

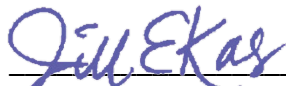


City of Half Moon Bay
Community Development Director Review
EMERGENCY COASTAL DEVELOPMENT PERMIT ISSUANCE
PDP-23-090– December 11, 2023

PERMIT ISSUANCE

This permit under consideration, PDP-23-090, is a joint application of the County of San Mateo and the City of Half Moon Bay for an Emergency Coastal Development Permit to develop a new neighborhood (preliminarily referred to as “Stone Pine Cove”) comprised of manufactured homes for low-income households located at 880 Stone Pine Road on the western side of the property used for the City of Half Moon Bay Corporation Yard. The neighborhood includes 46 manufactured homes for lower-income farmworker households, one manager's unit, and associated neighborhood infrastructure (e.g., access drives and utilities). Site amenities include public open spaces, two shared parking areas, and landscaping. The project includes the development of 28 units under the Joe Serna Farmworker Grant Program which will be made available to qualified (very low-income) farmworkers including the households displaced by the January 23, 2023 shooting incident. The City of Half Moon Bay is the property owner. An Emergency Coastal Development Permit for Stone Pine Cove is hereby approved subject to the Conditions of Approval contained in Attachment 1 for plans contained in Attachment 2.

PERMIT ISSUANCE



Jill Ekas, Community Development Director

December 11, 2023

Date

PROJECT SUMMARY

Owner:	City of Half Moon Bay
Applicant:	County of San Mateo and City of Half Moon Bay
City Contact:	John Doughty, Assistant City Manager (650) 726-8252
Requested Permits:	Emergency Coastal Development Permit for the Stone Pine Cove neighborhood emergency housing.

Site Location: 880 Stone Pine Road (Assessor's Parcel Number 056-260-180)

**Local Coastal Land Use Plan/
General Plan:** Public Facilities and Institutions

**Local Coastal
Implementation
Plan/Zoning:** Urban Reserve (U-R); note that the Certified Local Coastal Land Use Plan identifies this site for rezoning to the Public and Quasi-Public Land Use (P-S) Zoning District

**Environmental
Determination:** Statutorily Exempt pursuant to CEQA Statute Section 21080(b)(4) and Categorically Exempt pursuant to CEQA Guidelines Section 15269.

Note: An Initial Study/Mitigated Negative Declaration (IS/MND) was prepared for the City of Half Moon Bay Corporation Yard Improvement Project. Mitigation measures have been implemented per the Corporation Yard's IS/MND and its Mitigation Monitoring and Reporting Plan. A subsequent CEQA assessment will be conducted in conjunction with the follow-up Coastal Development Permit. It will incorporate previous work prepared for the Corporation Yard IS/MND as well as new studies as applicable.

Water: The project includes an extension of a water line to serve the project site and will be sized to provide adequate pressure. The new manufactured homes will be affordable to lower-income households and qualify for affordable housing water connections. Because agriculture is a Coastal Act priority land use, and because farmworker housing is considered to be an agricultural use, farmworker housing units are also eligible for Coastal Act priority water connections. The Coastside County Water District (CCWD) estimates that 30 water connections will be needed for the Stone Pine Cove residential units and additional connections will be needed for landscaping. The applicant will secure such connections directly from CCWD with the City authorizing 28 units from Coastal Act Priority allocation and remaining connections from Affordable Housing allocation.

Sewer:

An existing sewer main is located on the property, and no new sewer mains are required. A private collection system will be installed within the project site to direct effluent to the existing sewer main. There is adequate capacity in the collection system and treatment plant to serve the project. A maximum of 94 sewer capacity units and fees are required.

Dry Utilities:

Dry utilities include telecommunications/cable and electric power. Natural gas will not be provided to the site in accordance with the City of Half Moon Bay's commitment to carbon reduction. Dry utilities will be installed below grade.

Right of Appeal:

Emergency Coastal Development Permit: This permit allows property development necessary to address an emergency. As such the Emergency Coastal Development Permit is not appealable; however, per California Code of Regulations §13569 "Dispute Resolution for Local Permit Processing Procedures" parts C and D, an interested person may request the Coastal Commission executive director to review the local government permitting process and determinations.

Follow-Up Coastal Development Permit: A follow-up Coastal Development Permit will be required and submitted to the City within 60-days of issuance of the emergency permit. When that permit is considered, any aggrieved person may appeal future decisions of the Planning Commission or Community Development Director, as applicable. This project site is located within the Coastal Commission Appeals Jurisdiction; therefore, the City's final action on the follow-up Coastal Development Permit will be appealable to the California Coastal Commission.

BACKGROUND

Project Description: The project includes the development of a new neighborhood, tentatively named Stone Pine Cove. Stone Pine Cove will include 47 manufactured homes of varying sizes, access drives, infrastructure, and amenities including public open space. 46 units will be deed restricted affordable with 1 unit occupied by a resident manager. The proposed development would comprise approximately 5 acres at the western end of the City's Corporation Yard property at 880 Stone Pine Road.

