

Midcoast Community Council

*An elected Advisory Council to the San Mateo County Board of Supervisors
representing Montara, Moss Beach, El Granada, Princeton, and Miramar*

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Date: March 12, 2014

To: Camille Leung, Project Planner

CC: CCC staff Nancy Cave, Jo Ginsberg

Subject: **PLN2006-00494 La Costanera Use Permit Amendment**

Revised Negative Declaration of Environmental Impact for:

- Expanded restaurant hours to daytime on Fridays/weekends.
- Legalized exterior building improvements (lighting, patios).
- Grading/drainage of adjacent State Parks beach parking lot.

The Midcoast Community Council submits the following comments on the revised Initial Study and Negative Declaration.

Transportation (#5)

The 1977 original restaurant Use Permit included a parking exception to allow 53 parking spaces where 63 were required for the 189-seat restaurant (1 space for 3 restaurant seats). The County accommodated the project by allowing the use of the 1st St right-of-way on the north side of the restaurant for parking Lot A. The restaurant was permitted as a "dinner house" with adequate parking provided via the shared beach parking in Lot A. 1981 application for daytime Sunday operating hours was denied by the Coastal Commission because the amount of available parking had not changed.

Lot B (north unpaved lot owned by State Parks)

Table 1 calculates that only 9 beach parking spaces would be lost on Fridays and weekends by arbitrarily understating the existing capacity of Lot B by 10 spaces. The report states, "The adjoining State property [Lot B] has been used historically for parking by users of Montara State Beach and can accommodate up to 20 vehicles..." Then it goes on to arbitrarily credit the lot with only 10 existing spaces. The proposed grading and drainage improvements to the lot would be beneficial, but would not create new parking capacity.

The actual number of lost beach parking spaces on Fridays and weekends would be 19, a significant impact which is not adequately mitigated (#5a). That level of loss assumes that daytime restaurant users will obey the proposed signage and not use Lot A and B. Mitigation Measure #9 is inadequate because it will be impossible to enforce, which means far more than 19 beach parking spaces may be lost. Restaurant management has demonstrated (in 2011 and 2013) its active resentment of beach parking by installing restaurant-only/ tow-away signage at the entrances to all three lots.

Table 1 calculates a gain of 16 beach parking spaces Mon-Thurs; however, ten of those spaces already exist in Lot B, as explained above. In any case, providing more beach parking on low-use weekdays does not mitigate for loss of parking on high-use weekends.

South Lot C

The parking plan calls for 5 new spaces to be created by restriping and 6 spaces to be created by valet access-area parking within the lot (Attachment G). No measurements are given for parking space dimensions and turning radii to show that the proposed plan will actually fit in the available space, which is limited by existing curbs, utility boxes, and vehicle access requirements. Even if all restaurant customers arrive in compact cars, the site layout shows serious challenges with managing that many extra cars, with no vehicle waiting/queuing space available on or off the highway. In addition, the lot must provide pedestrian access to the path west of the restaurant.

It is noted that the driveway throat remains open for vehicle drop-off & pick-up. The CA Coastal Trail will either have to cross that driveway throat or pass through Lot C to the path west of the restaurant. There is no southbound right turn lane into the lot, or adequate shoulder space, so any queuing caused by a car blocking the driveway will block Highway 1 traffic flow. Cars already queue to enter and leave the lots on busy weekends even without the restaurant being open.

It seems likely that patrons will prefer to self park in the other lots or nearby residential neighborhoods, so as not to have to wait for their cars to be unpacked from the valet lot. It is unlikely the restaurant would refuse entry to lunch patrons who have not turned their car over to Lot C valet parking.

Mitigation #10 does not adequately address impaired pedestrian beach access through Lot C on Fridays and weekends because the valet parking plan (Attachment G) simply has no room for designated walking/bicycle paths.

Traffic/Parking Study (Attachment L): Lunchtime traffic and parking counts were conducted Fri/Sat, November 16 and 17, 2012, a rainy winter weekend (local rainfall 0.6" Fri, 0.25" Sat). It is incorrect to conclude that available beach parking and gaps in highway traffic during the study represent a typical Friday/Saturday, much less peak beach use days. Therefore, the study does not adequately assess #5(c) changes in vehicular traffic patterns or volumes, (e) increased traffic hazards, or (g) adverse affects on the traffic carrying capacity of the highway. A Traffic Study on a sunny weekend is needed to adequately assess these issues.

