

**COUNTY OF SAN MATEO  
PLANNING AND BUILDING DEPARTMENT**

**DATE:** December 13, 2017

**TO:** Planning Commission

**FROM:** Planning Staff

**SUBJECT:** EXECUTIVE SUMMARY: Consideration of a zoning text amendment to the County's Mobilehome Park (MH) Zoning District (Zoning Regulations Chapter 26) to adopt a uniform 28-foot height limit for all structures on mobilehome parks in the County's Coastal Zone, and to apply a uniform method of measuring structure height in MH-zoned areas countywide that measures height from the lower of finished or natural grade.

County File Number: PLN 2017-00077

**PROPOSAL**

A zoning text amendment to the County's Mobilehome Park (MH) Zoning District (Zoning Regulations Chapter 26, Section 6535 et. seq.) establishing a uniform 28-foot height limit for all structures in MH-zoned areas in the County's Coastal Zone, and applying a uniform method of measuring structure height in all MH-zoned areas countywide that measures height from the lower of finished or natural grade to the topmost point of the structure immediately above.

**RECOMMENDATION**

That the Planning Commission recommend that the Board of Supervisors adopt a zoning text amendment to the County's Mobilehome Park (MH) Zoning District (Zoning Regulations Chapter 26, Section 6535 et. seq.) to adopt a uniform 28-foot height limit for all structures on mobilehome parks in the County's Coastal Zone, and applying a uniform method of measuring structure height in MH-zoned areas countywide that measures height from the lower of finished or natural grade to the topmost point of the structure immediately above.

**DISCUSSION**

On September 26, 2017, the San Mateo County Board of Supervisors adopted a new MH (Mobilehome Park) Zoning District, as Chapter 26 of the County Zoning Regulations. This chapter replaced the County's Trailer Camp regulations, previously codified in Ordinance Code Chapter 5.92. The new MH zoning regulations establish land use regulations, performance standards, and permitting requirements for

mobilehome parks, including height limitations for mobilehomes, ancillary uses, and conditionally permitted affordable housing.

When adopting the new regulations, the Board of Supervisors directed staff to prepare and submit the modifications included in the proposed amendment: a 28-foot uniform height limit for structures on MH-zoned mobilehome parks in the County's Coastal Zone, and amendments requiring structure height to be measured from the lower of natural or finished grade.

Currently, the MH Zoning District allows heights of up to 28 feet for mobilehomes, and 36 feet for conditionally permitted affordable housing uses, and measures height from the average (grade), rather than the lower of natural or finished grade. The proposed amendment would apply a 28-foot height limit to all structures in MH-zoned areas in the County's coastal zone, and would require height measurement from the lower of natural or finished grade to the topmost point of the structure immediately above, in all MH-zoned areas, inside and outside of the County's Coastal Zone.

Mobilehome Park locations:

1. Bayshore Villa Manufactured Housing Community  
3499 E. Bayshore Road, Redwood City.
2. Trailer Villa, 3401 E. Bayshore Road, Redwood City.
3. Belmont Trailer Park, 100 Harbor Boulevard, Belmont.
4. Redwood Trailer Village, 855 Barron Ave, Redwood City.
5. Sequoia Trailer Park, 730 Barron Ave, Redwood City.
6. Pillar Ridge, 164 Culebra, Moss Beach (in the County's Coastal Zone).

ENVIRONMENTAL REVIEW

The County prepared an Initial Study and Negative Declaration for the prior adoption of the MH Zoning District, and that District's application to various mobilehome parks in the unincorporated County, including Pillar Ridge, the only park in the County's Coastal Zone currently zoned MH. That environmental review determined that there are no potentially significant impacts from adoption of the proposed amendments. As the proposed amendments constitute a reduction in the development intensity allowed by the MH Zoning District, there is no potential for additional environmental impact. That prior Initial Study and Negative Declaration were posted on July 26, 2017, and no comments were received.

