

MIDCOAST COMMUNITY COUNCIL

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

February 18, 1993

San Mateo County Planning Commission
County Government Center
401 Marshall Street
Redwood City, CA 94063

Re: Transfer of Rural Density Credits

Members of the Commission:

At its meeting of February 10, 1993, the MidCoast Council discussed the proposed program expansions for transfer of density credits within the rural area. The Council unanimously agreed that the benefits of the program as proposed are very limited compared with the potential for abuse and negative impacts. The proposed program is very broad in its application and will certainly create a new speculative market for land development, but lacks adequate safeguards and understanding of potential consequences.

Although the Council was involved very late in the process, we have the following specific comments and questions:

1. One of the principle benefits and defining characteristics of the rural area of the Coastside is that development is dispersed. The proposal would likely result in concentration of development which, while this may be appropriate in the urban area, is not appropriate in the rural area.
2. We take exception with statements that the proposal will not increase development. While the theoretical level of development based on numbers of density credits would not change, in reality the environmental constraints which exist on the sending parcels would certainly limit full development.
3. We are concerned based on the input of State Parks, M.R.O.S.D. and P.O.S.T. that the program would result in higher land values on marginally developable parcels, which would in turn limit the potential for open space acquisition.
4. An example of the broadness of the proposed program is that if any portion of a sending parcel has an environmental constraint, density credits from the entire site may be transferred. If the basic goal of the program is to allow some compensation for properties which are truly undevelopable, the program should be tailored to this goal.
5. Another example of the broad results of the proposal going beyond what are otherwise laudable goals is the bonus for affordable housing. The rural area is appropriate for the location of farm labor housing close to such employment,

but other types of affordable housing should be located close to urban type services.

6. If such a program were to be approved, applications for transfers should be reviewed at a level beyond the Zoning Hearing Officer, and much better criteria are needed to define appropriate locations for transferred development rights.
7. We agree with requests for an EIR which would assess potential impacts of the proposed program, including a mapping of the locations of existing density credits and likely sending and receiving sites. An EIR must also consider the cumulative impacts of such a program, particularly on available infrastructure. As noted in previous letters, it is apparent that traffic capacity on the coastside does not exist for anticipated build out.

In addition to the Council, there are other interest groups whose input should be solicited, including the Pescadero MAC, local utility providers and special districts. If this proposal is to be pursued beyond the concept stage, we would request greater involvement of the MidCoast Community Council and the other affected agencies, and responses to the issues raised above. Unless the benefits of the program to the coastside can be better articulated, and considering the need for substantial additional staff study and cost, we recommend that this concept not be pursued.

Sincerely,

Nadia Bledsoe
Nadia Bledsoe
Chairman

cc: Board of Supervisors
Lennie Roberts
Mary Hobbs