

CYPRESS POINT PROJECT SUPPLEMENTAL ENVIRONMENTAL EVALUATION REPORT

1. INTRODUCTION

This Supplemental Environmental Evaluation Report (PEER) provides an evaluation of the potential environmental effects of implementing the proposed Cypress Point project that are not assessed in the following standalone technical reports prepared for the proposed project:

- Aesthetics and Visual Resources
- Biological Resources
- Energy
- Geology and Soils
- Hydromodification Management
- Public Services and Utilities
- Air Quality & Greenhouse Gas Emissions
- Cultural and Tribal Cultural Resources
- Environmental Justice
- Hazards and Hazardous Materials
- Noise
- Transportation and Traffic

Recent environmental documents prepared for San Mateo County provide a list of environmental topics to be evaluated in environmental documents prepared pursuant to CEQA. This report addresses those environmental topics for which a separate technical report was not prepared, or for which a technical report was prepared, but certain checklist questions were not addressed. The topics addressed in this report include the following:

- Agriculture and Forestry Resources
- Hazards and Hazardous Materials
- Land Use and Planning
- Population and Housing
- Transportation and Traffic
- Geology and Soils
- Hydrology and Water Quality
- Mineral Resources
- Recreation
- Wildfire

The following sections provide impact analyses for CEQA checklist questions regarding these topics not addressed elsewhere, including brief discussions that provide evidence to support the impact conclusions. Although abbreviated compared to the analyses presented in single-topic technical reports, the analyses in this document are structured similarly, with a discussion of the proposed Cypress Point project's features relevant to the topic, the environmental setting, and an environmental evaluation.

For the resource topics evaluated in this report, four possible determinations can be made regarding the proposed project's impacts on the topic. These determinations are defined below.

"No Impact" means that it is anticipated that the project will not affect the physical environment on or around the project area related to that topic.

"Less-than-Significant Impact" means the project is anticipated to affect the physical environment on and around the project area related to that topic.

, but to a less-than-significant degree, so the adoption of mitigation measures is not required.

“Less than Significant with Mitigation Incorporated” applies to topics where the adoption of mitigation measures is required to reduce the impact related to that topic to “Less than significant.” In such cases, mitigation measures are listed, as well as a description of how they reduce the effect to a less-than-significant level.

“Potentially Significant Impact” means there is substantial evidence that an effect is significant, and sufficient feasible mitigation is available to reduce the impact related to that topic to “Less than significant”.

1.1 CHANGES SINCE LAST VERSION

This Supplemental Environmental Evaluation Report provides updates to the April 2019 version (titled Preliminary Environmental Evaluation Report) in order to include changes to the project made by Mid-Pen in response to comments from community members. These changes include:

- Increasing the setback of buildings from the property boundary adjacent to Carlos Street to a minimum of 20 feet;
- Reducing the maximum height of all buildings to 28 feet;
- Re-routing the pedestrian path providing access to Sierra Street.

Other minor changes to the text have been made to correct errors, improve readability, and ensure consistency among reports. None of these changes resulted in any changes to impact conclusions or mitigation measures.

For more information about the proposed project, please see *Cypress Point Project - Introduction and Project Description* (Stevens Consulting 2020).

2. AGRICULTURE AND FORESTRY RESOURCES

2.1 ENVIRONMENTAL SETTING

The proposed project site is located in a low-density residential neighborhood within the unincorporated community of Moss Beach. The California Department of Conservation (DOC) Farmland Mapping and Monitoring Program designates the project site as Urban and Built-Up Land and Other Land (DOC 2016). The U. S. Natural Resources Conservation Service (NRCS) identifies the project site as “not prime farmland” (USDA NRCS 2018). The location of the proposed project is within the Midpeninsula Regional Open Space District, but the project site is not in not within designated open space (MROSD 2018). The project site is not zoned for agricultural use, nor is it subject to a Williamson Act contract (San Mateo County 2018b). The site of the proposed project is not in an area zoned as forest land or timberland production (CDFW CNDDDB 2018).

2.2 ENVIRONMENTAL ANALYSIS

Impact: *For lands outside the Coastal Zone, would the project 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? Would the project conflict with existing zoning for agricultural use, an Open Space Easement, or a Williamson Act contract?* **No Impact.**

The project is located within the Coastal Zone and is not zoned for agricultural use. The site is not located within an Open Space Easement, nor is it subject to a Williamson Act contract. Because the proposed project is not located outside the Coastal Zone, and would not conflict with agricultural zoning, an Open Space Easement, or a Williamson Act contract, there would be no impact and no mitigation is required.

Impact: *Would the project 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 forest land to non-forest use?* **No Impact.**

The proposed project site is not zoned for farm land or for forest land; no such lands exist on the project site or in the vicinity. Because the proposed project involves no changes in the existing environment that would result in the conversion of existing farm land or forest land to non-agricultural or non-forest use, no impact would occur and no mitigation is required.

Impact: *For lands within the Coastal Zone, would the project 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?* **No Impact.**

The proposed project site soils have been designated as Class III, under both irrigated and non-irrigated conditions, and not appropriate for Brussels Sprouts or artichokes because of slopes and erosion hazards. There would be no impact and no mitigation is required.

Impact: *Would the project result in damage to soil capability or loss of agricultural land?* **No Impact.**

The proposed project is not zoned for agricultural land, and is not currently in agricultural use. No agricultural uses are anticipated for the proposed project. Because the proposed project does not involve agricultural use, and the site is not zoned for agricultural use, there would be no damage to soil capability or loss of agricultural land. There would be no impact.

Impact: *Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined in Public Resources Code section 4526), or timberland zoned Timberland Production (as defined in Public Resources Code section 51104(g))?* **No Impact.**

The proposed project is not zoned for forest land, timberland, or Timberland Production. Implementation of the proposed project would not conflict with existing zoning for forest land, timberland, or Timberland Production. There would be no impact and no mitigation is required.

3. CLIMATE CHANGE

Several questions from the San Mateo County CEQA checklist are addressed in the technical report *Air Quality and Greenhouse Gas Emissions Assessment* (Illingworth & Rodkin 2018). Those questions not addressed in that report are discussed below.

3.1 ENVIRONMENTAL SETTING

At its closest point, the project site is located approximately 750 feet from the coastline of the Pacific Ocean. The site slopes from east to west. Elevations of the project site range from approximately 77 feet above mean sea level (MSL) at the northwest corner to 189 feet MSL along the easterly boundary. A perennial stream (Montara Creek), located approximately 250 feet to the northeast of the project site, runs in parallel to the northern border of the site (prior to emptying into the Pacific Ocean).

