

CALIFORNIA COASTAL COMMISSION

NORTH CENTRAL COAST DISTRICT OFFICE
45 FREMONT, SUITE 2000
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(415) 904-5260 FAX (415) 904-5400
www.coastal.ca.gov

F4

NORTH CENTRAL COAST DISTRICT DEPUTY DIRECTOR'S REPORT

For the

March Meeting of the California Coastal Commission

MEMORANDUM

Date: March 7, 2008

TO: Commissioners and Interested Parties
FROM: Charles Lester, North Central Coast District Deputy Director
SUBJECT: *Deputy Director's Report*

Following is a listing for the waivers, emergency permits, immaterial amendments and extensions issued by the North Central Coast District Office for the March 7, 2008 Coastal Commission hearing. Copies of the applicable items are attached for your review. Each item includes a listing of the applicants involved, a description of the proposed development, and a project location.

Pursuant to the Commission's direction and adopted procedures, appropriate notice materials were sent to all applicants for posting at the project site. Additionally, these items have been posted at the District office and are available for public review and comment.

This report may also contain additional correspondence and/or any additional staff memorandum concerning the items to be heard on today's agenda for the North Central Coast District.

DE MINIMIS WAIVERS

1. 2-08-006-W Sonoma County Regional Parks, Attn: Pamela Higgins (Bodega Bay, Sonoma County)

TOTAL OF 1 ITEM

DETAIL OF ATTACHED MATERIALS

REPORT OF DE MINIMIS WAIVERS

The Executive Director has determined that the following developments do not require a coastal development permit pursuant to Section 30624.7 of the California Coastal Act of 1976.

<i>Applicant</i>	<i>Project Description</i>	<i>Project Location</i>
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2-08-006-W

Sonoma County Regional
Parks, Attn: Pamela Higgins

Replace and repair damaged and worn sections of the Spud Point Marina fuel dock facility, including most of wood siding (walers) along the length of the fuel dock and damaged pile guides. Specifically, the project includes the removal and replacement of all dock wood siding, and replacement of the through- rods that hold the dock together. The replacement wood will consist entirely of Douglas fir that has been ACZA (Ammoniacal-copper-zinc-arsenate) pressure-treated and kiln dried. All metal fittings used for repairs will be made of galvanized steel, and all project repair components will be pre-treated and pre-drilled prior to on-site replacement installation. Six pile guides will be replaced with fabricated heavy-duty galvanized steel guides, with rub blocks made of ultra-high molecular weight (UHMW) plastic. Dock bumpers and corners will be replaced with new bumpers made of heavy-duty commercial bumper material. All of the existing dock cleats will be removed and replaced with 18-inch galvanized steel cleats. No replacement or repair for the six existing dock pilings is covered by this permit. Construction activities shall be conducted as follows: 1) A floating dock will be used for access to the removal and replacement of the dock through-rods and the wood siding. 2) The dock piling top caps will be removed by the contractor to facilitate the removal and replacement of the pile guides, and the dock hose will be temporarily detached from the pilings to allow access to pilings. 3) The contractor will use electric power tools accessing the fuel dock electric outlets to conduct the repairs. 4) The contractor will use no chemicals, including glue or epoxy, in conducting the fuel dock repair project. 5) A containment ring extending 1-foot from the dock will be installed during construction to prevent sawdust and/or particulates from entering the water during removal and installation activities. 6) No drilling or cutting of pressure treated material shall be done on the dock and must be done sufficiently far onshore such that no dust can enter the harbor waters or any stormdrains. Groundcover must be placed under the location of any drilling or cutting of the pressure treated wood so that all dust and wood scraps can be fully removed from site. Removed wooden dock materials, as well as dust or scraps of new pressure treated dock materials shall be disposed of at a facility designed for such waste. Contractor shall inform, in writing, Sonoma County Regional Parks of where the material is disposed. 7) Any pressure treated materials stored onsite during construction shall be kept in a fully enclosed space or wrapped tightly in water proof material to prevent any potential runoff from rain exposure and prevent exposure to animals. 8) Project work will be completed using Best Management Practices in compliance with the Construction Site Best Management Practices Manual guidelines. Work will be completed by August 1, 2008.

1818 Westshore Road, Bodega Bay (Sonoma County)

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NORTH CENTRAL COAST DISTRICT
45 FREMONT, SUITE 2000
SAN FRANCISCO, CA 94105-2219
VOICE AND TDD (415) 904-5260
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**Memorandum****February 29, 2008****To:** Commissioners and Interested Parties**FROM:** Charles Lester, Deputy Director
North Central Coast District**Re:** **Additional Information for Commission Meeting Friday, March 7, 2008**

<u>Agenda Item</u>	<u>Applicant</u>	<u>Description</u>	<u>Page</u>
F6a, A-2-PAC-07-022	(Pacifica Beach LLC, Pacifica)	Ex-Parte, Karen Rosenstein	1
F6a, A-2-PAC-07-022	(Pacifica Beach LLC, Pacifica)	Correspondence, Nancy Merchant	2-12
F6a, A-2-PAC-07-022	(Pacifica Beach LLC, Pacifica)	Correspondence, Todd McCune Bray	13-14
F6a, A-2-PAC-07-022	(Pacifica Beach LLC, Pacifica)	Correspondence, Patrick Rentsch	15-32

**FORM FOR DISCLOSURE OF
EX-PARTE COMMUNICATIONS**

Name or description of the project: **Appeal No. A-2-PAC-07-22 (Pacifica Beach LLC, Pacifica)**

Time/Date of communication: 8/28/07, 1pm
Location of communication: 22350 Carbon Mesa Rd., Malibu

Person(s) initiating communication: Karen Rosenstein

Person(s) receiving communication: Sara Wan

Type of communication: phone call

Karen said she was in support of the staff recommendation. She questions whether or not the geology report was sufficient and is concerned about the possible hazards associated with the project. She agrees that the applicant has not demonstrated that the seawall is designed to last the life of the project and not require re-armoring. She also believes that the flood protection improvement to raise Beach Blvd would act as a seawall to protect the development which is inconsistent with the LCP prohibiting such a structure unless it is for existing development.



