

CALIFORNIA COASTAL COMMISSION

NORTH CENTRAL COAST DISTRICT OFFICE
45 FREMONT, SUITE 2000
SAN FRANCISCO, CA 94105-2219
(415) 904-5260 FAX (415) 904-5400

F7

NORTH CENTRAL COAST DISTRICT DEPUTY DIRECTOR'S REPORT

*For the
October Meeting of the California Coastal Commission*

MEMORANDUM

Date: October 7, 2011

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 October 7, 2011 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. 2-11-033-W The Olympic Club (San Francisco, San Francisco 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>
2-11-033-W The Olympic Club	Removal of the existing 123.5 square-ft., 12-ft. tall driving range golf ball dispensing building and construction of a new 236.25 square-ft. (13.5-ft x 17.5-ft), 15-ft. tall ADA/wheelchair accessible structure. The new building will replace the existing structure and serve for the dispensing of golf balls (the same purpose as the existing building to be demolished). Project includes the installation of new structural grade beams with columns, electrical lines, and data lines. All work will be conducted as shown on plans prepared by Kotas/Pantaleoni Architects, dated 8/9/11, on file in the North Central Coast District Office.	599 Skyline Blvd., San Francisco (San Francisco County)

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www.coastal.ca.gov

**NOTICE OF COASTAL DEVELOPMENT PERMIT WAIVER**

DATE: September 28, 2011
TO: The Olympic Club
FROM: Charles Lester, Executive Director
SUBJECT: Waiver of Coastal Development Permit Requirement:
Waiver De Minimis Number 2-11-033-W

Based on project plans and information submitted by the applicant(s) named below regarding the development described below, the Executive Director of the Coastal Commission hereby waives the requirement for a Coastal Development Permit, pursuant to Title 14, Section 13238 of the California Code of Regulations.

APPLICANT: **The Olympic Club**

LOCATION: **599 Skyline Blvd., San Francisco (San Francisco County) (APN(s) 000-7284-01, 000-000-02)**

DESCRIPTION: **Removal of the existing 123.5 square-ft., 12-ft. tall driving range golf ball dispensing building and construction of a new 236.25 square-ft. (13.5-ft x 17.5-ft), 15-ft. tall ADA/wheelchair accessible structure. The new building will replace the existing structure and serve for the dispensing of golf balls (the same purpose as the existing building to be demolished). Project includes the installation of new structural grade beams with columns, electrical lines, and data lines. All work will be conducted as shown on plans prepared by Kotas/Pantaleoni Architects, dated 8/9/11, on file in the North Central Coast District Office.**

RATIONALE: **Proposed development involves no significant impacts on coastal resources or public access to the shoreline.**

IMPORTANT: This waiver is not valid unless the site has been posted AND until the waiver has been reported to the Coastal Commission. This waiver is proposed to be reported to the Commission at the meeting of Friday, October 7, 2011, in Huntington Beach. If four Commissioners object to this waiver, a coastal development permit will be required.

Persons wishing to object to or having questions regarding the issuance of a coastal permit waiver for this project should contact the Commission office at the above address or phone number prior to the Commission meeting date.

Sincerely,
CHARLES LESTER
Executive Director

By: RENEE T. ANANDA
Coastal Program Analyst

cc: Local Planning Dept.

Kotas/Pantaleoni Architects, Attn: Anthony A. Pantaleoni

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**Memorandum****October 5, 2011**

To: Commissioners and Interested Parties

FROM: Charles Lester, Deputy Director
 North Central Coast District

Re: *Additional Information for Commission Meeting
 Friday, October 7, 2011*

<u>Agenda Item</u>	<u>Applicant</u>	<u>Description</u>	<u>Page</u>
F9a	2-08-020 AIMCO, Esplanade Avenue Apartments LLC, Pacifica	Staff Report Addendum	
F9a	2-08-020 AIMCO, Esplanade Avenue Apartments LLC, Pacifica	Addendum: Additional information associated with application	
F9a	2-08-020 AIMCO, Esplanade Avenue Apartments LLC, Pacifica	Correspondence, Bart Willoughby	1-37
		Correspondence, Ann Rankin	38-39
		Correspondence, Richard W. Lund	40
		Correspondence, Robert W. Anderson	41-47

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F9a



Prepared October 5, 2011 (for October 7, 2011 hearing)

To: Coastal Commissioners and Interested Persons

From: Charles Lester, Deputy Director
Ruby Pap, District Supervisor
Nicholas Dreher, Coastal Planner

**Subject: STAFF REPORT ADDENDUM for Item F9a
Coastal Development Permit no. 2-08-020 (AIMCO, Esplanade Avenue
Apartments LLC, Pacifica)**

The purpose of this staff report addendum is to: 1) amend Special Condition 5 to provide an enforceable mechanism of reducing the scope of the proposed project in the event adjacent property owners do not give the applicant permission to perform certain rock removal activities in Areas 1 and 2 of the project description; 2) insert Special Condition 16 and supporting findings, to limit the Commission's liability in the event a non-applicant seeks legal action; and 3) address other minor non-substantive changes. Deletions are shown in ~~striketrough~~ and additions are shown in underline.

Staff continues to recommend approval of this project as conditioned. In the event the adjacent property owner does not give permission for the rock removal activities identified above, the approved project, as conditioned, can still be found consistent with the Coastal Act.

1. Amend Project Description on page 1 as follows:

After-the-Fact permanent authorization for temporary work performed under six emergency permits, including construction of (1) a rock riprap revetment along the toe of the bluff totaling approximately 475 feet long, (2) three soil nail wall segments totaling approximately ~~5,006~~7,722-square-feet, and (3) an engineered, vegetated reconstructed slope. The applicant also proposes a 14,171 sq. ft. public access dedication on 360 Esplanade Avenue and a \$289,014.96 payment to mitigate the impacts of the development permanently authorized after the fact.

2. Amend Special Condition #3 as follows:

- b. Any future redevelopment of the blufftop residential parcels shall not rely on the permitted shoreline protective devices to establish geologic stability or protection from hazards. Redevelopment on the sites shall be sited and designed to be safe without reliance on shoreline or bluff protective devices. As used in this condition, "redevelopment" is defined to include: (1) additions; (2) expansions; (3) demolition, renovation or replacement that would result in alteration to 50 percent or more of an existing structure, including but not limited to, alteration of 50 percent or more of interior

walls, exterior walls or a combination of both types of walls; or (4) demolition, renovation or replacement of less than 50 percent of an existing structure where the proposed remodel or addition would result in a combined alteration of 50 percent or more of the structure (including previous alterations) from its condition in October 2011; ~~and~~

[...]

3. Amend Special Condition #4 as follows:

No later than 19 years prior to the termination of the twenty year authorization period for the permitted shoreline protective devices pursuant to Special Condition 2, the property owners shall submit to the Commission an application for a coastal development permit amendment to either remove the subject shoreline protection in its entirety, change or reduce its size or configuration, or extend the length of time the subject shoreline protection is authorized. Provided a complete application is received before the termination of the 20-year authorization period, the authorization period shall be automatically extended until the time the Commission acts on the application. Sufficiently detailed information shall accompany any amendment application to allow the Commission to consider the following in review of the proposed permit amendment:

[...]

4. Amend Special Condition #6 as follows:

WITHIN 60 DAYS OF COASTAL COMMISSION ACTION ON THIS CDP APPLICATION, or within such additional time as the Executive Director may grant for good cause, and in order to implement the applicant's proposal of an offer to dedicate an easement for lateral public access and passive recreational use along the shoreline as part of this project, the landowners shall execute and record a document, in a form and content acceptable to the Executive Director, irrevocably offering to dedicate to a public agency or private association approved by the Executive Director an easement for lateral public access and passive recreational use along the shoreline. The document shall provide that the offer of dedication shall not be used or construed to allow anyone, prior to acceptance of the offer, to interfere with any rights of public access acquired through use which may exist on the property. Such easement shall be located along the entire width of the property at 360 Esplanade Avenue (APN 009-413-060) from the ambulatory mean high tide line landward to the toe of the proposed revetment. (Identified as the hatched area on page 1 of **Exhibit 4**).

The document shall be recorded free of prior liens which the Executive Director determines may affect the interest being conveyed, and free of any other encumbrances which may affect said interest. The offer shall run with the land in favor of the People of the State of California, binding all successors and assignees, and shall be irrevocable. The recording ~~ing~~ document shall include a formal legal description and graphic depiction, prepared by a licensed surveyor, of both the applicants' entire parcel and the easement area. These ~~deed~~

~~restriction~~recorded document shall not be removed or changed without a Coastal Commission-approved amendment to this coastal development permit, unless the Executive Director determines that no amendment is required.

5. Amend Special Condition 11 as follows:

PRIOR TO COMMENCEMENT OF CONSTRUCTION, the applicants shall provide to the Executive Director copies of all other required state and federal discretionary permits for the development authorized by CDP 2-08-020. The applicant shall inform the Executive Director of any changes to the project required by other state or federal agencies. Such changes shall not be incorporated into the project until the applicants obtain a Commission amendment to this permit, unless the Executive Director determines that no amendment is legally required.

~~**WITHIN 60 DAYS OF COASTAL COMMISSION ACTION ON THIS CDP APPLICATION**~~, or within such additional time as the Executive Director may grant for good cause, ~~the permittee shall provide written evidence of the full consent of any underlying land owner of the proposed project, to the extent the construction activities approved herein involve removal or alteration of rock on property not owned by the permittee.~~Prior to the commencement of any development involving property not owned by the permittee, the permittee shall provide, for the review and approval of the Executive Director, evidence that the adjacent property owner has provided permission to the permittee to perform construction activities on the adjacent property as conditioned by this permit. To the extent that permission is not obtained, the development authorized herein to take place on the adjacent property will not be undertaken. Such development involves the removal of rock on the adjacent property.

6. Insert Special Condition 16 at the top of page 16 as follows:

16. Liability for Costs and Attorneys Fees

The Permittee shall reimburse the Coastal Commission in full for all Coastal Commission costs and attorneys fees -- including (1) those charged by the Office of the Attorney General, and (2) any court costs and attorneys fees that the Coastal Commission may be required by a court to pay -- that the Coastal Commission incurs in connection with the defense of any action brought by a party other than the applicant against the Coastal Commission, its officers, employees, agents, successors and assigns challenging the approval or issuance of this permit. The Coastal Commission retains complete authority to conduct and direct the defense of any such action against the Coastal Commission.

7. Insert the following after the second full paragraph on page 44:

Coastal Act section 30620(c)(1) authorizes the Commission to require applicants to reimburse the Commission for expenses incurred in processing CDP applications. See also 14 C.C.R. § 13055(e). Thus, the Commission is authorized to require reimbursement for

expenses incurred in defending its action on the pending CDP application. Therefore, consistent with Section 30620(c), the Commission imposes Special Condition 16, requiring reimbursement of any costs and attorneys fees the Commission incurs “in connection with the defense of any action brought by a party other than the Applicant/Permittee ... challenging the approval or issuance of this permit.”

AIMCO

**360 & 380 Esplanade Avenue,
Pacifica, San Mateo County**

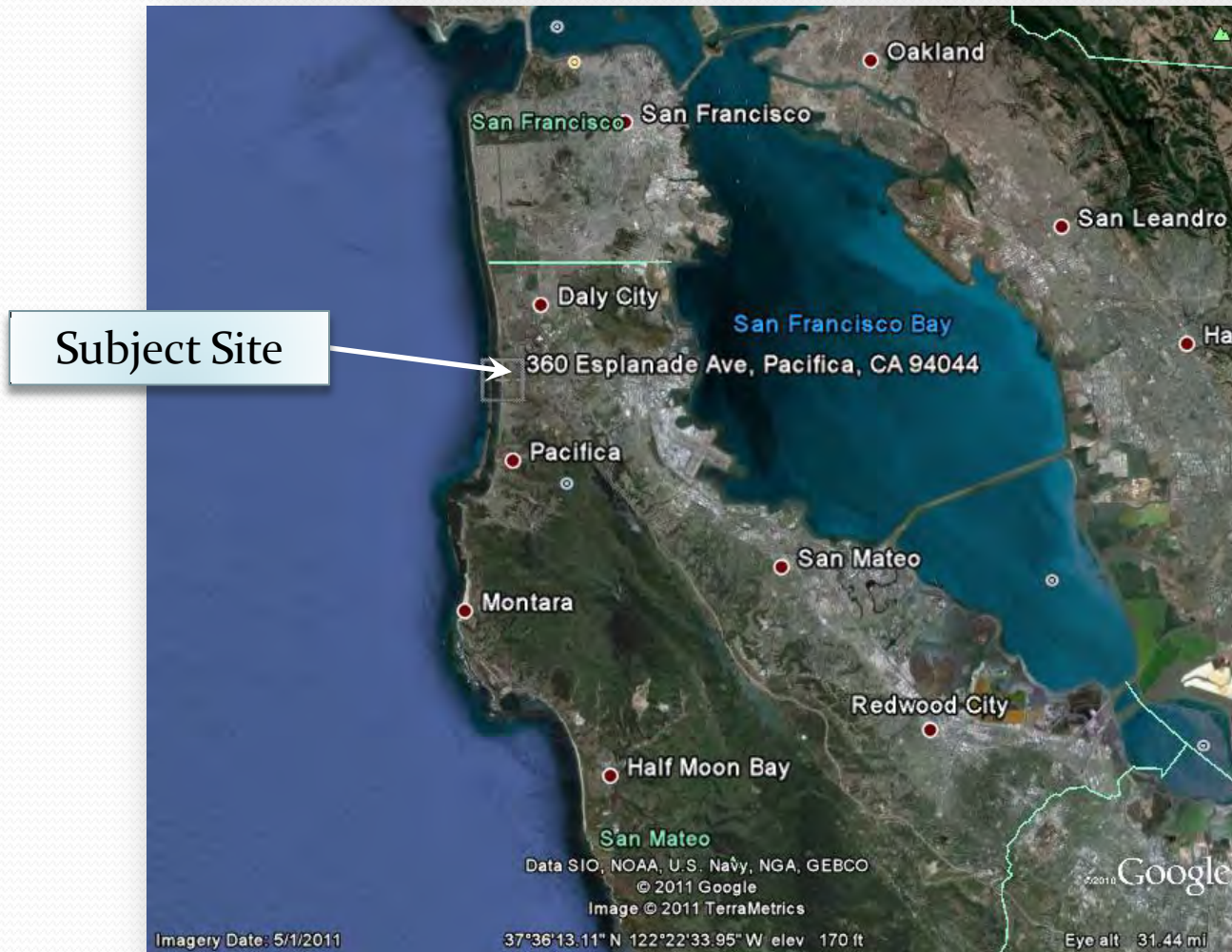
Item F9a

October 7, 2011

CCC Hearing

A copy of this briefing booklet has been provided to Coastal Commission Staff.

