

Midcoast Community Council

*An elected Advisory Council to the San Mateo County Board of Supervisors
representing Montara, Moss Beach, El Granada, Princeton, and Miramar*

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Date: November 10, 2014

To: San Mateo County Planning Commission

Cc: SMC Board of Supervisors
Coastal Commission staff: Nancy Cave, Jeannine Manna

Subject: **Revised Big Wave North Parcel Alternative Project (PLN2013-00451)**

The Midcoast Community Council (MCC) has held five public meetings¹ on the Big Wave (BW) North Parcel Alternative (NPA) to receive applicant and County presentations and community input. We submitted comments on the March 2014 project referral, and on the July 2014 NPA Project and EIR Addendum. We are pleased that many of our previous questions and concerns have been addressed, however there still remain significant concerns, some greatly amplified by the suddenly revised project.

PROJECT REVISION

The project description, site plan, landscape plan, building designs and subdivision map have recently been completely revised from what was presented to MCC in August and circulated in the EIR Addendum that we carefully reviewed and commented on previously. The new plans are sketchy and lack necessary detail and there have been only a few days to attempt to study them. The hefty Final EIR Addendum with response to comments (on a now out-of-date plan) and the staff report revealing the new plans, were only released to the public on November 6 for your November 12 hearing.

DESIGN REVIEW

The sudden last-minute redesign that consolidated the project from nine into four much larger buildings is attributed in the staff report to the direction of the Coastside Design Review Committee (CDRC). In fact, the CDRC did not recommend fewer buildings. CDRC voted 2-1 to recommend denial at their November 3 meeting. The comparative scale of this project has been a major concern for CDRC, and the consolidated buildings are now even more out of scale with their surrounding neighborhood.

Staff has attempted to incorporate some revisions discussed by the CDRC as Condition 88; however, thoughtful design of such a large and complex project cannot be accomplished by permit conditions and without public review and approval by the Planning Commission. Moreover, the building footprints (location, size, shape, orientation) will be permanently set by approval of the Vesting Tentative Subdivision Map.

CDRC and the project engineer worked hard this fall and were making incremental progress toward bringing the design into compliance with the Community Design

¹ 11/13/13, 4/9/14, 8/13/14, 8/27/14, 11/10/14

Standards, except for the detour into consolidation of the buildings. We understand there is a new, follow-up site plan proposal, which the community and decision makers have not had a chance to review. This plan has eight smaller buildings, instead of the four presented in the Staff Report. This alternative works off concepts gleaned in discussion with CDRC and retains and expands on those improvements.

This project is proposed to be developed over 15 years and will be a part of the community beyond all our lifetimes. The County and the community should be able to take the necessary time to allow clear and precise revisions to the site plan, elevations, and Vesting Tentative Map. Approval of a thoughtful design through the public process would create lasting value for the community as well as for the applicant.

PROJECT SCALE

Community Design Manual: “Structures should relate in size and scale to adjacent buildings and to the neighborhood in which they are located.”

LCP Policy 3.13 Maintenance of Community Character: requires that new development providing significant housing opportunities for low and moderate income persons contribute to maintaining a sense of community character by being of compatible scale, size, and design.

Massive buildings out of scale: The footprint of each building in the revised NPA Project would fill an entire block in Princeton (see attached image). The revised Wellness Center two-story building would present to the neighboring single-story Pillar Ridge community an unbroken wall 360 feet long lined with second-story balconies. The building footprint is almost two acres.

Reduce square footage: The reduced NPA Office Park scale (189,000 s/f in last summer’s project description) is an improvement over the 2010 project denied by the Coastal Commission, but still exceeds the 2006 BW Project, which was presented as fully supporting all project goals. As presented at the 2006 pre-development workshop², the BW Project had four two-story office buildings totaling 155,000 s/f and Wellness Center consisting of 36 one- and two-story apartment and condominium housing units for an unspecified number of residents plus associated common areas and commercial uses.

Although the community expressed concern in 2006 at the large scale of development, the north parcel office park was subsequently increased to three stories and 225,000 s/f, and a separate 20,000 s/f commercial building was added to the south parcel. That brought the total 2010 BW Project commercial space from 155,000 to 245,000 s/f. It would seem no hardship to scale back the Office Park, and the rental commercial space now located on the first floor of the Wellness Center, to the 155,000-s/f level of the 2006 proposal, which met all project goals. Many of the concerns in this letter could be reduced if this were the preferred alternative.