Date: 8/18/07

Sara Wan

Nancy L. Merchant
77 Paloma Avenue #201
Pacifica, CA 94044-2249
(650) 359-1599
nmerch24@aol.com

RECEIVED

FEB 15 2008

CALIFORNIA
COASTAL COMMISSION

February 14, 2008

Mr. Michael Endicott
California Coastal Commission
Northern Central Coast District Office
45 Fremont Street, Suite 2000
San Francisco, CA 94105-2219

**Re: 1567 Beach Boulevard, Pacifica
A-2-PAC-07-022
Driveway Location**

Dear Michael,

As you are aware, I am very concerned regarding the placement of the vehicular access for the proposed Beach Boulevard project. I believe the submitted two-dimensional site plans do not accurately reflect the vulnerable placement of the driveway along the revetment protected bluffs. To illustrate my concerns, I am enclosing a picture of the property taken from the west looking eastward over the property with the Applicant's reduced site plan. The picture of the property is taken from the 2005 photoset of the California Coastal Records project (www.californiacoastline.org).

This picture clearly illustrates the encroachment of the driveway upon the top of the Shoreview revetment which is privately owned and maintained by the Shoreview Homeowners Association. The location of this proposed project's driveway will negatively impact the neighboring homes and adjacent bluffs to the north of this proposed project site. It is also very clear that the only vehicular access to this proposed project will be along the very edge of the bluffs using a very tight turning pattern to access the garage.

The fact that this development would partially rely on a non-City owned revetment for protection also makes this particular building unique from the existing homes along Beach Boulevard.

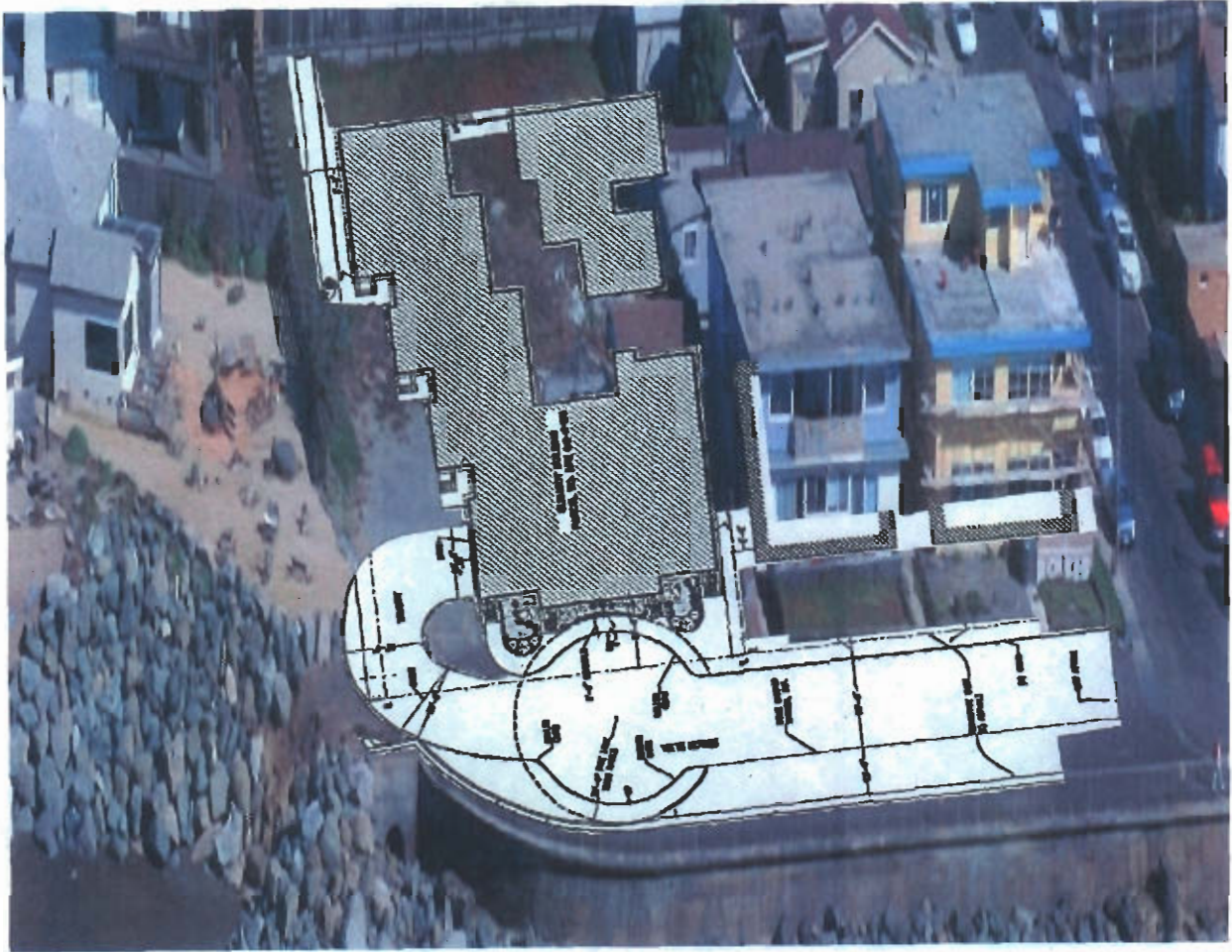
Thank you for your continued consideration of this sensitive project.

Sincerely,

Na Signature on File *ct*

Nancy L. Merchant

Encl.



1567 Beach Boulevard Site Plan on 2005 photoset of the California Coastal Records project (www.californiacoastline.org)

Item #F 6a
A-2-PAC-07-022
Appellant (opposed to project)

RECEIVED

FEB 20 2008

CALIFORNIA
COASTAL COMMISSION

Nancy L. Merchant
77 Paloma Avenue #201
Pacifica, CA 94044-2249
(650) 359-1599
nmerch24@aol.com

February 19, 2008

Mr. Michael Endicott
California Coastal Commission
Northern Central Coast District Office
45 Fremont Street, Suite 2000
San Francisco, CA 94105-2219

**Re: 1567 Beach Blvd, Pacifica (A-2-PAC-07-022)
Shoreline Protection and Coastal Hazards**

Dear Michael,

Thank you for your Staff's excellent review of the various documents involved with our Appeal. I have greatly appreciated their help along with yours in understanding and working through this process and being able to provide the CCC with what I believe is important information regarding this project.

As you know, I was very surprised to have the City of Pacifica approve this project despite the pointed statements and pictures presented to them by other concerned neighbors and myself regarding the various conflicts with Pacifica's LCP. As the project progressed through the approval process, the recommended shoreline protections have also changed.

- **10/2006** Planning Commission approved project and Mitigated Negative Declaration calling for an increase in the height of the seawall by 3.3 feet (to **~+27' MSL**)
- **05/2007** City Council approved project with elimination of increasing height of seawall, but raising Beach Blvd 2.25 feet and building a two-foot high retaining wall as flood protection improvements (to **~+27' MSL**)
- **10/2007** Subsequent to Coastal Commission Substantial Issue Hearing, elimination of all flood improvements (elevation **~+23.7' MSL**).

