



COMMITTEE FOR  
GREEN FOOTHILLS

July 30, 2003

Project Planner George Bergman  
County of San Mateo Planning and Building Division  
455 County Center, 2<sup>nd</sup> Floor  
Mail Drop PLN-122  
Redwood City, CA 94063-1646

Dear Mr. Bergman:

The Committee for Green Foothills appreciates the opportunity to comment on the Midcoast Local Coastal Program Update Project. The specific Tasks we have chosen to address are those which represent the most vital concerns of our 1300 member families and align most closely with our mission statement, “...to protect and preserve the hills, forests, creeks, wetlands and coastal lands of the San Francisco Peninsula...”.

After reviewing the staff's Outcomes Report and the recommendations of the MidCoast Community Council, we offer the following comments and specific proposals:

**Task 1:** We concur with the detailed analysis of residential build-out numbers prepared by the MCC. We are particularly concerned about the 11% increase in units/population that will occur without an effective merger policy for the reduction of the number of substandard lots and the fact that existing, though unapproved, second units are not included in the build out numbers presented.

In addition to the five recommendations presented by the MCC, we recommend that the County approve no new subdivisions, unless there is adequate mitigation for overburdening the Coastside's roads, water and sewer systems that may not be able to accommodate build out of the already subdivided lots.

**Task 2:** We support the analysis by the MCC and urge consideration of the fact that there are many existing subdivided lots in the Midcoast that may not be developable because they are located in environmentally sensitive areas or have severe geologic hazards.

Examples include:

- properties in the Montecito riparian area of El Granada
- wetland areas in north El Granada
- lots in Princeton that are currently under water
- zones 1 and 2 in Seal Cove that have severe geologic hazards due to the Seal Cove Fault and cliff retreat.

In addition to supporting the three recommendations presented by the MCC, we urge the County to institute a program to acquire these lots and retire them from potential development. The Coastal Conservancy could supply the necessary funding.

**Task 4:** We recommend that the County clarify that the annual residential growth rate limit applies to the number of dwelling units, rather than the number of building permits. We support the historical growth rate of 52 housing units per year within the entire project area.

**Task 5:** We share the concerns of the MCC regarding the potential increase in build out numbers absent an effective merger policy. We support all three of the MCC recommendations for this Task.

**Task 6:** When the first group of Midcoast LCP amendments, addressing house size, were heard by the California Coastal Commission in September of 2001, the County promised that additional design review standards would be developed and submitted to the Commission as a part of the Midcoast Local Coastal Program Update Project. Committee for Green Foothills supported approval of the house size amendments on this basis. We support the proposed standards developed by the duly appointed members of the Coastside Design Review Committee and recommend their approval.

**Task 7:** While CGF is sympathetic to the need to address increased traffic impacts caused by continuing residential development, we support only those highway improvements that are consistent with the Coastal Act, Sections 30250 – 30254.

**Task 8:** We support all seven of the MCC recommendations for this Task to ensure that the W district retains its capacity to serve as a working waterfront, accommodating marine related trades and services and industrial land uses that support commercial fishing and recreational boating activities, as set forth in current LCP Policy 12.3 and Section 30224 of the Coastal Act.

**Task 9:** We support the MCC recommendation for this Task.

**Tasks 10–12:** Concerned that the addition and approval of residential uses in zoning districts which are primarily non-residential will increase build out numbers and exacerbate the current jobs/housing imbalance, we support all five of the MCC recommendations for these Tasks.

**Task 13:** CGF is concerned that the County's practice of granting use permits, exceptions, and variances to set backs and allowing antiquated subdivisions to take precedence on Open Space, Agricultural and Very Low Density Residential parcels is allowing densities similar to R1-S17 and is defeating the intent of that designation on these lands to preserve open space. We urge the County to enforce the LCP zoning standards that were intended to resolve conflicts with the underlying antiquated subdivisions.

We agree with the MCC that OS, AG and Very Low Density Residential areas within the urban boundary need to be defined as rural and specifically fall under the prohibition of sewer and water utility extensions. We support language that states that no parcel may be created by any means that will result in a parcel smaller than that allowed by Table 1.2 in the current LCP. Based on the results of a density analysis, it may be necessary for this minimum requirement to become more restrictive.

