



November 28, 2009

Agenda Item TH 18.a  
Lennie Roberts

Bonnie Neely, Chair, and Members  
California Coastal Commission  
45 Fremont Street, Suite 2000  
San Francisco, CA 94105-2219

**Re: San Mateo County LCP Amendment No. SMC-MAJ-1-07  
(Midcoast LCP Update)**

Dear Chair Neely and Members of the Commission,

On behalf of Committee for Green Foothills (CGF), I write in support of the Staff Recommendation for Approval of the San Mateo County Midcoast LCP Update with suggested modifications.

The San Mateo County LCP was the first County LCP certified by the Coastal Commission (in 1981). The San Mateo County coastal zone is 55 miles long and up to five miles wide; most of the coastal zone is rural. The Midcoast area comprises a relatively small portion of the county's coastal zone that shares critical infrastructure (roads, sewer, water, schools) with the City of Half Moon Bay.

There was a tremendous amount and intensity of work involved in drafting and certifying the LCP, which included both the Land Use Plan (LUP) policies and the Implementation Program (IP). Although the LCP, as certified, was a far-reaching and comprehensive document, CGF has long been concerned that significant gaps in LCP policies and data needed to be addressed through a comprehensive LCP Update.

In the urban Midcoast area, the cumulative impacts of new development in the City of Half Moon Bay as well as the unincorporated communities of El Granada, Princeton, Miramar, Moss Beach, and Montara have raised significant issues of adequacy of the infrastructure to serve buildout without adversely impacting coastal resources and/or public access to and along the shore.

CGF commends the collaborative effort by Commission and County staff in working to resolve most of the significant issues that have been at issue regarding the Update's conformity with the Coastal Act.

Of the few remaining issues under discussion as of the 11/20/09 Staff Report, CGF has the following specific comments:

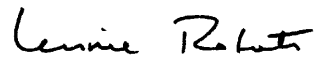
- a. **Annual Growth Rate:** CGF supports the Coastal staff's recommended growth rate limit of 40 (approximately 1%) residential units per year. The County Planning Commission also recommended this limit, and it is consistent with Half Moon Bay's annual limit on residential units. Over the past five years an average of 38 residential units have been approved annually, and County Planning staff concedes that the limit of 40 residential units

should not have a significant impact on the current rate of development. CGF does not support or understand the rationale for exceptions to the growth limit for Princeton caretaker units or for second units, as they also contribute to the infrastructure demand.

- b. **Private Drinking Water Wells and Septic Systems:** CGF strongly supports the prohibition of new drinking water wells and septic systems in the urban midcoast area. Allowing private wells within the boundaries of public water agencies threatens the economic viability of the public agencies, and places an undue economic burden on their customers. Moreover, locating individual wells in an urban area in close proximity to sewer lines and old septic tanks increases the potential for contamination of these wells. The groundwater basins are very limited in this area of the coast. Already some wells have failed, and in drought cycles we can expect many more to fail. Similarly, it makes no sense to allow private septic systems within the boundaries of public wastewater treatment agencies, unless there are no public hookups available.
- c. **Public Works Capacities:** The County's certified LCP already requires new public works facilities to be phased with each other and to be sized so as to serve, but not exceed, the buildout allowed by the LCP. Coastal staff is recommending that for public works expansion projects aimed at solving existing deficiencies for existing development (i.e. to serve existing development on private wells or new infrastructure to solve the wet weather flow problem), other public works deficiencies do not need to be solved first. If the public works project were sized to accommodate estimated buildout, the permit for the project could be conditioned to allow the phasing of new sewer or water connections, for example. CGF supports this approach as being consistent with Sections 30250 and 30254 of the Coastal Act.
- d. **Prioritizing Service Capacities for Affordable Housing:** Although affordable housing is not a Coastal Act priority land use, San Mateo County has made affordable housing a County LCP priority land use. To ensure the continued reservation of public works capacity for Coastal Act priority land uses, Coastal staff is proposing that a second tier of LCP priority uses, such as affordable housing, be reserved. CGF supports this approach.
- e. **Traffic/Transportation Mitigation:** CGF supports the Coastal staff's recommendation that new land divisions require merger or retirement of the same number of existing lots as new lots created by the land division. CGF could support an exception to the traffic mitigation for conditional COC's that are necessary to legalize lots (per the Witt and Abernathy decisions) that are also conditioned to ensure consistency with current zoning and other applicable LCP requirements, inasmuch as these lots have already been accounted for in the certified LCP's buildout numbers. The County has not yet adopted a traffic mitigation fee structure for new development in the urban midcoast, similar to Half Moon Bay's. Such a traffic mitigation fee would help fund necessary traffic and safety improvements.
- f. **Rezoning of Bypass Lands:** CGF supports the rezoning of the former Caltrans Right of Way for the Devil's Slide Bypass as Linear Park and Trail as an important step to ensure that these lands will become a trail and park system that will provide public access and a scenic non-motorized transportation route. The issues of access to private property and/or areas needed by Caltrans for staging and maintenance purposes could be addressed by the zoning standards. Given all of the infrastructure and buildout issues discussed previously, particularly as those issues apply to the former Right of Way area, CGF does not understand or support the zoning of any portion of the Right of Way for housing purposes.

Thank you for consideration of our comments. We urge your approval of the LCP Amendment with the suggested modifications per staff.

Sincerely,

A handwritten signature in black ink that reads "Lennie Roberts". The signature is written in a cursive style with a large initial "L" and a distinct "R".

Lennie Roberts, Legislative Advocate  
Committee for Green Foothills