In the following paragraphs I am focusing on a few statements that I believe are inconsistent with the parts of Pacifica's LCP pertaining to new development in coastal areas, specifically: LCP Policy 26(a) – new development shall minimize risks to life and property; LCP Policy 26(b) – new development shall assure stability and structural integrity for the design life (100 years) of the project; and LCP Policy 16 – shoreline devices are allowed only to protect *existing* structures.

Mr. Skelly of GeoSoils, Inc., has provided engineering services to the City of Pacifica with respect to the Beach Blvd seawall/revetment system as well as the Project Applicant. Upon reviewing statements in reports for both projects, I am greatly concerned by how they differ depending on which entity is employing Mr. Skelly's services.

- Seawall Height and Overtopping
 - (City Jan. 2002) "By direct observation the RE wall, even at +29' MSL, is overtopped."¹
 - (Applicant May 2004) "The revetment/seawall system needs to be at least to +25 feet MSL in height to provide full protection to Beach Boulevard and the site."²
- Integrity of Existing Seawall and Design Life of Project:
 - (City Sept. 2007) Regarding CDP 2-07-028, "The monitoring of the quarry stone as a condition of CDP 2-01-026 was not performed." and "There is suspicion that the structure was not built to the design depth due to constructability issues."³
(City Nov. 2007) "The piping out of soils behind the RE wall has resulted in voids beneath the Promenade behind the RE wall and jeopardizes the integrity of the RE wall."⁴
 - (Applicant Mar. 2007) "No additional shore protection would be needed in the next 75 years."⁵ and, following the elimination of any flood improvements, (Applicant Oct. 2007) "Wave runoff and overtopping will not significantly impact this site over the life (100 years) of the proposed improvements."⁶

During a year's worth of hearings it was never mentioned by either the City of Pacifica or Geo-Soils, Inc. (Mr. Skelly) that they were aware that overtopping occurs even at the highest elevation of the seawall. Since **overtopping does occur at +29' MSL** and any new shoreline devices are prohibited by the LCP, **the project would not be adequately protected from hazards**. As pointed out above, the current proposal now calls for the elimination of all previously-proposed flood improvements. The safety of the proposed project without additional shore protection has been contradicted in all the prior reports. Eventual shoreline protection is all but inevitable. **There is also uncertainty as to the ability of the current seawall/revetment to protect both new and existing properties for the life of the new development.**

Lastly, **pedestrian safety and access for emergency providers**, especially during severe overtopping events, have not been addressed by the Applicant. According to Fire Marshal Steve Brandvold, when the "waves are crashing in people's front yards, we don't send the apparatus (vehicles) in. That would be crazy."⁷ During overtopping, the homeowners' vehicles will most likely be prohibited by the street closure and/or sandbags at the top of the garage. Now these homeowners will become pedestrians whose only legal access to their homes would be through this crumbling, ill-protected, windswept – and possibly dark – water- and debris-spraying area. The Sharp Park area of Pacifica is often hard-hit with power outages. (During the storms on January 4, 2008, the power was out for 18 continuous hours, and Beach

Blvd was closed for at least three days.) Of the 20 existing homes fronting Beach Blvd north of the pier, at least 13 have access from a side street and/or rear entry, and most of the remainder are closer to a side street than this project is. Most of these existing homeowners have built short retaining walls to help deflect the onslaught of debris-filled storm seawater coming at their houses.

Attachment 1 provides two recent pictures showing overtopping and flooding along the higher (~+27' to ~+29' MSL) elevations of the seawall.

In closing, none of the alternatives proposed by Applicant comply with the LCP in regards to mitigating risks to life and property and assuring long-term structural integrity.

Thank you very much for your time and hard work on this project.

Sincerely,

Signature on File

Signature on File

Nancy L. Merchant

Encl. Attachment 1 – Photographs

Attachment 2 – Excerpts from Engineering Documents

¹ "Response to California Coastal Commission CDP 2-01-026, City of Pacifica," Letter from Skelly Engineering to Scott Holmes, Director of Public Works, City of Pacifica, January 14, 2002. (p.8)

² "Coastal Hazard Study Proposed Legacy Quest Condominiums, 1567 Beach Boulevard, Pacifica," Letter from GeoSoils Inc. to Joel Baldwin, Earth Investigation Consultants, May 5, 2004. (p.7)

³ "Beach Boulevard, Pacifica, Response to Coastal Commission Information Request for CDP 2-07-028; Letter from GeoSoils Inc. to Director of Public Works, City of Pacifica, September 19, 2007. (p.1 and 2)

⁴ "Beach Boulevard Shore Protection Observation & Repair Recommendations, Pacifica, San Mateo County. REF: PW 3436-0 (FEMA-1628-DR-CA);" Letter from GeoSoils Inc. to Director of Public Works, City of Pacifica, November 7, 2007. (p.1)

⁵ "Additional Discussion of Coastal Hazards and Potential Impacts, Pacific Beach Condominiums, 1567 Beach Boulevard, Pacifica, California," Letter from GeoSoils (David Skelly) to Lee Diaz, Assistant Planner, City of Pacifica, March 2, 2007. (p.6)

⁶ "Discussion of Sea Level Rise Impacts on Pacific Beach Condominiums, 1567 Beach Boulevard, Pacifica, California," Letter from GeoSoils (David Skelly) to Ms. Nadia Holober, October 22, 2007. (p.8)

⁷ Personal communication between Nancy Merchant and Fire Marshal Steven Brandvoid (19 years experience in Pacifica), February 6, 2008.

**ATTACHMENT 1
Photographs**

**Item #F 6a
A-2-PAC-07-022
Appellant Merchant**



**Beach Blvd North of Pier
Severe Overtopping**

**Photo by Mojos Coast
Jan. 4-6, 2008**

Also note the water level of the non-overtopping waves and the sizable debris in the foreground.

