



August 26, 2002

Via Fax & Email: 3 Pages total

To: San Mateo County Planning Commission
c/o Kan Dee Rudd, Planning Commission Secretary
County Office Building
455 County Center
Redwood City, CA 94063

cc: Mark Duino, San Mateo County Planning & Building

re: Agenda item for 8/28/02: Proposed Rural House Size Regulations (PLN 2002-00327)

Dear Members of the Planning Commission:

At our meeting of 8/21/02, the MidCoast Community Council's Planning and Zoning Committee reviewed the proposed regulations regarding Rural House Size. We had the following comments;

1. We support the proposed basic house size and height regulations as proposed by staff as consistent with the intent of the PAD, RM and TPZ zoning regulations and their intent to preserve agricultural use, open space, and resource management areas.
 - a. We further recommend that **ALL** "habitable" residential areas be counted as square footage for these calculations, including storage areas, work areas, attics, basements and garages.
 - b. As the main intent is to reduce the bulk and mass of the exterior of the house, interior areas over 12' in height should be proportionally rated to add to the floor area calculation of the residence at a ratio up to twice the area at 22' in height: every 1' in interior height over 12' increases the floor area calculation of that part of the house by 10% (i.e. – a 1000 sq/ft "great room" with an interior ceiling height of 22' presents the same exterior mass as two floors of regular rooms and should be counted as 2000 sq/ft. Subsequently, an interior height of 17' would be rated at 150% of the floor area: $((17-12)/(22-12)+1)$.

A similar formula should be applied to any lower part of the structure, enclosed or not, that adds to the exterior bulk of the house and could, at some future time, be enclosed, finished, and used as a habitable area.

2. We do not support the proposed exceptions/incentives without the following issues and conditions being addressed:
 - a. Unseen from public road: the siting of construction on the least visible part of the parcel is already required by the LCP and the Development Review Standards for rural zoning districts.

This would be a bonus for following policy that should already be enforced, and would be unfairly penalizing owners of parcels where no other feasible building site might exist.

- b. Underground credit: Again, existing regulations and policy that stipulate sensitivity to existing topography and visual resources encourage some parts of residences to be built below ground level, so this, too, would be a bonus for simply following existing regulations.

It should be clarified that any “incentive” area square footage (i.e., the 2,000 sq/ft underground) needs to be counted as part of the existing floor area before any incentive floor area would be allowed (see 1.a. above.) Unfinished and uninhabitable basements or any other similar space should not be counted as floor area for any incentive.

- c. Affordable housing credit: Existing policy and regulation offers ample incentive and ease of implementation for Farm Worker housing, and this incentive would not add any known benefit to the Farm Worker Housing need or supply.

As written, the affordable housing for “Local Work Force” incentive would allow the estate builder to supply property staff quarters for their own employees AND get a bonus of house size at the same time. This would not be consistent with the intent & purpose of existing and these proposed regulations. This would also be in conflict with the RM/CZ regulations, where second units are specifically disallowed.

Both these aspects allow wealthier applicants to “buy out” of the house size restrictions while penalizing those who cannot afford the extra expense.

- 3. We support the establishment of Architectural and Design Standards with the following specifications:
 - a. Extend the Design Review overlay district to all rurally-zoned lands
 - b. For PAD and RM parcels within and adjacent to the urban boundary and the Rural Residential Area on the MidCoast, the standards should be developed, managed, and implemented by the existing Coastside Design Review Committee.
 - c. For lands in the rural areas throughout the Coastal Zone, the standards should be developed through a public hearing process and administered by staff level Design Review.
- 4. We recommend the County apply the findings and decisions of this process to the specified “TASK 14: Adequacy of Zoning Controls in Rural Residential Areas” of the ongoing MidCoast LCP Update process. This task is currently scheduled for a public workshop on October 7.

5. We support the establishment of the 200 sq/ft buffer zone proposed in the addendum, but recommend that the language be clarified to specify that uses permitted within the buffer zones, aside from restricting residential construction, also are still limited to existing uses within the underlying zoning district.

With the above recommendations & modifications, the MCC P&Z supports the amendment of the Zoning Regulations and applicable LCP Policies to regulate house size in the rural areas. Thank you very much for your time and work on this matter.

For the MCC Planning & Zoning Committee,



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