Vegetative communities on the project site are classified mostly as grassland, coastal scrub, and urban, with Monterey cypress (*Cupressus macrocarpa*) and Monterey pine (*Pinus radiata*) forest along the northern boundary of the project site. The previously developed portions of the site are largely barren due to the presence of remnant concrete building foundations. The site of the proposed project is not in an area zoned as forest land or timberland production (CDFW CNDDDB 2018).

The water surface elevation in Montara Creek is approximately 100 feet below the area of the site planned for development. The Cypress Point project site is located in Flood Zone X according to the Federal Emergency Management Agency (FEMA). In this area of San Mateo County, Flood Zone X delineates areas of minimal flood hazards. According to FEMA, the water surface elevation in Montara Creek in the vicinity of the project site would be 72 feet MSL during a 100-year flood event under current conditions. (FEMA 2017)

3.2 ENVIRONMENTAL ANALYSIS

Impact: *Would the project result in the loss of forest land or conversion of forest land to non-forest use, such that it would release significant amounts of GHG emissions, or significantly reduce GHG sequestering?* **Less-than-significant Impact.**

Much of the existing vegetation on the project site, especially along its perimeters would remain undisturbed by the proposed project. While some perimeter and interior trees would be removed during construction, the Monterey Cypress/Monterey pine forest along the site's northern border would be maintained. The scattered trees that would be removed would not be classified as a forest, and project implementation would not remove a sufficient number of trees to release significant amounts of sequestered carbon, or reduce the potential for future sequestration. Further, any vegetation removed will be offset by vegetation planted as part of the site landscaping. This would be a less-than-significant impact.

Impact: *Would the project expose new or existing structures and/or infrastructure (e.g., leach fields) to accelerated coastal cliff/bluff erosion due to rising sea levels?* **Less-than-significant Impact.**

The proposed project is located in an area whose cliff stability level is designated as high. At its nearest point, the site is located approximately 750 feet from coastal bluffs to the west. All proposed structures would be located beyond this minimum distance. The nearest infrastructure to the shoreline would be wastewater and stormwater mains constructed in the existing roadbed of Carlos Street, located at elevations between 92 feet and 127 feet MSL, no nearer than 600 feet from the Ocean. The project site does not currently contain leach fields, and no such fields would be created under the proposed project. San Mateo County has evaluated sea level rise and coastal erosion hazards in northern San Mateo County, including the project area. Though the results of this assessment cannot be guaranteed to be accurate at the level of individual parcels, they represent the best available information currently available. According to the Built Asset Exposure map contained in this evaluation, the project site is not located in an area that would be subject to coastal erosion through the year 2100. (San Mateo County 2018a)

Because of the distance between project structures/infrastructure and the nearest ocean bluffs and the site's elevation above sea level, the proposed project and its site-specific supporting infrastructure would not be exposed to accelerated coastal cliff/bluff erosion. This would be a less-than-significant impact and no mitigation is required.

Impact: *Would the project expose people or structures to a substantial risk of loss, injury or death involving sea level rise?* **Less-than-significant Impact.**

As noted in the previous impact, structures on the project site would be located at minimum of 750 feet from the coast at elevations above 158 feet MSL, and the project site would not be exposed to coastal erosion through the year 2100. Neither would the project site be exposed to coastal flooding under any of the scenarios evaluated by the County. (San Mateo County 2018a)

Because of the distance between project structures and the coast, and the elevation of the project above the sea, residents of the proposed Cypress Point development would not be exposed to a substantial risk of loss, injury or death involving sea level rise from coastal erosion or coastal flooding. This would be a less-than-significant impact and no mitigation is required.

Impact: *Would the project 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?* **No Impact.**

Under current conditions, the lowest structural floor elevation proposed for the Cypress Point project would be 158 feet MSL, approximately 86 feet above the existing calculated 100-year flood water surface elevation of 72 feet (FEMA 2017). Although anticipated future 100-year flood elevations have not been calculated, the difference in elevation between the existing flood water surface elevation and the project site would preclude the exposure of structures on the site to future 100-year flood hazards. Thus, there would be no impact.

Impact: *Would the project place within an **anticipated** 100-year flood hazard area structures that would impede or redirect flood flows?* **No Impact.**

No structures would be constructed within the existing or anticipated floodway of Montara Creek, whose low water channel is located approximately 250 feet north of the project site with an existing floodwater elevation approximately 86 feet below the project's minimum structural floor elevation. Due to the horizontal and vertical separation between developed areas of the site and Montara Creek, there would be no impact and no mitigation is required.

4. GEOLOGY AND SOILS

A geotechnical investigation for the proposed project site was prepared by Rockridge Geotechnical (2017). The investigation included the boring of test holes and soil analyses. This analysis summarizes the evaluation in the Rockridge report and addresses those environmental topics not included in the Rockridge report.

4.1 ENVIRONMENTAL SETTING

The Rockridge report indicates that the Cypress Point project is located in the Coast Ranges geomorphic province of California that is characterized by northwest-trending valleys and ridges. Major active faults in the area are the Hayward, Calaveras, San Andres, and San Gregorio faults, although the project site is not located in an Earthquake Fault Zone, as defined by the Alquist-Priolo Earthquake Fault Zoning Act (DOC 2017). The report states that strong ground shaking could occur at the site during a large earthquake on one of the nearby faults, but notes that the risk of surface faulting and ground failure is very low. The potential for liquefaction and liquefaction-related hazards, such as lateral spreading, is defined as nil; the potential for landsliding at the site, under both static and seismic conditions, is deemed to be low. (Rockridge Geotechnical 2017).

The San Mateo County General Plan section on geotechnical hazards indicates that the proposed project site is located in an area of high coastal cliff stability. It also indicates that the project site is not located in areas of high landslide susceptibility or tsunami and seiche inundation, but ground shaking is a potentially serious hazard (San Mateo County 1986).

Soils on the site of the proposed project are classified by the United States Department of Agriculture, Natural Resources Conservation Service Web Soil Survey as Typic Argiustolls, loamy-Urban land association, 5 to 15 percent slopes (USDA NRCS 2018). This soil type is rated as somewhat limited for shrink-swell potential and slope, and severely limited for soil erosion.

Because construction of the Cypress Point project would disturb one or more acres of soil, the project proponent will be required to obtain coverage under the State Water Resources Control Board's (SWRCB) General Permit for Discharges of Storm Water Associated with Construction Activity Construction General Permit Order 2009-0009-DWQ. Construction activities subject to this permit include clearing, grading, and disturbances to the ground such as stockpiling or excavation.