Location



Project Site

360 Esplanade



380 Esplanade



37°39'06.29" N 122°29'34.73" W elev 87 ft

720316
Google
Eye alt 1480 ft

Site History

1998-1999

- Emergency Permits issued to previous owners to place rock revetment along base of bluff.
- Rock revetments installed in conjunction with City effort at 380 Esplanade to protect storm drain structure.
- Rock revetments installed on City property in front of 380 Esplanade extending from City storm drain structure north into 360 Esplanade property.

2002/2003 Winter Months

- Erosion of bluff & undermined drainage swale from 310-360 Esplanade.

September 2006

- Aimco purchases property.

2007/2008 Winter Months

- Erosion of bluff (5-10 feet) & further undermined drainage swale from 310-360 Esplanade.

February 2008

- Erosion of 20-30 feet of bluff from 310-360 Esplanade.

June 2009

- Aimco applies for CDP for 1) rock revetment extension and 2) follow-up permit to permanently authorize work carried out under 1998-1999 Emergency Permits by previous owners.

December 2009

- Erosion of 30-40 feet of bluff at 360 and 20 more feet at 330 & 340 Esplanade.
- Aimco receives Emergency Permit for rock revetment and begins work immediately.

March/June 2010

- Continued upper bluff erosion threatening structure at 360 Esplanade.
- Aimco receives Emergency Permit for soil nail wall and begins work immediately.

2010-Present

- Aimco continues to work with staff to permanently authorize all work conducted on property by previous owner and Aimco.

September 2011

- Applicant and staff agree to revised project plan to remove portion of revetment/reduce structural footprint.

Proposed Project

- Follow-up authorization of work performed under emergency permits to protect existing structures, including:
 - Construction of approx. 475 ft.-long rock riprap shoreline revetment (245 linear feet placed by previous owners);
 - Removal of approx. 42% of rock previously placed under emergency permits (5,086 tons/12,211 tons); and
 - Construction of colored and textured soil-nail wall segments.

Regional Context



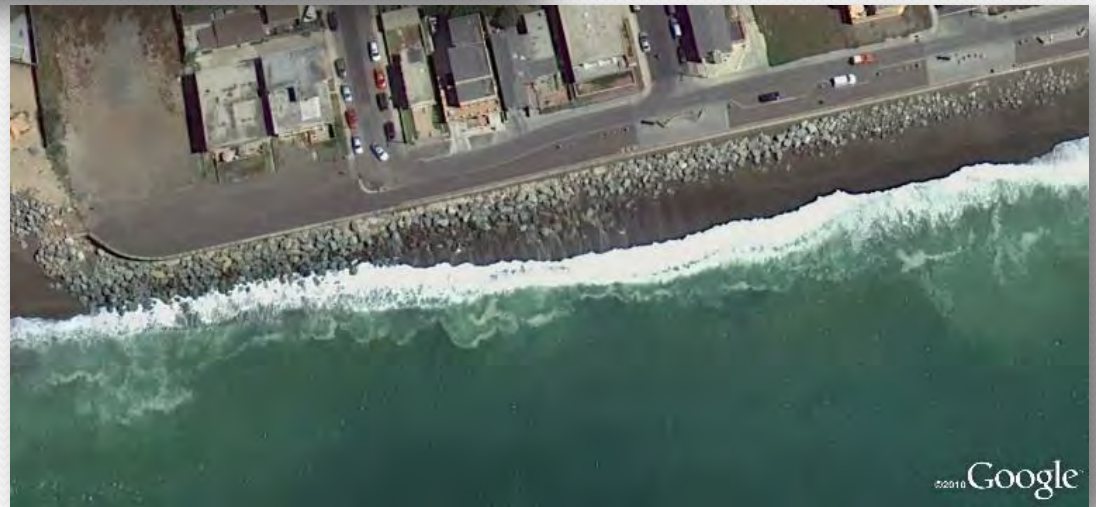
Rock revetments utilized throughout City of Pacifica and regional coastline to address severe erosion issues.



Regional Context



Regional Context



Project Revision

- Staff requested alternatives analysis to achieve reduction in structural footprint on beach to improve lateral access and aesthetics.
- Although rock revetment is effectively protecting property and is consistent with character of surrounding area, applicant agreed to conduct analysis with additional technical studies.
 - Vertical wall/no rock: Not appropriate for subject site due to high wave action and narrow beach. Toe protection required.
 - Rock reduction/soil nail wall: Allows minimal amount of rock on beach for toe protection, requires construction of soil nail wall segments as necessary. Achieves bluff protection with fewer impacts. Agreeable alternative to staff and applicant.

Existing Conditions

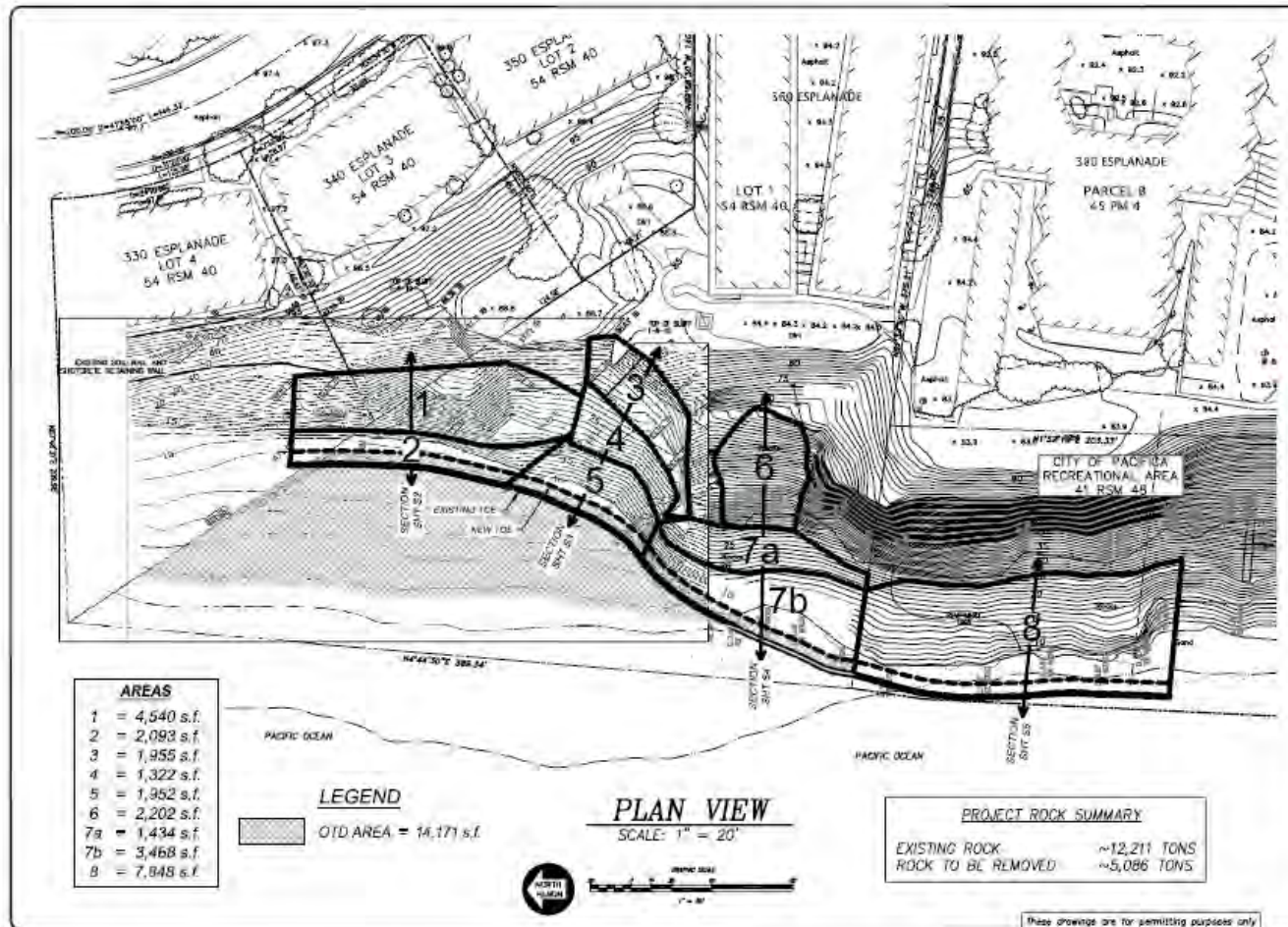


Revised Project Conditions



Photosimulation

Revised Project Plans



8/22/11

DESIGNED BY: [Signature]

DATE: 8/22/11

PROJECT NO: 110001-001

SCALE: 1" = 20'

DATE: 8/22/11

City of Pacifica

RECREATIONAL AREA

360 & 380 ESPLANADE AVE., PACIFICA, CA

3141 Hillman Way, San Bruno, CA 94066

708-528-9133

Revised Shore Protection

360 & 380 Esplanade Ave., Pacifica, CA

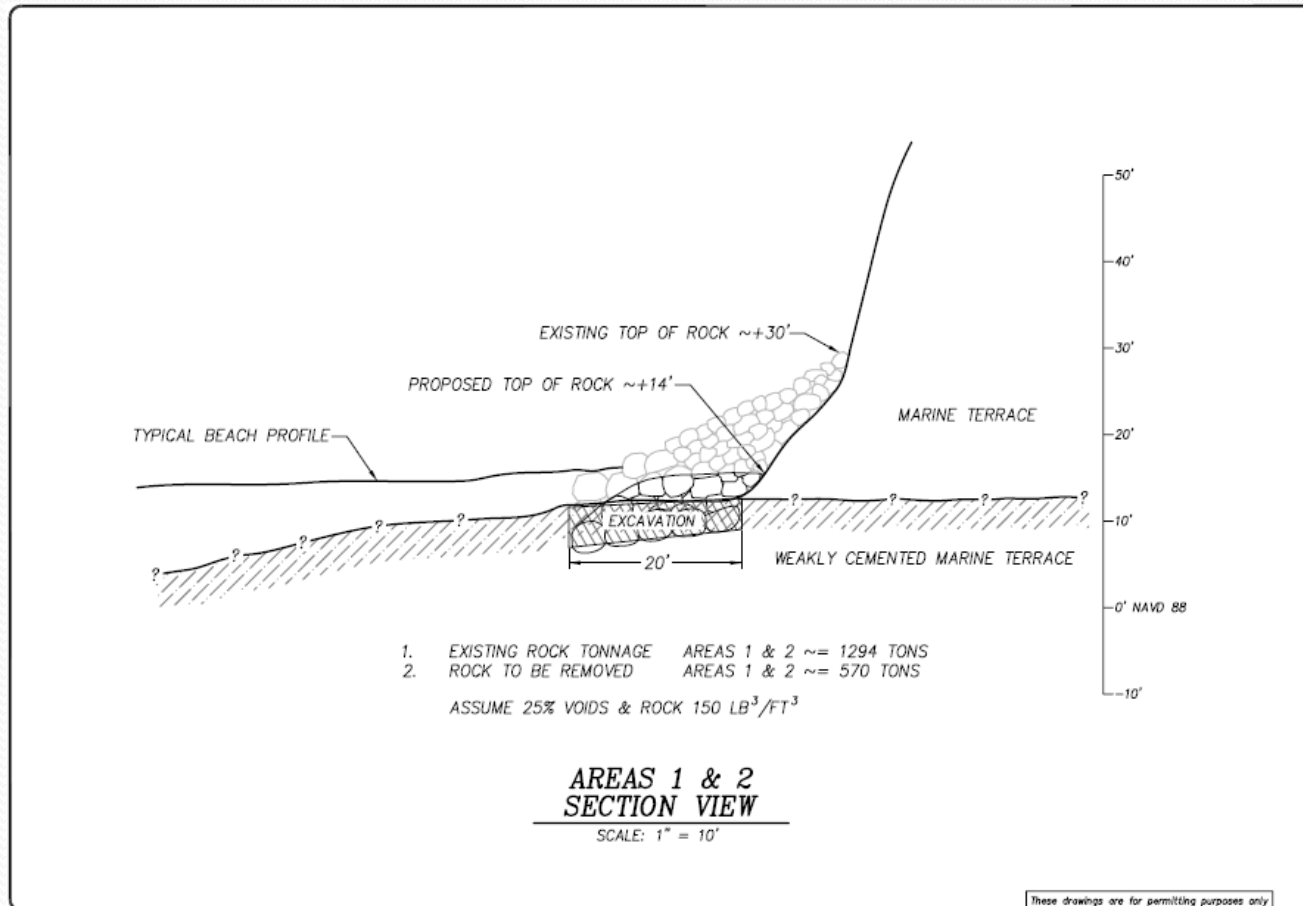
DATE: 8/22/11

SCALE: 1" = 20'