Highway 1 Safety & Mobility Studies are referenced in the Negative Declaration as evidence of additional beach parking in the project area. That is a premature assumption. The Highway 1 Study contains only recommendations and conceptual plans, but there are no projects currently planned for added parking or trails in the project area.

Aesthetic #7a & b)

The Scenic Corridor's coastal viewshed, from mountain ridge to ocean, from Devil's Slide to Montara Gateway, has been preserved as natural open-space parkland. The restaurant site is highly visible from highway and beach and is the only commercial use in the entire viewshed. The 1977 CDP acknowledged the benefit of landscape screening of parking areas and the natural wood materials of the building in order to minimize the visual impact of commercial use of the property both from the beach and the highway.

Rather than minimizing visual impact, the applicant makes every effort to call attention to the commercial use. There are now 3 flagpoles in front with an advertising banner on the tallest pole and national flags on subsidiary poles, which are left out to tatter in the wind, rain and darkness. Advertising banners are prohibited in the Scenic Corridor. In addition

to the La Costanera banner and 4 permanent signs, large bright blue advertising signboards are set out in the front landscaping. Flood lighting of the parking lots and beach has continued intermittently over the last four years in spite of warnings from CCC staff to remove or leave lights turned off until their permit is approved. The unpermitted upper deck inexplicably contains bright white end panels instead of the natural wood of the building. The illuminated parking lot entrance signs have recently been painted bright orange.

Exterior Lighting

Mitigation measures (#11, 12, 13) are inadequate to address the extensive light pollution emanating from the site in this natural setting. LCP Policy 8.18(a) requires exterior lighting to be limited to the minimum necessary for safety, and placed such that direct rays are confined to the site. No matter what the wattage, floodlights directed off the restaurant parcel onto the beach or towards the parking lots and highway, do not comply with the LCP or Zoning Regulations.

In addition to the nine roof-mounted projector lights in the project plans, the following exterior lights are not shown:

- South-side floodlights: 2 toward parking lot, 1 toward utility area.
- Up-lights: 2 in front raised planter, 2 at flag pole, 3 north-side roof wash, 4 south-side roof wash, 10 east-side roof wash.
- West-side unshielded patio lighting: 5 on exterior building wall, 11 on glass patio perimeter wall.

The west-side roof-mounted floodlights illuminate a large swath of state beach and the surf beyond. Anyone wishing to enjoy natural moonlight and stars will be disappointed here. Lighting of the beach and ocean can be a hazard for avian species, particularly migrating birds. Even though the roof-mounted floodlights have been removed for now, the extensive new patio lighting is not dark-sky compliant, and impacts the otherwise natural beach. Anyone wishing to use the walkway and stairs along the west side of the restaurant will be blinded by the glare and unable to watch their footing.

The north and south-side floodlights shining on the parking lots create glare for highway drivers and anyone walking in the area. This type of lighting is useful for viewing outward from the source of light, but is blinding for anyone walking towards the light. The parking lot lighting should be downward directed within the lot.

Landscaping -- Rather than the non-native (with some potentially invasive) species in the plan we urge use of locally-adapted native species throughout the project. The proposed Monterey cypress is not native to our coastal bluffs. Any additional trees will unnecessarily block ocean views from the scenic highway. Shrubs such as coffeeberry, with a height of no more than 4-5 ft, would be appropriate to screen the parking lots from the scenic highway without further blocking coastal views.

On the west side of the parking lots, only low-growing landscaping should be allowed, so as not to obstruct ocean viewing from parked cars on stormy days. There are two plant species colonizing the riprap now, a low sprawling native blue-flowering Ceanothus, and the taller view-blocking invasive non-native pittosporum that has escaped from the existing landscaping. We recommend removal of the pittosporum and planting more of the low-growing Ceanothus to cover the riprap.

Thank you for the opportunity to comment.