Site & Surrounding Properties: The approximately 21-acre City-owned site is located within the City's defined Town Center at the terminus of Stone Pine Road. The property was used as a garden nursery prior to its current use as the City's Corporation Yard. The City's Corporation Yard utilizes approximately 4 acres on the east end of the site. Stone Pine Cove is to be located on an approximately 5-acre portion of the westerly portion of the property with the remainder of acreage devoted to habitat areas and respective buffers. The site abuts a fenced area containing a Conservation Easement and buffers to protect Pilarcitos Creek and its riparian habitat. Adjacent land uses are summarized below.

Surrounding Uses

	Use	Land Use Plan Designation / Zoning
North	Pedestrian path, Highway 92, and mostly undeveloped land across the highway	Mobile Home Park and the Carter Hill Planned Development (PD) / Industrial (IND) and Planned Unit Development (PUD)
South	Pilarcitos Creek and greenhouses beyond	Horticultural Business / Open Space Reserve (OS-R) and Agriculture (A-1)
East	Mixed light industrial, retail, and residential	Light Industrial / Industrial (IND)
West	Residential uses including Cypress Cove townhouses and the south side of the Hilltop Mobile Home Park	Residential Medium Density and Mobile Home Park / Planned Unit Development (PUD)

Improvements to the Half Moon Bay Corporation Yard have recently been completed ("Corporation Yard Improvement Project"). In advance of that project, the site was developed with the following:

- Corporation Yard offices in a converted ranch house
- Unpaved loop road from the terminus of Stone Pine Road to the Corporation Yard facilities
- Abandoned agricultural pond
- Trash and landscape materials enclosures
- Storage structures and yard space

The newly improved Corporation Yard includes the following additional and/or modified structures and uses:

- Storage and operations building (construction pending for a future phase of improvements)
- Two-way paved access road traversing the center of the site from west to east, starting at the terminus of Stone Pine Road to provide access to the Corporation Yard facilities at the eastern end of the property; replaces the northern portion of the unpaved access loop road
- Demolition and relocation of trash and landscape materials enclosures
- Solar field
- Corporation Yard parking lot
- Security fencing and gate
- Wildlife conservation corridor for protection of California red-legged frog and San Francisco garter snake which are special status species
- Riparian buffer and trail easement fencing

In total, the site area is comprised of the following:

<u>Use</u>	<u>Acreage</u>
Corporation Yard	4
Habitat Conservation	12
Stone Pine Cove Site	5
Total	21 acres

Note: Acreages are approximate.

A majority of the property is devoted to habitat conservation. A 100-foot-wide trail easement; environmentally sensitive areas (ESHAs) including Pilarcitos Creek and the abandoned agricultural pond; and required ESHA buffers cover approximately 12 acres of the property. Buffer requirements are 100 feet from delineated wetlands and 50 feet from the edge of Pilarcitos Creek's riparian vegetation or 100 feet from the top-of-bank, whichever is greater. The riparian buffer is generally within the wider trail easement; consequently, the effective riparian buffer is typically greater than the minimum required. Additionally, a designated wildlife conservation corridor supports protected status reptile and amphibian species. The corridor has been fully implemented with the recent installation of wildlife exclusionary fencing and via wildlife access tunnels under the new access road. Wildlife corridor fencing also extends westward along the edge of the trail easement. The corridor is designed to allow safe passage of protected status species, including the California red-legged frog (CRLF) and the San Francisco garter snake (SFGS), between the abandoned agricultural pond and Pilarcitos Creek and to keep protected status species away from the active portions of the property where they could potentially be harmed by vehicle traffic and other activities. Fencing also provides a barrier to the migration of these species onto Highway 92.

Granting of Emergency Permits: Municipal Code 18.20.040 C. presents the findings that must be made to grant an Emergency Coastal Development Permit. The code also provides the parameters under which the Community Development Director shall act on an Emergency Coastal Development Permit. Generally, the Director may act as quickly as deemed appropriate in the situation. The co-applicants (County of San Mateo and City of Half Moon Bay) addressed these requirements in the application's supplemental narrative contained in Attachment 3. The three required findings and the Community Development Director's determinations are presented below:

1. **Finding:** An emergency exists and requires action more quickly than permitted by the procedures for administrative permits or for ordinary permits, and the development can and will be completed within thirty days unless otherwise specified by the terms of the permit.

Director's Determination: Per Municipal Code Section 18.20.020.E, "Emergency" means a sudden unexpected occurrence demanding immediate action to prevent or mitigate loss or damage to life, health, property or essential public services.

This project is an emergency response. A mass shooting on January 23, 2023, at two Coastside farms, was a sudden and unexpected occurrence. This tragic event directly caused at least 19 lower-income farmworker households, comprising 40 individuals, to become homeless due to the "red-tagging" of substandard and unsafe housing, which included storage containers, recreational vehicles, and other non-habitable structures. These conditions precluded any ability for re-occupancy of this housing.

