

CALIFORNIA COASTAL COMMISSION

NORTH CENTRAL COAST DISTRICT OFFICE
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June 30, 2015

Summer Burlison, Project Planner
County of San Mateo – Planning and Building Department
455 County Center, 2nd Floor
Redwood City, CA 94063-1665

RE: PRE2015-00029 (Paul Cole, Coastside Fire), APN047-261-030

Dear Ms. Burlison:

Thank you for the County's Planning Permit Application Referral for PRE2015-00029 that we received on June 5, 2015. We appreciate the opportunity to comment on the Coastside County Fire Protection's proposal to construct a 10,000-sq.-ft., single-story, fire station with 18 parking spaces located on a vacant 2.5-acre (108,900 square-foot) parcel located at Obispo Road and Avenue Alhambra in El Granada. The proposed project is for replacement of the existing 4,000-sq.-ft. facility located at 531 Obispo Road. The proposed project raises concerns with respect to coastal resource issues that include, visual, biological (sensitive habitat and species), and land use. Our comments are provided below.

Jurisdiction

The proposed project site is located within the Coastal Zone, east of Highway 1 in the community of El Granada. The proposed project would potentially be conducted within 100 feet of a stream, a sensitive coastal resource area, and is not a principally-permitted use. Therefore, the proposed project is appealable to the Commission.

Permitted Use and Future Land Use

The area is located in the Coastal Zone within the El Granada Gateway District (EG) zone; therefore development must adhere to applicable regulations contained in Chapter 12.6 of the certified Local Coastal Program (LCP) zoning regulations. The proposed fire station is not included in the list of permitted uses allowed to locate in the EG district as provided in Section 6229.3. Section 6500(b) allows for the issuance of a use permit for the location of, among other things, public service uses or public buildings in any district when found to be necessary for the public health, safety, convenience, or welfare. Under this section, thus, the relocated fire house may be an allowable use. However, Section 6500(f) requires that approved uses shall be consistent with all the policies and standards of the LCP, and the proposed relocation is not consistent (see additional comments below).

Re-alignment of Highway 1 is a permitted use under Section 6229.3 in the EG district. Caltrans is currently required to consider future re-alignment of Highway 1 in close proximity to the proposed project area as an option to address erosion problems along the coast, particularly at

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Surfer's Beach located westerly of the proposed project site. Looking ahead it would be prudent to locate a new facility where it can remain in place for the long-term. A facility at the proposed project site may potentially conflict with future plans to re-locate Highway 1 further inland. We respectfully suggest that Coastside County Fire Protection consider alternative locations for the replacement fire station that will not conflict with the need to re-align Highway 1 or any other assets due to sea-level rise and or erosion of the coast in proximity to the project area.

Development Criteria and Standards

Section 6229.4 provides development criteria and standards for the EG zoning district. All new development must meet the criteria and standards therein that include a 3.5-acre minimal parcel size, 16-foot maximum building height, and a maximum of 10% coverage of the parcel. The proposed fire station would be: 1) constructed on a 2.5-acre parcel, 2) 30 feet in height, and 3) 10,000 square feet (that exceeds the required 10% maximum parcel coverage), inconsistent with the LCP requirements.

Biological

There is a drainage area with riparian habitat located in the central portion of the undeveloped parcel. This drainage and habitat are to the west of the area where the fire station is proposed for construction. The referral, however, indicates that the entire project site and surrounding area is flagged as possible monarch butterfly and San Francisco garter snake habitat. Approximately six to nine mature trees would be removed as part of the project. LCP Policy 7.1 defines sensitive habitats as any area in which plant or animal life or their habitats are either rare or especially valuable and any area that contains or supports rare and endangered species (as defined by the California Department of Fish and Wildlife). Sensitive Habitats are protected by the provisions of LCP Policy 7.3 that prohibits any land use or development that would result in a significant, adverse, impact on sensitive habitat areas. Policy 7.3 requires that development in areas adjacent to sensitive habitat shall be sited and designed to prevent impacts that could significantly degrade the sensitive habitat. The proposed use must also be compatible with maintenance of the biologic productivity of the resource/habitat, as required by Policy 7.3. Policy 7.4 permits only resource-dependent uses in sensitive habitats. LCP Policy 7.36 requires that development be prevented from occurring where it is known to be a riparian location for San Francisco garter snake. The proposed development is a facility for fire protection purposes and it could potentially interfere with maintenance of the riparian habitat and result in an adverse impact on these San Francisco garter snake and monarch butterfly. The impacts of the proposed fire station on sensitive habitats must be fully evaluated; and the project must be designed consistent with LCP policies 7.1, 7.3, 7.4, and 7.36 that protect sensitive habitats. We suggest that the applicant have a qualified biologist survey the biological resources on the parcel and an assessment of habitats. Based upon the results applicable LCP policies for riparian corridors and wetlands must be applied to the proposed project. These include riparian policies 7.7, 7.9, 7.10, 7.11, and 7.12. Applicable LCP policies for the protection of wetlands include 7.14, 7.16, 7.17, and 7.18.

Visual

The proposed project site is an undeveloped 108,900 square-foot (2.5-acre parcel) located to the east of State Highway 1 within the Cabrillo Highway/Highway 1 County Scenic Corridor. The proposed project includes grading of the site comprising excavation of 4,300 cubic yards of

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material and 2,300 cubic yards of fill. The proposed project would result in the removal of six to nine mature trees. LCP Policy 8.5 requires that development on urban parcels larger than 20,000 square feet be located on a portion of the parcel that is least visible from State and County Scenic Roads. The LCP requires that proposed development best preserve the visual and open space qualities of the parcel overall. LCP Policy 8.9 requires that new development be located and designed to minimize tree removal. LCP Policy 8.13 sets design guidelines for coastal communities that include El Granada. Policy 8.13 requires that structures be designed such that the proposed construction does not require extensive cutting, grading, or filling. LCP Policy 8.32 requires that the design criteria of the Community Design Manual be applied to development including the design guidelines for El Granada. The proposed project must be consistent with the LCP policies 8.5, 8.9, 8.13, and 8.32 that protect visual resources within the Coastal Zone.

We support the County's plan to replace its obsolete fire station with a new, modern one; however the proposed location presents inconsistencies with the requirements of the certified LCP. Above all the proposed project raises concerns as it may potentially conflict with the need to re-locate Highway 1 further inland in order to protect coastal access in this area. We encourage Coastside County Fire Protection to identify alternative sites for a new fire station and are available to review those locations and provide comments.

Please feel free to contact me via e-mail at rananda@coastal.ca.gov or call me at 415-904-5292 if you have questions regarding our comments.

Sincerely,



Renée Ananda, Coastal Program Analyst
Coastal Commission
North Central Coast District