

COPY

CONCERNED CITIZENS OF THE COASTSIDE
301 SHELTER COVE DRIVE
HALF MOON BAY, CA 94019
October 13, 1989

Board of Supervisors
San Mateo County
Hall of Justice and Records
Redwood City, CA 94063

Dear Supervisor:

We, the Concerned Citizens of the Coastsides, offer the following supplemental information to our appeal of the Sept. 13 decision of the Planning Commission to approve the Pillar Point Fishing Village. Our position is that the project is illegal because it violates the Local Coastal Program (LCP), Coastsides Commercial Recreational (CCR) zoning regulations, and the California Environmental Quality Act (CEQA). A partial list of the specific sections violated is attached as Exhibit A.

While it is true that the Coast is our collective backyard, the elements that we find enjoyable—the views of the harbor, ocean and shoreline, along with the small town rural atmosphere, are precisely the elements enjoyed by countless visitors. A common love of beauty must be what the authors of the LCP, CCR zoning regulations and CEQA had in mind when they included the numerous clauses which protect the views and character of the San Mateo Coast. Our present goal is to seek a compromise in which the project is modified to conform to the aforementioned laws so that all people can continue to enjoy the coast.

VIEW BLOCKAGE

Both the Draft EIR (pp.3, 43-67, 107 and p. 9 of the environmental checklist) dated February 1989, and the Final EIR (p. 13 and under the visual quality section of "Mitigation Monitoring") dated June 1989 document that the project will significantly block the harbor view from the northern approach on Highway 1. This view blockage violates sections 8.12 and 11.4 of the LCP and section 6269 sub b of the CCR (see attached). The County planning staff and developer have argued that these sections are not really violated since visitors could still see the harbor from Capistrano Rd., a small side street that is already congested on sunny weekends. Highway 1 is designated scenic because views can be observed from the windows of a moving car. Asking visitors to pull off Highway 1 and sit in traffic if they wish to see the harbor is not "visitor serving." By this logic a huge hotel in front of Yosemite Falls would be permissible if only one hiking trail remained open to the public. The developer states that the view blockage caused by the Harbor Village project is mitigated by the fact "the lighthouse observation tower and the hotel and restaurant windows fronting Capistrano Rd. would provide excellent visual access to the harbor, marina and coast." This most assuredly would not be "free" access by any definition of the word and violates the most basic principles of the LCP and the California Coastal Act. Walling off the panoramic view from the northern approach is clearly a violation of the public good. Millions of people will lose that view so that a few people can enjoy it from the hotel complex.

SUBVERSION OF THE UNIQUE SMALL TOWN RURAL CHARACTER OF THE
COASTSIDE

Page 40 line 1 of the Draft EIR states "the project is of a much larger scale and intensity than existing uses in the area. The character of the area would be changed with the proposed project standing as the dominant land use." This is in direct violation of sections 8.5 and 11.4 of the LCP. A "grand hotel", huge restaurant, shopping mall complex covering an area equal to more than 6 football fields is not consistent with the character of a small rural town, nor does it have "an intimate, human scale". as specified in section 6266 of the CCR zoning regulations. Furthermore, the erection of a fake lighthouse will immediately label the area as a tourist trap, and no doubt when residents of Princeton or adjacent El Granada are asked where they live, they will reply: "by the big hotel with the fake lighthouse" rather than "by Pillar Point Harbor". This is a textbook example of a situation describing the word "subversion".

CEQA, CCR ZONING, DR, AND OTHER VIOLATIONS

Compatibility of the Project with the Princeton Master Plan

A major goal of the project itself and of the new Princeton Master Plan is to attract more visitors, boaters and fishermen to the harbor. The Pillar Point Harbor Village will result in a net loss of parking space available to users and visitors to the harbor. Although project plans do include 90 parking spaces to be set aside for harbor-only visitors, the entire site is currently used for overflow parking of vehicles towing boat trailers (each using 2-3 parking sites).

