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Prepared July 27, 2018 for August 10, 2018 Hearing

To: Commissioners and Interested Persons

From: Jeannine Manna, District Manager
Renée T. Ananda, Coastal Program Analyst

**Subject: San Mateo County LCP Amendment Number 2-SMC-18-0036-1-Part A
(Mobilehome Parks)**

SUMMARY OF STAFF RECOMMENDATION

The County is proposing to amend the Local Coastal Program's (LCP) Implementation Plan (IP) to add a new chapter relating to mobilehome parks (Chapter 26. Mobilehome Park District) and to modify LCP zoning for the one existing coastal zone mobilehome park (i.e., Pillar Ridge Mobilehome Community in Moss Beach). The proposed amendment changes Pillar Ridge's existing Limited Highway Frontage zoning to the new Mobilehome Park zoning, but it would still be combined with the Design Review and Coastal Development districts. Coastal permitting requirements would remain substantially the same in any case. Thus, the new Mobilehome Park District chapter and related provisions should not result in any significant changes in the coastal zone. Staff believes that the new provisions provide better clarity for LCP implementation relating to mobilehome parks and should not have a significant impact on coastal resources, and recommends that the Commission approve the proposed amendment as submitted. The resolution and motion to do so is found on page 3 below.

Staff Note: LCP Amendment Action Deadline

This proposed LCP amendment was filed as complete on June 18, 2018. The proposed amendment affects the IP only, and the 60-day action deadline is August 17, 2018 (pursuant to Coastal Act Sections 30513 and 30514(b)). Therefore, unless the Commission extends the action deadline (it may be extended by up to one year per Coastal Act Section 30517), the Commission has until August 17, 2018 to take a final action on this LCP amendment.

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EXHIBITS

[Exhibit 1](#): Proposed IP Amendment and Map

I. MOTION AND RESOLUTION

Staff recommends that the Commission, after public hearing, approve the proposed LCP Implementation Plan (IP) amendment as submitted. This amendment applies to the IP only, so the Commission needs to make only a single motion in order to act on this recommendation. Thus, staff recommends a **NO** vote on the motion below. Failure of the motion will result in the certification of the IP amendment as submitted and adoption of the following resolution and findings. The motion passes only upon an affirmative vote of a majority of the Commissioners present.

***Motion:** I move that the Commission **reject** Implementation Plan Amendment LCP-2-SMC-18-0036-1-Part A as submitted by San Mateo County, and I recommend a **no** vote.*

***Resolution:** The Commission hereby certifies Implementation Plan Amendment LCP-2-SMC-18-0036-1-Part A as submitted by San Mateo County and adopts the findings set forth below on the grounds that the amendment is consistent with and adequate to carry out the certified Land Use Plan. Certification of the Implementation Plan amendment complies with the California Environmental Quality Act because either 1) feasible mitigation measures and/or alternatives have been incorporated to substantially lessen any significant adverse effects of the plan on the environment, or 2) there are no further feasible alternatives or mitigation measures that would substantially lessen any significant adverse impacts which the Implementation Plan amendment may have on the environment.*

II. FINDINGS AND DECLARATIONS

A. PROPOSED LCP AMENDMENT DESCRIPTION

The proposed amendment would add a new chapter relating to mobilehome parks (Chapter 26. Mobilehome Park District) and would modify LCP zoning for the one existing coastal zone mobilehome park (i.e., Pillar Ridge Mobilehome Community in Moss Beach), changing its zoning from the existing Limited Highway Frontage (H-1) zoning to the new Mobilehome Park zoning designation (MH). Pillar Ridge's current Design Review (DR) and Coastal Development (CD) combining designations would remain. The new MH LCP Chapter identifies provisions for development of new, and operation of existing, mobilehome parks, but does not otherwise modify any coastal permitting requirements. See [Exhibit 1](#) for the proposed IP amendment.

B. LUP CONSISTENCY REVIEW

The proposed amendment affects only the IP component of the San Mateo County LCP. The standard of review for IP amendments is that they must be consistent with and adequate to carry out the policies of the certified LUP. Pertinent LUP policies for review of the proposed amendment include the LCP's Housing and Visual Resources protection policies, including Policies 3.6 and 3.11 with respect to housing and Policies 8.28, 8.30, and 8.32 in regards to visual resources.

In terms of housing policies, the LUP clearly provides for the protection of housing within the Coastal Zone. Policy 3.6 provides for the distribution of affordable units in the Coastal Zone, and requires that a “fair share” of affordable housing units be allocated to both the Midcoast and the South Coast areas of the County. Policy 3.11 specifically provides for the protection of the Pillar Ridge Mobilehome Community, which it designates as an affordable housing site, including by prohibiting its demolition or loss in any way. Policies 3.6 and 3.11 state in relevant part as follows:

Policy 3.6 Allocation of Affordable Units

- a. *In order to reduce home-to-work travel distance within the Coastal Zone, and to encourage shared responsibility for housing by subarea roughly proportional to employment opportunities available in the subarea, allocate the “fair share” as follows:*
 - (1) *In the Midcoast, allocate 50% to the unincorporated area, with no more affordable units to be built in the rural unincorporated area than allowed by Policy 3.24, and 50% to Half Moon Bay.*
 - (2) *In the South Coast, allocate 100% to the extent water and sewer capacities are available.*
- b. *Through the County Planning Department and the Housing and Community Development Division (HCD), cooperate with the City of Half Moon Bay toward achieving its fair share housing allocation.*

Policy 3.11 Protection of the Pillar Ridge Manufactured Home Community

Designate the existing Pillar Ridge Manufactured Home Community as an affordable housing site. Prohibit the demolition or displacement of this manufactured home community.

