

**CALIFORNIA COASTAL COMMISSION**

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September 15, 2017

Ruemel Panglao, Project Planner  
County of San Mateo – Planning and Building Department  
455 County Center, 2<sup>nd</sup> Floor  
Redwood City, CA 94063

**RE: PLN2017-00320 Associated with PRE 2015-00019 (Point Pillar Project Developer)**

Dear Mr. Holbrook:

Thank you for forwarding the County of San Mateo's PLN2017-00320 permit referral form dated August 29, 2017 and received on August 30, 2017. We appreciate the additional time Dave Holbrook afforded us to complete our review. The applicant is requesting a Coastal Development Permit (CDP), Use Permit, and Grading Permit to locate a 30-space RV park on a 3.35-acre legal, vacant, parcel at the corner of Highway 1 and Capistrano Road in Princeton-by-the-Sea. The proposed project includes thirty RV parking spaces, seven camping spaces, and a single-story, 832-square-foot laundry and restroom facility. Landscape and drainage improvements are also proposed that would necessitate approximately 6,700 cubic yards of cut material to be off-hauled from the site and 3,865 cubic yards of imported fill which would include base rock for beneath the asphalt areas, drain rock for the detention basins and soil for the planting/landscape areas. We would like to provide the following comments regarding the proposed project:

*Land Use*

The proposed project is located on a parcel zoned Coastside Commercial Recreation/ Design Review (CCR/DR). LCP Section 6265 provides that the purpose of the CCR District is to limit and control the use and development of land designated as CCR. The proposed project must be analyzed to determine its conformity with LCP Section 6265 including demonstrating that the proposed project: 1) meets the service and recreational needs of visitors, boat users, and residents seeking recreation in the San Mateo County Coastside area, 2) does not detract from pedestrian-uses while providing safe and efficient vehicular access and parking, 3) is designed to be of an intimate human-scale, and 4) presents a unified design theme appropriate to the location.

The proposed RV Park must be evaluated as an "Other Compatible Use" defined by LCP Section 6266 and provided in LCP Section 6267. Such uses are only allowed if consistent with the purpose of the CCR District, as further detailed above. The RV Park must meet the development standards of LCP Section 6269, including for coastal access (since the site is located between the mean high tide line and the Highway 1, i.e., the nearest public road), the protection of coastal resources, building height, landscaping, and impervious surface. The proposed project must be sited in a manner that maximizes public views of, and access to the shoreline or ocean, as required by LCP Section 6269. We recommend that the proposed RV lot meet the performance standards of LCP Section 6270 including, but are not limited to, noise, lighting, trash and storage, and grading.

### *Traffic*

The proposed project caters to large vehicles that would be driving along Highway 1 and Capistrano Road. A detailed traffic study, dated June 7, 2017, was prepared by Hexagon Transportation Consultants, Inc. to analyze potential traffic impacts associated with the proposed project. According to the study, congestion during AM and Saturday midday peak hours was observed in the northbound and southbound directions along Highway 1. Page 13 of the study states that this congestion does not spill back or cause operational issues at the intersection of the Highway 1 and Capistrano Road. The study should further explain why the congestion does not adversely affect egress from and ingress to Capistrano Road. The Saturday midday peak hour trip generation rate used in the study was based on surveys conducted in March 2017 at comparable RV parks in the Bay Area. Johnson Pier is a main destination for vehicles associated with commercial fishing, including large semi-trucks which mainly access the pier via the intersection of Highway 1 and Capistrano Ave. Since the proposed project would serve large recreational vehicles that would access the site coming from Highway 1, we recommend that the traffic impact analysis address potential conflicts with commercial vehicle traffic that fluctuates seasonally in and out of the harbor. A discussion of the proposed project's impacts to public coastal access (along Highway 1) during the summer periods when the public is likely to travel to the coast for recreational purposes should also be included as part of the traffic impacts analysis. Finally, the proposed project should provide a mitigation plan to address traffic issues during construction and post-construction when the proposed RV Park is operational, consistent with the requirements of LCP Policy 2.52.

### *Recreation/Visitor-serving Facilities*

The LCP provides for the protection of visitor-serving uses within the Coastal Zone. An important aspect of the LCP is to ensure and encourage low-cost recreational opportunities along the coast be available to the public. Recreational vehicle parks are a form of low-cost recreational land use that provides access to the coast. Commission staff is in favor of such uses as they benefit the visitors that may not be in a position to afford more costly facilities such as luxury hotels located in coastal areas. However, there must be a balance between this form of recreational use and the protection of coastal resources.

