision making when choosing between coastal options.”<sup>61</sup> But all of the Draft Plan’s economic analysis and cost/benefit charts and figures fail to identify or to value the golf course, public recreation, endangered species, neighborhoods, and infrastructure at risk at Sharp Park: At-Risk Infrastructure Tables 11 and 14 (at pages 48 and 56), Sharp Park Results Summary (Figure 18, at page 63), and Economics Analysis Appendices (Appendix F, at Sharp Park Economic Analysis Table F-9, at page F-16, and “Units at Risk” table, Appendix F-1) .

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<sup>59</sup> Pacifica Local Coastal Land Use Plan. <http://www.cityofpacifica.org/civica/filebank/blobdload.asp?BlobID=7043> True copies of the pages containing the cited provisions are attached hereto as **Exhibit 37.**) The Pacifica Coastal Plan is certified by the Coastal Commission. The Draft Plan Coastal Policy Agenda includes extensive citation of “City of Pacifica LCP Update: Policy Issues Identified for Consideration. But the cited provisions are to a now-outdated draft; a more updated version of the draft Pacifica LCLUP is dated 2014 and available on the City of Pacifica website. Because the pending draft has not yet been adopted by Pacifica, the ultimate Pacifica LCLUP provisions are at this time speculative.

<sup>60</sup> There is some question whether Sharp Park beach and seawall lie within the Pacifica local coastal planning jurisdiction – or instead under the retained coastal development permitting jurisdiction of the Coastal Commission (which jurisdiction was exercised by the Commission in the Pump House Permit case: California Coastal Commission, Staff Report, April 3, 2015, *supra* (footnote 42), at page 12 <http://documents.coastal.ca.gov/reports/2015/4/th8a-4-2015.pdf> (Copies of cited pages attached as **Exhibit 30.**)

<sup>61</sup> Appendix F, Economics Analysis, *supra* (footnote 2), at page F-1.

## **A. Unanalyzed At-Risk Recreation, Natural Resources, Commerce, and Public and Private Property at Sharp Park.**

The Sharp Park seawall protects everything behind it against ocean flooding: public recreation and infrastructure, endangered snakes and frogs, businesses, and Pacifica residential neighborhoods. These would all be lost or severely damaged if the seawall were allowed to erode. Private property owners and commercial lessees might well have “takings” claims against governmental entities whose policies prevented maintenance and repair of protective structures that these private citizens have grown to depend upon.

But these potential losses and their costs are nowhere noted or accounted for in the Draft Report’s asset inventories and economic analyses (the Executive Summary tables ES-1 and ES-2, at pages ix and x; the Infrastructure-at-risk tables 11 and 14, at pages 48 and 56.

**The Frogs and the Snakes.** Incredibly, the Draft Plan does not list the freshwater-dependent California red-legged frog and San Francisco garter snake, residents of the Laguna Salada wetlands, as species “currently at risk” at Sharp Park.<sup>62</sup> This omission is inconsistent with the Draft Report’s Appendix C/Biological Assessment:

“To the west of Laguna Salada, a . . . seawall and levee protect the marsh complex from tidal inundation. High storm surges such as those in 1956 and 1983 caused levee overtopping and temporarily introduced seawater into the complex; however, levee reinforcement in 1989 has prevented additional occurrences. The USFWS perceives that snake populations at Laguna Salada decreased following the two salt water inundation events in the 1980s, which reduced amphibian breeding capacity and reduced pretty availability for garter snakes. . . Minimizing saltwater intrusion is key to maintaining freshwater habitat for continued CRLF breeding at the Laguna Salada wetland complex.”<sup>63</sup>

**The Golf Course, Pump House, and Public Recreation.** Though the Draft Report states that “recreation is a major economic driver in the area,” and purports to list “how the population uses the region’s coastal zone,”<sup>64</sup> neither the golf course nor its infrastructure, public golf recreation, nor the popular Clubhouse bar/restaurant at Sharp Park are mentioned or evaluated in the Draft Report.

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<sup>62</sup> Draft Plan, supra (fn. 1), at page 48, Table 11, “Infrastructure, habitat, and species currently at risk”; Table 11 in a footnote says: “... red-legged frog and San Francisco garter snake [are present] in the vicinity of Laguna Salada in the Sharp Park Golf Course. . . Their habitats of residence, however, are not immediately at risk in the critical erosion hotspots [which include Sharp Park] although this is expected to change in the coming decades.”

<sup>63</sup> Draft Plan, Appendix C/Biological Assessment, supra (footnote 2), at the 14<sup>th</sup> unnumbered page. (True copies of relevant pages are attached hereto as **Exhibit 1**.)

<sup>64</sup> Draft Plan, supra (footnote 1), at page 32

Against the seawall at the southwestern corner of the golf course sits the Sharp Park Pump House,<sup>65</sup> whose pumps drain flood waters from the golf course. The Draft Report's Coastal Erosion Hazard Zone map for Sharp Park<sup>66</sup> projects that under the "No Action" (Option 4) and the two "managed realignment" options (options 1 and 2), the shore would move inland by 2050, and further inland still by 2100. A comparison of the Sharp Park Hazard Zone map, Figure A2.7, with the Coastal Commission's Pump House slide, shows that the Pump House would be an erosion victim by 2050 under the Draft Plan's management Options 1, 2, and 4. The Draft Report's at-risk infrastructure charts (Tables 11 and 14) fail to identify this important infrastructure.

Loss of the pumps would mean loss of most of the golf course west of the Coast Highway. Without the pumps, San Francisco informed the Coastal Commission that flood waters would destroy Holes 9 and 11 through 18 — that is, nine of the fourteen holes west of the Coast Highway.<sup>67</sup> In its April 16, 2015 Order approving the Sharp Park Pump House Project, The Coastal Commission found that inability to pump flood waters from the golf course would result in continued flooding, and ultimately would "deprive low-income users of the opportunity to play golf with coastal views."<sup>68</sup>

**The Surrounding Residential Neighborhoods, and Public Health.** If the Sharp Park seawall were allowed to fail, the West Fairway Park and Clarendon Road residential neighborhoods south and north of the golf course would be subject to flooding — "a recurrent problem since the 1940's," according to the 1992 PMW report.<sup>69</sup> But the Draft Report does not recognize this risk. Its Infrastructure-at-Risk tables (Tables 11 and 14, at Draft Report, pages 48 and 56) do not show any residences or streets at risk at Sharp Park. Also missing from the Draft Report and its Biological Assessment Appendix is any discussion of the public health implications of the Biological Assessment's proposal to greatly expand the size of the wetlands — thereby greatly increasing the mosquito population and the risk of mosquito-borne disease—in the middle of highly-populated residential neighborhoods.

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<sup>65</sup> See the Coastal Commission's aerial photo of the seawall, golf course, and wetlands; the Pump House sits below the "Horse Stable Pond" arrowhead, between circled numbers 3 and 5: <https://dl.dropboxusercontent.com/u/30028085/TSh.Pk.Pump.Hse.pdf%20%28CCC.4.16.15%29.pdf>. This slide was part of Commission Staff's power point presentation at the April 16, 2015 public hearing on the Sharp Park Pump House Project. (A true copy is attached hereto as **Exhibit 38**.)

<sup>66</sup> Coastal Erosion Hazard Zone map for Sharp Park, Figure A2.7, from Appendix B, "Detailed Coastal Hazard Maps," to Draft Plan: <https://dl.dropboxusercontent.com/u/30028085/CRSMP.Sh.Pk.Haz.Zn.Map.Fig.A-2.7.pdf> (A true copy of the Sharp Park Coastal Hazard Map is attached hereto as **Exhibit 39**.)

<sup>67</sup> California Coastal Commission Staff Report, April 3, 2015, *supra* (footnote 42), adopted by the Commission at its April 16, 2015 public hearing on the Pump House Project, at page 19. (Copies of the cited pages are attached hereto as **Exhibit 30**.) <http://documents.coastal.ca.gov/reports/2015/4/th8a-4-2015.pdf>

<sup>68</sup> California Coastal Commission, Staff Report, *supra* (footnote 42), at page 35 <http://documents.coastal.ca.gov/reports/2015/4/th8a-4-2015.pdf>

<sup>69</sup> Philip M. Williams (1992), *supra* (footnote 23), at page 3 (Copies of cited pages are attached as **Exhibit 15**.) <https://dl.dropboxusercontent.com/u/30028085/SFPGA.PWilliams.Laguna.Salada.Plan.1992f.pdf>

## B. Rough Estimates of the Costs of Seawall Erosion at Sharp Park

It is clear from the absurd \$2.8 Million “net benefit” figure, shown in the Draft Report’s charts as the economic result of “No Action” (allowing the seawall to erode) that the Draft Report fails to value the losses of the above-described at-risk assets at Sharp Park.<sup>70</sup>

The magnitude of the Draft Plan’s omissions is seen in these rough estimates:

Loss of Golf Course Property:	\$21.8 Million <sup>71</sup>
Loss of Architectural Heritage:	Not yet valued <sup>72</sup>
Loss of Public Recreation Value:	At least \$9 Million <sup>73</sup>
Loss of Pump Infrastructure:	\$2 Million (est.)
Loss to the surrounding neighborhoods:	Same as Beach Blvd. <sup>74</sup>
Loss of habitat for endangered snakes, frogs	Not yet valued
Loss of golf and Clubhouse commercial businesses	At least \$9 Million <sup>75</sup>
Waste of 78% of the Pacifica Recycled Water Project	\$7.8 Million <sup>76</sup>

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<sup>70</sup> The Draft Plan’s “Sharp Park Summary” chart, Figure 18 (at page 63), taken together with the “Summary of Net Economic Benefits” chart (Table ES-1, at page ix) and the Economics Analysis of Sharp Park chart (Table F-9, at page F-16 of Appendix F-Economics Analysis (link at footnote 2).

<sup>71</sup> The \$21.8 Million figure is conservative, representing 50 acres (one-half of the approximately 100 acres of golf course west of the Coast Highway), at \$435,600 per acre (calculated at \$10 per square foot, per the Economic Analysis Appendix, at page F-10).

<sup>72</sup> Sharp Park is an Alister MacKenzie seaside public links course. This is a priceless heritage asset, recognized as Historic Resource Property by both San Francisco and Pacifica.

<sup>73</sup> The \$9 Million is the present value of \$1 Million in annual greens fees collected at Sharp Park, over the period 2015-2050, subject to a 4% discount rate. This is a very conservative estimate, based on the low end of Sharp Park’s annual reported greens fee income, and upon Sharp Park’s moderate greens fee structure.

<sup>74</sup> The same value should be used for private property loss at Sharp Park as for the neighboring Beach Boulevard reach, because flooding at the Sharp Park seawall will move into the Clarendon Road neighborhood; additionally, flood waters would move south into the Fairway Park West neighborhood

<sup>75</sup> The \$9 Million is a rough estimate of the present value of the combined bar-restaurant business at the Clubhouse (with approximate \$1 Million annual gross receipts, 10 fulltime employees, and at least 20 part-time employees), together with the greenskeeping operation at the golf course, whose 8 fulltime City of San Francisco maintenance employees have combined annual salary and benefits of approximately \$800,000. (See the 2013-2014 Revenue and Expenditure Report, discussed at footnote 12 above, a copy of which is attached hereto as **Exhibit 4.**)

<sup>76</sup> See discussion of the Pacifica Recycled Water Project, above at page 7, at footnotes 28-30 of this letter . The golf course is the designed user of 78% of the capacity of the \$10 Million project.

A conservative estimate of the combined total “cost” of these losses would be a present value of **\$49.6 Million**, plus the unknown value of the losses to the two residential neighborhoods, plus the more-difficult-to-calculate values and costs of the architectural and historical heritage and the habitat and endangered species, and finally, the potential for a many-tens-of-millions-of-dollars price tag on a CalTrans “wildlife corridor” for the Coast Highway at Sharp Park.<sup>77</sup>

### **VIII. Drafter Bias is a Possible Explanation For the Draft Plan’s Poor Analyses at Sharp Park**

The Draft Plan’s principal drafters are ESA-PWA and Peter Baye. Bob Battalio is ESA’s “vice president, chief engineer, and leader of ESA’s Environmental Hydrology Coastal Zone Engineering & Management team.”<sup>78</sup>

Messrs. Battalio and Baye have played active roles in a campaign by environmental organizations Center for Biological Diversity and Wild Equity Institute to shut down Sharp Park Golf Course and convert the property into a nature preserve. They were the first two signatories on an August 19, 2009 letter to San Francisco Recreation and Park General Manager Phil Ginsburg, calling for golf course closure and “restoration of Sharp Park wetlands”.<sup>79</sup> The letter was used as part of Center for Biological Diversity’s anti-golf political campaign, and in the August 19, 2009 Center for Biological Diversity press release.<sup>80</sup>

As paid consultants to Wild Equity Institute and Center for Biological Diversity, ESA-PWA, with Mr. Battalio as Project Director, and Peter Baye, authored the “Conceptual Ecosystem Restoration Plan”<sup>81</sup>, submitted by Wild Equity in its unsuccessful opposition to San Francisco’s Pump House Permit applications to the US Fish and Wildlife Service, Army Corps of Engineers, and the California Coastal Commission. In February, 2011, Wild Equity also

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<sup>77</sup> See discussion, above at the end of Section V, at page 13, and footnotes 54 and 55, of ESA-PWA’s and Dr. Baye’s designs for “partnerships with CalTrans” for a “wildlife corridor” project, tunneling the Coast Highway under, or bridging it over, an approximately one-eighth mile section of highway at Sharp Park. The “Conceptual Ecosystem Restoration Plan compared the project to the Doyle Drive approach to the Golden Gate Bridge (see footnote 54 at page 13, above).

<sup>78</sup> See Mr. Battalio’s resume from the ESA-PWA website: <http://esassoc.com/bios/robert-battalio-pe>. (A true copy is attached hereto as **Exhibit 40**.)

<sup>79</sup> Letter to Phil Ginsburg from Bob Battalio, Peter Baye, et al, August 19, 2009: <https://dl.dropboxusercontent.com/u/30028085/CBD.Scientists.Ltr.Sh.Pk.8.19.20.pdf> . (A true copy is attached hereto as part of **Exhibit 17**.)

<sup>80</sup> Press Release, Center for Biological Diversity, August 19, 2009: <https://dl.dropboxusercontent.com/u/30028085/CBD.Prs.Rls.re.Scientist.Ltr.Sh.Pk.8.19.09.pdf> . (A true copy of the press release is attached hereto as part of **Exhibit 17**.)

<sup>81</sup> Conceptual Ecosystem Restoration Plan, etc., *supra* (footnote 45), at page 46. <https://dl.dropboxusercontent.com/u/30028085/ESA-PWA.2011.Laguna.Salada.Plan%2C%202.10.11.pdf> For that project, Mr. Battalio was identified as “Project Director”. (True copies of the cited pages are attached hereto as **Exhibit 33**.)

submitted a copy of that Conceptual Ecosystem Restoration Plan to San Francisco Mayor Ed Lee, as part of Wild Equity’s political campaign to close the golf course.<sup>82</sup>

The same ESA-PWA-authored “Conceptual Ecosystem Restoration Plan” is now cited in the Draft Plan’s Appendix C/Biological Assessment, as authority for the flood-the-golf-course / let-the-seawall-erode management strategies advocated in the ESA-PWA/Peter Baye-authored Draft Report for Sharp Park.

There is question whether Corps of Engineers personnel working on the CSMW project were advised in writing before January 23, 2015 by ESA-PWA of its prior consulting work for Wild Equity Institute on the “Conceptual Ecosystem Restoration Plan”.<sup>83</sup>

## IX. CONCLUSION

A principal purpose of the Draft Plan – as stated in the opening paragraph of the Executive Summary – is to “frame policy and guidance strategies. . . on coastal stretches where mitigating existing and expected future coastal erosion and other co-objectives – e.g., ecology, recreation, and protection of property and infrastructure – is or will be crucial for their survival.”

But the Draft Plan is not credible and so is not suitable as a policy-framing and guidance document, because the Draft Plan’s information is so very clearly incomplete and outdated and slanted – and so inconsistent on key points with other Sharp Park reports, including the PWA 1992 and Tetra-Tech 2009 reports and the recent administrative agency determinations and orders of the US Fish and Wildlife Service and the California Coastal Commission in the matter of the Sharp Park Pump House Project.

Since 2012, four different courts--federal and state, trial and appellate--have, rejected challenges—from ESA-PWA and Mr. Baye’s clients Wild Equity and Center for Biological Diversity--to San Francisco’s Sharp Park golf and habitat recovery plan and to its permits. By now, much work has been completed, including the Pump House Project and the \$10 Million Pacifica Recycled Water Project to irrigate the golf course.

Sharp Park Golf Course has been there since 1932--predating Pacifica’s incorporation by 25 years--and is the eponym for Pacifica’s entire Sharp Park District. It is a beautiful and important property, and an historic cultural and recreational resource. Sharp Park is an internationally-significant municipal golf course – one of the very few public courses and the only public seaside links in the world designed by Alister MacKenzie. The golf course is recognized as “Historic Resource Property,” protected under the California Environmental Quality Act. The California Coastal Commission recognizes it as “Sensitive Coastal Resource Area” for its moderately-priced public recreational and scenic qualities.

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<sup>82</sup> Cover Letter to Mayor Ed Lee, February 10, 2011. (Copy of is attached as **Exhibit 41**.)  
<https://dl.dropboxusercontent.com/u/30028085/Ltr.W.Eq.to.Mayor.Lee.re.ESA.2011%2C%202.10.11.pdf>

<sup>83</sup> September 5, 2013 letter Julie Witt, USACE to Richard Harris, enclosing copy of January 25, 2013 e-mail Bob Battalio to John Dingler, USACE: <https://dl.dropboxusercontent.com/u/30028085/USACE.FOIA.9.5.13.pdf> . (A true copy of the Witt letter, with the Battalio e-mail, is attached hereto as **Exhibit 42**.)

