

MIDCOAST COMMUNITY COUNCIL

Serving the Communities of
Princeton, El Granada, Moss Beach, Montara and Miramar

February 18, 1992

San Mateo County Planning Commission
590 Hamilton Avenue
Redwood City, CA 94063

Honorable Members of the Planning Commission:

At its meeting of February 12, 1992, the Midcoast Community Council approved the forwarding of our comments in strong opposition to the Mirada Beach Park concept plan for consideration by the Planning Commission. While two representatives of the Midcoast Council and representatives of the neighborhood, environmental groups and the Cabrillo School District are presently meeting with the developer to explore alternative uses for the property, County planning staff and the developer intend to continue processing of the Mirada Beach Park proposal.

This application has great significance for the coastside. First, it challenges the validity and purposes of the RM/CZ district by proposing a development over 20 times the allowable intensity. The RM/CZ district is a thoughtful and well-crafted ordinance, responsive to our limited water and sewer capacities and the need for less intensive land uses on the fringes of the "urban" areas on the coast.

The site itself is of vital interest to coastside residents and for the larger region. This view is unique and not available elsewhere on the coast. The proposal would eliminate this view for one of the sunset between Winebagos. The intensity of the proposed development is an affront to the aesthetic and environmental goals of the coastside and ignores the LCP policies and zoning regulations which speak to having development subordinate to the existing character of the property. The proposal alters and develops over 90 percent of the property.

We encourage the Planning Commission to uphold the intent and letter of the County's zoning regulations and find that the proposal is unacceptable.

The following is a summary of the findings of the Midcoast Community Council with respect to the Mirada Beach Park concept plan. Since the applicant's representative has frequently noted the potential for litigation, attached is a copy of the complete findings of the Council.

1. The project fails to comply with the Resource Management/Coastal Zone district

regulations and LCP policies.

The density credit formula contained in the zoning code would require at least 36 density credits for this project, whereas the subject properties qualify for only 2 density credits. The applicant's arguments that the LCP is silent on the density credit formula in urban areas falsely assumes that the Board of Supervisors is unable to establish zoning regulations based on such factors as resource constraints unless such standards are in the LCP as well. This rationale would result in over 400 acres of coastal land zoned RM/CZ having no intensity limits.

The project also fails to address the design standards and environmental protection criteria contained in the RM/CZ district and the LCP. The project will replace existing views of the entire Half Moon Bay coastline and Pillar Point from Highway 1 with views of RVs and structures. No other property provides such public views from Highway 1. The project ignores the past erosion rates on the coastal parcel which averages 5.4 feet per year. In 50 years only half of the coastal parcel would remain unless bluff protection is installed which is precluded by the LCP. The project would not be subordinate to the existing character of the property since it proposes to grade virtually the entire property and to place surfaced parking on approximately half of the site. The expansion of coastside water and sewer facilities did not account for the intensity of the proposed project. Lacking planned capacity, the project would preclude availability of water and sewer capacity to other projects which comply with zoning intensity limits.

2. The use of the site for the proposal is inappropriate, given its surrounding uses.

The inland parcel is adjacent to a single family neighborhood and an elementary school. The noise, odors and air quality impacts of late evening campsite use and campfires would adversely affect nearby homeowners. The proposed golf driving range would require a fence approximately twice as tall as any structures in the neighborhood and possibly taller than any structure on the coastside. Night lighting of the driving range would also have an adverse impact on nearby residents. There is incompatibility with the adjacent school use from a transient visitor population due to potential for crime or abduction involving the school children.

3. The applicant has failed to provide required information.

The applicant has not provided the Site Stability evaluation required by Policy 9.8(b) of the LCP or the alternative non-ocean shoreline site evaluation required by Section 6913.5(c)(2) of the RM/CZ zoning district.