In terms of visual policies, the LUP also clearly protects visual resources, including community character, within the coastal zone. For example, LUP Policy 8.13 includes special design criteria within coastal communities, including Moss Beach where Pillar Ridge is located. In addition, LUP Policy 8.28 identifies protected scenic corridors, including areas abutting scenic roads, and ensures protection for outstanding views, flora, geology, and other unique attributes. LUP Policy 8.30 also designates the Coast Highway (Highway 1) north of Half Moon Bay where Moss Beach is located as a County Scenic Road and Corridor, and LUP Policy 8.32 requires specific regulation for such Scenic Corridors. These policies state in relevant part as follows:

Policy 8.13 Special Design Guidelines for Coastal Communities

- a. *Montara-Moss Beach-El Granada-Miramar*

- (1) *Design structures that fit the topography of the site and do not require extensive cutting, grading, or filling for construction.*
 - (2) *Employ the use of natural materials and colors that blend with the vegetative cover of the site.*

- (3) *Use pitched roofs that are surfaced with non-reflective materials except for the employment of solar energy devices. The limited use of flat roofs may be allowed if necessary to reduce view impacts or to accommodate varying architectural styles that are compatible with the character of the surrounding area.*
- (4) *Design structures that are in scale with the character of their setting and blend rather than dominate or distract from the overall view of the urbanscape.*

...

Policy 8.30 Designation of County Scenic Roads and Corridors

- a. *Expand existing County Scenic Corridors to include the visual limits of the landscape abutting the scenic road.*
- b. *Designate County Scenic Roads and Corridors as shown on the Scenic Roads and Corridors Map for the Coastal Zone. These are Coast Highway north of Half Moon Bay city limits (State Route 1), Half Moon Bay Road (State Route 92), La Honda Road (State Route 84), Higgins-Purisima Road, Tunitas Creek Road, Pescadero Road, Stage Road, Cloverdale Road, and Gazos Creek Road (Coast Highway to Cloverdale Road).*

Policy 8.32 Regulation of Scenic Corridors in Urban Areas

- a. *Apply the regulations of the Design Review (DR) Zoning Ordinance.*
- b. *Apply the design criteria of the Community Design Manual.*
- c. *Apply specific design guidelines for Montara, Moss Beach, El Granada, Princeton-by-the-Sea, Miramar, San Gregorio, and Pescadero as set forth in Urban Design Policies of the LCP.*

As indicated above, the only existing mobilehome park in the County's coastal zone is the almost 20-acre Pillar Ridge Mobilehome Community in Moss Beach. Mobilehome parks such as Pillar Ridge historically have been, and continue to be, unique residential areas that provide a source of housing distinct from, and generally more affordable than, other types of housing. Pillar Ridge provides affordable housing in Moss Beach and the new zoning designation allows for the continuance of such use, consistent with LCP Policy 3.6 and LCP Policy 3.11. The new MH zoning designation recognizes Pillar Ridge's existing use as a mobilehome park along with uses ancillary and necessary for its operation, and does not affect its status in any way.

In terms of the new Mobile Home Park District LCP chapter (i.e., Chapter 26), it identifies provisions for development of new, and operation of existing, mobilehome parks, including establishing height limits for Pillar Ridge consistent with other residential development in the coastal zone, but does not otherwise modify any coastal permitting requirements. The provisions there, when coupled with the LCP's other provisions related to coastal development, should ensure appropriate protection of coastal resources, including public views, consistent with the LCP.

In short, the amendment provides greater detail related to mobilehome parks, but will not result in an intensification of existing land uses, and doesn't require any physical changes to existing development at Pillar Ridge in order to be consistent with the new zoning. Pillar Ridge will

continue to be used as a mobilehome park, and the new provisions should effectively help to govern its continued use. In conclusion, the proposed amendment to the IP can be found consistent with and adequate to carry out policies of the LUP.

C. CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA)

The Coastal Commission's review and development process for LCPs and LCP amendments has been certified by the Secretary of the Natural Resources Agency as being the functional equivalent of the environmental review required by CEQA. Local governments are not required to conduct CEQA analysis for proposed LCP amendments, although the Commission can and does use any environmental information that the local government has developed. CEQA requires that alternatives to the proposed action be reviewed and considered for their potential impact on the environment and that the least damaging feasible alternative be chosen as the alternative to undertake.

San Mateo County, acting as the CEQA lead agency, adopted an Initial Study and Negative Declaration on September 26, 2017 for the proposed LCP amendment and determined that the amendment would not have significant adverse environmental impacts. Nevertheless, the Commission is required in an LCP submittal or, as in this case, an LCP amendment submittal, to find that the LCP as amended is in conformity with CEQA provisions. This report has discussed the relevant coastal resource issues with the proposed amendment and concludes that the amendment would not result in an intensification of land uses, or have adverse impacts on coastal resources.

As such, there are no additional feasible alternatives or feasible mitigation measures available which would substantially lessen any significant adverse environmental effects which approval of the amendment would have on the environment within the meaning of CEQA. Thus, the proposed amendment will not result in any significant environmental effects for which feasible mitigation measures have not been employed consistent with CEQA Section 21080.5(d)(2)(A).