
Addendum to the Big Wave Wellness Center and Office Park Project EIR

North Parcel Alternative

State Clearinghouse #2008102109



July 2014



San Mateo County
Planning and Building Department

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**ADDENDUM TO THE BIG WAVE WELLNES CENTER
AND OFFICE PARK PROJECT EIR
NORTH PARCEL ALTERNATIVE**

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Chapter 1. Introduction

1.1 BACKGROUND

In October 2010, the San Mateo County Planning Commission certified an Environmental Impact Report (EIR) for the Big Wave Wellness Center and Office Park Project (PLN2005-00481 and PLN2005-00482) (hereinafter referred to as the 2010 EIR and the 2010 Big Wave Wellness Center and Office Park Project). The certification of the 2010 EIR was appealed to the Board of Supervisors; the appeal was denied in March 2011, resulting in the County's approval of the 2010 project. The Board's decision to uphold the Planning Commission's decision was appealed to the California Coastal Commission (CCC). The CCC found substantial issues with the project and sustained the appeal, resulting in the denial of the project in August 2012.

The original Big Wave Wellness Center and Office Park project was subject to extensive environmental review and public comment. The Final EIR comprises three volumes containing technical appendices, 245 comment letters, responses to comment, and project changes.

The project applicant has since revised the project to concentrate development on the northern parcel (APN047-311-060) and reduce its scale. The revised project, referred to as the Big Wave North Parcel Alternative (Big Wave NPA), reflects a working collaboration with the CCC and other agencies to address the issues of concern. San Mateo County is now processing the revised project under a new permit application.

1.2 REGULATORY GUIDANCE

CEQA Guideline §15162(a) provides that when an EIR has been certified for a project, no subsequent EIR shall be prepared for that project unless the Lead Agency determines, on the basis of substantial evidence in the light of the whole record, that one or more of the following circumstances exist:

- 1) Substantial changes are proposed in the project which require major revisions to the EIR due to involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
- 2) Substantial changes occur in the circumstances under which the project is undertaken which require major EIR revisions due to involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
or
- 3) New information of substantial importance which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete shows any of the following: A) The project will have significant effects not discussed in the previous EIR; B) Significant effects previously examined will be substantially more severe than shown in the previous EIR; C) Mitigation or alternatives previously found not feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponent declines to adopt the mitigation measure or alternative; or D) Mitigation or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce significant effects on the environment but the project proponent decline to adopt the mitigation measure or alternative.

CEQA Guideline §15163 provides that a Lead Agency can prepare a supplement to an EIR rather than a subsequent EIR if a subsequent EIR pursuant to §15162 is required and only minor additions or changes are needed to make the previous EIR adequate to address the changed situation.

CEQA Guideline §15164 provides that the Lead Agency may prepare an Addendum to a certified EIR if none of the conditions described in §15162 have occurred. A brief explanation of

the decision not to prepare a subsequent EIR pursuant to §15162 must be included in the Addendum, Lead Agency's findings on the project, or elsewhere in the record. The explanation must be supported by substantial evidence.

1.3 ENVIRONMENTAL REVIEW PROCESS

Pursuant to CEQA Guidelines §15162(a), the County has reviewed the Big Wave NPA project application, reviewed comments from public agencies and committees, subsequent technical studies, and the certified EIR for the Big Wave Wellness Center and Office Park to determine:

- 1) the extent to which project impacts have been addressed by the previously certified EIR for the Big Wave Wellness Center and Office Park project,
- 2) whether project changes create new significant or more severe project impacts,
- 3) whether new circumstances or new information create new significant or more severe impacts or require new analysis, and
- 4) whether any identified new significant or more severe impacts are adequately addressed by previously approved project mitigation.

Although the project description has substantially changed, the changes have been designed with the expressed purpose of reducing environmental effects. The County has determined that the Big Wave NPA project has similar or reduced environmental impacts from those described in the certified EIR. There are no new significant environmental impacts or previously identified significant impacts made more severe by project changes, new circumstances, or new information. Therefore, the County has determined not to prepare a subsequent EIR pursuant to CEQA Guideline §15162. Rather, the County has determined that an EIR addendum should be prepared as the appropriate CEQA document to address project revisions in accordance with CEQA Guideline §15164.

CEQA Guideline §15164(c) provides that an addendum need not be circulated for public review but can be included in or attached to the final EIR or adopted negative declaration.

1.4 PURPOSE OF DOCUMENT

This document comprises an Addendum to the certified Big Wave Wellness Center and Office Park EIR. The purpose of this Addendum is to address project changes proposed by the Big Wave NPA. This Addendum modifies and supplements the project description and environmental impact analysis contained in the Big Wave Wellness Center and Office Park EIR. The scope of the Addendum is limited to 1) identifying project changes, 2) presenting environmental analysis of new project features or new information not previously addressed, and, 3) modifying mitigation measures to reflect project changes and new information. CEQA Guidelines Section 15164 does not prescribe the exact content of an addendum to address project changes. As such, an addendum is not required to include a revised version of the previously approved EIR. To ensure clarity as to which mitigation measures remain applicable, mitigation text is presented with track changes showing added language as underlined and obsolete language in ~~strikeout~~.

Chapter 2. Project Description

2.1 PROJECT LOCATION AND SITE DESCRIPTION

The Big Wave NPA project site is located on Airport Street in the unincorporated Princeton area in San Mateo County (Figure 1). The project site is comprised of two parcels: the north parcel (APN 047-311-060) is 14.25 acres and the south parcel (APN 047-312-040) is 5.28 acres. The parcels are relatively flat and gently sloped to the west and south. Site elevations range from 9.0 to 27.7 feet National Geodetic Vertical Datum (NGVD). The two parcels presently contain active agricultural fields irrigated by water from a well on the north parcel.

A natural drainage running east to west separates the two parcels and drains into the Pillar Point Marsh, a salt marsh habitat. A total of 0.74 acres (32,180 square feet; sq. ft.) of the project site consists of wetlands as defined by the California Coastal Act. A portion of the Coastal Act wetlands, 0.45 acres, is considered Federal jurisdictional waters/wetlands, under the permit authority of the U.S. Army Corps of Engineers (USACOE).

The project site is surrounded by the Half Moon Bay Airport to the east, the Pillar Ridge Manufactured Home Community to the north, the Pillar Point Headlands and Pillar Point Marsh to the west, and the industrial/commercial development of the Princeton/Pillar Point Harbor to the south (Figure 2). Pillar Point Ridge, west of the project site, lies between the marsh and the coastline and offers recreational hiking trails. Beach access to Pillar Point is provided south of the project site from the Mavericks parking area at the west terminus of West Point Avenue and at the eastern terminus of West Point Avenue at Princeton Avenue (Figure 3).

2.2 SUMMARY OF PROJECT CHANGES

An overview of the primary difference between the 2010 Big Wave Wellness Center and Office Park Project, which was considered by the County in 2011 and the Big Wave NPA project under current consideration is presented in Table 1. The original Big Wave Wellness Center and Office Park Project proposed development on both the north and south project parcels and included 225,000 square feet of industrial and office space in eight buildings, a 70-bed Wellness Center that would be a residential living facility for developmentally disabled (DD) adults and their aides, a 20,000 sq. ft. storage/utility building, and 690 parking spaces. Water to the project would have been provided by an on-site well and sanitary sewer service was proposed to be provided by on-site wastewater treatment and disposal as recycle water, with connection to Granada Sanitary District as a back up.

The revised Big Wave NPA, in contrast, places all Wellness Center and Office Park buildings on the northern parcel. The north parcel would be subdivided into seven lots (Lots 1-7). Lot 1 (11.05 acres) would include the common areas of parking, wetland and wetland buffer areas, and fire trail. Lots 2 through 6 (each 13,500 sq. ft.) would contain one office/manufacturing building for each lot, including Building A, owned by the Wellness Center. Lot 7 (1.66 acres) would include the 4-building Wellness Center.

Project use of the southern parcel would be limited to farming/gardening, wetland restoration, boat storage with restroom facility, archaeological reserve, and coastal access parking. The south parcel would be subdivided into two lots (Lots 1-2). Lot 1 (1.82 acres) would contain outdoor boat storage and a designated archaeological site reserve area. Lot 2 (3.4 acres) would remain undeveloped.

The Big Wave NPA project proposes five, rather than eight Office Park buildings, which is three fewer buildings than proposed in the original 2010 Project, and reduces the Office Park square footage from 225,000 sq. ft. to 189,000 sq. ft. Parking is reduced from 690 to 554 spaces. Maximum building heights are reduced from 51 to 38 feet from grade. Total grading is reduced from 22,748 cubic yards (yd³) of cut and 26,850 yd³ of fill to 735 yd³ of cut and 21,400 yd³ of gravel fill. Wetland buffers are increased. First floor elevations of the Wellness Center buildings

are raised for protection against tsunami run-up. Municipal water service would be provided by Montara Water and Sanitary District (MWSD; subject to Local Agency Formation Commission (LAFCo) action, as described in Section 2.5.2 below) rather than reliance on the on-site well. Wastewater service would be provided by Granada Sanitary District (GSD) and there would be no on-site wastewater treatment. The on-site well would be used for irrigation purposes and to fill a storage tank (up to 200,000 gallons) for fire protection. Similar to the 2010 Big Wave Wellness Center and Office Park Project, project construction for the Big Wave NPA would be phased over several years, specifically up to 15 years, as described in Section 2.4 below.

Table 1. Overview of Primary Project Changes from 2010 Project to Current Proposal

	2010 Project ¹	Big Wave NPA
Subdivision and Site Development	North Parcel: 10 lots for Office Park buildings, parking, and wetland buffer. South Parcel: 3 lots for Wellness Center buildings, wetland buffer, public commercial storage building, and parking.	North Parcel: 7 lots for Office Park and Wellness Center buildings, parking, and wetland buffer. South Parcel: 2 lots for public boat storage, archaeological reserve, wetland buffer, and agriculture/organic gardening.
Office Park/Industrial Use	8 buildings: 225,000 sq. ft. ² business space; 92,000 sq. ft. footprint	5 buildings: 189,000 sq. ft. business space; 54,000 sq. ft. footprint
Wellness Center	98,745 sq. ft 70 Units: 50 DD Adults 20 staff persons	97,500 sq. ft. 57 Units: 50 DD Adults 20 staff persons
On-site Parking Spaces	690	554
Maximum Building Height (feet from grade)	51 feet	38 feet
Site Coverage	Impervious cover: 3.0 acres Pervious cover: 7.5 acres	Impervious cover: 2.5 acres Pervious cover: 5.4 acres
Grading (cubic yards; yds ³)	22,445 yds ³ of cut 26,050 yds ³ of fill (3,605 yds ³ gravel import)	735 yds ³ of cut and backfill 21,400 yds ³ of fill (gravel import)
Water Service	Domestic water demand: 26,000 gpd: 10,000 gpd from existing on-site well and 16,000 gpd from wastewater recycling. Connection to Coastside County Water District for emergency back-up and fire protection (subject to LAFCo action) as an option. Fire water demand: Wellness Center swimming pool or 180,000 gallon below-ground storage tank or a combination of municipal hookup and on-site storage.	Domestic water demand: 9,765 gpd from Montara Water and Sanitary District (MWSD; subject to LAFCo action). Fire water demand: Connection to MWSD. Water storage tank (up to 200,000 gallons) in basement of Wellness Center Building 3. Irrigation demand: 10,500 gpd from on-site well.

	2010 Project ¹	Big Wave NPA
	Irrigation demand: 10,000 gpd from on-site well.	
Wastewater Service	On-site wastewater treatment plant and disposal through a combination of municipal hookup to Granada Sanitary District (GSD) and on-site recycle water usage (drain fields eliminated in Final EIR) or municipal hookup only.	Sewer service connection to GSD for wastewater collection, transmission, treatment and disposal.
Project Construction Phasing Timeframe	20 years	15 years
Wetland Buffer	North and south parcel buildings setback 100 feet from wetland boundary.	North parcel buildings and south parcel boat storage setback 150 feet from wetland boundary.
¹ Project as described in San Mateo County Planning and Building Department staff report to Board of Supervisors for Meeting Date March 15, 2011. Description incorporates Project Description changes identified in the Final EIR. ² Including the approx. 20,000 sq. ft. storage/utility bldg. on the south parcel, total area would be 245,000 sq. ft.		

2.3 PROJECT CHARACTERISTICS

The applicant indicates that the Big Wave NPA project would be designed to be an economically sustainable development that provides housing and employment opportunities for low-income DD adults at the Wellness Center. All buildings and development would be designed to meet Leadership in Energy and Environmental Design (LEED) certification requirements.

The primary components of the proposed project include office park buildings, housing for DD adults and their aides, business operations for DD adults, boat storage, public coastal access parking, and wetland and archaeological preservation.

2.3.1 Site Development

Project development would be concentrated on the north parcel with the south parcel reserved for recreational service outdoor boat storage, coastal access parking, an organic garden area, and a wetland buffer area. The Vesting Tentative Map (Figure 4) would subdivide the north parcel into seven lots (Lots 1-7). An overview of the subdivision is presented in Table 2. Lot 1 would include the common areas of parking, wetland and wetland buffer areas, and fire trail. Lots 2 through 6 (each 13,500 sq. ft.) would contain one office/manufacturing building for each lot including Building A owned by the Wellness Center. Lot 7 (1.66 acres) includes the 4-building Wellness Center.

The south parcel would be subdivided into two lots (Lots 1-2). Lot 1 (1.82 acres) would contain outdoor boat storage and a designated archaeological site reserve area. Lot 2 (3.4 acres) would remain undeveloped.

North Parcel		
Lot 1	11.05 acres	Common Area: Office Park and Wellness Center Parking, Coastal Access Parking, Wetland Buffer
Lot 2	0.31 acres	Office Park: Building A

Table 2. Big Wave NPA, Overview of Site Development		
Lot 3	0.31 acres	Office Park: Building B
Lot 4	0.31 acres	Office Park: Building C
Lot 5	0.31 acres	Office Park: Building D
Lot 6	0.31 acres	Office Park: Building E
Lot 7	1.66 acres	Wellness Center: Buildings 1, 2, 3, and 4
South Parcel		
Lot 1	1.82 acres	Coastal Access Parking, Outdoor Boat Storage and Parking, Archaeological Reserve, Wetland Buffer, Undeveloped
Lot 2	3.4 acres	Coastal Access Parking, Wetland Buffer, Undeveloped

2.3.1.1 Office Park

Building Details

Five Office Park buildings would be constructed, each on 13,500 square-foot lots (Lots 2-6; Figure 4). While all office park buildings would be 33 feet in height, Buildings B through E are three-story and Building A is two-story. The buildings would offer 189,000 square feet of space. Building elevations are summarized in Table 3. Floor plans, renderings, and the architectural design concept are presented in Attachment A. Solar panels would be mounted flat on roof tops, six inches above the roofs (see Section 2.3.1.2; BW Energy). An anti-glare, anti-reflective surface would be used on all solar panels in order to minimize glare and reflection from the panels. Maximum building heights in Table 3 include solar panels and holding racks.

Exterior lighting would be provided in parking lot areas and walkways using three-foot tall low luminosity lighting bollards that direct the lighting downward. Each bollard would have a maximum power consumption of 100 watts and a maximum coverage of 30-foot diameter circle. The bollards would be spaced at 20-foot intervals along all paved walkways and parking islands. An example of the lighting bollard is presented in Attachment A.

Table 3. Office Park and Wellness Center, Building Elevations									
Building	Max Stories	Average Existing Grade Elevation	Average Finish Grade Elevation	Slab Elevation	Unfinished Basement ¹ Elevation	First Floor Elevation	Building Height from Slab	Roof ² Elevation	Max Building Height from Existing Grade
Wellness Center									
Building 1 Gym and Basketball Court	1	21.5'	22.5'	23'	n/a	23'	Gym: 17 BB Court: 26'	Gym: 40' BB Court: 49'	Gym: 19' BB Court: 28.5'
Building 2 Residential Use on Upper Floor; Basement for Storage	2	20.5'	22'	23'	23'	34'	22'	45'	25.5'

Table 3. Office Park and Wellness Center, Building Elevations									
Building	Max Stories	Average Existing Grade Elevation	Average Finish Grade Elevation	Slab Elevation	Unfinished Basement ¹ Elevation	First Floor Elevation	Building Height from Slab	Roof ² Elevation	Max Building Height from Existing Grade
Building 3 Residential Use on Upper Floor; Depressed Basement for Future Pool Deck	2	19.5'	22'	19' (below grade)	19'	34'	23' ³	45'	26.5'
Building 4 Residential Use on Upper Floors; Basement for Theater, Kitchen and Dining	3	19'	22'	23'	n/a	23'	33'	56'	38'
Office Park									
Building A	2	21'	22'	23.5'	23.5'	34.5'	33'	56.5'	36.5'
Building B	3	20.5'	21.5'	22.5'	n/a	22.5'	33'	55.5'	35.5'
Building C	3	19'	20.5'	21.5'	n/a	21.5'	33'	54.5'	35.5'
Building D	3	18'	19.5'	20.5'	n/a	20.5'	33'	53.5'	35'
Building E	3	18.5'	20'	21'	n/a	21'	33'	54'	35.5'
¹ The term "Basement" is used by the applicant to describe unfinished floors and is not used to suggest that floors are below grade. ² Roof Elevation equals Slab Elevation plus Building Height from Slab; with the exception of Building 3 (see note 3). Due to variations in the existing grade over the area of a building, Average Existing Grade Elevation plus Max. Building Height from Existing Grade may not equal Roof Elevation. ³ For Building 3, "building height from slab" shows building height from grade, as slab is below grade.									

Office Uses

The applicant proposes General Office, Research and Development, Light Manufacturing, and Storage uses, with square footages of each use to be determined by prospective tenants and the parking required/available for each permitted use. As tenants occupy the buildings and site parking is allocated according to County parking requirements. The Office Park buildings would be occupied by private firms with their own workers. Building A would be owned by the Wellness Center.

2.3.1.2 Wellness Center

Building Details

Four Wellness Center buildings would be constructed on a 72,157 square-foot lot (Lot 7) and contain a total of 70,500 square feet of building floor area. Buildings 1, 2, and 3 would each have a building footprint of 9,750 square feet. Building 4 would have a building footprint of 13,750 square feet (Figure 4). Building heights would range from 25.5 to 38 feet from existing grade (Table 3). Building 1 would be non-residential in use, containing a basketball court, gym, and

locker rooms. Buildings 2 and 3 are two-story and would each have 13 bedrooms. Building 4 is three-story and would have 31 bedrooms. No residential uses are proposed on basement (ground level) floors. Building elevations, floor plans, and the architectural design concept are presented in Attachment A. Solar panels would be mounted flat six inches above the roofs (see Section 2.3.1.2; BW Energy). Maximum building heights in Table 3 includes solar panels and holding rack.

Residential Facilities

While the actual configuration of the Wellness Center would depend on demand, it would include no more than 57 bedrooms to provide affordable housing for a maximum of 50 DD adults and 20 staff persons. All non-staff residents of the Wellness Center would require a professionally diagnosed Developmental Disability that meets the requirements set by the non-profit Board of Directors. Wellness Center residents would include DD adults that live only on their Social Security disability pension (an average income of approximately \$12,000 per year).

Residential Floor Plans are approximate and flexible: A "Basic Residential Unit" contains two bedrooms, a shared living area, two bathrooms, and no kitchen. All food would be prepared in a common commercial kitchen. Actual residential layout may include some "studios" with a bedroom, living area and bathroom that are not shared with another bedroom. Bedrooms may accommodate one or two persons.

Kitchen and Dining Facilities

The basement (ground floor) level of Building 4 would provide an industrial kitchen and dining common area for Wellness Center residents. This kitchen would be used for any of the BW Catering/Food Service operations described below.

Recreation Facilities

Each Wellness Center building would house recreation facilities. These facilities include a fitness center (gym, basketball court, and lockers) in the single story Building 1, a pool (not counted in total square footage) on the basement level in Building 3, and a theater on the basement (ground) level in Building 4. The use of all recreational facilities would be restricted to Big Wave residents, staff, guests, and Office Park employees. Recreational facilities would not be available to the general public.

DD residents are mostly chemical sensitive. A salt water pool is proposed with salt levels that are similar to the body salt concentration (0.3%) with UV disinfection to limit the need for chlorination. Algae would be controlled in the indoor pool located below Building 2 or 3 with UV limiting windows and a small residual chlorine level generated by electrolysis. A salt pool with similar salt concentrations as humans with little or no chlorine eliminates the need for showers and the pool building would only have locker rooms with toilet facilities.

A water tank may be proposed for fire protection instead of a pool as described in Section 2.3.7. If a water tank is installed, the water tank may be designed for conversion to a pool once the fire system is improved. If the need for a water tank becomes permanent, the pool may be eliminated or relocated to basement of Building 2.

Big Wave Business Operations

The Wellness Center would offer its residents a variety of services (e.g. personal finance, meal services, and aide assistance) and job opportunities due to a number of business operations that would employ residents, and, in some cases, generate revenue to maintain the economic sustainability of the Wellness Center. The Big Wave businesses would be small businesses operated by the residents of the Wellness Center for the Big Wave Project. The Big Wave businesses are designed to provide extra income to cover the living expenses of Wellness Center residents. These businesses are proposed to include: BW Boat Storage; BW Catering/Food Services; BW Communications (Fiberlink); BW Energy; BW Farming; BW Maintenance; BW Recycling; BW Transportation; and BW Water.

BW Boat Storage. BW Boat Storage would operate an outdoor boat storage area on Lot 1 of the south parcel. As the site would not be staffed, there would be no specific hours of operation and the site can be accessed as needed by owners using a security code. Maintenance and management services would be provided by four full-time DD residents. See Section 2.3.1.3 for a detailed description.

BW Catering/Food Services. BW Catering/Food Services would operate a commercial kitchen in Building 4 that could provide food for up to 70 Wellness Center residents. The same facilities would provide catered meals to the office workers at the Office Park upon order. A café in Building 4 would serve residents on-site and would cater café offerings to the Office Park. It would not serve the public. The Catering operation would require one full-time dietician and four full-time DD residents of the Wellness Center.

BW Communications. BW Communications would provide Internet and telephone communications for the Wellness Center and Office Park through its employees and contractors. The Communications systems would employ one part time technician (200 hours per year) and three full-time DD residents.

BW Energy. BW Energy would include up to 600 kilowatts (kW) of solar voltaic, one to three million British thermal unit (BTU) per hour of solar heating and one million BTU per hour of geothermal/evaporative cooling. Geothermal cooling would be accomplished by providing a water cooling loop that would be installed below the slab of commercial buildings prior to placing the slab. The cooling loop would be buried at a depth of about four feet for potential commercial businesses requiring extensive cooling (i.e., server farms). Evaporative cooling is a low energy method of air conditioning for server farms. BW Energy would own and operate a natural gas engine generator (up to a 600 kW) in Building A designed for backup purposes and 5 kW of natural gas fuel cells for backup communications. Maintaining this system would generate four full-time jobs for DD residents.

The proposed project would install the most cost effective method of photovoltaic power that is available at the time of installation. Solar panels would be located on the roofs of the proposed buildings. There is approximately one acre of roof on the Wellness Center available for power generation, projected to be enough to generate peak power of approximately 50 kW to 150 kW and an average of approximately 50 kW over an 8-hour period. The system would require approximately 750 panels and occupy a roof area of approximately 9,000 square feet. The Office Park has 1.5 acres of roof space. This roof space is capable of generating 450 kW of peak power and an average of 150 kW over an 8-hour period. The system would require approximately 2,500 panels and occupy about 30,000 square feet of roof space.

BW Farming. BW Farming would operate an on-site organic farming operation for the production of agricultural commodities, including produce, chicken, and eggs for use at the Wellness Center. All farm and processed products would be used on-site or sold to Office Park employees only. The BW Farming operations would provide potential employment opportunities for the DD residents (approximately 10 residents of the Wellness Center), one farm manager fulltime, as well as 10% of a farmer's time.

Organic farming areas would also include a temporary native plant nursery that would supply about 15,000 to 30,000 plants per year for on-site landscaping projects (Figure 5). Nursery work would consist of potting plants. No greenhouses are proposed. Once landscaping is complete, the nursery work would be largely discontinued. Minor nursery work, could continue as part of the BW Farming operation if an outlet for the plants was determined. The nursery would be located in the area of archaeological reserve behind the boat storage.

BW Maintenance. BW Maintenance would provide maintenance services for the Office Park and Wellness Center facilities and business operations. It would also provide laundry services in Building 4 for the Office Park and Wellness Center. One full-time facilities manager would be required and five full-time DD residents would be hired.

BW Recycling. BW Recycling would promote the purchase of recyclable materials and supplies for the Wellness Center and Office Park. They would collect and sort all metal, plastic, glass, and paper recyclables, and compost food and landscape waste. Compost that meets organic standards would also be used in the proposed farming operations. Non-organic compost would be used in landscape operations. The recycling operation would employ a part time manager (300 hours per year) and four full-time DD residents. There would be an indoor recycling room in each office building and an indoor recycling facility located within storage areas of the Wellness Center.

Worm composting of food scraps, shredded paper, and yard waste would occur outdoors on the south parcel. Bins for food scraps and landscape collection would be stored in a designated area within the Wellness Center (Figure 5).

BW Transportation. BW Transportation would provide the following: collecting fees for event parking (e.g., Maverick's Surf Contest and Dream Machines), parking services and management at the Office Park, and shuttle services (involving only one van or bus) for the residents. Shuttle service would provide transportation to DD residents to off-site events and places of employment, as well as transport of food and produce to market. BW Transportation would require one full-time bus driver and three full-time DD residents. The shuttle bus would park in a designated parking space allocated to the Wellness Center.

BW Water. BW Water would provide maintenance of on-site water distribution lines from the MWSD main line and the separate hot water and cold water pumping and treatment systems for the Office Park. BW Water would require four full-time DD residents.

2.3.1.3 Boat Storage

An outdoor boat storage area (Lot 1), operated by the Wellness Center as a Big Wave business, would be located on the south parcel. The boat storage area would be 1.12 acres in size and provide 26 boat storage spaces (each 40 foot long by 12 wide), 27 vehicle parking spaces associated with boat use and storage, and a 190 square-foot precast concrete restroom building. Driveways allow for boats with trailers to be backed into the spaces.

Locked security fencing would be constructed around the lot perimeter, with combination access for the boat owners. Fencing would be willow wattle (Figure 6; Detail A), less than six feet high with the lowest horizontal more than 1.5 feet above the ground. There would be no specific hours of operation, as the site can be accessed as needed by owners. Lot signage consists of a 12-inch square metal sign on the gate with a contact phone number for the business manager. The site would not be staffed. Lighting includes the installation of 3-foot tall lighting bollards, with 30-foot minimum spacing, along the perimeter of Lot 1.

2.3.1.4 Archaeological Reserve

An archaeological resource located on the south parcel would be preserved on a 0.70-acre site at the rear of Lot 1 (Figure 4). The reserve area would be used for organic gardening. No structures or permanent development are proposed.

2.3.1.5 South Parcel Lot 2

Lot 2 on the south parcel would remain undeveloped (Figure 4). Agricultural uses would continue on the parcel in connection with the planned BW Farming operation, as described in BW Farming operations in Section 2.3.1.2 above.

2.3.2 Site Access and Parking

Vehicle Access: Main vehicle access to the Office Park and Wellness Center areas would be from Airport Street at two entry/exit points and a separate northern entrance for fire and bus vehicle access (Figure 4). Minimal improvements to Airport Street are proposed, involving construction of an 8-foot wide coastal trail and a curb to allow for coastal access parking along the frontage of the south parcel, are proposed (Figure 7).

Vehicle access in and out of the boat storage area would be from a single driveway off Airport Street. Right and left turns in and out of the driveway would be permitted.

Vehicle access to the archaeological reserve and the undeveloped south parcel Lot 2 would be restricted to vehicles and equipment associated with property maintenance and agricultural use (see Section 2.3.1.2; BW Farming). Access to this lot would be provided by a driveway at the front of Lot 2 of the south parcel and a gated entry from the back of the boat storage area on Lot 1 (Figure 6).

Fire Trail: On the north parcel, a 20-foot wide permeable concrete fire trail would be provided from the southern parking area along the rear of Office Park Buildings D, E, and A to provide fire equipment access (Figure 4).

Utility Road Easement: The project would maintain an existing 20-foot wide non-exclusive access and utility easement along the northwestern property line (Figure 4; North Parcel Lots 1 and 7). The easement would contain an 8-inch fire waterline and 2-inch waterline on North Parcel Lot 1 as shown in the Utility Plan (Figure 8) and discussed in Section 2.3.6.

Parking: A total of 554 parking spaces would be provided on the north and south parcels including 92 coastal access parking spaces.

Lot 1 of the north parcel would contain 525 parking spaces. Of this total, 420 spaces would be designated for the Office Park, 42 for the Wellness Center, and 63 spaces for coastal access.

Lots 1 and 2 of the south parcel would provide 29 coastal access spaces on-site along the Airport Street frontage (Figure 4) using a parking bay separated from Airport Street traffic by a raised curb. The parking bay entry and exit would be one-way and utilize angled parking.

Coastal Trail: An 8-foot wide paved coastal trail would be developed along the Airport Street frontage. The coastal trail would be built within the Airport Street right-of-way along the north parcel and adjacent to the proposed public coastal access parking on the south parcel (Figure 4). The trail surface would be decomposed granite (Figure 7, Detail F).

A coastal trail extension would also be provided along the northwestern property line (Figure 4; North Parcel Lots 1 and 7), enabling the potential for future linkage to the county parkland trails along Pillar Point Ridge. The former Peninsula Open Space Trust (POST) trail was acquired by the County in 2011 and trail extension was completed prior to the County's acquisition.

2.3.3 Landscape Plan

The proposed Landscape Plan is presented in Figure 5. All plantings would be climate and drought tolerant, native, biologically sensitive, and non-invasive. Plantings would be installed in accordance with the Landscaping Plan. Proposed vegetation communities are identified in Table 4. Individual trees (24-inch box) would be planted in parking lot islands on the north parcel. Tree specimens include live oak, madrone, California buckeye, big leaf maple, and red alder. The plant species included in each vegetation community along with the designated planting densities are presented in Attachment C.

Vegetation Community	Square Footage	Acres
Coastal Riparian Forest	99,184	2.28
Mixed Willow Shrub Scrub	51,134	1.17
Willow Wattle	3,454	0.08
Sedge Meadow	13,588	0.31
Rush Meadow	69,172	1.59
Upland Forest	34,624	0.79

Table 4. Landscaping Plan Planting Tabulations		
Vegetation Community	Square Footage	Acres
Wildflower Garden	9,761	0.22
Organic Garden	190,357	4.37
Totals	471,274	10.81

2.3.4 Wetland and Riparian Buffer Zones

Wetland Buffer on North Parcel: Permanent protective wetland habitat fencing would be installed on the north parcel 150 feet from the delineated wetland boundary to the west (Figure 6). The wetland fencing would consist of a less than 6-foot high willow wattle fence with a chain link swing gate (Figure 6, Details B and C) allowing for fire access. Wetland habitat fencing would be constructed in Phase 1 at the start of construction for the Wellness Center. The phasing of project construction is described in Section 2.4 below.

All site development on the north parcel would be setback a minimum of 150 feet and up to 250 feet from the wetland boundary (Figure 6). Organic gardening, as described in Section 2.3.1.2 (BW Farming), is proposed in the wetland buffer zones.

The delineated wetland boundary occurs roughly 40 feet outside of the north parcel along 820 feet of property line on land owned by San Mateo County (APN 047-311-050). The project proposes including this adjacent property strip, roughly 30,000 square feet, in its Landscape Plan as shown in Figure 5. See Section 2.3.3 above for discussion of the planting plan.

Wetland Buffer on the South Parcel: On the south parcel, the wetland buffer extends from 100 feet up to 180 feet into the project property. The proposed outdoor boat storage and public coastal access parking area would be located outside the buffer zone. A willow wattle fence would be installed along the southwestern property boundary to form a living fence that would provide some security to the property (Figure 6). The wattle fence would be less than six feet high and have a minimum horizontal ground clearance of 1.5 feet to allow wildlife passage. Native plant vegetation to improve wetland habitat values is proposed for the majority of the buffer zone (Section 2.3.3). A portion of the buffer zone near the natural drainage would be used for organic gardening and establishment of a native plant nursery associated with the BW Farming business operations described in Section 2.3.1.2.

Wetland Restoration: The project application includes restoration of wetland values as proposed in the Riparian & Waters/Wetland Ecosystem Restoration Final Basis of Design Report (WSP 2012; Attachment B). The report outlines the activities proposed to restore wetland values within the buffer areas through site grading, installation of log structures, planting and irrigation, weed management, and maintenance and monitoring. Restoration activity would be limited to dry season (May to November) and adhere to the project Storm Water Pollution Prevention Plan (SWPP) and associated Temporary Erosion and Sediment Control (TESC) plan.

2.3.5 Grading and Drainage

The Big Wave NPA project proposes no rough grading on the project parcels. Development footprint elevations (Figure 6) would be established by laying 12 to 20 inches of imported gravel on top of the native soil surface. The total gravel fill would be 21,400 yds³: 20,000 yds³ on the north parcel and 1,400 yds³ on the south parcel. The project involves a cut of 735 yds³ (640 yds³ on the north parcel and 95 yds³ on the south parcel) for trenching and backfill of utilities. Spaces between buildings, all parking areas, and the boat storage area would be designed with permeable pavers covering the gravel base to infiltrate all storm drainage and comply with County runoff requirements (Figure 6). Pervious paving would cover 3.5 acres or 18% of the total project site as shown in Table 5.

Table 5. Site Coverage		
Proposed Use	Area of Site Coverage	% of Site (North and South Parcels)
Pervious Paving, North Parcel	3.52 acres	18%
Pervious Paving, South Parcel	1.92 acres	10%
Building Footprints	2.54 acres	13%
Wetland	0.74 acres	3%
Wetland Buffer	8.36 acres	34%
Organic Garden	4.37 acres	22%
Total Parcel Size	19.53 acres	100%

Construction storm drainage controls would be implemented as shown in the Erosion and Sedimentation Control Plan (Figure 10). Fiber rolls with silt fencing would be installed along the 150-foot wetland buffer on the north parcel and along the 100-foot wetland buffer on the south parcel (Figure 10). A 12-inch layer of drain rock (1.5" to 3" coarse aggregate) would be placed at the three construction entrances to the project site. The construction entrances would be maintained in a condition that prevents tracking or flowing of sediment onto Airport Street. Straw mulch would be used to provide temporary erosion control over disturbed areas.

No grading would occur within jurisdictional wetlands and waters of the United States. Grading within the wetland buffer from the drainage swale (the boundary of delineated State Wetlands, which bisects the project site), would occur for wetlands restoration and in accordance with the restoration plan (Attachment B).

2.3.6 Utilities

The proposed utility line connections for the project site are shown in Figure 8.

Water Service: Domestic and fire water supply to the Office Park and Wellness Center would be provided by the Montara Water and Sanitary District (MWSD) subject to LAFCo action, as described in Section 2.5.2 below. An 8-inch water main terminates on Airport Road at the Pillar Ridge Manufactured Home Community approximately 1,210 feet north of the project's north parcel. The Big Wave NPA project would install an 8-inch water main extension to the project property along the Airport Street right-of-way to provide domestic and fire water service. A fire hydrant installed on the property would provide access to fire flow. A dual meter for fire and domestic service would be established on the project site per MWSD standard detail requirements.

An 8-inch looped pipe would be installed around the north parcel building envelope to provide adequate water pressure. Domestic water supply would be distributed throughout the north parcel using 2-inch lateral supply lines. A 2-inch line would be extended to the south parcel along Airport Street.

An existing 4-inch well water irrigation line provides non-potable water to the south parcel from the agricultural well located on the north parcel. This water is stored in two existing water tanks located adjacent to the proposed restroom (Figure 8). Each water tank is nine feet tall and has a capacity of 6,000 gallons. This water would supply water demand for landscaping, gardening, and agricultural uses.

Water demand for the project development is estimated at 9,765 gallons per day (gpd) as shown in Table 6. Water consumption for the Wellness Center residents is estimated at 44 (gpd) based on one 20-gallon low flow shower per day, five gallons of shared kitchen use, four gallons of shared laundry, and 15 gallons of bathroom use (five low-flow toilet flushes and hand washing). Water consumption for the Office Park buildings is estimated at 15 gpd per person

based on five low-flow toilet flushes and hand washing per day. Urinals would be no flush water savers. Water consumption for the boat storage is estimated at 85 gpd based on 5% (1.3 out of 26) of the boat owners using their boats on any particular day, 30 gallons used to fill the boats, 30 gallons to dust off the boats prior to use, and five gallons for toilet and hand washing at the restroom.

The recreation facilities would have no showers and use no flush urinals. Assuming the pool gets a peak usage of 100 people per day with one low flush toilet use per person per day, equals a peak water consumption of 100 gallons per day for toilet use and an estimated another 30 gallons per day for wash down that may not end up in the pool. The pool would be heated with solar heaters and the heat maintained by limiting ventilation fans. Ventilation would be provided by opening windows around the pool area. Indoor pools with little ventilation would have evaporation rates of about 10 inches per year. This is about 70 gallons per day. Total water use for the pool would be about 200 gallons per day. The basketball court would not have wash down or showers but would have a similar peak toilet use of 100 gallons per day. This translates to a total recreational use of water to about 300 gallons per day.

Table 6. Project Water Demand, Daily and Peak Flows

Facility	# of Persons	Flow per Person (gpd)	Total Flow (gpd)	Equalized Flow (gpm)	Equalized Flow (mgd)	Peak Flow Factor = 6
Domestic Water Demand (MWSD)						
Wellness Center Residential	50	44	2,200	1.5	0.0022	9 gpm = 0.01 mgd
Wellness Center Employees	20	44	880	0.6	0.0009	3.6 gpm = 0.005 mgd
Wellness Center Recreation Facilities	200	1.5	300	0.2	0.0003	1.2 gpm = 0.0018 mgd
Office Park Business	420	15	6,300	4.4	0.0063	26 gpm = 0.04 mgd
Boat Storage Restroom	1.3	65	85	0.06	0.00009	0.4 gpm = 0.0005 mgd
Total	491		9,765	6.8	0.010	40 gpm = 0.06 mgd
Non-Potable Water Demand (On-site Well)						
Organic Garden and Landscaping			10,500			

Sewer Service: Sewer service to the Office Park and Wellness Center would be provided by the Granada Sanitary District (GSD) pursuant to a Sewer Connection Permit to be applied for and obtained from GSD by Big Wave. Wastewater from the Office Park and Wellness Center buildings would be collected by Big Wave in 2-inch pressurized sewer lines. A gravity sanitary sewer main line shall be constructed by Big Wave complying with GSD standard specifications and details and run approximately 1,900 ft. north along the Airport Street right-of-way from the existing manhole at Airport Street and Stanford Avenue to the northern limit of the northern parcel (Figure 8). GSD currently estimates the required size of this sewer main to be 8 inches in diameter, but the final system and sizing shall be based on a detailed sewer system design and analyses both satisfying GSD. On the south parcel, a 6-inch sewer line shall be constructed from the boat storage restroom to the Airport Street sewer main.

Wastewater generation rates for the developed uses are commensurate with water demand shown in Table 6 and is estimated to be 9,765 gpd.

