

CALIFORNIA COASTAL COMMISSION

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May 22, 2015

Summer Burlison
San Mateo County Planning and Building Department
455 County Center, 2nd Floor
Redwood City, CA 94063

Re: Plan Princeton, Preferred Plan and Policy Framework

Dear Ms. Burlison,

Thank you for this opportunity to provide you with Commission staff comments on Plan Princeton. We previously provided comments on the Plan Princeton Alternatives in our letter to you, dated November 3, 2014. Since that time, San Mateo County staff has identified a preferred plan for the Princeton area as outlined in the County document *Plan Princeton, Preferred Plan and Policy Framework*, dated March 2015. We have preliminarily reviewed the proposed preferred plan and appreciate the County's responsiveness to our earlier comments. This letter provides comments on the preferred alternative that County staff, with input from the public, has identified.

Land Use

The preferred plan would extend the Coastside Commercial Recreation (CCR) zoning designation along Princeton Avenue and proposes little change/modification to any of the other land use designations. Other land use changes include a new General Plan land use designation to correspond with Waterfront zoning, which will ensure that marine-related uses are a priority use. Conflicts may be created between the proposed land use designations (specifically the expanded CCR and existing medium high density residential area) and the existing Local Coastal Program (LCP) Implementation Plan (IP) tsunami inundation area criteria (LCP Section 6326.2), which only allows residential structures and resort development designed for transient, or other residential uses, in tsunami inundation hazard areas under certain circumstances. The Cal EMA maps show the maximum probable tsunami wave inundation to reach as far inland as the existing medium high density residential areas. The County should clarify the intent of the existing tsunami hazard criteria contained in the certified LCP and any proposed restrictions that will be placed on new development or redevelopment allowed within these land use designations that are proposed for location within the tsunami inundation hazard area to ensure consistency with the LCP, or the County should consider amending the current LCP tsunami hazard criteria.

The County should also consider the issue of the existing, non-conforming residential structures/use in the Princeton area and the potential for redevelopment of these existing non-

conforming residential uses in the future, given the current LCP zoning nonconformities standards outlined in Chapter 4 of the IP. Please identify how the preferred plan will address consistency with the existing LCP tsunami inundation hazard area criteria and the Half Moon Bay Airport Plan when residential redevelopment is proposed in an area not zoned for that purpose.

Circulation and Streetscape

The purpose of the preferred plan is to improve the balance between all modes of circulation in the area. The facilities made available to the public need to support a range of users. The preferred plan incorporates a bike network where none currently exists.

In the preferred plan, bike circulation is being directed onto Cypress Ave between Highway 1 and Airport Street. The Big Wave project (PLN 2013-00451), recently approved by the San Mateo County Board of Supervisors, will significantly increase traffic along this roadway segment especially if a new traffic light or round about is put in place at the intersection of Highway 1 and Cypress Ave (which is proposed as mitigation for the project at full build out). In light of this, the County should consider alternative bike routes for this segment including pursuing an agreement with Half Moon Bay Airport for the development of a bike access and trail on Marine Boulevard.

Please inform us of when the Transportation Management Plan will be completed. The County should ensure that any outcomes of the transportation management planning are evaluated for consistency with the preferred plan.

Coastal Access and Shoreline Issues

Along the shore of Capistrano Road from Barbara's Fish Trap to the edge of the vacant lot located between Capistrano Road and Denniston Creek, alternatives should be examined for removal or reduction of the existing rip-rap to allow for some natural shoreline retreat on the vacant lot if appropriate. Alternatives to allow for some natural shoreline retreat on the vacant parcels located along the shoreline between Columbia and Vassar should also be investigated.

The County should consider how the preferred plan can address the existing alleged unpermitted shoreline protective devices located between Vassar and West Point Avenues. New development proposed along the shoreline should not be allowed unless it is safe from coastal hazards for the life of the prospective project (being evaluated and considered) without needing any shoreline protection and/or breakwaters. The existing devices have not been analyzed or permitted as appropriate devices consistent with the Coastal Act and the County's LCP.

The Commission requires permit conditions for new development that include no future shoreline protection and require the removal of development or retreat to an area inland when it is threatened by coastal hazards including sea level rise. A managed shoreline strategy should include an evaluation of managed retreat in the area. Shoreline stabilization for Princeton should

include an alternatives analysis to the installation of shoreline protective devices, which examines the use of dredged material and other soft solutions.

We support a focus on maximizing coastal access and suggest that policies to preserve and replenish beach areas in the Princeton area are thoroughly vetted and included.

Water

Please look at how the preferred plan's proposed changes to land use designations could affect build-out estimates for sewer and water done through the Midcoast LCP Update. Would these estimates require modification?

Conservation

The preferred plan will incorporate protection and restoration measures for natural resources; and intends to formulate policies to preserve agriculture. Consideration should be given to policies that require agricultural easements for projects that involve conditionally permitted uses on agricultural land. We suggest that the preferred plan ensure the protection of agricultural land/resources in perpetuity.

We are very supportive of your efforts to develop a Master Plan for Princeton as it should provide clarity for development activities specifically within Princeton. We expect to participate further with County staff and look ahead to your continued planning updates as you move forward with this process. Please feel free to contact me at (415) 904-5260 if you have any questions concerning these comments.

Sincerely,



Renée Ananda
Coastal Program Analyst
North Central Coast District

CC: Steve Monowitz, San Mateo County

