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FINAL ENVIRONMENTAL IMPACT REPORT HALF MOON BAY HYATT PLACE PROJECT

State Clearinghouse No. 2018032059

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Prepared for

**City of Half Moon Bay
Community Development
501 Main Street
Half Moon Bay, CA 94019**



Prepared by



**1625 Clay Street
Suite 700
Oakland, CA 946012**

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VOLUME 1 – RESPONSE TO COMMENTS DOCUMENT

1.0 INTRODUCTION

The City of Half Moon Bay (City) prepared a Draft Environmental Impact Report (Draft EIR) for the Hyatt Place project (project), pursuant to the California Environmental Quality Act (CEQA) (Public Resources Code Section 21000 et seq.). The Draft EIR was released for public review on July 15, 2022, for a 60-day circulation period. During this time, paper copies of the Draft EIR were available at the City of Half Moon Bay Community Development Department office and the City of Half Moon Bay Library. The document is also available online at <https://www.half-moon-bay.ca.us/652/Project-Proposal-for-Hyatt>

One hundred and three comment letters were received by the City on the Draft EIR. This Response to Comments document responds to those written comments and provides clarification to the text in the Draft EIR as necessary.

1.1 PURPOSE OF THIS DOCUMENT

Per CEQA, the City is required to consult with public agencies with jurisdiction related to the project and provide the general public an opportunity to review and comment on the Draft EIR. As the lead agency, the City is also required to address comments received during circulation that raise issues with the environmental analysis.

This document includes responses to 90 comment letters submitted during the 60-day public review period from July 15, 2022, to September 13, 2022. This document also describes appropriate changes, additions, clarifications, or correction to the information presented in the Draft EIR. Responses and

revisions in this document are intended to substantiate and confirm or clarify analyses presented in the Draft EIR.

This document does not raise new significant environmental impacts. No substantial increase in the severity of an earlier identified impact has resulted from responding to comments.

Comments that express opinions about the merits of the project or project alternatives, project economics, or aspects of project design that do not have the potential to result in physical effects on the environment are not comments on the adequacy or content of the environmental analysis in the EIR; therefore, no response is required in this document. These comments are noted, and are part of the administrative record, and will be provided to the decisionmakers and considered during the project approval process.

As described in greater detail later in this chapter, the following terms will be used throughout this document and defined as follows:

- “Original Project” refers to the project as described in the Draft EIR;
- “Alternative 2” refers to one of the alternatives originally analyzed in the Draft EIR;
- “Modified Alternative 2” and “Proposed Project” refers to Alternative 2 with modifications. This is now the Proposed Project that will be considered for approval; and
- “Project” is used generically – not pertaining specifically to either the Original Project or Modified Alternative 2 (the Proposed Project).

Together, the Draft EIR and this Response to Comments document constitute the Final EIR for the project. Accordingly, the Final EIR is provided for consideration and certification by the City.

1.2 PROJECT OVERVIEW

The Original Project described in the Draft EIR is a proposed hotel with up to 129 guest rooms and ancillary features on a 5-acre project site in the city. The Draft EIR analyzed the implementation of the Original Project, as well as three project alternatives: No Project, Alternative 1; Reduced Intensity, Alternative 2; and Multi-Family Residential, Alternative 3. Following circulation of the Draft EIR, the applicant submitted revised plans to the City indicating that Alternative 2 (with revisions), is now the Proposed Project that would be considered for approval. This Proposed Project is described in the Final EIR as Modified Alternative 2. See Section 1.3, Revision to Alternative 2, for further description of how Modified Alternative 2 differs from Alternative 2 as described in the Draft EIR. See Section 1.5, Summary Comparison, for

further description of how Modified Alternative 2 (the Proposed Project) differs from the Original Project.

The project site is zoned Planned Unit Development (PUD)/Commercial, and the General Plan land use designation is Commercial – General. However, the Half Moon Bay Local Coastal Land Use Plan (LCLUP) update indicates that the site is proposed to be rezoned to Commercial – General (CG) as part of the future implementation of the LCLUP. The CG zoning standards are used as an appropriate guide for this site because they are consistent with the LCLUP land use designation and can also be accommodated by the PUD zoning.

Surrounding zoning includes General Commercial to the north (C-G; auto dealership) followed by two-family residential (R-2), PUD and Public Service (P-S; fire district facilities) to the east, open space, and PUD to the south and west, and single-family residential (R-1 B-1) to the northwest.

The Original Project includes the construction of a 90,784 square-foot hotel, with varying heights of up to 35 feet. The hotel would include up to 129 guest rooms and supporting facilities such as a board room, lobby and lounge area, swimming pool, fitness area, and a meeting room/multipurpose room. Up to 148 parking spaces would be provided, with at least 129 parking spaces dedicated for hotel guests and additional parking spaces for employee use.

As described in Section 3.3, Project Objectives in the Draft EIR, the City's primary project objectives for the Original Project are as follows:

- Implement the California Coastal Act, including protecting coastal resources such as wetlands and providing coastal zone priority uses such as restaurants and accommodations geared towards visitors, especially lower cost coastal access provisions including lower cost accommodations on or off-site and/or public access and recreation benefits such as airport shuttles, bicycle rentals, or trail connections. Conform with the Local Coastal Program, including promotion of bicycle and pedestrian trails, such as along SR-1 and the Downtown area.
- Enhance Half Moon Bay's southern Downtown gateway to the City by:
 - Providing connectivity to local trails and the downtown core
 - Supporting the City's plans to highlight access to Main Street, Historic Downtown, and the commercial core
 - Providing a development that is aesthetically pleasing by balancing the urban landscape with natural elements of the coast
 - Integrating the artisanal culture of the City into the design theme of the development and the project site

- Enhancing access to and patronage of the adjacent theater
- Be designed as contextually appropriate for the City of Half Moon Bay and provide compatibility with both the Downtown and the adjacent residential neighborhood with building massing reflective of the City's traditional development and scale and providing maintenance of adequate views.
- Be designed to be compatible with and enhance the aesthetic of the south entry to the city.
- Be served by existing public infrastructure including water supply, sewer, and roadway capacity and through on-site provision of green infrastructure for storm water management.
- Support Downtown vitality, central core focus and the City's economic development goals.
- Meet the demand for branded and reasonably affordable hotel rooms to support Half Moon Bay's growing local tourist and agribusiness economies.
- Establish a higher level of use on an underused parcel in the City's downtown core area.
- Support the local job market by providing new employment opportunities.
- Provide an opportunity for the City to increase revenue stream.

The project applicant's objectives for the project are as follows:

- Develop a mid-range hotel to fill a gap in the market.
- Provide a conference and wedding venue primarily for hotel guests.
- Provide service sector employment opportunities for Half Moon Bay residents.
- Provide public recreational opportunities through a multi-use bicycle and pedestrian path, which will become part of the City's circulation plan.
- Provide shuttle transportation for hotel guests to beaches, harbor points of interest and downtown areas.
- Create a destination at the southern end of Main Street which will indirectly support the existing retail, hospitality, restaurants, and entertainment venues in the downtown area.
- Encourage pedestrian use of the southern portion of Main Street by providing infrastructure improvements including installing a curb, gutters, sidewalk, and landscaping between Seymour Street and the SR-1/Main Street intersection.

While housing, and specifically affordable housing, are City priorities, this site has been designated for commercial land use for many years through the previous L.C. Smith Estate Planned Development designation and associated

PUD (Planned Unit Development) zoning. The updated LCLUP continued the intent-of the former Planned Development designation by redesignating the site for the Commercial-General Land Use. While that designation allows for residential and/or mixed-use development, the site's location and orientation serve as the southern commercial gateway to Downtown Half Moon Bay. The City also recently lost a hotel, when the 52-room Coastside Inn was purchased by San Mateo County and converted to a homeless shelter; and thus, the continued land use focus for this property has been to maintain adequate visitor serving commercial uses that align with the California Coastal Act (Government Code Section 51201(c)). The California Coastal Act prioritizes coastal access and recreation, and the project includes amenities such as bicycle rentals to support coastal access and recreation in Half Moon Bay as well as on-site pedestrian pathways where none currently exist.

Implementation of the project would not result in any land use inconsistencies with the Half Moon Bay LCLUP or Zoning Code, because the proposed hotel is consistent with the LCLUP land use designation and its intended rezoning to the Commercial-General district.

Under CEQA, a significant impact on the environment is defined as “a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by a project including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance.”

Based on the analysis completed for the Draft EIR, the Original Project would result in impacts in several resource areas that would be considered significant without the implementation of mitigation measures. However, each of these impacts would be avoided or reduced to a less-than-significant level with the implementation of mitigation measures or standard conditions of approval, except for impacts to aesthetic resources, including impacts to scenic vistas, scenic resources, and to the overall visual character of the area. These impacts to aesthetics resources are considered significant and unavoidable and are described further in Section 2.2.3, Significant and Unavoidable Impacts, of the Draft EIR.

In accordance with CEQA Guidelines Section 15126.6, the Draft EIR compares the impacts of the alternatives to the impacts of the Original Project (Chapter 5.0, Alternatives Analysis of the Draft EIR). The primary purpose of Chapter 5.0 is to provide decision makers and the public with a range of reasonable project alternatives that could feasibly attain most of the basic project objectives while avoiding or substantially lessening any of the Original Project's significant adverse environmental effects. Under Alternative 1, the project site would remain in its current state and there would be no

development of a hotel or bike path. The existing undeveloped field on the site would remain as is. Modified Alternative 2, includes a smaller hotel than the Original Project with fewer rooms and a residential component. The Multi-family Residential Alternative, Alternative 3, would involve the construction of residential units at the project site rather than a hotel. Please see Chapter 5.0, Alternatives Analysis, in¹ for full descriptions of each Alternative².

1.3 REVISION TO ALTERNATIVE 2

Following circulation of the Draft EIR, the applicant submitted revised plans to the City indicating that Alternative 2 (with revisions) is now the Proposed Project that would be considered for approval. This Proposed Project is described in the Final EIR as “Modified Alternative 2” and it is the Reduced Intensity alternative. Modified Alternative 2 would meet the same objectives met by the Original Project. In some cases, Modified Alternative 2 would achieve the City’s primary project objectives to a greater degree than the Original Project that was analyzed in the Draft EIR. This is further described in Chapter 3.0, EIR Text Revisions, of this Final EIR.

The main differences between Alternative 2 and Modified Alternative 2 (the Proposed Project) are as follows:

Modified Alternative 2 would reduce the hotel square footage from 66,783 in the Alternative 2 to 66,268 square feet.

Modified Alternative 2 would include a four-lot parcel map allowing for future development of up to 16 units on four lots (Lots 1-4), compared to eight smaller lots in Alternative 2. Further, Lots 1-4 as proposed under Modified Alternative 2 are set further back (50 feet) from SR-1, in contrast to the lots proposed in Alternative 2.

Modified Alternative 2 would increase the space between the two hotel buildings from 16 feet in Alternative 2 to 32 feet. To accommodate this additional spacing, the lot line adjustment between the hotel and automobile dealership parcels would add 0.451 acres to the dealership compared to 0.61 acres in Alternative 2, which would create a 4.57- acre hotel site compared to 4.41 acres in Alternative 2.

² Please see the text revisions to Draft EIR Chapter 5.0, Alternatives, in Chapter 3.0, EIR Text Revisions, of this Final EIR for a detailed description of Modified Alternative 2.

For Modified Alternative 2, minor adjustments as presented for Alternative 2 to the parking lot layout and drive aisles were made to better accommodate service vehicles.

Alternative 2 would have resulted in a new parcel fully within the 50-foot buffer for wetlands buffer for a designated Environmentally Sensitive Habitat Area (ESHA). By comparison, Modified Alternative 2 conforms with LCLUP Policy 6-57 because all proposed parcels can be developed without encroachment into an ESHA or being located within the 50-foot ESHA buffer.

In comparison to Alternative 2, Modified Alternative 2 provides a detailed proposal for how the Proposed Project will address mitigation for the conversion of agricultural land through payment of in-lieu fees in accordance with the Half Moon Bay LCLUP.

In comparison to Alternative 2, Modified Alternative 2 provides a detailed proposal for how the Proposed Project will address the provision of lower-cost visitor accommodations with a combination of lower-cost rooms and no-cost visitor-serving amenities available to the public in accordance with the Half Moon Bay LCLUP.

As described above, Modified Alternative 2 would reduce impacts, better meet project objectives, and improve consistency with policy requirements, as compared to the Alternative 2. Refer to Appendix 3.0-A, Attachment to EIR Text Revisions, of this Final EIR, for a full description of Modified Alternative 2.

1.4 MODIFIED ALTERNATIVE 2

Both qualitative and quantitative analyses were completed for Alternative 2. As part of the Final EIR, the analysis for Alternative 2 was updated to reflect the analysis for Modified Alternative 2 and is documented as EIR text revisions. Please see Appendix 3.0-A, Attachment to EIR text Revisions, specifically Section 5.5.2, Reduced Intensity, Modified Alternative 2 for the detailed analysis of the Proposed Project. Based on this analysis, the resource analyses would be the same as those previously presented for Draft EIR Alternative 2, with the exception of the aesthetic resources impact analysis. Modified Alternative 2 would have reduced aesthetics impacts compared to Alternative 2 and as compared to the Original Project, as described below.

Aesthetics

Figures 5-8 through 5-11 have been updated to reflect the design of Modified Alternative 2, specifically the reduction of the overall massing of the Original Project and increase in building setbacks from SR-1 and Main Street. The decrease in size and scale of the buildings would reduce view blockage compared to both the Original Project and Alternative 2.

The view from the southern Downtown gateway intersection of SR-1 and Higgins Canyon Road (Viewpoint 2) provides a view of an open field, and of the protected ridgeline view. The ridgeline represents both a scenic vista and a scenic resource, per the LCLUP. As shown in **Figure 5-9 (Appendix 3.0-A of the Final EIR)** Modified Alternative 2 would not interfere with the long-range views of the ridgeline for Viewpoint 2 (same as the Original Project).

Previous analysis presented in the Draft EIR indicated that it may have been possible that Alternative 2 would interfere with a ridgeline view from areas adjacent to Viewpoint 2. Further consideration indicates that, given the speed of vehicles traveling on SR-1, such an interference would be fleeting. Further, the reduced massing proposed with Modified Alternative 2 would not block as much of this view as the Original Project.

The analysis has been updated to explain that Modified Alternative 2 would reduce the size and scale of the hotel, reducing significant impacts to aesthetic resources as compared to the Original Project. The reduced building massing would be more reflective of traditional development and scale within the city and would help to maintain adequate views of the surrounding landscape, and lessen views blocked by the Original Project. The reduced massing, combined with the increased setbacks, open space, and natural landscaping proposed under Modified Alternative 2, would enhance the aesthetics of the City's southern Downtown gateway. The Viewpoint 2 photo simulation (Figure 5-9) demonstrates that Modified Alternative 2 will not introduce such interferences with the ridgeline view.

As shown in Appendix 3.0-A, Attachment to EIR text Revisions, of this Final EIR, Modified Alternative 2 is identified as the environmentally superior alternative because it would reduce significant impacts of the Original Project as identified in the Draft EIR, and would better align with both the City's and project applicant's primary project objectives, goals, and policies.

Given the above and as demonstrated in Appendix 3.0-A, Attachment to EIR text Revisions, of this Final EIR, the alterations made to Modified Alternative 2 would not result any new impacts or substantial increase in the severity of impacts that were not previously identified in the Draft EIR. Further, Modified

Alternative 2 is not substantially different from Alternative 2, which was previously analyzed in the Draft EIR, because the changes are limited to reduced square footage, a slightly longer breezeway between buildings, an adjusted parcel map for the proposed subdivision north of Seymour Street, and improved approaches to policy consistency with the Half Moon Bay LCLUP. These changes do not constitute “significant new information,” which would require recirculation of the Draft EIR. “Significant new information” is defined in Section 15088.5(a) of the State CEQA Guidelines as follows.

- A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.
- A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.
- A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the environmental impacts of the project, but the project’s proponents decline to adopt it.
- The DEIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.

None of these circumstances defined in State CEQA Guidelines Section 15088.5(a) apply. In response to comments received during public review, minor revisions and clarifications have been made to the document which do not change the conclusions of the Draft EIR regarding the project’s potential environmental impacts and required mitigation. Revisions and clarifications have also been made to identify the changes to Alternative 2 that have resulted in Modified Alternative 2, which is now the Proposed Project. As defined in CEQA Guidelines Section 15088.5, minor revisions and clarifications to the document – which are shown in strikeout/underline format – do not represent “significant new information” and, therefore, recirculation of the Draft EIR is not warranted. No new significant environmental impacts would occur from these modifications, and similarly, no substantial increase in the severity of environmental impacts would occur.

In the one impact area where significant and unavoidable impacts exist, Modified Alternative 2 would reduce the severity of the impact. In contrast to the Original Project, Modified Alternative 2 has a less-than-significant impact to protected scenic vistas and scenic resources within a scenic corridor that are available from Viewpoints 3, unlike the Original Project, which would have a significant and unavoidable impact at this viewpoint; therefore, the impacts are reduced (not increased), and recirculation of the Draft EIR is not required.

1.5 SUMMARY COMPARISON OF THE ORIGINAL PROJECT AND MODIFIED ALTERNATIVE 2

The following table summarizes the key differences between the Original Project and Modified Alternative 2.

Table 1-1: Key Project Features

Project Component	Original Project	Modified Alternative 2
Hotel size, description	90,784 square feet 129 rooms Five buildings Max building height: Three stories and 35 feet	66,268 square feet 102 rooms Three buildings Max building height: Three stories and 35 feet
Hotel features	148 parking spaces Bicycle rentals Lobby and guest services 2,700 square feet of meeting rooms/conference center space Fitness area Swimming pool	108 parking spaces Bicycle rentals Lobby and guest services 1,210 square feet of meeting rooms/conference center space
Building frontage	60% of the length of the project site	53% of the length of the project site
Residential uses	None	Up to 16 units on 1.15 acres on Seymour Street
Setbacks from sensitive resources	100' wetland buffer on hotel site	100' wetland buffer on hotel site 50' wetland buffer on residential site
Summary of Significant and Unavoidable Impacts	Degrade existing visual character Impacts to scenic vista Impacts to scenic resources	Degrade existing visual character
Open space	39% of the hotel site	44% of the hotel site

1.6 ELEMENTS OF THE FINAL EIR

CEQA Guidelines Section 15132 require a Final EIR to consist of the following elements:

- a) The Draft EIR or a revision of the Draft EIR.
- b) Comments and recommendations received on the Draft EIR either verbatim or in summary.
- c) A list of persons, organizations, and public agencies that commented on the Draft EIR.
- d) The responses of the lead agency to significant environmental points raised in the review and consultation process.
- e) Any other information added by the lead agency.

The following components of this Response to Comments document, in combination with the Draft EIR, constitute the Final EIR for the project:

- Chapter 1.0, Introduction. This chapter presents the purpose of this document, provides an overview of the Original Project and Modified Alternative 2 (the Proposed Project), and describes the elements of the Final EIR.
- Chapter 2.0, Response to Comments. This chapter contains copies of the written comments received on the Draft EIR, “Topical Responses” that have been prepared to address common issues or themes identified in a number of the written comments, and individual responses to the comments.
- Chapter 3.0, EIR Text Revisions. This chapter contains text changes to the Draft EIR that reflect additions, corrections, and clarifications resulting from preparing responses to comments on the Draft EIR and/or staff-initiated changes. Draft EIR Section 5.5.2 that fully describes Modified Alternative 2, is included as Appendix 3.0-A to this chapter. These EIR text revisions are incorporated into the Draft EIR as part of the Final EIR.

Chapter 4.0, Mitigation Monitoring and Reporting Program. Pursuant to CEQA Guidelines Section 15097, this chapter contains the Mitigation Monitoring and Reporting Program (MMRP) for the project. The MMRP includes all proposed mitigation measures, the party responsible for implementation, the party responsible for monitoring, the timing of the mitigation, and the monitoring action to ensure compliance.

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2.0 RESPONSE TO COMMENTS

2.1 INTRODUCTION

This chapter lists the agencies, organizations and individuals who submitted comments on the Draft Environmental Impact Report (Draft EIR), provides copies of the comments received, and responds to those comments. As required by the California Environmental Quality Act (CEQA), these responses address comments on environmental issues submitted during the review period on the Draft EIR and the disposition of significant environmental issues raised (CEQA Guidelines Sections 15088.5(c), PRC 21091(d)(2)(B)). The City of Half Moon Bay (City) has addressed commenters' concerns and suggestions regarding the adequacy and accuracy of the Draft EIR as well as providing responses to all comments raising significant environmental issues prior to consideration of the Final EIR for certification (CEQA Guidelines Sections 15088.5(a) and (c), 15132(d), 15204(a)).

The purposes of reviewing a Draft EIR should be focused on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant environmental effects of the project might be avoided or mitigated (CEQA Guidelines Section 15204(a)). For this document, the following conventions are used where the text of the Draft EIR has been revised in response to a comment or concern: text added to the Draft EIR is shown in underline, and text deleted from the Draft EIR is shown in ~~strike through~~. These text changes also appear in Chapter 3.0, EIR Text Revisions.

In some cases, multiple comments were received on the Draft EIR that raised the same issue. Rather than repeat responses to such comments, this Chapter provides comprehensive Topical Responses in Subsection 2.3.1, Topical Responses. Individual responses to comments are provided in Subsection 2.3.2, Public Comments.

As described in Chapter 1.0, following circulation of the Draft EIR, the applicant submitted revised plans to the City indicating that Alternative 2 (with revisions), is now the Proposed Project that would be considered for approval. This Proposed Project is described in the Final EIR as "Modified Alternative 2".

This chapter, responds to comments on the Draft EIR, including comments on the Original Project as analyzed in the Draft EIR. In addition, and where appropriate, the responses also discuss Modified Alternative 2 to help with the understanding of how Modified Alternative 2 reduces the intensity of the Original Project.

For the purposes of this Final EIR, the following terms will be used and defined as follows:

- “Original Project” refers to the project as described in the Draft EIR;
- “Alternative 2” refers to one of the alternatives originally analyzed in the Draft EIR;
- “Modified Alternative 2” and “Proposed Project” refers to Alternative 2 with modifications. This is now the Proposed Project that will be considered for approval; and
- “Project” is used generically – not pertaining specifically to either the Original Project or Modified Alternative 2 (the Proposed Project).

2.2 LIST OF COMMENTERS

The City received 90 comment letters on the Draft EIR. **Table 2-1** lists the public agencies, businesses, individuals, and public meeting attendees that provided a comment on the Draft EIR.

Table 2-1 Index of Comments

Number	Commenter	Date Received
Agencies		
A-1	California Department of Transportation	9/06/2022
A-2	California Coastal Commission	9/09/2022
A-3	Midpeninsula Regional Open Space District	9/12/2022
Businesses and Organizations		
B-1	The Paper Crane	9/13/2022
Individuals		
C-1	Melvin Mello Jr.	9/13/2022
C-2	Ken King	8/02/2022
C-3	Virginia M Turezyn	7/30/2022
C-4	Roberta Gelt	7/29/2022
C-5	Michael W. Adler	7/29/2022
C-6	Marita Leth	7/28/2022
C-7	Diana Roberts Mitchell	7/28/2022

Number	Commenter	Date Received
C-8	Rick Southern	7/26/2022
C-9	Dave Schorr	7/27/2022
C-10	David Schorr	7/26/2022
C-11	Laura Alster-Martin	8/17/2022
C-12	Patricia Chimienti	8/17/2022
C-13	Graham Hurrell	8/17/2022
C-14	Rita Pickering	8/16/2022
C-15	Sara Nebeling	8/16/2022
C-16	T.J. Martin	8/16/2022
C-17	Patricia Chimienti	8/15/2022
C-18	Nancy Rapp	8/14/2022
C-19	Elizabeth Haning	8/14/2022
C-20	Carol Spear	8/14/2022
C-21	Robert Sweetow	8/12/2022
C-22	C.A. Young	8/11/2022
C-23	Carlyle Ann Young	8/10/2022
C-24	Denise Rundle	8/23/2022
C-25	Dave Schorr	8/22/2022
C-26	Larry Hebb	8/21/2022
C-27	Hiroshi Menjo	8/18/2022
C-28	Matt Davis	8/18/2022
C-29	Melissa Lamb	8/18/2022
C-30	Laura Fine	8/18/2022
C-31	Paul Mc Gregor	9/13/2022
C-32	Connie Alice Hungate	9/13/2022
C-33	Larry Gandelman	9/13/2022
C-34	Irma Morawietz	9/13/2022

Number	Commenter	Date Received
C-35	T Mendez	9/13/2022
C-36	Barry Franklin	9/13/2022
C-37	Jennifer Lee Segale	9/13/2022
C-38	Debbie Daugherty	9/13/2022
C-39	Laura Dunston	9/13/2022
C-40	Margaret, Robert, and Amber Stow	9/13/2022
C-41	Kathena Evelon	9/13/2022
C-42	Katheryn Murdock	9/13/2022
C-43	Melissa L.	9/12/2022
C-44	Jill and Wayne Impink	9/12/2022
C-45	Laurie Dunston	9/12/2022
C-46	Scott Forest	9/12/2022
C-47	Sean Win-Yopez	9/12/2022
C-48	Randy Kearns	9/12/2022
C-49	Jeff Corbett	9/12/2022
C-50	Rita Pickering	9/12/2022
C-51	George Muteff	9/11/2022
C-52	Michael Minasi	9/10/2022
C-53	Jay	9/09/2022
C-54	Jan Gray	9/09/2022
C-55	Jack King	9/09/2022
C-56	Terry Andreotti	9/08/2022
C-57	Tom Carey	9/08/2022
C-58	Tim Norris-Buzzini	9/08/2022
C-59	Kim Cabassi	9/08/2022
C-60	Barbara LaVey	9/07/2022
C-61	Carol Carolan	9/07/2022

Number	Commenter	Date Received
C-62	Ingrid Lee	no date
C-63	Mimi and David Pasternak	9/06/2022
C-64	Nichole Metz	9/03/2022
C-65	Jim and Teri Mercurio	9/03/2022
C-66	Denise Rundle	8/30/2022
C-67	Rocquelle Spencer	8/27/2022
C-68	Suzanne Bergin	8/25/2022
C-69	Mimi and David Pasternak	8/08/2022
C-70	David Schorr	no date
C-71	Brian Holt	8/09/2022
C-72	Dennis Kleinbach	8/09/2022
C-73	Mimi and David Pasternak	8/09/2022
C-74	David Schorr	8/22/2022
C-75	Rick Southern	8/08/2022
C-76	David Schorr	8/08/2022
C-77	Robert Moody	9/01/2022
C-78	Beverley Ashcraft	8/26/2022
C-79	Donna Dexter	9/06/2022
C-80	Susan Morasci	9/06/2022
C-81	Hazel Joanes	9/13/2022
C-82	Chad Pometta	9/13/2022
C-83	David Schorr	9/13/2022
City		
D-1	Margaret Gossett	9/13/2022
Public Meeting		
E-1	Main Street Park	8/31/2022
E-2	Half Moon Bay Planning Commission	8/09/2022

Source: Circlepoint, 2024

2.3 RESPONSES TO COMMENTS

An alpha-numeric indicator was assigned to each comment letter. The alpha indicator describes the commenter's affiliation (i.e., A = regional agency, B = organization, C = individual, D = city, and E = public meeting) and the numeric indicator reflects the order in which the comment letter is addressed. Each individual comment (within a comment letter) is numbered to correspond to the alpha-numeric indicator (i.e., A-1.1, A-1.2, A-1.3, etc.). Accordingly, each response within this chapter corresponds to comment letter's alpha-numeric indicator. For example, Letter A-1, Comment A-1.1 is addressed in response A-1.1.

2.3.1 TOPICAL RESPONSES

Topical Response 1: Traffic

Several comments concern traffic impacts associated with construction and operation of the project. This topical response clarifies conclusions of the Draft EIR, and addresses comments related to the existing conditions scenario, and vehicle miles traveled (VMT) and trip generation concerns.

Existing Conditions Scenario

Several commenters stated that the traffic analysis did not account for weekend peak period conditions or for traffic conditions during events or holidays. The discussion below clarifies the assumptions and conditions relied upon for the Existing Conditions scenario used in the analysis to evaluate project impacts.

As discussed in Section 4.15 (page 4.15-6 of the Draft EIR), existing traffic patterns in the project area were determined and analyzed in the Traffic Impact Study (TIS) prepared for the Original Project (see Appendix H of the Draft EIR). As described in Appendix H, Existing Conditions (page 16 of the Draft EIR), the Existing Conditions scenario provides a description of current operation based on existing traffic volumes during the weekday a.m. and p.m. peak periods as well as weekend midday peak period. Traffic volume data representative of the typical weekday was collected on May 8, 2019, while local schools were in session. Because special events of varying sizes typically occur every Saturday, counts for the weekend period were conducted during two Saturdays, May 11, 2019, and June 1, 2019, and the higher of the two was applied in the analysis. The weekday and weekend counts represent typical conditions because they were conducted on days with clear weather and reflect typical local, regional and visitor travel activity. As explained in Section 4.15, Transportation and Traffic (page 4.15-6 of the Draft EIR), the traffic impact analysis used pre-pandemic data as the existing conditions baseline because it is considered more representative of typical traffic conditions than traffic conditions during the pandemic, which would have been

uninformative for purposes of analyzing the impacts of the Original Project, as described in Draft EIR Chapter 3.0, Project Description.

Standard professional practice for traffic studies should reflect typical conditions experienced by most users on most days. Therefore, conducting a study during varying traffic conditions (such as during inclement weather, holidays, or unusually large events) should be avoided because it is not representative of typical conditions since these events are temporary and periodic. It is explained that special events occur on a regular basis in Half Moon Bay and surrounding areas, including special events held on May 11, 2019, and June 1, 2019 (the days when weekend period traffic counting was conducted for this study). All traffic counts used in this study were compared to other available data sources in terms of consistency and peaking characteristics and found to be similar, thereby validating the Draft EIR.

Trip Generation and Vehicle Miles Traveled

Trip Generation During Construction and Operation

The amount of traffic predicted to enter and exit the site of a project is referred to as the project's trip generation. Several commenters stated that trip generation during construction period and operation of the project would significantly impact or exacerbate existing traffic conditions.

Construction

Construction at the project site would be temporary and would be conducted in a single phase (Chapter 3.0, Project Description). Prior to the start of construction activities, the contractor will prepare and formally submit a detailed construction management plan for City approval. The construction management plan will indicate the days and times of construction, the duration of the construction activity, where workers will park, truck haul routes, the number and type of trucks that will access the site during each construction activity, and other details. The City will require that adequate access for all transportation modes, specifically emergency vehicles, be maintained during construction. Therefore, the existing traffic network would not be significantly affected during construction.

Operation

As described in Section 4.15, Transportation and Traffic, of the Draft EIR, three categories of trips were used to evaluate Original Project-generated VMT (employee trips, guest trips to and from the airport, and local guest trips). Local guest trips refer to the trips a guest would make once they have arrived at the hotel. The average local guest trip was determined to be four miles once they have arrived at the hotel. The number of local guest trips was estimated based on the number of round trips for 129 rooms with an average occupancy of 77 percent and an average of 2.5 days per stay.

Guest trips to and from the airport were determined using the average distance traveled between the project site and the two nearest commercial airports (San Francisco International Airport and Norman Y. Mineta San Jose International Airport). For the purposes of this analysis, the 29 mile per guest estimate is reasonable, because guests would travel to and from the airport by a variety of modes including carpooling, driving alone, rideshare service, taxicab service, and/or shuttle, some of which would reduce the per person VMT due to the consolidation of vehicles used.

As explained in the Draft EIR, the project applicant intends to hire staff comprised mostly of City residents. Doing so would potentially reduce trip generation estimates because a portion of the staff would be able to walk or bicycle to and from the hotel. The project applicant cannot ensure that only City residents would be hired, however, and to provide a conservative approach the standard trip generation rates were applied with no trip reduction factor for employees within walking or biking distance.

The project's operating conditions during the weekday a.m. (7:00 – 9:00 a.m.), p.m. (4:00 – 6:00 p.m.), and Saturday midday (12:00 p.m. – 2:00 p.m.) peak periods were evaluated to capture the highest potential impacts for the project as well as the highest volumes on the local transportation network. The morning peak (a.m. peak) hour reflects conditions during the home-to-work commute as well as the school morning drop-off period; the evening peak (p.m. peak) hour typically reflects the highest level of congestion during the homeward bound commute; and the Saturday midday peak represents the period of highest volumes occurring on a weekend attributable to recreational or leisure trips. See Table 4.15-8 of the Draft EIR for the total trip distribution assumptions for the Original Project.

Vehicles Miles Traveled

Several commenters also stated that implementation of the Original Project would lead to increased VMT.

The City of Half Moon Bay has not yet adopted a standard of significance for evaluating VMT. Therefore, the analysis in the Draft EIR was informed by guidance provided by the California Governor's Office of Planning and Research (OPR), in the publication Transportation Impacts (SB 743) CEQA Guidelines Update and Technical Advisory, 2018 (OPR Technical Advisory). The OPR Technical Advisory includes suggested VMT significance thresholds for residential, employment, and retail uses, but does not address hotels or other visitor-based land uses. For the purposes of this analysis, and consistent with the guidance in the OPR Technical Advisory, a project (including the implementation of Transportation Demand Management (TDM) measures), that generates at least 15 percent less VMT than the Original Project's unmitigated VMT, would have a less-than-significant impact.

As stated in Appendix H, Traffic Impact Assessment of the Draft EIR, the TDM measures will be applied during construction and operation of the Original Project to reduce single-

occupancy vehicle trips, parking demand, and total VMT through use of alternative modes of transportation and more efficiently planned trips. The TDM measure for guests includes Airport/Coastal Shuttle implementation, parking price incentive, bike sharing program, transportation information. Additional TDM measures would be applied for employee programs, including bicycle parking, parking pricing and cash-out, ride matching, priority parking, guaranteed ride home programs, transportation coordinator, and performance monitors. See Table 4.15-5 of the Draft EIR for the unmitigated VMT summary for the Original Project.

As shown in Table 4.15-6 of the Draft EIR, overall hotel VMT is expected to be reduced by 15.4 percent using the set of the TDM strategies. Mitigation Measure TRA-1 would be implemented to ensure adherence to the TDM measures. Furthermore, the designated hotel Transportation Coordinator shall provide a copy of the TDM to the City Manager and Traffic Engineer annually.

As shown in Table 4.15-7 of the Draft EIR, the Original Project is expected to generate an average of 575 new trips per day, including 44 trips during the a.m. peak period, 46 during the p.m. peak period, and 93 during the weekend peak period. The associated VMT from this increase in traffic would be approximately 5,002 VMT prior to mitigation. With implementation of the TDM¹ as part of the Original Project, VMT would be reduced by 15.4 percent, meeting the OPR Technical Advisory's threshold for a less than significant impact.

In conclusion and as stated in the Draft EIR, VMT levels would be reduced by 15.4 percent through adherence to the TDM measures. Therefore, implementation of the Original Project would not result in a substantial increase in VMT.

