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Land Use Permit Streamlining

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September 17, 2025

Ms. Summer Burlison, Senior Planner
Mr. Sam Becker, Planner 2
County of San Mateo
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VIA ELECTRONIC and HAND DELIVERY.

Re: 1815 Cordilleras Road Emerald Lake Hills – General Plan Land Use Map Amendment, Vesting Tentative Subdivision Map for Five Lots, Grading Permit, and CEQA Initial Study.

Dear Summer:

On behalf of my client, Edenbridge Homes, for the purpose of this request dba as Jefferson 10 Investors LP, a California Limited Partnership, I respectfully offer the following application considerations and facts.

This proposal consists of a General Plan Map Amendment from low density to medium-low density and a Vesting Tentative Subdivision Map of Five Lots to divide the subject parcels totaling 1.87 acres (81,299 square feet +/-) each meeting the RH/DR lot size criteria as verified by the slope analysis. We are also applying for a major grading permit for the whole project to add the elements of concurrence and detail to better facilitate the CEQA Initial Study. The subject parcels (APN 057-070-090 and APN 057-063-010) were lawfully established as a portion of Lot 34 "Map of Johnson Subdivision on October 4, 1909.

The property presently contains a circa 1950s main residence, a guest house and utility shed, a second shed, a garage, a swimming pool, and landscaping consisting of lawn area, trees, and a stone retaining wall with stairs leading to elevated landscaping. Both the site and the immediate neighborhood would greatly benefit from the removal of the present structures. The addition of five new homes will facilitate the County's meeting its Regional Housing Needs Allocation (RNHA) and benefit economically from a significant increase in property taxes derived from five new custom homes and other features such as landscaping.

The proposed subdivision will bring the property into compliance with General Plan Policy 8.30 to "Encourage the infilling of urban areas where infrastructure and services are available"; and Policy 8.32 a. to "Encourage efficient and effective infrastructure (e.g.) water supply, wastewater, roads) necessary to serve the level of development allowable within urban areas".

The site is presently zoned RH/DR; therefore, no zone change is needed. Further, the entire surrounding area which includes nearby land is zoned RH which eliminates any "spot" zoning

consideration. Parcel 1 is 14,300 square feet, Parcel 2 is 14,954 gross square feet and 13,156 net square feet, Parcel 3 is 17,069 gross square feet and 16,622 net square feet, Parcel 4 is 19,433 gross square feet and 17,123 net square feet, and Parcel 5 is 14,134 gross square feet and 12,869 net square feet. Under the County's RH District regulations all lots must be a minimum of 12,000 square feet. All five lots easily comply with all RH/DR development standards.

Prior to the filing of this application package, our team has consulted with the California Water Service Company (Cal Water) and procured a "Conditional Will Serve letter dated January 10, 2025, that is included with this application.

Sewer Service to all lots will be provided by San Mateo County through the Emerald Lake Hills Sewer Maintenance District as described in the District's pre-application plan review memo dated June 13, 2025.

In addition to standard County Application Forms the following technical documents and reports in support of the VTSM application are included in this filing package.