Since the California Coastal Conservancy-sponsored PWA report in 1992, San Francisco's laudable plan to renovate the golf course while recovering habitat for frogs and snakes has been the subject of exhaustive studies, environmental impact reports, public hearings and comment, decisions, orders, and millions of dollars of expenditures, from, among others, the San Francisco PUC and Rec and Park Departments and Board of Supervisors, Pacifica's North Coast County Water District, the US Fish and Wildlife Service, the California Coastal Commission, California Coastal Conservancy, the State Water Resources Control Board, the SF Bay Regional Water Quality Control Board, and the Corps of Engineers.

There is no mention in the Draft Plan about the golf course's well-documented recreational, historical, architectural, and community values, and no analysis in the Draft Plan's Economic Analysis sections about the losses to the golf course, its infrastructure, and public recreation—estimated at nearly \$50 Million in Section VII of this letter, above. And no mention of seawall erosion threatening Sharp Park's surrounding neighborhoods.

Where the California Coastal Commission found Sharp Park to be a "Sensitive Coastal Resource Area for its modestly-priced public recreation and views, the Draft plan has no discussion of the golf course, and places no value on its public recreation. The U.S. Fish and Wildlife Service finds that maintenance and repair of the seawall road—and hence the seawall, which is the roadbed—is a condition of the Incidental Take Statement, binding on San Francisco and the Corps of Engineers. By contrast, the Draft Plan finds that the frog and snake are "not immediately at risk" at Sharp Park, and recommends intentional strategies of non-maintenance and non-repair.

In view of all of the above, the Draft Plan's "No Action" and "Managed realignment," also known as "Managed Retreat," options—which in lay terms mean prohibiting maintenance and repair of the seawall – are wholly unacceptable at Sharp Park.

The San Francisco Public Golf Alliance, on behalf of its 6,500-plus members, respectfully requests that the Coastal Sediment Management Workgroup: remove the "No Action" and "Managed Realignment" from its Sharp Park Reach Management Alternatives; and update its report to include the administrative agency decisions, laws, and assets and values at risk behind the Sharp Park Seawall, all as discussed in detail above.

Respectfully submitted,

*Richard Harris*



San Francisco Public Golf Alliance  
Richard Harris, President  
Bo Links, Vice President  
Co-Founders

cc: See list, next page

cc: Ed Lee, Mayor, City and County of San Francisco  
Dennis Herrera, San Francisco City Attorney  
Senator Diane Feinstein  
Congresswoman Jackie Speier  
London Breed, President, San Francisco Board of Supervisors  
State Senator Rich Gordon  
State Senator Jerry Hill  
Assemblyman Kevin Mullin  
San Mateo County Board of Supervisors  
Pacifica City Council  
Pacifica City Manager Lori Tinfow  
Van O'Campo, PE, Pacifica Dept. of Public Works  
Mark Buell, President, SF Recreation and Park Commission  
Philip Ginsburg, General Manager, SF Recreation & Park Dept.  
Lisa Wayne, Natural Areas Coordinator, SF Rec & Park Dept.  
John Maltbie, County Manager, County of San Mateo  
Marlene Finley, Director, San Mateo County Parks Dept.  
Hilary Papendick, San Mateo County Office of Sustainability  
John Dingler, USACE  
Kearns & West  
Joe Huston, Ex. Dir., Northern California Golf Association  
Kevin Heaney, Ex. Dir., Southern California Golf Association  
Lyn Nelson, Chair, San Francisco Mayor's Women's Golf Council  
Jeff Volosing, President, Sharp Park Golf Club  
Lisa Villasenor, Captain, Sharp Park Business Women's Golf Club  
Mike Davis, Exec. Dir., U.S. Golf Association  
Steve Mona, Exec. Dir., World Golf Foundation  
Nick Zwick, President, Alister MacKenzie Foundation  
Gene Zanardi, Alister MacKenzie Society  
Jim Lazarus, Sr. Vice Pres., San Francisco Chamber of Commerce  
Vickie Flores, CEO, Pacifica Chamber of Commerce  
Anne LeClair, President, San Mateo County / Silicon Valley Visitors etc. Bureau  
Nathaniel Jackson, President, Bay Area Golf Club  
Lester Johe, President, Golden Hill Golf Club  
Gwendolyn Brown, President, Spear Golf Club  
Greg Roja, President, Mabuhay Golf Club  
Gabriel De La Torre, President, MAGA, San Jose Chapter  
John Major, Big SIR, Sons in Retirement  
Jim Emery, San Francisco Deputy City Attorney  
Sally Stephens, Chair, SF Dog

Kearns & West, Attn: Julia Golomb  
John Dingler, USACE

Please see the above-attached comment letter to the Cal Sediment Management Workgroup, regarding CSMP's San Francisco Littoral Cell Sediment Management Draft Plan. San Francisco Public Golf Alliance urges CSMW to remove from the SF Littoral Cell Sediment Management Plan any "management alternatives" for the Sharp Park Reach in Pacifica – including "No Action" and any "Managed Realignment" policies – that would prohibit maintenance and repair of the Sharp Park Seawall. Following is the text of the Executive Summary of our comment letter, briefly summarizing our objection to that policy. Our enclosed Comment Letter explains and supports our objections to "Managed Realignment" and "No Action" in detail, with extensive reference to a 25-year record of studies and plans and public review and decisions and Court decisions and millions of dollars of investment by public agencies, dealing with the recreational and environmental issues at Sharp Park. That record is highly relevant, but is not discussed or referenced in the Draft Plan. For that reason, we provide you with the details in our comment letter. I hope you find it helpful. Our Comment letter is detailed and well-footnoted to the record, and has electronic links to all of our citations. We are preparing hard copies, including copies of the exhibits. If this would be helpful to you or your staff, please let me know, and I will provide. Thank you and Best Regards.

***Richard Harris***  
***San Francisco Public Golf Alliance***  
***Phone: (415) 290-5718***

**SF Littoral Cell CRSMP Draft Plan, January, 2016 / San Francisco Public Golf Alliance Objects to Management Options That Would Prohibit Maintenance and Repair of the Sharp Park Seawall**

### **EXECUTIVE SUMMARY**

**Sharp Park is a beautiful and complex coastal**

**Sharp Park is a beautiful and complex coastal property, owned by San Francisco, and located in Pacifica. It is the site of an historic and popular municipal golf course, and the Laguna Salada freshwater wetlands that are habitat for endangered species. It borders two Pacifica residential neighborhoods—West Fairway Park and Clarendon Road. All of these are protected from the Pacific Ocean by the Sharp Park Seawall.**

**San Francisco is mandated by the US Army Corps of Engineers and a 2012 US Fish and Wildlife Service Biological Opinion and Incidental Take Statement, to maintain the seawall and keep it in good repair. When the California Coastal Commission in 2015 granted a Coastal Development Permit for a San Francisco project to enhance the habitat and improve the flood-prevention pumping system at Sharp Park, the Commission expressly rejected a demand from project opponents to impose a “managed retreat” condition on the seawall.**

**On January 4, 2016, the interagency California Coastal Sediment Management Workgroup—perhaps somehow unaware of these prior resource agencies’ rulings—promulgated, as a policy-framing and guidance document, the “San Francisco Littoral Cell Coastal Regional Sediment Management Plan, Draft, 2016” (the “Draft Plan”). This Draft Plan proposes four “management alternatives” for the Sharp Park Seawall--three of which, clearly preferred by the Draft Plan’s drafters--would prohibit maintenance and repair of the seawall.**

**But mandatory non-maintenance and non-repair of the Sharp Park Seawall does not belong on any list of “management options,” because it would imperil the golf course, the neighborhoods, and the species, it would violate the conditions of the Incidental Take Statement and the Corps of Engineers permit, and invoke Endangered Species Act violations.**

**Incongruously, the same “Conceptual Ecosystem Restoration Plan” on which environmental groups Wild Equity Institute and Center for Biological Diversity (CBD) relied in their unsuccessful opposition to the USFWS 2012 Biological Opinion and Incidental Take Statement and the 2015 Coastal Commission permit, is now cited by the Draft**

**Biological Opinion and Incidental Take Statement and the 2015 Coastal Commission permit, is now cited by the Draft Plan as authority for the three proposed “management alternatives” that would prohibit maintenance and repair of the seawall. ESA-PWA and Peter Baye PhD were authors of that “Conceptual Ecosystem Restoration Plan,” as consultants to Wild Equity and CBD. These same consultants, ESA-PWA and Dr. Baye, are also key drafters of the Draft Plan.**

**More than that, at Sharp Park, the Draft Plan is clearly incomplete and riddled with errors and information gaps. The Draft Plan’s cost-benefit analyses ignore the Sharp Park Golf Course and its infrastructure and commercial business and the recreational values of moderately-priced public recreation, and the security of the adjoining neighborhoods. The Draft Plan even denies that the protected species are “immediately at risk” at Sharp Park.**

**So, at least as to Sharp Park, the San Francisco Public Golf Alliance submits that the Draft Plan is unreliable and unsuitable as a policy-framing and guidance document.**



February 19, 2016

Coastal Sediment Management Workgroup  
Suzan M. Ming, Project Manager  
U.S. Army Corps of Engineers  
911 Wilshire Blvd.  
Los Angeles, CA. 90017

Clifton Davenport, Project Manager  
California Geological Survey  
135 Ridgeway  
Santa Rosa, CA. 95401

**Re: SF Littoral Cell CRSMP Draft Plan, January, 2016  
Supplement to SF Public Golf Alliance letter of February 8, 2016,  
Questioning the Draft Plan's "Shoreline Change Rate" at Sharp Park**

Dear CSMW,

This is a supplement to the February 8, 2016 comment letter submitted by San Francisco Public Golf Alliance. For the following reasons, it appears to us that (1) the Draft Plan may overstate the current rate of shore erosion at Sharp Park Beach, and (2) in fact there may have been no appreciable beach narrowing at Sharp Park since the current seawall was erected in or about 1989.

The Draft Plan<sup>1</sup> at Figure ES-3, “Shoreline Change Rates by Reach” (at page v) charts an average “Shoreline Change Rate” of approximately one and two-thirds feet per year erosion at the Sharp Park Beach.<sup>2</sup> The Draft Plan comments: “Shore erosion rates were computed for the study reaches (Figure ES-3). . . . All of the beaches South of Middle Ocean Beach [including Sharp Park]. . . . *are eroding* between one and two feet per year averaged over the longer term and across each shore reach. Additional information can be found in ESA PWA (2012).” (emphasis added)

We have now had a chance to review the cited source document, ESA PWA, 2012, “Technical Memorandum #1: Preliminary Implementation Options for CRSMP Reaches.”<sup>3</sup> In a section captioned “Shoreline Erosion Analysis,” at pages 5-6, Technical Memorandum #1 states: “Most of the reaches show a median of erosion over the past 60 years.” At its Table 3 (found at page 6), captioned “Shorelines Used in Shoreline Change Analysis,” Technical Memorandum #1 identifies USGS shoreline studies dated 2010, 1998, 1956, 1962, and 1946 as the sources for its erosion analysis for the beaches including Sharp Park.

At Sharp Park’s average annual erosion rate of one and two-thirds feet per year (according to the Draft Report’s Figure ES-3), the total shoreline erosion for the 60-year period from 1952 through 2012 (the year Technical Memorandum #1 was written) would be 100 feet.

However, this does not mean that Sharp Park Beach is *currently* eroding at the one-and-two-thirds-foot-per-year rate. Or at all. According to the 1992 California Coastal Conservancy-sponsored Philip M. Williams “Laguna Salada Resource Enhancement Plan”<sup>4</sup> the Sharp Park Reach (also known as Salada Beach) eroded 100-150 feet during the period 1978-1984.

“Considerable shoreline erosion has occurred at the Laguna Salada shoreline since completion of the Sharp Park Golf Course in 1932. Since 1931, the shoreline has retreated 200-300 feet. . . . The most severe erosion occurred in the large wave storms of 1983, when most of the embankment was eroded and wave overwash carried sand onto golf course fairways and into Laguna Salada. *Nearly half of the 200-300 feet of shoreline retreat occurring from 1931 to 1984 took place in the period 1978 to 1984.* Most of the recent retreat is probably attributable to the 1983 storms”<sup>5</sup>

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<sup>1</sup> San Francisco Littoral Cell Coastal Regional Sediment Management Plan, Draft-January 2016, at pages iv, v, and Fig. ES-3: [http://www.sfestuary.org/wp-content/uploads/2015/11/Draft\\_SFLC\\_CRSMP\\_20160104.pdf](http://www.sfestuary.org/wp-content/uploads/2015/11/Draft_SFLC_CRSMP_20160104.pdf)

<sup>2</sup> The chart itself is imprecise, and we could find no table or other explication for it

<sup>3</sup> ESA PWA, May 1, 2012, “Technical Memorandum #1: Preliminary Implementation Options for CRSMP Reaches”: <https://dl.dropboxusercontent.com/u/30028085/ESA.PWA.CRSMP.Tech.Memo%231.5.1.12.pdf>  
A true copy is attached hereto as Exhibit A. This document was not made available to us until February 11, 2016.

<sup>4</sup> Philip M. Williams Associates, 1992, “Laguna Salada Resource Enhancement Plan: <https://dl.dropboxusercontent.com/u/30028085/SFPGA.PWilliams.Laguna.Salada.Plan.1992f.pdf>  
(Copies of cited pages are attached as **Exhibit 15** to the San Francisco Public Golf Alliance’s February 8, 2016 Comment letter to the CRSMP San Francisco Littoral Cell Draft Plan.)

<sup>5</sup> Philip M. Williams Associates, 1992, *id.* at page 3, emphasis added.

If, as Williams reports, 100-150 feet of “shoreline retreat” occurred at Sharp Park between 1978-1984, this would account for virtually all of the beach narrowing at Sharp Park since 1952, and there has been no appreciable beach narrowing since the current sea wall was built in or about 1989. A possible explanation for this is Mori Point, at the south end of the Sharp Park Reach, which is positioned to capture south-moving littoral drift, and which itself appears to be eroding and potentially contributing a sand supply to the Sharp Park Reach.

The Draft Report’s Appendix A “Geomorphic Modeling,”<sup>6</sup> makes clear that shoreline erosion is a component of the Draft Report’s future shoreline movement projections, as reflected in the Appendix B “Detailed Coastal Hazard Maps”. We accordingly request that CSMW provide in its final plan an analysis of the amount of beach narrowing at Sharp Park from and after the time of the construction of the current Sharp Park sea wall in or about 1989, and that this analysis then be reflected in a revised Coastal Erosion Hazard Zone map for the Sharp Park Reach.

Respectfully submitted,

*Richard Harris*



San Francisco Public Golf Alliance  
Richard Harris, President  
Bo Links, Vice President  
Co-Founders

encl.

cc: See list, next page

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<sup>6</sup> The Draft Plan’s Appendices are found at the following link:  
[http://www.sfestuary.org/wp-content/uploads/2015/11/SFLC\\_CRSMF\\_Appendices\\_Jan2016.pdf](http://www.sfestuary.org/wp-content/uploads/2015/11/SFLC_CRSMF_Appendices_Jan2016.pdf)

cc: Ed Lee, Mayor, City and County of San Francisco  
Dennis Herrera, San Francisco City Attorney  
Senator Diane Feinstein  
Congresswoman Jackie Speier  
London Breed, President, San Francisco Board of Supervisors  
State Senator Jerry Hill  
Assemblyman Kevin Mullin  
San Mateo County Board of Supervisors  
Pacifica City Council  
Pacifica City Manager Lori Tinfow  
Van O'Campo, PE, Pacifica Dept. of Public Works  
Mark Buell, President, SF Recreation and Park Commission  
Philip Ginsburg, General Manager, SF Recreation & Park Dept.  
Lisa Wayne, Natural Areas Coordinator, SF Rec & Park Dept.  
John Maltbie, County Manager, County of San Mateo  
Marlene Finley, Director, San Mateo County Parks Dept.  
Hilary Papendick, San Mateo County Office of Sustainability  
John Dingler, USACE  
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Joe Huston, Ex. Dir., Northern California Golf Association  
Kevin Heaney, Ex. Dir., Southern California Golf Association  
Lyn Nelson, Chair, San Francisco Mayor's Women's Golf Council  
Jeff Volosing, President, Sharp Park Golf Club  
Lisa Villasenor, Captain, Sharp Park Business Women's Golf Club  
Mike Davis, Exec. Dir., U.S. Golf Association  
Steve Mona, Exec. Dir., World Golf Foundation  
Nick Zwick, President, Alister MacKenzie Foundation  
Gene Zanardi, Alister MacKenzie Society  
Jim Lazarus, Sr. Vice Pres., San Francisco Chamber of Commerce  
Vickie Flores, CEO, Pacifica Chamber of Commerce  
Anne LeClair, President, San Mateo County / Silicon Valley Visitors etc. Bureau  
Nathaniel Jackson, President, Bay Area Golf Club  
Lester Johe, President, Golden Hill Golf Club  
Gwendolyn Brown, President, Spear Golf Club  
Greg Roja, President, Mabuhay Golf Club  
Gabriel De La Torre, President, MAGA, San Jose Chapter  
John Major, Big SIR, Sons in Retirement  
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# memorandum

date 5/1/2012  
to San Francisco Littoral Cell CRSMP Project Team  
from Doug George  
cc Bob Battalio  
subject Technical Memorandum #1: Preliminary Implementation Options for CRSMP Reaches

This Technical Memorandum is the first in a series of three to describe the Plan Formulation for the San Francisco Littoral Cell Coastal Regional Sediment Management Plan (CRSMP). It is organized as follows:

1. Description of shore reaches
2. Results of shoreline erosion analysis
3. Characterization of coastal armor by reach
4. Descriptions of implementation options
5. Preliminary implementation options by reach

## ***Shore Reaches***

The study shoreline was divided into 16 sections, or reaches, based on geographic and oceanographic considerations including:

- Nearshore conditions (wave exposure, shore face geometry, bed conditions)
- Backshore conditions (land feature, such as dune, bluff,)
- Alongshore conditions (between headlands).

