

**CALIFORNIA COASTAL COMMISSION**

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



May 13, 2026

Camille Leung, Senior Planner  
County Government Center  
455 County Center, 2nd Floor  
Redwood City, CA 94603

**Subject: Design Review (DR) Ordinance Update**

Dear Ms. Leung:

Thank you for the opportunity to provide comments on the County's efforts to revise the current Design Review (DR) District design standards which will repeal and replace the existing Chapter 8.256 of the County's LCP IP, which regulates development in the "DR" combining district. The proposed revisions will apply objective design standards within the "DR" District (a combining district that applies additional development standards for proposals in this specific district beyond the basic standards like height, setback, floor area ratio, density, parking, etc.) to further streamline design review and to replace subjective standards, which currently cannot be enforced per State law for State-streamlined housing project types (such as Accessory Dwelling Units (ADUs)).

The amendment as submitted is not intended to change the County's existing Coastal Development Permit (CDP) requirements for development projects located within the Coastal Zone. The intent is to replace the subjective standards that the County currently uses to evaluate Design Review Permit projects with objective ones, so that such standards are as clear and user friendly as possible and assure a more streamlined review.

As proposed, the "DR" District regulations will apply to any development within an area where the DR District overlay applies, which includes most of the Midcoast LCP Project Area as well as limited areas of the rural Midcoast, San Gregorio, and Pescadero. Within the Midcoast on parcels zoned C-1, RM-CZ, or PAD, these regulations apply to residential development only. Design Review applications are always discretionary: residential projects in the Midcoast are reviewed by the Coastsides Design Review Committee, while non-residential projects and projects in other DR-combined districts are reviewed by the Design Review Administrator. Certain projects which are determined to be minor in nature and not have an adverse effect on compliance with design standards or zoning regulations may be exempt from a Design Review Permit and subject to Design Review Administrator processing only (note that this does *not* exempt such projects from CDP requirements).

In issuing a Design Review Permit, the Coastsides Design Review Committee, Design Review Administrator, or other decision-maker make written findings on whether the design of the project conforms to the "standards and guidelines" for design review

## San Mateo County—Design Review Standards

applicable to the location of the project. Chapter 8.256 includes: “General Principles Guiding Application of Design Standards” (Section 8.256.142), “General Design Recommendations” (Section 8.256.170)<sup>1</sup>, and “Design Review Standards” (8.256.180).

It is our understanding that Section 8.256.180, Design Review Standards, constitutes the proposed objective design standards, while Sections 8.256.142 and 8.256.170 provide more subjective guidance and recommendations. The design review standards are presented in the table titled “Design Review Standards & Application Table” and apply to the Midcoast and other “DR” Districts in the Coastal Zone (or more specific sub-areas, as specified in Table).

We would appreciate further clarification on the application of certain design standards within “DR” Districts in the Coastal Zone:

- Section 8.256.180(4) states that standards marked with an “X” apply to all areas of the corresponding “DR” District area (unless otherwise noted). However, Section 8.256.180(3) clarifies that, within the Midcoast, design standards marked with “X” only apply to projects within non-residential zoning districts, or to non-residential development. Please clarify the following:
  - Whether this excludes residential projects within residential zoning districts in the Midcoast.
  - Whether this conflicts with Section 8.256.010(B). Specifically, on parcels zoned C-1, RM-CZ, or PAD in the Midcoast (i.e. non-residential zoning districts) Chapter 8.256 regulations only apply to residential projects. To put it another way, please clarify if the design review standards apply to non-residential projects in these specific non-residential zoning districts in the Midcoast.

Please consider addressing the following points to improve clarity and usability of this ordinance:

- Ensure that references to the Midcoast area are consistent throughout the Chapter. Some areas refer to the “Midcoast”, or “Midcoast Project Area”, or “Midcoast LCP Project Area.” Consider adding the following: “For the purposes of this Chapter, ‘Midcoast’ means the area shown on the Midcoast LCP Project Area map included in this Chapter.”
- Section 8.256.141: please add clarification whether the “Urban Midcoast” is distinct from the rest of the Midcoast.
- Design Review Standards & Application Table: please clarify how the following areas are delineated: Montara, Rural areas, Princeton, and San Gregorio (via

---

<sup>1</sup> Project proponents are “encouraged” to consider the design recommendations of this section. Recommendations include: screening development away from neighbors and protecting private views; various architectural considerations for components such as entryways, garages, heating/cooling systems, doors and windows; landscaping along retaining walls, and; emphasizing remaining trees in landscaping design.

