

August 11, 2004

**Planning & Zoning
Committee of the
Midcoast
Community Council**
PO Box 64, Moss Beach
CA 94038
Serving 12,000 residents

To: **Sara Bortolussi**
San Mateo County Planning and Building Division
Mail Drop PLN122, 455 County Center
Redwood City, CA 94063
650.363.1839 - FAX: 650.363.4849

re: **PLN2000-00812:** Coastal Development Permit,
PAD Permit & Minor Subdivision to subdivide a
152.89 acre parcel into 2 parcels, the conversion of 3
agricultural wells, the construction of a new 6,456 s/f
single family residence, addition of 7 water tanks for
fire suppression, and the legalization of an existing
mobile home as temporary housing during
construction at 300 San Juan Ave, El Granada. APN
047-320-060

Sara:

The Planning and Zoning Committee of the MidCoast Community Council reviewed the above-referenced application at it's special meeting of June 30, 2004, and at many regular meetings before that. Two site visits were conducted, the most recent by committee members Karen Wilson and Chuck Kozak with the owners on June 19, 2004. We've collected our comments in this letter, grouped together by the individual components of the proposed project.

Construction of a New 6,456 S/F Single Family Residence, Addition of 7 Water Tanks for Fire Suppression, and the Legalization of an Existing Mobile Home as Temporary Housing During Construction:

1. **Site Location:** The proposed location of the new residence appears to be determined by a combination of the desire of the owners for privacy and views and restrictions on other potential building areas on the property. Much of the property has steep slopes in excess of 30%, areas of prime soils and/or sensitive habitats, or would require excessive road construction and grading that would preclude selection for building sites. The only other immediately obvious site might be down along San Juan Avenue at the lower southern end of the property, but this would necessitate substantial tree removal.

The proposed site has tradeoffs in it's visual impacts – as described below in (2), it is visible from areas nearby, but not as visible as other sites on the facing ridges or higher up the property would be.

Access to the site would require improvement of an existing truck road that winds up from San Juan through the lower eucalyptus grove, into a drainage swale and then up the hill to the proposed residence. During our site visit, it was noted that some species of wetland indicator species of plants were growing in the swale, specifically *Juncus effusus* (Pacific bog rush) and *Juncus balticus* (Baltic rush). This area should be carefully surveyed prior to the permitting and final design of the access road. The current proposal calls the removal of two

significant trees to improve this roadway, but our site visit seems to indicate that the road could be constructed without the removal of or damage to any significant trees. Careful and well-engineered design of the roadway would be necessary in the area where it enters the swale drainage to both avoid erosion of the road and to control runoff and negative impacts to the wetland plant species noted in the swale area.

2. **Visibility:** From observing the story poles that were set up in June, it was determined that the proposed residence will be at least partially visible from various locations along Highway 1, and fully visible from public areas to the west around Pillar Point Harbor, the community of Princeton, Pillar Point Marsh, Half Moon Bay Airport, and the blufftop along Pillar Point Ridge. This visibility brings concern about conformance to the Visual Resources component of the LCP, both in siting and design of the residence.

The visibility along Highway 1 is of concern, because much of the current screening of the house site is from trees that exist on other properties, and therefore not under any control of the property owners or of the conditions that might be part of any approval for this project. At one point, the house site is screened by a thin row of elderly cypress and pine trees in one of the street rights-of-way in El Granada. These trees could be expected to be gone within 5 years, at which point the house would be fully visible from Highway 1 in the area north of the Capistrano intersection.

Because of the high visibility of the project from the Pillar Point area, and the potential for near-future increased visibility from Highway 1, we believe that the design and color of the house and its accompanying landscaping is critical to minimizing the visual impact and should be a key consideration for any decision on the project. These issues are addressed below.

