CALIFORNIA COASTAL COMMISSION
NORTH CENTRAL COAST DISTRICT
455 MARKET STREET, SUITE 300
SAN FRANCISCO, CA 94105
PHONE: (415) 904-5260
EMAIL: NORTHCENTRALCOAST@COASTAL.CA.GOV
WEB: WWW.COASTAL.CA.GOV

W10b

LCP-2-SMC-26-0048-1 (Midcoast Residential Unit Cap)

November 4, 2026

CORRESPONDENCE

Outlook

MidCoast LCP Amendment

From Clemens Heldmaier <clemens@MWSD.net>
Date Mon 7/6/2026 2:39 PM
To NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>
Cc Ashley, Melissa@Coastal <melissa.ashley@coastal.ca.gov>; Cooper, Isobel@Coastal <isobel.cooper@coastal.ca.gov>; smonowitz@smcgov.org <smonowitz@smcgov.org>; midcoastcommunitycouncil <midcoastcommunitycouncil@gmail.com>

2 attachments (612 KB)
CCC cover letter.pdf; MWSD_Tech_Memo 070626 .pdf;

Some people who received this message don't often get email from clemens@mwsd.net. Learn why this is important

Dan,

I hope this email finds you well.

Please see the attached cover letter and the accompanying technical memorandum regarding the suggested Mid-coast LCP Amendment.

Thanks,

Clemens

Montara Water & Sanitary District

Serving the Communities of Montara and Moss Beach

P.O. Box 370131
8888 Cabrillo Highway
Montara, CA 94037-0131

Tel: (650) 728-3545
Fax: (650) 728-8556
E-mail: mwsd@coastside.net

Visit Our Web Site: http://www.mwsd.montara.com

July 6, 2026

Dan Carl
Coastal Commission North Central Coast District Director
Via email: NorthCentralCoast@coastal.ca.gov

Re: **San Mateo County's Proposed Midcoast Local Coastal Program Amendment**

Dear Mr. Carl:

The Montara Water and Sanitary District has recently become aware of a proposed amendment to the Local Coastal Program that would modify the existing Midcoast growth-management program. The District has prepared the attached technical memorandum addressing the impacts of the proposal for consideration by Coastal staff and ultimately the Coastal Commission.

Sincerely,

Clemens Heldmaier, General Manager

CC: Melissa Ashley, Coastal Planner
Isobel Cooper, Coastal Planner
Steve Monowitz, San Mateo County Director of Building and Planning
MidCoast Community Council
MWSD Board

Montara Water & Sanitary District
Serving the Communities of Montara and Moss Beach
P.O. Box 370131
8888 Cabrillo Highway
Montara, CA 94037-0131
Tel: (650) 728-3545
Fax: (650) 728-8556
E-mail: info@mwsd.net
Visit Our Web Site: http://www.mwsd.net

DATE: July 6, 2026

TO: Dan Carl, Coastal Commission North Central Coast District Director

FROM: Montara Water and Sanitary District

SUBJECT: **Technical Review of San Mateo County's Proposed Midcoast Local Coastal Program Amendment**

I. Executive Summary

Montara Water and Sanitary District {MWSD) supports the County's objective of facilitating affordable housing and recognizes the County's obligations under state housing law. The District does not oppose amendment of the Local Coastal Program {LCP) where supported by substantial evidence and consistent with the California Coastal Act. The District's concern is that the proposed amendment modifies one of the central implementation mechanisms of the certified Midcoast growth-management program without a corresponding reevaluation of the integrated infrastructure assumptions upon which the California Coastal Commission relied when certifying the current LCP.

Under the current LCP, the Coastal Commission did not evaluate the 40-unit growth limitation as a stand-alone accounting rule. Rather, it evaluated residential growth together with residential buildout, water demand, wastewater capacity, transportation, public works phasing, priority-use allocations, and public health and safety. The Commission concluded that growth limitations were necessary to address infrastructure constraints and further stated that growth limitations should be revisited after critical infrastructure needs and public service capacities were reevaluated.

The County proposes to replace the existing rolling three-year averaging methodology with a cumulative historical accounting methodology extending back to January 1, 2013.[1] While characterized as a minor administrative revision, the practical effect is to create a permanent bank of previously unrealized permits that never expires. District engineering analysis {discussed below) concludes that this approach could allow approximately 188 previously unrealized residential units to be constructed during a future year while remaining below the cumulative average. Based on MWSD's historical demand assumptions, such a scenario would increase average day water demand by more than 28,000 gallons per day, or approximately 10.4 percent above current average day demand, substantially exceeding the annual planning assumptions historically relied upon by the District.