The height of the project will also not conform to the Princeton Master Plan which specifies a height limit of 36 feet from grade to peak of roof. The Harbor Village has been planned under a different standard which allows heights of 44-46 ft from grade to peak of roof.

Lack of adequate description of subdivision, especially Parcel D

In both the Draft and Final EIR there are many direct and implied references to further development on the land owned by Pillar Point Properties. Other than a discussion of changes in the size of Parcel D due to road addition and the placement of a sign on that parcel, there are no specifics given. This violates section 6267 sub C of CCR zoning regulations as well as CEQA which state that long range plans must be disclosed and discussed publicly at the time of subdivision. This lack of existing plans for future development is out of character for Westinghouse (parent company of the developer) and is also ironic in light of our recent experiences. When we first complained of inadequate notification of local residents concerning the Harbor Village project, the developer claimed that plans for the village had been on the books for many years. Companies like Westinghouse

develop long term strategic plans, and it would be most surprising if these plans did not exist for the balance of the Pillar Point property. These plans should now be made public so that the Harbor Village can be discussed in both present and future contexts.

Lack of EIR discussion of growth-promoting effects of the project

The EIR does not adequately describe the growth promoting-effects of the project. For instance, purchase of a 75 ft ladder truck for fire fighting encourages building of other oversize structures.

Lack of serious considerations of Project Alternative

The Visitor Serving Commercial Development Alternative described on page 102 of the Draft EIR and page 17-18 of the Sept. 13 Planning Department memo would result in a reduction in scale and if properly re-sited would greatly reduce the blockage of view. This alternative calls for elimination of the retail shops and the 11 resident apartments. The planning staff argued that elimination of the boutiques would result in a reduction of visitor services. This is nonsensical since anything a visitor would need to buy could be obtained in Half Moon Bay, and if they wanted to spend an afternoon shopping inside a mall rather than enjoying the beauty of the coast, Hillside is only 20 minutes away. Elimination of upscale boutiques in return for protecting the character and scenic beauty of the coast is a most desirable trade-off and would enhance rather than diminish the visitor's experience. CEQA requires that the County seriously consider all such alternatives, but the Planning Commission never publicly discussed our alternatives presented at its July 26 meeting. (See end of this letter for our compromise alternative).

INAPPROPRIATE AND MISLEADING STATEMENTS OF OVERRIDING
CONSIDERATION

One of the main arguments used in this resolution adopted on Sept. 13 is that the negative impacts of the project will be offset by its production of significant tax revenue. We feel that no county should unnecessarily diminish the quality of its resident's life in return for tax dollars from a facility which also lessens the enjoyment of visitors to the county. In short, the Coast is not for sale. Another statement in this resolution says that the development is consistent with Section 30001 (d) of the Coastal Act by promoting the economic and social well being of the people of the State and especially working persons employed within the Coastal Zone. The case for a positive economic effect may or may not be true, but the idea that the working man will have an increased sense of social well being is preposterous. In fact on page 10 of the environmental checklist (back of the Draft EIR) William Rozar, the County's Senior Planner, checked yes to the question "Would the project cause substantial adverse effects on human beings, either directly or indirectly?". One of these adverse effects, the project-caused increase of 283 cars per afternoon hr will not be appreciated by the working people who wish to enjoy their hometown on weekends, nor do these people support ruining the semi-rural character of the Coastside by turning

Highway 1 into a four-lane freeway as proposed by the Planning Department's traffic consultant. Moreover, one must ask how the social well being of the people will be promoted by the decrease in air quality and the increase in the response time of police, fire and ambulance units as a result of the project-added traffic.

The developer has recently added that community events such as a songfest or crafts fair may be held on their property. This hardly outweighs the loss of the open view of the harbor, bay and hills; the destruction of the semi-rural, small-town ambiance of Princeton; and the sudden and enormous increase in traffic on Highway 1, nor does it consider the fact that similar open-air events are currently held on the property.