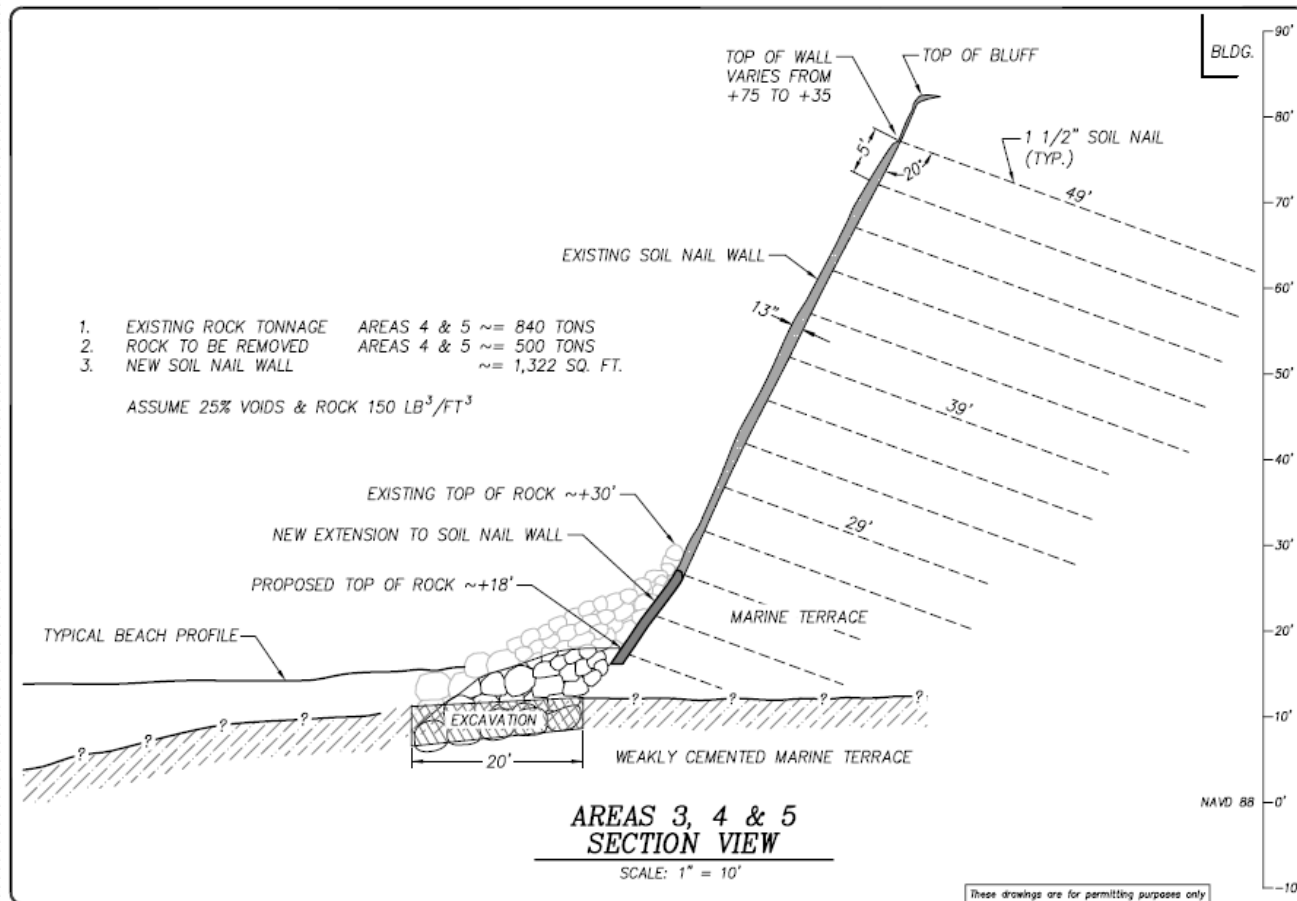
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S-1

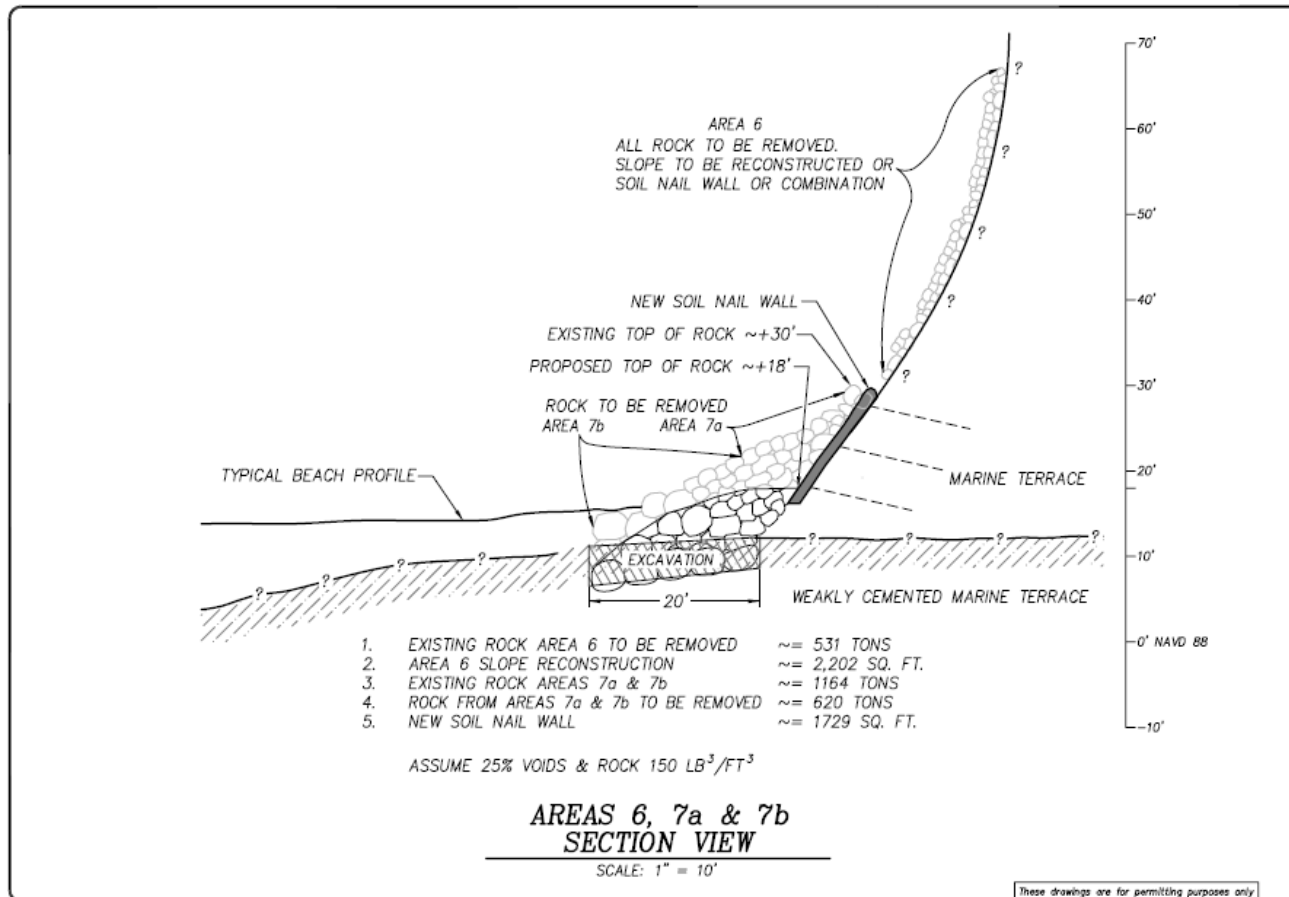
Revised Project Plans—Profiles



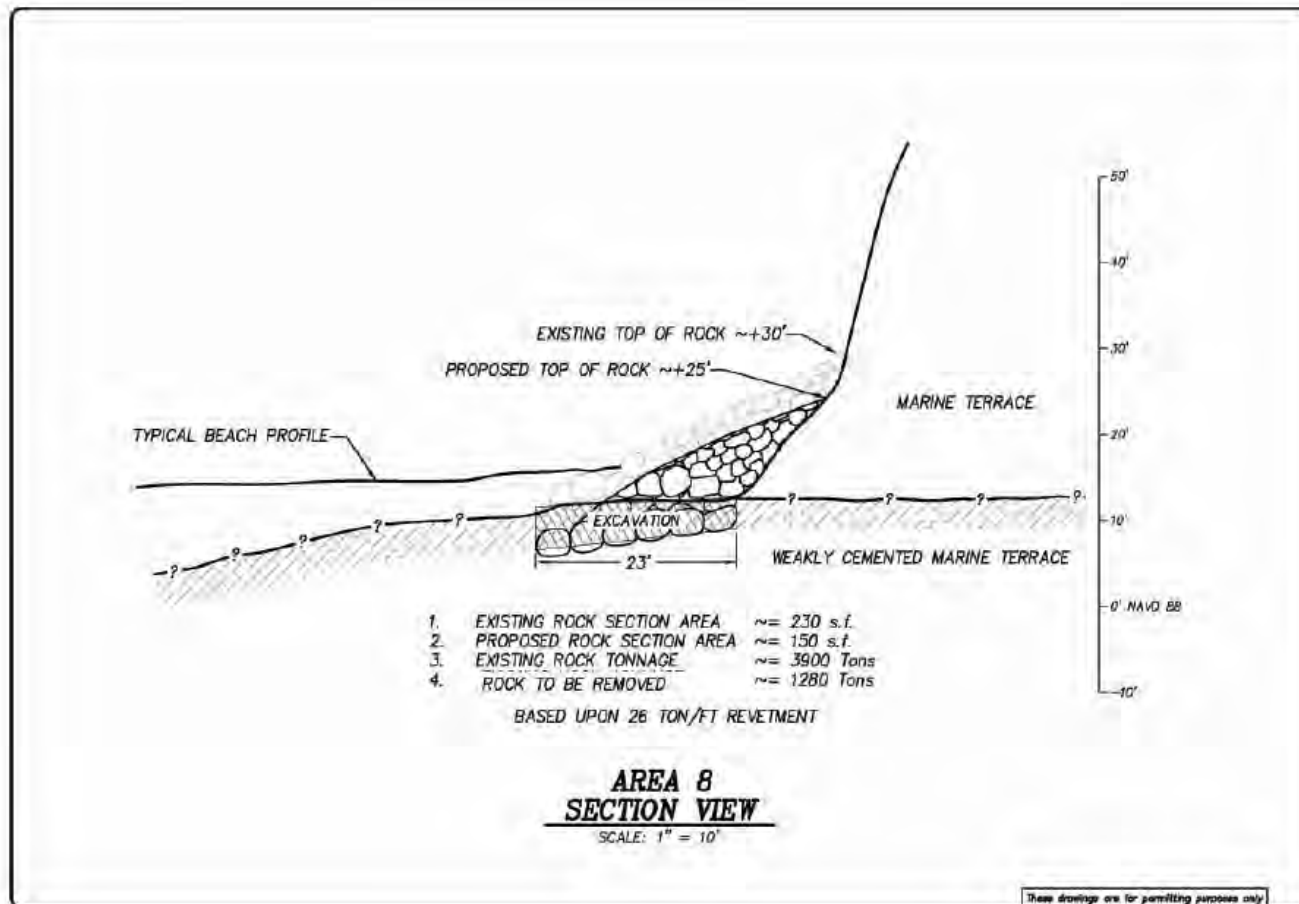
Revised Project Plans—Profiles



Revised Project Plans—Profiles



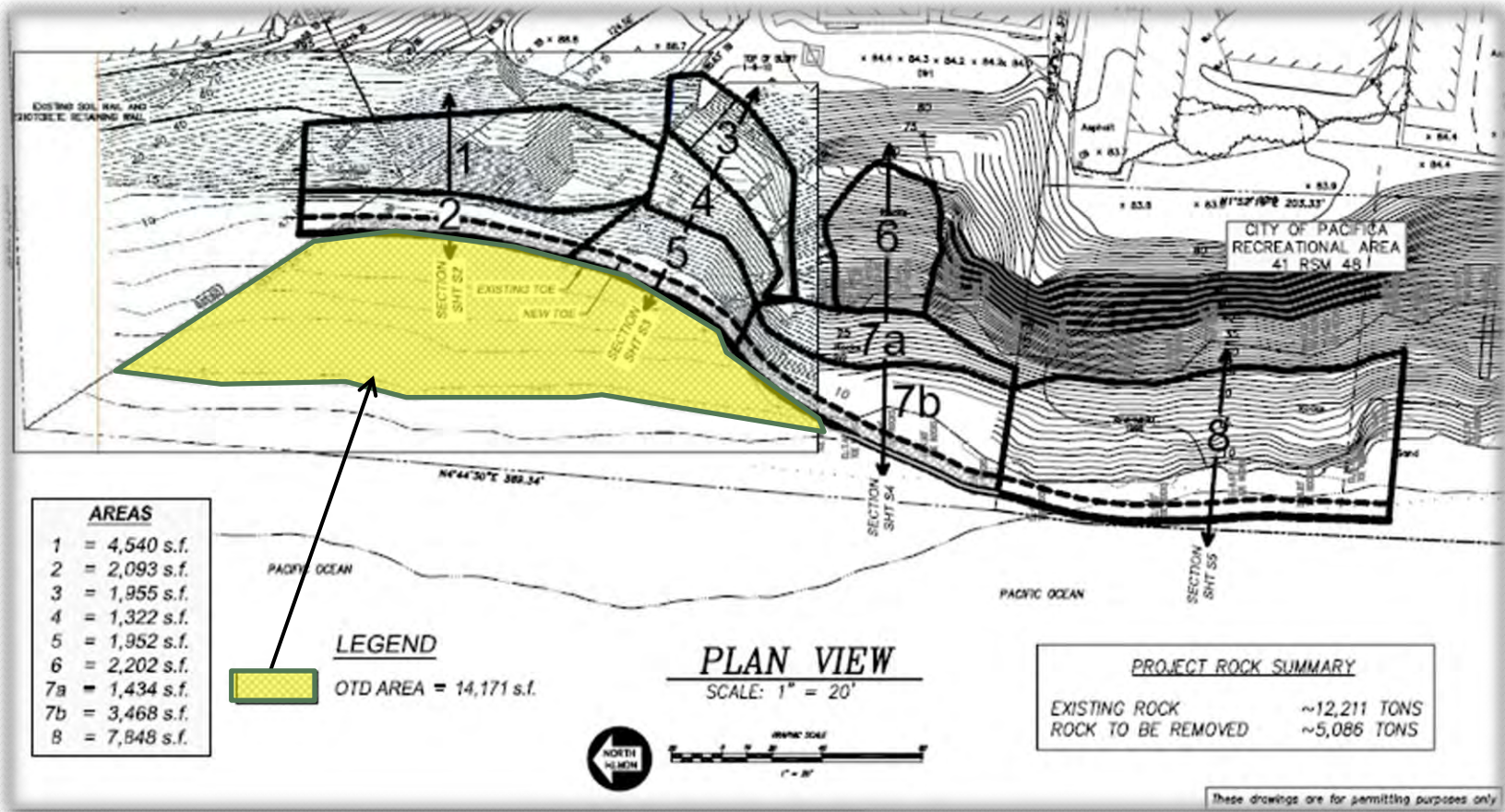
Revised Project Plans—Profiles



Proposed Mitigation

- **\$289,014.96** to mitigate associated impacts of development on regional sand supply
- Offer to dedicate **14,171 sq. ft.** of applicant's beach property as lateral public beach access

Offer to Dedicate



Staff Recommendation

- Approval with fifteen (15) special conditions.
- *“With the proposed sand mitigation, beach access/recreation mitigation and lateral access dedication, as well as the limitation on the time for which the shoreline protection is approved, the impacts of the proposed shoreline protection on regional sand supply and public access and recreation will be mitigated to the maximum extent feasible.”*

Conclusion

- Aimco has worked cooperatively with Staff for years to resolve a permitting issue created by previous owners.
- Revised project results in a significant reduction in rock on the beach, thereby improving lateral access and protecting visual resources.
- Aimco requests approval of the revised project as recommended by staff.