- A Planning and Building Department Slope Analysis.
- MacLeod and Associates VTSM with Preliminary Grading & Drainage Details.
- MacLeod and Associates VTSM with Erosion & Sediment Control Plan.
- MacLeod and Associates C.3 and C.6 Checklist and Calculations.
- MIG Consultants Biological Resources Assessment.
- Basin Research Associates Cultural Resources Investigation.
- Hexagon Transportation Consultants, Inc's Transportation Analysis Letter dated December 16, 2024, indicates this project is anticipated to generate 47 daily vehicle trips over a period of 24 hours. 47 vehicle trips per day is less than half of the 110 vehicle trips that the California Office of Planning and Research deems significant. Accordingly, the letter states that no further traffic analysis is warranted.
- Geotechnical Investigation Report dated December 18, 2024, by Stevens, Ferrone, and Bailey Engineering Company. This report addresses site and area geology, seismicity, slope stability, liquefaction potential, site conditions, and provides conclusions and preliminary recommendations. The report concluded that the contemplated subdivision of five home sites is feasible. This analysis will assist the project's civil engineer in preparation of a final grading plan in consultation with the architect and a structural engineer to facilitate post-tension slab foundations for each home.
- Mayne Tree Expert Company, Inc.'s Arborist's Report dated November 16, 2024, prepared by Jeromey A. Ingalls. This report was undertaken in compliance with the International Society of Arboricultural and San Mateo County's standards for assessing the health of forty-nine trees including five within the San Francisco Public Utilities Commission's (SFPUC) property of 6" in diameter or greater located within ten feet of the property line. These trees were surveyed and plotted by the project engineer Dan MacLeod. Because no home designs are included in the vesting tentative subdivision application package, Mr. Ingalls provided general remedial tree care and preservation recommendations. As specific home designs and landscaping plans undergo county design review, all trees included in the Arborist's report will be subject to field consultation with the Arborist, county staff, and project contractors to establish tree protection

zones, protocols for preservation or removal, supervisory inspections, and specific tree replacement requirements.

- Lawyers Title Company Preliminary Title Report updated August 15, 2025.
- Recorded Grant Deed dated October 18, 2024, and a current Secured Tax Bill.
- A CEQA Initial Study application checklist is included as required by the State of California involving the legislative act of amending the site's General Plan designation from low to medium-low density. Accordingly, we anticipate the Initial Study and Mitigated Negative Declaration will result in certification given the fact-based absence of any significant impacts that could not in the worst case be mitigated.

While I have managed to procure the approval of four previous ELH General Plan amendments, I also cite a third clearly established precedent granted by the Board of Supervisors. That application was PLN2006-00128 for Ronald and Sally Edwards. My client's proposal clearly mirrors Edwards' approval in terms of policy application and approval rationale. That precedent addressed the following key considerations that apply to the subject property and application as follows:

Conformance with the General Plan – The present Low Density Residential land use map designation of 0.3 to 2.3 dwellings per acre do not allow this underutilized resource to be subdivided even though it will easily comply with its RH/DR zoning for a five-lot subdivision. However, a land use map amendment to the Medium-Low Density Residential designation of 2.4 to 6 dwellings per acre would facilitate such division on the low end of that range at 2.94 net dwellings per acre. Edwards' approval at 3.6 dwelling units per acre exceeded this proposal. Therefore, there is consistency between the proposed General Plan Medium-Low Density Residential land use designation and the implementing RH zoning of the subject property. Based upon a review of the patch work quilt lot sizes within ELH and the immediate neighborhood, the proposed land use map amendment and subdivision into five lots would be entirely in keeping with current density, land uses, and character of the surrounding neighborhood.

In addition, this application will be in compliance with the following applicable Urban Land Use Policies for the ELH Area:

Policy 7.16 - Provides for revitalization of existing developed neighborhoods without creating urban sprawl. This proposed amendment will foster these goals by facilitating efficient use and renewal of the site. As indicated in my aforementioned property description, the site presently contains a circa 1950s main residence, a guest house and utility shed, a second shed, a garage, a swimming pool, and landscaping consisting of lawn area, trees, and a stone retaining wall with stairs leading to elevated landscaping. Approval will lead to the removal of the 1950s structures and replacement with five new custom homes and associated landscaping.

Policy 8.12 - a (2) - "Adopt the land use designations and amendments thereto, of the Emerald Lake Hills Community Plan".

Policy 8.12 - C (3) - "Amending the land use designations of existing area plans".

Policy 8.13 - The requested medium low density land use designation complies with the five locational policy criteria for the ELH area. In addition, low density and medium-low density designated parcels are dispersed throughout the area. Further, incorporated Emerald Lake Hills parcels within the City of Redwood City are designated low density on the City's land use plan that allows for up to seven dwelling units per acre under the City's more generous RH zoning provisions.