The CDP issued by the County would be conditioned to require:

- 1) Amendment after noticed public hearing if any use or structure is significantly increased or intensified, with significance to be determined by the County and GSD; and
- 2) Notice at least 30 days prior to said Amendment to all Responsible Agencies; and
- 3) Approval by Responsible Agencies GSD and MWSD if water usage as metered for the Project CDP as amended exceeds 9765 gpd and confirmation of authority for such Responsible Agencies to require additional mitigation measures, charges or fees reasonably related to water service by MWSD and sewer and/or garbage and recycling service by GSD.

Garbage Service: Big Wave shall subscribe to and pay for garbage and recycling collection and disposal services to the Office Park and Wellness Center provided by the GSD (which is currently provided via a franchise agreement with Recology of the Coast). Big Wave shall incorporate solid waste reduction measures and comply with GSD District Code provisions regarding garbage and recycling service (currently found in Article III), as well as any applicable State or Federal Law related to garbage and recycling and diversion from the solid waste stream. Dumpster bins would be located within enclosed garbage areas within proposed building footprints. Mitigation Measure UTIL-11 provides for waste separation bins on-site during construction to facilitate recycling of project construction materials. Applicant would prepare a recycling program to collect recyclable materials (paper, metal, glass, and other materials) in Office Park and Wellness Center.

Power and Gas Service: Power and gas service would be provided by Pacific Gas and Electric (PG&E). Gas would be provided via a 2-inch line from north on Airport Street and tie into the north parcel (Figure 8). Electricity would be undergrounded to the site from the nearest utility pole at the corner of Stanford Avenue and Airport Street using the public joint utility trench along Airport Street (Figure 8). Power to the project site would be tied into the north parcel.

Project buildings would be heated using solar power.

2.3.7 Fire Protection and Flow Requirements

All Big Wave NPA buildings would be designed as Class 1 fire resistant (constructed from steel and concrete). According to the San Mateo County Deputy Fire Marshal, this designation would allow the peak fire flow requirement to be less than 2,000 gpm. To achieve this flow rate, Big Wave NPA would provide a 100,000 to 200,000 gallon storage tank located under Wellness Center Building 3 (see floor plan in Attachment A) with automatic booster pumps. The tank would be integrated into the MWSD system and filled by MWSD water supplies.

The pumps would be powered by a 150 kw engine (smaller than the 600 kw engine described in the 2010 EIR but also serving the same purpose) and deliver a minimum of 2,000 gallons per minute (gpm) at 60 pounds per square inch (psi). The engine exhaust would be completely silenced and scrubbed by discharging it below the parking lot gravel through an infiltration chamber. The tank would be constructed from a minimum of 8-inch concrete walls and water sealed slab located approximately on the existing grade within the footprint of Wellness Center Building 3 (no additional excavation is required). The tank would be pier supported and range in depth between 3.5 feet and 5 feet deep. The elevations and exteriors of Building 3 would not be changed. The booster pumps and engine would be located within the building footprint. All fire and water utilities would be the same as shown on the Utility Plan (Figure 8 and Figure 9).

A detailed fire system design and analyses satisfying both MWSD and the San Mateo County Fire Department would be required as part of the building permit process. The fire sprinkler zones and hydrants would be sized to match the required fire flow.

2.3.8 Emergency Response Plan

The Big Wave NPA project site is located within the coastal zone potentially subject to inundation from tsunamis. In the event of a tsunami, Big Wave would coordinate evacuation with the County Sheriff's Office of Emergency Services and Homeland Security (OES). The proposed project includes connection to the Telephone Emergency Notification System and San Mateo County Alert warning system. Big Wave would purchase EAS radio(s) and provide automatic broadcasting. Big Wave would integrate its Public Address and fire alarm system into the San Mateo County Alert system.

A Tsunami Evacuation Plan would be submitted to County OES for review and approval. The evacuation plan would include a planned and organized evacuation by foot to a zone located approximately 2,500 feet to the north that is outside of the current evacuation zone. The applicant would conduct biannual evacuation training exercises to respond to both local source and distance source tsunami scenarios. During these exercises, supplies would be brought to enable a comfortable and safe place within the evacuation zone until the return order is given. All equipment would be preloaded in hand carts. Longer-term evacuation would be staged in an orderly manner from this zone. The same type of evacuation would be exercised for fire and major earthquakes.

All project structures would be designed for vertical evacuation. All buildings are pier-supported steel structures with wave energy dissipation. The second floor of the structures would exceed the height of the inundation zone. The office buildings would be designed to comply with FEMA P646/June 2008 and all evacuations would be vertical. The Wellness Center would also be designed for this standard, but would evacuate by foot to the designated zone to plan for a combined fire or tsunami evacuation.

2.4 CONSTRUCTION PHASING

Big Wave NPA project construction would occur over a 15-year period in four phases as shown in Figure 11. All Wellness Center buildings with associated parking, boat storage area, and designated coastal access parking on the south parcel would be constructed within the first five years in Phase 1. Office Park Buildings C, D, and E and associated parking would be built in Phase 2, Years 5-8. Office Park Buildings A and B and associated parking would be built in Phase 3, Years 8-15. Phasing timeframes for the Office Park buildings are approximate and based on demand. Landscape planting within the wetland buffer area on the south parcel would be installed in Phase 1. Landscape planting within the wetland buffer area on the north parcel would be installed in Phase 3 and Phase 4, Years 8-15.

2.5 REQUIRED APPROVALS

2.5.1 San Mateo County

The following approvals are required by the County of San Mateo.

- 1) Approval of an Addendum to the certified Big Wave Wellness Center and Office Park Project EIR, pursuant to the California Environmental Quality Act (CEQA).
- 2) Use Permit for the modern sanitarium component of the Wellness Center and its accessory uses, Outdoor Boat Storage Use on the southern parcel, and proposed parking uses to be located within the Airport Overlay (AO) Zoning District.
- 3) Major Subdivision: The north parcel (APN 047-311-060) would be subdivided into 7 lots (Lots 1-7). Lot 1 includes the common areas of the wetlands, wetland buffer areas, area proposed for wetland habitat creation, and fire trail. Lots 2 through 6 would contain one building for each lot and Building A, owned by the Wellness Center. Lot 7 includes the 3-building Wellness Center.

- 4) Minor Subdivision: The south parcel (APN 047-312-040) would be subdivided into two lots (Lots 1-2). Lot 1 would contain outdoor boat storage and a designated archaeological site reserve area. Lot 2 would remain undeveloped.
- 5) Coastal Development Permit, appealable to the CCC, for proposed uses, structures and associated grading, related water and sewer service, wetland habitat and other landscaping, and fencing.
- 6) Design Review Permit for proposed structures and associated grading;
- 7) Grading Permit to perform 735 yds³ of cut (for utility trenching) and 21,400 yds³ of fill (gravel import).
- 8) Adoption of an ordinance approving the execution of a Development Agreement with the County of San Mateo to allow for phasing of project construction over 15 years.

Required non-discretionary actions by the County include issuance of encroachment permits for sewer and water lines, approval of landscaping on County-owned land within wetland buffer, and approval of an Operation and Maintenance Agreement for maintenance of on-site storm drainage systems.

2.5.2 Responsible Agencies

The following agencies have approval authority over the Big Wave NPA project and are considered responsible agencies under CEQA.

San Mateo County Local Agency Formation Commission (LAFCo): Connection to MWSD requires LAFCo to approve a sphere of influence amendment removing the project property from the Coastside County Water District (CCWD) sphere and placing it in the MWSD sphere to allow extension of water service outside MWSD current boundaries pursuant to Government Code Section 56133.

Montara Water and Sanitary District (MWSD): At present, the Big Wave project parcels are neither in the jurisdiction nor the sphere of influence of MWSD. However MWSD has stated it would provide water for domestic use and fire suppression to Big Wave and has the capacity to do so (see Section 2.3.6). Connection to MWSD for domestic water use and fire suppression requires MWSD application by resolution to San Mateo County LAFCo to amend its water service boundary. The application would include a Plan for Providing Service pursuant to Government Code Section 56653 detailing how water service would be provided, the capital improvements needed, and how the service would be funded. Utility improvements needed to serve the site are described in Section 2.3.6 above.

In accordance with Government Code Section 56133, Big Wave and MWSD anticipate entering into an Extra-Territorial Service Agreement and MWSD would apply to LAFCo for approval of extension of water service outside jurisdictional boundaries in conjunction with, and in addition to, an amendment to the MWSD sphere of influence to place the Big Wave property within the MWSD sphere of influence. This action would occur subsequent to County approvals identified in Section 2.5.1.

Granada Sanitary District (GSD): Connection to GSD for sewer service requires GSD approval of a Sewer Connection Permit for wastewater collection and treatment. Utility improvements needed to serve the site are described in Section 2.3.6 above.

Regional Water Quality Control Board (RWQCB): Site grading requires RWQCB approval of a Storm Water Pollution Prevention Plan (SWPPP) for control of storm water drainage during project construction.

California Coastal Commission (CCC): The CCC has approval authority over the Coastal Development Permit if an approval decision by County Board of Supervisors is appealed. The Coastal Development Permit is described in Section 2.5.1, Item 5.

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Chapter 3. CEQA Review Findings

The following information was considered pursuant to CEQA Guidelines §15162(a) and forms the basis of the County's decision to prepare an EIR Addendum for the Big Wave NPA.

3.1 PROJECT CHANGES

Proposed project changes are identified in Project Description, Chapter 2. As shown in Chapter 4, Environmental Impact Assessment, none of the proposed project changes would result in new significant impacts or substantially more severe impacts. The environmental impacts associated with changed project features would remain substantially the same as or less than the levels described in the 2010 EIR. No new impact mitigation is required as a result of project changes. A full discussion of the changes is presented in Chapter 4.

3.1.1 Project Changes Covered by 2010 EIR

The Big Wave NPA project is a reduced-scale version of the original proposal. Several project characteristics originally proposed and evaluated in the 2010 EIR have been removed from the Big Wave NPA project (Chapter 2). As a result, many environmental impacts identified in the EIR, have been reduced or no longer apply to the Big Wave NPA project. An overview of the reduced or eliminated impacts is presented below.

Aesthetics. Maximum building heights are reduced from 51 to 38 feet and the number of office buildings is reduced from eight to five. No Office Park or Wellness Center buildings are proposed on south parcel while most of the land would remain undeveloped. The visual character of the site is more fully retained by a significant reduction in the proposed density. New visual simulations of project development prepared by Environmental Vision show that skyline views of Pillar Ridge from community vantage points are not interrupted by project buildings.

Agriculture. No Office Park or Wellness Center buildings are proposed on the south parcel. Roughly three acres of land on the south parcel would remain undeveloped, allowing for continued agricultural use by the Wellness Center as organic gardening. Loss of land available to agriculture is thereby reduced.

Air Quality. Reduced office space translates into fewer buildings and parking spaces. Exhaust emissions from construction equipment and Office Park employee vehicles are reduced. A reduction in project grading from 22,445 cubic yards of cut and 26,050 cubic yards of fill to 735 cubic yards of cut and fill with 21,400 cubic yards of gravel import would reduce air pollutants, including dust, associated with earth movement. Elimination of the on-site wastewater treatment plant (Membrane Bioreactor) further removes an emission source from the project.

Biology. The development footprint is reduced, resulting in increased setback distances from the Pillar Point Marsh wetland from 100 to 150 feet to 250 feet on the north parcel. Fewer buildings, smaller parking areas, and increased wetland setbacks reduce the potential for polluted runoff to enter wetlands. Eliminating use of recycled wastewater on-site eliminates potential for saturated soils to indirectly affect biological resources of Pillar Point Marsh by altering the quantity or quality of drainage entering the marsh.

Cultural Resources. Archaeological resources on the south parcel continue to be protected as undeveloped land that would be owned and managed by the Wellness Center.

Geology and Soils. Rough grading and disturbance of project soils have been reduced from 22,445 cubic yards of cut and 26,050 cubic yards of fill to 735 cubic yards of cut and fill with 21,400 cubic yards of gravel import. Potential for soil erosion and loss of topsoil is reduced. Same site conditions of expansive soil and seismic risks occur.

Climate Change. Reduced emission sources identified in Air Quality reduce greenhouse gases emissions. The project retains the requirement to be a LEED certified project.

Hazards. Residential units in Wellness Center buildings are moved to second floor elevations. Exposure of Wellness Center residents to potential tsunami wave run-up is reduced by raising residential units above the potential maximum wave height.

Hydrology/Water Quality. Elimination of wastewater recycling from the project removes potential need to load project soils with recycle water and the potential effect on the high ground water table. The amount of impervious and pervious surfaces is reduced by fewer buildings and reduced parking spaces resulting in reduced volume of stormwater water runoff. Potential water quality issues associated with use of treated wastewater on-site are eliminated.

Land Use. Project changes reduce conflicts with Local Coastal Program policies concerning public services, traffic and public access, protection of wetland and sensitive habitats, visual resources, and hazards. Project changes eliminate a public commercial storage building from the portion of the project property within the Half Moon Bay Airport Overlay Zone.

Noise. Noise from project construction activity, mechanical equipment on building rooftops, and project vehicle traffic are all reduced commensurate with the reduced scale in development.

Population/Housing. Reduced project scale reduces the number of Office Park employees on the project site resulting in a slightly reduced potential demand for project-related housing.

Public Services and Recreation. Demand for services is reduced commensurate with the reduction in project scale.

Traffic. An updated traffic report prepared by Hexagon Transportation Consultants indicates the change in project scale, specifically the reduction in office space from 225,000 sq. ft. to 189,000 sq. ft. results in fewer project vehicle trips: from 2,123 daily trips to 1,479 daily trips. The adopted mitigation measure addressing improvement of the Capistrano Road and Highway1 intersection is still necessary.

3.1.2 Project Changes Not Covered in EIR

The Big Wave NPA project proposes several modifications not previously addressed by the certified 2010 EIR. These changes include:

- Boat storage use on south parcel.
- Reconfiguration of subdivision lots.
- Import of 21,400 cubic yards of gravel fill for building and parking areas.
- Connection to MWSD for water supply.
- Reduced term of project phasing.

An environmental analysis of these changes is presented in Chapter 4.

3.2 CHANGES IN CIRCUMSTANCES

There are no new circumstances involving new significant impacts or substantially more severe impacts. No substantial changes to baseline conditions used in the 2010 EIR have been identified. Specifically, there have been no substantial changes in environmental setting determined through field survey, air basin attainment status, record search of biological data bases, geologic investigation, county land use applications, and traffic counts. As a result, the impacts of Big Wave NPA project remain reflective of those described in the certified EIR. No changes in baseline conditions have occurred to cause an increase in significance or severity of project impacts as documented in Chapter 4.

3.3 NEW INFORMATION

New information has been made available since certification of the 2010 EIR in the form of new regulations, plans, or policies governing the Big Wave project or its impacts. An overview of this

information is briefly presented below and considered fully in Chapter 4. The new information does not result in new significant impacts or increase the severity of known significant impacts, nor does it alter the feasibility of project mitigation or alternatives.

- 1) San Mateo County Local Coastal Program (LCP) Amendment. New and amended LCP policies were adopted by the California Coastal Program in August 2012. Project conformance with LCP policies is summarized in the Environmental Impact Assessment Chapter (Section 4.10) and discussed fully in Attachment D.
- 2) Half Moon Bay Airport Land Use Compatibility Plan (ALUCP). The Draft Final of a Revised ALUCP was released in August 2013. However, this revised ALUCP does not become effective until adopted by the Airport Land Use Commission. The updated ALUCP includes a provision recognizing that projects with applications deemed complete prior to the adoption of the revised ALUCP remain subject to the existing ALUCP, adopted in 1996. The Big Wave NPA project is a complete application, and therefore, if the current version of the Draft Revised ALUCP is adopted, the project would be grandfathered and remain subject to the 1996 ALUCP.
- 3) Princeton Plan: Community Plan, Local Coastal Program, and Zoning Regulation Update. The development of the Princeton Plan is in progress and the County has determined that it will process the Big Wave NPA project independently of the Princeton planning process. An Existing Conditions Report was completed May 2014. No draft planning document is available yet for review. No new policies have been established which would result in new land use conflicts for the project.
- 4) San Mateo County Energy Efficiency Climate Action Plan (EECAP). The San Mateo County EECAP is a Bay Area Air Quality Management District (BAAQMD)-defined qualified GHG Reduction Plan supported in part by the County's General Plan Energy and Climate Change Element. EECAP was adopted by the County in June 2013. Project compliance with the EECAP development performance is discussed in Environmental Impact Assessment, Section 4.7.
- 5) San Mateo County Initial Study Environmental Evaluation Checklist. The County updated its checklist February 26, 2013. The new checklist is used as the basis of the Environmental Impact Assessment in Chapter 4.
- 6) Bay Area Air Quality Management District (BAAQMD) CEQA Air Quality Guidelines. In May 2011, the BAAQMD published new, more stringent significance thresholds and different impact assessment methodologies for assessing air quality impacts. The BAAQMD is currently not recommending use of the new thresholds due to legal challenge and a change in methodology is not considered substantial new information (Section 4.3, Response 3.b). The new guidance updates the list of Best Management Practices (BMPs) required for projects to mitigate construction dust emissions, resulting in a minor change to EIR Measure AQ-2 as discussed in Section 3.4 below and 4.3, Response 3.b). The BAAQMD's new CEQA Guidelines also use a lower significance threshold for evaluating greenhouse gas emissions. Project compliance with the EECAP is discussed in Section 4.7.

3.4 ADEQUACY OF EIR MITIGATION

Project changes and new information do not result in new significant environmental impacts that have not been previously disclosed in the certified 2010 EIR. Several mitigation measures in the certified 2010 EIR no longer apply to the project as they address project features which have been eliminated from the project design. Additionally, several measures have been amended to reflect changes in project features, project phasing, and Best Management Practices. The changes to these measures are minor. The certified EIR mitigation measures remain adequate to fully address project changes proposed by the Big Wave NPA; no new mitigation is required.

All applicable EIR mitigation text is shown in Attachment E. A summary of the EIR mitigation changes is presented below:

Mitigation Measure AQ-2: Construction Emissions

The BAAQMD Air Quality Guidelines contain updated Best Management Practices governing construction dust emissions (Environmental Impact Assessment, Section 4.3). EIR Measure AQ-2 specifically lists BMPs required by the BAAQMD. Since BAAQMD has updated its BMP list, EIR Measure AQ-2 is amended to reflect this minor change in information.

Mitigation Measure AQ-5: Sewage Treatment Odors

The project has eliminated on-site treatment of wastewater and use of recycle wastewater. Measure AQ-5 required engineering details regarding the odor control system. The measure is no longer required and is deleted.

Mitigation Measure CULT-2a: Archaeological Resources

The project has been redesigned to avoid archaeological resource CA-SMA-151. Measure CULT-2a contains language for excavation and curation of resource if avoidance is not feasible. This language is no longer required and the text is deleted accordingly.

Mitigation Measure HYDRO-5: Surface Water Runoff Quality

The project was redesigned prior to the Final EIR to eliminate use of rain gardens for controlling surface water runoff. Measure HYDRO-5 is amended to eliminate references to these structural BMPs.

Mitigation Measure HYDRO-6: Groundwater Quality

The project has eliminated use of the on-site well as a domestic water supply. Well water would be used for landscape irrigation, gardening, or agricultural uses only. Measure HYDRO-6 is revised accordingly.

Mitigation Measure TRANS-1: Intersection Level of Service and Capacity

Project changes reduce vehicle trip generation and shorten the phasing of Office Park construction. Measure TRANS-1 is amended to ensure traffic improvements are implemented prior to project occupancy and to include the consideration of a roundabout as an alternative to signalization per Caltrans requirements.

Mitigation Measure UTIL-2: Wastewater Collection System Capacity

The project has reduced its wastewater generation to limit its flow rate to a level that can be serviced by the existing 8-inch sewer main operated by GSD. Measure UTIL-2 is amended to require the applicant to file a complete Application with GSD, obtain a Sewer Connection Permit from GSD, and construct a gravity sanitary sewer main line complying with GSD standard specifications and details.

Mitigation Measure UTIL-4: Wastewater Recycling and Disposal Requirements

The project has eliminated on-site treatment of wastewater and use of recycle wastewater. Measure UTIL-4 requires compliance with State Health Board and RWQCB requirements. The measure is no longer required and is deleted.

Mitigation Measure UTIL-5: Wastewater and Recycling Water Flow Estimates

The project has eliminated on-site treatment of wastewater and use of recycle wastewater. Measure UTIL-5 requires a water budget analysis to assess sufficiency in flows for landscape irrigation and toilet flushing. The measure is no longer required and is deleted.

Mitigation Measure UTIL-6: Creek Crossing by Sewage Pipeline

The project has eliminated on-site treatment of wastewater. Wastewater flows on the north parcel would flow directly to a GSD sewer main on Airport Street and would no longer be directed in a pipeline to the south parcel for treatment. Measure UTIL-6 addresses the pipeline hydraulics crossing beneath the drainage. The measure is no longer required and is deleted.

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Chapter 4. Environmental Impact Assessment

The following analysis is provided as an Addendum to the certified Big Wave Wellness Center and Office Park EIR (2010 EIR) in order to address project changes proposed by the Big Wave NPA. The analysis is based on the County’s Initial Study Environmental Evaluation Checklist adopted by the County in February 2013. For each potential environmental effect, the checklist and subsequent discussion identifies:

- 1) Where the impact was previously addressed in the 2010 EIR;
- 2) Whether project changes would result in new significant impacts or substantially more severe significant impacts;
- 3) Whether any new circumstances exist which would change the conclusions of the 2010 EIR by introducing new significant impacts or substantially more severe significant impacts;
- 4) Whether any new information exists that could affect the conclusions of the 2010 EIR and require new analysis of verification; and
- 5) Whether the mitigation required in the 2010 EIR remains adequate to address project impacts.

Each discussion section provides an assessment of the Big Wave NPA project in comparison to the level of effects described in the certified EIR. New project components not previously considered in the EIR (CEQA Review Findings, Section 3.1.2) are addressed along with new regulations. Where applicable, EIR text amendments are presented directly in the discussion sections responding to each checklist question.

4.1 AESTHETICS

<i>Would the project:</i>					
	<i>Where Impact was Analyzed in 2010 EIR</i>	<i>Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?</i>	<i>Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?</i>	<i>Any New Information Requiring New Analysis or Verification?</i>	<i>Do 2010 EIR Mitigation Measures Address/Resolve Impacts?</i>
1.a. Have a significant adverse effect on a scenic vista, views from existing residential areas, public lands, water bodies, or roads?	Impact AES-1, DEIR pp. IV.A-20-26 Topical Response 1: Story Poles, FEIR pp. II-31-32 Topical Response 7: Visual Simulations, FEIR pp. II-52-53	No. Proposed changes reduce number and height of buildings and preserve undeveloped space by clustering of development on the north parcel. New boat storage use does not include visible structures of significance.	No.	Yes. The County’s Midcoast LCP Update was approved by the CCC in 2012. LCP Policies 8.5 and 8.6 governing visual resources were amended.	The 2010 EIR found Impact AES-1 to be less than significant. No mitigation was required. The Big Wave NPA project does not create new significant or more severe impacts. No new mitigation is required. The project is consistent with LCP policies concerning visual resources.

<i>Would the project:</i>					
	Where Impact was Analyzed in 2010 EIR	<u>Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?</u>	<u>Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?</u>	<u>Any New Information Requiring New Analysis or Verification?</u>	<u>Do 2010 EIR Mitigation Measures Address/Resolve Impacts?</u>
1.b. Significantly damage or destroy scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	Impact AES-2, DEIR p. IV.A-27	No. Proposed changes reduce number and height of buildings. Office Park and Wellness Center buildings would be clustered on the north parcel. Development on south parcel is replaced with a boat storage yard and undeveloped land for organic gardening.	No.	No.	The 2010 EIR found Impact AES-2 to be less than significant. No mitigation was required. The Big Wave NPA project does not create new significant or more severe impacts. No new mitigation is required.
1.c. Significantly degrade the existing visual character or quality of the site and its surroundings, including significant change in topography or ground surface relief features, and/or development on a ridgeline?	Impact AES-3, DEIR pp. IV.A-20-2 Topical Response 1: Story Poles, FEIR pp. II-31-32 Topical Response 7: Visual Simulations, FEIR pp. II-52-53	No. Proposed changes reduce number and height of buildings, project scale, cluster buildings on the north parcel, and eliminate grading for building pads and parking areas.	No.	Yes. The County's Midcoast LCP Update was approved by the CCC in 2012. LCP Policies 8.5 and 8.6 governing visual resources were amended.	The 2010 EIR found Impact AES-2 to be less than significant. No mitigation was required. The Big Wave NPA project does not create new significant or more severe impacts. No new mitigation is required. The project is consistent with LCP policies concerning visual resources.
1.d. Create a new source of significant light or glare that would adversely affect day or nighttime views in the area?	Impact AES-4, DEIR p. IV.A-28	No. Proposed changes reduce light sources due to fewer buildings and parking spaces. Light impacts would be clustered on the north parcel.	No.	No.	The 2010 EIR found Impact AES-4 to be potentially significant. Measure AES-4 required the submittal of a lighting plan to reduce the effects of night lighting and glare to less than significance. The Applicant has submitted a lighting plan for the NPA project consistent with Measure AES-4. This measure fully addresses impacts

<i>Would the project:</i>					
	Where Impact was Analyzed in 2010 EIR	<u>Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?</u>	<u>Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?</u>	<u>Any New Information Requiring New Analysis or Verification?</u>	<u>Do 2010 EIR Mitigation Measures Address/Resolve Impacts?</u>
					associated with project changes. No new mitigation is required.
1.e. Be adjacent to a designated Scenic Highway or within a State or County Scenic Corridor?	Impact AES-2, DEIR pp. IV.A-5, 27 Topical Response 1: Story Poles, FEIR pp. II-31-32 Topical Response 7: Visual Simulations, FEIR pp. II-52-53	No. Proposed changes reduce number and height of buildings visible from Highway 1 and preserves undeveloped land for organic gardening through clustering of development.	No.	Yes. The County's Midcoast LCP Update was approved by the CCC in 2012. LCP Policy 8.5 governing visual resources was amended.	The 2010 EIR found Impact AES-2 to be less than significant. No mitigation was required. The Big Wave NPA project does not create new significant or more severe impacts. No new mitigation is required. The project is consistent with LCP policies concerning visual resources.
1.f. If within a Design Review District, conflict with applicable General Plan or Zoning Ordinance provisions?	Impact LU-2, DEIR pp. IV.A-15-18; IV.I-23-27, 35-37	No. Proposed changes reduce number and height of buildings, reduce parking spaces, cluster buildings, and reduce grading.	No.	No.	The 2010 EIR found Impact LU-2 to be less than significant. No mitigation was required. The Big Wave NPA project does not create new significant or more severe impacts. No new mitigation is required.
1.g. Visually intrude into an area having natural scenic qualities?	Impact AES-1 and AES-3, DEIR pp. IV.A-20-27 Topical Response 1: Story Poles, FEIR pp. II-31-32 Topical Response 7: Visual Simulations, FEIR pp. II-52-53	No. Proposed changes reduce number and height of buildings, reduce parking spaces, cluster buildings, and reduce grading.	No.	No.	The 2010 EIR found Impacts AES-1 and AES-3 2 to be less than significant. No mitigation was required. The Big Wave NPA project does not create new significant or more severe impacts. No new mitigation is required.

Environmental and Regulatory Setting:

The Aesthetics environmental and regulatory setting is presented in DEIR pp. IV.A-2 to IV.A-18. No changes to the viewshed or visual character of the site or surrounding area have occurred since the certification of the 2010 EIR. LCP policies governing visual resources are considered below.

Discussion:

Would the proposed project:

1.a. Have a significant adverse effect on a scenic vista, views from existing residential areas, public lands, water bodies, or roads?

The 2010 EIR addressed project impacts on public views and scenic vistas in Impact AES-1 (DEIR pp. IV.A-20-26; FEIR Vol I pp. II-52-53). The EIR determined the views to the east and west from the project site include both ridges and skylines which are identified by the General Plan as important aesthetic features. Visual simulations of the project development were prepared from five viewpoint locations. Partial or full views of the project site were available from these vantage points. Though views would be partially obstructed by project development, the 2010 EIR concluded that project impacts on views from Airport Street, Airport Street/Stafford Avenue, West Point Avenue, North Trail, and Highway 1 would not block views of Pillar Ridge or the forested hills. The impacts were determined to be less than significant and no mitigation was required.

The Big Wave NPA project is a reduced scale version of the Big Wave Project described in the 2010 EIR (see Project Description, Chapter 2). The maximum building height has been reduced from 51 to 38 feet, the number of office buildings has been reduced from eight to five, and much of the south parcel would be left undeveloped for use as organic gardening. The result is a reduction in development density and overall building mass. The buffer along the wetland boundary has been increased on the north parcel from 100 feet to between 150 and 250 feet. The wetland buffer on the south parcel remains 100 feet but, now that development is clustered on the north parcel, the need to buffer the activities on the south parcel is reduced. As a result, the Big Wave NPA project has reduced visual impacts from those described in the 2010 EIR. Project changes do not result in new significant visual impacts or more severe significant impacts.

New Visual simulations of the Big Wave NPA revised site plan and building elevations were prepared by Environmental Vision (Attachment F). Project views are simulated from five viewpoint locations: Airport Road, Highway 1, Capistrano Road, Radio Tower, and Pillar Point Bluff. Simulations represent views at each viewpoint location at two future points in time: immediately at project completion and 15 years from project completion when landscape vegetation has matured. A description of the methodology used to create the visual simulations is included with the simulations in Attachment F.

The visual simulations demonstrate that the Big Wave NPA project's effect on a scenic vista, or views from existing residential areas, public lands, water bodies, and roads would be similar to or less than those described in the 2010 EIR.

Viewpoint 1: Airport Road. Office Park buildings would be visible until maturation of screening trees planted along the Airport Road frontage and parking lot (see Figure 5, Landscaping Plan). Views of the skyline along Airport Road would be blocked from viewers when passing in front of the Office Park development. Mature landscaping trees at 15 years from the date of project completion would provide nearly complete screening of buildings.

Viewpoint 2: Highway 1. Views of the Pillar Ridge ridgeline as viewed along the Highway 1 scenic corridor would not be blocked by buildings. Views of Pillar Point, the forested hills, and the skyline would not be obstructed for motorists traveling north and

southbound on Highway 1. Mature landscaping trees at 15 years from the date of project completion would provide partial screening of buildings.

Viewpoint 3: Capistrano Road. Office Park buildings are visible against the forested backdrop of Pillar Ridge. Mature landscaping trees at 15 years from the date of project completion would provide partial screening of the office buildings.

Viewpoint 4: Radio Tower. Office Park and Wellness Center buildings are clearly visible from the Radio Tower. Development is clustered on the north end of the north parcel. Development is setback from Pillar Point Marsh. Mature landscaping at 15 years from the date of project completion would partially screen and soften views of the buildings and parking areas.

Viewpoint 5: Pillar Point Bluff. Office Park and Wellness Center buildings are visible from the trail segment leading from the Pillar Point Bluff parking lot up to the Jean Lauer Trail. The Pillar Ridge Manufactured Home Community in the view foreground screens the lower floors of the project buildings. Mature landscaping trees at 15 years from the date of project completion would partially screen and soften views of the buildings and parking areas.

The Big Wave NPA project includes a boat storage area proposed on the south parcel is a project change not previously assessed in the 2010 EIR. The use of the site for commercial storage of marine vessels is consistent with the Waterfront Zoning District (see Land Use, Section 4.10). The boat storage area would be surrounded by screened security fencing. The boat storage yard would be adjacent to commercial warehouses on adjoining properties and would create a visual extension of this industrial/commercial warehouse complex. The boat storage yard does not include structures other than a small restroom and therefore does not involve development features that would block views of Pillar Ridge from community viewpoints.

The project was reviewed by the Coastside Design Review Committee (CDRC) on July 10, 2014, whereby the CDRC made recommendations for minor changes to landscaping, grading, and architecture to increase compatibility with site topography and adjacent development. These changes and the applicant's response to requests for additional information will be reviewed at the CDRC Meeting of September 11, 2014. Modifications requested by the CDRC are minor in nature, reduce visual impacts, and further conform the project to the County design standards. The project has gone through the County's design review process.

Since certification of the 2010 EIR, the County LCP Policies 8.5 and 8.6 pertaining to visual resources have been amended. A comprehensive review of LCP visual resource policies by the County is presented in Attachment D. The analysis found that while the project would substantially change the visual character of the site and be visible from public viewpoints, it would be consistent with LCP Policies 8.5 and 8.6. Ridgeline views are not interrupted and site design features are incorporated to minimize the visual impact of the project.

The Big Wave NPA project would not result in a new significant or more severe impact than that identified in the 2010 EIR, and there are no new circumstances or information that require the evaluation of new mitigation measures or alternatives.

1.b. Significantly damage or destroy scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

The 2010 EIR addressed project impacts on scenic vistas and local views in Impact AES-2 (DEIR pp. IV.A-27). The 2010 EIR determined the project is located within the viewshed of Highway 1, a County-designated scenic corridor. The project site is located on land that has been utilized for agricultural crop production and does not contain trees, rock outcroppings, or historic buildings. The EIR concluded the impact was less than significant and no mitigation was required. The Impact to public views from Highway 1 is also addressed in Impact AES-1 (see Response 1.a.).

The Big Wave NPA project changes would not damage or destroy scenic resources. The Big Wave NPA project would not result in a new significant or more severe impact than that identified in the 2010 EIR, and there are no new circumstances or information that require the evaluation of new mitigation measures or alternatives. See Response 1.a. for a discussion of impact on public views from Highway 1 and Response 1.e. for discussion of impact on a Highway 1 as a County designated scenic corridor. The Big Wave NPA project would not result in a new significant or more severe impact than that identified in the 2010 EIR, and there are no new circumstances or information that require the evaluation of new mitigation measures or alternatives.

1.c. Significantly degrade the existing visual character or quality of the site and its surroundings, including significant change in topography or ground surface relief features, and/or development on a ridgeline?

The 2010 EIR addressed project impacts on scenic vistas and local views in Impact AES-3 (DEIR pp. IV.A-27; FEIR pp. II-52-53). The EIR determined the visual character of the site would be changed by development of office and residential buildings, a community center, storage facilities, and parking lots. The maximum building heights on the project site of 45.5 feet (three stories) would be taller than the adjacent residences at the Pillar Ridge Manufactured Home Community. However, the use of setbacks, landscaped buffers, and building placement of the taller Office Park structures would not result in a significant incompatible aesthetic relationship with surrounding uses. Views of the project development were simulated from five locations (DEIR Figure IV.A-2 and Figures IV.A-4 through IV.A-8). The 2010 EIR concluded the visual change in character was not a substantial degradation. Additionally, the project is required to comply with governing County General Plan and LCP policies, County Zoning Regulations (Design Review District) and the County Community Design Manual. Therefore, the impact was considered to be less than significant and no further mitigation was required.

The Big Wave NPA project would not result in a significant change of topography, ground surface relief features or development on a ridgeline. The analysis found that while the Big Wave NPA project would substantially change the visual character of the site and be visible from public viewpoints, it includes site design features such as landscaping, 165-foot setback from the street, and clustering of development, aimed at minimizing the visual impact of the project. The Big Wave NPA project would not result in a new significant or more severe impact than that identified in the 2010 EIR, and there are no new circumstances or information that require the evaluation of new mitigation measures or alternatives.

See Response 1.a. and 1.e. for discussion of project consistency with LCP Policies 8.5 and 8.6.

1.d. Create a new source of significant light or glare that would adversely affect day or nighttime views in the area?

The 2010 EIR addressed project impacts on scenic vistas and local views in Impact AES-4 (DEIR pp. IV.A-28-29). The project lighting sources, as described in the 2010 EIR, include street lights; security lights (buildings, walkways, and parking), building interior lights, and vehicle headlights. The exterior building materials include siding and stucco and minimize reflective glare. The 2010 EIR identified Measure AES-4 to reduce impacts associated with light and glare (Attachment E). With implementation of this measure, the 2010 EIR concluded project impacts were less than significant.

The Big Wave NPA is a reduced project and moves structural development to the north parcel. Night lighting would be primarily concentrated on the north parcel with lighting on the south parcel limited to the perimeter of the boat storage yard. Fewer Office Park buildings and parking spaces reduce the overall number of light sources at the project site. Light and glare impacts would be similar to or slightly reduced from levels described in the 2010 EIR. Measure AES-4 would continue to fully address lighting impacts of the Big Wave NPA project. No new mitigation is required.

The Applicant has prepared a lighting plan which is undergoing review by the CDRC for consistency with applicable Design Review standards (see Response 1.a.). The Big Wave NPA project would not result in a new significant or more severe impact than that identified in the 2010 EIR, and there are no new circumstances or information that require the evaluation of new mitigation measures or alternatives.

1.e. Be adjacent to a designated Scenic Highway or within a State or County Scenic Corridor?

The 2010 EIR addressed project impacts on Highway 1, a County-designated scenic corridor in Impact AES-1 (DEIR pp.IV.A-20-26; See Response 1.a.). The project site is visible from Highway 1, a County-designated scenic corridor, and is located within the County Coastal Zone Scenic Corridor. The 2010 EIR concluded that views of the project site from this location constitutes a small portion of the field of view, and while the project development would be noticeable, it would not affect the overall value of the views of Pillar Point, the forested hills, and the skyline. The 2010 EIR determined the impact was less than significant and no mitigation was required.

The Big Wave NPA revised site plan project clusters the buildings and parking areas on the north parcel closest to existing development (Pillar Ridge Manufactured Home Community). The building heights have been lowered and now range from 22 to 33 feet in height (Section 2.3.1, Table 3) making it easier to screen from view with landscaping. The south parcel would be largely undeveloped to allow for agricultural (organic gardening) use except for the proposed 1.12 acre boat storage facility. The boat storage yard is placed at the corner of Airport Road and Stanford Avenue and is close to existing industrial development on Stanford Avenue. Wetland and riparian zone buffers on the north parcel have been increased from 100 feet to 150 feet adjacent to Pillar Marsh and 250 feet adjacent to the drainage swale existing between the north and south parcels.

Visual simulations of the Big Wave NPA project from Highway 1 (Attachment F, Viewpoint 2) show that Office Park buildings would not block views of Pillar Ridge. Views of Pillar Point, the forested hills, and the skyline would not be obstructed for motorist traveling north and southbound on Highway 1. The visual analysis of the Big Wave NPA project confirms the views of the project site from this roadway segment constitute a small portion of the field of view, and while development on the project would be noticeable, the project would not affect the overall value of the views from this roadway. The boat storage yard and fencing would be minimally visible from Highway 1 and less visible than the buildings on the south parcel described in the 2010 EIR.

The overall effect of project changes proposed by the Big Wave NPA is to reduce the visual impact of the project to levels below those analyzed in the 2010 EIR. The Big Wave NPA project would not result in a new significant or more severe impact than that identified in the 2010 EIR, and there are no new circumstances or information that require the evaluation of new mitigation measures or alternatives.

LCP Policy 8.5 requires new development to be located on a portion of the parcel where the development is least visible from State and County Scenic Roads, is least likely to significantly impact view from public viewpoints, be consistent with all other LCP requirements, and best preserve the visual and open space qualities of the parcel overall. If the entire property being subdivided is visible from State and County Scenic Roads, or other public viewpoints, the policy requires that new parcels have building sites that minimize visibility from those roads and other public viewpoints. The County has found the project consistent with LCP Policies 8.5 and 8.6 governing scenic resources (Attachment D).

1.f. If within a Design Review District, conflict with applicable General Plan or Zoning Ordinance provisions?