Following this tragedy, the County established an Emergency Farmworker Housing Safety Task Force. The Task Force has been inspecting housing on Coastside agricultural properties to ensure farmworker safety and safe living conditions. The process has been indicating that additional homes are needed immediately due to excessive overcrowding and substandard living conditions. As of November 2023, the task force has examined approximately 50% of the properties to be evaluated and has inspected 90 farmworker housing units occupied by 268 farmworkers. The task force determined that units housing 68 farmworkers do not meet minimum safety standards and require corrective actions.

San Mateo County anticipates that the task force will continue to identify substandard and unsafe housing units, creating an emergency need for additional affordable housing units. The County acknowledges that if the trend continues, as many as 130 farmworkers, in addition to the 19 households displaced by the shooting, will become homeless absent the immediate provision of new affordable housing units.

Homelessness and unsafe living conditions constitute a threat to life and health. Therefore, immediate action to prevent or mitigate loss or damage to life is essential to address this housing emergency. In the most immediate initial response, San Mateo

County and the City of Half Moon Bay, along with other non-governmental organizations (NGOs), secured temporary housing for this traumatized population; however, maintaining long-term funding of market-rate rental housing is not sustainable, and a permanent housing solution is needed quickly in consideration that these leases will expire in mid-2024. At present, these same families face the real possibility of homelessness once again. The City, NGOs, and philanthropic groups are working to secure funding to extend leases until the fall of 2024, the anticipated opening of the project.

This local housing emergency is set against the backdrop of a Statewide housing crisis and its Bay Area context. In the Bay Area, lower-income households are especially impacted because of the lack of units combined with a very high median income driving market-rate housing costs up to some of the highest levels in the United States.

For farmworkers on the San Mateo County Coastside, who typically earn near minimum wage with few, if any, benefits, market-rate housing is out of reach. Absent housing provided by particular farms, households double or triple up to share rent or they resort to living in substandard and often unsafe structures. In any of these cases, living conditions are often poor and overcrowded. These conditions discourage farmworkers and their families from working in this very high-income stretch of the Coastal Zone. Although the farming industry on the Coastside has been contracting in recent years primarily due to drought which has resulted in lower yields, the challenge of providing housing for and retaining farmworkers exacerbates the matter of maintaining coastal agriculture in this area. Coastal agriculture is a State priority as set forth in the California Coastal Act, and these lands are rich with prime soils as mapped by the State Natural Resource Conservation Service.

It is notable that this emergency – the need to find replacement housing for (a) the 19 lower-income farmworker households (40 individuals) who became homeless following the mass shooting in January 2023 as their temporary leases expire in mid-2024, and (b) any additional farmworkers and their families found to be living in unsafe conditions by the San Mateo County Emergency Farmworker Housing Safety Task Force – presents different timelines than more typical emergencies in the Coastal Zone which are often associated with weather-related or tidal impacts to structures, trees, or roadways. In those cases, the emergency is typically addressed within days or weeks of the event, with the follow-up Coastal Development Permit coming forward soon after. In this case, the City has some lead-time in advance of the next phase of the emergency response. However, that lead-time is still not sufficient to process a standard Coastal Development Permit and deliver critical affordable housing to 46 very low-income farmworker households. The project site is located within the Coastal Commission's appeals jurisdiction and thus an administrative Coastal Development Permit could not be processed. The standard process, including public hearing(s), would take several months

and be subject to lengthy appeals periods. Furthermore, San Mateo County, as the property developer, cannot go out to bid for the project construction until an entitlement is in place, thus the timing needed for completing a Coastal Development Permit through the standard process would delay the project by at least a year and likely longer.

The Emergency Coastal Development Permit provides a path for the County to proceed with public bidding and project construction to house the displaced farmworker households in permanent affordable units in a timely manner. Under normal processing, bidding of the project would not likely occur for at least 16 months, and occupancy of the first unit would be no earlier than 2026. The emergency permit affords the opportunity to see occupancy by displaced farmworkers in the fall or winter of 2024. Manufactured homes were selected as the most appropriate for this location and emergency housing need due to their fast build and low cost; the availability of grant funding for this housing type; and the context of the site, where a mobile home park is already adjacent to the property and low-rise structures are preferable because they maintain views from Highway 92 to the Pilarcitos Creek riparian corridor vegetation.

2. **Finding:** Public comment on the proposed emergency action has been reviewed if time allows.

Director's Determination: The public has been informed and input has been carefully considered.