As this memo describes, the District respectfully requests that the County address several planning questions before any modification to the certified growth-management methodology:

1. What planning principle supports relying upon permit activity dating back to 2013 to regulate infrastructure planning in 2026, 2030, or future decades?
2. At what point do unused residential permits become too remote in time to remain a reliable indicator of current infrastructure demand and public service capacity?
3. Has the County evaluated how replacing the existing rolling three-year methodology with a cumulative historical averaging methodology changes the effective annual growth rate, permit availability, and resulting demand on public infrastructure?
4. How does the amendment affect water demand, wastewater demand and priority-use allocations?
5. What are the fiscal and planning implications for utility providers?

The District believes these questions directly address the proposed amendment so that it complies with the Coastal Commission's regulations require that an LCP amendment include "a discussion of the amendment's relationship to and effect on the other sections of the certified LCP." {14 Cal. Code Regs. § 13552.) Without answers, the Board cannot determine whether the amendment merely changes an accounting methodology or fundamentally alters the growth-management framework previously certified by the California Coastal Commission.

[1] Since the initial preparation of this memorandum, the District understands that the County may revise its proposed permit accounting methodology in response to public comments. Regardless of the methodology ultimately adopted, the County must still analyze whether the infrastructure assumptions underlying the existing growth limit continue to support the proposed level of development.

The County's proposal staff report focuses primarily on administrative efficiency and the practical consequences of exhausting the 2025 permit allocation. While those are legitimate implementation concerns, they do not answer the separate planning question of whether replacing the certified three-year growth-management mechanism with a cumulative historical accounting system remains consistent with the integrated infrastructure planning framework upon which the current LCP was certified.

II. Background

The LCP's current growth management framework was developed through a comprehensive planning effort over more than a decade:

- **1999** - County initiates Midcoast LCP Update project.
- **1999-2009** - Extensive public workshops, technical studies, and Commission review.
- **December 2009** - Coastal Commission approves the Update subject to 72 modifications focused on tying growth to infrastructure capacity.
- **2010-2011** - County revises the amendment and resubmits it.
- **2012** – Coastal Commission certifies the revised LCP after incorporating the Commission's modifications, including the 40-unit annual growth limit, updated water and wastewater demand analyses, priority-use allocations, and public service requirements.
- **2026** - County proposes changing the permit accounting methodology without updating those related infrastructure assumptions.

At the time the California Coastal Commission certified the current Midcoast LCP in 2012 {https://documents.coastal.ca.gov/reports/2012/8/W15a-8-2012.pdf; https://documents.coastal.ca.gov/reports/2009/12/th18a-12-2009.pdf), it evaluated an integrated planning framework consisting of:

- residential buildout;
- water supply and demand;
- wastewater treatment and transmission;
- transportation capacity;
- public works phasing;
- priority water allocations; and
- growth management.

As the Coastal Commission explained:

> "The proposed Update ... assures consistency with Coastal Act requirements that new development is concentrated in urban areas with **adequate public services, including water supply, wastewater disposal, and transportation capacity** "
>
> **"Coastal Act section 30250 directs new growth and development to existing urban areas with adequate public services, including water supply, wastewater disposal, roadway capacity and other infrastructure**, so that growth does not adversely affect coastal resources."

The Commission concluded that significant public service issues, including water supply, wastewater capacity, transportation congestion, and cumulative development impacts, required an integrated planning response before modifying growth limitations.

The County's current proposal is intended to address affordable housing implementation but does not revisit those integrated assumptions. Without a current examination of these critical underlying growth assumptions, the proposed amendment fails to the consider the potential impacts to public services. The District respectfully submits that the current proposal changes that carefully balanced methodology without evaluating whether the infrastructure assumptions that justified the balance remain valid.

III. The Proposed Amendment Fundamentally Changes the Certified Growth-Management Mechanism

The County's proposed LCP Amendment fundamentally changes the operation of the certified growth management program. Under the current certified LCP, affordable housing projects that exceed the annual 40-unit growth limitation may proceed only if the average number of permits issued over the current year and the following two years does not exceed 40 units per year.

