

## **CALIFORNIA COASTAL COMMISSION**

NORTH CENTRAL COAST DISTRICT  
455 MARKET STREET, SUITE 300  
SAN FRANCISCO, CA 94105  
PHONE: (415) 904-5260  
FAX: (415) 904-5400  
WEB: [WWW.COASTAL.CA.GOV](http://WWW.COASTAL.CA.GOV)



# **Th9a**

**LCP-2-HMB-20-0081-2 (LAND USE PLAN UPDATE)**

**APRIL 15, 2021**

**CORRESPONDENCE**

To: Coastal Commission Staff  
From: Lennie Roberts and Mike Ferreira

Re: Questions and/or suggested modifications to Half Moon Bay Draft LUP (as approved by the City Council, October 20, 2020).

#### Chapter 1 Introduction and Framework:

Page 1-5, Regional Setting and Planning Area: The “Planning Area” is described as encompassing 4,267 acres including the entire City of Half Moon Bay as well as some unincorporated lands “governed by the County of San Mateo but are included for consideration because they are directly related to planning concerns in Half Moon Bay.” The “Planning Area” construct is a relic of 2014 consultants, Dyett and Bhatia. The City has no regulatory jurisdiction over these areas and there is no authority or justification for including these unincorporated County lands. The lands involved are all rural, not urban, and are subject to voter-approved and Coastal Commission certified Measure A (Coastal Protection Initiative of 1986) restrictions. References throughout the document are inaccurate and inappropriate, and should be deleted. Leaving references to the “Planning Area” in the LUP is confusing and could well lead to future claims that “It’s in the LCP, so these lands should be annexed to the City”, which would be contrary to Coastal Act Policies including 30250 and 30254.

Specific concerns include (but are not limited to):

- (1) Table 1-1, page 1-35 Existing Land Uses in the Planning Area indicates a total of **320 acres** in the County unincorporated area, but on page 2-6, the narrative regarding the San Mateo County General Plan states that there are **280 acres** in the “Planning Area”.
- (2) Table 1-1, pages 1-33 and 1-34 i Existing Land Use Pattern and Distribution includes several categories of land use in the Unincorporated County Area that do not appear to have any relationship to the County zoning or existing land use on these rural lands outside Half Moon Bay City limits. Specific categories that do not comport with actual land uses in the County include: Single Family Residential 15 acres, Mixed Use 6 acres, Agriculture Related 32 acres, and Vacant 21 acres.
- (3) Figure 1-9, page 1-34 Existing Land Uses in the Planning Area: This pie chart should be revised to reflect only the percentages of each category of lands within the City Limits.

Half Moon Bay is always able to comment on land planning matters outside the City Limits. The Connect the Coastside (CTMP) planning effort specifically includes current and future land uses within Half Moon Bay as part of its mandate to evaluate the impacts of residential buildout on the capacities of Highway 1 and Highway 92 to accommodate traffic generated by buildout of HMB and the unincorporated Midcoast area while still providing sufficient capacity for visitors to the coast. The urban Mid-coast and HMB are contiguous urban areas that share sewer, water, highway, school, and other services as opposed to snippets of rural agricultural lands that are included in the HMB Planning Area and that should remain rural. (We nonetheless take issue with the CTMP’s inclusion of large rural unincorporated areas between Half Moon

Bay and I-280) which includes major areas that are not even within the Coastal Zone as part of its Planning Area.)

## Chapter 2: Development:

Page 2-2 et seq: Coastal Act Definitions and Policies includes several Coastal Act definitions and policies that are specifically incorporated into the LUP.

We recommend that the following definitions and policies should be included in this group of HMB LUP adopted Coastal Act Policies:

### Article 1 Chapter 1 Definitions:

30107.5 “Environmentally sensitive area”

30113. “Prime agricultural land”

30121 “Wetland” (means lands within the coastal zone which may be covered periodically or permanently with shallow water and include saltwater marshes, freshwater marshes, open or closed brackish water marshes, swamps, mudflats, and fens)

### Article 4 Marine Environment:

30231 Biological productivity and quality of coastal waters, streams, wetlands, estuaries...etc.

### Article 5 Land Resources

30240 Environmentally sensitive habitat areas shall be protected...and only uses dependent on those resources shall be allowed within those areas; development adjacent to ESHA shall ...prevent impacts...

30241 The maximum amount of prime ag land shall be maintained...

30254 New or expanded public works facilities...

### Article 6 Development

30250 New development shall be located....within...existing developed areas able to accommodate it...

30251 The scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance...

30253 New development shall minimize risks to life and property in areas of high geologic, floor, and fire hazard... or in any way require the construction of protective devices that would substantially alter natural landforms along bluffs and cliffs...

We also believe that it would be helpful to include a statement re: Coastal Act Policy 30007.5 that addresses balancing of conflicts between policies of the Coastal Act – which is reserved for the Coastal Commission to determine.

Page 2-8. Figure 1 – Land Use Map. (1) A portion of the Glencreed property owned by the City is proposed to be designated as Residential-Medium Density. All of Glencreed should be designated as Open Space for Conservation, as access to this portion of Glencreed would be

through a mapped wetland/watercourse and would likely involve development within its buffer zone. [discuss CCC interpretation of Bolsa Chica decision] (2) Bernardo Station Residential Land Use Designation in the Final Review Draft July 2020 LUP was Residential Low-Density; this was revised to Residential Medium-Density in the approved LUP. Due to extensive wetlands in this area and lack of sewer infrastructure, the Residential Low-Density designation is more appropriate. (3) The 14.5 acre triangular shaped property east of Frenchman's Creek subdivision and north of Frenchman's Creek was designated in the Final Review Draft July 2020 as Rural Coastal due to its location within the Very High Fire Severity Zone. However, after receiving objections from the property owner, the approved LUP now designates this property as Residential-Low Density. Final Draft LUP Policy 7-68 prohibits creation of new developable lots within high fire hazard zones. To be consistent with this policy and other property designations within the Very High Fire Severity Zone (including Branscomb Farms), this property should be designated Rural Coastal.

Page 2-10 Workforce Housing Overlay is now unmapped but provides policy direction "through policy to specific parcels or portions of parcels suitable for medium or high-density residential development with Horticultural Business, Rural Coastal, Regional Public Recreation, or Public Facilities and Institutions land use designations...." For Horticultural Business and Rural Coastal the overlay "may be applied to certain parcels that are too small to farm, or to portions of larger agricultural parcels most suited for farmworker housing...". Without more specificity as to limitations on number of units and acreage allowed to be converted, this policy appears to be overly broad. (also see further comments on designations for Horticultural Business, Rural Coastal, Regional Public Rec, and Public Facilities/Institutions.)

Page 2-11 Rural Coastal. Permitted uses include...supplemental uses such as research and development, agritourism, and temporary or seasonal uses, agricultural ancillary uses such as barns, animal shelters, and storage facilities, and very low-density residential uses... This designation is established with the LUP update. Some of these uses may be inappropriate or not adequately limited, see comments on Policy 2-88.

Page 2-12 Planned Development. "The designation requires that each PD be master planned comprehensively as a whole with the inclusion of any possible...uses determined prior to approval of any development within the PD area...." "The master plan may be a specific plan, a precise plan, or an existing, previously approved PUD (see Appendix D for more detail).... "PD master plans shall be reviewed and approved as a Land Use Plan amendment requiring certification by the Coastal Commission with the policies of Chapter 3 of the Coastal Act as the standard of review as informed by the PD section of this chapter." "The Land Use Plan provides for a limited range of uses in PD areas in advance of master plan certification such as trails, agriculture, and habitat restoration." "The PD designation covers a total of 802 acres." It would be helpful if this policy explained the difference between a specific plan and a precise plan. Appendix D does not provide this explanation, as it's only a list of appeals to the CCC and their outcome.



Page 2-20: Policy 2-15 Urban-Rural Boundary: This policy should acknowledge that within the City Limits, the LUP is creating an Urban-Rural Boundary. Previously this boundary was coterminous with the City Corporate Limits. The issue of the U-R Boundary is further confused by the inclusion of lands within the unincorporated rural areas of the County as within the City's "Planning Area" as stated above.

Page 2-22, Policy 2-22 Transfer of Development Rights. "Establish a TDR program with intent of retiring lots within PD designated areas outside Town Center where coastal resource constraints may preclude or limit development." Comment: This policy is unnecessary and has the potential to create significant impacts to the Town Center and other unspecified receiver areas that are "outside the Planning Area". If HMB or another jurisdiction wanted to increase residential or other density, they have the normal process of rezoning. The LUP has already allowed for a generous increase in density within the Town Center.

Page 2-22 Policy 2-23 Lot Mergers. "Require lot mergers for contiguous substandard lots under common ownership in order to create standard sized lots for the underlying zone." The Witt and Abernathy decisions determined that adjacent substandard lots in common ownership are not in fact separate legal parcels. The LUP should acknowledge these court decisions and should include a specific policy requirement for proof of parcel legality. This could render Policy 2-23 unnecessary.

Page 2-23, Policy 2-27 Sphere of Influence. "The SOI includes unincorporated Miramar, El Granada, Princeton, Moss Beach, and most of Montara; additional areas for consideration include contiguous developed sites such as Moonridge, the City-owned Johnston House property, and the greenhouse uses at the southeast end of town. Consider the City's SOI in any annexation process or large-scale land use and development projects and work with the SMC LAFCo to make appropriate adjustments to the City's SOI." The directive in this policy to "Work with LAFCo to make adjustments to the City's SOI" is not within the purview of the Coastal Act/LCP and should be deleted. "It's in the LCP" has often been used in the City's political past to give the impression that something has been pre-approved by the Coastal Commission.

Page 2-23: Policy 2-29 Annexations. "Study and consider annexations to the city limits or changes to special districts in coordination with LAFCo ....to ensure consistency with applicable government codes and local policies including the urban-rural boundary." Changes to special districts or annexations are not under the purview of the Coastal Act and LCP; this policy should be deleted. Again, "It's in the LCP" has often been used in the City's political past to give the impression that something has been pre-approved by the Coastal Commission.

Page 2-23 Policy 2-31. Town Center Water Connections. "For new and existing mixed-use or multi-tenant Town Center development, do not require new, non-priority water connections

for non-priority uses where the principle (sic) use of the site or building is a priority use and priority water connections will adequately serve both the priority and non-priority uses.” This is a slippery slope that will be very difficult, if not impossible, to quantify and monitor over time. What criteria would the City use to determine the “principal use”? square footage? Net revenue? What percentage of the building must be devoted to the “principal use”? The LUP should discuss calculation of water in terms of gross volume rather than permit connections. Need discussion of overall water policy, allocations, and priority vs. non-priority connections (Coastal Act Policy 30241(e)).

Page 2-25 Policy 2-37.c. Cabrillo Corners. “Consider appropriate land use options for this low-lying property...that address hazard and environmental site constraints, including but not limited to ingress and egress, ESHA buffer requirements...and flooding resiliency requirements for flood zone development”. This property is designated as Commercial – General. The multiple hazards on this property make it virtually impossible to develop. We suggest redesignation to a more appropriate designation considering the significant constraints.

Page 2-31 – 33 Substantially Developed Planned Developments (Pacific Ridge, Matteucci, Ocean Colony). The LUP proposes that all three of these PDs would allow ADUs “according to the IP”. This is impermissibly vague and defers an undetermined and significant amount of potential development to the as-yet undefined and uncertified IP. [CC&R exemption cancelled by state law. There is an argument that PUDs are not specifically called out by state law as requiring ADU allowance.]

Page 2-37, Policy 2-46 Comprehensive Master Planning. “The entire PD area shall be comprehensively planned as a unit by the City or by an individual landowner(s) with a master plan as follows”.... There is confusion as to whether a specific plan or precise plan must be certified, as subsection b. only refers to master plan certification. Additionally the text for North Wavecrest (page 2-58) would allow separate or phased master plans for areas no smaller than existing paper subdivisions, that also meet other specified criteria. This was added at the behest of a property owner, and would defeat the fundamental requirements of comprehensive master planning.

