

June 24, 2015

Ron Stefanick  
Point Pillar Project Developers, LLC  
P.O. Box 158  
Half Moon Bay, CA 94019

Dear Mr. Stefanick:

**SUBJECT:** Summary of County Comments and Comments/Questions Received at a Major Development Pre-Application Project Review Meeting (pursuant to Zoning Regulations Section 6415) held on May 27, 2015 for a 50 space RV park with 7 tent camping spaces, 25 parking spaces, a single-story 832 sq. ft. laundry and restroom facility, with landscape and drainage improvements, necessitating approximately 6,700 total c/y of cut material to be off-hauled from the site, and 3,865 total c/y of imported fill for base rock beneath asphalt, drain rock in detention basins and soil in planting/landscaped areas. This project would occur on a legal (CCR/DR zoned), 3.35 acre vacant parcel (APN 047-081-430) at the corner of Highway 1 and Capistrano Road in Princeton.

County File Number: PRE 2015-00019

Thank you for your participation in the public workshop held on May 27, 2015. The information and comments exchanged were invaluable in fostering understanding of the surrounding community's concerns and comments about the project. The purpose of this letter is to summarize the comments received at the workshop and include additional comments received from the County and other reviewing departments and interested parties.

Beside those representing the project, there were about 35 people in attendance at the meeting (25 of which signed the meeting "Sign-In" sheet).

### **SUMMARY OF PUBLIC COMMENTS IN OPPOSITION TO PROJECT**

Generally speaking, there were far more comments by those who did not support the project than those who did (although not everyone who attended the meeting spoke). Of those who objected to it, there was a strong consensus that the RV facility was simply not an appropriate use on a parcel that is perceived as the "gateway" to the harbor, as supported by the comments listed below:

- The RV facility will detract from views of the harbor, as seen from Cabrillo Highway (and from points to the south, north and east), due to the visual impact of the RV use,



generally or specifically, of seeing the RV rooftops (including associated attached AC units, venting and reception dishes). Such comments included that proposed landscaping would further block harbor views and contribute to the need for more landscaping to better screen the project from view. Generally speaking, comments focused on the fact that a use at that site should be of a type that either posed no visual impact whatsoever to harbor views, or whose development was of a use and height that it did not need landscaping to screen it. Such comments included that this was a terrible idea from a planning/zoning perspective and represented a serious adverse intrusion into the marine and small town aesthetic of the harbor area.

- The RV facility will create additional traffic and hazards (both from vehicles entering and leaving the facility, as well as from RV's having to negotiate turning and positioning into and out of the facility) in an area already highly impacted by traffic, especially on weekends. Such added traffic in this specific area may slow Fire and other Emergency Response vehicles from reaching specific destinations in this area and areas just north and west, through which this is the only or primary access.
- A subsequent email that staff received after the meeting asked if the project restrooms and parking spaces would be available to the public.

*Staff Input:* The applicant responded that they would not be; the restroom/laundry facilities would be only accessible by RV user key lock cards and the parking spaces would be reserved for the RV users' additional vehicles (towed in behind the RVs or used to pull in trailers).

- The applicant's stated 28-day staying limit for visiting RVs will not be enforced by the applicant, nor will violations of such limits be enforced or enforceable by the County. An RV park such as this can easily turn into a "trailer park," which, as a use, is intended generally to accommodate permanent housing (albeit in trailers). To this issue, several people commented on the property owner's lease and management of another RV facility, known as the Surfer's Beach RV Park, located between Cabrillo Highway and the beach, but within the city limits of Half Moon Bay. If the proposed facility eliminated RV hook-ups (for water, waste and/or power), the tendency for RVs to overstay a 28-day limit would be significantly reduced.
- Many cited RVs did not observe such time limits and had remained there for months, turning them into the equivalent of low-income permanent housing units. One person added that this facility's uninterrupted stay limit was 90 days per calendar year. Additionally, the Surfers Beach RV Park restroom facilities were locked, thus not accessible to the public, despite the obvious need for restrooms.

