



December 8, 2021

Lisa Ketcham, Chair and
Members of the Planning Commission
455 County Center, 2nd Floor
Redwood City, CA 94063

Re: Item #5 on December 8, 2021 Agenda: PLN2020-00043. Coastal Development Permit, Design Review, Non-Conforming Use Permit and Variance to allow construction of an 1,861 sq. ft. single family residence with 423 sq. ft. garage with reduced front setback of 14 feet, 8 inches where 20 feet is required, and increase in allowable site coverage from 25 percent to 32 percent on a 4,761 sq. ft. non-conforming legal parcel in the Seal Cove Geological Hazards District. Applicant: SunCal Properties and Investments Partnership LLC. APN 037-278-090

Dear Chair Ketcham and Commissioners,

Thank you for continuing this item in order for the Applicant to supply more information as to the adequacy of the Bluff Retreat projections, taking Sea Level Rise into consideration.

As noted in the October 12, 2021 letter from Louis Richardson (Richardson Report), there are two major deep-seated landslides in close proximity to the subject property; (1) to the north in Seal Cove, and (2) a short distance to the south, located on Pillar Point Bluff/County Parks property. There should be a more thorough analysis of the potential for the subject property to experience similar deep-seated landsliding. The Richardson Report also notes that one of the major erosion mechanisms leading to failure of the bluff is groundwater emerging as springs along the contact zone between the marine terrace permeable soils and the resistant less permeable bedrock of the Purisima Formation. This area of Seal Cove only has individual stormwater systems on individual properties to collect and dispose of stormwater runoff. As more and more vacant lots are developed, with increased impermeable surface areas and only on-site individual stormwater collection/dispersion systems, increased groundwater will seep out at the contact zone along the bluff/cliff face, and exacerbate the cliff/bluff retreat, through sloughing and slumps, debris slides, and larger block failures along the upper 20 feet of the bluff.

We also would like to point out that the previous November 30, 2020 Richardson Report describes the erosion of the Purisima Formation as: "Erosion of the lowest portion of the bluff along this reach of Ocean Boulevard is primarily caused by wave action during high tides or storms. Weak, fragile sedimentary rocks such as the Purisima Formation tend to be easily eroded by waves, causing block falls, and debris slides on the cliff-life bluff face." Yet the bluff retreat analysis does not factor in any slope stability issues or bluff/cliff retreat resulting from the wave action, block falls and debris slides associated with the Purisima Formation over time.



Another major concern is that the subject property is wholly dependent upon Ocean Boulevard for access as well as essential utilities, notably the sewer main which must be extended along Ocean Boulevard to serve this property. A critical issue for this property will be availability of necessary public services when coastal bluff erosion/cliff retreat ultimately impacts Ocean Boulevard, since armoring of the coast to protect new development such as this is impermissible under the LCP and Coastal Act.

Our final concerns are regarding the Variance findings for the proposed project. It would not be a hardship for the Applicant to reduce the site coverage from the requested 32% to the required 25%, particularly in light of the importance of minimizing impervious surfaces in this particular location which lacks municipal stormwater collection systems. Compliance with County lot coverage standards is certainly possible; a smaller lot such as this one that will have a two-story house, can comply with the 25% maximum lot coverage. There are quite a few other parcels in the Sea Cove area that are also less than 5,000 square feet. Variance Finding #1 that the parcel's size varies substantially from those of other parcels in the same zoning district cannot be met. We do not object to the reduction of the minimum front yard setback, but the requested Variance in this particular location should not be approved.

Thank you for consideration of our comments.

Sincerely,

A handwritten signature in black ink that reads "Lennie Roberts".

Lennie Roberts, Legislative Advocate, Green Foothills