

WAYWARD LOT INVESTMENT COMPANY

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March 5, 2025

Via E-Mail (mgonzalez1@smcgov.org)

Zoning Hearing Officer
455 County Center
Room 101, First Floor
Redwood City, California 94111

Re: Regular Agenda Item #1
Owner: Seaside View LLC (Kenneth Huo)
File No.: PLN2019-00386

Dear Zoning Hearing Officer:

The Wayward Lot Investment Company ("WLIC") objects to the granting of a Coastal Development Permit (CDP) and Design Review Permit and to the Applicant's proposed use for their property, given its proximity to real property owned by WLIC. Specifically, WLIC owns a 0.13 acre parcel that is located directly between the Pacific Ocean and the applicant's parcel. Doubtless, the proposed Kayak Club will generate numerous daily trespasses by the Kayakers across the WLIC Property en route to the sandy beach and the Pacific Ocean. This will violate WLIC's property rights and may expose it to potential lawsuits, as explained below.

- The proposed Kayak Club will generate numerous trespasses against WLIC, since the WLIC parcel is located directly between the Applicant's property and the Sandy Princeton Beach and Pacific Ocean.**

WLIC owns a 5,663 square foot parcel that is located 70 feet to the south of the proposed Kayak Club, on the opposite side of the unimproved Ocean Boulevard (i.e., APN: 047-038-070). It is the WLIC property that adjoins the sandy Princeton Beach and the Pacific Ocean, not the Applicant's property. Unsurprisingly, the Subdivision Map for Princeton clearly shows that the "Sandy Beach" of the Pacific Ocean adjoins the WLIC property on its Southern Boundary, not the Applicant's (see: "Map of Princeton by the Sea, Half Moon Bay, San Mateo County, California," filed in the office of the San Mateo County Recorder on September 8, 1908 in Book 6 of Maps at Page 32). A copy of the pertinent portion of the Princeton Subdivision Map and the Assessor's Parcel map are attached hereto, and collectively marked "Exhibit A." Put another way, it is the WLIC Property that is South of the subject property, not the Princeton Beach, as stated in the Staff Report (at page 3, in ¶ 2).

It is beyond cavil that the members / guests of the Kayak Club will trespass against WLIC by dragging their numerous kayaks across WLIC's property in getting to the Sandy Beach and

Pacific Ocean. In fact, there is no direct access to the Pacific Ocean without crossing private property, since the developers of Princeton (ostensibly) envisioned developing the lands South of Ocean Boulevard property, which have been owned by private parties since 1908 (see: Lands of Frank P. Brophy and William H. George, as shown in Exhibit A).

Furthermore, the Trespassing Kayakers generated by the Applicant's proposed development will not be compatible with any conceivable development of WLIC's Property. Again, WLIC owns a 5,663 square foot parcel that is zoned W/DR/CD (Waterfront), which permits a variety of uses that take into account its unique location (including but not limited to: boat launching and docking facilities; marine research facilities; boat building repair; sales and support establishments; and Retail/Wholesale Marine Supply stores). As the property owner, WLIC has the absolute right to protect its property interests by excluding others from its property. Of course, the existence of private property south of Ocean Boulevard frustrates the purpose of the proposed Kayak Club, which - unlike the Half Moon Bay Yacht Club - does not own any of the Southern Portion of Ocean Blvd.

Finally, the scope of the proposed development will create dangers of lawsuits and may negatively impact the raw land that is the property of WLIC.

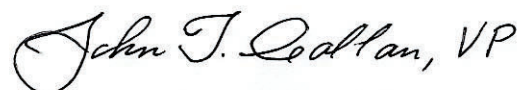
2. The proposed Kayak Club cannot be approved, since - unlike the Half Moon Bay Yacht Club - it lacks Shoreline Access (Policy 10.1 and 10.13).

Policy 10.1 and 10.13 require the establishment and improvement of vertical shoreline access as a condition for obtaining a permit for development along the shoreline. In this instance, the Applicant lacks Shoreline Access and simply can not comply with the stated Policies.

It simply does not make sense to permit the development of a Kayak Club that does not have legal access to the Pacific Ocean. For whatever reason, the project has progressed while ignoring the private property rights of those that have historically owned the land adjoining the Southern boundary of Ocean Boulevard.

For all of the foregoing reasons, WLIC requests that the Coastal Development Permit (CDP) and Design Review Permit are denied.

