

Midcoast Community Council

An elected Municipal Advisory Council to the
San Mateo County Board of Supervisors
Serving 12,000 coastal residents

Post Office Box 64

Moss Beach, CA 94038-0064

<http://www.montara.com>

4 March 1999

Council Members

Paul Perkovic, Chair

(650) 728-9500

perk@montara.com

Mary Hobbs, Vice-Chair

(650) 728-5012

mary@montara.com

Laura Stein, Secretary

(650) 712-0225

laura.mclaughlin@

worldnet.att.net

David Spiselman, Treasurer

(650) 728-1714

dave-s@coastside.net

Bill Derow

(650) 712-8185

bill@derow.com

Joe Gore

(650) 726-1550

threezero@aol.com

Ric Lohman

(650) 726-9607

blohman@coastside.net

City of Half Moon Bay
Planning Department
Attn: Bud Carney
501 Main Street
Half Moon Bay, CA 94019

re: **Comments on DEIR for Manrao Executive Inn Motel**
File No. PDP-01-98

Dear Mr. Carney:

The Midcoast Community Council (MCC) transmits the following issues, concerns, and questions that have been raised by our Planning and Zoning Committee and members of the public. We discussed this item at our meeting on 24 February 1999. The Council did not vote on each comment or question, but submits this document to assist your agency in completing the requirements under the California Environmental Quality Act (CEQA) for this project.

Standing Committees

Parks and Recreation

Mary Hobbs, Chair

Planning and Zoning

Ric Lohman, Chair

Public Works

Joe Gore, Chair

Summary of Issues:

- **Cross-Jurisdictional** – To what extent do CEQA and the Coastal Act require consideration of an adjacent jurisdiction when a project is so obviously within their realm of impact?
- **Aesthetics/Viewshed** – Visual Impact to El Granada area is greater than projected.
- **Traffic & Circulation** – Projected unincorporated area buildout patterns were not considered, projects in unincorporated area were not considered.
- **Unmitigatable Impacts** – To its credit, the DEIR does identify visual impact of the project as an unmitigatable impact that is inconsistent with Half Moon Bay Adopted Plans & Policies.

Cross-Jurisdictional

The general tone of the Draft Environmental Impact Report (DEIR) is to give light treatment of the project's impacts to and effects from the surrounding unincorporated MidCoast area, specifically the communities of El Granada and the Harbor/Princeton area. The list of referenced and contacted sources in the DEIR only list Half Moon Bay (HMB) agencies and staff – the only contact with San Mateo County was in consultation of the airport considerations.

The project is located at the extreme northern end of the HMB city limits, on a slim finger of boundary that runs along the west side of Highway 1 for almost a mile and may no longer be connected physically to Half Moon Bay. This finger fronts all of Miramar and almost the entire community of El Granada on the east side of the highway. The impacts on surrounding HMB properties in this area would exist only to those parcels immediately on either side, while thousands across the highway are not seriously considered. This is not helped by the fact that little was done to invite input from the majority of affected residents regarding this report. No request was made of the MCC or the County for input on this application

We are not clear on the implications here, on how much one jurisdiction's CEQA or Coastal Act compliance is based on consideration (or disregard) of impacts to surrounding areas of another jurisdiction. We have not had the time to research all these implications, but we feel this issue deserves serious research and consideration.

Aesthetics / Viewshed

1. DEIR Identified Impacts:

To its credit, the DEIR does identify visual impact of the project as an unmitigatable impact that is ***inconsistent with Half Moon Bay Adopted Plans & Policies***. This determination is based mainly on the visual effect from Highway 1 – the visual effect from El Granada and other locations is referenced only lightly (Page 33, second paragraph of section titled "Visibility") and not given any weight in consideration.

2. Visual Impact from El Granada:

The project will be clearly visible along Avenue Alhambra from the intersection of The Alameda to Obispo Road, roughly half a mile. As the land slopes upward in the inland direction, it will certainly be visible to many of the residences inland from Avenue Alhambra. The DEIR refers to "trees and other vegetation" that obscures the view from El Granada – a drive along Avenue Alhambra showed no such vegetation of any sort obscuring a view of the project.

3. Visual Impact from Coastal Trail, Harbor areas and other waterfront sites:

Visual effect from the coastal trail, which runs immediately behind the project, is also neglected. Plans in the DEIR show a rear setback somewhat further in from that of the Beach House and the Anchorage restaurant – but this placement would still create the effect of a wall on the inland side of the trail along these three developments and continuing on to the RV Park to the south. There is a substantial difference in aesthetic between walking along a grassy slope and walking along a grassy slope with two floors of hotel balconies atop it.

Current spacing of structures allows at least some breakup of the initial structure-line when viewed from more distant waterfront areas (West Princeton, Pillar Point Harbor, Half Moon Bay State Beaches). Even with the out-of-scale Beach House, there is at least some interval of natural bluff line visible. The project would present almost a solid wall of bluff-top structure from the RV Park to the south to the Anchorage/Highway 1 Diner on the north.