**ATTACHMENT 1
Photographs**

**Item #F 6a
A-2-PAC-07-022
Appellant Merchant**



**Beach Blvd South of Pier
Flooding at Elevation ~+29'**

**Photo by Mojos Coast
Jan. 4-6, 2008**

Excerpts from Mitigated Negative Declaration

08/09/06

"A coastal hazard study for the subject site was also performed by Skelly Engineering in May 2004. According to Skelly Engineering, the Beach Blvd. revetment and wall system is severely overtopped at elevations of about +23 feet MSL. The overtopping occurs on average a few times per year. The wave driven water coming over the top of the wall is observed to be between 1 to +2 feet in height. This would dictate that the revetment/seawall system needs to be at least to +25 feet MSL in height to provide full protection to Beach Blvd. and the site." (p.11)

"Regarding Coastal Act Policy 26(a), "In this case, the proposed seawall height extension would minimize risks to life and property that is located in a flood zone by protecting the existing road (Beach Blvd.) and the proposed below-grade garage from wave overtopping." (p.12)

Excerpts from Documents Prepared by David Skelly (GeoSoils, Inc.) as Consultant to the City of Pacifica for the Beach Blvd Seawall/Revetment and as Consultant to the Applicant

01/14/02¹ (Client: City of Pacifica)

"Based upon this analysis [the ACES design and analysis system] the height of the revetment for a no overtopping condition should be a minimum of +21 ft MSL. Based upon our experience and direct observation the Beach Blvd revetment and wall system is severely overtopped at elevations of about +21'. The wave driven water coming over the top of the wall is observed to be between 2 to 3 feet in height. This would dictate that the revetment/seawall system needs to be up to about +25' MSL in height. The top of the RE wall varies from about +21' MSL to about +29' MSL. By direct observation the RE wall, even at +29' MSL, is overtopped." (p.8)

"There have been very few regional studies of the coastal processes in the Pacifica area." (p.3)

"The lack of any scientific, detailed coastal processes information in the Pacifica area makes it difficult to provide the Commission staff with specific and detailed information." (p.4)

"The revetment and RE wall are subject to significant overtopping." (p.11)

"[T]he reconstruction of the revetment as proposed should withstand storms comparable to the recent El Niño winters." (p.12)

01/16/02² (Client: City of Pacifica)

"The failure of the RE wall was a result of wave driven water passing through and over the revetment and reaching the soil behind the wall. The soil became saturated and lost its strength. The soil piped back out the wall and revetment resulting in the RE wall failure." (p.3)

"The shore protection, in particular the quarry stone revetment, is in immediate need of repairs. Without repairs Beach Boulevard and the homes along the boulevard will be subject to increased wave runup attack. In addition, the RE wall may be subject to catastrophic failure resulting in the loss of Beach Boulevard and the utilities beneath the road. The revetment needs to be reconstructed back to the design profile. This will require the addition of a minimum of 8000 tons of minimum 7 ton, maximum 10 ton size armor stone. ..." (p.4)

"The problems with the shore protection are a result of many factors which may include:

- High wave energy
- Undersized stones
- Filter fabric failure
- Adverse geology, high settlement and lack of bedrock
- Excessive overtopping" (p.4)

ATTACHMENT 2
Excerpts from Engineering Documents

Item #F 6a
A-2-PAC-07-022
Appellant Merchant

05/05/04³ (Client: Legacy Quest Condominiums)

"It is important to point out that the [US Army Corps of Engineers draft report in 1972] was produced in 1972 prior to the El Niño winters of the last two decades." and "it is important to point out that the Corps study does not include the last few decades of El Niño storms." (p.3)

"This section of coastline is subject to seasonal high waves. High waves in combination with high water levels result in erosion of the beach and wave attack on the RE wall and Beach Boulevard." (p.4)

"This would dictate that the revetment/seawall system needs to be at least to +25 feet MSL in height to provide full protection to Beach Boulevard and the site. (p.7)

"In an effort to reduce the amount of wave overtopping and resulting flooding of Beach Boulevard, the City of Pacifica has placed concrete traffic barriers (K-rails) along the top of the RE wall to act as flood shields. These shields are only partially effective and wave runup waters can still reach the site." (p.7-8)

"The placement of a minimum 30-inch high block wall (or equivalent) along Beach Boulevard fronting thee development will provide significant protection from wave runup." (p.8)

"The site will be subject to wave runup and flooding, possibly several times in a given year." (p.9)

03/02/07⁴ (Client: Pacific Beach Condominiums)

"... the type of event that can lead to wave runup to elevation +27 MSL is relatively rare (approximately once per year) and will only occur over a short period of time (approximately over an hour)." (p.4)

"There are no additional recommendations necessary for wave overtopping protection and it is very unlikely that any additional shore protection will be needed to protect the site in the next 75 years." (p.6)

03/22/07⁵ (Client: Pacific Beach Condominiums)

"To facilitate safe access and egress into the proposed garage, Beach Boulevard needs to be raised about 2 feet near the northwest corner of the development site." (p.1)

"The crest elevation (highest) of the raised street is about +27 feet MSL. This is at the very upper limit of wave runup." (p.1)

09/19/07⁶ (Client: City of Pacifica)

"The monitoring of the quarry stone as a condition of CDP 2-01-026 was not performed." (p.1)

"However, there is suspicion that the structure was not built to the design depth due to constructability issues." (p.2)

10/22/07⁷ (Client: Pacific Beach Condominiums)

"The increase in the water level may likely increase the frequency of overtopping, although overtopping will remain a rare event." (p.6)

"A sea level rise of 2.5 feet over the next century, based upon the rise relative to the tidal range and the site elevation, should not significantly impact the proposed development over the next 100 years." (p.6)

"It is GSI's suspicion that the Beach Blvd. revetment, when first built, did not conform to the approved design, and therefore maintenance and repair were subsequently required. (p.6)

ATTACHMENT 2
Excerpts from Engineering Documents

Item #F 6a
A-2-PAC-07-022
Appellant Merchant

"The maintenance in 2002 was approved for the addition of 10,000 tons. This brings the total permitted stone volume to 60,000 tons. ... However, only about 6,000 tons were imported in 2002 due to financial constraints." (p.6)

"The RE wall has also required maintenance in the form of filling voids behind the wall and repairing a section that was damaged by waves reflecting off of the pier terminus. The fortification work performed, and underway, to bring the structure to the initial design profile, will result in a structure that requires less frequent repair and maintenance than required over the recent years." (p.7)

"All coastal structures require maintenance to ensure their proper performance. ... At this time, Beach Boulevard shore protection needs maintenance of the revetment and filling void areas beneath the boardwalk (no voids are near the site)." (p.7)

"With continued maintenance of both the revetment and the RE wall the shore protection may last indefinitely. Maintained seawalls have lasted over 100 years, as have coastal structures composed of quarry stone." (p.7)

"Wave runup and overtopping will not significantly impact this site over the life (100 years) of the proposed improvements." (p.8)

11/07/07⁸ (Client: City of Pacifica)