*Staff Input:* This facility is on property owned by the County Harbor District and had been operated as a broadly purposed "day use only" parking lot with public restrooms for decades. In 1999, the property was leased to Mr. Nerhan. While the private leasing of the RV facility triggered the need to obtain a Use Permit from Half Moon Bay, a Coastal Development Permit was evidently not required. Allegations were shared at the Pre-Application meeting



*about how generally this RV facility is not being operated according to the rules of the lease. In addition, an emailed copy of a Midcoast Community Council letter, dated January 28, 2015, sent to the Harbor District Board of Commissioners, speaks to issues around impacted harbor views from overgrown trees and shrubs, high parking fees discouraging the public's "day use" of the parking lot (in conflict with lease terms as well as with City of Half Moon Bay and Coastal Commission goals), closure of the public restroom, and light pollution.*

- The type of people that such facilities would attract (regardless of the enforced length of stay, but more so if the RVs ended up staying for indefinite periods) may include visitors that treated coastal resources with less respect, more frequently visited liquor stores and bars, thus contributing to alcohol-related crime.
- Any trees added as part of the landscaping shall not be allowed to reach higher than 15 ft. to 18 ft. The Monterey cypress should not be included.
- If something were to be built on the property, a park, coastside history museum or interpretive center would be a better choice. One person asked why it could not remain to be used as it has in the past - as a venue for selling pumpkins, farmers market, fairs and other multi-purpose events. Another comment suggested a community park. Another suggested that the Peninsula Open Space Trust may be interested in acquiring the parcel. An email received suggested a movie theater or bowling alley - something available to the local residents.
- This would have been a good location for the relocated Coastside Fire Station.

*Staff Input: The relocated Coastside Fire Station is currently proposed to occur on Obispo Road, El Granada (APN 047-261-030). The Major Development Pre-Application meeting for that project is to be combined with an environmental scoping session presented by the Coastside Fire's consultant. County staff will be there to explain the project application requirements and process, once a formal application is submitted. That meeting is scheduled for July 16, 2015 (7:00 p.m. - 8:30 p.m.) at the El Granada Elementary School (auditorium).*

- Lighting of the RV park will create more visual obstruction and glare from surrounding view points.
- An RV park, despite bringing money and business to the local business merchants, provides nothing for the local coastside residents themselves.
- Overflow from RV users who find that this facility (or other RV park) is full, end up parking their RVs and/or associated vehicles anywhere they can find, including along the streets in El Granada.
- This RV park, with 50 RV spaces, will potentially take up 50 Coastside County Water District (CCWD) water connections from other parcels in the area which do not yet have such connections.

*Staff Input:* Staff's discussion with CCWD on this issue confirmed that, if approved, CCWD would not be issuing 50 separate connections to the RV park facility. Instead, they would issue (upon purchase) a single water connection with a delivery (pipe) connection of ample diameter to supply the water needs as calculated from the use (as referenced by their specific comments summarized under Other Reviewing Agencies in this letter). Additionally, the water that CCWD has available would be "Priority Connections," which are reserved for "Commercial Recreation" uses, which an RV park use would be considered.

- An RV park at this location would represent the continued development trend that is ruining the small town charm of the mid-coast and harbor area, already adversely affected by past development, including the adjacent, "out-of-scale" Oceana Hotel.

### **SUMMARY OF PUBLIC COMMENTS IN SUPPORT OF THE PROJECT**

- The subject RV park would serve a growing recreational market comprised of those who use RVs to travel in, including retirees, couples, and families. Additionally, the mid-coast area is in need of additional RV park facilities. Given the general and current cost of RVs themselves, these RVs do not represent the type of recreational vehicle that would sit indefinitely (turning into semi-permanent housing); they are primarily used by those who travel for recreation, seek such facilities to park in, then move on to the next available facility. RV users bring business and spend money in the places they travel to and stay at.
- The RVs themselves sit approximately 8 ft. to 10 ft. high. Given that the proposed park surface is generally lower than the Cabrillo Highway vantage point, the RVs themselves would not block views. Another comment suggested is that the subject property actually sits lower than the Cabrillo Highway road surface, meaning that the RVs would not likely pose obstructions to views towards the harbor.
- RV facilities, such as that proposed, are indispensable for visiting fishermen and others associated with harbor boating and similar uses. Not all such users have the desire, need or funds to stay at a hotel or motel in the immediate area.
- There is no necessary connection between how the Surfers Beach RV facility is run and how this proposed RV park would be operated, pursuant to its description, scope and conditions of approval, that would be attached with any approval.
- The applicant submitted a petition supporting the RV Park project, stating that it would "serve the harbor and Princeton area and visitors to the coast." It was signed by 134 individuals, all of whom identified themselves as "Half Moon Bay businessmen and residents."