4. Viewing Area as Mitigation:

The small fenced-in area offered as mitigation is hopelessly inadequate. No tourists would drive into a parking lot to stand beside a two-story structure to peer at the ocean through a fence. Planting trees and bushes around the structure as proposed does nothing to mitigate the view loss.

All these visual impacts should be noted in the Environmental document as further justification for a claim of unmitigatable visual impact. Since this structure totally fails to mitigate any of the loss of viewscape, the application should be denied immediately.

Traffic & Circulation Impacts

General Notes: Although it is indicated that traffic studies and counts were done at the location of the project on Highway 1, it is hard to imagine how the determination of a Level of Service (LOS) "A" was arrived at (Table 12, page 82). From personal observation, especially on warm afternoons during the week and often all day on Saturdays and Sundays, this is a particular point on the Highway where traffic can come to a complete stop. One can attribute this to the heavy use of Surfer's Beach directly to the south of the project, and traffic slowing because of vehicles turning in and out of the Beach House and the Anchorage restaurant. The applicants are claiming that the traffic light at Coronado will improve traffic conditions to the point of mitigating all traffic increases caused by their Inn. During our discussions with CalTrans, it was stated that adding lights will often have the effect of a general traffic slowdown at rush hours. The light could actually make traffic slower, not better. We comment more on this below.

Apparent non-consideration of unincorporated area development in cumulative impact:

Traffic data for the immediate future does not seem to accurately reflect assumed buildout patterns in the unincorporated area surrounding the project. When the new sewer plant comes on-line, new in-fill development in the unincorporated MidCoast area is expected to concentrate in the El Granada/Miramar area, potentially at the rate of 125 to 200 residences per year. This is expected because there is an existing adequate water supply from Coastside County Water District (CCWD). The Montara - Moss

Beach area to the north is not expected to experience this rapid in-fill, as its water supply (Citizens Utilities) is already at its maximum capacity and securing new sources is expected to take a few years. The overall effect could be as high as 1000 new single-family residences in the project area within the next 5 years, all needing access to the section of Highway between the Capistrano and Coronado intersections.

The DEIR also does not mention taking into account planned, approved, or projected large projects in the unincorporated area. Three that are immediately obvious are the Pillar Point Village Project (95 hotel rooms, 25 retail shops and a 280 seat restaurant at the Capistrano intersection), the Moss Beach Highlands Affordable Housing Project (89 apartment units and 69 market rate single-family residences 2 miles to the north), and the scheduled Half Moon Bay Airport expansion. In addition, other visitor serving development is expected in the Harbor area (as in the proposed but currently withdrawn Shore Bird Hotel, as well as future commercial development of Harbor District Lands in the area).

Inadequate consideration of driving patterns:

The traffic studies also seem to assume, in their discussion of adequate acceleration/de-acceleration areas and possible conflicts on the center turn/access lane proposed, regular driving patterns and habits, such as those seen with regular commuters or neighborhood travelers on their daily errands. A regular driver through this stretch of highway will attest that much of the traffic slow down is caused by visitors slowing down trying to figure out where to turn off for the hotel or the restaurant, or beach goers looking for a place to park. I have often driven carefully behind obviously confused visitors, slowing down and speeding up, moving into the left turn lane and then back, as they tried to find the entrance to the Anchorage parking lot.

This stretch also causes backups and stoppages as visiting drivers try to park for beach access, or seem surprised at the heavy on-shoulder activity at Surfer's Beach south of the project. All the existing development along this stretch, and much to the north and south, attracts visitors from out-of the area that are unfamiliar with the specific traffic patterns. The ones on this specific stretch (the beach, the RV Park, the Beach House Inn, the proposed Manrao Executive Inn, the two restaurants) all require cross traffic left turn access through 50 MPH traffic by visitors on unfamiliar roads often driving unwieldy vehicles.

As this development is expected to attract yet more people from out of the area, this peculiar driving situation will only be amplified. I do not get the sense the DEIR is properly analyzing the cumulative impact of any further development in this area, and that the traffic analysis should be deemed unacceptable. The fact that this structure would attract more visitors is in conflict with the statement on page 78 that this Inn would not be growth inducing.

Other Considerations:

Other options of a single story structure or turning the structure 90 degrees were not considered in this DEIR. The option of moving the parking to the bluffside was not considered. We would like further elaboration of the manager suite. No full-time residence is described in the DEIR. The drawing shows the northwest corner of the structure only a few feet from the apparent blufftop. Recent studies are showing higher environmental impacts from run-off from parking lots, etc. Those don't seem to be adequately addressed here.

We look forward to reviewing your responses to our issues, concerns, and questions in your Final EIR for this project. At that time, the Council may take a formal position in support of, or in opposition to, the final project.

Sincerely yours,



Paul Perkovic, Chair