

MidCoast Community Council

An elected Municipal Advisory Council to the San Mateo County Board of Supervisors
Serving 11,000 coastal residents
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Via Email & Fax: 4 Pages

To: San Mateo County Board of Supervisors
County Government Center, Hall of Justice & Records
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Dear President Gordon, Vice-President Hill, Supervisors Church, Jacobs Gibson and Tissier

As the elected representative body of the 11,000 residents of the MidCoast Communities, and as the designated advisory council of those residents to your Board, the MidCoast Community Council (MCC) would like to submit our comments on the MidCoast Local Coastal Plan Update for your first hearing on February 15, 2005.

As stated in our earlier letters, we believe the package compiled by the Planning Commission is the best expression of our individual rights, community rights, and property rights – the rights to retain the value and character of our communities through reasonable development controls, preservation of open space, environmental sensitivity, and respect of precious coastal resources. We recommend that the proposal be adopted as it is presented in its entirety, but this letter will focus on just the issues scheduled for the first hearing.

1. UPDATED ESTIMATE OF MIDCOAST RESIDENTIAL BUILD-OUT

The MCC supports the numbers derived by staff as an accurate picture of build-out under current LCP policy. The recommended merger policy (#4 below), as well as other decisions made within this process (levels of residential uses in other districts), will affect the final number under the new LCP policies.

In the initial 1980 build-out estimates for the original LCP, 6200 dwelling units were projected for the urban area of the MidCoast (page A.1 of Appendix A of main staff report). Changes in the Subdivision Map Act allowed an increase in density by facilitating development of sub-standard parcels. This new count shows, with no merger policy, and no further controls on residential development in non-residential districts, a build-out of potential of 7,728 units in the urban area, an existing increase of 24.6% over the original planned density and infrastructure capacity.

We would like to stress that this number is a product of the calculated potential build-out size, and not a goal to be strived towards without proper accompanying planning for infrastructure capacity and environmental/coastal resource protections. Please refer to #2 below.

One of the main focuses of the recommendations that came out of the Planning Commission hearings was to “ .. *preserve planned-for LCP density and capacity*”. We are already dealing with a substantial increase over what was originally certified in the LCP, an increase that significantly exceeds the planned capacity of our roads, infrastructure, schools, visitor serving capability, and

negatively impacts the quality of life in the coastal communities. Identifying and addressing these problems is the purpose of this update process.

The MCC supports the idea of an amnesty program to facilitate legalization of second units. We had originally suggested the idea in our letter to the Planning Commission of September 20, 2004. We think the programs enacted in other parts of the County, specifically San Carlos and Daly City, would be good starting examples for developing our own locally-appropriate program after proper review, analysis, and modification.

The build-out number has been a shadowy figure in the past, open to interpretation and confusion. Having a credible, verifiable number will help in all aspects of planning by all agencies involved in the MidCoast, and allow proper analysis of the impacts, positive and negative, of any changes proposed in this update process.

2. UPDATED ESTIMATE OF MIDCOAST INFRASTRUCTURE DEMAND AT BUILD-OUT

The MCC supports the acceptance of the staff-derived data, while noting that the studies show that water supply and traffic capability are inadequate to support current rates of growth and the projected build-out total. We agree with the Planning Commission recommendation to “... plan growth to the level that the available resources can support.”

Determining the capability of infrastructure to support projected growth rates is the first link of the Update Process, and this item provides a base-line analysis from which to begin. We believe that consideration should also be given to “quality-of-life” infrastructure requirements, such as schools, transportation facilities, the balance of jobs-to-housing, and parks, cultural, community and recreational facilities. Beyond these initial numbers, it will important for the County to develop and maintain a review process to assess:

- Utility Districts plans for expansion and carrying capacity
- Planned Highway improvements
- Transit availability
- County Public Works capacity for maintaining required standards for roads and drainage
- Overall and individual consideration of impacts to environmental and coastal resources

Other aspects of this Update will examine some of these issues specifically, some will need to be incorporated as policy-level implementations of these updates.

3. UPDATED ESTIMATE OF THE NUMBER OF MIDCOAST RESIDENTIAL NON-CONFORMING PARCELS

The MCC supports the numbers derived by staff as an accurate count of the number of residential non-conforming parcels. The count conducted by staff determined there are 4,899 substandard lots in the MidCoast – 1,605 undeveloped and 3,294 developed.

Of the developed parcels, 197 consisted of existing single parcel residential development, which equates to approximately an increase of 98 more houses than current zoning standards had intended or planned for. These extra houses add more cars to the highways, use more water and sewer capacity, add more children to our school system than are planned for. Potential excessive development of other substandard lots underlines the need for a comprehensive merger policy based on minimum zoning parcel sizes.