Page 2-42 Policy 2.56 Constitutional Protections. “Each master plan shall include policies and programs ensuring that implementation of the plan will not take or damage private property for public use, without the payment of just compensation, therefore.” What about lands held by a Land Trust for conservation or open space purposes? The value of these protected lands could be greatly damaged by adjacent development (one example is the Surf Beach RV Park proposal which would leave CLT properties as little islands of open space surrounded by RVs. The value of these properties as open space would be significantly diminished. Also, what about meaning of “planned as a whole” language in current LCP and to what degree that should be carried forward?

Page 2-43 Policy 2-58 Visual Resources subsection b. “Limiting structures to a 15-foot height limit unless an increase in height would not obstruct public views to the ocean from the highway

or would facilitate clustering of development so as to result in greater view protection.” This policy should include an overall height limit, otherwise a proposed structure could be very tall. For example, the proposed parking garage at Dunes Beach would be at least 30 feet above existing ground level - with solar panels on the roof – all of which would be highly visible from Highway One. (per proposed Vesting Tentative Map 8/12/2019)

Page 2-66 Policy 2-86 Consistency with Agricultural Land Use Policies” “Policies and definitions in Chapter 4 Agriculture are specifically intended to supplement policies in Chapter 2”.

Page 2-67 Policy 2-87 Minimum Lot Size: “Determine minimum lot sizes for lands with Rural Coastal and Horticultural Business land use designations on a case-by-case basis to ensure maximum existing or potential agricultural productivity, recognizing that subdivision of lands in agricultural use is discouraged...”. The vagueness of this policy could well invite future subdivision that is inconsistent with long term protection of Rural Coastal or Horticultural Business. One example would be a proposal to subdivide greenhouse buildings that have high revenue crops into many separate “condominium” type ownerships. An overall minimum lot size is necessary for Rural Coastal and Horticultural Business in order to comply with Coastal Act Definition of Development which includes “change in the density or intensity of use of the land”.

Page 2-67 Policy 2-88 Rural Coastal Permitted Uses: “Rural Coastal” is a new category that generally applies to undeveloped parcels that are comprised of prime soils, but in an attempt to address some landowner concerns, this category now includes uses and/or densities of use that are inconsistent with long term protection of agricultural lands. We are concerned about conditionally permitted uses including single family residences at no more than one unit per 15 acres – does this include one single family residence per legal parcel? (Especially in light of ADU entitlements...and future legislation that could include ministerial subdivisions).

Page 2-67 Policy 2-89 Rural Coastal Permitted Supplemental Uses: These uses appear to be permitted “by right”. Some of these uses may be of such a scale and intensity that they would become the de facto primary land use, i.e., “e” Research and development facilities and clinical uses connected to the primary use, including boarding for researchers and students and modest facilities for conducting basic laboratory functions or on-site veterinary care [Giveaway to Branscomb Farms].” Agri-tourism and small-scale lodging also could overwhelm the underlying land use. At a minimum, all of these should only be conditionally permitted uses. There should be an overall limit on allowable area for supplemental uses; earlier draft had a 20% limit, this may be too generous. Temporary events should have a direct connection with the underlying land agricultural use; otherwise events such as “Drive In Movie Nights” which could involve parking of vehicles on prime ag lands and could potentially become the predominant land use. Temporary events and seasonal uses should have a direct relationship to the agricultural use. Numerous Public Recreational uses would not be compatible with agricultural uses: for example, Motorcycle Parks, BMX biking, off-road vehicle courses, etc. Allowable Public Recreational Uses should be clearly defined, and only be allowed through a Conditional Use Permit.

Page 2-67 Policy 2-90 Rural Coastal Permitted Ancillary Uses: The list of ancillary uses includes Lot Line Adjustments. LLAs are a form of subdivision, not a land use. Any allowable Lot Line Adjustment within the Rural Coastal Designation should meet strict criteria of furthering the intent and purpose of the Rural Coastal (Agricultural) designation.

Page 2-68 Policy 2-92 Workforce Housing Overlay – Rural Coastal: This policy (subsection e) includes the critical key requirement that at least one resident of each workforce housing unit shall be an employee of the associated agricultural operation or another agricultural operation within San Mateo County coastside. But we question subsection f regarding non-permanent housing for seasonal farmworkers that does not count toward the maximum number of units allowed under the Workforce Housing Overlay. What are the cited State requirements? Can a landowner devote his/her entire parcel to seasonal farmworker housing?

Page 2-69 Workforce Housing Overlay – Horticultural Business: The density of this workforce housing is a maximum of 16 units per acre, whereas the density of workforce housing in Rural Coastal is 5 units per acre. While greenhouses are generally a more intensive use of land, certain field crops can also require relatively high numbers of workers during harvest season.

Page 2-73: Under Regional Public Recreation, second paragraph, sixth line “eminent threat” should be corrected to “imminent threat”.

Page 2-74: Under Policy 2-102 Workforce Housing Overlay – Public Facilities, subsection “b” first line “is the use” should be corrected to “if the use”.

Page 2-75: Under Policy 2-105 Workforce Housing Overlay – Regional Public Recreation, [Sop to State Parks?] subsection “e” first line “is the use” should be corrected to “if the use”.

Page 5-21 Figure 5-2 Bicycle and Pedestrian Network and Planned Improvements: This Map should include the potential re-alignment of the Coastal Trail inland where the existing pedestrian bridge across the Arroyo de en Medio has failed.

Page 5-23 Policy 5-29. Resource Dependent and Coastal-Dependent Uses: “Public trails and beach accessways are considered resource-dependent uses, unless there is a habitat-specific limitation that precludes development or aggravates hazards.” This policy is inconsistent with the LUP Policy 6-47 Permitted Uses in Riparian Corridors.

Page 5-23, Policy 5-32 Trail Easements: “As part of the development review process, obtain an irrevocable offer to dedicate or a permanent easement for multi-use trails on privately owned property where trails are proposed as part of the Half Moon Bay trail system...”. This policy appears overly broad. The degree of “exaction” depends upon whether the proposed development interferes with existing access, as well as the location and type of proposed development. The Half Moon Bay trail System plan currently has numerous conflicts with environmental resources and agricultural resources that are unvetted as well as opposed by

landowners. At minimum any such maps should identify such alignments as tentative and problematic.

Page 5-24, Policy 5-39. Trail Improvements at Surfers Beach: There is no mention in this policy of the inevitable need to relocate Highway One further inland.

Page 5-25: Policy 5-24 Creekside Trails: This policy would “consider the need for adaptable, non-permanent designs in erosive areas and along meandering creeks...” and “site trails to avoid adverse environmental impacts to riparian corridors and other environmentally sensitive habitat areas...”. Some readers may interpret this language to allow trails within riparian corridors or ESHA; there should be a clear prohibition of location of trails within riparian areas and other ESHA.

Page 5-25 Policy 5-43 Vista Trail: This policy requires preparation of a feasibility study of potential alignments for this trail, and until such study is prepared, trail easement dedication requirements in Policy 5-32 would not apply. The policy should be strengthened to require an Amendment to the LUP for a trail alignment pursuant to such a study, with full avoidance of impacts to ESHA, agricultural land uses, and public safety.

Page 5-39 Policy 5-67 Temporary Events: This policy requires a CDP for temporary events that have the potential to result in significant adverse impacts to public access or coastal resources during the peak summer months. We suggest that there can be significant adverse impacts during the other nine months of the year also, especially if the temporary event is held on open fields or farmlands.

Page 5-40 Policy 5-72 Use Requirements for Overnight Accommodations: This policy limits occupancy of campgrounds and RV spaces to no more than 30 days. How can this limitation be adequately and effectively enforced? It is currently being purposely ignored in light of the “housing crisis.”

We are concerned that the LUP as submitted is missing key mapping of wetlands on private property and text that was included in the earlier Draft LUP. We remain concerned that allowing reduction of required ESHA buffers based on a developer’s consultant biological report is a formula for property owner hired Biologists to fail to document wetlands or other sensitive habitats.

Page 6-37 Policy 6-16: Permitted Uses in Terrestrial ESHA and Terrestrial ESHA Buffers. ...”only uses dependent on the resources within these areas and their buffer zones (i.e. habitat management and restoration, scientific research and educational activities, and low-intensity public access and recreation) shall be allowed there.” Low intensity public access and recreation are not consistent with Coastal Act Section 30240 and should be deleted.

Page 6-37 Policy 6-17 allows reduction of buffer zones: “Terrestrial ESHA buffers may be reduced only where the following can be demonstrated through evidence provided by site-specific evaluation pursuant to Policy 6-8 and only as specified below:

- a. Where the only building site is located entirely within the required buffer; no alternative development site, size, or design is feasible; and the proposed development is compatible with the continued viability of the adjacent ESHA, the buffer may be reduced to no less than 20 feet provided that design alternatives that maximize the buffer width are utilized; or
- b. Where the only building site is not located entirely within the required buffer; no alternative building site, size, or design is feasible to accommodate the development entirely outside of the required buffer; no new adverse impacts to the ESHA will occur; and the reduced buffer would provide equivalent protection of the biological integrity of the ESHA given the site-specific characteristics of the resource and of the type and intensity of disturbance, as conclusively demonstrated by a qualified biologist to the satisfaction of the City and all jurisdictional regulatory agencies; the buffer may be reduced to no less than 50 feet.”

What does the Coastal Commission consider to be a minimum entitlement? What is the value of a single lot that has no power, water, sewer, or roads? Can you put a Tiny Home on it? A yurt?

Page 6-42 Policy 6-40 Permitted Uses in Wetlands includes Public Trails, and Policy 6-42 Permitted Uses in Wetland Buffer Zones also includes Public Trails. This is inconsistent with Coastal Act policies.

There are numerous references in Chapter 6 to “the Planning Area”. This term should be deleted and “City Limits” (or similar term) should be substituted.

New policy that allows sub-areas of a PD to be developed -

**Subject:** HMB LUP Update  
**Date:** Tuesday, January 26, 2021 at 3:31:16 PM Pacific Standard Time  
**From:** Mark Massara  
**To:** KoppmanNorton, Julia@Coastal  
**Attachments:** LUP Update submittal cover letter\_signed.pdf

Hi Julia,

Thank you for the update and for your continuing efforts to assist the City. I'm baffled though about one thing. In all the requests for additional information, you never ask about the City's attempt to "vision" for residential over visitor serving for the Surf Beach/Dunes Beach PD.

Initially, we can probably agree that a "vision" for a PD is not exactly what anyone had in mind when the LUP update was initially underwritten by the CCC. At least, however, if we're going to consider certification of such ambiguous phraseology we should attempt to define what these new zoning vision designations mean (or hybrids may be a better term). That hasn't, to my knowledge, been attempted. What is the standard of review associated with a "vision"?

Moreover, in the City's transmittal correspondence, dated Dec. 3, 2020 (attached below with highlights) the City makes representations that are flat out incorrect, and should be clarified for the record.

First, the City says on pg. 4 that *"Policies for the substantially undeveloped PDs are simplified to provide flexibility in master planning."* Simplified?? Flexible?? Just how is a "vision" supposedly flexible? Forgive me if I'm off base, but as a land use lawyer the PD designation *itself* was supposed to be the most flexible master planning device available. Now, with a "vision" that includes residential development but not Coastal Act priorities like commercial visitor serving.... how is that "more flexible" or simplified?? I can clearly foresee future decision makers all attempting to describe the vision.....

Clearly this effort does not make PDs simpler or more flexible. It makes them more *difficult* plan.

For example, the LUP "vision" for Surf Beach / Dunes Beach is a sly attempt to prioritize residential over visitor serving, and the Coastal Commission should not be fooled. The proposed Development Vision at p. 2-47 in the LUP Update should be revised to include visitor serving uses and should read, "Envisioned land uses for the Surf Beach / Dunes Beach PD include residential, **commercial visitor-serving**, agriculture, agricultural compatible uses."