Topical Response 2: Aesthetics

Several comments concern the Original Project's aesthetic impacts. This topical response addresses aesthetic impacts both broadly in terms of context and specifically in response to comments received. The response includes the following sections:

- Protected Visual Resources
- Consistency with the Local Coastal Program and Municipal Code
- CEQA Thresholds
- Special Considerations: Southern Gateway to Downtown and Wavecrest

Each area of concern is addressed in this topical response.

¹ Transportation Demand Management (TDM) program is a set of strategies intended to help address the transportation-related impacts of new development by requiring projects to provide features and amenities that will foster a better pedestrian/bicycle environment, support transit, and make it easier and more appealing for residents, employees, and visitors to use alternatives to driving or driving alone. See Section 4.15, Page 4.15-28 of the Draft EIR for more information on TDM.

Following the circulation of the Draft EIR, the applicant submitted revised plans containing modifications to Alternative 2. Alternative 2 has accordingly been renamed “Modified Alternative 2” in this Final EIR. Modified Alternative 2 is now the project under consideration for approval. Modified Alternative 2 is referenced in this topical response. For more information about Modified Alternative 2, see also Topical Response 5 (Modified Alternative 2) and the text revisions in Appendix 3.0-A, Attachment to EIR Text Revisions, of this Final EIR.

Protected Visual Resources:

As described in Section 4.1 (page 4.1-22 of the Draft EIR), Aesthetics, Original Project buildout has the potential to impact protected visual resources, including long-range views of upland slopes and ridgelines to the north and east of the project site (Impact AES-1).

The Local Coastal Land Use Plan (pages 9-15 and 9-16 of the Draft EIR) identifies both scenic and visual resource areas which, for the project site, are the “Town Boulevard Corridor” and “upland slopes.” The Town Boulevard Corridor includes SR-1, which abuts the project site. Upland slopes are located east of the project site. The Original Project’s potential impact on aesthetics has been evaluated with respect to the Town Boulevard Corridor and upland slope protection requirements of the Local Coastal Program as discussed in the next section, “Consistency with the Local Coastal Program and Municipal Code.”

Other visual resource areas designated in the Local Coastal Land Use Plan do not apply to the project site for the reasons below:

- Scenic Coastal Access Routes: The site is not on a designated coastal access route.
- Broad Ocean Views: Ocean views are not available from the project site and development of the site will not block any broad ocean views. It is notable that in other locations along SR-1, broad ocean views are available and subject to policies aimed at preserving the visual quality and public enjoyment of these vistas.
- California Coastal Trail: The Coastal Trail is located more than one-half mile west of the project site.
- Beaches and Shoreline: The site is on the east side of SR-1 and not adjacent to the beach or shoreline.
- Significant Plant Communities. The site does not contain significant plant communities as described in this section. Wetlands adjacent to the site in the SR-1 right-of-way will be retained and a wetland buffer will be established and planted with appropriate plant materials. The Original Project will not impact an existing significant plant community, and it will establish a significant plant community.
- Open Space Conservation Areas: The site is not designated as an open space conservation area. In addition, the wetlands in the SR-1 right-of-way adjacent to

the project site will be retained and a conservation buffer will be established on the project site, thereby improving the function and appearance of the wetlands.

- Heritage Downtown: The site is located in South Downtown, not in Heritage Downtown.
- Substantially Undeveloped Planned Developments: While the site had been a Planned Development prior to the update of the Land Use Plan in 2020, this criterion is no longer applicable.
- Parks: The site does not and will not include a park. It is adjacent to the City's gateway signage and plantings and provides a significant setback from these features. The Original Project's aesthetic relationship to the Southern Gateway to Downtown is discussed in detail at the end of this topical response. Project buildout will also provide future public access along the multi-use pathway; however, this is a new amenity enabled by the project and is not a park.

Consistency with the Local Coastal Program and Municipal Code

As described in the Draft EIR, the Original Project's potential aesthetic impacts have been assessed for consistency with the Local Coastal Program, including Local Coastal Land Use Plan policies and Municipal Code §18.37 (Visual Resource Protection Standards), as well as Municipal Code §14.37 (Architectural, Landscape and Site Plan Review). As identified in the previous section, applicable visual resources are the Town Boulevard Corridor and upland slopes.

Local Coastal Land Use Plan: Policies 9-1 (Scenic and Visual Resource Areas), 9-2 (Scenic Resource Protection), 9-3 (Visual Quality), 9-5 (Visual Impact Evaluation), 9-6 (Site Planning and Design for New Development), 9-8 (Land Divisions), 9-12 (Town Boulevard Scenic Corridor), 9-23 (Upland Slopes and Ridgelines), 9-30 (Dark Night Skies), and 9-31 (Lighting Plan Review) in Chapter 9 of the Local Coastal Land Use Plan, Scenic and Visual Resources, are applicable to this project. Each policy is presented below followed by a statement regarding Original Project consistency with that policy. As previously presented in the Draft EIR, the Original Project conflicts with Policies 9-12 and 9-23 due to visual intrusion into the ridgeline of the Santa Cruz Mountain foothills when the project is viewed from SR-1, which is defined as a protected visual resource in the Land Use Plan. The Original Project will not conflict with the other applicable Land Use Plan policies as explained in the Draft EIR and further described below.

Policy 9-1. Scenic and Visual Resource Areas. Identify and protect scenic and visual resource areas in Half Moon Bay, including but not limited to the scenic corridors, natural resource areas, and built environment resources as defined in this chapter and designated on Figure 9-1.

Consistency: Figure 9-1 (Scenic and Visual Resource Areas) shows the location of visual resource areas, including upland slopes, none of which occur in the Town Center or on the project site. Policies limiting development on upland slopes do not apply to this project because no development on upland slopes is proposed. Other

policies better address development at lower elevations for the protection of upland slopes.

Policy 9-2. Scenic Resource Protection. New development shall be sited and designed to protect views to and along the ocean, to minimize the alteration of natural landform, to be visually compatible with the character of its setting, and, where feasible, to restore and enhance visual quality in visually degraded areas.

Consistency: The Original Project does not block views to or along the ocean because such views are not available from the project site; the Original Project will be developed on a relatively flat site and therefore would not alter a natural landform; the siting, massing, and architectural treatments of the Original Project are in scale with newer development in the South Downtown portion of the Town Center and include materials and building forms compatible with existing architectural structures such as board and batten siding, dormers, and weathered siding reminiscent of agricultural buildings such as barns. Nevertheless, the Original Project is inconsistent with Policy 9-2, as it would affect views of the ridgeline and upland slopes, which are natural landforms protected under this policy (see text changes in Chapter 3.0, EIR Text Revisions).

Policy 9-3. Visual Quality. Preserve and enhance the unique visual quality that contributes to Half Moon Bay's coastal and small-town character, including its open, expansive views from the coastal terrace to the beaches, bluffs, ocean, and upland slopes.

Consistency: For the project site, views of the upland slopes are relevant. Implementation of this policy for preserving views of the upland slopes is further defined in Policies 9-12 and 9-23.

Policy 9-5. Visual Impact Evaluation. Where any development is proposed within a scenic and visual resource area, including as designated on Figure 9-1, a site-specific visual impact evaluation shall be required and may include visual simulations, story poles, and/or other means of visual assessment as appropriate based on the type and location of development.

Consistency: Design review by the Architectural Advisory Committee and the Planning Commission was undertaken at several sessions, including at a noticed and well-attended joint study session on June 29, 2021.

Policy 9-6. Site Planning and Design for New Development. Require new development to be subject to design review to ensure it is sited and designed to protect public views of scenic and visual resource areas and to be visually compatible with the character of the surrounding area. Measures to be considered may include, but are not limited to the following:

- a. Siting development in the least visible portion of the site;*

- b. Breaking up the mass of new structures;*
- c. Designing structures to blend into the surrounding natural landscape;*
- d. Restricting building maximum size and height;*
- e. Clustering or distributing development;*
- f. Incorporating landscape elements and screening; and*
- g. Conformance with any adopted design guidelines.*

Consistency: The project's site planning and design includes several of the elements presented in Policy 9-6 including deep setbacks, development broken up into multiple buildings, use of weathered and coastal compatible siding and roofing, conformance with height and building size limits for the land use designation, use of the landscape elements compatible with the wetlands on the west side of the project and consistent with the town's streetscape pattern on the east side of the site.

Policy 9-8. Land Divisions. Require land divisions, including lot line adjustments, to be designed in a manner that minimizes impacts to visual resources. Measures for minimizing visual impacts include the following:

- a. Clustering the building sites to minimize site disturbance and maximize open space;*
- b. Prohibiting land divisions and adjustments that would create lots with insufficient space for development, including to avoid the need for fuel modification, without impacting visual resources;*
- c. Requiring new land divisions to provide sufficient park and open space areas;*
- d. Prohibiting creation of new building sites above the 160-foot contour line within City limits;*
- e. Minimizing the length and impermeability of access roads and driveways;*
- f. Using shared or abutting driveways to access development on adjacent lots, where appropriate;*
- g. Reducing the maximum allowable density in steeply sloping and visually sensitive areas; and*
- h. Revegetating graded building pad areas, if any, with native plants.*

Consistency: Consistent with parts a and c, the site plan maximizes open space on the south and west sides of the property including space for public use; consistent with part b, the project does not include subdivisions that will impact fuel modification; consistent with parts d and g, the site is not located on a slope or above the 160-foot contour line; consistent with parts e and f, driveways are limited to those necessary to access and service the site; and consistent with part h, the site will

include significant native plantings as part of the wetland conservation and landscaping plan.

Policy 9-12. Town Boulevard Scenic Corridor. Require that new development in close proximity to or easily visible from the Town Boulevard scenic corridor, including Highways 1 and 92:

- a. Protects views of visual resource areas as seen from the Town Boulevard, including views to the ocean, upland slopes (i.e. minimizes intrusions into the ridgeline), and the historic Johnston House;*
- b. Incorporates design standards such as screening of commercial parking areas and landscaping provisions; and*
- c. Is visually compatible with the surrounding land and development.*

Update the IP with additional standards for new development along the Town Boulevard based on additional study of the scenic corridor. Assessment should, at a minimum, consider views of visual resource areas from the perspective of existing and potential development along the Town Boulevard and identify scenic segments along Highway 1 and 92, including views of the ridgelines and other visual resource areas. Development standards should address, at a minimum, appropriate building heights and setbacks, longest wall lines, minimum space between buildings, and streetscape design.

Consistency: The Draft EIR identified that the Original Project conflicted with part “a” of Policy 9-12 in that the project would intrude into views of the ridgeline. Two Viewpoints, 2 and 3, simulate northbound views from SR-1 across the project site toward the hillsides to the north and east. From Viewpoint 3, the Original Project is shown to intrude into the view of the ridgeline. The Original Project did not conflict with any other parts of Policy 9-12 in that it did not block views to the ocean or the Johnston House, the parking lot would be screened by landscaping, and visual compatibility would be maintained with the surrounding land development as previously described with respect to Policy 9-6. Modified Alternative 2, is smaller than the Original Project and does not intrude into the ridgeline as presented in Viewpoints 2 and 3.

Policy 9-23. Upland Slopes and Ridgelines. Protect broad views of upland slopes, prominent ridgelines and other intervening ridgelines as viewed from scenic corridors and the beach and shoreline through the following means:

- a. Prohibiting new development above the 160-foot contour line and on slopes greater than 30 percent, including grading and subdivisions but excluding public trails and critical facilities or public infrastructure that cannot be located elsewhere;*

b. Ensuring new development below the 160-foot contour line is sited and designed to minimize intrusions into the ridgeline through the application of appropriate height and setback restrictions; and

c. Establishing standards for the Town Boulevard, other streetscapes, and large-scale landscaping projects to highlight and frame, but not block, views of visual resource areas.

Consistency: The Draft EIR identified that the Original Project would intrude into views of the ridgeline as previously discussed for Policy 9-12, above, which conflicts with part “b” of Policy 9-23. The Original Project would be consistent with part “a” of Policy 9-23 because the project site is located below the 160-foot contour line and is relatively flat. While part “c” of Policy 9-23 is not site specific or directly applicable to this project, the Original Project design uses landscaping and setbacks to reduce blockage of views of the ridgeline. Modified Alternative 2, which is smaller than the Original Project, does not intrude into the ridgeline as presented in Viewpoints 2 and 3.

Policy 9-30. Dark Night Skies. Protect dark night skies as part of Half Moon Bay’s scenic and visual character by preventing light pollution from development. Avoid impacts from exterior lighting on dark night skies, sensitive habitat areas, and agricultural operations by:

a. Limiting exterior lighting to low-intensity fixtures that are shielded, down-cast, and concealed so that the light source is not directly visible from public viewing areas, with the exception of traffic lights, navigational lights, and other similar safety lighting;

b. Limiting installation and use of high-intensity perimeter lighting and lighting for sports fields, other private recreational facilities, or public facilities in scenic areas, with the exception of safety lighting provided that any high-intensity lighting is down-cast, shielded, and minimizes spillover; and

c. Reducing light pollution from greenhouses as a condition of approval for new development through shielding and other practices that minimize light spillover.

Consistency: The Draft EIR evaluates the Original Project’s exterior lighting for light and glare impacts. The Original Project incorporates dark skies compatible light fixtures as required by part “a” of Policy 9-30. Parts “b” and “c” are not applicable to the Original Project because it does not include high-intensity field lighting or a greenhouse. The Original Project does include a swimming pool located in a greenhouse light structure; however, it would not be brightly lit overnight like a greenhouse. Modified Alternative 2, which is now the Proposed Project, does not include the swimming pool component of the Original Project analyzed in the Draft EIR.

Policy 9-31. Lighting Plan Review. Require submittal of lighting plans with applications for new development, including subdivisions, for review of lighting characteristics.

Consistency: Lighting plan review with the building permit plans, which is a standard requirement of the building permit submittal, will ensure conformance with this policy, as well as with Policy 9-30.

Municipal Code: The project was evaluated for consistency with Municipal Code sections that regulate aesthetics. These sections are §18.37 (Visual Resource Protection Standards), which is part of the certified Local Coastal Program; and §14.37 (Architectural, Landscape and Site Plan Review), which is not part of the Local Coastal Program. These sections contain standards for scenic corridors, upland slopes, and design review, as summarized below:

- **Scenic Corridors:** The Municipal Code indicates that SR-1 is to be treated as a visual resource area, even if it is not a State-designated scenic highway, as shown in the visual resource area map in the Local Coastal Land Use Plan (§18.37.020.A.1). As presented above, the Land Use Plan includes SR-1 as part of the Town Boulevard Corridor which is a protected visual resource. Thus, the Draft EIR considered all “Highway One Corridor” standards in the zoning ordinance, §18.37.030 (Scenic Corridor Standards) to be potentially applicable, although many of these standards address ocean views. For this site, the Scenic Corridor Standards require setbacks from SR-1, screening parking lots with landscaping, landscaping that establishes scenic gateways, and no off-premises advertising. The Original Project design is consistent with these requirements.
- **Upland Slopes:** Although the site is flat and well below the 160-foot contour and therefore the Original Project does not involve developing an upland slope pursuant to §18.37.020.B, upland slope standards were considered, including §18.37.035.C: “Structures shall be sited to not intrude or project above the ridge line skyline as seen from Highways One and 92.” That evaluation determined that the project would have an impact as described above for Policies 9-12 and 9-23 because of a visual intrusion into the ridgeline as viewed from SR-1.
- **Architectural, Landscape and Site Plan Review:** §14.37 establishes the City’s design review process and states the design considerations that must be used as part of that process. Both the Original project and Modified Alternative 2 have undergone design review by the City’s Architectural Advisory Committee and Planning Commission and will be subject to Design Review and Architectural approval prior to construction.

Policy and Code Implementation: Some commenters questioned how the Local Coastal Program policies and visual resource protection standards were implemented in evaluating the Original Project’s impact on views of the hillsides. These comments also suggest that the Original Project’s aesthetic impact is not limited to its visual intrusion of views of the ridgeline from SR-1, but rather of the hills in general and from other locations than those defined as visual resource areas in the Local Coastal Program.

There are no formal definitions in the certified Local Coastal Land Use Plan, Implementation Plan (including the Subdivision and Zoning Ordinance), or within the Municipal Code for the following terms: “hillsides,” “upland slopes,” or “ridgelines.” The same or similar terms are used in the Local Coastal Land Use Plan (especially Chapter 9. Visual Resources) and the Zoning Code. Despite the lack of *adopted* definitions, Local Coastal Land Use Plan narrative and policies help define the intended use of these terms and set the framework for controlling development on hillsides and prohibiting it above the 160-foot contour line.

- Local Coastal Land Use Plan, page 9-16: The Natural Resources section of Chapter 9, under the heading “Upland Slopes,” states that the City’s longstanding policy has “effectively kept development below the 160-foot contour line” which has created “a scenic backdrop that contributes greatly to the overall visual quality.” Then it refers to these “mostly undeveloped upland slopes, including the hillsides and ridgelines” as “upland slopes” that “provide context and visually frame many of the other scenic resources in the area.”
- Local Coastal Land Use Plan, p. 9-19: Similar language occurs in the introduction to the Chapter 9 Scenic and Visual Resources policies: “emphasizing preservation of upland slope and ridgeline views . . . The LUP retains long-standing policies to keep development below the 160-foot contour line on hillsides and requires lower-scale building height along . . . view corridors.”

To implement these policies, the Local Coastal Land Use Plan Development Standards policies call for the following processes to be completed:

- Policy 9-5 (Visual Impact Evaluation) requires an evaluation that may include visual simulations and story poles. Visual simulations were developed for and presented in the Draft EIR, and story poles have been provided on the project site.
- Policy 9-6 (Site Planning and Design for New Development) calls for “design review.” Design review by the Architectural Advisory Committee and the Planning Commission has taken place and project design and project design features were previously discussed above with respect to consistency with this policy.
- Policy 9-8 (Land Divisions), part d, prohibits “creation of new building sites above the 160-foot contour line,” which is not proposed as part of the Original Project.

Scenic Corridor Policies 9-12 and 9-23, previously discussed, provide the specific guidance that visual resource protection of upland slopes consists of minimization of intrusions into the ridgeline, see below with bold emphasis added:

- Policy 9-12 (Town Center Boulevard Scenic Corridor), requires “new development in close proximity to or easily visible from the Town Boulevard scenic corridor” to “protect views of visual resource areas as seen from Town Boulevard, including views to . . . upland slopes (i.e., **minimizes intrusions into the ridgeline**) . . .”
- Policy 9-23 (Upland Slopes and Ridgelines) confirms this interpretation.
 - Part a prohibits “new development above the 160-foot contour.”

- Part b requires ensuring that **“new development below the 160-foot contour line is sited and designed to minimize intrusions into the ridgeline.”**
- Part c requires the establishment of standards for the Town Boulevard “to highlight and frame, but not block, views of visual resource areas.” This requirement acknowledges that the visibility of new development is anticipated but needs to be managed through standards.

The regulations in the Zoning Ordinance, which serves as part of the Implementation Plan for the certified Local Coastal Program, are consistent with the Local Coastal Land Use Plan policies for this matter. Municipal Code Chapter 18.37, Visual Resource Protection Standards, provides the following additional references to visual resource protection of hillsides and/or upland slopes:

- §18.37.020.A.1 (Visual Resource Areas), defines Highway One “in those areas shown on the visual resources overlay map in the city’s local coastal program land use plan.” This is a reference to Figure 9.1 in the Local Coastal Land Use Plan.
- §18.37.020.B (Upland Slopes) describes “upland slopes” as “[s]cenic hillsides which are visible from Highway One . . . as indicated on the visual resources overlay map. These areas occur include [sic] hillside areas above the one hundred sixty-foot elevation contour line which are located . . .” in specific areas listed in parts 1-4. Again, this is a reference to Figure 9.1 in the Local Coastal Land Use Plan. As previously explained, no such upland slopes occur on the project site.
- §18.37.030 (Scenic Corridor Standards) requires public views within and from scenic corridors to be “protected and enhanced” according to standards listed in parts A-E. Most of the standards refer to “ocean views” and some refer to views of “scenic coastal areas.”
- §18.37.030.B.5 “low height above natural grade” is favored “unless a greater height would not obstruct public views.” As discussed in the discussion of the Local Coastal Land Use Plan policies, above, and in 18.37.035, below, obstruction of public views of hills is measured by obstruction of views of the ridgeline.
- §18.37.035 (Upland Slope Standards), part C, requires that **“[s]tructures shall be sited so as not to intrude or project above the ridge line skyline as seen from Highways One and 92.”** This section is consistent with Local Coastal Program Policies 9-12 and 9-23 that protection of views of upland slopes is measured by intrusion into the view of the ridgeline.

Some comments also referred to the evaluation of visual resource impacts associated with a prior project (fire training tower) in 2016, noting that the City’s approval of that structure had been appealed to the Coastal Commission due primarily to aesthetic concerns related to view blockage of upland slopes. At that time, the Coastal Commission provided guidance for considering such visual impacts. Its guidance informed the 2020 update to the Local Coastal Land Use Plan, which had not yet been

adopted. Thus, that past project is part of the context of Land Use Plan policy development, and it was taken into account when the current LCLUP policies that apply to this project were adopted.

In conclusion, applicable policies and standards from the certified Local Coastal Program consistently state that impacts on a scenic resource involving views of hillsides and/or upland slopes are determined by whether the Original Project would block views of the upland slopes to the extent that it intrudes into the *ridgeline*. The analysis in this EIR is consistent with past practice and with the certified language in the 2020 Local Coastal Program.

CEQA Thresholds

The Proposed Project would create changes to the visual character of the site, and the analysis in the Draft EIR focuses on whether the Proposed Project will exceed the applicable CEQA thresholds.

Project Impacts: For this project, the CEQA Guidelines Appendix G Environmental Checklist (“CEQA checklist”) and the Local Coastal Program establish thresholds for evaluating impacts on aesthetics. The analysis in the EIR is based on the CEQA checklist in Section I.a) - .d), Aesthetics, which require responses concerning whether the project would:

1. Have a substantial adverse effect on a scenic vista?
2. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway?
3. Substantially degrade the existing visual character or quality of the site and its surroundings?
4. Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?

Questions 1 and 2: For the first two questions, the analysis was based on the project’s consistency with the Local Coastal Program. A scenic resource is defined by the Local Coastal Program as any area or feature, natural or man-made, that significantly contributes to the visual appeal and aesthetic quality of the coastal environment. As previously stated, the Original Project conflicts with Policies 9-12 and 9-23 due to the visual intrusion into the ridgeline of the Santa Cruz Mountain foothills, which is defined as a protected visual resource in the Land Use Plan, when the project is viewed from SR-1. This was demonstrated with the use of visual simulations (Viewpoints 2 and 3) wherein an impact was demonstrated for one of the viewpoints. Thus, the Draft EIR identified that the Original Project would have a significant and unavoidable impact in response to the first two questions; although with respect to the second question, it should be noted that the City took a conservative approach by identifying this as an

impact because the Original Project would not physically damage any protected visual resources, rather, it intrudes on a view of one of them, specifically the ridgeline.

Question 3: For the third question, the assessment considered the current condition of the relatively large undeveloped site, which had previously been in agricultural use, in comparison to the new development and found that the change would be significant, especially based on the input of concerned community members, that there would be a substantial degradation of the quality of the site and its surroundings. The Draft EIR identified that the Original Project would result in a significant and unavoidable impact for this criteria.

Question 4: Based on the nighttime lighting study and the requirement to implement Land Use Plan Policies 9-30 and 9-31, no impact was found for question 4.

Design Considerations and Alternatives: Numerous design approaches were undertaken to reduce the Original Project's visual impacts. The third story of the lodging buildings consists of a dormer roof form to reduce the bulk of the top floor. The Original Project's buildings step down in height from the north end of the site toward the southern gateway corner to maintain openness and are deeply setback from SR-1 to reduce visual intrusion into the ridgeline of the hills to the east. Despite these design considerations, views of the ridgelines would be obstructed as viewed from northbound SR-1 approaching the project site from the south. There are no other feasible measures that would reduce the impact to the scenic vistas given the mass and scale of the Original Project.

Following the circulation of the Draft EIR, the applicant submitted revised plans containing modifications to Alternative 2. Alternative 2 has accordingly been renamed "Modified Alternative 2" in the Final EIR. Modified Alternative 2 continues to be the Reduced Intensity alternative and is the applicant's Proposed Project. Modified Alternative 2 would reduce degradation of existing visual character or quality of the site and its surroundings due to blockage of views compared to the Original Project, and as described in the text revisions to Chapter 5.0, Alternatives, Modified Alternative 2 would substantially reduce the aesthetic impacts associated with the Original Project. The protected view of the ridgeline (available from Viewpoints 2 and 3) would not be obstructed by the structures associated with Modified Alternative 2.

Special Considerations: Southern Gateway to Downtown and Wavecrest

Southern Gateway: Several comments concerned the Original Project's visual impact on the gateway into Downtown south of the project site. The southern entrance to Downtown, located at the intersection of SR-1/South Main Street/Higgins Canyon Road at the southern tip of the project site, is a gateway that marks the southern entrance into Downtown Half Moon Bay from SR-1. The City's new gateway signage and landscaping associated with the recently installed traffic signal at SR-1/South Main Street/Higgins Canyon Road are located at the southern edge of the project site. The project site is a

transition point from a relatively rural land use context to the south to the developed Downtown to the north. As such, it is a primary objective of the City that the project be designed to be contextually appropriate for this important location. Consistent with zoning and to maintain visual openness at this intersection, the hotel would have a significant setback from this intersection as well as from SR-1 along its entire length. These setbacks would preserve the character of the existing openness at the gateway location while also facilitating the transition from the rural land uses to the developed Downtown. Compatibility with Downtown development would result from compliance with zoning controls for height, setbacks, and massing as well as from architectural design approaches including massing the third floors within dormers and use of cladding materials that appear weathered and blend with the coastal setting. The hotel design, including the site plan, setbacks, massing, architectural design, and materials, was reviewed by the Half Moon Bay Architectural Advisory Committee. Neither the Original Project nor Modified Alternative 2 impose an environmental impact on the southern gateway.

Wavecrest: Additional comments concerned the project's visual impact on the Wavecrest area west of the project site. The Draft EIR explains that the view from Main Street across the project site and SR-1 to Wavecrest provides a view of an open field, and not the coastal views available from the western side of Wavecrest. Neither the Original Project nor Modified Alternative 2 blocks views of Wavecrest from SR-1. Views of Wavecrest from Main Street are not protected views pursuant to the City's certified Local Coastal Program.

Topical Response 3: Water and Hydrology

Several comments concern water scarcity and increased water usage generated by implementation of the project. As discussed in Section 4.16, Utilities and Service Systems (page 4.16-2 of the Draft EIR), the Coastside County Water District (CWD) would provide potable water to the project site. The Coastside CWD's water supply comes from multiple sources, which include the Pilarcitos Reservoir, Upper Crystal Springs Reservoir, Pilarcitos Creek, Denniston Creek, and groundwater from the Airport Subbasin. The San Francisco Public Utilities Commission owns and operates Pilarcitos Reservoir and Upper Crystal Springs Reservoir. Pilarcitos Creek Infiltration Wells, Denniston Creek, and groundwater from the airport subbasin are owned and operated by Coastside CWD. These sources yield an average of 756 million gallons of water annually. Coastside CWD purchases approximately 73 percent of its water supply annually from the San Francisco Public Utilities Commission.

The Coastside CWD has determined that it has enough water to supply operation of the project and reasonably foreseeable future development during normal dry, and multiple dry years (i.e., drought periods). Coastside CWD has also determined that implementation of the project would not require the relocation or construction of new or expanded water facilities to supply the project site with potable water. Coastside CWD's

service area produced 622 million gallons of water in 2021 and has sufficient resources to produce 1,000 million gallons of water annually in normal water years. The 2020 Urban Water Management Plan projects water usage for hotels as 25 million gallons (mg) per year.² The median rate of water use for hotels is 102 gallons per room per day.³ Therefore, operation of the Original Project would use 4.8 million gallons of water annually. It is also notable that the water demand modeling in the LCLUP used 200 gallons per room per day for hotel uses to be conservative in its water demand analysis. That analysis assumed that an additional 200 hotel rooms would be developed during the 2040 planning horizon; therefore, the Original Project would fit within the LCLUP's 2040 buildout projection. Original Project water demand would result in approximately a 1 percent increase in total demand, which would not require the construction of new or expanded water facilities.

In addition, the Original Project will comply with HMB LCLUP Policy 3-25: Water Conservation Measures through measures such as drought tolerant plantings. Landscaping on the west side of the site consists of wetlands restoration and native plantings which will require very limited irrigation. All landscaping will be reviewed for compliance with the Water Efficiency Landscape Ordinance.

Water consumption would need to be reduced during multiple dry years to meet water demand requirements, however, depending on the severity of the water shortage. Water reduction measures would be put in place for the project by the water district during periods of water shortage.

Commenters also expressed concerns regarding impacts associated with stormwater runoff. As discussed in Section 4.10, Hydrology and Water Quality (page 4.10-19 of the Draft EIR), construction activities would be subject to a National Pollutant Discharge Elimination Discharge System (NPDES) General Construction Permit, issued by the Regional Water Quality Control Board, which would contain water quality control requirements. These requirements include the implementation of a Stormwater Pollution Prevention Plan to identify potential pollutant sources and prescribe best management practices (BMPs) that would be used to avoid impacts to surface water or groundwater quality during construction.

Project operation would be subject to post-construction provisions of the C.3 Stormwater Technical Guidance Manual for the NPDES permit, requiring incorporation of source control design elements to prevent pollutants from entering stormwater. Maintenance

² Coastsidewater.org, 2020. *2020 Urban Water Management Plan*. Available: https://www.coastsidewater.org/reports_and_studies/2020-Urban-Water-Management-Plan.pdf. Accessed: July 2024

³ Energy Star, 2016. *Water Use Tracking*. Available: https://www.energystar.gov/sites/default/files/buildings/tools/DataTrends_Water_20121002.pdf. Accessed: July 2024.

agreements, such as parking lot sweeping and catch basin cleaning, as well as storm drain signs and stenciling, would be required under NPDES permit conditions. The Original Project design would include a dual treatment system of self-retaining landscape areas and bio retention areas along the west side of the project site. This treatment would prevent polluted stormwater from entering wetlands, degrading surface water quality, or negatively impacting groundwater quality.

The Sewer Authority Mid-Coastside (SAM) has determined there is sufficient wastewater treatment capacity to accommodate the implementation of the project. Project operation would use less than 1 percent of the SAM Plant's maximum daily capacity.

Topical Response 4: Emergency Access and Traffic Safety

Emergency Access

Several comments concern project interference with emergency access, specifically for fire fighters.

As discussed in Section 4.15, Transportation and Traffic (page 4.15-42 of the Draft EIR), the internal roadway system at the project site has been designed with the assistance of traffic engineers to ensure safe and efficient circulation and will comply with all modern standards of the Fire Code and other applicable ordinances and regulations. Emergency vehicle access is proposed to be located at the south end of the project site, and an emergency egress is planned along a paved alley between the auto dealership and SR-1 which would exit as a right-turn only onto eastbound Seymour Street. As such, the impact to emergency access would be less than significant for both the Original Project and Modified Alternative 2.

In addition, as described below, the design of both the Original Project and Modified Alternative 2 would be consistent with state and local policies, regulations, and plans related to emergency access and traffic safety.

State

Emergency Response

The State has authorized the Office of Emergency Services to prepare a Standard Emergency Management System program, which sets forth measures by which a jurisdiction should handle emergency disasters. Non-compliance with the State Emergency Management Systems could result in the State withholding disaster relief from the non-complying jurisdiction in the event of an emergency disaster. See Section 4.14, Public Services and Recreation (page 4.14-8 of the Draft EIR) for more information on state and local safety codes. Neither the Original Project nor Modified Alternative 2 would interfere with State Emergency Management Systems.

California Fire Code

The California Fire Code contains regulations relating to construction and maintenance of buildings and the use of premises. Fire hazards are addressed mainly through the application of the State Fire Code that addresses access, including roads, and vegetation removal in high fire hazard areas, fire hydrants, automatic sprinkler systems, fire alarm systems, fire and explosion hazards safety, and many other general and specialized fire safety requirements. See Section 4.14, Public Services and Recreation (page 4-14-7 of the Draft EIR), for more information on state and local safety codes.

The Project design meets the requirements of the California Fire Code. Construction activities would adhere to the regulations and neither the Original Project nor Modified Alternative 2 would interfere with emergency access.

California Occupational Safety and Health Administration

The California Occupational Safety and Health Administration has established minimum standards for fire suppression and emergency medical services. The standards apply to the handling of highly combustible materials, fire hose sizing requirements, access roads, and the testing, maintenance, and use of all firefighting and emergency medical equipment. See Section 4.14, Public Services and Recreation (page 4.14-7 of the Draft EIR), for more information on state and local safety codes.

Neither the Original Project nor Modified Alternative 2 would interfere with standards established by the California Occupational Safety and Health Administration

Local

Half Moon Bay LCLUP Policy 2-2 states that “To the maximum extent practicable, limit future access along Highway 1 and SR-92 to signalized intersections located in accordance with adopted traffic improvements exercising flexibility to reflect changes in conditions and mobility needs over time. Access to existing properties will be modified and consolidated at these designated locations when possible. Additional signalization of the existing intersections along Highway 1 will be considered if warranted and necessary to provide safe and convenient access to and egress from established residential neighborhoods and commercial districts.”

Vehicle access to the project site would be provided via three driveways: two driveways on South Main Street and one emergency vehicle access driveway on Seymour Street.

Traffic Safety

Commenters also stated that the Original Project will result in increased traffic leading to increased accidents and interference with emergency evacuation from the city, especially in the event of a wildfire. Commenters also raised concerns about the Original Project interfering with emergency response time.

The amount of traffic predicted to enter and exit a site is referred to as the project's trip generation. The Original Project is expected to generate an average of 575 trips per day, including 44 trips during the a.m. peak hour, 46 during the p.m. peak hour and 93 during the weekend peak hour; these new trips represent the increase in traffic associated with the Original Project. These estimates are based on the assumption that none of the hotel staff will walk or bike to the hotel. The actual number of trips could be less than estimated, however, because the project applicant intends to hire staff comprised mostly of local residents, a portion of whom would be able to walk or ride a bicycle to and from the hotel.

As explained in Appendix H, Traffic Impact Study, of the Draft EIR, the trip distribution pattern used to allocate new project trips to the street network was determined by field observations of the project site, traffic count data, as well as based on assumptions applied in a similar hotel development. With the addition of project-related traffic to the Background Condition traffic volumes (includes Existing Condition traffic plus the forecast traffic demand/volumes due to local and regional growth for the near-term condition), all of the study intersections would continue to operate at acceptable levels of service, with the exception of SR-1/Seymour Street. Here, under the p.m. and weekend peak hours, the stop-controlled Seymour Street approach at the intersection of SR-1/Seymour Street would operate at an unacceptable level of service (LOS) F with or without the addition of project-generated vehicle trips. Both the Original Project and Modified Alternative 2's trip contribution would result in a less-than-significant impact at this intersection because the resulting traffic volumes, including project-related trips, would not satisfy the peak hour volume to warrant the installation of traffic signals. Furthermore, instead of waiting to make a left turn at an uncontrolled intersection, drivers would have the option to turn left at the new signal at Higgins Canyon Road and South Main Street, which provides a safer option.

