

<p>Planning & Zoning Committee of the MidCoast Community Council PO Box 64, Moss Beach CA 94038 <i>Serving 12,000 residents</i></p>	<p>January 29, 2003</p> <p>Miroo Brewer San Mateo County Planning and Building Division Mail Drop PLN122, 455 County Center Redwood City, CA 94063 650.363.1853 - FAX: 650.363.4849</p> <p>re: PLN 2002-00812: Minor subdivision, conversion of ag wells, construction of new single family residence and legalization of existing mobile home, at 300 San Juan Ave, El Granada. APN: 047-320-060.</p>
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Miroo:

The MidCoast Community Council Planning and Zoning Committee reviewed the above referenced application at our regular meetings of 11/20/02 and 01/15/03. At this two meetings and at a site visit with the applicants, we identified a number of issues that we feel need to be addressed before this proposal could proceed.

We would like to thank to the applicants for the thoroughness and thoughtfulness they have applied to date to this application, and hope that these comments will help clarify the issue and concerns surrounding this project. To this end, we would like to schedule a meeting as soon as reasonably possible with yourself, the applicants and their representatives, and members of the MCC P&Z Committee to resolve the issues detailed below.

There is a high level of concern from the community on this proposal – the rural lands that border our urban areas are a valuable component to the character and quality-of-life of the MidCoast, and our concern that conversion of these lands to residential use be done in full conformance to the policies of the LCP intended to protect that character & quality.

1. Visual and Scenic Corridor Issues: A major point of discussion concerns how this project sits in relation to requirements concerning scenic corridors, and just what the definition of “scenic corridor” entails.

Policy 8.28 of the LCP (Definition of Scenic Corridors) reads:

Define scenic corridors as the visual boundaries of the landscape abutting a scenic highway and which contain outstanding views, flora, and geology, and other unique natural or manmade attributes and historical and cultural resources affording pleasure and instruction to the highway traveler.

Policy 8.30(a) of the LCP (Designation of County Scenic Roads and Corridors) reads:

Expand existing County Scenic Corridors to include the visual limits of the landscape abutting the scenic road.

The County publication “Coastside Cultural Resources of San Mateo County”, explains the delineation of County scenic corridors in Section 5 (pages 79 – 81), lists its criteria in Table III (pages 82 – 84), and illustrates the defined boundaries for the MidCoast in Map III (page 85). A copy of the map with the subject parcel area indicated is included with this letter. Specific criteria of interest include the “Range of Visibility” and “Landscape Characteristics” as they may apply to aspects of this application.

If the Scenic Corridor definition applies to this property, than the relevant sections of the LCP (Section 8, Visual Resources Component), PAD Zoning Regulations (Chapter 21A), Development Review Criteria (Chapter 20A.2), and other relevant sections of the LCP, Zoning Regulations, and General Plan need to be considered in the various aspects of this project, as indicated in the following sections.

Recommendation 1: Determine definition and extent of scenic corridor and how it affects this project.

2. Notification: Development on rural lands outside the Urban/Rural Boundary do not carry the same notification requirements as properties within the urban residential areas. As such, none of the immediate neighbors along San Juan, Navarra, Ferdinand, Carmel and other nearby streets have received any notification of this project. As the creation of three new estate-sized parcels along San Juan, along with the associated concerns of access, views, construction, traffic, groundwater, septic field, erosion and drainage issues will directly affect these residents, we believe that a notification system be established.

Recommendation 2: Determine a notification area similar to that used within the R1 district (within 300’ of the borders of the subject property) and supply all property owners with notices and necessary plans and descriptions of the project as it currently is proposed and any changes as it progresses.

3. Main Residence Design & Siting: Our understanding is that the site for the new residence was chosen from an analysis of the location of Prime Soils, Sensitive Habitat Areas, current active agricultural areas, and scenic corridor considerations. We would like to verify that the scenic corridor requirements, if expanded as explained in item 1 above, have been fully taken into consideration. Our site visit demonstrated that the site is visible from Highway 1 immediately east of the harbor, and again from an area near Denniston Creek, and could be more visible in the near future is the current shield of trees on the lower slopes is thinned or removed.

We understand the difficulty the property presents in designating a reasonable building site that conforms to all applicable regulations and restrictions, and feel that the proposed site, or something nearby it, can be made to work. We have not fully reviewed the house design until the issues on scenic corridor designation have been resolved, but would like to see the current site and design tested for visibility from the highway to help determine

what might be needed to meet conformance.

