

# 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)

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Date: May 9, 2018  
To: Carmelisa Morales, Project Planner  
Cc: Renée Ananda, CCC Coastal Program Analyst  
From: Midcoast Community Council/ Dave Olson, Chair  
Subject: **Arbor Lane, Moss Beach, new single-family dwelling on coastal bluff --  
PLN2016-00444 -- Mitigated Negative Declaration**

MCC issues of concern regarding this project remain basically the same as our 8/23/17 comments: coastal bluff instability and erosion, both on the near-vertical sea cliff to the west, and the steep bank of Dean Creek ravine on the south, which is also subject to compliance with LCP Policy 9.8, Development on Coastal Bluff Tops.<sup>1</sup>

Assessment of coastal 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. The minimal 50-year horizon is unrealistically short for the economic life span of residential development. Longer planning horizon to the year 2100 facilitates the identification of triggers for adaptation measures, which will be needed as the cliffs approach the residence.

Michelucci 8/29/17 geologic investigation update reported a maximum 11 feet of ocean bluff retreat at the site during winter 2016/17. While this episodic event may not affect average annual bluff retreat estimates, it does affect the starting point for the proposed development. Distance from bluff edge to building (ignoring the wood deck) is reduced from 77 to 66 feet. This changes the estimated time for bluff erosion to reach the house to 53 yrs @1.25 ft/yr or 84 yrs @0.78 ft/yr. Coastal Commission Senior Geologist concluded the recommended 50-year coastal bluff-top setback at nearby 263 Nevada should be 80 feet, including 63 feet due to erosion (at 1.26 ft/yr), 12 feet due to slope stability, and 5 feet due to sea level rise.<sup>2</sup>

Cliff retreat at Dean Creek ravine should be more carefully analyzed for recommended setback for the economic life of the project without the possibility of armoring the bluff. The "top-of-bank" of the ravine is shown on the site plan about 18 feet from the proposed house. Portions of the upper bank are very steep and undercut in places, with tree roots exposed. If and when the large cypress trees fail, they will likely take a

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<sup>1</sup> County Planning staff correspondence, 6/4/1997

<sup>2</sup> California Coastal Commission staff report, 12/13/2012, p. 18,  
<http://documents.coastal.ca.gov/reports/2012/12/Th12b-12-2012.pdf>

large chunk of the bluff with them, leaving bare loose soil exposed. Neighborhood residents report that developed parcels on both sides of the ravine have experienced gradual and episodic bluff retreat.

