

CALIFORNIA COASTAL COMMISSION

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January 14, 2015

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Subject: San Mateo County Coastal Development Permit (CDP) Application PLN 2013-00451 (Big Wave) Executive Summary and Supplemental Staff Report, January 14, 2015

Dear Ms. Leung:

Thank you for sending the Coastal Development Permit (CDP) Application PLN 2013-00451 Executive Summary and Supplemental Staff Report for the Big Wave 8-Building Alternative dated January 14, 2015 (Staff Report) received via email on January 8, 2015, provided by San Mateo County (County). This Staff Report has been prepared for tonight's Planning Commission hearing on the proposed project. The 8-Building Alternative includes subdivision of two parcels (APN 047-311-060 subdivided into 7 lots and APN 047-312-040 subdivided into 2 lots); construction of 5 office park buildings totaling 162,000 square feet; 3 wellness center buildings totaling 97,520 square feet and related improvements; construction of a concrete restroom and boat storage parking; and grading consisting of 736 cubic yards of cut and 16,400 cubic yards of fill. The proposed project is located on the west side of Airport Street, north of Stanford Avenue and across the street from the Half Moon Bay Airport, in the unincorporated Princeton area of San Mateo County. Based upon our preliminary review of the above referenced document, we would like to make the following comments on some of the major remaining issues. Please ensure that these comments are made available to the Planning Commission for tonight's hearing.

- 1. Size, Scale, Density and Community Character:** The Staff Report includes only a limited analysis of the proposed project's consistency with the size, scale, density and community character of the surrounding Princeton Community. In addition, the financial feasibility of the project as it relates to the size and scale has not been adequately addressed.

With respect to size, scale and density, many interested parties have raised concerns with respect to this development including the Coastside Design Review Committee (CDRC) which recommended denial of the design review permit for the proposed project, finding it fundamentally out of scale and out of character with the Princeton Community. The Staff Report and the project proponents have made a variety of assertions about the size of the project being in character with the built and natural environment of Princeton. However, to date these assertions have not been supported by the factual evidence necessary to draw such conclusions.

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As a means of evaluating such size and scale claims, Commission staff estimated the building footprint square footage of all buildings in Princeton using Google Earth Pro which revealed the following:

- 91% (357/392) of all buildings have a building footprint less than 5,000 square feet
- 6% (24/392) of all buildings have a building footprint between 5,000 and 10,000 square feet
- 1% (4/392) of all buildings have a building footprint between 10,000 and 15,000 square feet
- 1.5% (6/392) of all buildings have a building footprint greater than 15,000 square feet
- All buildings in Princeton with a building footprint square footage greater than 10,000 square feet appear to be less than 30 feet in height except for the Harbor Village (91,522 square foot building footprint) which has a maximum height of 36 feet.

The proposed project would add 2 buildings with a building footprint between 10,000 and 15,000 square feet and 6 buildings with a building footprint greater than 15,000 square feet. The total square footage of the building footprint for all proposed buildings contained in the Big Wave 8-Building Alternative would be 126,845 square feet with heights between 30 and 34 square feet (building height from existing grade). Thus, from this analysis, it appears that this would be the largest development in terms of total building footprint with heights greater than 30 feet to ever be allowed in the Princeton Community. The only development close in size and height, Harbor Village, is a visitor-serving development located in a different zoning designation, which happens to also be a Coastal Act and LCP high priority use within the coastal zone. This data would suggest that the project is out of scale and character with the Princeton area, and would suggest that changes to reduce its scale would be appropriate. We recommend that the County consider this data, and consider project modifications that can bring the project into a size and scale that is consistent with the community and the vision for it moving forward. Please see Attachments 1 and 2 for the data collected from Google Earth Pro used in the above analysis.

In addition and related, LCP Policy 1.3 recognizes that some lands, including prime agricultural soils and sensitive habitats included in the urban boundary, should not be developed at relatively high densities. In the Staff Report, the County indicates that the project is not considered to be "relatively high density" development under the LCP based on an argument that density is defined by the number of proposed dwelling units, and none of the uses (including the 57-bedroom Wellness Center) are considered to be dwelling units because they lack kitchens. We do not believe that that is the correct way to understand this policy. Instead, it is clear to us that this policy refers to density as a matter of scale in a broader sense, including with respect to density of other types of development, such as industrial uses. The Coastal Act and the LCP are clearly protective of agriculture, whether the land in question is LCP-designated for agriculture or not, and this policy is the LCP's expression of that protection. The agricultural land is not intended to simply be a blank slate within which whatever density the underlying zoning might support is automatically allowed. On the contrary, it is a constraint that affects the level of density that is appropriate, and the LCP at this location requires that the project not be relatively high density. From our analysis above, it appears that this is the most dense configuration of large buildings (in terms of building footprint square footage and height) to be proposed in the Princeton Area ever, and thus cannot be categorized as not "relatively high density" development. Again, this suggests that project modifications

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designed to limit the density (and the size and scale more generally, see above) are warranted, and we recommend that the County consider reduced scale alternatives at this site that can better achieve LCP consistency on these points.