## **COMMENTS FROM OTHER REVIEWING AGENCIES**

To date, staff has received tentative comments from the following agencies:

### **County Planning Department**

#### **Project Plans Compliance with Coastside Commercial Recreation/Design Review (CCR/DR) Zoning District Regulations:**

- County Planning acknowledges that the proposed project falls within the "Recreation Areas" use definition of the CCR District, which states: "Outdoor areas used for a variety of outdoor recreational purposes, including areas that will provide for public use of natural and manmade water features, as well as for special recreation activities." Like all uses listed in the CCR District, a Use Permit is required.
- Upon a preliminary review against the CCR District Regulations, the project appears to comply with standards/policies around "Coastal Access" (it is not applicable due to its location), "Building Height Limit" (the single proposed building at 16' 7" is far less than the 36 ft. height limit), "Lot Coverage" (coverage of permanent structures 18" or higher is far less than the 50% allowed maximum), and "Yards" (the building's proposed to have 6' setbacks where 5' is the minimum required). However, "Protection of Coastal Resources" includes the requirement: "Development shall be located and designed so as to provide maximum feasible protection to coastal resources, including, but not limited to, marine views..." "Siting" states: "Structures and parking areas must be sited in a manner which maximizes public view of, and access to, the shoreline or ocean." While "Impervious Surface Area" seeks to limit the amount of parcel area covered by impervious structures (less than 18" in height) to 10% of parcel size, the Community Development Director can grant exceptions (as would be necessary in this case due to the high amount of asphaltic parking surfaces) when adequate on-site stormwater drainage facilities are included in the project. In this case, the applicant has already submitted such a plan that has been preliminarily reviewed by the Department of Public Works. "Landscaping" may need to be adjusted pursuant to Planning's comments below. Finally, under "Performance Standards," critical issues that will come under strict review will include: Lighting (discussed in a comment below), Odor (i.e., the limitation on RVs' engines idling, the use of outdoor barbeques), Noise (facility-generated noise limited after certain hours), and Trash and Storage (the plans do not appear to show the required 6' high wall enclosure for screening purposes).
- The additional application requirements listed below, as well as the project's compliance with all applicable zoning, General Plan and LCP policies, will contribute toward Planning staff's subsequent recommendation to the Planning Commission regarding the project decision. However, it should be noted that idea of an RV park at this location will be highly contingent upon two very subjective issues: 1) an allowed use (even with a Use Permit) that is consistent with the goals of the CCR District, and 2) the required CCR Use Permit findings, which include: "that the establishment, maintenance and/or conducting of the use will not, under the circumstances of the particular case, result in a

significant adverse impact to coastal resources, or be detrimental to the public welfare or injurious to property or improvements in said neighborhood.”

- Should the applicant move forward with an application for the project as proposed, the required application would include a Coastal Development Permit (CDP), Use Permit, and a Grading Permit.
- The application shall include a traffic study, as prepared by a licensed transportation engineer or consultant. The report shall meet the minimum traffic study criteria as dictated by the County Department of Public Works (DPW), who shall review the study for its adequacy and conclusions.
- The applicant shall submit an arborist report (prepared by a licensed arborist) that assesses the health of the cypress trees located along the property's boundary adjacent to Cabrillo Highway. The report shall indicate tree protection measures to be taken during construction, as well as recommend any trimming or maintenance to ensure their continued health.
- The applicant shall submit photo simulations depicting views of the RV park as seen from at least three locations; generally, these shall include a viewing point from both southbound and northbound Cabrillo Highway as it would look towards the harbor with the RV park in its direct line-of-site, as well as a viewing point from Capistrano Road (at a point west of its intersection with Cabrillo) looking northerly towards the RV park. The photo simulations shall take into consideration two scenarios: 1) that the dense line of cypress trees along the property's boundary adjacent to Cabrillo Highway remain in their current condition, and 2) that the trees are thinned or trimmed, as recommended by an arborist as cited in the previous comment.
- The proposed landscape plan shall be reviewed to ensure that proposed trees are not located or grow to heights such that views to the harbor as seen from Cabrillo Highway would be further obstructed or adversely affected. That said, the landscaping (trees and shrubs) shall be drought-tolerant and located such that they still provide immediate screening of the site development and RVs as seen from points near and far.
- The applicant shall consider relocating or removing the eight RV spaces located closest along the southerly property boundary, adjacent to Capistrano Road in order to reduce the visual impact and obstruction along that side as seen from both Capistrano Road and Cabrillo Highway southbound. This area should be used to create an additional, landscape buffer that would further this goal.
- The applicant shall submit plans for the signage associated with the RV facility; where would it be located; how tall would it be; what is its design?
- The applicant shall submit a lighting plan for the RV park, including the manufacturer's details of all lighting fixtures. The amount and type of lighting shall be minimized for



safety and security purposes only, including low-to-the-ground fixtures where possible (for RV pedestrian users) and down-casting in all cases.

- Will the primary sign for the Oceana Hotel and other harbor businesses (currently located at the corner of Cabrillo Highway and Capistrano Road) be changed or proposed to be relocated due to this project? If so, a plan of its location, height, and design shall be submitted.

