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September 2, 2014

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Planning and Building Department
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Redwood City, CA 94063

Subject: Addendum to the Big Wave Wellness Center and Office Park Project Environmental Impact Report (EIR) North Parcel Alternative, State Clearinghouse #2008102109, July 2014

Dear Ms. Leung:

Thank you for sending the Big Wave Wellness Center EIR Addendum (Addendum) provided by San Mateo County (County) regarding the above referenced project, which was received in the Commission's North Central Coast District office on July 31, 2014. The proposed Big Wave Wellness Center and Office Park North Parcel 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 consisting 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 preliminary comments:

- 1. Project Phasing:** Some aspects of the project phasing are unclear from the information provided in the Addendum. The Addendum states, "Phasing timeframes for the Office Park buildings are approximate and based on demand." What does this mean for the future maximum potential development of the site? And over what time frames? Without a clearly defined project description and timeline, it is difficult to fully evaluate the individual and cumulative impacts of the project, including in regards to public service (water, sewer, and traffic) availability and infrastructure, sensitive resource impacts, coastal hazards, and public views discussed further in the sections below. Please ensure that there is clear information on all aspects of project phasing, and that information showing the overall impacts of the project at its completion are clearly described, evaluated, avoided, and mitigated.

It appears from the Big Wave Business Operations description on pages 8-10 of the Addendum that the building owned by the Wellness Center, which would provide job opportunities to residents and "generate revenue to maintain the economic sustainability of the Wellness Center," will be housed in Building A. According to the Addendum, Building A is currently proposed to

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be constructed during Phase 3 which is proposed to occur in 8 to 15 years. If Building A contributes to the affordable housing component of the project, please explain how this meets the objectives and intents of the LCP for affordable housing in regard to the overall project, and whether such phasing needs to be adjusted to meet such LCP criteria.

In addition, the stated purpose of the restoration component to the proposed project landscape plan adjacent to the project site wetlands as stated in the Addendum is in part to help minimize the visibility of buildings and associated development for consistency with the visual resources policies of the LCP. If so, why is the actual landscape planting proposed to occur within the wetland buffer area on the North Parcel being delayed until Phase 3 and 4, when portions of the building construction will occur and be completed on the North Parcel during Phase 1? It is also not clear from the phasing description how the proposed project landscaping to screen the office park will be completed in line with the development phasing to provide for the necessary screening. Please provide information showing how proposed phasing and screening interact in such a way as to avoid and mitigate impacts as they occur.

2. **Allowable Uses:** The Wellness Center is proposed to be located on a parcel that is zoned M-1 (Light Industrial District), which uses do not include residential uses. Through the original Big Wave Project County approval, the County granted a Use Permit for the project, agreeing with the applicant's position that the Wellness Center was a sanitarium, which is allowed pursuant to County Regulation section 6500(d) within any district within the Urban Areas of the Coastal Zone, when found to be necessary for the public health, safety, convenience or welfare. There is no definition of "sanitarium" in the County regulations. Further, in order to issue a use permit for a sanitarium, it must be found "necessary for the public health, safety, convenience or welfare." The County found the sanitarium necessary in its original approval because there is a shortage of affordable housing. It is our understanding that the County intends to allow the NPA Wellness Center use as affordable housing. As defined by LCP Section 6102.48.6, affordable housing is "housing with a contract rent or price which is affordable by low and moderate income households." Please provide a clear description of the way the project meets the LCP's affordable housing tests, including in relation to project phasing (see also above).
3. **Water Supply:** LCP Policy 1.19 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 1.19 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 Addendum indicates that water for the proposed project will be provided by Montara Water and Sanitary District (MWSD). We 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 outlined the process which the Applicants would need to complete in order to switch water providers from their current provider, the Coastside County Water District (CCWD) to MWSD. The LAFCo letter indicated

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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 planned to provide with the revised EIR for the NPA as indicated in a meeting on March 18, 2014 between Coastal Commission staff, staff from the County, the project Applicants and their representatives, MWSD staff, and LAFCo. Regarding MWSD's application to LAFCo for the amendment, the Addendum states "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." This plan should be included in the Addendum so that it can be adequately evaluated.

