

MidCoast Community Council
Post Office Box 64
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To: San Mateo County Planning Commission
From: MidCoast Community Council
Date: 19 December 1997
Re: Environmental Impact Reports for Greenhouse Permits (cf. CDP 93-0024)

Dear Chairman Nobles and Commission Members,

The MidCoast Community Council urges the Planning Commission to require a complete environmental impact report for any commercial greenhouse project adjacent to residential development or sensitive habitat, to fully study the potential cumulative environmental impacts of the entire project. The following background discussion supports our recommendation.

Our Council reviewed the Planning Staff report prepared for your November 12, 1997 meeting regarding the specific proposal for 15 greenhouses totaling 180,000 square feet (CDP 93-0024) and heard presentations from interested members of the public (including representatives from the Pescadero Municipal Advisory Council). The videotape of your November 12, 1997 Planning Commission hearing held in Pescadero had been rebroadcast on MCTV Channel 6 and was available to members of our Council who were interested in reviewing it, as well. We did not consider the merits of this specific project, but rather limited our consideration to the more narrow issue of how extensive an environmental review appears to be legally mandated for any project of this nature.

Our involvement is motivated because we recognize the significant impacts a similar project would have if proposed for the MidCoast ? which appears to be possible given current zoning and land use designations. We are particularly concerned that a simple Negative Declaration is viewed by the Planning Staff as sufficient for a project of this size. We strongly disagree, especially when a project proposes using significant amounts of hazardous chemicals and pesticides that can be airborne or waterborne into adjacent residential areas, and especially when any accidental discharges into nearby creeks are likely to have significant consequences on sensitive habitats. We are concerned that potential impacts on surrounding residential areas are being dismissed too quickly, and that this will establish a precedent that may make it difficult to require a complete EIR if a project were proposed for a much more densely populated area. Of course, human safety is important whether it is only a few dozen or a few thousand homes. The public record of significant questions and issues that were ignored by the Negative Declaration, as contained in the attachments to the Planning Staff report, may well be a precursor to litigation if you do not require a full EIR.

The County has an unfortunate record in allowing applicants to violate the terms of their conditional use permits, and apparently has little in the way of effective enforcement mechanisms that it is willing to use. Therefore, the time to perform a thorough evaluation is before any construction under a permit is started, rather than retrospectively after the applicant has exceeded the conditions of approval or has had an environmentally damaging discharge. A thorough EIR may identify reasonable precautions that can be required to prevent or minimize hazards resulting from accident or aggressive operation close to (or in excess of) the maximum allowed operating conditions. Such a report could also recommend preventive measures to protect against the inevitable "500-year flood" that will inundate the entire project site, carrying herbicides, pesticides, and other dangerous materials into the marsh.

For these reasons, we strongly urge the Commission to require a full environmental impact report on this project.

Sincerely,

David Spiselman, Chair

Paul Perkovic, Secretary

MidCoast Community Council

97-066; approved 5-1-0 with one absence on 10 December 1997