As explained above and in Appendix 3.0-A, Attachment to EIR Text Revisions, to this Final EIR, neither the Original Project nor Modified Alternative 2 would interfere with any adopted State Emergency Management Systems. Section 4.14, Public Services and Recreation (page 4.14-17 to 4.14-18 of the Draft EIR), discusses that the Original Project would not interfere with an emergency response plan or evacuation route. Furthermore, the Coastside Patrol Bureau does not foresee any interference that the Original Project could have on emergency response, plans, or evacuation routes⁴.

Topical Response 5: Modified Alternative 2

Several comments concern Alternative 2, Reduced Intensity Alternative, described in Chapter 5.0, Alternatives of the Draft EIR. This Response is intended to clarify the

⁴ Riddell, John, Deputy Fire Marshall. Coastside Fire Protection District. Personal Communication. July 2019.

design and features included in Alternative 2, further describe some of the analysis conducted for Alternative 2, and explain that Alternative 2 has been revised and is now referred to as Modified Alternative 2.

As described in the Draft EIR, Alternative 2 consisted of a smaller hotel with fewer rooms than the Original Project plus a residential component. Following circulation of the Draft EIR, the applicant submitted revised plans to the City indicating that Alternative 2 (with revisions), is now the Proposed Project that would be considered for approval. This Proposed Project is described in the Final EIR as “Modified Alternative 2”.

The main differences between Alternative 2 and Modified Alternative 2 are as follows:

- Modified Alternative 2 would reduce the hotel square footage from 66,783 in Alternative 2 to 66,268 square feet.
- Modified Alternative 2 would include a four-lot parcel map allowing for future development of up to 16 units on four lots (Lots 1-4), compared to smaller lots in Alternative 2.
- Modified Alternative 2 would increase the space between the two hotel buildings from 16 feet in Alternative 2 to 32 feet. To accommodate this additional spacing, the lot line adjustment between the hotel and automobile dealership parcels would add 0.451 acres to the dealership compared to 0.61 acres in Alternative 2, which would create a 4.57-acre hotel site compared to 4.41 acres in Alternative 2.
- For Modified Alternative 2, minor adjustments as presented for Alternative 2 to the parking lot layout and drive aisles were made to better accommodate service vehicles.
- Alternative 2 would have resulted in a new parcel fully within the wetlands buffer. By comparison, Modified Alternative 2 conforms with LCLUP Policy 6-57 because all proposed parcels can be developed without encroachment into environmentally sensitive habitat area (ESHA) designated area or a required ESHA buffer.
- In comparison to Alternative 2, Modified Alternative 2 provides a detailed proposal for how this alternative will address mitigation for the conversion of agricultural land through payment of in-lieu fees in accordance with the Half Moon Bay LCLUP.
- In comparison to Alternative 2, Modified Alternative 2 provides a detailed proposal for how this alternative will address the provision of lower-cost visitor accommodations with a combination of lower-cost rooms and no-cost visitor-serving amenities available to the public in accordance with the Half Moon Bay LCLUP.

For a more detailed description of the revisions included in Modified Alternative 2, please see Appendix 3.0-A, Attachment to EIR Text Revisions, of this Final EIR.

Modified Alternative 2 involves the construction of a 66,268 square-foot, 102-room hotel on the project site, a four-lot parcel map allowing for development of up to 16 dwelling units along Seymour Street, and the expansion of the existing car dealership parking lot. The development of 16 dwelling units would be consistent with growth accounted for in the City's LCLUP. As proposed by the developer, the property would be subdivided, and the first lot to develop would include up to four units. Therefore, Modified Alternative 2 would support implementation of the City's housing goals in Chapter 2, Development, of the LCLUP.

While housing, and specifically affordable housing, are City priorities, this hotel site has been designated for commercial land use for many years through the previous L.C. Smith Estate Planned Development designation and associated PUD (Planned Unit Development) zoning. The updated LCLUP continued the intent of the former Planned Development designation by redesignating the site for the Commercial-General Land Use. While that designation allows for residential and/or mixed-use development, the site's location and orientation serve as the southern commercial gateway to Downtown Half Moon Bay. The City also recently lost a hotel, when the 52-room Coastside Inn was purchased by San Mateo County and converted to a homeless shelter; and thus, the continued land use focus for this property has been to maintain adequate visitor-serving commercial uses which aligns with the California Coastal Act (Government Code Section 51201(c)). The California Coastal Act prioritizes coastal access and recreation, and in addition to providing visitor accommodations, both the Original Project and Modified Alternative 2 include amenities such as bicycle rentals to support coastal access and recreation in Half Moon Bay.

Modified Alternative 2 would require a lot line adjustment on the 5.02-acre parcel, adding 0.45 acres to the auto dealership for expanded parking and using the remaining 4.57 acres for the hotel and open space. Adding 0.45 acres to the dealership allows for the creation of a parcel map dividing the 1.15-acre parcel on the north side of Seymour Street into four lots. The project applicant owns the 1.15-acre parcel and proposes that it be used for future residential development. This 1.15-acre parcel is designated as residential – medium density in the LCLUP, and the site is zoned for residential development in the R-2 (Two Family Residential) Zoning District. The existing use of the 1.15-acre parcel, as overflow parking for the dealership, is in conflict with the parcel's land use designation and zoning. However, residential development under Modified Alternative 2 would be consistent with the parcel's land use designation and zoning.

Neither implementation of the Original Project nor Modified Alternative 2 would result in inconsistencies with the Half Moon Bay LCLUP or Zoning Code, because the proposed hotel is consistent with the LCLUP land use designation and its intended rezoning to the Commercial-General district. As explained above and in the Final EIR, Text Revisions to Draft EIR Chapter 5.0, Modified Alternative 2 would have less-than-significant impacts related to land use, similar to the Original Project.

Modified Alternative 2 would meet the same objectives met by the Original Project. In some cases, Modified Alternative 2 would achieve the City's primary project objectives to a greater degree than the Original Project as described in the text revisions Chapter 5.0, Alternatives, of the Draft EIR.

The overall size of the hotel buildings would be reduced under Modified Alternative 2 (from 90,784 square feet to 66,268 square feet). Forty-four percent of the project site would be dedicated to open space under Modified Alternative 2, which is more open space than proposed as part of the Original Project. Dedicated open space would include bioretention areas using soil and plant-based filtration (i.e., green infrastructure) to naturally process stormwater runoff. This area would also include native plants and grasses. This dedicated open space and natural landscaping would support the City's and project applicant's objective of providing a development that is aesthetically pleasing by balancing the urban landscape with natural elements of the coast. Modified Alternative 2 would reduce the size and scale of the hotel proposed as part of the Original Project, reducing significant impacts to aesthetic resources, as compared to the Original Project. The reduced building massing would be more reflective of traditional development and scale within the city and would help to maintain adequate views of the surrounding landscape. The reduced massing combined with the increased setbacks, open space, and natural landscaping proposed under Modified Alternative 2 would enhance the aesthetic of the City's southern Downtown gateway.

However, the project site is located adjacent to SR-1. Although this section of SR-1 is not officially designated as a scenic highway, the City considers it as a visual area subject to regulations applicable to a scenic corridor, and specifically relies upon Policy 9-12 in the 2020 certified LCLUP. Policy 9-12 also would be applicable to Modified Alternative 2, because Policy 9-12 requires new development in close proximity to or easily visible from the Town Boulevard scenic corridor, including SR-1 and SR-92, to incorporate specified design standards (i.e., screening of commercial parking areas, and landscaping provisions).

Given the above, Modified Alternative 2 would support the City's and project applicant's primary project objectives for aesthetic resources and design to a greater degree than the Original Project.

Topical Response 6: Cumulative Impacts

Several comments concern cumulative impacts. CEQA defines cumulative impacts as two or more individual effects that, when evaluated together, are considerable or compound or increase other environmental impacts (CEQA Guidelines 15355). Under CEQA, when a project would contribute to a cumulatively significant impact, an environmental impact report (EIR) must discuss whether the project's incremental effect is "cumulatively considerable," where cumulatively considerable means that the project's

incremental effect is significant when viewed in the context of past, present, and reasonably probable future projects.

When the combined cumulative impact associated with the project's incremental effect and the effects of other projects are not significant, the EIR will briefly indicate why the cumulative impact is not significant and is not discussed in further detail in the EIR. A lead agency shall identify facts and analysis supporting its conclusion that the cumulative impact is less than significant (CEQA Guidelines 15130(a)(2)). Other projects in the Half Moon Bay area include past and planned residential, commercial, and infrastructure development projects. See Section 4.0, Setting, Impacts, and Mitigation Measures, of the Draft EIR, for the full list of cumulative projects within Half Moon Bay.

Traffic

Upon the addition of project-generated traffic to the anticipated cumulative volumes, all the study intersections for the project would continue to operate at acceptable levels of service (D or better) as the cumulative No Project condition, with the exceptions of SR-1/North Main Street and SR-1/Seymour Street. Cumulative (2040) traffic volumes are shown in Figure 4.15-8. Also see Topic Response 4, Emergency Access and Traffic Safety, which further explains that impacts on such access and safety were evaluated and not found to be significant.

Although the intersection of SR-1/North Main Street would operate at LOS F during the weekend peak hour, this is not considered a significant impact because it would not satisfy the threshold criterion of the San Mateo County Congestion Management Program, The average control delay would increase by 2.6 seconds compared to the cumulative No Project condition, which is less than the four-second threshold that indicates a significant impact. Under the p.m. and weekend peak hours, the stop-controlled Seymour Street approach at the intersection of SR-1/Seymour Street would operate at an unacceptable LOS F with or without the addition of project-generated vehicle trips. Both the Original Project and Modified Alternative 2's trip contribution would result in a less-than-significant impact at this intersection. Also, under these conditions, the peak hour volume would not be sufficient enough to warrant the installation of traffic signals. Both the Original Project and Modified Alternative 2's trip contribution would result in a less-than-significant impact at this intersection. Therefore, neither the Original Project nor Modified Alternative 2, in conjunction with past, present, and foreseeable projects, would result in a cumulative impact.

Neither the Original Project nor Modified Alternative 2's contribution would result in a less-than-significant impact to VMT. Therefore, in conjunction with past, present, and foreseeable projects, neither the Original Project nor Modified Alternative 2 would result in a cumulative impact in regard to VMT. See Section 4.15, Transportation and Traffic (page 4.15-42 of the Draft EIR), EIR for more information on cumulative traffic impacts.

Cumulative plus Original Project traffic volumes are shown in Figure 4.15-9 (page 4.15-45 of the Draft EIR). The comparison between Cumulative No Project and Cumulative plus Project operating conditions are shown in Table 4.15-13 (page 4.15-46 of the Draft EIR). Also, a comparison of the Existing with Project and Cumulative with Project condition is included in Table 4.15-14 (page 4.17-47 of the Draft EIR). As shown in Table 4.15-13 and Table 4.15-14, intersections at LOS F occur with or without the project.

Given the above, neither the Original Project nor Modified Alternative 2, together with the projects in Table 4.0-1 (Chapter 4.0, Setting, Impacts, and Mitigation Measures, page 4.0-6 of the Draft EIR), would result in a cumulative impact related to traffic.

Aesthetics

As explained in Section 4.1.5 Cumulative Impacts, of the Draft EIR, the recent, current, and foreseeable future projects listed in Chapter 4.0, Setting, Impacts, and Mitigation Measures could cumulatively impact the Half Moon Bay's scenic quality in the following ways:

- Loss of visual resources within a state scenic highway
- Loss of scenic vistas, such as hillsides, open space, and coastal viewsheds
- Inconsistency with Half Moon Bay's visual character
- Degradation of the visual quality of public views of the site and its surroundings

The description of the project design is consistent with the requirements for developments within 200 yards of a scenic highway. Consideration was given to building massing, materials, site planning, and setbacks to avoid and minimize adverse impacts when viewed from public areas. This includes minimizing encroachments on hillside and ridgeline views, scenic corridors, and surrounding areas. Despite these efforts, it was determined that the Original Project would still make a cumulatively considerable contribution to the degradation of established viewsheds, or other scenic vistas especially the long-range views of hillsides and ridgelines in Half Moon Bay.

Development on these parcels is consistent with the buildout of the LCLUP. The project is in a developed area, bounded by SR-1 and Main Street. Benefits of the project include proximity to other major commercial developments and the Downtown District. Some architectural elements of the structures (e.g., the wood-like cladding, barn-form roofs, and the "greenhouse" approach to the swimming pool/fitness building) of the Original Project aim to reflect historic Half Moon Bay. The Original Project also incorporates extensive open space, providing a buffer and transition zone between less intensive land uses and densely developed commercial districts.

Project design was developed with the intention of reflecting components of the visual character and visual quality of the project site's surroundings to preserve the heritage and character of the city. Most existing visual resources would not be affected by project implementation. Resources such as trees and landscaping would be replaced and enhanced upon project completion. Notwithstanding the design and setbacks required of

the Original Project, it would contribute to a cumulative impact on aesthetics and visual resources due to the permanence of the site aesthetics and obstruction of hillsides and ridgelines views from SR-1. See Chapter 5.0, Alternatives, for information regarding aesthetics impacts related to Modified Alternative 2.

Topical Response 7: LCLUP and Zoning of the Hyatt site

For historical context about the property's land use designation and related zoning, the commentor is encouraged to review the following pages of the LCLUP, which provide a summary of the past premises for establishing PDs and the reasons that numerous PD designations were “retired” and redesignated in the 2020 LCLUP update due to changed circumstances. These discussions are provided in LCLUP Chapter 1 (Introduction and Framework), pages 1-20 through 1-23, and in Chapter 2 (Development), pages 2-12, 2-25, and 2-26. The property is also located within the designated South Downtown portion of the Town Center. A foundation of the LCLUP is to concentrate development in the Town Center area. Discussions about the Town Center are provided in LCLUP Chapter 1, page 1-42; Chapter 2, pages 2-15 through 2-17 as well as policies 2-4 Sustainable Land Use Pattern, 2-30 Town Center Planning, 2-31 Town Center Water Connections, 2-38 South Downtown Main Street Uses; and Chapter 3 (Public Works) Policy 3-4 Town Center Infrastructure.

The former PD designation required that the PD was to be developed consistent with C-G zoning but with a few additional design considerations, including a gateway treatment at the south end of the property to support the southern entrance to Downtown at SR-1 and South Main Street, and specified setbacks from Main Street and SR-1. Since this property was originally designated PD, the gateway has been fully implemented.

Furthermore, although not pertinent to the analysis in the Draft EIR, the Original Project differs from the former PD in the following ways that are more protective of the environment. Due to the presence of mapped wetlands, the project's SR-1 setbacks far exceed the setbacks specified by the 1996 LCLUP (30 feet from the property line along SR-1, 15 feet from the property line along Main Street, and 10 feet from the entry feature). The proposed setbacks from Main Street also exceed the former L. C. Smith Planned Development designation, referred to in the old LCLUP as a “modified General Commercial designation,” which is a direct reference to the Commercial-General Land Use Designation and the Commercial-General zoning district. Commercial-General zoning requires 25-foot front yard setbacks (applies to both the SR-1 and Main Street frontages) and 10-foot setbacks for rear or side yards (applies to the northern property line). The former L. C. Smith PD also required that at least 20 percent of the gross site area be set aside for common and public open space. As currently proposed, the approximately five-acre site will include two acres that cannot be developed due to the presence of wetlands and associated buffers. This area will also include a multi-use path for public use within the wetland buffer, as is an allowed Coastal Act and LCP use for such areas. Common open space for hotel use is also included. The total open space to

be provided by the Original Project is approximately 85,000 square feet, or 39 percent of the gross site area. The L. C. Smith designation had a 35-foot height limit, and the Commercial-General zoning district has a 36-foot height limit, which is only a one-foot height difference.

LCLUP Policy 1-2 Coastal Resource Protection Policies states: "In advance of updating the Implementation Plan for conformance with the policies of the 2020 Land Use Plan, the policies of the Land Use Plan shall provide the standard of review for any proposed new development, including where these policies are more protective of ESHA and other coastal resources and maximize public access as consistent with the Coastal Act." The proposal, in following its new land use designation and associated LCLUP policies, is more protective of ESHA than a project that would have met the requirements of the former L. C. Smith Estate PD. The Original Project would also provide coastal access that currently does not exist. 2020 LCLUP policy implementation results in a project form that would be more protective of other coastal resources, including visual resources, than would have been required by the former PD designation. Policy 1-2, as adopted, anticipates the situation of trailing adoption of Implementation Plan (Zoning) updates.

The City does not have any agreements with the property owner or the developer requiring the property to be rezoned. Rather, the City conducted a long and public LCLUP update process during which numerous public discussions about retiring the L.C. Smith Estate PD, as well as other PDs in the former LCLUP, were vetted. The City put forth through the LCLUP process clear intent to rezone the property, with or without this project. In Appendix A of the LCLUP, "Land Use Plan Implementation," Table A-1 Zoning Map Amendments, includes the L. C. Smith Estate PD property to be rezoned to C-G on page A-7.

In conclusion, neither the Original Project nor Modified Alternative 2 would conflict with the Coastal Act, LCLUP, or zoning, and neither requires approval of a zoning amendment.

2.3.2 PUBLIC COMMENTS

This subsection addresses public comments. A copy of each comment letter is provided followed by the response.

Agency Comments

Comment Letter: A-1, California Department of Transportation

CALIFORNIA STATE TRANSPORTATION AGENCY

GAVIN NEWSOM, GOVERNOR

California Department of Transportation

DISTRICT 4
OFFICE OF REGIONAL AND COMMUNITY PLANNING
P.O. BOX 23660, MS-10D | OAKLAND, CA 94623-0660
www.dot.ca.gov



September 6, 2022

SCH #: 2018032059
GTS #: 04-SM-2022-00448
GTS ID: 27080
Co/Rt/Pm: SM/1/27.804

Jill Ekas, Community Development Director
501 Main Street
Half Moon Bay, CA 94019

Re: Half Moon Bay Hyatt Place Project + Draft Environmental Impact Review (DEIR)

Dear Jill Ekas:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Half Moon Bay Hyatt Place Project. We are committed to ensuring that impacts to the State's multimodal transportation system and to our natural environment are identified and mitigated to support a safe, sustainable, integrated and efficient transportation system. The following comments are based on our review of the July 2022 DEIR.

Project Understanding

The project includes a proposed hotel with up to 129 guest rooms and ancillary features (bicycle rentals) on a 5-acre project site in the City of Half Moon Bay (City), San Mateo County (County). A surface parking lot for hotel guests and employees is proposed along the northern and eastern sides of the site. The guest rooms and ancillary features would be situated generally easterly on the site in a north south direction. The western portion of the site would be maintained as open space, comprising up to 39 percent of the project site. The construction of roads, utilities, amenities (pool, fitness center, etc.), and ancillary services associated with the hotel are considered as a part of the project. The project is near Highway 1.

Vehicle Miles Traveled (VMT) and Operations Analysis

A-1.1

Per the DEIR, this project is found to have a less-than-significant VMT impact with mitigation through a Transportation Demand Management (TDM) program, including an Airport Guest TDM measure that calls for an 'Airport/Coastal Shuttle'. However, it is unclear whether the airport/coastal shuttle would be able to meet guest demand and be financially feasible. Based on Table 4.15-6, with 79 daily airport guest trips at 29 miles per guest, the VMT reduction was only reduced by 378 – which equates to ~13 guest

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Jill Ekas, Director
September 6, 2022
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A-1.1 Cont. | trips using the shuttle daily. This measure indicates it may function as a tourist shuttle as well. Guests who choose not to get a rental car at the airport may opt to use Ridehsharing such as Uber or Lyft, which equates to similar VMT as renting a car. If this is found to be true after TDM monitoring, it may be necessary to find other means to mitigate project-generated VMT.

Regarding the *local guest trips*, the local guest trip length was calculated at four miles (the length of the City of Half Moon Bay). Caltrans requests clarification about the number of local guest trips. It is more likely that this project will appeal to regional guests from the North, East and South Bay area, rather than locals who live less than four miles from this proposed hotel.

A-1.2 | For State Transportation Network (STN) operations analysis, please include the intersections of SR-1/SR-92 and SR-92/Main Street in the transportation study intersections. Because 40% of the trips generated from the Project will be to/from the East via SR 92 and 48% will be to/from the North via SR-1, these intersections should be included as study intersections and not a study segment.

A-1.3 | Since the study intersections are closely spaced together, analysis of the study intersections should be conducted using Synchro/Sim-Traffic software. Performing the analysis alone in Synchro will only give you the results of the intersections as isolated intersections. Any queue spillback from upstream intersections will not be included with just Synchro and would not give us a proper indication of the traffic conditions within the study area. Analysis of the 95% queues reported should come from the Sim-Traffic report and be included in the Appendix.

Additionally, all scenarios (Existing, Existing plus Project, Background, Background plus Project, Cumulative, Cumulative plus Project) should include 95% queues and available storage capacities to determine if queues are spilling back into upstream intersections. This should be done for all the study intersections legs and per movement within those legs.

A-1.4 | Where 95% queues are found to exceed storage limits and/or spill to upstream intersections with Project, mitigation measures need to be provided to reduce its impact on State facilities.

Since study intersection #8 (SR-1/S. Main St.) is a stop-controlled intersection, include the worse approach in Table 4.15-10, 4.15-11, 4.15-13, 4.15-14. This was done for Table 4.15-9 (Existing plus Project), but not for the additional scenario tables.

Tables 4.15-9, 4.15-10, 4.15-11, 4.15-13, 4.15-14 should include 95% queues and storage capacities per direction per movement. Since AM peak, PM peak and Weekend Peak may all have different peak directions, operations for one direction could be

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A-1.4 Cont. | significantly worse than the other off-peak direction of the intersection. Seeing these metrics per direction per movement gives us a better understanding of the transportation operations at the intersections.

Mitigation Strategies

With the enactment of Senate Bill (SB) 743, Caltrans is focused on maximizing efficient development patterns, innovative travel demand reduction strategies, and multimodal improvements. For more information on how Caltrans assesses Transportation Impact Studies, please review Caltrans' Transportation Impact Study Guide ([link](#)).

A-1.5 | To further mitigate this project's VMT impacts, Caltrans strongly supports the construction of the Class Bike II lane and recommends fair share contributions. In Appendix H: Traffic Impact Study, the Executive Summary states that a *Class II bike lane* will connect South Main Street and Seymore Street. Other project documents mention a Class I Multi-Modal path, rather than a Class II. However, the Half Moon Bay Bicycle and Pedestrian Master Plan (2019) calls for a Class II bike lane on Main Street proper, in addition to a Class I along Highway 1. Caltrans strongly supports the construction of this Class II bike lane on Main Street, in addition to the proposed Class I within the 100-foot wetlands buffer. This would further achieve Half Moon Bay's stated vision for active transportation and support Caltrans' vision for a unified multi-modal active transportation network accessible to all users.

Furthermore, Caltrans supports and encourages the TDM measure that proposes reduced nightly rates/parking rates for guests/employees without private vehicles, and the on-site bike share service complete with bicycle helmets and locks free of charge. As noted, these offerings will be most effective only if they are advertised prominently, often, and communicated in advance.

Using a combination of these strategies that are appropriate to the project and the site, these can reduce VMT, along with related impacts on the environment and State facilities. TDM programs should be documented with annual monitoring reports by a TDM coordinator to demonstrate effectiveness. If the project does not achieve the VMT reduction goals, the reports should also include next steps to take to achieve those targets.

Please reach out to Caltrans for further information about TDM measures and a toolbox for implementing these measures in land use projects. Additionally, refer to the California Air Pollution Control Officers Association (CAPCOA) Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity ([link](#)).

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Lead Agency

- A-1.6 As the Lead Agency, the City of Half Moon Bay is responsible for all project mitigation, including any needed improvements to the STN. The project's fair share contribution, financing, scheduling, implementation responsibilities and lead agency monitoring should be fully discussed for all proposed mitigation measures.

Equitable Access

- A-1.7 If any Caltrans facilities are impacted by the project, those facilities must meet American Disabilities Act (ADA) Standards after project completion. As well, the project must maintain bicycle and pedestrian access during construction. These access considerations support Caltrans' equity mission to provide a safe, sustainable, and equitable transportation network for all users.

Encroachment Permit

- A-1.8 Please be advised that any permanent work or temporary traffic control that encroaches onto Caltrans' Right of Way (ROW) requires a Caltrans-issued encroachment permit. As part of the encroachment permit submittal process, you may be asked by the Office of Encroachment Permits to submit a completed encroachment permit application package, digital set of plans clearly delineating Caltrans' ROW, digital copy of signed, dated and stamped (include stamp expiration date) traffic control plans, this comment letter, your response to the comment letter, and where applicable, the following items: new or amended Maintenance Agreement (MA), approved Design Standard Decision Document (DSDD), approved encroachment exception request, and/or airspace lease agreement. Your application package may be emailed to D4Permits@dot.ca.gov.

Please note that Caltrans is in the process of implementing an online, automated, and milestone-based Caltrans Encroachment Permit System (CEPS) to replace the current permit application submittal process with a fully electronic system, including online payments. The new system is expected to be available during 2022. To obtain information about the most current encroachment permit process and to download the permit application, please visit <https://dot.ca.gov/programs/traffic-operations/ep/applications>.

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Jill Ekas, Director
September 6, 2022
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Thank you again for including Caltrans in the environmental review process. Should you have any questions regarding this letter, or for future notifications and requests for review of new projects, please email LDR-D4@dot.ca.gov.

Sincerely,



MARK LEONG
District Branch Chief
Local Development Review

c: State Clearinghouse

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Response to Commenter Letter A-1: California Department of Transportation

A-1.1 The project would include a TDM program, which is described in Appendix H, Traffic Impact Study (pages 35 through 38 of the Draft EIR). The TDM will have the performance continually monitored and adjusted as necessary to ensure its success. Mitigation Measure TRA-1, in Section 4.15, Transportation and Traffic, of the Draft EIR, requires the ongoing monitoring of the TDM measures with a designated hotel Transportation Coordinator who will provide an annual report to the city allowing for adjustment and improvement as the measures are implemented to mitigate the project generated VMT.

As described in Section 4.15, Transportation and Traffic, of the Draft EIR, three categories of trips that were used to evaluate Original Project generated VMT (employee trips, guest trips to and from the airport, and local guest trips). Local guest trips refer to the trips that a guest would make once they have arrived at the hotel. The average local guest trip was determined to be four miles. The number of local guest trips was estimated based on the number of round trips for 129 rooms with an average occupancy of 77 percent and an average of 2.5 days per stay. Guest trips to and from the airport were determined using the average distance traveled between the project site and the two nearest commercial airports (SFO and SJC). For the purposes of this analysis, the 29 miles per guest estimate is reasonable because guests would travel to and from the airport in several ways, including carpooling, driving alone, rideshare service, and/or shuttle.

A-1.2 The intersections of SR-1/SR-92 and SR-92/Main Street are included as study intersections #1 and #2 in Section 4.15, Transportation and Traffic, of the Draft EIR. The intersection level of service results at these intersections are listed in Tables 4.15-9, 4.15-10, 4.15-11, 4.15-13 and 4.15-14 of the Draft EIR.

A-1.3 The level of service analysis was conducted using Synchro analysis software and is consistent with both County of San Mateo Traffic Impact Study requirements and C/CAG Transportation Impact Analysis Policy. Evaluation of traffic operational effects associated with queue lengths at intersections is not a required element of a CEQA transportation impacts analysis, however, but is included in the Draft EIR for informational purposes because it is required by City policy (LCLUP Policy 3-38 Level of Service).

A-1.4 See response to Comment A-1.3. The intersection of SR-1/South Main Street is no longer stop-controlled because it was signalized in 2021.

As explained above, the level of service analysis was conducted using Synchro analysis software and is consistent with both County of San Mateo Traffic Impact Study requirements and C/CAG Transportation Impact Analysis Policy. Further, it is noted that the evaluation of traffic operational effects associated with queue lengths at intersections is not a required element of the CEQA evaluation process and as such is not included in Hyatt Place Project Draft EIR.

Therefore, it is not appropriate to show the worst approach results at signalized intersections and does not need to be added to Tables 4.15-10, 4.15-11, 4.15-13, 4.15-14.

A-1.5 The city appreciates recommendations from Caltrans regarding multi-modal circulation and TDM strategies.

As shown in Figure 4.15-3 in Section 4.15, Transportation and Traffic, of the Draft EIR, the City has identified and recommended implementation of a Class II Bike Lane adjacent to the project site along Main Street. This recommendation was identified in the Half Moon Bay Final Bicycle and Pedestrian Plan (2019). The recommended Class II Bike Lane is a separate endeavor and is not proposed as part of the Hyatt Place Project. The Half Moon Bay Hyatt Place Project does include a Class I Multi-Modal path which would be located between SR-1 and the hotel buildings. The bicycle path would be generally parallel with SR-1 and connect South Main Street with Seymour Street and would be a segment in the future Eastside Parallel Trail. The City has also hired an urban design firm to lead a streetscape master plan project for Main Street. Downtown routing for the Class II Bike Lane will be determined throughout that project.

Please see Response to Comment A-1.1 for a discussion of the TDM program suite.

A-1.6 A Mitigation Monitoring and Reporting Program (MMRP) was prepared to ensure that mitigation measures included in the Draft EIR are enforceable as conditions of approval. The MMRP includes a description of implementation and timing, monitoring responsibility, and verification of implementation of all mitigation measures that are adopted at the time of project approval. The City has adopted development impact fees that are intended to fund capital improvement projects with project contributions based on land use and scaled to project size. The City's fees will apply to the approved project.

A-1.7 The project site does not currently include any bicycle or pedestrian facilities, and no bicycle/pedestrian access would be affected during construction. The new sidewalk along Main Street and enhanced bicycle and pedestrian access would meet ADA Standards and ultimately further the goals of ADA.

A-1.8 Construction work will comply with the Caltrans encroachment permit process.

Comment Letter A-2, California Coastal Commission

STATE OF CALIFORNIA — NATURAL RESOURCES AGENCY

GAVIN NEWSOM, GOVERNOR

CALIFORNIA COASTAL COMMISSION

NORTH CENTRAL COAST DISTRICT
455 MARKET STREET, SUITE 300
SAN FRANCISCO, CA 94105
PHONE: (415) 904-5260
FAX: (415) 904-5400
WEB: WWW.COASTAL.CA.GOV



September 9, 2022

Hyatt Place EIR
ATTN: Jill Ekas
City of Half Moon Bay
Community Development Department
501 Main Street, Half Moon Bay, CA 94019

Subject: Draft Environmental Impact Report for the Half Moon Bay Hyatt Place Project

Dear Ms. Ekas:

Thank you for the opportunity to comment on the above-referenced Draft Environmental Impact Report (DEIR) for the Half Moon Bay Hyatt Place Project located at the southern entrance to downtown Half Moon Bay along State Route 1. The proposed project includes the construction of a 90,784 square-foot hotel on a 5-acre parcel and would include up to 129 guest rooms as well as supporting facilities including a board room, lobby and lounge area, swimming pool, fitness area, and a meeting room/multipurpose room. Up to 148 parking spaces would be provided, with at least 129 parking spaces dedicated for hotel guests. The hotel would be varying heights, up to a maximum of 35 feet. The western portion of the property is proposed to be maintained as an open space area with the addition of an off-street bike path.

Since publication of the DEIR, the applicant has made clear that they wish to pursue Alternative 2, "Reduced Intensity" project (reduces the square footage of the structures from 90,784 square feet to 66,784 square feet, reduces the number of rooms to 102, reduces the length of the property from 608 feet to 452 feet, and includes other "reduced intensity" reductions and alterations in height, landscaping, and amenities; in addition requires lot line adjustment on the 5.02-acre parcel, adding 0.61 acres to an adjacent parcel containing an auto dealership and using the resulting 4.41 acres for the reduced-size hote, which will create additionnal parking for the dealership, allowing for the creation of an 8-lot subdivision in a 1.15-acre parcel that is currently being used as dealership parking), as laid out in the DEIR in Section 5.5.2. This decision was made upon consultation with City staff and upon further feedback provided through public hearings and at some point in the future may allow for affordable housing.

Since it is Staff's understanding that the applicant is now pursuing Project Alternative 2 of the Draft EIR, the comments below are intended to address the potential impacts of this alternative, not of the original project.

Half Moon Bay Hyatt Place Project DEIR Comments (September 9, 2022)**Page 2**

A-2.1 **1. Subdivision in Wetland Buffers.** In Alternative 2 of the draft EIR, the applicant states that if the 1.15-acre site was subdivided as proposed, it would result in a new parcel that falls within the 100-foot buffer required by the LCP for the identified seasonal wetlands. Mitigation Measure BIO-4a on page 5-31 proposes a revised subdivision to keep parcels from intruding into the 100-foot buffer. However, given the size constraints and shape of the parcel as illustrated in Figure 5-1, it is difficult to see how the subdivision would be revised to accommodate the required 100-foot buffer. Please provide more details on how this subdivision would be planned, including a preliminary site layout of the subdivision that accommodates this buffer.

A-2.2 **2. Conversion of Agricultural Land.** The 5.02-acre site was previously used as agricultural land, but according to a review of historic aerial imagery performed by the applicant has not been actively used for agricultural activities since 2013. The project site is also sited within the "Town Center" area as designated by the certified Half Moon Bay Local Coastal Plan-Land Use Plan (LCP-LUP). The "Town Center" is an area of high residential and commercial density described in Chapter 2 of the LUP as an area where future development should be concentrated. As such, the LCP permits the conversion of agricultural land within the "Town Center", with Policy 4-9 "Conversion of Prime and Non-Prime Agricultural Land" stating:

"Conversion of prime and non-prime agricultural land within the Town Center shall be permitted for anticipated urban development..."

However, Policy 4-9 is supplemented by Policy 4-10 "Mitigation for Conversion of Agricultural Lands" which requires mitigation for agricultural land conversion as follows (emphasis added):

"All conversions of prime and non-prime agricultural lands to a new non-agricultural use, excluding farmworker housing, agricultural compatible uses, and supplemental uses as defined in this chapter such as habitat restoration and recreation, shall be mitigated at a ratio to be established based on the quality of agricultural lands converted, their location, and other relevant factors as evaluated in a report prepared by a qualified professional for the City's review and approval. Methods for mitigation may include but are not limited to establishing agricultural conservation easements, soil restoration, or in lieu fees in partnership with land trust and conservation agencies. Protection or restoration of agricultural lands within city limits is preferred; followed by lands within the coastal zone of unincorporated San Mateo County and finally by other coastal zone areas."