From: Bart [mailto:wavetool@earthlink.net]
Sent: Tuesday, September 27, 2011 6:29 PM
To: Nicholas Dreher; Renee Ananda
Subject: Re: October 7, 2011 Meeting

Hi Nick,

Sort of an ole hat at this. I have appeared before the Commission a couple of times on various projects. Yes, I have some serious concerns regarding the AIMCO project that I will share in a written response to the Commission. The first concern is the construction of the revetment at Aimco it is substandard that I will share in detail. There doesn't appear any plans for an upper drainage system and that area has specific problem as there is a swimming pool that catches run off water from the upper bluff and cannot escape from the pool. The area in question is causing the bluff to erode further (behind the revetment) and the soil nail wall at the north point is being outflanked by the bluff.

Finally, the revetment at 380 is blocking lateral access to the north portion of Esplanade Beach both public and when property owners north of the revetment, need to make repairs or have an emergency, the only access point is the City property at 400 Manor and across the Aimco Revetment.

Attached, are two links from ABC News Channel 7 Sky7 that indicates the problem very well. The area of the pool is extremely wet and the waves are crashing on the Aimco revetment. Click on the link and the video will play within a few seconds after a short intro. You may have to copy and then paste in your browser to see the video.

<http://abclocal.go.com/kgo/video?id=7213889&syndicate=syndicate§ion>

<http://abclocal.go.com/kgo/video?id=7237976&syndicate=syndicate§ion>

So Nick, I have several legitimate concerns with the Aimco project that require some serious thought.

Regards,

Bart Willoughby

----- Original Message -----

From: Nicholas Dreher

To: Renee Ananda ; Bart

Sent: Tuesday, September 27, 2011 2:18 PM

Subject: RE: October 7, 2011 Meeting

Hi Bart,

We have not yet met, but I encourage you to give me a call regarding the Aimco matter. I would like to know what you intend to say and any concerns/issues you plan to raise. I would appreciate the heads up, in order to adequately respond and to put any written comments you have into an addendum – for the Commissioners and public in advance of the hearing.

Typically, during public comment or during a public hearing on a particular item, speakers get approximately 3 minutes to speak (it is unlikely you will receive 5 min, so do not plan for 5 min, plan for 3 min). Moreover, the rebuttal you reference seems premature, considering I have not yet heard your concerns regarding this project and therefore we have not had an opportunity to respond. There will be audio and visual equipment on hand and you can arrange your video with the cal-span folks upon your arrival at the hearing. The Aimco project (October hearing in Huntington Beach) will not be on the same agenda as dollaradio (likely a November hearing item – Renee correct me if I am wrong).

I look forward to discussing this matter with you.

Thanks,

Nicholas B. Dreher
Coastal Program Analyst
California Coastal Commission
(415) 904-5251
ndreher@coastal.ca.gov

From: Renee Ananda
Sent: Tuesday, September 27, 2011 8:52 AM
To: 'Bart'
Subject: RE: October 7, 2011 Meeting

Bart,

Yes. I received the fax. Thank you. Dollaradio will not make it for the October meeting; we plan to put it on in November. I don't know if there is a projector with video feed. We usually ask people to put their visual presentations on a thumb drive. I can check. Nick Dreher is the analyst handling Aimco (I may have referred you to him already, however, just in case ... if you need to coordinate with him he can be reached at ndreher@coastal.ca.gov . RTA

From: Bart [<mailto:wavetool@earthlink.net>]
Sent: Monday, September 26, 2011 6:15 PM
To: Renee Ananda
Subject: October 7, 2011 Meeting

Hi Renee,

Did you receive the fax that I sent you on ATF for Dollaradio? Still putting all the exhibits together and waiting on RJR for the cross-section as built documents to include in the package.

Also, I have a 1 minute 45 Section video on the Pacifica Bluffs that I want to play for the Commissioners at the Meeting. I have a laptop with DVD. Will there be a projector with video feeds so I can play the video for the Commissioners? I will need this for the 5 minute rebuttal to the Aimco permit and presentation for Dollaradio.

Bart
415.238.8837 Cell

BART WILLOUGHBY

October 4, 2011

First Class Mail with Confirmation

Mr. Nicholas B. Dreher
Coastal Analyst
California Coastal Commission
North Central Coast District
45 Fremont Street, Suite 2000
San Francisco, CA 94105-2219

Re: AIMCO Coastal Development Permit (2-08-020)

Dear Mr. Dreher:

This letter is the written response and public comment on the above referenced permit, for the AIMCO properties located at 360 and 380 Esplanade Avenue, Pacifica, California. Moreover, this response is a coordinated effort, as the authorized agent on behalf of the Millard Tong Properties (310 & 320 Esplanade) and Dollaradio Station¹ at 100 Palmetto Avenue, Pacifica, CA. Both properties are directly affected by the AIMCO permit request. Additionally, while I am the authorized agent for Tong and Dollaradio, I am resident of the area and live along the Esplanade Bluff (approximately 12 years).

My knowledge of the facts in this instance is based upon daily observations of the construction of the AIMCO revetment and soil nail wall, and the conditions along the entire Esplanade Beach.

The Esplanade Beach General Information

On the Esplanade Beach Bluffs, north of the AIMCO revetment, located at 380 Esplanade are several properties. **Dollaradio Station** (a historical landmark) 100 Palmetto Avenue; **Pacific View Villas Condo Association** (13 individual condo owners) 200-220 Palmetto Avenue; **Lands End Apartment Complex** (260 units) 100 Esplanade Avenue; **La Esplanade Apartment** (Tong properties with 40 units) 320 & 320 Esplanade; **Samsami** (red tagged 13 units) 330 Esplanade; **San Mateo Real Estate** (13 units) 340 Esplanade and 13 units located a 350 Esplanade Avenue, Pacifica.

¹ Dollaradio Station is the northern most property located along the Esplanade Beach and has a pending ATF (2-11-031G). Dollaradio is ultimately affected by AIMCO permit request.

As indicated above Dollaradio has a pending permit. Pacific View Villas has a partial revetment under Coastal Permit **3-82-228** and Waiver Permit **2-10-012-W**². Lands End currently is constructing a seawall with a public access provision under permit **2-10-007 G**. Tong Properties 310 & 320 revetment was built under emergency permit **2-09-002G** and currently has a pending permit **2-03-018**³

The Samsami property 330 Esplanade was subject to severe erosion in 2009 & 2010 that prompted evacuation of the 13 residents of the property. The City of Pacifica “red tagged” the property and it remains vacant as of this date. Moreover, the Samsami property was issued an emergency permit **2-09-021 G** for rock riprap at the toe of the bluff and next to the AIMCO property. Additionally, the Commission issued permit **2-10-004G** for a soil nail wall at 330 (**similar to the current AIMCO soil nail wall**) that failed miserably due to the fact there was no drainage behind the partially built soil nail wall. The 330 property is currently involved in several litigations in the San Mateo County Superior Court in consolidated matters 496610 (Drill Tech same Soil Nail Contractor for AIMCO) and 496988 Engineered Soils Repairs.

340 and 350 Esplanade are listed in AIMCO Plan View on S1 Area 1 & 2 and subject of the current AIMCO permit request.

Ocean Shore Railroad Easements

The Ocean Shore Railroad (“OSRR”) before the 1906 earthquake had several easements on the various properties listed above (Dollaradio, PVV and Lands End) and laid track bed across the sandy bluffs at those properties. After the 1906 earthquake, the OSRR abandon the line around Mussel Rock leaving the track bed with thousands of tons of 1-3 ton riprap along the upper bluff, at the properties indicated. As time elapsed, the track bed along with the thousand of tons of rock riprap, ended up on the Esplanade Beach. Currently, there is several thousand tons of rock on the Esplanade Beach from the OSRR that is not naturally occurring at this location.

This also explains, in some degree, to written reports of Franciscan Greenstone Bedrock being located on the Esplanade Beach. The majority of auger reports for the Esplanade were done by hand augers that ran into a large part the OSRR rock riprap littered on the beach. In May 2009 as part of the analysis for the Tong project, a search for Franciscan Greenstone Bedrock was undertaken with a power auger at a depth of 40 feet (**Exhibit A**).

² Pacific View revetment collapsed in the El Nino storms of 2009 & 2010 and was rebuilt under the waiver permit. Recently discovered, the revetment is partially protecting a public landfill on the PVV properties and a lateral sewer line is located on the upper bluff 27' away from the bluff edge. There now exist, two gaps between PVV at the northern portion of the PVV revetment to Dollaradio and the southern portion of the PVV revetment to Lands End seawall. Moreover, there was a complete lack of oversight by the Commission on the PVV original revetment (made by immaterial amendment) that authorized 30K tons of rock to protect the landfill. There is an estimated 3K-ton protecting the landfill.

³ The Tong revetment at 310 & 320 is subject to litigation in San Mateo Superior Court Case No. 494786 naming the contactor Engineered Soils Repairs Inc., as a cross-defendant for the negligent design and construction of a substandard revetment at the toe of he bluff at 310 & 320. Tong will be submitting a request to the Commission to make the revetment at 310 & 320 temporary, as a rock riprap revetment at this location is simply not a long-term solution.

Each red dot on the location plan (EX-A) indicates where the continuous flight auger probed. This included the AIMCO area listed on the AIMCO PLAN REVIEW at AREA 1, 2, 3, 4, 5 and portions of 7a and 7b. According to the auger reports, NO Franciscan Greenstone Bedrock was located at the AIMCO locations.

The AIMCO Proposed Plan as Defined by Staff Report

Accordingly, AIMCO proposes a +12 MSL at **AREA 1 & 2** leaving 1,567 tons of rock and removal of 1,233 tons of riprap from this location. A +18 MSL at **AREA 3, 4 & 5** leaving 527 tons of rock and removing 643 tons of rock riprap from this location. Additionally, a new soil nail wall will be constructed at **AREA 4 and 7b**. At **AREA 6** there is the potential for a soil nail wall, if a vegetated process does not work. Additionally, 531 tons of rock will be removed from the middle bluff at this location.

At **AREA 7b** +18 MSL leaving 1500 tons of rock and removing 1400 tons of rock riprap from this location. **AREA 8** will be raised to +25 MSL leaving 2,620 tons of rock and removing 1,280 tons of riprap from this location.

For the reasons herein listed below the following is contended:

1. The current revetment at locations **AREA 2, 5 and 7b** are substandard.
2. There is no upper drainage system where a swimming pool still resides on the upper bluff at **AREA 1 & 3** that is currently causing the soil nail wall northern portion at **AREA 3 & 4** to be outflanked. Additionally, the revetment at **AREA 2 & 5** are severely affected by the erosion behind the revetment caused by the pool.
3. While the revetment at **AREA 7b and 8** will be moved uniformly inland about 2-4 feet (staff analysis at page 22) is not sufficient to provide lateral access across the revetment for public access. Additionally, given the properties to the north of the revetment (as listed above with continuing problems) lateral access across the revetment, with any machine to work or make emergency repair is problematic.

The AIMCO Revetment at AREA 2, 5 & 7 is Substandard

As indicated in Exhibit A attached, there is absolutely no Franciscan Greenstone Bedrock at the locations of the AIMCO revetment referenced above. As of June 10, 2009, AIMCO was aware, through Sean Finnegan that there was no Franciscan Greenstone Bedrock on the AIMCO properties at beach level, (**Exhibit B**). Mr. Finnegan ignored the analysis and findings, continuing to contend, that the revetment built by emergency permit in 2009, would be keyed into Greenstone Bedrock.

The contractor that built the AIMCO revetment, Michael Roberts to my knowledge, never built a revetment along the coast before the AIMCO revetment. Attached as (**Exhibit C**) is a photo of the keyway being built at the AREA indicated above. Additionally, a whole series of photos in PDF format was uploaded to the Coastal Commission ftp site shortly after the construction of the revetment, showing the entire construction of the AIMCO keyway at this location. The rock was end dumped at the

AREA was not interlocked (**Exhibit D**). The Esplanade Beach Area is a high-energy wave action location and it imperative that appropriate size rock be utilized in the keyway and cap rock. From the entire photos, uploaded into the Commission's ftp site and the construction of the keyway, it is clear, the current revetment "as built" will continue to move toward the ocean. The rock is not keyed into competent material. The rock "end-dumped" and not interlocked, will move in times of high tide and storm swells with large high energy waves. Thus, requiring continuous maintenance and eventually, the revetment will encroach on state property.

As discussed below the swimming pool located on the upper bluff in the low lying area is causing the revetment at this AREA to further deteriorate.

AIMCO has No Upper Bluff Drainage Plan. The Buried Swimming Pool is Causing Continue Bluff Erosion behind the Revetment & Soil Nail Wall.

