

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** **Erin Deinzer** **Dave Olson** **Laura Stein** **Claire Toutant**
Chair Vice-Chair Secretary Treasurer

Date: October 26, 2016

To: Dave Holbrook, San Mateo County Planning Dept

CC: Supervisor Don Horsley
Owen Lawlor, Lawlor Land Use
Renée Ananda, Coastal Commission Program Analyst
Marlene Finley, San Mateo County Parks Director

From: Midcoast Community Council/ Chris Johnson, Chair

Subject: **Vallemar Bluff 5-house revised application - PLN2015-00380 -**
for 2.5-acres zoned RM/CZ, at Vallemar & Juliana, Moss Beach

At the regular October 26, 2016, MCC meeting, revised plans and new studies were considered for a 5-house project which deletes the house on Lot B, and requests a variance for Lot D for 35-foot front setback, where 50 feet is required. As follow-up to December 2015 MCC comments on the 6-house project, we emphasize the following concerns:

Environmental Impact Report: Due to potential significant environmental impacts and substantial public controversy, a focused EIR should be prepared in order to provide an analysis of alternatives that identifies the least environmentally damaging feasible alternative.

Coastal prairie is a rare and especially valuable native grassland habitat that supports several rare and endangered species and plays an important role in the ecosystem. The LCP prohibits residential development within sensitive habitat areas (Policies 7.1, 7.3, 7.4). The entire coastal prairie habitat area on Vallemar Bluff as mapped by botanist Toni Corelli, and buffer zones, should be permanently protected.

MCC recommends that this conservation area be donated to County Parks to ensure long-term stewardship with opportunity for community volunteers to participate.

Shoreline Retreat: Undeveloped bluff top open space is essential to allow for natural coastal erosion that will ensure the long-term preservation of the extraordinary wild beauty of Vallemar Bluff's eroded sandstone cliffs and dark rocky shoreline, with emerging granite boulders and sandy cove. We must not lose this beauty and public coastal access to emergency armoring for protection of development whose economic life is realistically well beyond 50 years. Alternatively, allowing but requiring removal of ill-advised development when it becomes threatened will leave grade level and subsurface development detritus to become the new erosion aesthetic of these coastal cliffs.

Development on Lot D is not allowable due to site constraints of bluff erosion, sensitive coastal prairie habitat, public coastal views from Juliana, public coastal access and the need for the trail to migrate inland with bluff retreat. The front setback variance purports

to conserve coastal prairie but worsens public coastal view impacts while improving views from adjacent Lot E. The deeply flawed County process that created the mostly unworkable configuration of seven lots ignored all site environmental and hazard constraints and existing RM zoning minimum parcel size. County Counsel recommended that a letter be recorded with the Record of Survey noting that “future buyers should be aware that the Record of Survey does not imply that the resultant parcels are buildable.”

MCC recommends that all proposed development be sited along Vallemar St. among the mature cypress trees, allowing 20-foot front setback variance for all lots. This will reduce impact on coastal prairie habitat and significantly reduce coastal erosion hazard for these homes over their economic lifetime. Each house would have a permanently unobstructed coastal view. The EIR should consider this as the least environmentally damaging feasible alternative.

Thank you for consideration of these comments.

Attachments: Coastal Prairie & rare plant habitat outline map by Toni Corelli, Botanist
MCC comments December 9, 2015

For all other referenced documents, please see
www.midcoastcommunitycouncil.org/vallemar-bluff/



Outline of
Coastal Prairie and
Rare Plant Habitat
Vallemar Bluff,
Moss Beach
Toni Corelli, Botanist

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Chris Johnson **Lisa Ketcham** **Dan Haggerty** **Erin Deinzer** **Dave Olson** **Laura Stein** **Claire Toutant**
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Date: December 9, 2015

To: Dave Holbrook, San Mateo County Planning Dept

CC: Owen Lawlor, Lawlor Land Use
Nancy Cave, District Manager, CA Coastal Commission
Marlene Finley, San Mateo County Parks Director

From: Midcoast Community Council/ Chris Johnson, Chair

Subject: **Valleamar Bluff Pre-Application Workshop - PLN2015-00380** -
6 new homes on 2.5-acre property zoned RM/CZ, at Valleamar & Juliana

Thank you for holding the Pre-Application Workshop for this project, conveniently at the MCC's December 9 meeting. The MCC and the community were deeply involved in prior development proposals for the Valleamar Bluff property from 1997-2001 and we have collected past and current records on a page on our website devoted to this issue.¹

Key issues for this project are:

- Protect sensitive habitats as defined in LCP Policy 7.1 and buffer areas. Coastal Prairie and rare plant habitat is mapped by Botanist Toni Corelli over at least a third of the site.
- Require adequate setback from bluff edge per LCP Policy 9.8, including tsunami events and increased erosion from sea level rise. Prohibit future shoreline armoring to protect the proposed development.
- Ensure existing public access along the bluff is maintained through provision of a "floating easement" that will move inland as bluff retreat occurs.
- Avoid impacting bluff stability and Marine Reserve water quality with increased surface and subsurface water flow draining at the cliff.
- Ensure that new development best preserves the visual and open space qualities of the site, per LCP Policy 8.5.

The underlying problem in addressing these issues is the number and configuration of lots on the 2.5-acre property. A County staff decision, with no public notification (1991 Lot Line Adjustment LLA-89-21), created seven lots out of the 40 laid out in the 1908 subdivision. In determining the number and configuration of the lots, there was apparently no consideration of the RM/CZ five-acre minimum lot size requirement in place since 1973, nor the hazard/environmental constraints of the site. County Counsel noted in 1990 "that future buyers should be aware that the recordation of the Record of Survey does not imply that the resultant parcels are buildable."² Coastal Commission

¹ <http://www.midcoastcommunitycouncil.org/valleamar-bluff/>

² Letter to Richard Charnock re tentative approval of LLA 89-21, 10/22/1990.
<http://www.midcoastcommunitycouncil.org/storage/issues/plns/valleamarbluff/1990-10-22-VB-LLA-county-letters.pdf>

1998 staff report noted that the seven parcels created by LLA may actually require a merger and resubdivision subject to Coastal Development Permit approval.³

Reconfiguring and reducing the number of parcels, locating the houses along Vallemar among mature cypress trees, and permanently protecting the sensitive habitats, public trail, and bluff/cliff retreat area through an enforceable restriction such as a Conservation Easement would allow advantageous use of the property without significant adverse impacts. The result would provide lasting value for the property owners through more long-lasting protection from coastal erosion, and permanently unobstructed coastal views from each house.

Thank you for consideration of these comments.

³ CCC staff report A-1-SMC-98-049, p. 13, 10/16/1998
<http://documents.coastal.ca.gov/reports/1998/11/F7a-11-1998.pdf>