

Midcoast Community Council

*An elected Advisory Council to the San Mateo County Board of Supervisors
representing Montara, Moss Beach, El Granada, Princeton, and Miramar*

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Chair Vice-Chair Secretary Treasurer

Date: July 26, 2017

To: Dave Holbrook, Project Planner

Cc: Owen Lawlor, Lawlor Land Use
Sarah Birkeland, SMC Parks Interim Director
Renée Ananda, CCC Coastal Program Analyst
Coastside Design Review Committee

From: Midcoast Community Council/ Lisa Ketcham, Chair

Subject: **Vallemar Bluff 4-house revised application - PLN2015-00380 –**
for 2.5-acres zoned RM/CZ, at Vallemar & Juliana, Moss Beach

Thank you for the referral and opportunity to comment on the latest revision of this project, which proposes a reduction to four houses on four lots fronting on Vallemar Street. As follow-up to October 2016 MCC comments on the 5-house project, we have the following comments and concerns.

Overall, the revisions are very positive, specifically the elimination of the house nearest the shoreline on Juliana, elimination of three unbuildable lots, and orientation of four reconfigured lots along Vallemar Street. This will provide each home with unobstructed ocean views and more long-lasting protection from coastal hazards. More native grassland area is included in the proposed conservation easement, with the promise of a deed-restricted provision to trigger timely relocation of private fencing inland to allow retreat of the coastal trail onto private property as the sea cliff erodes.

Biotic easement perimeter fence: A condition of approval should be added that requires determination of a safe minimum width for the public trail easement between cliff edge and private fence, which distance should also be included as deed restrictions on the four lots. Included in the deed restrictions should be provision for the County to monitor and enforce any necessary relocation of the private fence. Please also add condition of approval requiring minimum 50% transparency for this fence.

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 on Vallemar Bluff, including transition zones, should be permanently protected. The attached map by Botanist Toni Corelli shows mapped locations of two of the rare plant species growing there. The presence of a single plant indicates a seed bank is present in that area. The revised project impacts the sensitive habitat by lack of buffer zones, by encroachment of the Lot 1 house, and by location of extensive drainage infiltration trenches seaward of the houses within the sensitive habitat.

50-foot front setbacks and the sprawling arrangement of some of the structures results in encroachment on coastal prairie habitat. Previous plans included some homes with 20-foot side setback on Vallemar, and a 35-foot front setback variance on Juliana, ostensibly to protect habitat. This clearly demonstrates the applicant's flexibility to site the homes to fully protect sensitive habitat. MCC previously requested that all development be sited along Vallemar among the mature cypress trees, allowing 20-foot front setback variances. Even a 30- or 40-foot front setback would enable greater protection for sensitive habitat and more adequate buffer zone. Moving the western edge of the development footprint toward Vallemar Street could also be accomplished by shrinking building square footage, condensing the footprint by closing the space between house and garage (as done on Lot 2), and perhaps by sharing driveway access and the grading it entails.

Building height/mass: MCC supports the request for reduced building height and square footage by Coastside Design Review Committee (CDRC) in their first hearing on the project (7/13/2017). From the scenic highway corridor, the natural downhill grade of the site reduces visual impacts of development, but from the public coastal bluff trail and beach, the out-of-scale height and mass of the four houses is in full view. Their 32.5-foot height rises straight up above the grassland, looming over the scenic natural area. There is no space for tall landscape screening on this side and the homeowners will want their clear ocean view.

Coastal hazard conditions should be included, consistent with Coastal Commission requirements for other shoreline development, particularly in light of Sea Level Rise.

- Prohibit future shoreline armoring.
- Require removal of development if it becomes unsafe to occupy due to threat of coastal hazards.
- Require removal of debris that falls from blufftop onto beach.
- Require assumption of all risks of coastal hazards, waiver of liability, and indemnification agreement.
- Require recordation of deed restriction imposing coastal hazard conditions as covenants, conditions and restrictions on the use and enjoyment of the property.