In addition, as required by the certified MSWD Public Works Plan (PWP), when proposed development has a projected daily demand of over 200 gallons per day (gpd), as does the proposed project, the applicant must "provide additional analysis regarding the projected demand and potential for future growth and associated increased water demand. MWSD will determine, based on its existing supply and demand, whether the District has adequate capacity to serve the development, given requirements to reserve water supply for priority uses, allowances for additional residential connections for well conversions, and for building permits or Coastal Development permits or other entitlements authorized for issuance by San Mateo County in compliance with its LCP."

As of December 11, 2013, 47,041 gallons per day (gpd) were available for non-priority uses, such as residential, commercial and industrial uses. MWSD would need to demonstrate that there is adequate capacity to serve the NPA based on current estimates for non-priority uses consistent with the requirements of the PWP and LCP. MWSD should also provide an estimate of the actual amount of water consumption by land use currently used and the growth rate of development as they are required to monitor pursuant to LCP Policy 2.21, and evaluate how the proposed development and subdivision may affect the water consumption estimates outlined in the LCP. It will also be important for the MWSD to conduct this evaluation in light of any conditions that may have changed due to the recent drought.

We would prefer that the proposed 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 CDP action before that process is complete, relying on the Addendum 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 the fact that the current Addendum does not 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 by the County.

In short, the Addendum does not currently provide sufficient detail to demonstrate that a change in sphere of influence and extension of a new water source to serve the proposed project is consistent with LCP requirements and the MWSD PWP, including but not limited to, by

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illustrating adequate capacity reserved for priority land uses consistent with LCP Policy 2.8, and substantial evidence that there is adequacy of water to serve the proposed project. Please ensure that adequate information is provided to allow the County to conclude on these points in its CDP decision.

In addition, as part of resolving LAFCo and MSWD issues the estimates of project water demand appear to be low in comparison to estimates used for similar projects. Please ensure that the origin of these estimates is explained, and that a comparative analysis of water usage for other similar development within the Midcoast Area is provided. Also, the water demand for the Office Park Businesses is based on toilet flushes and hand washing and does not include estimates for water usage that may result from the proposed business uses which have the potential to include general office, research and development, light manufacturing, and storage uses. Please include these demands as part of the project water demand analysis, as the current estimates do not seem to reflect the maximum potential water demand for these uses. Please ensure that updated water demand estimates based on the maximum potential demand for the proposed uses are provided, and please make sure that all sources from which estimates are based are cited.

Similarly, the water estimate for the Wellness Center pool is based on toilet flushing, evaporation, and washdown but does not include the water required to fill the pool. These details should be included and added to the project water demand estimate. There is also a discussion in the Addendum about proposed water storage tanks for fire protection being used in lieu of the pool. Other sections of the Addendum seem to suggest that a water storage tank of 100,000 to 200,000 gallons is necessary for fire protection. In addition, the project plans indicate water storage tanks in addition to the pool. Please clarify whether the pool, water storage tank, or both are being proposed and evaluated in the Addendum. Please also specify the water tank estimates in the project water demand table so it can be adequately evaluated.

The current water demand table suggests that the on-site well will only support organic gardening and landscaping, as does Mitigation Measure HYDRO-6, while the description on page 14 states “the on-site well would be used for irrigation purposes and to fill a storage tank (up to 200,000 gallons) for fire protection.” Please clarify how the water storage tank for fire protection will be supplied and reflect this amount of up to 200,000 gallons within the water demand estimate table.

The NPA would also use water for required landscape screening, and these estimates need to be a part of the water supply and demand analysis.