## San Mateo County—Design Review Standards

adopted maps showing Rural Service Centers, or delineating rural/urban boundary, if applicable).

Please also consider the following suggestions to ensure design standards applicable in “DR” Districts the Coastal Zone are consistent with the rest of the LCP and are protective of coastal resources. Generally, we recommend including a required analysis of consistency with applicable LCP standards and potential impacts to coastal resources in Section 8.256.100 (F). Findings and Decision. For example, “The Coastsides Design Review Committee, the Design Review Administrator or other decision-maker on the application must also state how the project does or does not conform with standards outlined in San Mateo County’s Local Coastal Program, accompanied by a coastal resources impact analysis.” Specifically, some of these concerns could be addressed via the following:

- Design Review Standard A(2) applies to blufftop development in “DR” Districts in the Coastal Zone, and specifies that structures shall be “set back from the edge of bluffs and cliffs a distance equal to the maximum proposed height of the building or located in areas of the property that are not visible as viewed from scenic areas below.” However, LUP Policy 9.8 regulates development on coastal bluff tops, including that development must be safely set back from the bluff edge for the economic lifespan of the project based on factors such as foreseeable erosion, site topography and geologic conditions rather than basing setbacks on building height. If application of Design Review Standard A(2) conflicts with LCP Policy 9.8, please consider adding language to Design Review Standard A(2) to clarify that Policy 9.8 should serve as the controlling policy, such as: *“In the instance that the setback required by this policy conflict with the setback required by LCP Policy 9.8, LCP Policy 9.8 shall control the required setback distance for regulation of coastal bluff top development”*
- Design Review Standard A(4): Please ensure projects near streams, creeks and other natural drainage features in the Coastal Zone comply with the LUP’s sensitive habitat policies. Likewise, Design Review Standard L(3) should ensure that landscaping is ecologically appropriate in and adjacent to areas of significance, including environmentally sensitive habitat areas, wetlands, and streams.
- Design Review Standard G(1): Please consider requiring exterior lighting to be “fully shielded” rather than “shielded”, and adding the definition of “shielded” to Section 8.256.255. For example, “Shielded means that the light rays are directed onto the site, and the light source (e.g., bulb, tube, etc.) is not visible beyond the property boundary of the site of the light source.”
- Design Review Standard J(1): Please consider subterranean garages and their adverse impacts on coastal resources. Subterranean parking can oftentimes involve large amounts of grading, can exacerbate risks in already hazardous areas (such as in geologically unstable areas or where groundwater elevations are high), and can potentially impact archaeological, paleontological, and tribal cultural resources. Please consider adding language to Design Review Standard J(1) stating that all development proposals involving subterranean parking must explicitly evaluate associated risks. For example: *“Proposals for any*

## San Mateo County—Design Review Standards


*subterranean parking development should be analyzed to ensure they minimize grading and maintain soil stability, avoid disturbance of tribal cultural resources, and are not vulnerable to groundwater rise.”*

Finally, please also consider including references to relevant LCP policies, in the following sections:

- **Section 656.20(D). E.D. Elements of Design. Grading E5. Landscaping, Paved Areas, and Fences, Lighting and Noise:**
  1. **Landscaping:** We would recommend incorporating the following language: “All landscaping plants shall be drought tolerant and consist of either native or non-invasive species (LCP Appendix 1.A).”
  2. **Paved Hardscape Areas:** We recommend adding additional language as follows: “Please refer to the County’s Drainage Manual and LCP Policy 1.35 for best management practices and further information on this topic.”
- **Design Review Standards & Application Table Standard L(3).** LCP Section 1.35 outlines specific landscaping measures intended to minimize water-quality impacts associated with new construction and redevelopment. Please consider adding an additional Standard No. 4 that provides landscaping guidelines to minimize impacts on coastal water quality, using the following language: *“New development or construction shall protect undisturbed areas from construction impacts using vegetative buffer strips, sediment barriers, filters, dikes, mulching and other measures as appropriate. Please refer to LCP Appendix 1.A for additional landscaping guidance.”*

As always, please don’t hesitate to contact me at [Melissa.Ashley@coastal.ca.gov](mailto:Melissa.Ashley@coastal.ca.gov) if you should have any questions regarding any of the above.

Sincerely,



Melissa Ashley  
Coastal Planner  
North Central Coast District  
California Coastal Commission