

CALIFORNIA COASTAL COMMISSION

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November 3, 2014

Summer Burlison
San Mateo County Planning and Building Department
455 County Center, 2nd Floor
Redwood City, CA 94063

Re: Plan Princeton - Alternatives

Dear Ms. Burlison,

Thank you for the extended opportunity to provide you with Commission staff comments on the Plan Princeton Alternatives. We appreciate how much effort is involved with this collaborative process to develop a Master Plan for the Princeton area. This stage of the County's planning process has resulted in the development of three alternatives: "Alternative A" (Refined Current Land Use Plan); "Alternative B" (Expanded Visitor-Serving Area); and "Alternative C" (Waterfront and Recreation Focus). We understand that you will develop a "Preferred Plan" drawn upon public input that will then be incorporated into updates for the County General Plan and Local Coastal Program. We would like to provide you with some preliminary comments for your consideration as you work to identify a preferred alternative and develop a proposed Master Plan. We anticipate providing County staff with additional comments and feedback in more detail as you move forward with planning for Princeton.

General

The Coastal Commission's function is to ensure that the state's coastal resources are protected and that the public has access to recreational opportunities within coastal areas. San Mateo County has a certified Local Coastal Program (LCP) that contains policies to protect and enhance coastal resources including but not limited to biological, marine, agricultural, and visual resources. The LCP additionally has protections that afford the public maximum opportunities to access shoreline areas. We are aware that the Plan Princeton will result in updates to the County's General Plan and the LCP (Policies and Zoning Regulations) and will require amendments to the respective planning and regulatory documents. Our comments are therefore provided in the context of, and as related to, the requirements and provisions of some of San Mateo County's certified LCP. All proposed development in the County's Coastal Zone must be conducted in a manner consistent with the Coastal Act and the certified LCP.

Local Coastal Program Policies and Potential Alternatives

We have reviewed the three alternatives; and while a preferred alternative remains to be identified, our preliminary, overarching, comments are provided below. The preferred

alternative must maximize the benefits to the public and ensure that coastal resources are protected and enhanced to the greatest extent possible. The protection of Princeton's existing agricultural areas must be a priority, along with biological, recreational, and visual resources. LCP Policy 5.2, and similarly LCP Policy 5.4, require the County to evaluate "prime agricultural lands" and "lands suitable for agriculture" throughout the Coastal Zone, as defined by the LCP, and designate them as such consistent with these policies. We encourage the County to undertake this assessment for the Princeton planning area through this update planning process. We would recommend that the preferred alternative consider designating "prime agricultural lands" and "lands suitable for agriculture," as defined by the LCP, as Agriculture in any revised Land Use Plan for the Princeton planning area.

Access to and along the shoreline and Princeton's community character are also important elements protected by LCP policies. LCP Policy 2.53 requires the County to develop a comprehensive transportation management plan to address cumulative traffic impacts of residential development in the entire Midcoast, including the Princeton planning area. The current road improvements and land use designations planned for Princeton should be considered in light of the overall implementation of the transportation management plan for the Midcoast area. In addition, we suggest that LCP requirements, in particular development standards, for visual resources and community character be carefully reviewed and updated to provide as much specific and clear guidance as possible. The update should include quantitative requirements where feasible. A good example would be to explicitly define what is meant by a "pitched roof". The LCP should require a specific degree of angle as is explicitly defined for the various districts contained in Chapter 20 (Combining Districts); for example pitched roof under the S-82 District (West Menlo Park) states that no sloped roof shall be less than 20°. Provisions should also be made to define what is meant by "eclectic", as this term can be understood in varying ranges of subjectivity.

We concur with the effort to avoid and protect environmentally sensitive and agricultural lands, which appears to be a common element to all three alternatives. The "Locational Criteria" (policies 10.8 – 10.14) of the LCP Shoreline Access Component requires public safety, fragile resources (e.g. sensitive habitats), and agricultural areas be taken into account when determining appropriate locations for shoreline access. Thus, expansion of roads to accommodate any new access improvements, including trails, multi-purpose paths, and bike lanes should be evaluated for potential resource impacts and designed to avoid resource impacts to the maximum extent feasible.