Municipal Code 18.20.40.C specifies that in cases where public notice can be made, it shall be provided. In this case, the emergency action required upfront efforts to secure funding, which allowed time for significant public engagement. San Mateo County and the City of Half Moon Bay have co-hosted three outreach sessions as follows:

- April 17, 2023: Informational meeting with residents of the adjacent Cypress Cove Townhouse community with approximately 50 attendees.
- May 8, 2023: Facilitated community listening session with approximately 120 attendees. The San Mateo County District 3 Supervisor, Half Moon Bay Mayor, and Half Moon Bay Vice Mayor attended to listen to community input.
- August 17, 2023: Facilitated community meeting to present project plans, project timing, and permit process. Approximately 130 individuals attended.
- August 31, 2023: Follow-up meeting with residents of the adjacent Cypress Cove Townhouse community for a project update and a question and answer session with approximately 70 attendees.

Input from the first two sessions provided design guidance for this project. Draft plans and the traffic study were made available in advance of the third session to solicit specific feedback. Additionally, the third and fourth sessions were held in advance of approving this Emergency Coastal Development Permit, again to maximize opportunities for public input and disclosure. The City created and has maintained a special project update page on its website to update the community. The City has also continued to meet with community members and shared information via community enews.

Community input was far-ranging. Some Cypress Cove residents expressed concerns, especially about traffic, parking, and property values. Some residents expressed support for the project, some with reservations, while others stated their intent to support the new neighborhood residents as they move into the community. Farmworkers and housing advocates have indicated that the need is immediate, that the situation is dire, and that this condition goes far beyond the 19 displaced households from the January 23, 2023, shooting tragedy.

Public comment has been addressed in the following areas:

- Traffic study
- Parking needs assessment
- Biological resources protections
- Hazard avoidance and management
- On-site neighborhood management

All the above topics are described later in this permit documentation.

In advance of the issuance of this Emergency Coastal Development Permit, the project site was posted, emails were sent to individuals who had signed up for updates about this project, an update was provided at the December 5, 2023 City Council meeting, and all application materials were posted and made available to the public.

3. **Finding:** The work proposed would be consistent with the requirements of the coastal program.

Director's Determination: At its foundation, the Local Coastal Program's (LCP's) implementation of the California Coastal Act protects coastal resources including environmental resources, coastal access, coastal recreation, scenic and visual resources, and agriculture. The project's Town Center location is aligned with conformance to these protections. While the site allows for housing near services including schools, health care, and shopping areas, this location is in lieu of over-crowded and sometimes unsafe conditions on agricultural properties which often do not have access to potable water or permitted and/or sustainable sewer service. Such conditions can adversely impact coastal

resources, a condition that has been observed in coastal San Mateo County in numerous locations. Additional considerations relative to coastal resource projections include:

Environmental Resources: ESHA was protected and enhanced by improvements included in the Corporation Yard Improvement Project. The Stone Pine Cove neighborhood will not impact ESHA due to the measures taken to establish a wildlife conservation corridor and buffers in conjunction with the Corporation Yard project. Tree removals are required to accommodate the development. In summary, 12 trees proposed for removal qualify as “heritage” trees per Municipal Code Section 7.40.020 and consist of eight Monterey pines, three are Monterey cypress, and one shining willow which has a multi-trunk form and appears to be a large shrub. Monterey pine trees are shallow-rooted, susceptible to numerous pests and diseases, and have been in decline throughout the City for many years. The neighborhood was designed to avoid the most significant tree stands and plantings on the site, including mature Monterey cypress trees that form a hedge row along the site’s western property line. City regulations specify that Heritage trees that are removed must be replaced on a one-for-one basis with a minimum size 24-inch box specimen tree. The landscape plan includes significant replacement trees, resulting in a ratio of nearly 6:1 for each heritage tree removed. Some of the replacement trees will be Monterey cypress to fill in gaps in the hedgerow. Other trees proposed for removal do not qualify as heritage trees and replacement is not required; however, the landscape plan includes a significant number of new trees, as well as a range of landscaped spaces with shrubs and groundcovers compensating for the overall loss of vegetation. A tree removal plan summary was provided with the application and is included in Attachment 4.

Coastal Access and Recreation: Coastal access and recreation are maintained by this project. The project will not impede the development of a future trail along the north side of Pilarcitos Creek, for which a conservation and trail easement is already in place. The design and location of on-site amenities include provision for future access to the trail.

Scenic and Visual Resources: With frontage on Highway 92, the proposed development is adjacent to the Town Boulevard Scenic Corridor. Bordering Pilarcitos Creek and its riparian vegetation, it is also adjacent to a significant plant community. The Town Boulevard and significant plant communities are both visual resource areas per the Local Coastal Land Use Plan. Site planning and development form result in compliance with visual resource requirements. With respect to site planning, the new neighborhood will be located at a grade significantly lower than Highway 92. The location is screened from view by the elevated grade of the abandoned agricultural pond and existing hedge row of Monterey cypress trees. The development includes one-story manufactured homes that will be less visible than the structures approved and associated with the Corporation Yard for which no visual impact was identified. Homes are located further away from Highway 92 and on a lower portion of the property than the Corporation Yard structures. Views

from Highway 92 of Pilarcitos Creek riparian vegetation will be maintained. Renderings of the proposed neighborhood are provided in Attachment 5, and story poles will be installed per standard procedure as part of the follow-up Coastal Development Permit review process to confirm this opinion.

