

# Midcoast Community Council

*An elected Advisory Council to the San Mateo County Board of Supervisors  
representing Montara, Moss Beach, El Granada, Princeton, and Miramar*  
P.O. Box 248, Moss Beach, CA 94038-0248 - [www.MidcoastCommunityCouncil.org](http://www.MidcoastCommunityCouncil.org)

**Chris Johnson**   **Lisa Ketcham**   **Dan Haggerty**   **Erin Deinzer**   **Dave Olson**   **Laura Stein**   **Claire Toutant**  
Chair                      Vice-Chair                      Secretary                      Treasurer

Date: June 8, 2016

To: Dennis Aguirre, Project Planner

Cc: SMC Planning Commission  
Camille Leung, SMC Planning Dept  
Renée Ananda, CA Coastal Commission staff

From: Midcoast Community Council/ Chris Johnson, Chair

Subject: **PLN2015-00152, new single family dwelling & 2<sup>nd</sup> unit at 3<sup>rd</sup> Ave, Miramar**

The Midcoast Community Council (MCC) first became aware of the May 25, 2016, Planning Commission staff report and Mitigated Negative Declaration (NegDec) for this project when it was published online May 18, leaving inadequate time for the Council to consider and submit comments for that hearing.

Whenever a NegDec for a Midcoast project is released for public review, please notify the MCC at [midcoastcommunitycouncil@gmail.com](mailto:midcoastcommunitycouncil@gmail.com) with a link to the documents. Whenever a staff report states that the MCC was notified of a public hearing, please verify that notice actually was sent and in a timely manner, either by mail or email. Any statement in this or other staff reports that the MCC was notified is unwarranted if the MCC must depend solely on publicly posted agendas.

**Our concern with this project focuses on the portion of the house located below the bank of Arroyo de en Medio.** Although recent development has been permitted increasingly close to Medio creek, this house is the first to be proposed for development down within the floodplain of the arroyo where the creek channel naturally shifts its alignment over time. Adequate setbacks must be maintained in order to allow for natural processes to occur without damage to structures.

The site plan for this project indicates a natural “grade break” which is proposed to be graded and a retaining wall added where the house is stepped down to its lower level. This “grade break”, approximately 8 feet high, is the bank of Arroyo de en Medio. In the original 1907 subdivision the irregular parcel line meandering down Arroyo de en Medio indicates the location of the creek channel at that time when it was directly adjacent to the southwest corner of this parcel. Over the years the creek channel has moved and no longer coincides with the parcel lines.

The soil boring by Sigma Prime on the “lower bench” (within the arroyo) showed 11 feet of loose sand underlain by 9 feet of very stiff sandy clay, with groundwater encountered at 6.4 feet. The NegDec does not address the issue of a shifting creek channel within the loose sand of the arroyo where the house is proposed to be located.

The May 2016 Sigma Prime estimate of impacts of upstream dam failure considers the dam volume as negligible when spread out over the entire watershed. The NegDec does not address how the terrain of the watershed would channel all runoff into the arroyo, backing up the flow where Highway 1 blocks the ravine, with sustained full flow through the culvert onto the flood plain of the arroyo where the house is proposed.

The 2007 subdivision that created this parcel, and the one adjacent, used the creek channel alignment surveyed in 2006 to define a non-development zone for the two new parcels. In approving the subdivision there was no consideration of the historical movement of the creek channel within the floodplain of the arroyo. The bank of the arroyo is not even shown on the survey map. Given the additional constraint of providing access easement to the third parcel, it would seem this subdivision should have been limited to two parcels in order to provide adequate safe buildable area.

MCC recommends the house be redesigned to avoid location within the historical floodplain of Arroyo de en Medio in order to be consistent with the hazards policies of the Local Coastal Program.

Thank you for your consideration of these comments.