

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

December 8, 1995

Mr. Leo Mariano, Chair
San Mateo County Planning Commission
County Government Center
Redwood City, CA 94063

re: Coastside Protection Initiative, and recently proposed modifications thereto

Dear Chairman Mariano and members of the Planning Commission,

At its regular December 6th meeting, the MidCoast Community Council (MCCC) reviewed the proposed modifications to the CPI as contained in the Save Our Shores Committee (SOS) 12/6/95 letter to the Planning Commission. It is the unanimous finding of the MCCC that several of these proposed changes are inappropriate, and in fact are counter to some of the key basic concepts of the original initiative.

This letter will address each of the proposed modifications, referencing the identifying point numbers in both the SOS letter, and the 12/13/95 Staff Report (SR), and provide our position and recommendation.

SOS 1.A, SR 1.a: revision of calculation of maximum density for non-residential land uses

As stated in SOS 1.A, the rationale for this proposed change is input from PMAC; this was also used as the reason for the proposed removal of "coastal dependent" language. The MCCC has no reason to challenge the recommendations of PMAC as regards their area of oversight, but likewise, it is completely inappropriate to use PMAC recommendations as justification for impacting the midcoast area under the oversight of MCCC. We do not support this further increase (to 945 gallons per day) of the density bonus, though we do support the original bonus where it is for coastal dependent visitor serving uses. We request the inclusion of "coastal dependent" language for the urban area, and we support the density bonus structure as described in Section 4(a)c(1) of the CPI.

SOS 1.B, SR 1.b: clarification of 5,000 square foot limit on house floor area

The MCCC supports these additional clarifications, but only in as much as a representative of Save Our Shores Committee explained that the 200 square feet of residential storage space, equipment shed, pool house, and workshop (attached or

detached) is *aggregate*; i.e., the intent is not to exempt 200 square feet of storage space, **and** 200 square feet of a workshop, etc.

SOS 1.C, SR 1.c: deletion of requirements for consideration of contiguous parcels in common ownership

We do not agree with this deletion, as we believe such consideration is compatible with existing laws and regulations.

SOS 2.A, SR 1.d, e: limitations on building size on substandard lots, and applying these limitations to non-residential lots only

The MCCC is most troubled by this proposed modification, and we most strongly object to any such weakening of zoning regulations regarding substandard lots.

As county staff reported in 1993, there are nearly 2,000 undeveloped substandard lots in the midcoast area. 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. In all of our public hearings on the CPI, not a single member of the public has requested such a change in our community. Rather, the message has been that we should encourage appropriately-sized homes on these substandard lots, as this will both maintain the nature of the community, and offer opportunities for affordable housing. There have also been long-time members of the community remind us that this is historically proper, out of respect for the many people that observed the letter *and the spirit* of zoning regulations, and built larger homes only on lots of at least 5,000 square feet.

We return to our earlier recommendation, which is to endorse the language of Section 11 in the CPI, with the addition that structures be limited to a single story on 25 foot wide lots. There should be no change to the 50% factor used to calculate building size and floor coverage.

Further, we advise that any changes in the CPI that endorse structures other than those contemplated by the original CPI will result in a significant change in the density of the midcoast area. In that case, an Environmental Analysis (at the least) will be required, that will address, but not be limited to, the following areas: traffic, sewer, water, noise, views, schools, and fire. We are aware of County Counsel's 8/9/95 memo, which essentially says that the County does not need to certify CEQA compliance for this CPI; such certification, however, will be required at some point, and it does not seem to be in anyone's interest to specifically include language that will force such a time-consuming certification process.

Finally, we also point out that the language used in SOS 2.A, "...setbacks and other requirements of the zoning ordinance be applied..." is simply not reassuring. As evidenced only recently by the adoption of the Home Improvement Exception

ordinance, we know there are always new ways of circumventing regulations whose primary role is safety and health.

As the Save Our Coast letter states, "... the scope of your consideration (should) be limited to the content of the LCP Amendments..." We submit that the modifications being proposed are so contrary to the intent of the original Initiative, and the wishes of the majority of the 30,000 people that signed the Initiative petition, as to be outside the scope of your consideration.

We look forward to meeting with you at your public hearing on December 13th in Half Moon Bay. If you have any questions, please feel free to call councilmembers Jim Marsh (726-3589) or Chris McComb (728-1907), or subcommittee chair Elizabeth Vesprimi (728-9260).

Sincerely,

Elizabeth Vesprimi
Chair, Planning and Zoning Subcommittee

James Marsh
Chair, MCCC

cc: Board of Supervisors, San Mateo County