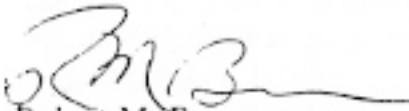
4. Alternative uses of the site in compliance with the RM/CZ district and LCP policies would be preferable to the proposed project and would constitute a reasonable use of the private property.

The RM/CZ district provides for 26 allowable uses, many of which would be preferable to the proposed project. Agricultural use, nurseries and greenhouses, livestock raising, dairies, dog breeding facilities, single family residences, schools, public or private clubs, public recreational facilities, commercial recreation facilities including an RV or tent

camping facility, home occupations, wineries, exotic animal preserve, cemetery and roadstand for produce sales, if conducted at an intensity consistent with the limits imposed by the RM/CZ district, would all be more acceptable than the proposed project.

We appreciate your time and consideration of this important issue.

Sincerely,



Robert M. Brown
Land Use Subcommittee

cc: Board of Supervisors

Terry Burnes

Diane Regonini

Applicant

Jim Marsh

2000-2001: The calculations contained in the RM/CZ zoning regulations, Policy 15(b), indicate that in urban areas, residential lots must be subdivided into lots of at least 10,000 square feet.

FINDINGS OF THE MIDCOAST COMMUNITY COUNCIL IN OPPOSITION TO THE MIRADA BEACH PARK CONCEPT PLAN

1. Lack of Compliance with the RM/CZ Zoning Regulations.

The RM/CZ district establishes restrictions on the maximum intensity of development to "ensure that development is consistent with levels of services which reasonably can be provided, will conserve natural features and scenic values, and that areas hazardous to development or life are left in open or limited use" (emphasis added) [Section 6904]. The code further provides that the "provisions are maximum limits and, where applicable, more restrictive requirements imposed by the application of review criteria" are permitted.

The zoning code is quite clear that development intensity is limited by a system of density credits which equate to water use. Commercial Recreation uses are limited to 630 gallons of water per day. The proposed Mirada Beach Park project would require a minimum 36 density credits, which does not even include the credits necessary for the driving range and the pro shop. The proposed intensity of the project exceeds the zoning code allowances more than 20 times.

The applicant contends that the LCP does not subject projects in urban settings to the density credit/water use calculations contained in the RM/CZ zoning regulations. Policy 1.5(b) indicates that in urban areas, conditional uses such as commercial recreation are subject to density credits, and refers to tables which provide the means of computing the density credits allowed for various uses. Further, Policy 11.15(b) indicates that commercial recreation in rural settings is limited to 630 gallons per density credit, but is silent on the equation for urban settings. By the LCP's silence on a specific density credit/water ratio in urban areas, the applicant is in effect arguing that the County Board of Supervisors were not allowed to subsequently adopt identical density credit formulas for the urban and rural areas based on inadequate water resources. This means that zoning regulations may not be adopted unless based on specific standards in a general plan or coastal plan, which is absurd. The applicant's argument also renders the extensive rationale in the LCP to compute allowable density credits moot, since density credits would not be utilized to establish limits on intensity of development. It would also result in over 400 acres of RM/CZ zoned property on the coast to have no building intensity limits, which is also ridiculous.

2. Lack of Compliance with the RM/CZ Development Review Criteria.

Beyond the obvious lack of compliance with intensity limits, the project also fails to comply with several of the Development Review Criteria of the RM/CZ district (Chapter 36A.2):

Site Design Criteria (Section 6912.2):

(a) "Development shall be located, sited and design to carefully fit its environment so that its presence is subordinate to the pre-existing character of the site and its surrounding is maintained to the maximum extent practicable."

anticipated development.

Ocean Shoreline Criteria (Section 6913.5)

(c) "The applicant shall demonstrate that reasonable alternative non-ocean shoreline sites are not available or suitable for the development, and that the proposed development will not cause significant harm to:

2. the natural beauty of the area, including views from public places, roads, and trails."

The applicant has provided no information regarding alternative sites, despite the large amounts of undeveloped land which exists in the County and in the adjoining City of Half Moon Bay.