Second, the City's submittal correspondence on page 5 (paragraph f.) claims the LUP update supports environmental justice via new LUP Policy 1-5. I recommend however that you scratch the surface of this claim in order to expose severe internal inconsistencies with respect to the feasibility of ever achieving any EJ goals related to "providing low-cost overnight accommodations...and low-cost public access and recreation opportunities." As proposed, those uses would be subverted to the "vision" for development of housing at Surf Beach / Dunes Beach under the new LUP. Again, the Surf Beach / Dunes Beach "vision" should be revised to include commercial visitor-serving uses, the long established abiding land use designation by which such amenities are achieved.

Yet even if the CCC were to support the City's explicit goal to prioritize "affordable housing...for the local workforce" above visitor serving uses (which I in no way concede is allowable or preferred under the Coastal Act) and even if the CCC were to approve an LUP update that includes the City's "vision" for "a multi-generational neighborhood with young families, seniors and assorted other household groups of mixed income levels" (LUP p. 2-47) I would appreciate just how is that going to be accomplished with poison pills like proposed Policy 2-58 which limits any future structures to a height of just 15-ft. The City seems to believe that bringing the 15-ft height limit forward from the old LUP is appropriate. However, times have changed. If the CCC is aware of any coastal community wherein affordable housing is able to be constructed with less than 15-ft structures, please advise. Otherwise we should just acknowledge this for what it is: a ruse. No multi-generational mixed income community is going to be constructed



under 15-ft in height. And if it were it would be unspeakably ugly and homogeneous.

Shouldn't we at least *ask* the City to put the flexibility back into the PD? If the so-called "substantially undeveloped PD's" are so hamstrung with policy constraints and inconsistencies how is it possible to think these properties will ever be developed with Coastal Act priority uses?

I would be happy to discuss these issues further and look forward to working with you to ensure the City's LUP can allow for Coastal Act priorities to be achieved.

Mark Massara  
Attorney at Law  
1642 Great Hwy  
SF CA 94122  
Ph: 805 895 0963

[markmassara@coastaladvocates.com](mailto:markmassara@coastaladvocates.com)

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On Jan 26, 2021, at 2:14 PM, KoppmanNorton, Julia@Coastal <[julia.koppmannorton@coastal.ca.gov](mailto:julia.koppmannorton@coastal.ca.gov)> wrote:

Hi Mark,

The City's full submittal can be found at this link: <https://www.dropbox.com/sh/gkts4adwamdkdzh/AACGpc1pkSk-iFIMZWKQbplha?dl=0>, and correspondence with the City on the submittal is attached.

Best,  
Julia

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**From:** Mark Massara <[markmassara@coastaladvocates.com](mailto:markmassara@coastaladvocates.com)>  
**Date:** Saturday, January 23, 2021 at 9:53 AM  
**To:** "KoppmanNorton, Julia@Coastal" <[julia.koppmannorton@coastal.ca.gov](mailto:julia.koppmannorton@coastal.ca.gov)>  
**Subject:** Re: HMB LUP Update

Hi Julia,

Thank you for your email.

I would appreciate copies of all the subsequent submittal information provided by the City re: the LUP update, and any correspondence from your office to the City. Is it possible to obtain copies without a formal records request or would you prefer that I provide a formal request per CA Pub. Records Act?



Thank you,

Mark Massara  
Attorney at Law  
1642 Great Hwy  
SF CA 94122  
Ph: 805 895 0963  
[markmassara@coastaladvocates.com](mailto:markmassara@coastaladvocates.com)

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On Jan 5, 2021, at 2:06 PM, KoppmanNorton, Julia@Coastal  
<[julia.koppmannorton@coastal.ca.gov](mailto:julia.koppmannorton@coastal.ca.gov)> wrote:

Hi Mark,

Happy new year to you as well. The application is currently unfiled, but is very close to being complete. Once it is filed as complete, we have 90 days to take it to a hearing.

Best,  
Julia

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**From:** Mark Massara <[markmassara@coastaladvocates.com](mailto:markmassara@coastaladvocates.com)>  
**Date:** Tuesday, January 5, 2021 at 12:45 PM  
**To:** "KoppmanNorton, Julia@Coastal" <[julia.koppmannorton@coastal.ca.gov](mailto:julia.koppmannorton@coastal.ca.gov)>  
**Subject:** Re: HMB LUP Update

Hi Julia,

Thank you and happy new year. I will prepare materials for your review. What type of a timeline do you expect we're on?

Mark Massara  
Attorney at Law  
1642 Great Hwy  
SF CA 94122  
Ph: 805 895 0963  
[markmassara@coastaladvocates.com](mailto:markmassara@coastaladvocates.com)

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On Dec 14, 2020, at 12:13 PM, KoppmanNorton, Julia@Coastal  
<[julia.koppmannorton@coastal.ca.gov](mailto:julia.koppmannorton@coastal.ca.gov)> wrote:

Hi Mark,

Just wanted to give you a heads up that the HMB LUP update has officially been submitted to us for certification. Please feel free to send any written comments my way, to be included in the project file. Thanks, and happy holidays!

Best,  
Julia

<Mail Attachment.eml><Mail Attachment.eml><Mail Attachment.eml><Mail Attachment.eml>



December 14, 2020

MEMO

**To:** Stephanie Rexing, California Coastal Commission

Julia Koppman Norton, California Coastal Commission

**From:** Philip King, Ph.D., San Francisco State University Dept. of Economics

Sarah Jenkins

**Re:** The Dunes Project at Half Moon Bay

We would like to provide comments on the proposed Dunes at Half Moon Bay project. Although we have spoken with Mark Massara, an attorney representing this project, our comments here are independent; we are not working for Mr. Massara or any other principal engaged with this project.

Dr. King is quite familiar with Half Moon Bay and San Mateo County (SMC). He lived in SMC for two years and frequently visits his in-laws in Redwood City, San Mateo, and Foster City. He has also conducted research on the economics of sea level rise in San Mateo County: (1) he completed the economic analysis for the [Pacifica local coastal program with ESA](#)<sup>1</sup> which indicated that retreat was a cost-effective solution in four out of seven planning areas; (2) he is currently working on a similar project in West San Mateo County (with Dave Revell).

Our initial reaction to the [plans](#)<sup>2</sup> was similar to many other people's reactions; it looks like a high-cost, luxury resort with an "affordable" glamping option, as well as a youth hostel of the type many of us stayed at in our twenties. Although some of the accommodations in the hostel and for camping may be relatively affordable, **this project does not appear to have attracting underserved households in mind**. Furthermore, the current site plan appears to segregate high-

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<sup>1</sup> [https://www.cityofpacifica.org/depts/planning/sea\\_level\\_rise.asp](https://www.cityofpacifica.org/depts/planning/sea_level_rise.asp)

<sup>2</sup> <https://www.hksinc.com/what-we-do/case-studies/the-dunes-at-half-moon-bay/>

paying customers from low paying customers in much the same way the airline industry does today. Table 1 below presents what we consider to be good and bad examples of inclusive commercial visitor services (CVS). On the one hand, most commercial airlines and many luxury hotels go out of their way to make high paying guests insulated and exclusive. But one can look at other commercial visitor serving industries and find examples of more inclusive approaches, as shown below.

**Table 1: Attributes of Inclusive Commercial Visitor Services**

| Attribute     | Well Designed CVS                     | Poorly Designed CVS                     | Good Example       | Poor Example       |
|---------------|---------------------------------------|---|--------------------|--------------------|
| Public Spaces | Inviting and Open to All              | Segregated by Class                     | Disneyland         | Most Airlines      |
| Services      | Available to all w Low Priced Options | Some services excluded or too expensive | Food Trucks        | Most Luxury Hotels |
| Diversity     | Has Diverse Visitor Profile           | Primarily Serves the Privileged         | Fast Food Industry | Many Country Clubs |

We also believe that the architecture of this site, in combination with the fact that the site architect has previously designed several luxury resorts<sup>3</sup> forced us to question the extent to which the Dunes project would serve to improve access to the coast. The model for such a location should not be the luxury hotel industry, nor the airline industry, with an entirely different experience and class of services for those who can afford it, but something which offers enjoyable coastal recreation opportunities to all.

**Importantly, however, we do not think the Dunes Project should be rejected all together. Coastal Access in California needs to be improved, and one of the main barriers to coastal access for many is the lack of accommodation. With modifications, we believe this project could serve to improve access for all, especially given the lack of lodging in Half Moon Bay.**

Our work on coastal projects has largely revolved around the issue of *access*. Specifically, the stipulation of “maximum public access<sup>4</sup>” in Article 2 of the California Coastal Act. While that requirement in theory protects and incentivizes the promotion of public access, it often conflicts with other provisions in the Coastal Act which protect existing development (see *CA Pub Res Code §30210*, and *CA Pub Res Code §30235*). As much of the coast is already

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<sup>3</sup> According to their website, HKS’s hospitality projects primarily serve the luxury sector, including multiple Four Seasons (Kauai, Sao Paolo, Bahamas etc.), Waldorf Astoria hotels such as that in Los Cabos, and other boutique accommodations in exotic locations. In fact, the original architects of the Ritz Carlton in Half Moon Bay (Hill Glazier Architects) merged with HKS in 2007 (<https://www.hksinc.com/what-we-do/case-studies/ritz-carlton-half-moon-bay/>).

<sup>4</sup> CA Pub Res Code 30210

developed, this conflict limits the ability of the Coastal Commission and other agencies to promote and protect coastal access. In cases where new development is proposed, however, the Commission is in a unique position to use the initial permitting process to increase access as a condition of coastal projects. We believe the Dunes at Half Moon Bay offers the Commission such an opportunity, should the option remain on the table.

This option, sadly, is eliminated in LUP proposed by the city. While the Dunes project needs to do more, in our opinion, to promote access for all, without this project, the accommodation options in Half Moon Bay barely serve middle-income visitors, let alone those from underserved communities. There are few transit options, and Half Moon Bay is a historically secluded community with a median home value of over \$1.3 million<sup>5</sup>. The San Mateo County Coast and all it has to offer is isolated even for many residents of SMC. With the proposed lack of CVS zones in the LUP<sup>6</sup> and the recent acquisition of one of the only two affordable hotels by the county, the availability of coastal access for those who cannot afford to live in Half Moon Bay or stay the Ritz are few and far between. Not only are underserved communities excluded, so are middle class families. Indeed, we both have friends and relatives who live in SMC who rarely go to the SMC coast, even as they visit Monterey and other coastal areas.

Recent reports underscore the importance of lower cost accommodation in promoting coastal access. Dr. King co-authored the study, [\*Access for All\*](#)<sup>7</sup>, with Jon Christensen which explored the barriers to coastal access, finding the high cost of accommodation to be one of the worst. This study echoes reports by the Coastal Commission and Coastal Conservancy (indicating that economic barriers, in particular the lack of affordable accommodations, limit access to California's coast, and thus subvert the intent of the California Coastal Act (see Commission *Staff Report: Regular Calendar--Sunshine Enterprises LP (Shore Hotel)*). (Report no. 5-18-0872; Ainsworth, John., Susan Hansch, and Madeline Cavalieri. 2016. *Public Workshop: Lower Cost Visitor Serving Accommodation* (California Coastal Commission), and Coastal Conservancy's 2019 *Explore the Coast Overnight: An Assessment of Lower-Cost Coastal Accommodations*). Given that many Californians can no longer afford to live in the Coastal region and high travel

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<sup>5</sup> Zillow.com statistics for December 2020.

<sup>6</sup> According to the September, 2020 LUP "Envisioned land uses for the Surf Beach/Dunes Beach PD include residential, recreation, agriculture, and agricultural compatible uses" but exclude commercial visitor serving

<sup>7</sup> <https://www.ioes.ucla.edu/wp-content/uploads/UCLA-Coastal-Access-Policy-Report.pdf>

costs to visit the coast, overnight accommodation is a central component to coastal access. These studies have found that supply of affordable lodging does not begin to meet the demand. In fact, the number of lower cost rooms have dwindled rapidly over the last 40 years (See: Ainsworth memo, 2019).