Coastal Agriculture: The Stone Pine Cove neighborhood will provide safe and deed-restricted affordable housing to individuals and families that work on San Mateo County coastside farms which directly supports the preservation of coastal agriculture.

In addition to coastal resource protection, the project is also consistent with additional land use/development, growth management, and hazard avoidance Land Use Plan policies.

Land Use/Development: The project site is in the Public Facilities and Institutions land use designation. The Land Use Plan directs future rezoning of the site to Public and Quasi-Public Land Use (P-S). Land Use Plan Policy 1-2, Coastal Resource Protection Priorities, determines that in advance of updates to the Zoning Ordinance in conformance with the recent Land Use Plan update, the Land Use Plan shall provide the standard of review, which includes the land use designations if they are insistent with the underlying zoning. The policy states:

Policy 1-2. Coastal Resource Protection Priorities. *Protection of ESHA, public access and other coastal resources are a high priority for the City. To the extent that any policies in this Land Use Plan (which serves as the City's General Plan Land Use Element) and other elements of the City's General Plan are ambiguous, the City shall interpret them in the way that best protects ESHA and other coastal resources and maximizes public access. In advance of updating the Implementation Plan for conformance with the policies of the 2020 Land Use Plan, the policies of the Land Use Plan shall provide the standard of review for any proposed new development, including where these policies are more protective of ESHA and other coastal resources and maximize public access as consistent with the Coastal Act. (Emphasis added.)*

Furthermore, the P-S zoning district allows emergency shelters as a permitted use. This project is aligned with that use.

Additional Land Use Plan policies in support of housing at this location and in support of farmworkers and affordable housing include:

Policy 2-5. Housing Element Conformance. *To ensure conformance with Coastal Act policies and priorities, focus the Housing Element's inventory of adequate sites*

within Town Center and through the Workforce Housing Overlay land use designation.

Policy 2-6. Housing Diversity and Affordability. *Encourage a diversity of housing types, including housing at a range of affordability levels, densities, sizes, and ownership types with equitable access to environmental benefits. Meet the needs of Half Moon Bay's diverse population, including young families, multi-generational families, students, young professionals, and seniors.*

Policy 2-8. Community Needs. *Support the development of land uses desired by the community and which contribute to quality of life. **Uses include affordable and diverse housing types such as farmworker housing** and smaller homes; light industrial uses including live-work and artisan uses; adaptive reuse of heritage buildings; agriculture and Half Moon Bay - Local Coastal Land Use Plan Chapter 2: Development 2-20 agriculture-compatible uses along with supportive accessory uses; commercial including neighborhood and local-serving uses; quasi-public uses including childcare, healthcare, animal care, and assisted living; and public uses including parks and other community facilities. (Emphasis added.)*

Policy 2-30. Town Center Planning. *Prepare and adopt an updated plan or zoning regulations and associated programs for the Town Center that includes use requirements, design standards, and circulation and parking management strategies. Specifically, Town Center planning shall include:*

- a. Uses. Provisions to encourage a diverse mix of uses, including a range of housing types and affordability levels and non-residential uses that support the needs of the local community and visitors;*

.....

Policy 2-3. Priority Land Uses. *Define priority land uses and support development of such land uses throughout the City by the following categories:*

- a. Coastal Act Priority Uses: Coastal-dependent uses, **agricultural uses**, visitor-serving commercial uses, and coastal access and recreational facilities. Coastal Act Priority Uses are considered top tier priority in this LCP; and furthermore, as consistent with Coastal Act Section 30222, coastal-dependent industry and agriculture take precedence over all other uses including visitor-serving commercial recreation facilities.*
- b. Local Priority Uses: **Affordable dwelling units** for extremely low, very low, and low-income households. Local Priority Uses are considered second tier priority behind Coastal Act Priority Uses in this LCP. (Emphasis added.)*

Policy 4-4. Farmworker Housing. *Farmworker housing is considered a Coastal Act Priority Use, as well as a Local Priority Use. Encourage a range of farmworker housing including non-permanent housing for seasonal farmworkers and permanent housing through the Workforce Housing Overlay at appropriate affordability levels, densities, and locations on agricultural lands in Rural Coastal and Horticultural Business land use designations. Encourage clustering of farmworker housing where feasible, especially to preserve prime agricultural soils such that it has the least impact on agricultural production. For agricultural and agricultural compatible uses in Planned Developments, allow for limited on-site affordable employee housing as provided for in the Planned Development designation in Chapter 2. Development. (Emphasis added.)*

Growth Management: The project is subject to the City's growth management allocation system, generally referred to as "Measure D." Measure D requires that one growth allocation per unit be secured prior to the issuance of a Coastal Development Permit. Allocations are limited each year to a number that would result in 1% population growth citywide with a 0.5% bonus allowed within a defined downtown area (the City's former Redevelopment Area). 880 Stone Pine is located within the defined downtown area and 28 Measure D allocations for the downtown area were not yet allocated as of May 23, 2023, the date when the State of California Joe Serna Jr. Grant was awarded to San Mateo County for 28 manufactured housing units for farmworkers. Following the second community meeting during which the concept plans were presented, the City processed an application and awarded 28 allocations on August 18, 2023.¹ No pending applications for allocations had been submitted at that time, and no applicants were denied allocations within the downtown area in 2023 as of the date of this application for an Emergency Coastal Development Permit. An application for the remaining 19 required allocations will be processed in conjunction with the follow-up Coastal Development Permit.