"The shore protection fronting Beach Boulevard was inspected by the undersigned in November 2002 (after maintenance), April 2007, and September 5, 2007. The northern ~500 feet of the revetment was observed in March 2006. This report also provides recommendations for repairs that are necessary as a result of significant wave activity between the period of December 2005 and January 2006." (p.1)

"The piping out of soils behind the RE wall has resulted in voids beneath the Promenade behind the RE wall and jeopardizes the integrity of the RE wall. (p.1)

"During the 2006 and 2007 site inspections several sections of the revetment were flatter and lower than the design profile. This is due to a combination of settlement and dislodgement of the armor stone. The settlement and dislodgement were a direct result of the extreme wave activity. In addition, some of the armor stone may have fractured under the extraordinary waves, breaking down, and repacking to a lower profile." (p.2)

"With continued repair and maintenance of both the revetment and the RE wall the shore protection may last a long time." (p.4)

01/02/08⁹ (Client: Pacific Beach Condominiums)

"very rare occasion when waves runup across Beach Blvd. and reach the site."

01/08/08¹⁰ (Client: Pacific Beach Condominiums)

"There are no additional recommendations necessary for wave overtopping protection and it is very unlikely that any additional shore protection will be needed to protect the site in the next 75 years."

REFERENCES

¹ "Response to California Coastal Commission CDP 2-01-026, City of Pacifica," Letter from Skelly Engineering to Scott Holmes, Director of Public Works, City of Pacifica, January 14, 2002.

² "Beach Boulevard, Pacifica, Shore Protection Inspection," Letter from Skelly Engineering to Scott Holmes, Director of Public Works, City of Pacifica, January 16, 2002.

³ "Coastal Hazard Study Proposed Legacy Quest Condominiums, 1567 Beach Boulevard, Pacifica," Letter from GeoSoils Inc. to Joel Baldwin, Earth Investigation Consultants, May 5, 2004.

ATTACHMENT 2
Excerpts from Engineering Documents

Item #F 6a
A-2-PAC-07-022
Appellant Merchant

- ⁴ "Additional Discussion of Coastal Hazards and Potential Impacts, Pacific Beach Condominiums, 1567 Beach Boulevard, Pacifica, California," Letter from GeoSoils (David Skelly) to Lee Diaz, Assistant Planner, City of Pacifica, March 2, 2007.
- ⁵ "Additional Discussion of Raising Beach Boulevard, Wave Runup Reflection, and Garage Flooding, Pacific Beach Condominiums, 1567 Beach Boulevard, Pacifica, California," Letter from GeoSoils (David Skelly) to Lee Diaz, Assistant Planner, City of Pacifica, March 22, 2007.
- ⁶ "Beach Boulevard, Pacifica, Response to Coastal Commission Information Request for CDP 2-07-028; Letter from GeoSoils Inc. to Director of Public Works, City of Pacifica, September 19, 2007.
- ⁷ "Discussion of Sea Level Rise Impacts on Pacific Beach Condominiums, 1567 Beach Boulevard, Pacifica, California," Letter from GeoSoils (David Skelly) to Ms. Nadia Holober, October 22, 2007.
- ⁸ "Beach Boulevard Shore Protection Observation & Repair Recommendations, Pacifica, San Mateo County. REF: PW 3438-0 (FEMA-1628-DR-CA);" Letter from GeoSoils Inc. to Director of Public Works, City of Pacifica, November 7, 2007.
- ⁹ "Coastal Hazards for Proposed Pacific Beach Condominiums and "At Grade" Parking Project Alternative, 1567 Beach Boulevard, Pacifica;" Letter from GeoSoils Inc. to Nadia Holober, January 2, 2008.
- ¹⁰ "Response to California Coastal Commission Letter dated December 28, 2008 [2007];" Letter from GeoSoils Inc. to Nadia Holober, January 8, 2008.

Michael Endicott

From: todd bray [jazb@sbcglobal.net]
Sent: Tuesday, February 26, 2008 10:21 AM
To: Michael Endicott
Cc: lionel; Peter Loeb; loislane@hax.com; mayburrito@goofbuster.com
Subject: F 6a, A2 PAC 07 022 Staff recommends approval of Beach Blvd Condo's

Dear Michael,
A2-PAC-07-022

F 6a

Thank you for the opportunity to comment on this item. I hope this email is sufficient to comment on agenda item F 6a, CDP A2 PAC 07 022. If I am required to send a letter via the US Postal Service please advise to that requirement.

I was the lone NO vote on this project when it came before the Pacifica Planning Commission. My reasons were the safety of the occupants and the over all massiveness of the design. I still feel the project puts potential occupants at unnecessary risk and that it is out of character with the surrounding neighborhood.

I feel this project is too large and will risk the occupants health and safety. One of the conditions of approval is to indemnify the CCC from any harm done to the property or occupants. To me that says the CCC staff feels the same. I question staffs recommendation to approve the CDP for this project. Staffs recommendation seems to contradict staffs beliefs about the long term safety and survivability of this project.

Another condition of approval is that no rebuilding can happen if and when the Pacific Ocean tops the sea wall and causes damage to the buildings. To me that says the CCC Staff acknowledge the condo project is likely to be overcome at some point during the life of the project. Again Staffs recommendation to approve the CDP seems to contradict what staff believes is the long term survivability of the project.

Another condition of approve requires a deed restriction that no sea wall improvements can be permitted in the future, ever. This to me condemns the project to be over run by the ocean sooner rather than later. It is another contradiction where staff is recommending approval but acknowledging the dangers to occupants of the project.

I respectfully ask the members of the California Coastal Commission to vote AGAINST staffs recommendation to approve agenda item F 6a, A2 PAC 07 022 and DENY the CDP for he Beach Blvd condos. The conditions of approval clearly shows a contradiction in staffs beliefs of the survivability and safety of this project.

Thank you for your attention to this matter.

Yours

Todd McCune Bray

468 Donaldson
Pacifica CA 94044
(650) 355 6788

February 20, 2008

Mr. Michael Endicott
California Coastal Commission
Northern Central Coast District Office
45 Fremont Street, Suite 2000
San Francisco, CA 94105-2219

Dear Mr. Endicott,

Thank you for meeting with Nancy Merchant and myself on the 1st, your time was appreciated. I write to express my concern with the newly proposed project; it was unsafe before, and it is even less safe now.