At **AREA 1, 3 & 4** there is a buried swimming pool still located on the upper Bluff on the AIMCO property (**Exhibit E**). There is nothing in the staff report, nor in the AIMCO plans, that address the problem with the low lying area where the swimming pool is buried and continues to cause erosion behind the revetment, at AREA 2, 5, 7 and the soil nail wall, at AREA 3, 4 & 5. (**Exhibits F, G & H**)

From the recent photos, it can be seen in EX-F, that the area is low lying and that all water from 330, 340 & 350 all run into the buried pool and area whenever there is a rainstorm. See the former sidewalk at the right of the photo EX-F. Then look at EX-E the upper properties that drain into this area.

From photos EX-G (beach and upper bluff views) it is clear that the pool area is causing a major problem behind the current existing revetment at AREA 1. The bluff erosion is beginning to outflank the northern portion of the current soil nail wall at AREA 3 & 4. As can be seen in EX-H the poorly constructed revetment at AREA 1 and the continued upper bluff erosion behind the current revetment at AREA 1 is problematic.

AIMCO has to deal with the drainage problem on the upper bluff that comes from 330, 340 & 350 and the swimming pool that is buried under the bluff at the AIMCO property and the water that accumulates there.

The Revetment at 380 will Continue to Block Lateral Access Public & Otherwise

AIMCO proposes and staff report suggests, that removal of some rock at the 380 revetment, will improve lateral access across the revetment by 2 to 4 feet (*Id at page 22 of 56*). Accordingly, the access will improve "during times when beach sand levels are high." This unfortunately, is an unobserved analysis by AIMCO and Commission Staff. **Exhibit I** shows the current conditions at low tides. Moreover, this year, as in last year (2010) the beach accumulation of sand along the Esplanade Beach has been almost, non-existent. This summer, (2011) there was more scouring of the Esplanade Beach. This was due primarily because of large swells generated by winds (from the low pressure center north of California and located in Oregon) that continued to eat away sand from

the beach. Given the Commission's studies on sea level rise on global conditions there is expected 2-4 foot rise in sea level between now and the next decade.

Lateral access to the northern portion of Esplanade Beach at 380 is paramount for public access. Additionally, for Dollaradio, PVV, Lands End, Tong & Samsami to make needed repairs or respond to an impending emergency. I personally, have been caught on the 380 revetment and it is extremely difficult, to navigate as a pedestrian, across the revetment. The process for public lateral access should include, building a small single person pedestrian bridge across the 380 revetment. Additionally, AIMCO should be required to give lateral access across the 380 revetment, to property owners north of the revetment to make repairs or respond to an emergency.

Finally, the general corporate attitude of AIMCO and Mr. Finnegan is one of coarseness, as it relates to the Esplanade Beach Community. This coarseness is apparent in several email exchanges between Mr. Finnegan and I, on several important issues. However, the inexperienced contractor Michael Roberts, engaged with track equipment in the surf along Esplanade Beach was serious (**Exhibit J**). Mr. Finnegan appeared to be deliberately indifferent as to the seriousness of the issue.

Very truly yours,

Bart Willoughby

CC: City of Pacifica, Lands End, PVV.

EXHIBIT A

POWER AUGER REPORTS
ESPLANADE BEACH SHOWING
NO FRANCISCAN GREENSTONE
BEDROCK AT THE AIMCO SITE



Notes:
 1. Refer to Assessor's Block 413
 2. Refer to Assessor's Block 413

Continous Flight Auger Probe
 Model 1000
 100' A. Right-of-Way

NO SCALE



	Prepared by Date		Engineered Soil Repairs, Inc. 1267 Springbrook Road Walnut Creek, CA 94597 Tel. No. (925) 210-2100 Fax: 925-210-2100	Continous Flight Auger Probe Location Plan Esplanade (see sheet) 100' A. Right-of-Way Pacific Ocean	
	Checked by Date		Date	Date	

EXHIBIT B

EMAIL JUNE 10, 2009 from
Willoughby to Finnegan
Subject Auger Reports on
Franciscan Greenstone Issue

Bart

From: "Bart" <wavetool@earthlink.net>
To: "Finnegan, Sean (Redev - West Coast)" <Sean.Finnegan@aimco.com>
Sent: Wednesday, June 10, 2009 8:58 PM
Attach: 20090610173729335.pdf, 20090610173742958.pdf
Subject: Auger Reports for Esplanade Beach

Hey Sean,

You should probably share this information with the folks who are designing your revetment. I would bet you even money, that the revetment at 380 is not sitting on top of Greenstone Bedrock. Probably the marine terrace deposits but Greenstone-very doubtful. This auger report would explain the rationale for the revetment at 380 moving ocean wards.

The auger report went to depths of 40' and no Greenstone Bedrock was found. Very interesting! I am sending this info to Brian Collins at the USGS.

Regards,
Bart
415.238.8837 Cell
650.355.4443 Facsimile

10/2/2011

EXHIBIT C

PHOTO OF KEYWAY OF AIMCO AREA 1
UNDER CONSTRUCTION IN 2009 (FULL
SERIES OF PHOTOS PDF UPLOADED TO
COASTAL COMMISSION FTP SITE)

Keyway C 380 No Marine Towel - Impregnated

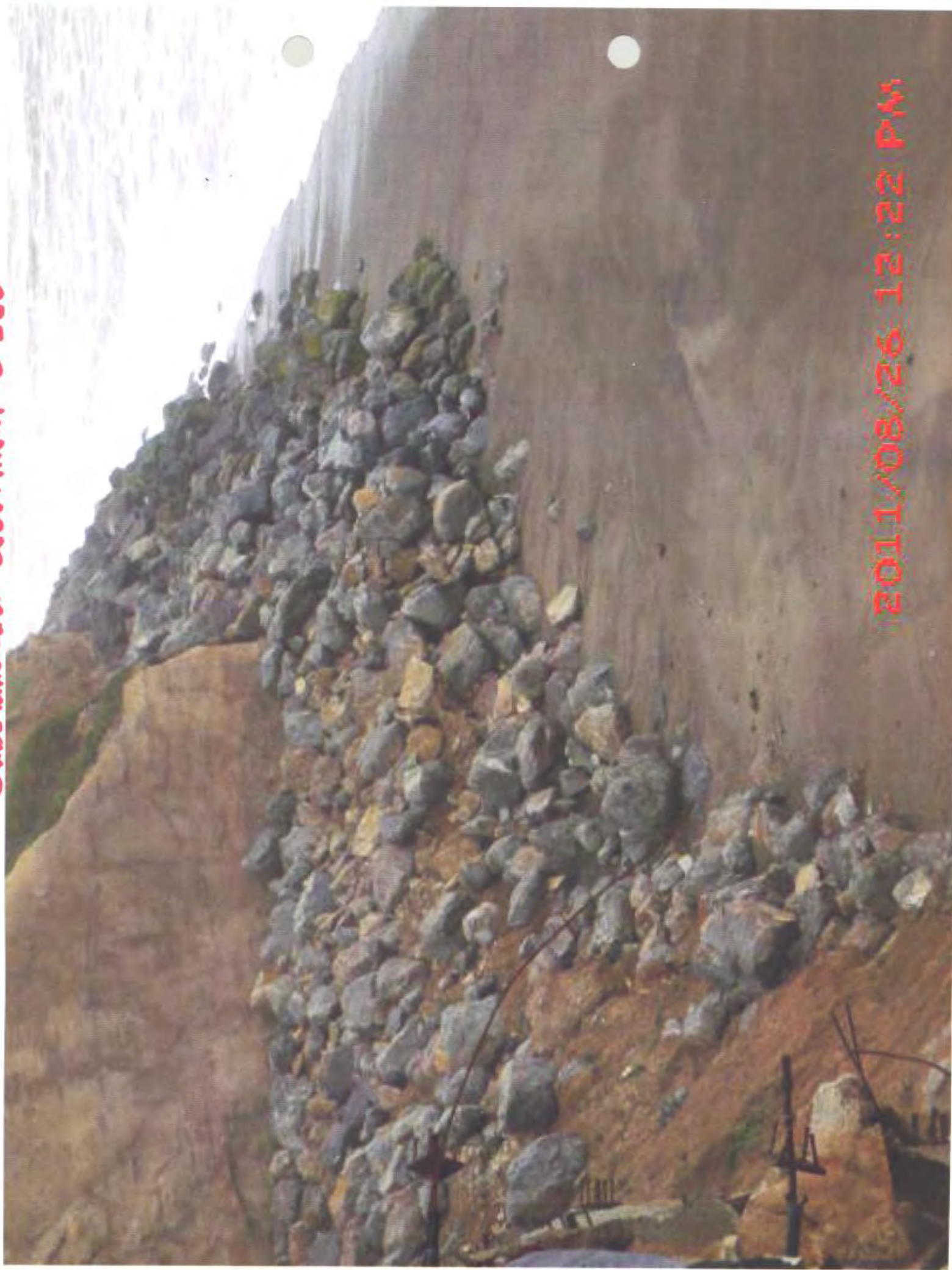


2009/12/26
14:49:43

EXHIBIT D

PHOTO OF AIMCO AREA 1
UNDER CONSTRUCTION IN 2009
SHOWING ROCK WAS NOT INTERLOCKED
AND END DUMPED

Substandard Revetment C 380



2011/08/26 12:22 PM

EXHIBIT E

AERIAL PHOTO OF POOL HOUSE
LOCATED ON AIMCO PROPERTY
1965 POOL WAS CONSTRUCTED
AND LATER DECOMMISSIONED
AND FILLED WITH DIRT



EXHIBIT F

CURRENT PHOTO OF WHERE
POOL IS BURIED ON AIMCO
PROPERTY AND SHOWING
330, 340 & 350 RUNOFF INTO
THE LOCATION.

UPPER Bluff Annuo Pool Area

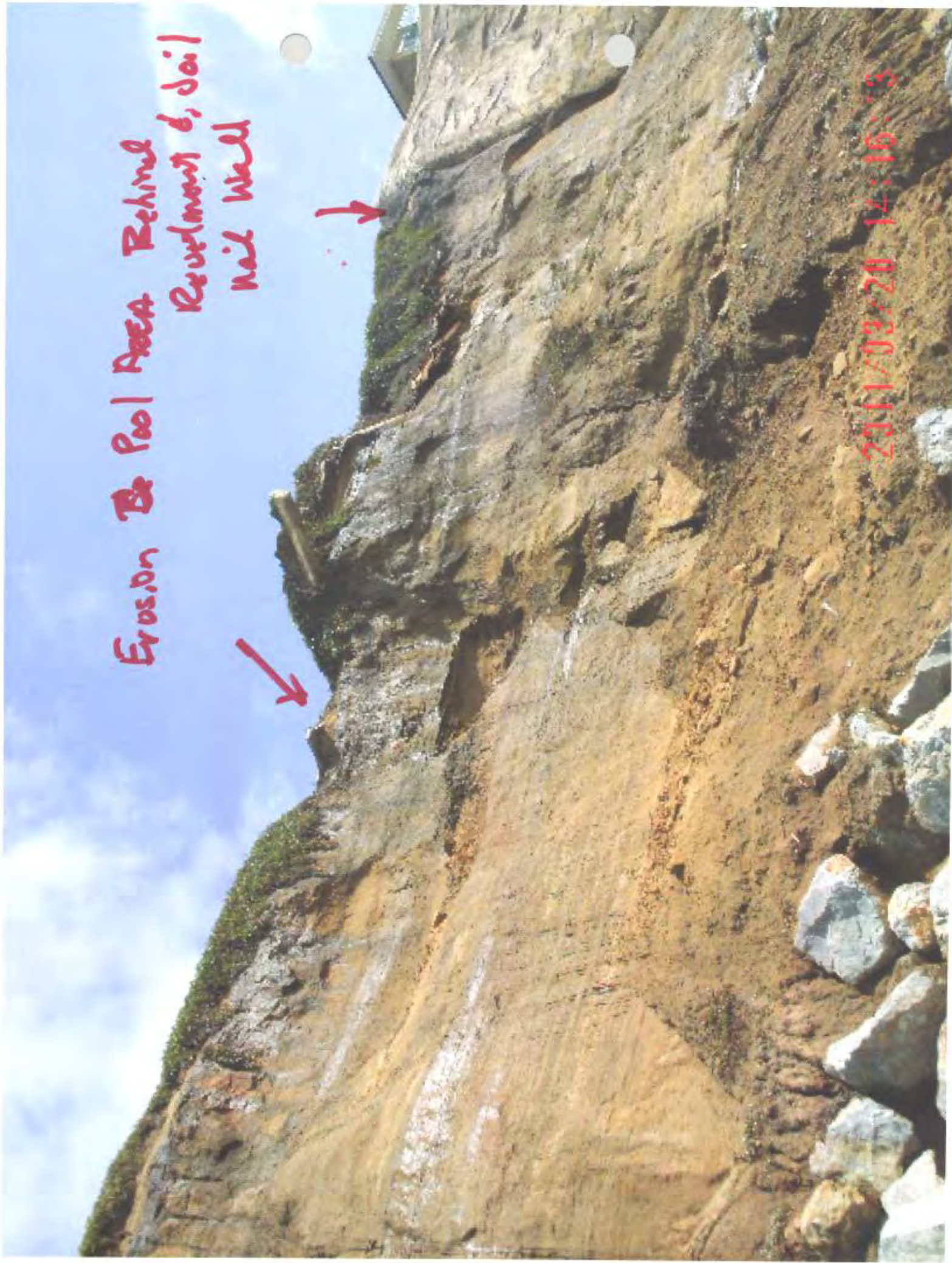


2011/09/02 11:39 AM

EXHIBIT G

(2) CURRENT PHOTOS UPPER & LOWER
BLUFF AT AIMCO SHOWING EROSION
BEHIND REVETMENT AT AREA 1 &
SOIL NAIL WALL AREA 3 & 4 FROM
BURIED POOL

