

Midcoast Community Council

*An elected Advisory Council to the San Mateo County Board of Supervisors
representing Montara, Moss Beach, El Granada, Princeton, and Miramar*
P.O. Box 248, Moss Beach, CA 94038-0248 - www.MidcoastCommunityCouncil.org

Lisa Ketcham **Dave Olson** **Chris Johnson** **Laura Stein** **Erin Deinzer** **Dan Haggerty** **Joel Janoe**
Chair Vice-Chair Secretary Treasurer

Date: August 27, 2014

To: Camille Leung, Project Planner

Cc: SMC Planning Commission
Supervisor Don Horsley
Coastal Commission staff: Nancy Cave, Renée Ananda

Subject: **Big Wave North Parcel Alternative (PLN2013-00451) and
Addendum to Big Wave Environmental Impact Report**

The Midcoast Community Council (MCC) has held four public meetings¹ on the Big Wave (BW) North Parcel Alternative (NPA) to receive applicant and County presentations and community input. We submitted initial comments on the March 2014 project referral, and now submit these additional comments and questions on the July 2014 NPA Project and EIR Addendum.

PROJECT DESCRIPTION

The project description needs to be clear, but even now, nine years after the Wellness Center was added to the previously proposed major commercial development for the Big Wave site,² the plans remain in flux, with details out-of-date, in error, or lacking, as noted throughout this letter.

- At Coastside Design Review on 7/10/14 when committee members objected to the landscape screening as demonstrated with simulation drawings, they were told the landscaping wouldn't actually look like that. Yet the landscape plan and the visual simulations were unchanged when presented to MCC on 8/13/14.
- Site description (p.3) describes the adjacent Pillar Point Marsh as salt marsh habitat. The 23-acre portion of the marsh adjacent to the Big Wave site is fresh water marsh.
- BW Farming products would be used on-site or sold to Office Park employees only, but BW Transportation would transport food and produce to market (p.9-10).

Speculative development of the Office Park is not planned, and no interested buyers or tenants have come forward since the project was introduced to the public in 2006. The building plans are just ciphers for what some future tenant might want. Even the Wellness Center plans are only conceptual. Actual configuration would depend on demand (p.8).

¹ 11/13/13, 4/9/14, 8/13/14, 8/27/14

² "PLN 2002-00288: Grading Permit for 44,000 cy of fill for a proposed 10 acre development (unspecified storage, boat yard and commercial bldgs) on a 14 acre parcel. The applicant stated during the meeting that this proposed plan was for a major Commercial Development in the M-1 zoning, however, they were unable to obtain water for that project which has since been canceled. Currently, the applicant is undecided on a final proposal for the site and is only going to use it for storage." (8/28/02 MCC letter to Planning)

The Wellness Center project description is permanent low-income housing for special needs adults, a goal that clearly has community support, in spite of this challenging location. Loosely calling this housing a sanitarium, that technically lacks any dwelling units, is said to avoid the M-1 industrial zoning restrictions and LCP Policy 1.23 on new housing limits. Given the new phasing plan showing Wellness Center to be developed first, and uncertainty about tenants for the Office Park, what assurance is there that a significant portion of the 50 residents will be from our local area and will indeed be able to afford to live there on their SSI income as the project promises?

PROJECT SCALE

The reduced NPA Office Park scale (189,000 s/f) is an improvement, but still exceeds the 2006 BW Project, which was presented as fully supporting all project goals. As presented at the 2006 pre-development workshop, 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 to the 155,000 s/f level of the 2006 proposal.

NPA development density on the north parcel is relatively unchanged from the 2010 project denied by the Coastal Commission. Benefit from this alternative is dependent on protection of the south parcel from future development and restoration of those wetlands. The project description states that only the south parcel's Lot 2 would remain undeveloped, but there is no mention of how that would be enforced in perpetuity, such as a conservation easement.