### **County Building Inspection Section**

While Building's comments are directed at that point where the project building permit is submitted, they are still provided for preview as follows:

- When this design is submitted for a building permit, there may be more requirements according to the actual design being submitted at that time. This review is neither permission nor approval for final plan check for a permit.
- For the site to be ADA compliant, they will need to provide two cars, two RV spaces, and two camp sites that comply with Accessibility requirements. The plan does not appear to comply with these requirements. Additionally, more detailed measurements would be required for the bathroom and showers.

### **County Geotechnical Engineer**

- This project will require a geotechnical study before either grading or building permits can be issued. A general site conditions report may be required at the time of the cited Planning application.

### **County Department of Public Works**

While the Department of Public Works' comments are directed at that point where the project building permit is submitted, they are still provided for preview as follows:

- Prior to the issuance of the Building Permit, the applicant will be required to provide payment of "roadway mitigation fees" based on the square footage (assessable space) of the proposed building per Ordinance No. 3277.
- No proposed construction work within the CalTrans (Cabrillo Highway) and/or Capistrano Road right-of-ways shall occur until CalTrans County requirements for the issuance of their respective encroachment permits are met and encroachment permits issued.
- The applicant shall submit a permanent stormwater management plan in compliance with the County's Drainage Policy and NPDES requirements for review and approval by the Department of Public Works.

**Coastside County Water District**

- The District confirms that there are no installed or uninstalled water rights assigned to this parcel at this time. The applicant will have to acquire sufficient water capacity for the proposed project.
- Before issuance of a building permit, the District will need to evaluate a complete set of building plans to determine if the water service capacity available is adequate for this development and complies with District regulations.
- Due to the State Governor's Executive Order No. B-26-14 (issued on April 1, 2015), landscaping irrigation on newly constructed homes and buildings that are not delivered by drip or micro-spray is prohibited.

**Granada Community Services District**

- There is a sewer mainline facility within Capistrano Road where the proposed project is located, and the applicant will be required to obtain a sewer permit. To provide more detailed comments regarding the District's area of responsibility, the applicant must submit an off-site sewer plan sheet detailing the proposed connection to the District's wastewater facilities, and provide an estimate on the volume of wastewater proposed to be discharged. It will be important to know if there will be limitations on length of stay and whether a sewage dumping station will be provided on-site. Until this information is available, it is possible that a sewer permit variance will be required.

**Coastside Fire Protection District**

- The bathroom/laundry building will need to be equipped with a fire sprinkler system and its perimeter must be surrounded by well-marked fire lanes.
- A fire hydrant must be located within 250 ft. from the site.
- Other requirements are included (but are not limited to) emergency access to the RV facility, fire alarm system, vegetation management, and fire extinguishers.

**Other Agency Review**

Referrals for this Major Development Pre-Application were also sent to the California Coastal Commission, the Committee for Green Foothills, Midcoast Community Council (MCCC), and the Princeton Citizens Advisory Council. The MCCC could not formally respond due to this meeting conflicting with their scheduled meeting, which they cancelled to allow some members to attend. While no comments were received from these agencies, they will again be notified in the future at such time when the formal application is submitted; such notice will also occur upon circulation of the subsequent environmental document as well as for all public hearing agendas.



Subsequently, however, a member of the MCCC did forward to staff, via email, a MCCC letter sent to the Harbor District (dated January 28, 2015), regarding the Surfers Beach RV Park, as referenced earlier in this letter. This letter helped to clarify some issues that the MCCC had with a similar facility, as well as to shed light on some of its problems relating to its use and operation.

Before submittal of the formal application, including all plans and materials cited earlier in this letter, please consider the comments discussed above. If you have any questions regarding this summary or need assistance with application requirements, please feel free to contact me at 650/363-1837 or by email at: [dholbrook@smcgov.org](mailto:dholbrook@smcgov.org).

Sincerely,

David Holbrook  
Senior Planner

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cc: Board of Supervisors  
Planning Commission  
Steve Monowitz, Community Development Director  
Lisa Aozasa, Acting Deputy Community Development Director  
Planning Director, City of Half Moon Bay  
Midcoast Community Council  
Princeton Citizens Advisory Committee  
California Coastal Commission  
Coastside County Water District  
Coastside Fire Authority  
Granada Community Services District  
County Department of Public Works  
County Building Inspection Section

Meeting Attendees (those who signed the "Sign-In Sheet"):

Collin Tiura	Heather Peters
Bob Candillo	Chris Johnson
Larry Carter	Michael Cassadine
Ann Riegel	Dannel Stefanick
Teri Morrey	Keet Nerhan
Lorraine Curry	Barbara and John Dye
Dan Haggerty	Kim Dailey
Lisa Ketcham	Yuri Daher
Pete Amour	Mike Donegon
Nancy Struck	Dave Olson
Bill Kehoe	Jeff Rogers
David Silveira	