

April 3, 2004

**Planning & Zoning
Committee of the
Midcoast
Community Council**
PO Box 64, Moss Beach
CA 94038
Serving 12,000 residents

To: **China Osborn**
San Mateo County Planning and Building Division
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Redwood City, CA 94063
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re: **PLN2002-00455:** Coastal Development Permit to
install storm drain system & repair swale erosion and
Coastside Design Review for a new 5,926 s/f single-
family residence on a ~25,051 s/f lot at 888 Ocean
Blvd (northwest side of street between Madrone and
San Lucas) in Moss Beach.
APN(s) 037-271-010,020, & 030.

China:

The Planning & Zoning Committee of the MidCoast Community Council reviewed the above referenced project at our regular meetings of December 17, 2003, and February 4, 2004. The applicant was in attendance at both meetings, as were numerous concerned neighbors, nearby property owners, and other MidCoast residents. After the meetings, we maintained contact with the applicant to see if any further information or reports would be forthcoming – having received none at this time, we are sending these comments now. Should further reports, geotechnical information, or re-designs be submitted on this project, we would like to review them as they are made available.

1) Our most immediate concern is that this project is located in the most unstable and at-risk section of Zone 1, as defined in the County-commissioned reports “Geologic Report of the Seal Cove – Moss Beach Area” (1971) and the 1980 “Geologic Analysis of the Seal Cove Area.” In both these reports, it was concluded that:

*“Risk to development in this zone is considered to be extremely high. It is reasonable to conclude that slow progressive landsliding and seacliff retreat will continue, resulting in structural and property damage. This is especially true for structures or utilities located astride active surface breaks. **Rapid catastrophic slope failure of the high, steep portion of the seacliff located west of Ocean Boulevard is a clear possibility.** Such an event could involve the loss of life as well as significant property damage.”*

- Geologic Analysis of the Seal Cove Area – William Cotton and Associates, August 1980

As noted in the reports, seacliff retreat is minimally 1 foot per year in this area, and has been noted to accelerate to 4 feet per year at times. The reports further recommend that any geotechnical report address soil stability, surface and sub-surface rupture and faulting, landslide activity, and surface erosion in addition to recorded levels of seacliff retreat, and that these conditions and any attempts to mitigate these be considered in setting setbacks and placement of structures. These recommendations are reflected in LCP policy 9.8 (Regulation of Development on Coastal Bluff Tops), which is included at the end of this letter. Given these requirements, we do not see how any new structure could be placed on this property and be expected to not fall

into the Marine Reserve in less than the required 50 years. We agree with the report that, and for the sake of public safety, no further development should be allowed on properties such as this.

2) The Geotechnical and engineering information supplied with this application do not adequately address the above issues, and we feel the proposed buttressing and support along the seacliff will do little to mitigate any threat to the structure and only result in irreparable damage to the seacliff, beach, reef and marine environments below it. The report needs to address clearly the 50-year stability of the site.

The approach to stabilize and hold the cliff in place should be discouraged if not rejected by the County – it presents a false sense of security to a geological hazard that will eventually fail, and can only lead to further need to reinforce and armor the seacliff. Any situation that will inevitably result in more despoiling rip-rap being placed in the Marine Reserve should not be permitted as stated in LCP Policy 9.8(d).

3) The proposed drainage repair does not address the potential damage to the marine environment at the base of the seacliff should the retention system, which would be installed in an extremely unstable area (see Comment #1 above), fail. Even in the present design, we feel the accelerated & focused flow of storm-water off the cliff would damage the beach below.

We believe the drainage could be better addressed by a reworking of the drainage system along Ocean Boulevard, to minimize focused swale drains such as the one that crosses this property and others.

4) Regarding the design of the proposed house, we found it to be, although innovative and imaginative, vastly out of scale and character with the surrounding neighbor, as well as to be the only structure west of Ocean Boulevard, and thus having amplified impact on the views and character of the Seal Cove area.