Therefore, the City should require a report prepared by a qualified professional and approved by the City that assesses and recommends appropriate mitigation, and ratios for the same, for the loss of the 5.02 acres of agricultural land. Any

Half Moon Bay Hyatt Place Project DEIR Comments (September 9, 2022)

Page 3

A-2.2 | recommendations for mitigation should then be incorporated into the City's
Cont. | required permit conditions for the proposed project.

A-2.3 | **3. Visual Impact.** The proposed development has several impacts to visual resources in the area. The project site is adjacent to Highway 1, which is not officially designated as a scenic corridor in the LUP, but is described in the LUP as providing "a large share of the visual impression of the City." In addition, Highway 1 contains long-range views of the ridgelines north and east of the project location. As a result, the DEIR states that the City has expressed intent to treat Highway 1 corridor as a visual resource area. In addition, the project is located at the southern entrance of the City of Half Moon Bay and is essentially the gateway to the downtown area. Therefore the project has a greater potential to impact the character of the surrounding area and the first impressions of the City. The selection of Alternative 2 addresses many of these concerns by increasing the setbacks from Highway 1, the Southern Gateway, and Main Street, both reducing the impact to the view of the ridgelines from Highway 1, and the view of the proposed hotel from the southern entrance to the City. In addition, based on communication with the applicant, and from the option presented in the August 9th, 2022 Half Moon Bay Planning Commission Meeting by the project architect, Staff understands that the applicant intends to further break up the building massing, roughly doubling the space between the two proposed buildings to further reduce the impact on view lines inland from Highway 1. Staff is supportive of the selection of Alternative 2 and the planned design changes. Per LUP Policy 9-6 "Site Planning and Design for New Development", please ensure that the development is sited and designed to protect and be visually compatible with the character of the surrounding area, particularly with respect to the view from the southern entrance of Half Moon Bay as shown in Viewpoint 2 in Figure 5-9 of the DEIR.

A-2.4 | **4. Lower-cost Visitor Serving Accommodation.** LUP Policy 5-71, "Inclusion of Lower-Cost Accommodations" states:

"Require new development of higher-cost accommodations and/or new development that would fail to provide lower cost accommodations on land where that use is allowed and suitable to provide lower-cost accommodations (e.g. a lower-cost bank of rooms in a hotel, a hostel, campground, cabins, etc.). The lower-cost accommodations may be provided as listed in order of priority as follows: on-site, off-site, or through payment of an in-lieu fee fund to support establishment of new lower-cost accommodations in the coastal zone. The provision of lower-cost accommodations shall equate to 15 to 25 percent of the number of approved high-cost accommodations in consideration of the price range of the proposed lodging options and provision by the development of other low-cost public access and recreation benefits such as airport shuttles, bicycle rentals, or trail connections. Require full replacement of any existing low-cost rooms proposed for conversion to high-cost rooms."

Half Moon Bay Hyatt Place Project DEIR Comments (September 9, 2022)
Page 4

A-2.4
Cont. | As such, please ensure lower-cost visitor-serving accommodation is incorporated into the project design and provide the analysis that establishes the final provision of accommodation. This analysis should include the reasoning behind determining the final percentage of accommodation provided (between 15 and 25 percent), and the process behind determining the final cost of the rooms provided as lower-cost accommodation. Staff have been in communication with the applicant on this process and are happy to provide additional support if needed.

A-2.5 | **5. Tribal Consultation.** The DEIR makes several recommendations regarding the protection of potential archeological and cultural resources. In addition, the Coastal Act and LUP also require adequate Tribal Consultation for projects with potential to impact such resources. Per the Commission's Tribal Consultation Policy (TCP) adopted August 8, 2018, the Commission has committed to early and effective communication with the Tribes and Tribal Nations of California. A copy of the Commission's TCP may be found on the Commission's website at <https://www.coastal.ca.gov/env-justice/tribal-consultation/>. The City should require the project applicant to reach out and coordinate with tribes who may be culturally connected to the project area, in order to address any concerns the tribes may have regarding the proposal. Please let Commission Staff know if you would like a list of tribes with potential cultural connections to the project area.

Thank you again for the opportunity to comment on the DEIR for this project, and for continuing to coordinate closely with Commission staff. Please do not hesitate to contact me if you have any questions.

Sincerely,

Peter Benham

Peter Benham
Coastal Planner
North Central Coast District
California Coastal Commission

cc: State CEQA Clearinghouse (SCH # 2018032059)
Greg Jamison, RGJC South, LLC, Half Moon Bay, CA (Applicant)

Response to Commenter Letter A-2: California Coastal Commission

A-2.1 Figure 5-1 in Draft EIR Chapter 5.0, Alternatives, includes a conceptual layout for development of the subdivision included in Alternatives 2 and 3. Following circulation of the Draft EIR, the applicant submitted revised plans to the City indicating that Alternative 2 (with revisions), is now the Proposed Project that would be considered for approval. This Proposed Project is described in the Final EIR as Modified Alternative 2. Modified Alternative 2 conforms with LCLUP Policy 6-57 because all proposed parcels can be developed without encroachment into a designated ESHA area or a required ESHA buffer. Please see Topical Response 5, Modified Alternative 2 regarding modifications to wetland buffers.

A-2.2 Chapter 4.2, Agricultural Resources, of the Draft EIR provides a discussion of the Original Project's consistency with LCLUP Policy 4-10. The approximately 5-acre project site is mapped for Prime Soils for San Mateo County (Figure 4.2-1). Approximately 2 acres of the site are or would be devoted to wetlands, wetland buffers, and/or restoration in association with wetlands. The Original Project is therefore required to compensate for the loss of about three acres of prime agricultural soils which can be accomplished through a variety of ways. The applicant has provided a detailed proposal for how Modified Alternative 2 will address mitigation for the conversion of agricultural land through payment of in-lieu fees in accordance with the Half Moon Bay LCLUP Policy 4-10.

Based on the limited size of the parcel and its isolated context, a Land Evaluation and Site Assessment (LESA) was prepared as part of the Draft EIR to make determinations of the potential significance of a project's conversion of agricultural lands. Based on the LESA worksheet (Appendix B), the parcel scored a 36. LESA scores of 39 or less are "not considered significant." The Original Project is aligned with the California Coastal Act (CCA) and would not be considered significant using the California Agricultural LESA Model; therefore, the Original Project would have a less than significant impact to the conversion of existing agricultural lands.

The loss of prime agricultural soils, however, within Half Moon Bay and San Mateo County is considered a significant cumulative impact because it would result in loss of a non-renewable resource when considering the development of the project in conjunction with other projects. Consistent with Policy 4-10, the project applicant will mitigate for the loss of prime soils by supporting the San Mateo Resource Conservation District or other City approved means of providing agricultural land protections or soils restoration. Policy 4-10 states that all conversions of prime and non-prime agricultural lands to a new non-agricultural use, excluding farmworker housing, agricultural compatible uses, and supplemental uses as defined in the Half Moon Bay Local Coastal Land Use Plan such as habitat restoration and recreation, shall be mitigated at a ratio to be established based on the quality of agricultural lands converted, their location, and other relevant

factors as evaluated in a report prepared by a qualified professional for the City's review and approval. Methods for mitigation may include but are not limited to establishing agricultural conservation easements, soil restoration, or in lieu fees in partnership with land trust and conservation agencies. Protection or restoration of agricultural lands within city limits is preferred; followed by lands within the coastal zone of unincorporated San Mateo County and finally by other coastal zone areas. Therefore, the loss of 3.05 acres of prime agricultural soils associated with the Original Project is not a considerable contribution to a significant cumulative impact to loss of agricultural uses and prime soils for the City and San Mateo County coastal agricultural operations.

A-2.3 Please see Topical Response 2, Aesthetics, regarding impacts to scenic segments of Highway 1 and LCLUP consistencies.

Alternative 2 and Alternative 3 were designed to minimize aesthetic and visual impacts associated with the Original Project. Both Alternatives would reduce the overall massing of the Original Project, and substantially increase building setbacks from the southern gateway, Main Street, and SR-1. Following circulation of the Draft EIR, the applicant submitted revised plans to the City indicating that Alternative 2 (with revisions), is now the Proposed Project that would be considered for approval. This Proposed Project is described in the Final EIR as Modified Alternative 2. Modified Alternative 2 would reduce degradation of existing visual character or quality of the site and its surroundings due to view blockage compared to the Original Project. Please see Topical Response 5, Modified Alternative 2 regarding visual impacts.

A-2.4 The Original Project was found to be consistent with LCLUP Policy 5-71 (See Chapter 4.13, Population and Housing, Table 4.13.3). The proposed hotel would offer new accommodations and would not replace any existing low-cost rooms. The Original Project is providing bicycle rentals and a new trail segment. City permitting will review the project's provision of public benefits to ensure compliance with this policy in collaboration with the California Coastal Commission staff. In comparison to Alternative 2, Modified Alternative 2 provides a detailed proposal for how this alternative will address the provision of lower-cost visitor accommodations with a combination of lower-cost rooms and no-cost visitor-serving amenities available to the public in accordance with the Half Moon Bay LCLUP Policy 5-71.

A-2.5 As described in Section 4.5, Cultural Resources, of the Draft EIR, several outreach efforts were undertaken in an effort to solicit feedback from tribes. The Native American Heritage Commission (NAHC) was contacted on July 20, 2017, by email to request information on known Native American traditional or cultural properties within the project site, and to request a listing of individuals or groups with cultural affiliation to the

project site. The NAHC Sacred Lands File (SLF) results came back negative, indicating that there are no tribal and cultural resources in the project vicinity. Included in the NAHC response was a list of Native American contacts that the NAHC recommended to contact for further information, as required by CEQA Section 21080.3.1. On August 2, 2017, letters were sent to the listed tribal members of the Ohlone/Costanoan, Bay Miwok, Plain Miwok and Patwin Tribes requesting information on traditional or cultural properties within the project site. Follow up phone calls were made to the Native American contacts on August 14, 2017, and August 25, 2017. Two contacts from the Ohlone/Costanoan Tribe requested that a Native American monitor be present during earthmoving (see Mitigation Measure CUL-1). Andy Galvan, on behalf of the Ohlone Indian Tribe, had no concerns at this point in the project. Messages were left for Anne Marie Sayers, and the message box for Rosemary Cambra was full. A summary of this correspondence can be found in Table 4.5-2.

Comment Letter A-3, Midpeninsula Regional Open Space District

**FROM 50 TO FOREVER: CARING FOR THE LAND THAT CARES FOR US**

By creating Midpen 50 years ago, our community prioritized clean air and water, healthy habitats for diverse native plants and animals, ecosystems that are resilient to the effects of our changing climate, and places for people to connect with nature — that's what Midpen provides in perpetuity.

Celebrate with us all year long at [openspace.org/50-years!](https://openspace.org/50-years/)

September 12, 2022

City of Half Moon Bay Community Development Department
ATTN: Jill Ekas
501 Main Street, Half Moon Bay, CA 94019
Email: HyattHotel@hmbcity.com

**SUBJECT: File Number: 2018032059, Draft Environmental Impact Report
Location: Half Moon Bay (APN 065-012-030)**

Dear Ms. Ekas,

On behalf of the Midpeninsula Regional Open Space District (District), I appreciate the opportunity to comment on the proposed Hyatt hotel development project (Project) located in Half Moon Bay (File No. 2018032059) and associated draft Environmental Impact Report (EIR), which is circulating for public review and comment until September 13, 2022.

The District owns and manages nearly 65,000 acres of open space land in the Santa Cruz Mountains region. Our mission for the San Mateo County coastside area is:

To acquire and preserve in perpetuity open space land and agricultural land of regional significance, protect and restore the natural environment, preserve rural character, encourage viable agricultural use of land resources, and provide opportunities for ecologically sensitive public enjoyment and education.

The project site is located just over three miles from the Purisima Creek Redwoods Open Space Preserve and less than half a mile from the future Johnston Ranch property, located south of Main Street and east of Highway 1. As part of our mission, we strive for preserving the rural character of the San Mateo coastside area, where scenic resources like viewsheds are important to protect. Overall, the proposed project would bring additional visitors to the coastside community, where existing and planned District open space preserves and trails will provide nearby open space and recreational amenities that visitors and guests of the new hotel development would be able to access and enjoy in the future.

The District would therefore like to provide the following comments on the proposed project and draft EIR.

CEQA Draft Environmental Impact Report:

- A-3.1
- 1) Aesthetics
- The draft EIR states that the project will have significant, unavoidable impacts to aesthetics as it relates to obstructing scenic views of the upland slope hills and ridgelines from the surrounding area as well as from State Route 1 (Highway 1). Highway 1 is a locally designated scenic corridor and development of the proposed project would impact the protected long range ridgeline views from this scenic corridor, as identified in the City of Half Moon Bay's Local Coastal Program and Land Use Plan.
- The District recommends the planting of native vegetation in the area surrounding the proposed project to screen views of the hotel from both Highway 1 and the nearby Naomi Partridge Trail on the west side of Highway 1, which provide the most direct views of the project site. Given the location of the site along a local scenic corridor and its proximity to surrounding open space lands, vegetation should be carefully selected, ensuring that the species are locally native to prevent the further spread of invasive or exotic plants. The District further recommends that any new plantings be arranged in a natural and clustered arrangement to prevent a "manicured" and unnatural look that is characteristic of linear row plantings.
- At the August 9, 2022 Planning Commission meeting for the City of Half Moon Bay, a suggestion was made by the project consultant to further investigate additional building separation in the Alternative 2 site plan by expanding the "Glazed Connector" to create a 32-foot separation between the buildings instead of a 16-foot separation. The District supports this effort to provide greater separation between the buildings to mitigate impacts to views from the project, which should be further analyzed in the EIR. Given the District's mission, we respectfully request that the project further evaluate alternative designs to reduce the impact to the scenic view shed to the greatest extent possible.
- A-3.2
- 2) Wetlands and Biological Resources
- Seasonal wetlands are located within the project site and could potentially be visited by two special-status species: the California red-legged frog and the San Francisco garter snake. Although these species are not anticipated to occur within the project site, the District agrees with the recommended mitigation measures to prevent potential impacts to these species, including a pre-construction survey, worker environmental awareness program, exclusion barriers, biological monitoring, and prevention of entrapment. These mitigation measures should be implemented regardless of the selected development scenario. The project will also include a 100-foot buffer between the wetlands and a majority of the developed area. The project should maximize the distance between the onsite wetlands and developed area to the greatest extent possible to avoid any potential impacts to existing plant species and to wildlife that may visit the onsite wetlands.
- The District recommends the use of native, local tree species in place of the non-native New Zealand Christmas trees and strawberry trees proposed to be planted along the Main Street entrance of the site. The District requests that no invasive species be planted onsite, including any ornamental plants and landscaping elements. Information regarding alternatives to invasive species is provided by the organization Plant Right (<https://plantright.org/>) and can be found at https://plantright.org/wp-content/uploads/2019/10/2019-PlantRight_Plant-List.pdf. Construction and grading for the project could result in the proliferation of invasive plants at the site and,

A-3.2
Cont. | therefore, the District also requests that management or removal of invasive weeds be included as a mitigation measure for all disturbed areas in addition to the areas located within the avoided wetland.

A-3.3 | 3) Multimodal Access
The District supports the project’s bicycle and pedestrian trail that will run parallel to Highway 1. This bike and pedestrian access would provide important connections from the site to other bike and pedestrian pathways and trails in Half Moon Bay and encourage non-vehicular modes of transportation for guests and visitors of the hotel. The District supports providing public bike and pedestrian access through the project site and recommends that signage be included to indicate that the pathway is a public access route. Bike and pedestrian pathways at the site should be designed to encourage public use and incorporated into every development alternative discussed in the EIR. The District is also supportive of the on-site bicycle rental and airport shuttle services, which would also encourage non-vehicular transportation for hotel users as well as reduce vehicle congestion at and around the site.

A-3.4 | 4) Nearby District Open Space and Recreational Uses
The District is in the process of acquiring a new property in the vicinity of the project site, referred to as the [Johnston Ranch property](#). This property is located less than half a mile east of the project site and, once opened to the public, will generate greater visitation of hikers, bicyclists, and equestrians in the vicinity of the project site. The District’s vision for public access at the Johnston Ranch Property will include a future loop trail near the Johnston House, as well as provide the first opportunity for public access to the adjacent Miramontes Ridge Open Space Preserve and connections to existing trails in the adjacent Burleigh Murray Ranch State Park. Purisima Creek Redwoods Open Space Preserve is also located just over three miles from the project site and is a frequently visited preserve by residents of Half Moon Bay and from around the San Francisco Bay Area. These regional open space areas are especially popular given their close proximity to communities such as downtown Half Moon Bay and other coastal areas.

Although Purisima Creek Redwoods currently provides a limited number of vehicle parking for trail users and the existing parking area at Johnston Ranch which is envisioned to provide future trailhead parking area may also have limited parking, it is likely that parking areas will reach capacity during peak visitation (such as weekends and summers) such that non-vehicular modes of transportation are highly encouraged and supported by the District to access these preserves. In addition, the District is developing a [Multimodal Access Study for the Purisima Creek Redwoods Preserve](#), which will recommend the implementation of various transportation demand management strategies that aim to eventually reduce vehicular and parking congestion and better manage visitation at this preserve. Therefore, the EIR should consider the potential impacts of the project on the current and planned recreational uses at the District’s preserves in anticipation of a likely increase in recreational activities and visitors near the project. The EIR should also consider the impacts of the project on a future increase in multimodal circulation through and around the site and ensure that the EIR will address any traffic congestion associated with the hotel development on nearby roadways, such as Highway 1 and Higgins Canyon Road, that may pose potential circulation and safety issues for visitor access to the Johnston Ranch property, which currently provides public parking, picnic tables and restrooms, and access for the historic Johnston Ranch house. The EIR should also consider multimodal access connections from the project’s proposed bike and pedestrian improvements to the Johnston Ranch property.

We appreciate the opportunity to comment on this Project. Should you have any questions about this letter, please contact Planner Brittany Wheatman at (650) 772-3646, or bwheatman@openspace.org.

Sincerely,



Jane F. Mark, AICP
Planning Manager

CC: Ana Ruiz, General Manager
Susanna Chan, Assistant General Manager
Midpen Board of Directors

Response to Commenter Letter A-3: Midpeninsula Regional Open Space District

A-3.1 Please refer to Topical Response 2, Aesthetics, regarding impacts to scenic views, vistas, and corridors.

Regarding landscaping and site amenities, as described in Section 3.0, Project Description, of the Draft EIR, a Class I multi-use path is proposed to be constructed from the southern boundary of the project site and connect to Seymour Street to the north. Park benches and educational signage describing features of the area would be installed along the multi-use path. Landscaping east of the multi-use path would contain native plantings and bioswales designed to integrate with the wetlands. This area would include a walking path comprised of pervious surface materials which would provide connections to the bicycle and pedestrian path and provide access allowing for maintenance of this area. Implementation of the project's landscape plan would enhance the scenic quality of the project site from surrounding viewpoints, including from the Naomi Partridge Trail and from SR-1.

Following circulation of the Draft EIR, the applicant submitted revised plans to the City indicating that Alternative 2 (with revisions), is now the Proposed Project that would be considered for approval. This Proposed Project is described in the Final EIR as Modified Alternative 2. Modified Alternative 2 conforms with LCLUP Policy 6-57 because all proposed parcels can be developed without encroachment into a designated ESHA area or a required ESHA buffer. Please see Topical Response 5, Modified Alternative 2 regarding modifications to planned wetland buffers.

A-3.2 The District's support of Mitigation Measures for the California red-legged frog and San Francisco garter snake is noted, which apply to all the alternatives as well as the Original Project.

As described in Section 4.4, Biological Resources, of the Draft EIR, the design of the Original Project avoids the wetlands on site by the incorporation of a 1.95-acre buffer between the new structures along the western side of the site plan. Mitigation Measure BIO-2a and 2b, would be implemented to avoid impacts to wetlands, by establishing permanent 100-foot buffers between developed components of the Original Project, other than uses allowed in wetland buffers (e.g. wetland restoration, green infrastructure, and public access pathways), and the identified jurisdictional wetland areas. Temporary ground disturbance during project construction, including for the establishment of the wetland restoration area would occur but will require oversight by the project biologist with respect to plan review and monitoring if needed. This oversight, in compliance with LCLUP Policy 6-8, will be ensured through the implementation of mitigation measures MM BIO-1a-1e, which are designed to protect wetlands from significant disruption.

To achieve the goal of restoration of wetland habitat functions, the City will consult an invasive species list to ensure compliance with LCLUP Policy 6-92, which prohibits planting such species before approving landscape plant materials. Furthermore, in the final review of the planting plan, staff will ensure that the plan includes only species suited to the coastal climate, which are then also carefully reviewed for potential impacts on the surrounding utilities and structures. The landscape concepts to the west side are wetland and native oriented. The landscape concepts to the east side are related to the development of Main Street. According to the Impact BIO-4, of the Draft EIR, heritage trees, located on Main Street, if permitted for removal must be replaced on a one-for-one basis with a minimum 24-inch box specimen tree that is approved by the Community Development Department. The District's recommendation for native tree plantings is noted. Pursuant to Standard Condition BIO-4, the percent cover of non-native species and invasive plant species with a Cal-IPC Inventory rating of High will not exceed 5 percent at any time during the 5-year monitoring period, respectively.

A-3.3 The District's support of the proposed Multi-Modal path is noted. A Multi-Modal path is included in the design for each development Alternative considered in Chapter 5.0, Alternatives of the Draft EIR.

A-3.4 As described in Section 4.14, Public Services and Recreation, of the Draft EIR, local and regional planning documents along with independent research on relevant regional parks or recreational facilities were used to guide the project's impact analysis. The Johnston Ranch property was not described in cited planning documents or discovered during independent research of relevant regional parks, and therefore was not known or considered in the project-level or cumulative analysis of the project's impacts to recreational facilities. However, the analysis conducted for the project considered foreseeable future projects. As explained in Section 4.14, Public Services and Recreation, future impacts on park facilities would be partially mitigated through the collection of park facilities fees for most new residential development and the provision of parkland as allowed under the Quimby Act and the City's policies. Additionally, the Original Project would comply with policies of the General Plan intended to improve connections between existing and planned bicycle and pedestrian trails. Please Chapter 3.0, Text Revisions of the Final EIR for inclusion of the Johnston Ranch Property and the Multimodal Access Study for the Purisima Creek Redwoods Preserve.

Regarding vehicular congestion, the Draft EIR evaluated the change in intersection and roadway levels of service within the study area including SR-1 and the SR-1/South Main Street intersection. The Original Project would also include the construction of new sidewalks and pedestrian pathways in the immediate vicinity of the site including a portion of the area between the Johnston Ranch property and the project site. Hotel guests may choose to walk or ride a bike to the property since the Johnston Ranch is

within a relatively short distance (1,800 feet) of the proposed hotel. Multimodal transportation modes in the study area are discussed in Appendix H, Traffic Impact Study, and Section 4.15.1, and pages 4.15-24, 4.15-25, 4.15-27 of the Draft EIR.

Business and Organization Comments

Comment Letter B-1, The Paper Crane

Public Comment - Post 08/09/22 Planning Commission Meeting

Hyatt Hotel Project

August 25, 2022 –September 13, 2022

From: The Paper Crane

Date: Tuesday 09/13/2022 9:26 AM

To: HyattHotel

Subject: Opposed to current Hyatt Place project proposal

Dear Members of the Hyatt Place Planning Committee:

B-1.1

As owner and operators of The Paper Crane, we would like to express our concerns about the Hyatt Place project. The scale and design of the proposed hotel are not in keeping with our historic Main Street, and would not create an inviting southern gateway to Half Moon Bay's downtown. The project creates guest lodgings that do not appear to be in demand, places additional strain on the infrastructure and roads, and creates jobs when there is already insufficient affordable housing in Half Moon Bay.

**Public Comment - Post 08/09/22 Planning Commission Meeting
Hyatt Hotel Project
August 25, 2022 –September 13, 2022**

B-1.2 | Though the hotel would provide guest lodgings within walking distance of downtown businesses, this is true only in a literal sense. From comments we hear from our customers, we suspect that few visitors are willing to walk close to a mile in order to shop and eat downtown, and then return to the hotel carrying full shopping bags. Most will drive the nine blocks and park downtown, just as they would from any other local hotel.

B-1.3 | Half Moon Bay has no shortage of lodgings, luxury or otherwise; as of a 2019 study, hotel occupancy stands at only 65%. The city needs more affordable housing for the people who currently work at local hotels and other service businesses. The Paper Crane endorses the Alternative 2 Plan in the EIR which would use the land for 20 units of residential housing, in an area of our city where there is a critical need for it, and which is along existing public transit corridors. We oppose the current planned hotel project.
Thank you for this opportunity to express our views and endorse the Alternative 2 Plan. We appreciate your attention to our concerns and your efforts to meet the needs of the community as well as of the land owner/ developer.

Sincerely,

Margaret, Robert, and Amber Stow
The Paper Crane
Half Moon Bay, CA 94019

Response to Commenter Letter B-1: The Paper Crane

B-1.1 Please see Topical Response 2, Aesthetics, regarding the project design and visual character. Additionally, please see Topical Response 5, Modified Alternative 2, regarding the housing portion of that alternative.

As described in Chapter 4.13, Population and Housing, the Original Project is consistent with LCLUP Policy 5-70, which requires that project proponents consider the carrying capacity of the coast, visitor demand over a range of affordability levels for various accommodation types, and consistency with the LCP, including all applicable LCLUP policies, before approving any new overnight accommodation development proposals. Table 4.13-3, Project Consistency with Relevant General Plan Policies, states that the project site located south of SR-92 is along a span of SR-1 where a 52-room hotel was recently converted to a homeless shelter. Past studies indicate that there is adequate visitor demand on the coast to support the proposed hotel. The Chamber of Commerce cites an average occupancy rate of 60 percent and a need for conference facilities that can support midweek hotel demand which is off-peak from the high weekend demand.⁵

B-1.2 As stated in Appendix H, Traffic Impact Study, of the Draft EIR, the TDM measures will be applied during construction and operation of the Original Project in order to reduce single-occupancy vehicle trips, parking demand, and total VMT through use of alternative modes of transportation and more efficiently planned trips. As part of the TDM measures, guests will be provided with information regarding transportation options to the hotel which can help encourage guests to consider non-auto or rideshare options. Information regarding the availability of shuttle service to the hotel and lower room rates for guests without cars would be highlighted to guests.

B-1.3 As described in Section 3.0, Project Description of the Draft EIR, the Original Project would be consistent with the City's project objective of meeting demand for branded and reasonably affordable hotel rooms to support Half Moon Bay's growing local tourist and agribusiness economies. Past studies indicate that there is adequate visitor demand on the coast to support the project. Furthermore, the Chamber of Commerce has also found a need for conference facilities to support mid-week hotel use, which is off-peak from the high weekend demand. The proposed hotel would be mid-range, featuring more amenities than a budget hotel, but would be lower in cost than a luxury hotel.

⁵ Half Moon Bay, 2023. *Hotel Business Improvement District 2023*. Available: <https://www.half-moon-bay.ca.us/DocumentCenter/View/5715/Hotel-BID-City-Presentation?bidId=>. Accessed: July 2024.

Please also see Topical Response 5, Modified Alternative 2. Notably, Alternative 2 and Modified Alternative 2, as described in this Final EIR, both include a hotel project and a residential component on a 1.15-acre site north of Seymour Street. Modified Alternative 2 also provides a detailed proposal for how this alternative will address the provision of lower-cost visitor accommodations with a combination of lower-cost rooms and no-cost visitor-serving amenities available to the public in accordance with the Half Moon Bay LCLUP Policy 5-71.

Individual Comments

Comment Letter: C-1, Melvin Mello Jr.

September 6, 2022

Hyatt Place EIR
ATTN: Jill Ekas
City of Half Moon Bay
Community Development Director
501 Main Street
Half Moon Bay, CA 94019

CITY OF HALF MOON BAY

SEP 13 2022

RECEIVED

Re Hyatt Place EIR

Dear Ms. Ekas and City of Half Moon Bay:

C-1.1

I am writing this letter in support of the plans for the Hyatt Place Hotel on the south end of Main Street in Half Moon Bay. As a life long resident I believe that adding a new hotel near to the downtown area would be a great asset to the Main Street merchants and community as a whole. In addition to providing additional lodging to tourist, it would also serve to bring more jobs and dollars to the community via tourism, dining and shopping in town.

The addition of the hotel would also bring new sidewalks and paths to the south end of Main Street, which have been needed for some time. Giving people a safe and attainable area to walk down Main Street.

The property owners have spent the last 6 years putting a great amount of time and research has been put into this project and foresee it adding a great benefit to our community.

Sincerely,



Melvin Mello, Jr.

Response to Commenter Letter C-1: Melvin Mello Jr.

C-1.1 This is not a comment on the adequacy or content of the environmental analysis in the EIR but is noted and will be provided to decisionmakers through the publication of this Final EIR.

Comment Letter: C-2, Ken King

Ken King - Tue 8/2/2022 5:29 PM

Dear Ms. Ekas,

C-2.1 I've followed the history of this project since it was proposed years back, but have withheld an opinion so long as it was a moving work in progress, and, of course, as a former Half Moon Bay Planning Commissioner, I hoped for the best. Now that it's coming together and ready to present to the public in its nearly-finalized details, I conclude it is an extremely odd building to place at the southern gateway to our quaint and charming city. Beside being noticeably out of character with our downtown, it appears to violate the parts of the LUP's visual resource code's spirit of protecting hillside views on Highway 1, whether that be for local residents, commuters, recreation seekers, or tourists. It may meet its technical height requirements by some few inches, but that's just playing a game through excision and elision of the code's intended purpose stated clearly in that document, which is to preserve the character of our city and its views, hillsides, as well as oceanic.

C-2.2 It is my opinion, and that of others I know, that the project fails in this regard, and should be seriously amended, or importantly, cancelled in favor of a more fitting project for this keystone setting.

Sincerely,

Ken King
633 Terrace Ave
HMB, CA 94019

Response to Commenter Letter C-2: Ken King

C-2.1 As explained in Table 4.1.1 in Section 4.1, Aesthetics, of the Draft EIR, the Original Project would be inconsistent with LCLUP Policy 9-23, which serves to protect broad views of upland slopes, prominent ridgelines, and other intervening ridgelines as viewed from scenic corridors. This assessment is also related to LCLUP Policy 9-12, which establishes view protections from the Town Boulevard. This was identified as an impact despite incorporation of the following design elements into the Original Project:

- Massing of the proposed 2- to 3-story high buildings is reduced with a dormer roof form and downward stepping the height towards the southern gateway corner at the South Main Street intersection with SR-1.
- Substantial setbacks from SR-1 reduce visual intrusions into the ridgeline from the SR-1 view including a sizable buffer of at least 100 feet between the proposed structures and SR-1 to avoid impacts to wetlands.

As concluded in Section 4.1, Aesthetics, of the Draft EIR, implementation of the Original Project would still obstruct long range views of the ridgeline, and the Draft EIR found that there is no other feasible measure that would reduce this impact to a less-than-significant level given the mass and scale of the Original Project. Therefore, this impact is considered significant and unavoidable. Modified Alternative 2 would reduce degradation of existing visual character or quality of the site and its surroundings due to view blockage compared to the Original Project. Please see Topical Response 5, Modified Alternative 2 for further discussions regarding aesthetic impacts and LCLUP policy consistency.

C-2.2 This is not a comment on the adequacy or content of the environmental analysis in the EIR but is noted and will be provided to decisionmakers through the publication of this Final EIR.

Comment Letter: C-3, Virginia M Turezyn

Virginia M Turezyn - Sat 7/30/2022 1:09 AM

Hi Jill,

C-3.1 | One thought regarding the proposed hotel. The plans keep changing so I'm not sure if a pool is still planned. If so, perhaps the owner could be asked if there could be use by the HMB community at certain times on Tuesday, Wednesdays and/or Thursdays (lighter occupancy periods). I know there have been fund raisers for a Community Pool and since I do not think sufficient funds have been raised this could be a benefit to the community and help lessen some of the resistance to any new development project. The Ritz parking for locals is working nicely now that the issue has been resolved. Having these resorts provide some amenities for local use could mitigate some of the adverse perspectives regarding their operations.
The smaller hotel and potential for additional housing stock seems reasonable.
Kind regards,
Virginia

Response to Commenter Letter C-3: Virginia M Turezyn

C-3.1 The Original Project would include up to 129 guest rooms and supporting facilities such as a board room, lobby and lounge area, swimming pool, fitness area, and a meeting room/multipurpose room. Making hotel amenities available to the surrounding community is outside the scope of consideration of the EIR, but is noted and will be provided to decisionmakers through the publication of this Final EIR. Following circulation of the Draft EIR, the applicant submitted revised plans to the City indicating that Alternative 2 (with revisions), is now the Proposed Project that would be considered for approval. This Proposed Project is described in the Final EIR as Modified Alternative 2. Due to the decreased size of the project, Modified Alternative 2, the project now under consideration, does not have a swimming pool.

Comment Letter: C-4, Roberta Gelt

Roberta forward to City Staff on Friday, July 29, 2022 8:34PM
From: Roberta Gelt

Date: July 17, 2022 at 10:38:04 PM PDT

To: Dave S

Subject: Re: Hyatt

C-4.1 On Sun, Jul 17, 2022 at 12:26 PM Roberta Gelt <regmft@gmail.com> wrote:
Dave thanks for continuing to lead the fight against this ridiculous development. Another huge hotel in HMB is neither needed nor wanted by locals. I cannot count the number of new hotels, motels and inns that have been built here over the 40 years since I've moved here. They have changed the atmosphere and the quaintness of the town of HMB and the rest of the coastside. They have brought more people to the coast, people who want to change it more and make it like the area from which they just moved. There are no longer beautiful hills to hike since they are now filled with houses; the big open fields are now filled with large grocery stores, Burger King and McDonalds. The small town feel is slowly fading away (well maybe not so slowly) and the addition of this Hyatt Hotel will open the area to more and more developments. These are not factual reasons that the hotel should not be built, more emotional ones, but ones that matter to those of us who have lived here for years and years.

C-4.2 The area in which the hotel is supposed to be built is an area that is a haven for hawks and herons but this is not why the tourists come to the coast. They come for the stores and restaurants which bring money to the coast, thus the reason the developers want the hotels to be built, not for the enhancement of the area for the locals but for the money the tourists will bring in. I am adamantly against this development. I'm sad for the generations to come. At least I got to experience some of the rural feel of the coast although not all. Hopefully by the time this has been built I will have moved on, as many already have to escape the "progress" coming here.

Thanks
Roberta Gelt

Response to Commenter Letter C-4: Roberta Gelt

C-4.1 Please see Topical Response 2, Aesthetics, for a description of visual character.