The 2010 EIR addressed project consistency with Design Review District standards in Impact LU-2 (DEIR pp. IV.A-15-18; IV.I-23-27, 35-37). The 2010 EIR determined the project is located in the Design Review Zoning District. The project was found consistent with Design Review standards and the EIR concluded the impact was less than significant. No mitigation was required.

The Big Wave NPA project was reviewed by the Coastside Design Review Committee on July 10, 2014, whereby the CDRC made recommendations for minor changes to landscaping, grading, and architecture to increase compatibility with site topography and adjacent development. These changes and the applicant's response to requests for additional information will be reviewed at the CDRC Meeting of September 11, 2014. Modifications requested by the CDRC are minor in nature, reduce visual impacts, and further conform the project to the County design standards.

The Big Wave NPA project would not result in a new significant or more severe impact than that identified in the 2010 EIR, and there are no new circumstances or information that require the evaluation of new mitigation measures or alternatives.

1.g. Visually intrude into an area having natural scenic qualities?

The 2010 EIR addressed project impacts on natural scenic qualities in Impact AES-1 and Impact AES-3. The EIR identified that the project site is located at the base of Pillar Point Ridge and immediately adjacent to Pillar Point Marsh and is visible from a County designated Scenic Route and other public viewing locations. Although there is existing development both north and south of the project site it is in an area recognized for its scenic qualities. As discussed in Responses 1.a. and 1.c, the EIR concluded the impact of the project on scenic qualities of the area is less than significant and no mitigation was required.

While the Big Wave NPA project would lessen the intrusion caused by the 2010 project, it would still result in the development of a currently undeveloped parcel with scenic qualities and would be a noticeable change over existing conditions. The project would not greatly alter existing topography or block ridgeline views but the buildings would be clearly visible from Highway 1, other vicinity roads, and trail segments along Pillar Point Ridge. The screening value of the landscaping would improve over time as it matures but, in the early years of the project, the landscaping would provide little screening. Once landscaping matures enough to substantially screen the project buildings from view, at approximately 15 years from project completion, the visual intrusion of the project would not be significant. The project would not block views of the ocean, shoreline, skyline, or ridgelines from most viewpoints. The skyline is blocked from Airport Street along the north parcel (see Attachment F, Viewpoint 1).

The Big Wave NPA project changes do not introduce new significant impacts or increase the severity of significant impacts described in the EIR. There are no new circumstances or information that require the evaluation of new mitigation measures or alternatives.

Sources:

California Coastal Commission. 2012a. W16a Staff Report: Appeal – Substantial Issue and De Novo. Application No. A-2-SMC-11-021. Applicant: Big Wave Group, LLC. Appellants: Committee for Green Foothills, Surfrider Foundation – San Mateo County and Loma Prieta Chapters, Sierra Club, Pillar Ridge Homeowners Association, San Mateo County League for Coastside Protection, Granada Sanitary District, Commissioners Steve Blank and Marry Shallenberger. Staff Report: July 27, 2012. Hearing Date: August 8, 2012.

California Coastal Commission. 2012b. Staff Report Addendum for Item W16a. Coastal Development Permit No. A-2-SMC-11-021 (Big Wave Group, LLC, Princeton by the Sea, San Mateo County). Prepared August 7, 2012 for Hearing Date August 8, 2012.

Christopher A. Joseph & Associates. 2009. Big Wave Wellness Center and Office Park Draft Environmental Impact Report. SCH No. 2008102109. October 2009.

Christopher A. Joseph & Associates. 2010. Big Wave Wellness Center and Office Park Final Environmental Impact Report. SCH No. 2008102109. October 2010.

County of San Mateo. 2011. Inter-Departmental Correspondence. Planning and Building Department to Board of Supervisors. Consideration of: (1) the certification of an Environmental Impact Report (EIR) consisting of a Draft EIR (DEIR) and a Final EIR (FEIR), (2) a Use Permit, (3) a Major Subdivision, (4) a Coastal Development Permit, (5) a Design Review Permit, (6) a Grading Permit, and (7) adoption of an Ordinance approving the execution of a Development Agreement with the County of San Mateo, for the Big Wave Wellness Center and Office Park proposed on two undeveloped parcels (APN 047-311-060 and APN 047-312-040) located in the unincorporated Princeton-by-the-Sea area of San Mateo County. March 1, 2011. Board Meeting Date March 15, 2011.

County of San Mateo. 2013. Local Coastal Program Policies. June 2013.

Environmental Vision. 2014. Visual Simulation Methodology. Big Wave North Parcel Alternative. June 2014.

MacLeod and Associates. 2014a. Civil Engineering Drawings. Sheet C-1 Vesting Tentative Map for Commercial and Residential Purposes "Big Wave". Sheet C2 Grading and Drainage Plan with Permanent Storm Water Controls. Sheet C-3 Utility Plan. Sheet C4 Sediment and Erosion Control Plan. Sheet C5 Detail Sheet. June 30, 2014.

MacLeod and Associates. 2014b. Big Wave Landscaping Plan.

4.2 AGRICULTURAL AND FOREST RESOURCES

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the State's inventory of forestland, including the Forest and Range Assessment Project and the Forest Legacy Assessment Project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. *Would the project:*

	<i>Where Impact was Analyzed in 2010 EIR</i>	<i>Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?</i>	<i>Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?</i>	<i>Any New Information Requiring New Analysis or Verification?</i>	<i>Do 2010 EIR Mitigation Measures Address/Resolve Impacts?</i>
2.a. For lands outside the Coastal Zone, convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	Impact AG-1, DEIR pp. IV.B-3-5, 9-10, 13, 14, 16-18 DEIR addressed impacts even though inside (not outside) the Coastal Zone.	No. Proposed changes create a 3.4-acre undeveloped lot on south parcel for use in organic gardening.	No.	No.	The 2010 EIR found Impact AG-1 to be less than significant. No mitigation was required. The Big Wave NPA project does not create new significant or more severe impacts. No new mitigation is required.
2.b. Conflict with existing zoning for agricultural use, an existing Open Space Easement, or a Williamson Act contract?	DEIR pp. IV.B-13-19; V-5	No. Proposed changes create a 3.4-acre undeveloped lot on south parcel for use in organic gardening.	No.	No.	The 2010 EIR does not contain farmland mitigation as no significant impacts were identified. The Big Wave NPA project does not create new significant or more severe impacts. No new mitigation is required.
2.c. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forestland to non-forest use?	Farmland: DEIR pp. IV.B-13, 14, 16-18, Impact AG-2 Timber: DEIR p. IV.B-6	No. Proposed changes create a 3.4-acre undeveloped lot on south parcel for use in organic gardening.	No.	No.	The 2010 EIR found Impact AG-2 to be less than significant. No mitigation was required. The Big Wave NPA project does not create new significant or more severe impacts. No new mitigation is required.

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the State's inventory of forestland, including the Forest and Range Assessment Project and the Forest Legacy Assessment Project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. *Would the project:*

	<i>Where Impact was Analyzed in 2010 EIR</i>	<i>Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?</i>	<i>Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?</i>	<i>Any New Information Requiring New Analysis or Verification?</i>	<i>Do 2010 EIR Mitigation Measures Address/Resolve Impacts?</i>
2.d. For lands within the Coastal Zone, convert or divide lands identified as Class I or Class II Agriculture Soils and Class III Soils rated good or very good for artichokes or Brussels sprouts?	DEIR pp. IV.B-5-9	No. Proposed changes create a 3.4-acre undeveloped lot on south parcel for use in organic gardening.	No.	Yes. The County's Midcoast LCP Update was approved by the CCC in 2012. LCP Policies 5.2 and 5.4 governing designation of parcels as Agriculture on the LCP Land Use Map were amended.	The 2010 EIR concluded agricultural impacts are less-than-significant and no mitigation was required. The Big Wave NPA project does not create new significant or more severe impacts. No new mitigation is required. Assessment of the new information (updated LCP policies) does not reveal new project impacts requiring mitigation.
2.e. Result in damage to soil capability or loss of agricultural land?	DEIR pp. IV.B-5-9, 13-14, 16-18	No. Proposed changes create a 3.4-acre undeveloped lot on south parcel for use in organic gardening.	No.	No.	The 2010 EIR concluded agricultural impacts are less-than-significant. No mitigation was required. The Big Wave NPA project does not create new significant or more severe impacts. No new mitigation is required.

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the State's inventory of forestland, including the Forest and Range Assessment Project and the Forest Legacy Assessment Project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. *Would the project:*

	<i>Where Impact was Analyzed in 2010 EIR</i>	<i>Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?</i>	<i>Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?</i>	<i>Any New Information Requiring New Analysis or Verification?</i>	<i>Do 2010 EIR Mitigation Measures Address/Resolve Impacts?</i>
2.f. Conflict with existing zoning for, or cause rezoning of, forestland (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))? <i>Note to reader: This question seeks to address the economic impact of converting forestland to a non-timber harvesting use.</i>	DEIR p. V-6 (timber resource is listed under Mineral Resource discussion).	No. Proposed changes do not involve impacts to forestland or timberland.	No.	No.	The project site does not contain forestland or timberland. There is no impact. No mitigation is required.

Environmental and Regulatory Setting:

The Agricultural Resources environmental and regulatory setting is presented in DEIR pp. IV.B-1 to IV.B-17. No changes in environmental setting, such as a reclassification of soil type or substantial change in availability of regional farmland, have occurred since certification of the 2010 EIR. LCP policies governing agricultural resources have been amended since certification of the 2010 EIR. Amended Policy 5.2 and Policy 5.4 require the County to designate parcels containing prime agricultural land or other land suitable for agriculture as Agriculture on the LCP Land Use Map. Consistency of the Big Wave NPA project with LCP Policy 5.2 and Policy 5.4 is discussed below in Response 2.d.

Discussion:

Would the proposed project:

- 2.a. For lands outside the Coastal Zone, convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?**

The 2010 EIR addressed project conversion of Prime Farmland in Impact AG-1 (DEIR p. IV.B-18). The Big Wave NPA project does not impact farmland outside the Coastal Zone. The proposed project is located within the Coastal Zone and subject to policies of the San Mateo County Local Coastal Plan. See Response 2.d for a discussion of project impacts on Prime Farmland within the coastal zone and project consistency with LCP agricultural policies.

The Big Wave NPA project would not result in a new significant or more severe impact than that identified in the 2010 EIR, and there are no new circumstances or information that require the evaluation of new mitigation measures or alternatives.

2.b. Conflict with existing zoning for agricultural use, an existing Open Space Easement, or a Williamson Act contract?

The 2010 EIR addressed potential conflicts with agricultural zoning and Williamson Act contracts in DEIR pp. IV.B-13-19 and V-5. Although both parcels are currently in agricultural use, neither parcel has agricultural zoning, an Open Space Easement, or a Williamson Act contract (DEIR pp. III-2 and V-5). Therefore, the project is not in conflict with zoning, open space easements, or contracts designed to protect agricultural use of lands.

Big Wave NPA project changes would create a 3.4-acre lot on the south parcel (Lot 2) to allow organic gardening (agricultural uses) to continue on the property. Organic gardening would also continue on the 0.7 acre archaeological preserve area. See Response 2.d for a discussion of project impacts on agricultural resources in the coastal zone. The Big Wave NPA project would not result in a new significant or more severe impact than that identified in the 2010 EIR, and there are no new circumstances or information that require the evaluation of new mitigation measures or alternatives.

2.c. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forestland to non-forest use?

The 2010 EIR addressed the potential for the project to convert agricultural land or forestland due to other changes in the existing environment. This impact is addressed in Impact AG-2 (DEIR p. IV.B-19).

No forestland or timber resources exist on the project property and therefore, the project would not result in conversion of forest land to non-forest use. The Big Wave NPA project would not result in a new significant or more severe impact than that identified in the 2010 EIR, and there are no new circumstances or information that require the evaluation of new mitigation measures or alternatives.

2.d. For lands within the Coastal Zone, convert or divide lands identified as Class I or Class II Agriculture Soils and Class III Soils rated good or very good for artichokes or Brussels sprouts?

The 2010 EIR addressed impacts to Coastal Zone agricultural land in Impact AG-1 (DEIR pp. IV.B-18-19). As identified in the EIR, the project site contains fields used historically for agricultural purposes and currently in active cultivation. The property is not classified as Unique or Prime Farmland by the California Department of Conservation, Farmland Mapping and Monitoring Program (DEIR, p. IV.B-9). Both parcels have Denison clay loam soils and are classified as Class II soils under the Department of Agriculture, Soil Conservation Service Land Capability Classification and Grade 2 soils under the Storie Index Rating (DEIR pp. IV.B-9 and IV.B-19). The parcels are suitable for most crops but have moderate limitations. The parcels are not designated as Important Farmland on the County Important Farmland Map. The project site is not designated as Agricultural land by the County General Plan. Project soils are suitable for growing most crops with moderate limitations. The project would continue to use a portion of the site for agricultural purposes through the BW Farming operation and operating a five-acre on-site nursery. The 2010 EIR concluded the impact was less than significant and no mitigation was required.

The Big Wave NPA project eliminates structural development on the south parcel and allows for the majority of the parcel to be used for agricultural purposes. Approximately 0.7 acres on Lot 1 containing the archaeological reserve and 3.4 acres on Lot 2 (less the coastal access parking) would be used by the Big Wave NPA project for organic gardening, resulting in a gain of agricultural land use on the project site from the 2010 proposal. The Big Wave NPA project would not result in a new significant or more severe impact than that identified in the 2010 EIR, and there are no new circumstances or information that require the evaluation of new mitigation measures or alternatives.

The CCC approved the San Mateo County's updated LCP in 2012 which includes new policies pertaining to agricultural resources. LCP Policy 5.1 requires designation of all lands which qualify for a Class I or Class II rating in the Land Compatibility Classification as prime agricultural land. Amended LCP Policies 5.2 and 5.4 call for the designation of existing prime agricultural lands or other lands suitable for agriculture as Agriculture on the LCP Land Use Map. Implementation of these policies require the County to undertake a comprehensive assessment of the County's entire Coastal Zone to identify all parcels containing prime agricultural lands and to thereafter prepare and submit an LCP amendment that will amend the Local Coastal Program Land Use Plan Map as described in Policy 5.2 and Policy 5.4. By themselves, Policy 5.2 and Policy 5.4 do not change the LCP's Land Use Plan Map and until the map is modified through an LCP amendment, the current LCP Land Use Map remains in effect. As a result, the proposed Big Wave NPA project is consistent with the current LCP Land Use Map which designates the project property as General Industrial. Any changes made by the County to the LCP Land Use Map for conformity to LCP Policy 5.2 and 5.4 would be subsequent to the Big Wave NPA project application having been deemed complete and acted on and would not apply to the project. Therefore, the proposed project property is considered consistent with the LCP land use designation and is not considered to impact designated farmland. The agricultural impact as described in the DEIR is less than significant and this conclusion remains unchanged by the amended LCP agricultural policies (Attachment D).

2.e. Result in damage to soil capability or loss of agricultural land?

The 2010 EIR addressed impacts to agricultural land in Impact AG-1 (DEIR pp. IV.B-18-19). The EIR determined that soils on the project site are classified as Class II soils under the Department of Agriculture, Soil Conservation Service Land Compatibility Classification (DEIR, Table IV.B-3 and pp. IV.B-18) and Grade 2 using the Storie Index rating (DEIR p. IV.B-and IV.B-19). Project soils are suitable for growing most crops with moderate limitations. The project site is not designated as Agricultural land by the County General Plan. The project would continue to use a portion of the site for agricultural purposes through the BW Farming operation and operating a five-acre on-site nursery. The 2010 EIR concluded the impact was less than significant and no mitigation was required.

The Big Wave NPA project would convert existing agricultural fields to developed uses as described in Response 2.d. The project would not damage the capability of soils in the undeveloped areas of the project property to be used for agricultural purposes. The Big Wave NPA project would not result in a new significant or more severe impact than that identified in the 2010 EIR, and there are no new circumstances or information that require the evaluation of new mitigation measures or alternatives.

2.f. Conflict with existing zoning for, or cause rezoning of, forestland (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?

The 2010 EIR determined the project area contains no forestland, timberland, or timberland zone Timberland Production (DEIR p. V-6). The project would not result in timberland impacts and no further discussion was required. The Big Wave NPA project would not introduce forestland or timberland impacts. The Big Wave NPA project would not result in a new

significant or more severe impact than that identified in the 2010 EIR, and there are no new circumstances or information that require the evaluation of new mitigation measures or alternatives.

Sources:

- California Coastal Commission. 2012a. W16a Staff Report: Appeal – Substantial Issue and De Novo. Application No. A-2-SMC-11-021. Applicant: Big Wave Group, LLC. Appellants: Committee for Green Foothills, Surfrider Foundation – San Mateo County and Loma Prieta Chapters, Sierra Club, Pillar Ridge Homeowners Association, San Mateo County League for Coastside Protection, Granada Sanitary District, Commissioners Steve Blank and Marry Shallenberger. Staff Report: July 27, 2012. Hearing Date: August 8, 2012.
- California Coastal Commission. 2012b. Staff Report Addendum for Item W16a. Coastal Development Permit No. A-2-SMC-11-021 (Big Wave Group, LLC, Princeton by the Sea, San Mateo County). Prepared August 7, 2012 for Hearing Date August 8, 2012.
- California Coastal Commission. 2014. Letter to Camille Leung, Planning and Building Department, San Mateo County. Subject: Big Wave North Parcel Alternative Project Referral (Big Wave Group, LLC and Big Wave Group, San Mateo County). Dated April 22, 2014.
- Christopher A. Joseph & Associates. 2009. Big Wave Wellness Center and Office Park Draft Environmental Impact Report. SCH No. 2008102109. October 2009.
- Christopher A. Joseph & Associates. 2010. Big Wave Wellness Center and Office Park Final Environmental Impact Report. SCH No. 2008102109. October 2010.
- County of San Mateo. 2011. Inter-Departmental Correspondence. Planning and Building Department to Board of Supervisors. Consideration of: (1) the certification of an Environmental Impact Report (EIR) consisting of a Draft EIR (DEIR) and a Final EIR (FEIR), (2) a Use Permit, (3) a Major Subdivision, (4) a Coastal Development Permit, (5) a Design Review Permit, (6) a Grading Permit, and (7) adoption of an Ordinance approving the execution of a Development Agreement with the County of San Mateo, for the Big Wave Wellness Center and Office Park proposed on two undeveloped parcels (APN 047-311-060 and APN 047-312-040) located in the unincorporated Princeton-by-the-Sea area of San Mateo County. March 1, 2011. Board Meeting Date March 15, 2011.
- County of San Mateo. 2013. Local Coastal Program Policies. June 2013.
- MacLeod and Associates. 2014. Civil Engineering Drawings. Sheet C-1 Vesting Tentative Map for Commercial and Residential Purposes “Big Wave”. Sheet C2 Grading and Drainage Plan with Permanent Storm Water Controls. Sheet C-3 Utility Plan. Sheet C4 Sediment and Erosion Control Plan. Sheet C5 Detail Sheet. June 30, 2014.

4.3 AIR QUALITY

Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. *Would the project:*

	Where Impact was Analyzed in 2010 EIR	<u>Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?</u>	<u>Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?</u>	<u>Any New Information Requiring New Analysis or Verification?</u>	<u>Do 2010 EIR Mitigation Measures Address/Resolve Impacts?</u>
3.a. Conflict with or obstruct implementation of the applicable air quality plan?	Impact AQ-1, DEIR pp. IV.C-14-17	No. Proposed changes reduce project scale and lower potential construction and operational emissions.	No.	Yes. The BAAQMD adopted a new air quality plan, the 2010 Clean Air Plan.	The 2010 EIR found Impact AQ-1 to be less than significant. No mitigation measures were required. The Big Wave NPA project does not create new significant or more severe impacts. No new mitigation is required. Assessment of the new information (updated Clean Air Plan) does not reveal new project impacts requiring mitigation.
3.b. Violate any air quality standard or contribute significantly to an existing or projected air quality violation?	Impact AQ-2, DEIR pp. IV.C-17-20 Impact AQ-2a, DEIR pp. IV.C-21-22 Impact AQ-2b, DEIR pp. IV.C-22-23	No. Proposed changes reduce project scale and lower potential construction and operational emissions.	No.	BAAQMD has developed and published new CEQA significance thresholds that are currently not recommended for use as a result of legal challenge.	The 2010 EIR found Impact AQ-2 (construction emissions) to be a potentially significant impact. Measure AQ-2 was required to reduce construction emissions to less than significance. This measure continues to fully address impacts associated with project changes. No new mitigation is required. The 2010 EIR found Impact AQ-2a and Impact AQ-2b to be less than significant. No mitigation measures were required. The Big Wave NPA project does not create new significant or more

Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. *Would the project:*

	Where Impact was Analyzed in 2010 EIR	<u>Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?</u>	<u>Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?</u>	<u>Any New Information Requiring New Analysis or Verification?</u>	<u>Do 2010 EIR Mitigation Measures Address/Resolve Impacts?</u>
					severe impacts. No new mitigation is required. However, a minor change to existing Measure AQ-2 is being made to reflect current BAAQMD BMPs for construction emissions.
3.c. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable Federal or State ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	Impact AQ-2f, DEIR p. IV.C-26 Impact AQ-3, DEIR p. IV.C-26	No. Proposed changes reduce project scale and lower potential construction and operational emissions.	No.	No.	The 2010 EIR found Impact AQ-2f and Impact AQ-3 to be less than significant. No mitigation measures were required. The Big Wave NPA project does not create new significant or more severe impacts. No new mitigation is required.
3.d. Expose sensitive receptors to significant pollutant concentrations, as defined by BAAQMD?	Impact AQ-2, DEIR pp. IV.C-17-19 Impact AQ-2a, DEIR pp. IV.C-21- 22 Impact AQ-2b, DEIR pp. IV.C-22-23 Impact AQ-2c, DEIR p. IV.C-23 Impact AQ-2d, DEIR pp. IV.C-23-25 Impact AQ-2e, DEIR pp. IV.C-25- 26 Impact AQ-4, DEIR p. IV.C-26	No. Proposed changes reduce project scale and lower potential construction and operational emissions.	No.	BAAQMD has developed and published new CEQA significance thresholds that are currently not recommended for use as a result of legal challenge.	The 2010 EIR found Impact AQ-2 (construction emissions) to be a potentially significant impact. Measure AQ-2 was required to reduce construction emissions to less than significance. This measure continues to fully address impacts associated with project changes. No new mitigation is required. The 2010 EIR found Impacts AQ-2a, AQ-2d, AQ-2e, and AQ-4 to be less than significant. No mitigation measures

Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. *Would the project:*

	<i>Where Impact was Analyzed in 2010 EIR</i>	<i>Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?</i>	<i>Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?</i>	<i>Any New Information Requiring New Analysis or Verification?</i>	<i>Do 2010 EIR Mitigation Measures Address/Resolve Impacts?</i>
					were required. The Big Wave NPA project does not create new significant or more severe impacts. No new mitigation is required. However, a minor change to existing Measure AQ-2 is needed to reflect current BAAQMD BMPs for construction emissions.
3.e. Create objectionable odors affecting a significant number of people?	Impact AQ-2c, DEIR p. IV.C-23 Impact AQ-5, DEIR pp. IV.C-26- 28	No. Proposed changes eliminate the wastewater treatment plant and wastewater drain fields on the project site and associated odors.	No.	No.	The 2010 EIR found Impact AQ-2c to be less than significant. No mitigation measures were required. The Big Wave NPA project does not create new significant or more severe impacts. No new mitigation is required. The 2010 EIR found Impact AQ-5 to be a potentially significant impact. Measure AQ-5 was required to reduce potential odors from the on-site wastewater treatment plan to less than significance. This measure is no longer required and is deleted.
3.f. Generate pollutants (hydrocarbon, thermal odor, dust or smoke particulates, radiation, etc.) that will violate existing standards of air	Impact AQ-1, DEIR pp. IV.C-14-17 Impact AQ-2, DEIR pp. IV.C-17-20 Impact AQ-2a through AQ-	No. Proposed changes reduce project scale and lower potential construction and operational emissions.	No.	No.	The 2010 EIR found Impacts AQ-1, AQ-2a through AQ-2f, AQ-3, and AQ-4 to be less than significant. No mitigation measures were required.

Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. *Would the project:*

	Where Impact was Analyzed in 2010 EIR	<u>Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?</u>	<u>Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?</u>	<u>Any New Information Requiring New Analysis or Verification?</u>	<u>Do 2010 EIR Mitigation Measures Address/Resolve Impacts?</u>
quality on-site or in the surrounding area?	2f, DEIR pp. IV.C-21-26 Impact AQ-3, DEIR pp. IV.C-26 Impact AQ 4, DEIR p. IV.C-26 Impact AQ-5, DEIR pp. IV.C-26-28				The 2010 EIR found Impact AQ-2 (construction emissions) to be a potentially significant impact. Measure AQ-2 was required to reduce construction emissions to less than significance. The 2010 EIR found Impact AQ-5 to be a potentially significant impact. Measure AQ-5 was required to reduce potential odors from the on-site wastewater treatment plan to less than significance. These measures fully address impacts associated with project changes. No new mitigation is required.

Environmental and Regulatory Setting:

The Air Quality environmental and regulatory setting is presented in DEIR pp. IV.C-1 to IV.C-13. No changes in environmental setting, such as a change in air basin attainment status, have occurred since certification of the 2010 EIR. Air quality conditions in the NPA project area have not substantially changed from that described in the 2010 EIR, and the NPA would be subject to air quality plans and regulations that are substantially the same or more stringent than those considered in the 2010 EIR (DEIR pp. IV.C-10-13). New regulatory guidance from the BAAQMD affecting significance thresholds is considered below.

Discussion:

Would the proposed project:

3.a. Conflict with or obstruct implementation of the applicable air quality plan?

The 2010 EIR identified the BAAQMD as the primary agency responsible for comprehensive air pollution control in the San Francisco Bay Area Air Basin (SFBAAB) and described that the BAAQMD developed its 2000 Clean Air Plan and 2005 Ozone Attainment Plan to bring the SFBAAB into attainment of ozone and coarse, or respirable, particulate matter (PM10) (DEIR pp. IV.C-11). The 2010 EIR described how the BAAQMD was in the process of drafting a 2009

Clean Air Plan (DEIR pp. IVC-11) and also listed relevant air quality policies from the County's 1986 General Plan Air Resources Chapter. Under Impact AQ-1, the 2010 EIR evaluated the project's potential to conflict with or obstruct implementation of an applicable air quality plan as follows:

- The EIR evaluated the project's consistency with the County's General Plan and concluded the project would not require a general plan amendment (DEIR p. IV.C-14).
- The EIR considered the consistency of the County's General Plan with the BAAQMD's 2000 Clean Air Plan and found that the General Plan did not meet all the requirements of the BAAQMD's 2000 Clean Air Plan because the County's General Plan had not been updated since 1994 (DEIR p. IV.C-14).
- In light of the above fact, the EIR evaluated whether the project, in combination with past, present, and reasonably foreseeable future projects, would cause the County's population to exceed Clean Air Plan and Association of Bay Area Governments population projects, and cause the rate of increase in vehicle miles travelled (VMT) to exceed the rate of increase in population (this evaluation was consistent with BAAQMD's 1999 CEQA Guidelines in effect at the time the EIR was prepared). At the project-level, the EIR found the project's potential to exceed 2000 Clean Air Plan population projects could not be determined because the plan only contained population projections through the year 2006 (DEIR p. IV.C-15); however, the EIR anticipated the majority of the jobs and housing created by the project would be filled by the existing population and would not contribute to existing population growth (DEIR p. IV.C-16). At the cumulative level, the EIR concluded the growth in jobs from related projects would be less than significant because of an existing imbalance of jobs in unincorporated Half Moon Bay and the City of Pacifica (approximately 1 job per 3 residents) (DEIR pp. IV.C-16). The EIR also found that the project would not cumulatively cause the rate of increase in VMT in San Mateo County to exceed the rate of increase in population in San Mateo County because VMT rates already exceeded population rates (19.8 percent increase in VMT in San Mateo County from 1990 to 2010, according to the County's Countywide Transportation Plan 2010, compared to a 13.7 percent increase in population in San Mateo County from 1990 to 2010, according to the California Department of Finance) (DEIR pp. IV.C-16 and 17).

The 2010 EIR concluded the Big Wave Project would not conflict with or obstruct implementation of the BAAQMD's 2000 Clean Air Plan or 2005 Ozone Strategy. The impact was determined to be less than significant and no mitigation was required.

The Big Wave NPA project reduces the scale of the previous development proposal considered in the 2010 EIR. The Big Wave NPA project does not involve a general plan amendment or changes that would affect regional air quality plans. VMT growth in the Bay Area and San Mateo County will continue to outpace population growth (BAAQMD 2010). In San Mateo County, VMT is expected to grow by at least approximately 27% between 2000 and 2030, while population is expected to grow by approximately 14% (MTC 2005, Table 19; Sustainable San Mateo County 2013, pg. 37; Bay Area Census 2014).

Air quality conditions in the project area have not substantially changed from that described in the 2010 EIR (DEIR pp. IV.C-1 to IV.C-10), and the project would remain subject to air quality plans and regulations that are substantially the same or more stringent than those considered in the 2010 EIR (DEIR pp. IV.C-10 to IV.C-13).

New information related to air quality plans was considered. This information includes the following:

- 1) The BAAQMD adopted a new air quality plan, the 2010 Clean Air Plan. The 2010 Clean Air Plan is a comprehensive plan designed to improve Bay Area air quality and protect public health. It addresses four categories of pollutants: ozone and ozone precursors

(e.g., reactive organic gases, or ROG, and oxides of nitrogen, or NOX), fine particulate matter, toxic air contaminants (TACs), and greenhouse gases (GHG). The 2010 Clean Air Plan includes 55 control measures to reduce emissions and decrease ambient concentrations of harmful pollutants, safeguard public health, and reduce GHG emissions. Some of these 55 measures were incorporated into earlier BAAQMD air quality plans, but the 2010 Clean Air Plan also includes a new Land Use and Local Impact category with control measures to address local air pollution impacts.

2) The BAAQMD has initiated the process to update the 2010 Clean Air Plan.

The topics and issues addressed by this new information were generally known at the time of the 2010 EIR. For example, the BAAQMD's 2000 Clean Air Plan and 2005 Ozone Strategy addressed ozone attainment and provided information on particulate matter emissions in the SFBAAB, and the 2010 EIR acknowledged the BAAQMD was in the process of updating and drafting a new Clean Air Plan (DEIR p. IV.C-11). Therefore, this new information is not considered to be of substantial importance because it does not show the project would result in a new significant or substantially more severe significant environmental effect that could not have been known at the time the EIR was certified.

The Big Wave NPA project would not result in a new significant or more severe impact than that identified in the 2010 EIR, and there are no new circumstances or information that require the evaluation of new mitigation measures or alternatives.

3.b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation?

The 2010 EIR evaluated the potential for the project's construction and operation emissions to violate any air quality standard or contribute to an existing or projected air quality violation in Impact AQ-2 (DEIR pp. (IV.C-17-26) as follows:

- The EIR qualitatively addressed construction emissions, with an emphasis on coarse or respirable particulate matter (PM10) in the form of fugitive dust as the pollutant of greatest concern (this emphasis was consistent with BAAQMD's 1999 CEQA Guidelines in effect at the time the EIR was prepared). , and required the applicant to implement Measure AQ-2, a dust control program containing 12 BAAQMD-recommended dust control measures commensurate with the size and scale of the project's construction activities. With the inclusion Measure AQ-2, the EIR found project construction emissions would be less than significant.
- The EIR quantified (using the Urban Emissions Estimator Model, or URBEMIS) and compared the mass amount (i.e., pounds per day or tons per year) of mobile (i.e., vehicles) and area source (e.g., landscaping equipment) emissions that project operation would generate against BAAQMD CEQA significance thresholds for ozone precursor pollutants (reactive organic gases, or ROG, and oxides of nitrogen, or NOX) and PM10. The EIR found emissions from project operation would be less than significant because they would be below BAAQMD CEQA significance thresholds.
- For carbon monoxide (CO), the EIR quantified (using a simplified CALINE4 screening procedure developed by the BAAQMD) and compared vehicle-produced CO concentrations at study intersections against NAAQS and California ambient air quality standards (CAAQS). The EIR found CO concentrations from project vehicle trips would be less than significant because they would not exceed CAAQS/NAAQS.
- The EIR did not evaluate stationary sources of emissions such as the potential on-site membrane bioreactor, wastewater treatment plant, and emergency, natural-gas fired generator because the specific make, model, and other key operating features of these sources were not known, and this equipment would be subject to CEQA review and permitting by the BAAQMD.

The Big Wave NPA project construction involves less on-site development and total cut and fill activities (approximately 22,100 yds³ for Big Wave NPA compared to 49,600 yds³ considered in the 2010 EIR) over a longer time period (up to a 15-year phased construction period for Big Wave NPA compared to 30 – 36 month construction period considered in the 2010 EIR). Although Big Wave NPA project construction activities do result in a greater amount of import (approximately 21,400 yds³ for Big Wave NPA compared to 4,100 yds³ of fill import considered in the 2010 EIR), these activities do not result in new significant or more severe impacts. Big Wave NPA construction emissions were estimated using CalEEMod 2013.2.2 (Attachment G) and found to be below the construction emission estimates presented in Appendix D to the 2010 EIR. This decrease in emissions is primarily due to cleaner equipment and reduced on-site construction activities.

The Big Wave NPA project operation involves the same type of residential, recreational, and commercial facilities considered in the 2010 EIR, but at less intensive development rates. For example, the Big Wave NPA project would have one less building, 36,000 less sq. ft of office space, and 136 less parking spaces than the 2010 project (Table 1). This decrease in development would reduce vehicle trip emissions, the primary source of operational emissions considered in the 2010 EIR.

The Big Wave NPA project includes fewer potential stationary sources of emissions (i.e., the back-up generator would remain but the NPA does not include an on-site wastewater treatment plant).

The Big Wave NPA project changes result in fewer emissions than the levels analyzed in the 2010 EIR. The Big Wave NPA project does not include changes that could result in a new significant impact or a substantially more severe impact than that considered in the 2010 EIR. Measure AQ-2 remains applicable and would fully address construction emission impacts, particularly fugitive dust, associated with the Big Wave NPA project. There have not been substantial changes with respect to the circumstances under which the Big Wave NPA project would be undertaken that involve new significant or substantially more severe environmental effects than that identified in the 2010 EIR. No new mitigation is required.

New information related to air quality violations has been made available since certification of the 2010 EIR. This information was considered and is as follows:

- 1) The U.S. EPA revised the NAAQS for carbon monoxide (CO), nitrogen dioxide (NO₂), sulfur dioxide (SO₂), and fine particulate matter (PM_{2.5}).
- 2) The U.S. EPA determined the San Francisco Bay Area attained the 2006 24-hr NAAQS for PM_{2.5}; however, the Bay Area remains officially designated “non-attainment” for this NAAQS.
- 3) The BAAQMD adopted a new air quality plan applicable to the project, the 2010 Clean Air Plan, and has initiated the process to update the 2010 Clean Air Plan (see Response 3.a.).
- 4) The BAAQMD published new significance thresholds for use by Lead Agencies conducting CEQA review. The new CEQA significance thresholds are generally more stringent (i.e., lower) than the thresholds used in the 2010 EIR and involve different impact assessment methodologies; however, the BAAQMD is currently not recommending use of the new thresholds due to legal challenge.

The topics, issues, and impact assessment methodologies addressed by this new information were known at the time of the 2010 EIR. For example, the U.S. EPA has maintained NAAQS for CO, NO₂, SO₂, and PM_{2.5} since the 1970's (1997 for PM_{2.5}), and the BAAQMD began the process to update its CEQA Guidelines in April 2009 and issued revised draft CEQA Air Quality Guidelines document in September 2009, before the Big Wave Wellness Center and Office Park Project DEIR was published in October 2009. In addition, the Court of Appeal of California, First Appellate District, recently found the adoption of guidelines for analyzing and evaluating the

significance of data does not constitute new information of substantial importance if the underlying information was otherwise known or should have been known at the time the EIR was certified (*Concerned Dublin Citizens vs. the City of Dublin* 2013). Thus, this new information is not considered to be of substantial importance because it does not show the project would result in a new significant or substantially more severe significant environmental effect that could not have been known at the time the EIR was certified.

In response to BAAQMD changes to BMPs for construction emissions, the following minor text addition (additional BMPs) to existing Measure AQ-2 is made (see Attachment E for full text of Measure AQ-2 with track changes):

- Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations). Clear signage shall be provided for construction workers at all access points.
- Post a publicly visible sign with the name and telephone number of the construction contractor and San Mateo County staff person to contact regarding dust complaints. This person shall respond and take corrective action within 48 hours. The publicly visible sign shall also include the contact phone number for the BAAQMD to ensure compliance with applicable regulations.

3.c. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

The 2010 EIR identified the SFBAAB as an area of non-attainment for state ozone, national ozone, state PM10, state PM2.5, and national PM2.5 (DEIR p. IV.C-9). Under Impact AQ-2f and Impact AQ-3, the 2010 EIR evaluated the project's potential to result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable NAAQS/CAAQS. The EIR quantified (using URBEMIS) and compared the mass amount (i.e., pounds per day or tons per year) of mobile (i.e., vehicles) and area source (e.g., landscaping equipment) emissions that project operation would generate against BAAQMD CEQA significance thresholds for ozone precursor pollutants (reactive organic gases, or ROG, and oxides of nitrogen, or NOX) and PM10. The EIR found emissions from project operation would be less than significant because they would be below BAAQMD CEQA significance thresholds. The EIR concluded the Big Wave project would not result in cumulative air quality impacts. No mitigation was required.

The Big Wave NPA is a reduced development project resulting in fewer construction emissions and fewer operational emissions. As a result, project emissions of criteria pollutants are below the levels analyzed in the 2010 EIR. The Big Wave NPA project does not include changes that could result in a new significant impact or a substantially more severe impact than that considered in the 2010 EIR (see Responses 3.a., 3.b., and 3.d.). There are no new circumstances or information that require the evaluation of new mitigation measures or alternatives.

3.d. Expose sensitive receptors to substantial pollutant concentrations, as defined by BAAQMD?

The 2010 EIR described that the Big Wave project would contain residential units (i.e., potentially locate sensitive air quality receptors near existing sources of TACs) and is bordered by Pillar Ridge Manufactured Home Community to the north (i.e., the project is a potential source of TACs and will be located near sensitive air quality receptors). Under Impacts AQ-2, AQ-2a, AQ-2d, AQ-2e, and AQ-4 the 2010 EIR evaluated the project's potential to expose sensitive air quality receptors to significance pollutant concentrations, including substantial levels of TACs, as follows:

- The EIR quantified (using URBEMIS) and compared the mass amount (i.e., pounds per day or tons per year) of mobile (i.e., vehicles) and area source (e.g., landscaping equipment) emissions that project operation would generate against BAAQMD CEQA significance thresholds for ozone precursor pollutants (reactive organic gases, or ROG, and oxides of nitrogen, or NOX) and PM10. The EIR found emissions from project operation would be less than significant because they would be below BAAQMD CEQA significance thresholds.
- The EIR reviewed the annual emissions of TACs from facilities within one mile of the project site and compared these emissions against BAAQMD Regulation 2, Rule 5 thresholds that trigger the need to prepare a health risk assessment. The EIR found existing TAC emissions did not exceed BAAQMD Regulation 2, Rule 5 health risk thresholds.
- The EIR considered the potential for project vehicles to generate significant TAC emissions. The EIR found the project would not exceed BAAQMD significance thresholds because the project would not generate a large amount of daily truck trips (approximately 56 trips per day).
- The EIR considered the potential for the project to expose receptors to acutely hazardous air emissions from accidental releases by reviewing environmental regulatory lists and records for the project site and adjoining properties. The EIR found the project would not use or store acutely hazardous materials or otherwise expose receptors to acutely hazardous materials.

