



COMMITTEE FOR  
GREEN FOOTHILLS

January 12, 2015

Steve Dworetzky, Chair and  
Members of the Planning Commission  
County of San Mateo  
455 County Center, 2<sup>nd</sup> Floor  
Redwood City, CA 94063

**Re: Item #1 on the January 12, 2015 Agenda: Big Wave Project**

Dear Chair Dworetzky and Members of the Commission,

On behalf of Committee for Green Foothills, thank you for continuing this item from your November 12 meeting.

As you know, this is the largest project that has ever been proposed for the unincorporated Mid-Coast. The proposed project includes many components, and requires approvals of: (1) a Use Permit for the Wellness Center, outdoor parking uses in the Airport Overlay Zone and an Outdoor Boat Storage Use, (2) a Major Subdivision of the northern parcel into 7 lots and creation of up to 108, approximately 1,500 sq. ft., business condominium units and construction of 5 Office Park buildings totaling 162,000 sq. ft. and 3 Wellness Center buildings totaling 97,520 sq. ft., (3) a Minor Subdivision of the southern parcel into two lots and construction of a concrete restroom and boat storage parking area, (4) a Coastal Development Permit for all development and uses, (5) a Design Review Permit for the proposed structures and (6) a Grading Permit for 735 cy of cut for utility trenching and placement of 16,400 cy of gravel as fill. In addition, the Planning Commission must find that the project complies with CEQA, specifically an Addendum (dated July 2014) to the 2010 EIR.

At your November 12, 2014 meeting, CGF expressed our dismay that the project had inexplicably morphed into fewer, much larger buildings (a.k.a. the “4-Building Option”). The Office Park buildings would be reduced from five to three; the Wellness Center from four to one. The cumulative visual impacts from these monolithic structures would be far greater than even the original project, and would be severely out of compliance with LCP Policy 3.13 and the Community Design Manual.

In response to criticisms by CGF and others, the Applicant proposed a revised project, called the “8-Building Option”, at the November 12, 2014 Commission meeting. Your Commission directed that the “8-Building Option” be referred to the Coastside Design Review Committee, California Coastal Commission, and the Mid Coast Community Council, for their review and comment.

While CGF is relieved that the “4-Building Option” is no longer being considered, we still have serious concerns and reservations about the project’s scope and impacts. CGF also finds that there are still significant information gaps as detailed below.

County Subdivision Regulations require a clear, complete, and accurate Project Description, Site Plan, Grading Plan, and Vesting Tentative Map (VTM) for the northern parcel and Tentative Parcel Map (TPM) for the southern parcel, as well as elevations of buildings. The County Local Coastal Program (LCP) also requires specificity as to the type, intensity, and location of all uses and development.

Only recently was a Proposed Site Plan and other materials for the “8-Building Option” submitted to County Planning (January 7, 2015). Unfortunately these materials continue to be woefully inadequate.

### **Incomplete/Inadequate Vesting Tentative Map and Tentative Parcel Map:**

The materials submitted on January 7 do not comply with the requirements of the County Subdivision Regulations. Specifically the materials must include on the Vesting Tentative Map (VTM) and Tentative Parcel Map (TPM): (1) existing and proposed parcel lines and their dimensions (per Section 7011.2.b.(2)); (2) the locations of existing and proposed street, driveway and parking area improvements with type of pavement, curbs, gutters and sidewalks (per Section 7011.2.b.(5)); and (3) the location, width and purpose of all existing and proposed easements, together with all applicable building and use restrictions (per Section 7011.2.b.(6)). Additionally there must be a complete and adequate Grading Plan that shows existing and proposed topography.

The VTM and TPM are still conceptual and lack the required specificity and details required by the above-cited County Subdivision Regulations. These are essential requirements for the Maps and are not mere details that can be filled in later and/or approved at the Staff level. For example, the required boundaries and dimensions of each of the proposed parcels for the Office Park are not shown on the VTM. The side, rear, and interior façade elevations of the Office Park buildings show roll-up doors to facilitate deliveries. The VTM shows no access for vehicles to the industrial alleys between the buildings.

Project features that may well conflict with parking and access in these industrial alleys are scattered throughout other plans. For example, the landscape plan shows wine barrel planters on one side of the alleys, and the Grading, Utility, and Erosion Control Plan calls for 36” high lighting bollards spaced 30’ apart around all buildings. These features may interfere with deliveries/pickup and/or fire and emergency vehicles and temporary parking for manufacturing, industrial, storage or even office uses. Condition 88 requires revisions to the Plan that “improve courtyards between Lots 3,4, and 6...by celebrating the space, creating focal points for outdoor space in these locations.” How do courtyards and celebration of space fit with industrial alleys? Due to the undefined nature of the mixed uses at the Office Park, features that enhance office use may be completely unnecessary and even in conflict with other as-yet undetermined uses.