Furthermore, the LCP protects public views and requires visual compatibility otherwise. LCP Section 6565.17 (L) requires that "The design of the structure is appropriate to the use of the property and is in harmony with the shape, size and scale of adjacent buildings in the community." As indicated above, it appears that the size, scale, and density of the proposed project is significantly larger than that found in the surrounding community. In addition, the visual aspects of the project have changed significantly, including building design, location, articulation, colors, spacing, massing and landscape screening, and we have only had limited time to review such materials. Commission staff recommends that the size, scale, and design be reevaluated for consistency with the surrounding community and public view protection. Again, it seems clear that a reduced scale project need to be considered for LCP consistency. Further, design measures to help reduce perceived scale (including breaking up the design with some areas of indent, varied rooflines, offsets, and projections that provide shadow patterns, a smaller second story set back from the first, etc.) should also be applied. In addition, as soon as the project proponent has reached a conclusion on what, exactly, they are proposing, then they need to produce a visual assessment of that project for public review, whether through a series of visual simulations or through the use of story poles and netting, or some combination, so that the interested parties can better evaluate the visual impacts of the final proposed project. The analysis provided thus far is insufficient in this regard.

Finally, it has been expressed by the Staff Report and the project proponents that this is the only scale of project that would be financially feasible. However, we are not aware of the documentation and analysis supporting such conclusion. As we previously requested, we believe it is critical that there be a clear analysis of financial feasibility for the project, including related to reduced scale alternatives that appear necessary to meet LCP requirements. Statements and conclusions lacking analysis and data are not helpful in this respect, and it does a great disservice to the public when a certain scale is considered the only starting point for evaluation based on same.

Concerns discussed above regarding the size, scale, and density of the proposed project and its consistency with surrounding development and community character have been expressed by Coastal Commission Staff, Committee for Green Foothills, and the Midcoast Community Council. In addition, the Coastside Design Review Committee recommended denial of the design review permit for the proposed project, finding it fundamentally out of scale and out of character with the Princeton Community. The analysis above quantitatively reflects that the proposed project is in fact inconsistent with the size, scale, and density of the surrounding community. We strongly recommend that the County reconsider the proposed project taking into account the above analysis and comments from the community and reduce the project to better meet the requirements of the LCP. Any such, consideration of reduced project alternatives should include evaluating reductions to the overall square footage and height of the of the project (including numbers of buildings), restricting taller structures to the area farthest away from the public road and public view, and stepping back second stories (if they are appropriate) from first stories along the street frontage, and other measures designed to ensure that any approved project is consistent with the size, scale, and character of the surrounding community.

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- 2. Project Uses and Phasing:** The length and nature of the project phasing and the undefined nature of the potential uses within the Office Park and Wellness Center business space have contributed to the overly complicated nature of this project, significant concerns expressed by the community, and extensive conditions included in the Staff Report necessary to ensure that future potential scenarios will not impact coastal resources. The County and the Applicant continue to assert that the maximum amount of development will be restricted by the total amount of approved parking and availability of public services such as water and wastewater treatment. However, the method of implementing such limitations is made complicated and difficult by the way in which the project phasing and uses have been structured. If the County continues to pursue an approval that allows project phasing and limitations based on water, sewer, and parking constraints, then the way in which the project is affected by such constraints needs to be better defined. In particular, once an appropriate overall size and scale is identified (see above discussion), then the degree to which different components can be developed and the way in which such components "use up" allowed development potential need to be clearly described. For example, if the site is developed in such a way as all of the parking, water, and/or sewer allocations are used up by something less than the number of buildings/square footage initially allowed for the overall project, then there needs to be a mechanism in the approval that then ensures that the rest of the project is no longer authorized, and that ensures that such remaining area is then restricted to open space. The Staff Report includes a condition akin to this, but it is structured to be evaluated at the end of a 15-year term. This is inappropriate. If the project uses up its level of intensity, then the restrictions on future development (including areas being changed from buildable to non-buildable open space) need to be initiated immediately instead of waiting until the end of the 15 year construction period.

