

**CALIFORNIA COASTAL COMMISSION**

NORTH CENTRAL COAST DISTRICT  
45 FREMONT, SUITE 2000  
SAN FRANCISCO, CA 94105-2219  
VOICE AND TDD (415) 904-5260  
FAX (415) 904-5400



March 7, 2005

San Mateo County Board of Supervisors  
Hall of Justice and Records  
400 County Center  
Redwood City, CA 94063

**ATTN: George Bergman**

**RE: Midcoast LCP Update Comments for March 8, 2005 Board Meeting**

Honorable Board Members:

We appreciate the opportunity to provide comment to the County's Midcoast LCP Update project. This letter is to address the specific LCP topics included in the agenda for the March 8, 2005 Board of Supervisors meeting. We have also submitted two other letters dated January 25, 2005 (general concerns) and February 16, 2005 (February 15, 2005 agenda issues).

1. Residential Uses in Non-residential Districts

We strongly support the county's efforts to limit residential units in non-residential districts to reduce residential buildout, increase commercial opportunities, and ease traffic congestion in the Midcoast. While the proposal to prohibit ground floor residences in the commercial, C-1 Zoning District represents a positive step in reducing residential growth and protecting local commercial and employment opportunities, achieving the vision of increased urban vitality and reduced congestion requires a comprehensive plan to address the shortfall between the supply and demand for roadway capacity.

The Countywide Transportation Plan (CCAG, 2001) projects that "the most significant increases in congestion from 1990 to 2010 will occur in the Northern 1 and Western 92 corridors," and states that "in order to achieve the most effective solution for relieving congestion, demand reduction strategies must precede projects which increase supply." Commission staff believes that demand reduction could be accomplished through:

1. Reducing residential growth and buildout level in the Midcoast.
2. Increasing local employment opportunities to reduce congestion generated by work related commute.
3. Increasing neighborhood serving commercial development to reduce vehicle dependency and local vehicle trips.

We realize that the County has made many proposals in this LCP update to improve land use and zoning to achieve the outcomes listed above. However, we believe that more aggressive measures are needed to confront the region's congestion problems. For instance, limiting residential use in non-residential districts could be an effective strategy to reduce total residential growth, however, the County should consider broadening the restrictions instead of only applying it to the C-1 zoning district, which could still result in increases in residential development in other non-residential districts. We suggest that the County consider the following measures to more effectively reduce total residential growth and buildout level:

- Prohibit all new residential development in non-residential districts.
- Prohibit the reestablishment of residential development in non-residential zoning districts that have been legally abandoned.
- Prohibit additions to existing residences in non-residential districts.
- Allow the re-establishment of non-conforming residences in non-residential zones only if the residence were a *legal* non-conforming residence that was destroyed by a disaster as defined by Section 30610(g) of the Coastal Act.
- Amend the zoning code to promote development of neighborhood commercial services within existing residential zones.

## 2. Midcoast Commercial and Employment Opportunities

Commission staff strongly supports the County's efforts to promote business development in the Midcoast and believes that increasing employment opportunities is a vital step in reducing the existing jobs/housing imbalance and decreasing congestion on the overextended highways. In addition to encouraging commercial, retail, office, industrial and other employment generating development, we believe that the equation in balancing jobs and housing must also include reduced residential development. Thus, we suggest that the County consider rezoning undeveloped residential areas to non-residential and/or mixed use zoning districts. Furthermore, to reduce vehicle dependency and non-commute related traffic, the County should consider rezoning existing residential districts to mixed-use and encourage neighborhood serving commercial developments to reduce local vehicle trips.

## 3. Airport Overlay Zone

The reasoning behind the County's proposal to change the Airport Overlay Zone is unclear. The staff report states that:

*“To reduce safety risks from aircraft new Half Moon Bay airport, the AO district regulations control the size and intensity of development otherwise permitted by zoning. The AO regulations prohibit residential development and limit site intensity to three persons per parcel.”*

The proposed reduction to the Airport Overlay Zone to permit residential development and to increase the density and intensity of development in this area appears to contradict the goal of reducing congestion. The County should provide an analysis of how the zoning amendment

would change the density and intensity of use and describe the site-specific development potential and constraints of the specific parcels that would be affected by the proposed change to the AO Zone. Any proposal to rezone this area to provide for increased development must be supported by an analysis of the resulting public safety, coastal resource, and public access impacts. The analysis should address how any increases in density and intensity of the permitted land use would be consistent with the public safety, public access, open space, sensitive habitat, wetland, and visual resources policies of the certified LCP, and how development permitted under the zoning change would be adequately served by transportation, sewer, and water infrastructure.