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**RECOMMENDATION**

That the Planning Commission recommend that the Board of Supervisors:

Adopt a zoning text amendment to the County's Mobilehome Park (MH) Zoning District (Zoning Regulations Chapter 26, Section 6535 et. seq.) to adopt a uniform 28-foot height limit for all structures on mobilehome parks in the County's Coastal Zone, and to apply a uniform method of measuring structure height in MH-zoned areas countywide that measures height from the lower of finished or natural grade to the topmost point of the structure immediately above.

**BACKGROUND**

Report Prepared By: William Gibson, Project Planner, 650/363-1816

Appellant: N/A

Applicant: San Mateo County Planning and Building Department

Owner: N/A

Locations:

1. Bayshore Villa Manufactured Housing Community, 3499 E. Bayshore Road, Redwood City.
2. Trailer Villa, 3401 E. Bayshore Road, Redwood City.
3. Belmont Trailer Park, 100 Harbor Boulevard, Belmont.
4. Pillar Ridge, 164 Culebra, Moss Beach.
5. Redwood Trailer Village, 855 Barron Ave, Redwood City.
6. Sequoia Trailer Park, 730 Barron Ave, Redwood City

APNs: Various

Size:

Bayshore Villa: 7.92 acres

Trailer Villa: 6.03 acres

Belmont Trailer Park: 3.19 acres

Pillar Ridge: 19.33 acres

Redwood Trailer Village: 1.53 acres

Sequoia Trailer Park: 4.61 acres

Existing Zoning: MH

General Plan Designation:

Bayshore Villa Manufactured Housing Community: High Density Residential

Trailer Villa: High Density Residential

Belmont Trailer Park: Medium Density Residential

Pillar Ridge: Medium High Density Residential

Redwood Trailer Village: Medium Density Residential

Sequoia Trailer Park: Medium Density Residential

Sphere-of-Influence: Half Moon Bay; Belmont; Redwood City

Existing Land Use: Fully developed mobilehome park with a variety of mobilehomes and other temporary, semi-temporary, and permanent residential structures and ancillary uses.

Water Supply: N/A

Sewage Disposal: N/A

Flood Zone: N/A

Environmental Evaluation: The proposed modifications are within the scope of the Initial Study and Negative Declaration prepared for the adoption of the MH Zoning Regulations and application of those regulations to various mobile home parks in the unincorporated County, as approved by the Board of Supervisors on September 26, 2017. The proposed amendment also constitutes a reduction in the development intensity allowed by that prior adoption. The Initial Study and Negative Declaration for the MH Zoning adoption were circulated beginning on July 26, 2017.

Setting: N/A

**DISCUSSION**

A. KEY ISSUES

1. Project Description

The project is a proposed zoning text amendment to the County's Mobilehome Park (MH) Zoning District (Zoning Regulations Chapter 26, Section 6535 et. seq.) to adopt a uniform 28-foot height limit for all structures on mobilehome parks in the County's Coastal Zone, and to apply a uniform method of measuring structure height in MH-zoned areas that measures height from the lower of finished or natural grade to the topmost point.

Only MH-zoned areas in the County's Coastal Zone would be effected by the proposed change in maximum height. The only MH-zoned area currently in the Coastal Zone is the Pillar Ridge Mobilehome Park, at 164 Culebra, Moss Beach.

Currently, the MH zoning district allows heights of up to 28 feet for mobilehomes, and 36 feet for conditionally permitted affordable housing uses, and measures height from the average (grade), rather than the lower

of natural or finished grade. The proposed amendment would apply the 28-foot height limit to all structures in MH-zoned areas in the County's coastal zone, and would implement height measurement from the lower of natural or finished grade to the topmost point of the structure immediately above. All MH-zoned areas would be affected by the proposed change in measurement of height, although the potential impacts of such a change are negligible.

