

CALIFORNIA COASTAL COMMISSION

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April 22, 2014

Camille M. Leung
Planning and Building Department
455 County Center, Second Floor
Redwood City, CA 94063

Subject: Big Wave North Project Alternative Project Referral (Big Wave Group, LLC and Big Wave Group, San Mateo County)

Dear Ms. Leung:

Thank you for the project referral materials provided by San Mateo County regarding the above referenced proposed project, which were received in the Commission's North Central Coast office on March 26, 2014. The proposed North Project Alternative (NPA) includes subdivision of two parcels (APN 047-311-060 subdivided into 7 lots and APN 047-312-040 subdivided into 3 lots); construction of 5 office park buildings totaling 162,000 square feet, 4 wellness center buildings totaling 97,500 square feet and related improvements; construction of a concrete restroom and boat storage parking; and grading of 735 cubic yards of cut and 13,000 cubic yards of fill, located on the west side of Airport Street, north of Stanford Avenue and across the street from the Half Moon Bay Airport, in the unincorporated Princeton area of San Mateo County. We have reviewed the submitted materials and would like to make the following comments:

- 1. San Mateo County Local Coastal Program (LCP) Update:** The current certified San Mateo County LCP is different than the version that was used as the standard of review for the originally proposed Big Wave project. On August 8, 2012, the Commission approved the San Mateo County Midcoast LCP update as submitted. Some of the new policies and standards incorporated through the Midcoast LCP update identify new requirements and standards applicable to the proposed project, including informational requirements. Exhibit A contained in the current project referral materials states, "The NPA is intended to fully respond to issues of concern of the CCC." We appreciate that the project and its review are being framed in this manner, and we would encourage you to consult the Commission's denial findings from August 2012 for detail on these concerns. In addition, we would note that because the proposed project will be evaluated against the current certified and updated version of the San Mateo County LCP, it may raise additional concerns not addressed by previous project reviews, perhaps most clearly in terms of ensuring adequate public services and infrastructure for new development while reserving capacity for priority land uses, consistency with timing of new housing development in the Midcoast, protecting coastal water quality, traffic mitigation, designation of prime agricultural lands and lands suitable for agriculture, and visual resources. Please ensure that adequate information is provided by the Applicants to allow an evaluation of consistency with the updated policies.

2. **Public Services:** The project must demonstrate consistency with the current LCP in regards to public services.

- **Water Supply:** The LCP Update substantively revised policies regarding water supply including but not limited to LCP Policy 1.18.1 which requires that, “no permit for development in the urban area shall be approved unless it can be demonstrated that it will be served with adequate water supplies and wastewater treatment facilities” consistent with the subsections contained in LCP Policy 1.18.1 including subsection c. Subsection c states, “New public water connections in the Montara Water and Sanitary District water service area will be allowed only if consistent with the MWSD Public Works Plan (CC PWP No. 2-06-006), Chapter 2 of the LCP, and all other applicable policies of the LCP as amended.”

The project referral indicates that water for the proposed project will be provided by Montara Water and Sanitary District (MWSD). Commission staff received a copy of the letter sent to the Big Wave Group, LLC’s (Applicants) representative, David Byers, dated February 10, 2014 from Martha Poyatos of the Local Agency Formation Commission (LAFCo) which outlines the process which the Applicants would need to complete in order to switch water providers from the Coastside County Water District (CCWD) to MWSD. The letter indicated that the Applicants would need to apply for a sphere of influence amendment removing their property from the CCWD sphere, place it in the MWSD sphere, and apply for and receive approval from LAFCo for extension of water service outside MWSD boundaries. This amendment would involve an evaluation under CEQA which the County plans to provide with the revised Environmental Impact Report (EIR) for the entire project as indicated on March 18, 2014 in a meeting Coastal Commission staff attended with staff from the County, the project Applicants and their representatives, MWSD staff, and LAFCo.

We would prefer that the project resolve LAFCo and related water issues prior to the County taking a final coastal development permit (CDP) action. Our current understanding, though, is that the County intends to take action before that process is complete, relying on the CEQA document to demonstrate that the water issues with the project (including adequacy of services and LAFCo service provider change) are adequately resolved for LCP purposes. We are concerned with this approach, including in terms of ensuring that the CEQA documents provide an adequate basis from which to make a CDP decision in this respect, and also in terms of the sequencing and timing for the LAFCo determination, including in terms of ensuring that such changes are finalized when the CDP for the project is ultimately decided upon. At a minimum, the EIR prepared for the proposed project should be of sufficient detail to demonstrate that a change in sphere of influence and extension of a new water to serve the proposed project is consistent with LCP requirements and the MWSD Public Works Plan, including but not limited to, by illustrating adequate capacity reserved for priority land uses consistent with LCP Policy 2.8, consistency

with the timing of new housing development in the Midcoast area as outlined in LCP Policy 1.22, and adequacy of water to serve the proposed project.