Under the Construction General Permit, prior to the initiation of grading, a project applicant is required to prepare and implement a Storm Water Pollution Prevention Plan (SWPPP) designed to reduce potential impacts to water quality during construction of the project. As required by regulations implementing the Construction Stormwater Permit, the SWPPP is required to include:

- Specific and detailed Best Management Practices (BMP) to mitigate construction related pollutants, including sediments. These controls would include practices to minimize the contact of construction materials, equipment, and maintenance supplies (e.g., fuels, lubricant, paints, solvents, and adhesives) with stormwater. The SWPPP would specify properly designed centralized storage areas that keep these materials out of the rain and/or protected from the wind.
- Dust control BMPs for the stabilization of exposed surfaces and to minimize activities that suspend or track dust particles. For heavily traveled and disturbed areas, wet suppression (watering), chemical dust suppression, gravel or asphalt surfacing, temporary gravel construction entrances, equipment wash-out areas, and haul truck covers can be employed as dust control applications. Permanent or temporary vegetation and mulching, and sand fences can be employed to prevent sediment-laden stormwater from reaching receiving waters, or to force stormwater to drop their sediment load on-site.
- The SWPPP is required to specify a monitoring program to be implemented by the construction site supervisor. SWRCB personnel, who may make unannounced site inspections, are empowered to levy appropriate fines if it is determined that the SWPPP has not been properly prepared and implemented.

The implementation of a SWPPP would also act to reduce minimize potentially significant impacts from soil erosion during construction.

4.2 ENVIRONMENTAL ANALYSIS

Impact: *Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking. Less-than-significant Impact with Mitigation Incorporated.*

The potential for substantial adverse effects as a result of ground shaking was determined to be significant by both the San Mateo County General Plan and the Geotechnical Investigation Report prepared for the Cypress Point project. This would be a significant impact. To reduce this impact to less than significant, implement Mitigation Measure GEO-1.

Mitigation Measure GEO-1:

Follow all recommendations of the Geotechnical Investigation report prepared for the Cypress Point Project (Rockridge Geotechnical 2017).

Implementation of the Geotechnical Investigation report recommendations for site preparation and construction would reduce the risk to people and structures as a result of ground shaking

to a less-than-significant level. No additional mitigation would be required. For additional information, see the Rockridge Geotechnical Investigation report.

Impact: *Would the project result in coastal cliff/bluff instability or erosion.* **Less-than-significant Impact with Mitigation Incorporated.**

The proposed project is located in an area whose cliff stability level is designated as high. However, construction of the proposed Cypress Point project would disturb a significant portion of the 10.875-acre project site. On-site soils are subject to severe hazards of erosion (NRCS 2018). This would be a significant impact.

Mitigation Measure GEO-2 requires the project to comply with the SWRCB Construction General Permit Order 2009-0009-DWQ. All construction activities would implement stormwater pollution prevention BMPs designed to reduce potential impacts to water quality during construction of the project. In addition, implementation of Mitigation Measure GEO-1 would require that the specific erosion control measures from the Geotechnical Investigation report prepared by Rockridge be implemented during construction of the proposed project.

Mitigation Measure GEO-2:

Comply with all requirements and implement all BMPs associated with the SWRCB Construction General Permit Order 2009-0009-DWQ.

Together, these measures would reduce this impact to less than significant by ensuring that reasonable BMPs would be implemented to minimize erosion during project construction, and no additional mitigation would be required. For additional information, see the Rockridge Geotechnical Investigation.

5. HAZARDS AND HAZARDOUS MATERIALS

5.1 ENVIRONMENTAL SETTING

Numerous evaluations of hazards and hazardous materials on the project site have been prepared, including the following:

- Phase I Report (AEI 2015),
- Phase II Report (AEI 2016a),
- Additional Subsurface Investigation and Water Well Evaluation (AEI 2018),
- Groundwater Sampling and Well Destruction Report (AEI 2018a),
- Responses to Comments (AEI 2020).

Queries of the State Water Resources Control Board Geotracker and California Department of Toxic Substances Control Envirostor hazardous materials sites indicate that the proposed project is not located on a known hazardous materials site (CA SWRCB 2017; CA DTSC 2018).

There are no schools located within one-quarter mile of the proposed project. The nearest school is Farallone View Elementary School, one mile northeast of the project site.

The Half Moon Bay Airport, a public airport owned and operated by San Mateo County, is located approximately 0.9 mile south of the proposed project site (San Mateo County 2018b, Google Earth Pro 2018). The airport is subject to the Half Moon Bay Airport Land Use Compatibility Plan (ALUCP), as adopted by the City/County Association of Governments in 2014 (HMB ALUCP 2014). The Plan is designed to encourage compatible land uses in the vicinity surrounding an airport.

California Governor's Office of Emergency Services oversees the preparation of emergency response and emergency evacuation plans for each county. These plans provide guidance on responding to possible emergency situations (e.g., fires, floods, earthquakes, etc.). They also provide a process for evacuating people from danger, and preventing or minimizing loss of life and property. The Area Office of Emergency Services and Homeland Security within the San Mateo County Sheriff's Office, Operations Division, provides advice and information regarding planning for disasters or emergency situations. There is no adopted Emergency Response Plan or Emergency Evacuation Plan for the proposed project area. (San Mateo County 2018c)

San Mateo County, like many other parts of California, has environmental characteristics that increase the potential for fires in wildland areas. The project site is located within a Community at Risk zone according to the County's Wildland Urban Interface Fire Threatened Communities Map (San Mateo County 2018c). Additionally, while the project site is not within a Hazardous Fire Area, there are open space areas approximately one-half mile to the southeast of the project site that extend to the foothills of the Santa Cruz Mountains. These areas are within the High and the Very High Fire Hazard Severity Zones. (CAL FIRE 2007)

The canyon of Montara Creek is located north of the site with a water surface elevation in Montara Creek approximately 100 feet below the area of the site planned for development. The Cypress Point project site is located in Flood Zone X according to FEMA. In this area of San Mateo County, Flood Zone X delineates areas of minimal flood hazards (FEMA 2017). Located at elevations ranging from 77 feet to 189 feet above mean sea level, the project site is not located in an area subject to tsunami hazards (Cal EMA 2009) The project site is not located in an area subject to inundation from dam failure (San Mateo County 2005).

5.2 ENVIRONMENTAL ANALYSIS

Impact: *Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials (e.g., pesticides, herbicides, or other toxic substances, or radioactive material)? Would the project 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?* **Less-than-significant Impact with Mitigation Incorporated.**

Investigations of the potential for the broad spectrum of hazardous materials (including pesticides, herbicides, other toxic substances, and radioactive materials) that could be present on the project site in soils and groundwater were completed by AEI Consultants (November 2015, February 2016, February 2018, April 2018, and August 2020). The transport and use of

hazardous materials during construction of the proposed project would be a significant impact. To reduce this impact to a less than significant level, implement Mitigation Measure HAZ-1.