Judgment was used to delimit the reaches while maintaining a practical number consistent with the scope of the study and available information. The analysis yielded 16 reaches as shown in Figure 1 and described in Table 1 with preliminary characteristics. These characteristics were developed from a review of data and site observations. Future data collection is needed to confirm and refine these parameters but is outside the scope of this study.

Ex. A.1

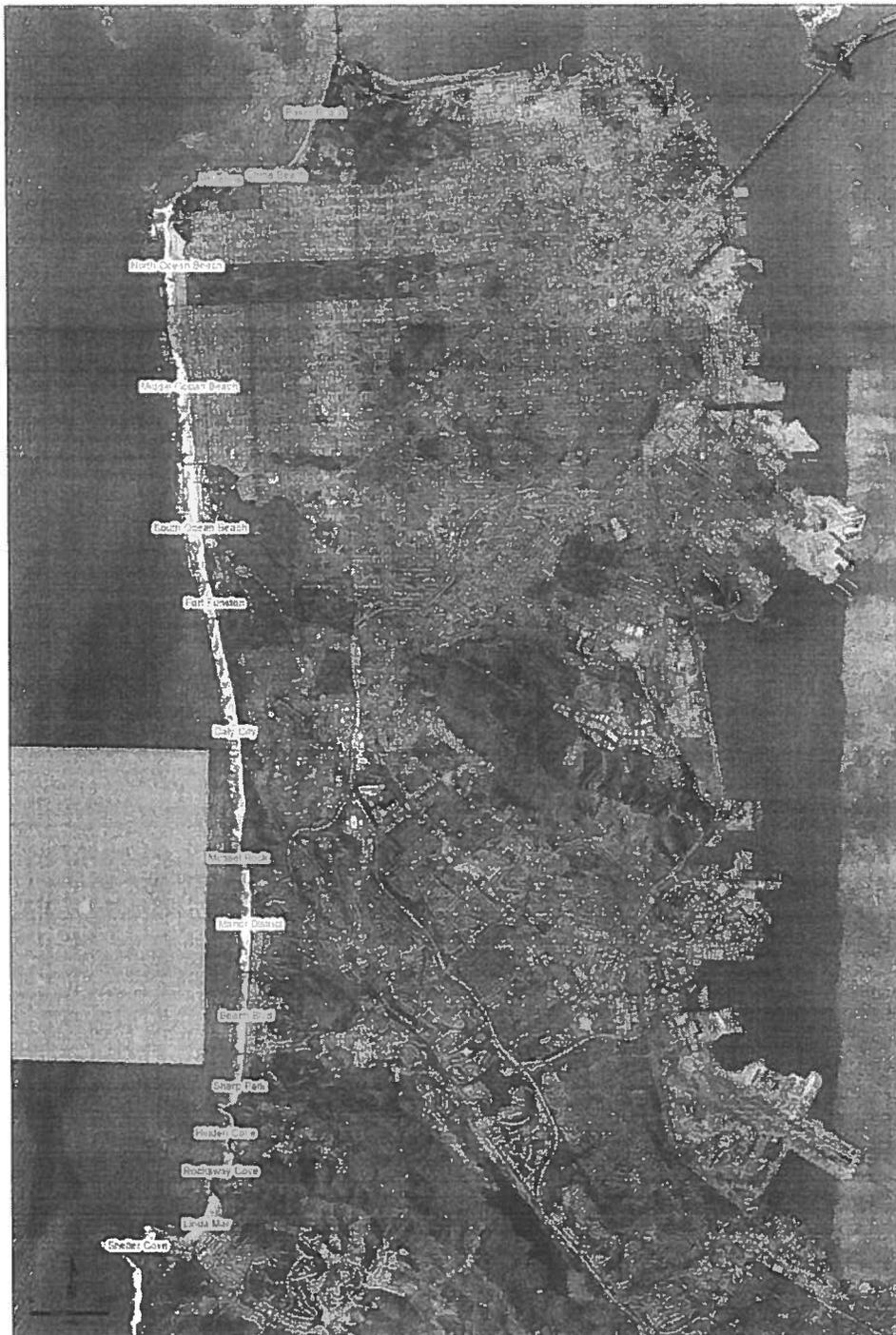


Figure 1: Shoreline Study Reaches for the San Francisco Littoral Cell CRSMP

EA2

TABLE 1 - SHORE REACHES AND PHYSICAL CHARACTERISTICS

Reach number	Reach name	Wave Exposure (qualitative intensity)	Range of Beach Width, feet	Backshore Type	Sand Content in Backshore (qualitative amount)	Offshore <sup>1</sup>	Terrestrial <sup>2</sup>	Geology
1	Baker Beach	Moderate	0 - 210	Bluff	Low	Franciscan complex. Quaternary sands	northern half: serpentinite, Franciscan chert southern half: beach and dune sand, Franciscan sedimentary, alluvium	
2	China Beach	Low	0 - 110	Bluff	Low	Quaternary sands	beach and dune sand, Franciscan sedimentary, serpentinite, hillslope deposits	
3	Pt Lobos	High	0 - 130	Bluff	Low	Franciscan complex. Quaternary sands	beach and dune sand, Franciscan sedimentary, Franciscan volcanic, Franciscan melange, serpentinite, hillslope deposits, artificial fill	
4	North Ocean Beach	Moderate	0 - 550	Armor	Low	Quaternary sands	beach and dune sand, Franciscan sedimentary	
5	Middle Ocean Beach	High	40 - 310	Armor, Dune	Low	Quaternary sands	beach and dune sand, alluvium, artificial fill	
6	South Ocean Beach	High	0 - 200	Armor, Dune	Moderate	Quaternary sands	beach and dune sand, alluvium, artificial fill, hillslope deposits, overlying Pliocene/Pleistocene sediment	
7	Fort Funston	High	0 - 140	Cliff	High	Quaternary sands	hillslope deposits, overlying Pliocene/Pleistocene sediment	

<sup>1</sup> Center for Habitat Studies/Moss Landing Marine Laboratories 2009

<sup>2</sup> USGS 2006

EX-A-3

8	Daly City	High	0 - 160	Cliff	High	Quaternary sands. gravel/sand/reworked tuff/clay of unknown age	beach and dune sand, alluvium. artificial fill, hillslope deposits, overlying Pliocene/Pleistocene sediment
9	Mussel Rock	High	0 - 100	Cliff	High	Franciscan complex. Quaternary sands	beach and dune sand, alluvium, hillslope deposits, Franciscan volcanic
10	Manor District	High	0 - 180	Armor, Bluff	Low	Franciscan complex, Quaternary sands	beach and dune sand, alluvium, hillslope deposits, Franciscan volcanic
11	Beach Blvd	High	20 - 170	Armor	Low	Franciscan complex. Quaternary sands	beach and dune sand, alluvium, hillslope deposits, Franciscan volcanic, Franciscan sedimentary
12	Sharp Park	High	0 - 260	Armor, Bluff	Low	Franciscan complex. Quaternary sands	beach and dune sand, alluvium, hillslope deposits, Franciscan volcanic, artificial fill, mud deposits
13	Hidden Cove	High	0 - 60	Bluff	Moderate	Franciscan complex. Quaternary sands	Franciscan volcanic, hillslope deposits, Franciscan sedimentary
14	Rockaway Cove	Moderate	0 - 150	Armor, Bluff	Moderate	Franciscan complex. Quaternary sands	Franciscan volcanic, Franciscan sedimentary, alluvium, artificial fill
15	Linda Mar	Moderate	0 - 280	Armor, Dune	Low	Franciscan complex. Quaternary sands	Franciscan volcanic, Franciscan sedimentary, alluvium, artificial fill, hillslope deposits, Paleocene sedimentary
16	Shelter Cove	Moderate	0 - 80	Bluff	Low	Franciscan complex. Quaternary sands, Salian plutonic (granite)	Paleocene sedimentary, hillslope deposits

*EXA-4*

Cross-shore transects were selected in all reaches, with some reaches being represented by more than one (see Appendix Figures A1-A3). These transects, once finalized, will be used in analyses of sediment transport, beach width changes, erosion rates, socio-economic concerns, and ecological assessments. A preliminary set of physical parameters for the representative transects is shown in Table 2.

**TABLE 2 – CROSS-SHORE REPRESENTATIVE TRANSECTS**

Transect ID	Reach name	Depth of Closure	Toe Elevation	Crest Elevation
		ft NAVD88	ft NAVD88	ft NAVD88
1	Baker Beach	-40	25.2	39.3
2	China Beach	-40	14.0	90.1
3	North Ocean Beach	-30	16.2	24.6
4	Middle Ocean Beach	-30	16.6	39.6
5	Middle Ocean Beach	-30	19.9	30.1
6	South Ocean Beach	-30	12.5	30.4
7	South Ocean Beach	-30	11.5	190.2
8	Fort Funston	-40	10.0	82.7
9	Daly City	-40	11.5	101.0
10	Daly City	-40	23.3	158.2
11	Daly City	-40	16.4	132.8
12	Mussel Rock	-40	18.3	201.5
13	Manor District	-40	21.9	98.2
14	Beach Blvd	-40	7.3	37.5
15	Sharp Park	-40	22.8	30.2
16	Hidden Cove	-40	16.8	114.2
17	Rockaway Cove	-40	8.7	21.4
18	Linda Mar	-40	14.1	21.5
19	Shelter Cove	-40	24.5	77.3

**Shoreline Erosion Analysis**

The shoreline erosion analysis combines a review of existing analyses and additional analysis to address gaps in existing datasets. Sandy shorelines and bluff erosions were considered separately.

**Review of Existing Data**

The USGS National Assessment of Shoreline Change for sandy shorelines (Hapke et al., 2006) and cliff edges (Hapke et al., 2007) provided the basis for most of the erosion rates in the study area. No erosion rates were reported for the Baker Beach, China Beach, or Point Lobos reaches, and the majority of the reaches backed by

*EX.A-5*

cliffs did not have erosion rates. The most recent shoreline used in this analysis was extracted from 1998 LiDAR surveys, which captured the highly eroded coast after the 1997/1998 El Niño.

Shoreline and bluff erosion rate estimates from a number of other reports and coastal development permit applications were also reviewed. Many estimates exist for the three Ocean Beach reaches (Moffatt and Nichol, 1995; Hansen and Barnard, 2010; ESA PWA, 2011) and in the Manor District, where significant development exists close to the cliff edge. The estimates for bluff retreat at the Manor District are from permit applications for construction of coastal armoring, when applicants are required to calculate the volume of sand that will be retained as a result of a new structure.

### Additional Shoreline Change Analysis

Additional shoreline change analysis was conducted to fill the data gaps at Baker Beach, China Beach, Point Lobos, Hidden Cove, and Shelter Cove as well as to include the 2010 shoreline for the entire study area to account for recent trends. Table 3 summarizes all shorelines used in this analysis.

**TABLE 3 – SHORELINES USED IN SHORELINE CHANGE ANALYSIS**

Year(s)	Source	Geographic Extent	Type
2010	USGS DEM (2011). Extracted MHW from DEM.	All study reaches except OB	MHW contour
2010	Extracted MHW line from DEM of Ocean Beach	Ocean Beach reaches	MHW contour
2006	Digitized wetted bound from USGS High Resolution Orthoimagery	China Beach and Baker Beach	Wetted bound
2002	Digitized wetted bound from USGS High Resolution Orthoimagery	China Beach and Baker Beach	Wetted bound
1998	USGS National Assessment of Shoreline Change (2010). Originally from LiDAR survey.	All reaches except China Beach, Baker Beach, and Point Lobos	MHW contour
1992	Moffatt and Nichol Report (1993). Originally from USACE photo.	Ocean Beach reaches	Wetted bound
1987	USGS Digital Ortho Quad.	China Beach, Baker Beach, Point Lobos, North Ocean Beach	Wetted bound
1959	Moffatt and Nichol Report (1993). Originally from USACE photo.	Ocean Beach reaches	Wetted bound
1946, 1952, 1956	USGS National Assessment of Shoreline Change (2010). Originally from aerial imagery.	All reaches except China Beach, Baker Beach, and Point Lobos	Wetted bound

The USGS Digital Shoreline Analysis System (DSAS) was used to calculate rate-of-change statistics for 931 transects along the entire study area. DSAS creates transects along the shore to measure change at specific locations (Theiler et al., 2009). The linear regression rate (LRR) was used for transects that crossed 3 or more shorelines and the end point rate (EPR) was used for transects that crossed only 2 shorelines. The individual transect rates and the median for each study reach are shown in Figure 2.

Most of the reaches show a median of erosion over the past 60 years, with the exception of North Ocean Beach that shows accretion at a median of 4 ft/year. The highest rates of median erosion are observed at Middle Ocean Beach, South Ocean Beach, Fort Funston, and Daly City that show rates of approximately 2 ft/year. However, large ranges of shoreline movement are seen within reaches, indicating variability on a local and temporal scale. The areas of rapid erosion will likely become targets for implementation options, where appropriate. Where the

*EX A.6*

variability is small and the reach is short (e.g., Linda Mar), a singular implementation option may address the erosion conditions.

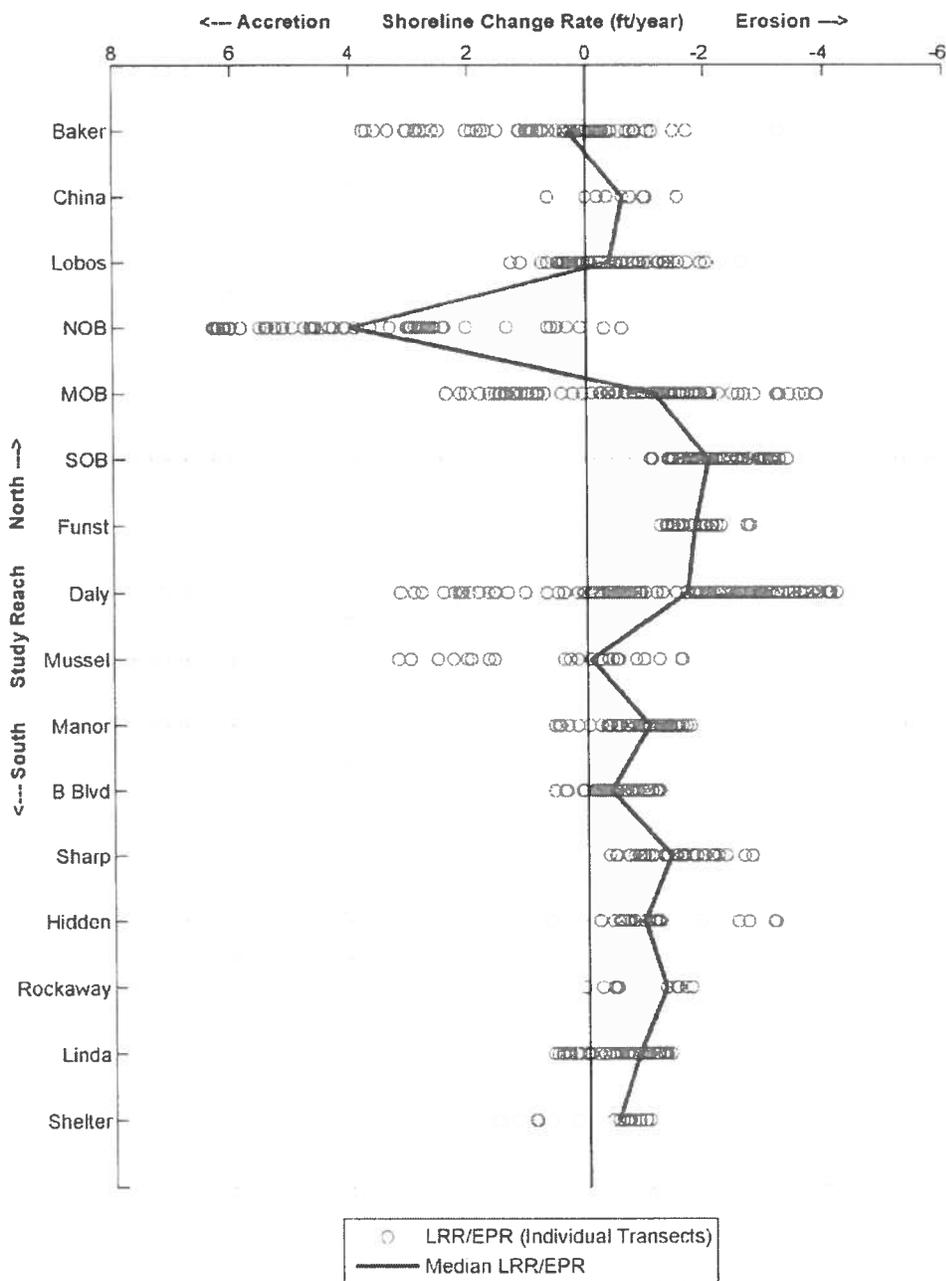


Figure 2: Shoreline Change Rates by Study Reach  
 Linear Regression Rates (LRR) and End Point Rates (EPR) for cross-shore transects constructed from the Digital Shoreline Analysis System (DSAS).

Ex.A.7

## **Coastal Armor by Reach**

In 2005, NOAA Coastal Fellow Jennifer Dare developed a statewide coastal armor GIS database for the California Coastal Commission using a combination of oblique aerial images from the California Coastal Records Photo website ([www.californiacoastline.org](http://www.californiacoastline.org)) and georeferenced orthoimages. The database contains 1807 polylines that represent coastal armor types including along-shore structures (bluff walls, infill, revetments, bulkheads, and seawalls) and other structures (breakwaters, groins, and jetties). The bluff walls were classified as either mid-bluff or upper-bluff walls. Other attributes in the database include structure material, comments, source of image, source date, and county. The accuracy of the database attributes is dependent on the originator's ability to visually identify structure types and materials from oblique photos. The linear representations of the structures are along a single California shoreline<sup>[1]</sup> and do not represent the actual alignment of structures in three-dimensional space.