We oppose any additional residential uses on the Caltrans right of way lands for the Devil's Slide bypass and support their rezoning to ensure that they are acquired by a public agency as a linear park/trail corridor for the recreational benefit of the surrounding community.

Committee for Green Foothills recommends:

1. Merger of all lots held in contiguous common ownership in the OS and AG areas to meet the minimum density designations.
2. Basing PAD and RM-CZ build out on carrying capacity, not buildable parcels, or subdivisions pre-existing the Coastal Act. As stated in Task 2 above, the County must develop a process to acquire lots in sensitive areas, including buffer zones as well as creeks, riparian habitats, wetlands, visual resources, steep slopes, ocean shore/bluff tops.
3. Limiting uses on parcels designated OS and AG to those compatible with scenic resources and protection of wetlands and other sensitive habitats. We reiterate our recommendation urging the County to institute a program for the acquisition of parcels with uses restricted by the enforcement of this policy.
4. Adopting Design Review standards and procedures for the areas cited within this Task.
5. Maintaining the 28 foot house height limit, in conformance to the provisions of the Coastal Protection Initiative but adopting the Compatible Uses Alternative and Scaled House Alternative with a maximum floor area cap of 5000 square feet for parcels over five acres and maximums for smaller houses as specified by the MCC in their recommendations for this Task.
6. No expansion of urban services into the areas designated Very Low Density Residential.
7. Recognizing and enforcing LCP Policies 1.3 (b) and 1.5 (b) in preference to allowing unlimited development of the antiquated subdivisions preexisting adoption of the County Subdivision Ordinance. Such enforcement should be performed in a manner that is most protective of environmental resources.

**Task 14:** CGF Recommends:

1. Merger of all lots held in contiguous common ownership to meet the density designations.
2. That once the Caltrans Devil's Slide bypass right of way in the Montara/Moss Beach area is declared surplus property, it should be accepted by the County to provide a linear park and trail corridor in this area of the community. There should be no future residential development of this right of way, and the few existing residences should be eliminated.
3. Adopting Design Review standards and procedures for the areas cited within this Task.
4. Height and floor area ratio limits as stated in Task 13 above.
5. No expansion of urban services into the areas designated Very Low Density Residential.
6. Recognizing and enforcing LCP Policies 1.3 (b) and 1.5 (b) as stated in Task 13 above.

**Tasks 15–17:** Committee for Green Foothills supports all nine of the MCC recommendations for these three Tasks.

**Task 18:** CGF supports both of the MCC's recommendations for this Task.

**Task 19:** CGF recommends adoption of the new proposed definition of wetlands with the changes proposed by the MCC and their recommendation to accept the report on wetland enforcement.

**Task 20:** Committee for Green Foothills supports all seven of the MCC's recommendations for this Task.

**Task 21:** We support the MCC recommendations for this Task.

**Task 22:** CGF supports the MCC recommendation for this Task.

**Task 23:** Committee for Green Foothills supports the MCC recommendations for this Task.

In closing, we thank the County for holding the public workshops for this project on the Coast and commend you for your careful and conscientious efforts to integrate the views expressed at the public meetings into your final recommendations for each Task. Because attendance varied greatly throughout the course of the workshop cycle, we request that you include the number of attendees at each workshop as well the percentages in favor of each preference documented in your final report. This will allow decision makers to put the results of the "straw polling" into some sort of reasonable context. We also note that the "straw polling" reflects only the preferences of those who attended a particular workshop or meeting, depending upon which interest group rallied the most supporters for that particular meeting. It should not be taken as a definitive vote on the proposed alternatives.

Committee for Green Foothills looks forward to participating in the next stage of this important project and remains committed to establishing collaborative relationships with the County and Midcoast residents to ensure that our invaluable coastal resources are preserved, protected and accessible for all to enjoy.

Sincerely,

A handwritten signature in cursive script, appearing to read "April Vargas". The signature is fluid and somewhat stylized, with the first and last letters being particularly prominent.

April Vargas  
San Mateo County Legislative Advocate  
Committee for Green Foothills