MidCoast Community Council P.O. Box 64 Moss Beach, CA 94038 Serving 12,000 residents

October 19, 1998

Mr. Dave Holbrook San Mateo Planning and Building Division 455 County Center Redwood Center Redwood City, CA 94063

Re: Please add this to the Mirada Surf Draft EIR Response submitted by the Midcoast Community Council.

Dear Mr. Holbrook,

In comparing the Mirada Surf EIR Scoping Document and Response to Mirada Surf EIR Notice of Preparation from the MCC Planning and Zoning Committee to the DEIR completed by EIP Associates, the following issues and questions need to be addressed:

- Why is "Health" not addressed as an individual study topic?
 Although issues related to health are noted in other study topics i.e. Air Quality, Noise etc., this doesn't allow for the study of the cumulative impacts of the project on health, as requested by the Scoping Document.
- What are the comprehensive and specific cumulative health and public safety impacts of this project?
- Specifically, what is the assessment of health risks related to project activities and impacts?
- What is the general assessment of noise impacts on those with medical conditions?
- What is the cumulative impacts on health, asthma and allergies due to air pollution, dust and potential allergens?
- What is the potential noise impact on persons with health problems?

1. Air Quality (Section 3.9, DEIR)

Please See:

Pg. 3.9-8 (line 14) "In summary, the Bay Area is not in attainment for ozone under federal and state standards, and not in attainment of state Pm10 standards."

Pg. 3.9-2 notes, under Federal and State, "such upper limits or "ambient air quality standards" are designed to protect segments of the population most susceptible to the pollutants' adverse effects (e.g., the very young, the elderly, people weak from illness or disease, or persons doing heavy work or exercise)." Pg. 3.9-3, line 14) notes, "...these standards are needed to protect people with respiratory problems."

Consider the following: the Bay Area is already exceeding Air Quality Standards as noted in the DEIR, in <u>addition</u> to Impact 3.91, "Construction of the proposed project would be a source of short-term air pollutant emissions that could be a nuisance to existing land uses and have the potential to exceed ambient air quality standards."

"Fine particulate matter (i.e., PM10) is the air pollutant of greatest concern associated with construction dust, if uncontrolled, PM10 concentrations attributable to construction activities can exceed air quality standards designed to protect human health. This is a potentially significant adverse affect."

As requested by the Scoping Document (section Health)

 What specific health impact study has been done to determine the number of individuals near and adjacent to the project site who have serious health problems?

As noted in the Scoping, "this kind of survey should be designed and carried out by a contractor with established expertise in medical research and epidemiological investigation."

- Who will design the medical survey to gather such information?
- What are their credentials?
- What questions will be asked?
- Please provide copy of survey.
- What will be the process of carrying out the survey?
- What area will be surveyed?
- Who are the medical experts and their credentials that addressed environmental issues relating to health in the DEIR?
- What is the assessment of the extra cost load on health care costs from increased air pollution?
- What are the cumulative impacts on air quality from increased construction activities in Shoreview Acres (adjacent to the Mirada Surf Project), in El Granada, in addition to the current project?
- What quantitative study is being done to assess this?

See page 3.9-13: Potential construction areas on the project site are located near some existing residences and an off-site sensitive receptor, El Granada Elementary School. However, these locations are set back sufficiently such that construction dust would tend to settle out before reaching off-site residences and receptors. Significant impacts are not anticipated at off-site residences and sensitive receptors.

- What study or research was done to draw this conclusion?
- If the above noted were true, why would PM10 be considered a negative impact?
- Noise (3.10)
- What study will be done to assess the effect of cumulative noise impacts on those with medical conditions?

The Noise Survey performed is inadequate. It occurred on one weekday, when school was not in session, on a summer afternoon.

- When and how will a new noise survey be performed, including weekend days – during good weather, to accurately assess air traffic, when school is in session, and during peak rush hours?
 There are considerable noise impacts on Santiago with parents bringing their children to school.
- What are the cumulative noise impacts?
- Utilities (3.4)

Pg. 3.4-2, last paragraph: "Presently there is no surplus water supply available to serve new development." Pg. 3.4-3 (line 4)"there is no time table yet available for developing the Phase II water supply."

- It needs to be pointed out that the applicant has no water for this project. Future water availability is purely speculative.
- 15 –Acre Undeveloped (shoreline) site across Highway 1 and west of the project site to San Mateo County

This parcel is not noted on the Applicant's Project Application. Furthermore, in discussing this project with Paul Koenig and Terri Burns, on March 30, 1998, with members of the Midcoast Community Council it was reiterated that this parcel was not a part of the project.

This suddenly appears in the Planning and Building Division Staff Report of 10/15/98, Item #4. In the past this parcel has been the center of community debate (El Granada Task Force), and it is unclear why it should suddenly surface. It has the capacity to create conflict in the community.

- What assessments are on each of the pieces of property being donated to the community?
- What will be the cost to the taxpayers should we accept these donations.

For the record, I would like it noted that the original notice of the special meeting for comment on the Draft EIR was inaccurate and misleading, creating confusion and concern in the community. The Midcoast Community Council did request, of the Planning Commission, an extension of time to comment on the DEIR, due to the volume of material being handled and to afford themselves the opportunity to collect further public comment from the special meeting. This request was denied.

Sincerely,

Laura Stein Board of Directors, Midcoast Community Council Chair, Planning and Zoning Committee