3. **Design:** The house as proposed is a three story design, with the lower story partially set into the hillside so that only two stories are visible from the rear. The most visible parts of the house (the "Front" and "Left Side" elevations) present full three-story profiles rising 36' above the level of the finished grade. The front elevation would be the side visible from Highway 1 and other public viewpoints to the west, while the left side elevation would most visible to the adjacent neighborhood along San Juan to the northwest of the property.

The left side elevation has no articulation or setback of its three stories, and minimal detail. As one of the most visible sides of the house, the committee agreed that this was an unacceptable design element.

Although we thought that the general house design had its merits, many of the committee members thought that a three-story design was inappropriate within this setting and by the guidelines of the applicable Development Review Criteria of Chapter 20A.2 the Zoning Regulations. In light of the requirements of SECTION 6324.2.(a) SITE DESIGN CRITERIA that " ... *Development shall be located, sited and designed to carefully fit its environment so that its presence is subordinate to the pre-existing character of the site and its surrounding is maintained to the maximum extent practicable...* ", committee members thought that a single story design, or a two-level design with significant setback of the second level to match the

topography, would be more appropriate and would present easier to mitigate visual impact.

In this case, to achieve an equivalent amount of floor area, the house would create a larger footprint than the one proposed, but would also afford design opportunities to fully integrate into the existing landscape. Members of our committee, some with extensive design and review experience, would be available to help the applicant and owners in developing other house designs.

With these considered options, the committee recommends that any proposed design be fully analyzed in light of Chapter 20A.2 to ensure maximum conformance.

- 4. Landscaping:** A finished landscaping plan was not available for our review, and the applicant and owner promised that we would receive it for review when it was available. In general, we thought that with the three-story design, mitigation of the visual impact with landscaping and shielding would be difficult at best, and nearly impossible to maintain over the long run, and that the adoption of a lower profile design for the house would also improve the success of the landscape shielding.

Shielding a large 36' tall house that was dominant to its surrounding landscape would require a tight screen of tall trees that would also impact the view out from the residence. Even at the larger sizes now commercially available, fast growing, coastal-appropriate tree species would need at least 5 – 10 years to establish an effective screen.

A lower profile house that is subservient to the landscape in its form and color would require less direct screening if it does not stand out as much. The screening could be established faster, and its density would be lower, preserving the harbor and ocean views of the house site.

- 5. Other Considerations:** The proposed new residence should be considered in connection with the proposed creation of the new parcel and any subsequent development of that new parcel, in terms of impacts on the adjoining residential neighborhood, traffic patterns, and potential shared resources (water, septic, access). Consideration should also be given to the issue raised at our meeting by concerned neighbors (and reiterated in their letter of July 24, 2004) that the County confirm that all efforts have been made to fully analyze potential building sites throughout the entire area of the parcel.
- 6. Water Tanks for Fire Suppression:** The applicant presented the latest plans with the addition of the fire suppression system water tanks. The committee had no issue with their location or function, and recommends that they be buried as much as possible, colored to blend into the grassland/scrub background of the area, and sufficiently screened with landscaping.
- 7. Legalization Of Existing Mobile Home As Temporary Housing During Construction:** The committee had no issue with this point, other than to recommend that after construction of the new residence that the existing mobile home and accompanying structures be removed and the site be restored to either potential active agricultural land or natural habitat as

applicable.

The owners have made the comment that they would like to keep the existing mobile home as future farm labor or affordable housing – to our knowledge, this has not become part of the formal application. Our committee recommends that if this is the case, that this decision be made now as part of this process and not at some future date under separate application. This is to ensure that all existing and known planned potential development of the property can be considered together to properly analyze the cumulative impacts and effects.

Subdivision of a 152.89 Acre Parcel into 2 Parcels of 4.79 Acres and 148.1 Acres:

8. **Parcel Siting:** The proposed second parcel (Parcel "B") is the same as the center one of the three new ones originally proposed. The plan to create three new parcels was dropped when it was clarified that the property was in the scenic corridor and that the planned density credit transfer could not take place.

