

**CALIFORNIA COASTAL COMMISSION**

NORTH CENTRAL COAST DISTRICT OFFICE  
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**August 3, 2017**

Mr. Michael Schaller  
San Mateo County  
Planning and Building Department  
455 County Center, 2<sup>nd</sup> Floor  
Mail Drop PLN122  
Redwood City, CA 94063

**RE: Major Development Pre-Application (Andrew Bielak (MidPen Housing))  
PRE2017-00032 (APN 037-022-070)**

Dear Mr. Schaller,

We received San Mateo County's project referral, dated July 18, 2017 and received in our North Central Coast District office on July 20, 2017, for the above-referenced Major Development pre-application. The proposed project is a new, affordable housing development in Moss Beach located at 1993 Carlos Street. The site is on an approximately 11-acre (10.875-acre) parcel currently zoned as PUD-124. The proposed project is for the construction of a community that includes a total of 71 units (16 1-BR, 37-2BR, and 18 3-BR). This community comprises two-story and one-story structures and dedicated open space and walking trails (as shown on the *Preliminary Site Plan* included with the referral). The proposed project would require a Coastal Development Permit (CDP) and re-zoning. The following are our preliminary comments.

The certified Local Coastal Program (LCP) provides that the purpose of the PUD-124 zoning is specifically to govern the use and development of the subject parcel for a residential complex for affordable and market rate housing. PUD-124 provides an approved Development Plan for the subject parcel. The LCP requires that all development be in conformity with the development plans for the property as approved by the Planning Commission on October 9, 1985, and by the Board of Supervisors on March 11, 1986. We recommend that the County evaluate the proposed project's consistency with the LCP, as the authorized use of the site is for residential development and related parking facilities for affordable and market-rate housing as defined in Policies 3.19, 3.28, and 3.29 of the LCP; and recreational uses for residents of the housing complex as specified by the PUD-124 zoning designation.

We recommend that the proposed project be evaluated for consistency with the requirements for the PUD District, particularly Section 6191 (Review and Findings). LCP Section 6191 for PUDs requires that PUDs not be detrimental to the character and the social and economic stability of an area and its environs. The LCP also requires that PUDs be in harmony with the zoning in any adjoining unincorporated area and that no interference with existing or prospective traffic movements on highways results from the PUD. The PUD must not result in overcrowding of the land or congestion of population. We suggest that the review of the proposed project evaluate its consistency with the required findings provided in LCP Section 6191.

A CDP is required for the proposed project, and as the parcel is zoned Coastal Development (“CD”) it must be consistent with LCP Sections 6328.1 and 6328.4, which requires a CDP for development within the Coastal Zone. LCP Section 6328.1 requires that regulations for CD districts be applied in addition to the regulations of the underlying zoning/district, in this case the PUD-124. We suggest that the analysis address the proposed project’s consistency with LCP policies for Locating and Planning New Development including LCP Policy 1.19 (Ensure Adequate Public Services and Infrastructure for New Development in Urban Areas), and 1.23 (Timing of New Development). LCP Policy 1.19 requires that no CDP for development in the urban area be approved unless it can be demonstrated that the development will be served with adequate water supplies and wastewater treatment facilities. We recommend that you analyze the proposed project for consistency with the subsections of LCP Policy 1.19 in order to ensure adequacy of a water supply and wastewater treatment for this residential use. LCP Policy 1.23 is to ensure that roads, utilities, schools and other public works facilities and community infrastructure are not overburdened by rapid residential growth. LCP Policy 1.23 also addresses the limits of new dwelling units built in the urban Midcoast. It allows for building permits to be issued for affordable housing even if the number of issued building permits for any given year has reached the 40-unit maximum required by LCP Policy 1.23a. The proposed affordable housing should be reviewed for compliance with LCP Section 6102.48.6, which defines “affordable” ; and LCP Policy 1.23d(1) that requires such affordable housing to have income and cost/rent restrictions for the life of the development. We suggest that the County analysis include a discussion of the proposed project with respect to build-out and consistency with LCP Policy 1.23.