Archeological Resources: A Phase 1 study was conducted in conjunction with the Corporation Yard Improvement Project. Based on the results of the Phase 1 study, the consultant team prepared and implemented a sampling plan that covered the developed areas associated with the Corporation Yard including the new access drive. No resources were identified during the sampling work for the Corporation Yard improvement project. To address the western portion of the site, the City further engaged a qualified consultant to assess the project area of Stone Pine Cove. The consultant prepared a supplemental sampling plan for the proposed development footprint of Stone Pine Cove which was reviewed and approved by the City. Subsequently, the archaeological sampling studies were completed. The results were negative and are summarized in an email provided in Attachment 7. Furthermore, the conditions of approval will ensure compliance with

¹ The City applied for all 47 allocations, however, only 28 remained following the allocation process in spring 2023.

standard provisions for stoppage of work upon the discovery of archaeological, cultural, or paleontological resources.

Hazard Avoidance: The project site's exposure to hazards is substantially the same as that of the adjacent Cypress Cove townhome neighborhood. Development of the Corporation Yard and related access ensures secondary emergency access for adjacent Cypress Cove residents as well as residents of the planned Stone Pine Cove community.

Flood Hazards: A flood elevation study prepared by a qualified civil engineer determined that the Stone Pine Cove community will be located outside both the 100- and 500-year flood zones of Pilarcitos Creek. The project engineer completed studies and utilized prior Army Corps of Engineers studies. Beyond modeling, it is notable that the site experienced no flooding, pooling/ponding, or evident erosion as a result of the most significant run-off recorded from Pilarcitos Creek during the winter storms of 2022-2023. The flood levels are presented in the project plans. Like Cypress Cove, the site is located within the Pilarcitos Dam inundation zone where evacuation planning is required, as addressed below.

Seismic and Geotechnical Hazards: A geotechnical consultant reviewed the proposal and provided a letter confirming project construction requirements (Attachment 8).

Fire Hazards: The site is not mapped within a "Very High Fire Severity Zone" per the California Department of Forestry and Fire Protection (CalFire). Tree removals, including some eucalyptus trees, and new landscaping that will be irrigated and managed, will put in place ongoing fuel load management and reduce wildland fire risk for this portion of the project site. The neighborhood design complies with the California Fire Code and the Coastsides Fire Protection District's standards for emergency vehicle access. Fire hydrants and water service will comply with the Coastsides County Water District and Coastsides Fire Protection District's requirements.

Evacuation Planning: The City's Emergency Preparation and Response Division is currently developing city-wide evacuation plans that cover various scenarios including tsunami, flooding, dam inundation, and wildfire events. The City will be working with the County to develop an emergency response and evacuation plan specific to the new neighborhood. Concurrently, the City will initiate emergency response planning for the Cypress Cove community and other potentially impacted areas. This will include planning for evacuation in the unlikely event of a catastrophic failure of the Pilarcitos Dam.

Additional Considerations: Following feasibility studies of this site for housing, it had been determined that the Workforce Housing Overlay should be applied to it as documented in the public draft Cycle 6 Housing Element submitted to the California Department of Housing and Community Development on May 31, 2023. Such a designation would make

affordable housing on the site available for a wide range of lower-income households. In the meantime, because agriculture is an allowed use in the Public Facilities land use designation, and because farmworker housing is an agricultural use, the use of the proposed housing by farmworker households is already consistent with the Public Facilities land use designation. The Workforce Housing Overlay designation could still be applied to the site at a future time, but is not required for the project as proposed.

In conclusion, the Director has determined that due to emergency conditions with respect to affordable housing generally, and farmworker housing specifically, the Stone Pine Cove neighborhood development is consistent with the LCP. The follow-up Coastal Development Permit will be in line with zoning amendments to implement both the Local Coastal Land Use Plan and the Housing Element.

ANALYSIS

Additional information about the analyses used to back the findings made for this Emergency Coastal Development Permit is presented in this section. Assessments of this site have been addressed through previous relevant studies, updates to previous studies, or through new information prepared to support this Emergency Coastal Development Permit.

Stone Pine Cove Site, comprising a portion of 880 Stone Pine Road, is highlighted in blue.