2. MH (Mobilehome) Zoning District

On September 26, 2017, the San Mateo County Board of Supervisors adopted a new MH (Mobilehome Park) Zoning District, as Chapter 26 of the County Zoning Regulation. This chapter replaced the County's Trailer Camp regulations, previously codified in Ordinance Code Chapter 5.92. The new MH zoning regulations establish land use regulations, performance standards, and permitting requirements for mobilehome parks, including height limitations for mobilehomes, ancillary uses, and conditionally permitted affordable housing uses in mobilehome parks.

3. Board of Supervisors Action and Direction.

The Board of Supervisors, when adopting the new regulations, directed Planning and Building Department staff to prepare and submit the modifications included in the proposed amendment: a 28-foot uniform height limit for structures on MH-zoned mobilehome parks in the County's Coastal Zone, and a method of measuring structure height from the lower of natural or finished grade. The proposed amendments specifically respond to the Board's direction.

4. Summary

The proposed amendments to the MH Zoning District follow the direction of the County Board of Supervisors, and establish a uniform 28-foot height for all structures in MH-zoned areas of the County's Coastal Zone, with height measured from the lower of natural or finished grade in all MH-zoned areas.

B. ALTERNATIVES

The alternative to adoption of the proposed zoning text amendments is to forgo any or all of these amendments, maintaining the currently allowed height and/or height measurement methodology as-is.

C. ENVIRONMENTAL REVIEW

The County prepared an Initial Study and Negative Declaration for the prior adoption of the MH Zoning District, and that District's application to various mobilehome parks in the unincorporated County, including Pillar Ridge, the only park in the County's Coastal Zone currently zoned MH. That environmental review determined that there are no potentially significant impacts from adoption of the proposed amendments. As the proposed amendments constitute a reduction in the development intensity allowed by the MH Zoning District, there is no potential for additional environmental impact. That prior Initial Study and Negative Declaration were posted on July 26, 2017, and no comments were received.

D. REVIEWING AGENCIES

County Counsel

**ATTACHMENTS**

- A. Recommended Findings
- B. Ordinance amending MH Zoning Regulations
- C. Map of Mobilehome Parks

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County of San Mateo  
Planning and Building Department

**RECOMMENDED ACTIONS**

Permit or Project File Number: PLN 2017-00077      Hearing Date: December 13, 2017

Prepared By: William Gibson,  
Project Planner

For Adoption By: Planning Commission

**RECOMMENDED ACTIONS**

Recommend that the County Board of Supervisors:

Adopt the proposed zoning text amendment to the County's Mobilehome Park (MH) Zoning District (Zoning Regulations Chapter 26, Section 6535 et. seq.) establishing a uniform 28-foot height limit for all structures in MH-zoned areas in the County's Coastal Zone, and applying a uniform method of measuring structure height in all MH-zoned areas countywide that measures height from the lower of finished or natural grade to the topmost point of the structure immediately above.

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**[DRAFT] ORDINANCE NO. .**  
**BOARD OF SUPERVISORS, COUNTY OF SAN MATEO,**  
**STATE OF CALIFORNIA**

\* \* \* \* \*

**AN ORDINANCE AMENDING COUNTY ORDINANCE CODE, DIVISION VI, PART ONE (ZONING REGULATIONS) CHAPTER 26 (MH ZONING DISTRICT) SECTION 6541, REGARDING MAXIMUM HEIGHT IN MOBILEHOME PARKS**

The Board of Supervisors of the County of San Mateo, State of California, hereby finds and declares as follows

\* \* \* \* \*

**WHEREAS**, on September 26, 2017, the San Mateo County Board of Supervisors adopted a new Mobilehome Park (MH) Zoning District, as Chapter 26 of the County’s Zoning Regulations; and

**WHEREAS**, the MH Zoning District establishes land use regulations and performance standards regulating the creation, design, operation, and maintenance of mobilehome parks in the unincorporated County; and

