

Midcoast Community Council

Deborah Lardie . Kathryn Slater-Carter . Neil Merrilees . Gael Erickson . Leonard Woren . Sabrina Brennan

An elected Municipal Advisory Council to the San Mateo County Board of Supervisors

serving 12,000 coastal residents

Post Office Box 248, Moss Beach, CA 94038-0064

<http://mcc.sanmateo.org>

Monday, June 15, 2009

Supervisor Richard Gordon
San Mateo County Board of Supervisors
455 County Center,
Redwood City, CA 94063

Re: LCP Update

Honorable Supervisor Gordon,

The Midcoast Community Council thanks the Board of Supervisors and County Staff for giving coastsiders an opportunity to comment on the County Planning and Building Staff's proposed response to the California Coastal Commission's suggested modifications to the Midcoast LCP Update.

The MCC urges the Board of Supervisors to accept all of the California Coastal Commission staff recommendations with the exception of the minor adjustment described in the first recommendation below.

Revision to Annual Growth Rate:

Coastal Commission staff recommends a 1% residential growth rate per year. The County staff report suggests 75 residential units per year. Recognizing that a growth rate based on population is difficult to administer, the MCC recommends a residential growth rate of 40 units per year, which is the equivalent of 1% annual growth rate per year. 40 units per year is the historic average rate of new residential construction. Additionally, since second units and affordable units contribute to infrastructure problems, they need to count towards the annual limit.

Water Quality Protection:

The MCC recommends that County staff and Coastal Commission staff work together to develop a procedure to expedite minor LCP amendments required for implementing updates to the SMCWPPP regulations.

New Policy Requiring the Demonstration of Public Service Capacities:

Midcoast infrastructure is severely deficient and does not meet current population needs. At 50% of the proposed buildout the Midcoast lacks adequate access, community parks, storm drainage systems, water supply, and wet weather sewer infrastructure. We agree with County staff that adequacy and standards must be clearly stated and measurable. We disagree with the position that development should continue until the standards are agreed upon. Since the completion of the sewer plant expansion in 1999, there has been much new development but there has been no improvement in getting an adequate urban water supply, storm drainage, and road systems. Instead, that new development has put the Midcoast further behind in achieving necessary levels of resource protection.

Since the school district discontinued bus service to the middle school and high school in Half Moon Bay traffic has increased at peak commute hours from Montara to Half Moon Bay.

It should be noted that, before the construction of the original SAM plant in the early 1980's ABAG raised concerns regarding increased air pollution resulting from an increase in commute traffic due to additional population. The County, in its support of the expanded wastewater treatment system, agreed to increase mass transit to and from the coast. Cost and time constraints have made this infeasible for the County and commuters.

Prohibition of Wells and Septic Systems:

MCC supports the Coastal Commission staff recommendation to prohibit new urban development on wells and septic systems. The County is recommending a case-by-case review for urban development on wells and septic systems. Limited County staff resources will result in inadequate case-by-case reviews. An existing example of a case-by-case review not working is the inadequate review of tree removal permits, which are rarely denied.

The process proposed by the County to evaluate the impact of development of individual projects on wells will not protect coastal groundwater resources. The most recent groundwater study and the EIRs from the late 1980's show that our groundwater basins are at risk in dry years. It would be cost prohibitive for a builder of an individual project to do a groundwater study evaluating water quality and water level on neighboring wells, nearby wetland and riparian resources in addition to the test well.

New Policies Regulating the Size of Public Works:

Public works projects must be sized to provide the highest level of resource protection while meeting the needs of the future population while avoiding being growth-inducing.

The 1999 expansion of the SAM plant facilitated development however it has not resulted in improvements in roadways, storm drains, water supply, etc. Relying on new development to solve existing problems of inadequate infrastructure does not work because it's not sustainable.

The recently adopted County Storm Water Drainage Plan is dependent on funding by the existing community. Yet the need is created primarily by new development. Given the usual failure of voter approval for new assessments and parcel taxes, the construction of improved systems is highly unlikely. Allowing new development without planned, funded systems will only result in further congestion, water pollution, and degradation of coastal resources.

Devils Slide Segment of the California Coastal Trail:

The MCC recommends that short-term temporary closures be allowed for repair of safety hazards on the Devils Slide Segment of the Coastal Trail.

Conclusion:

MCC agrees with Coastal Commission staff recommendations on all issues not otherwise addressed in this letter.

Sincerely,

Kathryn Slater-Carter,
MCC Secretary,
For Deborah Lardie, MCC Chair

Cc: Supervisor Mark Church, Supervisor Adrienne Tissier, Supervisor Rose Jacobs Gibson, Supervisor Carole Groom, Deborah Lardie, Neil Merrilees, Gael Erickson, Leonard Woren, Sabrina Brennan