Similarly, in terms of potential modifications to the project in the future, including the area of boat storage proposed for the south parcel, it is true that coastal permit amendments would be required. However, given the way in which the phasing and lack of exactness associated with the uses might play out, it is inappropriate to only rely on an amendment process to resolve such future issues. At a minimum, the permit should be conditioned so that any future potential changes are only allowed if they will not increase the size, scale, density, and intensity of use approved, will not increase coastal resource impacts, and will not otherwise lessen or avoid the intended effect of the terms and conditions of the permit.

Finally, the project phasing itself is still unclear as detailed in the Staff Report. The description of Phasing on Page 19 of the Staff Report indicates that all Wellness Center buildings will be built before the Office Park buildings. However, proposed Condition 73 and the Phasing Plan in Attachment K illustrate otherwise. Condition 73 indicates that the Office Park buildings on lots 2 and 3 can be built before the Wellness Center buildings 1 and 2. If the intent is to develop the Wellness Center component of the project first, which we believe is appropriate, then the project phasing needs to be further refined to ensure that that is the case.

- 3. Public Services:** It is still unclear that the demand on public services for the proposed project has been adequately evaluated. Page 22 of the Staff Report states, "...the traffic report in the Final Addendum adequately evaluated traffic impacts from a mix of uses, including 84,000 square feet of office plus the Wellness Center." Commission staff has reviewed the traffic report in the Final

Addendum and it appears that the estimated office use utilized in that analysis was only 64,505 square feet. In addition, the traffic report only examines intersections and does not look at the level of service for roadway segments. In further examination of other recent traffic studies conducted in the area for other proposed projects, Commission staff has found that these other studies concluded a higher level of service at intersections and on roadway segments (including the City of Half Moon Bay Highway 1 Traffic Safety Study by DKS Associates, dated December 6, 2011). The DKS report found that the intersection of Highway 1 and Highway 92 to operate at a LOS of E during Saturday midday peak hours, and LOS D during the weekday PM peak hours. The study also found that a majority of the roadway segments between Miramar Drive and Highway 92 along Highway 1 operate at LOS E during AM and PM peak hours and Saturday midday hours. This suggests that there are more severe roadway capacity constraints than what has been evaluated in the proposed project. The analysis of traffic impacts needs to clearly assess the manner in which the proposed project would affect traffic not just at intersections but along Highways 1 and 92 overall, including critically during summer peak months and weekends when coastal visitors are using these primary coastal access routes. In addition, to the degree the project results in worse traffic, these impacts need to be avoided, and/or appropriately mitigated if they can't be avoided. We note that the LCP identifies a range of potential mitigations in such cases. It does not appear that the project's traffic impacts have been fully addressed in a similar way.

4. Page 20 of the Staff Report states that the Montara Water and Sanitary District (MWSD) letter dated October 24, 2014 provides the comparative estimate data previously requested by Commission Staff. This data estimates a range of 3,000 gallons per day (gpd) for industrial uses and 8,300 gpd for institutional uses. It is not clear how many specific projects fall within those estimates. If the estimate is 3,000 gpd for one industrial use, and the project is proposing 5 new industrial uses, wouldn't the water estimate be 15,000 gpd for the office park only? Please provide clarity on this issue.

The County also discusses in the Staff Report that verification of available water to serve a project occurs during the building permit application process and if there is no water available, no building permit will be issued. We do not believe that this is appropriate under a coastal permit. The coastal permit should only authorize development that can and will be served by available water, and that should not be left to a future building permit assessment period that may be 5, 10, to 15 years down the line when circumstances may be different. Either the project has water or it doesn't, and to the degree it does, then it needs to be clearly maintained. If not, and if it is left to a future building permit assessment period, it is not clear to what degree such an assessment affects allowable development under the coastal permit, and the way in which the lack of water means that the project needs to be reduced (and the proposed approval lacks an implementation provision to require such reduction – see also discussion above about “using up” available allotments). The Applicant should be responsible for securing all the water necessary for the entire approved development.

Finally, given the lack of clarity over phasing and uses, it will be critical that all service constraints are analyzed for the ‘worst case’ scenario, and that that degree of service need is presumed for evaluation purposes.