The high cost of coastal real estate makes it highly unlikely that new lower cost options will be built in the region. This creates the need for luxury and higher cost residential and commercial visitor serving developments to include measures for providing access for all, allowing those higher costs to subsidize lower cost options. Historically, efforts to enforce this subsidy in mitigating for lost access have largely failed (as well documented in the KCET Program *Access Denied*). Typically, developers mitigate either with large in-lieu fees or off-site projects for lower income visitors. With the Dunes project we believe there is the chance to integrate access promotion into the project design and management, as a prerequisite to approval. That integration would not only better meet the needs of all visitors but help ensure the conditions were met.

For the Commission to have this opportunity, the *option* for the Dunes land to serve for recreational visitors must remain. Our understanding is that the City has rejected the plan, although frankly many of these objections seemed to be aimed at limiting *any* visitor serving development on the coast, despite the fact that the central and west San Mateo coastline has very little access to affordable overnight accommodation. In terms of visitor serving accommodations, Half Moon Bay is most known for the Ritz Carlton, a five-star luxury resort. In terms of “economy” hotels, the Coastside Inn was one of the few options. It has been purchased by the County to provide shelter for homeless people, which is a laudable goal, but reduces access for overnight visitors to San Mateo’s coast.

**The main point we want to make in this memo is that even if current plans for the Dunes project are inadequate, we would urge the City, County and in particular the Coastal Commission to think about what economists and finance professionals refer to as “Optionality.”** Although this term originally referred to the use of stock options, it has come to have a broader meaning in economics and finance, and many of the same ideas apply to economic resilience. **Simple put optionality implies that in the face of an uncertain future which no one can predict, policy makers and planners have options. With the propose LUP**

**amendment, the city will effectively prevent the future zoning of the land on the North end from ever serving visitors, establishing a precedent for denying permits for the project to go forth.** By foreclosing the option of allowing CVS at the site, the Coastal Commission may be inadvertently limiting access to the coast by denying potential future uses that could increase access opportunities.

With this option eliminated, the area where the Dunes project has been proposed will most likely be converted to housing, further limiting coastal access for the general public and those unable to afford living in Half Moon Bay. Our suggestion is not to intervene in the zoning designation, but to merely preserve the potential use for visitors by amending the LUP. We are both familiar with San Mateo County and have spent a great deal of time there, and both of us know that Half Moon Bay is an isolated community. Improving the opportunities for accommodations and access would benefit the residents of many surrounding communities, including county residents. The Dunes project presents an opportunity to implement inclusive design.

### **Options for the Dunes Project**

In our opinion, the project as described is inadequate to provide access for underserved communities. However, **we believe that a few modifications would make a fine project which would increase access not only for affluent households, but also middle-class households and underserved communities.** In particular:

- We believe that the architecture of the project should reflect this inclusiveness, with wide swaths of the landscape devoted to areas which are open to *all* visitors.
- The “affordable” parts of the project need to be designed in a way that is suitable for underserved households.
  - The **hostel** appears small. It’s not clear what options are available for family cooking. Typically hostels have some cooking facilities, but these may need to be expanded. Are there enough rooms suitable for families? The design of bunkhouses that sleep four guests does offer more privacy than a traditional hostel set up, but larger spaces suited to families or groups would help increase access, especially if there were additional amenities like cooking or laundry.

- The **camping** appears to be “glamping.” Even if camp fees are inexpensive, there are other barriers to camping. We strongly suggest that the Dunes project have camping equipment available at low rentals rates. The addition of cabins or semi-permanent tent-camping should also be explored.
- Although one expects that some facilities may be more available to guests able to pay more (e.g., the spa) and we recognize that the higher income guests will cross-subsidize the affordable accommodations, we believe more effort could be made to make all of the facilities more inclusive. Guest spaces such as pools and dining areas should be open to all, including those staying in the campsite or hostel. Some resort activities (such as yoga, swimming, water aerobics, shows, etc.) should also be advertised and available to all.
- As mentioned above, we believe access to cooking and other facilities (e.g., laundry) is important for many low-income households. This should include (if permissible) outdoor barbeques and picnic tables.
- Typically, high-end resorts have a concierge service. This service should be available to all and these concierges should be trained to help lower income families visit the area on a budget.
- The Agricultural space could be used for many community projects or to support farm-to-table initiatives for the local public schools.
- We also recommend some day-use areas. We believe this project could also be a great venue for weddings and other special occasions for residents of San Mateo County.
- Finally, and very importantly, **we strongly recommend that the percentage of underserved households be monitored, and targets be set.** The most unobtrusive way to do this would be to ask all visitors for their home zip-code. We suggest setting targets. For example, in the first year 12% of all visitors must be from underserved communities. This target should be increased to approximately 20% of all visitors, or possibly of all visitor days (not the same metric).



In the permitting process the Coastal Commission not only can but *should* be specific in the access conditions it has for development projects and try to integrate access into project design and management, as demonstrated here. It is important to note that community buy in is also important. This extends not only to the surrounding residents of Half Moon Bay (as locals often prevent projects from going forth) but also to underserved communities who would benefit from the Dunes' options, particularly the Latino community and residents in inland areas such as Tracy, Stockton, and Sacramento. Keeping the option for the Dunes to serve visitors and coastal recreation leaves open the option for the Commission to meaningfully increase access in the area and work with these communities.

## **Taxes**

In my analyses for the Coastal Commission and others I often estimate the tax impacts of a project as well. I do not have sufficient data to estimate tax impacts, but I believe they will be substantial, in particular the transient occupancy taxes generated by this project. 100% of these taxes (currently 12%) go directly to the City of Half Moon Bay. These taxes can be used to finance coastal resilience, help create more affordable housing options, and address some of the nuisance issues mentioned by various constituents in Half Moon Bay.

## **Conclusion**

Although the current plans for the Dunes project are flawed, we urge the Coastal Commission and other agencies to look at the potential for this site. We envision a project which incorporates the idea of access for all to the coast. Indeed, we think a project promoting access for all would increase Half Moon Bay's resilience.

**Subject:** Best Glamping Spots in California — This Life Of Travel  
**Date:** Friday, October 9, 2020 at 12:20:35 PM Pacific Daylight Time  
**From:** Mark Massara  
**To:** KoppmanNorton, Julia@Coastal  
**Attachments:** Best Glamping Spots in California — This Life Of Travel.pdf

Hi Julia,

Timely article in light of HMB LUP. Note many of these are in the coastal zone, some nearby...

<https://www.thislifeoftravel.com/usa-west-coast/glamping-california>

Mark Massara  
Attorney at Law  
1642 Great Hwy  
SF CA 94122  
Ph: 805 895 0963  
[markmassara@coastaladvocates.com](mailto:markmassara@coastaladvocates.com)

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# Best Glamping Spots in California

Just like you, we love all the **outdoor options** that California has to offer. But sometimes we just want to enjoy nature with the comforts of home mixed with the camping experience. **That's where glamping comes into the picture!**

Here are some of our **top glamping picks for California.**

**Update for 2021:** California is slowly re-opening with some parks, hotels, and glamping spots only partially opened. Each business will have their own safety protocols, so please reach out to the properties individually to see what their processes will look like during these unique times. I hope we all get to find a way to **travel safely this summer and fall in 2021!**

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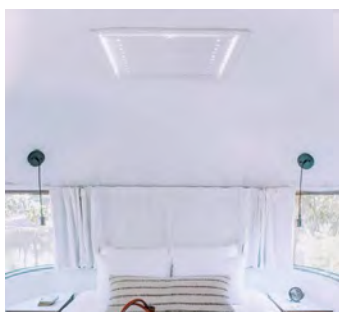
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## AUTOCAMP YOSEMITE



Designed to feel like you're camping but with all the amenities of a hotel, [Autocamp Yosemite](#) offers glamping in **sleek Airstream trailers**, canvas luxury tents, or in larger wooden cabins.

Only a **30 minute drive to the Yosemite** National Park entrance, you can spend all day hiking in the meadows or chasing waterfalls and be back in time for a quick dip in the heated pool or a have a private s'more session at your own fire pit.







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We especially loved having a working fridge, air conditioner, spacious bathroom with shower, microwave, sink, water kettle, and outdoor fire grill pit. It made for some of the best campfire burgers and steaks every night!





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The common area is a glass enclosed, two story architectural masterpiece. At night you'll find it to be a great place to gather around the outdoor fireplace while you swap stories of your day with all the other guests.

Luxury Tents start at around \$200 a night and Airstream suites at around \$280 a night.

[Book your room here.](#)

Also, if you love Yosemite and want more travel ideas, definitely check out our helpful guide for [things to do in Northern California.](#)

**GET GLAMPING READY! SHOP OUR FAVORITES:**



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## DOMES IN THE DESERT

Joshua Tree is famous for its **varied landscapes**, **fantastic hiking**, and **night sky views**. Why not stay in style at this beautifully decked out home, called the [Dome in the Desert?](#)

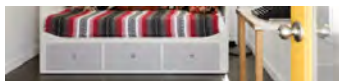
It's also a great place to see the [spring blooms in California!](#)







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It's in the perfect location, close to Joshua Tree and the nearby city of Yucca Valley, while you'll feel like there's no one around for miles.

Some great activities nearby include getting a [sound bath at the Integatron](#), a [Llama walk](#), or a [Hot Spring Sunset](#) experience.

Prices range from [\\$140 to \\$185 a night](#).

## BLUE SKY CENTER





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Located in Cuyama in the **high California Desert**, the Blue Sky Center is a non profit helping out the local community while offering up a fantastic glamping experience.

We absolutely loved our unique wagon experience and falling asleep in the semi-open air to the starry night sky!





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**getting to know your fellow ‘wagoners’** and swapping travel stories.



On top of it all, **you can feel good staying here** knowing your dollars are going to a great organization who’s main focus is aiding in the economic development of the area. They do this through offering free usage of the workshops, commercial kitchen, and classwork to local entrepreneurs and artists.





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[first booking here!](#) (I'll get \$20 credit, so it's a win win!)

## WYLDER HOTEL HOPE VALLEY



This [beautiful property](#) is just south of Lake Tahoe and for those who love outdoor activities, perfectly situated in Hope Valley. The owners, John Flannigan and Chet Pipkin bought the resort in September 2019, and have been actively



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**completely** and include beautiful gas stoves, comfortable beds, electronic thermostats, and

beautiful natural lighting. They also have Bamford shampoos, soap, and conditioner which have the most wonderful forest pine smell!

The yurts are colorfully decorated with interior tubs, a stargazing center top, and modern touches everywhere.

If you want to feel like you're **immersed in nature**, pick one of the yurts.

The cabins are closer to the restaurant and main common areas, so if you want a **mix of nature and convenience**, pick one of the cabins. (**Note:** not all of the cabins have been remodeled yet, so it's best to inquire about which cabins have been remodeled before picking one)

There's also a **fantastic sauna** that is driven by a wood burning oven. We definitely took advantage of it after a long day of hiking.

The restaurant (Sorensen's) serves up delicious food - we loved the Burrata Salad, Chicken Marsala Pasta, and Gnocchi!



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Ever wanted to sleep in a [lifesize bird nest](#) while overlooking Big Sur? The nest is reachable by ladder and made by eucalyptus branches with openings to the ocean and sky. At night, the **moonlight and stars** peek through the branches while in the morning, the famous Big Sur fog will swirl through the nest. Bring sleeping bags, pillows, headlamps, and anything else you need to stay comfortable and warm throughout the night. There is a futon mattress on the floor also.

If the nest isn't for you, there are [heated yurts](#) and luxury tents on the grounds also.

