

From: jtcallan@aol.com
To: [Summer Burlison](#)
Cc: [Chris Callan](#); [Maria Gonzalez](#)
Subject: Re: Your Permit or Project File No.: PLN201900386 (Seaside View LLC / Kenneth Huo)
Date: Wednesday, April 16, 2025 11:21:24 AM

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Dear Summer:

I hope you're feeling better. I look forward to seeing you tomorrow.

I am very sorry to trouble you, but I am following-up on my voicemail message from yesterday, regarding Item #1 on the hearing set for tomorrow at 10:00 a.m. (Seaside View LLC - Princeton Kayak Club).

In the Staff Report, we do not find any reference to Wayward Lot Investment Company's objections to the Coastal Development Permit and/or the proposed development. I am at a loss to understand that omission, given that the Hearing was continued to evaluate Wayward Lot Investment Company's position / objections.

Simply put, did the County conclude that the so-called "Rancho Lands Exception" to the Public Trust Doctrine does not apply in this instance? If so, could you please elaborate the County's reasoning for us?

Also, it is extremely surprising that the County would approve the development of a Kayak Club that lacks legal access to the Pacific Ocean. Could you please explain what the County is thinking here?

Thank you very much for your attention to these matters.

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

On Friday, April 4, 2025 at 08:06:09 AM PDT, Summer Burlison <sburlison@smcgov.org> wrote:

Hello John,

Confirming I did receive this for staff's review.

Thank you,

Summer

Summer Burlison

Senior Planner

County of San Mateo

Planning & Building Department

455 County Center, 2nd Floor

Redwood City, CA 94063

(650) 363-1815

planning.smcgov.org

Please note that I am out of the office every other Friday.

From: jtcallan@aol.com <jtcallan@aol.com>

Sent: Wednesday, March 26, 2025 1:30 PM

To: Summer Burlison <sburlison@smcgov.org>

Cc: Chris Callan <chriscallan50@gmail.com>

Subject: Your Permit or Project File No.: PLN201900386 (Seaside View LLC / Kenneth Huo)

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Dear Summer:

I want to thank you for taking the time to review our objections to the above-referenced application on March 6, 2025. I recognize that our arguments may appear novel to the San Mateo Planning Department, but they are explained in detail in the memorandum we delivered to you at the hearing. Indeed, similar arguments were made in the Martins Beach litigation, which also involved a successor in interest to property that was conveyed by a Federal Patent pursuant to the California Land Act of March 3, 1851.

Please be advised, we painstakingly assembled the documents necessary to prepare that Memorandum, and reviewed the pertinent Federal Patent, the Act of March 3, 1851, the District Court Case of the United States v. Guerrero, etc. etc. If you would like us to provide you with copies of any of those documents, surveys, court proceedings, etc., we would be happy to do so.

Separately, please take note that Wayward Lot Investment Company filed a Civil Code Section 813 Notice for recordation with the San Mateo County Recorder on April 21, 1993, pertaining to its property (047-038-070). At that time, the Romeo Family was still operating its fertilizer business, and the area was not frequented by the public. Please see attached.

Under the circumstances, Wayward Lot Investment Company is firmly convinced that it holds fee title to that property and has the absolute right to exclude others.

Very truly yours,

John T. Callan

WAYWARD LOT INVESTMENT COMPANY