- **Wastewater:** The LCP Update substantively revised policies regarding wastewater. To allow an evaluation of compliance with the LCP's wastewater policies, it appears that additional information is necessary to demonstrate that there is reliable wastewater/sewage capacity from Granada Sanitary District (GSD) to support the proposed project consistent with the LCP. In particular, the daily flow analysis provided is not clear. For example, it provides a total usage estimate of 48 gallons per day (gpd) in the written description for the Wellness Center, but then uses 44 gpd in the estimate in Table 3. Please ensure that the Applicants clarify these estimates and provide supporting information regarding how they were derived. In addition, please ensure that the Applicants provide an explanation of how the development and provision of services by GSD would accommodate the proposed flows. Please also ensure that the Regional Water Quality Control Board is consulted regarding wastewater issues, and their concerns addressed. Finally, signed agreements from GSD demonstrating adequate wastewater arrangements should be provided prior to the County taking a final CDP action.
- **Traffic:** The LCP Update substantively revised policies regarding traffic, including but not limited to, LCP Policy 2.57.1 which requires all proposals for new development in the Midcoast that generate any net increase in vehicle trips on Highways 1 and 92, except for a single-family dwelling, a second dwelling unit, or a two-family dwelling, to provide traffic studies that include mitigation measures that offset the project's impacts. Further, prior to CDP approval, the County must be able to make the finding that proposed mitigation measures are adequate to offset new vehicle trips generated by the project to the extent feasible. Please ensure that the Applicants develop and submit a traffic impact analysis and mitigation plan consistent with the requirements of LCP Policy 2.57.1 to allow the County to evaluate traffic impacts and make the requisite LCP findings prior to the approval of the CDP application. This plan should include an evaluation of impacts on Highway 1 segments and intersections based on summertime data, both for commuter peak periods and weekend/recreational peak periods.

Please also consult the Commission's August 2012 denial findings on these public services points for additional information and detail.

3. **Public Views:** The Applicants have previously submitted visual representations of the proposed project to the Commission including project viewpoints from the ridgeline looking East, and views of the proposed project from Highway 1, the airport, the runway north and the ridge trail which should be verified by the County for consistency with the visual resources policies of the LCP, including Policy 8.5 and 8.6. We would also encourage the County to convene a field meeting that allows the Applicants as well as Commission and County staff an opportunity to preliminarily evaluate the new proposed project in terms of visual concerns, and to discuss what type of visual analysis materials might be necessary to allow an evaluation of LCP consistency.

The project referral submittal also includes a landscaping plan to further provide for visual screening of the proposed project. The landscaping plan should include supplemental material demonstrating the capacity of the site to support the landscaping plan as proposed.

4. **Coastal Hazards:** Commission Staff has reviewed the *Sigma Prime Geosciences, Inc Fault Study*, dated February 2014. The fault trench study as submitted is insufficient to evaluate the risk of fault rupture at the site. The report should contain a trench log and continuous photographs (even if the soil horizon appears not to change across the trench), and the photographs should be of sufficient quality so that they can be used to evaluate soil features. The report should also describe previous studies, the location of nearby trenches, and age control based on soil development. In addition, the study recommends and proposes additional studies including a subsurface geotechnical study and a second fault trench. These additional studies are necessary to determine if the proposed project is consistent with the coastal hazards policies of the LCP. Commission staff recommends that the second trench is dug, logged and photographed properly as indicated in the description above so that the site can be properly evaluated relative to coastal hazards. Please explain when these studies will be conducted and provide the relevant information from the studies when available.

In regards to tsunami hazards, the modified project appears to partially address the requirements of Section 6326.2 of the LCP. For example, assuming that the maximum inundation of a tsunami would be +28 feet NGVD, the placement of all residential development at +30 to 34 feet NGVD will ensure all residential development will be at least 2 feet above water levels consistent with the LCP. However, the Applicants still need to demonstrate that the water level at this portion of the site will be less than 6 feet assuming a wave height of 15.5 to 19.5 feet, and submit designs for a pile supported building that, with sufficient pile depth, would be able to withstand the projected horizontal wave force. This information would need to be submitted and further evaluated in order for the Commission staff to provide our opinion regarding consistency with the LCP in regard to tsunami hazards.

5. **Lot Legality:** Commission staff still requires lot history information to determine if the subject lots to be developed are legal. In an email sent to Commission staff on February 4, 2014 on behalf of the Applicants from Scott Holmes, the Applicants stated that a copy of the ownership maps and legal boundaries were sent to the Commission after a meeting in Santa Cruz. We have checked internally and have no record of ever receiving those materials in the Santa Cruz office or the North Central Coast District office in San Francisco and therefore we do not have all the information we need to make a determination of lot legality. Please ensure that the Applicants provide all lot history information necessary to determine ownership and when and how lots were created, including evidence that the entirety of what is now APNs 047-311-050 and 047-312-030 are owned by the County and reserved for public recreational use.

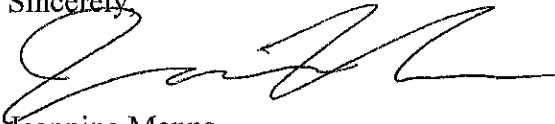
6. **Resource Protection:**

- The proposed project should incorporate the Countywide Stormwater Pollution Prevention Program best management practices and performance standards as outlined in LCP Policy 1.35 to protect the natural drainage swale, wetlands, and Pillar Point Marsh.

- Please ensure that the boundaries of the wetland areas and the location of the proposed buffers are identified on the site plan and that the Applicants provide an adequate evaluation of how the proposed wetland buffers will maintain the functional capacity of the wetland ecosystem consistent with the LCP wetland policies.
- LCP policies 5.2 and 5.3 require the designation of any parcel which contains prime agriculture lands or lands suitable for agriculture as agriculture on the LCP Land Use Plan Map (with exceptions that do not apply to the subject parcel). The subject properties contain prime agricultural lands. Please ensure that the Applicants provide an assessment of prime agricultural lands on the subject properties and an evaluation of the way in which the proposed project is consistent with the LCP's agriculture policies.

We appreciate the opportunity to comment on this project and for the extension of the comment deadline to April 22nd, 2014. We hope that these comments prove useful, and we look forward to additional coordination and discussion on the proposed project, including as new information and materials are developed moving through the County's CDP evaluation process. If you have any questions regarding these comments, please contact me at the address and phone number listed below.

Sincerely,



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