The use of the walkway along the west edge of the property to “stabilize” the bluff edge is not only dangerous but would lead very shortly to the need to further buttress and reinforce the cliff, as discussed in Comment #2 above.

5) Although not visible from the beach immediately below, the structure would be visible from other parts of the Fitzgerald Marine Reserve, and possibly be in conflict with policies from the Visual Resources component of the Local Coastal Plan.


6) The minimal required setback from the bluff and the actual site of the rear of the building, as noted in the site plans and from on-site inspection, does not seem near the minimally required 50 feet, and that’s without taking into account the seacliff retreat rate and other geologic considerations over the next 50 years.

7) Numerous other parcels in the Zone 1 area of Seal Cove have been deemed “unbuildable” by the County, with the result that the owners have sold the land off cheaply for yard space or even donated it to Land Trusts. Few of these lots are in a location as precarious and unsafe as the

subject parcel, and we do not understand why the County is even allowing this application to continue any further.

We feel the project needs a significant amount of work to even begin explain how it could be feasible to construct within the framework of existing regulations, and, if that were possible, to be compatible and complementary with the neighborhood. As it is presented now, it is an inappropriate proposal and not at all in compliance with the policies and regulations of the LCP, Zoning Regulations, and General Plan. With the above comments, the Committee does not support the proposed project, and recommends that it be withdrawn. We would be happy to reschedule this project for further review to examine any new reports or data and to work with the applicant. Please keep us informed of any future changes, re-designs, hearings, approvals or appeals of this project.

Sincerely,



Karen Wilson
ViceChair, MCC Planning and Zoning Committee
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attached: LCP Policy 9.8

LCP Policy 9.8 Regulation of Development on Coastal Bluff Tops

- a. Permit bluff and cliff top development only if design and setback provisions are adequate to assure stability and structural integrity for the expected economic life span of the development (at least 50 years) and if the development (including storm runoff, foot traffic, grading, irrigation, and septic tanks) will neither create nor contribute significantly to erosion problems or geologic instability of the site or surrounding area.
- b. Require the submittal of a site stability evaluation report for an area of stability demonstration prepared by a soils engineer or a certified engineering geologist, as appropriate, acting within their areas of expertise, based on an on-site evaluation. The report shall consider:
 - (1) Historic, current and foreseeable cliff erosion, including investigation of recorded land surveys and tax assessment records in addition to the use of historic maps and photographs where available, and possible changes in shore configuration and transport.
 - (2) Cliff geometry and site topography, extending the surveying work beyond the site as needed to depict unusual geomorphic conditions that might affect the site and the proposed development.
 - (3) Geologic conditions, including soil, sediment and rock types and characteristics in addition to structural features such as bedding, joints, and faults.
 - (4) Evidence of past or potential landslide conditions, the implications of such conditions for the proposed development, and the potential effects of the development on landslide activity.
 - (5) Wave and tidal action, including effects of marine erosion on seacliffs.
 - (6) Ground and surface water conditions and variations, including hydrologic changes caused by the development (e.g., introduction of sewage effluent and irrigation water to the groundwater system; alterations in surface drainage).
 - (7) Potential effects of seismic forces resulting from a maximum credible earthquake.
 - (8) Effects of the proposed development including siting and design of structures, septic system, landscaping, drainage, and grading, and impacts of construction activity on the stability of the site and adjacent area.
 - (9) Any other factors that may affect slope stability.
 - (10) Potential erodibility of site and mitigating measures to be used to ensure minimized erosion problems during and after construction (i.e., landscaping and drainage design).
- c. The area of demonstration of stability includes the base, face, and top of all bluffs and cliffs. The extent of the bluff top considered should include the area between the face of the bluff and a line described on the bluff top by the intersection of a plane inclined a 20° angle from the horizontal passing through the toe of the bluff or cliff, or 50 feet inland from the edge of the cliff or bluff, whichever is greater.
- d. Prohibit land divisions or new structures that would require the need for bluff protection work.