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5. **Other:** It appears that the parking lot planters are encroaching into the 150 foot wetlands buffer as shown in the proposed landscape plan. This is inconsistent with the protection of sensitive resources and the County conditions.

In closing, it is clear that there is the need for additional analysis, including critically in terms of evaluating reduced scale alternatives to meet LCP requirements. In addition, many aspects of the project have been rapidly changing, and there is a lack of precision associated with the proposal at this juncture. This is a significant project at a very large scale and scope. We encourage the County to take the time that is required to allow for the necessary analyses to occur and the necessary project materials to "catch up" to the permitting process. We believe that good planning and public policy dictate as much, and we look forward to additional coordination and discussion on the proposed project, including as new information and materials are developed moving through the County's CDP evaluation process. If you have any questions regarding these comments, please contact me at the address and phone number listed below.

Sincerely,



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cc: Scott Holmes, Applicant
Don Horsley, District 3 Supervisor
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Attachment 1

Building footprint square footage estimates were derived by creating polygons in Google Earth Pro. Heights of the largest buildings were gathered from available permit information or estimated from Google Earth Street view. This table represents the data collected filtered from smallest to largest by square footage of the building footprint. All Big Wave proposed buildings were added to the table for comparison.

Building	Square Footage of Building Footprint Estimate	Land Use	Height
382	242		
385	328		
94	389		
372	407		
107	448		
386	476		
373	559		
37	625		
338	656		
115	657		
371	661		
47	684		
112	723		
48	726		
49	729		
158	757		
384	764		
374	766		
263	771		
108	798		
356	829		
114	835		
222	835		
269	840		
121	845		
196	851		
247	859		
345	866		
331	872		
255	882		
244	884		
340	888		

Building	Square Footage of Building Footprint Estimate	Land Use	Height
211	899		
311	900		
194	906		
117	918		
390	920		
180	924		
337	924		
266	936		
245	941		
178	955		
342	958		
339	963		
182	972		
319	976		
329	977		
304	978		
274	988		
316	991		
330	993		
186	994		
334	1011		
295	1013		
122	1019		
351	1024		
243	1025		
281	1025		
221	1031		
264	1039		
198	1041		
225	1042		
259	1042		
292	1044		
197	1046		
380	1047		
155	1050		
349	1050		
346	1052		
256	1053		

Building	Square Footage of Building Footprint Estimate	Land Use	Height
336	1066		
294	1071		
242	1075		
348	1079		
249	1082		
206	1092		
355	1098		
190	1099		
344	1102		
378	1109		
335	1110		
163	1111		
358	1112		
297	1117		
277	1118		
157	1119		
223	1120		
300	1120		
58	1125		
246	1125		
161	1126		
288	1126		
209	1127		
44	1139		
257	1141		
188	1142		
189	1144		
305	1148		
207	1151		
220	1151		
210	1153		
343	1160		
164	1165		
214	1166		
353	1166		
254	1167		
350	1167		
113	1177		

Building	Square Footage of Building Footprint Estimate	Land Use	Height
268	1179		
168	1189		
208	1190		
393	1192		
228	1194		
165	1198		
203	1205		
262	1212		
192	1216		
273	1217		
321	1217		
289	1219		
248	1220		
162	1221		
183	1224		
347	1226		
285	1227		
151	1228		
267	1231		
284	1236		
333	1238		
279	1244		
357	1244		
293	1246		
184	1254		
204	1255		
32	1256		
167	1260		
298	1261		
59	1272		
159	1274		
320	1275		
377	1277		
251	1278		
154	1291		
361	1306		
296	1309		
213	1311		

Building	Square Footage of Building Footprint Estimate	Land Use	Height
276	1311		
306	1314		
101	1316		
102	1317		
275	1317		
261	1318		
227	1320		
191	1322		
290	1326		
313	1332		
200	1333		
218	1334		
308	1337		
376	1340		
199	1345		
201	1348		
215	1348		
307	1349		
232	1350		
312	1351		
160	1352		
299	1352		
148	1353		
166	1354		
301	1362		
195	1368		
219	1368		
60	1371		
258	1371		
326	1371		
291	1372		
341	1372		
193	1373		
278	1376		
216	1378		
318	1380		
271	1381		
140	1387		