As you know, the additional retaining wall originally proposed was asked for by Pacifica and recommended by GeoSoils, Inc. during public hearings, and during peer review (Cotton, Shires & Associates; Supplemental Geotechnical Peer Review; 2/9/2007). This document states in part: "*To achieve wave protection to elevation 27 feet MSL, we recommend that a second wall be considered that is laterally separated from the existing wall so as to avoid surcharge loading the existing sea wall.*" This was necessary to mitigate against wave over-topping, it is what the City approved and it was also required in the MND. To eliminate it poses an unnecessary risk for the future residents and their property.

Section 30253 of the Coastal Act states in part:

New development shall:

- (1) Minimize risks to life and property in areas of high geologic, flood, and fire hazard.

It will **maximize** risk to life and property by placing the driveway on the very edge of the sea. The applicant has vastly underestimated the duration, frequency and severity of wave run-up and overtopping.

All of the estimates are based on an inaccurate model. There are no accurate models for predicting wave forces in Pacifica. Skelly Engineering, "Response to California Coastal Commission CDP 2-01-026, City of Pacifica", January 14, 2002, Page 4, states in relevant part: *The lack of any scientific, detailed coastal processes information in the Pacifica area makes it difficult to provide the Commission staff with specific and detailed information.*

That same document gives a detailed analysis of wave run-up (Pages 6 – 8). It summarizes: “Based on this analysis the height of the revetment for a no overtopping condition should be a minimum of +21 ft MSL. Based on our experience and direct observation the Beach Blvd. revetment and wall system is severely overtopped at elevations of about +21’. The wave driven water coming over the top of the wall is observed to be about 2 to 3 feet in height. This would dictate that the reverment/seawall system needs to be up to about +25’ MSL in height. The top of the RE wall varies from about +21’ MSL to about 29’ MSL. By direct observation the RE wall, even at +29’ MSL, is overtopped”. While Mr. Skelly clearly acknowledges the model is inaccurate, it is this very model he is using for this project. Specifically, the claims:

That overtopping is rare, and only occurs for about an hour each day.
That very little water is actually projected forward during overtopping.
That +27 feet MSL is sufficient to protect against overtopping.

Overtopping is quite common, and can occur for 3 or more hours twice a day.

Overtopping is very common in winter; I directly experienced this about half of the days in January during the storms, and Beach Blvd. was closed for 3 days. In fact, even on a clear, calm day with no swells, there is significant overtopping. On Saturday, February 9, 2008, I observed overtopping above +35 feet MSL over a period of 3 hours, from 10:15 a.m. to 1:15 p.m. See Attachment A.

Huge amounts of water can be projected during overtopping.

On Saturday, February 16, 2008, I counted overtopping events from 6:12 a.m. to 6:42 a.m. There was a large western swell that day. During this time, significant overtopping (leaving water 40 feet back from the seawall) occurred over 30 times, or more than once per minute. Three times during that half hour, there was massive overtopping; enough water came forward to clear a 4 foot tall fence sixty feet east of the seawall – these are my front patios. In the ten years I have been here, more than once I have directly observed a foot of water dumped there by a single wave, 60 feet east of the seawall.

+27 feet MSL near the seawall is a dangerous place to be.

The previous observations were made on calm days; it is much worse in a storm. In addition to the ocean, there is water borne debris – rocks, driftwood, etc. Even in the last January storms, which weren’t a ten year event, stainless steel and chain link fences were bent, wooden structures washed or blown away, entire houses were overtopped and had to be boarded up. Large (about 5 ton) boulders were dislodged – and they rested just where the driveway is proposed. See Attachment B. In addition to the exposure while on the driveway ramp, vehicles will be directly on the edge of the seawall at only +22 MSL. Wave forces here are even more extreme; in 1997 they “bent the rail and snapped off the metal posts”. See Attachment C.

I have not seen any studies that show the vulnerability of the driveways northern edge. This will project north of the headwall, and only be protected by rock revetment. The revetment is frequently damaged during large storms, and this will undermine the stability and integrity of the driveway, presenting further hazards.

There is also the issue of maintenance equipment access. The driveway location is the only access point available for the repair of the revetment, which is a continuous process. It is also where maintenance equipment is stored while repairs are underway. The equipment cannot be stored on the beach, nor can it be stored on Beach Blvd, as it would place too great a load on the seawall (per Van Ocampo, Director of Engineering, City of Pacifica). Provisions must be made for the continued repair of the revetment.

In summary, this proposed project does not meet the requirements of Section 30253 of the Coastal Act. It does not take into account 10 year events, let alone being designed for a 100 year lifespan. Any design that incorporates sandbags as a mitigation measure (GeoSoils, Inc, "Response to California Coastal Commission Letter dated December 28, 2008 (sic)", January 8, 2008) is obviously flawed. Alternatives must be sought for the development of this property that will be consistent with the Coastal Act.

