

## MidCoast Community Council

An elected Municipal Advisory Council to the San Mateo County Board of Supervisors  
*Serving 12,000 coastal residents*

<http://mcc.sanmateo>

E-mail: [mcc@lists.sanmateo.org](mailto:mcc@lists.sanmateo.org)

Office Fax: (650) 728-2129

March 14, 2006

Honorable Board of Supervisors  
San Mateo County  
400 County Center  
Redwood City, CA 94063

Dear President Hill and Supervisors Church, Gordon, Jacobs Gibson, and Tissier,

Re: Local Coastal Plan Update

MCC continues to support our previous recommendations for this LCP Update, however we offer the following comments and raise the following issues with respect to these new recommendations. The major problem is that there is little or no data in the staff report that explains or justifies them. One recommendation we have is that strong, specific numeric standards or language specifically defining the implementation of the policy should be used.

### **Task 3: Infrastructure Demand at Buildout**

MCC recommends amending the proposed language in the failed well policy. As written the policy would include only wells deemed failed due to "inadequate water supply." We suggest the Board of Supervisors amend the policy to allow priority for any well deemed to be unsuitable to support residential needs to qualify as a priority connection as is the past practice. The current phrasing could, in the future, be interpreted to mean "only an insufficient amount of water" not "water supply lacking in sufficient quantity or quality".

Coordination of transportation improvement projects should include members of the local community. MCC recommends changing the policy to read: (5) Coordinate with the City of Half Moon Bay, the Transportation Authority and Midcoast Community Council to propose projects that will improve roadway level of service at buildout... MCC recommends that the implementing policies include requirements for local meetings advertised on MCTV and in the newspapers

### **Task 4: Residential Growth Limit**

MCC recommends a one percent (1%) overall growth limit with no exceptions.

Seventy-five residential units is greater than the growth limit in Pacifica, in effect since 1982, or Half Moon Bay. Pacifica allows 70 residential units per year but is growing at a much slower rate: estimated to be less than 1/2%. Neither HMB nor Pacifica has any exceptions. The real rate anticipated by this LCP Update is unknown

because of the many exceptions to the 75 units/ year contained in the update. Using 125 units per year it is potentially at 3.37%. We do not have the traffic capacity to support the cumulative effects of even seventy-five new residential units a year nor is it demonstrated that the proposed traffic improvements in this update will fix the problem.

The annual exception for an additional fifty (50) residential units for the 'disabled and their caretakers' brings our allowed units per year back to 125. This new policy simply creates a new, special entitlement with no evidence of need while putting the Midcoast back to the 3.37% growth rate.

MCC strongly supports eliminating the provision authorizing an increase in the annual limit on residential units to 200 units per year.

**Task 5: Merge Residential Substandard Lots**

MCC strongly supports merger of substandard parcels to the zoning minimum parcel size.

We support reduction of fees for market rate projects and elimination of fees for single unit affordable housing projects. We support allocation of priority of water and sewer connections for affordable housing units.

MCC opposes the 'bonus floor area' incentive. It is unclear if the 250 sq. ft. bonus area will be in excess of the floor area ratio limits in the zoning standards. It will undermine the years long efforts of 2 separate committees to create unambiguous standards for our community. Potentially this will affect 20% of undeveloped lots and an unspecified number of developed lots creating confusion at both the Design Review Committee and the Planning Dept.

MCC opposes reducing on-site parking requirements. The Midcoast currently suffers from a shortage of parking creating safety and beach access problems. The problems currently are evident night and in areas near the beaches

**Task 6: Nonconforming Parcel Development Controls**

MCC recommends adopting the proportionality rule. It encourages merger without being unfair to folks who have followed the zoning ordinance

**Task 7: Nonconforming Uses in the C-1 District**

There must be a specific ratio of commercial to residential. The current trend new projects in Pacifica is for the commercial area to be a small percentage of new C-1 projects. If that were to happen on the Midcoast our jobs/housing imbalance would become even more lopsided in favor of housing. In this proposal first floor area may be used for parking possibly resulting in even greater differences between commercial and residential areas. Task 10 notes this area suffers from area a large (and growing) jobs/housing imbalance. MCC recommends the County should be planning for the long term by strongly encouraging appropriate commercial development. MCC recommends the County use the same standards for the Midcoast as are currently in effect for West Menlo Park (WMP).

In West Menlo park C-1: 6254.4

(7) Dwelling units shall be located above the first floor, and the floor area of the dwelling units shall not exceed the floor area of the ground floor."

MCC recommends limiting C-1 to two floors. 36 ft will accommodate up to four (4) floors. Twenty-eight (28) feet will accommodate 3 floors. Without specific requirements it is possible to have only a very small percentage of the project to be commercial. This will add substantial traffic and infrastructure planning problems to the coast. Further, there has been no discussion of parking requirements for these projects.

West Menlo Park C-1: 6254.4 (5) The maximum building height shall be two (2) stories not to exceed (30) feet....

MCC requests parcel sizes, set backs, coverage and FAR for C-1 that meet those for West Menlo park or North Fair Oaks (NFO)

WMP: lots size min 5,000 sq ft and 50' min width. The setbacks are 10' side and 20' rear for parcels abutting R zoning. The max. coverage is 70% and the max. FAR is 70%

NFO: : lots size min 5,000 sq ft and 50' min width.; setbacks are 10' (side)/20' rear for parcels abutting a residentially zoned parcel. Across the street from an R parcel they are 5' (side) and 20' (rear) In all cases when a C-1 parcel abuts a residentially zoned parcel the rear setback is 20'. Max. coverage is 80%; max FAR is 80%. Max height is 30'

MCC requests adoption of performance standards equal to or better than those currently in Section 6253.5 for NFO and WMP.