As noted above, the project's disruption of existing views of the Half Moon Bay shoreline and Pillar Point from Highway 1 constitutes a significant public loss.

3. **Lack of Compliance with LCP Policies.**

Policy 2.6: "Limit development or expansion of public works facilities to a capacity which does not exceed that needed to serve buildout of the Local Coastal Program."

As discussed above, neither the proposed expansions of the Coastside County Water District nor the Sewer Authority Mid-Coast anticipated the proposed development which exceeds the density credit/water use formulas of the RM/CZ district.

Policy 8.5: "Minimize the number of structures located in open fields and grassland areas; require that structures be designed in scale with the rural character of the region, and that they be clustered near existing natural or man-made vertical features."

The proposed golf driving range will require fencing of a minimum height of 40 feet to protect adjacent recreational and residential areas. Such fencing will clearly be out of scale with the heights of surrounding improvements which are at most two story structures, approximately 20 feet, in height.

Policy 9.8: (a) "Permit bluff and cliff top development only if design and setback provisions are adequate to assure stability and structural integrity for the expected economic life span of the development (at least 50 years)..."

(b) "Require the submittal of a site stability evaluation report for an areas of stability demonstration prepared by a soils engineer or a certified engineering geologist...based on an on-site evaluation..."

(d) "Prohibit land divisions or new structures that would require the need for bluff protection work."

Virtually the entire site is proposed for development, with over 50% of the land area devoted to surfaced parking areas. The only areas to be landscaped are narrow bands within setback areas, an area devoted to tent camping, and the driving range. The entire site will be graded and altered. As a result, none of the existing character of the site, which is a coastal grassland bluff and inland pasture, will remain.

(c) "Small, separate parking areas are preferred to single large parking lots."

Three quarters of the coastal parcel and one third of the inland parcel are parking lots. One parking lot contains 195 oversized RV parking spaces and is 8.25 acres in size, another public lot contains 120 auto spaces, 1.6 acres in size. The inland parcel has a parking lot for 68 oversized RV spaces (3.2 acres in size) and approximately 50 auto spaces (.5 acres). This does not constitute small parking areas.

(d) "No use, development or alteration shall...(2) substantially detract from the scenic and visual quality of the County..."

The coastal parcel offers the only unrestricted views of the entirety of Half Moon Bay and of the harbor and Pillar Point from Highway 1. These views constitute a county-wide and even a state-wide resource. The proposed project will eliminate these views from the Highway. Virtually the entire site will be developed. The small proposed "view way" – 200 feet wide on a site having a highway frontage of over 2,600 feet, offers no views of the Bay coast or of the harbor/Pillar Point. What little view corridor is provided would be disrupted by tents and landscaping. The applicant's argument that an existing earth berm obscures views from Highway 1 is applicable to only 900 linear feet of the 2,600 foot highway frontage.

Primary Scenic Resources Areas Criteria (Section 6913.1):

(a) "Public views within and from Scenic Corridors shall be protected and enhanced, and development shall not be allowed to significantly obscure, detract from, or negatively affect the quality of these views."

Views from the Highway 1 Scenic Corridor, as discussed above, would be significantly affected by the proposed project. Instead of the unrestricted views of the Half Moon Bay coast or of Pillar Point and its harbor, the views along 92 percent of the highway frontage will be of sunsets over Winebagos, parked vehicles and various buildings.

Utilities (Section 6912.3)

(c) "There must be either a public water supply available or the existence of an adequate local water supply must be demonstrated."

The planned expansions of the Coastside County Water District and the Sewer Authority Mid-Coast did not account for the proposed development, and will therefore be undersized in their final capacities to accommodate the proposed project and other

Studies of erosion on the subject property conducted between 1959 and 1983 (see attached listing) indicate that the site has eroded between 130 and 135 feet, an average of 5.4 feet per year. At similar rates, over one half of the coastal parcel will disappear within the required 50 year evaluation period. The project as proposed would require bluff protection, which is precluded by subsection (d) of this policy.

