

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

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

Date: November 9, 2016
To: Dennis Aguirre, Project Planner
Cc: Supervisor Don Horsley
Camille Leung, SMC Planning Dept
Marlene Finley, SMC Parks Director
Renée Ananda, CA Coastal Commission staff
From: Midcoast Community Council/ Chris Johnson, Chair
Subject: **PLN2016-00444, new single family dwelling on coastal bluff at 199 Arbor Ln, Moss Beach**

Thank you for the early referral of this application. Our comments focus on public coastal access and erosion hazards of the site, which has near vertical sandy coastal cliffs on the west, and the steep bank of Sunshine Valley, at the mouth of Dean Creek, on the south.

A coastal erosion study is needed which includes assessment of hazard exposure to the year 2100 including increased rate of erosion due to sea level rise, consistent with the Coastal Commission 2015 Sea Level Rise Policy Guidance document. A longer planning horizon facilitates the identification of triggers for adaptation measures, since it is unlikely that the development would be removed at the end of the proposed 50-year lifespan. LCP Policy 9.8(d) prohibits new structures that rely on shoreline protection now or in the future.

The drainage plan (C-1 Berry & Associates) shows the existing top of bluff approximately 44 feet west of the property line and locates a resulting 50-foot ocean bluff setback on the plan; however, the survey and site plan (Carlos Zubieta, 2016) show top of ocean bluff only 30 feet west of the property line. The 1972 Cypress Cliffs Subdivision survey map shows top of ocean bluff approximately 67 feet from Lot 12 property line (199 Arbor Lane), which would indicate approximately 37 feet of bluff recession at the site in the last 44 years.

Next door to the north, coastal armoring was needed to protect 198 Arbor Lane only ten years after construction. The Initial Study for CDP83-13 notes that the bluff consists of unconsolidated sandy soil subject to erosion from ocean waves and surface runoff.

To the south, on the other side of Sunshine Valley, CCC appeal of major remodel at 263 Nevada addressed coastal erosion: "The Commission's Senior Geologist concludes that the recommended 50-year coastal blufftop setback for the project site would be 80.3 feet" (CCC 12/13/2012 staff report, p.18). Special Condition #3 (p. 8) is an Assumption of Risk, Waiver of Liability, and Indemnity Agreement whereby the permittee agrees on behalf of himself and all successors and assigns to assume all risks of coastal hazards. Future armoring is prohibited and removal of development required when it becomes unsafe to occupy.

Public coastal access opportunity is described on the attached slide.

Thank you for your consideration of these comments. Please keep us informed of future studies and modifications of this project.