For the CRMSMP, ESA PWA updated the Dare 2005 geodatabase using California Coastal Records photos taken in 2010 (ESA PWA, 2012). Additionally, the representative polylines were moved from the single shoreline (as they were in the Dare 2005 database) to their actual cross-shore locations by heads-up digitizing the alignment using 2010 National Agriculture Imagery Program (NAIP) orthoimagery. Revetments were digitized in a separate polygon shapefile to capture their two-dimensional surface extent visible at the time the photo was taken. A field visit was completed in December 2011 to groundtruth the changes recorded since 2005 and note additional changes since 2010. All discrepancies between recorded and observed attributes were corrected in the final version of the geodatabase. The field visit did not use quantitative methods (GPS points or surveying) to confirm locations or elevations of armoring. These data were included in the GIS deliverable to the CRMSMP Project Team in February 2012.

For the purposes of the CRMSMP, presence of coastal armor helps inform how active erosion may be in a location. The following types of coastal armor were defined (below) and quantified by reach to assist in identifying critical erosion areas in the study area (Table 4).

- Seawall – A wall that sits on the beach and does not extend all the way to the top of the bluff (that would be considered an upper bluff wall).
- Mid Bluff Wall – A wall that sits at an elevation above the beach but does not reach the top of the bluff.
- Upper Bluff Wall – A wall that may or may not start on the beach but extends to the top of the bluff. Includes walls sit on the top edge of the bluff.
- Revetment – A pile of rocks/boulders/hard features deliberately placed on a beach or along the base of a cliff. Revetments were classified using polygons since the size of the revetments can vary significantly from one revetment to the next and even within a single revetment. The objective was to avoid classifying piles of rocks/boulders that were not intentionally placed as armoring. However, it is not always obvious which rock piles were revetments and which were natural.

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[1] The shoreline used for this database is believed to be the NOAA medium shoreline (1:100,000).

EX-A-8

TABLE 4 – COASTAL ARMOR IN REACH

Reach	Length of Reach (feet)	Approximate Length of Shore-Parallel Armoring, by type (feet)			
		revetment	upper bluff wall	mid bluff wall	seawall
Baker Beach	8,300	0	332	571	1,737
China Beach	1,100	0	332	434	547
Pt Lobos	8,000	310	100	691	625
North Ocean Beach	5,600	0	0	886	5,055
Middle Ocean Beach	10,500	0	0	0	3,676
South Ocean Beach	7,500	1,970	236	428	103
Fort Funston	2,500	0	0	0	0
Daly City	14,700	2,220	0	2,499	0
Mussel Rock	1,800	470	0	301	0
Manor District	6,900	2,790	188	758	0
Beach Blvd	5,200	3,110	430	0	3,024
Sharp Park	4,000	1,400	0	0	0
Hidden Cove	3,200	0	0	0	0
Rockaway Cove	2,700	1,340	0	0	200
Linda Mar	7,500	0	0	0	1,142
Shelter Cove	3,000	0	0	0	117
<b>Totals</b>	<b>92,500</b>	<b>13,610</b>	<b>1,618</b>	<b>6,568</b>	<b>16,226</b>
<b>Estimated % of Shoreline Armored*</b>		<b>15%</b>	<b>2%</b>	<b>7%</b>	<b>18%</b>

\* - the values for percent of shoreline armored are slight overestimates due to the geometry of the seawalls and bluff walls (not always shore parallel)

### Descriptions of Implementation Options

The following is a preliminary list of options ESA PWA will consider to address critical erosion areas along the shoreline. Options can also be combined.

- No Action – no onshore or offshore changes are recommended to affect sediment transport or sand retention. Natural erosion or deposition processes would be allowed to occur without intervention, and/or existing armoring or retreat practices are assumed to continue.
- Beach Nourishment – sand placement on beaches to widen them or maintain current width. Sand placement can include opportunistic (i.e. SCoup) and designed projects, such as sand back-passing inside a littoral sub-cell from downdrift to updrift. Sand placement could be accomplished by pumping sand onshore using hydraulic dredging techniques, or can be placed using trucks.
- Multi-purpose Reefs – reefs placed offshore of critical erosion areas to retain sediment and reduce wave exposure in specific locations. These reefs would vary in size and number depending on the needs at the location.

EX. A.9

- Armor – construction of engineered structures (e.g., sea walls or revetments) on the coastline to protect infrastructure and/or impede erosion of the backshore. This is listed because of the extent of existing armoring and hence the likelihood that armoring will continue to be considered as an erosion mitigation measure. (See Table 4).
- Allowed Erosion – similar to No Action, this option allows natural erosive processes to occur without intervention but on a smaller, targeted scale instead of the full reach.
- Managed Retreat –landward setback of infrastructure near the shore intended to offset the effects of erosion and sea level rise. Restoration of the shoreface and back beach areas could accompany managed retreat plans. This is listed because of the extent that existing projects and plans include retreat, as follows:
  - National Park Shores (northern reaches; Baker through Ft. Funston. Hidden Cove)
  - Ocean Beach Master Plan (Ocean Beach reaches)
  - Laguna Salada Natural Area Management Plan (Sharp Park south)
  - Linda Mar – Pacifica State Beach where managed retreat has been implemented and is part of the State Park Management Plan.

***Options by Reach***

A preliminary list of options for each reach was constructed by combining the shoreline erosion rates, presence of coastal armor and existing management plans (e.g. the Ocean Beach Master Plan or plans for Sharp Park) (Table 5). In the case of the Ocean Beach reaches, information was applied directly and is more developed than the other reaches at this time. Quantification of beach nourishment volumes and frequencies is underway and will be completed for inclusion in the Administrative Draft CRSMP Report. A summary table provides an overview of the preliminary options by reach (Table 6).

*Ex. A.10*

TABLE 5 – PRELIMINARY IMPLEMENTATION OPTIONS

Reach	Options
Baker	No Action
China	No Action
Pt. Lobos	No Action
North Ocean Beach (NOB)	No Action
Middle Ocean Beach (MOB)	<ol style="list-style-type: none"> <li>1. Beach Nourishment by USACE dredging to pump 1.5 million yd<sup>3</sup> every 20-30 years onshore to widen beach and dunes by 50'. Move sand around with land-based equipment.</li> <li>2. Beach Nourishment by sand back-passing, pumped from NOB/Pt. Lobos to Sloat and moved around with land-based equipment</li> </ol>
South Ocean Beach (SOB)	<ol style="list-style-type: none"> <li>1. Managed Retreat with Beach Nourishment of 0.5 million yd<sup>3</sup> every 20-30 years with same sources as MOB (Ocean Beach Master Plan nourishment approach)</li> <li>2. Multi-purpose reefs with Beach Nourishment</li> </ol>
Ft. Funston	No Action
Daly City	No Action
Mussel Rock	Special Case: relocate or reconfigure landfill to mitigate negative effects
Manor District	<ol style="list-style-type: none"> <li>1. Beach Nourishment of unknown volume and frequency</li> <li>2. Beach Nourishment with Multi-purpose Reefs</li> <li>3. Armor in selective locations with Managed Retreat and Beach Nourishment in new pocket beaches formed from erosion between armored zones</li> </ol>
Beach Blvd	<ol style="list-style-type: none"> <li>1. Beach Nourishment of unknown volume and frequency</li> <li>2. Beach Nourishment with Multi-purpose Reefs</li> <li>3. Armor in selective locations with Managed Retreat and Beach Nourishment in new pocket beaches formed from erosion between armored zones</li> </ol>
Sharp Park	<ol style="list-style-type: none"> <li>1. Allowed Erosion: remove armor and allow levee to erode, capture sand and allow beach transgression</li> <li>2. Beach Nourishment of unknown volume and frequency</li> <li>3. Multi-purpose Reef</li> <li>4. Hybrid approach using Allowed Erosion of levee, Beach Nourishment, and Multi-purpose Reefs</li> </ol>
Hidden Cove	No Action
Rockaway Cove	<ol style="list-style-type: none"> <li>1. Beach Nourishment of unknown volume and frequency</li> <li>2. Managed Retreat</li> <li>3. No Action</li> </ol>
Linda Mar	<ol style="list-style-type: none"> <li>1. Beach Nourishment of unknown volume and frequency</li> <li>2. Managed Retreat</li> <li>3. Managed Retreat, with added cobble and sand to let the beach build higher</li> <li>4. No Action</li> </ol>
Shelter Cove	No Action

*EX. A. 11*

TABLE 6 – SUMMARY OF PRELIMINARY OPTIONS

Reach	Options					
	No Action	Beach Nourishment	Multi-purpose Reefs	Armor	Allowed Erosion	Managed Retreat
Baker	●					
China	●					
Pt. Lobos	●					
North Ocean Beach (NOB)	●					
Middle Ocean Beach (MOB)		●				
South Ocean Beach (SOB)		●	●○			●○
Ft. Funston	●					
Daly City	●					
Mussel Rock*						
Manor District		●	●○	●○	●	●
Beach Blvd		●	●○	●○	●	●
Sharp Park		●○	●○		●	
Hidden Cove	●					
Rockaway Cove	●	●				●
Linda Mar	●	●○				●
Shelter Cove	●					

● – a primary option

○ – can be combined with other options

\*- at Mussel Rock, relocation of landfill

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Ex. A.13

February 3, 2016

To Whom it may Concern:

Thank you for the opportunity to offer comments on this issue. I have been surfing at Ocean Beach since 1965 and therefore this issue is very important to me.

Given our unique geographic location a simple yet aggressive "Beach Nourishment Plan" is the most obvious solution in terms of fiscal responsibility, public access and public safety. The notion of "Managed Retreat" at this location is tragically irresponsible.

Please let us review some specific economic realities:

- The United States Army Corps of Engineers is already dredging 300-400 thousand cubic yards of sand every other July out of the SF Bay Channel. This sand should be pumped onto the beach at the Sloat Hot Spot Erosion Area. (I believe was just approved by California Coast Commission in the last 90 days.)
- SFPUC routinely moves 100 thousand cubic yards (sand back passing) from the north end of Ocean Beach to the Sloat hot spot erosion area.
- DPW routinely during the month of July removes and or moves substantial amounts of sand with their bulldozers to control accretion.
- Since the GGNR has taken over Ocean Beach it began using bulldozers to push sand from Lincoln Way north and/or west toward stairwell number One. It makes no sense whatsoever to push the sand north when the north beach of Ocean Beach is accreting when the south end is eroding.

These are the financial realities because:

A. The SF Bay Channel must be dredged to keep the Port of Oakland open.

B. To quote SF PUC Flyer August 2014, the "sand back passing project is necessary because excess sand has built up again along the O'Shaughnessy Seawall and is overflowed into the stairwells, promenade, parking lots, Great Highway, and adjacent neighborhoods. Without removal of this excess sand, National Park Service and CCSF maintenance crews will need to expend an "Extraordinary Amount of Resources to Manage the Overflow of Sand."

C. DPW Sand removal from the middle of Ocean Beach also due to sand overflow/ accretion.

D. The GGNRA I believe is trying to mitigate their graffiti removal expenses and the cost of the O'Shaughnessy Seawall repair/or cost of refurbishment expenses by burying their problems with sand.

of the O. Shaughnessy seawall repair/or cost of refurbishment expenses by burying them problems with sand.

The reality is we have currently the GGNRA, SFPUC, and DPW, US Army Corps of Engineering, Rec and Park Department, California Coastal Commission, SPUR involved yet no coherent strategy with this invaluable resource.

The solution is the US Army Corps of Engineers should start by pumping dredged material directly onto Sloat Beach. On top of that add SFPUC (back passing sand) then add on top of that DPW (middle of Ocean Beach accretion.) Now atop this newly created beach let us incorporate a plan from SFPUC from August 2014 flyer to hold the sand. "A combination of techniques will be used which may include inserting dune grass thatch from other dunes at Ocean Beach to trap sand within the berm; using coarse sediment such as pebbles and shell fragments to hold down the lighter weight sand; adding brush fencing; and /or planting native plants".

Finally, the GGNRA must stop moving sand north on Ocean Beach. Prevailing north west wind and northwest swells should help push sand south where it is needed. If sand must be moved (as in 2012 sand overflow event) it should be pushed south where it is needed. In addition no bulldozers should be allowed to operate within 100 feet of the high tide waterline as the best surf spot has already been destroyed at Ocean Beach. (VFW-Stairwell 15-28 now the worst surf spots thanks to the GGNRA.)

Long term, more beach and higher dunes with vegetation is far better for public safety and public access then to retreat from this location at a cost of 300-350 million dollars. The SPUR master Plan is extremely expensive, illogical and inherently flawed.

Thank you again.

Sincerely,

Michael Martinovich, Kelly's Cove/Ocean Beach, Local since 1958

Email: eileen.sweeters@optum.comw

1. page iii uses the word "invariably." It should be removed. It implies that whatever development is done changes and degrades. That should not be the emphasis (even if not untrue). There should be hope and recognition that there is good and bad development--not just the hopeless: it is all, invariably, bad.

2. page 14's Table 3 says South Ocean Beach is more than a mile long, 7500'. Really? Sloat to Ft. Funston is that long? It does not seem like it. The table also excludes "cliffs" from the shoreline description, which seems untrue to me, and then on page 17 I *do* see a description that includes cliffs.

3. Page "Because the actual sea level rise in the first decade of the 21st century has been minimal, to match guidance documents, existing studies, and observed sea level rise rates, 2050 and 2100 were selected as project timeframes." What does this sentence mean? Beats me. Moreover, the draft picks about 1/2" per year for SLR to 2050, and nearly one inch per year 2050-2100 (see earlier pages), yet acknowledges that for the past 35 years we've seen much less. Why, then, is so much more SLR now expected? Should that not be discussed? (Page 39-40 does have some discussion.) Given the ratio of rise to coastal migration eastward, 50-100 to one, your five feet of rise by 2100 implies that the shoreline moves east by up to 500', a significant amount. Even by 2050 the 1.5' would lead to 75'-150' of eastward movement. So, for example, you imply that absent armoring the Lake Merced Tunnel is exposed. It is 59' from exposure now, and requires a minimum of 10' of lateral support. What is the expense of moving that infrastructure? What is the risk if not moved? What does armoring cost, and what figure is in your financial analysis on page ix? Whether significant SLR is expected is really significant--meriting discussion I do not find.

On the other hand, risk of damage is increased by earthquakes, which are mentioned. Coastal rock is crumbly; shaking can make cliffs slide. Tsunamis wave is possible, too. When assessing whether to armor-protect or move the Lake Merced Tunnel, San Francisco should consider not only the risk of cliff erosion by force of the ocean, but also the risk of landslide (perhaps enhanced by the proposed pile wall), tsunamis, and earthquake. Earthquake may not directly threaten the pipe, but may indirectly affect erosion.

4. Table 13, alt. 2, SOB, refers to "minimum beach width." What is it? (Page 55 says not calculated, up to locals.) Elsewhere it is said that parts of South Ocean Beach have no beach. Is that 50" (inches) of sand; I cannot read the entry? If so, that's a lot of sand, much more than has been brought before, is it not? Unless perhaps it refers to less than all of the beach, likely only the part less than a minimum width. Is the meaning of this Table's entries fleshed out elsewhere? If not, it should be. What are the parameters? I've heard 1000' is in most serious danger; does your proposed sand quantity cover that, and how deeply? What lens of sand is proposed? 25,000 yards a year (500,000 over 20 years) does not seem sufficient.

Moreover, sand is moved by humans in summertime. Sand is moved off the beach by the ocean in winter-time, and often very rapidly. When a southwest storm combines with high tides the ocean rises and scours sand off the beach, usually running south to north. Intention to respond when the beach narrows is one thing, but the response time is likely to be far too slow to prevent damaging erosion. Serious erosion happens once a decade perhaps. When it does the impact can be great. In 2010 it was said that 40 feet of cliff eroded; another source claimed seventy feet. The ocean eats rarely, but can eat in very large chunks. A good plan recognizes and prepares. Adding small sand incrementally may not work.

Alt.2 refers to reef; is that described somewhere? At the time of creating the OBMP, artificial reef was rejected; I know, I proposed it. Surfers oppose. So far as I know there has been no study of effects on sand and beach, or on the ecosystem. Currents are very strong; anchoring would be challenging. The ocean is a marine sanctuary, and opposition from San Franciscans is certain. An EIR would take years. Is this theoretical alternative worth including?

Alt.3 says N/A to armor, yet elsewhere, and in the OBMP, there is to be low-profile armoring: a solid vertical buried wall, probably made from piles driven edge to edge, and with a cap. I find this a fantastic notion, and worry that it would create a slip plane facilitating landslide, more than defeating the purpose of protecting the LMT. But the OBMP commits to protect the LMT--through 2050 only. Replacing LMT's storage with capacity inland is one alternative, and seems nearly inevitable within the plan window. Yet no grasp on siting or cost is had, to my knowledge.

Thank you for doing a thoughtful and generally thorough job.

Steve Lawrence  
San Francisco resident

I've been around long enough to know the perils of the sea wall failing. There were kids riding boogie boards on the golf course in 1982. Homes were in jeopardy of getting flooded. All it would have taken was a little higher tide and there would have been a lot of damage. But there are other reasons:

1. Walk there on any given day of the week and you'll see dozens and dozens of people walking and riding bikes, and taking in the surrounding sea.
2. There's an affordable public golf course, designed by one of the finest golf course architects ever, that is protected by the sea wall.
3. There are two major residential neighborhoods, Sharp Park West and Fairway Park West, that could easily be damaged by high tides during large storms, ESPECIALLY if you give any credence to sea level rise.
4. There's been so much discussion about the red legged frog and San Francisco Garter Snake at the golf course. Guess what? They live at Sharp Park because the sea wall is there. They live in fresh water. If it is breached the frogs and snakes will be in salt water, so they'll either die or move.