4. CONSIDERATION OF ADDITIONAL MIDCOAST TRAFFIC MITIGATION REQUIREMENTS

The MCC supports the recommendations of the Planning Commission, even though it is not in agreement with our original recommendation, for reason of supporting the entire package as a proper representation of the community's participation in the process. We particularly encourage that serious effort, in coordination with the City of Half Moon Bay and the Bayside cities, be devoted to the expansion of shuttle and transit services between the MidCoast and the Bayside.

5. CONSIDERATION OF MERGING APPLICABLE MIDCOAST SUBSTANDARD RESIDENTIAL LOTS

The MCC supports the Planning Commission recommendation for a comprehensive merger policy. There is nothing unfair in requiring property owners to abide by the laws and regulations regarding development in their community. The urban area of the MidCoast communities consists of fully subdivided (some might say "over-subdivided") areas, with no large, singular tracts of land that would be affected by a merger process.

If the identified 1,605 unmerged & undeveloped parcels were developed, that would be:

- 800 more water connections we do not have
- 1,600 more cars on roads that cannot handle them
- 1,100 more children for schools & recreation facilities that cannot accommodate them

There is a serious, and acknowledged, lack of coordinated planning by the County, our school district, Caltrans, our utility districts, and the Cities of Half Moon Bay and Pacifica. It would also present a very dangerous precedent for the individual development of the remaining 3,294 unmerged but developed parcels, if the economic incentive is to demolish one house and build 2 or more in its place.

Many property owners have merged their parcels to develop their property within the framework of existing zoning regulations and community standards. To allow others to avoid this simple responsibility and develop at 2 – 4 times the designated density would be insulting and damaging to the individual property rights of those who have chosen to obey the law.

The County has a history of policies and practices in place that require substandard lot merger when property is developed. This change simply codifies the process and avoids any potential failures/errors that could undermine the planning process. The LCP already requires lot merger in the Seal Cove and Miramar areas. Merger of substandard parcels in both the urban and rural districts of the coast is essential to controlling our development density and keeping access to the coast available to all citizens of California as well as encouraging a healthy visitor serving economy.

6. CONSIDERATION OF IMPERVIOUS SURFACE AND WINTER GRADING LIMITS FOR NEW DEVELOPMENT

In consideration of the problems we are seeing this winter with increased runoff, erosion, sedimentation, flooding, and creek pollution, the MCC very enthusiastically supports the Planning Commission's recommendation.

There is a need for some strong advocacy (and a little elbow-grease) within the County Government to effect some creative, effective, community-friendly and environmentally beneficial solutions to

begin to handle the drainage problems in the MidCoast. With the coming of this rainy season, we have seen a recurrence of past flooding and runoff problems, but worse than in past years. After only 7” of rain (cumulatively for December) we were seeing runoff levels and flooding damage similar to late-January/early-February storms when ground saturation is reached. The Council received a number of complaints from residents about damaging runoff from new construction uphill from them.

Current practice of project review only examines the immediate area when looking at drainage impacts. Runoff from new residences is not being properly assessed in terms of how much water the trees, vegetation, and undisturbed soil held. Storm water runoff from the property is assessed only as far as whether the gutter on that block can handle the flow. And so our creeks and wetlands are being lost or destroyed, established homes are seeing damage and loss of value and the expense of repairs, adding new drainage and sump systems. This is a point we have been making for many years now, and it is very frustrating to watch this situation grow worse each year in terms of safety, property damage, home value, and environmental degradation.

This policy is a major step in controlling this problem. Small changes, like expanded driveways, concrete patios, paved gutters, and un-buffered house drainage from new construction, when taken individually, would seem to have an inconsequential effect, and some might seem to be beneficial (cleaning the culverts) but when the entire system is examined, the need for comprehensive and coordinated planning and public works policies and practices becomes clear.

In summary the MCC recommendation is for your Board to expeditiously approve the LCP update as developed by the Planning Commission. Good planning practices and adherence to the requirements for development will not only maintain our long term sustainability, but will substantially cut down the number of appeals and save San Mateo County the endless hours and expenses of dealing with contradicting standards, costs that are carried by all County residents. It will make the policies and practices implementing our Local Coastal Program consistent with coastal resource protection and a healthy, prosperous community.

Thank you for your time and attention to these important issues – please do not hesitate to contact me for any further information or clarification.

Sincerely,

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Cc: Marcia Raines, Director of Environmental Services
George Bergman, Project Planner
Chris Kern, California Coastal Commission

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