This approach temporarily smooths unusually large affordable housing projects while maintaining the overall annual growth limitation adopted by the California Coastal Commission. *The methodology functions as a short-term planning tool that remains directly tied to current development activity and near-term infrastructure planning.*

The Coastal Commission specifically recommended this three-year averaging approach as a means of accommodating affordable housing projects while preserving the overall 40-unit annual growth limitation adopted to address infrastructure constraints.

Further, the proposed amendment creates a different accounting methodology by calculating compliance using the annual average number of permits issued from January 1, 2013 through the year in which permits are issued. Although this appears at first glance to be merely a longer averaging period, the practical effect is substantially different.

Rather than temporarily smoothing development over a limited planning horizon, the proposed methodology effectively creates a permanent bank of unused residential permits accumulated since 2013. Because each year in which fewer than 40 permits were issued remains permanently incorporated into the calculation, unused permit capacity never expires and continues to influence permit availability indefinitely.

As the historical averaging period grows longer, the denominator also increases each year. Consequently, the County may continue issuing permits well above the historical annual average while remaining below the cumulative average established by the proposed amendment.

Accordingly, the proposed amendment *no longer functions as a limited-term averaging mechanism*. Instead, it establishes a cumulative historical accounting system based upon permit activity extending back more than a decade.

As stated above, the certified LCP established a growth management mechanism designed to regulate the pace of development in relation to available public services and infrastructure. The proposed amendment appears to replace that mechanism with a different planning tool that allows historical unused permit capacity to be carried forward indefinitely, which is more than a mathematical adjustment because it changes how residential growth is measured, how permit availability is determined, and potentially how future development is distributed over time.

The County staff report does not evaluate whether this different accounting methodology affects the infrastructure assumptions that formed the basis for certification of the current LCP. Indeed, the Commission evaluated residential growth together with public service capacities. The Commission concluded that these planning elements collectively formed the basis for limiting residential growth until critical infrastructure deficiencies were addressed. The Commission further stated:

> "Once these critical infrastructure needs are addressed, the County will be in a position to reevaluate whether public service capacities are adequate and thus whether growth limitations should be adjusted."

Based on the foregoing, the District respectfully submits that changing the methodology by which the growth limitation operates should similarly be accompanied by an evaluation of whether the supporting infrastructure assumptions remain valid. Before modifying that certified framework, the same integrated analysis should accompany the County's current proposal.

IV. The Coastal Commission Required an Integrated Infrastructure Analysis

MWSD respectfully requests that the County evaluate whether the underlying infrastructure assumptions remain valid in light of more than a decade of actual development. Thus, the question is whether changing the methodology used to administer the growth cap alters the assumptions regarding:

- water demand;
- wastewater generation;
- public works phasing;
- infrastructure capacity;
- priority-use reservations; and
- future capital improvements.

The Coastal Commission specifically treated these subjects as interdependent when certifying the current LCP. Indeed, Commission staff stated that the proposal before it included

> "an update of the estimated Midcoast residential buildout," "an update of the estimated Midcoast water and sewer demand," "reallocation and reservation of increased water supply," and "a reduction in the residential growth rate limit ... to address infrastructure constraints."

The current amendment proposes to modify only one of those interrelated planning elements. The District respectfully submits that the additional analysis is warranted because the Coastal Commission originally conditioned the residential growth limitation upon the relationship between growth and available public services.

V. District Engineering Analysis

LCP Policy 1.23 established the annual residential growth limitation as one element of an integrated public infrastructure strategy. As recognized in the County's staff report, the annual growth limit was intended to remain in place until: {1) a comprehensive transportation management plan was incorporated into the LCP; {2) facilities were constructed to adequately manage stormwater and eliminate wastewater overflows; and {3) the growth rate was modified

through an LCP amendment. While progress has been made on portions of this framework, the County has not demonstrated that the integrated infrastructure assumptions supporting the certified LCP have been comprehensively reevaluated before changing the growth-management methodology.

Moreover, District engineering analysis demonstrates that the proposed amendment is not merely an accounting revision. Using the County's own permit data, approximately 188 previously unrealized residential permits could remain available under the proposed cumulative methodology. Because those unused permits never expire, the proposal allows a potential future spike in annual development while remaining below the cumulative average dating back to 2013. This represents a materially different growth-management mechanism than the existing rolling three-year methodology.