Mitigation Measure HAZ-1:

MidPen will prepare a Site Management Plan for the project site prior to submitting an application for a Coastal Development Permit for the proposed project, and will comply with all requirements and implement all BMPs contained in the plan during construction of the project.

Implementation of these BMPs will ensure that all hazardous materials used during construction of the proposed project are handled in a safe manner. Please refer to the reports prepared by AEI Consultants for more details.

Additionally, an existing abandoned water well on the project site has been destroyed in accordance with San Mateo County and State standards. Therefore, this impact would be less than significant.

Impact: *Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?* **No Impact.**

There are no schools located within one-quarter mile of the proposed project. The nearest school is Farallone View Elementary School, one mile northeast of the project site. Because the distance from the proposed project to the nearest school is one mile, hazardous emissions or handling of hazardous materials, substances, or waste within one-quarter mile of a school would not occur. There would be no impact and no mitigation is required.

Impact: *Would the project 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?* **No Impact.**

According to queries of the GeoTracker and Envirostor Data Management Systems, the project would not be located on a site identified on a list of hazardous materials sites compiled pursuant to California Government Code Section 65962.5. As a result, implementation of the project would not create a significant hazard to the public or the environment. There would be no impact and no mitigation is required.

Impact: *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?* **Less-than-significant Impact.**

The proposed project would be located approximately 0.9 mile from the northerly boundary of the Half Moon Bay Airport. According to the Half Moon Bay Airport Land Use Compatibility Plan, the proposed project would fall within Zone 7, Airport Influence Area (AIA), the outermost area indicated in the ALUCP. The aircraft accident risk level in Zone 7 is considered to be low. The ALUCP places no limits on the number of dwelling units per acre within the AIA. The ALUCP provides height requirements for new development within Zone 7, allowing structures no higher than 300 feet. (HMB ALUCP 2014)

With a base elevation of up to 186.5 feet MSL for the building pads of the proposed housing units, and a maximum building height of 28 feet, all new development on the proposed project site would be in compliance with the height and residential density limitations of the ALUCP. Residents of the proposed housing units may experience over-flights from airplanes traveling to or from the Half Moon Bay Airport; however, the project does not require or attract large numbers of people to the site and does not include facilities or processes that create hazards to aircraft. The project structures and residents would not be exposed to or contribute to safety hazards. This would be a less-than-significant impact.

Impact: *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?* **No Impact.**

There are no private airports or airstrips within two miles of the proposed project site (Tollfreeairline.com). The proposed project does not include facilities or processes that would create hazards to aircraft in the area. No impact would occur and no mitigation is required.

Impact: *Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?* **No Impact.**

There is no adopted Emergency Response Plan or Emergency Evacuation Plan for the proposed project area. Other than the construction of interior roads within the proposed site, the project would have no direct effect on emergency use of any roadway. No changes to emergency response routes for the fire station located on Stetson Street would occur as a result of implementing the proposed Cypress Point project. Thus, the project would not result in the modification or blockage of any evacuation route, or result in an increased concentration of

large numbers of persons in an at-risk location. The proposed project would not impact emergency response or evacuation plans. There would be no impact and no mitigation is required. For more information, refer to the traffic impact report (Kittelsohn & Associates 2019) and the subsequent memo (Kittelsohn & Associates 2020).

Impact: *Would the project 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?* **Less-than-significant Impact.**

Wildland Urban Interface fires occur where combustible vegetation meets combustible structures, combining the hazards associated with wildfires and structure fires. The project site could be vulnerable to these wildland fires, should they occur. New residential structures constructed as part of the proposed project would include fire-resistant features that conform to modern fire and building codes, as well as fire detection or extinguishing systems. These newer residential structures would not be as vulnerable to fire as are older structures. The likelihood that a major structural fire will expand into a wildland fire before it can be brought under control is therefore significantly reduced. Similarly, wildfires will be less able to burn these buildings because of the preventative measures in place. Further, due to the proximity of the project site to the Moss Beach fire station, and the very short expected response time to reported fires, the likelihood of injuries is minimal (SMC 2018c). Therefore, the proposed project would not expose people or structures to a significant risk of loss, injury or death involving wildland fires; this would be a less-than-significant impact and no mitigation is required.

Impact: *Would the project 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? Would the project place within an existing 100-year flood hazard area structures which would impede or redirect flood flows? Would the project 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?* **No Impact.**

Located approximately 100 feet above Montara Creek, the project is not located within an existing floodplain. The project site is not located within the FEMA designated 100-year or 500-year floodplains. Because the project site would not be sited within an existing floodway, implementation of the proposed project would not act to impede or redirect flood flows. There would be no exposure of the project site and residences to inundation as a result of a dam or levee failure. Thus, no adverse impacts from flooding would occur. No impacts would result and no mitigation is required.

Impact: *Would the project expose people or structures to a significant risk of loss, injury or death involving inundation by seiche, tsunami, or mudflow?* **No Impact.**

Located at elevations ranging from 77 feet to 189 feet above mean sea level, the project site is not located in an area subject to tsunami hazards. Because the project area is located distant from any large reservoir, the project would not be located in an area subject to inundation

hazards from seiche. The geology of the site is not susceptible to landslide or mudflow. No impacts from such phenomena would occur and no mitigation is required.

6. HYDROLOGY AND WATER QUALITY

6.1 ENVIRONMENTAL SETTING

The Cypress Point project site totals 10.875 acres in Moss Beach, California, bordered by Carlos Street to the west, Lincoln Street to the east, 16th Street to the North and Sierra Street to the south. The site is relatively undeveloped and consists of several concrete slab-on-grade building foundations, native vegetation, unpaved service roads and water and electrical infrastructure.

The existing site slopes range from 10 percent to 50 percent with the high point on the east side of the property and the low point at the northwest corner. There is no existing storm drain infrastructure on the property. Storm water runoff is assumed to percolate on site and excess runoff surface flows towards Carlos Street and 16th Street, ultimately discharging to Montara Creek within the James V. Fitzgerald Area of Specific Biological Significance (ASBS) watershed area. Beside the 10.875-acre property, an additional 1 acre of offsite runoff drains through the project site and contributes to the overall tributary drainage area.

