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## Midcoast Community Council

An elected Municipal Advisory Council to the San Mateo County Board of Supervisors

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### \*\*\* Discussion DRAFT \*\*\*

To: Camille Leung  
San Mateo County Planning and Building Department  
455 County Center, Second Floor  
Redwood City, CA 94063

Re: Comments on Negative Declaration for PLN2003-00226: Construction of a new manufactured 1,777 sq. ft. single-family residence and associated permits

The above-referenced Negative Declaration should not be approved, for a number of reasons as detailed below. In summary, some of the checklist answers are incorrectly given as “No” or “Not Significant” when in fact they should be “Significant Unless Mitigated”, “Significant”, or “Cumulative”. In addition, and very importantly, if any answers are other than “No” or “Not Significant”, a Negative Declaration (ND) is incorrect and a Mitigated Negative Declaration (MND) and/or an EIR is required. A number of the answers stated in the draft ND are in fact “Significant Unless Mitigated”, therefore an ND is inappropriate and at least an MND must be used. Also, there is a long list of required mitigations, therefore the document must be a MND.

We disagree with most of the “Findings and basis for a negative declaration.” It is worth noting that in February 2002, the Planning Commission denied certification of the ND for a similar project (PLN1999-00082) with virtually identical issues. The P.C. made the findings for denial, all of which apply equally to the project at hand:

- 1. Will result in significant adverse changes in land use, both on and off the project site.*
- 2. Will require and amendment to or exception from adopted general plan, specific plans, or community policies or goals, in that the project does not comply with visual resources policies.*
- 3. Will have significant adverse impacts within a County Scenic Corridor.*
- 4. Will obstruct scenic views from existing residential areas, public lands, public water body, or roads.*
- 5. Will directly or indirectly affect historical resources on or near the site, namely the Burnham plan for El Granada.*
- 6. Will visually intrude into an area having natural scenic qualities.*

Therefore, the P.C. required that the applicants for PLN1999-00082 have an EIR prepared to assess the environmental impacts of the proposed project. Since all of the reasons in that case apply to the application at hand, PLN2003-00226, this project also requires an EIR.

In regards to the findings, we disagree with the report as follows:

- in the case of findings number 1, 2, 4, 5a, and 5b, there will be significant cumulative impacts in regards to encouraging further development within the COSC zoning, and
- in the case of findings 3, 5c, and 5d, there would be significant degradation of the area's aesthetic quality, cause considerable cumulative impact, and create environmental effects which will cause substantial adverse effects on human beings.

We base our conclusions on the following specific items from the Environmental Evaluation Checklist. Section II, Environmental Analysis:

1. Land Suitability and Geology

- 1.e. **Should be "Significant Unless Mitigated."** Historic aerial photographs show that the land of the subject parcel had once been actively farmed.
- 1.g. **Should be "Significant Unless Mitigated."** See 1.e above.

2. Vegetation and Wildlife

- 2.d. **Should be "Significant Unless Mitigated" or "Significant."** Development of the COSC zoned land in El Granada would lead to a significant cumulative effect on wildlife and plant life in the area.
- 2.g. **Should be "Significant Unless Mitigated." or "Significant."** Project does involve clearing of land of more than 1,000 sq. ft. in a scenic corridor.

3. Physical Resources

- 3.d. **Should be "Significant."** Refer to 1.e above regarding earlier agricultural use.

4. Air Quality, Water Quality, Sonic

- 4.c. **Should be "Significant Unless Mitigated."** The development of the parcel for residential use will create a higher level of noise than those currently existing.
- 4.g. **Should be "Significant Unless Mitigated."** Development of this parcel will generate increased surface runoff and the septic system will affect groundwater resources, possibly severely in this area where quality and flow of the aquifer has not been studied. Nearby wells could be adversely impacted.
- 4.h. **Should be "Significant."** Ordinances of the Granada Sanitary District may preclude connection of this project to the public sewer system in the event that the septic system fails.

5. Transportation

- 5.c. **Should be "Significant Unless Mitigated."** The construction of a residential development will result in change in vehicular traffic patterns and volume.
- 5.e. **Should be "Significant Unless Mitigated."** Location of parcel egress across from the El Granada Market driveway will increase traffic hazards.

## 6. Land Use and General Plans

6.d. **Should be “Significant.”** The development changes the land use from passive open space to residential, and sets a precedent for further residential development within this zoning district, which would require the expansion of service utilities in this district.

6.e. **Should be “Significant.”** See 6.d above.

6.f. **Should be “Cumulative.”** Residential development in the COSC district will adversely affect facilities and utilities in the area.

6.g. **Should be “Significant.”** See 4.h above.

6.h. **Should be “Significant.”** Primary Uses in this zoning district and designation of area in Community Plan are for parks and public facilities.

6.k. **Should be “Significant.”** Residential development in the COSC district is not in keeping with the designations and Primary Uses as specified in Community and General Plans. This project requires variances in order to build at all, and is therefore totally incompatible with and the Community Plan and the LCP. Since the size of this parcel is only 20% of the COSC zoning minimum of 2 acres, development of this parcel will result in a density 5 times that of the Land Use Plan and the Local Coastal Program. This COSC land is also shown as “Rural” in a map produced by the San Mateo County Planning Department in 1995 and development on such a small parcel is completely incompatible with rural intensity of development. The Community Plan designation for this land is “Park/Open Space.” It must also be noted that in the LCP Update pending at the Coastal Commission, the COSC zoning will be changed to “El Granada Gateway” (EG), which does not allow residential use at all.

## 7. Aesthetic, Cultural and Historic

7.a. **Should be “Significant.”** Effect on Scenic Corridor, by allowing residential development within the defined open space buffer zone between El Granada and Highway 1, would create a “Significant” impact.

7.b. **Should be “Significant.”** See 7.a above.

7.d. **Should be “Significant.”** Allowing residential development on this buffer area would negatively affect the history layout and intent of the El Granada Burnham Plan.

Because of the above items, we found that, under Section V., Mandatory Findings of Significance, that items 1, 3, and 4 should be checked “Yes”, and that the proposed project MAY have a significant effect on the environment and require an EIR.