OUR COMPROMISE ALTERNATIVE

Without conceding the legality of the current plan at this time, we would be willing to agree to a compromise derived from the "Visitor-Serving Commercial Development Alternative" stated in the Draft EIR. Our alternative allows Westinghouse to build a harbor-view hotel and restaurant complex; the County to gain tax revenue while upholding the LCP and other policies that charge County Government to preserve and protect coastal views, ambiance and open space; and the public, tourists and residents alike, to partake of the panoramic view and semi-rural, small town ambiance. We propose the following modification of the visitor serving commercial development alternative:

1. Scale down the project to consist of a two story hotel and restaurant, which in order to preserve the view corridor shall be re-sited to the westernmost portions of parcels B and C. The covered mall of upscale boutiques would be eliminated as would the phoney "lighthouse" tower. Placement and design of the remaining buildings should be such that the visitor serving function of adjacent businesses is not compromised.
2. Make the southern half of Parcel A (along Capistrano Road) a badly needed paved parking lot for cars and boat trailers to serve visitors to the harbor and new commercial developments planned for Princeton.
3. Designate Parcel D as permanent open space and wildlife habitat for the following reasons: a-The public strongly desires that you keep the view corridor open between the water and the southbound approach from Highway 1 to the harbor. Construction of retail agricultural buildings as proposed in the Princeton Master Plan would block this view. b-The Princeton Master Plan allows for dense development west of the Harbor Village site. Protection of Parcel D would balance this by providing the public with a buffer of scenic open space. c-By allowing no construction (either through an open space easement or requiring the developer to dedicate it to a public agency) on Parcel D, the increasingly rare open space habitat adjacent to Denniston creek would be saved from deterioration and the County would fulfill its obligation as stated in the introduction to the Visual Resources Component of the LCP.

We hope this letter puts our position in perspective. We welcome any attempt to ensure that the upcoming Board of Supervisors appeal hearing is as productive as possible. In this light we suggest a pre-hearing discussion between ourselves, the developer and the County. We also respectfully request that, since this project will have a major impact on the future of the Coast, the Board considers holding the appeal hearing during the evening on the Coast

Sincerely.

Larry M. De Young
Chairman, Concerned Citizens of the Coastside

Copies: Press, Thomas Grimm of Westinghouse, Citizen Groups

CONCERNED CITIZENS OF THE COASTSIDE

The following is a summary of some of the specific portions of the Local Coastal Program and CCR zoning regulations violated by the current design of the Pillar Point Fishing Village.

1. Section 1.18 Location of new development. a. "Direct new development to existing urban areas and rural service centers in order to ...(5) protect and enhance the natural environment."
2. Section 8.5 Structures. "Minimize the number of structures located in open fields and grassland areas; require that structures be designed in scale with the rural character of the region, and that they be clustered near existing natural or man-made vertical features."
3. Section 8.12 General Regulations. c. "Locate and design new development and landscaping so that ocean views are not blocked from public viewing points such as public roads and publicly-owned lands."
4. Section 11.4 Recreation and Visitor Serving Facilities Permitted in the Coastal Zone. "Permit the following facilities in the coastal zone: (1) necessary visitor serving facilities as defined in section 11.1...which (b) do not substantially alter the natural environment and (c) do not subvert the unique small town, rural character of the individual communities on the Coastside."
5. Section 12.3. Related uses. "The county will: Encourage developments or uses which directly support recreational boating or commercial fishing before all others within one-half mile of the Pillar Point Harbor area on lands designated on the Land Use Plan maps in Commercial Recreation or General Industry

In addition the Pillar Point Fishing Village Plan violates section 6269 section b of the Coastside Commercial Recreation District Zoning Regulations. This states:

"Development shall be located and designed so as to provide maximum feasible protection of coastal resources, including but not limited to, marine views, significant natural landforms... To achieve this objective, development must comply with the requirements of the Local Coastal Program Sensitive Habitats and Visual Resources Components. Appropriate restrictions, such as increased setbacks, reduced height limits and reduced lot coverage, may be imposed as conditions of use permit approval."