**Task 9: Residential Uses in the COSC District**

MCC finds this current proposal to be very complex and fears will lead to requests for variances and exceptions. Because of the importance of this area in the historic and nationally important Burnham Plan, MCC recommends removing housing as an allowed use and keeping current ordinances in effect.

**Task 10: Increasing Commercial and Employment Opportunities**

It is important to protect and encourage the existing uses – particularly ocean dependent activities and those supporting the fishing industry. Many of the proposed uses can happen in areas other than Princeton. A renewable use permit should be required for the new uses.

New enterprises in Princeton need to understand they are in an airport zone or very close proximity to an airport and subject to aviation noise and other airport related inconveniences. A specific disclosure statement should be included for any development proposal.

No rezoning should occur until a complete environmental assessment has been completed.

**Task 11: Development Controls in the AO District**

MCC recommends that no rezoning should occur until the Master Plan is completed.

The effects of changing the "displaced threshold" should be evaluated for all areas affected by the proposed change and should include all stakeholders. HMB

airport will be critical for getting aid to the Half Moon Bay Basin for any large scale emergency in the area. Nothing should be done which will limit airplane size.

**Task 12: Midcoast Traffic Mitigation Requirements**

The traffic problems in the Half Moon Bay Basin should be analyzed as a system instead of using the current piecemeal practice of suggesting 'fixes' one at a time. Without overall analysis of the connections between projects the County cannot demonstrate that regional traffic LOS will be improved by the proposed mitigation projects

It is MCC's understanding that the money in the mitigation fee fund will be used for much needed improvements to the County maintained drainage system.

MCC notes that growth cannot be based on un-enforceable requirements placed on a separate agency. We have had promises of expanded bus service to the Coast for decades. The expansion of the sewer plant in the late 1970's was found to be 'not growth inducing' by the statement that bus service would be expanded to the coast. While that may have happened in the past, SAMTRANS has just reduced service to the coast. The County cannot base future development based on a system it has no control of.

**Task 13: Development Controls in the RM-CZ and PAD Districts**

What incentives will be offered for the conservation easements? What will a conservation easement do to the ability of the property owner to use the land? How long would the easement last? As many questions exist MCC continues to support the Planning Commission recommendation as the best solution for the Midcoast RM-CZ and PAD districts.

**Task 14: Rural Residential Designation**

The lack of will on the part of the County to enforce the zoning minimums is a threat to coastal resources and public health and safety. It will result in increased traffic, demands on other infrastructure systems and degradation of coastal resources. The County has not calculated how much infill will happen under its present policies which allow a residence on parcels as small as 20% of the recommended parcel size. One RM-CZ zoned project, currently on track for approval in the Planning Dept., is on .75 acre instead of the 5 acres required in zoning. At this rate the development density is 500% greater than predicted in the LCP. The water source for this project is on a separate parcel with PAD zoning, its septic system is about 125 ft from the MWSD Drake Well. The County is not requiring protections to protect the public water supply from future nitrate pollution.

MCC urges the County to revisit Rural Residential Designation task and adopt the Planning Commission recommendations.

**Task 15. Lot Merger in Midcoast Rural Areas**

The 250 sq. ft. bonus meaningless as there is no max. FAR or house size in PAD or RM/CZ aside from that imposed by the zoning setbacks. Is the proposal to relax the zoning setbacks? MCC cannot recommend this bonus.

The streets in the RM-CZ and PAD are narrow and will not safely accommodate off street parking. The lots are intended to be several acres or more. MCC recommends adoption of specific ordinances for adequate on-site parking if this option is adopted.

**Task 16: Use of the CalTrans Devils Slide Bypass Property Use of the CalTrans Devils Slide Bypass Property**

MCC recommends adoption of the following policy additions for the bypass lands:

- 1) Designate the former right-of-way as a Linear Park and Trail;
- 2) Amend the zoning of the former right-of-way to implement the a Linear Park and Trail Designation;
- 3) Permit existing roads which cross the former right-of-way to remain;
- 4) Permit water supply source, distribution, and necessary access roads within the former right of way.

**Task 19: Impervious Surface Limit/Winter Grading**

MCC supports the prior approvals by the Board of Supervisors and supports the formation of a committee to find solutions to protect homes and coastal resources from future flooding and storm water pollution.

**Task 23: New Midcoast Affordable Housing Policy**

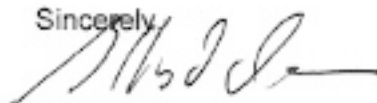
MCC supports encouraging a diversity of income levels on the coast through affordable housing efforts. These should not be at the expense of safety, community character or coastal resource protection.

In 2 previous policies the county is willing to forgive covered parking requirements while in this policy it is granting the opportunity for additional covered parking area while simultaneously forgiving 1 covered parking space.

Granada Sanitary District has determined that coastal resources are protected by eliminating potential causes of wet weather sewer overflows. It has made the determination that substandard lot development increases this risk. The MCC recommends that the County help protect coastal resources on the Midcoast from sewer overflows and other threats.

Finally, as part of the LCP Update process the County adopted an updated set of design review standards. It has become apparent that the language in those standards must be made more definitive for these standards to be of any use in enforcing the adopted community standards. As specific changes to the Design Review guidelines MCC recommends limiting houses in the urban area to two(2) stories in any cross section and eliminating the phrase "to the extent feasible" in the standards. Instead specific permission, in the form of a variance should to change any standard.

Sincerely,



Geoff Davis  
Chair, Midcoast Community Council