As required by the Coastal Act, any amendment to a certified LCP implementation plan/zoning code must be consistent with and adequate to carry out policies of the certified land use plan, and land use plan amendments must conform with and be adequate to carry out the Chapter 3 policies of the Coastal Act.

#### 4. Non-conforming Parcels Development Controls

We support the County's efforts to implement stricter development standards on non-conforming parcels. This will hopefully lead to more mergers of non-conforming parcels and help reduce residential buildout levels.

#### 5. Development Controls in Midcoast Rural Zoning Districts

Commission staff supports deleting timber harvesting, surface mining, oil and gas exploration and solid waste facilities as permitted uses in RM-CZ and PAD zoning districts. However, we recommend that the County add a precise definition of the term "resource management purposes" as used in this section to determine when selective tree removal or thinning would be permitted. For example, would "resource management purposes" be limited to creation, enhancement, and restoration of sensitive habitat to benefit ecosystem functions or would it include fuel reduction?

Commission staff supports reduced height limits and establishing size limits for residential development in the rural zoning districts. However, we recommend that the County conduct further analysis on how the proposed R-1/S-17 zoning district development standards are appropriate for the rural areas and consistent with the visual resources policies of the certified LUP.

LUP Visual resources policies state:

##### *8.18 Development Design*

*a. Require that development (1) blend with and be subordinate to the environment and the character of the area where located, and (2) be as unobtrusive as possible and not detract from the natural, open space or visual qualities of the area, including but not limited to siting, design, layout, size, height, shape, materials, colors, access and landscaping.*

...

##### *8.20 Scale*

*Relate structures in size and scale to adjacent buildings and landforms.*

Commission staff is concerned that the County staff report lacks information necessary to evaluate the proposed rural house size standards for conformity with the above-cited policies of the County's LUP. Specifically, the analysis presented in the staff report does not appear to relate the proposed floor area and height restrictions to the scale or character of existing development within the affected areas. An accurate and complete description of the character, size, and scale of the existing development and landforms in the affected areas is required to assess whether the proposed floor-area and height limits are compatible with the character of the surrounding area and are related in size and scale to adjacent buildings and landforms. The Commission staff will require such information as a part of the County's LCP amendment application for the LCP update and we strongly encourage the County to conduct this analysis prior to taking final action on the update project. Please note that since the primary purpose of the above-cited policies is to preserve the scenic and visual qualities of coastal areas, the required description of the size, scale, and character of existing development should consider all existing development in the affected areas, and should not be limited only to recently permitted projects.

#### 6. Rural Residential Area Boundary

Commission staff supports redesignating areas currently zoned Rural Residential but that are not served by public water and/or sewer as Rural. We believe this change would help to ensure that development is concentrated in areas that are adequately served by available infrastructure.

#### 7. Lot Merger in Midcoast Rural Areas

We support the County's efforts to merge small lots less than 5,000 square feet. We suggest that the County also consider consolidating these small lots through a purchase of development rights program funded by traffic mitigation fees.

#### 8. Grandfathering Provision

Commission staff is concerned that the proposed "grandfathering" provision is overly permissive. The proposed Midcoast LCP update would enact numerous standards necessary to ensure the continued and improved protection of coastal resources and coastal access and recreation in light of substantial changed circumstances and new information since the LCP was first certified in 1982 and last updated in 1998. As such, it is important that once enacted the standards of the updated LCP are enforced as broadly as legally allowable. We suggest that the County revise the grandfathering provision to exempt from the updated LCP standards only those developments that are the subject of an approved development agreement or for which all required permits and approvals have been granted and vested.

We appreciate this opportunity to comment on the County's LCP update and hope our comments are of assistance. If you have any questions, please do not hesitate to contact Chris Kern or me at (415) 904-5260.

Sincerely,

YinLan Zhang  
Coastal Program Analyst  
North Central Coast District

Cc: Jack Liebster, City of Half Moon Bay  
April Vargas, Committee for Green Foothill  
Karen Wilson, MidCoast Community Council