I know it's a big deal to manage such a large structure, but to me, it's pretty straight forward. It provides a lot of people with recreation and safety. Keep it safe. Keep it in good repair.

Sincerely,

Tom Adams

Adams Video Services, LLC

[www.adams-video-photography.com](http://www.adams-video-photography.com)

[www.adams-video.com](http://www.adams-video.com)

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**Subject:** stechbart testimony Littoral cell 2/21/16 Pacifica meeting

Testimony January 21, 2016

*draft San Francisco Littoral Cell Coastal Regional  
Sediment Management Plan meeting*

Mark Stechbart

Pacifica Business and Community Political Action  
Committee

---

Pacifica needs to be protected from ocean rise.  
Pacifica needs focused leadership to avoid millions of  
dollars in property damage and being cut in several  
parts.

Hwy 1 can easily be cut, which is the only north-south  
road for half of town. It is a state highway and a  
regional arterial. Hwy 1 provides commercial,  
residential commute and emergency access for the  
entire coastside from SF to Santa Cruz.

Inaction or delay means millions of dollars worth of  
houses, businesses and infrastructure like our historic  
golf course, sewer, water and communications will be  
impacted. Permanent economic losses will be inflicted  
on Pacifica.

The current rhetoric bandied about like "managed  
retreat" or "strategic or managed realignment" are  
simply buzz words for allowing the ocean to chew  
through Pacifica.

Managed retreat, strategic or managed realignment  
and the like are unacceptable false solutions for  
Pacifica and must be rejected as policy considerations.  
As this report is being rolled out, I question why all  
potentially affected property owners were not given US  
mail notification of the policy debate, as is required

potentially affected property owners were not given US mail notification of the policy debate, as is required within 300 feet of a routine development?

The current threat to the coastside is clear, as well as some commonsense solutions.

In the past week's storms, Pacifica has suffered significant erosion in 5-6 areas. A large hole has developed on the Beach Blvd promenade seawall, which is a key part of Pacifica's future Main Street. The City has limited

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Testimony January 21, 2016

*draft San Francisco Littoral Cell Coastal Regional Sediment Management Plan meeting*

Mark Stechbart

Pacifica Business and Community Political Action Committee

funds to repair this erosion. In the 4-5 other areas affected, private homeowners and businesses are at risk.

The golf course is a key feature of Pacifica's future Main Street and is a well known historic course. It has survived the current series of storms, but a continued commitment is needed to keep erosion from destroying the course and adjacent residential and business areas.

Erosion at Surfer's Beach just south of the Princeton Harbor breakwater threatens to cut Hwy 1. Several agencies are responding.

The south side of Mirada Road in Miramar is in jeopardy and the County and HMB city are responding with protective measures.

Bay area counties have placed a parcel tax measure on the November 2016 ballot to protect infrastructure and businesses on the Bay interior shore.

[http://www.mercurynews.com/news/ci\\_29381010/san-](http://www.mercurynews.com/news/ci_29381010/san-)

and businesses on the Bay interior shore.

[http://www.mercurynews.com/news/ci\\_29381010/san-francisco-bay-restoration-and-flood-control-tax](http://www.mercurynews.com/news/ci_29381010/san-francisco-bay-restoration-and-flood-control-tax)

Bay Area-wide tax aims to protect against rising sea levels In authorizing the measure unanimously on Wednesday, members of the San Francisco Bay Restoration Authority said the tax is needed to provide \$500 million over 20 years to fortify levees and create flood relief plains to protect homes, businesses, airports, highways and parks around the bay, and restore wetlands important to fish and wildlife....

Page 3

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*draft San Francisco Littoral Cell Coastal Regional Sediment Management Plan meeting*

Mark Stechbart

Pacifica Business and Community Political Action Committee

If Google, Facebook, SFO, 101 and bay-side sewer plants warrant bay side protection, so does Pacifica and the rest of the coastside.

In closing, rigorously defend Pacifica from crippling ocean rise. Reject all variations of shoreline managed retreat.

I suggest a statewide plan rather than this balkanized littoral cell oceanside approach. If SF bay has a protection plan, what is being done for all Calif. harbors, bays and even the Sacramento Delta?

I trust we can count on Rep Speier, State Senator Hill, Assembly member Mullin, Supervisor Horsley and both US Senators to weigh in on a Pacifica protection plan and a funding schedule that solves this Pacifica issue.

US Senators to weigh in on a Pacifica protection plan  
and a funding schedule that solves this Pacifica issue.

-end-

mark stechbart [mstechbart@msn.com](mailto:mstechbart@msn.com)

## San Francisco Littoral Cell - Coastal Regional Sediment Management Plan

Comments by Sam Johnson

Main comment: The recently published USGS California Seafloor Mapping Program (CSMP) map and digital data sets should be used as primary references and cited more accurately.

Page 4. Paragraph 2 and any other additional discussion of bathymetric features (channels, bars, sand dunes, etc.) in the littoral cell should include a few maps/figures/illustrations and references. Otherwise, readers won't understand or appreciate the physical setting of the littoral cell. Obvious sources for this information are the 2013 Marine Geology Special Volume and the recent USGS map/data publications (sheets 1 and 2) for the Offshore of San Francisco (OFR 2015-1068) and Offshore of Pacifica (2014-1260) map areas.

Section 1.1.2. This section on sediment volumes and budgets should incorporate information from the recent USGS map/data publications (refs. below). Chapter 7 in the pamphlet in each publication includes a Table (7-1) that quantifies offshore sediment. It is also important to note that GIS analysts can use the digital data to determine offshore sediment volumes in smaller areas (e.g., within 500 m of the shoreline; shallower than 30 m, etc.). I think an important point to note in this section is that there is very little sediment on the inner shelf south of Ocean Beach. Regardless of recent anthropogenically influenced fluctuations in sediment supply, this is a place where sediment does not naturally accumulate.

Section 2.1. The recent USGS CSMP map/data publications (discussed above, listed below) should provide an important resource - bathymetry, offshore habitats, geology, sediment thickness and distribution, etc., in both graphic and digital (with web services) formats. To aide stakeholders, CSMW should cite and link to the USGS CSMP web site and databases.

Table 3: Check the geology columns (far right) against the recently published USGS 1:24,000 onshore-offshore geology maps. Mostly it looks good but a few updates/changes are needed. Another issue, the table needs to use the names Merced and Colma Formations, since those are the names used for the Pliocene/Pleistocene sediments in the text (in other words, the table and text are not consistent).

Section 3.2.1. The last two paragraphs on page 20 don't belong under the heading "Tectonics." Consider changing the heading to "Framework Geology and Tectonics." Even with that change, the last paragraph probably belongs in section 3.3.2.

Figure 10. This map has now been published (formal citation listed below). It would probably be more useful to instead show the more detailed Map B's on the sheet 9's for the Offshore of San Francisco and Offshore of Pacifica map/data sets (citations below). Or alternatively, show both the detailed (Map B) and regional (Map D) maps.

Section 5.3.2. This section misinterprets the USGS sediment thickness/distribution maps, suggesting offshore sediment supply is ample on the inner shelf south of Ocean Beach (its also inconsistent with Section 3.3.3, where I like the way offshore sediment deposition is described - "*a thin layer atop the wave cut platform.*") The maps show that the sediment on the shelf immediately west of Daly City and Pacifica as 0.1 to 2.5 m thick (the pink areas; accurately quoted, "up to 10 feet"). However, sediment thickness in

deposition is described - “a thin layer atop the upper cut platform.” The maps show that the sediment on the shelf immediately west of Daly City and Pacifica as 0.1 to 2.5 m thick (the pink areas; accurately quoted, “up to 10 feet.”). However, sediment thickness in much of this area is probably much closer to 0.1 m than 2.5 m. In this area, the USGS seismic-reflection data don’t have great resolution in the upper few meters because of reverberation from the strong seafloor reflection (typically this means that sediment is very thin/bedrock is very shallow). I think one would have to look farther offshore (to the 2.5 to 5 m band) to be more certain of sufficient sediment thickness/volume for beach nourishment.

Also, Figure 22 sources can be corrected to include the USGS publication (not S. Johnson, pers. comm.). And, I have mapped the San Andreas graben, but haven’t referred to it as “a large *coarse* sediment deposit.” Delete the word “coarse” and this is OK.

#### References - USGS CSMP Comprehensive map and datasets:

- Cochrane, G.R., Johnson, S.Y., Dartnell, P., Greene, H.G., Erdey, M.D., Golden, N.E., Hartwell, S.R., Endris, C.A., Manson, M.W., Sliter, R.W., Kvitek, R.G., Watt, J.T., Ross, S.L., and Bruns, T.R. (G.R. Cochrane and S.A. Cochran, eds.), 2015, California State Waters Map Series—Offshore of San Francisco, California: U.S. Geological Survey Open-File Report 2015–1068, pamphlet 39 p., 10 sheets, scale 1:24,000, <http://dx.doi.org/10.3133/ofr20151068>.
- Edwards, B.D., Phillips, E.L., Dartnell, P., Greene, H.G., Bretz, C.K., Kvitek, R.G., Hartwell, S.R., Johnson, S.Y., Cochrane, G.R., Dieter, B.E., Sliter, R.W., Ross, S.L., Golden, N.E., Watt, J.T., Chin, J.L., Erdey, M.D., Krigsman, L.M., Manson, M.W., and Endris, C.A. (S.A. Cochran and B.D. Edwards, eds.), 2014, California State Waters Map Series—Offshore of Pacifica, California: U.S. Geological Survey Open-File Report 2014–1260, pamphlet 38 p., 10 sheets, scale 1:24,000, <http://dx.doi.org/10.3133/ofr20141260>.

#### Geologic maps:

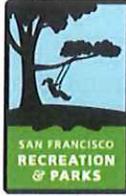
- Greene, H.G., Johnson, S.Y., Manson, M.W., Hartwell, S.R., Endris, C.A., and Bruns, T.R., 2015, Offshore and onshore geology and geomorphology, Offshore of San Francisco map area, California, sheet 10 in Cochrane, G.R., Johnson, S.Y., Dartnell, P., Greene, H.G., Erdey, M.D., Golden, N.E., Hartwell, S.R., Endris, C.A., Manson, M.W., Sliter, R.W., Kvitek, R.G., Watt, J.T., Ross, S.L., and Bruns, T.R. (G.R. Cochrane and S.A. Cochran, eds.), California State Waters Map Series—Offshore of San Francisco, California: U.S. Geological Survey Open-File Report 2015–1068, pamphlet 39 p., 10 sheets, scale 1:24,000, <http://dx.doi.org/10.3133/ofr20151068>.
- Greene, H.G., Hartwell, S.R., Manson, M.W., Johnson, S.Y., Dieter, B.E., Phillips, E.L., and Watt, J.T., 2014, Offshore and onshore geology and geomorphology, Offshore of Pacifica map area, California, sheet 10 in Edwards, B.D., Phillips, E.L., Dartnell, P., Greene, H.G., Bretz, C.K., Kvitek, R.G., Hartwell, S.R., Johnson, S.Y., Cochrane, G.R., Dieter, B.E., Sliter, R.W., Ross, S.L., Golden, N.E., Watt, J.T., Chin, J.L., Erdey, M.D., Krigsman, L.M., Manson, M.W., and Endris, C.A. (S.A. Cochran and B.D. Edwards, eds.), California State Waters Map Series—Offshore of Pacifica, California: U.S. Geological Survey Open-File Report 2014–1260, pamphlet 38 p., 10 sheets, scale 1:24,000, <http://dx.doi.org/10.3133/ofr20141260>.

#### Sediment thickness and distribution maps:

- Johnson, S.Y., Hartwell, S.R., Sliter, R.W., Watt, J.T., Phillips, E.L., Ross, S.L., and Chin, J.L., 2015, Local (Offshore of San Francisco map area) and regional (offshore from Bolinas to Pescadero) shallow-subsurface geology and structure, California, sheet 9 in Cochrane, G.R., Johnson, S.Y., Dartnell, P., Greene, H.G., Erdey, M.D., Golden, N.E., Hartwell, S.R., Endris, C.A., Manson, M.W., Sliter, R.W., Kvitek, R.G., Watt, J.T., Ross, S.L., and Bruns, T.R. (G.R. Cochrane and S.A. Cochran, eds.), California State Waters Map Series—Offshore of San Francisco, California: U.S. Geological Survey Open-File Report 2015–1068, pamphlet 39 p., 10 sheets, scale 1:24,000, <http://dx.doi.org/10.3133/ofr20151068>.

Survey Open-File Report 2015–1068, pamphlet 39 p., 10 sheets, scale 1:24,000,  
<http://dx.doi.org/10.3133/ofr20151068>.

Johnson, S.Y., Hartwell, S.R., Sliter, R.W., Watt, J.T., Phillips, E.L., Ross, S.L., and Chin, J.L., 2014, Local (Offshore of Pacifica map area) and regional (offshore from Bolinas to Pescadero) shallow-subsurface geology and structure, California, sheet 9 in Edwards, B.D., Phillips, E.L., Dartnell, P., Greene, H.G., Bretz, C.K., Kvittek, R.G., Hartwell, S.R., Johnson, S.Y., Cochran, G.R., Dieter, B.E., Sliter, R.W., Ross, S.L., Golden, N.E., Watt, J.T., Chin, J.L., Erdey, M.D., Krisgman, L.M., Manson, M.W., and Endris, C.A. (S.A. Cochran and B.D. Edwards, eds.), California State Waters Map Series—Offshore of Pacifica, California: U.S. Geological Survey Open-File Report 2014–1260, pamphlet 38 p., 10 sheets, scale 1:24,000,  
<http://dx.doi.org/10.3133/ofr20141260>.



Edwin M. Lee, Mayor  
Philip A. Ginsburg, General Manager

February 18, 2016

Coastal Sediment Management Workgroup  
C/A Kearns & West ([jgolomb@kearnswest.com](mailto:jgolomb@kearnswest.com))

Suzan M. Ming, Project Manager  
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135 Ridgeway  
Santa Rosa, CA 95401

**Re: Comments on San Francisco Littoral Cell Coastal Regional Sediment Management Plan Related to Sharp Park**

Dear Coastal Sediment Management Workgroup,

Below please find the San Francisco Recreation and Park Department's comment on the draft San Francisco Littoral Cell Coastal Regional Sediment Management Plan ("CRSMP"), as it relates to our Sharp Park property located in Pacifica, California.

Thank you,

A handwritten signature in blue ink, appearing to read "Phil Ginsburg", is written over the typed name.

Phil Ginsburg, General Manager  
San Francisco Recreation and Park Department

Cc: Ryan Olah, U.S. Department of Fish and Wildlife  
Katerina Galacatos, U.S. Army Corps of Engineers  
Suzanne Deleon, California Department of Fish and Wildlife  
Kathryn Hart, Regional Water Quality Control Board  
Stephanie Rexing, California Coastal Commission

## Executive Summary

Sharp Park (Reach 12 within the CRSMP) is a tremendous ecological and recreational resource. As discussed in detail below, the CRSMP should be revised to utilize a consistent set of mitigation alternatives across all reaches, and if it is not, at a minimum the Plan should include a justification for why the particular menu of mitigation alternatives was selected for each reach. Additionally, the Plan should acknowledge the presence of endangered species and wetland habitat protected by the Sharp Park seawall and the potential risk to species and habitat that would result from seawall erosion. Finally, the Plan should account for the value of the recreational, commercial, and infrastructure assets at Sharp Park.

## Introduction

The San Francisco Recreation and Park Department (“SFRPD”) is the owner of Sharp Park, a 417-acre public park in Pacifica. Sharp Park includes an historic 18-hole public golf course, an archery range, a remediated former rifle range, a Spanish hacienda style golf clubhouse, a parking lot, extensive natural areas, and a 27-acre wetland complex that supports the highest concentration of special-status wetland wildlife species on the San Francisco peninsula. (See CRSMP, App. C, p. 9<sup>1</sup>.) Sharp Park’s wetlands are mostly positioned along the western boundary of Sharp Park, adjacent to the Pacific Ocean but protected from saltwater inundation by a constructed coastal seawall.

### **The Plan Includes an Imbalanced and Unexplained Set of Alternatives for the Sharp Park Reach, with Three of the Four Alternatives Including Destruction of the Seawall**

For each of the CRSMP’s “erosion hazard zone” reaches, the Plan selects a set of erosion mitigation alternatives specific to that reach and analyzes the costs and benefits of these alternatives. For Sharp Park, four mitigation alternatives are discussed, three of which call for erosion of the Sharp Park seawall. (CRSMP, pp. 53, 63.)

Instead of selecting a different set of mitigation alternatives for each reach, we suggest that the Plan select a *consistent* menu of alternative mitigation strategies to analyze across all erosion hazard zones reaches based on economic, ecological, and recreational considerations. Rather than presenting a standard set of mitigation alternatives for all reaches, the Plan varies the menu of alternatives for each reach *prior* to analysis (without justifying the menu selected). This approach confounds a potentially helpful cross-comparison of how the same mitigation alternative might perform in different reaches and obscures the analysis of what the best mitigation approach for each reach might actually be.

The fact that the mitigation alternatives selected are different for each reach suggests that they are prescriptive plans. This is contrary to the statements in the Plan itself.<sup>2</sup> Because the Plan pre-

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<sup>1</sup> Please note that the pages in Appendix C do not include page numbers. We have counted the pages ourselves and refer to our own numeration in this comment letter.

<sup>2</sup> While the CRSMP alleges to be a non-prescriptive guidance document (CRSMP, p. 3), and states that the Plan “does not preclude the study and implementation of other erosion control alternatives” (CRSMP, p. xiv), the Plan

decides a custom-tailored menu of mitigation alternatives for each reach, future policy makers may confuse the mitigation alternatives selected as policy recommendations, rather than impartially analyzed mitigation options. This creates a risk that the Plan may be misinterpreted as a prescriptive document. If the Plan took the objective approach of analyzing a consistent set of alternatives for all reaches, this confusion would be eliminated.