Alternative A (Refined Current Land Use Plan) includes "minimal improvements" for access along the beach, little change to current land use designations, and improvements for storm water management, to the street along Princeton Avenue and to the north of the Airport. This alternative does not sufficiently improve or maximize vertical access to or lateral access along the shoreline or address the existing erosion issues occurring along the shoreline between Broadway and West Point Avenue. Alternatives B (Expanded Visitor-serving Area) and C (Waterfront and Recreation Focus) both include components that provide for enhanced shoreline access and recreational opportunities. These include a Class 1 trail along Capistrano proposed

under both alternatives. Alternative C incorporates a Class 1 multi-use path along the shoreline. We support an alternative that affords the public a safe, increased amount of opportunities to access the shoreline and harbor waters; therefore an alternative that includes formalized lateral access along the shoreline area, such as a walkway sited immediately landward of the beach and bluff areas is desirable. Both Alternatives include an element that would provide this type of access. The alternatives reflect different approaches to stabilization of the shoreline between Broadway and West Point, i.e., a revetment proposed for east of Columbia Ave. (Alternative B) or a sea wall east of Columbia Ave. (Alternative C). Both alternatives include some beach nourishment or use of dredge spoils. We generally support the limited use of engineered structures for shoreline protective devices; however this is greatly dependent upon the characteristics of a site. The proposed design for shoreline protection and its long-term effectiveness to protect against coastal hazards must be thoroughly vetted.

The LCP Hazards Component defines hazardous areas to include land that is subject to, among other things, dangers from tsunamis and flooding. LCP Policy 9.3 requires that the regulations of the Resource Management Zoning Ordinance be applied to designated geologic hazard areas such as Sections 6324.6 (Hazards to Public Safety Criteria) and 6326.2 (Tsunami Inundation Area Criteria). The LCP requires new development to avoid and minimize hazards. LCP Policy 9.10 requires site specific geotechnical investigations in order to determine appropriate mitigation measures for the remedy of such hazards as may exist for structures of human occupancy. In addition, LCP Policy 9.11 requires new development to be located in areas where beach erosion hazards are minimal and where no additional shoreline protection will be needed. Lastly, the IP Section 6565.17D Design Review Standards direct development to occur outside of flood areas. The design of the preferred alternative and respective land uses should consider potential coastal hazards, including geological hazards, tsunamis, shoreline erosion, flooding, and sea level rise and the potential affects these hazards may have on future land uses. Our position is that any proposed shoreline protection must be applied uniformly and must minimize any impacts to visual and biological/marine resources; as well as reduce any potential to negatively affect public access.

LCP Policy 11.7b identifies marine-related industrial uses as a priority in urban areas designated Coastside Commercial Recreation; and limits the designation of Coastside Commercial Recreation on the Land Use Map in the subdivided land in Princeton west of Denniston Creek only if certain criteria are met including that the land area is needed to support coastal-dependent, commercial fishing and recreational boating activities; permitted development is directly supportive of these activities; and a deed restriction provides notice that adjacent marine-related industrial uses have priority in this area. The preferred alternative should maintain more of the existing marine industrial area to support facilities for the Harbor and other coastal dependent uses while expanding some visitor serving recreational areas as seen in Alternative C. The preferred alternative should also ensure that any expansion of the Coastside Commercial Recreation district is consistent with the requirements of LCP Policy 11.7b.

LCP Policy 11.13 (Trails) has provisions to include the *San Mateo County 2001 Trails Plan, San Mateo County, California* (Trails Plan) in the LCP that establishes a trails program for the

Coastal Zone. The Master Plan must be consistent with LCP Policies of the Recreation/Visitor Serving Facilities Component, including but not limited to, 11.4 (Recreation and Visitor-serving Facilities Permitted in the Coastal Zone), 11.5 (Priority to Visitor-serving and Commercial Recreation Facilities), 11.9 (Oceanfront Land in Urban and Rural Areas), 11.10 (Upland Locations in Urban and Rural Areas), 11.11 (Agricultural Areas - i.e., only permit low intensity facilities to locate adjacent to agricultural operations or undeveloped agricultural land); 11.2 (Sensitive Habitats), and 11.13 (Trails); and the development standards as provided under Policies 11.14 – 11.21. We would like to add that any visitor-serving uses be focused on lower-cost recreational opportunities, to the greatest extent possible.

We recommend that the preferred alternative also be consistent with the County Trail Policies and the County Trail Design and Management Guidelines and their recommendations for implementation contained therein, including but not limited to: 1) ensuring compatibility with the environment by locating, designing, and developing trail routes with consideration of their potential to have environmental, recreational, and other impacts on adjacent lands; 2) considering an alternative trail route if the location of a trail is proposed in a sensitive habitat or wetland and trail use is not allowed by the LCP; 3) providing trail access for a range of potential users; and 4) siting and designing trail alignments and associated facilities to be in harmony with their natural and cultural environment, and to keep esthetically natural characteristics (appearance and values).

The “light industrial” parcel represented in Alternative B has been designated as “business park/light industrial”. This proposed designation should be clarified. It would be helpful for us to have a better understanding of why this change is proposed.

We are very supportive of your efforts to develop a Master Plan for Princeton as it should provide clarity for development activities specifically within Princeton. We expect to participate further with County staff and look ahead to your continued planning updates as you move forward with this process. Please feel free to contact me at (415) 904-5260 if you have any questions concerning these comments.

Sincerely,



Renée Ananda
Coastal Program Analyst
North Central Coast District

CC: Steve Monowitz