

## Reponses to Comments

Comment Letter D	
<p style="text-align: center;">Sally Cobb Comments Mar 13 2013.txt</p> <p>From: Sally Cobb [sallycobb@live.com]            Sent: Wednesday, March 13, 2013 8:31 AM            To: Stiehl, Carl            Subject: my feedback on the draft new equine ordinance</p> <p>Good morning Carl,</p> <p>I sent these comments to Oliver Smith and the other members of the VCCPG subcommittee, and I wanted to make sure you have them as well. I mentioned some of these at the VCCPG equine subcommittee meeting on the 6th.</p> <p>The County may want to include these equine land uses in the new ordinance. There are questions as to which Tier these fall into:</p> <ul style="list-style-type: none"> <li>* Raising/training/selling young horses (occupant owned).</li> <li>* Quarantine (horses from other states and countries).</li> <li>* Professional horse hauler layovers of horses in transit.</li> <li>* Breeding, foaling, and selling horses. Most breeding facilities involve boarding broodmares for repro work, assisted foaling, foal training, etc. (Vessels, Creekside, Irish Oaks, and many others). The current ordinance considers "occasional" sales of horses and foals to be in the category of horsekeeping (non-commercial), but breeding facilities that advertise, have websites, etc., are obviously commercial.</li> <li>* Creekside, Irish Oaks, and other facilities allow horses to be trailered in and out to save the call fee for vaccinations and other vet work, and horses are boarded for surgeries, etc.</li> <li>* Lessons on occupant-owned horses (no boarding, just lessons). My neighbor does this. Which tier does this come under, or does she need a special license?</li> <li>* Kids camps using occupant-owned horses (no boarding just daily kids camps from 9am to 1pm, or 5pm, with some overnights).</li> <li>* Clubs which have horse shows and other events where horses are trailered in and out and not boarded.</li> <li>* 501C3 Equine Rescues like Falconridge, Hoofs &amp; Woofs, and dozens more where the horses are owned by the Non-Profit Organization (I believe this is the case; the horses are not owned by the SPCA or the County), some horses may be boarded, usually a trainer is onsite, as well as volunteers and paid staff. The public is frequently allowed onto the property to evaluate horses for adoption. I have heard that Falconridge has "overflow facilities". One such facility has 12 horses boarded on one acre of useable land.</li> <li>* Wounded Warrior Equine Therapy, REINS Riding for the Handicapped, and dozens of land uses like this where most of the horses are occupant-owned and used for therapy with members of the public. Usually these are 501C3 Non-Profits organizations.</li> <li>* Used Tack and Consignment stores at equestrian facilities (REINS Tack Shack, BITS, and others). These land uses are not included in the ordinance but provide important services to the equestrian community.</li> <li>* Horse sales and public auctions - will this be included in tier 2?</li> <li>* What about breeding farms that may have 200 horses at the facility during breeding</li> </ul> <p style="text-align: center;">Page 1</p>	<p><b>Response to Comment Letter D</b></p> <p><b>Sally Cobb</b>  <b>March 13, 2013</b></p> <p><b>D-1</b> These comments have been received by the County.</p> <p><b>D-2</b> These land uses would all be included under a Horse Stable, the ordinance is not proscriptive, it does not list every use that could potentially be considered, but any service-based commercial use of horses would be a Horse Stable. All of these uses are ones where the public would be coming on the property or bringing their horse onto the property for a service, therefore they would be allowed under a permitted stable and considered part of the commercial use of a horse stable.</p> <p><b>D-3</b> All of these land uses are a Horse Stable, see the similar uses and discussion in D-1, it is a service, therefore commercial. The type of permit required depends on the tiers in the draft ordinance. Less than 50 horses, at a maximum of 10 horses per acre of usable area, would be required a Zoning Verification Permit.</p> <p><b>D-4</b> A used tack or consignment store would be a retail establishment under the Zoning Ordinance, requiring a commercial zone. Therefore, this use would likely not be allowed where horse stables are allowed since horse stables are usually allowed in residential and</p>