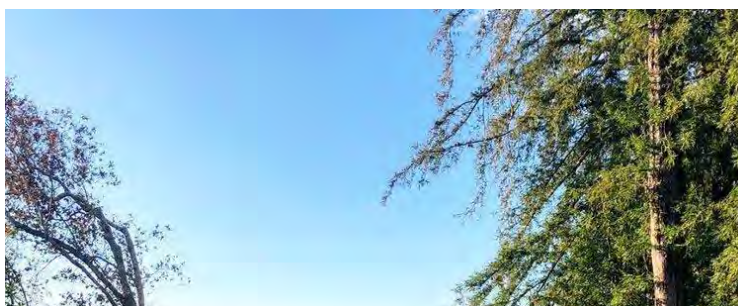




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## VENTANA BIG SUR

A road trip through [Big Sur](#) has always been at the top of any must to do list and for a luxurious glamping experience, [Ventana](#) has you covered. There are [15 safari tents](#) scattered in the 20 acre redwood canyon near the main resort with comfortable bedding, plumbing, propane fire pit, and daily housekeeping. The communal areas of the resort are top notch along with an incredible infinity hot tub facing the redwood grove.







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## RUSSIAN RIVER AUTOCAMP







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A great basecamp for exploring and having Russian River adventures, [Autocamp](#) has set up a beautiful area full of well designed **Airstreams and canvas luxury tents**. The Airstreams are well appointed with comfortable queen size beds, spacious bathrooms, kitchen, living room, and air conditioning. The mid century designed common area is also a wonderful place to start and end the day.

Most importantly, **Russian River** is just steps from the hotel grounds and Russian River / Napa Valley wineries are just a short drive away.

Luxury tents start at \$210 a night and Airstreams start at \$250 a night.

[Book your glamping adventure here.](#)

**Also, check out:**



LOCAL'S GUIDE



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## EL CAPITAN CANYON



About 20 miles north of Santa Barbara, [El Capitan Canyon](#) offers up several types of glamping with just the **right amount of modern conveniences**. You can stay in a round, mongolian type yurt, a wooden cabin, a luxury canvas tent, or a wooden loft.

There is a heated pool, bathroom, fire pits, and activities like whale watching, ocean kayaking, and massages.

Safari tents run around \$170 a night and the yurts go for around \$225 a night.

[Check them out here.](#)



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One of nicest run KOA's in the USA - [this campground](#) offers the most bang for the buck when it comes to staying in one of the deluxe glamping tents or teepees.



Some of the excellent amenities here include a well maintained pool, outdoor rock climbing wall, local peacocks, jumping pillow/trampoline, and super clean bathrooms.

**[Deluxe Tents start at around \\$149 and Teepees](#)**



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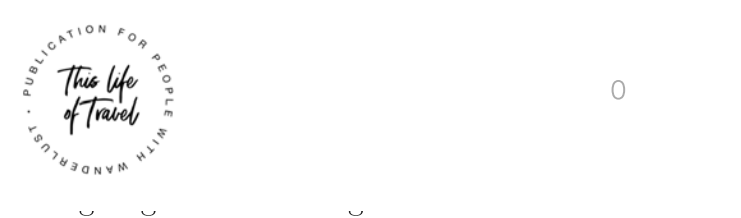
## MENDOCINO GROVE



This [rustic, chic glamping site](#) right off [Highway 1](#) is comprised of 60 luxury safari tents, each outfitted with beautiful interiors, queen beds, wool blankets, and thick down comforters. There are several fire pits to cook at, with the option to dine nearby at Trillium Cafe. The bathrooms are clean and well designed - with white tilework and organic bath products.

With so much to do in the **surrounding beaches, redwood forests, and meadows** - you know you can go all out with the knowledge that a warm





YOU MIGHT ALSO LIKE:



WELLSPRING RANCH





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**digital detox.** There are many activities here such as hiking, horseback riding, surfing, or ocean kayaking. It's also located on an organic farm, so you know you'll eat well here. There's also yoga on offer as well as a large spring water pond.

The glamping options include [round yurts designed in the Mongolian style or silver Airstreams.](#)



There are also two outdoor showers that let you bathe in wilderness that were featured in Dwell Magazine.

Yurts and Airstreams start at around \$180 a night.



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Sierras, run around \$250 per night per person.



## INN TOWN CAMPGROUND



These affordable [glamping tents](#) are a great value for those not wanting to spend too much and still have a great experience! Rates are around \$85 - \$160 a night.

## BOON HOTEL + SPA





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tented rooms are visual treats with all modern comforts you'd want. A beautiful pool is the focal

point during warm days while the **excellent spa** is there to pamper you in every way.





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breakfast that includes biscuits that made it to Oprah's Favorites list.

## SAFARI WEST WILDLIFE PRESERVE & AFRICAN TENT CAMP

If you don't have the time to fly to Africa for a safari tented experience - [there's a great option in Santa Rosa with a full range of safari animals and luxury tents.](#)

There are all sorts of animals like zebras, wildebeests, buffalo, giraffes, and more.





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## NICK'S COVE



Watch the sunset while slurping down local **Point Reyes oysters** or feasting on **Dungeness crab** all in the comfort of your own water facing cottage at Nick's Cove.





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You'll love the old seaside style of each cottage here and how perfectly situated it is to explore Point Reyes or Mendocino up north.

## MARY SMITH CAMPGROUND



A kayaking, bird-watching, and nature paradise - [this campground](#) is right near Lewiston Lake and in the Trinity Alps. There are **six glamping cabins** that provide you a luxurious respite from the elements of nature. Inside the cabins are queen beds with down comforters, rugs, and two nightstands. There is also a fire pit, picnic table, coffee table, and two armchairs in the front of each cabin. Rates start around \$115/night.





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One of Napa Valley's best kept secrets is the [Bothe Napa Valley campground](#) with glamping yurts,

spring fed pool, outdoor fire pits, and clean bathrooms.



You can reserve these yurts up to 7 months in advance and they start at around \$55 a night.

## WATSONVILLE TREEHOUSE



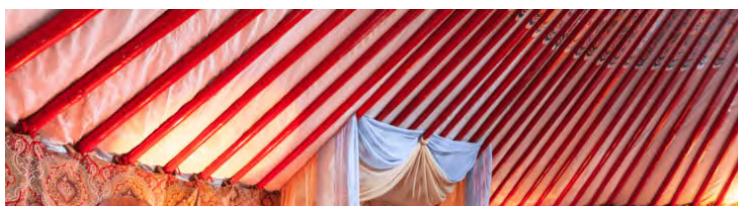


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If you're looking for a [beautiful tree house in the Santa Cruz](#) mountains - check out this natural escape, complete with jacuzzi, queen size bed, kitchen, bathroom, and amazing views.

## MONGOLIAN YURT





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A colorful splash of Mongolia - [these yurts](#) are just the right place for those seeking an escape from the normal.

## OZ FARM



A [special place with several cabins and some glamping yurts](#) - this is a great place to get away since it's located on a working farm with over 230 acres to explore. There is also a fully equipped kitchen for guests to use.





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**Located right on Yuba River** - there are two cabins that have mini kitchens for your usage. Nearby there is a shared bath house with hot showers and composting toilets. All the electricity comes from solar.



## BASECAMP INDOORS TENTED ROOM



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If you've ever wanted to 'camp indoors' -  
[Basecamp at Tahoe](#) will let you do that.

## VINEYARD TREEHOUSE





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Ever wanted to [camp comfortably in a vineyard](#)? You can do that in this treehouse overlooking Monterey Bay! It has a comfy queen

bed, electricity/wifi and an amazing view. There is a full bath accessible to guests at the house right nearby.

#### YOU MIGHT ALSO LIKE:

[Los Angeles to San Francisco Road Trip](#)

[San Francisco to Tahoe](#)

[Things To Do in Sonoma](#)

#### GET GLAMPING READY! SHOP OUR FAVORITES:







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COMMENTS (3)

Newest First

Preview

Post Comment...




**Outside Inn**

A year ago

· 0 Likes

Thanks for including the Inn Town  
Campground in your round up.

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**Abraham de Alba**

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Great !!!  
Would be very useful to have a Google Maps  
link in order to have an idea where each of  
them are. Keep the good work



0

a Google Maps link coming for each soon! :)

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0



**Subject:** HMB LUP CC Hearing

**Date:** Tuesday, October 6, 2020 at 3:39:27 PM Pacific Daylight Time

**From:** Mark Massara

**To:** KoppmanNorton, Julia@Coastal

---

Attachment available until Nov 5, 2020

---

Hi Julia,

I wanted to attach my powerpoint slide presentation for tonight's HMB City Council meeting.

Since all the members of the Planning Commission and City Council have declined to speak to me, or even reference the Surf / Dunes PD in their hearings, and have not commented on the need for affordable commercial visitor serving recreation opportunities, I thought I would try something a bit different tonight by showing pictures.

After last week's meeting when we were accused of trying to build "Waikiki" style high rise towers at Surf / Dunes, I thought a few pictures might be worth a thousand words.

Attached are pictures of El Capitan Canyon and Flying Flags Campgrounds in Santa Barbara County. The El Cap project is one I represented and helped develop. Note that *both* are "agriculturally themed" campgrounds but *query* whether either could have been developed without C V-S or a similar type allowable land use.

[Click to Download](#)

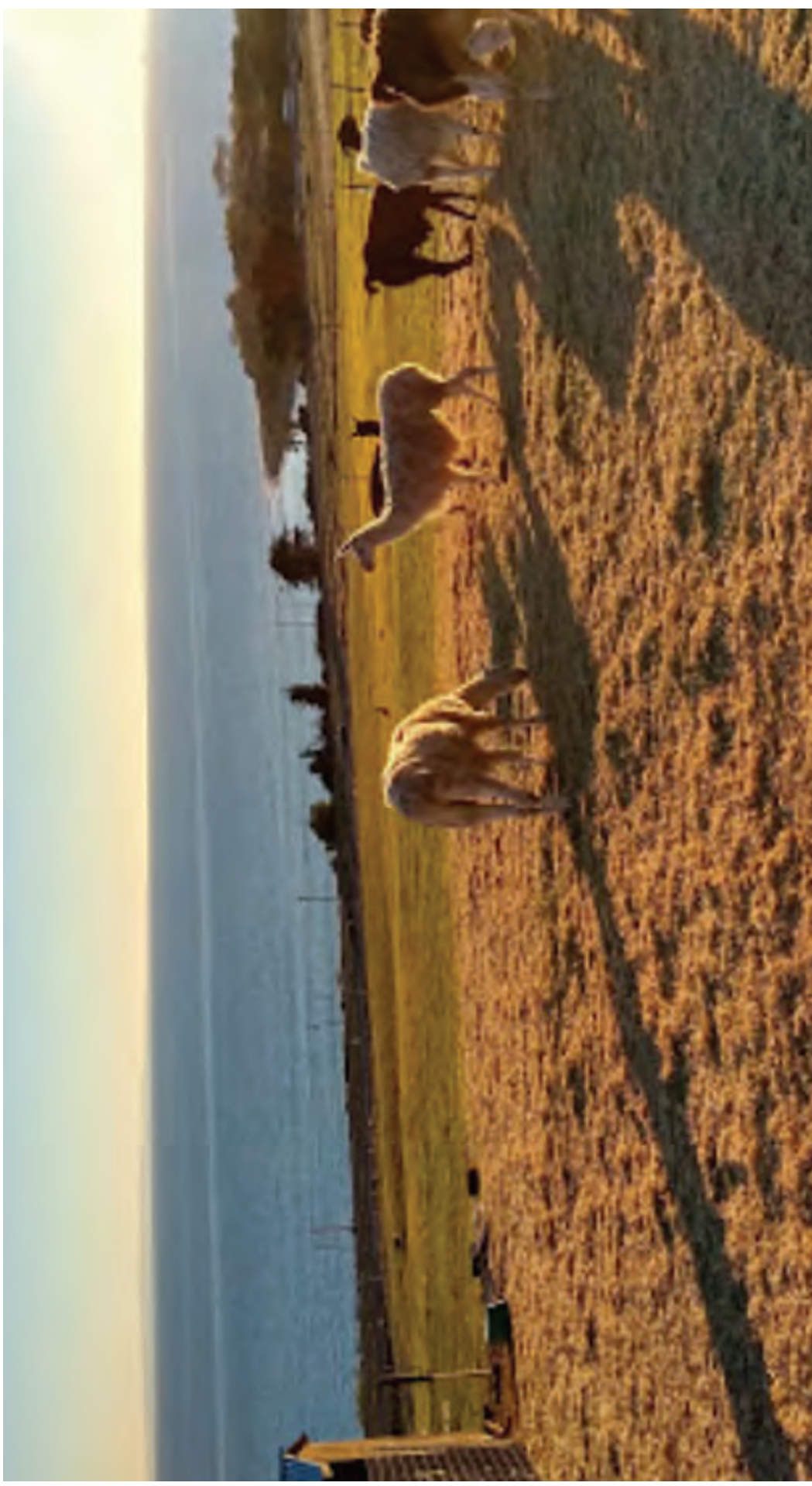
HMB CC PP LUP 10.06.20 (Mark Massara).pptx  
43.6 MB

