

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

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

Date: August 23, 2017

To: Carmelisa Morales, Project Planner

Cc: Renée Ananda, CCC Coastal Program Analyst

From: Midcoast Community Council/ Lisa Ketcham, Chair

Subject: **199 Arbor Lane, Moss Beach, new single-family dwelling on coastal bluff
- PLN2016-00444 (APN 037-123-430)**

West of this bluff top site is a near-vertical sandy coastal cliff, and immediately adjacent on the south is the steep eroding bank of Sunshine Valley (Dean Creek) where it meets the ocean.

MCC stressed the need for a coastal erosion study in our initial comments on 11/9/2016. Assessment of hazard exposure should include increased rate of erosion due to sea level rise, consistent with the Coastal Commission 2015 Sea Level Rise Policy Guidance document. Longer planning horizon to the year 2100 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.

These are follow-up comments on this project:

Coastal hazard conditions of approval 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.

These conditions are applied to development that may not currently be on the shoreline parcel, such as Aug 2014 CDP for 354 & 358 Princeton Ave.

<http://documents.coastal.ca.gov/reports/2014/8/F10a-s-8-2014.pdf>

These conditions should also apply to the adjacent cliff face of Sunshine Valley (Dean Creek). County Planning staff 6/4/1997 correspondence regarding a well for this site indicated development setbacks from the creek bluff top must comply with LCP Policy 9.7 (now 9.8), Regulation of Development on Coastal Bluff Tops.

May 2016 site survey shows proposed rear deck approximately five feet from top of bank of Sunshine Valley. Updated bluff recession measurements should be sure to indicate the actual cliff face and not include any undercut surface areas.

Coastal Commission Senior Geologist concluded the recommended blufftop setback at nearby 263 Nevada would be 80 feet (CCC 12/13/2012 staff report, p. 18)

<http://documents.coastal.ca.gov/reports/2012/12/Th12b-12-2012.pdf>

July 2016 Michelucci geotech report recommends fortifying the foundation against bluff retreat with deep-drilled piers. These piers may make it difficult to move the house when bluff retreat encroaches. They will become a hazard when the bluff eventually erodes around them.

Thank you for the opportunity to comment. Please keep us informed of future studies and modifications of this project.