

June 15, 2000

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cc: Richard Charnock - FAX: 650.726.7338

re: **PLN2000-00268** - Up to 3 test well on each of 6 legal parcels in the RM/CZ district in the urban area, Juliana Avenue at Vallemar (Vallemar Bluffs) in Moss Beach. APN 037-086-230 through 290

Dave:

On 6/7/00, the Planning and Zoning committee of the MidCoast Community Council reviewed the above referenced permit application. We had the following comments:

1) The proposed well drilling will be in close proximity to the only known colony of *Linanthus croceus*, a plant that was thought to be extinct for over 70 years and is currently under review for state and federal endangered status. The plants live on the "Strand" parcel on the west edge of the subject property. The Strand is owned by the County of San Mateo and designated as part of the Fitzgerald Marine Reserve. The area where the plants are established is at the edge of the bluff, and partly down an eroding slope. There is concern that the activities of the drilling could adversely affect these plants, either by direct physical damage or increased erosion on the bluff top. Also see comment 3 below concerning visible underground water at this site.

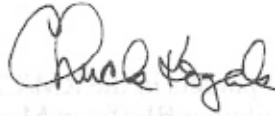
2) The committee expressed concern about saltwater intrusion into any wells drilled at this site, considering the proximity of the ocean and the drilling depth that may be necessary as evidenced from the wells currently being drilled.

3) A site visit to the property revealed that there appears to be a layer of igneous-like rock about 6 feet below the surface, which is manifested as a shelf above the beach that sits below the property. A steady flow of fresh water emanates along the top of this shelf the length of the property, and conceivably flows under the subject property. Considering the time of year and similar situations in the area, it would be a safe guess to be fed by inland springs. This flow of water, which sits well above the high tide splash zone where it exits the bluff, supports an interesting and somewhat unique habitat of marsh grasses and associated plants on the bluff. There is concern that the level of disruption by the proposed drilling could affect or contaminate this water source, and have a detrimental effect on the bluff habitat.

4) The submitted proposal did not show any plans for access roads to the drilling, a significant issue considering the size of the area, the number of wells to be drilled, and the sensitivity of coastal resources in the immediate area.

Because of these outstanding issues, we feel that this proposal has inadequate environmental and geotechnical review and protections, and that the points raised above, as well as issues of spoil containment, road grading, consolidated access points, and erosion control would need to be addressed before proceeding any further with this application.

Thank you for your help, and please keep us informed of any developments, studies or new information concerning this application.



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