The square footage of the Wellness Center in the NPA Project is described as 70,500 s/f of building floor area, but this total does not include the ground floors of Building 2 and 3 (19,500 s/f). Clearly these floors are intended to be finished and used as pool, or storage, or anything except living space. Similar areas in the previous project were included in building totals (pool, offices, meeting rooms, BW businesses, maintenance, janitorial, storage). To leave out this square footage is comparable to not counting the square footage of the unfinished floors of the Office Park. The 19,500 s/f should be included in building totals for an accurate description of the Wellness Center of 90,000 s/f.

LCP Policy 3.13 Maintenance of Community Character – compatible in scale, size, and design, with housing height limited to two stories.

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

The NPA Project 38-foot building height is out of scale with adjacent development and will 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 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. Upcoming zoning changes may include lowering the Waterfront building height limit from 36 to 28 feet, as was already done for the area east of Denniston Creek.

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."

Story Poles should be required for the perimeter of the tightly grouped buildings, and the standard wide strip of orange webbing should be used at the maximum building height so that it is visible from all the viewpoints analyzed in the EIR. As the project engineer told the Coastside Design Review Committee on 7/10/14, the visual simulations are not all reliable. 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 (VMT) and greenhouse gas emissions. The reverse housing/jobs imbalance of the Coastside (particularly for high paying jobs) is a symptom of the countywide problem. To add non-coastal-related jobs on the Coastside will not help the county's jobs/housing imbalance, nor reduce VMT and greenhouse gas emissions. It will only increase pressure for more Coastside housing, infrastructure expansion, and traffic congestion from sources unrelated to Coastal Act priority uses.

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. Comparison of BW 2007 and 2014 traffic analyses shows peak hour LOS degradation of Cypress eastbound to northbound turn movement due to increased highway traffic alone (C/D then, E/F now).

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 that NPA office space reduction results in fewer project vehicle trips (from 2,123 to 1,479 daily trips), but still meets peak hour signal warrant requirements for signalization (or roundabout) at Cypress & Highway 1. Proposed mitigation is a warrant study **upon occupancy** of each Office Park building until the signal warrant is met, at which time applicant shall be responsible for Caltrans approvals, CEQA requirements, all permits, and installation of intersection improvements. That process could take years and would not begin until after the signal warrant is met. LCP Policy 2.52 requires that traffic mitigation measures be installed as part of the project prior to occupancy.

- We are told the signal warrant is close to being triggered at Cypress. What is the additional number of vehicles that would trigger the signal warrant?
- Could the local desperation measure of turning left by turning “right/left/left/left/right” have skewed peak hour traffic counts?
- Does the Traffic Analysis take into account that due to constraints of deep roadside drainage ditches, no more than two vehicles can queue at Cypress before the right turn space is blocked?

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. 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.

Currently undesignated uses of the ground floors of all buildings except #1 and #4 could be additional parking, which would then allow more intensive building occupancy and increased traffic.

Project trip estimates assume the 50 residents would not generate any trips. Surely they will have visitors. Even though they don't drive, they will have to be driven everywhere they need to go, by staff, family, or friends.

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. It should be noted that the width of the entire Class 3 bike route from Capistrano through Princeton, on Airport and Cypress requires bicycles to share the road. Vehicles need to use the oncoming lane in order to safely pass bicycles. One section of multi-modal trail fronting the project will 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 AND SITE ACCESS (p.10-11)

- Which section of north parcel parking is planned for public beach spaces?
- How will the proposed BW Transportation event parking fees avoid impacting public beach parking spaces?
- The 20 parking spaces alongside Buildings 2, 4, B, C, and E show no road access, which would use up much of the inner courtyard area which otherwise might have been assumed to be landscaped with outdoor gathering places for residents and business park workers. The last-minute placement of these parking spaces occurred due to the need to move them out of the wetland buffer on the south parcel. Beach parking located on the south parcel would provide the most public access benefit.
- The parking plan does not provide planting space for many of the 24-inch-box trees in the landscape plan. To help break up the large expanse of pavement we would like to see a planting island within/along the length of the middle row of parking spaces.
- South parcel beach parking layout has the multi-modal Coastal Trail routed away from the street around the parking lot with a dead end at private property line at south end without access back to Airport St. A 4-foot-wide landscape buffer is required between parking lot and street. We suggest the following arrangement: street, landscape buffer, trail, parking. This would reduce the detour for trail users and allow trail connection to Airport St. on the south end. It would best screen the parking and separate the trail from traffic.
- The proposed trail extension on the NW property line (bordering Pillar Ridge community) for future linkage to County Park leads only to Pillar Point Marsh, private property, and to a steep landslide area unsuitable for bluff access. It is not advisable to lead the public to this secluded, unmonitored, sensitive habitat area.

