



October 13, 2020

Mayor Adam Eisen and Members of the
Half Moon Bay City Council
501 Main Street
Half Moon Bay CA 94019

Re: Local Coastal Program Land Use Plan Public Hearings

Dear Mayor Eisen and City Council members,

Green Foothills appreciates the collaborative process established for the City's Local Coastal Program Land Use Plan Update and for the results of four years of work that are now before you. The comprehensive Local Coastal Program Update initially was coupled with the General Plan Update in 2013, but in 2016 became the sole planning focus. We commend the City's planning staff for their tireless work in conjunction with the GPAC, the Planning Commission, and your Council. City staff has also been available to members property owners/applicants as well as members of the public to answer questions, clarify, and revise policies, where appropriate. Because of the document's complexity, as well as a significant amount of new material, we may need to address some issues with Coastal Commission staff.

The Final Draft Land Use Plan includes a comprehensive set of policies that will set the course for decisions regarding conservation and development on lands within the City's jurisdiction for the next 20-40 years.

A great deal has changed since the 1996 LCP was adopted. Impacts from climate change now pose very real challenges to the City; these challenges will surely increase. Sea level rise – now accelerating - threatens loss of coastal beaches and bluffs, increased flood and fire hazards, and major impacts to the City's watercourses, ground water resources, and environmentally sensitive habitat areas (ESHA). New focus and clear policies of the updated LUP appropriately prioritize protection of coastal resources, including prime agricultural lands, sensitive habitats, and coastal access. The Town Center concept emphasizes locating new housing, including affordable housing, as well as expansion of commercial and visitor serving uses within this defined area. This concentration of most new development in the Town Center will help minimize traffic, provide for more efficient delivery of services, and discourage conversion of open space and agricultural lands to urban uses.

We commend the LUP's new direction regarding the long-term protection of agricultural and open space lands that are within the City's jurisdiction. Coastal Act Section 30222 prioritizes use of private lands for (1) agriculture, (2) coastal-dependent industry, (3) visitor-serving commercial recreation, and (4) residential. Although housing is the lowest priority, coastal workforce housing, as now provided in

the Draft LUP, will qualify as a priority use as it is directly associated with and limited to the underlying use (i.e., agriculture, horticulture, or public facilities such as schools and churches).

Half Moon Bay's coastal foggy summers and mild winter temperatures provide ideal conditions for growing a wide variety of crops. A new generation of innovative farmers in San Mateo County is employing new practices, including regenerative soil management, diversified crops, inclusion of wildlife-friendly practices, and direct marketing to residents and visitors who appreciate the value of local, fresh, and healthy food sources. The COVID-19 crisis has also highlighted the importance of local farms and farm workers to our food security.

We are hopeful that the LUP and its Implementing Ordinances, when certified, will become the blueprint for future City decision-makers to maximize resiliency and adaptation to climate change over the next 20 years and beyond.

The Governor's Executive Order N-82-20, signed on October 7, 2020, outlines a bold plan to address climate change. The Orders Findings include:

- California is home to more species of plants and animals than any other state, and this biodiversity accounts for about one third of all species found in the nation,
- California's rich biodiversity is increasingly threatened by loss of habitat, spread of invasive species, decreasing water supplies, and increasingly frequent and severe climate impacts,
- As we work to mitigate greenhouse gas emissions, we must also accelerate actions to enable the State to adapt and become more resilient to the impacts of climate change, including expanding nature-based solutions – the use of sustainable land management practices to tackle environmental, social and economic challenges (emphasis added).

The Executive Order proposes a new initiative for state agencies to develop a Natural and Working Lands Climate Smart Strategy that advances the State's carbon neutrality goal and builds climate resilience, including support of pathways for agriculture to participate in the transition to a carbon neutrality economy.

Half Moon Bay is uniquely suited to become a potential beneficiary of various initiatives and funding sources resulting from the Governor's order.

As highlighted in the American Farmland Trust's Greener Fields: California Communities Combating Climate Change, **an acre of farmland in California produces 58-70 times fewer greenhouse gases than an acre of urban land**. The policies in the City's LUP Update that require protection of Half Moon Bay's farm fields and prime soils will help achieve the City's goals for Greenhouse Gas Emissions (GHGs) reduction. These policies also best meet the City's guiding principles for this planning effort that emphasize: (1) maintaining Half Moon Bay's small town character and quality of life, and (2) enhancing the City's scenic visual quality and coastal landscape setting and ensuring protection of environmental and agricultural resources through conservation and sustainable development.



Thank you for consideration of our comments and thanks again to the City staff for being available to discuss and clarify issues, and for responding to suggested modifications.

Sincerely,

Lennie Roberts, Legislative Advocate, Green Foothills

