

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: April 12, 2017

To: Supervisor Don Horsley
Steve Monowitz, Community Development Director

Cc: Nancy Cave, CCC North Central Coast District Manager

From: Midcoast Community Council/ Lisa Ketcham, Chair

Subject: **Neighborhood Commercial (C-1/S-3) Zoning Standards for Midcoast --
Follow-up to MCC 3/22/17 letter and 3/29/17 County reply**

We have seen the results of case-by-case efforts to protect Midcoast community character from oversize development that existing zoning standards allowed. We have seen the belated zoning updates driven by those irreversible disappointments. We have seen other districts where the County stepped in with an urgency ordinance to delay development until appropriate zoning amendments are in place.

Midcoast community character is seriously threatened by out-of-scale development proposals that fit within the outdated inadequate development standards of our neighborhood commercial zoning districts. LCP visual resource policies and stormwater regulations cannot be relied on to satisfactorily override the C-1/S-3 zoning regulations, which we see demonstrated in the 7th St. Montara hotel proposal.

At the rate new oversize development is being proposed, there is no time to lose. An update of C-1 zoning regulations is do-able and long overdue.

Midcoast neighborhood commercial districts serve as gateways and focal points for the residential neighborhoods that surround them. Development standards should be at least as protective of scale and neighborhood character as the Coastside Commercial Recreation (CCR) district, which has been comprehensively analyzed and updated several times.

In the robust visioning process for Plan Princeton, the community was clear that Harbor Village should not be considered appropriate scale for the Midcoast. Presumably Princeton development standards discussed with stakeholders in fall 2015 have been sitting under wraps since then while we await the shoreline management plan. Even without those soon-to-be-updated standards, the CCR, as updated in 1991, is far more protective than the C-1, which has fallen far behind all other Midcoast zoning districts, as those have been updated over the years.

Indeed, the C-1 districts are not isolated, but included in the Midcoast Safety and Mobility Studies, Connect the Coastside, and also Plan Princeton because of the related commercial use. With appropriate development standards we should be able to guide

development of thriving attractive neighborhood commercial districts that enhance, and don't subvert, the unique small town semi-rural character of our Midcoast communities.

At the very least, please consider a near-term effort to amend the following standards to be consistent with other Midcoast zoning updates in which the C-1 was overlooked:

Building height:

Midcoast S-3 overlay district limits C-1 building height to 28 ft, but using the County's default building height averaging method allows 36 ft height at street frontage for proposed Montara hotel. All Midcoast R-1 residential districts (S-17, S-94, S-105) specify the same:

"Building height shall be measured as the vertical distance from any point on the natural grade to the topmost point of the building immediately above."

Midcoast CCR and W districts have similar wording.

The 2012 Midcoast LCP update reduced height limit to 28 ft in the few remaining districts (S-3, RM/CZ, and PAD). Unfortunately, the key sentence specifying method of height measurement was left out, leaving those districts with the default averaging method that results in taller buildings. We believe the intent of the building height revisions in the LCP update was to bring consistency in height limits and their method of measurement for the Midcoast. Surely the lack of clarification in the updates was an oversight and should be remedied as soon as possible.

Setbacks:

Midcoast C-1/S-3 requires no setbacks front, side, or rear. Midcoast residential and CCR commercial districts require side yard setbacks of a combined total of 15 ft with a minimum of 5 ft on any side. At a minimum, Midcoast C-1 should have that standard. Large blank walls next to empty lots or smaller buildings may be OK in Princeton industrial area but not in our neighborhood commercial districts. Neither are solid rows of buildings that take away our views and our sense of place.

Lot coverage limit:

Midcoast C-1/S-3 does not limit lot coverage if there are no dwelling facilities. There is no reason why the C-1 should not be consistent with the CCR commercial district which limits lot coverage by buildings to no more than 50% of the building site, regardless of whether dwelling facilities are included. Even the W industrial district has 60% lot coverage limit.

Lighting:

C-1 has no lighting or any other performance standards (except those applied to Payday loan institutions). The generic DR (Design Review) for neighborhood commercial has no lighting standards either. Midcoast CCR & W require direct rays be confined to the premises. DR for Midcoast residential has even more protective lighting standards. Lighting is a particularly sensitive issue in the Midcoast and should be addressed for the C-1 district. This is important for code compliance as well.