



December 8, 2023

Chair Kum Kum Gupta, and Members of the
San Mateo County Planning Commission
455 County Center, 2nd Floor
Redwood City, CA 94063

Re: Item # 4 on the December 13, 2023 Agenda: PLN2023-00068 (Midpeninsula Regional Open Space District) Coastal Development Permit and Grading Permit for MROSD Open Space and Restoration Program which authorizes maintenance and restoration activities over a 5-year period in unincorporated San Mateo County

Dear Chair Gupta and Commissioners,

On behalf of Green Foothills, I write in strong support of the Staff Recommendation for Approval of the above-referenced Coastal Development Permit and Grading Permit.

Midpeninsula Regional Open Space District is seeking a 5-year permit in order to streamline the permitting process for routine maintenance, small-scale facility improvements, and restoration and enhancement activities within their Open Space Preserves.

The Program's objectives include: protecting and enhancing the natural environment, improving low-intensity public access, and avoiding and minimizing potential impacts to the natural environment. Conservation outcomes for the Program have been derived from the District's Resource Management Policies, Integrated Pest Management Guidance Manual, and Wildland Fire Resiliency Program.

Streamlining the approval process for carefully designed, implemented, and monitored projects will enable the District to reduce soil disturbance/erosion, avoid water quality impacts, promote growth of native vegetation and protect and restore special-status species and sensitive habitats as well as reduce the risk of catastrophic wildlife by removing invasive plant species and/or dead and excessive vegetation accumulated due to past fire suppression.

Having personally observed many of the District's maintenance and restoration projects and activities over the years, I commend the thorough site-analysis, planning, as well as consultation/compliance with Responsible Agency requirements that form the basis of the projects covered by the proposed 5-year permit.

Accordingly, Green Foothills enthusiastically recommends that your Commission approve the requested 5-year permit.



Sincerely,

Lennie Roberts

Lennie Roberts, Legislative Advocate, Green Foothills

cc: Jane Mark, Planning Manager, MROSD
Susanna Chan, Assistant General Manager, MROSD
Alice Kaufman, Policy and Advocacy Director, Green Foothills
Luis Topete, Project Planner



San Mateo County Planning Commission
455 County Center, 2nd Floor
Redwood City, CA 94062

December 12, 2023

Subject: PLN2023-00068 – MPROSD Coastal Development & Grading Permit

Dear Honorable Commissioners,

I support the intent of the proposed 5-year permit for MPROSD project, however I do have a few questions and concerns.

The 10 – day public review period is very short to wade through 831 pages of staff report and to consider the implications of allowing work over a 5-year period in the Coastal Zone. I don't recall that MPROSD did a presentation to the Agricultural Advisory Committee or Farm Bureau on this item. This item should have gone before the Agricultural Advisory Committee since it does involve Planned Agricultural District zoned land. It also seems fitting that per the MOU between MPROSD and the San Mateo County Farm Bureau that this should have been presented to that organization for input prior to consideration by the Planning Commission. **Due to the complexity of this wide ranging 5 – year permit it would be prudent to continue this item to allow additional time for the public to review and provide input on the various aspects of this recommended approval.**

This very lengthy document required a lot of thought, research and consideration on impacts to coastal resources and what is appropriate for this 5-year permit. It is obvious that the MPROSD documents and the Planning Department's analysis took much time, effort and public dollars. Given the investment in streamlining minor maintenance and other related projects, it seems fair that the same consideration should be given to appropriate projects on private lands. It would be **very supportive to the private landowners if similar guidelines, exemptions and streamlining of the process could be developed by the Planning Department.** Most private landowners, like MPROSD, are interested in and devoted to resource protect while also having a necessity to perform routine maintenance and land upkeep activities in a timely manner. Utilizing this comprehensive information for similar activities on private lands would increase the benefits from this endeavor.

An expansion of Project Condition # 9 to require that MPROSD submit to the San Mateo County Planning Commission an Annual Work Report and Proposed Work Report for the upcoming year would be very helpful to gauge the success and methods that are being utilized. Good work records could provide support for extension of the permit and provide guidance for upcoming projects on public and private lands.

It seems that the Mitigated Negative Declaration for this project is predicated on the notion that all the MPROSD activities covered by this permit would be minor and resource protective in nature a large part of their mission and beneficiary of some of these new exemptions will be related to recreational activities that in some cases could be at odds with resource protection. This 5-year permit would allow some new low-intensity/small footprint facilities

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that could impact adjacent private agricultural lands. It is common knowledge that some of the MPROSD trail heads create congestion and associated problems for coastside property owners. Hopefully there will notification to adjacent landowners for any MPROSD projects that could disturb or disrupt their enjoyment of their property.

MPROSD is a major landowner in rural San Mateo County. What happens on their land does have a ripple effect on adjacent private lands. If this project could act as a templet to provide clarity and similar exemptions for private land under good stewardship, it could compound the positive results for the permit processing system while providing guidance for resource protection. Please consider the potential to develop a similar program for appropriate projects on private land.

Questions:

- For pond maintenance, does it matter if the pond is man-made or natural?
- When will the programmatic permits be issued by USFWS, CWF and
- Will building permits be required for the bridges?
- Will the bridges need to meet CalFire requirements for width and load capacity?
- How much land clearing can occur on a property per this permit?
- Are there limits to the amount of grading on a given parcel?

Thank you for your consideration of these letter.

Respectfully submitted,



Kerry L. Burke

Burke Land Use
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