

James Feenan - Re: Fwd: comments on CDP_2018-0011 (Williamstown Friendly Village)

From: James Feenan
To: James Feenan
Date: 10/20/2020 5:00 PM
Subject: Re: Fwd: comments on CDP_2018-0011 (Williamstown Friendly Village)

Mendocino County

OCT 20 2020

Planning & Building Services

The Coastal Commission staff offers the following comments on the subject permit:

1. We support inclusion of Special Conditions 11 and 15-16 as written.
2. We support inclusion of Special Condition 17 but recommend clarifying that separate CDP will be required for future removal or relocation of the residence and the residential stabilization structure.
3. We support the intent of Special Condition 20, which requires monitoring of the stabilization structure for damage, evidence of undermining, and visibility. However, the condition fails to include any specific actions to be taken should such required monitoring document any of those thresholds nor does it specify frequency of monitoring required, reporting requirements, or details on who should conduct the monitoring. We therefore recommend strengthening the condition to specify the required frequency of monitoring (e.g., every two years and after major events such as earthquakes, landslides, slope failures, major storm events, or other events that could adversely impact the future performance of the structure), who should conduct the monitoring (e.g., a qualified geologist or geotechnical engineer), reporting requirements (e.g., required submittal of monitoring reports to the County Planning Dept. by December 31st of each required monitoring year, so the County can verify that monitoring is taking place as required), and a timeline within which corrective actions should be proposed if the monitoring documents damage to the structure, evidence of undermining, or evidence of exposure/visibility of the structure (e.g., within 60 days of submittal of a monitoring report that identifies damage, evidence of undermining, exposure of the structure, etc., the permittee shall submit a report completed by a qualified professional with recommendations for appropriate actions to address the identified issues...). For example, monitoring may eventually document exposure of the upper bluff caissons, at which point erosion between caissons may be at risk of accelerating. If the condition is strengthened as suggested, within 60 days of documentation of the problem in the required monitoring report, the applicant would be required to submit an additional report by a qualified professional who has assessed the situation, developed recommendations for corrective actions, and submitted such recommendations to the County for consideration. It may be appropriate for the condition to make clear that any suggested corrective actions may require separate CDP authorization. We note that Special Condition 19 is related to monitoring triggers with respect to the issue of visibility and visual impacts from exposure of the structure. We support Special Condition 19 and its requirements but suggest it may make sense to tie it to the monitoring requirements of Special Condition 20. Consider combining the two conditions and expanding on them as suggested above.
4. We support the intent of Special Condition 12 to require additional analyses of the structure to assess its expected lifespan, stability, and performance over time, because the approval of the CDP

requires the County to make the findings that the new development (the stabilization structure) itself is assuredly stable and has structural integrity. The opinion of the Commission's geologist and engineer, who reviewed the submitted geologic evaluations and visited the site, was that there is a real possibility that the system could be undermined or damaged by on-going erosion and slope failures in the coming years/decades, specifically in the area at or below the base of the structure. In this situation, and in the event that the upper bluff caissons become exposed and erosion begins to occur between them, new structures may be needed, or, eventually, removal of the threatened part of the home may be needed. Also, visual impacts may begin to occur when the caissons are exposed, as referenced above and in the County's requirement that such impacts be mitigated (Special Condition 19). As currently written, however, Special Condition 12 does not require any further action upon submittal of the information required to be submitted by the condition. We therefore recommend strengthening the condition to require filing of a CDP or permit amendment within a specified time frame thereafter proposing measures or actions to implement recommendations developed from the required analyses and/or to propose removal of threatened development if the results of the analyses indicate that the structure cannot be found to assure stability and structural integrity.

Thank you for the opportunity to comment.

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