From an infrastructure planning perspective, the distinction is significant. Based upon MWSD's historical average residential demand of approximately 48 gallons per capita per day and an average household occupancy of approximately 3.14 persons per dwelling, implementation of approximately 188 additional units within a single year would increase average day demand by more than 28,000 gallons per day, resulting in an approximately a 10.4 percent increase over the District's current average day demand. This level of growth substantially exceeds the historical planning assumptions used in the District's water supply planning, capital improvement programming, infrastructure sizing, reserve planning, and long-term financial planning.

The District has historically relied upon the certified LCP's annual growth limitation and associated planning assumptions when preparing master plans, capital improvement programs, capacity analyses, grant applications, and infrastructure replacement schedules. Replacing the certified methodology after more than a decade of reliance changes the planning baseline upon which those decisions have been made. Before implementing a fundamentally different accounting methodology, the County should evaluate the implications for infrastructure planning and public utility providers that have reasonably relied upon the certified LCP.

Recent residential growth has also been concentrated within MWSD's service area. Consequently, the proposed amendment may disproportionately increase demands on MWSD's water and wastewater infrastructure, accelerate capital improvements, and shift additional financial burdens to existing and future MWSD ratepayers. The issue is not whether development should occur within one service area or another; rather, it is whether the County has evaluated whether actual development patterns remain consistent with the water demand, wastewater, and infrastructure assumptions underlying the certified LCP.

These engineering findings reinforce the District's legal concern that the proposed amendment changes the operation of one of the principal implementation mechanisms of the certified LCP

without a corresponding evaluation of the integrated infrastructure framework upon which the California Coastal Commission relied when certifying the Midcoast growth-management program.

Consequently, changing the methodology for measuring residential growth should also include an evaluation of whether these supporting infrastructure assumptions remain accurate today. The relevant question is whether changing the averaging methodology affects the infrastructure assumptions upon which the certified LCP relies.

VI. Procedural and Planning Considerations

Planning staff states that modifying the averaging methodology is the quickest method of addressing the current permitting problem and will improve administrative efficiency and reduce permitting uncertainty. Planning staff concludes that changing the averaging methodology is needed to avoid administrative challenges, facilitate future affordable housing and compliance challenges.

However, characterizing the proposal extends beyond a simple administrative revision because it changes the implementation mechanism of the certified LCP.

The Coastal Commission's regulations governing amendments to an LCP requires discussion of an amendment's relationship to and effect on the remainder of the certified LCP. {14 CCR section 13552) The County's staff report does not evaluate updated water demand, wastewater demand, public works, fire flow, emergency supply, priority-use allocations or infrastructure phasing. As stated above, these omissions mirror concerns identified by the Coastal Commission in 2009. Commission staff specifically stated:

> "Once these critical infrastructure needs are addressed, the County will be in a position to reevaluate whether public service capacities are adequate and thus whether growth limitations should be adjusted."

Accordingly, administrative efficiency and infrastructure planning should be considered together rather than separately.

Moreover, the District recognizes that the County's adopted Housing Element may require the County to pursue future amendments to the certified Local Coastal Program in order to accommodate additional housing opportunities. However, those obligations do not alter the Coastal Commission's independent responsibility to determine whether any proposed LCP amendment is consistent with the Coastal Act. Indeed, the Housing Element expressly provides:

". The Housing Element does not alter any policies or regulations relating to the County's coastal zone, and has been reviewed and determined to be consistent with the LCP and all implementing regulations."

As such, the Housing Element does not diminish the need for updated analyses of water supply, wastewater capacity, transportation, fire protection, public infrastructure, and priority-use allocations where the proposed amendment would materially affect the certified growth-management framework. To the contrary, if the County anticipates future increases in the allowable rate of residential development, that prospect further supports preparing a comprehensive amendment evaluating the infrastructure assumptions underlying the certified LCP rather than adopting piecemeal amendments that address individual implementation issues in isolation.

Finally, the Coastal Commission recognized during it previous certification of the LCP that residential growth cannot be evaluated solely by reference to permit availability. Rather, the Commission emphasized that development potential throughout the Midcoast is affected by environmental constraints, including geologic hazards, environmentally sensitive areas, and other physical conditions that influence the location, density, and feasibility of development.

The Commission further observed that County regulations limiting development within environmentally constrained areas are necessary to protect public safety and comply with state and federal environmental requirements. These considerations formed part of the planning framework supporting certification of the current LCP and those principles remain equally applicable today.