Erosion Behind Pool Area
Revetment of Soil
Nail Wall



Current Erosion of Bluff c Amwo Pool Area

— Pool
Deck

OUTFLOW
Soil Nail Wall



2011/05/21 13:12:49

EXHIBIT H

CURRENT PHOTO SHOWING
BLUFF EROSION AT AREA 1
BEHIND THE AIMCO REVETMENT
AND THE SUBSTANDARD "AS
BUILT" AIMCO REVETMENT

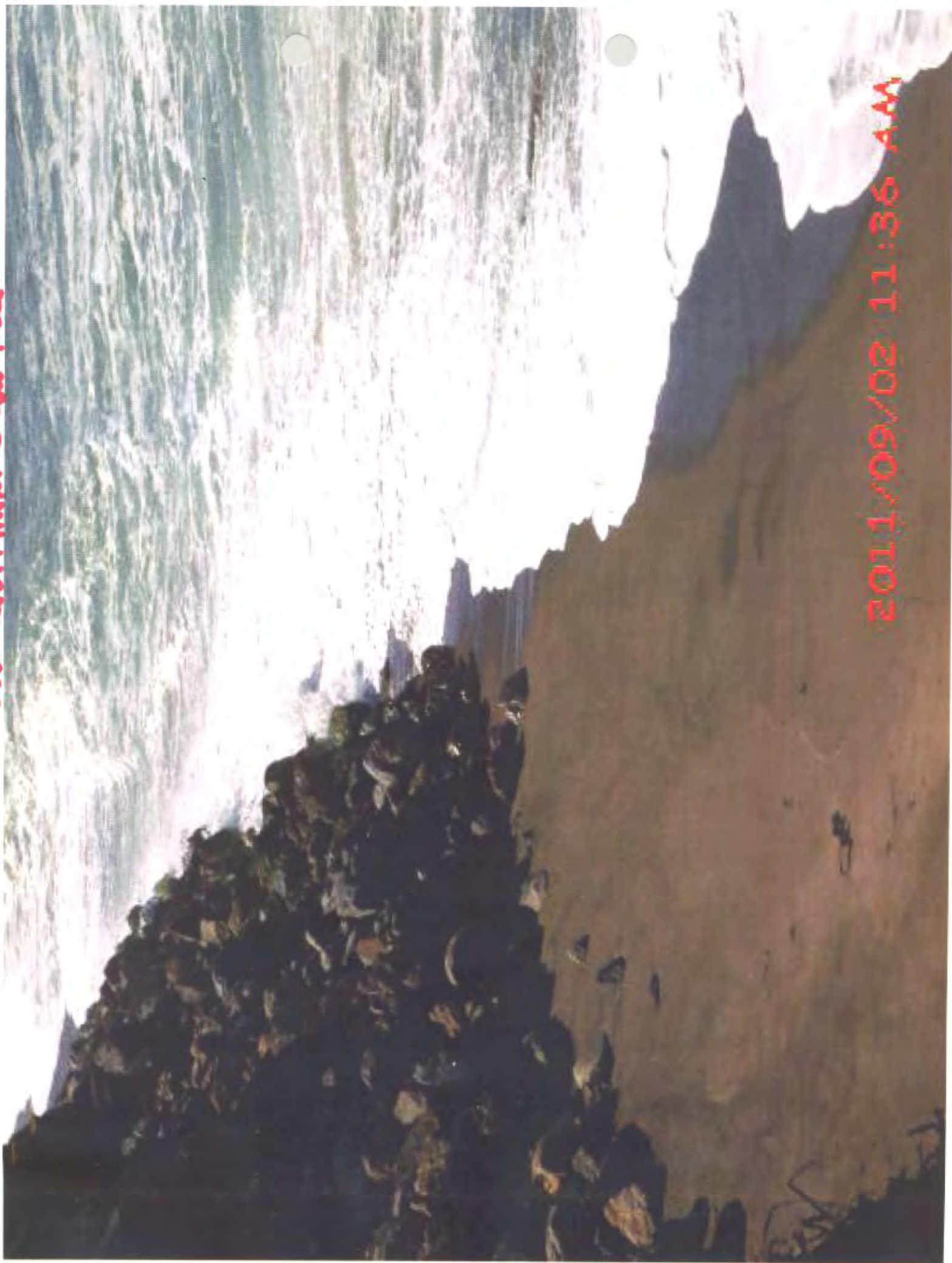
Low Blue Area
Pool location
Pool Deck Erosion Behind Retention



EXHIBIT I

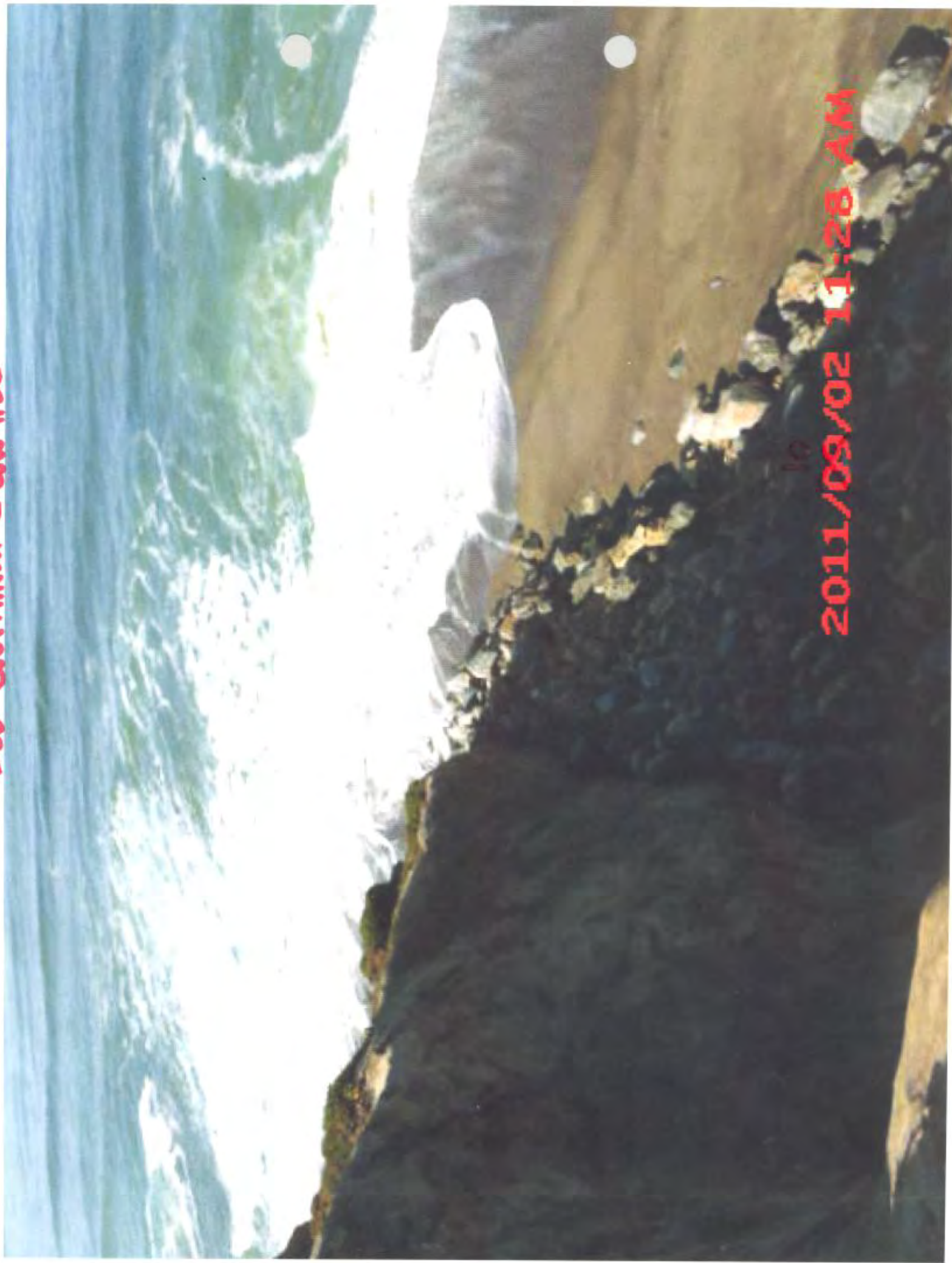
(2) CURRENT PHOTO SHOWING
REVTMENT AT 380 ESPLANADE
AT LOW TIDE

380 Revert mud & low tide



2011/09/02 11:36 AM

380 Environment & Low Tides



16

2011/09/02 11:28 AM

EXHIBIT J

EMAIL TO AIMCO SEAN FINNEGAN
SHOWING MICHAEL ROBERTS TRACK
EXCVATOR WORKING IN THE SURF
ON ESPLANADE BEACH

Bart

From: "Finnegan, Sean (Redev - West Coast)" <Sean.Finnegan@aimco.com>
To: <wavetool@earthlink.net>; "Van Sickle, James (Sonoma)" <James.VanSickle@aimco.com>
Sent: Sunday, August 22, 2010 6:25 PM
Subject: Re: Front Page of Pacifica Tribune

Bart,
Please refrain from sending unconstructive emails.

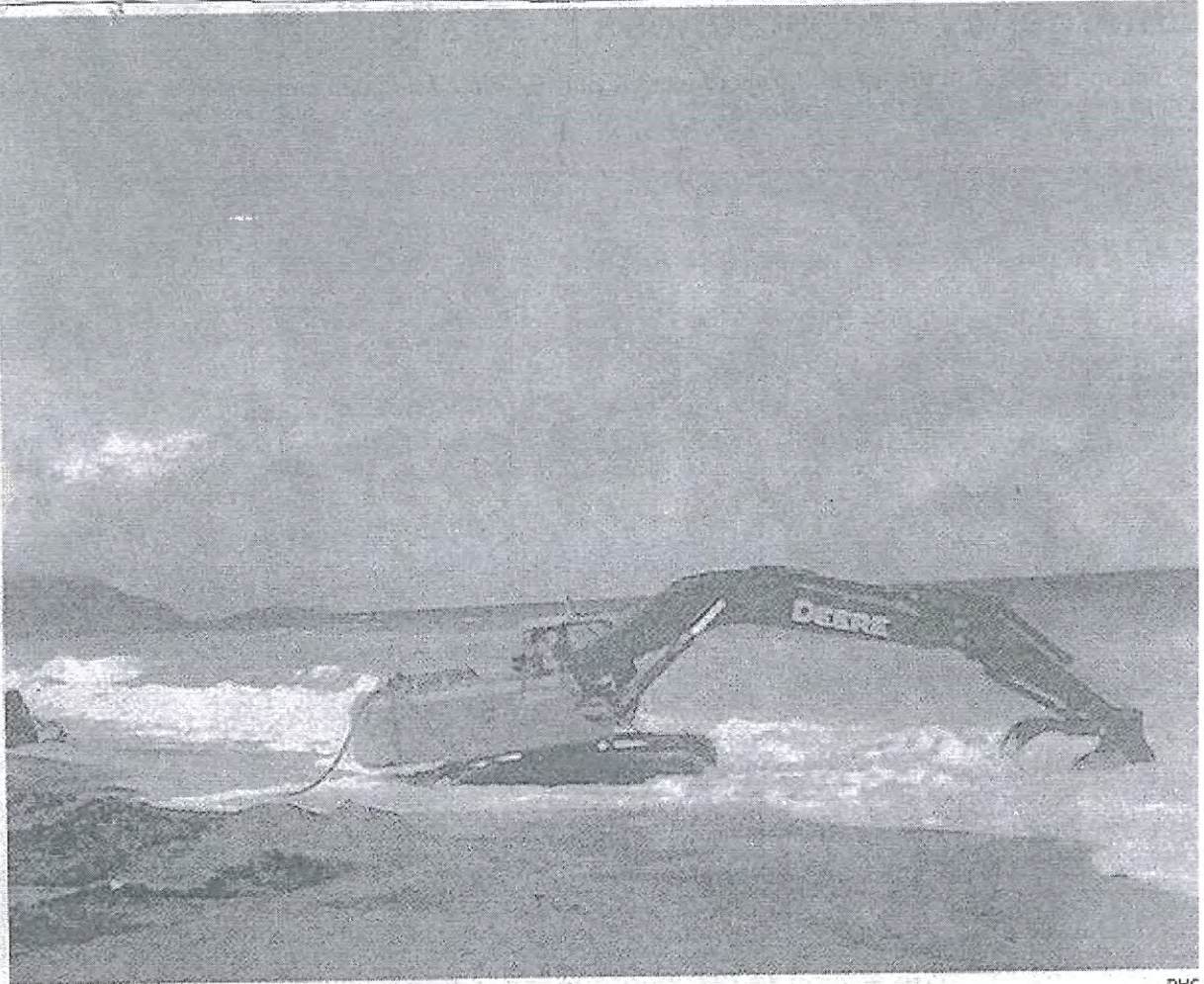
Sean Finnegan, Aimco

From: Bart
To: Van Sickle, James (Sonoma)
Cc: Finnegan, Sean (Redev - West Coast)
Sent: Sun Aug 22 16:34:54 2010
Subject: Front Page of Pacifica Tribune

Jim,

Here is the photo on the front page of the Pacifica Tribune and Michael Roberts working on the revetment at 360 & 380 Esplanade. Just and FYI.

Regards,
Bart Willoughby



PHC

Water works

This giant excavator seems to be stuck in the surf at high tide, but it was really engaged in revetment work as part of a private operation below 380 Esplanade. Several private property owners have hired experts to evaluate the integrity of the Coastline bluffs in the wake of serious erosion that has captured the attention of Bay Area media.



From: Bart [mailto:wavetool@earthlink.net]
Sent: Tuesday, October 04, 2011 5:07 PM
To: Nicholas Dreher
Cc: Charles Lester; farbsteink@ci.pacifica.ca.us; whiteg@ci.pacifica.ca.us; SMREdt@aol.com
Subject: Re: Aimco Document & Exhibits

Nick,

Everyone who has read the Aimco Staff Report is having a very hard time understanding the reduction of the revetments at the locations indicated on Aimco S1. The staff report doesn't provide any supporting data for the reasoning behind the reduction. The beach profiles up and down the Esplanade from Dollaradio to the RV Park are almost identical. The bluff shapes from Dollaradio down through the City property are equally consistent.

