



COMMITTEE FOR
GREEN FOOTHILLS



SIERRA
CLUB
LOMA PRIETA

April 23, 2018

Jill Ekas, Community Development Director
City of Half Moon Bay
501 Main Street
Half Moon Bay, CA 94019

Re: PDP-16-084: CGF Comments on the Preliminary Application for the Surf Beach/Dunes Beach Hotel, RV Park and Campground

Dear Jill:

On behalf of Committee for Green Foothills (CGF) and Sierra Club Loma Prieta Chapter (SCLP), we write to provide early input regarding the above-referenced Preliminary Application.

The proposed project includes: (1) a **200-unit Hotel/Lodge/Conference Center** with spa/fitness center, a “country style” general store, and a five-acre site that would be reserved as a “working farm”, all located on 26 acres south of Young Avenue, and (2) a **170 site RV Park and Campground**, a 5,000 square foot clubhouse with bathrooms, laundry facilities, a swimming pool and a small sundry store, located on 21 acres north of Young Avenue. Access to the project area would be from Young Avenue, a primary coastal beach access.

CGF and SCLP do not believe the Preliminary Application, as submitted, is in conformity with the certified Half Moon Bay Local Coastal Program policies relating to the area’s designation as Planned Development (PD), as further detailed below.

The Surf Beach/Dunes Beach Planned Development Area (per Land Use Plan (LUP) Policy 9.3.3) is described as “a partially undeveloped area totaling about 50 acres, bisected by Young avenue and bounded by Half Moon Bay State Beach on the west and south, Highway 1 on the east, and the partially developed City of Naples subdivision on the north”. A key 2.1- acre area that was subdivided into four parcels in 2012 along the northern boundary of the Planned Development Area is not included within the proposed Project Area but nonetheless must be included in the Specific Plan, as well as three other existing residences on developed parcels within the Planned Development Area. Additionally, the proposed Project Area includes 17 parcels owned by the Coastside Land Trust (C.L.T.) which are likely intended to be conserved as Open Space, 9 Private Parcels owned by other private entities (P.P.) and one parcel owned by the City of Half Moon Bay. CGF and SCLP believe that the owners of these

parcels must be included in the planning process, and most importantly, must be in agreement with the Specific Plan due to the potential for adverse impacts to their property.

Planned Development Designation: The intent of the PD designation is to ensure that large, undeveloped areas within the City are planned in a comprehensive way that protects resource values, ensures coastal access, eliminates poorly platted and unimproved subdivisions, and clusters new development to provide open space and recreation (LUP Policy 9.3.2). The entire site shall be planned as a unit, and flexible design concepts, including clustering and mixture of dwelling types shall be required to accomplish all of the following goals: protection of the scenic qualities of the site, protection of coastal resources, i.e. habitat areas (including sensitive habitat areas (ESHA), archaeological sites, and prime agricultural lands. Development must also avoid siting of structures in hazardous areas, and provide adequately for public open space, recreation, and/or beach access (LUP Policies 9-8 and 9.9).

Protection of Coastal Resources: The proposed project area is almost entirely comprised of prime agricultural soils (per San Mateo County Soil Survey Maps). Protection of prime agricultural land is a priority under the Coastal Act (Section 30241) The current use of the land north of Young Avenue is open field agriculture (with primarily dry crops such as hay and irrigated row crops in some years) and equestrian/visitor serving uses and open space south of Young Avenue. Historically, there were significant wetland areas on part of the proposed project area. However, these wetlands have been altered or destroyed through removal of soils, as well as by farming and equestrian operations. Protection of environmentally sensitive habitat areas (ESHA) against any disruption of habitat values is a high priority under the Coastal Act (Section 30240). There is significant potential for restoration of these altered and/or destroyed wetland areas.

Protection of Scenic Qualities: The Surf Beach/Dunes Beach area is the ONLY area within the City of Half Moon Bay other than Surfer's Beach where there are scenic views of the shoreline dunes and ocean from Highway One. Protection of these scenic views is a priority under the Coastal Act (Section 30251) and the City's LCP. As proposed, this project would virtually eliminate most, if not all, of these scenic views. Maintaining and expanding the existing equestrian/visitor serving and open field agricultural/open space uses at Surf Beach/Dunes Beach would best preserve these significant and irreplaceable views.

Avoidance of Hazards: A significant portion of the project site (primarily north of Young Avenue) is located within the mapped tsunami hazard zone, within the 100-year flood zone, and is also subject to Sea Level Rise. Coastal Act Section 30253 requires that new development minimize risks to life and property in high geologic, flood and fire hazard areas. In order to avoid the need for future armoring of the shoreline, no new development should be located within the mapped hazard zones. We recommend that the City designate the upland areas (outside of the mapped hazards zones) as a Managed Retreat Zone that would function as a relocation reserve for the State Parks facilities and Coastal Trail alignment as well as for existing structures that will need to be moved out of harm's way in the future.