**WHEREAS**, the MH Zoning District establishes various height limits that apply to structures in MH-zoned areas; and

**WHEREAS**, the MH Zoning District does not specifically establish a method of measuring structure height; and

**WHEREAS**, at the time of adoption of the MH Zoning District, the Board of Supervisors directed staff to prepare two subsequent amendments: (1) limiting the height of structures in MH-zoned areas within the County’s Coastal Zone to a uniform 28 feet, and (2) establishing that height of structures in all MH-zoned areas will be measured from the lower of natural or finished grade; and

**WHEREAS**, the County prepared an Initial Study and Negative Declaration for that prior adoption of the MH Zoning District, and the application of that zoning district to various County mobilehome parks, consistent with the requirements of the California Environmental Quality Act, and determined that the proposed amendments had no potentially significant environmental impacts; and

**WHEREAS**, the Board of Supervisors, in its independent judgment and analysis, considered the Initial Study and Negative Declaration, along with comments received, and found on September 26, 2017, on the basis of the whole record before it that, there is no substantial evidence that the project will have a significant effect on the environment; and

**WHEREAS**, the proposed amendments to mobilehome heights in the Coastal Zone, and the amended method of calculating height, are within the scope of that Initial Study and Negative Declaration, constitute a reduction of the possible development intensity allowed by and the Ordinance assessed by the Initial Study, and are consistent with the Board's finding that the project will have no significant impact on the environment; and

**WHEREAS**, the proposed amendments to the allowed height of structures in MH-zoned areas in the County's Coastal Zone constitute an amendment to the Implementation Plan of the County's Local Coastal Program; and

**WHEREAS**, the proposed amendments to allowed height in MH-zoned areas within the County's Coastal Zone are consistent with the County's Local Coastal Program; and

**WHEREAS**, on adoption, the proposed amendments will be submitted to the California Coastal Commission for review and certification.

**NOW, THEREFORE**, the Board of Supervisors of the County of San Mateo, State of California, **ORDAINS** as follows:

**SECTION 1.** The San Mateo County Ordinance Code (Zoning Regulations), Division VI, Part One, Chapter 26, Section 6541, General Standards for Mobile Home Parks, Section 6541.4, "Maximum Height," is amended to read as follows:

4. Maximum Height

- a. The height of structures in all areas zoned MH shall be measured from the lower of natural or finished grade to the topmost point of the building immediately above.
- b. The maximum height of mobilehomes, RVs, trailers, and other residential structures in a mobilehome park shall be 36 feet, except within the County's Coastal Zone, where the maximum height shall be 28 feet.
- c. The maximum height of any conditionally permitted use described in Section 6538.2 (a), (b), (c), (d), (e), and (f) shall be 28 feet.
- d. The maximum height of any conditionally permitted use described in Section 6538.2 (g), (h) and (i) may exceed 28 feet, up to a maximum of 60 feet, on issuance of a conditional use permit, except within the County's Coastal Zone, where the maximum height shall not exceed 28 feet.

**SECTION 2.** This Ordinance shall be effective thirty (30) days from the passage date thereof, except in the County's Coastal Zone, where it shall be effective immediately upon certification by the California Coastal Commission.

Regularly passed and adopted this DAY of MONTH, YEAR

*AYES and in favor of said ordinance:*

*Supervisors:*

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

*NOES and against said ordinance:*

*Supervisors:*

\_\_\_\_\_  
\_\_\_\_\_

*Absent Supervisors:*

\_\_\_\_\_  
\_\_\_\_\_

\_\_\_\_\_  
*President, Board of Supervisors  
County of San Mateo  
State of California*

*Certificate of Delivery*

*I certify that a copy of the original ordinance filed in the Office of the Clerk of the Board of Supervisors of San Mateo County has been delivered to the President of the Board of Supervisors.*

\_\_\_\_\_  
*Deputy Clerk of the Board of Supervisors*