The Collins and Sitar 2008 report shows the similar geotechnical properties and basic engineering design approach and principles remain essentially identical across the bluff in this area. Reduction of the revetments at the Aimco location will not provide a gain of 2-4 feet in lateral access (this appears to be the only reasoning according to staff report for reduction of the revetment). This is due to local scour attributed to the revetment, decreased sand supply and long term sea level rise.

My concern is for low frequency wave events that could over top the reduced revetments and further reduce the bluff factor of safety in this area. Plus given what happened in 2009 the reduction of the revetment will accelerate bluff instability and potentially threaten existing structures at 330, 340 & 350. Given the lack of drainage behind the revetment on the upper bluff (the pool) is clearly a receipt for disaster all over again...something I do not want to have to relive!

Bart Willoughby
415.238.8837 Cell

----- Original Message -----

From: Nicholas Dreher
To: Bart
Sent: Tuesday, October 04, 2011 10:41 AM
Subject: RE: Aimco Document & Exhibits

Thank you Bart. Yes, I received your emails and we will include this in the addendum.

Nicholas B. Dreher
Coastal Program Analyst
California Coastal Commission
(415) 904-5251
ndreher@coastal.ca.gov

From: Bart [mailto:wavetool@earthlink.net]
Sent: Tuesday, October 04, 2011 10:55 AM
To: Nicholas Dreher
Cc: Charles Lester
Subject: Aimco Document & Exhibits

Good Morning, Nick,

Can you confirm receipt of the documents sent yesterday via email. Comment letter plus exhibits. Also, the pdf file uploaded months ago on the Aimco revetment was delivered to the General Public Folder. Can you confirm that the Commission has this pdf file?

Also, according to the USPO the package is out for delivery. You should have in the morning mail that is delivered to the Commission Office in SF.

Regards,
Bart Willoughby
415.238.8837 Cell

From: Bart [mailto:wavetool@earthlink.net]
Sent: Wednesday, October 05, 2011 11:44 AM
To: Nicholas Dreher
Cc: Charles Lester; farbsteink@ci.pacifica.ca.us; ocampov@ci.pacifica.ca.us; whiteg@ci.pacifica.ca.us; rhodess@ci.pacifica.ca.us; Rjr; SMREdt@aol.com
Subject: Re: Aimco Document & Exhibits

Nick,

Thanks for the update on what is included in the addendum.

Nick, I am not sure that the City of Pacifica was aware that Aimco was going to remove rock from Area 8 (1,250 tons). Also, I have some major concerns with only +25MSL at this location. The City storm drain is located in AREA 8 (see City (4) photo) and removal of rock at this location could lead to more serious problems for the entire Esplanade and Manor area.

Also, regarding the revetments at AIMCO under +25MSL. Attached, is the revetment at 320 Esplanade (Tong) that was built according to ESR at +25 MSL. From the photo, you can see, the Tong revetment at 320 is being over-topped by the waves. 320 is less than 200' from the AIMCO revetments. This photo was taken January 2010 before the failure at 320 on January 21st.

So any revetment +25 MSL and below is subject to over topping at this location.

Regards,
Bart Willoughby
415.238.8837 Cell
----- Original Message -----

From: [Nicholas Dreher](#)
To: [Bart](#)
Sent: Wednesday, October 05, 2011 8:28 AM
Subject: RE: Aimco Document & Exhibits

Thank you Bart. I received this earlier yesterday and it is included in the addendum.

Nicholas B. Dreher
Coastal Program Analyst
California Coastal Commission
(415) 904-5251
ndreher@coastal.ca.gov

From: Bart [mailto:wavetool@earthlink.net]
Sent: Tuesday, October 04, 2011 8:27 PM
To: Nicholas Dreher
Cc: Charles Lester
Subject: Re: Aimco Document & Exhibits

Nick,

Thanks, here is a copy of a letter that I just received this evening from RJR Engineering. This backs up most of what was in my email that is part of the addendum.

Thanks again,
Bart Willoughby
415.238.8837 Cell
----- Original Message -----

From: [Nicholas Dreher](#)
To: [Bart](#)
Sent: Tuesday, October 04, 2011 3:17 PM
Subject: RE: Aimco Document & Exhibits

Hi Bart,

I will include this latest email in the addendum.

Thanks,

Nicholas B. Dreher
Coastal Program Analyst
California Coastal Commission
(415) 904-5251
ndreher@coastal.ca.gov

From: Bart [<mailto:wavetool@earthlink.net>]
Sent: Tuesday, October 04, 2011 5:07 PM
To: Nicholas Dreher
Cc: Charles Lester; farbsteink@ci.pacifica.ca.us; whiteg@ci.pacifica.ca.us; SMREdt@aol.com
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Bart Willoughby
415.238.8837 Cell

----- Original Message -----

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To: [Bart](#)

Sent: Tuesday, October 04, 2011 10:41 AM

Subject: RE: Aimco Document & Exhibits

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Nicholas B. Dreher
Coastal Program Analyst
California Coastal Commission
(415) 904-5251
ndreher@coastal.ca.gov

From: Bart [<mailto:wavetool@earthlink.net>]

Sent: Tuesday, October 04, 2011 10:55 AM

To: Nicholas Dreher

Cc: Charles Lester

Subject: Aimco Document & Exhibits

Good Morning, Nick,

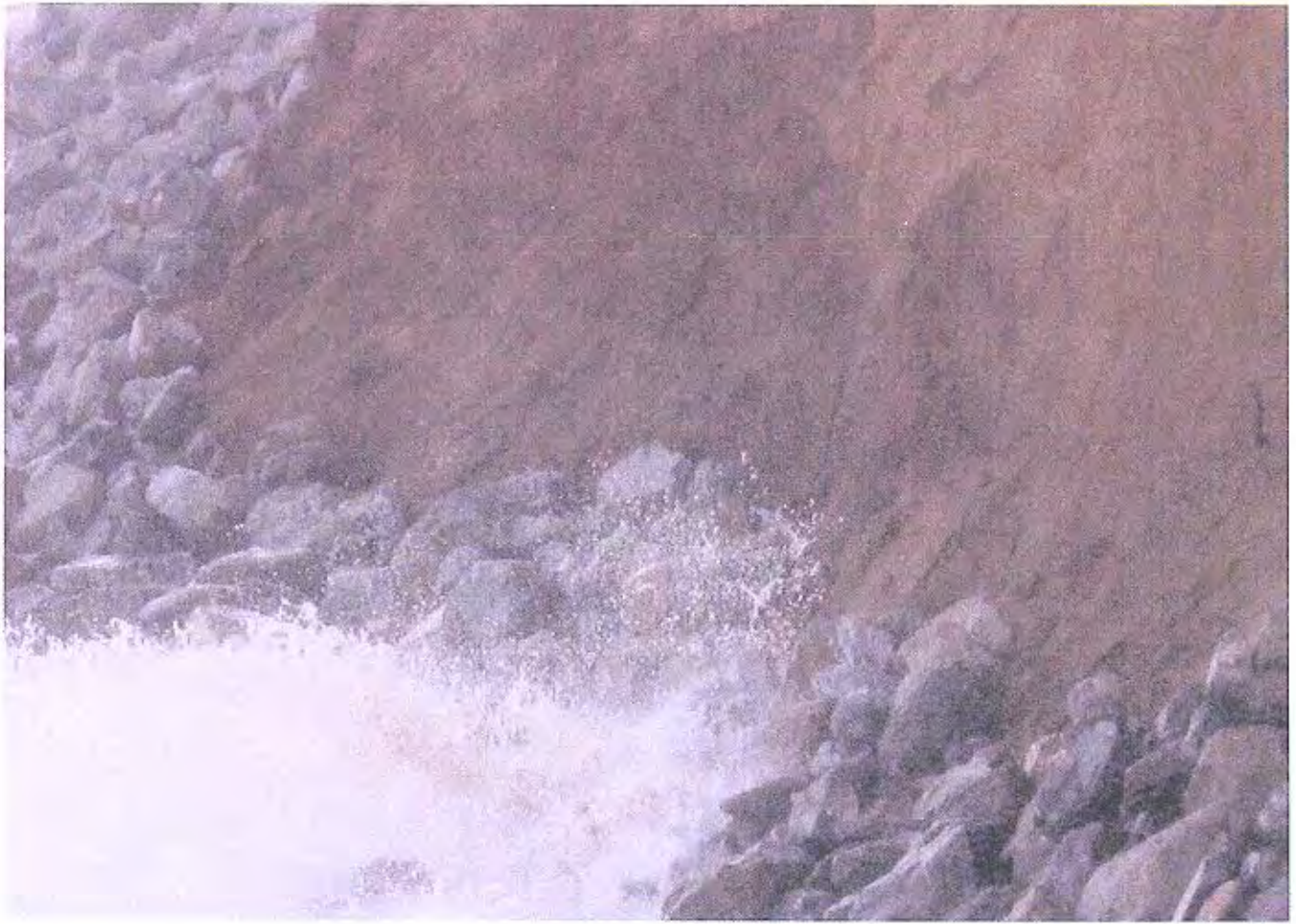
Can you confirm receipt of the documents sent yesterday via email. Comment letter plus exhibits. Also, the pdf file uploaded months ago on the Aimco revetment was delivered to the General Public Folder. Can you confirm that the Commission has this pdf file?

Also, according to the USPO the package is out for delivery. You should have in the morning mail that is delivered to the Commission Office in SF.

Regards,
Bart Willoughby
415.238.8837 Cell



2010/08/14
08:16:59



320

7



320

ANN RANKIN
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OF COUNSEL

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FAX: (510) 653-8889

F9a

TOLL FREE
TEL: (800) 354-4529

RECEIVED

OCT 04 2011

CALIFORNIA
COASTAL COMMISSION

September 30, 2011

VIA FEDERAL EXPRESS

Mr. Nick Dreher
California Coastal Commission
45 Fremont Street, Suite 2000
San Francisco, CA 94105-2219

**Re: Hearing on Friday, October 7, 2011
Application No. 2-08-020 (AIMCO, Esplanade Ave. Apartments LLC)**

Dear Mr. Dreher:

This firm represents the Pacific View Villas Homeowners' Association, located at 200-224 Palmetto Ave., Pacifica, CA.

The Association is concerned about the referenced Aimco application, because the revetment at 380 is currently blocking access to the north portion of Esplanade Beach. Pacific View Villas is located north of the revetment, and the owners of Pacific View Villas need to have access across the City of Pacifica Property and the Aimco property in order to make repairs, such as those that may be needed to Pacific View's sewer lines.

Currently, Pacific View Villas' lateral sewer line is located on the upper bluff and is only 27 feet away from the bluff edge at the border between Pacific View Villas' property and Land's End. If anything happened to the sewer line, the Pacific View Villas' owners would have to engage contractors to go across the Aimco revetment in order to effectuate repairs. Moreover, if the sewer lateral is threatened by soils instability, Pacific View Villas will have to install rip rap in the vicinity of the lateral line to try to protect it, and will need access across the Aimco revetment for that purpose.

The Pacific View Villas Homeowners' Association asks that the Commission impose, as a condition precedent to the approval of the Aimco application, that Aimco record an easement in the chain of title to its property, allowing Pacific View Villas Homeowners' Association an express easement across the Aimco property for the

purpose of accessing that property to make required repairs to the Pacific View Villas property. I will cooperate with Aimco counsel to draft the required easement. The easement should also be recorded in the chain of title to the properties at Pacific View Villas, which will be the dominant tenement.

Thank you in advance for your consideration of this request.

Very truly yours,

LAW OFFICES OF ANN RANKIN

Signature on File

Ann Rankin

Cc: Board
AR:gb

F9a

RICHARD W. LUND
RLUND@PLAGEMANLUND.COM

PLAGEMAN, LUND & CANNON LLP

ATTORNEYS AT LAW

155 GRAND AVENUE, SUITE 950 • OAKLAND, CA 94612
TEL 510/899-6100 • FAX 510/899-6101

October 4, 2011

Nicholas B. Dreher
California Coastal Commission
North Central Coast District Office
45 Fremont St, Suite 2000
San Francisco, CA 94105-2219

Re: Coastal Commission Hearing Oct. 7, 2011, 9:00am
Agenda Item F9a
Application 2-08-020
Our client: Dennis Thomas, 340 Esplanade, Pacifica, CA

Dear Mr. Dreher:

Our office represents Dennis Thomas, the owner of 340 Esplanade, Pacifica, California, one of the properties affected by the above referenced application filed by AIMCO, a neighboring property owner.

Mr. Thomas objects to the proposed removal of existing rock from the base of the coastal bluff below his property on the grounds that (i) insufficient technical information has been provided to demonstrate that such action is safe and does not pose an imminent health and safety threat to the residential properties above the bluff, including 340 Esplanade, and (ii) the attached initial evaluation by our own engineer indicates that the proposed action does in fact pose a threat to the stability of the bluff and the residential properties above.

We request that the Commission either deny the proposal to remove the existing rock, or continue the hearing until additional engineering analysis has been submitted to sufficiently evaluate the safety of the proposed action.

The report of Robert W. Anderson, RJR Engineering Group, dated October 3, 2011, is attached in support of this comment letter, for your consideration. Thank you for your attention to our concerns.

Sincerely,

Signature on File

Richard W. Lund
Attorney for Dennis Thomas



F9a

Civil Engineering
Land Planning
Hydrology/ Flood Control
Geotechnical Engineering
Public Works Services
Storm Water Management

October 3, 2011
P.N. 1609.60

MR. DENNIS THOMAS
1777 Borel Place #330
San Mateo, CA 94402

{via email to Richard Lund}

Subject: **REVIEW OF AIMCO PROPOSAL FOR RIP RAP REMOVAL
340 ESPLANADE WAY
CITY OF PACIFICA, CALIFORNIA**

Dear Mr. Thompson:

RJR Engineering Group (RJR) has prepared this letter in response to your request to review the Aimco (360 & 380 Esplanade proposal to remove rip rap from the existing revetment.

RJR has reviewed the California Coastal Commission staff report as well as the letter sent by Sedgwick LLP, dated September 28, 2011. We understand that Aimco has proposed to remove rock from the existing revetment which would reduce the structural section and overall height of the revetment.

