

CALIFORNIA COASTAL COMMISSION

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



May 1, 2020

City of Daly City
Planning Division
Attn: Carmelisa Morales, Associate Planner
333 90th Street
Daly City, CA 94015

Subject: GPA-9-19-14218, Olympic Way Retreat Center, located at 2152 Skyline Boulevard, APNs 002-011-060, -120, -130.

Dear Ms. Morales:

Thank you for the opportunity to comment on the resubmitted application to construct a new two-story retreat center with a maximum height of 30'-4" and 48,650 square feet of gross floor area/24,465 square feet of net floor area to include guest rooms, dining and multi-purpose rooms, classrooms, meeting rooms, balcony, walkway, and outdoor deck space at 2152 Skyline Boulevard in Daly City. Commission staff has the following comments on the application to the City at this time:

1. Project Description. As requested in the comment letter dated October 9, 2019, please require an acknowledgement in the submittal that a Local Coastal Plan (LCP) Amendment is required in order to modify the existing LCP standards for height limits and number of building stories prior to issuance of a CDP, as the applicant's proposal would be inconsistent with the current certified LCP allowances.
2. Visual Simulations. As requested previously, please require the visual simulations provided be supplemented with visual simulations from the elevation of the trails adjacent to and below the site as well as from the elevation of the beach.
3. Public Access Plan & Signage. Please require the applicant to clarify whether the "existing pedestrian access" paths will be maintained as part of the public access pathways for this project. In addition, the City should require that directional signage be added adjacent to or near the public parking areas to direct people to the trailheads. Alternative options for public access should also be developed for the project so as to ensure consistency with LCP policies regarding coastal access, while simultaneously ensuring public safety and adhering to requirements and recommendations outlined by CA State Parks.
4. Geologic Hazards. The geologic hazards at this site appear to be extreme, and it isn't clear that the currently proposed 200-foot setback will be adequate. Both of the geologic feasibility studies (Cotton Shires & ENGE0) identify the need for a comprehensive geologic/geotechnical study of the site. In particular, the ENGE0 (dated February 12, 2019) report identifies the need for a subsurface investigation

to better understand the local geology and the potential for future landslides. Commission staff fully supports the following ENGEO recommendations, and suggests the City require the applicant to perform an investigation of the following:

“A supplemental geotechnical exploration for the proposed development would be focused on collecting data that would allow better characterization of subsurface conditions including:

- Depth to groundwater and/or saturated zones within the bedrock across the site.
- Borings to explore subsurface stratigraphy, and inclination and dip direction of layers within the Colma and Merced formations.
- Surface trench excavation to examine the near-subsurface soils for evidence of previous ground cracking or fissures that could be evidence of past bluff extension and tension cracking.
- Collection of representative samples of bedrock materials for laboratory testing such as measurement of shear strength, grain size, plasticity, and unit weight.
- Construction of geologic cross sections based on subsurface investigations.
- Supplemental slope stability analyses based on the cross sections to evaluate static and seismic slope stability and to estimate potential slope deformations recommended in State guidelines described in the California Geological Survey Special Publication SP117A.

We anticipate that a supplemental exploration would include at least two 300-foot-long exploratory trenches extending from the top of the bluff, and a number of continuous-core borings extending to depths of approximately 200 to 300 feet below ground surface. Selected deep-core borings would be logged with a downhole televiewer camera system to measure in-situ bedding and joint inclinations. In addition to these explorations, we anticipate that additional shallow borings will be required for the design of building foundations and improvements, based on a detailed development plan.”

In addition to these ENGEO recommendations, Commission staff recommends the City also require the applicant to report on the following:

- Subsurface and Geotechnical Investigations. Key objectives of the subsurface and geotechnical investigations should be to accurately characterize the structure and slide geometry of the Thornton Beach Landslide, and to identify geologic features (e.g. weak layers, bedding attitudes, joints/fractures) that could contribute to further failures in the intact bluff, in order to reliably evaluate the present stability of the site and potential for future headward progression of the landslide. Notably, the primary slip surfaces inferred/assumed in the Cotton Shires and ENGEO studies were somewhat different, highlighting the need for further characterization.
- Slope Stability Analysis.