Policy 8.14 - a - "Utilize as guidelines only, the designations and densities shown in Table 8.1P to achieve stated land use objectives within unincorporated Urban Communities, Urban Neighborhoods and Special Urban Areas". The subject property is located within both (1) a designated unincorporated community, and (2) designated urban neighborhood.

Policy 8.14 - b - "Use the criteria in Table 8.1P, as guidelines only, to locate land use designations in urban unincorporated areas".

8.15 - a - "Protect and enhance the character of existing single-family areas". This proposal maintains the single-family land use of the neighborhood while revitalizing the underutilized site with five character enhancing modern custom homes.

Policy 8.30 – This policy calls for infilling, or in this case, refilling of an established urban area. In support of Policy 8.30, all essential public service infrastructure is in place to provide the full range of urban services to the subject property. Such services support the approval of the land use map amendment and VTSM. Furthermore, private capital will accomplish beneficial connections to the County's Emerald Lake Hills Sewer Maintenance District and extension of Cal Water's service main and potentially other public utilities serving the subdivision such as PG&E and Cable Television. These site enhancements benefit other properties within the immediate neighborhood. Approval of this project will substantially improve the quality of the local housing supply and its associated infrastructure without encroachment into undeveloped areas or increasing urban sprawl.

Policy 8.32 - a - "Encourage efficient and effective infrastructure (e.g., water supply, wastewater, roads) necessary to serve the level of development allowable within urban areas". This proposal fully complies with the stated General Plan policy.

Policy 8.36 - This density policy calls for the regulation of maximum allowable densities in zone districts to ensure that the intensity of development is consistent with land use designations. The ELH Land Use Plan has been in place since 1979 and was adopted with imprecise broad brush land use densities. In fact, the last three Environmental Services Agency Managers/Community Development Directors have openly acknowledged that the plan's land use density designations were very broadly applied without regard to an individual property's specific urban service capabilities, slope density considerations, or the established neighborhood development pattern. Density designations were based upon the broadest general criteria in connection with the development of a public sewer system for the ELH plan area. Accordingly, over time there have been a substantial number of land use plan density amendments granted to balance a property's access to services, facilities, and public infrastructure where there is minimal exposure to natural or manmade hazards. In the case of the subject property, the land use amendment to medium-low density would be in complete keeping and character with the immediate neighborhood and the larger ELH plan area. Further, the resulting subdivision into five lots and associated construction of five custom built single-family homes can be accomplished in total compliance with the existing RH/DR district zoning regulations and applicable building codes.

Conformance with the ELH Community Plan - The proposed Land Use Map Amendment and subdivision comply with all applicable policies of the ELH Community Plan. Future replacement of the site's existing site structures, subdivision into five lots, and construction of new custom homes would result in the same overall site density at 2.94 net dwelling units per acre well in keeping with the existing neighborhood pattern and character. Further, this proposal complies with the land use and open space conservation objectives of the ELH Community Plan because it does not conflict with identified potential community park locations.

Conformance with Zoning Regulations – As indicated in previous paragraphs and as evidenced on the accompanying vesting tentative subdivision map of five lots, the size of the relatively level subject parcel of 81,299 square feet is more than adequate to comply with cross-slope, minimum lot size, and associated easement requirements of the RH zoning district.

In closing, please feel free to contact Eric Zweig, Dan MacLEOD, or me if this letter or any component of the application package requires clarification or supplemental information. This comprehensive letter is intended to facilitate a clear understanding of the application by staff, the Planning Commission, and the Board of Supervisors as to the basis and facts of this request, its correlation with a precedent approval, and its consistency with the County's policy and zoning regulations. Accordingly, please include this letter with the staff reports to the Commission and Board.

Regards,



J. R. Rodine

cc: Pat Geary
Kirk McGowan
Eric Zweig
Dan MacLeod
Members of the Planning Commission/With Staff Report
Members of the Board of Supervisors/With Staff Report