The TPM for the southern parcel does not include important details including layout of the required 92 coastal access parking spaces. Due to changes in this layout from previous TPMs it appears there is now inadequate area for 92 parking spaces; and the note on the VTM says “62 compact parking spaces”. The VTM and TPM must also indicate where key stormwater runoff facilities such as infiltration basins, dry wells, rain gardens, etc. that require dedicated space will be located,

as those essential facilities may reduce the areas now planned for parking or gardening/agriculture or impinge upon the 100' wetlands buffer. The VTM and TPM must also include the relocation of the unapproved agricultural water distribution line that the Owners constructed through County parkland between the northern and southern parcel without permits or permission from County Parks.

### **Incomplete/Inadequate Information regarding Visual Impacts:**

The community continues to have a high level of concern regarding the project's visual impacts, as does CGF. Due to the proposed project's location in the expansive agricultural fields adjacent to the sensitive habitats of Pillar Point Marsh, and scenic backdrop of Pillar Point Bluffs, its proposed new buildings, parking lots, fences, farming/gardening activities, landscaping and other components will create a sharp contrast to the existing agricultural/open space setting. For this reason, it is especially important for the public and decision makers to fully understand its visual impacts on adjacent sensitive resources, viewsheds, and community character. CGF recommends that story poles and the standard wide strip of orange netting be erected at the corners of all buildings so staff, the public and the Planning Commission can properly evaluate the height, mass and bulk of the proposed buildings.

### **Public Views/Design Review:**

CGF agrees with the Coastside Design Review Committee (CDRC), which has voted twice to recommend denial of the plans, finding that the project remains out of scale and out of character with the Princeton community. The project continues to be out of compliance with LCP Policy 3.13 Maintenance of Community Character and the Community Design Manual.

### **Traffic/Coastal Access:**

Access to the project site from Highway One is by only two narrow, substandard roads. The northern access via Cypress Avenue is also an important coastal access route for the Fitzgerald Marine Reserve and the Coastal Trail segment on Pillar Point Bluffs. Revised Mitigation Measure TRANS-1 regarding the timing of construction of either a traffic signal or roundabout at Cypress Avenue and Highway One addresses insufficient intersection capacity. However, Cypress Avenue is only 21 feet wide, and has deep roadside ditches, which creates serious safety issues for vehicles as well as pedestrians and bicyclists. Increased traffic associated with the Big Wave Project will exacerbate the inadequacy of this access route for both residents and coastal visitors. There are similar coastal access conflicts with the southern access via Capistrano Road through the maze of inadequate streets in Princeton, another popular visitor destination.

### **Southern Parcel Conservation Easement:**

The overall square footage and density of use of the northern parcel has been increased from 225,000 sq. ft. to 259,500 sq. ft. due to the transfer of density and relocation of the Wellness Center from the southern parcel. While outdoor boat storage is now proposed for Lot #1 on the southern parcel, there are no restrictions on more intensive development, leaving this area of Lot #1 free to

be developed with large industrial buildings allowed by the Waterfront Zoning District. A conservation easement or deed restriction on the remainder of Lot 1 should be required to ensure that the overall density of the two parcels is not increased in the future. Other outdoor storage uses including possible relocation of the propane tank storage facility that is currently next to the northern parcel are possible uses that could be allowed under such a conservation easement.

**EIR Addendum:**

There are references to the EIR Addendum and Final Addendum throughout the Staff Report. However there is no update to the Final Addendum dated November, 2014 which was hastily prepared for the "4-Building Option", and presented at the November 12, 2014 Planning Commission meeting. There must be consistency between the project you are approving and the project in the Final Addendum.

**Committee for Green Foothills position regarding the Proposed Project:**

The Staff Report states in numerous places that CGF supports the Planning Commission's consideration of the "8-Building Option". This should not be construed to indicate that CGF supports the project. As stated in our previous letter, CGF was aghast at the four building alternative that was precipitously and inexplicably presented to your Commission in November. By letter and statement at your hearing, CGF strongly urged that the "8-Building Option" be evaluated.

CGF is pleased to see new Conditions of Approval including: (1) Condition 73 which details the phasing plan and requires that if the project is not completed within 15 years, all remaining land within the building envelope shall be retained in open space; (2) Condition 5.k. which requires maintenance of rental rates as affordable to Extremely Low Income, Very Low Income, and Low Income people throughout the life of the project, and (3) Revisions to the project which now provide 100' of wetlands buffer, and 50' beyond the buffer restricted to gardening and farming, with easements to ensure those restrictions, in response to Coastal Commission staff recommendation. CGF also appreciates new Condition 7 which assures that each lot in the Office Park will have a minimum number of parking spaces assigned and ensures that no more than 420 parking space licenses shall be issued to Office Park business uses which addresses one of our major concerns.

However, given the myriad insufficiencies of the proposed project details as outlined above, and continuing lack of compliance with LCP visual policies as well as the coastal access policies of the LCP and Coastal Act, CGF opposes the project

Sincerely,



Lennie Roberts, San Mateo County Legislative Advocate