Montara Water and Sanitary District (MWSD) provides water services to the coastal communities of Montara, Moss Beach, and adjacent areas located north of El Granada and south of the Devil Slide Tunnel, in unincorporated San Mateo County, California. MWSD obtains groundwater from San Mateo Coastal Basin aquifers and surface water from the Montara Creek. The project site is located in the Half Moon Bay Terrace groundwater basin, primarily in the Upper Moss Beach groundwater subbasin, although a small portion of the site may encroach into the Lower Montara Creek subbasin. A study of the watersheds of several creeks in and around the Half Moon Bay Terrace Groundwater Basin found that for areas of higher elevation, direct precipitation is largely responsible for groundwater recharge, whereas for the lower elevation areas most recharge occurs locally from streams. Local recharge within the Upper Moss Beach groundwater subbasin is provided mainly by storms. According to studies, enhancing recharge from rainfall would benefit groundwater supplies in this subbasin. Lower Montara Creek is incised to bedrock, thereby limiting aquifer recharge from this reach of the stream (DWR 2016, Balance Hydrologics 2010)

Implementation of the proposed Cypress Point project would result in the construction of 71 units of affordable housing on roughly 5 acres of the site. New improvements would include town homes and flats, a community building, at-grade parking and access roads, an entry road connection to Carlos Street, pedestrian pathways and new pervious landscaping.

The existing site does not currently connect directly to the public storm drain system. However, project plans propose to make a new connection to the existing storm drain main on Carlos Street, which ultimately outfalls to Montara Creek. Proposed storm drain infrastructure for the project would consist of storm drain lines ranging from approximately 12-inch to 21-inch diameter, inlets at low points throughout the hardscape and landscape areas, manholes at

junction areas, building downspout connections, cleanouts and bio-retention infrastructure designed to comply with the development's dual requirements of stormwater treatment and Hydromodification Management (HM) requirements.

The SWRCB adopted the California Ocean Plan on July 6, 1972 with the latest revisions adopted in 2009. The Ocean Plan prohibits the discharge of waste to designated ASBS. ASBS are designated by the State Water Board as ocean areas requiring protection of species or biological communities to the extent that alteration of natural water quality is undesirable. (San Mateo County 2018d)

The Ocean Plan authorizes the SWRCB to grant an exception to the Ocean Plan provisions prohibiting waste discharge to ASBS where the board determines that the exception will not compromise protection of ocean waters for beneficial uses and where the public interest will be served. The County of San Mateo was included in the Water Board's General Exception to the California Ocean Plan with Special Protections adopted on March 20, 2012. The prohibitions and special conditions contained in the Special Protections are intended to ensure that storm water and nonpoint source discharges are controlled to protect the beneficial uses of the affected ASBS, including marine aquatic life and habitat, and to maintain natural water quality within ASBS. (San Mateo County 2018d)

The James V. Fitzgerald ASBS is located in the unincorporated portion of San Mateo County, approximately 7 miles north of the City of Half Moon Bay and extends from 4th Street in Montara, south to the Pillar Point breakwater. The Fitzgerald Marine Reserve is located within the boundary of the ASBS. A 5.5-mile band of shoreline including the Reserve was designated as an ASBS due to the diversity of habitat and biological assemblages, including dense stands of bull kelp found along with red algae, diverse array of invertebrates that inhabit the broad reef, and the 3 types of subtidal habitat that occur at this location. The watershed draining into the ASBS is a 4.5 square mile area of unincorporated communities consisting of Montara, Moss Beach, rural areas of Montara and Moss Beach along and north of San Vicente Creek, Seal Cove, and Pillar Point Bluff. See Figure 1 that shows the James V. Fitzgerald ASBS boundary and ASBS watershed boundary (San Mateo County 2018d). Montara Creek is within this ASBS watershed boundary.

In June 2011, San Mateo County began working on the Fitzgerald ASBS Pollution Reduction Program to comply with the Water Board's General Exception to the Ocean Plan with Special Protections. The program involves the implementation of targeted stormwater BMPs, water quality studies, and BMP effectiveness monitoring within the ASBS watershed boundary, and education and outreach. The program's goal is to improve water quality and protect the beneficial uses of the Fitzgerald ASBS and assist in the County's compliance with the ASBS stormwater regulations. (San Mateo County 2018e)



Figure 1
Fitzgerald Area of Special Biological Significance
San Mateo County GIS, 2018

In order to comply with the SWRCB's Special Protections, the San Mateo County Planning and Building Department regulates private stormwater discharges into the ASBS by enforcing the following requirements:

- Discharges may occur only during the wet weather season (October 1 through April 30) and must: 1) be composed of only stormwater, 2) be free of pollutants, and 3) must not alter natural ocean water quality in the ASBS.
- All new point source discharges into the ASBS shall either be retained on-site or shall be treated on-site prior to entering a County storm drain.
- Discharge treatment and management measures are required to be identified on project plans and implemented during construction and future maintenance.
- For properties served by private septic systems, pool and/or spa discharge shall be dechlorinated and slowly discharged to landscaped areas (determined adequate to support the volume).
- Erosion and sediment control plans are required to be submitted for review and approval for projects within the ASBS watershed that involve soil disturbance and are subject to a building or grading permit.
- Pursuant to the Water Board's General Exception to the California Ocean Plan with Special Protections (Attachment B, Section A.2.c.1), weekly construction site inspections are required for all construction sites within the ASBS watershed that involve soil disturbance and are subject to a building or grading permit (considered Stormwater Regulated Construction Sites).
- On-site areas (new or replaced) used for car washing shall drain to adequately-sized vegetative areas or other on-site treatment facilities, or occur on permeable surfaces (e.g. gravel, grass), and should use as little detergents as necessary. Phosphate free or biodegradable soap is highly encouraged. Discharge to the sanitary sewer is prohibited by the Montara Water and Sanitary Code. (San Mateo County 2018e)

Additionally, as required by the Municipal Regional Permit (MRP) and the authority given to the Clean Water Program San Mateo, development projects creating one or more acres of impervious area in non-exempt regions of the County are required to attenuate runoff associated with project implementation to be no greater than pre-project conditions. The specific goal of the HM program is to control the post-project flow to match pre-project runoff flow rates and durations ranging from 10 percent of the pre-project 2-year peak flow up to the pre-project 10-year peak flow.

As required by the MRP and the authority given to the Clean Water Program San Mateo, development projects creating one or more acres of impervious area in non-exempt regions of the County are required to attenuate runoff associated with project implementation to be no greater than pre-project conditions. The specific goal of the HM program is to control the post-project flow to match pre-project runoff flow rates and durations ranging from 10 percent of the pre-project 2-year peak flow up to the pre-project 10-year peak flow. Consistent with County requirements, the Cypress Point project is required to implement HM. The proposed project anticipates incorporating bio-retention areas in the project design as the main BMP

treatment strategy for both MRP and HM water quality discharge compliance. Stormwater attenuation will be achieved in the bio-retention areas by modifying the overflow riser structures and adding orifices to subdrain connections, thereby adding the storage and flow control necessary to meet HM.

