

Midcoast Community Council

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

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24 June 1999

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

re: Comments on the Final EIR for the Manrao Executive Inn Motel

Dear Planning Commissioners:

The Midcoast Community Council (MCC) voted unanimously at our regular meeting last night, 23 June 1999, to forward these additional comments on the Manrao Executive Inn Motel project to your Commission in time for consideration before your scheduled meeting tonight, 24 June 1999. Overall, we believe that the Final Environmental Impact Report (FEIR) on this project is inadequate because it fails to thoroughly respond to the comments and concerns raised in our earlier correspondence on this project. **We recommend that your Commission not certify the FEIR in its present condition, and that your Commission also not adopt any statement of overriding considerations for this project at this time.** Paragraph numbers below refer to the numbered responses in the FEIR to our original set of MCC comments.

Standing Committees

Parks and Recreation

Mary Hobbs, Chair

Planning and Zoning

Ric Lohman, Chair

Public Works

Joe Gore, Chair

B-1

Our comments in this section addressed the overall problem of procedure. The applicant apparently was able to meet the minimum legal posting and notification process. Since 99% of the impact of this project is in the unincorporated County, we would have expected additional notice and discussion. The Draft Environmental Impact Report (DEIR) was not sent to the Midcoast Community Council, it was picked up by a member of the MCC at the architect's house. The original deadline for submission of comments had to be moved back since there was insufficient time to convene a meeting of the MCC or its Planning and Zoning Committee.

B-2

Comments related to B-2 are the crux of the problem. Our letter stated that the permanent loss of viewshed was not adequately addressed. The DEIR itself clearly states that the project does not conform to "City and Coastal Act policies ..." We feel the importance of this is understated. The FEIR continues to downplay this basic failure of the project.

B-3&4

Text was added to meet these deficiencies. Thank you for your response.

B-5

Reference to DEIR page 20. The DEIR states that the viewing area meets Coastal Act criteria for providing visual access to the ocean. This statement is unacceptable. This issue is environmental, not just a project issue, as the response to our letter attempts to say.

B-6

Apparently, comments in the EIR indicate that current traffic is ignored in the calculations of total traffic load. This seems to defeat the entire purpose of the study. Obviously the proposed motel, by itself, does not shut down Hwy 1. The tables ignore the total stoppages that occur on weekends and rush hours. At times when traffic is at level of service "E", motel traffic can cause it to worsen to level of service "F". The study only addresses traffic at intersections. It fails the basic requirement of analyzing the cumulative effects on total traffic. In front of the hotel the study only addresses the effect on traffic leaving the hotel, not all the traffic on Hwy 1. Comment G-2 states there will be a wait of 5 minutes for a car leaving the hotel. How can that be construed as level of service "A"? As local residents, we see first-hand the total stoppages on the weekends and rush hours. Why does the FEIR continue to fail to address this?

B-7

Three additional major projects were added to the traffic section in the FEIR. The potential expansion in normal housing is still ignored. This continuing, annual residential development (limited to 125 or 200 building permits per year by the Local Coastal Program) is not a single project, but the known planned growth is still ignored. Our letter requested that the FEIR also study the large population increases due to the opening up of sewer and water connections. This was not done. Most of the traffic intersections studied are not in Half Moon Bay (HMB) proper. County standards should therefore apply.

B-8

The response does not address our comment. All activities are growth inducing. Every project contributes proportionally to size. One cannot say this project contributes nothing to growth. Long range cumulative effects of traffic are not addressed. Any additional traffic has cumulative effects, which must be studied.

B-9

Drainage is described in the DEIR as going to an existing culvert on the East side of Hwy 1, somehow crossing the highway. (This may be an inaccuracy that remains uncorrected in the FEIR, as a field visit reveals that there is an existing drainage ditch with several culverts on the west side of Hwy 1, eventually discharging into the ocean.) As stated in our letter, the DEIR does not address the increase in chemicals entering the ecosystems from increased asphalt and concrete coverage of lot. Studies have shown that chemical runoff is more dangerous than previously thought. No mention is made of dangerous chemicals in the added runoff. The chemical drainage is directly into Pillar Point Harbor, whereas the study only deals with physical drainage.

SIGNIFICANT ADDITIONAL INFORMATION:

The FEIR should address the new Half Moon Bay Airport Master Plan and airspace protection overlays. The cumulative number of people already in this area on a big weekend will already exceed the limit of people/acre. This project will add even more people to the area. This FEIR cannot be certified until these airport numbers are studied.

Sincerely yours,

Paul Perkovic, Chair