Mark Massara  
Attorney at Law  
1642 Great Hwy  
SF CA 94122  
Ph: 805 895 0963  
[markmassara@coastaladvocates.com](mailto:markmassara@coastaladvocates.com)

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# El Cap: Farm & Campground





# RV Camping



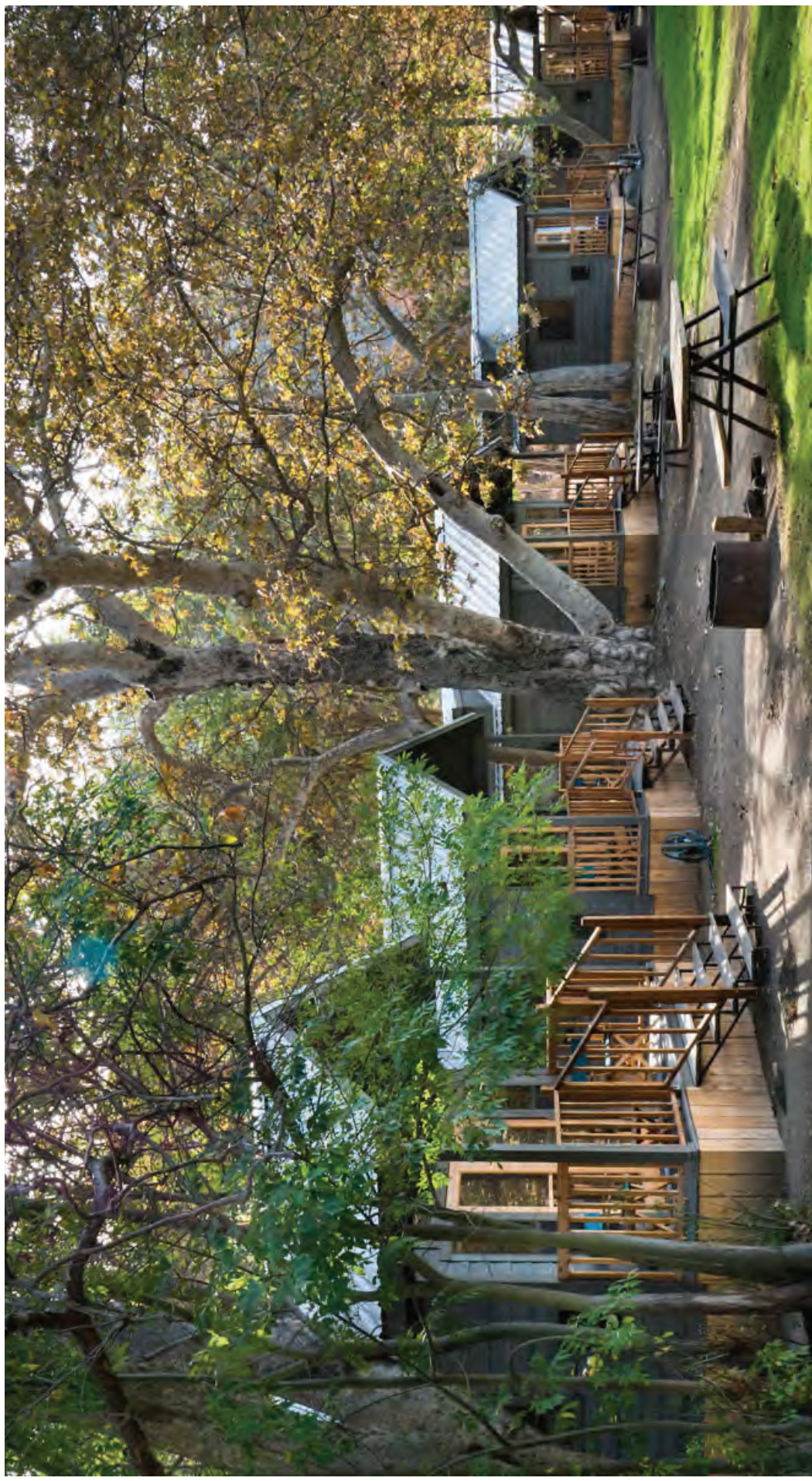


# RV Cabins





# El Cap: Central Village





# Park Model RVs

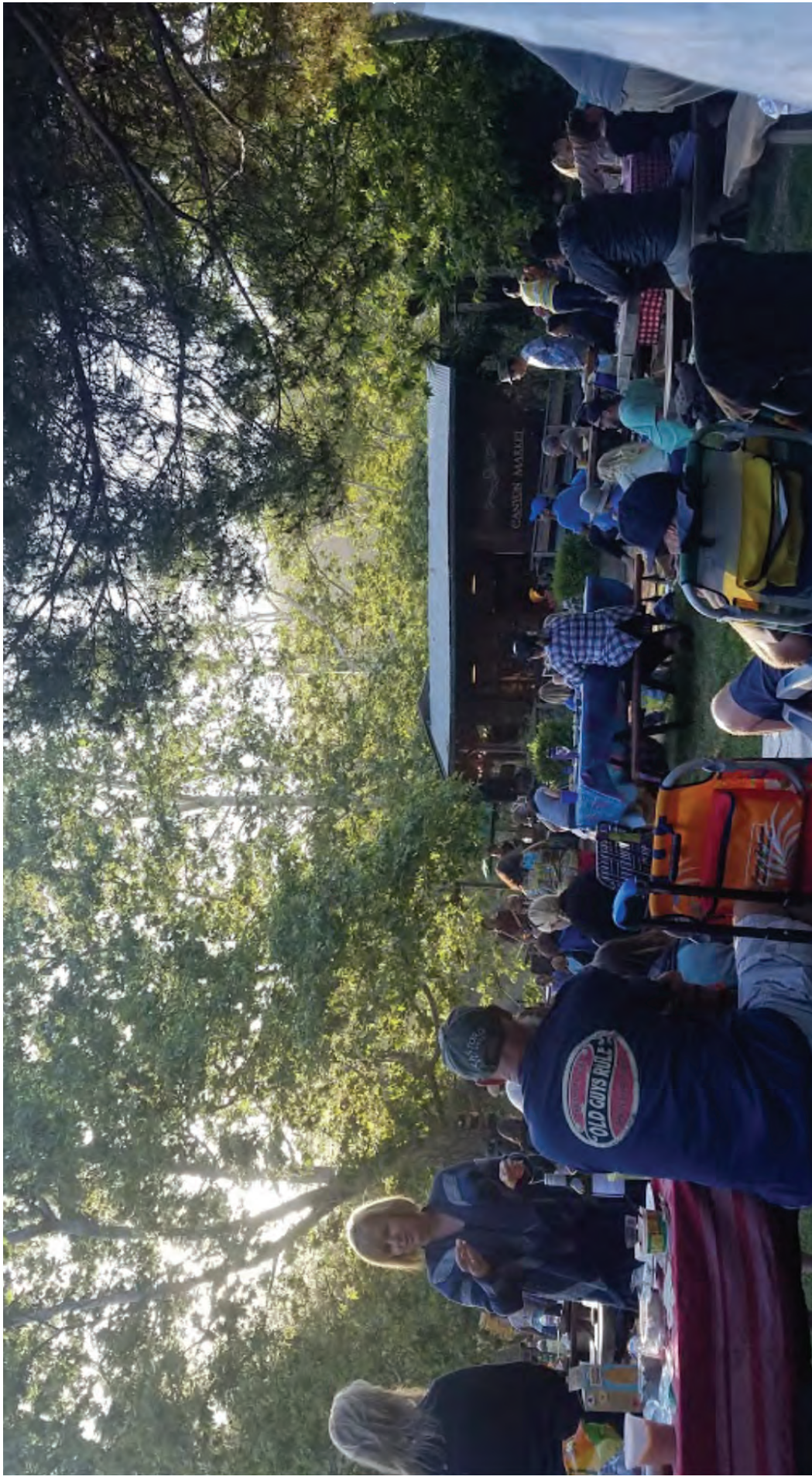


# El Cap





# El Cap: Fun for Residents & Visitors





\*Santa Barbara coast getaway P. 86

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# Flying Flags Farm Fresh Truck

## Agri-Tourism Theme C V-S





# Flying Flags RV Campground





# Flying Flags RV Cabins





# Flying Flags Picnic Area





# Flying Flags Campfire Cafe





# Flying Flags Pavilion



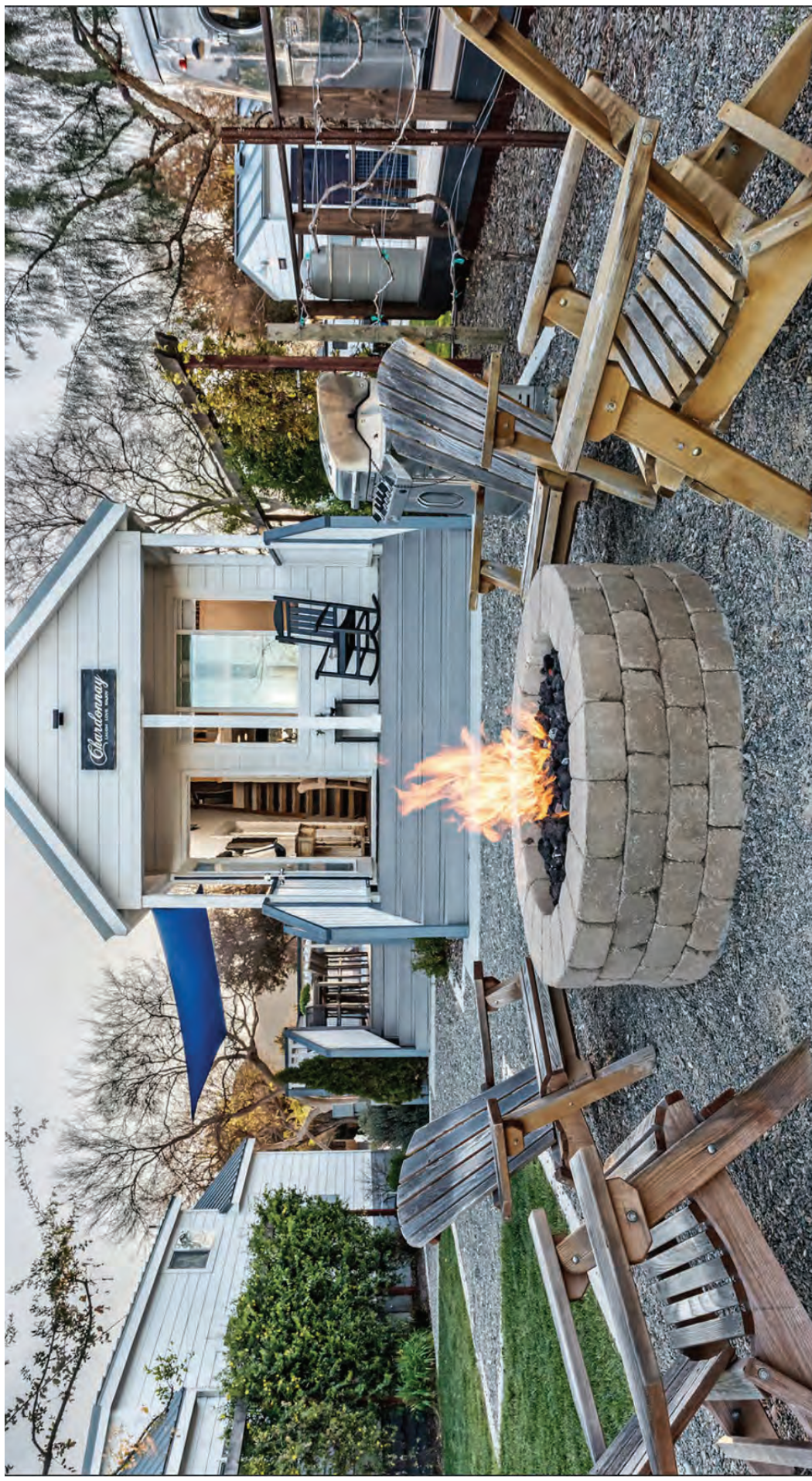


# Flying Flags Maverick's Sign





# Flying Flags RV Camping



**Subject:** Re: Since when is car camping a high end Coastal land use?  
**Date:** Friday, October 2, 2020 at 5:28:47 PM Pacific Daylight Time  
**From:** Mark Massara  
**To:** KoppmanNorton, Julia@Coastal  
**Attachments:** HMBPC LCLUP Crsp. 2 Oct. 2020.pdf

Hi Julia,

Thank you. I tried again in my letter today to really distill it down for the City. I'll attach it. I totally get they loath how Cameron's RV park turned out. But if the "vision" for the Surf / Dunes PD fails to even include the *possibility* of C V-S then we'll be left arguing over a farmstand and housing rather than how we can do the sort of investment to provide assurances that an El Capitan Canyon style "rv park" with bike camping, a hostel and appropriate infrastructure, traffic, view and agricultural protection measures.... which is the discussion that Coastal Act Sec. 30213 should encourage.