WATER USE (LCP Policy 1.19 Adequate Public Services and Infrastructure)

Estimated domestic water usage for the 2010 BW Project was 26,000 gallons per day (gpd). The applicant estimates the NPA will require 9,765 gpd, which is a reduction of 16,235 gpd, or 62%. The NPA Project reduces total commercial square footage by 56,000 s/f, or 23% (245,000 down to 189,000 s/f), but does not reduce the number of residents and staff in the Wellness Center.

- What is the explanation for this dramatic reduction in water use estimates from the prior project?
- What will happen if water use estimates are unrealistically low and the project ends up using more than the 10,560 gpd that MWSD has available to supply?

The Daily Flow Analysis assumes significantly below average water use by the residents. The Wellness Center has no allocation for janitorial uses or business operations, such as drop-off commercial laundry services for Office Park workers, or the expanded use of the cafeteria for the Office Park. The Office Park has no allocation for lunchrooms, research and manufacturing uses, or shower facilities for bicycle commuters (a condition of the 2010 project).

The proposed no-chlorine salt-water pool on the ground floor of Building #3 is said to eliminate the need for showers in the pool area.

- Won't people want to wash off the salt water?
- Won't they be encouraged to shower before entering the pool?
- Won't having a heated pool with purposefully limited ventilation (to prevent evaporation and conserve water) underneath the living quarters allow the constant moisture to permeate the building?
- Will the 200,000 gal fire-flow storage tank be filled with MWSD water as stated on p.15, or from the agricultural well as stated on p.4?
- Is the swimming pool intended to double as fire-flow storage tank?

LANDSCAPE PLAN & WETLANDS RESTORATION

The phasing plan calls for north parcel permanent wetland habitat fencing in Phase 1, and north parcel wetland restoration in Phase 4, up to 15 years later. Restoration, especially weed control, will need to occur immediately upon cessation of active farming to prevent further degradation of the natural area by the proliferation of invasive weeds due to neglect after soil disturbance. This includes the adjacent strip of County Parks' Pillar Point Marsh which has been disturbed by farming and whose boundary is to be permanently marked to prevent further incursion.

The wetlands restoration plan is unnecessarily elaborate and complex, including extensive grading and intensive planting. A more realistic and modest restoration plan could be accomplished with the farmer's last tractor pass, followed by a simple planting of the locally native coastal scrub and wetlands plant species that were displaced when the farming operation began in 2005. This would be preferable to postponing the restoration up to 15 years or longer due to prohibitive expense.

The landscape and restoration plan was designed for the 2010 BW Project which proposed to recycle all wastewater, and which required extensive year-round irrigation in order to dispose of all that water. The NPA Project connects to the sanitary sewer system and would not have all that recycled water. Although the onsite agricultural well is

available for landscape water, conservation should be practiced because this well draws from the same limited aquifer as the local drinking water supply, particularly Pillar Ridge and airport wells. From a water-use perspective, the plant list and procedures should be revised due to this significant project revision.

LCP Policy 8.16 encourages landscape plantings common to the area. The landscape and restoration plan would add over 2,000 trees to a 19-acre site that never had any trees, transforming rather than restoring the site. Tree species were chosen that would grow to hide 50-foot-tall buildings, with no thought that the trees themselves, due to their size and placement, would then block public coastal views. A smoother transition from the adjacent natural areas to the development would be to cluster the trees around the buildings, and use shrubs to screen the parking lots. In that way, views of the bluff and Pillar Point, which give the area its sense of place, would not be completely blocked by dense tree plantings around the parcel perimeter.