The proposed project stormwater management facilities would be consistent with the pre-project runoff drainage pattern where stormwater is directed to one discharge location at Montara Creek. The Pre-project tributary area land usage, including run-on from adjacent properties, consists of 10 acres of pervious and 2 acres of impervious surfaces. The post-project tributary area is broken into two watersheds: one draining toward the bioretention areas and another that bypasses the bioretention areas and follows existing drainage patterns. Cumulatively the post-project land use will include 5 acres of impervious and 7 acres of pervious surfaces.

Because construction of the Cypress Point project would disturb one or more acres of soil, project proponents will be required to obtain coverage under the SWRCB's General Permit for Discharges of Storm Water Associated with Construction Activity Construction General Permit Order 2009-0009-DWQ. Construction activity subject to this permit includes clearing, grading and disturbances to the ground such as stockpiling or excavation.

In addition, prior to the initiation of grading, a project applicant is required to prepare and implement a SWPPP designed to reduce potential impacts to water quality during construction of the project. As required by regulations implementing the Construction Stormwater Permit, the SWPPP is required to include:

- Specific and detailed Best Management Practices to mitigate construction related pollutants, including sediments. These controls would include practices to minimize the contact of construction materials, equipment, and maintenance supplies (e.g., fuels, lubricant, paints, solvents, and adhesives) with stormwater. The SWPPP would specify properly designed centralized storage areas that keep these materials out of the rain and/or protected from the wind.
- Dust control BMPs for the stabilization of exposed surfaces and to minimize activities that suspend or track dust particles. For heavily traveled and disturbed areas, wet suppression (watering), chemical dust suppression, gravel or asphalt surfacing, temporary gravel construction entrances, equipment wash-out areas, and haul truck covers can be employed as dust control applications. The use of permanent or temporary vegetation and mulching, and sand fences can be employed to prevent sediment-laden stormwater from reaching receiving waters, or to force stormwater to drop their sediment load on-site.
- The SWPPP is required to specify a monitoring program to be implemented by the construction site supervisor. SWRCB personnel, who may make unannounced site inspections, are empowered to levy appropriate fines if it is determined that the SWPPP has not been properly prepared and implemented.

6.2 ENVIRONMENTAL ANALYSIS

Impact: *Would the project 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)? Would the project significantly degrade water quality?* **Less-than-significant Impact with Mitigation Incorporated.**

Potential impacts to groundwater and surface water quality could occur both during construction and operation of the proposed project. Temporary increases in the erosion of exposed soils during construction of the project could result in minor on-or-off-site water quality impacts, particularly if rainfall events occur during an active construction phase. Additionally, chemicals used in construction (fuels, lubricants, paints, coatings) could be released to the environment if spilled.

Construction of the proposed Cypress Point project would disturb a significant portion of the 10.875-acre project site. On-site soils are subject to severe water erosion hazards (NRCS 2018), and the Geotechnical Investigation report prepared for the project contains specific recommendations regarding erosion control. In addition, the proposed project would be subject to the requirements of the SWRCB Construction General Permit Order 2009-0009-DWQ and the San Mateo County ASBS requirements. All construction activities would implement stormwater pollution prevention BMPs designed to reduce potential impacts to water quality during construction of the project.

With implementation of Mitigation Measure GEO-1, which requires implementation of the erosion control measures contained in the Geotechnical Investigation report, and compliance with the requirements of the SWRCB's Construction General Permit for Stormwater Discharges and San Mateo County ASBS requirements, potential impacts resulting from contaminated construction period stormwater runoff would be reduced to a less-than-significant level. For additional information, see the Rockridge Geotechnical Investigation report.

Impact: *Would the project significantly deplete groundwater supplies or interfere 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)?* **Less-than-significant Impact.**

The project site is located primarily in the Upper Moss Beach groundwater subbasin, although a small portion of the site may overlay the Lower Montara Creek subbasin. Local recharge within the Upper Moss Beach groundwater subbasin comes primarily from storm events. Lower Montara Creek is incised to bedrock, thereby limiting aquifer recharge from this reach of the stream. Because the project site has limited development currently (historic building pads), much of the site is permeable to precipitation and stormwater run-on from adjacent properties.

With implementation of the proposed project, a seven-acre portion of the site would remain pervious, and continue to serve as groundwater recharge during storm events. As proposed, a five-acre area of the Cypress Point project site would be served by bio-retention basins. Stormwater within the basins would be retained, and a major portion of the water would be discharged into a storm drain for eventual discharge to Montara Creek. Some stormwater within the bio-retention basins would percolate to groundwater. Because the project site is not identified as an important area for groundwater recharge, and because some of the runoff from the site will be retained in bio-retention ponds that will facilitate recharge, a minor reduction in the amount of pervious area of the site would not lead to a significant impact. The impact on groundwater recharge would be less than significant.

Impact: *Would the project 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? Would the project significantly alter the existing drainage pattern of the site or area, including through alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site? Would the project create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?* **Less-than-significant Impact.**

As noted above, implementation of the Cypress Point project would not modify the natural stormwater regime of the project site and would be consistent with the requirements of San Mateo County regarding the rate and amount of stormwater discharge from impervious areas of the site. This would be a less-than-significant impact and no mitigation is required.

Impact: *Would the project result in increased impervious surfaces and associated runoff?* **Less-than-significant Impact.**

As noted above in the Geology and Soils section of this document, implementation of the Cypress Point project would create some additional impervious surfaces on the project site, but would not increase site runoff. The proposed project would be subject to the requirements of the SWRCB Construction General Permit Order 2009-0009-DWQ. All construction activities would implement stormwater pollution prevention BMPs designed to reduce potential impacts to water quality during construction of the project.

Compliance with the requirements of the Construction Stormwater Permit, including the preparation and implementation of a SWPPP, and implementation of Mitigation Measure GEO-2 would reduce impacts to water quality due to increased runoff to a less-than-significant level. Additionally, the project would be consistent with the requirements of San Mateo County regarding the rate and amount of stormwater discharge from impervious areas of the site. This would be a less-than-significant impact and no additional mitigation is required.

Impact: *Would the project 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? Would the project place within an existing 100-year flood hazard area structures which would impede or redirect flood flows? Would the project 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? **No impact.***

See above under *Hazards and Hazardous Materials*.

Impact: *Would the project expose people or structures to a significant risk of loss, injury or death involving inundation by seiche, tsunami, or mudflow? **No Impact.***

See above under *Hazards and Hazardous Materials*.