Furthermore, a comparison of the Sharp Park mitigation alternatives with those for other reaches raises important questions left unanswered by the Plan. Whereas three of the four alternatives for Sharp Park include seawall erosion as an element of the alternative, four of the five alternatives discussed for the Beach Boulevard reach (located immediately north of Sharp Park) include a “hold the line” strategy. (CRSMP, pp. 53, 62.) The Plan does not include an explanation for the imbalance in treatment among reaches or for why particular alternatives were or were not discussed for each reach.

If the Plan does not revamp the methodology to include a consistent set of alternatives for all reaches, at a minimum the Plan should include a clear justification for why the particular menu of mitigation alternatives was selected for each reach. This justification should explain why some reaches contain an apparent presumption of a particular mitigation strategy (due to the fact that most mitigation alternatives follow a particular approach), such as the apparent presumption for seawall erosion at Sharp Park, and the apparent presumption for “hold the line” at Beach Boulevard. As the Plan currently stands, there is no explanation, and the reader is forced to draw his or her own conclusions.

### **Sharp Park’s Seawall and its Endangered Species**

Though the Laguna Salada wetland complex was historically a coastal brackish to saltwater lagoon or back barrier pond with some level of hydrologic connection to the Pacific Ocean, this hydrologic connection was severed<sup>3</sup> in the 1980s with the construction of a seawall on the western boundary of Sharp Park. This seawall eliminated the natural barrier beach processes that used to result in natural lagoon drainage and intermittent tidal inundation of Laguna Salada, and changed the Laguna Salada wetland complex into a protected, more predictably fresh to brackish wetland that currently supports a permanent population of California red-legged frog (“CRLF”) and San Francisco garter snake (“SFGS”). SFRPD conducts annual surveys of CRLF, and recent surveys reveal a healthy and potentially growing population of CRLF in the Laguna Salada

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also states that it will be used to “frame policy and guidance strategies” (CRSMP, p. i), and states that it is intended to “point policy makers in the right direction and help *narrow* policy options.” CRSMP, App. F, p. F-1, emphasis added. Moreover, one of the Plan’s averred goals “is to identify projects that could be considered further for state or federal funding.” CRSMP, p. i. Therefore, policy makers will likely use the CRSMP to narrow planning options for sediment management and to direct state and federal funding (which is frequently crucial to project implementation). For this reason, the disclaimer that the Plan is merely non-prescriptive is somewhat misleading. Nonetheless, we take the Plan at its word that it is intended to be only an informational guidance document.

<sup>3</sup> A certain volume of saltwater regularly seeps through the seawall into the wetland complex and tidal overwash intermittently occurs, so the severance is not complete. Though this seepage and overwash contribute a certain salinity to the wetland, routine water quality sampling conducted by the San Francisco Public Utilities Commission and direct evidence of prolific California red-legged frog breeding indicate that current salinity levels are tolerable to frog populations.

wetland complex.<sup>4</sup> Though surveys of SFGS are not conducted by SFRPD, CRLF are the SFGS's primary food source and a growing population of CRLF will support SFGS health.

The Laguna Salada wetland is an artificially managed system, and continues to exist as SFGS foraging habitat and CRLF breeding habitat in the areas protected by the seawall. (Pacifica Local Coastal Land Use Plan (Second Printing 1992), p C-41.) If the seawall were to be removed, the existing CRLF and SFGS freshwater wetland habitat may be put at risk. Indeed, prior to the seawall, Sharp Park's SFGS population almost entirely collapsed following saltwater inundation, and leading SFGS scientists have even speculated that Laguna Salada may not have been historically occupied by SFGS at all due to frequent saltwater inundation. (U.S. Fish and Wildlife Service, SFGS 5-Year Review (2006), p. 6.) Even the CRSMP's own Biological Assessment acknowledges that "[m]inimizing saltwater intrusion is key to maintaining freshwater habitat for continued CRLF breeding at the Laguna Salada wetland complex." (CRSMP, App. C, p. 14.) However, the CRSMP does not evaluate--or even contemplate--this risk to SFGS and CRLF, despite the fact that that the CRSMP does contemplate seawall removal.

### **The CRSMP Disregards the Importance of Sharp Park's Endangered Species Habitat**

The goal of the CRSMP process is to "identify how governance, outreach, and technical approaches can support beneficial use of sediment resources within that region *without causing environmental degradation* or public nuisance" (Coastal Sediment Management Workgroup webpage,<sup>5</sup> emphasis added). Yet the CRSMP disregards Sharp Park's significant environmental value as habitat for CRLF and SFGS from the ecological evaluation of the alternative mitigation approaches, and does not evaluate risk to these species.<sup>6</sup>

As discussed above, three of the four mitigation options considered include the erosion of the seawall, tidal inundation of the habitat, and the return of Laguna Salada to a brackish to saltwater lagoon. As described in the Plan's Biological Assessment, seawall erosion would result in "gradual landward shoreline retreat and transgression of the barrier profile, cyclic lagoon outlet breaching and closure." (CRSMP, App. C, p. 23.) What is not acknowledged in the Plan, however, is that the elimination of the seawall could result in degradation to Sharp Park's CRLF

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<sup>4</sup> Surveys conducted by SFRPD biologists identified 89 CRLF egg masses during the 2013/2014 breeding season, and then an uptick to 203 CRLF egg masses during the 2014/2015 breeding season. The 2015/2016 CRLF breeding season is currently underway, with over 120 egg masses identified after merely a few weeks of egg laying. This data indicates a healthy CRLF population, and an upward trend in breeding.

<sup>5</sup> Available at: <http://www.dbw.ca.gov/csmw/> (last accessed 2/11/16).

<sup>6</sup> It is worth mentioning that the Army Corps of Engineers, a co-chair of this effort, is bound by the 2012 Sharp Park Biological Opinion (as a result of initiating Fish and Wildlife Service consultation), which includes as perhaps its core provision that "the Corps and [SFRPD] will minimize the potential for harm, harassment, injury, and death of" CRLF and SFGS. (2012 Sharp Park Biological Opinion, p. 41.). The other co-chair, the California Natural Resources Agency, includes as one of its departments the California Department of Fish and Wildlife ("CDFW"). CDFW is charged with implementing the California Endangered Species Act, which directly protects both CRLF and SFGS.

and SFGS supporting habitat. Rather, the Plan assumes that current CRLF and SFGS populations would continue in their current healthy state without the seawall.<sup>7</sup>

The CRSMP quantifies the ecological effect of each mitigation measure only by looking at beach health (and specifically beach width<sup>8</sup>). For this reason, seawall erosion is found to result in a net *positive* ecological effect since it will result in a wider beach. (CRSMP, p. 63.) By focusing only on the benefit of unconstrained shorelines, the Plan disregards potential impacts to endangered species in managed ecosystems (CRSMP, p. 40), and always makes the managed retreat options look more ecologically appealing. We find this ecological analysis too limited, and ask that the Plan's biological analysis be broadened to include a discussion of all ecological assets at risk (including endangered species).

Additionally, whereas the Plan does look at built infrastructure at risk under each alternative (*see* CRSMP, p. 56, Table 14), the Plan *does not* contain a similar analysis of ecological assets at risk as a result of each alternative. Considering built assets, but ignoring ecological assets, presents an incomplete picture of the external consequences of each management approach. We recommend that the Plan be revised to evaluate a comprehensive picture of the natural as well as built assets that are at risk under each alternative for each reach in the Plan area.<sup>9</sup> For Reach 12, this evaluation should include an assessment of the risk of mitigation options 1, 2, and 4(i) (the seawall erosion options) on the Laguna Salada wetland habitat and CRLF and SFGS populations.

Table 11 of the CRSMP, entitled "Infrastructure, habitat, and species currently at risk"<sup>10</sup> (CRSMP, p. 48), acknowledges that a freshwater pond is present at Sharp Park, but does not state that this freshwater pond is critical breeding habitat for endangered species, and does not

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<sup>7</sup> See CRSMP, App. C, p. 9 ("The barrier beach and lagoon ecosystem that supports [CRLF and SFGS] is inherently subject to coastal geomorphic and fluvial processes (overwash, barrier narrowing and landward transgression/rollover, lagoon fluvial flooding and breaching) associated with shoreline retreat.") Buried in an appendix, the Plan correctly states that CRLF can only survive in a freshwater wetland (CRSMP, App. C, p. 14.), but the remainder of the Plan fails to acknowledge that CRLF and SFGS survival is not possible in a saltwater ecosystem. The revised Plan should clarify this throughout.

<sup>8</sup> See CRSMP, p. xi ("[c]onceptually, a wider beach that is infrequently disturbed by construction activity is considered more likely to have a vibrant ecology"); CRSMP, p. 32 ("benefits to habitats can be qualitatively described by considering that wider beaches provide additional dune, shoreface, and better-protected coastal-bluff habitats"); CRSMP, App. C, p. 23 ("Criteria for comparing benefits and risks of alternatives are related to long-term barrier beach integrity in response to rollover (profile maintenance by washover, landward transgression), barrier crest elevations, and capacity for rapid beach and closure cycles").

<sup>9</sup> It is worth noting that *both* natural and built assets are evaluated in other documents evaluating the risk of sea level rise in the region. For example, the San Mateo County Sea Level Rise Vulnerability Assessment, unlike the CRSMP, looks at built assets, natural assets, *and* human assets in order to present a complete picture of the assets at risk. See San Mateo County Vulnerability Assessment, Report on Asset Categorization and Classification, published September 22, 2015. We recommend taking a similar approach and evaluating natural assets alongside built assets in order to determine the *full* cost of implementing each mitigation alternative, not the cost to the built environment alone.

<sup>10</sup> Though this table discusses habitat and species, note that it only notes the assets at risk *generally* in the coastal erosion hazard zones, and does not explore the assets at risk by *mitigation alternative*. As discussed above, the Plan only looks at the built assets (and not ecological assets) at risk under each mitigation alternative.

mention that saltwater intrusion into this habitat is potentially detrimental to CRLF or SFGS populations. Additionally, this table does not directly list CRLF and SFGS as species at risk in Sharp Park (as it does for special status species in other reaches) and instead contains a misleading footnote which states that “additional special status species are present in many of the reaches, such as [California] red-legged frog and San Francisco garter snakes in Sharp Park[]]. Their habitats of residence, however, are not immediately at risk in the critical erosion hotspots although this is expected to change in the coming decades.” Firstly, the Plan should not relegate the existence of CRLF and SFGS in Sharp Park to an ambiguous footnote, while straightforwardly acknowledging the endangered species in other reaches.<sup>11</sup> Secondly, it is technically incorrect to state that the CRLF and SFGS habitats are not immediately at risk from saltwater exposure. This habitat is at constant risk from saltwater inundation from large storm events, which could potentially cause tidal saltwater breaching of the seawall. Moreover, seawall erosion, which is contemplated by the Plan, would increase the risk of saltwater inundation.

Finally, the economic calculations that are used to evaluate the costs and benefits of each management approach do not reflect the value of the wetland. The economic analysis does not account for potential loss of the wetlands, either as an ecological or a recreational asset, despite the wetland’s importance to SFGS and CRLF populations and its role in enhancing the recreational experience for golfers, naturalists, walkers, and bird-watchers who enjoy viewing the wetland habitat from the seawall and the adjacent GGNRA areas. (See CRSMP, App. F, p. F-16, Table F-9.) Rather, the Plan measures recreational benefit by looking at *beach use alone*, and measures lost assets by looking only at built assets and assessor data. (CRSMP, App. F, p. F-9.)

Additionally, in measuring the cost of the action, no consideration is made for permitting expenses or the mitigation that would be required to provide alternative habitat for the habitat that might be destroyed as a result of losing the seawall. (CRSMP, App. F, p. F-16, Table F-9.) However, tremendously expensive, difficult, and controversial mitigation and permit processing would almost certainly be required for seawall removal and potential habitat loss (*i.e.*, a Biological Opinion from the Fish and Wildlife Service, a Coastal Development Permit from the California Coastal Commission, a Lake and Streambed Alteration Agreement from the California Department of Fish and Wildlife, and Clean Water Act Section 401 and 404 permits from the Regional Water Quality Control Board and the U.S. Army Corps of Engineers).

### **The Plan Discounts Sharp Park’s Recreational, Commercial, and Infrastructure Assets**

Sharp Park is one of the last remaining public golf courses on the West Coast, and with its affordable rates and beautiful location it provides a valuable and unique recreational facility for Bay Area golfers. Likewise, the Sharp Park seawall is in constant use by joggers, dog-walkers, birders, naturalists, fishermen, and people who enjoy walking by the ocean without walking on

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<sup>11</sup> The importance of the Laguna Salada habitat for the survival of the SFGS as a species cannot be overstated. The U.S. Fish and Wildlife Service recovery plan for the critically endangered SFGS identifies the Laguna Salada/Mori Point property as one of *only six* “significant” populations of SFGS remaining in the world. (U.S. Fish and Wildlife Service, SFGS 5-Year Review (2006), p. 4.) The possibility of danger to this population, since it is being contemplated by the Plan as a potential consequence of considered alternatives, should be discussed front and center.

the sand, and provides an important recreational benefit free of charge while also promoting environmental engagement and physical exercise.

As discussed above, the Plan only looks at the economic benefits and economic impacts (*i.e.*, revenue) derived from *beach use*, without considering the economic impacts of other forms of recreation. (CRSMP, App. F, p. F-7.) This narrow ‘beach-only’ conception of economic benefit and impact discounts the tremendous recreational value that the non-beach resources in Reach 12’s coastal erosion hazard zone provide to the public under the seawall preservation option (Option 3), and makes some of the seawall erosion options look more economically appealing by contrast.<sup>12</sup> This approach, which values only beach resources, will always make the managed retreat option look more economically appealing. The economic analysis for Sharp Park is therefore significantly misleading. The Plan ought to look not only at recreational beach use, but at all recreational use within the coastal erosion hazard zone for each alternative within each reach.

Additionally, the Plan does not consider the infrastructure that would be lost at Sharp Park under the seawall erosion options. As shown in the Plan diagrams, Options 1, 2, and 4(i) would result in losing the seawall, the Sharp Park pump house, and also portions of four of Sharp Park’s fairways, whereas Option 3 (the hold the line option) would result in the retention of all Sharp Park infrastructure. (CRSMP, App. B, Figure A-2.7.) Perplexingly, the economic analysis values the infrastructure lost under the “hold the line” option as practically the same as what is lost under the seawall erosion options.<sup>13</sup> Though it is not entirely clear from the Plan, this apparently results because the CRSMP classes the seawall and Sharp Park land as government land<sup>14</sup> with practically no commercial or infrastructure value, and therefore its loss is practically *de minimus* when it is balanced out with increased beach width to be gained by an eroded seawall.<sup>15</sup> This analysis disregards the commercial value of an 18-hole golf course (which would not be commercially-viable as a golf course, and would not be playable for tournament purposes, if it lost four of its fairways), as well as the recreational value of the seawall. Tidal inundation of

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<sup>12</sup> The Plan values the recreational benefit of option 3 (“hold the line”) at \$5.5 million dollars, and options 1 and 2 (seawall erosion) at over \$11 million dollars. CRSMP, App. F, p. F-16.

<sup>13</sup> The public infrastructure lost under the “hold the line” option (option 3) is valued at \$525,338, and the public infrastructure lost under the seawall erosion options (options 1, 2, and 4(i)) is valued at \$552,574, \$531,882, and \$487,882, respectively. CRSMP, App. F, p. F-16.

<sup>14</sup> See CRSMP, p. 48, Table 11. Sharp Park is classified as government (and not commercial) land, despite the fact that Sharp Park is a commercially profitable enterprise, employs approximately 50 people, and has a restaurant concession.

<sup>15</sup> Additionally, several pieces of valuable Sharp Park infrastructure are also not accounted for as assets in the Plan. The area at risk in Sharp Park includes a pump station which serves a large part of the Pacifica watershed (including a recently-constructed walkway around the pump house), an access road along the seawall, several outfalls, miles of golf cart paths, irrigation infrastructure, several culverts, memorial benches commemorating deceased individuals, and four golf fairways and greens. None of this infrastructure is accounted for in the Plan’s economic analysis (or in Table 11: Infrastructure, habitat, and species currently at risk), which results in an additional devaluing of the property. See CRSMP, p. 48, Table 11. We request that the Plan incorporate each of these assets into the economic analysis for Reach 12.

these resources would be a tremendous loss of valuable commercially-used parkland and infrastructure that should be accounted for in the CRSMP.

### **Conclusion**

Sharp Park is a tremendous ecological and recreational resource. The draft CRSMP contains problematic alternative selection methodology, and does not acknowledge the presence of endangered species in the Laguna Salada wetland complex and the value of the recreational assets that Sharp Park provides to the public. We respectfully request that the above comments and corrections be incorporated into the final version of the Plan.

From: [dlynch2121@aol.com](mailto:dlynch2121@aol.com)  
Subject: Sharp Park Golf course

We support maintaining the sea wall, and also support preserving the golf course. Sharps is a huge part of our community & needs to be maintained.

Thank you!  
Debbie Young Lynch

From: [mayan\\_chang@sbcglobal.net](mailto:mayan_chang@sbcglobal.net)  
Subject: Pacifica Seawall /golf course  
Please repair the Seawall in Pacifica. It is a favorite walking path for our group of senior ladies who walk it daily. As avid golfers we would like to see the golf course protected as well.

Mayan Chang

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From: [csigigie@aol.com](mailto:csigigie@aol.com)  
Subject: Sea Wall Sharp Park Golf Course

Please use all necessary funds needed to maintain the sea wall at sharp Park golf course. It would be a real blow to the course as well as the homeowners in the area if you did not take the necessary steps to maintain the sea wall. Thank you.