The subject parcel is currently vacant and located immediately adjacent to land (on APN 037-022-280) located northerly of the parcel zoned open space/rural. LCP Policy 1.6 defines rural areas as those lands suitable for different types of land uses, including residential, which are consistent with maintaining open space (as defined in Section 65560 of the Government Code (as of January 1, 1970)) in order to: (1) preserve natural resources, (2) manage the production of resources, (3) provide outdoor recreation, and (4) protect public health and safety. We recommend that the County discuss the proposed project’s potential to result in impacts to the adjacent area. The proposed project site should be evaluated to determine what biological resources occur on the parcel, including sensitive habitat. The County analysis should identify potential biological resource impacts and proposed measures to avoid, reduce, and mitigate those impacts.

We recommend that the County evaluate the proposed project’s consistency with the policies in the Housing Component of the LCP, including LCP Policies 3.15 and 3.16. LCP Policy 3.15 designates the subject parcel as a potential site for affordable housing; and specifies criteria required in order to develop the subject site for residential use. Development at the subject 11-acre site must assist with meeting LCP housing objectives. The County analysis should include a discussion/review of the proposed project’s consistency with the criteria as provided by LCP Policy 3.15. LCP Policy 3.15 specifies the percentage of units to be reserved for low income and moderate income households. LCP Policy 3.16 provides for the phasing of development of LCP-designated housing sites, which includes the subject Moss Beach parcel. This policy limits the number of affordable housing units that can be developed during any 12-month period in order to allow the affordable housing units constructed on LCP-designated housing sites to be

**Michael Schaller**  
**PLN2017-00032 (Bielak, MidPen Housing)**  
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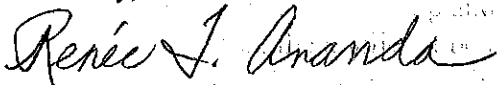
assimilated into the community a few at a time. The proposed project would entail the construction of 71-units. LCP Policy 3.16 provides for the phasing of development of LCP-designated housing sites, which includes the subject Moss Beach parcel, as this policy limits the number of affordable housing units that can be developed during any 12-month period to 60 units. The limit is to allow the affordable housing units constructed on LCP-designated housing sites to be assimilated into the community a few at a time. LCP Policy 3.16, however, allows for increasing the number of affordable housing units permitted if phasing threatens the implementation of affordable housing on an LCP-designated site. We recommend that the review of the proposed project include an analysis and discussion with respect to phasing under the requirements of LCP Policy 3.16a and b.

LCP Policy 3.12 requires that new development providing affordable housing contribute to maintaining a sense of community character by being of compatible scale, size and design. This policy also requires an assessment of negative traffic impacts. LCP Policy 2.52 requires that applicants for new development (except for a single-family dwelling, a second dwelling unit, or a two-family dwelling) in the urban Midcoast that generates any net increase in vehicle trips on Highways 1 and/or 92, to develop and implement a traffic impact analysis and mitigation plan. We recommend that the applicant be required to ensure that the proposed project is in conformity with LCP Policy 2.52. The referral includes a preliminary assessment of traffic impacts, dated June 26, 2017, and prepared by Kittelson and Associates, Inc. Kittelson recommends further coordination with relevant entities regarding mitigation opportunities. We look forward to an opportunity to review the more detailed traffic study, also suggested Kittelson's preliminary assessment.

Finally, because the western portion of the parcel (~1/3 of it) is within a County scenic corridor, we recommend that the analysis of the project address/discuss potential impacts to scenic resources and measures proposed to mitigate those impacts. It should be evaluated for consistency with LCP Policy 8.32 (Regulation of Scenic Corridors in Urban Areas).

Staff is available to answer any additional questions you may have. We look forward to meeting with you, as well, on August 15, 2017 at our North Central Coast District office in San Francisco. Please feel free to call me at 415-904-5292 or contact me via e-mail at [renee.ananda@coastal.ca.gov](mailto:renee.ananda@coastal.ca.gov) if you have questions regarding our comments.

Sincerely,



Renée T. Ananda, Coastal Program Analyst  
North Central Coast District