Since certification of the current LCP, San Mateo County has completed an updated geotechnical evaluation of the Seal Cove area. The report documents continuing, and in certain locations accelerating, ground movement affecting both public infrastructure and private property. It also revises prior geologic hazard mapping and identifies conditions that present increasing challenges for public infrastructure, private utilities, roadways, and private development within portions of the Midcoast. The District's response to these documented conditions has been guided by its statutory obligation to provide safe and reliable water and wastewater service while protecting public health, public resources, and critical public infrastructure. The District offers this information to illustrate that the environmental constraints identified by the Coastal Commission continue to evolve and directly affect infrastructure planning.

Accordingly, before modifying the certified residential growth-management methodology, the County should evaluate whether updated information regarding geologic hazards and other

environmental constraints warrants corresponding revisions to the infrastructure planning assumptions that underlie the certified Local Coastal Program.

VII. Conclusion

The County staff report characterizes the proposed amendment as a relatively limited modification to the methodology used to average residential building permits. However, the practical effect of the amendment appears to be substantially broader.

Rather than merely extending the averaging period, the proposal would replace the certified rolling three-year averaging methodology with a cumulative historical accounting system based upon permit activity dating back to January 1, 2013. As a result, unused permit capacity accumulated over more than a decade would continue to influence permit availability indefinitely, fundamentally changing the manner in which the Midcoast residential growth management program operates. This is not simply a mathematical adjustment; it changes the accounting methodology used to administer one of the principal implementation mechanisms of the certified Local Coastal Program.

MWSD respectfully requests that the Board defer action on the proposed amendment until the County completes an integrated evaluation of the infrastructure assumptions that support the certified Midcoast Local Coastal Program.

The District believes such analysis will provide the County, the Coastal Commission, and the public with a more complete record upon which to evaluate whether the proposed amendment maintains the internal consistency of the LCP while accommodating the County's housing objectives.

DRAFT

Outlook

FW: Public Comment on November 2026 Agenda Item Wednesday 10b - San Mateo County Amendment No. LCP-2-SMC-26-0048-1 (Midcoast Residential Cap).

From: Silke.Aumann@web.de <Silke.Aumann@web.de>
Sent: Sunday, October 18, 2026 4:19 AM
To: NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>; silke.f.aumann@gmail.com; mail@mcknhm.com
Subject: Public Comment on November 2026 Agenda Item Wednesday 10b - San Mateo County Amendment No. LCP-2-SMC-26-0048-1 (Midcoast Residential Cap).

You don't often get email from silke.aumann@web.de. Learn why this is important

Dear Chair and Members of the California Coastal Commission,

I am writing to express my strong support for amending San Mateo County's Urban Midcoast residential development cap to allow responsible residential construction to continue. I urge the Commission to approve a workable amendment that prevents prolonged interruptions in housing development while maintaining appropriate coastal and environmental protections.

California is facing a serious housing shortage. Housing affordability is a major challenge for families, young professionals, essential workers, and longtime residents. Communities along the San Mateo County coast are no exception. Restricting the construction of new homes for years at a time makes an already difficult situation worse.

The current Midcoast permit allocation system illustrates an unintended consequence of growth restrictions. Following the issuance of 102 residential building permits in 2025, the county has been unable to accept additional building permit applications for new residential units, with restrictions potentially continuing until 2028 unless the Local Coastal Program is amended.

1. Small property owners should not bear a disproportionate burden.

Many owners of undeveloped residential lots are ordinary individuals and families, not large developers. They may have purchased land years ago with the reasonable expectation that they could eventually build a home, subject to applicable regulations.

These owners already face substantial costs for land acquisition, property taxes, engineering, architectural design, environmental assessments, and permitting. An extended restriction on new building permits creates additional financial uncertainty and can make properties difficult to sell.

It is particularly concerning when the allocation of permits to larger developments effectively prevents individual lot owners from moving forward with a single home. Supporting affordable housing is essential, but it

should not unintentionally eliminate development opportunities for other property owners.

2. Coastal protection and responsible residential development should coexist.

Protecting the California coast is critically important. However, environmental protection should not require an extended suspension of otherwise permissible residential development.

Individual projects must still comply with zoning requirements, coastal protections, environmental regulations, drainage standards, building codes, and other applicable safeguards.

A more balanced approach would allow appropriately designed residential projects to proceed through established review processes while continuing to protect coastal resources.

3. Fairness, transparency, and predictability are essential.

Property owners need a reasonable degree of certainty about whether and when they can develop their land.