The Big Wave NPA Project does not include changes that could result in a new significant impact or a substantially more severe impact than that considered in the 2010 EIR for the following reasons:

- Big Wave NPA Project construction involves less on-site development and total grading activities (see Response 3.b.)
- Big Wave NPA Project operation involves the same type of residential, recreational, and commercial facilities considered in the 2010 EIR, but at less intensive development rates (see Response 3.b.)
- TAC emissions from facilities considered in the 2010 EIR have not changed substantially and remain below health risk assessment trigger thresholds identified in the 2010 EIR
- Big Wave NPA Project daily truck trips would be less than that considered in the 2010 EIR. With the shortened project phasing, buildings would still be constructed one at a time; daily truck trips would not be increased by the change in phasing schedule.
- The Big Wave NPA Project does not include the use or storage of acutely hazardous materials and a review of California Department of Toxic Substances and California State Water Resources Control Board databases (Envirostor and Geotracker, respectively), indicated no active contamination sites at the project site or adjoining properties.

There have not been substantial changes with respect to the circumstances under which the Big Wave NPA project would be undertaken that involve new significant or substantially more severe environmental effects than that identified in the EIR (see Responses 3.a. and 3.b.).

In reviewing the Big Wave NPA project, the following new information related to sensitive receptors and pollutant concentrations discussion was considered:

- 1) The U.S. EPA revised the NAAQS for nitrogen dioxide, sulfur dioxide, and fine particulate matter (PM2.5).

- 2) The U.S. EPA determined the San Francisco Bay Area attained the 2006 24-hr NAAQS for PM_{2.5}; however, the Bay Area remains officially designated “non-attainment” for this NAAQS.
- 3) The BAAQMD adopted a new air quality plan applicable to the project, the 2010 Clean Air Plan (see Response 3.a.).
- 4) The BAAQMD developed and published new significance thresholds for use by Lead Agencies conducting CEQA review (see Response 3.b.).
- 5) CARB criteria and toxic air contaminant plus risk data (CARB Facility Search Engine)
- 6) State Water Resources Control Board Geotracker Database
- 7) California Department of Toxic Substances Control Envirostor Database

The 2010 EIR concluded the Big Wave Wellness Center and Office Park Project would have a potentially significant construction emissions impact and required the applicant to implement Measure AQ-2 to reduce construction emissions, and in particular construction fugitive dust, to less than significance. The 2010 EIR concluded the Big Wave Project would not expose sensitive receptors to substantial pollutant concentrations and therefore did not include mitigation for Impact AQ-2a, Impact AQ-2d, Impact AC-2e, or Impact AQ-4. The Big Wave NPA project would not result in a new significant or more severe impact than that identified in the 2010 EIR, and there are no new circumstances or information that require the evaluation of new mitigation measures or alternatives.

3.e. Create objectionable odors affecting a substantial number of people?

The 2010 EIR evaluated the project’s potential to expose members of the public to objectionable odors in Impact AQ-2c and AQ-5. The EIR identified off-site facilities with the potential to create objectionable odors within one mile of the project site and found no odor complaints had been submitted to the BAAQMD regarding these facilities. The EIR identified the on-site wastewater treatment plant as a potentially significant source of objectionable odors and required the applicant to implement Measure AQ-5 (supporting engineering information verifying odor removal system). With the implementation of Measure AQ-5, the EIR found odors from the on-site wastewater treatment plant would be less than significant.

The Big Wave NPA Project does not include changes that could result in a new significant impact or a substantially more severe impact than that considered in the 2010 EIR. There are no new off-site facilities with the potential to create objectionable odors. The Big Wave NPA Project eliminates the on-site wastewater treatment plant and does not include other sources of objectionable odors. As a result, Measure AQ-5 is no longer required for the Big Wave NPA Project and is deleted (Attachment E). The Big Wave NPA project would not result in a new significant or more severe impact than that identified in the 2010 EIR (see Responses 3.a., 3.b., and 3.d.), and there are no new circumstances or information that require the evaluation of new mitigation measures or alternatives.

3.f. Generate pollutants (hydrocarbon, thermal odor, dust or smoke particulates, radiation, etc.) that will violate existing standards of air quality on-site or in the surrounding area?

The 2010 EIR addressed this violation of air quality standards in Impact AQ-1 through AQ-5 (see Responses 3.a. through 3.e.) The project does not involve generation of thermal odor, smoke, or radiation. The Big Wave NPA Project does not include changes that could result in a new significant impact or a substantially more severe impact than that considered in the 2010 EIR. The Big Wave NPA project would not result in a new significant or more severe impact than that identified in the 2010 EIR, and there are no new circumstances or information that require the evaluation of new mitigation measures or alternatives.

Sources:

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- Bay Area Air Quality Management District (BAAQMD). 2014. Clean Air Plan Update website (<http://www.baaqmd.gov/Divisions/Planning-and-Research/Plans/Clean-Air-Plan-Update.aspx>), accessed on June 6, 2014.
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- Sustainable San Mateo County. 2013. Indicators for a Sustainable San Mateo County Seventeenth Annual Report - 2013. San Mateo County, Ca. April 2013.
- U.S. Environmental Protection Agency. National Ambient Air Quality Standards website (<http://www.epa.gov/air/criteria.html>), accessed June 5, 2014.

4.4 BIOLOGICAL RESOURCES

<i>Would the project:</i>					
	<i>Where Impact was Analyzed in 2010 EIR</i>	<i>Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?</i>	<i>Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?</i>	<i>Any New Information Requiring New Analysis or Verification?</i>	<i>Do 2010 EIR Mitigation Measures Address/Resolve Impacts?</i>
4.a. Have a significant adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	Impact BIO-1, DEIR pp. IV.D-18, 25-90 FEIR pp. III.C-3-4	No. Proposed changes decrease the development footprint from 10.5 to 7.9 acres, cluster building development on the north parcel, increase the wetland buffer size from 100 to 150 feet on the north parcel and increase the riparian setback from 100 to 250 feet on the north parcel.	No. A CNDDDB records search and field review shows no new occurrences of special-status species on site.	No.	The 2010 EIR found Impact BIO-1 to be a potentially significant impact. Measures BIO-1a through BIO-1d were required to reduce special-status species impacts to less than significance. This measure fully addresses impacts associated with project changes. No new mitigation is required.
4.b. Have a significant adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	Impact BIO-2, DEIR pp. IV.D-9-11, 13-14, 20-21, 23- 24, 84-85, 98 FEIR pp. III.C-3-4	No. Proposed changes increase the wetland buffer size from 100 to 150 feet on the north parcel and increase the riparian setback from 100 to 250 feet on the north parcel.	No.	No.	The 2010 EIR found Impact BIO-2 to be less than significant. No mitigation measures were required. The Big Wave NPA project does not create new significant or more severe impacts. No new mitigation is required.
4.c. Have a significant adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	Impact BIO-3, DEIR pp. IV.D-14, 16, 21, 84-85, 98 Figures IV.D-1 and IV.D-2 FEIR pp. III.C-3-4	No. Proposed changes increase the wetland buffer size from 100 to 150 feet on the north parcel and increase the riparian setback from 100 to 250 feet on the north parcel.	No.	No.	The 2010 EIR found Impact BIO-3 to be less than significant. No mitigation measures were required. The Big Wave NPA project does not create new significant or more severe impacts. No new mitigation is required.

<i>Would the project:</i>					
	<i>Where Impact was Analyzed in 2010 EIR</i>	<i>Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?</i>	<i>Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?</i>	<i>Any New Information Requiring New Analysis or Verification?</i>	<i>Do 2010 EIR Mitigation Measures Address/Resolve Impacts?</i>
4.d. Interfere significantly with the movement of any native resident or migratory fish or wildlife species or with established native resident migratory wildlife corridors, or impede the use of native wildlife nursery sites?	Impact BIO-4, DEIR pp. IV.D-14, 87- 91, 94-98 FEIR pp. III.C-3-4	No. Proposed changes increase the wetland buffer size from 100 to 150 feet on the north parcel and increase the riparian setback from 100 to 250 feet on the north parcel.	No.	No.	The 2010 EIR found Impact BIO-4 to be potentially significant impact. Measure BIO-4a was required to reduce this impact to less than significance. This measure fully addresses impacts associated with project changes. No new mitigation is required.
4.e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance (including the County Heritage and Significant Tree Ordinances)?	Impact BIO-5, DEIR pp. IV.D-7-15, 84, 99 FEIR pp. III.C-3-4	No. Proposed changes do not involve biological resources protected by County policy or ordinance.	No.	No.	The 2010 EIR found Impact BIO-5 to be less than significant. No mitigation measures were required. The Big Wave NPA project does not create new significant or more severe impacts. No new mitigation is required.
4.f. Conflict with the provisions of an adopted Habitat Conservation Plan (HCP), Natural Conservation Community Plan (NCCP), other approved local, regional, or State habitat conservation plan?	DEIR p. IV.D-93 FEIR pp. III.C-3-4	No. Proposed changes do not involve impacts to HCPs or NCCPs.	No.	No.	HCPs or NCCPs do not apply to the project site. There is no impact. No mitigation is required.
4.g. Be located inside or within 200 feet of a marine or wildlife reserve?	Not included in DEIR thresholds of significance	No. Proposed changes do not involve impacts to marine and wildlife reserves.	No.	No.	The project site is not located inside or within 200 feet of a marine or wildlife reserve. There is no impact. No mitigation is required.

<i>Would the project:</i>					
	<i>Where Impact was Analyzed in 2010 EIR</i>	<i>Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?</i>	<i>Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?</i>	<i>Any New Information Requiring New Analysis or Verification?</i>	<i>Do 2010 EIR Mitigation Measures Address/Resolve Impacts?</i>
4.h. Result in loss of oak woodlands or other non-timber woodlands?	Not included in DEIR thresholds of significance	No. Proposed changes do not involve impacts to oak woodlands or non-timber woodlands.	No.	No.	The project site does not have oak woodlands nor does it result in impacts to other non-timber woodlands. There is no impact. No mitigation is required.

Environmental and Regulatory Setting:

The Biological Resources environmental and regulatory setting is presented in DEIR pp. IV.D-1 to IV.D-93. Based on field investigation of site conditions and a record search of the California Natural Diversity Database (CNDDDB) and California Native Plant Society (CNPS), no changes in biological resources on the site, wetland boundaries, or new occurrence of species identified as candidate, sensitive, or special-status species in the immediate project vicinity have occurred since certification of the 2010 EIR (Figure 12).

Discussion:

Would the proposed project:

- 4.a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?**

The 2010 EIR addressed potential indirect significant impacts to western pond turtle (WEPT), San Francisco garter snake (SFGS) and California red-legged frog (CRLF). Technical reports that are included in the EIR document the availability of suitable habitat in the vicinity of the project, and nearby occurrences of these species. The 2010 EIR identified that SFGS have a moderate potential to occur on the site and that they might use the drainage separating the two parcels and might use the site for overland movements. The project could result in a potentially significant indirect impact to SFGS.

The Big Wave NPA project decreases the project footprint and increases the construction buffer to 150 feet on the north parcel. These changes reduce indirect impacts to WEPT, CRLF, and SFGS to a level below those analyzed in the 2010 EIR. The proposed Big Wave NPA project would significantly reduce impact to SFGS and the existing Measure BIO-1a (Attachment E) sufficiently mitigates impacts to SFGS migration. The Big Wave NPA project would not result in a new significant or more severe impact than that identified in the 2010 EIR, and there are no new circumstances or information that require the evaluation of new mitigation measures or alternatives.

Project consistency with LCP Policies 7.3, 7.4, 7.5, and 7.36 governing sensitive habitats and special-status species is discussed in Attachment D.

4.b. Have a significant adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?

The 2010 EIR identified riparian corridors and wetlands as a sensitive natural community occurring on the project site. The riparian habitat occurs along the drainage that divides the two project parcels. The EIR concluded that riparian habitat is protected by setback buffers and, therefore, the impact is less than significant (DEIR p. IV.D-98; Impact BIO-2).

The Big Wave NPA would increase the riparian setback buffer from 100 to 250 feet on the north parcel (Figure 4). On the south parcel, development adjacent to the 100-foot buffer is eliminated. The land adjacent to this riparian drainage buffer would be retained in agricultural (organic gardening) use. As a result, the Big Wave NPA impacts to riparian habitat are below those analyzed in the 2010 EIR. The Big Wave NPA project would not result in a new significant or more severe impact than that identified in the 2010 EIR, and there are no new circumstances or information that require the evaluation of new mitigation measures or alternatives.

Project consistency with LCP Policies 7.9 and 7.11 governing riparian corridors is discussed in Attachment D.

4.c. Have a significant adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

The 2010 EIR stated that a total 0.45 acres of Type 3 waters of the U.S. and an additional 0.29 acres of single parameter (vegetation) wetlands conforming to the California Coastal Act occur on the project site (DEIR p. IV.D-91). A wetland delineation for the project site was prepared in 2009 identifying lands within U.S. Army Corps of Engineers (USACE) and CCC jurisdiction. The 2010 project was designed with development set back 100 feet from the jurisdictional wetland boundary. The 2010 EIR finds that with a 100-foot buffer, impacts to wetlands would be less than significant (DEIR p. IV.D-98; Impact BIO-3).

The Big Wave NPA project site plan has been revised to provide a 150-foot buffer between proposed development on the north parcel and the delineated wetland boundary. While LCP Policy 7.18 specifies a minimum 100-foot setback requirement or buffer distance between wetland boundaries and proposed development, the CCC has specified 150 feet as the minimum buffer that should be applied to the wetlands at the Big Wave project site due to proximity to the important habitat at Pilarcitos Marsh, the documented uncertainty of the delineated wetland boundary due to plowed vegetation, and due to the sensitive nature of the potential species and habitat present at this location (CCC 2012b).

By increasing the wetland buffer on the north parcel to 150 feet and eliminating development adjacent to the 100-foot buffer on the south parcel, Big Wave NPA impacts have been reduced to a level below those analyzed in the 2010 EIR. The boat storage area on the south parcel is proposed outside the 100-foot wetland buffer zone. Although boat storage is a new use, it is proposed in the area previously identified for development and does create a new biological impact. Thus, the impact to wetlands remains less than significant. The Big Wave NPA project would not result in a new significant or more severe impact than that identified in the 2010 EIR, and there are no new circumstances or information that require the evaluation of new mitigation measures or alternatives.

Project consistency with LCP Policies 7.16, 7.18, and 7.19 governing wetlands is discussed in Attachment D.

4.d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Wildlife movement and habitat connectivity is assessed in the 2010 EIR (DEIR p. IV.D-98; Impact BIO-4). The 2010 EIR concluded the Big Wave project would not impede wildlife use of the riparian drainage and buffer area as a movement corridor and, therefore, the impact was found to be less than significant. However, measures were recommended to further protect wildlife habitat in Measure BIO-4a. These measures address fencing, lighting, dogs and cats, and wildlife access to garbage, recycling, and composting. The Big Wave NPA project increases the development setback distance from the riparian drainage serving as a wildlife movement corridor, resulting in a reduced impact from the level analyzed in the 2010 EIR. The proposed willow wattle fencing for the Big Wave NPA meets the requirements of Measure BIO-4a by allowing wildlife passage. The Big Wave NPA project would not result in a new significant or more severe impact than that identified in the 2010 EIR, and there are no new circumstances or information that require the evaluation of new mitigation measures or alternatives.

The 2010 EIR identified that western pond turtle (WEPT) have a moderate potential to occur on the project site and could use the site for overland movements. The 2010 EIR also acknowledges that California red-legged frog (CRLF) have a moderate potential to occur on-site. The EIR states that the project could result in a potentially significant indirect impact to WEPT and CRLF (DEIR p. IV.D-94; Impact BIO-1). The proposed Big Wave NPA shrinks the development footprint result in impacts to WEPT and CRLF being reduced to a level below those analyzed in the 2010 EIR. Existing Measures BIO-1a through BIO-1d continue to mitigate impacts to natural habitats including migration routes to a less-than-significant level.

The 2010 EIR identified that SFGS have a moderate potential to occur on the site and that they might use the drainage separating the two parcels and might use the site for overland movements. The EIR states that the project could result in a potentially significant indirect impact to SFGS. The proposed Big Wave NPA would result in impacts to SFGS being reduced to a level below those analyzed in the 2010 EIR due to increased wetland buffer areas. The existing Measure BIO-1a continues to mitigate impacts to migration routes to a less-than-significant level.

Project consistency with LCP Policy 7.36 governing rare and endangered species is discussed in Attachment D.

4.e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

The 2010 EIR discussed the biological protection policies of the County of San Mateo General Plan, San Mateo County Significant Tree Ordinance, Heritage Tree Ordinance, Excavation, Grading, Filling and Clearance Ordinance, and the County of San Mateo Local Coastal Program. See discussion of impacts as governed by the San Mateo County LCP to SFGS, CRLF, WEPT, northern coastal scrub, riparian corridors and wetlands above in Responses 4.a. through and 4.d. No impacts to significant or heritage trees were identified in the 2010 EIR.

The Big Wave NPA project provides a 100-foot setback buffer along the riparian drainage on the south parcel and a 250-foot setback buffer on the north parcel. The decrease in the overall developed footprint and the increased setback buffer to 150 feet for the north parcel result in a decreased impact to biological resources from the level analyzed in the 2010 EIR. The Big Wave NPA project would not result in a new significant or more severe impact than that identified in the 2010 EIR, and there are no new circumstances or information that require the evaluation of new mitigation measures or alternatives.

4.f. Conflict with the provisions of an adopted Habitat Conservation Plan (HCP), Natural Community Conservation Plan (NCCP), or other approved local, regional, or state habitat conservation plan?

The project site and its vicinity are not located within an area covered by a HCP, NCCP, or other approved conservation plan. The Big Wave NPA project would not result in a new significant or more severe impact than that identified in the 2010 EIR, and there are no new circumstances or information that require the evaluation of new mitigation measures or alternatives.

4.g. Be located inside or within 200 feet of a marine or wildlife reserve?

This significance threshold was adopted by San Mateo County in 2013 subsequent to certification of the 2010 EIR and is considered below.

The Big Wave NPA project is not located inside or within 200 feet of a marine or wildlife reserve. The Fitzgerald Marine Reserve is located approximately one-quarter mile due west from the project site. The Big Wave NPA project would not result in a new significant or more severe impact than that identified in the 2010 EIR, and there are no new circumstances or information that require the evaluation of new mitigation measures or alternatives.

4.h. Result in loss of oak woodlands or other non-timber woodlands?

This significance threshold was adopted by San Mateo County in 2013 subsequent to certification of the 2010 EIR and is considered below.

The Big Wave NPA project site does not support any oak woodland or non-timber woodland habitat, and would not impact these habitat types. See discussion of impacts to riparian woodlands in Response 4.b. above. The Big Wave NPA project would not result in a new significant or more severe impact than that identified in the 2010 EIR, and there are no new circumstances or information that require the evaluation of new mitigation measures or alternatives.

Sources:

- California Coastal Commission. 2012a. W16a Staff Report: Appeal – Substantial Issue and De Novo. Application No. A-2-SMC-11-021. Applicant: Big Wave Group, LLC. Appellants: Committee for Green Foothills, Surfrider Foundation – San Mateo County and Loma Prieta Chapters, Sierra Club, Pillar Ridge Homeowners Association, San Mateo County League for Coastsides Protection, Granada Sanitary District, Commissioners Steve Blank and Marry Shallenberger. Staff Report: July 27, 2012. Hearing Date: August 8, 2012.
- California Coastal Commission. 2012b. Staff Report Addendum for Item W16a. Coastal Development Permit No. A-2-SMC-11-021 (Big Wave Group, LLC, Princeton by the Sea, San Mateo County). Prepared August 7, 2012 for Hearing Date August 8, 2012.
- California Natural Diversity Database (CNDDDB). 2014. Version 3.1.0, Department of Fish and Game Biogeographic Data Branch. May 2014
- Christopher A. Joseph & Associates. 2009. Big Wave Wellness Center and Office Park Draft Environmental Impact Report. SCH No. 2008102109. October 2009.
- Christopher A. Joseph & Associates. 2010. Big Wave Wellness Center and Office Park Final Environmental Impact Report. SCH No. 2008102109. October 2010.
- County of San Mateo. 2013. Local Coastal Program Policies. June 2013.
- MacLeod and Associates. 2014. Civil Engineering Drawings. Sheet C-1 Vesting Tentative Map for Commercial and Residential Purposes “Big Wave”. Sheet C2 Grading and Drainage Plan with Permanent Storm Water Controls. Sheet C-3 Utility Plan. Sheet C4 Sediment and Erosion Control Plan. Sheet C5 Detail Sheet. June 30, 2014.
- MacLeod and Associates. 2014. NPA Landscaping Plan. Sheet 7 of 8. Undated.

4.5 CULTURAL RESOURCES

<i>Would the project:</i>					
	<i>Where Impact was Analyzed in 2010 EIR</i>	<i>Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?</i>	<i>Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?</i>	<i>Any New Information Requiring New Analysis or Verification?</i>	<i>Do 2010 EIR Mitigation Measures Address/Resolve Impacts?</i>
5.a. Cause a significant adverse change in the significance of a historical resource as defined in CEQA Section 15064.5	Impact CULT-1, DEIR pp. IV.E9-14	No. Proposed changes do not involve impacts to historical resources.	No.	No.	The 2010 EIR found Impact CULT-1 to be less than significant. No mitigation measures were required. The Big Wave NPA project does not create new significant or more severe impacts. No new mitigation is required.
5.b. Cause a significant adverse change in the significance of an archaeological resource pursuant to CEQA Section 15064.5?	Impact CULT-2, DEIR pp. IV.E-4, 5, 8, 9, 13-16	No. Proposed changes establish a 0.7-acre Archaeological Preserve to protect known resources. Site would be used for organic gardening.	No.	No.	The 2010 EIR found Impact CULT-2 to be a potentially significant impact. Measures CULT-2a, 2b, and 2c were required to reduce archaeological resource impacts to less than significance. This measure fully addresses impacts associated with project changes. No new mitigation is required.
5.c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	Impact CULT-3, DEIR pp. IV.E-5, 8, 13, 16-17	No. Proposed changes do not involve known impacts to paleontological resources or geologic features. Proposed changes reduce the site development footprint.	No.	No.	The 2010 EIR found Impact CULT-3 to be a potentially significant impact. Measure CULT-3 was required to reduce paleontological resource impacts to less than significance. This measure fully addresses impacts associated with project changes. No new mitigation is required.

<i>Would the project:</i>					
	<i>Where Impact was Analyzed in 2010 EIR</i>	<i>Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?</i>	<i>Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?</i>	<i>Any New Information Requiring New Analysis or Verification?</i>	<i>Do 2010 EIR Mitigation Measures Address/Resolve Impacts?</i>
5.d. Disturb any human remains, including those interred outside of formal cemeteries?	Impact CULT-4, DEIR pp. IV. E-6, 7, 13-14, 17	No. Proposed changes do not involve known impacts to human remains. Proposed changes reduce site development.	No.	No.	The 2010 EIR found Impact CULT-4 to be less than significant. No mitigation measures were required. The Big Wave NPA project does not create new significant or more severe impacts. No new mitigation is required.

Environmental and Regulatory Setting:

The Cultural Resources environmental and regulatory setting is presented in DEIR pp. IV.E-2 to IV.E-9. No changes in environmental setting, such as discovery of previously unknown resources on the project site, have occurred since certification of the 2010 EIR.

Discussion:

Would the proposed project:

5.a. Cause a significant adverse change in the significance of a historical resource as defined in CEQA Section 15064.5?

The 2010 EIR identified no known historic or potentially historic resources on the project site (Impact CULT-1; DEIR p. IV.E-14).

The Big Wave NPA proposed project has reduced the area to be developed on the north parcel and has limited development of the south parcel to boat storage and parking. The Big Wave NPA project would not result in a new significant or more severe impact than that identified in the 2010 EIR, and there are no new circumstances or information that require the evaluation of new mitigation measures or alternatives.

5.b. Cause a significant adverse change in the significance of an archaeological resource pursuant to CEQA Section 15064.5?

The 2010 EIR identified a prehistoric archeological site on the project property. Resource CA-SMA-151 is listed on the National Register of Historic Places and the California Register of Historic Resources (DEIR p. IV.E-4). Development of the project would occur within the mapped boundaries of CA-SMA-151 causing a potentially significant impact. Measure CULT-2a was required to protect the resource through avoidance or excavation and curation.

The Big Wave NPA project eliminates development in the portion of the south parcel known to contain an archaeological site (CA-SMA-151). The Big Wave NPA project incorporates avoidance measures identified in the Measure CULT-2a into the site development plan by creating an archaeological reserve on 0.70 acres of south parcel Lot 1 (Figure 4). Project activities in this area would be limited to agricultural uses associated with organic gardening in connection with the Wellness Center. Project impacts to CA-SMA-151 are fully avoided and no

further mitigation is required. Measure CULT-2a is no longer required and is deleted (see Attachment E).

The 2010 EIR identified Measures CULT-2b and CULT-2c to address accidental discovery of unrecorded archaeological deposits. These measures still apply to the Big Wave NPA project and fully address project impacts. The Big Wave NPA project would not result in a new significant or more severe impact than that identified in the 2010 EIR, and there are no new circumstances or information that require the evaluation of new mitigation measures or alternatives.

5.c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

The 2010 EIR concluded the project site does not contain unique geologic features and is not known to contain paleontological resources (DEIR p. IV.E-16). The 2010 EIR Measure CULT-3 was required to address discovery of unknown paleontological resources.

The Big Wave NPA project reduces development on the project properties. With this revised project, the same potential exists to discover unknown paleontological resources. Measure CULT-3 fully addresses this potential impact. The Big Wave NPA project would not result in a new significant or more severe impact than that identified in the 2010 EIR, and there are no new circumstances or information that require the evaluation of new mitigation measures or alternatives.

5.d. Disturb any human remains, including those interred outside of formal cemeteries?

The 2010 EIR addressed the project's potential to disturb human remains in Impact CULT-4 (DEIR p. IV.E-17). Handling discovery of human remains is addressed by Health and Safety Code Section 7050.5, Public Resources Code Section 5097.98, and Title 14 of the California Code of Regulations Section 16064.5(e). With these regulations in place, the 2010 EIR found impacts to human remains to be less than significant and no mitigation was required.

The Big Wave NPA project reduces development on the project properties. The revised project has the same potential to discover human remains. Compliance with existing regulations is sufficient to mitigate potential project impacts. The Big Wave NPA project would not result in a new significant or more severe impact than that identified in the 2010 EIR, and there are no new circumstances or information that require the evaluation of new mitigation measures or alternatives.

Sources:

Christopher A. Joseph & Associates. 2009. Big Wave Wellness Center and Office Park Draft Environmental Impact Report. SCH No. 2008102109. October 2009.

Christopher A. Joseph & Associates. 2010. Big Wave Wellness Center and Office Park Final Environmental Impact Report. SCH No. 2008102109. October 2010.

MacLeod and Associates. 2014. Civil Engineering Drawings. Sheet C-1 Vesting Tentative Map for Commercial and Residential Purposes "Big Wave". Sheet C2 Grading and Drainage Plan with Permanent Storm Water Controls. Sheet C-3 Utility Plan. Sheet C4 Sediment and Erosion Control Plan. Sheet C5 Detail Sheet. June 30, 2014.

4.6 GEOLOGY AND SOILS

<i>Would the project:</i>					
	<i>Where Impact was Analyzed in 2010 EIR</i>	<i>Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?</i>	<i>Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?</i>	<i>Any New Information Requiring New Analysis or Verification?</i>	<i>Do 2010 EIR Mitigation Measures Address/Resolve Impacts?</i>
6.a. Expose people or structures to potential significant adverse effects, including the risk of loss, injury, or death involving the following, or create a situation that results in:					
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other significant evidence of a known fault? <i>Note: Refer to Division of Mines and Geology Special Publication 42 and the County Geotechnical Hazards Synthesis Map.</i>	Impact GEO-1, DEIR pp. IV. F-10-11, 15, 17, 18 Topical Response 10: Final Geotechnical Report, FEIR pp. II-63-66	No. Proposed changes reduce the development footprint from 10.5 to 7.9 acres and clusters buildings on the north parcel.	No. A Fault Trench Study prepared after EIR certification found no evidence of fault traces on the project site.	No.	The 2010 EIR found Impact GEO-1 to be less than significant. No mitigation was required. The Big Wave NPA project does not create new significant or more severe impacts. No new mitigation is required.
ii. Strong seismic ground shaking?	Impact GEO-2, DEIR pp. IV.F-6-10, 15, 17, 8-19 Topical Response 10: Final Geotechnical Report, FEIR pp. II-63-66	No. Proposed changes reduce the development footprint from 10.5 to 7.9 acres and clusters buildings on the north parcel.	No.	No.	The 2010 EIR found Impact GEO-2 to be less than significant. No mitigation was required. The Big Wave NPA project does not create new significant or more severe impacts. No new mitigation is required.

<i>Would the project:</i>					
	Where Impact was Analyzed in 2010 EIR	<u>Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?</u>	<u>Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?</u>	<u>Any New Information Requiring New Analysis or Verification?</u>	<u>Do 2010 EIR Mitigation Measures Address/Resolve Impacts?</u>
iii. Seismic-related ground failure, including liquefaction and differential settling?	Impact GEO-3 and Impact GEO-4, DEIR pp. IV.F-6-10, 12-13, 17, 19-22 Topical Response 10: Final Geotechnical Report, FEIR pp. II-63-66	No. Proposed changes reduce the development footprint from 10.5 to 7.9 acres and cluster buildings on the north parcel.	No.	No.	The EIR found Impact GEO-3 and GEO-4 to be potentially significant. Measures GEO-3a and GEO-3b were required to reduce impacts related to seismic caused ground failure to less than significance. Measure GEO-4 was required to reduce impacts of differential settlement to less than significance. These measures fully address impacts associated with project changes. No new mitigation is required.
iv. Landslides?	DEIR pp. IV.F-13, 17, V-5 Topical Response 10: Final Geotechnical Report, FEIR pp. II-63-66	No. Proposed changes reduce the development footprint from 10.5 to 7.9 acres and cluster buildings on the north parcel.	No.	No.	The project site is not located in an area of high landslide susceptibility. The EIR found the impact to be less than significant. No mitigation is required.
v. Coastal cliff/bluff instability or erosion? <i>Note to reader: This question is looking at instability under current conditions. Future, potential instability is discussed in Section 7 (Climate Change).</i>	Not addressed in 2010 EIR. There are no coastal cliffs or bluffs on the project site.	No. Project changes reduce the development footprint from 10.5 to 7.9 acres and cluster buildings on the north parcel.	No.	No.	The project site is not located on or near coastal bluffs. The impact is less than significant. No mitigation is required.

<i>Would the project:</i>					
	<i>Where Impact was Analyzed in 2010 EIR</i>	<i>Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?</i>	<i>Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?</i>	<i>Any New Information Requiring New Analysis or Verification?</i>	<i>Do 2010 EIR Mitigation Measures Address/Resolve Impacts?</i>
6.b. Result in significant soil erosion or the loss of topsoil?	Impact GEO-5, DEIR pp. IV.F-14, 16, 17, 22 Topical Response 10: Final Geotechnical Report, FEIR pp. II-63-66	No. Proposed changes reduce site grading from 22,400 cubic yards of cut to 735 cubic yards of cut. Building pad and parking area elevations would be established by laying imported gravel as fill.	No.	No.	The 2010 EIR found Impact GEO-5 to be potentially significant. Measure HYDRO-3 was required to reduce the impact to less than significance. This measure fully addresses impacts associated with project changes. No new mitigation is required.
6.c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, severe erosion, liquefaction or collapse?	Impact GEO-3 and Impact GEO-4, DEIR pp. IV.F-6-10, 12-13, 17, 19-22 DEIR pp. IV.F-12-14, 17, V-5 Topical Response 10: Final Geotechnical Report, FEIR pp. II-63-66	No. Proposed changes reduce the development footprint from 10.5 to 7.9 acres.	No.	No.	See discussion of impacts related to landslide, lateral spreading, subsidence, severe erosion, liquefactions and collapse in sections iii, iv, and 6b above.
6.d. Be located on expansive soil, as noted in the 2010 California Building Code, creating significant risks to life or property?	Impact GEO-6, DEIR pp. IV.F-13-14, 15, 18, 22-24 Topical Response 10: Final Geotechnical Report, FEIR pp. II-63-66	No. Proposed changes reduce the development footprint 10.5 to 7.9 acres.	No.	No.	The 2010 EIR found Impacts GEO-6 to be potentially significant. Measure GEO-6 was required to reduce the impacts of expansive soil to less than significance. This measure fully address impacts associated with project changes. No new mitigation is required.

<i>Would the project:</i>					
	<i>Where Impact was Analyzed in 2010 EIR</i>	<i>Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?</i>	<i>Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?</i>	<i>Any New Information Requiring New Analysis or Verification?</i>	<i>Do 2010 EIR Mitigation Measures Address/Resolve Impacts?</i>
6.e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	Impact GEO-7, DEIR pp. IV.F-23-24	No. Proposed changes eliminate wastewater disposal through on-site drain fields. Sewer service would be provided by GSD. Site coverage with impervious and pervious surface from 10.5 to 7.9 acres reduce surface runoff volumes requiring infiltrating into project soils.	No.	No.	The 2010 EIR found Impacts GEO-7 to be potentially significant. Measure GEO-7 was required to reduce the impact to less than significance. This measure fully address impacts associated with project changes. No new mitigation is required.

Environmental and Regulatory Setting:

The Geology and Soils environmental and regulatory setting is presented in DEIR pp. IV.F-2 to IV.F-17. No changes in environmental setting have occurred since certification of the 2010 EIR. A Fault Trench Study (Attachment I) investigated the potential for traces of the Seal Cove Fault to exist on the project property. The study found no evidence of fault traces. Geologic conditions of the site remain as described in the 2010 EIR environmental setting.

Discussion:

Would the proposed project:

- 6.a. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:**
 - i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other significant evidence of a known fault?**

The 2010 EIR described the northwest corner of the north parcel as located within the Alquist-Priolo earthquake fault zone for the San Gregorio fault which runs through Pillar Marsh (DEIR p. IV.F-18). The project site is adjacent to the active Seal Cove fault (part of the San Gregorio fault zone), which is capable of producing shaking and damage. The 2010 EIR addressed potential fault rupture impacts in Impact GEO-1 and concluded that no structures were proposed within the fault zone and potential impacts on the north and south parcels were less than significant (FEIR Vol I p. II-64).

The Big Wave NPA project reduces the development footprint on the north parcel and eliminates structural development on the south parcel with the exception of a new small

restroom to serve the boat storage yard. These changes reduce the scope and severity of impacts from the Big Wave NPA to a level below that analyzed in the 2010 EIR. The Big Wave NPA project would not result in a new significant or more severe impact than that identified in the 2010 EIR, and there are no new circumstances or information that require the evaluation of new mitigation measures or alternatives.

LCP Policy 9.10 requires site-specific geotechnical investigations to determine mitigation measures for the remedy of geologic hazards. A geotechnical investigation of the project property was prepared by Sigma Prime GeoSciences, Inc. in 2012 (Attachment I). Trenching across the north parcel in an area proposed for Office Park and Wellness Center buildings showed no evidence of the Seal Cove fault traces. The geotechnical investigation concludes that the project development would not be subject to fault rupture hazards associated with the Seal Cove fault.

ii. Strong seismic ground shaking?

The 2010 EIR concluded seismic ground shaking could damage the proposed development and associated infrastructure. In conformance with 2007 California Building Code design parameters, project buildings must be designed and constructed to prevent collapse and to maintain reasonable ingress and egress of tenants, inhabitants and emergency response workers. With these regulations in place, the 2010 EIR determined impacts related to ground shaking were mitigated to a less-than-significant level in the 2010 EIR (FEIR Vol I p. II-64).

The Big Wave NPA project reduces the development footprint on the north parcel and eliminates structural development on the south parcel with the exception of a new small restroom to serve the boat storage yard. These changes reduce the scope and severity of impacts from the Big Wave NPA to a level below that analyzed in the 2010 EIR. The Big Wave NPA project would not result in a new significant or more severe impact than that identified in the 2010 EIR, and there are no new circumstances or information that require the evaluation of new mitigation measures or alternatives.

iii. Seismic-related ground failure, including liquefaction?

The 2010 EIR concluded differential ground settlement resulting from cyclic densification of loose sandy soils on the project site is a potentially significant impact. Measure GEO-3a (Attachment E) required a final geotechnical investigation for the project which would evaluate the potential for cyclic densification and develop final mitigation measures as needed. These measures would include over excavation of sandy soils and replacement with compacted engineered fill, application of deep soil compaction techniques, and designing of building foundations to accommodate total and differential ground settlement. The 2010 EIR concluded implementation of GEO-3a would mitigate impacts from cyclic densification to a less-than-significant level (FEIR Vol I pp. II-64-65).

The 2010 EIR found that impacts related to lateral spreading would be less than significant and that no mitigation was necessary.

The 2010 EIR found that there were potentially significant impacts from liquefaction-induced ground surface settlement and from surface manifestations of liquefaction such as sand boils or lurch cracking. Measures GEO-3b and GEO-4 (Attachment E) specified the industry standard methods to reduce seismic related ground failure and differential seismic settlement to a less-than-significant level (FEIR Vol I pp. II-64-65).

The Big Wave NPA project would construct buildings on pads of imported gravel rather than native soils. Measures GEO-3b and GEO-4 remain applicable and fully address the potential impacts associated with site conditions. The Big Wave NPA project would not result in a new significant or more severe impact than that identified in the 2010 EIR, and there are no new circumstances or information that require the evaluation of new mitigation measures or alternatives.

iv. Landslides?

The project site is relatively flat and not subject to landslides. The 2010 EIR identified the impact to be less than significant and no mitigation was required (FEIR Vol I pp. II-65).

The Big Wave NPA project does not introduce new landslide impacts. The Big Wave NPA project would not result in a new significant or more severe impact than that identified in the 2010 EIR, and there are no new circumstances or information that require the evaluation of new mitigation measures or alternatives.

v. Coastal cliff/bluff instability or erosion?

There are no coastal cliffs or bluffs within the project area. The 2010 EIR concluded there would be no direct or indirect impacts to coastal cliffs or bluffs as a result of the project.

The Big Wave NPA project does not introduce new impacts to coastal cliffs or bluffs. The Big Wave NPA project would not result in a new significant or more severe impact than that identified in the 2010 EIR, and there are no new circumstances or information that require the evaluation of new mitigation measures or alternatives.

6.b. Result in significant soil erosion or the loss of topsoil?

The 2010 EIR addressed soil erosion and the loss of topsoil in Impact GEO-5 (DEIR p. IV.F-22). The project involved substantial grading of 22,445 yds³ of cut and 26,050 yds³ of fill (FEIR Vol I pp. III.A-27-28). Altered drainage patterns from site grading, increased runoff from project pervious and impervious surfaces, and the exposure of disturbed soils could cause significant erosion impacts. Measure HYDRO-3 (Attachment E) required implementation of a Stormwater Pollution Prevention Plan (SWPPP) to control erosion of disturbed soils caused by storm water runoff and protect surface water quality. The 2010 EIR concluded that soil erosion and loss of topsoil impacts were mitigated to a less-than-significant level (FEIR Vol I, p. II-65).

