

MidCoast Community Council

An elected Municipal Advisory Council to the San Mateo County Board of Supervisors
Serving 12,000 coastal residents
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To: San Mateo County Board of Supervisors
San Mateo County Planning Commission
Marcia Raines, Director of Environmental Services
George Bergman, Long-Range Planning Staff

cc:

Honorable Supervisors, Commissioners, and Staff:

The MidCoast Community Council appreciates the opportunity to comment on the Alternatives Report for the Midcoast Local Coastal Program (LCP) Update Project. Council members have been particularly sensitive to the goal of the Local Coastal Program update project, which we understand is to bring the San Mateo County LCP into better compliance with the objectives and mandates of the Coastal Initiative of 1972 (adopted by the voters of California) and the Coastal Act of 1976, using better information and experience from the 22 years since the LCP was certified. The Coastal Initiative and the Coastal seek to preserve our unique coastal resources for enjoyment by all Californians (and, indeed, visitors from all over the world), as well add protections to assure the continued survival of many species critically dependent on coastal resources.

Since early in 2002, the Council has been attending public meetings on the LCP alternatives and has been discussing the alternatives in both regular and special meetings. Detailed findings and recommendations are contained in the attached document, "MCC Recommendations on the LCP Update Tasks", which consists of 26 pages, plus attachments.

Our summary thoughts on the LCP update tasks are:

- The planning horizon extends to the "buildout" number, the high-water mark of dwelling units that could possibly be built using existing land use policies, after a merger program. Although policy changes could reduce the buildout number somewhat, at the historical rate of 52 units per year it would take almost 60 years to achieve buildout. We feel that adopting a *20-year planning horizon* makes more sense than planning for a buildout number at such a distance in time.
- The buildout number is based on land use policies, rather than on the carrying capacity of the MidCoast in terms of sewer, water, roads, schools, and parks. It is manifestly clear from the data gathered for Task 3 and Task 7 that the roads are already overcrowded, and there is not enough

water to achieve buildout, or even to carry us for the next 20 years. The assumption that, at buildout, “all parcels will receive water from a water service provider” (“Projected Water Supply Demand and Capacity at LCP Buildout, document gdbn0691_wkm.doc) begs the huge and very costly question of how households currently on wells will get connected to “city water” before the MidCoast experiences critical failures of public and private wells.

- Growth is anticipated mainly in terms of single-family residences. The data gathered for the *Mid-Coast Incorporation/Annexation Fiscal Study* clearly indicate that encouraging commercial development to address the jobs/housing imbalance would be of more benefit to the MidCoast than creating more single-family residences.
- The buildout number should not be taken as a *target*, but only as a remotely possible worst-case index of how much we could overbuild the MidCoast if we didn’t use properly analyzed shorter-term planning scenarios based on the true carrying capacity of this unique area.
- Unfortunately, the number and complexity of the LCP update tasks led to a process that considered each task in isolation. In general, the outcomes of decisions on key factors such as growth rate have not been fed into a multi-factorial analysis that takes into account the cumulative impact of decisions on other task areas. The MidCoast Community Council is concerned that this update package may be treated as a number of independent and un-related issues, rather than as *inter-dependent* data points requiring sophisticated and dynamic analysis of the cumulative environmental impact. For example, the new sensitive habitat maps and definitions affect the development potential of Princeton and Airport-area industrial sites and limit our options for correcting the jobs/housing imbalance at those particular locations.
- Finally, it must be remembered that the MidCoast is a resource not only for San Mateo County but for all the residents of the State of California. The entirety of the MidCoast falls within the Coastal Zone and is protected by the policies of the Coastal Act. It is for this reason that we suggest our LCP incorporate, by reference, *all* of Chapter 3 of the Coastal Act, Sections 30200 through 3-265.5 [See Attachment A to the MCC Comments].
- The 35,000,000 resident Californians that this LCP update affects are only represented by community members and elected officials who pay particular attention to the legislative requirements. As you may be aware, the outcomes of several of the LCP update sessions were heavily biased by people who had a financial interest in the outcome of the session. While every citizen has the right to press for changes in government policies that will be of individual advantage to that citizen, your policy decisions cannot be based on a simple count of the number of interested parties who attended a particular meeting to support one position or another.

- The County's (and the Coastal Commission's) duty is to weigh the self-interested suggestions against the Coastal Act policies and objectives, selecting the alternative that, on balance, is *most protective of coastal resources*, not the alternative that happens to produce the greatest economic benefit for a small group of landowners. As an example, the current state of the fishing industry should not be used as a justification for conversion of marine-related uses to other, non-coastal-dependent, land uses that could just as well be located far away from the coast.

George Bergman has done an outstanding job in analyzing the many tasks in this project, proposing alternatives, listening carefully to public participation, and formulating staff recommendations. We are pleased that, in many areas, the Council is able to fully support the staff recommendations. For those tasks where we support a different alternative, we expect that the attached document, together with more detailed supporting information during the hearing process, will assist the County in reaching the best choices for all who benefit from preservation of coastal resources.

Respectfully,

Paul Perkovic
Chair, MidCoast Community Council