

CALIFORNIA COASTAL COMMISSION

45 FREMONT, SUITE 2100  
SAN FRANCISCO, CA 94105-2219  
VOICE AND TDD (415) 994-5200  
FAX (415) 994-5400



JAN 2002  
PLANNING  
HALF MOON B...

January 25, 2002

The Board of Harbor Commissioners  
San Mateo County Harbor District  
One Johnson Pier  
P.O. Box 39  
El Granada, CA 94018

**RE: Proposed Amendment to District Ordinance Code Section 3.8.2, Overnight Stays at Recreational Vehicle Facilities**

Honorable Commissioners:

We have received notice that your Board will be considering an amendment to District Ordinance Code Section 3.8.2, regulating the length of overnight stays at recreational vehicle (RV) facilities within the Harbor District's jurisdiction, at its February 6, 2002 meeting. This letter offers the Coastal Commission staff's comments to the proposed change.

Section 3.8.2 of the Ordinance currently provides: "No vehicle shall be allowed to stay overnight for more than fourteen (14) consecutive days, or more than thirty (30) days in any one calendar year." This language was originally adopted by the Harbor District in July 1987 under Ordinance 63, which was subsequently superseded by Section 3.8 in June 1996. Under the proposed amendment, Section 3.8.2 would be changed to read: "No vehicle shall be allowed to stay overnight for more than ninety (90) consecutive days."

The proposed amendment predominantly affects lengths of overnight stays at the Pillar Point Harbor RV Park located in the City of Half Moon Bay near El Granada. We understand that the Pillar Point RV Park has been operating under a Use Permit from the City of Half Moon Bay which was renewed in May 1987. Because any change in length of permissible overnight stays at the RV Park is a change in intensity of use, any such change would require a Coastal Development Permit or permit amendment from the City of Half Moon Bay.

In Commission staff's view, a rule permitting overnights stays of 90 consecutive days with no annual maximum limit is inconsistent with the public access and recreation policies of the Coastal Act and the certified Local Coastal Program of the City of Half Moon Bay, as they have been interpreted by the Coastal Commission. The public access and recreation policies are designed to maximize coastal access by the public. RV facilities such as the Pillar Point RV Park provide low-cost overnight accommodation and fulfill an important visitor-serving function. An overnight stay rule for coastal RV facilities which allows certain members of the public to stay for long or unlimited periods has the effect of limiting access to coastal resources to others. In the past, the Coastal Commission's interpretation of the Coastal Act public access and

recreation policies in similar instances has typically been that overnight stays should be limited to a maximum of 30-days per year at a given facility.

Please call me at (415) 904-5268 if you have any questions regarding these comments.

Sincerely yours,



Peter T. Imhof  
Coastal Planner  
North Central Coast District

cc: Peter Grenell, General Manager, SMCHD  
Ken Curtis, Planning Director, City of Half Moon Bay  
Sandy Emerson  
Linda Locklin, Director of Public Access