The Big Wave NPA decreases soil disturbance and impervious surfaces from the project as described in the 2010 EIR. The proposed project is relatively flat. The building envelope on each parcel has been reduced. Cut and fill has been reduced by eliminating grading for building pads and parking areas. Grading is limited to 735 yds³ of cut for trenching and backfill of utilities. Drainage patterns and stormwater runoff volumes would still be altered by site construction; however disturbance of native soils is substantially reduced resulting in much reduced risk for soil erosion and loss of topsoil. Measure HYDRO-3 continues to mitigate the project's potential for erosion and loss of soil impacts to a less-than-significant level. The Big Wave NPA project would not result in a new significant or more severe impact than that identified in the 2010 EIR, and there are no new circumstances or information that require the evaluation of new mitigation measures or alternatives.

6.c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

See discussion in Responses 6.a.iii., 6.a.iv., and 6.b. above.

6.d. Be located on expansive soil, as noted in the 2010 California Building Code, creating significant risks to life or property?

The 2010 EIR described the project site as containing expansive soils which require further geotechnical assessment to determine building foundation design specifications. Measure GEO-6 (Attachment E) required this level of design detail to be provided to the County Engineer for review and approval prior to project development (building permit approval). The 2010 EIR concluded that soil erosion and loss of topsoil impacts were mitigated to a less-than-significant level (FEIR Vol I, p. II-65).

The Big Wave NPA project reduces the number of buildings proposed and restricts the development of Office Park and Wellness Center buildings to the north parcel. The amount of

building on expansive soil is reduced by the Big Wave NPA project. Measure GEO-6 remains sufficient to address project changes. The Big Wave NPA project would not result in a new significant or more severe impact than that identified in the 2010 EIR, and there are no new circumstances or information that require the evaluation of new mitigation measures or alternatives.

6.e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

The 2010 EIR addressed the suitability of the project soils to support the proposed wastewater drain fields and stormwater runoff infiltration basins in Impact GEO-7 (DEIR p. IV.F-23). Project soils are characterized as moderately deep, moderately to slowly permeable, with low infiltration rates and high water holding capacity. Portions of the site are mapped as imperfectly drained which indicates a potential for high water conditions (DEIR p. IV.N-3). The EIR concluded that expansive clay soils could cause ponding and required further design recommendations in Measure GEO-7. Wastewater drain field design parameters were specifically addressed in Impact UTIL-4 and Measure UTIL-4. The EIR concluded that implementation of Measure GEO-7 reduced soil impacts to a less than significant level.

The Big Wave NPA project eliminates the on-site wastewater treatment of use of wastewater drain fields. Sanitary sewer service would be provided by GSD. The Big Wave NPA project also reduces the development footprint resulting in reduced site coverage with impervious and pervious surfaces. As a result, the stormwater runoff volumes generated by the project is less than those analyzed in the certified EIR. Measure GEO-7 remains applicable and fully addresses the potential impacts of stormwater infiltration on expansive clay soils. The Big Wave NPA project would not result in a new significant or more severe impact than that identified in the 2010 EIR, and there are no new circumstances or information that require the evaluation of new mitigation measures or alternatives.

Sources:

Christopher A. Joseph & Associates. 2009. Big Wave Wellness Center and Office Park Draft Environmental Impact Report. SCH No. 2008102109. October 2009.

Christopher A. Joseph & Associates. 2010. Big Wave Wellness Center and Office Park Final Environmental Impact Report. SCH No. 2008102109. October 2010.

County of San Mateo. 2013. Local Coastal Program Policies. June 2013.

MacLeod and Associates. 2014. Civil Engineering Drawings. Sheet C-1 Vesting Tentative Map for Commercial and Residential Purposes "Big Wave". Sheet C2 Grading and Drainage Plan with Permanent Storm Water Controls. Sheet C-3 Utility Plan. Sheet C4 Sediment and Erosion Control Plan. Sheet C5 Detail Sheet. June 30, 2014.

MacLeod and Associates. 2014. NPA Landscaping Plan. Sheet 7 of 8. Undated.

Sigma Prime GeoSciences, Inc. 2014. Fault Trench Study, Big Wave Project, Half Moon Bay. April 28, 2014

4.7 CLIMATE CHANGE

<i>Would the project:</i>					
	<i>Where Impact was Analyzed in 2010 EIR</i>	<i>Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?</i>	<i>Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?</i>	<i>Any New Information Requiring New Analysis or Verification?</i>	<i>Do 2010 EIR Mitigation Measures Address/Resolve Impacts?</i>
7.a. Generate greenhouse gas (GHG) emissions (including methane), either directly or indirectly, that may have a significant impact on the environment?	Impact AQ-6, DEIR pp. IV.C-28- 36	No. Proposed changes reduce project scale and lower potential construction and operational emissions.	No.	No.	The 2010 EIR found Impact AQ-6 to be less than significant. No mitigation measures were required. The Big Wave NPA project does not create new significant or more severe impacts. No new mitigation is required.
7.b. Conflict with an applicable plan (including a local climate action plan), policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	Impact AQ-6, DEIR pp. IV.C-28- 36	No. Proposed changes reduce project scale and lower potential construction and operational emissions.	No.	Yes. San Mateo County adopted the Energy Efficiency Climate Action Plan (EECAP) in 2013. The plan sets GHG reduction requirements.	The 2010 EIR found Impact AQ-6 to be less than significant. No mitigation measures were required. The Big Wave NPA project does not create new significant or more severe impacts. No new mitigation is required.
7.c. Result in the loss of forestland or conversion of forestland to non-forest use, such that it would release significant amounts of GHG emissions, or significantly reduce GHG sequestering?	Not included in DEIR thresholds of significance	No. Proposed changes do not involve impacts to forestland or timberland.	No.	No.	The project site does not contain forestland or timberland. There is no impact. No mitigation is required.
7.d. Expose new or existing structures and/or infrastructure (e.g., leach fields) to accelerated coastal cliff/bluff erosion due to rising sea levels?	Not included in DEIR thresholds of significance	No. Proposed changes reduce the development footprint from 10.5 to 7.9 acres and cluster buildings on the north parcel.	No.	No.	The project site is not located on or near coastal bluffs. There is no impact. No mitigation is required.

<i>Would the project:</i>					
	<i>Where Impact was Analyzed in 2010 EIR</i>	<i>Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?</i>	<i>Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?</i>	<i>Any New Information Requiring New Analysis or Verification?</i>	<i>Do 2010 EIR Mitigation Measures Address/Resolve Impacts?</i>
7.e. Expose people or structures to a significant risk of loss, injury or death involving sea level rise?	FEIR pp. II-50, II-58, III.A-2, III.C-1, III.C-9	No. Proposed changes do not involve impacts from sea level rise.	No.	No.	The 2010 EIR concluded there were no significant impacts related to sea level rise. No mitigation was required.
7.f. Place structures within an anticipated 100-year flood hazard area as mapped on a Federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	Impact HYDRO-7, DEIR p. IV.H-59	No. Proposed changes do not involve mapped flood hazard areas.	No.	No.	The 2010 EIR concluded there were no flood hazard impacts. No mitigation was required.
7.g. Place within an anticipated 100-year flood hazard area structures that would impede or redirect flood flows?	Impact HYDRO-7, DEIR p. IV.H-59	No. Proposed changes do not involve mapped flood hazard areas.	No.	No.	The 2010 EIR concluded there were no impacts to impeding or redirecting flood flows. No mitigation was required.

Environmental and Regulatory Setting:

The Climate Change environmental and regulatory setting is presented in Air Quality for greenhouse gases (DEIR pp. IV.C-6-7 and IV.C-10-11) and In Hydrology & Water Quality for flooding (DEIR pp. IV.H-2-27). No substantial changes in environmental setting have occurred since certification of the 2010 EIR. FEMA maps and the 2005 LOMA have not substantially changed from that described in the 2010 EIR. Changes in the regulatory setting have occurred with San Mateo County’s adoption of the Energy Efficiency Climate Action Plan (EECAP) in 2013. The plan sets GHG reduction requirements and is addressed below.

Discussion:

Would the proposed project:

- 7.a. Generate greenhouse gas (GHG) emissions (including methane), either directly or indirectly, that may have a significant impact on the environment?**

The 2010 EIR summarized the requirements of the California Global Warming Solutions Act of 2006, or Assembly Bill 32, and the then current technical advice of the California Office of Planning and Research (OPR). Under Impact AQ-6, the 2010 EIR evaluated the significance of the project’s GHG emissions using the analytical approach recommended by the OPR, which was as follows:

- The EIR quantified (using URBEMIS and California Climate Action Registry protocols) the project’s construction and operation emissions.

- The EIR assessed whether the project's GHG emissions would conflict with applicable state, regional, and local GHG reduction goals. The EIR considered the project's GHG emissions, in terms of metric tons of carbon dioxide equivalents per year, in the context of the GHG reduction goals of AB 32, the California Air Resources Board's (CARB) 2008 Scoping Plan, and the OPR's recommended GHG mitigation measures (from its technical advisory document). The EIR found the project would be consistent with CARB Scoping Plan GHG reduction measures and OPR-recommended GHG mitigation measures and would therefore have a less-than-significant GHG impact.
- The EIR evaluated whether project elements would contribute to the efficiency of the project, thereby reducing potential GHG emissions. The EIR identified the applicant would pursue up to 35 green building principles and performance standards that would extensively reduce potential GHG emissions associated with the project and found project GHG emissions to be a less-than-significant impact.

The Big Wave NPA project does not involve changes that could result in a new significant impact or a substantially more severe impact than that considered in the 2010 EIR for the following reasons:

- Big Wave NPA Project construction involves less on-site development and total cut and fill activities (see Response 3.b.).
- Big Wave NPA Project operation involves the same type of residential, recreational, and commercial facilities considered in the 2010 EIR, but at less intensive development rates (see Response 3.b.).
- The County, using its Energy Efficiency Climate Action Plan (EECAP) Development Checklist, has determined the project is consistent with its 2013 EECAP.

There have not been substantial changes with respect to the circumstances under which the Big Wave NPA project would be undertaken that involve new significant or substantially more severe environmental effects than that identified in the 2010 EIR. GHG emissions in the San Francisco Bay Area Air Basin (SFBAAB) have not substantially changed from that described in the 2010 EIR (DEIR p. IV.C-7), although GHG emissions in the SFBAAB and the state in general have gradually lowered since the passage of AB 32 and adoption of the CARB 2008 Scoping Plan, and the project would remain subject to GHG reduction goals that are substantially the same as those considered in the 2010 EIR (DEIR pp. IV.C-10 to 13), although these goals are now implemented at the local and regional level as well as the state level.

In reviewing the Big Wave NPA project, the following new information related to GHG emissions was considered:

- 1) CARB approved the First Update to the Climate Change Scoping Plan.
- 2) The BAAQMD adopted a new air quality plan, the 2010 Clean Air Plan, and initiated the process to update the 2010 Clean Air Plan (see Response 3.a.).
- 3) The BAAQMD developed and published new significance thresholds for use by Lead Agencies conducting CEQA review (see Response 3.b.).
- 4) The Metropolitan Transportation Association and the Association of Bay Area Governments adopted a sustainable communities strategy to meet state GHG reduction goals, Plan Bay Area. Plan Bay Area sets forth two required and eight voluntary performance standards covering a wide array of topics and issues, including a seven percent reduction in per capita GHG emissions from cars and light duty trucks by 2020, and a 15 percent per capita reduction by 2035.

San Mateo County adopted its EECAP, a BAAQMD-defined qualified GHG Reduction Plan, and amended its General Plan to include an Energy and Climate Change Element. The GHG reduction goal set by the EECAP is a 17 percent reduction in GHG emissions below baseline

2005 levels by the year 2020. The EECAP focuses on GHG reductions in ten different areas such as energy efficiency and transportation.

The topics and issues addressed by this new information were generally known at the time of the 2010 EIR. For example, Senate Bill 375, which required adoption of the Plan Bay Area sustainable community strategy, was passed in 2008, and the BAAQMD began the process to update its CEQA Guidelines in April 2009 and issued revised draft CEQA Air Quality Guidelines document in September 2009. In addition, the County's EECAP is designed to achieve the overarching GHG reduction goals set by AB32, and is therefore consistent with AB32 and the CARB Scoping Plan. Therefore, this new information is not considered to be of substantial importance because it does not show the project would result in a new significant or substantially more severe significant environmental effect that could not have been known at the time the EIR was certified.

The 2010 EIR concluded the Big Wave Project would not conflict with or obstruct implementation of GHG reduction goals and would include elements that improve efficiency and reduce potential GHG emissions. The EIR, therefore, did not include mitigation for impact AQ-6. The Big Wave NPA project would not result in a new significant or more severe impact than that identified in the 2010 EIR, and there are no new circumstances or information that require the evaluation of new mitigation measures or alternatives.

7.b. Conflict with an applicable plan (including a local climate action plan), policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

The 2010 EIR evaluated the project's consistency with applicable plans, policies, and regulations adopted for the purpose of reducing GHGs in Impact AQ-6 (DEIR pp IV.C-28-36). The EIR assessed whether the project's GHG emissions would conflict with applicable state, regional, and local GHG reduction goals. The EIR considered the project's GHG emissions, in terms of metric tons of carbon dioxide equivalents per year, in the context of the GHG reduction goals of AB 32, the California Air Resources Board's 2008 Scoping Plan, and the California Office of Planning and Research's recommended GHG mitigation measures (from its technical advisory document). The 2010 EIR found the project would be consistent with CARB Scoping Plan GHG reduction measures and OPR-recommended GHG mitigation measures and would therefore have a less than significant GHG impact.

The Big Wave NPA is a reduced development project resulting in fewer construction emissions and fewer operational emissions. County planning staff, using the County's EECAP Development Checklist, have reviewed the Big Wave NPA Project against the checklist criteria and found criteria that are applicable to the project. Specifically, the project conforms to applicable criteria 1.4 (Tree Planting), 3.1 (Green Building Ordinance), 3.2 (Green Building Incentives), 3.3 (Urban Heat Island), 3.6 (Regional Energy Efficiency Efforts), 4.1 (Solar Photovoltaic Incentives), 4.2 (Solar Water Heater Incentives), 4.4 (Pilot Solar Program), 4.5 (Renewable Financing), 5.1 (General Plan and Zoning Updates), 5.3 (Pedestrian Design), 6.1 (Neighborhood Retail), 6.2 (Traffic Calming in New Construction), 6.4 (Expand Transit), 7.1 (Parking Ordinance), 8.1 (Employee Commute trip reductions), 8.3 (Employer Transit Subsidies), 8.4 (Work Shuttles), 10.1 (Low Carbon Fuel Infrastructure [electric vehicle charging stations]), 13.1 (Use of Recycled Materials), 13.2 (Zero Waste), 14.1 (Smart Water Meters), and 15.1 (Construction Idling). These energy efficient designs would serve to reduce the projects potential GHG emissions. See Attachment H for the EECAP Development Checklist prepared by County planning staff for the Big Wave NPA project. The project is considered in conformance with the EECAP and would therefore not result in a new or substantially more severe impact than that considered in the 2010 EIR.

There have not been substantial changes with respect to the circumstances under which the Big Wave NPA project would be undertaken that involve new significant or substantially more severe environmental effects than that identified in the 2010 EIR (see Response 7.a.). There is

no new information that shows the project would result in a new significant or substantially more severe significant environmental effect that could not have been known at the time the 2010 EIR was certified (see Response 7.a.). The Big Wave NPA project would not result in a new significant or more severe impact than that identified in the 2010 EIR, and there are no new circumstances or information that require the evaluation of new mitigation measures or alternatives.

7.c. Result in the loss of forestland or conversion of forestland to non-forest use, such that it would release significant amounts of GHG emissions, or significantly reduce GHG sequestering?

This significance threshold was adopted by San Mateo County in 2013 subsequent to certification of the 2010 EIR and is considered below.

The 2010 EIR determined the project area contains no forestland (DEIR p. V-6 under Mineral Resources discussion). The project would not result in timberland impacts. The Big Wave NPA project would not result in a new significant or more severe impact than that identified in the 2010 EIR, and there are no new circumstances or information that require the evaluation of new mitigation measures or alternatives.

7.d. Expose new or existing structures and/or infrastructure (e.g., leach fields) to accelerated coastal cliff/bluff erosion due to rising sea levels?

This significance threshold was adopted by San Mateo County in 2013 subsequent to certification of the 2010 EIR and is considered below.

There are no coastal cliffs or bluffs within the project area so there would be no direct or indirect impacts to coastal cliffs or bluffs as a result of the project. The Big Wave NPA project would not result in a new significant or more severe impact than that identified in the 2010 EIR, and there are no new circumstances or information that require the evaluation of new mitigation measures or alternatives.

7.e. Expose people or structures to a significant risk of loss, injury or death involving sea level rise?

The 2010 EIR determined the project would expose people or structures to a significance risk of loss, injury, or death involving sea level rise. As described in the FEIR (FEIR pp. II-50, II-58, III.A-2, III.C-1, III.C-9), the residential areas of the Wellness Center were designed above the estimated maximum elevation for sea level rise at 20 feet NGVD.

The Big Wave NPA project further increases the elevation of residential areas of the Wellness Center to 34 feet NGVD, further reducing risk of loss, injury or death involving sea level rise. Therefore, the Big Wave NPA project does not include changes that could result in a new significant impact or a substantially more severe impact than that considered in the 2010 EIR. According to Figure 19 of County's EECAP, the project site is not located in an area that would be exposed to approximate 20-, 44-, or 55-inch mean sea level rise. The Big Wave NPA project would not result in a new significant or more severe impact than that identified in the 2010 EIR, and there are no new circumstances or information that require the evaluation of new mitigation measures or alternatives.

7.f. Place structures within an anticipated 100-year flood hazard area as mapped on a Federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?

The 2010 EIR concluded that the Big Wave project site is not within a FEMA designated 100-year floodplain based on the 2005 Letter of Map Amendment (LOMA) and, therefore, should have no impacts in terms of placing housing within a 100-year flood hazard area and no mitigation was required.

The Big Wave NPA Project does not include changes that could result in a new significant impact or a substantially more severe impact than that considered in the 2010 EIR. There have not been substantial changes with respect to the circumstances under which the Big Wave NPA project would be undertaken that involve new significant or substantially more severe environmental effects than that identified in the EIR. The environmental and regulatory setting of the Big Wave NPA project is generally the same as described in the 2010 EIR. No new impacts would occur and no new mitigation measures are required.

7.g. Place within an anticipated 100-year flood hazard area structures that would impede or redirect flood flows?

The 2010 EIR concluded that the Big Wave project site is not within a FEMA designated 100-year floodplain based on the 2005 LOMA and, therefore, any development on these parcels should have no impact in regards to impeding or redirecting flood flows and no mitigation was required.

The Big Wave NPA project does not include changes that could result in a new significant impact or a substantially more severe impact than that considered in the 2010 EIR. There have not been substantial changes with respect to the circumstances under which the Big Wave NPA project would be undertaken that involve new significant or substantially more severe environmental effects than that identified in the EIR. The environmental and regulatory setting of the Big Wave NPA project is generally the same as described in the 2010 EIR. No new impacts would occur and no new mitigation measures are required.

Sources:

Association of Bay Area Governments and Metropolitan Transportation Commission (ABAG/MTC). 2013. Bay Area Plan: Strategy for a Sustainable Region. Adopted July 18, 2013.

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Christopher A. Joseph & Associates. 2009. Big Wave Wellness Center and Office Park Draft Environmental Impact Report. SCH No. 2008102109. October 2009.

Christopher A. Joseph & Associates. 2010. Big Wave Wellness Center and Office Park Final Environmental Impact Report. SCH No. 2008102109. October 2010.

County of San Mateo. 2013. Energy Efficiency Climate Action Plan. June 2013.

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MacLeod and Associates. 2014. Civil Engineering Drawings. Sheet C-1 Vesting Tentative Map for Commercial and Residential Purposes "Big Wave". Sheet C2 Grading and Drainage Plan with Permanent Storm Water Controls. Sheet C-3 Utility Plan. Sheet C4 Sediment and Erosion Control Plan. Sheet C5 Detail Sheet. June 30, 2014.

4.8 HAZARDS AND HAZARDOUS MATERIALS

<i>Would the project:</i>					
	<i>Where Impact was Analyzed in 2010 EIR</i>	<i>Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?</i>	<i>Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?</i>	<i>Any New Information Requiring New Analysis or Verification?</i>	<i>Do 2010 EIR Mitigation Measures Address/Resolve Impacts?</i>
8.a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials (e.g., pesticides, herbicides, other toxic substances, or radioactive material)?	Impact HAZ-1, DEIR pp. IV.G-8-9, 20-21	No. Proposed changes eliminate the on-site wastewater treatment plant and any hazardous materials associated with the plant.	No.	No.	The 2010 EIR found Impact HAZ-1 to be less than significant. No mitigation was required. The Big Wave NPA project does not create new significant or more severe impacts. No new mitigation is required.
8.b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	Impact HAZ-2, DEIR pp. IV.G-13-14, 15-16, 22-24 Impact AQ-2e, DEIR p. IV.C-25	No. Proposed changes eliminate the on-site wastewater treatment plant and any hazardous materials associated with the plant.	No.	No.	The 2010 EIR found Impact HAZ-2 to be potentially significant. Measure HAZ-2 was required to reduce the impact to less than significance. This measure fully addresses impacts associated with project changes. No new mitigation is required.
8.c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	DEIR p. V-6	No. Proposed changes do not involve hazardous risks to local schools.	No.	No.	The project site is not located within one-quarter mile of an existing or proposed school. There is no impact. No mitigation is required.
8.d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	DEIR, p. V-6	No. Proposed changes do not involve hazardous materials sites.	No.	No.	The project site is not located on a site listed as containing hazardous materials. There is no impact. No mitigation is required.

<i>Would the project:</i>					
	<i>Where Impact was Analyzed in 2010 EIR</i>	<i>Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?</i>	<i>Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?</i>	<i>Any New Information Requiring New Analysis or Verification?</i>	<i>Do 2010 EIR Mitigation Measures Address/Resolve Impacts?</i>
8.e. For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, result in a safety hazard for people residing or working in the project area?	Impact HAZ-3, DEIR pp. IV.G-9-11, 16-17 Impact LU-2, DEIR p. IV.I-36 Topical Response 14: Location of Project Near Half Moon Bay Airport, FEIR pp. II-74-80 FEIR Vol I p. III.B-22	No. Proposed changes remove a storage building of the Half Moon Bay Airport Overlay Zone. Wellness Center residential buildings are setback 150 feet from the Airport Overlay Zone on the north parcel.	No.	Yes. The Draft Final Airport Land Use Compatibility Plan for the Environs of the Half Moon Bay was published August 2013.	The 2010 EIR found Impacts HAZ-3 and LU-2 to be less than significant. However, a navigational easement was required in Measure HAZ-3 to ensure impacts remain less than significant. Measure LU-3 was also required to comply with recommendations of the State Department of Transportation, Division of Aeronautics. These measures fully addresses impacts associated with project changes. No new mitigation is required.
8.f. For a project within the vicinity of a private airstrip, result in a safety hazard for people residing or working in the project area?	DEIR p. V-6	No. Proposed changes are not located in vicinity of a private airstrip.	No.	No.	The 2010 EIR found the project is not in vicinity of a private airstrip. There is no impact. No mitigation is required.
8.g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	Impact HAZ-4, DEIR pp. IV.G-9, 26 Topical Response 9: Tsunami Hazard, FEIR pp. II-57-61 FEIR p. III-A.26-27	No. Proposed changes do not alter emergency evacuation plans. Project changes improve protection from tsunami risk by elevating residential units to upper building floors.	No.	No.	The 2010 EIR found Impact HAZ-4 to be less than significant. No mitigation measures were required. The Big Wave NPA project does not create new significant or more severe impacts. No new mitigation is required.

<i>Would the project:</i>					
	<i>Where Impact was Analyzed in 2010 EIR</i>	<i>Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?</i>	<i>Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?</i>	<i>Any New Information Requiring New Analysis or Verification?</i>	<i>Do 2010 EIR Mitigation Measures Address/Resolve Impacts?</i>
8.h. Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	Impact HAZ-5, DEIR p. IV.G-6-7, 26-27	No. Proposed changes reduce the number of Office Park workers on the project site.	No.	No.	The 2010 EIR found Impact HAZ-5 to be less than significant. No mitigation measures were required. The Big Wave NPA project does not create new significant or more severe impacts. No new mitigation is required.
8.i. Place housing within an existing 100-year flood hazard area as mapped on a Federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	Impact HYDRO-7, DEIR p. IV.H-59	No. Proposed changes are not located within a FEMA designated 100-year flood plain.	No. FEMA maps and the 2005 LOMA have not substantially changed from that described in the 2010 EIR (pp. IV.H-2-27).	No.	The 2010 EIR found the project is not located within a FEMA designated 100-year flood plain. There is no impact. No mitigation is required.
8.j. Place within an existing 100-year flood hazard area structures that would impede or redirect flood flows?	Impact HYDRO-7, DEIR p. IV.H-59	No. Proposed changes are not located within a FEMA designated 100-year flood plain.	No. FEMA maps and the 2005 LOMA have not substantially changed from that described in the 2010 EIR (pp. IV.H-2-27).	No.	The 2010 EIR found the project is not located within a FEMA designated 100-year flood plain. There is no impact. No mitigation is required.
8.k. Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	Impact HYDRO-8, DEIR, p. IV.H-60	No.	No, the risk from flooding due to dam failure has not substantially changed from that described in the 2010 EIR (pp. IV.H-2-27).	No.	The 2010 EIR found Impact HYDRO-8 to be less than significant. No mitigation was required. The Big Wave NPA project does not create new significant or more severe impacts. No new mitigation is required.

<i>Would the project:</i>					
	<i>Where Impact was Analyzed in 2010 EIR</i>	<i>Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?</i>	<i>Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?</i>	<i>Any New Information Requiring New Analysis or Verification?</i>	<i>Do 2010 EIR Mitigation Measures Address/Resolve Impacts?</i>
8.I. Inundation by seiche, tsunami, or mudflow?	Impact HYDRO-9, DEIR pp. IV.H-19-22, 40, 60-61 Topical Response 9: Tsunami Hazard, FEIR pp. II-57-63.	No. Proposed changes raise the floor elevation of residential units within the Wellness Center to 34 feet NGVD or higher. See Table 3 Office Park and Wellness Center, Building Elevations.	No.	No.	The 2010 EIR found Impact HYDRO-9 to be potentially significant. Measure HYDRO-9 was required to reduce the impact to less than significance. This measure fully addresses impacts associated with project changes. No new mitigation is required.

Environmental and Regulatory Setting:

The Hazards & Hazardous Materials environmental and regulatory setting is discussed in DEIR pp. IV-G-1 to IV.G-17. No changes have occurred in the setting since certification of the 2010 EIR.

Discussion:

Would the proposed project:

- 8.a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials (e.g., pesticides, herbicides, other toxic substances, or radioactive material)?**

The 2010 EIR concluded that large quantities of hazardous materials would not be present on site and risk of upset would be minimal (DEIR pp. IV.G-20-21). No mitigation was required.

The Big Wave NPA project eliminates the on-site wastewater treatment plant. As a result, hazardous chemicals used to treat wastewater would no longer be present on the site. This reduces the amount of hazardous materials on the site to levels below those analyzed in the 2010 EIR. The Big Wave NPA project would not result in a new significant or more severe impact than that identified in the 2010 EIR, and there are no new circumstances or information that require the evaluation of new mitigation measures or alternatives.

- 8.b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?**

The 2010 EIR addressed risk of upset associated with the routine use and disposal of hazardous materials in Impact HAZ-1 (DEIR p. IV.G-21) and Impact AQ-2e (DEIR p. IV.C-25). The impact was found less than significant. The 2010 EIR addressed the accidental release of hazardous materials in Impact HAZ-2 (DEIR pp. IV.G-22-24). The EIR concluded non-point source contaminants originating from properties northeast of the project site (e.g. Half Moon Bay Airport) could transport hazardous substances onto the project site. Chlorinated solvents (PCE and TCE) in groundwater hydraulically upgradient and north of the site may also occur on the project site due to groundwater pumping from the on-site well. These impacts were

determined to be less than significant. The EIR identified the likely presence of pesticides due to agricultural use of the property. The presence of pesticides qualifies as a recognized environmental condition. Project construction workers and nearby residences and businesses could be exposed to pesticides during soil grading activity. Measure HAZ-2 required a Phase II Environmental Site Assessment to determine if whether hazardous substances are present in the soil and needs to be transported off the project site. The EIR concluded Measure HAZ-2 mitigates potential impacts related to the release of potential pesticides into the environment to a less-than-significant level.

The Big Wave NPA project eliminates rough grading needed for building pads and parking areas. Total grading is reduced from 22,748 yd³ of cut and 26,850 yd³ of fill to 735 yd³ of cut and backfill for utility trenches. This reduction in soil disturbance decreases potential exposure of construction workers and nearby residences and businesses to pesticides if present in the project soils. Most of the soil excavated for trenching is sub-surface and less likely to contain pesticides. However, Measure HAZ-2 remains applicable and fully addresses the potential impacts of pesticides in project soils. The Big Wave NPA project would not result in a new significant or more severe impact than that identified in the 2010 EIR, and there are no new circumstances or information that require the evaluation of new mitigation measures or alternatives.

8.c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or hazardous waste within one-quarter mile of an existing or proposed school?

The 2010 EIR (DEIR p. V-6) found the project would not emit hazardous emissions or involve handling hazardous or acutely hazardous materials, substances or waste within one-quarter mile of an existing or proposed school. The closest school is the Picasso Preschool, one mile southeast of the project site. The Big Wave NPA project would not result in a new significant or more severe impact than that identified in the 2010 EIR, and there are no new circumstances or information that require the evaluation of new mitigation measures or alternatives.

8.d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

The 2010 EIR (DEIR p. V-6) found that the project site is not located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. The Phase I Environmental Site Assessment determined that the project is not located on a site that is included on a list of hazardous materials sites.

Based on a recent database search of the Department of Toxic Substances Control Envirostor Database website, no new hazardous material sites have been listed affecting the project site. The Big Wave NPA project would not result in a new significant or more severe impact than that identified in the 2010 EIR, and there are no new circumstances or information that require the evaluation of new mitigation measures or alternatives.

8.e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?

The 2010 EIR addressed hazards associated with operations at the Half Moon Bay Airport in Impact HAZ-3 (DEIR p. IV.G-24-25; FEIR Vol I pp. II-74-80, III.B-7-8, III.C-10-11). The project falls within 100 feet of the Approach Protection Zone (APZ) of the southern approach (Runway 30). A Communications Building in the Office Park on the north parcel and a Storage Building associated with the Wellness Center on the south parcel were located within the Airport APZ. The EIR concluded these structures were allowed uses as designated by the approved (1996) Airport Land Use Compatibility Plan and were therefore consistent with the AO setback.

Architectural and design features such as microwave dishes, solar panels, building surfaces and exterior lights would be designed so as to not create a visual interference for aircraft navigation. The EIR concluded that full compliance with all applicable federal, state, regional, and local regulations would reduce project impacts to a less-than-significant level and no further mitigation was required.

The Big Wave NPA project removes all structures from within the Airport Overlay setback and reduces building heights. Residential structures have been moved to the north parcel and further setback from the APZ. As a result the Big Wave NPA impacts are below the levels analyzed in the 2010 EIR. Measure HAZ-3 remains applicable and fully addresses project impacts. The Big Wave NPA project would not result in a new significant or more severe impact than that identified in the 2010 EIR, and there are no new circumstances or information that require the evaluation of new mitigation measures or alternatives.

8.f. For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

The 2010 EIR (DEIR p. V-6) found the project would not be within the vicinity of a private airstrip, exposing people residing or working in the project areas to excessive noise levels and this remains the case with the NPA. The Big Wave NPA project would not result in a new significant or more severe impact than that identified in the 2010 EIR, and there are no new circumstances or information that require the evaluation of new mitigation measures or alternatives.

8.g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

The 2010 EIR addressed impacts to adopted emergency response plans and emergency evacuation plans in Impact HAZ-4 (DEIR p. IV.G-26; FEIR Vol I pp. II-57-61; FEIR p. III.A.26-27). The project includes a tsunami evacuation plan to be submitted to the County Sheriff's Office of Emergency Services (OES). Biannual evacuation training exercises would occur, and buildings would be designed for vertical evacuation (FEIR Vol I pp III.A-26-37). The EIR concluded the impact was less than significant and no mitigation was required.

The Big Wave NPA project does not propose a change in project evacuation plans. The impact remains the same as described in the 2010 EIR. The Big Wave NPA project would not result in a new significant or more severe impact than that identified in the 2010 EIR, and there are no new circumstances or information that require the evaluation of new mitigation measures or alternatives.

8.h. Expose people or structures to a significant risk of loss, injury, or death involving wild land fires, including where wild lands are adjacent to urbanized areas or where residences are intermixed with wild lands?

The 2010 EIR addressed hazards associated with wildfires in Impact HAZ-5 (DEIR p. IV.G-26). The project site is located within a Community at Risk zone – neighborhoods or communities that interface with wildlands. Development of new buildings located within an area designated to be at significant risk from wildfires must meet the intent of California Building Code Chapter 7A, Materials and Construction Methods for Exterior Wildfire Exposure. The 2010 EIR determined that project compliance with these requirements, as determined by the County and Coastside Fire Protection District during the building permit process, is sufficient to reduce the risk of wildland fire to less than significance. No mitigation was required.

The Big Wave NPA project reduces the number of buildings and Office Park employees exposed to the risk of wildland fire. As a result the Big Wave NPA impacts are below the levels analyzed in the 2010 EIR. The risk remains less than significant and no new mitigation is required as a result of project changes. The Big Wave NPA project would not result in a new significant or more severe impact than that identified in the 2010 EIR, and there are no new circumstances or information that require the evaluation of new mitigation measures or

alternatives. The adequacy of water supply facilities for fire suppression is discussed in Response 17.b.

8.i. Place housing within an existing 100-year flood hazard area as mapped on a Federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?

The 2010 EIR discussed potential impacts related to 100-year flood hazard areas in Impact HYDRO-7 (DEIR p. IV.H-59). The 2010 EIR concluded that the Big Wave project site is not within a FEMA designated 100-year floodplain based on the 2005 LOMA and therefore development on these parcels should have no impacts in terms of placing housing within a 100-year flood hazard area. No mitigation was required.

The Big Wave NPA Project does not include changes that could result in a new significant impact or a substantially more severe impact than that considered in the 2010 EIR. There have not been substantial changes with respect to the circumstances under which the Big Wave NPA project would be undertaken that involve new significant or substantially more severe environmental effects than that identified in the EIR. No new impacts would occur and no new mitigation measures are required.

8.j. Place within an existing 100-year flood hazard area structures that would impede or redirect flood flows?

The 2010 EIR discussed potential impacts related to 100-year flood hazard areas in Impact HYDRO-7 (DEIR p. IV.H-59). The 2010 EIR concluded that the Big Wave project site is not within a FEMA designated 100-year floodplain based on the 2005 LOMA and therefore development on these parcels should have no impacts in regards to impeding or redirecting flood flows. No mitigation was required.

The Big Wave NPA Project does not include changes that could result in a new significant impact or a substantially more severe impact than that considered in the 2010 EIR. There have not been substantial changes with respect to the circumstances under which the Big Wave NPA project would be undertaken that involve new significant or substantially more severe environmental effects than that identified in the EIR. No new impacts would occur and no new mitigation measures are required.

8.k. Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?

The 2010 EIR evaluated the potential to expose people and structures to a significant risk of loss, injury or death involving flooding as a result of the failure of a dam, specifically the Denniston Reservoir Dam in Impact HYDRO-8 (DEIR p. IV.H-60). At its closest point, the project site is 2,300 feet from the main channel of Denniston Creek. The project area is not located within the Denniston Creek watershed, being separated by a small ridge. No other flood sources, including levees, are known to affect the project area. The EIR concluded the project had a less-than-significant impact in terms of exposing people or structures to flooding as a result of dam or levee failure.

The Big Wave NPA Project does not include changes that could result in a new significant impact or a substantially more severe impact than that considered in the 2010 EIR. There have not been substantial changes with respect to the circumstances under which the Big Wave NPA project would be undertaken that involve new significant or substantially more severe environmental effects than that identified in the EIR. No new impacts would occur and no new mitigation measures are required.

8.l. Inundation by seiche, tsunami, or mudflow?

The 2010 EIR concluded the Big Wave project would create a potentially significant risk to residential and commercial structures within a mapped tsunami area, due to its proximity to the

Pacific Ocean. The proximity of the project to Pillar Point Harbor and the potential for tsunami events could expose people to inundation by seiche, which represents a potentially significant impact (Impact HYDRO-9; DEIR p. IV.H-60-61). The project was redesigned to raise the floor elevation of residential units from 18 to 20 feet to be five feet above the maximum recorded tsunami height of 14.35 feet NGVD (FEIR Vol I p. III.A-2). Project planting of trees and shrubs in the wetland area would act as a tsunami barrier providing additional protection from loss of life and property damage (FEIR Vol I p. III.A-23). The EIR concluded implementation of Measure HYDRO-9 (Attachment E) would reduce impacts from exposure to tsunami and seiche to a less-than-significant level. The 2010 EIR additionally concluded the project site has little potential for mudflow given the project vicinity is flat (DEIR p. IV.H-61) and that the project would not expose people or structures to a significant risk of inundation by mudflows.

The project applicant evaluated tsunami risk in a report submitted to San Mateo County (Holmes 2010). The report was peer reviewed by David Skelly (GeoSoils 2010). Mr. Skelly evaluated the risk of a design tsunami height of 6.5 feet and concluded the site is reasonably safe from tsunamis due to the breakwater, the one mile set back from the breakwater, and elevation above the potential flood levels. If a tsunami reaches the site the bore would be less than one foot in height with no significant force. The finished floors for both the Wellness Center and the Office Park buildings are reasonably safe from tsunami inundation due to their elevation above finished grade.

The Big Wave NPA has modified the project design by moving all Wellness Center buildings from the south parcel to the north parcel. This increases the natural grade elevation by four feet (from 14 to 18 feet NGVD; DEIR Figures III-2A and III-2B) and increases the distance from the shoreline to the closest portion of the Wellness Center site from about 1,300 feet to 2,000 feet. All residential structures have been raised to a minimum height of 34 feet NGVD by placing them on the second floor (see Table 3 Office Park and Wellness Center, Building Elevations).

The maximum tsunami wave height is estimated at 28 feet NGVD based on the elevations of the inundation zone depicted on the California Emergency Management Agency (CalEMA) Tsunami Inundation Map. At 34 feet NGVD, the Big Wave NPA residential units would be six feet above inundation water levels. This ensures that all residential units would be at least two feet above inundation water levels as required by LCP Policy 9.3 and County Zoning Regulations Section 6326.2(b). These project modifications incorporate the requirements of Measure HYDRO-9 and reduce project impacts to a level below those analyzed in the 2010 EIR. This measure fully addresses impacts associated with the Big Wave NPA project. The Big Wave NPA project would not result in a new significant or more severe impact than that identified in the 2010 EIR, and there are no new circumstances or information that require the evaluation of new mitigation measures or alternatives.

Sources:

Coastside Fire Protection District. 2014. Letter to Scott Holmes, Big Wave LLC. April 16, 2014.

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Christopher A. Joseph & Associates. 2010. Big Wave Wellness Center and Office Park Final Environmental Impact Report. SCH No. 2008102109. October 2010.