7. LAND USE AND PLANNING

7.1 ENVIRONMENTAL SETTING

MidPen proposes to develop 71 affordable housing units, an associated community building, and outdoor recreation areas on the project site. The San Mateo County General Plan Land Use Designation for the location of the proposed project is Medium-High Density Residential. This designation allows for development at densities of between 8.8 to 17.4 housing units per acre. (San Mateo County 1986)

The Zoning Designation for the project site is PUD-124/CD. This zoning designation traces back to 1986, and was assigned to a proposed Planned Unit Development (PUD) on the site called Farrallon Vista. This zoning designation allows for a total of 148 units on the site, with a density of 13.6 units per acre (San Mateo County 2018). As proposed, implementation of the Cypress Point project would result in the construction of 71 units on the project site, reducing the density to 6.5 units per acre.

To implement the proposed modification to the approved PUD, MidPen is requesting the following actions from the California Coastal Commission (Coastal Commission) and San Mateo County:

Coastal Commission

- Amendment of the Local Coastal Program (San Mateo County 2013) land use designation from Medium-High Density Residential to Medium Density Residential, and
- Approval of a planned unit development for the parcel, which requires an amendment to the adopted San Mateo County Local Coastal Program (LCP) Implementation Plan.

San Mateo County Planning and Building Department:

- Amendment of the General Plan designation from Medium-High Density Residential to Medium Density Residential,
- Adoption of a PUD amendment for the parcel,

- A Coastal Development Permit.

The site is designated as Medium-High Density Residential (RD-2) in the San Mateo County LCP, which allows for development at densities from 8.1 to 16.0 units per acre. The site is defined as infill in the LCP, and designated as a priority development site for affordable housing in the San Mateo County Local Coastal Program Policies document (San Mateo County 2013). The site is also designated as an affordable housing opportunity site under the San Mateo County Housing Element (San Mateo County 2015).

The U.S. Fish and Wildlife Service (USFWS) has issued Pacific Gas and Electric Company (PG&E) an Endangered Species Act Section 10(a)(1)(B) incidental take permit for the company's Bay Area Operations and Maintenance Habitat Conservation Plan (HCP). This HCP is designed only to cover PG&E's activities; therefore, aspects of the proposed project outside of PG&E's activities are not subject to the provisions contained within the PG&E O&M HCP. There are no other Habitat Conservation Plans or Natural Community Conservation Plans in effect on the project site.

7.2 ENVIRONMENTAL ANALYSIS

Impact: *Would the project physically divide an established community?* **No Impact.**

The proposed Cypress Point project site is an approximately 10.875-acre parcel that is currently undeveloped. The northwestern boundary of the site is adjacent to Carlos Street, with vacant land, Highway 1, and the Montara Sanitary District beyond to the west. There are four residential parcels to the north of the site, and additional very low- to low-density residential areas to the east and south. The proposed Cypress Point project would be located in an existing residential neighborhood; existing and planned surrounding land uses would continue to include residential and open space uses. Therefore, the proposed project would not physically divide an established community. No impact would occur and no mitigation is required.

Impact: *Would the project 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?* **Less-than-significant Impact.**

The approximately 10.875-acre project site is designated for medium-high density residential use by the San Mateo County General Plan, Zoning Code, Housing Element, and the Local Coastal Program. As proposed, implementation of the proposed project would result in modifications to existing land use designations. However, because the proposed project would be consistent with the project site's General Plan, Zoning Code, Housing Element, and LCP designations as amended, a less-than-significant impact would occur, and no mitigation is required.

Impact: *Would the project conflict with any applicable habitat conservation plan or natural community conservation plan?* **No Impact.**

As noted in the Biological Resources Assessment prepared by De Novo Planning Group for the Cypress Point Project, there are no approved or adopted Habitat Conservation Plans nor Natural Community Conservation Plans for the project site or its vicinity (De Novo 2020). Therefore, the project would not conflict with any such plans that would pertain to the proposed project. There would therefore be no impact and no mitigation is required.

Impact: *Would the project result in the congregating of more than 50 people on a regular basis?* **Less-than-significant Impact.**

The project site would feature a community building. However, no regular use or activity is proposed for the community building or for the project site in general that would involve the congregation of more than 50 people on a regular basis. This would be a less-than-significant impact.

Impact: *Would the project result in the introduction of activities not currently found within the community?* **No Impact.**

The range of activities on the project site would be consistent with those in the neighboring community. There would be no impact and no mitigation is required.

Impact: *Would the project serve to encourage off-site development of presently undeveloped areas or increase the development intensity of already developed areas (examples include the introduction of new or expanded public utilities, new industry, commercial facilities, or recreation activities)?* **Less-than-significant Impact.**

The proposed project is located on a parcel that is surrounded by surrounding residential uses and open space; development of undeveloped parcels adjacent to the project site is infeasible due to land slopes, closeness to Montara Creek, and issues related to access. Therefore, the proposed project would not encourage additional development in the vicinity. This would be a less-than-significant impact and no mitigation is required.

Impact: *Would the project create a significant new demand for housing?* **No Impact.**

Implementation of the proposed project would result in the development of 71 new affordable housing units, satisfying some existing housing demand. It would thus not create a significant new demand for additional housing units. There would be no impact and no mitigation is required.

8. MINERAL RESOURCES

8.1 ENVIRONMENTAL SETTING

The Cypress Point project area is not located in a zone of known mineral or aggregate resources (San Mateo County 1986). The California Surface Mining and Reclamation Act Mineral Land Classification for the area is Mineral Resource Zone-3, which is defined as “Areas containing mineral deposits the significance of which cannot be evaluated from available data.” (DOC 1996)

ENVIRONMENTAL ANALYSIS

Impact: *Would the project 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? Would the project 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?* **No Impact.**

No active mining operations are present in, or near, the project area. Implementation of the proposed project would not interfere with the extraction of any known mineral resource. Thus, no significant impacts would result.

9. POPULATION AND HOUSING

9.1 ENVIRONMENTAL SETTING

The proposed project is located on vacant parcel. No housing units exist on the parcel, and the parcel has no other existing use involving persons working on or occupying the site. The San Mateo County General Plan Land Use Designation for the location of the proposed project is Medium-High Density Residential. This designation allows for development at densities of between 8.8 to 17.4 housing units per acre. (San Mateo County 1986)

The current Zoning Designation for the location of the proposed project is PUD-124/CD. This zoning designation traces back to 1986, and was assigned to a proposed PUD on the site called Farrallon Vista. This zoning designation allows for a total of 148 units on the site, with a density of 13.6 units per acre (San Mateo County 2018). As proposed, implementation of the Cypress Point project would result in the construction of 71 units on the project site, reducing the density to 6.5 units per acre.