Finally, it is not clear from the information provided how the water demand for the organic gardening and landscaping was estimated. Please include these details and a basis for these estimates. Since the water for the organic gardening and landscaping will be supported by the well which will also potentially fill the water storage tanks for fire protection as discussed above, the Addendum should include an evaluation of the well capacity and its ability to support the proposed uses and the two 6,000 gallon water tanks it currently supplies, consistent with the continuation of the adjacent sensitive habitats (consistency with LCP Policy 2.28). If as a result,

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increased well use would be needed for the proposed project, then this increased use should be evaluated for consistency with LCP Policy 2.27. In addition, since the proposed project would connect to a public water supply, the continued use of the well for new development should be evaluated for consistency with LCP Policy 1.19(f).

Any changes to the water demand estimates of the proposed project based upon response to these questions and comments should be included in the MWSD evaluation of water capacity.

4. **Wastewater:** The wastewater capacity is based on the water demand estimates. If the water demand estimates are updated/modified as discussed above, the wastewater estimates should also be updated/modified and the Addendum should explain how the proposed development and provision of services by Granada Sanitary District (GSD) would accommodate the new 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.
5. **Traffic:** The LCP Update substantively revised policies regarding traffic, including but not limited to, LCP Policy 2.52 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.

As described in the Addendum, "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." *The Big Wave North Parcel Alternative Drafted Transportation Impact Analysis* prepared by Hexagon transportation Consultants, Inc, July 17, 2014 included in the Addendum assumed that the Office Park would include "64,505 s.f. of office use, 40,316 s.f. of research and development (R&D) use, 32,253 s.f. of light manufacturing use, and 24,189 s.f. of storage space" but provided no basis for these estimates. Please include an explanation of how these estimates were derived. Since the Addendum states that usage and square footage will be determined by the prospective tenants, it is unclear whether the proposed development potential is accurately evaluated through the traffic study. In addition, LCP Policy 2.52 requires, "Calculation of new vehicle trips generated shall assume maximum occupancy/use of any approved development." The project trip generation estimates are based on average rates for different land uses. The highest usage rate reflected in these calculations is for office buildings. It would seem more appropriate to use the highest land use rate and square footage possible for any potential use that could be developed for the proposed Office Park as there seems to be some uncertainty as to the final mix of uses in the proposed development. This will ensure that the maximum potential traffic impacts, cumulative and otherwise, of the proposed project can be evaluated and mitigated for appropriately. Also, assuming maximum occupancy for the development consistent with the LCP, it is not clear why the AM and PM trip estimates in and out only total 199 and 192

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considering that the parking proposed is 525 spaces on the North Parcel (420 spaces for the Office Park, 42 for the Wellness Center, and 63 spaces for coastal access) and 56 for the South Parcel (29 for coastal access and 27 for boat use and storage). Lastly, please clarify if the weekend estimates in the traffic study reflect summertime data, and if not, please supplement the figures to ensure that peak summertime visitor use periods are accounted for in the analysis.

On Page 118, the Addendum states, “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.” Has this trip reduction plan been developed? If so, it should be included in the Addendum.

In short, the proposed project needs to be accompanied by a more complete traffic analysis that assumes maximum buildout and occupancy of the site and subsequent impacts to traffic.

- 6. Parking:** The proposed parking to support the development includes 525 spaces on the North Parcel (420 spaces for the Office Park, 42 for the Wellness Center, and 63 spaces for coastal access) and 56 spaces on the South Parcel (29 for coastal access and 27 for boat use and storage). The LCP zoning regulations require different amounts of parking based on use. Since the Office Park uses have not clearly been established and uses may vary depending on tenants and demand, it is not clear that there is enough space provided on the site to meet the potential parking demand associated with the proposed development. For example, the Addendum notes the Office Park square footage to be 189,000 square feet. Section 6119 of the LCP requires 1 parking space for 200 square feet of floor area for business offices. Thus, the maximum parking required could be up to 945 spaces. In addition, it is not clear how the parking demand for the Wellness Center was estimated. Please provide this information to reflect estimates in a worst case parking scenario consistent with parking supply and demand figures of Chapter 3 of the LCP zoning regulations. Finally, there are 20 spaces depicted on the North Parcel adjacent to the buildings that do not appear to have road access. Please explain how these spaces will be accessed and used.
- 7. Public Views:** The Addendum includes visual representations of the proposed project from various viewpoints. Have these simulations been site verified through the use of story poles or by other means? The Addendum 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, including with respect to water supply as further discussed above and the limited amount of space available due to the parking requirements. Page 37 described the soils to have “moderate limitations.” Please explain how these limitations may impact the ultimate success of the landscape screening plan.