I think folks in Miramar are so viscerally opposed to anything that might impact their \$3m houses that they can't even begin to appreciate how an attractive affordable C V-S recreation amenity could be. The irony is that just like El Cap, once built they will all love and use it. And yet for the LUP the City unfortunately isn't willing to try to educate them, or even discuss the future of the property, or the fact that the LUP will vitiate C V-S in north part of the City until at least 2040.

To date I haven't even been able to get them to acknowledge that we exist, much less have the discussion about the future of the PD.

Mark Massara  
Attorney at Law  
1642 Great Hwy  
SF CA 94122  
Ph: 805 895 0963  
[markmassara@coastaladvocates.com](mailto:markmassara@coastaladvocates.com)

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On Oct 1, 2020, at 1:48 PM, KoppmanNorton, Julia@Coastal <[julia.koppmannorton@coastal.ca.gov](mailto:julia.koppmannorton@coastal.ca.gov)> wrote:

Thanks for the update, Mark! Appreciate getting your perspective and getting insight on the hearing.

Best,  
Julia

---

**From:** Mark Massara <[markmassara@coastaladvocates.com](mailto:markmassara@coastaladvocates.com)>



**Date:** Thursday, October 1, 2020 at 9:48 AM

**To:** "KoppmanNorton, Julia@Coastal" <[julia.koppmannorton@coastal.ca.gov](mailto:julia.koppmannorton@coastal.ca.gov)>

**Subject:** Re: Since when is car camping a high end Coastal land use?

Hi Julia,

It turned out later that the power point was highly misleading. Britteny said late in the meeting that the "CCC guidance" regarding RVs being a "high cost coastal land use" was derived from a 2014 CCC report which stated that depending on how RV use is permitted it may be expensive if people have to rent the RV, rent the spot etc. and may have adverse env. impacts if the property is 'paved over'

The power point appeared to be their response to our request that they clearly include C V-S as an allowable use at Surf / Dunes PD, which they declined to do, insisting without basis that a farmstand or small scale 'seasonal' camping might be sustainable.

So it boils down again to the City weaponizing perceived or even invented constraints to attempt to eliminate even a discussion of visitor serving uses in the north part of the city. We heard endless fear and confusion from residents hating on 'tourists' and 'traffic' due to developers building Waikiki Beach high rise resort towers blocking views and access to the beach.... as an excuse to avoid discussing or even allowing future discussion of 40 hostel beds (as proposed) or even more if feasible, bike & car camping etc.

At least Council member Penrose reminded the crowd at one point that the traffic is a result of the residents, who insist on shopping and commuting over the hill, and driving their kids twice a day over the hill to remote schools. She begged people to simply shop groceries local. They said that if people would just ride share to school traffic in the north part of the city would be dramatically improved.

This process is inherently flawed. Again, endless discussion about the need for housing, housing housing and great self congratulations regarding their long "7-year" LCP process and less than 3 minutes (all me) addressing the glaring absence of affordable C V-S.

Mark Massara  
Attorney at Law  
1642 Great Hwy  
SF CA 94122  
Ph: 805 895 0963  
[markmassara@coastaladvocates.com](mailto:markmassara@coastaladvocates.com)

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On Oct 1, 2020, at 9:22 AM, KoppmanNorton, Julia@Coastal  
<[julia.koppmannorton@coastal.ca.gov](mailto:julia.koppmannorton@coastal.ca.gov)> wrote:

Hi Mark,

I was not able to attend the hearing, so I'm not sure exactly what you're referring to. Can you provide a bit more context?

Julia

---

**From:** Mark Massara <[markmassara@coastaladvocates.com](mailto:markmassara@coastaladvocates.com)>  
**Date:** Wednesday, September 30, 2020 at 8:31 PM  
**To:** "KoppmanNorton, Julia@Coastal" <[julia.koppmannorton@coastal.ca.gov](mailto:julia.koppmannorton@coastal.ca.gov)>  
**Subject:** Since when is car camping a high end Coastal land use?

This was one of several incredible moments last night.... When the HMB City Manager informed the virtual universe that car camping is now a "high cost" coastal land use... in support of not allowing C V-S in the north part of the city. Can you provide me with CCC guidance for this new policy??

Mark Massara  
Attorney at Law  
1642 Great Hwy  
SF CA 94122  
Ph: 805 895 0963  
[markmassara@coastaladvocates.com](mailto:markmassara@coastaladvocates.com)

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Begin forwarded message:



**From:** Mark Massara <[markMassara@coastaladvocates.com](mailto:markMassara@coastaladvocates.com)>  
**Subject:** HMB... rv is high end use?  
**Date:** September 30, 2020 at 6:44:56 PM PDT  
**To:** Mark Massara <[markmassara@coastaladvocates.com](mailto:markmassara@coastaladvocates.com)>

Sent from my Verizon, Samsung Galaxy smartphone

<image001.jpg>

**Mark A. Massara**  
**Attorney at Law**  
**1642 Great Highway**  
**San Francisco, California 94122**  
**T: 805.895.0963**  
[markmassara@coastaladvocates.com](mailto:markmassara@coastaladvocates.com)  
[www.markmassara.com](http://www.markmassara.com)

**Via Electronic Mail**

Hon. Mayor Adam Eisen  
City of Half Moon Bay  
City Hall  
501 Main Street  
Half Moon Bay CA 94019

October 2, 2020

Re: Half Moon Bay "Final Draft" LCLUP Update (2020)

Hon. Mayor & City Council,

I represent the majority of the Surf Beach / Dunes Beach PD.

Thank you for your public hearing Tuesday on the proposed Half Moon Bay Final Draft LCLUP update.

We appreciate the enormity of the issues presented, and the sheer number, volume and complexity of land use matters associated with the report. Despite that we continue to struggle with the failure of the Planning Commission and now the City Council to consider the overwhelming need for affordable commercial visitor-serving recreational opportunities in the north part of the city, and to at least *discuss* the need for those uses and allow the *potential* for those Coastal Act priority uses to someday be realized on the Surf Beach / Dunes Beach PD.

Like the Planning Commission, no member of the Council addressed the elephant in the room Tuesday night. The closest the Council came to the issue was when your staff stated in a power point slide that RV camping was considered by the Coastal Commission to be a "higher-cost" coastal land use. Aside from the fact that this statement is generally incorrect, the question is a matter how such a campground is considered, permitted, conditioned, constructed etc. Obviously, one might imagine a gold-plated RV campground

that could *conceivably* be higher cost<sup>1</sup> yet such reasoning is not a viable justification to *prohibit* and *eliminate* the potential for such uses. That would be like saying that since a hostel *might* charge \$400/night that all hostels should be prohibited. This sort of logic has no serious place in the effort to properly examine the broad range of beneficial uses that the Surf / Dunes PD could support.

Affordable coastal visitor serving recreation *requires*, at a minimum, the *potential* for C V-S zoning or use within the PD. That is exactly what is proposed in the Dunes Beach Specific Plan. It is not a fait accompli or a development concession or “done deal” or anything of the sort. It is simply incumbent that the Council discuss and educate concerned neighbors and fearful residents that the opportunity for affordable C V-S is not the equivalent of a row of Waikiki high rise luxury towers, as you were told Tuesday night by various members of the public.

Again, we merely ask that you *add* recreation and C V-S to the “vision” for Surf / Dunes PD, as set forth in Exhibit A to our September 14 correspondence. You don’t have to delete or eliminate or devalue other envisioned uses, nor should you. Staff’s current “vision” of a farm stand and/or “small seasonal” campground at the PD is not feasible or sustainable, and will result in nothing but residential housing being developed on this ideal visitor-serving site.

Thank you for your consideration of our desire to provide affordable coastal visitor-serving recreation opportunities at Surf Beach / Dunes Beach within the next 20 years, and to make uses like a hostel and bike camping and organic farming a reality. We remain hopeful of securing your support at your upcoming meeting.

Very truly yours,



Mark A. Massara, Esq.

cc: Robert Brownstone, Vice Mayor, HMB, [RBrownstone@hmcity.com](mailto:RBrownstone@hmcity.com)  
Deborah Penrose, Councilmember, HMB, [DPensrose@hmbcity.com](mailto:DPensrose@hmbcity.com)  
Harvey Rarback, Councilmember, HMB, [HRarback@hmbcity.com](mailto:HRarback@hmbcity.com)  
Debbie Ruddock, Councilmember, HMB, [DRuddock@hmbcity.com](mailto:DRuddock@hmbcity.com)  
Julia Koppman Norton, CCC, [julia.koppmannorton@coastal.ca.gov](mailto:julia.koppmannorton@coastal.ca.gov)  
Jill Ekas, Planning Director, HMB, [jekas@hmbcity.com](mailto:jekas@hmbcity.com)  
Brittney Cozzolino, Planner, [bcozzolino@hmbcity.com](mailto:bcozzolino@hmbcity.com)

---

<sup>1</sup> For example, if an RV were charged the same rate as a single round of golf at either of the Ocean Colony courses, then yes, it is true that RV camping could be considered a luxury accommodation under the Coastal Act. But the simple fact we’re even having this discussion underscores the need for the Council to educate staff and the public that C V-S uses *can* provide Coastal Act priority amenities, and that the potential for a mistake like an ultra luxury public car campground – or a public golf course charging \$350/round- is not a reason to attempt to prohibit *all* C V-S uses.

**Subject:** Since when is car camping a high end Coastal land use?  
**Date:** Wednesday, September 30, 2020 at 8:29:50 PM Pacific Daylight Time  
**From:** Mark Massara  
**To:** KoppmanNorton, Julia@Coastal  
**Attachments:** 20200930\_184356.jpg

This was one of several incredible moments last night.... When the HMB City Manager informed the virtual universe that car camping is now a "high cost" coastal land use... in support of not allowing C V-S in the north part of the city. Can you provide me with CCC guidance for this new policy??