Recommendation 3: Erect basic story-poles at proposed building site of new residence indicating peak roof elevations and general extent of structure. Poles should be substantial enough and colored bright orange so that visual impact from highway and any surrounding areas can be assessed.

4. Minor Subdivision: The immediate concern is the issue of whether this section of the property is within the scenic corridor area. Policy 5.11(e) of the LCP (Maximum Density of Development Per Parcel) states (emphasis added):

*Density credits on parcels consisting entirely of prime agricultural land, or of prime agricultural land and land which is not developable under the Local Coastal Program, may be transferred to other parcels in the Coastal Zone, provided that the entire parcel from which credits are transferred is restricted permanently to agricultural use by an easement granted to the County or other governmental agency. **Credits transferred may not be used in scenic corridors** or on prime agricultural lands; they may be used only in accordance with the policies and standards of the Local Coastal Program.*

Our recollection is that when this policy was added in 1988, a survey was done of potential recipient PAD parcels within the MidCoast area to determine the potential impact of added development to the area from this policy, and the only parcels that qualified were the ones located to the north of Montara Creek between Montara and Moss Beach (APNs 036-310-XXX), and that others were not eligible because of either scenic corridor or prime soil issues.

We are very concerned about the possible precedent that might be set in this case with the transfer of density credits to properties not previously recognized as eligible for this transfer. See Recommendation 1 above.

There is also substantial issue with how access to the proposed new parcels would be accomplished. San Juan Ave., within the urban boundary and which borders the southwestern edge of the proposed new parcels, is a one-way road improved to less-than minimum width, and residents are concerned with the additional traffic that the construction of three new houses would bring to this small road. The subject property rises quite abruptly to the west of this street, and access driveways would require extensive cutting, grading, retaining walls and reinforcement to meet required standards, to an extent as to require excessive disruption to the topography and landforms so as not to conform with the requirements of the Development Review Criteria.

Suggestions were put forth about alternate access possibilities, such as accessing all parcels from a common road along the north-western edge of the property (a logical extension of Ferdinand Ave.) or reconfiguration of the parcels along this north-western edge of the property.

In addition, issues were raised concerning:

- Viability of proposed subdivision in respect to requirements of new wells, developments and septic systems affecting recharge of other agricultural and residential wells, storage ponds, and possible groundwater or storm runoff contamination,
- Viability of proposed parcel configuration in regards to PAD regulations regarding maintaining existing or potential agricultural operations and maintaining practical buffer zones between residential development and agricultural operations. Land surrounding the proposed residential parcels is still viable grazing land, and as such considered “Lands Suitable for Agriculture” in Section 6351.B of the PAD regulations, and the proposed “Parcel C” is adjacent to a small PAD parcel used for keeping a small herd of goats. This consideration was one of the key components in the recommendation of denial from the SMCo Agricultural Advisory Committee, the MidCoast Community Council and the denial by the Planning Commission of the proposed Lot Line Adjustment and subdivision of the Ocean View Farms property north of Montara.
- Required analysis of perc test sites and proposed septic field locations in relation to parcel sizes and building envelopes as per Section 6360 of the PAD regulations,
- Inclusion of deed restrictions of right-to-farm ordinance (Section 6361(d) of PAD regulations) to any new parcels created.

Recommendation 4: New tentative maps should show building sites, well locations, and septic field locations, analysis should be provided on groundwater, runoff and contamination from development, and consideration should be given to alternate parcel configurations and access possibilities to lessen impacts on visual resources, neighboring development, and agricultural uses.

5. Drilling of Ag Wells and Subsequent Conversion for Residential Use: The Committee found the pre-approved ag wells on the property to be unsettling – previous applications for ag wells that were specifically intended for conversion to residential use(reference PLN 2001-00667) were determined by the Planning Administrator to not be eligible for ag well permits, as they were not intended for agricultural use, but were skirting the regulations, considerations and requirements for initial residential well drilling activities.

Recommendation 5: We did not receive any notice of the drilling of the three wells for the three proposed parcels, and in light of the above determination concerning use of ag well permits for residential use, recommend that the existence and location of these wells have NO determination in the configuration any future parcels created within the property, and that the wells be decommissioned if they are not to be used for either residential or true agricultural purposes.

6. Legalization of Existing Mobile Home: The Committee had no issue with this portion of the proposal, and would be in agreement to a decision to proceed with this part of the application as soon as reasonable with the condition that the home be removed once any other residence on the main parcel is complete.

Thank you for your help, and please keep us informed of any further developments, redesigns, hearings, approvals or appeals concerning this application.

For the MCC Planning & Zoning Committee,



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