Biological Resources: A comprehensive biological resources evaluation of the entire 880 Stone Pine Road property was prepared for the Corporation Yard Improvement Project. The study was circulated to resource agencies including the U.S. Fish and Wildlife Services, the Army Corps of Engineers, the California Coastal Commission, the California Department of Fish and Wildlife, and the Regional Water Quality Control Board for a 45-day comment period specified by the Local Coastal Program per Municipal Code section 18.38.035.C. Comments received on that study were addressed and the study was incorporated into the IS/MND prepared for that development pursuant to CEQA. The IS/MND was adopted by the City and the Notice of Determination was posted with San Mateo County on March 30, 2022, and April 20, 2022. The biological resources assessment evaluated the wildlife conservation corridor designed for the Corporation Yard Improvement Project. The wildlife conservation corridor, which is now implemented, created the approximately 5-acre site for the Stone Pine Cove neighborhood such that the neighborhood will be located outside of all ESHAs and associated ESHA buffers. Some of the biological mitigation measures associated with the Corporation Yard project are fully executed and complete, others apply to the construction and/or operational phases of the Stone Pine Cove neighborhood and are included as Conditions of Approval.

Traffic: The City contracted with a qualified independent traffic engineering firm to prepare a traffic study to evaluate the potential impacts of vehicle trips associated with the proposed Stone Pine Cove neighborhood relative to service levels and vehicle miles traveled (VMT). The study evaluated impacts on intersections located near the project site that would be used by future residents leaving and returning to the neighborhood. The study also considered safety impacts on Stone Pine Road for various modes of circulation, including pedestrians. At the request of some residents of the Cypress Cove neighborhood, the study also evaluated the potential for site access to be taken from Highway 92 instead of and/or in addition to the access proposed via Stone Pine Road. The traffic study is provided in Attachment 9.

The study concluded that the Stone Pine Cove neighborhood would not require additional right-of-way or other transportation-related improvements/mitigation measures. The study did not find speed-related impacts. However, based on community concern, the County and City are including traffic calming measures on Stone Pine Road from West Patrick Way to the easterly terminus of Stone Pine Road, subject to review and approval of the City Engineer and the Coastside County Fire District. The traffic calming measures are included as conditions of approval and presented in Attachment 10. Traffic calming measures are anticipated to include the following:

- Crosswalk improvements at West Patrick Way, including the addition of pedestrian-activated flashing beacons to improve pedestrian safety and provide strong visual cues to drivers
- A new high-visibility crosswalk at East Patrick Way, including new curb ramps, signage, and striping to improve pedestrian and bicycle safety
- Speed feedback signs (eastbound and westbound) to increase driver awareness
- Lane striping to narrow travel lanes to reduce vehicle speeds

- Tree trimming near West Patrick Way, to improve intersection visibility

Parking and Site Circulation: The project includes on-site parking which meets City parking standards for the minimum number of required spaces. Parking spaces will be provided within the individual lease spaces as “private” parking for each home. Additionally, the project includes guest/non-designated parking spaces throughout the site. Each access drive will be signed or painted to preclude parking to ensure access by first responders, notably the Fire District and service providers like Republic Services (solid waste).

Only one of the displaced households has more than two vehicles. Six of the smallest households have no vehicles. It is anticipated that Stone Pine Cove’s parking provisions will be fully adequate for future residents based on information about household size and automobile ownership for the 19 displaced households, as follows:

Household Size (Persons)	Number of Households	Number of Vehicles per Household
1	5	0
1	5	1
2	1	0
2	2	1
3	4	1
4	1	2
5	0	N/A
6	1	3

For additional guidance, the City also considered the parking demand of Moonridge, which is an established farmworker housing community located in unincorporated San Mateo County just south of the City limits. Over the years, it has become evident that on-site parking is inadequate for Moonridge’s current resident population. Moonridge’s unit characteristics by bedroom count and parking provisions are compared with those proposed for Stone Pine Cove in the following table:

Community/ # Parking Spaces by Unit Type	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Moonridge	N/A	1	1.5	2
Stone Pine Cove	2	2	2	N/A

On average, Stone Pine Cove will have smaller units and more parking per unit than Moonridge, with the following highlights explaining these factors:

- Moonridge does not have any one-bedroom units; Stone Pine Cove is proposed to have approximately 14 one-bedroom units.

- Moonridge has four-bedroom units, and Stone Pine Cove will not have any units that large.
- Stone Pine Cove will provide two parking spaces for each unit, whereas Moonridge provides one parking space for all its one- and two-bedroom units as well as one space for half of its three-bedroom units. Moonridge provides two spaces for half of its three-bedroom units and two spaces for all its four-bedroom units.

The new neighborhood will also include on-site property management and community policies addressing, among many things, parking. The City's approval includes a condition requiring on-site property management and rules and covenants in perpetuity regarding parking.

Stormwater Management: On-site detention areas will provide adequate capacity to handle stormwater runoff on site. Stormwater management plans are included in the project plan set in Attachment 2.

