

TO: HearingOfficer@sandiego.gov  
Project name: 5386 CALUMET AVENUE  
Project number: 696586  
January 31, 2023

Please accept these comments regarding the application for a Coastal Development Permit and Site Development Permit for the stabilization of coastal bluff at 5386 Calumet Avenue.

- 1) The Applicant's Geotechnical report is not adequate and lacking required information. As given in §143.0143 "Development Regulations for Sensitive Coastal Bluffs", Section (f), the Applicant's Geotechnical report should include: " (B) An analysis of the potential effects on bluff stability of rising sea levels, using latest scientific information; (C) An analysis of the potential effects of past and projected El Nino events on bluff stability; " The Geotechnical report attached to the Report to the Hearing Officer (HO-23-002) does not include any discussion of the project in terms of forecasted Sea Level Rise, nor does it mention El Nino events as they pertain to bluff stability.
- 2) The proposed project was presented to the local Community planning group as repairing gunite that failed due to being placed on a substantial drainage gully that was improperly prepared for the original construction resulting in construction defects. Yet, the Geotechnical reports states that "Over the last approximately four years, the subject property has been adversely affected by winter storm waves, resulting in undermining and collapse of a protective gunite slope located at the southwest corner of the house, exposing underlying bluff and fill soils to erosion by waves." Additionally, the application packet does not include results from a drainage study that was presented to the LJCPA at Sep 1, 2022 meeting. The structure presented in the application drawings should be viewed as a seawall type erosion control structure, however as mentioned in 1), the geotechnical report does not have all of the proper components to warrant the construction of this erosion control structure.
- 3) The project is placed in a historically disturbed area, and the determination of the bluff edge is complicated by the existence of rubble fill and debris fill, which are shown to be supporting a portion of the residence. There is not any analysis of this fill in the geotechnical report, yet it seems from the project drawings that the erosion control structure will be built upon this fill. Furthermore, the geotechnical report states: "We have observed only a small portion of the pertinent soil and groundwater conditions at the proposed project site. The recommendations made herein are based on the assumption that soil conditions do not deviate appreciably from those found during our field investigation." Therefore, the applicant's project is based on a limited geotechnical reconnaissance which appears insufficient to address the stability and safety of the entire building. How are we to conclude that the engineering of the erosion control

structure and the Slope Stability Analysis are valid, given most of the bluff slope consists of fill materials that are not a part of the geotechnical report?

In addition to the above comments, it would be helpful for the applicant to formally declare the details of their debris removal work that is discussed throughout the application and the Report to the Hearing Officer. Over the many months since the field studies were done at this site, the debris from the failed gunite and exposed debris fill has been distributed along the beach, not solely placed directly in front of the applicant's property. We would expect the applicant to identify and remove all debris from the beach that came from the debris fill beneath the failed gunite, and believe the permit should formally contain the condition that debris removal is completed.

Finally, it is our recommendation that a condition be placed on this property that they will not be permitted an emergency permit for further erosion control issues at the site. A fair amount of uncertainty to the geologic makeup of this site has been uncovered in this application. Required portions of the geotechnical report dealing with wave runup, rising sea level, and El Nino have not been completed, and are necessary when discussing erosion control. Given the poor existing geology of the slope, and the relatively small size of the project, it is not out of the question that additional erosion may affect the area surrounding the erosion control structure. This should not be remedied with an emergency permit and should require a formal analysis.

Sincerely,

Tom Cook  
Surfrider Foundation  
San Diego Chapter  
Beach Preservation Committee