- A supplemental slope stability analysis should consider full site cross-sections, from the shoreline to inland of the subject property, to evaluate the global stability of the site, and should also include localized analyses of both the upper and lower bluff. The stability of the lower bluff is an important consideration to the extent that it is buttressing the toe of the Thornton Beach Landslide.
- The slope stability analysis should consider both present-day conditions and a future condition in which the buttressing effect of the lower bluff has been reduced by foreseeable, on-going bluff erosion and instability at this site.
- The site appears to be at a considerable risk for seismically-induced landslides. The slope stability analysis should include seismic conditions with strong ground-shaking that could result from large earthquakes on nearby faults (i.e., San Andreas, San Gregorio).
- The slope stability analysis should include wet-season conditions when upper bluff soils are likely to be saturated and groundwater levels are highest.
- Bluff Retreat Rates.
 - The preliminary geologic studies provided estimates of historical bluff retreat in the lower bluff seaward of the project site. This should be supplemented by an analysis of potential bluff retreat under future sea level rise conditions, over the life of the proposed project. The analysis should estimate the amount of buttress loss that could result in reactivation of the large landslide. Then the analysis should determine whether this amount of buttress loss could plausibly occur due to lower bluff instability and erosion under a range of sea level rise scenarios, but focusing on highest estimates.
 - Shoreline data should be viewed carefully for this site to evaluate future retreat and how toe erosion will cause the beach and shoreline to advance seaward. The long-term bluff edge retreat rate of the upper bluff should be estimated based on available information (e.g. aerial photographs).
 - LiDAR data for the bluff face or Adam Young's bluff surveys for this site may be helpful in estimating the volume changes in the slide mass.¹
 - The retreat rate considerations for this project would benefit from a decade-by-decade analysis to understand the expected frequency of destabilizing erosion events over the anticipated life of the proposed development, so any analysis of the safety of the proposed development from erosion should include these considerations.
- Geotechnical Investigation. The geotechnical investigation should fully evaluate the site for other seismic hazards (i.e., ground-shaking, liquefaction, lateral spreading, etc.) per state guidelines.

¹ Young, Adam (2018) Decadal-scale coastal cliff retreat in southern and central California, *Geomorphology*, Vol 300, pgs. 164-175. <https://doi.org/10.1016/j.geomorph.2017.10.010>.
<https://www.sciencedirect.com/science/article/abs/pii/S0169555X17304476>

5. Biological Resource Assessment. In general, it is important to note that California Department of Fish and Wildlife (CDFW) models this site as an area with significant value on multiple metrics including plant biodiversity, irreplaceability, elevated numbers of rare species, etc. In addition, while the site appears to be representative of bluff terrace, the area to the northwest at the stables is mapped as dune sands, and the site is within an area in which perched dunes have the potential to occur. In addition, the following specific considerations should be taken into account in an updated habitat assessment:
- San Francisco Bay Spineflower. The Biological Resource Assessment (BRA) seems to ignore or prematurely dismiss records of San Francisco Bay Spineflower (*Chorizanthe cuspidate* var. *cuspidata*). The species is evident in Figure 3, with the record directly adjacent to the parcels of interest, and is also clear to the north of this figure with 5 additional records shoreward of and surrounding Lake Merced as well as on the northern and southern ends of the map. For example, in the record directly adjacent to the site, there are reports from 1963 and 2009, demonstrating that spineflower can likely occur on-site. The City should require an assessment of presence of spineflower and appropriate avoidance, minimization and mitigation measures for any impacts to it on-site.
 - Plant Surveys. A survey in late November is not considered sufficient for detecting and accurately documenting vegetation that can be difficult to identify or observe outside of the bloom season, which is generally spring/summer. There are multiple species that could feasibly occur on this site. Given the proximity of records, the City should require the applicant conduct protocol-level surveys for spineflower, which has a bloom season of April through July.
 - Cut-Leaf Plantain. The report addresses the presence of cut-leaf plantain, a facultative plant species with 50/50 association with wetlands, but dismisses it based on a lack of hydrology and hydric soils. Details on how this was evaluated and documented should be provided (i.e. soil samples, delineation exercise, etc.) by the applicant as a part of the application to the City.
 - Poison Hemlock. The report mentions dense patches of poison hemlock, which in this area is considered to be a facultative wetland plant and would very likely be delineated as a wetland. The City should require a formal one-parameter wetland delineation to be conducted across the site, with a map indicating the expanse and specific location of this species on-site.
 - Wetland Resources. The report states that there are no wetlands within or adjacent to the project site. However, the presence of poison hemlock mentioned above indicates otherwise and the National Wetlands Inventory (USFWS) maps wetland resources down the bluff, within the zone of potential influence. In particular, to the west of the site and downhill there is a 0.81-acre freshwater emergent wetland and branched intermittent drainage of 1.38-acres (see enclosed National Wetlands Inventory map). In addition, the geotechnical report notes a spring below the site on the northern end. As

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such, there is concern about indirect impacts of the development on these wetland resources.

- Appendices. The City should require appendices be added to the BRA, to include:
 - i. An inventory of species observed on-site (both wildlife and vegetation, regardless of status), and
 - ii. A list of all potential special-status species, as determined from the California Natural Diversity Database (CNDDDB) search and any other relevant records, including a brief evaluation as to the likelihood of occurrence and supporting rationale (e.g. "No potential. Requires serpentine soils, which do not occur on-site.").
- Protective Measures for Nesting Birds. A minimum buffer of 300-ft from non-raptor species and 500-ft from raptors should be required by the City to assure protection of any nesting birds on or near the site.

Again, thank you for the opportunity to comment on this application. We look forward to continued coordination on the project. If you have any questions, please feel free to contact me at Julia.KoppmanNorton@coastal.ca.gov or (415) 904-5292.

Sincerely,



Julia Koppman Norton
Coastal Planner
North Central Coast District Office
California Coastal Commission

Cc: Sand Hill Property Company, LLC
California State Parks

Encl.: Commission comment letter dated October 9, 2019
National Wetlands Inventory map