

# 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](http://www.MidcoastCommunityCouncil.org)

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Date: January 12, 2015

To: San Mateo County Planning Commission

Cc: SMC Board of Supervisors  
Steve Monowitz, Acting Community Development Director  
Camille Leung, Project Planner  
Coastal Commission staff: Nancy Cave, Jeannine Manna

Subject: **Big Wave (BW) North Parcel Alternative (NPA) - PLN2013-00451**

The Midcoast Community Council (MCC) has held seven public meetings<sup>1</sup> on the Big Wave (BW) North Parcel Alternative (NPA) to receive applicant and County presentations and community input, and to approve comments<sup>2</sup> on the evolving project description and plans. While a number of our previous questions and concerns have been addressed, there still remain significant concerns with visual and traffic impacts and lack of clear project detail.

## **PROJECT DENSITY AND SCALE**

The development density on the north parcel is actually increased from the project denied by the Coastal Commission in 2012 (225,000 s/f then, 259,500 s/f now). The current lack of proposed development on the south parcel is touted as a reduction in total density of the BW Project. In fact, there is nothing to prevent development of the south parcel as a separate project. Without permanent development restriction for the south parcel, there is no actual reduced density in the BW Project.

Since the BW Project was first presented to the community in 2006<sup>3</sup>, various numbers for office/commercial/industrial square footage have been put forward as meeting project goals, from 155,000 up to 245,000 and back down to 189,000, with no apparent rationale other than pumping up the numbers to make room for later compromise.

MCC agrees with the Coastside Design Review Committee that the project is fundamentally out of scale and out of character with the Princeton community. The staff Report (p. 17-18) compares building square footage of the 4- and 8-building versions, rather than to the surrounding neighborhood. The average NPA building size is stated as 32,500 s/f with the Wellness Center Building #3 being the largest, at 47,000 s/f. Compare to 10,871 s/f for one of the largest Princeton warehouses, Twice as Nice<sup>4</sup>. The vast majority of development in Princeton is one and two-story.

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<sup>1</sup> Meetings: 11/13/13, 4/9/14, 8/13/14, 8/27/14, 11/10/14, 12/10/14, 1/12/15

<sup>2</sup> Letters: 4/9/14, 8/13/14, 11/10/14, 12/10/14

<sup>3</sup> <http://www.midcoastcommunitycouncil.org/storage/issues/bigwave/2006-06-BW-pre-app-wkshop.pdf>

<sup>4</sup> County online permit site, BLD1990-1112

The Community Design Manual requires: “Structures should relate in size and scale to adjacent buildings and to the neighborhood in which they are located.” In the west-of-Airport neighborhood of the BW Project, the tallest existing warehouse is 24 feet, on the north side of Pillar Ridge, a 22-acre residential community of single-story manufactured homes. Other comparisons of scale are the only other buildings on Airport St., otherwise surrounded by preserved open space and airport fields:

- Warehouses north of project, 850 & 860 Airport: 2 stories, 24’ tall
- Warehouse south of project, 333 Airport: 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’

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.” In any case, the hotel development is three quarters of a mile away from the NPA Project, in a different neighborhood.

Project visual simulations are inadequate and have not been updated for the revised NPA Project and landscape plan. The community needs story poles to correctly visualize this project. Story poles should show 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. It is important for the community at large to see an accurate real life depiction of the height and mass of the proposed development.

## **HAZARDS AND DRAINAGE**

The EIR Addendum has not evaluated the hazards of locating the BW residential component immediately adjacent to a bulk propane storage facility. Each project revision has brought the housing closer to this hazard. In addition to the potential for deadly explosion, the Fire Marshall can attest to the numerous complaints of noxious smells from the practice of “out gassing” the tanks. A new addition to the grading plan proposes a 4-foot-high propane deflection wall along the adjoining property line, which would direct the downhill flow of leaking heavier-than-air LPG away from the BW parcel, directing it instead toward Pillar Ridge homes to the west. By attempting to protect the BW housing, the propane hazard would be shifted to the residents of Pillar Ridge. This is not acceptable, and would constitute a significant unmitigated impact under CEQA.