Coffman Associates. 2013. Airport Land Use Compatibility Plan for the Environs of Half Moon Bay Airport in San Mateo County, California. Prepared for City/County Association of Governments of San Mateo County (C/CAG) Board of Directors in its Designated Role as the Airport Land Use Commission. Draft Final. August 2013.

County of San Mateo. 2013. Local Coastal Program Policies. June 2013.

GeoSoils, Inc. 2010. Letter to Jeff Peck, Big Wave Group. Subject: Tsunami Runup and Force Analysis for Big Wave Wellness Center, Airport Street, Princeton, San Mateo County, California. October 14, 2010

Holmes, Scott. 2010. Big Wave Tsunami Force and Runup Report in Accordance with Zoning Ordinance 6326.2 (8-20-2010). August 23, 2010.

MacLeod and Associates. 2014. Civil Engineering Drawings. Sheet C-1 Vesting Tentative Map for Commercial and Residential Purposes "Big Wave". Sheet C2 Grading and Drainage Plan with Permanent Storm Water Controls. Sheet C-3 Utility Plan. Sheet C4 Sediment and Erosion Control Plan. Sheet C5 Detail Sheet. June 30, 2014.

Treadwell & Rollo. 2007. Phase I Environmental Site Assessment. Big Wave Project South of Airport Street, Princeton-by-the-Sea, California. Prepared for Christopher A. Joseph & Associates. March 26, 2007.

4.9 HYDROLOGY AND WATER QUALITY

<i>Would the project:</i>					
	<i>Where Impact was Analyzed in 2010 EIR</i>	<i>Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?</i>	<i>Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?</i>	<i>Any New Information Requiring New Analysis or Verification?</i>	<i>Do 2010 EIR Mitigation Measures Address/Resolve Impacts?</i>
9.a. Violate any water quality standards or waste discharge requirements (consider water quality parameters such as temperature, dissolved oxygen, turbidity and other typical stormwater pollutants (e.g., heavy metals, pathogens, petroleum derivatives, synthetic organics, sediment, nutrients, oxygen-demanding substances, and trash)?	Impact HYDRO-1, DEIR pp. IV.H-47-48	No. Proposed changes eliminate the on-site wastewater treatment plant and on-site disposal of wastewater.	No.	Yes. The County's Midcoast LCP Update was approved by the CCC in 2012. New LCP Policy 1.35 and Appendix A.1 was added governing new land development protect coastal water quality.	The 2010 EIR concluded Impact HYDRO-1 was less than significant. No mitigation was required. The Big Wave NPA project does not create new significant or more severe impacts. No new mitigation is required. Assessment of the new information (updated LCP policies) does not reveal new project impacts requiring mitigation.
9.b. Significantly deplete groundwater supplies or interfere significantly with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	Impact HYDRO-2, DEIR pp. IV.H-48-51	No. Proposed changes reduce domestic water demand (excluding irrigation) supplied by groundwater from 26,000 gpd (10,000 gpd potable and 16,000 gpd recycled) to 9,765 gpd. Impervious surfaces are reduced from 3.0 acres to 2.5 acres and pervious surfaces (walkways and parking) from 7.5 acres to 5.4 acres. Domestic water would be supplied from MWSD sources rather than an	No.	No.	The 2010 EIR concluded Impact HYDRO-2 was less than significant. No mitigation was required. The Big Wave NPA project does not create new significant or more severe impacts. No new mitigation is required.

<i>Would the project:</i>					
	<i>Where Impact was Analyzed in 2010 EIR</i>	<i>Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?</i>	<i>Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?</i>	<i>Any New Information Requiring New Analysis or Verification?</i>	<i>Do 2010 EIR Mitigation Measures Address/Resolve Impacts?</i>
		on-site well. Fire suppression water would be supplied by MWSD rather than CCWD.			
9.c. Significantly alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner that would result in significant erosion or siltation on- or off-site?	Impact HYDRO-3, DEIR pp. IV.H-51-53	No. Proposed changes reduce the development footprint and eliminate grading for building pads and parking areas. Proposed changes do not involve the alteration of the course of a stream or river.	No.	Yes. The County's Midcoast LCP Update was approved by the CCC in 2012. New LCP Policy 1.35 and Appendix A.1 was added governing new land development protect coastal water quality.	The 2010 EIR found Impact HYDRO-3 to be potentially significant. Measure HYDRO-3 requires the submittal of a stormwater pollution prevention plan (SWPPP) to reduce the impact to less than significance. This measure fully addresses impacts associated with project changes. No new mitigation is required.
9.d. Significantly alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or significantly increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site?	Impact HYDRO-4, DEIR pp. IV.H-53-54	No. Proposed changes reduce the development footprint and eliminate grading for building pads and parking areas. Proposed changes do not involve the alteration of the course of a stream or river.	No.	No.	The 2010 EIR found Impact HYDRO-4 to be potentially significant. Measure HYDRO-4 requires the applicant to submit a drainage report and plans to reduce the impact to less than significance. This measure fully addresses impacts associated with project changes. No new mitigation is required.

<i>Would the project:</i>					
	<i>Where Impact was Analyzed in 2010 EIR</i>	<i>Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?</i>	<i>Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?</i>	<i>Any New Information Requiring New Analysis or Verification?</i>	<i>Do 2010 EIR Mitigation Measures Address/Resolve Impacts?</i>
9.e. Create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide significant additional sources of polluted runoff?	Impact HYDRO-5, DEIR pp. IV.H-54-58	No. Proposed changes reduce the developed surfaces generating polluted runoff from 10.5 to 7.9 acres.	No.	Yes. The County's Midcoast LCP Update was adopted by the CCC in 2012. New LCP Policy 1.35 and Appendix A.1 was added governing new land development protect coastal water quality.	The 2010 EIR found Impact HYDRO-5 to be potentially significant. Measure HYDRO-5 requires the submittal of an erosion control plan and SWPPP to reduce the impact to less than significance. Measure HYDRO-5 is amended to eliminate references to structural BMPs removed from the project design prior to the Final EIR. This measure fully addresses impacts associated with project changes. No new mitigation is required.
9.f. Significantly degrade surface or groundwater water quality?	Impact HYDRO-6, DEIR pp. IV.H-58-59	No. Project changes reduce the developed surfaces generating polluted runoff. Project changes eliminate discharge of treated wastewater to on-site drain fields and use of recycle water as irrigation.	No.	No.	The 2010 EIR found that Impact HYDRO-6 was potentially significant. Measure HYDRO-5 required to address surface water quality addressed groundwater quality impacts related to surface water sources. Measure HYDRO-6 addressed unused wells as a potential source of contaminants and has been amended to allow use of the well for landscaping, gardening, and agricultural uses. These measures fully address impacts associated with project changes. No new

<i>Would the project:</i>					
	<i>Where Impact was Analyzed in 2010 EIR</i>	<i>Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?</i>	<i>Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?</i>	<i>Any New Information Requiring New Analysis or Verification?</i>	<i>Do 2010 EIR Mitigation Measures Address/ Resolve Impacts?</i>
					mitigation is required.
9.g. Result in increased impervious surfaces and associated increased runoff?	Impact HYDRO-3, DEIR pp. IV.H-51-53 Impact HYDRO-4, DEIR pp. IV.H-53-54 Impact HYDRO-5, DEIR pp. IV.H-54-58	No. Project changes reduce impervious surfaces from 3.0 acres to 2.5 acres and pervious surfaces (walkways and parking) from 7.5 acres to 5.4 acres.	No.	No.	The 2010 EIR found that Impacts HYDRO-3, HYDRO-4, and HYDRO-5 were potentially significant. Measures HYDRO-3, HYDRO-4, and HYDRO-5 require implementation of a Storm Water Pollution Prevention Plan (SWPPP) and BMPs to address post-construction erosion and drainage controls. Measure HYDRO-5 is amended to eliminate references to structural BMPs removed from the project design prior to the Final EIR. These measures fully address impacts associated with project changes. No new mitigation is required.

Environmental and Regulatory Setting:

The Hydrology and Water Quality environmental and regulatory setting is presented in DEIR pp. IV.H-2 to IV.H-39. No substantial changes in existing drainage patterns, ground water conditions, or water use on the site have occurred since certification of the 2010 EIR.

Discussion:

Would the proposed project:

- 9.a. Violate any water quality standards or waste discharge requirements (consider water quality parameters such as temperature, dissolved oxygen, turbidity and other typical stormwater pollutants (e.g., heavy metals, pathogens, petroleum derivatives, synthetic organics, sediment, nutrients, oxygen-demanding substances, and trash))?**

The 2010 EIR addressed the potential for violation of water quality standards in Impact HYDRO-1 (DEIR p. IV.H-47-48). The project site drains to a drainage swale between the project parcels,

to Pillar Point Marsh, and ultimately to the Fitzgerald Marine Reserve, or James V. Fitzgerald Area of Special Biological Significance (ASBS). The 2010 EIR evaluated the proposed on-site wastewater plant and the potential for violating waste discharge requirements and concluded that there would be a less-than-significant impact due to the requirements of the Waste Discharge Requirements permit. The wet weather connection to the GSD was considered to be capable of treating the project's wastewater contribution and, therefore, the project's wastewater contribution would be covered under the existing waste discharge permit for that facility and thus meet applicable water quality criteria of its treated wastewater discharge. The project's design and incorporation of BMPs were found adequate to reduce impacts associated with non-point source pollution from increased stormwater runoff. The 2010 EIR concluded the impacts were less than significant and no mitigation was required.

The Big Wave NPA eliminates the use of an on-site wastewater treatment plant and proposes wastewater service by GSD. The on-site well would be used for irrigation purposes only. As a result, potential project impacts due to an on-site wastewater treatment plant are entirely eliminated. The connection to the GSD is anticipated to be capable of treating the project's wastewater contribution and therefore, the project's wastewater contribution would be covered under the existing waste discharge permit for that facility and thus meet applicable water quality criteria of its treated wastewater discharge. The Big Wave NPA incorporates the same stormwater BMPs, including Site Design BMPs, Source Control BMPs, and Treatment Control BMPs, per Provision C.3, discussed in the 2010 EIR to reduce impacts associated with non-point source pollution.

The Big Wave NPA Project does not include changes that could result in a new significant impact or a substantially more severe impact than that considered in the 2010 EIR. There have not been substantial changes with respect to the circumstances under which the Big Wave NPA project would be undertaken that involve new significant or substantially more severe environmental effects than that identified in the EIR. No new impacts would occur and no new mitigation measures are required.

The CCC and San Mateo County updated the County LCP in 2012 by adopting new LCP policies. New LCP Policy 1.35 requires all new land use development and activities to protect coastal water quality by implementing appropriate site design and source control BMPs. New LCP Appendix 1.A lists minimum stormwater pollution prevention requirements. The Big Wave NPA has incorporated stormwater BMPs, including Site Design BMPs, Source Control BMPs, and Treatment Control BMPs to reduce impacts associated with non-point source pollution. However, LCP Policy 1.35(c) states that where treatment BMPs are required (when projects drain directly to a sensitive habitat), "the BMPs (or suites of BMPs) shall be designed and implemented to remove pollutants from the amount of stormwater runoff produced by all storms up to and including the 85th percentile, 24-hour storm event for volume-based BMPs and/or the 85th percentile, 1-hour storm event (with an appropriate safety factor, i.e., 2 or greater) for flow-based BMPs or the flow of runoff from a rain event equal to at least 0.2 inches per hour intensity to the maximum extent feasible." With the implementation of the proposed erosion sediment control plan, drainage and stormwater control plan, and Mitigation Measures HYDRO-3 through HYDRO-5, the project would comply with LCP Policy 1.35 (Attachment D).

9.b. Significantly deplete groundwater supplies or interfere significantly with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

Under Impact HYDRO-2 (DEIR p. IV.H-48-51), the 2010 EIR evaluated the project's potential to impact groundwater resources based on either increasing groundwater demand or increasing the amount of impervious surface that would interfere with the ability for surface water to infiltrate soils and recharge groundwater aquifers. The 2010 EIR found that impacts would be

less than significant as the project groundwater demands were estimated to be less than the net demands from the existing site; the project's groundwater usage would not discernibly affect the groundwater supply in the regional aquifer and existing groundwater users who draw from it; and groundwater availability during drought is not expected to limit community water-supply availability as projected. The 2010 EIR concluded that the project's impact on groundwater recharge would be less than significant due to the pervious nature of most of the development and any stormwater that does runoff impervious surfaces (rooftops) is planned to be directed to pervious areas. Therefore, no mitigation was required.

The Big Wave NPA project would result in substantially the same type of development, albeit at reduced intensity. The Big Wave NPA reduces and limits the use of groundwater from the on-site well for irrigation only; domestic and fire suppression water service would be provided by MWSD. The domestic water demand is reduced from 26,000 gpd to 9,765 gpd reducing the demand on the groundwater basin. Impervious surfaces are reduced from 3.0 acres to 2.5 acres and pervious surfaces (walkways and parking) from 7.5 acres to 5.4 acres reducing interference with groundwater recharge. As a result, project impacts are reduced from the levels described in the 2010 EIR. There have not been substantial changes with respect to the circumstances under which the Big Wave NPA project would be undertaken that involve new significant or substantially more severe environmental effects than that identified in the EIR. No new mitigation is required.

The 2010 EIR did not evaluate the MWSD's Master Plan as the project is within the Coastside County Water District's Sphere of Influence. Connection to MWSD requires a LAFCo sphere of influence amendment removing the territory from the CCWD sphere, placing it in the MWSD sphere and applying for extension of water service outside MWSD boundaries pursuant to Government Code Section 56133. The estimated project demand for water is 9,765 gpd (Project Description, Table 5). MWSD confirms that it has available sources and water supply to meet the anticipated domestic water demand of 8,800 +/- 20% gpd and fire suppression demand (MWSD 2014a). This 20% margin confirms project water demand can be met up to 10,560 gpd.

9.c. Significantly alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?

The 2010 EIR evaluated the potential for the project's potential to impact drainage patterns based on drainage patterns, soils, and erosion control plans in Impact HYDRO-3 (DEIR p. IV.H-51-53). The potential for erosion impacts is also addressed in Impact GEO-5 (see Response 6.b.). The 2010 EIR concluded that without a complete erosion control plan, a SWPPP, and a landscape plan showing erosion control measures, including measures that adequately control runoff velocities during larger events, the altered drainage patterns imposed by the project could cause significant erosion impacts. Measure HYDRO-3 requires the applicant to prepare and submit landscape plans, erosion control plans, and a SWPPP identifying BMPs to control erosion and sedimentation and provide for treatment of 80 to 85 percent of post-construction runoff from new impervious areas. Neighborhood- and/or lot-level treatment BMPs must be emphasized, consistent with San Francisco Bay RWQCB and SMCWPPP guidance for NPDES Phase 2 compliance. The 2010 EIR concluded implementation of Measure HYDRO-3 reduced the effect of the proposed project on increased erosion to a less-than-significant level.

The Big Wave NPA project is a reduced-scale project with a smaller development footprint. Rough grading of building pads and parking areas have been eliminated reducing the exposure of disturbed soils to erosion from stormwater runoff. Drainage patterns would still be altered by site development. The Big Wave NPA project includes an erosion and sediment control plan (Figure 10) and a stormwater treatment plan (Figure 6) showing measures to minimize sedimentation to wetland areas and other off-site areas and on-site infiltration of development related-runoff, respectively. The proposed Big Wave NPA has been designed to incorporate the County's overall approach and practices for stormwater management. Conformance with LCP and County BMP policies would be determined during final design submittal and building permit

approval. The Big Wave NPA would have less erosion potential from the original proposal; however Measure HYDRO-3 remains applicable and would fully mitigate the project's potential for erosion caused by an altered drainage pattern to a less-than-significant level. The Big Wave NPA project would not result in a new significant or more severe impact than that identified in the 2010 EIR, and there are no new circumstances or information that require the evaluation of new mitigation measures or alternatives.

See Response 9.a. for discussion regarding LCP Policy 1.35.

9.d. Significantly alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

The 2010 EIR evaluated whether placing fill or other structures on-site would block existing drainage paths that could result in increased offsite or on-site flooding in Impact HYDRO-4 (DEIR p. IV.H.53-54). Offsite runoff is unlikely and existing stormwater drainage from upstream travels through a culvert under Airport Street and through the drainage swale. The 2010 EIR looked at the potential for increased flooding from on-site runoff by evaluating the effects on Pillar Point Marsh of increased runoff. The 2010 EIR concluded that there would be an increase in the marsh level by about 0.7 inches over the existing level during a 100-year storm event. The EIR identified Measure HYDRO-4 to reduce the potential for increased flooding to a less-than-significant level. Measure HYDRO-4 requires a drainage report and plans that identify the drainage pathways and the extent of any offsite drainage that flows on-site. It also requires a detailed description of how offsite drainage would be conveyed through the site and requires the drainage plan to be reviewed and approved by the County prior to issuance of grading or building permits.

Big Wave NPA project reduces the development footprint and both impervious and pervious surfaces on the project site. As a result, the project impacts are below the levels analyzed in the 2010 EIR. The proposal includes a drainage Plan (Figure 6) which proposes on-site infiltration of development-related runoff. The Big Wave NPA project does not include changes that could result in a new significant impact or a substantially more severe impact than that considered in the 2010 EIR. No new impacts would occur and no new mitigation measures are required.

9.e. Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff?

The 2010 EIR evaluated the quantity and quality of surface water runoff in Impact HYDRO-5 (DEIR p. IV.H.54-58). Evaluation of the existing and post-project discharge determined that without the implementation of any on-site BMPs, the total watershed peak flows to Pillar Point Marsh would increase by three percent. With planned BMPs, the increase would be smaller. The increase was not considered significant and no mitigation was required. Evaluation of the storm water and drainage patterns determined aquatic and wetland habitats and sensitive species in Pillar Point Marsh could be affected by typical urban runoff contaminants from the project site including petroleum products, hydrocarbons, litter, nutrients, bacteria and landscape maintenance debris. Transport of sediment could also occur during project construction potentially reducing flood storage of the marsh. The EIR identified Measure HYDRO-5 to reduce water quality impacts to a less-than-significant level. Measure HYDRO-5 requires implementation of a comprehensive erosion control plan and SWPPP, as well as an operations and maintenance plan for water quality and quality control measures.

The Big Wave NPA project reduces the impervious and pervious coverage area on the project site from 10.5 to 7.9 acres. The drainage patterns would be similar to those analyzed in the 2010 EIR. Prior to the Final EIR, the Big Wave project eliminated stormwater control design features such as ponds and bioswales which could create vector issues (FEIR Vol I pp. III.A.5, III.A-8). Stormwater controls are shown in Figure 6. Measure HYDRO-5 is amended to remove

references to these design features (Attachment E). Measure HYDRO-5 remains applicable to the Big Wave NPA project and fully addresses storm water drainage capacity and surface water quality impacts. The Big Wave NPA project does not include changes that could result in a new significant impact or a substantially more severe impact than that considered in the 2010 EIR. No new mitigation is required.

See Response 9.a. for discussion regarding LCP Policy 1.35.

9.f. Significantly degrade surface or groundwater quality?

The 2010 EIR determined the Big Wave Wellness Center and Office Park could potentially degrade groundwater quality during construction, during activities conducted by residents and workers following occupancy, and by contamination of unused wells (Impact HYDRO-6; DEIR p. IV.H-58-59). The 2010 EIR determined potential constituent pollutants from construction and development occupancy affecting groundwater are the same as described for surface waters (Impact HYDRO-5) and therefore the regulatory framework and mitigation measures required for surface water quality (Measures HYDRO-3 and HYDRO-5) apply to groundwater quality. The EIR identified Measure HYDRO-6, the abandonment of all unused wells, to prevent entry points of surface contaminants into the groundwater table and further protect groundwater quality. The 2010 EIR concluded these measures reduce the potential impacts to surface and groundwater quality to a less-than-significant level.

The Big Wave NPA reduces the development footprint, the amount of construction activity, and the number of Office Park occupants on the site. The Big Wave NPA project also eliminates the on-site treatment of wastewater and use of recycle water. Although the 2010 EIR concluded that this impact would not violate water quality standards (see Response 9.a., Impact HYDRO-1), eliminating on-site water treatment and recycle water use eliminates a potential source of groundwater quality impact. These project changes reduce the potential sources of contaminants which could affect surface groundwater quality below those levels analyzed in the 2010 EIR. The project would remain subject to the requirements of Provision C.3 of the Municipal Regional Permit, which requires treatment of project stormwater run-off. Measures HYDRO-5 remains sufficient to address groundwater quality impacts of the Big Wave NPA. Measure HYDRO-6 has been amended, as shown in Attachment E, to allow the well to be used for landscaping, gardening, and agricultural uses, without meeting drinking water quality standards. The Big Wave NPA project does not include changes that could result in a new significant impact or a substantially more severe impact than that considered in the 2010 EIR. No new impacts would occur and no new mitigation measures are required.

9.g. Result in increased impervious surfaces and associated increased runoff?

Responses 9.c, 9.d, and 9.e address increased impervious surfaces and associated runoff. The 2010 EIR concluded these impacts were less than significant with the implementation of Measures HYDRO-3, HYDRO-4, and HYDRO-5. The Big Wave NPA reduces the impervious surface footprint from 3.0 to 2.5 acres and pervious surfaces from 7.5 to 5.4 acres resulting in reduced runoff from the levels evaluated in the 2010 EIR. Measures HYDRO-3, HYDRO-4, and HYDRO-5 remain adequate to address project impacts related to increased runoff. The Big Wave NPA project does not include changes that could result in a new significant impact or a substantially more severe impact than that considered in the 2010 EIR. No new impacts would occur and no new mitigation measures are required.

Sources:

Christopher A. Joseph & Associates. 2009. Big Wave Wellness Center and Office Park Draft Environmental Impact Report. SCH No. 2008102109. October 2009.

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- West Yost Associates. 2010. Coastside County Water District: 2010 Urban Water Management Plan. June 2011.

4.10 LAND USE AND PLANNING

<i>Would the project:</i>					
	<i>Where Impact was Analyzed in 2010 EIR</i>	<i>Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?</i>	<i>Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?</i>	<i>Any New Information Requiring New Analysis or Verification?</i>	<i>Do 2010 EIR Mitigation Measures Address/Resolve Impacts?</i>
10.a. Physically divide an established community?	Impact LU-1, DEIR pp. 31-32	No. Proposed changes do not involve physical division of an established community.	No.	No.	The 2010 EIR found Impact LU-1 was less than significant. No mitigation was required. The Big Wave NPA project does not create new significant or more severe impacts. No new mitigation is required.
10.b. Conflict with any applicable land use plan, policy or regulation of an agency with jurisdiction over the project (including, but not limited to, the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	Impact LU-2, DEIR pp. IV.I-32-37, 40-65 FEIR Vol p. III.C-9	No. Proposed changes reduce the development density and number of subdivision lots. Building development is clustered on the north parcel. Undeveloped space is preserved on the south parcel. Setback distances to wetland and riparian zones are increased. A boat storage yard is added. Some Wellness Center services to the Office Park are eliminated.	No.	Yes. The County's Midcoast LCP Update was approved by the CCC in 2012. New and amended LCP policies were approved governing new land development.	The 2010 EIR found Impact LU-1 was less than significant. No mitigation was required. The Big Wave NPA project does not create new significant or more severe impacts. No new mitigation is required. Assessment of the new information (updated LCP policies) does not reveal new project impacts requiring mitigation.
10.c. Conflict with any applicable habitat conservation plan (HCP) or natural community conservation plan (NCCP)?	Impact LU-3, DEIR pp. IV.I-37-38	No. Proposed changes do not involve impacts to a habitat conservation plan or natural community conservation plan.	No.	No.	HCPs or NCCPs do not apply to the project site.

<i>Would the project:</i>					
	<i>Where Impact was Analyzed in 2010 EIR</i>	<i>Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?</i>	<i>Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?</i>	<i>Any New Information Requiring New Analysis or Verification?</i>	<i>Do 2010 EIR Mitigation Measures Address/Resolve Impacts?</i>
10.d. Result in the congregating of more than 50 people on a regular basis?	Not included in DEIR thresholds of significance	No. Proposed changes decrease the Office Park business space and the associated number of employees congregated on-site.	No.	No.	This threshold of significance was not analyzed in the 2010 EIR. The Big Wave NPA project does not create new significant or more severe impacts. No new mitigation is required.
10.e. Result in the introduction of activities not currently found within the community?	Not included in DEIR thresholds of significance	No. Project changes do not introduce new activities not currently found in the community beyond the DD housing previously identified in the certified 2010 EIR.	No.	No.	This threshold of significance was not analyzed in the 2010 EIR.
10.f. Serve to encourage off-site development of presently undeveloped areas or increase development intensity of already developed areas (examples include the introduction of new or expanded public utilities, new industry, commercial facilities or recreation activities)?	Impact POP-1, DEIR pp. IV.K-10-14	No. Proposed changes decrease the Office Park business space resulting in fewer employees and construction workers creating demand for services.	No.	No.	The 2010 EIR found Impact POP-1 to be less than significant. No mitigation was required. The Big Wave NPA project does not create new significant or more severe impacts. No new mitigation is required.
10.g. Create a significant new demand for housing?	Impact POP-1, DEIR pp. IV.K-10-14	No. Proposed changes decrease the Office Park business space resulting in fewer employees and construction workers creating demand for housing.	No.	No.	The 2010 EIR found Impact POP-1 to be less than significant. No mitigation was required. The Big Wave NPA project does not create new significant or more severe impacts. No new mitigation is required.

Environmental and Regulatory Setting:

The Land Use & Planning environmental and regulatory setting is presented in DEIR pp. IV.I-1 to IV.I-28. No changes in existing land uses on the site or surrounding the site have occurred since certification of the 2010 EIR. Changes to local agency land use policies have occurred since certification of the 2010 EIR. The County's Midcoast LCP Update was approved by the CCC in 2012. New and amended LCP policies were approved governing new land development. These changes are addressed below and in Attachment D. Additionally, the Half Moon Bay Airport Land Use Compatibility Plan has been drafted but not finalized (see Responses 8.e. and 12.e. for discussion) and the Princeton Plan is early in the drafting process.

Discussion:

Would the proposed project:

10.a. Physically divide an established community?

The 2010 EIR concluded the Big Wave project would not physically divide an established community (Impact LU-1; DEIR p. IV.I-31-32). The project parcels are immediately adjacent to existing development at the northern end of Princeton and immediately east of the Pillar Ridge mobile home park and located south of Airport Street at the base of Pillar Point Ridge. Access to the project site would be via existing roadways. The 2010 EIR found that these uses would not be displaced or altered and, therefore, the project had a less-than-significant impact regarding the potential physical division of an established community. No mitigation measures were required.

The Big Wave NPA Project does not include changes that could result in a new significant impact or a substantially more severe impact than that considered in the 2010 EIR, as the Big Wave NPA includes changes to cluster residential uses with existing residential uses at the Pillar Ridge mobile home park. The boat storage use on the south parcel is clustered with industrial and marine related uses in the Princeton area to the south of the site. There have not been substantial changes with respect to the circumstances under which the Big Wave NPA project would be undertaken that involve new significant or substantially more severe environmental effects than that identified in the EIR. No new impacts would occur and no new mitigation measures are required.

10.b. Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

The 2010 EIR concluded the Big Wave project would not conflict with applicable land use plans, policies, or regulations of agencies with jurisdiction over the project site (Impact LU-2: DEIR pp. IV.I-32-37 and IV.I-40-65). The DEIR considered the Green Building Standards of the California Building Standards Commission; Bay Area Clean Air Plan; San Francisco Bay Water Quality Control Plan (Basin Plan); the City/County Association of Governments of San Mateo County (C/CAG) Congestion Management Plan; County of San Mateo General Plan, Zoning Regulations, LCP, Community Design Manual, Green Building Ordinance, and Montara-Moss Beach-EI Granada Community Plan; Half Moon Bay Airport Land Use Plan; and San Mateo Local Agency Formation Commission. The 2010 EIR found the project was generally consistent with applicable land use plans, policies, and regulations and concluded the impact was less than significant. No mitigation was required.

The Big Wave NPA project would decrease the developed footprint on the north and south parcels by relocating Wellness Center buildings formerly proposed on the south parcel to the north parcel and reducing the total number of Office Park buildings on the north parcel. Some of the uses previously proposed with the Wellness Center, such as dog grooming services, commercial laundry facilities, have been eliminated since certification of the EIR. No new uses of the Office Park and Wellness Center are proposed and, therefore, the project proposal

remains consistent with General Industrial land use designation and the permitted uses of the M-1 Light Industrial Zoning District on the north parcel as previously determined (County BOS Staff report).

The Big Wave NPA project does not include changes that could result in a new significant impact or a substantially more severe impact than that considered in the 2010 EIR. While the Big Wave NPA project introduces a boat storage use on the south parcel, the use is consistent with the Waterfront Zoning District on the south parcel. The Waterfront District allows commercial allows assembly, repair, storage, and sale of marine vessels as a permitted use in the Marine Related Trades and Services Module (Zoning Regulations Section 6287). The boat storage yard would occur within the development footprint of the previous project proposal. No new impacts would occur and no new mitigation measures are required.

In August 2012, the CCC approved the Midcoast LCP Update which amends San Mateo County LCP policies for the purpose of enhancing protection of coastal resources in the County's Midcoast area. Big Wave NPA project compliance with relevant LCP policies is discussed in Attachment D. The County determined that the Big Wave NPA project complies with LCP policies.

10.c. Conflict with any applicable habitat conservation plan or natural community conservation plan?

As described in Impact LU-3 of the 2010 EIR (DEIR pp. IV.I-37-38), there are no adopted habitat conservation plans or natural community conservation plans that include the Big Wave parcels. The environmental and regulatory setting of the Big Wave NPA project is generally the same as described in the 2010 EIR. The Big Wave NPA project would not conflict with adopted habitat conservation plans. No new impacts would occur and no new mitigation measures are required.

10.d. Result in the congregating of more than 50 people on a regular basis?

This significance threshold was adopted by San Mateo County in 2013 subsequent to certification of the 2010 EIR and is considered below.

The Big Wave NPA project would provide parking for local events including the Mavericks Invitational surf contest and the Pacific Coast Dream Machines Show, but it would not host events that would result in the congregation of 50 or more people. The project buildings would be occupied by workers and the residential care facility would house DD adults, which would result in more than 50 people being on site during a work day. The Big Wave NPA reduces the number of workers at the Office Park commensurate with the reduction in Office Park space from 229,000 square feet to 189,000 sq. feet. By decreasing the project scale, congregating impacts of Wellness Center residents and Office Park employees, such as noise, traffic, and parking, have been reduced to a level below those analyzed in the 2010 EIR. The Big Wave NPA project would not result in a new significant or more severe impact than that identified in the 2010 EIR, and there are no new circumstances or information that require the evaluation of new mitigation measures or alternatives.

10.e. Result in the introduction of activities not currently found within the community?

This significance threshold was adopted by San Mateo County in 2013 subsequent to certification of the 2010 EIR and is considered below.

The Big Wave NPA building area of the north parcel and the areas west of the Pillar Ridge Manufactured Home Community are zoned for Light Industrial use. The south parcel and developed areas to the east are zoned for Waterfront uses, primarily marine-related uses. The Half Moon Bay Airport is located to the north of the project. Approximately 0.5 miles to the east is zoned as a Coastside Commercial Recreational District. Lands to the west are currently occupied by Pillar Ridge Manufactured Home Community.

Communal housing and work opportunities that would be provided for DD adults at the Wellness Center of the Big Wave NPA project would be a new type of land use in coastal San Mateo County. The residential care facility would help meet the current demand for housing and work opportunities for DD adults and would not conflict with existing uses in the area or with the proposed Office Park uses. The Big Wave NPA project continues an existing land use pattern in the area, whereby industrial uses are located within close proximity to residential uses. The Big Wave NPA project would not result in a new significant or more severe impact than that identified in the 2010 EIR, and there are no new circumstances or information that require the evaluation of new mitigation measures or alternatives.

10.f. Serve to encourage off-site development of presently undeveloped areas or increase development intensity of already developed areas (examples include the introduction of new or expanded public utilities, new industry, commercial facilities or recreation activities)?

The 2010 EIR addressed the potential for the project to induce growth in the area in Impact POP-1 (DEIR pp. IV.K-10-13). The 2010 EIR considered population growth due to project construction and occupancy. An estimated 858 people could contribute to population growth of the area. Based on unemployment and vacancy rates, the majority of jobs and housing created by the project was expected to be filled by the existing population of the area. The 2010 EIR concluded the impact was less than significant and no mitigation measures were required.

The Big Wave NPA project does not include changes that could result in a new significant impact or a substantially more severe impact than that considered in the 2010 EIR. Due to the reduction in the project footprint, the number of buildings to be constructed, and the term of project phasing, project construction is likely to require fewer construction workers over a shorter period of time.

The environmental and regulatory setting of the Big Wave NPA project is generally the same as described in the 2010 EIR. The Princeton Planning update project, which has not yet been completed or adopted, is carefully reviewing existing General Plan and zoning designations and development intensities to ensure that future development is consistent with the Coastal Act requirements and the community desire to protect and enhance the Princeton Area. The Big Wave NPA project is smaller and less dense than the 2010 Big Wave project and would therefore be less likely to encourage new development or increase the development intensity of already developed areas. The extension of municipal water and wastewater utilities to the project site would not expand utility service capacity and would not promote new growth to the project area. The Big Wave NPA project would not result in a new significant or more severe impact than that identified in the 2010 EIR, and there are no new circumstances or information that require the evaluation of new mitigation measures or alternatives.

10.g. Create a significant new demand for housing?

The 2010 EIR addressed the potential for the project to create new demand for housing in Impact POP-1 (DEIR pp. IV.K-10-13). The EIR concluded that the majority of jobs created by the project would be filled by the existing population. Therefore the demand for new housing or the growth in area population would be less than significant. No mitigation was required.

The Big Wave NPA Project does not include changes that could result in a new significant impact or a substantially more severe impact than that considered in the 2010 EIR. Due to the reduction in the size of the Office Park, from 225,000 sq. ft. to 189,000 sq. ft., housing demand from Office Park employees is likely to be reduced. Communal housing for developmentally disabled adults at the Wellness Center would continue to provide housing for 50 DD adults and 20 aides. No new impacts would occur and no new mitigation measures are required.

Sources:

Christopher A. Joseph & Associates. 2009. Big Wave Wellness Center and Office Park Draft Environmental Impact Report. SCH No. 2008102109. October 2009.

- Christopher A. Joseph & Associates. 2010. Big Wave Wellness Center and Office Park Final Environmental Impact Report. SCH No. 2008102109. October 2010.
- Coffman Associates. 2013. Airport Land Use Compatibility Plan for the Environs of Half Moon Bay Airport in San Mateo County, California. Prepared for City/County Association of Governments of San Mateo County (C/CAG) Board of Directors in its Designated Role as the Airport Land Use Commission. Draft Final. August 2013.
- County of San Mateo. 2013. Local Coastal Program Policies. June 2013.
- County of San Mateo. 2012. Zoning Regulations. Planning and Building Department. December 2012.
- County of San Mateo. 2011. Inter-Departmental Correspondence. Planning and Building Department to Board of Supervisors. Consideration of: (1) the certification of an Environmental Impact Report (EIR) consisting of a Draft EIR (DEIR) and a Final EIR (FEIR), (2) a Use Permit, (3) a Major Subdivision, (4) a Coastal Development Permit, (5) a Design Review Permit, (6) a Grading Permit, and (7) adoption of an Ordinance approving the execution of a Development Agreement with the County of San Mateo, for the Big Wave Wellness Center and Office Park proposed on two undeveloped parcels (APN 047-311-060 and APN 047-312-040) located in the unincorporated Princeton-by-the-Sea area of San Mateo County. March 1, 2011. Board Meeting Date March 15, 2011.
- County of San Mateo. 2014. Zoning Maps. Planning and Building Department. Public Site. (<http://maps.smcgov.org/planning/>).
- MacLeod and Associates. 2014. Civil Engineering Drawings. Sheet C-1 Vesting Tentative Map for Commercial and Residential Purposes "Big Wave". Sheet C2 Grading and Drainage Plan with Permanent Storm Water Controls. Sheet C-3 Utility Plan. Sheet C4 Sediment and Erosion Control Plan. Sheet C5 Detail Sheet. June 30, 2014.

4.11 MINERAL RESOURCES

<i>Would the project:</i>					
	<i>Where Impact was Analyzed in 2010 EIR</i>	<i>Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?</i>	<i>Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?</i>	<i>Any New Information Requiring New Analysis or Verification?</i>	<i>Do 2010 EIR Mitigation Measures Address/Resolve Impacts?</i>
11.a. Result in the loss of availability of a known mineral resource that would be of value to the region or the residents of the State?	DEIR p. V-6	No. Proposed changes do not involve mineral resource impacts.	No.	No.	The 2010 EIR found no impact to mineral resources. No mitigation required. The Big Wave NPA project does not create new significant or more severe impacts. No new mitigation is required.
11.b. Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	DEIR p. V-6	No. Proposed changes do not involve mineral resource impacts.	No.	No.	The 2010 EIR found no impact to mineral resources. No mitigation required. The Big Wave NPA project does not create new significant or more severe impacts. No new mitigation is required.

Environmental and Regulatory Setting:

The Mineral Resources environmental setting is identified in DEIR p. V-6. No mineral resources occur on or near the project site. As a result, further discussion of regulatory requirements or impact analysis is not provided in the 2010 EIR. No changes to the environmental setting have occurred since certification of the EIR.

Discussion:

Would the proposed project:

11.a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

The 2010 EIR determined there are no known mineral resources within or near the project site based on review of the County General Plan (DEIR p. V-6). The 2010 EIR concluded the project would have no impacts and no further discussion was required. The Big Wave NPA project does not propose to remove any mineral resources for commercial purposes. The Big Wave NPA project would not result in a new significant or more severe impact than that identified in the 2010 EIR, and there are no new circumstances or information that require the evaluation of new mitigation measures or alternatives.

11.b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

The 2010 EIR determined there are no known mineral resources within or near the project site based on review of the County General Plan (DEIR p. V-6). The 2010 EIR concluded the project would have no impacts and no further discussion was required. The Big Wave NPA project does not propose to remove any mineral resources for commercial purposes. The Big Wave NPA project would not result in a new significant or more severe impact than that identified in the 2010 EIR, and there are no new circumstances or information that require the evaluation of new mitigation measures or alternatives.

Sources:

Christopher A. Joseph & Associates. 2009. Big Wave Wellness Center and Office Park Draft Environmental Impact Report. SCH No. 2008102109. October 2009.

County of San Mateo. 1986.General Plan. Approved by Board of Supervisors November 18, 1986.

4.12 NOISE

<i>Would the project result in:</i>					
	<i>Where Impact was Analyzed in 2010 EIR</i>	<i>Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?</i>	<i>Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?</i>	<i>Any New Information Requiring New Analysis or Verification?</i>	<i>Do 2010 EIR Mitigation Measures Address/Resolve Impacts?</i>
12.a. Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	Impact NOISE-1, DEIR pp. IV.J-15-19 FEIR pp. III.B-23-24	No. Proposed changes reduce the number of buildings constructed and eliminate site grading for building pad and parking areas requiring less construction equipment activity. Import of gravel fill adds new haul truck traffic. Reduced Office Park space reduces employee and delivery vehicle traffic.	No.	No.	The 2010 EIR found Impact NOISE-1 to be potentially significant. Measure NOISE-1 reduces the impact to less than significance. This measure fully addresses impacts associated with project changes. No new mitigation is required.
12.b. Exposure of persons to or generation of excessive ground-borne vibration or ground-borne noise levels?	Impact NOISE-2, DEIR pp. IV.J-19-21	No. Proposed changes reduce the number of buildings constructed and eliminate site grading for building pad and parking areas requiring less construction equipment activity.	No.	No.	The 2010 EIR found Impact NOISE-2 to be potentially significant. Measure NOISE-1 reduces the impact to less than significance. This measure fully addresses impacts associated with project changes. No new mitigation is required.
12.c. A significant permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	Impact NOISE-3, DEIR pp. IV.J-21-24 Impact NOISE-4, DEIR pp. IV.J-22-24	No. Proposed changes reduce the number of buildings and parking spaces resulting in less and Office Park activity and traffic noise.	No.	No.	The 2010 EIR found Impacts NOISE-3 and NOISE-4 to be less than significant. No mitigation was required. The Big Wave NPA project does not create new significant or more severe impacts. No new mitigation is required.

