



April 9, 2021

Chair Steve Padilla and Members of the
California Coastal Commission
455 Market Street, Suite 300
San Francisco, CA 94105

Re: Agenda Item Th9a. on the April 15, 2021 Agenda: City of Half Moon Bay LCP Amendment No. LCP-2-HMB-20-0081-2 (Land Use Plan Update)

Dear Chair Padilla and Commissioners,

On behalf of Green Foothills and Loma Prieta Sierra Club, we commend the City and Commission staffs for their close collaboration and generally strong Land Use Plan policies in the Half Moon Bay Land Use Plan (LUP) Update.

Our organizations have been involved in this planning process since it began in 2014. We do have some outstanding issues/concerns with the LUP as submitted, which we hope will be fully addressed through the Implementation Plan (IP). We wish to offer a serious concern that although the staff report correctly concludes that the LUP update increases riparian and ESHA buffer zones, it is probable, in our view, that the expanded ability to reduce buffer zones may well have a much larger and negative environmental impact, most significantly in the Planned Development (PD) areas and on antiquated subdivision lots in mostly developed neighborhoods. Perhaps during the IP process, Coastal staff will be able to clarify, to a better degree, just how "feasibility" and minimum entitlements will be determined.

We are particularly concerned that the developers of the Surf Beach/Dunes Beach Planned Development (PD) Area are pushing for new LUP policy language that would support their proposed 212-unit luxury hotel/conference center and 177-space upscale RV park on this iconic ocean-front area.

Their proposed development flies in the face of Coastal Act and long standing LUP policies. Specifically, the hotel/conference center/RV park ignores:

- (1) The importance of preserving prime (Class 1 and 2) agricultural soils, farming operations and equestrian uses within the Surf Beach/Dunes Beach PD Area - which are Coastal Act priority uses

- (2) The importance of preserving scenic and visual resources including views across the site to the ocean from Highway One as well as from the beach and coastal trail to the eastern hills
- (3) The existing unacceptable and unmitigable traffic conditions (LOS “F”) on Highway One between the northern city limits and Highway 92, including the segment adjacent to the Surf Beach/Dunes Beach PD Area. These conditions are projected to worsen over the Planning Horizon (2040) as well as at Buildout.
- (4) New information in the California Geological Survey **Tsunami Hazard Area Map** (March 23, 2021) which now includes the entire Surf Beach/Dunes Beach Area within the projected tsunami inundation area.

The most climate friendly, resilient planning for this PD area, consistent with the Coastal Act, is to continue and expand agricultural and equestrian uses. We continue to urge the developer to work with the Coastside Land Trust and other organizations and agencies to permanently protect this 48-acre area.

We support the LUP’s new policy direction that concentrates new development within the “Town Center” generally east of Highway 1 and south of Highway 92. This strategy will best avoid the deleterious impacts of new development on Highway One north of Highway 92, which already experiences unacceptable traffic Level of Service “F” in the AM peak hour, PM peak hour and on weekends. Concentrating development in the Town Center will also best achieve the goals of the City to protect prime agricultural lands, open space, and scenic and visual resources that are within several substantially undeveloped Planned Development (PD) areas west of Highway One.

We are concerned that the Staff Report (page 13), states that the City’s analysis of potential future uses and constraints for each PD area “is not prescriptive for what is going to be allowed through the LUP master planning process,” and “it may well be that different uses and intensities of use are approved...”. This appears to invite and encourage entirely different land uses than those that have been carefully evaluated through the LUP Update as well as the certified 1996 LUP.

We note that the 1996 LUP concluded that for Surf Beach/Dunes Beach, “large-scale visitor-serving facilities are not needed, given provision for such facilities in other areas”. This conclusion remains true today. LUP Update Policy 3-36, discourages any approval of new development north of Highway 92 that would contribute significant traffic to the weekend peak period where Highway 1 already experiences unacceptable Level of Service “F” – not only on weekends, but also on weekday peak morning and evening hours.

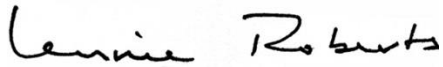
The City has also concluded that currently more accommodations, particularly high-end luxury hotel/spa/RV Park facilities such as proposed at Surf/Dunes Beach, are not needed. Half Moon Bay has ample visitor serving facilities; a proposed 129-room hotel (Hyatt) in south HMB is under currently under review by the City. With a 65% total rate of occupied

Room Nights in 2019, it is clear that Half Moon Bay does not need major new luxury visitor serving accommodations.

In 2019, in just six weeks, Green Foothills and local residents gathered 4860 signatures on a petition calling on the City to permanently protect the Surf Beach/Dunes Beach PD area. This petition was presented to the City Council in January 2020.

We urge your Commission to reject any proposed changes to the LUP that would accommodate the proposed development at Surf Beach/Dunes Beach PD.

Thank you for consideration of our comments.



Lennie Roberts Legislative Advocate
Green Foothills



Mike Ferreira, Executive Committee Member
Sierra Club, Loma Prieta Chapter

cc: Julia Koppman Norton, Coastal Planner
Jeannine Manna, North Central Coast District Manager
Jill Ekas, Community Development Director, Half Moon Bay