

**Midcoast Community Council
P.O. Box 64
Moss Beach, CA 94038**

May 1, 1996

The Honorable Ruben Barrales, President
San Mateo County Board of Supervisors
Government Center
Redwood City, CA

re: The Coastside Protection Initiative (CPI)

President Barrales and other members of the Board,

You have received from the MidCoast Community Council (MCCC) a series of letters over the past year in which we outlined our positions on various portions of the CPI. The purpose of this letter is to provide an overall summary of, and a basic conceptual framework for, our recommendations.

A general theme running through the statements of people opposed to the CPI is that the Local Coastal Plan (LCP) already provides adequate protection of the coastside. While the MCCC believes the LCP is an excellent framework, as with all plans, it should be seen as dynamic and subject to regular review, and enhancement as appropriate. The residents of the midcoast, through their representative MCCC, believe now is the time for such a review and enhancement. For this reason, we believe it is appropriate for the Board of Supervisors to have pursued this review of the CPI, and we recommend that you approve the amendments in accord with our comments.

We will be present at your public meeting in Half Moon Bay on May 7th, and look forward to the opportunity to discuss this in more detail.

Using the same amendment listing as found in the report from the Planning Commission dated April 23, 1996, here is our summary.

RURAL COASTAL ZONE

1. Base non-residential development density on peak water use, with no credit for water conservation.

MCCC supports this amendment. We disagree with the Planning Commission.

2. Require one density credit for each 5,000 square feet of house floor area, excluding certain parking and accessory uses. Allow density credit transfer.

MCCC supports this amendment. In addition, we request that a local design and development review process be established for approval of any project that involves the transfer of density credits, or any project that requests a waiver to this policy. We disagree with the Planning Commission.

3. Require a separate on-site well water source on each new subdivided parcel.

MCCC supports this amendment. As the Board knows, the issues of wells and septic systems are intertwined, and at the center of great concern and controversy. We believe the practice of requiring each site to be self-sufficient, as called for in the LCP, is an appropriate step in the right direction. We disagree with the Planning Commission.

4. Eliminate the density bonus for voluntary merger or consolidation of contiguous parcels.

MCCC supports this amendment. We disagree with the Planning Commission.

5. Locate development on least visible site.

MCCC supports the various sections of this amendment. We have not had the opportunity to publicly discuss the Planning Commission's proposed revisions to certain sections.

6. Increase steep slope hazard avoidance.

MCCC supports the various sections of this amendment. We have not had the opportunity to publicly discuss the Planning Commission's proposed revisions to certain sections.

7. Eliminate possibility of increasing permitted development density on appropriate sites after public agency park acquisition.

MCCC supports this amendment. We agree with the Planning Commission.

URBAN MID-COAST

8. Limit house size on substandard residential lots by

- (a) requiring use permit approval for development on parcels less than 5,000 square feet, and
- (b) limiting house floor area to 50% of parcel size.

The MCCC believes

- (a) a use permit is inappropriate; the proper tool is a variance permit,
- and

- (b) we support the 50% floor area ratio, with the added proviso that structures be limited to a single story on 25 foot wide lots.

We call your attention to our 12/8/95 letter to the Planning Commission, in which we referred to a 6/15/93 Planning Division staff report that identified nearly 2,000 undeveloped substandard lots in the midcoast area; copies of both our letter and the staff report are attached hereto. As we stated in December, "any ordinance or

regulation that actually encourages the building of large, inappropriate structures on this many lots will have a very significant effect on the environment.”

Also, since the CPI language was originally drafted, the Board has approved the Home Improvement Exception (HIE) ordinance. We request that the Board specifically clarify the relationship between this proposed amendment and the HIE. We believe the most appropriate relationship is that the HIE cannot be used to exceed the 50% floor area ratio.

We disagree with the Planning Commission.

9. Protect mid-coast ocean views.

MCCC supports the various sections of this amendment. We have not had the opportunity to publicly discuss the Planning Commission’s proposed revisions to certain sections.

10. Clarify that the maximum development density of rural designated land in the urban mid-coast is the same as rural designated land elsewhere in the Coastal Zone.

MCCC supports this amendment. We agree with the Planning Commission.

BLUFF TOP DEVELOPMENT

11. Set back bluff top development at least 50 feet from the edge of the cliff or a distance equal to 50 years cliff erosion from the edge of the cliff, whichever is greater.

MCCC supports this amendment. We disagree with the Planning Commission. We believe the history of development along the cliff / bluff in the mid-coast makes it clear that, contrary to the Planning Commission’s report, existing regulations either do not require setbacks of 50 feet, or if the regulations do require such setbacks, then the regulations are being waived in almost every case.

GRANDFATHERING PROVISION

This language was not in the CPI. The MCCC believes such grandfathering as suggested by the Planning Commission is inappropriate, but at the very least, the two situations outlined by the Commission should be addressed separately. As much as the MCCC opposed the Development Agreement for the Fishing Village, there can be no disagreement that there is a very great difference between such a thoroughly, publicly discussed document, and a simple permit application.

Finally, we thank Mr. George Bergman of the Planning Department for his help to the MCCC. Mr. Bergman worked with us for many months to help us understand the nuances of both existing regulations and these proposed amendments, and we appreciate his patience. Any flaws in our understanding of zoning issues are certainly not his fault.

If you have any questions, please feel free to call any member of the Council. I can be reached at 415-728-1907. And again, we look forward to seeing you in Half Moon Bay on May 7th.

Sincerely,
MidCoast Community Council

A handwritten signature in black ink, appearing to read "Chris McComb". The signature is fluid and cursive, with the first name "Chris" written in a larger, more prominent script than the last name "McComb".

Chris McComb
Chair

attachments:

MCCC letter to the Planning Commission, 12/8/95
Staff Report, T. Burnes, 6/15/93