The proposed RV Park, as a private development, would provide support services to the RV segment of visitors that frequent the coast. It is a recreational facility that would be operated by Point Pillar Project Developers, LLC and as such meets the definition of a visitor-serving facility and the definition of a commercial recreation facility as defined by LCP Policies 11.1 and 11.2. The proposed project must be evaluated to ensure that it is in conformity with the Recreation /Visitor-serving Facilities Component of the LCP including LCP Policy 11.4 which requires that the facility be a necessary visitor-serving facility designed to enhance coastal recreation opportunities for the public and that it not substantially change/alter the natural environment or undermine the unique, small-town, and or rural character of the nearby community.

The use of RV facilities is usually temporary with specific restrictions on the amount of time park users can stay at a facility. RV Parks have the potential to become more residential should occupants not adhere to the specified time limitations on stay. The analysis of the proposed RV Park must consider if and how it is in conformity with the development standards for private recreation and visitor-serving facilities provided by LCP Policy 11.15. Per LCP Policy 11.15, any CDP issued for the RV Park shall include a condition of approval that requires the land owner execute and record a deed

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restriction over the entire parcel specifying that visitor lengths of stays not extend longer than 29 consecutive days and no more than 90 days each year, and that if the use of the parcel is converted to a non-public, private, or member-only use or a program is proposed/implemented that allows extended stays or exclusive use or occupancy by an individual or limited group or segment of the public a CDP amendment shall be required.

The design of roadway signs associated with the proposed RV Park must conform to LCP Policy 11.16 which requires that signs be placed / posted as part of a recreational development, on or near major near major public and commercial recreation areas, to inform visitors of available services. We suggest that the permittee be required to coordinate with the California Department of Transportation and the County regarding requirements they may have with respect to design and location of signs along the coast.

The utilities element of the proposed project must be evaluated for conformity with LCP Policy 11.20 including that it be required to connect to existing public or community water and sewer systems if available, i.e., the Coastside County Water District and Granada Community Services District.

The proposal includes seven campsites. Are the campsites only for those that come to the site in RVs or would car campers and or "walk-in" campers be able to use these campsites as well? The applicant should clarify for whom the seven campsites would be designated.

#### *Visual Resources*

The LCP requires the protection of scenic and visual resources. The proposed RV Park would be sited adjacent to Highway 1, a County Scenic Highway and Corridor (LCP Policy 8.30). LCP Policy 11.20 requires that permitted recreation or visitor-serving facilities have or develop access to a public road in conformity with the Scenic Resources Component of the LCP. The portion of the development which may impact scenic and visual resources must be located on a portion of the parcel that is least visible from Highway 1, least likely to result in a significant impact on views from public viewpoints, and best preserves the visual and open space qualities of the parcel overall. The development, including landscaping, should also be designed so that ocean views are not blocked from public viewing points such as public roads, in this case, the Highway 1 and Capistrano Road, consistent with LCP Policy 8.12. The project design must also conform to the Design Guidelines for Coastal Communities, which include Princeton-by-the-Sea, and regulations of the Design Review Zoning ordinance consistent with the requirements of LCP Policies 8.13 and 8.32.


#### *Biological Resources*

The parcel for the proposed project site, which is located northwesterly of Pillar Point harbor waters, is currently vacant and unpaved. The proposed project must be consistent with LCP policies that are in place to protect marine resources, water quality and sensitive habitats. The applicant must demonstrate that the proposed project's design and operational measures will ensure on-going protection of water quality, adequate treatment of surface runoff, and will avoid adverse impacts on water quality of the nearby coastal waters.

We appreciate the opportunity to provide input on the proposed project. You can contact me at (415)-904-5292 or via e-mail [renee.ananda@coastal.ca.gov](mailto:renee.ananda@coastal.ca.gov) if you have questions regarding our comments.

Dave Holbrook  
PLN2017-00320 (Ron Stefanack)  
Pillar Point RV Lot  
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Sincerely,

A handwritten signature in cursive script that reads "Renée Ananda".

Renée Ananda, Coastal Program Analyst  
California Coastal Commission  
North Central Coast District Office

Cc: Dave Holbrook, San Mateo County