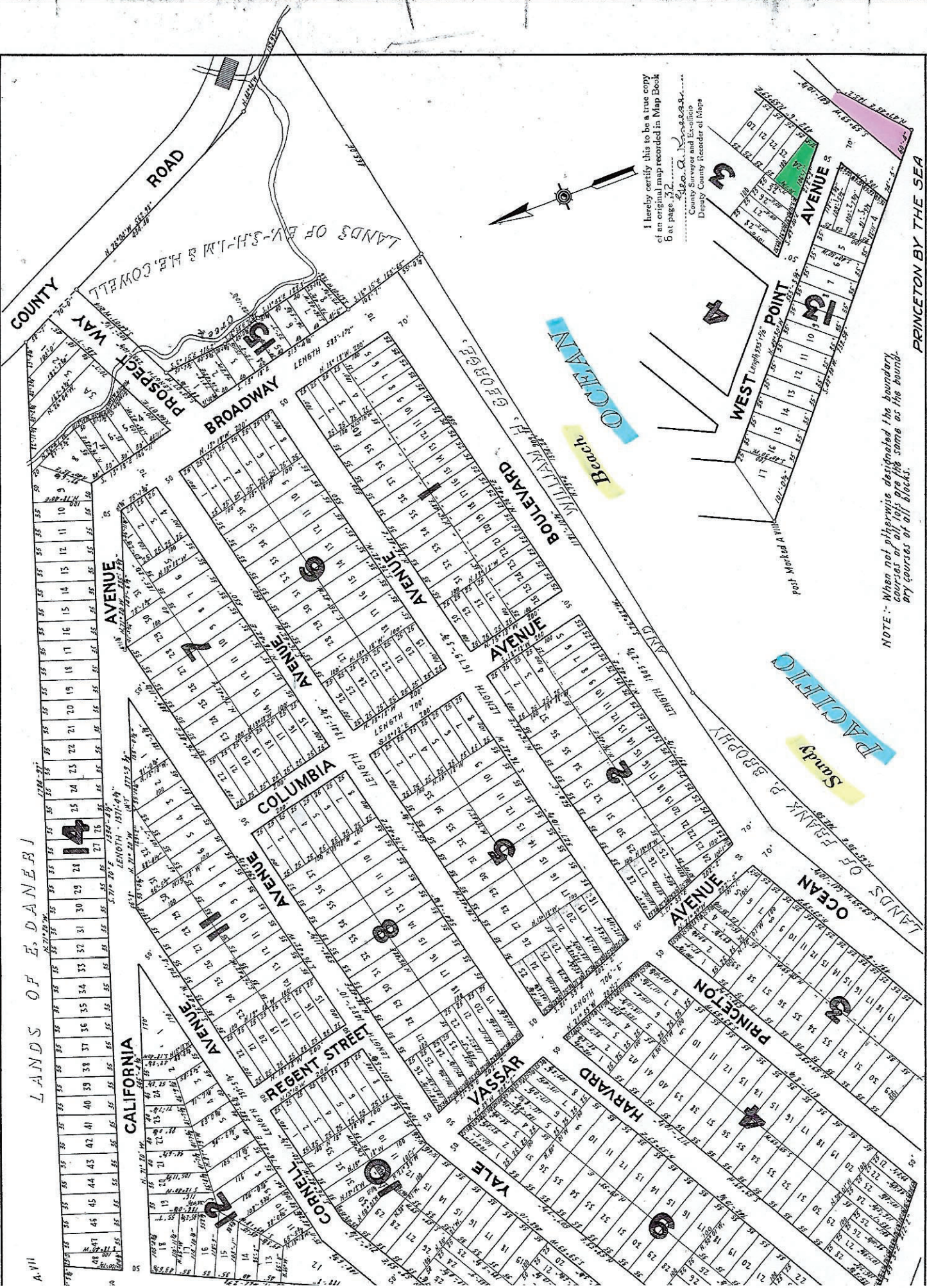
Very truly yours,
Wayward Lot Investment Company



John T. Callan, Vice-President

EXHIBIT A

32^b



I hereby certify this to be a true copy of an original map recorded in Map Book 6 at page 32.