To date, the applicant has not submitted the site stability evaluation required by subsection (b) of this policy.

Policy 11.4: "Permit...in the Coast Zone...(2) commercial recreation and public recreation facilities which (a) are designed to enhance public opportunities for coastal recreation, (b) do not substantially alter the natural environment, and (c) do not subvert the unique small town, rural character of the individual communities on the Coastside.:

As discussed above, the proposed project grades virtually the entire 36 acre site, devotes over half of the site to surfaced parking areas, creates a large, fenced driving range which would likely be the tallest structure within the unincorporated coastside, and eliminates all rural aspects of the site.

4. Lack of Compatibility with Adjacent Land Uses.

The project proposed for the inland parcel is inappropriate given its location adjacent to a single family neighborhood and an elementary school. The RV camping will result in late evening noise and the odors and air quality impacts of campfires which will have adverse impacts on surrounding residents. The golf driving range will require tall fencing and, most likely, evening lighting, which will obscure ocean views of existing residents and create glare impacts. Lastly, the creation of a transient camping population next to an elementary school site has raised concerns by educators and social specialists over the potential for crime/abduction associated with the school children.

5. Safety Concerns.

The project design locates 68 RV campsites on the east side of Highway 1 with the social services for the campers (swimming pool, social building, convenience store and restaurant) on the west side of the highway. There are no provisions for the safe crossing of Highway 1, unless campers choose to walk over 1/2 mile to the proposed new intersection on Highway 1 (which has not received favorable consideration by Caltrans). More likely, campers would choose the most direct route to the coastal parcel, crossing Highway 1 at the entrance to the inland parcel. Given the traffic volumes and speeds on Highway 1, such a situation would be extremely dangerous.

Citations of Bluff Erosion Studies done at El Granada Beach

Note: The [•] indicates information provided to Diane Regonini (2/10/92).

The best detailed source is

- Mathieson, S.A. and Lajoie, K.R.. 1984 (unpublished). "Measurement of Coastal Erosion between 1861 and 1983, El Granada and Princeton-by-the-Sea, San Mateo County, California." [Note: Conditions apply to the use of this informatioun. San Mateo County must contact Ken Lajoie at the USGS, Menlo Park, through the county geologist only. No public use may be made of this information, other than in public hearings unless approved by Ken Lajoie first.]

The most useful current published source is

- Lajoie, Kenneth R. and Mathieson, Scott A. "San Francisco to Año Nuevo" in *Living With the California Coast*, Griggs, Gary and Savoy, Lauret, eds. Duke University Press. 1985.

Other useful USGS sources are

"Bluff erosion rates at El Granada beach from 1861 through 1978."
Maps and charts prepared by John C. Tinsley in 1972 and 1979. U.S. Geological Survey, Menlo Park.

- Tinsley, John C. 1979. "Coastal Erosion at Mirada Rd., El Granada Beach." in Nilsen, Tor H. and Brabb, Earl E. *Geology of the Santa Cruz Mountains*. U.S. Geological Survey, Menlo Park.

- Tinsley, John C. 1972. "Sea Cliff Retreat as a Measure of Coastal Erosion. San Mateo County, California." in *Friends of the Pleistocene Field Trip Guide Book*. U.S. Geological Survey, Menlo Park.

- Destruction of Mirada Road along El Granada bluffs. 1970's.
Series of photographs. Ken Lajoie, U.S.G.S. Menlo Park.

General sources are

- Petit, Charles. July 1, 1989. "Report on Coast Warns of Erosion." *San Francisco Chronicle*.

Winter storm action on El Granada and Miramar bluffs, 1982, 1983.
Photos from *Half Moon Bay Review*.

Mirada Road, El Granada Beach and Miramar Beach bluffs today.
Photos taken by Barbara VanderWerf 1989-1992.