Mark Massara  
Attorney at Law  
1642 Great Hwy  
SF CA 94122  
Ph: 805 895 0963  
[markmassara@coastaladvocates.com](mailto:markmassara@coastaladvocates.com)

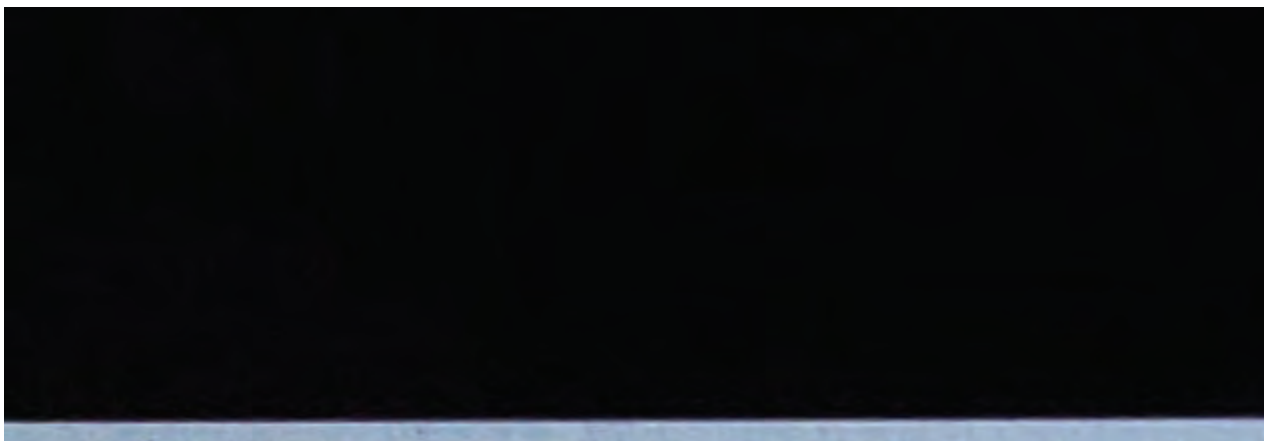
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Begin forwarded message:

**From:** Mark Massara <[markMassara@coastaladvocates.com](mailto:markMassara@coastaladvocates.com)>  
**Subject:** HMB... rv is high end use?  
**Date:** September 30, 2020 at 6:44:56 PM PDT  
**To:** Mark Massara <[markmassara@coastaladvocates.com](mailto:markmassara@coastaladvocates.com)>

Sent from my Verizon, Samsung Galaxy smartphone





September 29, 2020

Mayor Adam Eisen and Members of the  
Half Moon Bay City Council  
501 Main Street  
Half Moon Bay CA 94019

**Re: Local Coastal Program Land Use Plan Public Hearings**

Dear Mayor Eisen and City Council members,

On behalf of Green Foothills, I write to respectfully request that you (1) refer the requests by property owners and their representatives for amendments to the Draft LUP (included in Attachment 3 of the Staff Report) that were received after the Planning Commission's September 8, 2020 meeting back to the Planning Commission for their review and consideration, and (2) provide additional opportunity for all interested members of the public to review and comment.

The Staff Report for your upcoming September 30, 2020 meeting includes **significant revisions to the Draft LUP that were submitted after the Planning Commission's final meeting**, and could not therefore be considered by the Commission. We are particularly concerned about revisions that could potentially facilitate the eventual approval of:

- Dunes/Surf Beach proposed 212-room luxury Hotel/Conference Center and 170-space high end RV Park and Clubhouse on 48 acres at Young Avenue
- Rocket Farms proposed 304 residential dwelling units in 19 buildings (duplexes) on 17 acres directly across Highway 1 from Dunes/Surf PUD, and adjacent to the Frenchman's Creek neighborhood.

Dunes/Surf Beach has already generated tremendous public opposition, due to widespread concerns over gridlocked traffic, loss of irreplaceable prime agricultural land, and impairment of scenic views, among others. The preposterous duplex housing proposal at Rocket Farms appears to have dropped in out of nowhere. Both of these proposals are inconsistent with the city's vision and overarching principles of concentrating new development, particularly housing, in the Town Center.

We greatly appreciate the tremendous amount of work and thought that city staff and the Planning Commission, working with Coastal Commission staff, have put into this document.

We urge you to refer these major changes back to the Planning Commission for their consideration.

Please take the time to get this right.



*Lennie Roberts*

Lennie Roberts, Legislative Advocate, Green Foothills

cc: Jill Ekas, Community Development Director  
Jeannine Manna, California Coastal Commission  
Stephanie Rexing, California Coastal Commission  
Julia Koppman Norton, California Coastal Commission



**Subject:** HMB prioritizes housing under coastal act  
**Date:** Tuesday, September 8, 2020 at 7:28:48 PM Pacific Daylight Time  
**From:** Mark Massara  
**To:** KoppmanNorton, Julia@Coastal  
**Attachments:** 20200908\_192441.jpg

I believe we're breaking new ground here. Last night it was announced that the "Coastal Commission had confirmed" that farmworker housing is a Coastal Act priority use. Even had a slide to memorialize it.

Who knew?

Mark Massara  
Attorney at Law  
1642 Great Hwy  
SF CA 94122  
Ph: 805 895 0963  
[markmassara@coastaladvocates.com](mailto:markmassara@coastaladvocates.com)

Sent from my Verizon, Samsung Galaxy smartphone





**Subject:** HMB LCLUP

**Date:** Tuesday, September 8, 2020 at 2:37:23 PM Pacific Daylight Time

**From:** Mark Massara

**To:** KoppmanNorton, Julia@Coastal

Hi Julia,

Having just seen your letter to the HMB Planning Commission regarding the LCP I wish I had had an opportunity to discuss with you prior. Could you please give me a call at the number below? I would very much like to discuss my analysis which shows that the LUP, taken as a whole, involving a myriad of proposed policies, will eliminate the potential for C V-S recreation in the north part of the City over the next 20 years. I'm very surprised that CCC staff could support such a result and believe the natural outcome of certification of the LUP will be that the Dunes portion of the Surf/Dunes PD will default to housing given HMB's "development vision" of "residential" use.

Look forward to speaking with you.

Mark Massara  
Attorney at Law  
1642 Great Hwy  
SF CA 94122  
Ph: 805 895 0963  
[markmassara@coastaladvocates.com](mailto:markmassara@coastaladvocates.com)

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**Subject:** Despite warnings, visitors seek relief on coast | Local News Stories | hmbreview.com  
**Date:** Wednesday, August 26, 2020 at 1:58:58 PM Pacific Daylight Time  
**From:** Mark Massara  
**To:** KoppmanNorton, Julia@Coastal  
**Attachments:** 5f42d2ff9fd81.image.png

to individually address dozens (100s?) of individual policy proposals that taken together are either strategically designed, or perhaps just in the name of attempting “preserving community character,” have the very obvious result of continuing and exacerbating the existing housing/visitor serving imbalance and preventing any new C V-S uses from ever being realized.

More to follow.... that’s for certain.

[https://www.hmbreview.com/news/despite-warnings-visitors-seek-relief-on-coast/article\\_d98d42d2-e57f-11ea-8246-9b68a20cd47c.html](https://www.hmbreview.com/news/despite-warnings-visitors-seek-relief-on-coast/article_d98d42d2-e57f-11ea-8246-9b68a20cd47c.html)





Mark Massara  
Attorney at Law  
1642 Great Hwy  
SF CA 94122  
Ph: 805 895 0963  
[markmassara@coastaladvocates.com](mailto:markmassara@coastaladvocates.com)

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**Subject:** Re: HMB Final Draft LCLUP Study Session

**Date:** Monday, August 3, 2020 at 10:55:27 AM Pacific Daylight Time

**From:** Mark Massara

**To:** KoppmanNorton, Julia@Coastal

**CC:** Rexing, Stephanie@Coastal, Manna, Jeannine@Coastal, Kahn, Kevin@Coastal

Hi Julia,

Thank you for your email. We're going to reach out to Jill and Brittney for a meeting and clarification first, and then hopefully we can meet shortly thereafter to discuss with you. Since we already have a Specific Plan proposal pending for Dunes / Surf Beach, it shouldn't be difficult to determine how it would be impacted by the proposed LCPA.

What concerned me about the hearing last week was the universal support from the Planning Commissioners for comments of Commissioner Hernandez whose self described "many years" of familiarity with the process was more than sufficient for a decision, and that "any person asking for more time to evaluate the LCP is either willfully ignorant or desperate."

Given that neither the public nor the Commissioners had fully read the document (parts of which were not even available yet), caused me to think we should be especially deliberative with respect to this process.

At the end of the day the Specific Plan for Dunes / Surf Beach is a proposal and an attempt to move away from the small lot residential APNs and to balance incorporating lower cost visitor recreation and agricultural uses like a hostel and a small a farm *with* a mix of uses that can provide sufficient economic return to underwrite the lower cost recreation consistent with the Coastal Act. And while of course we want to be flexible with respect to specific uses and the location of such uses, if the LCP inadvertently prohibits uses designed for the general public in order to advance neighborhood community priorities, that would have the undesirable effect of elevating private residential use of the property as well as defeat the entire point of encouraging PD district planning in the first place.

I look forward to discussing the LCP with you further. Thanks again for your assistance.

Mark Massara  
Attorney at Law  
1642 Great Hwy  
SF CA 94122  
Ph: 805 895 0963  
[markmassara@coastaladvocates.com](mailto:markmassara@coastaladvocates.com)

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On Jul 29, 2020, at 4:15 PM, KoppmanNorton, Julia@Coastal <[julia.koppmannorton@coastal.ca.gov](mailto:julia.koppmannorton@coastal.ca.gov)> wrote:

Hi Mark,

Thanks for your email. We have been working with the City throughout the process on their draft LCLUP update, but we are just going through this version ourselves. If you can provide your key points in writing (more specifics on working within the existing PD district designation, how the proposed modifications may adversely impact key Coastal Act policies and priorities, etc as you mention below), that would be helpful for us as a starting point.

Best,  
Julia

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**From:** Mark Massara <[markmassara@coastaladvocates.com](mailto:markmassara@coastaladvocates.com)>  
**Date:** Tuesday, July 28, 2020 at 7:03 PM  
**To:** "KoppmanNorton, Julia@Coastal" <[julia.koppmannorton@coastal.ca.gov](mailto:julia.koppmannorton@coastal.ca.gov)>  
**Subject:** Fwd: HMB Final Draft LCLUP Study Session

**From:** Mark Massara <[markmassara@coastaladvocates.com](mailto:markmassara@coastaladvocates.com)>  
**Subject:** HMB Final Draft LCLUP Study Session  
**Date:** July 28, 2020 at 6:17:43 PM PDT  
**To:** [julia.koppmannorton@coastal.ca.gov](mailto:julia.koppmannorton@coastal.ca.gov)  
**Cc:** Rexing <[stephanie.rexing@coastal.ca.gov](mailto:stephanie.rexing@coastal.ca.gov)>, [jeannine.manna@coastal.ca.gov](mailto:jeannine.manna@coastal.ca.gov), [kevin.kahn@coastal.ca.gov](mailto:kevin.kahn@coastal.ca.gov)

Hi Julia,

Thank you for your correspondence to the City regarding the Final Draft HMB LCLUP. Please see attached correspondence.

As I represent one of the larger land owners in HMB, I would appreciate being able to meet with you regarding our efforts to work within the existing PD District designation, and describe the ways in our view that the proposed LCLUP may dramatically adversely impact key Coastal Act policies and priorities. Thank you in advance for your consideration.

Mark Massara  
Attorney at Law  
1642 Great Hwy  
SF CA 94122  
Ph: 805 895 0963  
[markmassara@coastaladvocates.com](mailto:markmassara@coastaladvocates.com)

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Begin forwarded message:

**From:** Mark Massara <[markmassara@coastaladvocates.com](mailto:markmassara@coastaladvocates.com)>  
**Subject:** HMB Final Draft LCLUP Study Session  
**Date:** July 28, 2020 at 5:42:32 PM PDT  
**To:** [planhmb@hmbcity.com](mailto:planhmb@hmbcity.com)  
**Cc:** Jill Ekas <[jekas@hmbcity.com](mailto:jekas@hmbcity.com)>, [bcozzolino@hmbcity.com](mailto:bcozzolino@hmbcity.com)

Please find correspondence attached.

Mark Massara  
Attorney at Law  
1642 Great Hwy  
SF CA 94122  
Ph: 805 895 0963  
[markmassara@coastaladvocates.com](mailto:markmassara@coastaladvocates.com)

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