As described in Section 4.1, Aesthetics, of the Draft EIR, changes to the project site would be consistent with the developed nature of Downtown, although the buildings would be significantly larger and present longer facades than existing development patterns throughout Downtown and in the immediate neighborhood. To address this, the Original Project would incorporate high quality design elements, landscaping, and screening techniques. With incorporation of these design features, the Original Project was found to be consistent with LCLUP Policy 9-6, which requires new development to be visually compatible with the character of its setting. The building design incorporates natural colors and materials to be visually compatible with the SR-1 setting because the site is located near open fields to the south and west, and foothills can be seen to the east. The Original Project mass is broken up into multiple structures and building design and materials were selected to be visually compatible with agricultural building forms, colors, and rough textures. Landscape elements align the two sides of the Original Project to the context of each side of the site. However, the visual quality of the project site as seen from public viewpoints is conservatively considered to be adversely affected by the Original Project (Impact AES-3, page 4.1-30 of the Draft EIR) as well as Modified Alternative 2. These conclusions are based on special circumstances related to both the site, including its location, shape, visibility, and gateway location; and the proposed development, including its relatively long facades and larger building forms than typically found in the city.

C-4.2 As described in Section 4.4, Biological Resources, of the Draft EIR, several species of common nesting birds were observed and might nest on the site, but no special-status bird species or raptors are expected to nest on the project site. Due to its small size and the predominantly non-native vegetation that dominates the project site, the site does not provide high-quality habitat for migratory birds in comparison to more natural areas with native trees and vegetation to the east and west. However, it is possible that nests may be discovered prior to or during construction. Mitigation Measure BIO-1f, as stated on page 4.4-26 of the Draft EIR, would avoid and/or minimize any impacts to bird species.

Comment Letter C-5, Michael W. Adler

Michael Adler - Fri 7/29/2022 11:52 PM

Dear MS Ekas,

I'm offering my comments regarding the proposed hotel development at the south portal entry to Main Street.

By way of background. I've been a licensed contractor for now close to fifty years. My work has taken me from New York City, Dallas, Los Angeles, and, since 1978, the Bay Area. I've been engaged in the construction of literally millions of square feet of office space, about 6,000 multi-family living units - apartments and condominiums, office buildings, parking structures, historic renovations, and adaptive reuse projects. While my CV might suggest I'm automatically a proponent of any development nothing could be further from the truth. Fifty years has given me what I believe is a keen and critical eye as to what is good development, what is good for a community. As a now 23 year resident of Half Moon Bay I've more than a vested interest in seeing good development in my very own back yard.

I've reviewed the draft EIR report as well as the concept drawings for the project. I viewed the story poles erected at the site. My conclusion is this is a good development for our city and our community.

A few points in no particular order:

- Aesthetic Impacts to Corridor and Highway views.

From the east to the west along 92 one meanders through rural and agricultural vistas only to crest 92 at the entry to Half Moon Bay and be greeted with a mobile home park, strip mall like retail, commercial properties, and more of the same as you approach Route 1. Hardly an inviting aesthetic worthy of our communal aspirations. One finds the same with the arrival from the north along the Route 1 corridor, just more of it and now including tacky motels. By contrast the Hyatt project is tastefully set back from the highway, at an appropriate scale of height and a tasteful articulation of facade. I see this project as an enhancement to an otherwise nondescript southern entry portal. That it hides the hideous fire department asphalt and faux building training center is just a grand bonus.

C-5.1

- Gateway Impact

I believe my comments in the first bullet point speak to gateway impacts.

- Small Town Aesthetic

While I would argue that, sadly, between the aforementioned corridors and bland monolithic projects such as the Coastside Adult Day Health Center, our "small town aesthetic" is a myth. However, the Hyatt project, by contrast, is redemptive in that its design is evocative of what we strive for. I have every confidence that the rigorous planning approval process will, through this lens, work with the project sponsor to assure that the scale, the articulation, the material selections will continue to be that enhancement to our community that the preliminary documents evoke.

C-5.2

- C-5.3 • Appropriateness of a Hotel on this Site
Entirely appropriate and needed. This neatly fits the market between the tony Ritz and the strip mall motels. I do not believe we have a hoteling option, with amenities, that fits this market. Further, following the lead of Pasta Moon, this helps to extend the active street scape of our community. It extends the Main Street economic corridor to the south.
- C-5.4 • Transportation and Traffic
Our traffic problems are weekends and holidays, folks from “over the hill” who enjoy our beautiful coast. I believe the dominant issue is these are mostly day visitors - arrive in the morning, departing in the late afternoon or evening. As opposed to increasing traffic this project provides a needed and economically attractive alternative for day visitors to convert to weekend visitors, reducing traffic and increasing the per-person economic investment in Half Moon Bay.
- C-5.5 • Stormwater Impacts, Light and Glare, Geology, Soils, Artifacts
These are what I will call red herring concerns. Between the state and code mandated requirements, the planning Conditions of Approval, the Building Department review and approval of Permit Documents and the rigorous and documented course of construction inspection and testing process, these concerns are wholly mitigated.
- C-5.6 • Jobs
This project will generate 1,000s of person hours of good paying construction jobs. It will then create a sustained employment opportunity ranging from entry level positions to mid and executive level positions. This we need.
- C-5.7 There are a few things I ask the project sponsor and the Planning Process consider. That the project be all electric. That there be a significant amount of photovoltaic electrical generation. That there be ample day-one EV charging stations. That there be added capacity, amperage and below grade conduits, for future EV charging expansion. That there be a mandate for a careful review to introduce sustainable materials and wherever feasible locally sourced materials.

Sincerely,

Michael W. Adler

Response to Commenter Letter C-5: Michael W. Adler

C-5.1 This is not a comment on the adequacy or content of the environmental analysis in the EIR but is noted and will be provided to decisionmakers through the publication of this Final EIR. Please see Topical Response 2, Aesthetics, regarding visual impacts and community character.

C-5.2 This is not a comment on the adequacy or content of the environmental analysis in the EIR but is noted and will be provided to decisionmakers through the publication of this Final EIR. Please see Topical Response 2, Aesthetics, regarding visual impacts and community character.

C-5.3 This is not a comment on the adequacy or content of the environmental analysis in the EIR but is noted and will be provided to decisionmakers through the publication of this Final EIR.

C-5.4 Please see Topical Response 1, Traffic, of the EIR for a description of transportation and traffic.

C-5.5 This is not a comment on the adequacy or content of the environmental analysis in the EIR but is noted and will be provided to decisionmakers through the publication of this Final EIR.

C-5.6 This is not a comment on the adequacy or content of the environmental analysis in the EIR but is noted and will be provided to decisionmakers through the publication of this Final EIR.

C-5.7 As stated in Section 4.7, Energy, of the Draft EIR, the Original Project would be constructed to employ various energy-saving designs such as EV charging stations and rooftop solar panels.

Comment Letter C-6, Marita Leth

Marita Leth - Thu 7/28/2022 8:01 PM

To HMB Planning Commission:

C-6.1 | The proposed project to build a Hyatt Hotel between Hwy 1 and Main Street at the south end of Half Moon Bay is a concern to many residents for several reasons. The visual impact on the environment and increased traffic congestion especially on weekends will be significant and needs careful consideration.

C-6.2 | First of all what is the current demand for hotel rooms in Half Moon Bay? What is the occupancy rate now compared to before the pandemic? The trend now is less conferences and more zoom meetings which will impact hotel demand.
Recently two hotels in Half Moon Bay were listed for sale, one was transformed to a homeless shelter. If these hotels had been fully occupied they most likely would still be in business.

C-6.3 | The location of the proposed Hyatt is not an ideal location for a hotel. It is situated between a very busy highway and Main street. Tourists generally want to be at the beach or downtown. This location requires a car to get to these attractions and will further add to traffic congestion. If the location is not desirable it will negatively impact occupancy.

Thank you for giving this project the attention it deserves.

Marita Leth

Response to Commenter Letter C-6: Marita Leth

C-6.1 Please see Topical Response 1, Traffic, regarding traffic impacts and Topical Response 2, Aesthetics, regarding visual impacts.

C-6.2 Please see response to comment B-1.1 regarding visitor demand.

C-6.3 Please see Topical Response 1, Traffic, of the Draft EIR for a description of transportation and traffic impacts. Additionally, please refer to Chapter 5, Alternatives, of the Draft EIR, which includes a discussion of alternative site locations that were considered but rejected and why the proposed location was selected.

Comment Letter C-7, Diana Roberts Mitchell

Diana Roberts Mitchell - Thu 7/28/2022 1:51 AM

C-7.1 | Everyone I talk to is opposed to a Hyatt Hotel. You will ruin the main reason people
want to come here - small town atmosphere with local business owners.
Diana Mitchell

Response to Commenter Letter C-7: Diana Roberts Mitchell

C-7.1 Please see Topical Response 2, Aesthetics, regarding character and aesthetic impacts. This is not a comment on the adequacy or content of the environmental analysis in the EIR but is noted and will be provided to decisionmakers through the publication of this Final EIR.

Comment Letter C-8, Rick Southern

Rick Southern - Tue 7/26/2022 11:54 PM

My name is Rick Southern. I have been a resident of the coast since 1998 and currently live in Miramar.

I am a moderate, neither pro or anti-development. I like to think I have good common sense.

C-8.1 | Reading the EIR and looking at the HMB's carefully constructed planning documents intended to protect the nature and small town character of the city specifically against projects like this, I wanted to register my opposition to the project. Not only is it inconsistent with these goals, but seems to specifically violate certain tenets relating to size, height, view obstruction and environmental harmony.
This so much feels like a smaller scale Dunes project where a developer is going to benefit at the expense of the members of the community who don't need further infrastructure challenges. I would expect, like Dunes, if you polled your constituents, 90% would be opposed.

Thank you for hearing me out,
Rick

Response to Commenter Letter C-8: Rick Southern

C-8.1 Please see Topical Response 2, Aesthetics, regarding aesthetic impacts and policy consistency with the LCLUP.

Comment Letter C-9, Dave Schorr

From: Dave S
Sent: Wednesday, July 27, 2022 7:07 AM
To: Jill Ekas
Subject: Hyatt - Suggestion/request

Dear Ms Ekas;

An observation, and a request regarding public education about the Hyatt project:

- C-9.1

WHAT:
When the story poles are redone by the applicant, please place prominent explanatory signage about the function of the story poles at the perimeter of the parcel.

WHY:
I've spoken with a good number of people, and a consistent impression and response is the perception that the story poles mean the project is a done deal, and is moving forward, and therefore nothing can be done about it, public comment is not necessary or effective. ("Resistance is futile.")
- C-9.2

ISSUES:
I understand the challenges in public outreach, public education as to the planning process, and getting public input. But the issue identified above, if nothing else, highlights the importance of the issue of visual impact/visual resources. People believe what they see. And the presence of story poles to most people tells them that a project is about to get built.
- C-9.3

Speaking among staff, applicant, consultants, planning commission, and a small number of members of the public who understand the process, is really an outlier sample. I believe that an effective and necessary way to both reach and educate the public about this project specifically, and about the planning process in general would be to have some signage/notice boards – perhaps similar to what one sees during political campaign seasons – explaining what the story poles mean, and what they don't mean.

It would be vitally important that these informational kiosks/billboards/whatever used very simple, plain English (and Spanish?) explanation. The jargon and lingo of the planning community is impenetrable and abstract to most people.

While I believe this is a useful and valuable approach to take, here's one big challenge with it:

C-9.3
Cont.

The main visual impact and impression of the proposed project is while driving in a motor vehicle north or south bound on Highway 1. Ideally, education of the public, both resident and visitor, would be aimed at the greatest number of people. But any explaining text on a sign, to be impactful and readable while driving, seems challenging. So, I'm not sure of the answer to this dilemma, but it does seem that additional public outreach and education on this point is important. There are no sidewalks or bicycle pathways on the eastern side of Highway 1 that would allow people safe opportunity to read any information posted in that orientation.

I'm happy to discuss this further, and brainstorm ways to increase public awareness, education, and input. If the quandary of informative and readable signage visible to motorists cannot be resolved, at the very least, posting information at the north and south ends of the subject parcel on Main Street could be a good partial solution, and much better than nothing.

Perhaps that Caltrans changeable message sign is not such a bad idea – just kidding.

Thanks,

Dave Schorr

Response to Commenter Letter C-9: Dave Schorr

C-9.1 The story poles will be kept at the project site in order to provide the public with massing context for the project. Signage is posted to explain the story poles' purpose. The Applicant will adjust the story poles to show the massing and scale of Modified Alternative 2 in advance of future public hearing(s).

C-9.2 Please see Topical Response 2, Aesthetics, regarding visual impacts.

C-9.3 The City has conducted public outreach efforts in the form of the Notice of Preparation to solicit comments on the scope of the Draft EIR, which included contact information for comments and questions regarding the Original Project. A Planning Commission meeting was held on August 9, 2022 to receive public comments on the Draft EIR and the Original Project. An information session for the public was also held at the Main Street Park Community Room, on August 31, 2022. The intent of this meeting was to provide information on the project and solicit comments.

Please see Topical Response 2, Aesthetics, regarding story poles.

Comment Letter C-10, David Schorr

David Schorr – City received July 25, 2022 and spoke at the July 26 Planning Commission Meeting –

Public comment from David Schorr, HMB resident. 26/07/2022 to Planning Commission

- C-10.1 I am commenting tonight on the Hyatt hotel proposal and draft EIR largely because the project applicant, simply put, has not paid attention to feedback that he has been given in the past. Public comment as far back as 2017, at an architectural advisory committee meeting in July 2020, a joint study session of AAC and planning commission in September 2021, all revealed significant problems with respect to project size and massing, and here we are nearly a year later, with the applicant presenting the exact same oversized project that we saw last September. He desperately wants you to ignore the elephant in the room, the size, massing and negative visual impact of this project. But that is not possible.
- It has been noted before, and is noted again in the sections of city code entered into the public record again tonight, that this project is clearly and plainly inconsistent with upwards of a dozen regulatory constraints on the size of development on this particular parcel. I specifically request that these points of inconsistency be a topic of robust discussion at the upcoming study session August 9.
- I am frankly baffled that the applicant has not chosen some other way of profitably developing this parcel which does not significantly and unavoidably encroach on legally protected visual resources, the views of the hills.
- C-10.2 As proposed, whether at 102 or 129 guest rooms, the project runs afoul of so many portions of city code that I don't see any way for planning commission to approve it in its current form. In addition to the many sections of city code noted, I would also like to add the following passages extracted from the LCLUP, Ch 3, p 36:
- “The small-town character is a leading draw for coastal visitors. Upscaling infrastructure to accommodate visitors and growth will be at cross purposes with maintaining the desirability of this area that visitors seek.”
- Concisely and eloquently stated, that is game, set, and match. This project is inconsistent with the development guidelines for the city.
- C-10.3 Additionally, from the Policies section of the LCLUP, section 3-36, regarding traffic and circulation: “To the extent feasible, limit the approval of new higher trip generating development”. This is clearly a “higher trip generating development”.
- C-10.4 There are valid concerns about additional water use in time of drought, traffic, impact on emergency vehicle response time, and other concerns, but from a regulatory standpoint, it is the glaring, acknowledged and unambiguous encroachment upon protected visual resources where this project is clearly inconsistent and cannot be allowed as currently designed.

C-10.4 | Once visual resources are gone, they cannot be mitigated, replaced, moved, or
Cont. | recreated.

Bottom line, what we have here is very simple – the desire of one individual to develop a parcel and make himself some money, versus the character, appeal, appearance and functioning of our town, for our 12,000 City residents, the 28,000 people who live on the coastside, and the 3 million people who visit our town every year specifically to experience it's scenic beauty. The decision on how to proceed is in your hands, how to apply City code for the benefit of many, rather than for the benefit of one.

Response to Commenter Letter C-10: David Schorr

C-10.1 In accordance with California Environmental Quality Act (CEQA) Guidelines Section 15201, the project has undergone a lengthy and iterative design process wherein feedback from the community was taken into consideration. In response to agency public feedback and in accordance with CEQA to identify alternatives that minimize project impacts, a reduced intensity alternative, Alternative 2, was developed which would reduce the overall massing of the project and address the need for additional housing in the city. Following circulation of the Draft EIR, the applicant submitted revised plans to the City indicating that Alternative 2 (with revisions), is now the Proposed Project that would be considered for approval. This Proposed Project is described in the Final EIR as Modified Alternative 2. Modified Alternative 2 would reduce degradation of existing visual character or quality of the site and its surroundings due to view blockage compared to the Original Project, and as described in the text revisions to Chapter 5.0, Alternatives, Modified Alternative 2 would substantially reduce the aesthetic impacts associated with the Original Project (Appendix 3.0-A, Attachment to EIR Text Revisions, of the Final EIR). The protected view of the ridgeline (available from Viewpoint 3) would not be obstructed by the structures associated with Modified Alternative 2 as compared to the Original Project due to the reduction in overall massing of the structures at the project site, improving views from surround viewsheds.

Please see Topical Response 2, Aesthetics, and Topical Response 5, Modified Alternative 2 for a description of land use and visual character.

C-10.2 Please see response to comment C-4.1 regarding visual character.

The project would be subject to design review by the City, which would ensure consistency with the "small-town character" references in the LCLUP.

As a point of clarification, the reference to LCLUP in Public Works Chapter 3, page 36 of the Draft EIR, is related to transportation impacts and discusses how the City attracts visitors which contributes to traffic.

For potential concerns regarding changes visual character of the site, please see Topical Response 2, Aesthetics, which discusses consistencies with the LCLUP, specifically Policy 9-3 regarding "small-town character." See also Topical Response 1, Traffic, regarding traffic impacts.

C-10.3 Please see Topical Response 1, Traffic, regarding traffic impacts.

C-10.4 For discussion of visual impacts please, see Topical Response 2, Aesthetics. Please see Topical Response 3, Water and Hydrology, and Topical Response 4,

Emergency Access and Traffic Safety, regarding water supply and emergency safety impacts.

Comment Letter C-11, Laura Alster-Martin

From: [REDACTED]
Date: August 17, 2022 2:45 PM

To: hyatthotel

C-11.1

I am against the construction of the Hyatt Hotel. I think our town has enough Hotels, Motels, Inns and Bed & Breakfasts. The Hyatt would be detrimental to the occupancy rates of all these existing businesses, most of which are far more in keeping with our 'small town charm'. Please note, I am not associated with any of them.
While I do believe HMB could use some middle income housing in town for people like me, retirees who had lived here for 30+ years, what I've seen of the current duplex development is more disruptive to down town than we should be allowing. 3 stories, including underground or low level parking is the tallest we should consider.

Thank you,
~Laura Alster-Martin

Response to Commenter Letter C-11: Laura Alster-Martin

C-11.1 Please see response to comment B-1.1 regarding visitor demand and visual character. This is not a comment on the adequacy or content of the environmental analysis in the EIR but is noted and will be provided to decisionmakers through the publication of this Final EIR.

Comment Letter C-12, Patricia Chimienti

FROM: Patricia Chimienti
Date: August 17, 2022 11:29 AM
To: hyatthotel

Please add this also to the official record.

Hello my name is Pat Chimienti and I have lived in HMB since 1989. The land my house is located on was purchased back in 1984. It took 5 long years to build my home. The City of HMB at the time only allowed one builder J.L. Johnson to construct houses in the Miramontes tract. He turned out to be a crook.

C-12.1 | Several years ago I learned of the Wavecrest Project, it was advertised as a new Middle School to replace the older Cunha School located on Kelly Avenue in HMB. Seems the school was only part of a big industrial park that would house a large retail outlet like Walmart! Can you imagine what would have happened to Main Street if this project was approved by the city council. I am so glad that many neighbors, including me, stood up and complained and finally got the project stopped.

C-12.2 | And now it seems another developers group the R G J C South LLC which is part of the James Ford Dealership in HMB, is trying to get a motel built on a narrow strip of land at the southernmost end of Main Street.

C-12.3 | Back in June 24, 2000 a Half Moon Gateway Sculpture by Sharon Mayers was erected to draw the eye to the entrance of downtown Half Moon Bay where the Wavecrest view corridor was protected and open, where the tree lined street and the lower income housing was inviting.
Now the City is putting in another intersection light at the entrance to Main Street from Hwy. 1. I was told by the City that it is not related to the Hyatt project, but an intersection light is one thing, but the large decorative cement wall and dirt piles on either side of Main Street's entrance tells me otherwise. It looks like a lead into a new 'housing development'.

C-12.4 | The Half Moon Gateway Sculpture is hidden behind the northern cement blockade, why do I have a feeling that this will become the first victim of the Hyatt Project?

C-12.5 | The second victim are the homes along the end stretch of Main Street. They will lose the view corridor to the Pacific Ocean, through the Wavecrest open fields. What they will see from their homes will be a parking lot and the back wall of a long motel with parked cars, waste bins and lights to keep the parking lit at night. They will also never see another sunset over the Pacific.

C-12.6 | DOES HMB REALLY NEED ANOTHER MOTEL. I got on my phone and googled hotels/ motels near HMB. I got 15!
I put up the information sites pics for each. I noticed that some had 'discounted' prices, because of the pandemic motels have not been open for customers. I also know that when the sun shines on the weekends HMB fills up with tourists. BUT realize this that the majority of tourists do not stay over night, unless of course it is during the Pumpkin Festival Weekend, yeah, one weekend a year. Half Moon Bay does not need another motel.

C-12.6 Cont. | The last two hotels I listed are San Benito house which built around 1910. It was just renovated when it had an unexpected fire. It will take a year to fix. The Holiday Inn Express could not make it in Half Moon Bay. It was renamed the Coastsider and that too now is defunct. The pandemic is the reason the City turned it into a temporary homeless shelter.

C-12.7 | On another note, this Hyatt project is located really close to the FIRE DEPARTMENT. These dedicated individuals are always training and preparing for what ever emergency comes their way and with this very dry weather in California now it most likely will cause the following to disrupt any Hyatt guests.

Truth is Half moon Bay doesn't need another motel/hotel!

C-12.8 | This Hyatt project, to me, shows as a "lead in project" for another big development that just happens to also be a part of the faceless LLC doing the Hyatt.
That project concerns the "unsold car lot" across Seymour Street from the original James Ford dealership. On that lot is only one story pole erected next to the 'unsold' cars.
This lot was an extension to the dealership approved by the city council back in 1998. Back then, there was a concern about the lot flooding by the other occupant of the area whose house had experienced it during large downpours.

C-12.9 | There was also a concern about the 'ugly' look of a parking lot, and the planting of trees and covers was discussed to hide the lot.
But the parking lot was approved even though there was much negative debate against it.
Commissioner Don Heinz said of the extension, "Parked cars don't cause noise and aren't bad neighbors." But now it is projected to become duplexes. Is the LLC trying to pull profit from their two land purchases?

C-12.10 | The one story pole is misleading, there should be 8 story pole erections on the lot to show the actual impact of the duplex development of 16-24 units!

C-12.11 | These duplexes are not "low income" housing units, however there are a few (4-6 units) designated as "affordable". Affordable to whom? The first buyer possibly but those could be resold for any price.
This duplex community will be very tight, crowded will require parking lots and lighting. And will increase the population of that alright close and tight neighborhoods Allowing this Hyatt hotel is just the start!

Stop the Hyatt Hotel project. And stop the duplex project. They are both bad ideas.

Response to Commenter Letter C-12: Patricia Chimienti

C-12.1 This is not a comment on the adequacy or content of the environmental analysis in the EIR but is noted and will be provided to decisionmakers through the publication of this Final EIR.

C-12.2 This is not a comment on the adequacy or content of the environmental analysis in the EIR but is noted and will be provided to decisionmakers through the publication of this Final EIR.

C-12.3 This is not a comment on the adequacy or content of the environmental analysis in the EIR but is noted and will be provided to decisionmakers through the publication of this Final EIR.

C-12.4 The sculpture was replaced by the SR-1 signalization project at the intersection of South Main Street and Higgins Canyon Road. The City replaced the sculpture with new landscaping and gateway signage independently of this application.

C-12.5 Please see Topical Response 2, Aesthetics, regarding impacts to views of open spaces and view corridors.

C-12.6 This is not a comment on the adequacy or content of the environmental analysis in the EIR but is noted and will be provided to decisionmakers through the publication of this Final EIR.

C-12.7 As discussed in Section 4.12, Noise and Vibration, of the Draft EIR, the Original Project is not expected to substantially increase ambient noise levels surrounding the project site. The ambient measurements made for the Original Project indicate that existing noise levels at the noise-sensitive receptors located in the project vicinity exceed 60 dBA (decibel) community noise level.

C-12.8 This is not a comment on the adequacy or content of the environmental analysis in the EIR but is noted and will be provided to decisionmakers through the publication of this Final EIR.

C-12.9 Landscaping on the east side of the property (i.e., near the proposed parking lot) would consist of ornamental trees, shrubs, vines and groundcovers. Street trees would be generally retained, and parking lot trees would be dispersed to provide filtered shade and a canopy throughout the lot. Some tree removals would be necessary to accommodate the development.

C-12.10 The story poles that were erected at the project site were intended to provide the community with a visual sense of the scale and massing of the project. The lot would be subdivided to facilitate future construction allowing for the project applicant, via a parcel map, to create four lots. The lots would be developed subject to coastal development permit review and the R-2 zoning regulations. These zoning requirements are applicable to the adjacent large neighborhood area bounded by Seymour Street on the south, SR-1 on the west, the north side of Myrtle Street to the north, and up to the lots fronting Main Street to the east that are zoned for mixed-use. In consideration of the zoning and existing development context, the future residential development would result in a more visually compatible development form than the existing surface auto dealership parking lot.

Please see Topical Response 2, Aesthetics, regarding story poles and visual impacts.

C-12.11 Please see Appendix 3.0-A, Attachment to EIR Text Revisions, of the Final EIR for a description of Modified Alternative 2. As part of Modified Alternative 2, the applicant proposes up to 16 residential units on four lots on the north side of Seymour Street. Any lighting associated with the residential development would be required to comply with the City's LCLUP dark night skies Policies 9-30 and 9-31.

Comment Letter C-13, Graham Hurrell

From: Graham Hurrell
Date: August 17, 2022 9:59 AM
To: hyatthotel
Dear City Council,

First let me thank you for the tireless (and often thankless) work you do for our city. I am constantly impressed by your willingness to serve and listen to the community. As always you want to hear from the community you serve .. so here goes ..

C-13.1 | I am particularly troubled by the application for a new hotel on open space next to James Ford. There are regulations about available views and this large building will undoubtedly block established views at this end of the town. Also architecturally it will be an eyesore!

C-13.2 | Do we have details about occupancy rates for existing hotels? My understanding is that these other options are never full. Also there are many opportunities to stay in Airbnb these days as well as hotels .. all of which fund council via taxes.

C-13.3 | Other factors to consider ...
Other factors to consider ...
• Traffic is bad enough already and we are not getting another access road to HMB anytime soon relying on Route 1 and 92 for the foreseeable future.

C-13.4 | • Water is a scarce resource, and hotels consume more per head than residents. When you're on holiday, restraint is not often a goal!

I hope we can agree and say 'no' to this new development.

Thanks and regards,
Graham Hurrell

Response to Commenter Letter C-13: Graham Hurrell

C-13.1 Please see Topical Response 2, Aesthetics, for a description of visual character.

C-13.2 Please see comment response B-1.1 regarding visual character and visitor demand.

C-13.3 Please see Topical Response 1, Traffic, regarding traffic impacts.

C-13.4 Please see Topical Response 3, Water and Hydrology, regarding water supply impacts.

Comment Letter C-14, Rita Pickering

From: Rita Pickering
Date: August 16, 2022 9:08 PM

To: Hyatthotel

C-14.1 | Please! No more hotels! Half moon Bay is getting to crowded!! Traffic is unbearable, crowds are suffocating, don't the locals get any consideration here or is it always about the tourists.

Response to Commenter Letter C-14: Rita Pickering

C-14.1 Please see Topical Response 1, Traffic, regarding traffic impacts.

Comment Letter C-15, Sara Nebeling

From: Sara Nebeling
Date: August 16, 2022 12:49 PM

C-15.1

To: Hyatthotel I really disagree with all the new development going on around HMB. We have gridlocked roads already, and our water situation is pretty dire already. No amount of income for the city is worth it if we all have to cut back on water drastically at some point, which surely will happen. Of course you already know that if there were to be a disaster of any kind we would all be stuck here, not able to get out. Hate to even think of that scenario. Please please consider the quality of life and safety of current residents before approving more development!!

Sara Nebeling, Half Moon Bay

Response to Commenter Letter C-15: Sara Nebeling

C-15.1 Please see Topical Response 4, Emergency Access and Traffic Safety, regarding emergency access safety concerns, Topical Response 3, Hydrology and Water Resources, regarding water supply impacts, and Topical Response 1, Traffic, regarding project related trip generation and traffic impacts.

FROM: T.J. Martin
Date: August 16, 2022 6:46 PM

Comment Letter C-16, T.J. Martin

To:Hyatthotel

Hi,

As a homeowner of Half Moon Bay, I am writing to express my opposition for the Hyatt Hotel project for the following reasons:

C-16.1 | • Irreparable harm to the character of that stretch of the the Half Moon Bay Highway 1 corridor

C-16.2 | •Increased traffic to Highway 1 and local roads

C-16.3 | • Obstruction of the mountain views
• Unnecessary, considering there are an abundance of hotels with meeting spaces already in Half Moon Bay

C-16.4 | I understand that the City will benefit from additional revenues from this project, but we need to introspectively decide which type of community we are and which type of community we want to become. Both residents and visitors are drawn to Half Moon Bay specifically to avoid the debacle of over development so prevalent throughout the Bay Area and proceeding with this project is just another step in the slow malaise of over development in an area not physically designed to handle influxes of people.
Thank you for your consideration.
Thomas Martin

Response to Commenter Letter C-16: T.J. Martin

C-16.1 Please see Topical Response 2, Aesthetics, regarding visual character.

C-16.2 Please see Topical Response 1, Traffic, regarding project related trip generation and traffic impacts.

C-16.3 Please see Topical Response 2, Aesthetics, regarding visual impacts.

C-16.4 The LCP and the LCLUP provide guidance for sustainable growth and development in the city. As described in Section 4.11, Land Use and Planning, the Original Project is consistent with allowable uses in the LCLUP. The project site is designated as a Commercial - General, which supports a variety of commercial activities including downtown retail, service and office uses, shopping centers, visitor-serving facilities, health care, health care, and live-work spaces. As a commercial hotel, the project would meet visitor-serving needs for maximizing coastal access while remaining consistent with requirements for protecting coastal resources and environmental sustainability.

From: Patricia Chimienti
Date: August 15, 2022 7:35 PM
To: hyatthotel

Comment Letter C-17, Patricia Chimienti



- C-17.1 | The picture above is another large apartment/condominium complex that is being built already in HMB. We must not allow many of this type of development in our small town. This development got pushed through, but the 8 condos on the end of Main Street should not be allowed. Please watch this 6 minute video that I want added to the official record and reviewed by the council during deliberations at this YouTube link: <https://youtu.be/RIoA9S8mcpY> Regarding the Hyatt Hotel project. HMB does not need another motel as there are over 15 in the area, but the big part of this project is the 8 buildings for up to 16-24 duplex units that are also planned to be built in that same location. The deadline for written comments is Tuesday September 13, 2022 by 5:00 PM at City Hall or via email at hyatthotel@hmbcity.com. So, this is my email and video to please be added to the official record concerning these projects. All around the Peninsula like in Belmont, Redwood City, Foster City and San Mateo there seems to be an excessive amount of LARGE APARTMENT/CONDOMINIUM COMPLEXES being built and now it is starting in HMB!
- C-17.2 | HMB has only two roadways in and out of town and with this excessive buildout will cause the population to increase substantially. Every weekend Hwy 1 and 92 basically become parking lots twice a day with traffic either entering or trying to leave HMB.
- C-17.3 | Aside from fog HMB is known for its wide open spaces and beautiful view corridors, these large developments will surely harm this.

- C-17.4 | Also, city water for HMB is basically from local privately owned groundwater wells and with the additional population especially, during this drought period, will lower the water levels! Being so close to the ocean this could cause salt water intrusion problems to wells! Since coming here and finally being able to move into my home in 1989, there have been attempts to build out this town. The first along the Ocean Shore railroad right of way, between Kelly and Poplar Avenues, which would have opened up the 'privately owned' lots between the railroad right of way, and the Francis State Beach.
- Then, of course, the attempted WAVE CREST development. Remember the promised NEW middle school? What wasn't mentioned was the large retail outlet that was to be built there. We all thought it would be WalMart, that would have crippled 'downtown' HMB permanently! Wavecrest is across the freeway from where the HYATT Project and the Ford's group condos are planned.
- C-17.5 | It will not be many years at all, until Ford's group will be closing their ICE car retail shop, as the EV revolution is starting. I feel that this condominium and Hyatt motel is a way for the Ford's group to make money before having to close up shop!
Please do not allow this unnecessary build out of half moon bay!

Response to Commenter Letter C-17: Patricia Chimienti

C-17.1 This is not a comment on the adequacy or content of the environmental analysis in the EIR but is noted and will be provided to decisionmakers through the publication of this Final EIR.

C-17.2 Please see Topical Response 1, Traffic, of the Draft EIR for a description of transportation and traffic.

C-17.3 Please see Topical Response 2, Aesthetics, regarding impacts to views of open spaces and view corridors.

C-17.4 As stated in Section 4.16.2, Existing Conditions, of the Draft EIR, Coastside CWD serves as the urban water retailer for Half Moon Bay. The Coastside CWD obtains water from multiple sources (Pilarcitos Reservoir, Upper Crystal Springs Reservoir, Pilarcitos Creek, Denniston Creek, and groundwater from the Airport Subbasin), and buys water from the San Francisco Public Utilities Commission annually. The Coastside CWD operates eight groundwater wells in the Denniston Well Field, known as the Half Moon Bay Terrace groundwater basin. However, the basin supplies limited water for domestic and municipal uses. Currently, a groundwater management plan has not been developed for the Half Moon Bay Terrace groundwater basin because the basin has been determined to be very low priority. Please see Topical Response 3, Water and Hydrology, for a description of water resources.

C-17.5 This is not a comment on the adequacy or content of the environmental analysis in the EIR but is noted and will be provided to decisionmakers through the publication of this Final EIR.

Comment Letter C-18, Nancy Rapp

FROM: Nancy Rapp
Date: August 14,2022 9:46 PM

To: hyatthotel
To whom it may concern:
C-18.1 | I oppose the building of the Hyatt Hotel.
| I oppose the building of the building of the duplex assortment.
Nancy Rapp

Response to Commenter Letter C-18: Nancy Rapp

C-18.1 This is not a comment on the adequacy or content of the environmental analysis in the EIR but is noted and will be provided to decisionmakers through the publication of this Final EIR.

Comment Letter C-19, Elizabeth Haning

From: Elizabeth Haning
Date: August 14, 8:57 PM

TO: Hyatt Hotel Email

C-19.1 | Another motel..hotel. do we need this. Housing is needed. can we grow and maintain the charming character of our town? We already have a difficult traffic situation. Maybe infrastructure first ...more roads or more lanes..on the egress roads we have....and then think about a hotel if needed. I guess the downtown merchants might be in favor..That,s understandable. E. Haning

Response to Commenter Letter C-19: Elizabeth Haning

C-19.1 Please see Topical Response 1, Traffic, regarding transportation and traffic.
Please see Topical Response 2, Aesthetics, regarding visual character.