<i>Would the project result in:</i>					
	<i>Where Impact was Analyzed in 2010 EIR</i>	<i>Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?</i>	<i>Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?</i>	<i>Any New Information Requiring New Analysis or Verification?</i>	<i>Do 2010 EIR Mitigation Measures Address/Resolve Impacts?</i>
12.d. A significant temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	Impact NOISE-1, DEIR pp. IV.J-15-19 FEIR pp. III.B-23-24	No. Proposed changes reduce the number of buildings resulting in less construction activity.	No.	No.	The 2010 EIR found Impact NOISE-1 to be potentially significant. Measure NOISE-1 reduces the impact to less than significance. This measure fully addresses impacts associated with project changes. No new mitigation is required.
12.e. For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, exposure to people residing or working in the project area to excessive noise levels?	Impact NOISE-3, DEIR p. IV.J-21 Topical Response 14: Location of Project Near Half Moon Bay Airport, FEIR pp. II-74-80	No. Proposed changes do not alter exposure to noise from Half Moon Bay Airport.	No.	Yes. A Draft Final Airport Land Use Compatibility Plan (ALCUP) for the Half Moon Bay Airport was prepared in August 2013.	The 2010 EIR found Impact NOISE-3 to be less than significant. No mitigation was required. The Big Wave NPA project does not create new significant or more severe impacts. No new mitigation is required. The ALCUP has not yet been adopted. As currently drafted, its policies do not apply to the Big Wave NPA project.
12.f. For a project within the vicinity of a private airstrip, exposure to people residing or working in the project area to excessive noise levels?	DEIR p. V-6	No. Proposed changes are not located in vicinity of a private airstrip.	No.	No.	The 2010 EIR found the project is not in vicinity of a private airstrip. There is no impact. No mitigation was required. The Big Wave NPA project does not create new significant or more severe impacts. No new mitigation is required.

Environmental and Regulatory Setting:

The Noise environmental and regulatory setting is presented in DEIR pp. IV.J-4 to IV.J-12. No changes in environmental setting have occurred since certification of the 2010 EIR.

Discussion:

Would the proposed project:

12.a. Expose persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

The 2010 EIR concluded project construction noise could expose the residents of the Pillar Ridge Manufactured Home Community and the residents of the Wellness Center to periodic noise levels in excess of county noise standards (Impact NOISE-1; DEIR pp. IV.J-15-19). Measure NOISE-1 was identified to reduce this effect to a less-than-significant level. Measure NOISE-1 includes equipment muffling, turning off unused equipment, locating vehicle storage and start-up areas away from residential area, use of temporary sound barriers, notification of residents, and posting of construction hours.

The Big Wave NPA project changes reduce the scale of development by eliminating three Office Park buildings and site grading needed for building pad and parking lot construction. As a result project noise emissions associated with site development and uses is reduced from the levels described in the 2010 EIR. The proposed project noise impacts are adequately covered by the 2010 EIR. Measure NOISE-1 fully addresses Big Wave NPA impacts. The Big Wave NPA project does not include changes that could result in a new significant impact or a substantially more severe impact than that considered in the 2010 EIR. There are no new circumstances or information that require the evaluation of new mitigation measures or alternatives.

12.b. Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

The 2010 EIR addressed groundborne vibration impacts in Impact NOISE-2 (DEIR pp. IV.J-19-21). The primary sources of ground-borne vibration associated with the proposed project would be construction activities at the project site such as pile driving which could exceed the 72 VdB threshold at nearby residences within the Pillar Ridge Manufactured Home Community and the Wellness Center residential buildings. The 2010 EIR concluded the impact was potentially significant. Measure NOISE-1 was required to reduce the ground-borne vibration impacts to a less-than-significant level by prohibiting impact pile drivers and requiring use of drilled piers or sonic or vibratory pile drivers.

The Big Wave NPA project reduces the amount of required equipment operation during project construction. Rough grading for building pads and parking areas is eliminated reducing heavy equipment use. Three Office Park buildings are eliminated reducing the use of pile drivers. As a result, the groundborne vibration levels from the Big Wave NPA project would be below the noise levels analyzed in the 2010 EIR. Measure NOISE-1 remains applicable and fully addresses Big Wave NPA groundborne vibration impacts. The Big Wave NPA project does not involve changes that could result in a new significant impact or a substantially more severe impact than that considered in the 2010 EIR. There are no new circumstances or information that require the evaluation of new mitigation measures or alternatives.

12.c. A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?

The 2010 EIR addressed permanent noise sources associated with the project (Impact NOISE-3 and NOISE-4; DEIR p IV.J-21-24). Noise sources include vehicles in parking lot, associated vehicle traffic on roadways, and mechanical equipment on building roof tops such as heating, ventilation, and air conditioning (HVAC) units, and the on-site wastewater treatment plant. The 2010 EIR concluded these impacts were less than significant. No mitigation was required.

The Big Wave NPA project reduces noise sources from developed uses on the project site by reducing parking spaces from 690 to 554, eliminating three office buildings, and eliminating the wastewater treatment plant. As a result, the noise levels from the Big Wave NPA project would

be below the noise levels analyzed in the 2010 EIR. The Big Wave NPA project does not include changes that could result in a new significant impact or a substantially more severe impact than that considered in the 2010 EIR. There are no new circumstances or information that require the evaluation of new mitigation measures or alternatives.

12.d. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

The 2100 EIR addressed temporary and period noise impacts in NOISE-1 (DEIR pp. IV.J-15-19). As discussed in the 2010 EIR, project construction noise could expose the residents of the Pillar Ridge Manufactured Home Community to periodic noise levels in excess of county noise standards. See discussion under Response 12.a. The 2010 EIR identified Measure NOISE-1 to reduce this effect to a less-than-significant level. This measure includes equipment muffling, turning off unused equipment, locating vehicle storage and start-up areas away from residential area, use of temporary sound barriers, notification of residents, and posting of construction hours.

The Big Wave NPA project reduces the scale of development resulting in less construction activity and noise levels than analyzed in the 2010 EIR. Measure NOISE-1 continues to fully address temporary or periodic noise impacts associated with the project. The Big Wave NPA project does not include changes that could result in a new significant impact or a substantially more severe impact than that considered in the 2010 EIR. There are no new circumstances or information that require the evaluation of new mitigation measures or alternatives.

12.e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

The 2010 EIR evaluated airport noise exposure impacts in Impact NOISE-3 (DEIR p. IV.J-21). The existing roadway and airport noise level along Airport Street near the project site is 61.8 dBA CNEL (DEIR Table IV.I-4). This level is acceptable for multi-family homes and office buildings (DEIR Table IV.I-5). The EIR concluded that the impact was less than significant and no mitigation was required.

The Big Wave NPA Project does not include changes that could result in a new significant impact or a substantially more severe impact than that considered in the 2010 EIR. Residential areas of the Wellness Center are located further south on the project site, providing an increased distance of 150 feet from the Half Moon Bay Airport than the original project. The Big Wave NPA project would not result in a new significant or more severe impact than that identified in the 2010 EIR, and there are no new circumstances or information that require the evaluation of new mitigation measures or alternatives.

The environmental and regulatory setting of the Big Wave NPA project is generally the same as described in the 2010 EIR. A new Draft Final ALUCP for the Half Moon Bay Airport was prepared since the 2010 EIR, although the plan has not yet been adopted. As currently drafted, the Draft Final ALUCP applies the 1996 ALUCP to projects with completed applications undergoing planning review.

Should the revised ALUCP, once adopted, apply to applications deemed complete prior to its adoption, the project would be subject to revised aircraft noise contours, safety zones, and a height restrictions. A large portion of the project site is located within Safety Zone 2, Inner Approach/ Departure Zone (IADZ). The IADZ extends 4,000 feet from the end of the runway (Runway 12/300 and is 1,500 feet wide (750 feet on either side of the runway centerline). The accident risk level is considered high in this zone. Prohibited uses in this zone include residential, except for very low density residential and infill in developed areas, and office buildings greater than 3 stories. Other development conditions include the following: airport disclosure notice required, locate all structures maximum distance from runway centerline and

airspace review for object/structures greater than 35 feet tall. The maximum non-residential intensity is 60 persons per acre.

A very small portion of the project site adjacent to its northern boundary is located within Safety Zone 5 – Sideline Safety Zone (SSZ). The width of the SSZ is 530 feet. The edge of the SSZ on the west side of the runway is 220 feet from the runway centerline. The accident level in the SSZ is considered low to moderate. Prohibited uses in this zone are the same as in the IADZ. The other development conditions are the same as those in the IADZ. The maximum non-residential intensity is 100 persons per acre.

While the exact locations of the buildings relative to these zones would need to be mapped exactly, the bulk of the residential buildings of the Wellness Center appear to be outside of the IADZ and the SSZ. Should residences be located in these zones, the applicant intends to revise the subdivision map to comply with the density limits of the specific zone. Project changes necessary to meet the requirements of the revised ALUCP may involve minor change to the location of buildings as well as changes to the location of lot lines, but would not result in significant changes to the size of buildings, parking lot, wetland areas or wetland buffers. Minor modifications are not likely to increase project impacts over the levels discussed in this document. As stated previously, the project is considered infill development, as the site is surrounded by airport, industrial, and residential structures and land uses. The project involves structures over 35-feet in height that would be subject to airspace review. The project does not include any office buildings over 3-stories in height.

Existing noise contours for 2012 and long range noise contours for the year 2032 as shown in the 2013 Draft Final ALUCP (Exhibits 2F and 2G) show that the portion of the project site proposed for Office Park and Wellness Center development would be exposed to 65 Community Noise Equivalent Level (CNEL). This level is higher than the 60 dBA CNEL previously identified in the DEIR as the project site noise level associated with operations at the airport based on the 1981 Comprehensive Airport Plan and Noise Element of the County General Plan (DEIR, p. IV.J-6). This noise exposure falls within the normally acceptable level of 50-65 dBA for multi-family residential dwellings and 50-70 dBA for office buildings (DEIR, p. IV.J-10, Table IV.J-5). The updated noise contours identified in the 2013 Draft Final ALUCP do not change the conclusions of the environmental impact analysis contained in the 2010 EIR. The noise exposure impact remains less than significant and no mitigation is required to reduce the exposure of project site residents and workers to airport noise.

12.f. For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

The 2010 EIR determined the project site is not located within the vicinity of a private airstrip (DEIR p. V-6). The project would have no impact to exposing people residing or working in the project area to excessive noise levels and no further discussion was required. The Big Wave NPA project would not result in a new significant or more severe impact than that identified in the 2010 EIR, and there are no new circumstances or information that require the evaluation of new mitigation measures or alternatives.

Sources:

Christopher A. Joseph & Associates. 2009. Big Wave Wellness Center and Office Park Draft Environmental Impact Report. SCH No. 2008102109. October 2009.

City/County Association of Governments of San Mateo County. 2013. Letter to David Byers, Esq. Byers/Richardson Lawyers from Sandy Wong, Executive Director. RE: Request for Land Use Compatibility Information Related to the Big Wave North Parcel Alternative (NPA) Project. July 2, 2013.

Coffman Associates. 2013. Airport Land Use Compatibility Plan for the Environs of Half Moon Bay Airport in San Mateo County, California. Prepared for City/County Association of Governments of San Mateo County (C/CAG) Board of Directors in its Designated Role as the Airport Land Use Commission. 2G Draft Final. August 2013.

4.13 POPULATION AND HOUSING

<i>Would the project:</i>					
	<i>Where Impact was Analyzed in 2010 EIR</i>	<i>Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?</i>	<i>Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?</i>	<i>Any New Information Requiring New Analysis or Verification?</i>	<i>Do 2010 EIR Mitigation Measures Address/Resolve Impacts?</i>
13.a. Induce significant population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	Impact POP-1, DEIR pp. IV.K-10-13	No. Proposed changes decrease the Office Park business space resulting in fewer employees and construction workers creating demand for housing.	No.	No.	The 2010 EIR found Impact POP-1 to be less than significant. No mitigation was required. The Big Wave NPA project does not create new significant or more severe impacts. No new mitigation is required.
13.b. Displace existing housing (including low- or moderate-income housing), in an area that is substantially deficient in housing, necessitating the construction of replacement housing elsewhere?	DEIR p. V-7	No. Project changes do not involve displacing housing.	No.	No.	The 2010 EIR found no impact to existing housing. No mitigation was required. The Big Wave NPA project does not create new significant or more severe impacts. No new mitigation is required.

Environmental and Regulatory Setting:

The Population and Housing environmental and regulatory setting is presented in DEIR pp. IV.K-2 to IV.K-9. No substantial changes in the setting such as new growth in jobs or housing opportunities in the project area have occurred since certification of the 2010 EIR.

Discussion:

Would the proposed project:

13.a. Induce significant population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

The 2010 EIR addressed the potential for the project to induce population growth due to project construction, new jobs associated with Office Park and Wellness Center employment, and the new Wellness Center housing (DEIR pp. IV.K-10 to V.K-13; Impact POP-1). The 2010 EIR concluded the impact was less than significant. No mitigation was required.

The Big Wave NPA would reduce the amount of Office Park space and the amount of project construction resulting in fewer workers employed at the project site. Thus the population growth impacts would be lower than the level analyzed in the 2010 EIR. The Big Wave NPA project would not result in a new significant or more severe impact than that identified in the 2010 EIR,

and there are no new circumstances or information that require the evaluation of new mitigation measures or alternatives.

13.b. Displace existing housing (including low- or moderate-income housing), in an area that is substantially deficient in housing, necessitating the construction of replacement housing elsewhere?

The 2010 EIR determined the project would not displace existing housing, necessitating the construction of replacement housing elsewhere (DEIR p. V-7). The portions of the project site to be developed are currently used as agricultural farmland and do not contain any residents or housing units; therefore, the project would not displace existing housing. The 2010 EIR concluded the impact was less than significant and no further discussion was required.

The Big Wave NPA project would not result in a new significant or more severe impact than that identified in the 2010 EIR, and there are no new circumstances or information that require the evaluation of new mitigation measures or alternatives.

Sources:

Christopher A. Joseph & Associates. 2009. Big Wave Wellness Center and Office Park Draft Environmental Impact Report. SCH No. 2008102109. October 2009.

Christopher A. Joseph & Associates. 2010. Big Wave Wellness Center and Office Park Final Environmental Impact Report. SCH No. 2008102109. October 2010.

4.14 PUBLIC SERVICES

Would the project result in significant adverse physical impacts associated with the provision of new or physically altered government facilities, the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

	<i>Where Impact was Analyzed in 2010 EIR</i>	<i>Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?</i>	<i>Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?</i>	<i>Any New Information Requiring New Analysis or Verification?</i>	<i>Do 2010 EIR Mitigation Measures Address/Resolve Impacts?</i>
14.a. Fire protection?	Impact PS-2, DEIR pp. IV.L-20-23	No. Proposed changes reduce number of Office Park buildings requiring fire protection services.	No.	No.	The 2010 EIR found Impact PS-2 to be less than significant. Measure PS-2a was identified to further reduce impacts. The Big Wave NPA project does not create new significant or more severe impacts. No new mitigation is required.
14.b. Police protection?	Impact PS-1, DEIR pp. IV.L-8-10	No. Proposed changes reduce number of Office Park buildings and number of employees requiring police protection services.	No.	No.	The 2010 EIR found Impact PS-1 to be less than significant. Measure PS-1 was identified to further reduce impacts. The Big Wave NPA project does not create new significant or more severe impacts. No new mitigation is required.
14.c. Schools?	Impact PS-3, DEIR pp. IV.L-28-30	No. Proposed changes do not affect the number of live-in staff members at the Wellness Center. The number of school-aged children of staff members would remain unchanged.	No	No.	The 2010 EIR found Impact PS-3 to be less than significant. No mitigation was required. The Big Wave NPA project does not create new significant or more severe impacts. No new mitigation is required.

Would the project result in significant adverse physical impacts associated with the provision of new or physically altered government facilities, the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:					
	<i>Where Impact was Analyzed in 2010 EIR</i>	<i>Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?</i>	<i>Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?</i>	<i>Any New Information Requiring New Analysis or Verification?</i>	<i>Do 2010 EIR Mitigation Measures Address/Resolve Impacts?</i>
14.d. Parks?	Impact PS-4, DEIR pp. IV.L-44-47	No. Proposed changes reduce the number of Office Park employees who may utilize park facilities.	No.	No.	The 2010 EIR found Impact PS-4 to be less than significant. No mitigation was required. The Big Wave NPA project does not create new significant or more severe impacts. No new mitigation is required.
14.e. Other public facilities or utilities (e.g., hospitals, or electrical/natural gas supply systems)?	Impact PS-5, DEIR p. IV.L-54	No. Proposed changes reduce the number of Office Park employees who may utilize library services.	No.	No.	The 2010 EIR found Impact PS-5 to be less than significant. No mitigation was required. The Big Wave NPA project does not create new significant or more severe impacts. No new mitigation is required.

Environmental and Regulatory Setting:

The Public Services environmental and regulatory setting is discussed in DEIR pp. IV.L-1 to IV.L-7; IV.L-13 to 20; IV.L-25 to 28; IV.L-31 to 43; and IV.L-49 to 53. No substantial changes in the setting such as decreased availability of services have occurred since certification of the 2010 EIR.

Discussion:

Would the proposed project:

- 14. Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:**

14.a. Fire protection?

The 2010 EIR addressed project impacts to fire protection in Impact PS-2 (DEIR pp. IV.L-20-30). The EIR concluded that project construction activity has the potential to adversely affect fire protection, such as reduced emergency vehicle response times, by adding construction traffic to

the street network and potentially requiring partial land closures during street improvements and utility line installations. Project construction activity was not expected to increase fire and emergency services to the extent that there would be a need for new, expanded, consolidated, or relocated fire facilities. Therefore, fire protection impacts were determined to be less than significant. Measure PS-2a recommended use of flagmen during grading and construction periods to help facilitate traffic flow when there are partial closures, roadblocks or encroachments onto the streets surrounding the project site. Developed uses on the project site would increase the demand for fire protection services. It was unknown whether existing staffing and equipment levels would be adequate to serve the development. However, given that the building permit process includes a requirement for project review by the fire authority, the impacts to fire protection services were considered less than significant.

The Big Wave NPA project would reduce construction activity by eliminating rough grading for building pads and parking areas. Three Office Park buildings would be eliminated reducing the demand for fire protection services. As a result, project demand for police services is slightly reduced from the levels described in the 2010 EIR. Measure PS-2a identified in the 2010 EIR remains applicable to the Big Wave NPA project to reduce the effects of construction traffic on emergency response vehicles.

As described in detail in Section 2.3.7, the Big Wave NPA project includes on-site improvements, such as a water tank and booster pumps, to provide adequate fire flow to meet the requirements of the Coastside County Fire Protection District. The 100,000 – 200,000 gallon storage tank would be located on the basement level of Wellness Center Building 3 and would not require additional excavation. Booster pumps and engine would also be located within the building footprint. As discussed in detail in Section 17.b, based on a fire flow test conducted in 2012, fire flow in the project vicinity is 527 gallons per minute (gpm) at 20 pounds per square inch (psi). Based on the proposed site improvements and the proposal for all Wellness Center and Office Park buildings to be constructed to Class 1 standards, the Coastside County Fire Protection District estimates that there is adequate fire flow to serve the project.

The Big Wave NPA project would not result in a new significant or more severe impact than that identified in the 2010 EIR, and there are no new circumstances or information that require the evaluation of new mitigation measures or alternatives.

14.b. Police protection?

The 2010 EIR addressed project impacts to police protection in Impact PS-1 (DEIR pp. IV.L-8-11). The EIR concluded given the type of development, the increase in number of persons and activity level on the project site would not result in a meaningful increase in the amount of crime in the area, increase police response times, or create the need for new or altered police facilities. The impact was determined to be less than significant. At the recommendation of the Sheriff's Department, Measure PS-1 was required to provide on-site manned security with clear lines of communication to fire and emergency medical response.

The Big Wave NPA project would reduce Office Park business space and the number of employees. The number of Wellness Center residential units would be reduced; however the number of residents and live-in staff would remain unchanged. As a result, project demand for police services would be slightly reduced from the levels described in the 2010 EIR. Measure PS-1 identified in the 2010 EIR would continue to reduce police protection service impacts. The Big Wave NPA project would not result in a new significant or more severe impact than that identified in the 2010 EIR, and there are no new circumstances or information that require the evaluation of new mitigation measures or alternatives.

14.c. Schools?

The 2010 EIR addressed project impacts to schools in Impact PS-3 (DEIR pp. IV.L-28-29). The EIR determined the project has the potential to generate 13 students – six elementary students, three middle school students, and four high school students. Section 65996 of the Government

Code requires payment of development mitigation fees to schools to offset the impact on school services. With payment of these fees, impacts to schools are considered fully mitigated and the impact is less than significant.

The Big Wave NPA project would not change the number of residential units proposed on the project site. The number of school-aged children generated by the Big Wave NPA project remains unchanged from the levels analyzed in the 2010 EIR. The Big Wave NPA project would not result in a new significant or more severe impact than that identified in the 2010 EIR, and there are no new circumstances or information that require the evaluation of new mitigation measures or alternatives.

14.d. Parks?

The 2010 EIR addressed project impacts to parks in Impact PS-4 (DEIR pp. IV.L-44-47). The EIR determined that existing county park and recreational facilities were not adequate to meet the area's current demand. At certain times local State parks and recreational facilities were at capacity. The project demand for parks from Wellness Center residents and Office Park employees would add to existing county park deficits and strain State park facilities. The project would provide on-site private recreational opportunities including a basketball court, movie theater, multi-purpose room, indoor swimming pool, and fitness center. These facilities along with on-site open space and common areas, and the payment of payment of development mitigation fees to parks (required by the Quimby Act, Section 66477 of the California Government Code) reduce the project impacts to less than significant. No mitigation was required.

The Big Wave NPA project would reduce Office Park business space and the number of employees. The number of Wellness Center residential units would be reduced; however the number of residents and live-in staff would remain unchanged. As a result, project demand for park services would be slightly reduced from the levels described in the 2010 EIR. The Big Wave NPA project would not result in a new significant or more severe impact than that identified in the 2010 EIR, and there are no new circumstances or information that require the evaluation of new mitigation measures or alternatives.

14.e. Other public facilities or utilities (e.g., hospitals, or electrical/natural gas supply systems)?

The 2010 EIR addressed project impacts to library services in Impact PS-5 (DEIR p. IV.L-54). The EIR concluded that the demand for library services would not significantly change with the project development. The impact was considered less than significant and no mitigation was required.

The Big Wave NPA project would reduce Office Park business space and the number of employees. The number of Wellness Center residential units would be reduced; however the number of residents and live-in staff would remain unchanged. As a result, project demand for library services would be slightly reduced from the levels described in the 2010 EIR. The Big Wave NPA project would not result in a new significant or more severe impact than that identified in the 2010 EIR, and there are no new circumstances or information that require the evaluation of new mitigation measures or alternatives.

Sources:

Christopher A. Joseph & Associates. 2009. Big Wave Wellness Center and Office Park Draft Environmental Impact Report. SCH No. 2008102109. October 2009.

Christopher A. Joseph & Associates. 2010. Big Wave Wellness Center and Office Park Final Environmental Impact Report. SCH No. 2008102109. October 2010.

4.15 RECREATION

<i>Would the project:</i>					
	<i>Where Impact was Analyzed in 2010 EIR</i>	<i>Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?</i>	<i>Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?</i>	<i>Any New Information Requiring New Analysis or Verification?</i>	<i>Do 2010 EIR Mitigation Measures Address/Resolve Impacts?</i>
15.a. Increase the use of existing neighborhood or regional parks or other recreational facilities such that significant physical deterioration of the facility would occur or be accelerated?	Impact PS-4, DEIR pp. IV.L-44-47	No. Proposed changes reduce the number of Office Park employees who may utilize recreational facilities.	No.	No.	The 2010 EIR found Impact PS-4 to be less than significant. No mitigation was required. The Big Wave NPA project does not create new significant or more severe impacts. No new mitigation is required.
15.b. Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	Impact PS-4, DEIR pp. IV.L-44-47	No. Proposed changes do not affect proposed recreation facilities (basketball, pool, lockers).	No.	No.	The 2010 EIR found Impact PS-4 to be less than significant. No mitigation was required. The Big Wave NPA project does not create new significant or more severe impacts. No new mitigation is required.

Environmental and Regulatory Setting:

The Recreation environmental and regulatory setting is discussed in DEIR pp. IV.L-31 to 43. No substantial changes in the setting such as increased use or reduced availability of recreational facilities have occurred since certification of the 2010 EIR.

Discussion:

Would the proposed project:

15.a. Increase the use of existing neighborhood or regional parks or other recreational facilities such that significant physical deterioration of the facility would occur or be accelerated?

The 2010 EIR addressed project demand for recreational facilities in Impact PS-4 (DEIR pp. IV.L-44-47). Pursuant to the County's standard minimum parkland to population ratio of six acres of developed parkland (mini, neighborhood, and community parks) for every 1,000 residents as defined in the Mid Coast Recreational Needs Assessment (DEIR, p. IV.L-46-47), the parkland space demand would be reduced from 0.42 acres (18,295 sq. ft) to 0.34 acres (14,898 sq. ft.). The EIR concluded the proposed increase in demand for recreation space was offset by the recreation amenities available to project residents (theater, gym, basketball court, swimming pool) and the coastal trail which is available to the public. The impact was considered less than significant and no mitigation was required.

The Big Wave NPA project would reduce Office Park business space and the number of employees. The number of Wellness Center residents and live-in staff would remain unchanged. As a result, project demand for off-site neighborhood and regional recreational facilities would be slightly reduced from the levels described in the 2010 EIR. The Big Wave NPA project would not result in a new significant or more severe impact than that identified in the 2010 EIR, and there are no new circumstances or information that require the evaluation of new mitigation measures or alternatives.

15.b. Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

The 2010 EIR assessed the recreational facilities included as part of the Big Wave project (DEIR pp. IV.L-44-47) including a theater, basketball court, gym, and swimming pool. Additionally, the project includes development of a coastal trail along the Airport Street frontage (Figure 4). The EIR concluded the environmental impacts of these recreational facilities were less than significant. No mitigation was required.

The Big Wave NPA project would not require the construction or expansion of offsite recreational facilities. The proposed project changes do not involve new recreational facilities not previously analyzed in the EIR. The Big Wave NPA project would not result in a new significant or more severe impact than that identified in the 2010 EIR, and there are no new circumstances or information that require the evaluation of new mitigation measures or alternatives.

Sources:

Christopher A. Joseph & Associates. 2009. Big Wave Wellness Center and Office Park Draft Environmental Impact Report. SCH No. 2008102109. October 2009.

Christopher A. Joseph & Associates. 2010. Big Wave Wellness Center and Office Park Final Environmental Impact Report. SCH No. 2008102109. October 2010.

4.16 TRANSPORTATION/TRAFFIC

<i>Would the project:</i>					
	<i>Where Impact was Analyzed in 2010 EIR</i>	<i>Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?</i>	<i>Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?</i>	<i>Any New Information Requiring New Analysis or Verification?</i>	<i>Do 2010 EIR Mitigation Measures Address/Resolve Impacts?</i>
16.a. Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including, but not limited to, intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	Impact TRANS-1, DEIR p. IV.M-27 Impact TRANS-3, DEIR p. IV.M-37 Impact TRANS-8, DEIR p. IV.M-41 Impact TRANS-9, DEIR pp. IV.M-41-42 Impact TRANS-10, DEIR p. IV.M-43 Impact TRANS-11, DEIR pp. IV.M-43-46 Topical Response 8: Traffic and Parking Impacts, FEIR pp. II-53-57	No. Project changes reduce the number of daily vehicle trips from 2,123 daily trips to 1,479 daily trips. New import of 21,400 yds ³ gravel fill requires roughly 1,000 haul trucks --10 loads a day for one month in Year 2, Year 4, and Year 5 and 10 loads a day for a two-month period in Year 7.	No. 2014 traffic counts show existing conditions have not significantly changed since the 2009 traffic report.	Yes. The County's Midcoast LCP Update was approved by the CCC in 2012. LCP Policy 2.52 was added governing traffic mitigation for new development.	The 2010 EIR found Impacts TRANS-1, TRANS-9, and TRANS-10 to be potentially significant. Measure TRANS-1 as approved by the County Board of Supervisors, was required to reduce the project and cumulative LOS impacts to less than significant. Amendment to Measure TRANS-1 ensures timing of the implementation of traffic improvements matches the timing of project impacts. The amended text also identifies a new improvement design. The modification is improves an existing measure for a known impact and is considered a minor change. The 2010 EIR found Impact TRANS-8 to be less than significant. However, Measure TRANS-8 was required to address construction traffic impacts. This measure fully addresses new haul truck traffic generated by project changes. The 2010 EIR found Impacts TRANS-3 and TRANS-11 to be less than significant. No mitigation was required.

<i>Would the project:</i>					
	<i>Where Impact was Analyzed in 2010 EIR</i>	<i>Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?</i>	<i>Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?</i>	<i>Any New Information Requiring New Analysis or Verification?</i>	<i>Do 2010 EIR Mitigation Measures Address/Resolve Impacts?</i>
					The Big Wave NPA project does not create new significant or more severe impacts. No new mitigation is required.
16.b. Conflict with an applicable congestion management program, including, but not limited to, level of service standards and travel demand measures, or other standards established by the County congestion management agency for designated roads or highways?	Impact TRANS-11, DEIR pp. IV.M-43-46 Topical Response 8: Traffic and Parking Impacts, FEIR pp. II-53-57	No. Project changes reduce the number of daily vehicle trips from 2,123 daily trips to 1,479 daily trips. New import of 21,400 yds ³ gravel fill requires roughly 1,000 haul trucks -- 10 loads a day for one month in Years 2, 4, and Year 5 and for two months in Year 7.	No.	No.	The 2010 EIR found Impact TRANS-11 to be less than significant. No mitigation was required. The Big Wave NPA project does not create new significant or more severe impacts. No new mitigation is required.
16.c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in significant safety risks?	DEIR pp. IV.M-22 and V-7 Topical Response 14: Location of Project Near Half Moon Bay Airport, FEIR pp. II-74-80	No. Project changes do not involve impacts to air traffic patterns or increased safety risks.	No	No.	The 2010 EIR found no impact to air traffic patterns. No mitigation was required. The Big Wave NPA project does not create new significant or more severe impacts. No new mitigation is required.
16.d. Significantly increase hazards to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	Impact TRANS 2, DEIR p. IV.M-37	No. Project changes do not introduce design features which create traffic hazards.	No.	No.	The 2010 EIR concluded emergency access impacts are less-than-significant. No mitigation was required. The Big Wave NPA project does not create new significant or more severe impacts. No new mitigation is required.

<i>Would the project:</i>					
	<i>Where Impact was Analyzed in 2010 EIR</i>	<i>Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?</i>	<i>Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?</i>	<i>Any New Information Requiring New Analysis or Verification?</i>	<i>Do 2010 EIR Mitigation Measures Address/Resolve Impacts?</i>
16.e. Result in inadequate emergency access?	Impact TRANS-4, DEIR p. IV.M-38	No. Project changes do not affect emergency access plans.	No.	No.	The 2010 EIR concluded emergency access impacts are less-than-significant. No mitigation was required. The Big Wave NPA project does not create new significant or more severe impacts. No new mitigation is required.
16.f. Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	Impact TRANS-6, DEIR p. IV.M-40 Impact TRANS-7, DEIR pp. IV.M-40-41	No. Project changes do not affect public transit, bicycle, or pedestrian facilities.	No.	No.	The 2010 EIR found Impacts TRANS-6 and TRANS-7 to be less than significant. No mitigation was required. The Big Wave NPA project does not create new significant or more severe impacts. No new mitigation is required.
16.g. Cause noticeable increase in pedestrian traffic or a change in pedestrian patterns?	Impact TRANS-7, DEIR pp. IV.M-40-41	No. Proposed changes reduce Office Park employees and generate fewer pedestrians from the Office Park. The surrounding pedestrian facilities would remain unchanged.	No.	No.	The 2010 EIR found Impact TRANS-7 to be less than significant. No mitigation was required. The Big Wave NPA project does not create new significant or more severe impacts. No new mitigation is required.

<i>Would the project:</i>					
	Where Impact was Analyzed in 2010 EIR	<u>Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?</u>	<u>Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?</u>	<u>Any New Information Requiring New Analysis or Verification?</u>	<u>Do 2010 EIR Mitigation Measures Address/Resolve Impacts?</u>
16.h. Result in inadequate parking capacity?	Impact TRANS-5, DEIR pp. IV.M-38-40 Topical Response 8: Traffic and Parking Impacts, FEIR pp. II-53-57	No. Proposed changes reduce the demand for parking from 690 to 554.	No.	No.	The 2010 EIR found Impact TRANS-5 to be less than significant. No mitigation was required. The Big Wave NPA project does not create new significant or more severe impacts. No new mitigation is required.

Environmental and Regulatory Setting:

The Transportation/Traffic environmental and regulatory setting is presented in DEIR pp. IV.M-6 to IV.M-20 and traffic impact issues are discussed in the FEIR Vol. 1 pp. II-53 to II-57 and III.B-24 to III.B-28.

No changes to the local or regional road network or study intersections have occurred since the certification of the 2010 EIR. A new traffic report has been prepared for the Big Wave NPA by Hexagon Transportation Consultants dated July 17, 2014 and is presented in Attachment J. 2014 traffic counts show existing conditions have not significantly changed since the 2009 traffic report.

Discussion:

Would the proposed project:

- 16.a. Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including, but not limited to, intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?**

The 2010 EIR included a traffic analysis prepared by Hexagon Transportation Consultants (Hexagon; DEIR Appendix J). The EIR analysis of traffic impacts is presented in DEIR pp. IV.M-27-46). The EIR identified the project would add approximately 2,123 daily trips to roads in the project vicinity. The eastbound left turn movement at the intersection of Highway 1 and Cypress Avenue already operates at LOS F and project development would add vehicle trips to this intersection. The impact was identified as potentially significant requiring mitigation. The traffic analysis concluded that no improvements were possible at this location other than signalization. Highway 1 is a state highway under jurisdiction of the California Department of Transportation (Caltrans). Measure TRANS-1 as presented in the Final EIR (FEIR pp. II-53-57) and modified by the Board of Supervisors upon EIR certification required traffic reports at full occupancy of every 40,000 sq. ft. of office space, until full project occupancy, and submittal of traffic reports bi-annually after full project occupancy to ensure signalization would be timed with project impacts

(County of San Mateo 2014). With implementation of Measure TRANS-1 the EIR concluded project impacts would be mitigated to a less-than-significant level.

The 2010 EIR also addressed temporal construction traffic impacts related to haul truck traffic for imported or removed soils from grading operations (Impact TRANS-8; DEIR p. IV.M-21). The EIR concluded the impact of construction traffic would be less than significant. Measure TRANS-8 requiring a construction traffic control plan, was recommended to further reduce the less-than-significant construction traffic impacts. Measure TRANS-8, was revised by the County Board of Supervisors, to limit construction truck traffic to off-peak hours and routes which are least disruptive.

The Big Wave NPA project reduces Office Park building space from 225,000 sq. ft. to 189,000 sq. ft (Table 1). Hexagon prepared a Traffic Impact Assessment of the Big Wave NPA project (Attachment J) to assess the impacts of the revised project against current background conditions. The Big Wave NPA project would generate 1,479 daily trips, roughly 30% less than the vehicle trips attributed to the project in the 2010 EIR. This level of trip generation still meets the peak hour signal warrant analysis requirements for signalization of the Highway 1 and Cypress Avenue intersection as described in the 2010 EIR (FEIR pp. II-53-57).

As noted by Hexagon, existing traffic conditions at this intersection, based on 2014 traffic counts, do not warrant signalization. Therefore, signalization should be timed for implementation when project impacts are expected to occur. The Office Park would generate 1,248 of the 1,479 daily vehicle trips. The Office Park buildings would not be constructed until Phase 2 in Years 5-8 (see Project Description, Section 2.4). The 231 daily vehicle trips associated with the Wellness Center constructed in Phase 1 (Years 1-5) are not likely to trigger a signal warrant. Therefore, the need for signalization due to project traffic would not likely occur until occupancy of the Office Park begins. Prior to approving intersection improvements, Caltrans requires demonstration that warrants are met.

The Hexagon report identifies an alternative design approach to signalizing the Highway 1 and Cypress Avenue intersection. Caltrans now considers roundabouts whenever evaluating potential intersection improvements as an alternative to signalizations. Measure TRANS-1 is revised to address current traffic conditions, to include the consideration of a roundabout as an alternative to signalization per Caltrans requirements, and the timing of implementing signal/roundabout improvements (Attachment E). The feasibility and impacts of a roundabout have not been analyzed in this document. Measure TRANS-1 has been amended to require the roundabout to meet CEQA and permitting requirements should Caltrans require the roundabout instead of a signal. Measure TRANS-1 continues to fully mitigate the effects of Big Wave NPA project traffic.

The revision to Measure TRANS-1 to address the timing of intersection improvement and the addition of an optional improvement design does not comprise new mitigation to a new impact not previously considered but rather an enhancement of an existing measure; therefore, the revision is considered a minor change. The revised Measure TRANS-1 is presented below. The amended text is presented in Attachment E.

Mitigation Measure TRANS-1

The project's potentially significant impact to AM and PM delays at the intersection of Highway 1 and Cypress Avenue would be mitigated to a less-than-significant level with the installation of a traffic signal or roundabout as described below or other alternate mitigation acceptable to Caltrans and the County.

Signal Warrant Analysis

With the project, the peak hour signal warrant would be met at the intersection of Highway 1 at Cypress Avenue. With signalization, this intersection would operate at LOS C under both the AM and the PM peak hours. Under signalized conditions, the existing roadway geometry would be adequate to handle the anticipated traffic demand.

Hexagon states that it is not advisable to install a traffic signal prior to a warrant being met, and the warrant is not met under existing conditions.

Roundabout

The roundabout analysis at the intersection of Highway 1 and Cypress Avenue shows that a one-lane roundabout would operate with acceptable delay and LOS during the AM and PM peak hour under all project conditions on weekdays. During the midday peak hour on Saturday, there would be a need for a by-pass lane for the southbound right-turn traffic in order for the intersection to operate at an acceptable level of service C under existing plus project conditions.

Upon occupancy of the first building and at occupancy of each Office Park building until the warrant is met, the applicant shall submit a warrant study for the Highway 1 and Cypress Avenue intersection to the County to assess whether warrants for mitigation have been met. If and when warrants are met, the applicant shall obtain approval for implementation of any mitigation measure from Caltrans, comply with CEQA requirements, obtain any other necessary permits (e.g., encroachment permit, coastal permit), and install mitigation measure per County requirements.