Construction Impacts: Construction is estimated to take approximately 8-12 months, dependent on weather and other site conditions. Most of the construction activities will be associated with site grading. Site grading includes the creation of the building pads, access drives, and underground utilities. Because the housing units are pre-manufactured, their installation will be relatively fast, and the normal impacts associated with site-built housing will not be present. Conditions of Approval provided in Attachment 1 include additional details determined by the City Engineer for ensuring safety before, during, and after construction.

Neighborhood Management and Support: A property management company will be contracted by San Mateo County, one of the co-applicants and the ultimate project owner. The company will provide an on-site manager who will live in the manager's unit. A small office and storage building for the maintenance and operations of the community are also included in the plans to support effective management. The management company will be responsible for ensuring that the manufactured homes are inspected at least annually and following earthquakes or other environmental conditions that could affect the structural integrity and/or safety of the homes.

As part of its oversight, the management company will also establish and enforce community policies that will be made a part of each space lease agreement. Examples of topics addressed in community policies include:

- Manufactured Home Standards and Maintenance
- Community Facilities/Shared Space Usage
- Code of Conduct
- Guests
- Parking
- Pets

In addition to on-site management and community policies, the farmworker households will find support from nearby facilities and agencies that are within walking distance of the site. Such resources include Coastside Hope (moving to Main Street in 2024), Ayudando Latinos A Soñar (ALAS), churches, the Half Moon Bay Library, schools, County Coastside Clinic, and the Ted Adcock Community Center.

Neighborhood Design: Renderings of the proposed neighborhood, as well as conceptual floor plans, are provided in Attachments 5 and 6. The homes will have pitched roofs, board and batten or equivalent quality siding, wood steps, covered entrances, and shutters. A warm and complimentary color palette with accent trim will be used for each home. Front yards will have irrigated landscaping. The open space area at the southwest corner of the neighborhood will be a City park and include active and passive spaces for public enjoyment, including a lawn area, play structure, and a hardscape court for flexible use (e.g., four square, hopscotch). The community garden at the northeast corner of the neighborhood will be an amenity for Stone Pine Cove residents. Tree plantings will enhance the neighborhood entrance and be included throughout the open space areas. Each home will have its own enclosure for solid waste bins (e.g., trash, recycling, and green waste) and storage sheds.

Conformance with the Local Coastal Land Use Plan/General Plan and the Zoning Code:

Plan conformance was presented in detail in finding #3, above.

ENVIRONMENTAL DETERMINATION

This emergency farmworker housing development is statutorily exempt pursuant to CEQA Statute Section 21080(b)(4) and CEQA Guidelines Section 15269 in that it consists of specific actions necessary to prevent or mitigate an emergency.

The IS/MND prepared for the Corporation Yard project addressed the entire site, especially concerning biological resources (Attachment 11). Additional studies have been prepared for Stone Pine Cove to evaluate the environmental impacts of the new neighborhood, including a traffic study and a site-specific archaeological resources evaluation. These studies concluded that there are no new impacts and that no new mitigation measures are needed. CEQA assessments will be updated for the follow-up Coastal Development Permit. Notably, some of the mitigation measures associated with the Corporation Yard project are fully executed and complete while others apply to the construction and/or operational phases of the Stone Pine Cove neighborhood. These measures are included as Conditions of Approval of the Emergency Coastal Development Permit.

CONCLUSION

The California Coastal Commission has been informed about this Emergency Coastal Development Permit issuance pursuant to Half Moon Bay Municipal Code 18.20.040 D. The Half Moon Bay City Council and Planning Commission have received regular updates about potential development of affordable housing on this site throughout the Housing Element update process.

and review of the Corporation Yard Improvement Project over the past two years, and the City Council is further aware of the County's efforts to secure funding for development of affordable farmworker housing on this site. This report will be provided at a public meeting of the Half Moon Bay Planning Commission on December 12, 2023.

A follow-up Coastal Development Permit will be required per Municipal Code 18.20.040 E, and CEQA review will be conducted accordingly.

Based on the above analysis, the City concludes that an emergency condition constitutes the need for this project in an expedited fashion according to the allowances provided by the certified LCP for Emergency Coastal Development Permits. The project is also found to be consistent with the Zoning Ordinance and Local Coastal Program, is compatible with surrounding uses, and conforms to the requirements of the California Environmental Quality Act. The Community Development Director has approved the Emergency Coastal Development Permit based on the required findings as stated in this report and subject to Conditions of Approval in Attachment 1.

ATTACHMENTS

1. Conditions of Approval
2. Project Plans, November 2023
3. Application Supplemental Narrative
4. Tree Removal Plan Summary, October 2023
5. Renderings, November 2023
6. Conceptual Floor Plans, November 2023
7. Archaeological Email Memo, November 2023
8. Geotechnical Consultant Letter, October 2023
9. Final Traffic Study, November 2023
10. Traffic Calming Improvements, October 2023
11. Half Moon Bay Corporation Yard IS/MND (PDP 21-053), January 2022