RJR has performed preliminary studies of the bluff located at 340 Esplanade at your request. As part of previous studies for 100 Esplanade (Land's End), Dollar Radio, Pacific View Villa; and 320 and 330 Esplanade, RJR performed, but not limited to, the following tasks:

- Detailed beach survey between 2009 to the present including offshore measurements (summer 2009) collected off a boat with GPS;
- Geologic and geotechnical mapping of the exposed face;
- Slope stability analysis for the various bluff conditions;
- Shear strength tests on over 80 samples to determined strengths;
- Grain size analysis on over 115 bluff and beach samples; and,
- Performed detailed wave uprush and geotechnical reports for the various properties.

Based on this information, there have been two conclusions that we have determined:

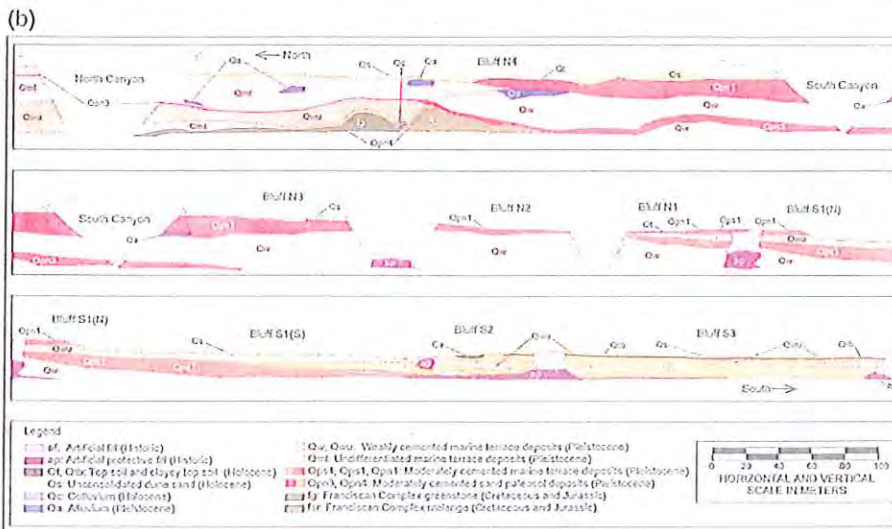
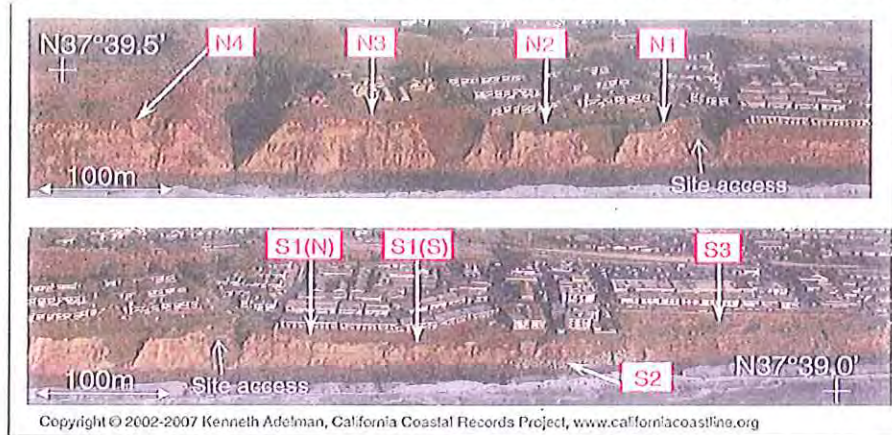


First, while the genesis of the alluvial deposits that compose the bluff may change (Figure 1), the textural and engineering properties and indices remaining essentially identical for the stretch extending from Dollar Radio to the south past Aimco. The only observable variations have been related to the cementation and corresponding shear strengths.

Second, the beach profiles, slopes, sediment grain size distribution, and characteristics are essentially identical.

As a result of the similar geotechnical properties, the basic engineering design approach and principles remain essentially identical across the bluff in this area. This is supported by the USGS studies performed by Brian Collins and other researchers, which are referenced in the underlying reports presented in the Reference section of this letter.

Figure 1 – Collins and Sitar, 2008 – Profile of Bluff Geology and Labels





Further, the beach slope, geographic location, and orientation are the same as the surrounding properties, and therefore, the coastal processes and analysis are also identical to the adjacent properties.

As a result, RJR has derived the following preliminary opinions, absent any site specific analysis or supporting data by Aimco to indicate a contravening opinion:

1. Removal of the rip rap stone will remove lateral adjacent support (reduces buttressing) and reduces the overall stability of the bluff adjacent to 340 Esplanade. This will further reduce the bluff factor of safety and accelerate bluff instability and threaten the existing structures.
2. The coastal analysis for Land's End calculated present day wave runup elevations in excess of Elevation +20, with long-term design Elevation of +27 when considering various factors including long-term sea level rise (RJR, 2011). Reducing the revetment height increases the overtopping which will further erode and destabilize the bluff. Given the proposed low height, the revetment will be overtopped in lower frequency events which increase the potential instability of the bluff.

We are inferring from the staff report that the overriding purpose for this recommendation is to remove rock from the beach and increase lateral access. It should be noted that the additional 2 to 4 feet will likely not occur as a result of local scour attributed to the revetment, decreased sand supplied, as well as, long term sea level rise.

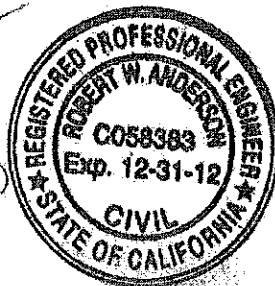
In summary, it is the opinion of RJR that the removal of the stones from the existing revetment could be a substantial factor in future bluff instability and subsequent risk to the existing structures. The Aimco request has been provided at the last minute with no supporting technical data and analysis to substantiate the basis for the request. We recommend that you request the necessary data from Aimco to support the basis for the rock removal. In the absence of this data, we cannot recommend that such action be taken, because at least on the face the proposal would not be prudent.

If you have any questions, please do not hesitate to call at 805.485.3935.

RJR ENGINEERING GROUP

Signature on File

[Handwritten Signature]
 Robert W. Anderson, NSPE, RCE, GC, JD
 Principal Civil Engineer - RCE 58383 (CA)
 Arizona: RCE 51923 Washington PE 47559
 Colorado PE 44734 Hawaii RCE 14230
 Oregon RCE 84690





REFERENCES

100 Palmetto Drive

1. "Addendum #1, Emergency Repair Application, Dollar Radio, Proposed Bluff Stabilization, 100 Palmetto Avenue, City of Pacifica, California"; prepared by RJR Engineering Group; dated August 30, 2011
2. "Emergency Repair Application, Dollar Radio, Proposed Bluff Stabilization, 100 Palmetto Avenue, City of Pacifica, California"; prepared by RJR Engineering Group; dated July 19, 2011
3. County of San Mateo Assessor – County Clerk – Recorder; Declaration of Historic Landmark, dated May 13, 2010
4. City of Pacifica, Agenda Memo, dated February 16, 2010.
5. City of Pacifica Emergency (Local) Coastal Development Plan, dated February 10, 2010.
6. "Temporary Stitch Pier, Retaining Structure, Levin Property, 100 Palmetto Dune Lane, Pacifica, California"; Prepared by ESR, Inc., dated February 1, 2010.
7. Levin Residence Temporary Stitch Pier Calculations, Prepared by ESR, Inc., dated January 25, 2010
8. Levin Residence Temporary Stitch Pier Plans, Prepared by ESR, Inc., dated January 25, 2010
9. "Rock Rip-Rap Winterization"; Prepared by ESR, Inc., dated December 7, 2009.

100 Esplanade Drive

1. "Addendum #2 – Sand Mitigation Assessment, Response to California Coastal Commission Review, Coastal Development Permit Application, Proposed Bluff Stabilization, Lands End Multi-Family Development, 100 Esplanade Way (APN 009-023-070), City Of Pacifica, California"; prepared by RJR Engineering Group; Dated May 24, 2011.
2. "Response to California Coastal Commission Review, Coastal Development Permit Application, Proposed Bluff Stabilization, Lands End Multi-Family Development, 100 Esplanade Way (APN 009-023-070), City of Pacifica, California"; prepared by RJR Engineering Group; Dated April 8, 2011.



3. Sea Wall and Bluff Stabilization Plans; Prepared by RJR Engineering Group, updated April, 2011
4. California Coastal Commission, Emergency Permit, Permit 2-10-007-G, dated February 16, 2010
5. “*Emergency Repair Application, Proposed Bluff Stabilization, Lands End Multi-Family Development, 100 Esplanade Way (APN 009-023-070), City Of Pacifica, California*”; prepared by RJR Engineering Group; Dated January 5, 2011.
6. “*Seawall and Public Access Engineering Plans – Coastal, Civil and Structural Sheets*”, Prepared by RJR Engineering Group, updated January 5, 2011
7. California Coastal Commission, Review of CDP Application 2-10-039, dated December 14, 2010
8. “*Geotechnical Feasibility Supplemental Letter #1, Emergency Repair Application, Lower Bluff and Public Access Stabilization, Lands End Multi-Family Development, 100 Esplanade Way, Pacifica, California*”; Prepared by RJR Engineering Group; Dated December 10, 2010.
9. “*Emergency Repair Application, Lower Bluff Stabilization, Lands End Multi-Family Development, 100 Esplanade Way (APN 009-023-070), City Of Pacifica, California*”; prepared by RJR Engineering Group; Dated November 20, 2010.
10. “*Coastal Development Permit Application, Sea Wall and Public Access, Lands End Multi-Family Development, 100 Esplanade Way (APN 009-023-070), City of Pacifica, California*”; prepared by RJR Engineering Group; Dated November 10, 2010.
11. “*Emergency Repair Application, Upper Bluff Stabilization, Lands End Multi-Family Development, 100 Esplanade Way (APN 009-023-070), City of Pacifica, California*”; prepared by RJR Engineering Group; Dated August 4, 2010.
12. “*Emergency Permit 2-10-007-G, Public Access Emergency Repair CDP, Lands End Multi-Family Development, 100 Esplanade Way (APN 009-023-070), City of Pacifica, California*”; prepared by RJR Engineering Group; Dated June 23, 2010.
13. “*Emergency Repair Application, Sewer and Storm Drain Pipe Relocation Plan, Lands End Multi-Family Development, Proposed Bluff Stabilization, 100 Esplanade Way, (APN 009-023-070, City of Pacifica, California*”; prepared by RJR Engineering Group; Dated June 10, 2010.



14. “*Emergency Repair Application, Public Access Emergency Repair CDP, Lands End Multi-Family Development, Proposed Bluff Stabilization, 100 Esplanade Way, (APN 009-023-070, City of Pacifica, California*”; prepared by RJR Engineering Group; Dated May 10, 2010.
15. “*Emergency Permit 2-10-007-G, Public Access Emergency Repair CDP – Time Extension, Lands End Multi-Family Development, 100 Esplanade Way (APN 009-023-070), City Of Pacifica, California*”; prepared by RJR Engineering Group; Dated April 5, 2010.
16. “*Emergency Repair Application, Sewer and Stormdrain Pipe Relocation Plan, Lands End Multi-Family Development, Proposed Bluff Stabilization, 100 Esplanade Way, (APN 009-023-070, City of Pacifica, California*”; prepared by RJR Engineering Group; Dated January 31, 2010.
17. “*Analysis of Public Access, Lands End Multi-Family Development, Proposed Bluff Stabilization, 100 Esplanade Way, City Of Pacifica, California*”; Prepared by RJR Engineering Group; Dated January 31, 2010.
18. “*Emergency Repair CDP Application, Lands End Multi-Family Development, Proposed Bluff Stabilization, 100 Esplanade Way, City Of Pacifica, California*”; Prepared by RJR Engineering Group; Dated January 31, 2010.
19. “*Geotechnical Feasibility Study and Analysis, Proposed Bluff Stabilization For Public Assess, Lands End Multi-Family Development, 100 Esplanade Way, Pacifica, California*”; Prepared by RJR Engineering Group; Dated October 26, 2009.
20. “*Proposed Bluff Stabilization for Public Assess, Alternative Engineering Analysis for Bluff Stabilization, Lands End Multi-Family Development, 100 Esplanade Way, Pacifica, California*”; Prepared by RJR Engineering Group; Dated October 26, 2009.
21. “*Geotechnical Engineering Analysis, Bluff Stabilization – Staircase, Lands End Multi-Family Development, 100 Esplanade Way, Pacifica, California*”; Prepared by RJR Engineering Group; Dated March 24, 2009

330 & 320 Esplanade Avenue

1. “*Response to City Letter, dated April 21, 2010, Apartment Building Stability, 320 Esplanade Way, City of Pacifica, California*”; Prepared by RJR Engineering Group, dated April 25, 2010
2. City of Pacifica Letter from Doug Rider; dated April 21, 2010.
3. City of Pacifica Letter from Doug Rider; dated April 1, 2010.



4. Field Memorandum, Prepared by Construction Materials Testing, Inc.; dated February 8, 2010.
5. “*Geotechnical Peer Review, Emergency Soil Nail and Shotcrete Design Measures, 330 Esplanade Avenue, Pacifica, California*”; Prepared by Cotton, Shires and Associates, Inc.; dated January 25, 2010.
6. “*Emergency Soil Nail/Shotcrete Emergency Bluff Repair, 330 Esplanade Avenue, Pacifica, California*”; Prepared by Alan Kropp & Associates; dated January 19, 2010.
7. “*Soil Nail and Shotcrete Emergency Bluff Repair, 330 Esplanade Avenue, Pacifica, California*”; Prepared by ESR Engineered Soil Repairs, Inc.; dated January 19, 2010.
8. “*Soil Nail and Shotcrete Emergency Bluff Repair, 330 Esplanade Avenue, Pacifica, California*”; Prepared by ESR Engineered Soil Repairs, Inc.; dated January 18, 2010.
9. “*Recommendations for Geotechnical Risk Evaluation, Apartment Buildings at 310, 320, 330, and 340 Esplanade Avenue, Pacifica, California*”; Prepared by Cotton, Shires and Associates, Inc.; dated January 18, 2010.