

CALIFORNIA COASTAL COMMISSION

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October 9, 2019

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 application to construct a new 29,200 sq. ft. two-story retreat center with a maximum height of 30'-4" to include guest rooms, dining and multi-purpose rooms, classrooms and meeting rooms, balcony, walkway, and outdoor deck space at 2152 Skyline Boulevard. Commission staff has the following comments at this time:

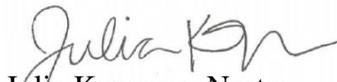
1. **Project Description.** Please clarify and correct the discrepancies in square footage and number of rooms between the project description on Sheet P-0001 of the plan set and in the Development Review Coordination Report. In addition, please clarify in the submittal that an LCP Amendment is required prior to issuance of a CDP to modify the existing LCP standards for height limits and number of building stories to align with what the applicant proposes for this project.
2. **Biological Assessment.** The LCP has the goals to *"Protect, maintain and, where possible, enhance existing plant and animal habitats to allow continued re-establishment of a variety of species,"* and to *"Protect existing...native vegetative groundcover on the bluffs to promote re-establishment of this natural slope stabilizer."* A biological assessment evaluating both plant and animal species on-site should be required and conducted for the site, including to determine whether Environmentally Sensitive Habitat Areas (ESHA), or other biological resources like wetlands, are present.
3. **Hazards Analysis.** The LCP notes there are a number of major physical hazards present along the bluffs that affect public safety as the result of erosion, landslides, and cliff retreat. Specifically, Goal 3 and Section 30253 of the LCP state that development of remaining vacant parcels along the blufftops shall be prohibited, unless geologic and seismic constraints and public safety requirements can be mitigated. Further, the LCP provides that new development shall be in the least hazardous location feasible. A geotechnical analysis of potential hazards should be required and conducted for the site, including assessment of bluff erosion and stability, both currently and in the presence of anticipated future sea level rise. In addition, the site should be assessed for

other hazards present such as the potential for sliding, slope failures, or liquefaction, given the site's hazardous location.

4. Bluff Setback Area. Clarify how the bluff setback was determined and the rationale for including development within that bluff setback area.
5. Traffic and Parking Study. The applicant should conduct and submit a traffic and parking analysis to determine the feasibility of the proposal on the site, and to assure that traffic associated with the proposal will not adversely impact traffic flow to surrounding development and public access areas.
6. Visual Simulations. The Daly City LCP provides that new development shall be designed to have the least visually obtrusive configuration feasible and for the structural mass to be compatible with the open space character. Additionally, the LCP refers to this property as a location where viewpoints of the coastline can be established. Perspective drawings are currently provided on P-0902 – P-0905. In order to evaluate the consistency of the proposal with the LCP's visual resource policies, please supplement these drawings with visual simulations from the trails adjacent to and below the site as well as from the beach.
7. Proposed Walkway. There are proposed walkways and paths facing outward towards the ocean. Daly City's Local Coastal Program (LCP) calls for the need to reserve and provide for coastal access and recreational uses within Daly City's coastal zone, stating that new development shall not interfere with the public's right to access the sea, and specifically calls out the need to maximize use of Thornton State Beach by protecting existing recreational uses and facilities. The Coastal Act also directs that public access shall be provided from the nearest roadway in new development projects subject to a few limited exceptions. The site currently serves the public who hike, ride horses, walk dogs, and generally view the coast through use of the volunteer trails that have been created in the area. In order to best align with Daly City's LCP public access policies, we recommend the walkway and paths be made publicly accessible. This should be explicitly noted in the plan and project submittal, and a plan for public access signage should be developed and proposed.

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