Reduce building height: The revised NPA Project 36.5-foot building height (reduced from 38 feet in last summer’s version) is still out of scale with adjacent development and would dramatically alter the local community character. The tallest existing warehouse in the immediate vicinity is 24 feet, on the north side of Pillar Ridge, a 22-acre residential

² <http://www.midcoastcommunitycouncil.org/storage/issues/bigwave/2006-06-BW-pre-app-wkshop.pdf>

community of single-story manufactured homes. A more appropriate building height limit in this neighborhood would be 28 feet. Other comparisons of scale are the only other buildings on Airport St., otherwise surrounded by preserved open space and airport fields:

- Warehouse, 850 Airport: 2 stories, 24' tall
- Warehouse, 860 Airport: 2 stories, 23' tall
- Warehouse, 333 Airport at Stanford: 22' at Airport frontage, sloping up to 30' at the narrow back edge (height verified on building permit BLD98-0691)
- Pillar Ridge community center, next to the bluff: 17' on 6' elevated hillside, total 23'

The vast majority of development in Princeton is one and two-story. A key theme identified in the Plan Princeton Community Visioning Report (October 2013, p.1-3) is to preserve the area's existing character -- its small scale, and its natural environment. "Many people want to see Princeton retain and enhance what makes it special today and to limit the height, bulk, and mass of new development." The Plan Princeton Existing Conditions Report (May 2014, p.4-50) states, "Large-scale hotel development along Capistrano Road should not be used to represent community character."

Visual simulations have not been updated for the revised NPA Project. The community prefers story poles for the perimeter of the tightly grouped buildings, with the standard wide strip of orange webbing at the maximum building height so that it is visible from all the viewpoints analyzed in the EIR. Story poles for the previous project only had a thin strip of tape that could not be seen from any of the viewpoints except Airport St. It is important for the community at large to see an accurate real life depiction of the height and mass of the proposed development.

TRAFFIC

Jobs/Housing Imbalance: The potential for many new high-paying local jobs at the BW Office Park is touted as helping to address the Coastside housing/jobs imbalance. San Mateo County has a jobs/housing imbalance, which leads to long commute distances from outlying bedroom communities of which the Coastside is an example. A useful solution is more housing near Bayside jobs and transit corridors to reduce vehicle miles traveled and greenhouse gas emissions. The reverse housing/jobs imbalance of the Coastside (particularly for high paying jobs) is a symptom of the countywide problem. Adding non-coastal-related jobs on the Coastside would only increase pressure for more Coastside housing, infrastructure expansion, and traffic congestion from sources unrelated to Coastal Act priority uses. The county's jobs/housing imbalance will not be helped, since existing jobs over the hill would still need to be filled and those workers would have to live somewhere. The EIR Addendum does not acknowledge this.

Reverse Commute: The Traffic Analysis proposes that the BW "reverse commute" would not impact peak hour traffic on Highway 1, but does not consider all the unsignalized intersections up and down the highway where vehicles must wait for a break in traffic to turn onto the highway. Reverse commute traffic will make it more difficult to turn onto the highway due to smaller and fewer gaps in traffic. That may trigger the need for more signals along the highway, which will add to congestion. The EIR Addendum does not respond to this issue.

Inadequate/Indirect Access: The BW site lacks direct access to major roads, which should be a main ingredient for a business park of this scale. The site is hard to find,

even if its size will make it clearly visible from Highway 1. The southern route through Princeton is tortuously indirect, via Capistrano to Prospect to Broadway to California to Cornell to Airport. The northern route via Cypress to Airport is an easily-missed narrow rural/residential road, leading to residential neighborhoods and coastal visitor destinations. The project would flood these narrow secondary marine industrial, residential, and visitor-serving streets with through traffic totally unrelated to Coastal Act priority uses.

Emergency Access: Two chokepoints, Cypress in the north and Prospect in the south, provide the only access to all the area between San Vicente and Denniston Creeks, namely industrial and visitor-serving Princeton, the Pillar Ridge and Seal Cove residential neighborhoods, coastal recreation destinations of Mavericks and Seal Cove beaches, Pillar Point Bluff, CA Coastal Trail, Moss Beach Distillery, and the Big Wave site. These narrow chokepoints, constrained by raised median and curbs on Capistrano, and deep roadside drainage ditches on Cypress, are critical for emergency vehicle access and tsunami evacuation routes. Traffic backing up on Capistrano and Prospect would, for example, delay fire engines from reaching a home burning in Pillar Ridge. LOS degradation acceptable at other locations could be a matter of life and death at these chokepoints. The existing road access was never designed for such large-scale development.