A permitting system in which the availability of future building permits can change dramatically because of approvals granted to unrelated projects creates substantial uncertainty. It is especially difficult for owners who have already invested considerable time and money in planning and permitting.

Any residential growth management system should provide transparent allocation rules, reasonable timelines, and fair opportunities for smaller projects.

The Commission should also consider whether the current approach unintentionally favors larger developments or applicants who are better positioned to navigate prolonged permitting processes.

4. A lasting solution is preferable to repeated permitting interruptions.

I welcome San Mateo County's proposal to revise the calculation methodology for its residential development cap. However, I encourage the Commission to consider whether the amendment provides sufficient long-term predictability and whether additional changes may ultimately be necessary.

A sustainable policy should support affordable housing, accommodate reasonable small-scale residential development, protect coastal resources, and avoid recurring periods during which otherwise eligible projects cannot obtain building permits.

In conclusion, I respectfully urge the California Coastal Commission to approve an amendment that restores a workable and predictable pathway for residential development in the Urban Midcoast.

The need for affordable housing and the legitimate expectations of individual property owners should not be treated as competing interests. Both deserve consideration within a fair and balanced planning framework.

California's coastal communities need housing policies that protect the environment while allowing communities to remain accessible, economically viable, and welcoming to families and future generations.

Thank you for your consideration and for the Commission's work on this important issue.

Sincerely,

Silke Aumann

Outlook

Re: Concerns Regarding Delays and Lack of Building Permit Approvals on the San Mateo County coastside

From: Travis, Galen@Coastal <Galen.Travis@coastal.ca.gov>
Sent: Tuesday, May 19, 2026 3:20 PM
To: Ashley, Melissa@Coastal <melissa.ashley@coastal.ca.gov>
Subject: FW: Concerns Regarding Delays and Lack of Building Permit Approvals on the San Mateo County coastside

From: Tony Canadas <info@tonycanadas.com>
Sent: Thursday, May 14, 2026 8:26 PM
To: NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>
Subject: Concerns Regarding Delays and Lack of Building Permit Approvals on the San Mateo County coastside

You don't often get email from info@tonycanadas.com. Learn why this is important

Dear Commissioners,

My name is Tony, and I'm a 4th generation Half Moon Bay coastsider. I have lived my entire life on this beautiful coast as did my father, grandfather and great grandfather. I was recently in contact with the San Mateo County Planning Department and they asked that I reach out to you about building permits.

I am writing to express concern regarding the ongoing lack of building permit approvals and the significant delays affecting property owners, contractors, and local communities within the Midcoast of San Mateo County's coastal zone.

My wife and I have 3 adjoining lots in El Granada and have designed one 3500 sq foot home on the entire 3 lot 17,000 sq.ft. parcel. We have been saving for over 30 years and are baffled that we cannot obtain a building permit from the county. While I have always understood and appreciate the important role the California Coastal Commission plays in protecting our beautiful coastline and environmental resources, the current permitting process has become a juggernaut, and totally unpredictable for applicants.

The San Mateo County Planning Department said that 70 permits were issued for a single project, within a 3-building footprint and now there are no permits available until 2028 or longer?This project fit into our coastside community about as well as a dozen eggs fit into a shot glass. This project was a shame and not supported or representative of the small coastal town of Moss Beach, which will forever be changed.

Now this project has caused a massive delay and is creating serious financial and practical burdens on homeowners, small businesses, and local housing development efforts.

All local projects involving renovations, accessory dwelling units (ADUs), infrastructure improvements, and modest residential development are facing extended timelines with little clarity regarding approval. Applicants invest substantial resources into engineering, environmental studies, and compliance efforts as we have, only to encounter repeated procedural delays and shifting timelines. I'm sure you are well aware that the Midcoast towns of El Granada Miramar, and Half Moon Bay, already have a very low growth rate because of the limited amount of Water Connections that were offered and sold in the 90's. Even with the ADU push in California this area is still slow coast growth because of the limited number of permits available.

I respectfully urge the Commission to consider issuing additional permits to improve efficiency and predictability within the permitting process. It will maintain a balanced approach that protects coastal resources while also allowing responsible development and property maintenance to move forward without excessive delay.

Thanks for your time,
Tony Canadas

Tony Canadas
[redacted]
info@tonycanadas.com
https://tonycanadas.com/
http://forceofnaturecollection.com/