Comment Letter C-20, Carol Spear

CAROL SPEAR**August 14, 2022**

To HMB City Council

I would like to make comment regarding the proposed building of a Hyatt Hotel and more condos in HMB. I am a long term resident since 1997 and enjoy living in HMB, I chose the coastal town specifically because it was a small city and more rural than places on the Peninsula. I have the following concerns about building the proposed hotel and condos;

C-20.1

1. Open land being removed

2. Increased traffic (which has got steadily worse over the years)

C-20.2

3. With increased traffic comes potential for increased accidents (HWY 94 closures as most people don't seem to know how to drive bends)

C-20.3

4. Increase use of our water (locally sourced)

C-20.4

5. Increase use of electricity (we already have too many outages compared to years ago)

C-20.5

6. Why build next to fire department?? I travel a lot and would never book at a hotel by a fire station because of potential noise

C-20.6

7. Has there been a study on how many hotel rooms are currently being used per day – and how many people have been unable to get rooms because of 100% occupancy?

8. Who are the proposed customers for this hotel? Most people just come for a day or weekend so it will have low occupancy for most of the week

C-20.7

9. Why build condos near route 1 ?– it will be noisy

C-20.8

10. If they are built they should be for low income people and the sales price/rental prices be capped. Also have a percentage that must go to HMB residents

I appreciate your time reading my email and taking into considerations my concerns.

Carol Spear
HMB resident

Response to Commenter Letter C-20: Carol Spear

C-20.1 Please see Topical Response 2, Aesthetics, regarding impacts to views of open spaces preservation.

C-20.2 Please see Topical Response 1, Traffic, and Topical Response 4, Emergency Access and Traffic Safety, regarding traffic and traffic safety impacts related to the project.

C-20.3 Please see Topical Response 3, Water and Hydrology, regarding water supply impacts.

C-20.4 As discussed in Section 4.7, Energy, of the Draft EIR, the Original Project is not anticipated to substantially increase the use of energy in the City of Half Moon Bay. The Original Project would comply with all requirements related to energy usage including California's Energy Efficiency Standards for New Buildings, Title 24, and California's Renewable Energy Portfolio Standard Program. Project implementation would incorporate several sustainability elements in an effort to reduce wasteful energy consumption. Mitigation intended to reduce energy consumption includes energy efficient design features of the Original Project, such as on-site EV charging stations and high-efficiency lighting throughout the site. The Original Project would also install glass solar panels on the roof, which would generate approximately three percent of the electricity used on-site.

Additionally, project construction would not increase demands on the electric power network during peak and base period demand periods, as construction energy demands would be largely associated with equipment and transportation fuels. Based on the total project energy usage outlined in Section 4.7, Energy, of the Draft EIR, the Original Project's estimated energy demand in 2022 (9,528 MMBtu, which converts to approximately 3 GWh) represents an extremely small fraction, 0.00075 percent of the regional energy use.

C-20.5 As discussed in Section 4.12, Noise and Vibration, of the Draft EIR, the Original Project is not expected to substantially increase the ambient noise levels surrounding the project site. This is not a comment on the adequacy or content of the environmental analysis in the EIR but is noted and will be provided to decisionmakers through the publication of this Final EIR.

C-20.6 Please see response to comment B-1.1 regarding visitor demand.

C-20.7 This is not a comment on the adequacy or content of the environmental analysis in the EIR but is noted and will be provided to decisionmakers through the publication of this Final EIR.

C-20.8 As discussed in the text revisions to Chapter 5.0, Alternatives, Modified Alternative 2 would include up to four units of housing on Lot 1. Please see Topical Response 5, Modified Alternative 2 for a description of Proposed Project development regarding the development of up to 16 residential units on four lots. The remainder of Lots 2-4 would be developed in the future as the auto dealership parking lot is converted over time, with the remaining residential development of up to 12 units.

Comment Letter C-21, Robert Sweetow

FROM: Robert Sweetow
Date: August 12,2022 1:44 PM

TO: Jill Ekas
Dear Ms. Ekas,

I watched the zoom conference on the Hyatt Hotel proposal with great interest this week. I was very impressed with your unbiased report on this proposal. I did not provide my own comments as I felt they would be redundant to the other excellent comments that were made. I simply want to reiterate a couple of what I believe were the most important points.

- C-21.1 | 1st is the fact that while each of the objections to this proposal may not stand on their stand on their own or violate existing codes, the cumulative effect of all of these issues (environmental, visual, abundance of existing hotels and B and Bs etc.) is quite significant. In particular, I wish to call attention to the fact that the proposed location is literally at the southern gateway of Half Moon Bay.
- C-21.2 | Given the residents' desire to maintain our small town uniqueness, the exceedingly typical, dull design of the hotel, and blockade of the mountain views is antithetical to this concept. I do hope you will share this email with the planning commission.

Thank you,
Robert Sweetow

Response to Commenter Letter C-21: Robert Sweetow

C-21.1 Please see the policy consistency tables that are provided in each environmental resource topic section of the Draft EIR. Please see Topical Response 6, Cumulative Impacts, regarding cumulative impacts. Please see Topical Response 2, Aesthetics, regarding impacts to visual quality and compatibility with the southern gateway. This is not a comment on the adequacy or content of the environmental analysis in the EIR but is noted and will be provided to decisionmakers through the publication of this Final EIR.

C-21.2 Please see Topical Response 2, Aesthetics, regarding impacts on scenic views and visual character. This is not a comment on the adequacy or content of the environmental analysis in the EIR but is noted and will be provided to decisionmakers through the publication of this Final EIR.

Comment Letter C-22, C.A. Young

From: Cid Young Date: August 11, 2022 at 2:23 AM PDT

To: Jill Ekas

Thank you.

C-22.1 | This afternoon, Hwy One was closed due to a head-on (DUI suspected) collision, which highlights my concerns about a far more major incident than a traffic collision involving only two cars, but which closed Highway One from 4:30 PM to almost 7:15PM on a weekday, due to the need for a Life Flight Helicopter dispatched to the scene and back to Stanford.

Once again, locals safety is impacted by more and more visitors in Cars, so having a robust Emergency Safety Plan is very important.

-C.A. Young

Response to Commenter Letter C-22: C.A. Young

C-22.1 Please see Topical Response 4, Emergency Access and Traffic Safety, regarding emergency access safety impacts related to the project.

Comment Letter C-23, Carlyse Ann Young

From: Cid Young Date: August 10, 2022 at 2:17:37 PM PDT

To: Jill Ekas Subject: Last night's Planning Meeting for proposed Hyatt Hotel

Hello Jill,

Thank you for conducting the Planning Commission meeting regarding the proposed Hyatt Hotel at the Southern Gateway of the City of Half Moon Bay.

C-23.1 My concern is mainly about inadequate local infrastructure, water rates and consumption, views, traffic and emergency evacuation measures (especially on a day when the Coast is full of road-clogging visitors who might not know how to safely evacuate in the case of a natural disaster such as Tsunami or Fire) and the possible chaos that could ensue.

C-23.2 So, my question that I do not believe was answered last night is: Does the City of Half Moon Bay now have an updated General Plan and a robust Safety Element in place? (At my last inquiry it was still "in the works".) If so, could you please provide me the link to said "safety element" or recent general plan, to review,? I fear that should there ever be a need for an Emergency Evacuation coordinated with CalFire, the CHP and the SMC Sheriff's Office, the City will not be at the ready. So, could you please forward the Safety Plans at your earliest convenience? (Thanks).

C-23.3 It is NOT simply the proposed 102 room hotel, but the possible lack of Safety Planning plus the CUMULATIVE traffic that will be produced from adding more and more Coastal visitor-serving attractions such as: Tunitas Creek Beach (60 planned parking spots in the Parking lot) the proposed 50 spots & 7 tent campsites at the Harbor Village RV Park, the New Pump-track in Quarry Park now open, but with additional parking still in the works, the proposed Dunes Beach Project, the Cypress Ridge 71 units planned by MidPen Housing in Moss Beach (with a planned 138 on-site parking spots for an estimated 200 residents) and not to mention all the proposed housing (high density affordable homes) as detailed in the recent 2022 Planning meeting for the state-mandated Housing Element for Half Moon Bay in the coming next 10 years. I do admit there is a longing for the "quaint" and charming" small town feel to return to the Coastside as it was when I moved here in 1988.

C-23.4 I am a member of CERT for Seal Cove in Moss Beach, and I follow the CFPD meetings regularly but, the general MidCoast emergency evacuation "plans" are always pretty vague. During their meetings I have asked if there is a designated MidCoast Emergency Shelter and I was told there is not. (I do know that during the fires of 2000 the Half Moon Bay High School was designated as such for the evacuees displaced from Pescadero and the South Coast, but we locals were also asked to not use Hwy One south of Half Moon Bay due to the need for emergency crews and large animal evacuations to get through. However, I doubt if Half Moon Bay could even accommodate their own population at said High School in the event of a dire emergency.

In addition, since then, the new US Census now reports that the combined unincorporated population (11,740) of the MidCoast (Moss Beach) 3,436), Montara (2,833), & El Granada (5,471) is nearly equal to that of Half Moon Bay (11,795) so, by adding more and more visitor-serving buildings to your City, one might expect that will further impair everyone's chance to escape a conflagration or another climate-induce storm event like on Dec. 14th, 2021 when the Pilarcitos Creek overflowed onto Hwy 92, Carter Park, the City's 20+ acre Corporation Yard at 880 Stone Pine Road, and nearly flooded our joint powers authority Sewer Plant, which could have resulted in fines by the EPA to all Coastside rate payers.

C-23.4 Cont. | I hope there is a Safety Element in your updated General Plan, or, if not, you really should urge the City to get on it, as they promised to do two years ago.

C-23.5 | With a deficient Storm Water infrastructure system, it concerns me that the City keeps putting off the important things and rather spends valuable time on approving Developer's new Projects. As mentioned regarding the City Budget, in the HMB Review: "The city also reviewed the five-year Capital Improvement Project list that identified 67 projects and programs to be completed in the coming years for an estimated cost of \$110 million, though \$70 million worth of them remain unfunded. City engineer Maziar Bozorginia said one of the key projects for next fiscal year is upgrading the city's stormwater management plan in light of the heavy rainfall and flooding last winter. The last stormwater study was completed in 2016.

"I think our revenue stream will hopefully continue to recover," Council-member Robert Brownstone said. "It's nice to see that we're looking again at bringing up the pace of our capital improvements and infrastructure."

C-23.6 | It may seem that I am being critical, but I do admit that I am concerned about adding more buildings when the infrastructure is so lacking, under-funded or continually being put off. Especially the additional sewage, and traffic that will be created, with #HMBGRIDLOCK and a Sewer Plant Lawsuit appeal being ignored.

Sincerely,
Carlyslle Ann Young

Response to Commenter Letter C-23: Carlyle Ann Young

C-23.1 Please see Topical Response 2, Aesthetics, regarding impacts to scenic views. Please see Topical Response 3, Water and Hydrology, regarding water supply impacts. Please see Topical Response 4, Safety, regarding emergency access safety related to the project.

C-23.2 This is not a comment on the adequacy or content of the environmental analysis in the EIR but is noted and will be provided to decisionmakers through the publication of this Final EIR.

C-23.3 Please see Topical Response 6, Cumulative Impacts, regarding cumulative traffic impacts.

C-23.4 This is not a comment on the adequacy or content of the environmental analysis in the EIR but is noted and will be provided to decisionmakers through the publication of this Final EIR.

C-23.5 This is not a comment on the adequacy or content of the environmental analysis in the EIR but is noted and will be provided to decisionmakers through the publication of this Final EIR.

C-23.6 This is not a comment on the adequacy or content of the environmental analysis in the EIR but is noted and will be provided to decisionmakers through the publication of this Final EIR.

Comment Letter C-24, Denise Rundle

FROM: Denise Rundle**Date: August 23, 2022 12:05 PM**

TO: HyattHotel To HMB Planning Commission,

- C-24.1 I am against the building of any hotel or motels. Half moon bay cannot fill the hotels we have now and the B&B's are suffering. A huge commercial conglomerate Hotel such at the Hyatt will first of all look awful!! Whatever is built they now looks like quite honestly crap. Our infrastructure cannot handle the traffic flow now? What are you thinking? It will be an eye soar. It will hinder hillside views. I don't believe parking it's going to be a mess. That field across the road is supposed to be all POST. I worked very hard on the creation and maintenance of the dog park. For the longest time HMB would have nothing to do with it. We raised money for the fence we finally got no potable running water. So water bottles should sit in the sun to kill any pathogens. Yet the "Master plan" will enlarge? That means it will encumber the POST land no one was allow to walk thru in hopes of revitalizing the habitats. Now it doesn't matter? Who is really paying for this? Hyatt? Don't want it.
- C-24.2 HMB needs a commercial moratorium on building. Commercial. And large homes over 20,000 sq ft. No solid high fenced compounds. Keep your eyes on the sea cliff and on the sea cliff homes bought by LLC's.
- C-24.3 The more difficult to buy and move here the more desirable the more tourism. That's what you need to concentrate on.
- C-24.4 Forget about Hyatt and more on please. Tourism and State Beaches. Start with thst mess at 1850 Cabrillo highway. They are holding Rave Parties. DJ music, no biz lic. No permits. Not lic from ABC. No permits for assembly. Nothing. I went to county clerk Current owner just ignores the Coastal Commission. Why don't sheriff shut them down? It's illegal. It's dangerous. Charter buses drop off people. There are no dates or schedule I can find yet. I have a person checking Dark Web for info Start there and make it a proper state beach. There you have it. The 2 ends of town making a mess. Clean it up.

If you have any questions, please call me 415-860-7240.

Thank you, Denise Bernardini Rundle

Response to Commenter Letter C-24: Denise Rundle

C-24.1 Please see Topical Response 1, Traffic, regarding project-related trip generation and traffic impacts. Please see Topical Response 2, Aesthetics, regarding impacts on visual quality.

As stated in Section 4.15, Transportation and Traffic, of the Draft EIR, evaluation of parking impacts is not required under CEQA. However, the City will be evaluating parking as part of the application review process, and a parking discussion is available in Appendix H, Traffic Impact Study, of the Draft EIR. Additionally, Section 3.2, Project Components, of the Draft EIR, states that the Original Project would include 148 parking spaces, which is greater than either the Half Moon Bay requirement (146 spaces) or the projected parking demand (128 spaces).

Following circulation of the Draft EIR, the applicant submitted revised plans to the City indicating that Alternative 2 (with revisions), is now the Proposed Project that would be considered for approval. This Proposed Project is described in the Final EIR as Modified Alternative 2. The Original Project as evaluated in the EIR is not changed. Modified Alternative 2 includes a 102-room hotel and 108 parking spaces, which is greater than the Half Moon Bay requirement.

C-24.2 This is not a comment on the adequacy or content of the environmental analysis in the EIR but is noted and will be provided to decisionmakers through the publication of this Final EIR.

C-24.3 This is not a comment on the adequacy or content of the environmental analysis in the EIR but is noted and will be provided to decisionmakers through the publication of this Final EIR.

C-24.4 This is not a comment on the adequacy or content of the environmental analysis in the EIR but is noted and will be provided to decisionmakers through the publication of this Final EIR.

Comment Letter C-25, Dave Schorr

FROM: Dave Schorr
Date: August 22, 2022 2:44 PM

TO: HyattHotel

C-25.1 | Hello - Following up on this request from Aug 8 for eyeball height delineation - I am on a very tight timeline to complete comments on the Draft EIR, and this clarification would be appreciated.

Thank you!

Response to Commenter Letter C-25: Dave Schorr

C-25.1 The existing condition and simulation photos, provided by Square One, were taken from standing eye level or approximately 48"-56" from grade for each viewpoint.

Comment Letter C-26, Larry Hebb

FROM: Larry Hebb
Date: August 21, 2022 2:26 PM

TO: HyattHotel
Jill:

Thank you and the City of Half Moon Bay for the opportunity to provide public comment on the proposed Hyatt Place Hotel and review the draft EIR.

C-26.1 I am writing in support of Alternative #2, the 102 room version which was discussed. The reduced size of the project, greater set-backs and enablement of the eight duplex units along Seymour Street are meaningful improvements and go a long way to addressing impacts of the project.

One suggestion to further improve Alternative #2 is to require that the South Building (two story) have an elevation of more than two feet lower than the three story North Building (proposed 34' maximum -vs- 36' maximum) to further reduce the loss of ridgeline sight lines from westerly and southerly views.

C-26.2 I would be a user of this property and this use would not lead to increased traffic on 92/1/ Main Street. In my work, we frequently have out of town guests who are in the Bay Area for several days, visiting offices and clients in both San Francisco and on the Peninsula. A Hyatt Place hotel would allow me to have them stay in HMB with me driving them from the City one evening and to the Peninsula the next morning on a vehicle trip which would happen anyway. The City would benefit with the additional Transit Occupancy Tax currently going to Cities over-the-hill without an added traffic burden.

Very best,
Larry Hebb
Half Moon Bay

Response to Commenter Letter C-26: Larry Hebb

C-26.1 Please see Topical Response 2, Aesthetics for a description of the design considerations made in an effort to reduce the aesthetic impacts associated with the Original Project and Topical Response 5, Modified Alternative 2, which is now the project under consideration for approval.

C-26.2 This is not a comment on the adequacy or content of the environmental analysis in the EIR but is noted and will be provided to decisionmakers through the publication of this Final EIR.

Comment Letter C-27, Hiroshi Menjo

FROM: Hiroshi Menjo
Date: August 18, 2022 6:51 PM

TO: HyattHotel

C-27.1 | Adding more apartments and condos is suicidal for Half Moon Bay. That will deteriorate the positive reputation of HMB, and will damage its brand and value. No one wins by such developments. I am against it. Hiroshi Menjo 995 Siskiyou Dr. Menlo Park, CA 94025

Response to Commenter Letter C-27: Hiroshi Menjo

C-27.1 This is not a comment on the adequacy or content of the environmental analysis in the EIR but is noted and will be provided to decisionmakers through the publication of this Final EIR.

Comment Letter C-28, Matt Davis

FROM: Matt Davis
Date: August 18, 2022 6:51 PM

TO: HyattHotel

C-28.1

Hi, I just thought I would send this message to give my support to the hotel project. It's private property, so the question of whether or not we have "too many hotels/motels in town" shouldn't be a deciding factor to me. That would be the owners business. I feel like our southern entrance to Main street is currently ugly. I think a nice new building, which would most likely be taken care of, would look better than what we have now.

Thank you,
Matthew Davis
Alcatraz Ave.
Resident of Half Moon Bay

Response to Commenter Letter C-28: Matt Davis

C-28.1 This is not a comment on the adequacy or content of the environmental analysis in the EIR but is noted and will be provided to decisionmakers through the publication of this Final EIR.

Comment Letter C-29, Melissa Lamb

FROM: Melissa Lamb
Date: August 18, 2022 1:39 PM

C-29.1 TO: HyattHotel
We do NOT need another hotel in hmb. The drain of resources would harm residents and lead to even more traffic.

Sincerely
Melissa Lamb
HMB resident

Response to Commenter Letter C-29: Melissa Lamb

C-29.1 Please see Topical Response 1, Traffic, regarding traffic impacts. This is not a comment on the adequacy or content of the environmental analysis in the EIR but is noted and will be provided to decisionmakers through the publication of this Final EIR.

Comment Letter C-30, Laura Fine

FROM: Laura Fine
Date: August 18, 2022 10:54 AM

TO: HyattHotel
Dear Half Moon Bay,
Our family has resided in HMB for over 5 years and urge committee members to vote no to the Hyatt HMB construction.
We appreciate our neighbors' video <https://youtu.be/RIoA9S8mcpY> and think it would be valuable to view prior to decision making.

C-30.1 | In addition, the field across from the proposed structure is protected land that serves as a bird and wildlife sanctuary. Undoubtedly, a hotel with tourists will compromise the space (especially when the mustard blooms for crowds trying to take photos).

C-30.2 | We've enjoyed the small town feel but have also felt the pressure with excess gridlock traffic; it worries our family that in the event of an emergency the one lane roads on highways 1 & 92 will be blocked.

Please think long term and preserve the beauty of Half Moon Bay by voting against building these structures across from the fire station/car dealership/refuge.

Thank you,
Laura Fine

Response to Commenter Letter C-30: Laura Fine

C-30.1 The project would not impact the open space located west of the project site across SR-1. In addition, as discussed in Section 4.4, Biological Resources, of the Draft EIR, the project site does not provide high-quality habitat for migratory birds due to its small size and the predominantly non-native vegetation that dominates the project site, in comparison to more natural areas with native trees and vegetation to the east and west. Migratory birds flying over or along the coastline may use the site as a stopover site for refueling and deposition of fat reserves to continue migration, but they are expected to do so in small numbers due to the marginal habitat quality.

C-30.2 Please see Topical Response 1, Traffic, regarding project-related trip generation and traffic impacts. Please see Topical Response 4, Emergency Access and Traffic Safety, regarding impacts on traffic and emergency access safety related to the project.

Comment Letter C-31, Paul Mc Gregor

From: Paul Mc Gregor

Date: Tuesday 09/13/2022 4:49 PM

To: HyattHotel

Subject: Hyatt Hotel

Good afternoon Jill, I am writing today in support of Greg Jamison's Hyatt hotel. He has been working on this project for over six years and has come along way. Through the cities and neighbors input this has become a better project.

C-31.1 Not only does it bring jobs To the community, it also cuts down traffic for these particular jobs. You have to take into consideration the Main Street housing project that I'm sure the majority of people would love to have the chance to work right across the street from where they live. The project benefits the community in many aspects.. It is the gateway at the south end of town. Which drastically needs improvement. I believe this will improve the southern gateway. With the bike trails, And the dedicated wetlands. This is a win-win for the city of half Moon Bay.

C-31.2 All the features in this hotel is something that future developers should aspire to. Again with the cities input and all the neighbors this has become a better project. There have been concerns about blocking ridge top views. With the project being pushed back as far as it is to the east it has opened up a lot of the ridge top views. I drive north every day and look at the story polls and I don't see what the big fuss is all about. Also going south, I don't see any problems with the height of the building. In my opinion this is a win-win for the city, TOT taxes, open space, saving wetlands, bicycle trails, improvement of main street. There's too much to name for all of the positive impacts.

I completely support this project, and please allow Mr. Jamison to move forward.

Sincerely Paul W Mc Gregor

Response to Commenter Letter C-31: Paul Mc Gregor

C-31.1 This is not a comment on the adequacy or content of the environmental analysis in the EIR but is noted and will be provided to decisionmakers through the publication of this Final EIR.

C-31.2 This is not a comment on the adequacy or content of the environmental analysis in the EIR but is noted and will be provided to decisionmakers through the publication of this Final EIR.

Comment Letter C-32, Connie Alice Hungate

From: ConnieAlice Hungate
Date: Tuesday 09/13/2022 4:35 PM

To: HyattHotel
Subject: traffic concerns around Hyatt project
Hi,

I'm concerned that the traffic analysis was conducted in 2019. I think weekend traffic conditions have changed considerably post-pandemic. I'd love to see some analysis on a nice fall weekend or summer weekend to understand the impact of the project on traffic.

C-32.1

Thank you!
ConnieAlice

"This condition does not include project-generated traffic volumes. Traffic volume data representative of the typical weekday was collected on May 8, 2019, while local schools were in session. Since there are typically special events of varying sizes occurring every Saturday, counts for the weekend period were conducted over two Saturdays, May 11, 2019, and June 1, 2019, and the higher of the two was applied in the analysis."

Response to Commenter Letter C-32: Connie Alice Hungate

C-32.1 Please see Topical Response 1, Traffic, regarding impacts related to traffic.

Comment Letter C-33, Larry Gandelman

From: Larry Gandelman
Date: Tuesday 09/13/2022 4:26 PM

To: HyattHotel
Subject: A Vote of Support
To Whom It May Concern:

C-33.1

I want to offer my sincere Letter of Support for the Hyatt Hotel project in Half Moon Bay. As someone who lived in HMB for 30+ years, raised my children in the community, was active with Half Moon Bay High School Boosters, raised money for a variety of local causes and is very interested in seeing our Main Street Merchants thrive, I implore the City to move forward with the “approval” of this project. The Jamison Family have been pillars of the HMB Community and Greg Jamison has been more than receptive and accommodating in revising the hotel plans on several occasions to adopt the feedback received at great personal expense.

HMB needs a Southern Gateway that draws “people in” versus speeding down Highway 1 to the north without exploring the “charm” of our Main Street. This project has been under “consideration” for over six (6) long years. It is time for the City of Half Moon Bay to take “affirmative” steps to make the Hyatt Place Hotel a reality. Traffic has always been an issue in our community. When living in HMB this has been “understood” yesterday, today and tomorrow. The beauty of coastsiding living is “worth” making the necessary adjustments to plan accordingly when known traffic patterns are “in play”.

I urge the Planning Commission to move forward and approve this much needed and highly desirable project.

Sincerely,
Lawrence M. Gandelman

Response to Commenter Letter C-33: Larry Gandelman

C-33.1 This is not a comment on the adequacy or content of the environmental analysis in the EIR but is noted and will be provided to decisionmakers through the publication of this Final EIR.

Comment Letter C-34, Irma Morawietz

From: Irma Morawietz
Date: Tuesday 09/13/2022 3:03 PM

To: HyattHotel
Subject: Hyatt-Hotel Comments

C-34.1 | I'm writing about the Hyatt-Hotel and it not being a good fit for our community. I have lived in Half Moon Bay for 26 years and I have seen many changes and never have I seen any concern for our increased traffic. We use to have bad traffic only during Pumpkin Festival and Dream Machines. Now, heavy and stopped traffic is a regular occurrence on most weekends.

C-34.2 | There are only two ways in and out of Half Moon Bay and in an emergency, the only way out would be with a helicopter. I am a CERT Block Captain and we have been practicing evacuation during an Earthquake or Fire. We would be not be able to leave the area,

We don't need another hotel, full occupancy never happens. I worked in the hotels, motels and inns for 30 years as a LMT.

C-34.3 | The Hotel would have a negative affect on our resources by blocking views of our beautiful hills from being seen when entering the city.

C-34.4 | Parking is another overtaxed resource that I am concerned would be negatively impacted by hotel guest and staff.

C-34.5 | Access to safety resources is another concern. The hotel will be built next to Half Moon Bay Fire Station, this will hinder access for firefighters.

Thank you, Irma Morawietz

Response to Commenter Letter C-34: Irma Morawietz

C-34.1 Please see Topical Response 1, Traffic, regarding traffic impacts.

C-34.2 Please see Topical Response 4, Emergency Access and Traffic Safety, regarding impacts on traffic safety, emergency access, and emergency response.

C-34.3 Please see Topical Response 2, Aesthetics, regarding impacts on scenic views.

C-34.4 Please see Topical Response 1, Traffic, regarding project-related trip generation and traffic impacts. Please see Topical Response 2, Aesthetics, regarding impacts on visual quality.

As stated in Section 4.15, Transportation and Traffic, of the Draft EIR, evaluation of parking impacts is not required under CEQA. However, the City will be evaluating parking as part of the application review process, and a parking discussion is available in Appendix H, Traffic Impact Study, of the Draft EIR. Section 3.2, Project Components, of the Draft EIR, states that the Original Project would include 148 parking spaces, which is greater than either the Half Moon Bay requirement (146 spaces) or the projected parking demand (128 spaces). Modified Alternative 2 would include 108 spaces for a 102-room hotel.

Following circulation of the Draft EIR, the applicant submitted revised plans to the City indicating that Alternative 2 (with revisions), is now the Proposed Project that would be considered for approval. This Proposed Project is described in the Final EIR as Modified Alternative 2.

C-34.5 Please see Topical Response 4, Emergency Access and Traffic Safety, regarding impacts on emergency response.

Comment Letter C-35, T Mendez

From: T Mendez
Date: Tuesday 09/13/2022 3:03 PM

C-35.1 | To: HyattHotel
I want to see the hotel come to Half Moon Bay. I think it would be a good idea. TM

Response to Commenter Letter C-35: T Mendez

C-35.1 This is not a comment on the adequacy or content of the environmental analysis in the EIR but is noted and will be provided to decisionmakers through the publication of this Final EIR.

Comment Letter C-36, Barry Franklin

From: Barry Franklin
Date: Tuesday 09/13/2022 2:03 PM

To: HyattHotel
Subject: I oppose the Hyatt project
To whom it may concern,

C-36.1 | While I applaud investors and business owners, I feel that the city of Half Moon Bay is unable to handle another hotel, especially in this location. I believe it will create more of a traffic nightmare for the area and local population. It is virtually impossible to leave HMB now on weekends which is setting us up for a horrible situation in an emergency. We have more traffic than we can currently handle. Basically I'm opposing the project on grounds of traffic and emergency management.
Best,

Response to Commenter Letter C-36: Barry Franklin

C-36.1 Please see Topical Response 1, Traffic, regarding traffic impacts and Topical Response 4, Emergency Access and Traffic Safety, regarding traffic safety and emergency response.

Comment Letter C-37, Jennifer Lee Segale

From: Jennifer Lee Segale
Date: Tuesday 09/13/2022 1:12 PM

To: HyattHotel
Subject: Hyatt
Hello,

C-37.1 | As a lifelong resident and business owner in HMB, I wanted to voice my opinion on the Hyatt project. I respectfully do not support this project on any level and think it would be a horrible idea for the town, the southern entrance into the town, and for the surrounding sensitive wildlife.

Thank you, Jenn Segale

Response to Commenter Letter C-37: Jennifer Lee Segale

C-37.1 Please see Section 4.4, Biological Resources, of the Draft EIR, which identifies existing biological resources on and surrounding the project site and potential impacts to sensitive biological resources, outlines standard conditions of project approval, and proposes mitigation measures to reduce potentially significant impacts.

Comment Letter C-38, Debbie Daugherty

From: Debbie Daugherty
Date: Tuesday 09/13/2022 12:28 PM

To: HyattHotel
 Subject: Hyatt Hotel Project
 Dear HMB City,

There are many concerns about this project that many citizens of HMB, my husband, and I have in regards to to this project moving forward.

- C-38.1 | There are already plenty of hotels in our city, that aren't being used to even to half of their full capacity.
 Why would people want to stay at a hotel, with the fire engines and paramedics sirens going off at all times of the day and night?
- C-38.2 | This project is violation of our City Code and Policies regarding protection of our visual resources, such as coastal hills.
- C-38.3 | The negative impact in regards to traffic will only add to grid lock that we have in our downtown, not to mention on highways 1, and 92. We do not have the ability to manage what we already have in terms of problems with traffic jams currently, and another hotel will add more to what is already a huge problem especially with the heat waves that are being generated by climate change.
- C-38.4 | Currently we are water rationing, if we are asking people to reserve water, why would we add to this current issue which is also being impacted by climate change?
- C-38.5 | As a downtown resident for over 35 years, our town used to have slow growth laws, which seem like they have been thrown out the door. The excessive building of projects that are not needed and that are putting more stress on our infrastructure, that is difficult considering we are being majorly impacted by climate change.
- C-38.6 | Our focus should be on building affordable housing for those who work in our community.
 In closing we feel this project should not go forward.

Thank you,
 Debra Daugherty
 Comments specifically referencing the hotel project in violation of City Code and Policies regarding protection of visual resources (the coastal hills) will be most effective, but any thoughts on negative impacts of the Hyatt (water, energy, traffic, etc) are all good to get on record.

Response to Commenter Letter C-38: Debbie Daugherty

C-38.1 Please see Topical Response 2, Aesthetics, for a description of the applicable LCLUP policies and provisions of the Municipal Code, including the Zoning Ordinance, pertaining to visual resources.

C-38.2 Please see Topical Response 2, Aesthetics, impacts to visual resources and consistency with associated City policies.

C-38.3 Please see Topical Response 1, Traffic, regarding traffic congestion concerns.

C-38.4 Please see Topical Response 3, Water and Hydrology, regarding water supply.

C-38.5 This is not a comment on the adequacy or content of the environmental analysis in the EIR but is noted and will be provided to decisionmakers through the publication of this Final EIR.

C-38.6 This is not a comment on the adequacy or content of the environmental analysis in the EIR but is noted and will be provided to decisionmakers through the publication of this Final EIR.

Comment Letter C-39, Laura Dunston

From: Laurie Dunston

Date: Tuesday 09/13/2022 10:42 AM

To: HyattHotel

Subject: Visual monster

C-39.1

It has been brought to my attention that the size and impact of the proposed hotel is a violation of the city code and impact on our visual resources.

I do not understand why this project has not been rejected.

Thank you

Laurie Dunston

Response to Commenter Letter C-39: Laura Dunston

C-39.1 Please see Topical Response 2, Aesthetics, impacts to visual resources and consistency with associated City policies.

Comment Letter C-40, Margaret, Robert, and Amber Stow

From: The Paper Crane
Date: Tuesday 09/13/2022 9:26 AM
To: HyattHotel
Subject: Opposed to current Hyatt Place project proposal

Dear Members of the Hyatt Place Planning Committee:

C-40.1 As owner and operators of The Paper Crane, we would like to express our concerns about the Hyatt Place project. The scale and design of the proposed hotel are not in keeping with our historic Main Street, and would not create an inviting southern gateway to Half Moon Bay's downtown. The project creates guest lodgings that do not appear to be in demand, places additional strain on the infrastructure and roads, and creates jobs when there is already insufficient affordable housing in Half Moon Bay.

C-40.2 Though the hotel would provide guest lodgings within walking distance of downtown businesses, this is true only in a literal sense. From comments we hear from our customers, we suspect that few visitors are willing to walk close to a mile in order to shop and eat downtown, and then return to the hotel carrying full shopping bags. Most will drive the nine blocks and park downtown, just as they would from any other local hotel.

C-40.3 Half Moon Bay has no shortage of lodgings, luxury or otherwise; as of a 2019 study, hotel occupancy stands at only 65%. The city needs more affordable housing for the people who currently work at local hotels and other service businesses. The Paper Crane endorses the Alternative 2 Plan in the EIR which would use the land for 20 units of residential housing, in an area of our city where there is a critical need for it, and which is along existing public transit corridors. We oppose the current planned hotel project.

Thank you for this opportunity to express our views and endorse the Alternative 2 Plan. We appreciate your attention to our concerns and your efforts to meet the needs of the community as well as of the land owner/ developer.

Sincerely, Margaret, Robert, and Amber Stow
The Paper Crane
Half Moon Bay, CA 94019

Response to Commenter Letter C-40: Margaret, Robert, and Amber Stow

C-40.1 through C-40.3 This comment letter is duplicative of Comment Letter B-1, submitted by the organization, The Paper Crane. Please refer to responses provided in comment responses B-1.1 to B-1.3.

Comment Letter C-41, Kathena Evelon

From: Kathena Avelon
Date: Tuesday 09/13/2022 8:40 AM

To: HyattHotel
Subject: Hyatt Hotel negative impact

C-41.1 | I am a resident of Half Moon Bay. I am alarmed that during these years of severe drought the city would consider opening yet another Hotel in yet another location. Residents have already been asked to cut back on water use in every way that they can. We don't have the water resource to support this massive project.