The proposed location of parcel B would create a housesite that would be very visible, not only to the immediate neighbors along San Juan, but also from other surrounding neighborhoods, the highway and surrounding public view areas. Access to the parcel has the potential to be very disruptive to surrounding areas and adjacent properties (see #9 below).

We think the opportunity of only creating one new parcel, and the flexibility to put it in the most logical, workable, and least impactful area, should be taken advantage of, and not just use pre-defined boundaries developed for a different plan and strategy of development.

We recommend that the new parcel (if one is created – see #10 below) be located at the southeast corner of the property, which would, in our opinion, be more in compliance than the proposed parcel with the criteria of PAD Zoning Regulation **SECTION 6355**.

(SUBSTANTIVE CRITERIA FOR ISSUANCE OF A PLANNED AGRICULTURAL PERMIT.), specifically **6355.F**: "...For parcels adjacent to urban areas, permit conversion if the viability of agricultural uses is severely limited by conflicts with urban uses, and the conversion of land would complete a logical and viable neighborhood and contribute to the establishment of a stable limit to urban development, and conditions 3, 4, and 5 of this subsection are satisfied.". The parcel should be as small as possible while still safely accommodating a well and septic system, as stipulated in **6360.B** of the PAD Zoning Regulations. The existing well near this site may or may not be used, and should not be an overriding factor in drawing the boundaries (see #11 below).

The parcel should be configured to limit the potential building sites to the lower northwest facing slope of the area, which would minimize its visibility from the highway and points to the west, as well as shield it from most of the neighboring houses on San Juan Ave. and create options for more reasonable and flexible access (see #9 below).

9. **Parcel Access:** The proposed parcel B location would necessitate either access from a narrow, one-way section of San Juan Avenue up a very steep slope, or else long entry driveways from the east or west across Parcel A. Both of these options would be undesirable

if an alternative existed.

Access to the alternative proposed by our committee would be from the intersection of San Juan and Ferdinand, and would not need to use the one-way section of San Juan Ave. A shared driveway/entry could be configured with the existing easement access for the CCWD water tank.

10. **Other Considerations:** Consideration should also be given to the issue raised at our meeting by concerned neighbors (and reiterated in their letter of July 24, 2004) that the materials supplied by the applicant do not indicate that all considerations, as detailed in the PAD Zoning Regulations, of siting any new parcel were fully analyzed, and that the County ensure that all efforts have been made to fully analyze potential new parcel configurations throughout the entire area of the property.

There is also an expressed controversy of the exact size of the property, characteristics affecting development density, and the density analysis process that derived the 2 density credits for the property. As the actual number from the analysis (1.58) is very close to rounding off to 1 instead of 2, we request that this analysis be carefully confirmed to determine its accuracy.

Conversion of 3 Agricultural Wells

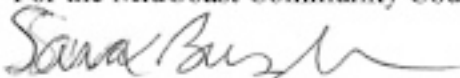
11. **Permitting of Ag wells obviously intended for residential use:** The MidCoast Community Council has had a standing opposition to the permitting of Agricultural Wells that are clearly intended for residential conversion, as this side-steps the required exploration and environmental process of legitimate residential water supply development by allowing random, unchecked well exploration. Although it is claimed that the conversion process covers these aspects, we feel that the lack of initial site analysis and monitoring is a threat to our water quality and health of aquifers.

For this reason, we do not believe the 3 existing agricultural wells should be given any special consideration in the decisions on new development siting, either of structures or parcel boundaries, i.e., boundary lines or construction sites not be shifted from optimum configurations because of the convenience of an existing agricultural well.

12. **Use and Abandonment of wells:** We recommend that existing and new wells be analyzed for potential of serving both proposed residences from a single well if possible, and that all wells not used for residential development or specific agricultural uses be abandoned.

Thank you for your help with this application. Please keep us informed of any future changes, re-designs, hearings, approvals or appeals of this project.

For the MidCoast Community Council Planning & Zoning Committee,



Sara Bassler

Chair, P+Z Committee
SB/ck