The tree species in the plan may be unsuitable for the site's extreme marine influence, heavy impermeable soil, and cramped parking lot islands. None have been tested locally in these difficult conditions. Water-seeking alders should not be planted within 100 feet of the clay-tile sewer line on the property line with Pillar Ridge. Consider the Pillar Ridge homes that will be left in the shade by tall trees along this property line.

EECAP Development Checklist - 1.4, Tree planting to shade homes.

In this foggy marine-influenced environment, no one has air conditioning, and many use their heaters year round, at least to warm the house on a foggy morning. Sunshine is a premium in this location for its psychological and warming benefits, whereas shade is not needed or desired for cooling.

SIGNAGE

Signage added by staff high on the sides of the 36-foot-tall buildings only compounds the scenic injury of this massive development and defeats the purpose of the landscape and design efforts to help the buildings blend with their surroundings. We prefer instead low signs at the site entrance on Airport St.

GRADING

Grading permit for 21,400 cy of imported gravel is planned to raise the developed site grade one to two feet, or to three feet as stated at 8/13/14 MCC presentation.

- The grading plan doesn't specify how the soil in landscaped areas within the developed site will be brought up to the new grade level.
- The grading plan shows walkways centered between the buildings, a concept that pre-dates the addition of 20 extra parking spaces in that area without road access.
- Will the existing gentle slope of the site be maintained, or will the entire developed site be raised to one level?
- The grading plan doesn't show how the new fill level will be blended down to the remaining existing grade around the edge of the developed area.
- Will there be only one benchmark to measure building height above existing grade?

AIRPORT HAZARDS

The potential for aircraft hazard due to project-related wind tunnel effect has been brushed aside with the claim that Pillar Point Bluff blocks prevailing winds from the west (DEIR page IV.G-25). Winds don't get blocked – they get diverted, making direction and force variable and unpredictable which is the real concern. Pillar Point Bluff does indeed disrupt prevailing wind direction, resulting in strong winds from either north or south. A group of tall buildings separated by narrow canyons near the runway introduces a whole new variable for pilots.

The analysis of aircraft noise impacts neglects the considerable effect of reflected noise off tall buildings and the increased decibels that residents of Pillar Ridge will have to endure. Multiple reflections of aircraft take-off noise will increase sound intensity as the listener hears the direct sound along with all of the multiple reflections as the plane proceeds down the runway at full power on takeoff. 80% of takeoffs originate directly across the street from the proposed Big Wave Office Park.

DEVELOPMENT AGREEMENT

The proposed 15-year phasing plan with Development Agreement is a one-sided benefit for the developer that cannot be justified and may set an unwanted precedent. There needs to be significant public benefit in exchange for the special entitlement of such an extended freeze of existing zoning regulations. Freezing zoning regulations benefits developers but is a detriment to the community. The County is already more than generous with its policy of freezing zoning regulations for a project as early as when the "application is deemed complete", and liberally grants permit extensions.

The previous massive Midcoast development was Harbor Village, approved in 1989, with a ten-year Development Agreement, but not built until 15 to 19 years later under new ownership and after permit modification to allow for condominium subdivision in order to obtain financing. By the time the project was built, the design was dated and area building height limits had been reduced, but the construction went forward with the 1980's standards, to the detriment of the community.

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 has not updated the map per LCP policy certified in 2012, and the site remains designated General Industrial. The fact remains that the USDA Natural Resources Conservation Service has mapped the BW north parcel as prime agricultural soil.³ A prime opportunity was missed to correct this land use designation before the NPA Project was submitted in 2013. Does the County have a timeframe for complying with this LCP policy?

Thank you for the opportunity to comment.
MIDCOAST COMMUNITY COUNCIL
s/Lisa Ketcham, Chair

³ Denison clay loam, nearly level (1961)