Chris Sigigie

From: John Young  
Subject: sharp park golf course

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Please maintain the levee. It protects out golf course!! Jy

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From: [rstotts@gmail.com](mailto:rstotts@gmail.com)

Subject: Maintaining the Pacifica Sea Wall

We want to express our support for maintaining the sea wall in Pacifica that currently protects the Sharp Park Golf Course as well as numerous private homes in the area. Given the recent storms and cliff erosion that has affected Pacifica over the years, it highlights just how necessary it is to provide proper long-term maintenance for the existing sea wall.

Thank you,  
Roy and Nancy Stotts  
1233 Glacier Ave.  
Pacifica, CA

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From: Stephanie Singer  
[wine4steph@yahoo.com](mailto:wine4steph@yahoo.com)  
Received 2/16/16

Subject: Save Sharp Park

Sharp Park golf course and restaurant is a piece of Pacifica California if anybody thinks this golf course shouldn't be there they're the ones that really need to look at the whole scope Sharp park golf course and it's beautiful restaurant have been there over 100 years. The SP area is a monument not just for golfers the people that dine in Pacifica people come from all over the bay area and further to enjoy the scenery and having such a beautiful piece of land for us to all enjoyed by playing golf or dining or just hanging out

If this seawall is not maintained and fixed it could flood 80% of Pacifica up to the through the freeway which would cause great problems for everybody who has a business in Pacifica because people couldn't get there. Oh yes and now about the frogs and the snakes who we take care at this great habitat.

We are ready to go to fight to save this this piece of land for all the people that come to Sharp Park.

We have gone through this before and we won and we will win again and I'm not just talking for myself I'm talking for everybody in Pacifica

Thank you stephanie singer

From: Alston Laughlin  
[alston6647@icloud.com](mailto:alston6647@icloud.com)  
Received 2/16/16

Subject: Sharp Park sea wall

Dear sir/ madam,

You cannot be serious!! Why does it make sense to leave the sea wall alone?  
let it erode so it eventually floods everything in front of it??

Please tell me your strategy and why time is being wasted on a ridiculous idea.

Thank you.

Alston Laughlin. SF RESIDENT

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From: Mark Smoliarz  
[gpaandgma@att.net](mailto:gpaandgma@att.net)

Subject: San Francisco Littoral Cell CRSM Plan Draft - Jan 2016 COMMENT

Dear Sir or Madam:

As a long time homeowner in West Fairway Park, located adjacent to Sharp Park Golf course, I fully oppose the Draft's management options that would exclude or prohibit the maintenance and repair of the Sharp Park Seawall.

The seawall is crucial to the historic golf course and its club house and restaurant, along with the endangered habitat it supports and the long established adjacent residential communities.

The golf course, along with the seawall berm, offer recreational activities to thousands

communities.

The golf course, along with the seawall berm, offer recreational activities to thousands of golfers, joggers, hikers, dog walkers, cyclists, nature lovers, beach goers, surfers and fishermen, each year. This area is one of the most popular destinations, not only for locals and nearby communities, but for tourists and out of town visitors.

Having played and acted as marshal at this historic course, I noticed the substantial numbers of seniors and students using this reasonably priced and easily walkable course. The historical landmark designated restaurant and clubhouse is a popular destination for community meetings, gatherings and private functions such as weddings and large banquets. It is one of the most vital economic and social destinations in all of Pacifica.

As I understand it, San Francisco is mandated by the US Army Corps of Engineers and a 2012 US Fish and Wildlife Service Biological Opinion and Incidental Take Statement, to maintain the seawall and keep it in good repair. When the California Coastal Commission in 2015 granted a Coastal Development Permit for a San Francisco project to enhance the habitat and improve the flood-prevention pumping system at Sharp Park, the Commission expressly rejected a demand from project opponents to impose a "managed retreat" condition on the seawall.

I therefore fail to understand how the draft can make non maintenance seawall recommendations and be in compliance with mandated seawall maintenance requirements.

I am a retired senior and as such, my home represents a very crucial source of income for my retirement years. Any plan which calls for disregarding maintenance of the seawall, is simply not acceptable and I am committed to doing everything, within all available legal options, to keep up the maintenance of the seawall. I'm quite baffled of any plans that may have adverse affects to the endangered habitat and adjoining residential neighborhoods.

Thank you for your consideration in this matter.

Mark Smoliarz  
770 Bradford Way  
Pacifica, CA 94044

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From: Nathan.Gustavson@marcusmillichap.com

Subject: Sea Wall Maintenance!

Dear CSMW,

Please keep and maintain the wall. I am only 33 years old and have been playing that course for 25 years. I have many great memories there and would like to see it there for my kids to play. Please help maintain the sea wall.

Thanks in advance,  
Nate

**Nate Gustavson**

*Associate Vice President Investments  
Director | National Multihousing Group*

From: [barbarapetersen201@gmail.com](mailto:barbarapetersen201@gmail.com)

From: [barbarapetersen201@gmail.com](mailto:barbarapetersen201@gmail.com)

Subject: Sharp Park/CSMP

This note is in regards to the SF Littoral Cell CRSMP, specifically the Sharp Park area in Pacifica. The management plan proposals for maintenance of the Sharp Park Seawall include alternatives which would prohibit maintenance and repair of the seawall. The cost benefit portion of the plan does not include the commercial businesses, residential homes affected, nor the recreational benefit and value of the Sharp Park Golf Course which would all be put in jeopardy if the seawall is not maintained. The Sharp Park/Fairway Park homeowners and businesses depend on the protection of the seawall. The golf course provides moderately priced recreational activities for San Francisco and San Mateo county populations as well as providing habitat for endangered species.

I have lived in the Sharp Park area for the last 40 years and can attest first hand the hundreds of citizens and visitors to this area because the seawall is here! I also enjoy the beauty and recreational value of the golf course on a regular basis. I urge you to consider that the draft plan is unsuitable and incomplete regarding the Sharp Park area of Pacifica.

Sincerely, Barbara Petersen

Barbara Petersen  
201 Lunetta Ave.  
Pacifica, CA

**From:** "Fiala, Shannon@Coastal" <[Shannon.Fiala@coastal.ca.gov](mailto:Shannon.Fiala@coastal.ca.gov)>

Hi Ben,

On behalf of the California Coastal Commission's North Central Coast District office, here are a few comments.

The report could include:

- 1) a discussion or acknowledgement of grain size compatibility issues with sources of sand for beach nourishment
- 2) a discussion or acknowledgement of national marine sanctuary regulations prohibiting beach nourishment activities (would only apply to the northernmost portion of the SF littoral cell)
- 3) a discussion of whether GHADs have ever been formed among public entities, rather than private landowners
- 4) more background on the process of forming a JPA or GHAD
- 5) a discussion of the role of non-profits in governance, such as the Coastal Conservancy or the formation of new conservancy focused on coastal regional sediment management issues

Thanks,

Shannon

# WORLD GOLF

— F O U N D A T I O N —

February 22, 2016

Coastal Sediment Management Workgroup  
Suzan Ming, Project Manager  
United States Army Corps of Engineers  
911 Wilshire Blvd.  
Los Angeles CA 90017

Clifton Davenport, Project Manager  
California Geological Survey  
135 Ridgeway  
Santa Rosa CA 95401

**Subject: SF Littoral Cell CRSMP Draft Plan – January 2016**

Dear Coastal Sediment Management Workgroup:

**Identity of Commenter:**

The World Golf Foundation is a charitable nonprofit corporation incorporated under the laws of Florida to unite the golf industry in support of initiatives that enhance the growth of and provide access to the game of golf worldwide, while preserving golf's traditional values and passing them on to others.

**Requested Action:**

Rejection of those "management options" in the Draft Plan that would prohibit the maintenance and repair of the Sharp Park Seawall that protects the Laguna Salada freshwater wetlands that provide habitat for certain endangered and/or protected species, accommodates moderately-priced public recreation for the users of the Sharp Park Municipal Golf Course, and provides security for the West Fairway Park and Clarendon Road neighborhoods of Pacifica.

**Comments:**

Introduction

The City and County of San Francisco has been mandated by the Army Corps of Engineers and a 2012 United States Fish & Wildlife Service Biological Opinion and Incidental Take Statement to maintain the subject seawall and keep it operational. When the Coastal Commission granted a Coastal Development Permit in 2015 to enhance the habitat and improve the pumping system at Sharp Park, the Commission expressly rejected a demand from the opponents of the project to impose the kind of "managed retreat" that three of the four suggested management options



would necessarily impose upon the seawall, a “managed retreat” that would destroy habitat preserving certain protected species and the 84-year old publicly owned Sharp Park golf course that has provided recreation for generations of San Francisco Bay Area residents. Sharp Park has unique interest and importance to the golf community throughout California and beyond: it is a rare public seaside links, built in the early 1930’s by Alister MacKenzie, acclaimed as one of history’s greatest golf architects.

### Background

These were the latest in a long line of decisions, findings and actions by lead resource agencies to balance recreational and environmental goals at Sharp Park – all of which have been repeatedly upheld by the Courts.

In 1992 San Francisco and the California Coastal Conservancy commissioned Philip Williams & Associates (PWA) to prepare the “Laguna Salada Enhancement Plan.” PWA recommended managing the land in a manner that would allow for public access, maintain natural habitat, and preserve the golf course that had inhabited the site since the early 1930’s. The Plan included very specific habitat enhancement prescriptions for frogs and snakes, pumping to maintain water levels and quality, dredging to control tules in the ponds and wetlands, preservation of the Sharp Park seawall to protect salt water intrusion upon the freshwater necessary to prevent various plant and animal species dependent thereon, and a recycled water irrigation system.

PWA concluded that erosion of the seawall in the 1980’s had caused high salinity in the lagoon and nearly destroyed the endangered frog and snake species dependent upon the freshwater habitat created and maintained thereby, leading PWA to make preservation and enhancement of the seawall a central organizing principle of the final “Plan” it produced for the Coastal Conservancy.

In 2009 San Francisco’s Recreation and Parks Department released a “Sharp Park Conceptual Alternatives Report” updating the 1992 PWA report. The Department recommended additional habitat recovery measures in conjunction with preservation of the historic 18-hole golf courses. Despite pressure from some quarters to close the golf course, the Recreation and Park Commission voted unanimously on December 17, 2009 to recover habitat while preserving -the 18-hole golf course.

PWA’s recommended recycled water irrigation system was completed in October 2014 as a \$10 million joint venture of the San Francisco Public Utilities Commission and Pacifica’s North Coast County Water District. The project was funded in part by a planning grant from the State Water Resources Control Board and construction funds from the American Recovery and Reinvestment Act of 2009. The recycled water system was designed to deliver seventy-eight percent (78%) of its water to the golf course.

In 2011 the City and County of San Francisco applied to the Army Corps of Engineers for a permit to improve safety, infrastructure, and habitat enhancement, a project that came to be known as the “Pump House Project.” The project envisaged partial dredging of the ponds as well as improvements to the golf course’s flood control pumping system. As required by the Endangered Species Act, the Corps engaged the United States Fish & Wildlife Service (USFWS) for the purpose of deciphering the project’s potential to affect the protected California red-

legged frog and the endangered San Francisco garter snake. USFWS issued a formal Biological Opinion on October 2, 2012 that identified salinity as a significant threat to both species and determined to apply 32 specific conservation measures to issuance of the requested permit. Among the “measures” was the following, which pertained to the seawall roadbed, which is the actual seawall itself:

*[Conservation Measure] 31. During and following completion of the Project, the SFRPD shall maintain and keep in good repair the sea wall road, which provides the only vehicle access for maintenance activities as described above. Maintenance of the roadway on the sea wall is expected to include filling ruts in the surface with aggregate or comparable materials and repairing drainage issues by out sloping the roadbed.*

As part of the same document as the Biological Opinion USFWS issued an “Incidental Take Statement” under Sections 7(b)(4) and 7(o)(2) of the Endangered Species Act that adopted all of the Conservation Measures and mandated both the City/County and the Corps to implement and ensure compliance with all of them.

Following issuance of the USFWS Biological Opinion, US District Court Judge Susan Illston dismissed a lawsuit by the Center for Biological Diversity (CBD) and Wild Equity Institute (December 6, 2012) that sought to enjoin golf at Sharp Park under the Endangered Species Act. Judge Illston ruled that the lawsuit was mooted by the USFWS Biological Opinion and Incidental Take Statement, a ruling that was upheld in 2015 upon dismissal of the appeal by the US Court of Appeals for the Ninth Circuit.

After unanimous approvals in January 2014 by the San Francisco Planning and Recreation and Park Commissions, the San Francisco Board of Supervisors approved the Pump House Project. Wild Equity and CBD brought a Writ of Mandamus in San Francisco Superior Court alleging that the approval violated the California Environmental Quality Act. This lawsuit was dismissed following trial on May 28, 2015.

Wild Equity next sued the Coastal Commission to block the 2015 Coastal Development Permit for the Project but dropped the suit after its motion for preliminary injunction was denied by San Mateo County Superior Court Judge Miram on August 20, 2015. San Francisco completed work on the Pump House Project in October 2015.

Since the California Coastal Conservancy-sponsored PWA report in 1992, San Francisco’s plan to renovate the Sharp Park Golf Course while recovering habitat for frogs and snakes has been the subject of exhaustive studies, environmental impact reports, public hearings, decisions, orders, and enormous expenditures of dollars by the San Francisco PUC, San Francisco Recreation and Park Department, San Francisco Planning Commission, San Francisco Board of Supervisors, Pacifica’s North Coast County Water District, United States Congress (via the American Recovery and Reinvestment Act, the United States Fish & Wildlife Service, California Coastal Commission, California Coastal Conservancy, State Water Resources Control Board, San Francisco Bay Regional Water Quality Control Board, and the United States Army Corps of Engineers.

## The Draft Plan

The Draft Plan suggests four “management options” for the Sharp Park seawall. Descriptions of these options make clear that one and only one of them would allow for the maintenance and repair of the seawall. The other three would purposefully encourage erosion of the seawall by prohibiting maintenance and repair. Were any of these three to be adopted, the Incidental Take Statement for the Pump House Project, which is incorporated into the Corp of Engineers’ Section 404 Clean Water Permit, would be contradicted, and the City and County of San Francisco and the Corps of Engineers would be in violation of the Endangered Species Act as well as in violation of the various Resource Agencies that have considered and roundly rejected the rationale of three of the Draft Plan’s seawall erosion strategies for Sharp Park. An 84-year old publicly owned seaside links golf course, designed by master architect Alister MacKenzie --the preservation of which was also a central tenet of various Resource Agency decisions-- would be destroyed in the process, and the West Fairway Park and Clarendon Road residential neighborhoods south and north of the Sharp Park Golf Course would be subject to flooding, a recurrent problem since the 1940’s, according to the PMW 1992 Report.

### **Conclusion:**

Prudence dictates that the Coastal Sediment Management Workgroup incorporate all relevant administrative and legal decisions into any final “Plan” and in the process eliminate contradictions that would produce a nullity. Management options that would prohibit the maintenance and repair of the seawall in favor of destroying habitat that supports endangered and/or protected species, eliminating an 84-year old public architectural landmark golf course that provides recreational and economic benefit, and subjecting two neighborhoods to periodic flooding, are unacceptable at Sharp Park.

On behalf of the WGF, I wish to thank the Coastal Sediment Management Workgroup for considering the Foundation’s comments and opinions.

Respectfully Submitted,



Stephen F. Mona  
President and CEO  
World Golf Foundation  
One World Golf Place  
St. Augustine, FL 32092  
smona@worldgolffoundation.org  
904.940-4205

Cc: San Francisco Mayor Ed Lee  
San Francisco City Attorney Dennis Herrera  
Senator Diane Feinstein  
Congresswoman Jackie Speier  
London Breed, President, San Francisco Board of Supervisors  
State Senator Jerry Hill  
Assemblyman Kevin Mullin

San Mateo County Board of Supervisors  
Pacifica City Council  
Pacifica City Manager Lori Tinfow  
San Mateo County Manager John Maltbie  
San Mateo County Parks Director Marlene Finley  
Philip Ginsburg, General Manager, San Francisco Recreation & Park Department  
Julia Golomb, Kearns & West  
Joe Huston, Executive Director, Northern California Golf Association  
Nick Zwick, President, Alister MacKenzie Foundation  
San Francisco Public Golf Alliance

## California Coastal Commission – Lesley Ewing

I have a few small comments on the RSM for San Francisco.

First, I would use mobile home park or RV park rather than trailer park – unless that is specifically referring to the area where the truck trailer are parked.

Second, I cannot understand how to establish a hazard zone working with the explanation on page 44. I do not understand erosion at time  $t$  (since the equation needs this to be a distance, not a rate) and rather than try to micro-edit this to make it sensible, it might be more useful for the reader if the text is replaced with a diagram or some type of visual image.

Finally, I do not understand, in Table 13, why some nourishment options will maintain the back shore and some will allow the back shore to erode. These might be better as separate options, or subsets of one option, rather than something that is buried in the table.

*Lesley Ewing Ph.D., PE*  
*Sr. Coastal Engineer*  
*California Coastal Commission*  
*45 Fremont Street, Suite 2000*  
*SF, CA 94105*  
*(415) 904-5291*  
[lewing@coastal.ca.gov](mailto:lewing@coastal.ca.gov)  
<http://www.coastal.ca.gov/>



February 17, 2016

Coastal Sediment Management Workgroup  
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*Controller*

LENNY FUDENNA  
*IT*

RYAN FARB  
*Rules and Competitions*

ADAM HEIECK  
*Foundation*

**Re: SF Littoral Cell CRSMP Draft Plan, January, 2016  
Comments of Northern California Golf Association**

Dear Coastal Sediment Management Workgroup,

Northern California Golf Association is a nonprofit association of approximately 150,000 members and 400 public and private golf clubs, from San Luis Obispo and Fresno in the South to the Oregon border. We are one of the largest regional golf organizations in the United States.