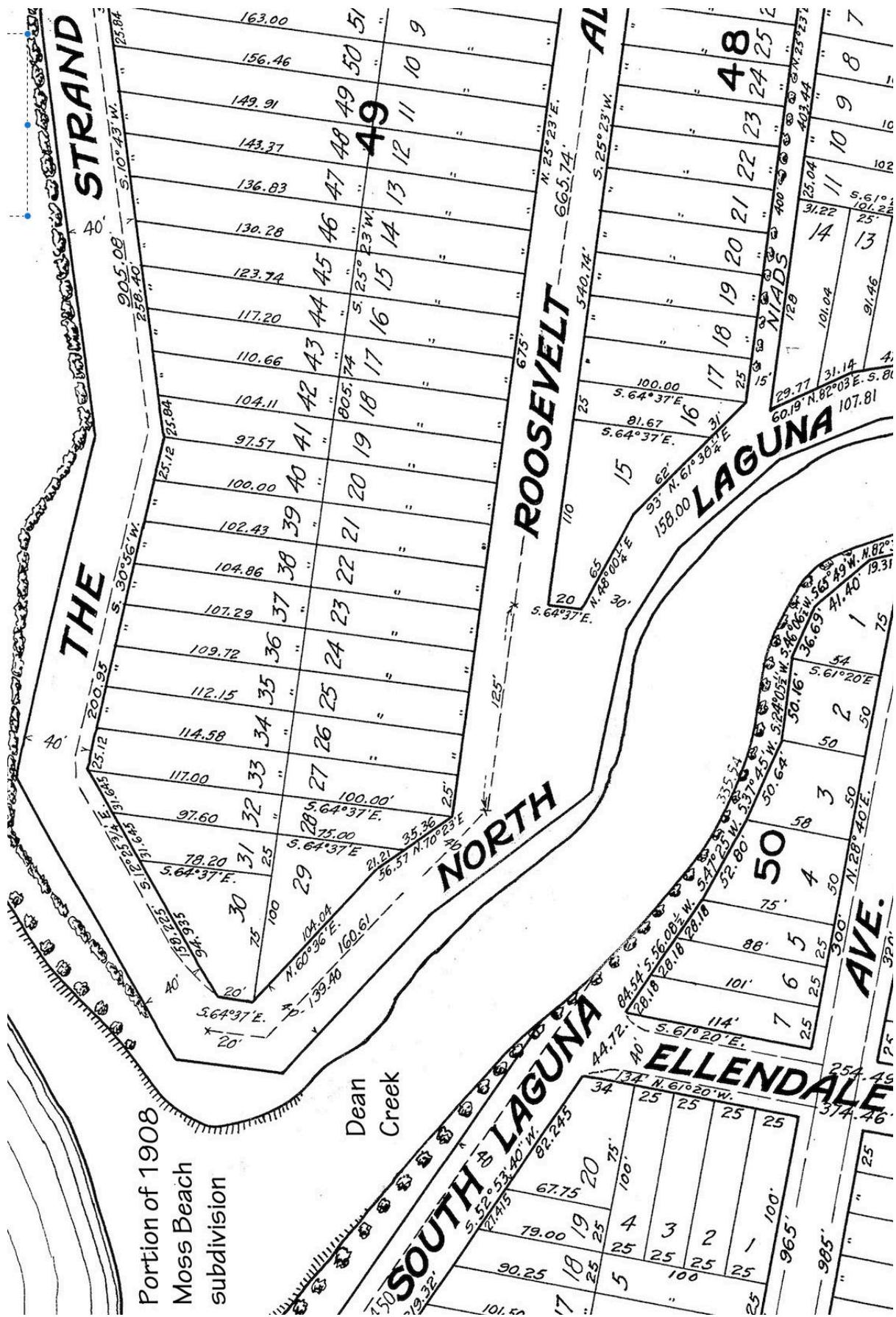
The 1908 Moss Beach subdivision map includes 40-ft-wide North and South Laguna Streets along either side of the ravine. South Laguna has mostly eroded away and North Laguna was never built. The Arbor Lane 1972 subdivision includes a 20-ft-wide scenic easement along the north bank of Dean Creek ravine. This was the northern half of the 1908 street easement, and several feet of it are now below the top-of-bank per the project survey. The 1908 subdivision map compared to the 2016 survey for the project indicates the top-of-bank retreated about 30 feet (average 0.27 ft/yr). The proposed 18-ft development setback is not much leeway next to a 28-ft drop-off. This estimate shows the top-of-bank would retreat to within 10 feet of the house in 30 years. How much bluff retreat could be tolerated before protective or adaptation measures would need to be taken?

Mitigation #14, requires deep-drilled piers to fortify the foundation against bluff retreat, as recommended in the Michelucci Geotechnical Report. These piers will make it more difficult to move the house and restore the site when bluff retreat encroaches. A recent example of the resulting hazard and sea-cliff damage from foundation piers exposed by bluff erosion occurred at the Ritz Carlton in Half Moon Bay. This is an additional significant impact.

LCP Policy 9.8 prohibits new structures that rely on shoreline protection now or in the future. The Neg/Dec does not discuss environmental impacts of coastal armoring. Coastal hazard conditions of approval should be included for the coastal bluff on both west and south, consistent with Coastal Commission requirements for other shoreline development:

- 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 bluff top 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.

Thank you for the opportunity to comment.



Portion of 1908  
Moss Beach  
subdivision

Dean  
Creek