Respectfully,

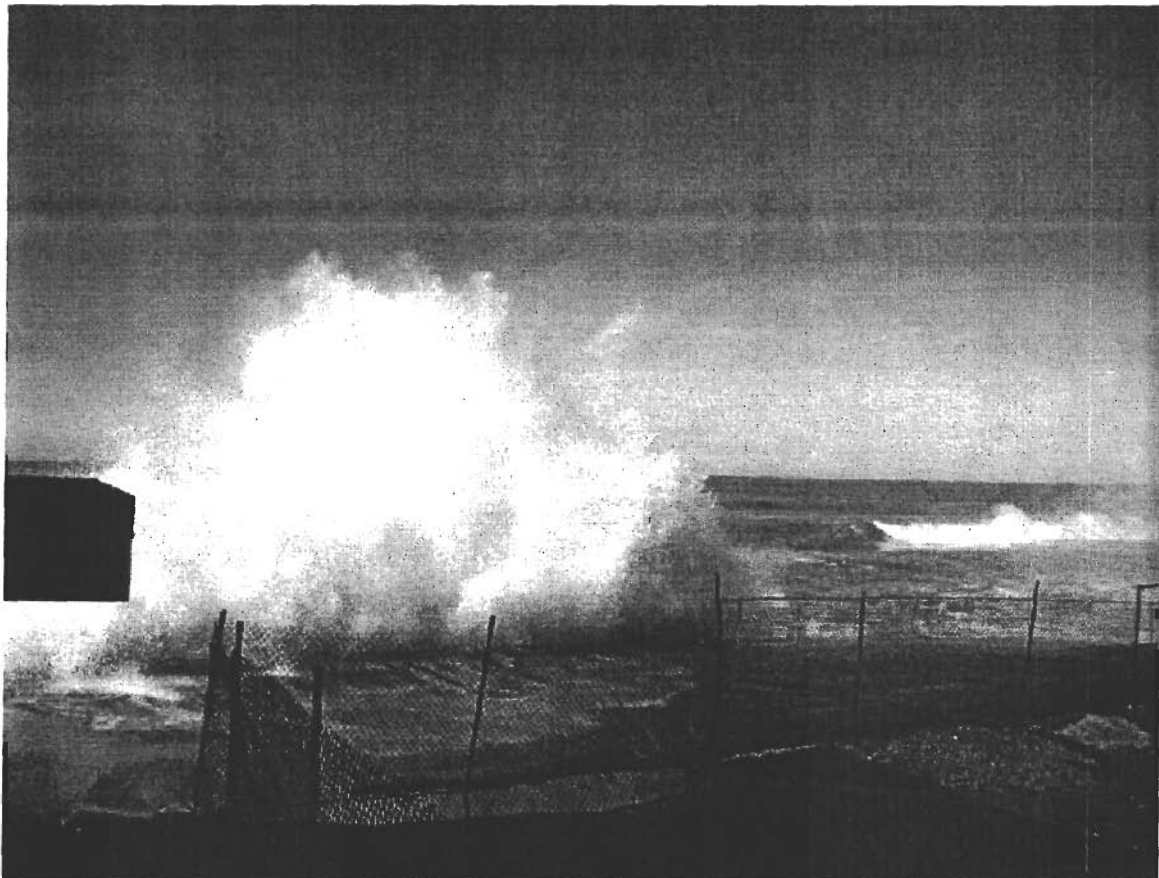
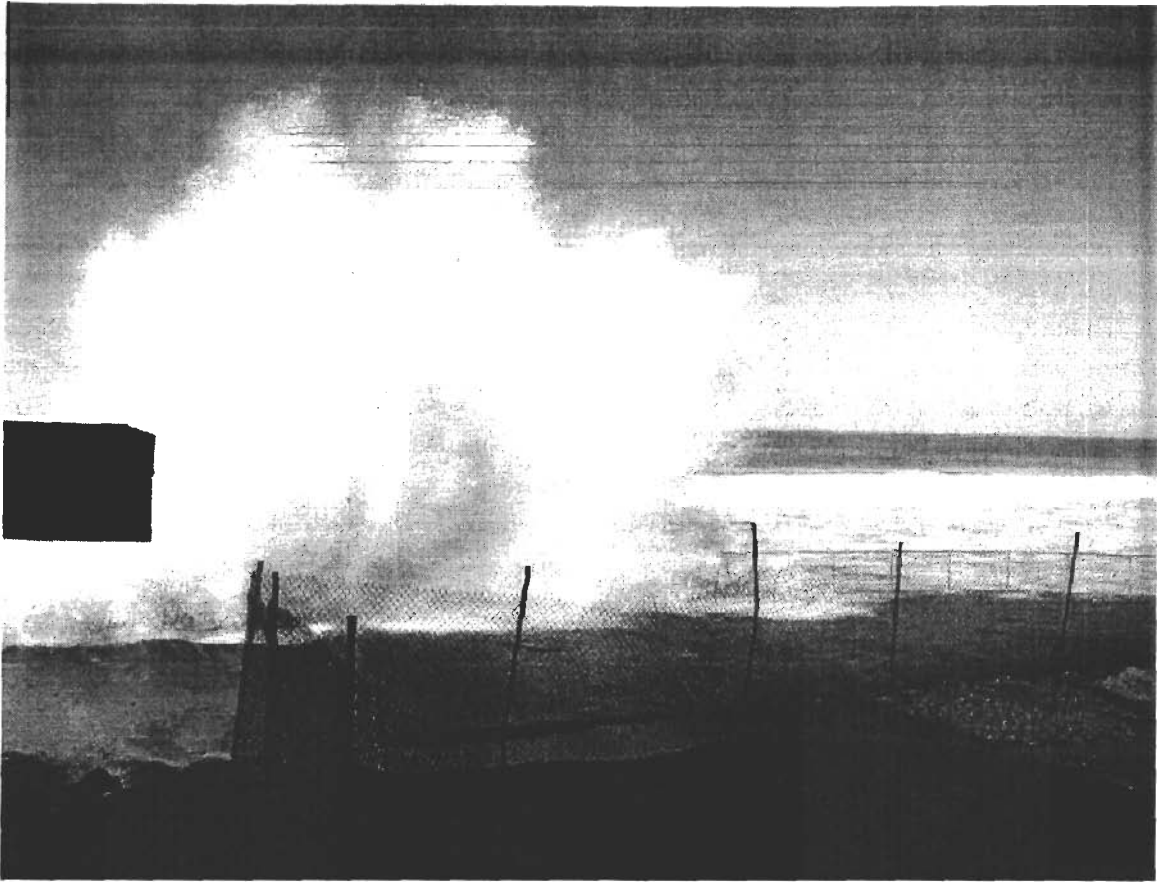
Patrick Rentsch
1581 Beach Blvd.
Pacifica, CA 94044

Attachment A

All of these pictures were taken on February 9, 2008 from 10:15 a.m. to 1:15 p.m. They are directly in front of 1567 Beach Blvd. It is a calm, sunny day; note there are no swells or whitecaps on the water. The black bar on the left hand side is a ledge shielding the downstairs apartment; it is approximately + 35 feet MSL. The top of the stainless rail on the edge of the seawall is approximately + 25 feet MSL.















Attachment B

During severe wave overtopping, Beach Blvd. is closed for safety, and street is ten to twenty feet east of the seawall. This happens every year; this year it was closed from Jan 4 – 6. The debris is asphalt scoured from the sidewalk.