C-41.2 | Traffic impact is another issue. Most residents like myself refrain from going anywhere on the weekends due to visiting traffic. We have only two routes on and off the coast here. Another hotel will invite that traffic to linger throughout the week. More traffic signals and roundabouts will slow traffic 7 days a week instead of the weekend clog that we now face.

C-41.3 | In addition to water and traffic, big hotels like big box stores obscure the beauty of our coastline and destroy the charm and beauty that draw so many to this refuge that nature has created.

Please do not allow this Hyatt project to move forward. Respectfully yours, Kathena Avelon
Resident of HMB

Response to Commenter Letter C-41: Kathena Evelon

C-41.1 Please see Topical Response 3, Water and Hydrology, regarding water supply impacts.

C-41.2 Please see Topical Response 1, Traffic, regarding traffic impacts.

C-41.3 Please see Topical Response 2, Aesthetics, regarding impacts to visual resources.

Comment Letter C-42, Kathryn Murdock

From: kathryn murdock
Date: Tuesday 09/13/2022 5:49 AM
To: HyattHotel
Subject: Hyatt Hotel
More high - end not needed.

C-42.1 | Destroying everyone's beneficial views of the hills.

C-42.2 | Too much water usage

C-42.3 | More low paying jobs not needed

C-42.4 | Would add to the already horrendous traffic problems

C-42.5 | Needed are establishments for those who already live here

kathryn Murdock

Response to Commenter Letter C-42: Katheryn Murdock

C-42.1 Please see Topical Response 2, Aesthetics, regarding impacts to views of the hills.

C-42.2 Please see Topical Response 3, Water and Hydrology, regarding water supply impacts.

C42.3 This is not a comment on the adequacy or content of the environmental analysis in the EIR but is noted and will be provided to decisionmakers through the publication of this Final EIR.

C-42.4 Please see Topical Response 1, Traffic, regarding traffic impacts.

C-42.5 This is not a comment on the adequacy or content of the environmental analysis in the EIR but is noted and will be provided to decisionmakers through the publication of this Final EIR.

Comment Letter C-43, Melissa L.

From: Melissa L
Date: Monday September 12, 2022 10:28 PM

To: HyattHotel
Subject: Comments on Hyatt Hotel
Dear Planning Commissioners,

Thank you for taking the time to hear from residents about the proposed Hyatt Hotel. I have enjoyed reading the EIR and public comments posted to the website. HMB is not immune to issues with change and growth that affect communities everywhere. These changes are never perfect and can sometimes be completely detrimental to an area. After careful review, I believe the Hyatt Hotel is a well-thought-out, beneficial addition to our community.

C-43.1

I appreciate the updates to the design that were made in response to residents' concerns. Instead of a car dealership, a beautiful hotel will be the entrance to our southern gateway. Bike rentals will minimize the impact on road congestion. The upscale brand and location help ensure that guests are supporting our downtown businesses. I'm also pleased with the local employment opportunities. Hyatt is a top company to work for with excellent benefits and career development opportunities. Secure employment and paths to upward mobility help individuals and communities.

I whole-heartedly agree that we need a major transportation overhaul to support both residents and increased visitor growth. But delaying or preventing the Hyatt proposal will not solve our traffic problems and could leave us open to a worse development further down the line. The Hyatt Hotel is good for Half Moon Bay.

Thank you.
Melissa L.
Half Moon Bay, CA

Response to Commenter Letter C-43: Melissa L.

C-43.1 Please see Topical Response 1, Traffic, regarding traffic impacts. This is not a comment on the adequacy or content of the environmental analysis in the EIR but is noted and will be provided to decisionmakers through the publication of this Final EIR.

Comment Letter C-44, Jill and Wayne Impink

From: Jill Impink
Date: Monday September 12, 2022 8:52 PM

To: HyattHotel
Subject: In favor

C-44.1 | To whom it may concern, On behalf of myself, and my husband, we would like to to say we are
in favor of the new proposed Hyatt hotel. We both feel it will help revitalize the downtown Main
Street area, and would be a nice addition to the south end of town!

Thank you,

Jill and Wayne Impink

Response to Commenter Letter C-44: Jill and Wayne Impink

C-44.1 This is not a comment on the adequacy or content of the environmental analysis in the EIR but is noted and will be provided to decisionmakers through the publication of this Final EIR.

Comment Letter C-45, Laurie Dunston

From: Laurie Dunston
Date: Monday September 12, 2022 7:32 PM

To: HyattHotel
Subject: Visual monster

C-45.1 | I'm trying to visualize the proposed hotel, I measured the new library's width It also is about 35' high The hotel will be two & a third libraries wide on the piece of land. We in Half Moon Bay will have to live with that visual block every single day. I hope against hope that building is not approved. Half moon Bay has a charm to it and a building meant for El Camino Real is very disharmonious.

Thank you
Laurie Dunston
Half Moon Bay resident

Response to Commenter Letter C-45: Laurie Dunston

C-45.1 Please see Topical Response 2, Aesthetics and Topical Response 5, Modified Alternative 2, regarding impacts to visual resources and size and massing of the project and alternatives. As described in Topical Response 5, Modified Alternative 2 would reduce the overall size and massing of the project, thereby reducing visual impacts when compared to the Original Project.

Comment Letter C-46, Scott Forrest

From: SCOTT FORREST

Date: Monday September 12, 2022 7:13 PM

To: HyattHotel

Subject: Hyatt Hotel comments

I'm writing you to express my concerns regarding the Hyatt Hotel project. While I have a number of concerns, for this comment, I am focusing on the two most important to me.

- C-46.1 | One is the impact on traffic on the coast, which already is literally intolerable for many coastal residents leading to an exodus of many longtime members of our community. The Planning Commission must take traffic into account and offer mitigation efforts that will hopefully prove effective enough that this project avoids becoming a negative impact on our community and on the coastal resource that serves our visitors from the greater Bay Area and beyond.
- C-46.2 | The second is the preservation of our visual resources such as views of coastal hills. I understand that the Hyatt project may seek to violate City Code and Policies regarding protection of our visual resources. I strongly oppose any such waiver. I would like to remind the Planning Commission that once lost, such visual resources are unlikely to ever be recovered. Such loss diminishes the value of the coast as a recreational resource not just for residents but also for the tens of thousands of visitors to the coast seeking respite in exactly this sort of threatened resource.
- C-46.3 | Excessive traffic poses a similar diminishment to resident and visitors alike. At some point, adding resources such as the Hyatt project meant to enhance the experience for coastal visitors becomes a net negative when it's adverse impacts are allowed to spread unchecked.

Thank you for considering my comments.

Scott Forrest,
Coastal resident since 1966.

Response to Commenter Letter C-46: Scott Forrest

C-46.1 Please see Topical Response 1, Traffic, regarding traffic impacts. The transportation demand management (TDM) program measures, as described in Appendix H, Traffic Impact Study, of the Draft EIR, requires the TDM program measures to be monitored for effectiveness and adjusted as necessary. Mitigation Measure TRA-1 in Section 4.15, Transportation and Traffic, of the Draft EIR, states that the TDM program measures shall be monitored by surveys on an annual basis and adjusted as needed to mitigate project-generated VMT. In response to comments received on the Draft EIR, Chapter 3.0, EIR Text Revisions, Mitigation Measure TRA-1 has been modified and clarifies the requirement to implement a TDM plan with a mode-share VMT reduction commitment of 15 percent and ongoing monitoring.

C-46.2 Please see Topical Response 2, Aesthetics, regarding impacts to visual resources.

C-46.3 Please see Topical Response 1, Traffic, for a description regarding traffic impacts.

Comment Letter C-47, Sean Win-Yepez

From: Sean Win-Yépez
Date: Monday September 12, 2022 5:38 PM

To: HyattHotel
Subject: Questions for HMB Hyatt project
Dear HMB Planning committee:

Writing on behalf of the Yepez family that owns/dwells at 888 Third Ave, 339 Poplar St, and 332 Myrtle St. We love it here and want to preserve the coast for future generations. A few questions that we'd like to ask as the council evaluates the proposal:

- C-47.1 1) Would our city's power grid be able to reliably support another 129 units with air conditioning during increasingly warm evenings? The power grids over the hill have been experiencing substantial blackouts. Hotel rooms typically have AC and high power needs, and guests are not incentivized to obey flex alerts since they do not pay for power.
- C-47.2 2) Have the environmental/wildlife impacts of additional waste generation been evaluated? There are many deer and other animals in the fields and hills nearby the proposed site. For now, these animals tend to stay in the fields and hills. However, would these animals be attracted to the hotel? This could spill over to the downtown and nearby roadways posing a danger to wildlife and motorists.
- C-47.3 3) Have the roadway impacts been evaluated for the additional traffic? Road congestion in recent weeks on weekend evenings has been extreme. Maps applications estimated 25-50 minutes to drive from Poplar St @ Highway 1 to Hwy1/Hwy 92, just 0.9 mile. How would the additional traffic from hotel guests be circulated through Main St and Hwy 1? Would we need stop lights along main street for the additional ~129 cars/day?

Thanks for your help to maintain our city. Our preference is for no further hotel development, but we understand that there are other stakeholders and ask that existing homes and businesses continue to be well supported.

Best regards,
Sean Yepez & Family

Response to Commenter Letter C-47: Sean Win-Yeppez

C-47.1 As discussed in Section 4.7, Energy, of the Draft EIR, the project is not anticipated to substantially increase the use of energy in the City of Half Moon Bay. The project would comply with all requirements related to energy usage including California's Energy Efficiency Standards for New Buildings, Title 24, and California's Renewable Energy Portfolio Standard Program. Project implementation would incorporate several sustainability elements to reduce wasteful energy consumption. Mitigation intended to reduce energy consumption includes energy efficient design features of the project, such as on-site EV charging stations and high-efficiency lighting throughout the site. The project would also install glass solar panels on the roof, which would generate approximately three percent of the electricity used on-site.

Project construction would not increase demands on the electric power network during peak and base period demand periods, as construction energy demands would be largely associated with equipment and transportation fuels. Based on the total project energy usage shown in Section 4.7, Energy, of the Draft EIR, the Original Project's estimated energy demand in 2022 (9,528 MMBtu, which converts to approximately 3 GWh) represents an extremely small fraction, 0.00075 percent of the regional energy use. The energy use for Modified Alternative 2, the Proposed Project, would also result in a less than significant impact.

C-47.2 As explained in Subsection 4.4.2, Existing Conditions, of Section 4.4, Biological Resources, of the Draft EIR, the project site currently provides limited habitat for wildlife movement, given the density of development within the project region and presence of SR-1 and Main Street. Thus, the site does not provide a valuable wildlife movement corridor through Half Moon Bay. In addition, waste at the project site would be managed appropriately by hotel staff during operation in compliance with the City's Municipal Code (Chapter 18.31, Recycling and Trash Management). The construction activity will comply with the Construction and Debris Waste Management Plan that is required to be submitted to the City as part of the building permitting process.

C-47.3 Please see comment response C-46.1 regarding traffic impacts.

Comment Letter 48, Randy Kearns

From: Randy Kearns
Date: September 12, 2022 5:05 PM

To: HyattHotel
Subject: Hyatt Project
September 12, 2022
RE: New Hyatt Hotel / HMB
To whom it may concern:

As frequent visitors to Half Moon Bay, we are very excited to welcome the new Hyatt Place Hotel to the area. We would love to see something mid-range in price yet being a very nice place to stay.

C-48.1

As of late, because of the lack of places to stay, our visits have been shortened to only one day visits. Our hotel choices right now are either very expensive or overpriced for the value received. Due to not being able to spend the night, our opportunity to dine in HMB is pretty much non-existent because of the travel time and traffic going back home.

We believe that creating more local jobs, supporting local businesses, providing housing and all the while preserving the Wetlands, improving Main Street, the bike and walking paths would only be a positive addition to the HMB community.

We are in favor of this project for Half Moon Bay and look forward to being able to spend more time there.

Respectfully,
The Kearns

Response to Commenter Letter C-48: Randy Kearns

C-48.1 This is not a comment on the adequacy or content of the environmental analysis in the EIR but is noted and will be provided to decisionmakers through the publication of this Final EIR.

Comment Letter C-49, Jeff Corbett

From: Corbett, Jeff
Date: September 12, 2022 3:53 PM

To: HyattHotel
 Subject: statement in opposition to proposed Hyatt hotel – Corbett
 September 11, 2022

Dear city of Half Moon Bay Planning Commission, City of Half Moon Bay City Council, California Coastal Commission and whomever else this transmission may concern,

Regarding construction of a new Hyatt Hotel at the South end of Main St in Half Moon Bay, I and many like-minded townsfolk who are less inclined to speak up have several strong objections to the proposed project:

- C-49.1 1. Water resources – current estimates indicate that the Colorado River watershed is in dire condition. Although the Colorado River watershed does not immediately impact the San Francisco Bay Area per se, even the most simplistic projections indicate a larger, regional water shortage and human transmigration ripple effects are short range in time and evident in nature. Similar studies show that human migration from the California Central Valley to the Coastal Regions due to increased temperatures in the interior are immanent. Given on-going drought conditions that are likely to persist for the indeterminant future over the entire Western Region of the North American continent, the imbalance between water demands and water supply will continue to tip to the demand side with severe shortages on the supply side. These conditions make it easy to conclude for even the most simplistic of mind that construction of new discretionary venues such as hotels and golf courses is not the most prudent course of action, rather altogether irresponsible in nature. A rudimentary educated guess would conclude the proposed Hyatt project falls in this category.
- C-49.2 2. Energy – The recent heat wave that swept across the Western United States (arguably global) placed strain on our regional power generation sources and power transmission systems. Similar to the Water Resources argument outlined above, it does not take a trained analyst to recognize that additional societal ‘luxury’ items such as California coastal hotels (e.g. the proposed Hyatt project) would serve to add additional strain to the power grid. Furthermore, as we are steadily reminded by the experts, electric automobiles and electric home appliances, although currently popular in certain government agency circles, simply serve to delay inevitable complications with carbon emissions on the order of (a few at best) years and in the short term threaten to stress the power grid beyond capacity. So let us not be fooled by false claims of zero-carbon emission facilities – the energy and the energy transmission must come from somewhere and these facilities require carbon-based source at their root to fabricate, maintain and operate. Once again it is not difficult to conclude that construction of the proposed Hyatt hotel would only further exacerbate the problem at this critical juncture in human history.

- C-49.3 3. Traffic– Touching on more mundane topics, having lived in Half Moon Bay for the past 33 years it is clear that traffic congestion has escalated exponentially in time. North/South weekend traffic on Highway 1 North of Highway 92 has become untenable for residents living North of Highway 92 to the extent they often postpone weekend trips into town. Where I live South of Highway 92 (near the proposed hotel construction site) traffic conditions have thickened from a situation where one could literally ‘roll’ a stop sign merging out of Arletta Park onto Highway 1 to conditions where one either waits up to 5 minutes to find an opening or must turn Southbound on Highway 1 and subsequently make an additional left across oncoming traffic and then turn around in order to merge North on Highway 1. On a given weekend traffic backs all the way up to Redondo Road and beyond and ‘cut-through’ traffic consisting of impatient and often inebriated drivers through the Arletta Park neighborhood can persist 9 or 10 at night. A quick glance at a road map indicates that the proposed Hyatt hotel construction falls just at a critical junction where the additional traffic load would increase the traffic problems in arguably non-linear ways.
- C-49.4 4. Solid waste – Although I am not current on the state of the Ox Mountain landfill my cursory understanding is that the facility is nearing capacity and not in need of additional input generated by an additional coastside hotel. Once again it would seem to the casual observer that building such a facility would not only be irresponsible from the point of view of adding more pollution and waste. This would also be inconsiderate and disrespectful towards the citizens of Half Moon Bay who critically rely on this critical infrastructure facility.
- C-49.5 5. Sewer capacity – Once again I am not an expert on the sewer capacity for the Half Moon Bay area and un-incorporated regions to the North, but having read the Half Moon Bay Review consistently for over 3 decades I am aware of the on-going sewer capacity problems. These include future impacts of additional housing in-fill and spill during storm events. It would be wise for the Planning Commission to take a long view of the impacts of the proposed hotel along along with all other projects on the planning horizon as an integrated quantity to see where the situation leads us. The same can be said regarding water, power, traffic and other infrastructure needs.
- C-49.6 6. Economy – Although in my view, at this point in time, ecological considerations should be placed ahead of human accoutrements, any argument that the proposed hotel will stimulate the local economy should be considered with care. As we have seen in the case of the Ritz-Carlton, construction and maintenance jobs often go to workers living outside of the Half Moon Bay area and the City budget soon balloons future estimates to incorporate the new revenue source leading only to new, larger and more complex budgetary problems. Concerning the rally cry ‘South Gateway to Half Moon Bay’ this is at best rubbish put forth by the law firms, architecture firms, financial interests and a few Main Street business establishments. A better term might well be ‘South Blockage to Half Moon Bay’ causing otherwise interested travelers stuck in traffic to leave town asap never to return with associated lost revenue to the City. As is typical for large capital projects of this sort, the brunt of the pain falls squarely on the shoulders of innocent citizens.

- C-49.7 | View corridor – Simply stated and as HMB City officials are acutely aware the proposed Hyatt project violates critical view corridor ordinances.
- C-49.8 | 8. Wetlands – although irrigation measures have already been put in place to drain off storm water the proposed site historically is knee-deep in runoff during even modest storms. Removing this valuable source of fresh water to the adjacent open space to the West will likely have unintended consequences for Coastal Wildlife.
- C-49.9 | 9. Human Infrastructure – The proposed hotel will add additional strain to police, fire, garbage collection, postal and emergency response as well as impede flow of transport to and from places of public education and public amenities such as Library and Town Hall.
- C-49.10 | 10. General – My experience speaking with residents in Arletta Park, Ocean Colony and Alsace Lorraine is that, in general, other than a few scattered personal economic interests, residents including North and South of Half Moon Bay – DO NOT WANT – repeat - DO NOT WANT – and are – OPPOSED TO - construction of the proposed Hyatt Hotel altogether. Most do not speak up out of fear of public speaking, fear of reprisal or lack of awareness of the full consequence to their comfortable standard of living the project threatens to violate.

Thank you for your time and providing the opportunity for public input,

Jeff Corbett
Homeowner
Half Moon Bay, CA 94019

Response to Commenter Letter C-49: Jeff Corbett

C-49.1 Please see Topical Response 3, Water and Hydrology, regarding water supply impacts. The project does not include a golf course.

C-49.2 As discussed in Section 4.7, Energy, of the Draft EIR, the neither the Original Project nor Modified Alternative 2 is anticipated to substantially increase the use of energy in the City of Half Moon Bay. Both would comply with all requirements related to energy usage including California's Energy Efficiency Standards for New Buildings, Title 24, and California's Renewable Energy Portfolio Standard Program. Project implementation would incorporate several sustainability elements to reduce wasteful energy consumption. Mitigation intended to reduce energy consumption includes energy efficient design features of the project, such as on-site EV charging stations and high-efficiency lighting throughout the site. The project would also install glass solar panels on the roof, which would generate approximately three percent of the electricity used on-site.

Project construction would not increase demands on the electric power network during peak and base period demand periods, as construction energy demands would be largely associated with equipment and transportation fuels. Based on the total energy usage of the Original Project, stated in Section 4.7, Energy, of the Draft EIR, the project's estimated energy demand in 2022 (9,528 MMBtu, which converts to approximately 3 GWh) represents an extremely small fraction, 0.00075 percent of the regional energy use.

C-49.3 Please see Topical Response 1, Traffic, regarding traffic impacts.

C-49.4 Republic Services directs all of the solid waste collected in Half Moon Bay to the Ox Mountain Landfill in Corinda, which is a permitted Class III disposal facility that accepts only non-hazardous waste. The landfill currently occupies 191 acres, has a permitted capacity of 60,500,000 cubic yards, and a maximum daily intake of 3,598 tons. As of 2024, the remaining capacity of the Ox Mountain Landfill estimated at 22,180,000 cubic yards.¹ As discussed in Section 4.16, Utilities and Services Systems, of the Draft EIR, the neither the Original Project nor Modified Alternative 2 would generate an amount of solid waste that would exceed the capacity of Ox Mountain Landfill.

¹ CalRecycle, 2024. *SWIS Facility/Site Activity Details, Corinda Los Trancos Landfills (Ox Mountain)*. Available: <https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/1561?siteID=3223>. Accessed: July 2024.

According to CalRecycle, the State agency that oversees the state's waste management, recycling, and waste reduction programs, hotels in California produce between 2 to 4 pounds of solid waste per room per day². At this rate, operations of the Original Project (129 rooms) would produce 516 pounds of solid waste per day, adding less than .01 percent to the 3,598 tons of solid waste the Ox Mountain Landfill accepts daily. Some of the waste generated by project operation would be diverted to green waste and recycling. Because of this waste diversion, project operation would produce an even smaller amount of waste, and there would be adequate landfill capacity for the project. Section 4.16, Utilities and Service Systems, of the Draft EIR, states that the project design and operation would also comply with the City's Municipal Code (Chapter 18.31) requirements regarding the accessibility of the site for waste collection. Modified Alternative 2, the Proposed Project, will have 102 rooms and therefore generate less waste from the hotel, but with the future 16 residential units generating waste as well. Under either circumstance, the impact is less than significant.

C-49.5 As discussed in Section 4.16, Utilities and Service Systems, of the Draft EIR, adequate infrastructure is available to serve the project. Water, sewer, and circulation/transportation system capacity were evaluated in the build-out studies for the recently certified LCLUP. The City's wastewater collection system includes approximately 35 miles of gravity sewer pipe and 1.5 miles of force main pipeline, as well as three lift stations. The City's system conveys approximately 1 MGD of average dry weather flow to the Sewer Authority Mid-Coastside (SAM) wastewater treatment plant. SAM's wastewater treatment infrastructure currently has sufficient wastewater capacity for project operation, and the agency has not identified a need for new expanded wastewater facilities. For additional information about stormwater events (i.e., wet weather flow), see comment response E-2.16.

As discussed in Section 4.10, Hydrology and Water Quality, of the Draft EIR, construction activities would be subject to a National Pollutant Discharge Elimination Discharge System (NPDES) Permit, issued by the Regional Water Quality Control Board, which would contain water quality control requirements. These requirements include the implementation of a Stormwater Pollution Prevention Plan to identify potential pollutant sources and prescribe best management practices (BMPs) to avoid impacts to surface water or groundwater quality during construction. Project operation would be subject to a post-construction NPDES Permit and Provision C.3 requirements,

² CalRecycle, 2019. Estimate Solid Waste Generation Rates. Available: <https://www2.calrecycle.ca.gov/WasteCharacterization/General/Rates>. Accessed: January 2022.

requiring incorporation of source control design elements to prevent pollutants from entering stormwater.

PG&E acknowledged that it will be ready for full electrification of new and existing buildings in Half Moon Bay by 2045. The project would be consistent with Title 24 standards to be energy efficient and would provide a solar panel/photo voltaic (PV) system to provide some of its own energy.

Regarding traffic impacts, see Topical Response 1, Traffic, and regarding water supply impacts, see Topical Response 3, Water and Hydrology.

C-49.6 The EIR analyzes impacts as directed by CEQA and the CEQA Guidelines, and uses thresholds of significance consistent with the *Environmental Checklist in CEQA Guidelines Appendix G*. The EIR does not analyze issues that do not involve the potential for a physical effect on the environment, such as stimulating the local economy.

Please see Topical Response 1, Traffic, regarding traffic impacts.

C-49.7 Please see Topical Response 2, Aesthetics, regarding visual impacts, including the view corridor.

C-49.8 As discussed in Section 4.4, Biological Resources, of the Draft EIR, the design of the project avoids known wetlands on site by incorporating a 1.95-acre wetland and associated 100-foot wetland buffer between the edge of the delineated wetland and the hotel. The proposed wetland buffer is depicted in the project site plan in Chapter 3.0, Project Description of the Draft EIR. The project would also be required to comply with the standards in LCLUP Policy 6-43: Standards in Wetlands and Wetland Buffer Zones, as conditions of project approval.

The project applicant would also implement Mitigation Measure BIO-2a (MM BIO-2a) and Mitigation Measure BIO-2b (MM BIO-2b) to further ensure that the project would not impact any jurisdictional wetlands. MM BIO-2a would require all jurisdictional wetlands and Environmentally Sensitive Habitat Areas (ESHAs) claimed by the California Coastal Commission to be avoided to the extent feasible. This includes direct loss and indirect water quality impacts that could occur due to adjacent development. MM BIO-2b would compensate for lost wetlands by restoring avoided wetlands at a ratio of 4:1.

C-49.9 Regarding impacts on police and fire services and emergency access, please see Section 4.15, Transportation and Traffic, of the Draft EIR and Topical Response 4, Emergency Access and Traffic Safety. Evaluation of project impacts to postal services is not required under CEQA, however, as stated above, traffic impacts are analyzed in Section 4.15 of the Draft EIR, and are also discussed in Topical Response 1, Traffic.

Regarding project-related impacts to utilities, such as solid waste capacity, please see Section 4.16, Utilities and Service Systems, of the Draft EIR. Regarding impacts to public services such as police services, fire protection services, schools and libraries, see Section 4.14, Public Services and Recreation, of the Draft EIR.

C-49.10 This is not a comment on the adequacy or content of the environmental analysis in the EIR but is noted and will be provided to decisionmakers through the publication of this Final EIR.

Comment Letter C-50, Rita Pickering

From: Rita Pickering
Sent: Mon 09/12/2022 1:03 PM

C-50.1 | To: HyattHotel Subject: Hyatt Place EIR
We are concerned about traffic, sewage, water usage, and blocking scenic corridors.
Halfmoon Bay is supposed to be going so called green, another hotel is not needed.

Perhaps we could do something that wouldn't be so impactful and actually benefits the local community, like a nice public swimming pool and park!!!

Response to Commenter Letter C-50: Rita Pickering

C-50.1 Please see Topical Response 1, Traffic, regarding traffic impacts, Topical Response 3, Water and Hydrology, regarding water supply and wastewater capacity Impacts, and Topical Response 2, Aesthetics, regarding visual impacts and LCLUP policies. Comments regarding the design of the project are not comments on the adequacy or content of the environmental analysis in the EIR but are noted and will be provided to decisionmakers through the publication of this Final EIR.

Comment Letter C-51, George Muteff

From: George Muteff
Sent: Sun 09/11/2022 6:11 PM

To: HyattHotel Subject: Hyatt Place EIR
Attn: Jill Ekas

In reviewing the project DEIR, I'd like to address a few of points.

- C-51.1 | Looking at the Staff Report, dated 08/09/22, page 4 of 10 notes Alternative 2. This is, in my opinion, the preferred project (for reasons stated in report).
I appreciate the applicant's project reduction. I also appreciate the design slope of the structures, from south to north. As this is the southern gateway, it should be attractive – and I believe the adjustments to the original project embraces that point.
- C-51.2 | From the LCLUP, 9-23.b, speaks to “minimizing intrusions into the ridgeline”. It appears to me that has been accomplished with Alternative 2. The only way that the applicant can eliminate all intrusions would be to have no project, and I believe that would be a mistake based on the benefits this project provides and supports; starting with visitor serving (commercial).
- C-51.3 | This project will also contribute to HMB's TOT revenue, while guests enjoy all the benefits HMB has to offer. It supports the community. In addition, this project falls into the “town center” from LCLUP.

George Muteff
Half Moon Bay, CA 94019

Response to Commenter Letter C-51: George Muteff

C-51.1 This is not a comment on the adequacy or content of the environmental analysis in the EIR but is noted and will be provided to decisionmakers through the publication of this Final EIR.

C-51.2 As described in Chapter 5, Alternatives, of the Draft EIR, Alternative 2 would reduce the size and scale of the hotel proposed as part of the project, reducing significant impacts to scenic vistas and scenic resources, as compared to the Original Project. Modified Alternative 2 would be consistent with LCLUP Policy 9-23, because the protected view of the ridgeline (available from Viewpoint 3) would not be obstructed by the structures associated with Modified Alternative 2. Also see Topical Response 2, Aesthetics, Topical Response 5, Modified Alternative 2.

C-51.3 This is not a comment on the adequacy or content of the environmental analysis in the EIR but is noted and will be provided to decisionmakers through the publication of this Final EIR.

Comment Letter C-52, Michael Minasi

From: Michael Minasi
Sent: Sat 09/10/2022 6:25 PM

To: HyattHotel Subject: Hyatt Hotel Project

C-52.1

Attent jill ekas, I live in the apartments near by. I think it would be a great idea to bring this hotel into the community. It gives everyone a opportunity to get a job, to bring tourist attention for incoming money for the city, perfect location for views, and more. I am for this hotel and think it will be a big step into the future and to the community.

Response to Commenter Letter C-52: Michael Minasi

C-52.1 This is not a comment on the adequacy or content of the environmental analysis in the EIR but is noted and will be provided to decisionmakers through the publication of this Final EIR.

Comment Letter C-53, Jay

From: Jay
Sent: Friday, 09/09/22 7:58 PM

To: HyattHotel Subject: Hyatt Place Hotel
Attn: Jill Ekas, City of Half Moon Bay

C-53.1 I wanted to state my unequivocal support for the future construction of the new Hyatt Place Hotel. I live in the Bay Area and like many others take weekend drives to this beautiful seaside location. I frequently come here for golf, beach weather and of course the world-famous Half Moon Bay Art and Pumpkin Festival. According to Wikipedia one of the oldest and largest local festivals in California. Anyone who makes this trip knows what the traffic situation is like on any weekend. Many times, I would welcome the ability to stay overnight and enjoy coastal life but there are not enough locally available hotels. I could stay at the Ritz-Carlton but frankly \$756/night is a little over my price range. I want something affordable and close to downtown where I can enjoy the fine local cuisine.

Hyatt Hotels have more than 16 million members. As a member of World of Hyatt they offer me a variety of ways to earn and redeem points for hotel stays. What a great place to use my points. Having a local Hyatt Hotel would be excellent revenue opportunity for the Transient Occupancy Tax (TOT) collected by the city.

I could go on and on, but I think you can see my support for this project, and I know I'm not alone with others saying "let's get it done"

Thank you,
Jay

Response to Commenter Letter C-53: Jay

C-53.1 This is not a comment on the adequacy or content of the environmental analysis in the EIR but is noted and will be provided to decisionmakers through the publication of this Final EIR.

Comment Letter C-54, Jan Gray

From: Gray, Jan
Sent: Friday, September 9, 2022 1:02 PM

To: Jill Ekas Subject: Jamison's Hyatt Project

C-54.1 | I am speaking in favor of Jamison's Hyatt Project at the south end of Main Street at Hwy 1. This parcel represents the gateway to our town, one that should offer dining and lodging choices. After years of studies, plans, revisions and more revisions, the Plan seems to fit in well with our seaside environment, and certainly conforms to all current zoning rules and regulations. The developer is to applauded for investing so much time, talent and money in our Coastside. It's a worthy project, one that enlivens the southern entrance to town; one that will offer choices to our visitors and locals alike.

Jan Gray
Half Moon Bay CA 94019

Response to Commenter Letter C-54: Jan Gray

C-54.1 This is not a comment on the adequacy or content of the environmental analysis in the EIR but is noted and will be provided to decisionmakers through the publication of this Final EIR.

Comment Letter C-55, Jack King

From: JACK KING
Sent: Fri 09/09/2022 11:59 AM

To: HyattHotel

C-55.1 | Subject: Hyatt Place Hotel Ms. Ekas My family and I have lived in Half Moon Bay for over forty years and have always enjoyed the openness of the coast. I believe the proposed Hyatt Place Hotel with its architecture and landscaping will be an added dimension to the southern part of Half Moon Bay. The added support for our local restaurants and small businesses along with added revenue for the city is a positive addition to the city. My personal view is that Half Moon Bay is lacking hotel space during critical times during the year! I've had several occasions in the past that hotel space is unavailable. This is definitely something the city needs and the location couldn't be better!

Thank you for your consideration!

Jack E. King

Response to Commenter Letter C-55: Jack King

C-55.1 This is not a comment on the adequacy or content of the environmental analysis in the EIR but is noted and will be provided to decisionmakers through the publication of this Final EIR.

Comment Letter C-56, Terry Andreotti

From: Terry Andreotti
Sent: Thurs 09/08/2022 7:11 PM

To: HyattHotel
Subject: Proposed Hyatt Place Hotel
Attn: Jill Ekas
Hello,

C-56.1

I just want to say we are in support of the proposed Hyatt Place Hotel. I believe it will help support our businesses and farms in Half Moon Bay. We have a lot of people that just pass through town. If they have the opportunity to stay the night this will create more revenues for our businesses. I like the location of the hotel downtown as it makes it easier for visitors to get around and keeps cars off the road. This project is good for our community.

Thank you,

Dino and Terry Andreotti

Response to Commenter Letter C-56: Terry Andreotti

C-56.1 This is not a comment on the adequacy or content of the environmental analysis in the EIR but is noted and will be provided to decisionmakers through the publication of this Final EIR.

Comment Letter C-57, Tom Carey

From: Tom Carey
Sent: Thurs 09/08/2022 1:27 PM

To: HyattHotel
Subject: <no subject>

Dear City of Half Moon Bay:

This letter is to state my 100 percent support of the Proposed Hyatt Place Hotel to be located in South Gateway of City of Half Moon Bay, CA.

C-57.1 I have followed this application for over 6 years and have found the recent changes the applicant has made to the application to be highly satisfactory and have enabled this project to be one of the best developments- the City will ever produce.

This development creates good local paying jobs which the city desperately needs. It will help support local shops and business and restaurants as it will provide a much needed midrange hotel for visitors to our community to shop and spend money in. The Hyatt Place is a name brand Hotel which the Coastsides doesn't have except for the Ritz Carlton. The Ritz charges 700 to 900 a night which makes it unfordable to most visitors and locals. I have stayed in this brand of Hyatt Place all over the state and have found them very clean and reasonably priced as do many of my friends and workers.

This project provides for 2 acres of open space . It will have walking and bike paths which the community and visitors to our Coastsides will use. It will have bike rentals which the community Desperately needs. This new structure opens up the South Gateway to the city. The design of the structure beautifies the opening to the city we love and cherish.

The Hyatt Place will be collecting an Transient Occupancy Tax in the estimated amount of 1 million dollars(\$1,000,000.00). This is money that can be used for senior services, athletic fields, community events, and etc. each and every year.

My family and I have owned property in the city and its sphere before it was incorporated into a city- some 75 plus years. I have lived here the last 5 and own vacant land near and close to this project. I find that this development improves the city financially and internally and improves the value of property in the city. More so, the developer is a family that lives on the Coastsides and one that breathes the daily grind of life here in Half Moon Bay.

In ending this Hyatt Place will add to the vitality and long standing validity of the town in which my family have grown to admire.

Please move this project forward. It is sorely needed.

Sincerely,
Thomas J. Carey

Response to Commenter Letter C-57: Tom Carey

C-57.1 This is not a comment on the adequacy or content of the environmental analysis in the EIR but is noted and will be provided to decisionmakers through the publication of this Final EIR.