On behalf of our members, we write in support of the Sharp Park Golf Course. Specifically, this is to voice our opposition to any plan or “management alternative” to halt or prohibit maintenance and repair of the Sharp Park Seawall, which protects the golf course and its freshwater wetlands and its residential neighbors from the Pacific Ocean.

Sharp Park Golf Course has provided moderately-priced golf in a beautiful, seaside setting, to public golfers since the course opened in 1932. It was built by Alister MacKenzie, one of history’s acclaimed greatest golf architects. It has long been known as the “Poor Man’s Pebble Beach,” and has historically been non-discriminating and welcoming to all. In 1955, Sharp Park hosted the founding tournament of the Western States Golf Association, one of America’s oldest and largest African-American golfing societies.

The seaside links of Sharp Park is the oldest and most traditional style of golf architecture. Golf originated by the sea in the sand, at such Scottish sites as St. Andrews. At Sharp Park, Dr. MacKenzie and his associate Chandler Egan – who was also an expert in the seaside links – created for American and specifically Californian public course golfers, a seaside links in a stunningly beautiful location, in the tradition of St. Andrews.



February 17, 2016

**Re: SF Littoral Cell CRSMP Draft Plan, January, 2016 Comments of Northern California Golf Association**

We recited this in greater detail in our March 26 2015 letter to the California Coastal Commission, which we enclose, and incorporate by this reference.

We have reviewed your Sediment Management Draft Plan for the San Francisco Littoral Cell. That Draft Plan barely mentions the Sharp Park Golf Course, and makes no mention of its history and architecture and importance to the game of golf and to the public golfers who depend upon it.

Finally, we note that since the early 1990's, beginning with a California Coastal Conservancy-sponsored study, San Francisco has been working on a long-term, complex project, to balance recreational, historic, and environmental imperatives at the property by renovating the 18-hole Sharp Park Golf Course, while enhancing habitat for protected frog and snake species at Sharp Park's wetlands. This work has involved numerous local, state, and federal governmental agencies, and environmental studies and public hearings and a significant investment of public expenditures for construction of a recycled water delivery system, and improvements to Sharp Park's flood-protection pumping system. Permits for all of this have come from, among others, the Army Corps of Engineers and the California Coastal Commission. And the permits have been upheld by the Courts.

We submit that the Coastal Sediment Management Workgroup should not prohibit maintenance and repair of the Sharp Park Seawall, which protects the golf course and its freshwater wetlands and its residential neighbors from the Pacific Ocean.

Respectfully submitted,

  
Joe Huston  
Executive Director

encl.

cc: Ed Lee, Mayor, City and County of San Francisco  
Dennis Herrera, San Francisco City Attorney  
Senator Diane Feinstein  
Congresswoman Jackie Speier  
State Senator Jerry Hill  
Assemblyman Kevin Mullin  
San Mateo County Board of Supervisors  
Pacifica City Council  
Pacifica City Manager Lori Tinfow  
Van O'Campo, PE, Pacifica Dept. of Public Works  
Mark Buell, President, SF Recreation and Park Commission  
Philip Ginsburg, General Manager, SF Recreation & Park Dept.  
Lisa Wayne, Natural Areas Coordinator, SF Rec & Park Dept.  
John Maltbie, County Manager, County of San Mateo  
Marlene Finley, Director, San Mateo County Parks Dept.  
Hilary Papendick, San Mateo County Office of Sustainability  
Jeff Volosing, President, Sharp Park Golf Club  
Lisa Villasenor, Captain, Sharp Park Business Women's Golf Club  
Nick Zwick, President, Alister MacKenzie Foundation  
Gene Zanardi, Alister MacKenzie Society



March 26, 2015

California Coastal Commission  
Headquarters Office  
45 Fremont St., #2000  
San Francisco, CA. 941-5-2219

**Re: CDP No. 2-12-104/Sharp Park Pump House Project  
Commission Hearing, San Rafael, April 15-17, 2015**

**Northern California Golf Association Supports  
San Francisco's Coastal Development Permit Application  
For Sharp Park Pump House Project**

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Dear Coastal Commission,

The Northern California Golf Association ("NCGA") respectfully asks the Coastal Commission to grant San Francisco's permit application for the Sharp Park Pump House Project, to provide much-needed infrastructure improvement to the 83-year-old Sharp Park Golf Course, while at the same time upgrading the habitat for the California red-legged frog and San Francisco garter snake.

San Francisco's project meets the Coastal Act's goal of striking a reasonable balance between the needs for protection of significant coastal resources – in this case, low and moderate-cost public recreation, and both historic and natural resources.

Sharp Park is a unique, highly significant golf course and historic resource, whose preservation is of highest priority for the NCGA, and for the world of golf. It is the work of Dr. Alister MacKenzie, one of history's very best-known and best-loved golf architects, who was inducted into the World Golf Hall of Fame. Sharp Park is also a "seaside links," a specific and extremely rare type of course, built in the sand by the sea -- the original type of golf course, on which the game originated in Scotland in the 15th Century, at places such as St. Andrews, which is today regarded as the "home of golf."

Dr. MacKenzie was an expert on seaside links courses. He was the consulting architect at the Old Course at St. Andrews in the early 1920s, and the first to map that course's holes, bunkers, and rumpled coastal terrain.

Dr. MacKenzie and his assistant Chandler Egan – himself a prominent golf architect – declared their intention to model Sharp Park after the Scottish seaside links courses, and specifically St. Andrews. As reported in the *San Francisco Call-Bulletin*, January 8, 1930, MacKenzie announced his design for Sharp Park to a gathering of golf enthusiasts by proclaiming that the new course would be "as sporty as the old course at St. Andrews and as picturesque a golf course as any in the world." (<https://dl.dropboxusercontent.com/u/30028085/SFPGA.SFCall-B.1.8.30.MacKenz%2C%40SFMuni.Glf.pdf>) For his part, Egan was reported in

the February 26, 1930 *San Francisco Chronicle* as saying: "I have played at St. Andrews and I frankly believe Sharp Park will be a worthy imitation of the classic course."  
(<https://dl.dropboxusercontent.com/u/30028085/SFPGASFCron22630%2CEgan%20Praises.pdf>)

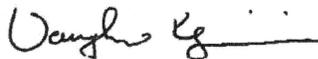
Although common in Scotland, the seaside links is a rare type of golf course in California. Dr. MacKenzie's Cypress Point Club on the Monterey Peninsula is perhaps the most famous California specimen. But that is a private golf club. Public seaside links are extremely rare. Sharp Park, plus Spanish Bay and Pacific Grove, both located on the Monterey Peninsula, are the only open-to-the-public seaside links of its kind Northern California. Spanish Bay is a resort course; only Sharp Park and Pacific Grove are low or moderately-priced.

The NCGA represents golfers and golf clubs, public and private, from San Luis Obispo and Fresno in the South to the Oregon border. Our members include 150,000 men and women golfers of all ages, and nearly 400 golf courses, both public and private. We are the largest regional golf organization in the United States.

Affordable public recreation is a critical value that the NCGA shares with the California Coastal Act and the Coastal Commission, whose mandate is to preserve low- and moderate-cost public recreational resources such as Sharp Park.

For these reasons, we urge the Commission to approve San Francisco's Sharp Park Pump House permit application.

Very truly yours,



Vaughn Kezirian  
Executive Director  
Northern California Golf Association

encls.

cc (w/encs.):

San Francisco Mayor Ed Lee  
San Francisco City Attorney Dennis Herrera  
San Mateo County Board of Supervisors  
Pacifica Mayor Karen Ervin  
Congresswoman Jackie Speier  
Phil Ginsburg, General Manager, S.F. Recreation and Park Dept.  
Kevin Heaney, Executive Director, Southern California Golf Assn.  
Mike Davis, Executive Director, U.S. Golf Association  
San Francisco Public Golf Alliance

To whom it may concern, I firmly believe that not maintaining the sea wall at sharp park is an irresponsible act, as we all know erosion is a big problem on the coast. Doing nothing puts all native plants and animals that are thriving because of the protection the sea wall provides in serious danger, please take a moment to think of all the years that have passed where these plants and animals have now found a safe haven that will most certainly parish as a result of this action. Concerned, I remain Roger Barreneche

Please protect golf course by maintaining sea wall. We enjoy the course and play regularly

The importance of maintaining the seawall at and surrounding Sharp Park not only protects the Sharp Park Golf Course, but also the many homes South of the course. Doing nothing will eventually erode this protecting wall resulting in untold damage to both these vital factors.

the retaining wall is a vital element for continuing the survival of the golf course and surrounding community it needs to remain

As a user of the coast walkways and resident of pacifica and also long time member of sharp park business women's golf club, I respectfully request that the sea wall be maintained. We reside in a small town where our public golf course is an important and historical component to our cultural, recreational life, hometown and family life. please consider the residents of the town and a those who come to visit the beautiful little town of pacifica - we need and want the sea wall maintained not only to protect a historical Alastair McKenzie designed golf course, but protect and continue the traditions of this town and all its residents of many ages and ethnicities . We also want to be able to safely enjoy the beauty of our coastal walks . There is no reason to not maintain the sea wall and protect the course and walkway, so we trust the right decision will be made.thank you.

protect sharp golf course by maintaining the sea wall.

To whom it may concern,  
Please do everything in your power to come up with a viable plan to save the seawall bordering the Sharp Park golf course and surrounding community. This coastal recreation area is a such a popular place for hikers, joggers, dog walkers and golfers alike, it would be a shame to lose it to the sea.  
Thank you for your attention to this matter.

Regarding the South Ocean Beach area, I strongly support placement of sand directly on the beach as soon as possible. Sand deposited on the beach in this area will enhance

recreation uses for the increasing number of beach visitors. When this sand is eroded from the beach by wave action it will end up either enhancing the outside sandbars or being deposited on the beaches to the north and south. I would like to voice my opposition to the implementation of the Ocean Beach Master Plan. This plan was conceived and authored by a small but vocal group of managed retreat advocates. Very few people that live on the west side of the City have ever heard of this plan to close the roads they use. It makes no sense to remove an existing artificial cobblestone berm and replace it with another cobblestone berm further inland before depositing sand on the beach. Not only is the plan very costly, it would mean the loss of a heavily travelled road in an area with a growing number of residents and visitors. It would also increase the threat of erosion to the Oceanside Wastewater Treatment Plant, and ultimately the Outer Sunset district, without any discernible benefit that could not be achieved through beach nourishment alone.

Regarding funding for the sand nourishment plan, there is a proposal for a ballot initiative for a parcel tax on Bay Area residents to pay for wetlands restoration on the shores of the Bay. Beach restoration should be included in that measure, especially considering that erosion at the beach is a more urgent problem than future sea level rise in the Bay.

I have reviewed the draft. It lacks a discussion of the best mechanism to move sand, which is an integral element of the plan. I believe the draft needs to address this issue. I strongly encourage this process to be performed as expeditiously as possible through the conveyance of sand by creating a slurry and pumping it through a pipe. This process is the most cost, space, energy, and time efficient, and the least disruptive. It is used on dozens of beaches all over the world.

We completely support maintaining the seawall & preserving the Sharp Park Golf Course. Thank you.

Please maintain the current seawall as it provides protection not only to the Sharp Park Golf Course but to the surrounding community as well.

The Sharp Park Sea wall/berm, that protects both the local community and golf course should be actively maintained by the agencies tasked with said responsibility.

I am a Pacifica resident that would like the to see the seawall protecting Sharp Park golf course and adjoining residents maintained. Several of your plans state that no maintenance will be done. That is a ticking time bomb for the ocean to tear down the wall and ruin Alistair McKenzie's national treasure, not to mention it will wipe out the local population of endangered red-tailed frogs that we have worked so hard to protect

while maintaining a popular recreation spot for so many. Dog walkers, sight seers, joggers, artists, fisherman all use this wall. Please maintain the sea wall.

I support the maintenance of the Pacifica seawall. It is critical to the existing golf course environment at Sharp Park (which is home to various wildlife).

I am commenting on the above mentioned plan related to the maintenance of the sea wall in Pacifica. I care about the recreational and community of Sharp Park, it's importance as a social center and place for golfers of all ages to grow - at a reasonable price - and all the while preserving a historical McKenzie golf course. It's a gem in our midst and we all bear the responsibility to preserve it for generations to come. I use and love Sharp Park Golf course and it is a local much loved, well-used institution. It is an activity for all ages of people especially affordable for the Senior citizens and young teenagers to high school students. Thank you for your time and consideration.

I think the most sensible plan is the one that strikes a balance amongst all parties concerned. Homeowners, the environment including all flora and fauna, and recreation including hikers, walkers, and golfers, all serve to benefit through the maintenance of the seawall. Save the seawall and all the life it enhances and protects.

The Sharp Park Golf Course and the Sharp Park Sea Wall are very important assets to the city of Pacifica. These community assets should not continue to be attacked by special interests groups. Special interest groups usually don't have the interest of the entire community in mind, only their single minded approach to what is good for them. Let's invest in our community, not tear it down with obstructionism.

Let's be clear! It is well beyond the point that the seawall needs to be maintained as well as the golf course preserved. Outside of civil litigation, you people individually are looking at criminal negligence on a number of causes of action.

Please repair and maintain the sea wall so the course and neighbors who have been here paying taxes for generations can maintain their existence without fear of environment nazis sticking their out of area noses in our livelihood and using loopholes to amend existing working conditions on the citizens of Sharp park and Pacifica

I am in support of maintaining the Sea Wall at Sharp Park Golf Course. Also it is imperative to preserve this golf course as it is a beautiful location and provides a

wonderful social outlet for our club and for the community. Thank you, Karen Skinner

I hope that you can figure out a way to ensure that the sea wall by Sharp Park Golf course and surrounding areas can be strengthened and preserved. The area is used by many different people of ages, demographics, races, etc. The golf course is one of the cheapest around and is not just for the rich. Also many, many people walk along the sea wall and nearby areas. Thank you for your consideration in these matters.

I enthusiastically and heartily support maintenance of the seawall at Sharp Park Beach, and in so doing, also protect the Sharp Park Golf Course from irreparable damage in the event of a seawall breach.

Please continue to maintain the seawall along the Pacifica coast. I live in Pacifica and use the sea wall for walking along the beach as do thousands of other people. I also play golf at Sharp Park Golf Course because it is beautiful and the only affordable golf course in the area. Please preserve our homes, coast line, beaches and golf course by maintaining the sea wall. Thank you very much. Jeff Volosing

To whom it may concern, I am writing to express support for the continued maintenance of the sea well and preservation of the golf course and surrounding areas. Sharp Park is a beloved asset of the Pacifica community and it's history and the sea wall is an integral part to keeping the course open as well as protecting the surrounding communities. Please consider what will be lost if the sea wall is not maintained and the park is unable to remain open. Thank You, Dale White

I support the maintenance of the sea wall along the golf course. Sharp Park Golf Course is the only affordable course in the area. It is enjoyed by many people and habitat to many small animals. Allowing the wall to deteriorate would be more expensive than maintaining it or making it better. Not being proactive enough has already cost many Pacifica residents to loose there dwellings. Please rebuild or repair the sea wall before it is too late. Sincerely Dave Wisnia

I support maintaining the sea wall, and also support preserving the golf course. I hate to see what the lack of attention to this area will do in the future, I am a homeowner and business on Palmetto and I can't believe why the city, or whomever is in charge keeps "band aiding" this problem. I urge you to confirming a solution to fixing this sea wall and also keep sharp park preserved.

San Francisco Baykeeper  
ian@baykeeper.org

1) Baykeeper would like to repeat a general comment regarding the geographic scope, originally made in response to the 2012 request for comments, regarding concerns that Coastal Regional Sediment Management Plans (CRSMPs) for the San Francisco Littoral Cell and San Francisco Central Bay are being developed independently, despite that peer-reviewed research strongly suggests sand resources from Central San Francisco Bay play a key factor in the maintenance of coastal beaches along the San Francisco Littoral Cell. We encourage the California Coastal Sediment Management Workgroup to combine these planning areas, for the purposes of developing sustainable and cost-effective erosion mitigation and beach management strategies. Failure to do so poses the risk of conducting redundant planning efforts and encourages public perception that resource agencies are willfully ignoring science that indicates regulated activities within the Golden Gate are contributing to erosion of nearby coastal beaches.

2) Section 3.4 (Coastal Processes), with particular respect to sand (3.4.3), deals primarily with issues of prior assumptions and data gaps. It generally does not summarize the wealth of information published in recent years regarding sediment transport and associated physical processes. Several papers in the 2013 Special Issue of Marine Geology (345), for instance, are of direct consequence to sediment management throughout the San Francisco Bay Coastal System, including the SFLC. Failure to adequately characterize readily available information limits the ability of decision makers to assess options. Baykeeper recommends that the CSRMP more fully characterizes recent research by USGS and others, particularly with respect to sediment source and transport pathways of consequence to sediment management throughout the SF Bay Coastal System.

3) Chapter 5 identifies several alternative measures for each erosional reach, yet recommended or preferred alternatives do not appear to be identified. An absence or an identified recommendation reduces the utility of the document to decision makers. Baykeeper recommends the establishment of recommended alternatives for each area of interest, along with some economic evaluation of those alternatives.

4) Section 8.1 identifies a number of data gaps and analyses necessary for implementation of the plan. Some of this information appears to be available and other information should likely be contained in the CSRMP. Baykeeper recommends either evaluation of whether these data gaps can be closed prior to completion of the document and/or identifying processes for their completion. Otherwise, it is unlikely this CSRMP will be considered complete or achieve the stated goals.

5) Chapter 9 (Conclusions) does not provide a concise summary of the recommendations for sediment management within the area of interest. This brief conclusion provides bullets of findings but does not seem to provide concrete

recommendations or pathways for achieving sustainable sediment and erosion management. If that is not the intent of this section then addition of a recommendations summary would be beneficial.