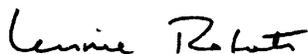
Visitor Serving Lodging Facilities are not needed: The Surf Beach-Dunes Beach Alternatives evaluation (LUP Policy 9.3.3) states that large scale visitor serving facilities are not needed, given provision for such facilities in other areas of the City, and could result in added congestion on Young Avenue, which is a primary access to the beach. Since certification of the LCP in 1993, several additional visitor serving facilities, including hotels and RV parks, have been built, and more are proposed (see Attachment A). There is an abundance of hotels, small inns, and RV facilities in Half Moon Bay and the unincorporated Mid-Coast, not to mention the burgeoning Vacation- Rental-by-Owner use of single family residences. CGF and SCLP believe the city does not need additional large scale visitor serving facilities, given the plethora that exist today.

Retain Visitor Serving Equestrian Uses and Expand Agricultural Uses: The Surf Beach-Dunes Beach Alternatives evaluation further states that the existing horse stables and riding area should be retained. CGF and SCLP strongly support retention and expansion of the equestrian uses, along with continuation and expansion of the existing agricultural activities within this Planned Development Area. A farm stand at the intersection of Young Avenue and Highway One for direct sales of local produce to beach visitors could be a great amenity in support of expanded on-site farming. CGF and SCLP note that there is significant potential for agricultural wells to be developed near Frenchman's Creek on this property that could support irrigated field crops.

Traffic Impacts from Proposed Project would interfere with Coastal Access: The development of the proposed 370 units of Hotel/RV Park and associated facilities at Surf Beach/Dunes Beach would interfere with Coastal Access requirements of the Coastal Act (Section 30001.5) and the Half Moon Bay LCP because it would: (1) interfere with vehicle access along Young Avenue to the Dunes Beach State Park, (2) require physical changes to Highway One at the intersection with Young Avenue – prospectively a traffic signal inclusive of significant widening – that would be inconsistent with the City's Circulation Element as well as its long range planning as coordinated with the San Mateo County Transportation Authority, and (3) negatively impact the intersections at Roosevelt Avenue and Ruisseau Francais, which intersections are currently operationally deficient during weekday peak commute times and are major congestion creators during mild, sunny weather weekends year-round.

Thank you for the opportunity to comment. CGF and SCLP look forward to working with the City of Half Moon Bay regarding the future of this important area of open space.

Sincerely,



Lennie Roberts, Legislative Advocate, Committee for Green Foothills, 339 La Cuesta, Portola Valley, CA 94028

A handwritten signature in black ink that reads "Ken King". The signature is written in a cursive, slightly slanted style.

Ken King, Chair, Coastal Issues Committee, Loma Prieta Chapter, Sierra Club 3921 East Bayshore Road, Palo Alto, CA 94303

cc: Mayor Deborah Penrose and Members of the City Council
Stephanie Rexing, California Coastal Commission
Other Interested Parties

Attachment: Half Moon Bay and Midcoast Visitor Facilities April 2018

Half Moon Bay and Midcoast Visitor Facilities, April, 2018

Half Moon Bay: Hotels, Motels, and Inns:

Ritz Carlton, **261** rooms
Half Moon Bay Lodge, **80** rooms
Coastside Inn at Half Moon Bay, **57** rooms
Beach House Hotel, **54** rooms
Comfort Inn, **52** rooms
Cameron's Inn Best Western, **46** rooms
America's Best Value Inn, **27** rooms
Zaballa House, **17** rooms
Half Moon Bay Inn, **15** rooms
San Benito House, **11** rooms
Nantucket Whale Inn, **7** rooms
Mill Rose Inn, **6** rooms

Half Moon Bay: RV Parks

Pillar Point Harbor RV Park, **48** sites
Half Moon Bay State Beach, **50** sites
Half Moon Bay (Cameron's) RV Park, **56** sites
Pelican Point RV Park, **75** sites

Half Moon Bay: Campgrounds:

Half Moon Bay State Beach, 52 camp sites
Sweetwood Group Campground, space for up to 50 people

Mid-Coast: Hotels, Motels, and Inns:

Oceano Hotel, Princeton, **95** rooms
Cypress Inn on Miramar Beach, Miramar, **18** rooms
Harbor View Inn, El Granada, **17** rooms
Seal Cove Inn, Moss Beach, **10** rooms
Ocean View Inn, Montara, **8** rooms
Inn at Mavericks, Princeton, **6** suites
Pacific Victorian B&B, Miramar, **4** rooms
Point Montara Lighthouse Hostel **6** rooms with **30** beds

Proposed Hotel in Half Moon Bay:

Hyatt Hotel, **147** rooms

Mid-Coast: Proposed RV Park

Harbor Village RV Park, Pillar Point Harbor, **50** spaces