9.2 ENVIRONMENTAL ANALYSIS

Impact: *Would the project 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)?* **Less-than-significant Impact.**

Implementation of the proposed project would result in a decrease in the number of permitted residential dwellings on the project site. The project requests modification of the San Mateo County General Plan and Zoning Ordinance, as well as the Local Coastal Plan to decrease the intensity of use that could be constructed on the project site, though the use would remain residential. While there would be some increase in employment both during the construction phase and during project operation, the number of employees would be small in relation to the overall workforce in the county. The local labor pool could accommodate the need for additional construction employees. Implementation of the project would not result in overall increases in the capacity of any offsite public services or utilities beyond modifications and upgrades necessary to serve the proposed Cypress Point project. (For more information, see the *Public Services and Utilities Report* (Stevens Consulting 2018). Therefore, the proposed

project would not induce substantial growth in Moss Beach or other areas of San Mateo County. The impact would be less than significant.

Impact: *Would the project 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?* **Less-than-significant Impact.**

The proposed project would be situated on a parcel that is currently vacant. There are no housing units or any other developed uses on the project site. Because the site is undeveloped and has no existing housing units, there would be no displacement of housing units or substantial numbers of people; replacement housing in another location would not be required. There would be no impact.

10. RECREATION

A technical report, *Public Services and Utilities* (Stevens Consulting 2018), prepared for the project addresses many issues related to this topic. This section addresses the one topic area not addressed in that report.

10.1 ENVIRONMENTAL SETTING

The California Department of Parks and Recreation owns and operates 8,353 acres of recreational facilities in San Mateo County, in the form of parks, beaches, and marine reserves. The facilities nearest to the proposed project vicinity include Gray Whale Cove and Montara State Beaches. The County of San Mateo Department of Parks operates 22 parks that encompass over 17,000 acres. It features approximately 190 miles of county and local trails, including three regional trails. James Fitzgerald Marine Reserve and Pillar Point Bluff are the County parks nearest the proposed project site. Moss Beach Park is a playground facility located approximately one mile south of the project site. Recreation resources are more fully described in the Public Services and Utilities Report.

10.2 ENVIRONMENTAL ANALYSIS

Impact: *Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?* **Less-than-significant Impact.**

The proposed project will provide informal recreational opportunities for Cypress Point residents and the general public by providing access to an informal trail on undeveloped portions of the site. The accessible path will terminate into a trellis-covered area with barbecue equipment, picnic tables, and benches. Other outdoor areas will include a half basketball court, and a paved overlook with trellis and seating. In addition, the central outdoor space adjacent to the community building will include two play structures and open grassy terraces with flowering trees and planting. These on-site recreational facilities would meet a portion of the resident's demand for recreation. As stated in the Public Services and Utilities Report, the

County charges impact fees to all new development to mitigate a project's impacts on park and recreation facilities. These impact fees are used to address the identified future needs for the City's park system. The impact fees would reduce any impacts from this project to a less-than-significant level, so no mitigation is required.

11. TRANSPORTATION AND TRAFFIC

A technical report, *Cypress Point Traffic Impact Analysis* (Kittelton & Associates 2019) and a follow-up memo (Kittelton & Associates 2020) were prepared for the proposed project. This section addresses the topic area not addressed in those reports.

11.1 ENVIRONMENTAL SETTING

For a description of the environmental setting, please see the *Cypress Point Traffic Impact Analysis* (Kittelton & Associates 2019), and the supplemental memo (Kittelton & Associates 2020).

11.2 ENVIRONMENTAL ANALYSIS

Impact: *Would the project result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that would result in substantial safety risks?* **Less-than-significant Impact.**

The proposed project would be located approximately 0.9 mile from the northerly boundary of the Half Moon Bay Airport. According to the Half Moon Bay ALUCP, the proposed project would fall within Zone 7, Airport Influence Area, the outermost area as indicated in the ALUCP. The aircraft accident risk level in Zone 7 is considered to be low. The ALUCP provides height requirements for new development within Zone 7, allowing structures no higher than 300 feet (HMB ALUCP 2014). With a base elevation of up to 186.5 feet MSL for the building pads of the proposed housing units, and a maximum of 28 feet of height for the proposed structures, all new development on the proposed project site would be in compliance with the height limitations of the ALUCP. Implementation of the proposed project would not result in a change in air traffic patterns. This would be a less-than-significant impact, and no mitigation is required.

12. WILDFIRE

12.1 ENVIRONMENTAL SETTING

The area containing the proposed project site is within a Local Responsibility Area, not a State Responsibility Area, but State Responsibility Areas designated as High and Very High are located approximately 1 mile north and east of the project site (CALFIRE 2007).

12.2 ENVIRONMENTAL ANALYSIS

Impact: *If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:*

- a) *Substantially impair an adopted emergency response plan or emergency evacuation plan?*
- b) *Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and hereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?*
- c) *Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?*
- d) *Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?*

a). The project site is located within an urbanized area on a parcel designated for residential development, and is less than ¼ mile from a fire station. Therefore, it would not impair an adopted emergency response plan or emergency evacuation plan. **No Impact**

b). The proposed project is located on a moderately sloped parcel. Prevailing winds in the area of the proposed project are inland from the ocean towards the east. As indicated above under Hazards and Hazardous Materials, Wildland Urban Interface fires occur where combustible vegetation meets combustible structures, combining the hazards associated with wildfires and structure fires. New residential structures constructed as part of the proposed project would include fire-resistant features that conform to modern fire and building codes, as well as fire detection or extinguishing systems. These newer residential structures would not be as vulnerable to fire as are older structures. The likelihood that a major structural fire will expand into a wildland fire before it can be brought under control is therefore significantly reduced. Similarly, wildfires will be less able to burn these buildings because of the preventative measures in place. Further, due to the proximity of the project site to the Moss Beach fire station, and the very short expected response time to reported fires, the likelihood of injuries or pollutant emissions due to a wildfire is minimal (SMC 2018c). Therefore, the proposed project would not exacerbate wildfire risks or expose occupants to pollutant concentrations from a wildfire, or to the uncontrolled spread of wildfire.

c). The proposed project does not require the installation of any new roads, fuel breaks, emergency water sources, or power lines. It does require the extension of existing infrastructure from surrounding parcels to the project parcel, but this would not increase fire risks.

d). There are two single family homes downhill from the project site on 16th Street, and the Montara Water and Sanitary District and a small commercial land use are located downhill across State Route 1 from the project site. However, the proposed project would not increase the risk of wildfire or increase the severity of wildfires and would thus not expose these structures to significant risk from flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes.

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