Building	Square Footage of Building Footprint Estimate	Land Use	Height
328	1387		
205	1391		
237	1393		
282	1393		
145	1397		
280	1398		
156	1402		
272	1409		
241	1415		
360	1416		
327	1420		
212	1421		
354	1422		
392	1423		
314	1430		
252	1431		
100	1445		
309	1446		
147	1449		
116	1453		
150	1456		
302	1462		
179	1469		
152	1471		
240	1471		
286	1475		
169	1476		
131	1479		
175	1483		
54	1484		
283	1484		
153	1486		
185	1492		
229	1494		
173	1498		
265	1499		
270	1499		
202	1500		

Building	Square Footage of Building Footprint Estimate	Land Use	Height
236	1510		
253	1512		
24	1513		
224	1513		
187	1521		
317	1525		
362	1534		
226	1555		
238	1568		
38	1576		
119	1582		
170	1585		
359	1589		
95	1592		
29	1604		
144	1612		
315	1613		
181	1615		
310	1623		
143	1639		
176	1640		
363	1642		
123	1644		
250	1647		
134	1660		
370	1667		
260	1668		
53	1669		
239	1671		
177	1682		
231	1685		
322	1688		
3	1693		
233	1695		
99	1704		
324	1708		
383	1724		
234	1727		

Building	Square Footage of Building Footprint Estimate	Land Use	Height
52	1728		
93	1729		
352	1738		
25	1741		
171	1748		
235	1767		
217	1769		
51	1770		
325	1770		
7	1783		
142	1783		
323	1814		
332	1816		
23	1830		
172	1843		
69	1870		
381	1913		
96	1921		
141	1951		
56	1958		
149	1970		
303	2022		
111	2038		
80	2048		
287	2055		
2	2099		
55	2100		
174	2117		
15	2136		
39	2150		
4	2164		
8	2167		
92	2168		
6	2169		
128	2189		
88	2207		
125	2250		
391	2250		

Building	Square Footage of Building Footprint Estimate	Land Use	Height
146	2286		
14	2299		
65	2313		
86	2329		
389	2338		
42	2353		
135	2354		
139	2362		
369	2380		
230	2401		
26	2407		
27	2433		
133	2461		
84	2465		
110	2490		
16	2493		
106	2502		
50	2513		
388	2513		
17	2516		
375	2551		
82	2565		
57	2612		
90	2632		
18	2664		
81	2673		
19	2701		
31	2719		
33	2753		
78	2761		
97	2784		
103	2794		
89	2837		
20	2843		
9	2870		
105	2882		
10	2883		
109	2949		

Building	Square Footage of Building Footprint Estimate	Land Use	Height
379	3032		
87	3060		
74	3082		
28	3102		
40	3121		
130	3159		
132	3271		
98	3409		
11	3532		
72	3556		
83	3789		
73	3911		
1	3975		
85	4115		
21	4238		
62	4382		
36	4419		
91	4530		
30	4630		
67	4666		
5	4747		
120	5023		
68	5046		
22	5056		
71	5086		
61	5210		
79	5213		
12	5310		
34	5387		
41	5466		
104	5673		
118	5675		
76	5697		
75	5813		
124	5977		
127	6104		
66	6550		
77	6722		

Building	Square Footage of Building Footprint Estimate	Land Use	Height
64	6940		
13	7132		
70	7784		
368	8340		
63	9170		
138	9351		
366	9487		
129	10375	Visitor Serving: Harbor District concession building-Shopping area, mavericks, bar, restaurants	~25
WC 2	10585	Wellness Center	30
387	10670	202 California: Twice as Nice warehouse. Only front middle section is 2 story for offices, the rest is merchandise stacked high on racks.	~23
WC 1	11760	Wellness Center	30
35	12294	147 Princeton Ave: Romeo Packing Storage	~24
367	13606	Low 1-story hangar on airport property	~10
BB Lot 4	15075	Office Park	34
BB Lot 5	15375	Office Park	34
BB Lot 6	16200	Office Park	34
BB Lot 3	16350	Office Park	34
BB Lot 2	18000	Office Park	34
364	18977	Taller one story hangar on Airport Property	~15
365	19996	Taller one story hangar on Airport Property	~15
137	20699	860 Airport Street: Several Adjoining Warehouses, all low one story except the newest which is taller.	23
WC 3	23500	Wellness Center	30
43	31098	106 Princeton Ave: Romeo Packing (fertilizer)	~24
136	39554	850 Airport Street: Gymstown gymnastics, two autorepair shops, and Bay area Restoration.	24
126	91533	Visitor Serving: Harbor Village	36

Attachment 2

Screen shot of the polygons created in Google Earth Pro with the Big Wave proposed 8 Building Alternative overlay.