Geo. O. Nease
County Surveyor and Ex-officio
Deputy County Recorder of Maps

PRINCETON BY THE SEA

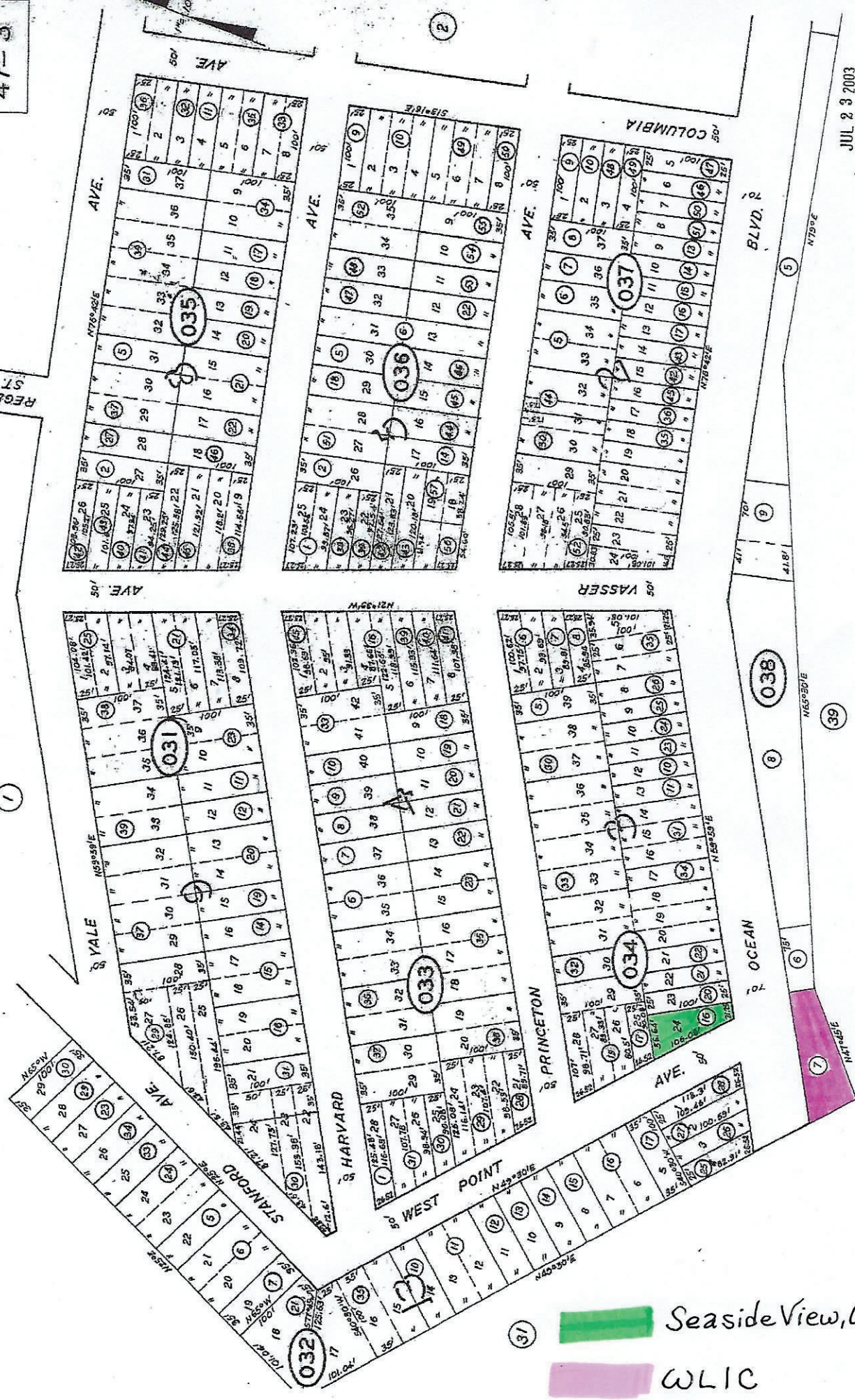
A.VII



47-3

REGENT ST

TAX CODE AREA

1



31  Seaside View, LLC
 WLIC

JUL 23 2003

PRINCETON BY THE SEA RSM 6/32

D.M. ASSESSOR'S MAP COUNTY OF SAN MATEO, CALIF.

2-28-83

From: jtcallan@aol.com
To: [Maria Gonzalez](#)
Subject: Comments from WLIC as to Regular Agenda Item #1 (Seaside View LLC)
Date: Wednesday, March 5, 2025 5:17:11 PM
Attachments: [Princeton.ZHO.let.03.05.2025.pdf](#)

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Ms. Tet Maria Gonzalez
Zoning Hearing Officer Secretary

Dear Ms. Gonzalez:

Attached are the Wayward Lot Investment Company's comments to Seaside View LLC's application, PLN2019-00386.

Please confirm your receipt of these comments. And thank you very much for your assistance in these matters.

Very truly yours,
John T. Callan (415) 847 6282
WAYWARD LOT INVESTMENT COMPANY