Cypress & Highway 1: The Traffic Report states the NPA will generate 1,479 daily vehicle trips, and will meet the peak hour signal warrant requirement for signalization (or roundabout) at Cypress & Highway 1. LCP Policy 2.52 requires that traffic mitigation measures be installed as part of the project prior to occupancy. Staff proposed mitigation is inadequate because it would leave installation of intersection improvements until a date uncertain pending some undetermined future signal warrant study after building occupancy.

Vehicle trip projections are based on a completely arbitrary and non-binding apportionment of business park uses that generate significantly fewer vehicle trips and parking space requirements than office space does. This dubious approach was taken with the 2010 BW Project after it ran up against the parking requirements for the desired highest value office use. It is unrealistic to expect ongoing compliance with the admittedly arbitrary allotment, or effective County oversight of business park uses and resulting traffic impacts, which may therefore be drastically underestimated for the actual built-out project. It appears the arbitrary number of allotted parking spaces (currently 554) will forever after be expected to reverse-engineer the allowed uses, occupancy and ultimate total square footage for the project. Is there any legal precedent for this approach or expectation that it could or would actually be enforced?

Project trip estimates assume the 50 residents would not generate any trips. Surely they will have visitors and these numbers should be included.

Pedestrian and Bicycle Safety: The Traffic Report notes Cypress at San Vicente Creek is only 20 feet wide, and that bicycles need to take the lane, but ignores that pedestrians also must walk in the roadway on this section, and that the lower grade in the creek area limits sight distance. The entire Class 3 bike route from Capistrano through Princeton, and on Airport and Cypress requires bicycles to share the road, and due to the narrow width, vehicles need to use the oncoming lane in order to safely pass bicycles. One

section of multi-modal trail fronting the project would not adequately mitigate the increased pedestrian and bicycle hazards of dramatically increased traffic on the rest of Airport and Cypress and through Princeton.

Airport St. at Culvert: Project plans show the addition of K-rail and rows of yellow crash attenuator barrels on both sides of Airport St. at the narrow culvert section between the BW north and south parcels. Rather than adding traffic hazards and visual blight to accommodate the multi-modal trail, it would be preferable to install an 8-foot-wide bridge across the small stream similar to the ones recently used for crossings of environmentally sensitive habitat areas on the Naomi Patridge Trail in Half Moon Bay.

PARKING - The revised NPA appears to expand the parking lot an additional 100 ft into the riparian buffer. This seems a poor and unnecessary trade-off for the parking lot reconfiguration.

LANDSCAPE PLAN

LCP Policy 8.16 encourages landscape plantings common to the area. While the landscape plant palette has been revised, it still contains some non-natives or plants that won't do well in the site conditions. We suggest the following changes:

1. Create more planting space near the front of the buildings to allow for tree planting in scale with the buildings, as this will best serve to visually anchor them in the setting, as well as help screen them without blocking scenic views. The planned espaliered fruit trees will be very much out of scale next to 36-foot-tall buildings.
2. Add some Monterey cypress trees (the typical tree for Princeton), as individual specimen trees, not as massed screening.
3. Add Catalina ironwood (*Lyonothamnus floribundus* – seen at the harbor) instead of flowering plum or Japanese maple.
4. Add California wax myrtle (*Myrica californica* – upright evergreen screening) instead of Dodonea.
5. Add Ceanothus 'Ray Hartman' instead of Crape myrtle.
6. Please no berry vines (all are invasive) on or near the north perimeter fence that belongs to Pillar Ridge. #4 & 5 would be good there.

AGRICULTURE

LCP Policy 5.2, Designation of Prime Agricultural Lands, requires the County to designate any parcel that contains prime agricultural lands as Agriculture on the LCP Land Use Plan Map. The County adopted this policy in 2011 and the Coastal Commission certified it in 2012. The BW parcels consist entirely of prime agricultural land and sensitive habitat, yet nothing was done to change the land use designation from industrial to agriculture while there was no project pending. The north parcel has been intensively farmed since 2005 with high value, organic, hand-harvested, locally sold vegetables. This will be lost forever if this project is built.

DEVELOPMENT AGREEMENT

The proposed 15-year phasing plan with Development Agreement is a one-sided benefit for the developer that cannot be justified and would set an unwanted precedent for the County. There needs to be significant public benefit in exchange for the special entitlement of such an extended freeze of existing zoning regulations.

Thank you for the opportunity to comment.

MIDCOAST COMMUNITY COUNCIL
s/Lisa Ketcham, Chair

Revised Big Wave North Parcel Alternative:
The footprint of each building would fill an entire block in Princeton.