The Big Wave NPA project would import 21,400 yds³ of gravel to the project site for use in building pads and parking areas. The total import volume requires roughly 1,000 haul trucks (bottom dumps with 22 cubic yard capacity). Gravel would be imported in ten loads a day for one month in Year 2, Year 4, and Year 5. Gravel would be imported in ten loads a day for a two-month period in Year 7. Although the gravel truck traffic is new, Measure TRANS-8 fully addresses construction traffic impacts related to the project import of gravel.

The 2010 EIR identified installation of water and sewer lines along Airport Street as part of the project's options for utility service. Any potential disruption of traffic caused by installation of the new water and sewer main segment in the Airport Street right-of-way would be similar to the effects of the previously addressed project. This impact is adequately addressed by Measure TRANS-8.

The Big Wave NPA project changes do not result in a new significant or more severe impact than that identified in the 2010 EIR, and there are no new circumstances or information that require the evaluation of new mitigation measures or alternatives.

The CCC and San Mateo County updated the County LCP in 2012 by adopting new LCP policies. New LCP Policy 2.52 requires a traffic impact analysis and mitigation plan for all new development that increases vehicle trips on Highway 1 and/or Highway 92. Traffic impacts associated with the Big Wave NPA project were evaluated by Hexagon (2014). As described above, Measure TRANS-1 reduces project traffic effects on Highway 1 at Cypress Avenue to a less-than-significant level. The project complies with LCP Policy 2.52 (Attachment D).

16.b. Conflict with an applicable congestion management program, including, but not limited to, level of service standards and travel demand measures, or other standards established by the County congestion management agency for designated roads or highways?

The 2010 EIR considered impacts to the County's Congestion Management Program (CMP) facilities under Impact TRANS-11. The intersections of Hwy 92 at SR 1 and Hwy 92 at Main Street (in Half Moon Bay) are CMP intersections. The 2010 EIR found impacts to these intersections to be less than significant. No mitigation was required.

These CMP intersections were studied by Hexagon Transportation Consultants in the Big Wave NPA Traffic Impact Assessment (2014). The revised project would add more than 100 trips to Highway 1 which is a CMP facility and the Property Owner(s) must prepare a trip reduction plan in accordance with the City/County Association of Government's CMP guidelines. No further mitigation is required.

16.c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in significant safety risks?

The 2010 EIR concluded the Big Wave project would not result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks. The proposed project does not include any aviation-related uses and would not have the potential to result in a change to air traffic patterns at nearby Half Moon Bay Airport. An anti-glare, anti-reflective surface would be used on all solar panels in order to minimize glare and reflection from the panels to ensure the project doesn't interfere with air traffic patterns. The project was found consistent with the existing 1996 Half Moon Bay Airport, Airport Land Use Plan.

The proposed project changes do not affect air traffic patterns. The project does increase setback distances of the Wellness Center buildings from the Airport Overlay Zone. The impact remains less than significant.

16.d. Significantly increase hazards to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

The 2010 EIR addressed traffic hazards under Impact TRANS-2 and TRANS-3 on p. IV.M-37 of the DEIR. The analysis concluded that the project would have a less than significant impact related to hazard due to design features or incompatible uses.

The Big Wave NPA Traffic Impact Assessment (Hexagon 2014) reviewed the proposed site plan (Figure 4) for potential hazardous conditions and found that ingress/egress and on-site circulation was planned in accordance with generally accepted traffic engineering standards. The new Big Wave NPA site plan does not introduce design features which create traffic hazards or creates conflicts with incompatible uses.

16.e. Result in inadequate emergency access?

The 2010 EIR addressed emergency access under Impact TRANS-4 on DEIR p. IV.M-38 and determined that the project would have a less-than-significant impact. Emergency access has not changed with the Big Wave NPA project. The Big Wave NPA site plan shows an emergency fire road (pervious pavement) traveling around the western portion and into the interior of the site near Lots 5 and 6 and Buildings 4 and 7. This road would be designed and constructed in conformance with San Mateo County and the Coastside Fire Protection District. The Big Wave NPA project does not create new significant or more severe impacts which require mitigation. The Big Wave NPA project would not result in a new significant or more severe impact than that identified in the 2010 EIR, and there are no new circumstances or information that require the evaluation of new mitigation measures or alternatives.

16.f. Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

The 2010 EIR addressed impacts to transit services and pedestrian and bicycle facilities on DEIR p. IV.M-40, Impact TRANS-6 and Impact TRANS-7. The transit service in the project vicinity is minimal and is only served by one bus route. The project did not generate a need for additional transit service and impacts to transit services were considered less than significant.

There are no sidewalks or pedestrian facilities in the immediate project vicinity (Airport Street). The 2010 EIR recommended that the proposed pedestrian trail on the project frontage along Airport Street be extended to the transit stop located on Airport Street near the La Grande Avenue intersection to facilitate and encourage transit usage by both residents and visitors.

The 2010 project was estimated to generate roughly 22 and 17 new bicycle trips during the AM and PM peak-hours. This volume of bicycle trips would not exceed the bicycle carrying capacity of streets surrounding the site and the increase in bicycle trips was not expected to require new offsite bicycle facilities.

Because the Big Wave NPA project is smaller than the 2010 project, it would reduce the demand for transit services and the use of existing pedestrian and bicycle facilities. The Big Wave NPA project does not create new significant or more severe impacts which require mitigation.

16.g. Cause noticeable increase in pedestrian traffic or a change in pedestrian patterns?

The 2010 EIR addressed impacts to pedestrian traffic and patterns on DEIR p. IV.M-40, Impact TRANS-7. The project may generate new pedestrian traffic to and from the project site and the Princeton area southeast of the project within easy walking distance. Pedestrians would be able to walk on the new side walk along the project frontage with Airport street but then would have to transition to walking on the road should once past the project site. Low traffic levels on Airport Street, Stanford, Yale, Harvard and other Princeton streets mean there would not be a conflict with pedestrian use of these streets.

The Big Wave NPA project would have fewer employees than the 2010 project and is expected to generate reduced pedestrian traffic from the office use proposed at the site. The surrounding pedestrian facilities have not changed since 2010.

The Big Wave NPA project does not create new significant or more severe impacts which require mitigation.

16.h. Result in inadequate parking capacity?

The 2010 EIR addressed project parking impacts on DEIR pp. IV.M-38-40 (Impact TRANS-5) and FEIR pp. II-53-57. The 2010 EIR concluded parking impacts would be less than significant and no mitigation was required.

All Big Wave NPA project related parking would be provided on-site in accordance with county parking requirements. A total of 554 parking spaces would be provided on the north and south parcels including 92 beach user parking spaces. The Big Wave NPA provides 462 parking spaces for the Office Park and Wellness Center buildings. Zoning Regulations require one space for every 200 feet of office space. Office Park buildings would be permitted based on parking demand and available spaces within the 462 space limit.

LCP Policy 10.22 requires 20% of parking be designated for coastal access parking. The Big Wave NPA project provides 92 parking spaces designated for beach users. The Big Wave NPA provides adequate parking capacity.

Sources:

Christopher A. Joseph & Associates. 2009. Big Wave Wellness Center and Office Park Draft Environmental Impact Report. SCH No. 2008102109. October 2009.

Christopher A. Joseph & Associates. 2010. Big Wave Wellness Center and Office Park Final Environmental Impact Report. SCH No. 2008102109. October 2010.

County of San Mateo. 2011. Inter-Departmental Correspondence. Planning and Building Department to Board of Supervisors. Consideration of: (1) the certification of an Environmental Impact Report (EIR) consisting of a Draft EIR (DEIR) and a Final EIR (FEIR), (2) a Use Permit, (3) a Major Subdivision, (4) a Coastal Development Permit, (5) a Design Review Permit, (6) a Grading Permit, and (7) adoption of an Ordinance approving the execution of a Development Agreement with the County of San Mateo, for the Big Wave Wellness Center and Office Park proposed on two undeveloped parcels (APN 047-311-060 and APN 047-312-040) located in the unincorporated Princeton-by-the-Sea area of San Mateo County. March 1, 2011. Board Meeting Date March 15, 2011.

Hexagon Transportation Consultants, Inc. 2014. Big Wave North Parcel Alternative Transportation Impact Analysis. July 17, 2014.

4.17 UTILITIES AND SERVICE SYSTEMS

<i>Would the project:</i>					
	Where Impact was Analyzed in 2010 EIR	<u>Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?</u>	<u>Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?</u>	<u>Any New Information Requiring New Analysis or Verification?</u>	<u>Do 2010 EIR Mitigation Measures Address/Resolve Impacts?</u>
17.a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	Impact HYDRO-1, DEIR pp. IV.H-47-48 Impact UTIL-4, DEIR pp. IV.N-16-18	No. Proposed changes eliminate on-site wastewater treatment and wastewater recycling. Wastewater after collection and transmission by GSD would be treated at the SAM wastewater treatment plant under a Joint Powers Agreement (JPA) with GSD. GSD and MWSD, as a Subcommittee under the SAM JPA, have constructed the Wet Weather Flow Management Project (WWFMP) downflow of the Portola Pump Station to mitigate impacts on the Intertie Pipeline System from wet weather sanitary sewer overflows.	No.	No.	The 2010 EIR found Impact HYDRO-1 to be less than significant. No mitigation was required. The 2010 EIR found Impact UTIL-4 to be potentially significant. Measure UTIL-4 required compliance with State Health Dept and RWQCB requirements. Measure UTIL-4 no longer applies as on-site disposal of wastewater is no longer proposed. The Big Wave NPA project does not create new significant or more severe impacts. No new mitigation is required.
17.b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	Impact UTIL-1, DEIR p. IV.N-15 Impact UTIL-2, DEIR p. IV.N-15 Impact UTIL-3, DEIR p. IV.N-16 Impact UTIL-5, DEIR pp.	No. Proposed changes include sewer service from GSD. Connection to the existing GSD 8-inch sewer line was previously proposed as an emergency contingency. Project changes	No.	No.	The 2010 EIR found Impacts UTIL-1, UTIL-2, UTIL-5, and UTIL-6 to be potentially significant. Measures UTIL-1, UTIL-2, UTIL-5, and UTIL-6 were required to reduce the impacts to less than significance.

<i>Would the project:</i>					
	Where Impact was Analyzed in 2010 EIR	<u>Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?</u>	<u>Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?</u>	<u>Any New Information Requiring New Analysis or Verification?</u>	<u>Do 2010 EIR Mitigation Measures Address/Resolve Impacts?</u>
	IV.N-18-19 Impact UTIL-6, DEIR pp. IV.N-19-20 Impact UTIL-7, DEIR p. IV.N-35 Impact UTIL-10, DEIR p. IV.N-37	do not involve construction of new wastewater treatment facilities or expanded capacities.			Measures UTIL-5 and UTIL-6 address wastewater treatment and recycle water use. These project features have been eliminated and the measures no longer apply to the project. Mitigation Measure UTIL-2 set forth in this Addendum adequately addresses this impact. Measure UTIL-1 fully addresses impacts associated with project changes. No new mitigation is required. The 2010 EIR found Impacts UTIL-3, UTIL-7, and UTIL-10 to be less than significant. No mitigation was required. The Big Wave NPA project does not create new significant or more severe impacts. No new mitigation is required.
17.c. Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	Impact HYDRO-5, DEIR pp. IV.H-54-56	No. Proposed changes reduce impervious surfaces from 3.0 acres to 2.5 acres and pervious surfaces (walkways and parking) from 7.5 acres to 5.4 acres. Project changes do not involve construction of new facilities or	No.	No.	The 2010 EIR found Impact HYDRO-5 regarding the quantity of surface water runoff as less than significant. No mitigation required. The Big Wave NPA project does not create new significant or more severe impacts. No new mitigation is required.

<i>Would the project:</i>					
	Where Impact was Analyzed in 2010 EIR	<u>Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?</u>	<u>Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?</u>	<u>Any New Information Requiring New Analysis or Verification?</u>	<u>Do 2010 EIR Mitigation Measures Address/Resolve Impacts?</u>
		expansion of existing facilities.			
17.d. Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	Impact UTIL-8, DEIR pp. IV.N-35-36 Impact UTIL-9, DEIR pp. IV.N-36-37 Topical Response 15: Project Potable and Recycled Water Demand, FEIR pp. II-80-84	No. Proposed changes reduce domestic water demand from 26,000 gpd to 9,765 gpd. Domestic supply would be provided by MWSD rather than on-site well with CCWD providing emergency backup. Fire flow would be provided by MWSD and on-site storage supplied by on-site well rather than CCWD.	No.	Yes. The County's Midcoast LCP Update was approved by the CCC in 2012. New LCP Policy 1.19 governs water and wastewater service connections for new development.	The 2010 EIR found Impacts UTIL-8 and UTIL-9 to be less than significant. No mitigation was required. The Big Wave NPA project does not create new significant or more severe impacts. No new mitigation is required.
17.e. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	Impact UTIL-2, DEIR p. IV.N-15	No. Proposed changes reduce wastewater generation from 26,000 gpd to 9,765 gpd. Treatment would be provided by GSD rather than an on-site wastewater treatment plant.	No.	No.	The 2010 EIR found Impact UTIL-2 to be potentially significant. Measure UTIL-2 was required to reduce the impact to less than significance. Measure UTIL-2 requires limiting project sewage flows to levels that can be accommodated by the existing GSD sewer main. Measure UTIL-2 has been amended to reflect the NPA's reduced wastewater generation to a level that can be serviced by GSD and to require project compliance with GSD's application, permitting, and sizing requirements

<i>Would the project:</i>					
	Where Impact was Analyzed in 2010 EIR	<i>Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?</i>	<i>Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?</i>	<i>Any New Information Requiring New Analysis or Verification?</i>	<i>Do 2010 EIR Mitigation Measures Address/Resolve Impacts?</i>
17.f. Be served by a landfill with insufficient permitted capacity to accommodate the project's solid waste disposal needs?	Impact UTIL-11, DEIR pp. IV.N-44-46	No. Proposed changes reduce the number of Office Park buildings and employees reducing construction materials waste and Office Park solid waste.	No.	No.	The 2010 EIR found Impact UTIL-11 to be potentially significant. Measure UTIL-11 was required to reduce the impact to less than significant. This measure fully addresses impacts associated with project changes. No new mitigation is required.
17.g. Comply with Federal, State, and local statutes and regulations related to solid waste?	Impact UTIL-12, DEIR p. IV.N-46	No. Proposed changes do not involve solid waste regulations.	No.	No.	The 2010 EIR found Impact UTIL-12 to be less than significant. No mitigation was required. As described in Section 2.3.6, the Big Wave NPA Project must comply with Federal, State, and local statutes and regulations related to solid waste. Hence, the Big Wave NPA project does not create new significant or more severe impacts. No new mitigation is required.
17.h. Be sited, oriented, and/or designed to minimize energy consumption, including transportation energy; incorporate water conservation and solid waste reduction measures; and incorporate solar or other alternative energy sources?	Impact UTIL-13, DEIR pp. IV.N-57-59	No. Proposed changes reduce Office Park business space and its energy requirements. No changes are proposed to the project's energy efficiency design measures for LEED certification.	No.	No.	The 2010 EIR found Impact UTIL-13 to be less than significant. No mitigation was required. The Big Wave NPA project does not create new significant or more severe impacts. No new mitigation is required.

<i>Would the project:</i>					
	Where Impact was Analyzed in 2010 EIR	<i>Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?</i>	<i>Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?</i>	<i>Any New Information Requiring New Analysis or Verification?</i>	<i>Do 2010 EIR Mitigation Measures Address/Resolve Impacts?</i>
17.i. Generate any demands that will cause a public facility or utility to reach or exceed its capacity?	See Responses 14.a-e, 15.a-b, and 17.a-f.	See Responses 14.a-e, 15.a-b, and 17.a-f.	No.	No.	See Responses 14.a-e, 15.a-b, and 17.a-f.

Environmental and Regulatory Setting:

The Utilities and Service Systems environmental and regulatory setting is discussed in DEIR pp. IV.N-1 to IV.N-10; IV.N-21 to 31; IV.N-39 to 42; and IV.N-51 to 56. No substantial changes in the setting have occurred since certification of the 2010 EIR except that GSD and MWSD, as a Subcommittee under the SAM Joint Powers Agreement (JPA), have constructed the Wet Weather Flow Management Project (WWFMP) downflow of the Portola Pump Station to mitigate impacts on the Intertie Pipeline System from wet weather sanitary sewer overflows.

Discussion:

Would the proposed project:

17.a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

The 2010 EIR addressed wastewater treatment requirements in Impact HYDRO-1 (DEIR pp. IV.H-47-48) and Impact UTIL-4 (DEIR pp. IV.N-16-18). Project wastewater would be treated onsite and used for recycle water. The project would demonstrate the ability to comply with Title 22 Water Recycling Criteria. Measure UTIL-4 requires compliance with State Health Department and RWQCB requirements for wastewater recycling. With implementation of this measure, the 2010 EIR concluded the impact is reduced to a less-than-significant level.

The Big Wave NPA project eliminates onsite wastewater treatment and use of recycle water. With this change, the project has no impact regarding exceedence of wastewater treatment requirements.

17.b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Water Facilities. The 2010 EIR addressed construction of new water facilities in Impact UTIL-7 (DEIR p. IV.N-35) and Impact UTIL-10 (DEIR p. IV.N-37). The on-site well had the production rate capacity to meet the estimated net potable water demand after use of recycled water for toilet flushing (DEIR p. IV.N-34). The project proposed annexation and connection to the CCWD as a back-up emergency domestic supply and for fire flow water service. CCWD was estimated to have the capacity to deliver necessary fire flow to the project. The 2010 EIR concluded project impacts on the existing water treatment facilities were less than significant. The quality of the onsite well water was tested in June 2009 and the results showed the water quality is suitable for domestic community water supply. The project proposed further treatment with an RO treatment system and UV disinfection to ensure high water quality. The EIR concluded the impact of the water treatment system was less than significant.

The Big Wave NPA would be supplied domestic use and fire suppression water by MWSD rather than the on-site well. Water would be delivered to the site from an 8-inch water main

located in Airport Street. This water main has sufficient capacity to deliver domestic use supplies (MWSD 2014a). MWSD also has sufficient capacity to fill the proposed on-site 200,000 gallon tank and refill the tank whenever needed (MWSD 2014b). The proposed storage tank would be connected to the MWSD system and filled with potable water by MWSD. Connecting to the MWSD requires a detailed fire system design and analyses satisfying both MWSD and the Coastside County Fire Protection District. This would be required as part of the building permit process. The fire sprinkler zones and hydrants would be sized to match the required fire flow.

According to the Deputy Fire Marshall, Coastside Fire Protection District, the current fire flows for the Big Wave project area were tested on May 9, 2012 and at that time were 527 gallons per minute (gpm) at 20 pounds per square inch (psi). Since then, there have been system improvements that have likely improved the fire flow numbers. Additionally, the CCC has approved a new 500,000 gallon water tank in the MWSD, Alta Vista Tank #2, which is now out to bid and should be online prior to Big Wave NPA occupancy.

To ensure that fire flow requirements are met, the Big Wave NPA would provide water storage on-site as described in Project Description, Section 2.3.7. The 100,000 – 200,000 gallon storage tank would be located on the basement level of Wellness Center Building 3 and would not require additional excavation. Booster pumps and engine would also be located within the building footprint. According to the Deputy Fire Marshal, Coastside Fire Protection District, the project design features would meet the estimated fire flow requirement of 2,000 gpm. The project change does not result in new significant or more severe impacts to water facilities than those described in the 2010 EIR.

Wastewater Facilities. The 2010 EIR addressed on-site treatment of wastewater and connection to GSD as a contingency to treat surplus wet weather flows or as an emergency backup service (DEIR pp. IV.N-11-20). Connection to GSD requires installation of 2-inch pressurized sewage lines on the north parcel, a 6-inch sewer line on the south parcel, and 1900 feet of 8-inch gravity sewer line along Airport Street to connect to the existing GSD sewer line at Airport Street and Stanford Avenue. The 2010 EIR identified that the GSD sewer line serving the Big Wave project had an insufficient capacity to accommodate the project's wastewater generation rate of 26,000 gpd. Measure UTIL-2 required the project to be redesigned in order to limit wastewater generation rates to those that can be accommodated by the existing 8-inch sewer line serving the project site or provide for necessary expansion of the sewer main facilities.

The Big Wave NPA project would reduce wastewater generation from 26,000 gpd to 9,765 gpd fitting the design capacity of the 8-inch sewer line in accordance with Measure UTIL-2. GSD has indicated that it has the capacity to serve this reduced wastewater flow (MWSD 2014a). Additionally, GSD and MWSD, as a Subcommittee under the SAM Joint Powers Agreement (JPA) have constructed the Wet Weather Flow Management Project (WWFMP) downflow of the Portola Pump Station to mitigate impacts on the Intertie Pipeline System from wet weather sanitary sewer overflows.

Measure UTIL-2 has been incorporated into the Big Wave NPA project design to address the project's impact on the GSD infrastructure. Measure UTIL-2 has been amended, as shown in Attachment E, to require the applicant to file a complete Application with and obtain a Sewer Connection Permit from GSD. The applicant shall construct an 8-inch gravity sanitary sewer main line complying with GSD standard specifications and details that would run approximately 1,900 ft. north along the Airport Street right-of-way from the existing manhole at Airport Street and Stanford Avenue to the northern limit of the northern parcel (Figure 8). GSD currently estimates the required size of this sewer main to be 8 inches in diameter, but the final system and sizing shall be based on a detailed sewer system design and analyses satisfying GSD.

No new mitigation is required. See Response 17.e below.

17.c. Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

The 2010 EIR addressed proposed stormwater drainage facilities in Impact HYDRO-5 (DEIR pp. IV.H-54-56). The EIR assessed the impact of construction and post-project stormwater discharges on site for various size storms. The EIR determined that there are no existing or planned stormwater drainage systems whose capacities would be exceeded by the increased stormwater runoff from the site.

The Big Wave NPA project would reduce the amount of developed surface (pervious and impervious surface) on the project site from 10.5 to 7.9 acres. As a result, the quantity of project-related stormwater runoff discharged to the project site is below the level analyzed in the 2010 EIR. As a result, the Big Wave NPA project would not result in a new significant or more severe impact than that identified in the 2010 EIR, and there are no new circumstances or information that require the evaluation of new mitigation measures or alternatives.

17.d. Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

The 2010 EIR identified the Big Wave project is located within the county urban/rural boundary and has been modified to propose water service from a public water utility (MWSD). The Big Wave NPA is designated by the General Plan for urban development (General Industrial). It is vacant property located between the Pillar Ridge Manufactured Home Community and storage warehouses on Airport Street. The 2010 EIR addressed the adequacy of water supplies to serve the project development in Impact UTIL-8 (DEIR pp. IV.N-35-36), Impact UTIL-9 (DEIR pp. IV.N-36-37), and topical Response 15: Project Potable and Recycled Water Demand (FEIR pp. II-80-84). The 2010 EIR concluded the impact was less than significant.

The Big Wave NPA project does not include changes that could result in a new significant impact or a substantially more severe impact than that considered in the 2010 EIR. San Mateo County Local Agency Formation Commission (LAFCo) has jurisdiction over the boundaries of cities and special districts and the extension of services outside jurisdictional boundaries. LAFCo adopted spheres of influence for Coastside agencies place the Big Wave Project site in the sphere of influence of the Coastside County Water District (CCWD) based on the adjacency to CCWD boundaries and infrastructure.

It is anticipated that Big Wave will obtain water for domestic use and fire suppression from MWSD. Because the project is outside the boundaries and sphere of influence of MWSD and within the boundaries and sphere of GSD and sphere of CCWD, MWSD must apply to LAFCo for a sphere of influence amendment and application to extend water service pursuant to Government Code Section 56133. The application to LAFCO is required to have a Plan for Providing Service (LAFCO, March 2014 letter). The estimated project demand for water is 9,765 gpd (Project Description, Table 5). The Midcoast LCP Update identifies MWSD has a supply of 0.67 million gpd and a supply of 0.886 million gpd when adding the new Alta Vista well which is expected to be completed prior to Big Wave NPA occupancy. Projected demand is 0.95 million gpd. MWSD confirms that it has available sources and supply of water to meet the project anticipated domestic water demand of 8,800 +/- 20% gpd and fire suppression demand (MWSD 2014a). This 20% margin confirms project water demand can be met up to 10,560 gpd.

The project property is designated for service by water and sewer utilities and therefore meets the definition of infill land under LCP Policy 1.20. LCP Policies 1.3, 1.4, 1.16, .18 and 1.19 direct new development to existing urban areas and rural service centers to (1) discourage urban sprawl, (2) maximize the efficiency of public facilities, services, and utilities, (3) minimize energy consumption, (4) encourage the orderly formation and development of local governmental agencies, (5) protect and enhance the natural environment, and (6) revitalize existing developed areas. LCP policy 1.18 specifically requires new development to be concentrated in urban areas by requiring infill development. LCP policy 1.20 defines infill as development of vacant land in

urban areas that is served by sewer and water utilities. Further, LCP policy 2.14 states that urban services are to be provided in urban areas and not within rural areas.

Proposed water service to this property is consistent with LCP Policies 1.3, 1.4, 1.16, and 1.18.

LCP Policy 1.19(c) allows new connections to MWSD for water service only if consistent with the MWSD Public Works Plan (Coastal Commission PWP No. 2-06-006), Chapter 2 of the LCP, and all other applicable policies of the LCP as amended. The project complies with applicable policies as described in Attachment D. As a result, the project change does not result in a new significant impact requiring new mitigation.

17.e. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

GSD has reviewed the project wastewater generation rate initially estimated at 8,800 gpd. Based on that rate, GSD estimated that it has sufficient wastewater collection, transmission and treatment capacity to accommodate the NPA (GSD 2014). GSD estimates that the 8-inch sewer line in Stanford Avenue and the Princeton Pump Station has adequate capacity to accommodate the addition of the expected maximum sewage flow from the Big Wave NPA project, including the current estimate of wastewater generation of 9,765 gpd. The increase is based on the recalculation of 20 Wellness Center employees as live-in residents and the addition of the boat storage area restroom. Final wastewater generation and impact calculations would be determined by GSD at the time an application for a Sewer Permit is received by GSD. No new impacts are anticipated to occur and no new mitigation measures are required.

17.f. Be served by a landfill with insufficient permitted capacity to accommodate the project's solid waste disposal needs?

The project site would be served by Recology and the Ox Mountain Landfill. BW Recycling would recycle a minimum of 50% of its solid waste with a goal to eventually recycle 95% of its solid waste. Measure UTIL-11 requires for waste separation bins on-site during construction to facilitate recycling of project construction materials. The Applicant would be required to prepare a recycling program to collect recyclable materials (paper, metal, glass, and other materials) at the Office Park and Wellness Center. The Big Wave NPA project would reduce the number of Office Park buildings by three buildings with a corresponding reduction in the amount of solid waste generated. The Big Wave NPA project would not result in a new significant or more severe impact than that identified in the 2010 EIR, and there are no new circumstances or information that require the evaluation of new mitigation measures or alternatives.

17.g. Comply with Federal, State, and local statutes and regulations related to solid waste?

The 2010 EIR addressed compliance with solid waste regulations in Impact UTIL-12 (DEIR p. IV.N-46). According to the EIR, unincorporated areas of the County divert 65% of the waste stream from the landfill. The project creates no conflicts with waste regulation. The EIR concluded the impact is less than significant. No mitigation was required.

The Big Wave NPA project changes do not introduce conflicts with solid waste regulations. As described in Section 2.3.6, the Big Wave NPA Project must comply with Federal, State, and local statutes and regulations related to solid waste. Per GSD requirements, the applicant shall incorporate water conservation and solid waste reduction measures and comply with GSD District Code provisions regarding garbage and recycling service (currently found in Article III), as well as any applicable State or Federal Law related to garbage and recycling and diversion from the solid waste stream. Hence, the Big Wave NPA project would not result in a new significant or more severe impact than that identified in the 2010 EIR, and there are no new circumstances or information that require the evaluation of new mitigation measures or alternatives.

17.h. Be sited, oriented, and/or designed to minimize energy consumption, including transportation energy; incorporate water conservation and solid waste reduction measures; and incorporate solar or other alternative energy sources?

The 2010 EIR addressed energy demands of the project in Impact UTIL-13 (DEIR pp. IV.N-57-59). As described in the EIR, the project would supply a majority of energy for heating, cooling, and electrical demand with renewable energy including solar heat, photovoltaic panels, wind generation, backup cogeneration with a natural gas generating, and geothermal cooling. All buildings would be designed to meet LEED certified construction. The EIR concluded the impact is less than significant. No mitigation was required.

The Big Wave NPA project is smaller in scale and would have reduced energy demands from the levels analyzed in the 2010 EIR. The Big Wave NPA project still includes renewable energy components with some modifications such as the elimination of wind generation. The Big Wave NPA project would not result in a new significant or more severe impact than that identified in the 2010 EIR, and there are no new circumstances or information that require the evaluation of new mitigation measures or alternatives.

17.i. Generate any demands that will cause a public facility or utility to reach or exceed its capacity?

See Responses 14.a-e, 15.a-b, and 17.a-f. In addition, voter-adopted 1986 Measure A precludes expansion of infrastructure capacity beyond buildout under the Local Coastal Program, but the Big Wave NPA Project would not generate demands requiring such an expansion.

Sources:

Byers, David J., Letter to Jonathan Wittwer. Dated April 8, 2014. Re: Committee for Green Foothills, et al v County of San Mateo, et al San Mateo County Superior Court Case No. 505205 (consolidated: Settlement Discussions Evidence Code 1152 Inadmissibility)

Christopher A. Joseph & Associates. 2009. Big Wave Wellness Center and Office Park Draft Environmental Impact Report. SCH No. 2008102109. October 2009.

County of San Mateo. 2013. Local Coastal Program Policies. June 2013.

Granada Sanitary District. Letter to Camille Leung, San Mateo County Planning and Building Department. Re: Planning Permit Application Referral Primary Permit: PLN2013-00451, APN: 047-311-060, Location: Pillar Point Marsh, Owner: Big Wave LLC; Big Wave Group. April 11, 2014.

MacLeod and Associates. 2014. Civil Engineering Drawings. Sheet C-1 Vesting Tentative Map for Commercial and Residential Purposes "Big Wave". Sheet C2 Grading and Drainage Plan with Permanent Storm Water Controls. Sheet C-3 Utility Plan. Sheet C4 Sediment and Erosion Control Plan. Sheet C5 Detail Sheet. June 30, 2014.

Montara Water and Sanitary District (MWSD). 2014a. Letter to Jeff Peck and Dave Byers. Re: Big Wave Wellness Center and Office Park – Big Wave NPA (NPA). January 28, 2014.

Montara Water and Sanitary District (MWSD). 2014b. Email to Camille Leung, San Mateo County from Clemens Heldmaier, General Manager. RE: Proposed Use of Existing Ag Well. July 16, 2014.

San Mateo County LAFCo. 2014. Letter to David Byers, Esq. Subject: Revised Big Wave Project, LAFCo Process Related to Water Provision of Revised Project. February 10, 2014.

San Mateo County LAFCo. 2014. Letter to Steve Monowitz, San Mateo County Planning Department. Subject: CEQA Review for LAFCo consideration of water provision to Big Wave NPA (NPA) Big Wave Project. March 6, 2014

Schaaf & Wheeler. 2009. Technical Memorandum #1 (TM#1). Memo to Jennie Anderson, Christopher A. Joseph & Associates. Subject: Hydrologic Analysis of the Big Wave Project. May 15, 2009.

4.18 MANDATORY FINDINGS OF SIGNIFICANCE

	Where Impact was Analyzed in 2010 EIR	<u>Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?</u>	<u>Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?</u>	<u>Any New Information Requiring New Analysis or Verification?</u>	<u>Do 2010 EIR Mitigation Measures Address/Resolve Impacts?</u>
18.a. Does the project have the potential to degrade the quality of the environment, significantly reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	DEIR Environmental Impact Analysis pp. IV.A.1-IV.N-63 DEIR General Impact Categories pp. V-1-7 See Responses 4.a., 5.a, 5.b., and 5.c.	No. See Responses 4.a., 5.a, 5.b., and 5.c.	No.	No.	See Responses 4.a., 5.a, 5.b., and 5.c.
18.b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)	DEIR Cumulative Impacts in each Environmental Impact Analysis section pp. IV.A.1-IV.N-63 Impacts TRANS-9, TRANS-10, and TRANS-11 DEIR pp. IV.M-41-46	No. Proposed changes reduce project development that contributes to cumulative impacts.	No.	No.	The 2010 EIR found Impacts TRANS-9 and TRANS-11 to be potentially significant. Measure TRANS-1 was required to reduce the impact to less than significance. The 2010 EIR found Impact TRANS-11 to be less than significant. No mitigation was required. Measure TRANS-1 fully addresses cumulative impacts associated with project changes. The Big Wave NPA project does not create new significant or more severe impacts. No new mitigation is required.

	Where Impact was Analyzed in 2010 EIR	<i>Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?</i>	<i>Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?</i>	<i>Any New Information Requiring New Analysis or Verification?</i>	<i>Do 2010 EIR Mitigation Measures Address/Resolve Impacts?</i>
18.c. Does the project have environmental effects which will cause significant adverse effects on human beings, either directly or indirectly?	DEIR Environmental Impact Analysis pp. IV.A.1-IV.N-63 DEIR General Impact Categories pp. V-1-7	No. Proposed changes reduce the scale of development resulting in less environmental impacts.	No.	No.	The Big Wave NPA project does not create new significant or more severe impacts. No new mitigation is required.

Discussion:

Would the proposed project:

18.a. Does the project have the potential to degrade the quality of the environment, significantly reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

The 2010 EIR analyzed Big Wave project and determined that project impacts to biological resources and cultural resources would be mitigated to a less-than-significant level. The Big Wave NPA project reduces the development footprint affording larger setbacks from sensitive wetland and riparian corridor areas and avoiding known archaeological resources. See Responses 4.a-e and 5.a-d.

18.b. Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)

The 2010 EIR evaluated the potential for Big Wave Wellness Center and Office Park project impacts to combine with impacts from other past, present, and reasonably foreseeable projects and produce cumulatively considerable effects. The 2010 EIR listed 37 related commercial, industrial, residential, mixed use, and park projects considered in the EIR’s cumulative impacts analysis. These projects were under the jurisdiction of the County of San Mateo (specifically the Mid-Coast Area), the City of Pacifica, the City of San Bruno, the City of Half Moon Bay, and the Town of Hillsborough. Under the individual resource chapters (i.e., Chapters IV-A through IV-N), the 2010 EIR evaluated cumulative impacts as follows:

- The EIR found that the closest related project would be approximately 685 feet (0.13) miles away from the Big Wave Wellness Center and Office Park.
- The EIR found that impacts on aesthetics, agriculture, biological resources, cultural resources, geologic resources, hydrology, land use, public services, and utility systems would either not combine or generally be avoided, mitigated, or otherwise controlled

through site- and project-specific compliance with plans, policies, and regulations, and would not result in significant cumulative impacts.

- The EIR found that project construction and operation would not result in significant cumulative impacts on air quality or noise because the project would be consistent with air quality plans and cumulative noise levels would not exceed thresholds of significance.
- The EIR found that the project would not result in a significant cumulative impact on population and housing because the project would help offset the region's existing jobs/housing imbalance.
- The EIR found that the project would result in a less than significant cumulative impact on traffic (Impacts TRANS-9, TRANS-10, and TRANS-11) with the implementation of Measure TRANS-1.

The Big Wave NPA Project does not involve changes that could result in a new significant cumulative impact or a substantially more severe cumulative impact than that considered in the 2010 EIR for the following reasons:

- As identified in this checklist, the Big Wave NPA project would not result in a new or substantially more severe significant effect than that considered in the 2010 EIR. The Big Wave NPA project generally reduces the amount of development proposed at the project site and therefore results in less overall change and impact to the environment than described in the 2010 EIR. Supporting technical analyses confirm that the project would not result in a new significant or more severe aesthetic, air quality, geology, and traffic impact.
- The closest related project, a new 4,200 sq. ft. storage building completed in December 2013, remains approximately 685 feet away from the Big Wave NPA project southern parcel (where minimal development would not occur). Thus, there is no potential for Big Wave NPA noise impacts to combine in greater magnitude with the impacts of past, present, or reasonably foreseeable future projects.
- Past, present, and reasonably foreseeable future projects in the Mid-Coast Region of the San Mateo County, the City of Pacific, the City of San Bruno, the City of Half Moon Bay, and the Town of Hillsborough that were not considered in the 2010 EIR have been subject to site- and project-specific reviews as necessary under CEQA and other land use approval processes designed to avoid, mitigate, or otherwise control potential adverse environmental effects.

There have not been substantial changes with respect to the circumstances under which the Big Wave NPA project would be undertaken that involve new significant or substantially more severe environmental effects than that identified in the EIR. The project would result in substantially the same type of development, albeit at reduced intensity, and remain subject to plans, permits, and approvals that are substantially the same or more stringent than that considered in the 2010 EIR. Although some of the projects identified in the 2010 EIR have likely been modified, constructed as envisioned, or otherwise abandoned, these changes to related projects listed in the 2010 EIR have been incorporated as necessary into local planning efforts and new technical analyses prepared for the Big Wave NPA (e.g., the traffic report reflects the status of the past, present, and future projects identified in the 2010 EIR). The Big Wave NPA project would connect to the GSD and the MWSD; however, these connections would not result in a new significant or more severe significant impact because these districts have confirmed they have sufficient capacity to serve the Big Wave NPA.

In reviewing the Big Wave NPA project, the following new information related to potential cumulative impacts was considered:

- A list of past, present, and reasonably foreseeable future projects developed by the County of San Mateo County (11 projects).
- A list of past, present, and reasonably foreseeable future projects available from the City of Half Moon Bay (33 projects).

This new information is not considered to be of substantial importance because it does not show the project would result in a new or substantially more severe significant environmental effect that could not have been known at the time the EIR was certified.

The 2010 EIR concluded the Big Wave Wellness Center and Office Park Project would have a potentially significant cumulative traffic impact (Impact TRANS-9 and TRANS-10) but concluded the implementation of Measure TRANS-1 would reduce cumulative traffic impacts to less than significance. The Big Wave NPA project would not result in a new significant or more severe impact than that identified in the 2010 EIR, and there are no new circumstances or information that require the evaluation of new mitigation measures or alternatives.

18.c. Does the project have environmental effects which will cause significant adverse effects on human beings, either directly or indirectly?

The 2010 EIR considered environmental effects which could adversely impact human beings by analyzing health and safety issues such as exposure to air pollutant emissions (Responses 3.a-f), seismic and geologic safety risks (Responses 6.a-e), hazards and hazardous materials (Responses 8.a-g), high fire risk (Response 8.h), flooding and tsunami (Responses 8.i-l), and excessive noise levels (Responses 12.a-f), as well as lack of adequate services or utilities (Responses 14.a-e and 17.d-f). The EIR concluded that all these effects were less than significant or were mitigated to a level of less than significance.

The scale of the Big Wave NPA project has been significantly reduced from the original proposal. As described in the responses referenced above, the 2010 EIR adequately assesses the impacts associated with the Big Wave NPA project. The Big Wave NPA project would not result in a new significant or more severe impact than that identified in the 2010 EIR, and there are no new circumstances or information that require the evaluation of new mitigation measures or alternatives.

Sources:

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City of Half Moon Bay. 2014. Applications Under Review website. Planning Project Tracking Status Report, Updated July 9, 2014. (http://www.half-moon-bay.ca.us/index.php?option=com_content&view=article&id=99&Itemid=110), accessed July 10, 2014.

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