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<p style="text-align: center;">sally Cobb comments Mar 13 2013.txt</p> <p>season, but only 50 horses at the facility during other times of the year?          * Will there be any distinction between stables that have horses but no people, such as Saddlecreek Farm where people board their horses that are retired, on layup, young foals, etc. In this case there are far less impacts than a boarding stable where people use the facility.          * Within Tier 2, are horse shows, clinics, registry keurings, inspections, and other public events allowed? How many and how often?</p> <p>Every business operator wants to be legal before they invest time and money. It is important that the new ordinance is clear. The main complaint I hear from the public in regards to the current ordinance is that it is vague and confusing.</p> <p>*****</p> <p>Speaking from personal experience, it is extremely important that the county provide a general total cost estimate (even high-low) for the tier 2, 3, 4 permits. Cost estimates can be gathered from land use consultants and the county's list of approved CEQA consultants.</p> <p>This way the county will serve the equestrian community with an estimate of the big picture costs involved with obtaining each permit. The county discloses their fees, but the majority of the costs for a permit have to do with engineers, CEQA study processing (tiers 3 &amp; 4), required improvements, fire marshal requirements, etc. Then there are the costs of bringing an old property into compliance with current code. There were many surprises along my 6-year, \$150K, MUP journey which could have been prevented with better disclosure on the part of the county.</p> <p>The equestrian community should be made aware that there are other fees involved with operating an equine business including the county's TIF (Traffic Impact Fee), the annual Ad valorem Tax for operating an Agriculturally-zoned business, an annual stormwater inspection by the DPW, and an annual fee for water use for commercial stables.</p> <p>San Mateo county has a large animal permitting process which begins with a brochure for the public that answers questions about operating a commercial equine business. They have liaison volunteers that serve to bridge the gap between county staff and equestrians. I would very much like to see a streamlined, full disclosure, open-communication, permitting process with helpful and knowledgeable county staff serving equestrian businesses operators and both parties working together harmoniously.</p> <p>Thanks much,          sally</p> <p style="text-align: center;">Page 2</p>	<p>agricultural zones. Staff is not aware of any zones in the County that allow a commercial horse stable and a used or consignment store in the same zone, typically these types of uses are not found in the same zones in staff's experience.</p> <p><b>D-5</b> Incidental Horse Sales as part of a breeding operation would be allowed under Tier 2. Public Auctions of any type of animal is a different use type allowed with a Major Use Permit, pursuant to Animal Sales and Services: Auctioning in Section 1425.a of the Zoning Ordinance. Such a use would not be part of a horse stable. This requirement is not proposed to change.</p> <p><b>D-6</b> The Horse Stable must be permitted to have 200 horses if they are there for a breeding season. This would be a Major Use Permit under the draft ordinance because it's more than 100 horses. The permitting for the Horse Stable is based on horse numbers, not people. Facilities must be permitted appropriately, a stable could change ownership and just as easily have people the next day, therefore the ordinance plans for the most impactful scenario with limitations and regulations that apply regardless of people or not.</p> <p><b>D-7</b> In Tier 2, there are 6 public events allowed per year with the appropriate permits pursuant to the Temporary Uses in Zoning Ordinance section 6100. A horse event in this case is a Circus, Carnival, or Other Outdoor Entertainment Event as limited under section</p>
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	<p>6106. A Horse Stable which proposes more events than the 6 already allowed would need a permit under Tier 3 or 4.</p> <p><b>D-8</b> This comment does not raise an environmental issue for which a response is required.</p> <p><b>D-9</b> This comment does not raise an environmental issue for which a response is required. It should be noted that the proposed project would streamline the permitting process and provide more cost effective alternatives to uses that do not require a Major Use Permit under Tier Four criteria, as described in Chapter 1.0, Project Description, of the DEIR.</p> <p><b>D-10</b> This comment does not raise an environmental issue for which a response is required. It should be noted that the County has meet with the equestrian community on several occasions to discuss the proposed project’s streamline approach, cost effectiveness and answer any question.</p> <p><b>D-11</b> Comment noted. County staff has worked with the equestrian community to open lines of communication and answer questions during the proposed project processing.</p>
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