We are interested in the modifications to landscaping, grading, and architecture requested by the Coastside Design Review Committee (CDRC) on July 10, 2014 and how this may affect other aspects of the project. We are also interested in reviewing the feedback from the CDRC on the lighting plan and how this may affect other aspects of the project after their review.

Lastly, as discussed previously, please provide better clarity on the proposed timing and completion of the landscaping plan in light of the currently proposed project phasing to ensure that development is screened appropriately as it is developed.

- 8. Coastal Hazards:** We have reviewed the *Sigma Prime Geosciences, Inc Fault Study*, dated February 2014 and also *Sigma Prime Geosciences, Inc Fault Study* dated April 2014 included in the Addendum. 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 February 2014 study recommends and proposes additional studies including a subsurface geotechnical study and a second fault trench. It is unclear why the recommendation to dig a second trench was removed in the April 2014 study included in the Addendum. These additional studies are necessary to determine if the proposed project is consistent with the coastal hazards policies of the LCP. Consistent with our letter dated April 22, 2014, we continue to recommend 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.

Also important to note, the new configuration places two of the Wellness Center buildings within the Alquist-Priolo Earthquake Fault Zones. As stated on the Department of Conservation Website, “ Alquist-Priolo Earthquake Fault Zones are regulatory zones that encompass surface traces of active faults that have a potential for future surface fault rupture. . . Before a project can be permitted, cities and counties must require a geologic investigation to demonstrate that proposed buildings will not be constructed across active faults. . . If an active fault is found, a structure for human occupancy cannot be placed over the trace of the fault and must be set back from the fault (generally 50 feet).”¹ Based on the information currently provided, we cannot conclude at this time that the site is safe from geological hazards consistent with the LCP until an adequate geologic investigation is provided as part of this Addendum.

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 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 to determine consistency with the LCP in regard to tsunami hazards. These designs should also comply with the requirements outlined in LCP Section 6825.3 for coastal high hazard areas.

¹ <http://www.conservation.ca.gov/cgs/rghm/ap/Pages/disclose.aspx>

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We recognize and appreciate that the residential living space has been elevated out of the tsunami hazard zone consistent with the requirements of the LCP. However, we also note that this restricts the square footage within the Wellness Center Buildings that can be used for residential uses resulting in 4 buildings to be developed to accommodate the space needed for residents. Have alternative site locations been considered that may be able to better accommodate this use and provide a greater amount of living space on less square feet of developed area? As part of the analysis of project alternatives, please evaluate whether residential uses may be better accommodated on a smaller project site out of the tsunami hazard area where such issues can be avoided.

- 9. Sensitive Habitats:** It is not clear from the information provided in the Addendum where the boundaries of all existing sensitive habitats occur on the project site, including the wetland and riparian corridor boundaries as defined by the LCP. Figure 4 does illustrate the California Coastal Commission wetland boundary on the South Parcel but this boundary is not clear on the North Parcel.

The Addendum states, “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.” Firstly, this statement should refer to the important habitat of Pillar Point Marsh not Pilarcitos Marsh. Secondly, it appears that the planned boat storage use is located only 100 feet away from the California Coastal Commission’s wetlands boundary and some areas of the proposed coastal trail sidewalk also appear to be located within this 100 foot area. The public parking and boat storage parking are also located within 150 feet of the Coastal Commission wetlands boundary. Has the project considered alternatives which would accommodate location of the public parking and boat storage out of the 150 foot buffer, including by moving all public parking to the North Parcel and expanding the boat storage on the South Parcel outside of the buffer? Please include such evaluation in the alternatives analysis.