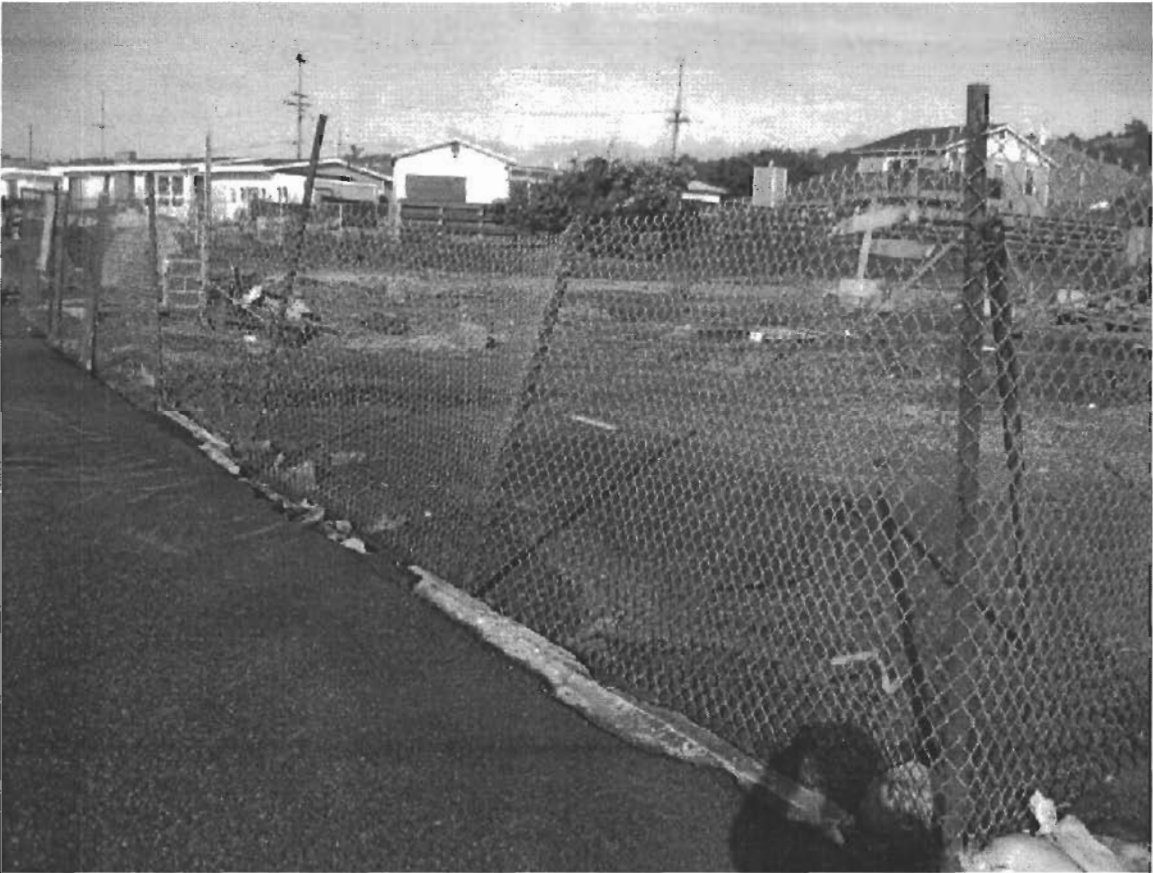
This is water born driftwood, lodged between the fence and staircase, about 1 foot off the ground – the water obviously had to be at least one foot deep for this to occur. This is approximately 70 feet east of the seawall. Note the other piece of driftwood to the left – **inside of the fenced off area**. This picture was taken on January 13, 2008. As of today, February 20, 2008, that driftwood has been pushed back another 20 feet.



During heavy storms, the overtopping will push sand, stones, and asphalt over 100 feet back from the sea wall.



The storm this year was powerful enough to bend this chain link fence back. This is 40 feet east of the seawall, directly on the west property boundary of 1567 Beach Blvd.



The residents and neighbors of 244 Shoreview put out plastic to prevent further erosion. 236 Shoreview (blue house with boarded up windows) was completely overtopped by a wave.



These large (approximately 5 ton) boulders were dislodged. They are exactly where the driveway is proposed.



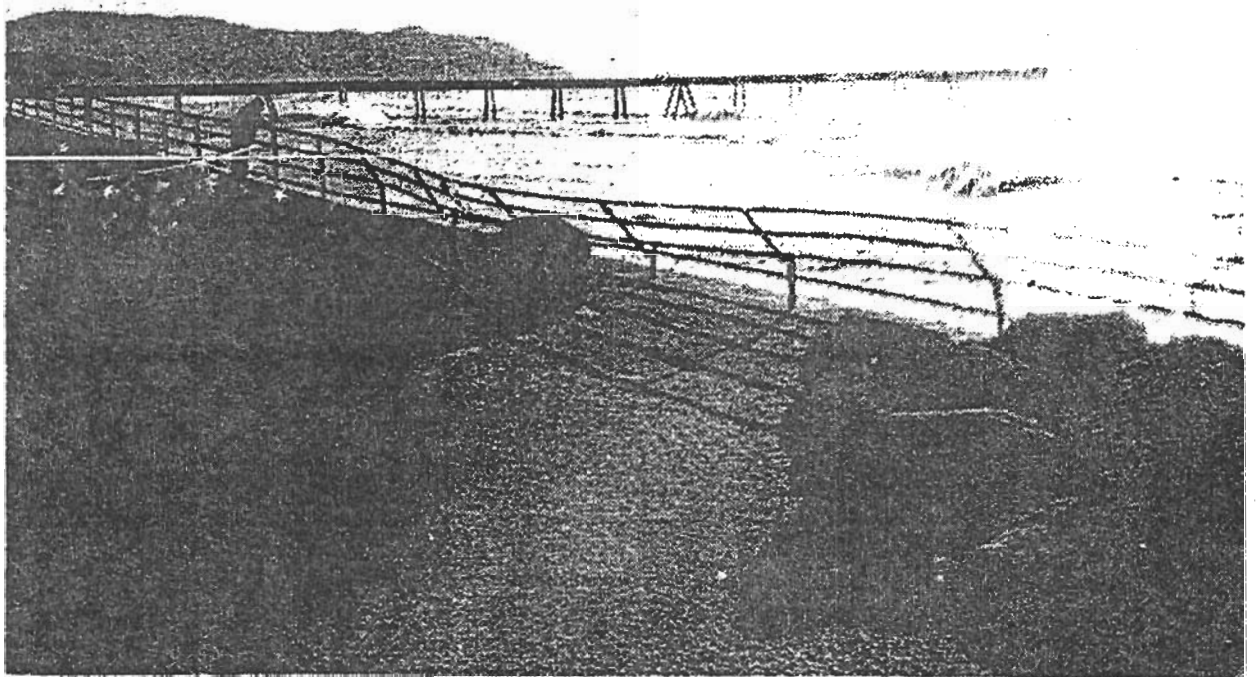
An excavator for revetment repair. It is parked just where the driveway is proposed; note the rear end of the tracks in free air. There would be no room if the driveway is constructed here.



Attachment C

Pacific Tribune, December 17, 1997 — Page 1

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Tribune Photo — Chris Hunter

Surf Power

The pounding waves along the Beach Boulevard Promenade mangled the metal guard rail at the foot of Paloma, bending the rail and snapping off the metal posts. City officials are developing a permanent solution to the problem, perhaps a concrete wall instead of a metal rail.

Photo by James Franco

