

PLANNING AND ZONING COMMITTEE
MIDCOAST COMMUNITY COUNCIL

May 13, 1998

San Mateo County Board of Supervisors
Hall of Justice and Records
401 Marshall Street
Redwood City, CA 94063

Re: Consideration of an appeal of the Planning Commission's decision to approve a Coastal Development Permit and a Resource Management Permit to allow drilling of a domestic well on a parcel in Moss Beach

The MidCoast Community Council Planning and Zoning Committee submitted comments on this project for the Planning Commission Hearing, January 14, 1998. Having noted this correspondence was not included in your packet, I have summarized our major concerns, below, supporting the request that this decision be reviewed and reversed.

➡ **Piecemealing – Non-compliance with CEQA**

1. The cumulative impacts of this project must be determined for the entire project, now. This project requires an adequate level of Environmental Impact Reports and associated studies.
2. County Council claims this project is solely a domestic water well and therefore not subject to CEQA regulations. This is the first step in the planned development of seven lots.
3. Early in development of CEQA law, the California Supreme Court established that it is "the mandate of CEQA that environmental considerations do not become submerged by chopping a large project into many little ones – each with a minimal potential impact on the environment – which cumulatively may have disastrous consequences." "A public agency is not permitted to subdivide a single project into smaller individual sub-projects in order to avoid the responsibility of considering the environmental impact of the project as whole." *

➡ **Lot Line Adjustment – Non-Compliance with the Subdivision Map Act**

1. State law authorizes local agency discretion to approve, deny or condition lot-line adjustments to conform resulting parcels to local zoning and building ordinances. As discretionary "projects", lot-line adjustments are subject to the requirements of CEQA.*
2. The integrity of our RM/CZ zoning is being violated. Our Local Coastal Plan anticipates this zoning as being used for open space, with very low-density residential development (one residence per 5 to 40 acres, for example). We need the County's support to consistently uphold the spirit of this designation.
3. There is no evidence that this Lot Line Adjustment is consistent with our General Plan. It has violated the integrity of the RM/CZ Zoning District.

Laura Stein

Chair, Planning and Zoning Committee

*Resources provided upon request