## **TRAFFIC AND COASTAL ACCESS**

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. The southern route through Princeton goes through numerous turns and intersections, 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 and LCP 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. Intersection level of service degradation acceptable at other locations could be a matter of life and death at these chokepoints. The existing access roads were not designed to handle such large-scale development.

Pedestrian and Bicycle Safety: One section of multi-modal trail fronting the project would not adequately mitigate the increased pedestrian and bicycle hazards of 1,500 daily project vehicle trips. 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 right of way, vehicles need to use the oncoming lane in order to safely pass bicycles. On Airport St, there is no room for bicycles on the west-side sidewalks in the existing developed section. The preferred location for a Class 1 bike trail is on the east side of Airport St, which avoids all intersecting driveways and streets. At the creek crossings on Airport and Cypress, pedestrians also must walk in the paved travel lane. The pedestrian danger on Cypress is increased due to the limited sight distance in the creek area. At the Airport St. culvert, rather than adding traffic hazards and visual blight of K-rails and rows of yellow crash attenuator barrels 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.

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. Recommended Finding 2.m states, "The adopted mitigation measure addressing improvement of the Capistrano Road and Highway 1 intersection is still necessary." Presumably this should refer to Cypress instead of Capistrano.

Vehicle trip projections are based on an arbitrary and non-binding apportionment of business park uses that assumes significantly fewer vehicle trips than office space would generate. 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 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.

Vehicle trip estimates in the Traffic Report should be revised to include visitors to the Wellness Center. The assumption that no visitors or family use of the Wellness Center will occur on weekdays between 7-9 AM and 3-8 PM is unrealistic, and if made a condition of approval of the project, would be unenforceable.

Reverse Commute: The Traffic Analysis proposes that the BW “reverse commute” would not impact peak hour traffic on Highway 1, but fails to consider all the unsignalized highway intersections where vehicles must wait for a break in traffic to turn onto the highway. BW 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.

Jobs/Housing Imbalance: The potential for new jobs at the BW Office Park is touted as helping to address the Coastside housing/jobs imbalance. 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 countywide 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.

## **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, and should have been re-zoned as such in accordance with the LCP.

The north parcel has been intensively farmed since 2005 with high value, hand-harvested, locally sold vegetables. Although organic farming is stated to be an important project goal, the best agricultural soil (the north parcel) would be paved over and developed as offices. The farming would be relegated to the narrow wetland buffer strips, and a small portion of the south parcel.

### **EIR ADDENDUM must be updated to reflect revised plans.**

The circulated July 2014 EIR Addendum evaluated the original 9-building NPA project. The November Final EIR Addendum and staff report described and conditioned a 4-building project with a completely different set of plans. The January 2015 staff report includes yet another completely different site plan, tentative subdivision map, floor plans, building elevations, landscape and phasing plans. It would be easier to keep track of the fast-moving evolution of this project if the same benchmark were always used – the original 9-building NPA project. Unnecessary confusion is added in the January 2015 staff report, which compares the 8-building option to the briefly considered 4-building option, which nobody wanted or had time to absorb (during the one week it was actually considered), but which is unfortunately memorialized in the Final EIR Addendum. Any reference to plans or conditions of the project in the November Final EIR Addendum is confusing at best and likely erroneous. Condition 5 (p. 60) states “property owners shall construct and maintain the project and project details, as described in the certified EIR over the life of the project...” The EIR Addendum should not be adopted unless it is updated to reflect the project and plans being considered for approval.

**PROJECT PLANS LACK NECESSARY DETAILS**

The Vesting Tentative Map for the 8-building option is lacking extensive information specifically required by the County Subdivision Regulations.

Condition 88.c calls for improving the courtyards between the buildings by enlarging and celebrating the space. On the other hand, building elevations show rollup doors facing the narrow inner “courtyards” indicating industrial alleyways may be the intended use. The site plan shows no road access to the courtyards or other indication of their intended use. There is no clear plan for the area and yet the layout and dimensions will be locked in by subdivision.

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.

Thank you for the opportunity to comment.

MIDCOAST COMMUNITY COUNCIL  
s/Dave Olson, Chair