

Midcoast Community Council

An elected Advisory Council to the San Mateo County Board of Supervisors

representing Montara, Moss Beach, El Granada, Princeton, and Miramar

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Date: May 12, 2021

To: Steve Monowitz, Director, San Mateo County Planning Department
Gary Burke, Board President, Coastside Fire Protection District
JB Cockrell, Vice President, Coastside Fire Protection District
Bruce MacKimmie, Board Director, Coastside Fire Protection District
Steve Stockman, Board Director, Coastside Fire Protection District
Jonathan Cox, Deputy Chief, Coastside Fire Protection District
Summer Burlison, San Mateo County Planning Department
Don Horsley, San Mateo County Board of Supervisors, District 3

From: Midcoast Community Council

Subject: **Exterior lighting at El Granada Fire Station #41 (PLN2016-00346)**

The Midcoast Community Council (MCC) is an elected Municipal Advisory Council representing residents of the Midcoast including El Granada. The MCC addressed this issue at its January 27 meeting in response to community concerns that the exterior lighting at the new El Granada Fire Station #41 is excessive for the semi-rural location, with multiple 25-foot tall light poles that obstruct the view corridor towards the Pacific Ocean and degrade the darkened night skies, voting unanimously to send a [letter](#) to the San Mateo County Planning and Building Department and the Coastside Fire Protection District outlining how the lighting did not comply with various policies and regulations. Subsequent to that letter, a mitigation proposal was approved by Planning with no opportunity for the MCC or the public to review or comment.

The proposed adjustments included dimming the existing six 25-foot pole lights, dimming the five 10-foot walkway pole lights and lowering one of the six 25-foot pole lights to a height below the retaining wall. This is inadequate. These proposed adjustments do not address the core issues of the exterior lighting problem, specifically:

- The exterior lighting glare is excessive, with significant, direct ray trespass along all perimeter locations.
- The blue-rich white lights compound the problem of glare, making for an obtrusive character and compromising compatibility with the surroundings. This color of light is not consistent with the neighborhood street light color standard established and implemented in 2015. A typical lighting manufacturer only approves IDA Dark Sky lighting at 3000k or lower. IDA just

recently changed their position to 2200K. There are warm color light fixtures now available with high CRI values.

Language excerpted from the government documents referenced below all clearly show the project is not in compliance with respect to exterior lighting:

1. San Mateo County Planning Department's **Conditions of Approval** in its July 19, 2017, Letter of Decision, Finding 5, states, (emphasis added):

*All exterior lighting shall be designed and located so as to **confine direct rays to the subject property and prevent glare in the surrounding area** and shall be rated "Dark Sky" compliant. Manufacturer cut sheets for all proposed exterior lighting shall be reviewed and approved by the Planning Department during the building permit process to verify compliance with this condition. Installed exterior lighting shall be subject to inspection and approval by the Current Planning Section prior to final building inspection.*

2. The [Zoning Regulations](#) for the Fire Station property at 555 Obispo Road. This property is zoned as *El Granada Gateway District*. Section 6229.1 from the October 2020 document states, (emphasis added):

*The purpose of the "EG" District is to provide for low intensity development at the "Burnham Strip" in El Granada, which **preserves, to the greatest degree possible, the visual and open space characteristics** of this property.*

3. San Mateo County's [Local Coastal Program \(LCP\)](#), Section 8.18, parts a and c, state, (emphasis added):

*a. Require that development (1) blend with and be subordinate to the environment and the character of the area where located, and (2) **be as unobtrusive as possible and not detract from the natural, open space, or visual qualities of the area** including, but not limited to, siting, design, layout size, height, shape, materials, colors, access, and landscaping.*

*The colors of exterior materials all harmonize with the predominant earth and vegetative colors of the site. Materials and colors shall absorb light and minimize reflection. **Exterior lighting shall be limited to the minimum necessary for safety. All lighting, exterior and interior, must be placed, designed, and shielded so as to confine direct rays to the parcel where the lighting is located.***

4. The [Environmental Impact Report \(EIR\)](#), Section 3.4.1.3, December 2016, prepared by the Fire District as the Lead Agency, states, (emphasis added):

*The lighting needs at the project site would vary according to the type and intensity of use. Varying illumination levels shall be provided to address the particular needs of outdoor spaces and activities: safety, security, CFPD vehicle and pedestrian movement, signage, and an attractive nighttime environment. **Excessive illumination would be avoided and lighting would be shielded and placed so as to prevent glare and reflection or intrusion onto neighboring areas**, and to preserve sunsets, and will be Dark Sky compliant.*

***Lighting for paths, entranceways, and outdoor areas would be directed downward to maintain the natural character of the beach and reduce nuisance to adjacent properties.** The project's lighting would include recessed downlights with lenses, surfaced mounted wall sconces and skylights with glare-reducing devices employed to reduce glare at night. The lighting source would be of equal intensity to the existing nearby commercial buildings.*

A major concern and point of frustration with the current lighting design is that this issue was explicitly **identified as a Potentially Significant Impact** at the beginning of the process in 2015 as part of the CEQA-required *Initial Study Checklist*. And the issue was carefully tracked and addressed continually throughout the entire process, resulting in the strong language identified in the Conditions of Approval. Nonetheless, it was not implemented.

Regarding Safety

The Fire District has communicated that the current lighting arrangement exists as a matter of safety. To be sure, the MCC recognizes and values the importance of safety. However, we feel that adequate safety can be fully achieved without allowing direct light and glare to trespass off the property and without impacts to the protected view corridor.

In Planning's March 30, 2021, notification letter, laying out its proposed adjustments to the lighting, it was noted:

[T]he proposed lighting adjustments will best balance public concerns while maintaining compliance with industry accepted standard IESNA (Illuminated Engineering Society North America) recommendations which include provisions for lighting in special circumstances such as secure areas, first aid areas, and other areas deemed critical to the viability of the operation and safety of personnel.

However, in a recent communication from the President of the IES San Francisco chapter, he stated he had no knowledge of the standard quoted above in regards to fire station lighting. Furthermore, requests from MCC members and from the community to Planning for those source documents have gone unanswered. Remarkably, standards similar in design to the Fire Station lighting were found in the IESNA lighting handbook for high security detainment centers (https://openlibrary.org/books/OL58383M/The_IESNA_lighting_handbook).

In Planning's March 30, 2021, notification letter, it also states that "the color temperature of the lights was selected based on the need and ability to accurately distinguish colors on materials such as blood or other fluids." However, Fire Station #41 installed two, high intensity, exterior LED, flood lights on the engine bay for such inspections.

Conclusion

The external lighting plan for the Fire Station did not have a public design review. The Fire District installed lighting that was not compliant with their design goals, their plans, and not compliant with the zoning ordinance. No variance was requested. This is not in the spirit of the project permitting system or the CEQA process which identified this issue at the beginning of the process in 2015 in the CEQA-required Initial Study Checklist as a Potentially Significant Impact. Thus, we ask that everyone work together to find a solution that strictly satisfies the requirements of the Conditions of Approval, the Zoning Regulations, the LCP, and the EIR.

MIDCOAST COMMUNITY COUNCIL
s/Michelle Weil, Chair

Attachment: Slides