It is also not clear how the proposed organic farming operations would be consistent with the continuation of the adjacent sensitive habitats. The description on Page 9 regarding the organic farming operations includes “the production of agricultural commodities including produce, chicken, and eggs” and a native plant nursery. Where will the keeping of chickens and the native plant nursery occur on the project site? Are they proposed to occur within the wetland buffer? Please better specify the activities proposed to occur within the wetland buffer and how these uses are consistent with LCP policy 7.19 and 7.3.

Lastly, how will the project ensure that the sensitive habitats and their respective buffers are protected from future development in perpetuity on the newly created lots?

- 10. Agricultural Lands:** As previously communicated to the County in a letter dated June 18, 2014, “all development on “prime agricultural soils,” “prime agricultural land” or “other land suitable for agriculture” as defined by the LCP is still subject to LCP agriculture policies that apply generally to such lands regardless of the designation, such as LCP Policies 1.3 and 5.22. These

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policies would apply to the proposed project in a similar manner as they applied to its predecessor project, and should be considered carefully in the evaluation of the project.” Attachment D of the Addendum does not include an evaluation of LCP Policy 1.3 which recognizes that some lands, including prime agricultural soils and sensitive habitats, included in the urban boundary should not be developed at relatively high densities. Please evaluate the proposed project’s densities as well as any potential alternatives, for consistency with LCP Policy 1.3.

11. Alternatives Analysis: It is going to be critical to the CDP decision that the County’s record includes an accessible evaluation of alternatives to the proposed NPA that is sufficient to identify alternatives to the proposed project that might lessen coastal resource impacts under the County’s Local Coastal Program (LCP). The proposed NPA project needs to be able to be understood in terms of possible alternative permutations (such as alternative siting and design) across the same set of evaluation criteria. Please ensure that the record includes an adequate explanation and analysis in this regard, including in light of concerns regarding allowable land use within the M-1 zoning district, public service (water, sewer, and traffic) availability and infrastructure to support the proposed project and subdivision, the nature and phasing of the project, sensitive resources, high density development on agricultural lands, coastal hazards, and public views, all as discussed further in the sections above.

12. Other:

Coastal Permit Requirements - In addition to what is described on Page 17, a CDP is also required for the proposed subdivision pursuant to LCP regulations.

Public access - The Big Wave transportation description on Page 10 discusses collecting fees for event parking. Will the public parking areas be used for these paid parking events or will other project parking be utilized? Please describe all aspects of proposed events and related elements, including parking fees.

South Parcel Development - How will the proposed project ensure that boat storage, public parking, public trail usage, restoration and landscaping, and the proposed organic gardening use, are the only uses that would occur on the South Parcel for the future life of the subdivided land?

We appreciate the opportunity to comment on the Addendum and this project. 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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From: "Manna, Jeannine@Coastal" <Jeannine.Manna@coastal.ca.gov>
To: 'Camille Leung' <cleung@smcgov.org>
Date: 9/30/2014 10:56 AM
Subject: Big Wave Follow Up Questions

Hi Camille,

In reviewing the notes from our meeting, a few other questions came up for me. Just wanted to make sure you had these sooner rather than later.

* We still need a better idea about what is being approved by this use permit, coastal permit for development and subdivision, and other approvals, and for how long. If all the development is not undertaken in the timeframe of any of the permits or approvals what happens? Will the subdivision remain in perpetuity? Will utilities stay allocated to the subdivided parcels in perpetuity? How will this be kept in check through special conditions?

* Will the permit conditions also require that the low income housing be for the specific use as a sanitarium?

* Can you provide better clarification on the sequencing of Lafco's determination and our potential appeal action.

* How was the rate for the wellness center estimated in the traffic study?

* We are very interested in seeing what the CDRC recommendations are and how that plays out in the project design.

Thanks!

Jeannine

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