Comment Letter C-58, Tim Norris-Buzzini

From: Tim Norris-Buzzini
Sent: Thurs 09/08/2022 11:54 AM

To: HyattHotel
Subject: Hyatt Place EIR
Attention: Jill Ekas

In regard to the proposed Hyatt Place hotel I would like to provide comments in support. I live in the Central Valley and visit the City of Half Moon Bay periodically with my family. We usually limit these visits to day trips as accommodations either are out of our price range (Ritz-Carlton) or not always available. I've stayed many times at Hyatt hotels and find it a good value with respect to price and quality.

C-58.1 I think this hotel would be a great addition to the downtown area. I like to visit the shops and restaurants along Main Street. It would make it more convenient as they would be within walking distance. We also enjoy the coastal trails, which this location would give us easy access to. We prefer to stay in Half Moon Bay at least one night without having to do a round trip drive, especially on the weekends. We are looking forward to this new hotel in downtown Half Moon Bay.

Thank you for your consideration and we look forward to visiting your beautiful town again.

Tim Norris-Buzzini

Response to Commenter Letter C-58: Tim Norris-Buzzini

C-58.1 This is not a comment on the adequacy or content of the environmental analysis in the EIR but is noted and will be provided to decisionmakers through the publication of this Final EIR.

Comment Letter C-59, Kim Cabassi

From: Kim Cabassi
Sent: Thurs 09/08/2022 10:00 AM

To: HyattHotel
Subject: Hyatt Place EIR

C-59.1 | Hi Jill... I wanted to email you on the Proposed Hyatt Place Hotel in Half Moon Bay...
First of all, we are Hyatt members so this project is something we are very excited to see
coming to Half Moon Bay . We like to visit your area and have stayed at the Ritz Carlton
and the BestWestern, and we are so happy to see that there will be an alternative hotel in the
area. I like the fact that it is a boutique hotel with all the amenities that your town will
greatly benefit. Bringing job opportunities to your city can be nothing short of
advantageous. I love that there will be public bike paths and walking paths. The overall look
of the hotel is beautiful. We will be looking forward to one day staying here at the Hyatt
Place.

Thank you!!!!

Kim Cabassi, Legal Assistant to Gary C. Nelson
LAW OFFICE OF GARY C. NELSON
Modesto, CA 95354

Response to Commenter Letter C-59: Kim Cabassi

C-59.1 This is not a comment on the adequacy or content of the environmental analysis in the EIR but is noted and will be provided to decisionmakers through the publication of this Final EIR.

Comment Letter C-60, Barbara LaVey

From: LaVey, Barbara
Sent: Wed 09/07/2022 1:57 PM

To: HyattHotel
Subject: The Hyatt Project
Good afternoon, Jill,

Just recently I was asked to review the plans for Gregory Jamison's hotel project at the south end of main St in Half Moon Bay.

I think that having another hotel in town would be beneficial to the town for a few reasons, especially at that location.

Firstly, I can't imagine a better use for that lot that is between Main Street and Highway 1 and across from a Fire Station - I couldn't imagine that it would be conducive for residential use and the project will have visual appeal.

C-60.1

Secondly, I believe that having a hotel at the south end of Main Street will bring more vibrancy to that end of the City; I am excited to see the evolution of this section of the otherwise sleepier end. Imagine the people who might decide to come from over the hill to watch a play and stay at the Hyatt!

Lastly, since Mr. Jamison is working within the zoning regulations and by the letter of the law with regards to development, I cannot see why he shouldn't be able to build. The revenue that will be generated, the jobs that will be created and the money that will be spent here as a result of this project are all pluses to us all.

Thank you for your careful consideration with this project,

Barbara LaVey

Response to Commenter Letter C-60: Barbara LaVey

C-60.1 This is not a comment on the adequacy or content of the environmental analysis in the EIR but is noted and will be provided to decisionmakers through the publication of this Final EIR.

Comment Letter C-61, Carol Carolan

From: carol carolan
Sent: Wed 09/07/2022 1:22 PM

To: HyattHotel
Subject: Hyatt Place Hotel - Half Moon Bay
Attention: Jill Ekas

C-61.1 | This is just a brief email to state that my husband and I are in support of the construction of the proposed Hyatt Place Hotel in Half Moon Bay. Extensive planning has gone into the proposal of this hotel and we feel it would be a positive addition to our community.

Sincerely,

Carol Carolan
Half Moon Bay, CA 94019
From: Ingrid Lee Sent: Wed 09/07/2022 9:41 AM To: HyattHotel

Response to Commenter Letter C-61: Carol Carolan

C-61.1 This is not a comment on the adequacy or content of the environmental analysis in the EIR but is noted and will be provided to decisionmakers through the publication of this Final EIR.

Comment Letter C-62, Ingrid Lee

Dear Jill,

C-62.1 I am writing as a resident of Half Moon Bay regarding the project proposal for Hyatt. I am a relatively new resident, moving here from San Francisco at the beginning of 2021. I am deeply concerned with the number of commercial developments under consideration, including the Hyatt project, regarding their potential impact on quality of life in Half Moon Bay. This includes increased traffic on an already congested road in and out of Half Moon Bay (Highway 1 and 92), trash left by tourists on the road and private property (including my property by Venice Beach), environmental impact, illegal parking, and other negative consequences.

I strongly reject this proposal, and wish to communicate this as a consideration for the review.

Thank you,
Ingrid Lee

Response to Commenter Letter C-62: Ingrid Lee

C-62.1 While an evaluation of litter impacts is not required under CEQA, the Draft EIR does analyze whether the project would result in substantial deterioration of a public or recreational facility. As described in Section 4.14, Public Services and Recreation, of the Draft EIR, the project would not have an adverse effect associated with a substantial physical deterioration of recreational facilities, nor would it require new or expanded facilities.

As stated in Section 4.15, Transportation and Traffic, of the Draft EIR, evaluation of parking impacts is not required under CEQA. However, the City will be evaluating parking as part of the project application process. Section 3.2, Project Components, of the Draft EIR, states that the Original Project would include 148 parking spaces, which is greater than either the Half Moon Bay requirement (146 spaces) or the projected parking demand (128 spaces). As stated in Appendix H, Traffic Impact Study, of the Draft EIR, the TDM measures will be applied during construction and operation of the project in order to reduce single-occupancy vehicle trips, parking demand, and total VMT through use of alternative modes of transportation and more efficiently planned trips. As part of the TDM program measures, guests will be provided with information regarding transportation options to the hotel which can help encourage guests to consider non-auto or rideshare options.

Please see Topical Response 1, Traffic, regarding traffic impacts.

Comment Letter C-63, Mimi and David Pasternak

From: Mimi and David Pasternak
Sent: Tuesday, September 6, 2022 12:18 PM

To: Jill Ekas Subject: Hyatt Development Project Proposal Ms. Ekas and Members of the Planning Commission: I have already submitted comments, oral and written, that address specific concerns regarding the Proposed E.I.R. However, after reviewing others citizens' statements, I would like to provide additional commentary.

You have already been flooded with requests, some analytical, some emotional, to approve or deny the project outright, or, in the alternative, refer the application back for further analysis of controversial issues that include: —traffic impact (considered by consultants from a questionable perspective other than truly peak times); and —scenic resource protection of "upland slopes and hillsides" (debated between the 2 sides, who differ in their perception of precisely how much of the view will be obscured).

It is my understanding that your consideration of the E.I.R. is, at this point in time, primarily whether the proposal(s) is/are consistent with the applicable statutes, codes & regulations. If not, your approval will be subject to reversal on administrative or judicial appeal.

More difficult is your consideration of whether the project, even if consistent with the "objective" requirements, violates or offends important concerns relating to Half Moon Bay's expressed policy goal "to preserve (its) small town charm and character." Specifically:

- C-63.1 1) Is this proposed structure "compatible in terms of height, bulk and design with other structures and environment in the immediate area"? (City Code re: Architectural, Landscape and Site Plan Rev., sec. 14.37.035) Many say, myself included, that it is not.
- C-63.2 2) Even if specific impacts are, correctly or incorrectly deemed "minor" shouldn't you, as stewards of our town, be concerned with the cumulative effect of ongoing impact on our community from projects you have and will continue to approve? In that vein, this Labor Day Holiday saw gridlocked traffic, not from any one source, but from the cumulative impact of many "projects". Likewise, I note that the trees and buildings at the South end of main street do partially block the view, but that's hardly a basis to ignore the cumulative impact of the proposed Hotel on the remaining scenic corridor we enjoy.
- C-63.3 To summarize my position: I am not an opponent of private property or development, per se. I'm not a N.M.B.Y., having supported most of the housing and commercial development that came long after our residence here on the Coast. What I oppose is construction that degrades our aesthetic environment, is unnecessary for the community's welfare, and benefits only a narrow private interest. You should, at the very least, require further study before seriously considering approval of this project.

Thank you for your consideration of my comments.

David Pasternak

Response to Commenter Letter C-63: Mimi and David Pasternak

C-63.1 Please see Topical Response 2, Aesthetics, for a description of visual character.

C-63.2 Please see Topical Response 6, Cumulative Impacts for discussion of cumulative traffic impacts.

C-63.3 Please see Topical Response 2, Aesthetics, regarding impacts to visual resources.

Comment Letter C-64, Nichole Metz

From: Nichole Metz
Date: Sat 9/3/2022 5:23 PM

To: HyattHotel
Subject: Hyatt Place EIR
Good Evening Jill,

C-64.1 | I am emailing to give my opinion comments re the Hyatt Hotel. I think this will be a benefit to our community (similar to The Ritz!). The Hyatt is going to provide locals with varying levels of jobs. Also, opportunity for tourist to stay at accommodations on the south side of town but the price point is much lower than The Ritz. It will also put money into the community through restaurants and shops.

I think this will benefit our little coastside community tremendously!

Sincerely,

Nichole Metz | Realtor® DRE#: 02071647 - Half Moon Bay

Response to Commenter Letter C-64: Nichole Metz

C-64.1 This is not a comment on the adequacy or content of the environmental analysis in the EIR but is noted and will be provided to decisionmakers through the publication of this Final EIR.

Comment Letter C-65, Jim and Teri Mercurio

JIM MERCURIO

Date: Sat 9/3/2022 2:59 PM

To: HyattHotel

Subject: Hyatt Hotel Project

Dear HMB Council, City Staff & Planning Commission:

I wanted to take a moment to write in support of this Hyatt Hotel project being considered in HMB, CA.

C-65.1 | After reviewing the EIR and even listening to several planning commission meetings myself, I feel that the staff and commission has done a great job in not only making sure the applicant and the project meets the necessary requirements as best one could, but also being mindful of the size and scope of this project. Your previous comments were on point and I appreciate the applicant's response in making most, if not all, of your requested adjustments.

There could have been several other iterations for land development in this space, none of which would have been more beneficial to the City, to its residence and to visitors like myself. There is no doubt that my family and I will appreciate having this mid-range hotel offering that is currently being considered; allowing us to spend more quality time in downtown HMB.

Thank you in advance for your support of this project and to the community looking to visit your great City more often.

Sincerely,

Jim & Teri Mercurio

Response to Commenter Letter C-65: Jim and Teri Mercurio

C-65.1 This is not a comment on the adequacy or content of the environmental analysis in the EIR but is noted and will be provided to decisionmakers through the publication of this Final EIR.

Comment Letter C-66, Denise Rundle

From: Denise Bernardini Rundle
Sent: Tuesday, August 30, 2022 8:32 AM

To: Jill Ekas Subject: Half Moon Bay Planning Commission

Dear Jill Ekas and the other members of HMB Planning Commission. I'm contacting you in great hope you will have time to read and consider this. My name is Denise Rundle, myself and husband Chuck bought our first home here over 20 yrs ago. To be exact in the Frenchmens Creek Subdivision. I'm not going to get technical or throw EPA environmental reports at you or other statistics to sound like I know everything.

C-66.1 | What I do know. This Hyatt Hotel thing is really bad. It's not going to look good, quite frankly it's ugly. Tourist come here only for a few things. The beaches, quaint Main St and MAYBE fresh seafood at SAMS Restaurant.

C-66.2 | The hotel/motels & quaint B&B's and not to mention the scattering of AirBNB's in the area (Coastside) have trouble now filling rooms now and before the pandemic. The Marriott did go up at Dunes (thank you). We (HMB & entire Coastside) simple does not have the infrastructure to accommodate more hotels, people and more importantly vehicles.

C-66.3 | Not just cars. But more delivery trucks, more traffic it's just not good. I understand it will mean more money for us. But money is not the answer to everything. I'd rather pay more property tax and still be able to walk to the beach and watch a sunset. We don't really have huge events here. The ONLY event that occurs annually that people actually drive here for is Pumpkin Festival. That one weekend is our big draw (I can guarantee those people are not going to pay Hyatt prices for a street fair) Night of lights and other little parades and celebrations are primarily local activities.

C-66.4 | We do not need more hotels. We need to support our quant B&B's that are suffering already. Yes, the Ritz Carlton is kind of out of sight and they did a good job "hiding it" ...yet, how often are they full? The Oceania Hotel at the Harbor is suffering. That entire project has been struggling. The restaurant keeps changing hands, now La Castanera is in that space. The "Mall" is a joke. If they were able to get a decent anchor store they would be doing much better and maybe less residents would have to drive over the hill to buy something. Instead of building useless hotels, think more about an anchor store for that little strip mall. Remember the "general store" above Cunha's Market? I don't know how they did it but they literally sold everything. That's gone. We need 1 store that had mostly everything like a Target, something like that behind the mall or connected someway. That's what we need. Our Safeway is the smallest and oldest in Safeway history. New Leaf is pricey. (We begged Trader Joe's & Whole Foods, but they said our population, residents were not enough to support them). That was a long time ago, maybe Target or other grocery & merchandise store will come in. (So Lake Tahoe had Rally's, a grocery section, clothing section, fishing/sports section, general merchandise) it wasn't that large and it was awesome. Can we do something like that at that mall?

C-66.5 I'm sorry for rambling. I'm just trying to reach you on a human level instead of spiting out facts. True fact is, the location is BAD. (You already wrecked the entrance hiding our little half moon) now it's all confusing and ugly. If you HAVE to build with Hyatt due to promises or whatever. Change the location. Get off Cabrillo Highway. Keep the quaint village in mind. Can they build in town near Main St. Isn't there a lot of land/ lots East of Main St? Less rooms, 2 stories only they may getaway with 3 if it has a Victorian or Prohibition areas look and design. Again no more then 25-30 rooms. Even that is too many. Most people will still have a fit. But at least it won't be in the middle of our lovely little entrance. There has to be better places. Even the end of Wavecrest somewhere. Hide it and not big. But I still think our infrastructure can't handle it. The Sheriff can't handle the growing crime rate now. We are already rationing.....everything. Please don't make things worse. Figure something else out. Back to the drawing board?

By the way, some people are weird and get weirdly passionate about stuff like this. I don't know, when they don't get their way and feel ignored they do sometimes hurtful things. Just be careful and please please please at the very least move the eyesore elsewhere.

Good luck, I know you can't make everyone happy and you all have tough jobs, I appreciate your time and efforts.

Denise Bernardini Rundle
Half Moon Bay, Ca 94019

Response to Commenter Letter C-66: Denise Rundle

C-66.1 This comment is noted and will be provided to decisionmakers through the publication of this Final EIR. Please see Topical Response 2, Aesthetics, regarding impacts to the visual character.

C-66.2 As described in Section 3.0, Project Description of the Draft EIR, the project would be consistent with the City's project objective of meeting demand for branded and reasonably affordable hotel rooms to support Half Moon Bay's growing local tourist and agribusiness economies. Past studies indicate that there is adequate visitor demand on the coast to support the project. The Chamber of Commerce cites an average occupancy rate of 68 percent and has found the need for conference facilities which can support mid-week hotel demand with is off-peak from the high weekend demand. The proposed hotel would be mid-range, featuring more amenities than a budget hotel, but would be lower in cost than a luxury hotel, to fill a gap in the market. Please see Topical Response 1, Traffic, regarding traffic impacts.

C-66.3 This comment is noted and will be provided to decisionmakers through the publication of this Final EIR. Please see comment response C-66.2 regarding traffic impacts.

C-66.4 This comment is noted and will be provided to decisionmakers through the publication of this Final EIR. Please see comment response C-66.2 regarding visitor demand.

C-66.5 In addition to the No Project alternative (Alternative 1), the Draft EIR also analyzed a Reduced Density alternative (Alternative 2) which has since been modified (see Topical Response 5, Modified Alternative 2), and a Multi-Family Residential alternative (Alternative 3) in Subsections 5.5.1 through 5.5.3 of the Draft EIR. CEQA Guidelines Section 15126.6(c) requires that an EIR identify any alternatives that were considered by the Lead Agency but rejected as infeasible. The EIR must briefly explain the reasons underlying the Lead Agency's determination to reject an alternative. The following factors may be used to eliminate alternatives from further consideration: (i) failure to meet most of the basic project objectives, (ii) infeasibility, and (iii) inability to avoid significant environmental impacts. Please see Section 5.4, Alternatives Considered but Rejected for Further Analysis, and Section 5.4.1, Alternative Site Locations, of the Draft EIR, for information regarding alternatives considered but rejected for further analysis, and alternative project site locations that were considered but rejected for further consideration.

Crime rate is not a CEQA issue and was not analyzed in the Draft EIR. This is not a comment on the adequacy or content of the environmental analysis in the EIR but is noted and will be provided to decisionmakers through the publication of this Final EIR.

Comment Letter C-67, Rocquelle Spencer

From: Wagondrgn
Sent: Sat 8/27/2022 10:59 AM

To: HyattHotel
Subject: Hotel

C-67.1 | As a local I'm much in favor of this hotel. It will provide jobs for the community as well as
revenue for the City of Half Moon Bay. The local downtown businesses are only a short walk
away and surely will profit from the guests.

Thanks
Racquelle Spencer

Response to Commenter Letter C-67: Racquelle Spencer

C-67.1 This is not a comment on the adequacy or content of the environmental analysis in the EIR but is noted and will be provided to decisionmakers through the publication of this Final EIR.

Comment Letter C-68, Suzanne Bergin

From: Suzanne Bergin
Sent: Thu 8/25/2022 1:12 PM

To: HyattHotel

C-68.1 Subject: Attn Jill Ekas Hello... Just wanted to comment on the proposed Hyatt Hotel in Half Moon Bay, California. I am not a resident of the area but I enjoy visiting this area often and I'm thrilled there might be the option of a hotel like this in the near future. Half Moon Bay is a wonderful town with so much to discover in town or at the beautiful beaches, the proposed hotel will be so beneficial to people who want to spend more than just an hour or two visiting the area. I hope to see these plans come to fruition in the near future. The creation of jobs and many other reasons it will benefit the community while also bringing something incredibly tasteful and comfortable for visitors coming to the beautiful Bay Area. Thank you for taking these comments into consideration for the proposed hotel.

-Suzy Bergin

Response to Commenter Letter C-68: Suzanne Bergin

C-68.1 This is not a comment on the adequacy or content of the environmental analysis in the EIR but is noted and will be provided to decisionmakers through the publication of this Final EIR.

-----Original Message-----

Comment Letter C-69, Mimi and David Pasternak

From: Mimi and David Pasternak [REDACTED]
Sent: Monday, August 8, 2022 3:02 PM

To: hyatthotel@hmb-city.com; Jill Ekas [REDACTED]
Subject: Hyatt Developmenr Project
[CAUTION]: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

C-69.1 | Members of the Planning Commission:
Thank you for the opportunity to express my concerns regarding the Draft E.I.R. that is before you for consideration. I have resided full time on the San Mateo County Coastside for about 40 years, and though I retain fond memories of a more pristine environment, our little town's development has provided benefits to me, my friends and my neighbors.

I have no fantasy of a return to some mythical, past golden age, and accept the inevitability and need for some change to to meet the needs of us all, particularly the less privileged among us.

The Hyatt project, as currently proposed, whether in original or "scaled back" form, is not a change that would benefit the community and, as set forth in more detail below, should be reevaluated by Staff in order to present a plan that is consonant with maintaining our small town character, providing for the public benefit, and protecting the scenic vistas. Specifically:

C-69.2 | 1) Infrastructure concerns, including traffic, water and housing units have not been satisfactorily addressed.

—page 15-15 of the E.I.R.'s Transportation & Traffic section claims that the traffic generated by the project would not create "traffic flow that would exceed Caltrans & local standards." Many would argue that Caltrans' prior predictions and planning have hardly been stellar, and there are particular concerns here, based on 2 factors.

First is the specific issue of the construction crews, expected to be on site for an extended period. Those workers, many more than the 30+ post completion employees, will be further clogging SR-1 and SR-92 during commute hours.

A second matter is what seems a disingenuous conclusion by the end traffic consultants that, while admittedly "counterintuitive", the effect of the increased traffic generated by the Hyatt would cause "average delay at the intersection of SR-1 and SR-92 to decrease during the a.m. peak." (see Appendix H, page 27, following Table 10.) I am not a traffic engineer, but am a literate former commuter. I just don't get it!

C-69.3 | 2) Violation of Guidelines Concerning Visual Impairment Will Have To Be Sanctioned
There appeared to be clear acknowledgment in the Draft E.I.R. of July, 2022 that both the "original" and pared down plans for hotel construction would cause "significant and unavoidable" impacts on the scenic views. (See Executive Summary, Table 2-1 and section 2.2.3). Those impacts are just not subject to remediation or mitigation. Water sources and roads may be improved to correct bad planning, but a view can not be restored.

C-69.4 | I suspect that some development on the site in question will, at some point be permitted and, perhaps, even enthusiastically supported by the community. This is not such a development. If, in fact, you do want what is best for Half Moon Bay and our still (relatively) uncontested and scenic Coastsides, I urge further Staff study, including communication with the Applicant in order to come up with a project that is palatable to us all.

Thank you for your consideration and hard work.

David J. Pasternak

Response to Commenter Letter C-69: Mimi and David Pasternak

C-69.1 Please see Topical Response 2, Aesthetics, regarding impacts to the visual character and scenic vistas.

C-69.2 Construction traffic impacts were analyzed in Appendix H, Traffic Impact Study, of the Draft EIR, and further discussed in Topical Response 1, Traffic. Prior to the start of construction activities, the contractor will prepare and submit a detailed construction management plan for City approval. The construction management plan will indicate the days and times of construction, the duration of each construction activity, where workers will park, truck haul routes, the number and type of trucks that will access the site during each construction activity, and other details. The City will require that adequate access for all transportation modes, especially emergency vehicles, be maintained during construction.

The reason for decreases in average delay at an intersection when project-related vehicle trips are added is explained on page 27 of Appendix H, Traffic Impact Study, of the Draft EIR, which states *"It should be noted that with the addition of project-related traffic volumes, average delay at the intersection of SR-1/SR-92 would decrease during the a.m. peak hour. While this is counter-intuitive, this occurs when trips are added to movements that are currently underutilized or have delays that are below the intersection average, resulting in a better balance between approaches and lower overall average delay. The conclusion could incorrectly be drawn that the project improves operation based on this data alone; however, it would be more appropriate to conclude that the project trips are expected to make use of excess capacity, so drivers would experience little, if any, change in conditions as a result of the project at these locations."*

C-69.3 Please see Topical Response 2, Aesthetics, regarding visual impacts.

The commenter correctly notes that the project would result in a significant and unavoidable impact on aesthetic resources, particularly scenic views. Under CEQA, a significant and unavoidable impact on the environment is defined as an impact that would cause a substantial adverse change in the physical environment that cannot be avoided, even with the implementation of recommended mitigation or where no feasible mitigation is available.

Project implementation would include project design treatments/asures to minimize visual intrusions at the project site; however, implementation of the Original Project would still obstruct the long-range views of the ridgeline (scenic resource) as viewed from northbound SR-1 approaching the project site from the south. There are no other feasible measures available to address this impact, as there is no measure that would reduce the impacts to this scenic resource given the mass and scale of the project.

Therefore, this Original Project impact would be considered significant and unavoidable (Impact AES-1 and Impact AES-2).

Project design was developed with the intention of reflecting the visual character and visual quality of the project site's surroundings, as well as maintaining the quality of public views to preserve the heritage and character of the city. Although the project would incorporate high quality design elements, landscaping, and screening techniques, the visual quality of the project site as seen from public viewpoints is conservatively considered to be adversely affected by the project, given the circumstances of the project site and the proposed development. Therefore, this impact is considered significant and unavoidable (Impact AES-3).

Modified Alternative 2, the Proposed Project, will have lesser Aesthetic impacts than the Original Project, which is described further in Topical Response 2: Aesthetics.

C-69.4 This is not a comment on the adequacy or content of the environmental analysis in the EIR but is noted and will be provided to decisionmakers through the publication of this Final EIR.

Comment Letter C-70, David Schorr

Dear Ms Ekas;

In discussion of the DEIR, a question has come up with reference to the Visual Impact simulations.

This is an important issue, as acknowledged by the DEIR, indeed it is the crux of the issue for this proposed project, it must be accurate. And in this, geometry matters.

Can you determine or provide info as to the height above ground level for the POV (point of view) for the simulations in the DEIR. The average eyeball of the average human in the average vehicle sits at about 48" (4 feet) above grade, as they transit Rt 1 approaching and past the hotel.

C-70.1

From previous work on visual simulations, it was seen that Google Earth, which feeds into SketchUp and similar softwares, uses a POV that goes no lower than 7 feet above grade, or 84".

So, the POV used in these studies is critical to know - That difference of 3 feet, applied from Rt 1, across the roofline of the proposed complex at 34', projected against the protected hills in the distance, makes a significant difference in the actual visual impact. If a 7' reference was used, the visual simulations should be re-run, adjusting for a 48" eyeball height to give true representation of impacts, which will be worse at 48" as compared with 84".

This is purely geometry - a small change in the angle at the base of the viewpoint makes a big difference a mile or miles in the distance, on the protected visual resources.

As the existing story poles and flag lines are now degraded and sagging, the public (and staff and Planning Commissioner) is deprived of the opportunity to properly assess this.

Thank you for your attention to this, hopefully this can be a point of discussion at the upcoming Study Session.

Dave Schorr
Half Moon Bay
[REDACTED]

Response to Commenter Letter C-70: David Schorr

C-70.1 Please Topical Response 2, Aesthetics, regarding visual impacts.

The existing condition and simulation photos in Section 4.1, Aesthetics, (pp. 4.1-25-4.1-28) of the Draft EIR were taken approximately from grade at standing eye level (48"-56") for each viewpoint. The photograph looking east across SR-1 was taken from the existing bicycle path. The bicycle path is a few feet lower than the surface grade of the roadway.

Viewpoints were selected to be representative of the most critical locations from which the project would be seen. They were selected based on their usefulness in evaluating existing landscapes and potential impacts on protected visual resources pursuant to the Local Coastal Program, which includes views of upland slopes from SR-1.

Visual simulations were created for each key viewpoint to create an analytical comparison of the existing condition and the proposed condition for the project site to identify potential visual impacts resulting from implementation of the project.

Comment Letter C-71, Brian Holt

From: Brian Holt [REDACTED]
Sent: Tuesday, August 9, 2022 9:29 AM
To: Jill Ekas [REDACTED]; Bridget Jett [REDACTED]
Subject: Item 1A Hyatt Place

Dear Planning Commissioners -

Thank you for the opportunity to provide comments on the proposed Hyatt Place hotel located on the southern end of Main Street.

C-71.1 | Activation of the southern end of Main Street has been a long held goal of this community and has been identified in various planning documents including the Downtown Specific Plan and the recently adopted General Plan and Local Coastal Plan. The site of the proposed Hyatt Place hotel, in particular, has been referred to as the "southern gateway" to Downtown Half Moon Bay. Your continued diligence and thoughtful review of this proposal at this important site is warranted and greatly appreciated.

C-71.2 | The COVID-19 pandemic has increased the public's awareness of the importance of high quality and accessible outdoor experiences. Park and open space agencies throughout the Country have reported visitation increases anywhere from 150% to over 500%. No doubt, as the public has rediscovered their love of the outdoors, they will continue to seek such outdoor recreation experiences. Here, on the Coastside, we are blessed with abundant access to the outdoors. It is incumbent on us, as an inclusive and welcoming community, to support access to the coast to all Californian's.

C-71.3 | There is, and will continue to be, a growing demand for visitor serving facilities on the Coastside. We are faced with a choice on how we accommodate this growing demand. We have recently restricted short-term rentals in our neighborhoods to protect neighborhood character. There is significant concern about development of visitor serving uses west of Highway 1 at Dunes Beach. Identifying appropriate locations to provide visitor serving facilities in a sustainable manner that supports our local businesses will be key to maintaining our quality of life and small town character while embracing an outdoor recreation based economy.

C-71.4 | The Hyatt Place proposal located east of Highway 1 at the gateway to Downtown Half Moon Bay seems like the appropriate location to provide visitor serving uses. And the scale of the current proposal feels appropriate to maximize the utility of the site without overwhelming surrounding land uses.

C-71.5 | The California Environmental Quality Act (CEQA) is instructive in helping decision makers identify project impacts and to identify measures to avoid, minimize, or mitigate such impacts. The thorough Environmental Impact Report effectively addresses the issues required under CEQA.

- C-71.5
Cont. | Where CEQA becomes more difficult is in matters of subjectivity. Visual Resource analysis is a prime example. While City code does provide for the protection of certain views from public corridors, there is no way that every view from every viewpoint can be protected. So while some will argue that views will be obstructed by the proposed project, an equal argument could be made that views are retained from the north of the site and from the south. The project has been modified, with significant input from the Architectural Advisory Committee and Planning Commission, to minimize such impacts and to provide a design that is complementary with its setting.
- C-71.6 | CEQA also fails to adequately analyze the beneficial impacts of a project. The current project site is a fallow field. The car dealership provides the visual backdrop to our southern gateway. While the proposed project may obstruct certain views of the eastern hills as viewed while passing the site, the development of a highly attractive agriculturally themed hotel could be seen as a vast visual improvement for the southern gateway. The agricultural themes support the General Plan goals of maintaining and enhancing our communities agricultural heritage.
- C-71.7 | Further, CEQA doesn't effectively analyze the impact of doing nothing. If we fail to address the growing demand for visitor facilities on the Coastside, we risk creating demand where the impacts could be greater. Increased demand for short-term rentals in our neighborhoods could have a long list of impacts and contribute to ongoing enforcement challenges. Lacking visitor serving facilities east of Highway 1 could increase demand for such facilities west of Highway 1 in a manner that could impact coastal views and access.
- C-71.8 | This is a major project for our community and, again, your thoughtful consideration is much appreciated. As with any major project, there will be significant public concerns that should be taken seriously and considered. However, the current project is the reflection of many hours of input from the public, staff, and members of the Architectural Advisory Committee and Planning Commission.
- C-71.9 | We should feel confident supporting a project that will welcome people to the Coastside, that visually supports our communities agricultural heritage, that helps activate our Downtown, and will provide an attractive entrance at our southern gateway.

Thank you,
Brian Holt
[REDACTED]
Half Moon Bay, CA

Response to Commenter Letter C-71: Brian Holt

C-71.1 This is not a comment on the adequacy or content of the environmental analysis in the EIR but is noted and will be provided to decisionmakers through the publication of this Final EIR.

C-71.2 This is not a comment on the adequacy or content of the environmental analysis in the EIR but is noted and will be provided to decisionmakers through the publication of this Final EIR.

C-71.3 This is not a comment on the adequacy or content of the environmental analysis in the EIR but is noted and will be provided to decisionmakers through the publication of this Final EIR.

C-71.4 This is not a comment on the adequacy or content of the environmental analysis in the EIR but is noted and will be provided to decisionmakers through the publication of this Final EIR.

C-71.5 This is not a comment on the adequacy or content of the environmental analysis in the EIR but is noted and will be provided to decisionmakers through the publication of this Final EIR. Please see Topical Response 2, Aesthetics, for a description of regarding impacts to visual quality.

C-71.6 This is not a comment on the adequacy or content of the environmental analysis in the EIR but is noted and will be provided to decisionmakers through the publication of this Final EIR.

C-71.7 This is not a comment on the adequacy or content of the environmental analysis in the EIR but is noted and will be provided to decisionmakers through the publication of this Final EIR.

C-71.8 This is not a comment on the adequacy or content of the environmental analysis in the EIR but is noted and will be provided to decisionmakers through the publication of this Final EIR.

C-71.9 This is not a comment on the adequacy or content of the environmental analysis in the EIR but is noted and will be provided to decisionmakers through the publication of this Final EIR.

Comment Letter C-72, Dennis Kleinbach

From: Dennis K Kleinbach [REDACTED]
Sent: Tuesday, August 9, 2022 9:41 PM\

To: HyattHotel <HyattHotel@hmbcity.com>
Subject: Working FOR the citizens of Half Moon Bay

On many weekends the citizens of Half Moon Bay are effectively PRISONERS IN THEIR OWN HOMES due to the overwhelming increase in traffic of the last few years. So why would the town now consider adding another hotel when the existing Coastside Hotels are not full? Why would the town insist on burdening the citizens of half Moon Bay with even more traffic?

C-72.1

129 Additional rooms of the proposed Hyatt Hotel means that cars will be coming to the hotel and then going to meetings or restaurants for a minimums (if not more) of 258 additional cars on the roadways and especially on Highways 1 and 92. On top of this is the 20 plus cars---40 round trips for the staff of the hotel plus delivery vehicles means that this hotel will be responsible for adding an additional 300 plus cars to the roads each and every day of the week and especially on weekends.

Why would the town purposely decide to add a minimum of 300 plus additional cars per day to the roads of Half Moon Bay when the roads are already overcrowded as we only have one to the roads of Half Moon Bay when the roads are already overcrowded as we only have one north-south road (Highway 1) and one west -east road (Highway 92)?'

And worse yet, the Hotel chain is not even locally owned and will be managed from and by others from outside of Half Moon Bay?

C-72.2

Why does the town not take the right decision and let the citizens of Half Moon Bay vote on this issue as it will be the citizens who will bear the brunt of the additional traffic? Why should those (the town council) who have done NOTHING to alleviate the traffic loads now make the decision to bring in even more traffic? How is this being responsible representatives? How is this "improving the lives" of Half Moon Bay residents? It is not!

I, therefore, ask that the citizens of Half Moon Bay be given the right to vote on the issue of allowing a Hyatt Hotel (or any other hotel) to add over 300 vehicles to the roads of Half Moon Bay. If the citizens of Half Moon Bay think that allowing another hotel to be built will improve their individual lives, I would like to hear how.

Dennis Kleinbach
Half Moon Bay, CA [REDACTED]

Response to Commenter Letter C-72: Dennis Kleinbach

C-72.1 Please see Topical Response 1, Traffic, regarding traffic impacts.

C-72.2 This is not a comment on the adequacy or content of the environmental analysis in the EIR but is noted and will be provided to decisionmakers through the publication of this Final EIR. CEQA Guidelines Section 15002(j), requires public agencies to solicit and respond to comments from the public and other agencies concerned with the project as part of the environmental review process. (See also CEQA Guidelines Sections 15086, 15087, and 15088.) Please see Appendix A-1, Notice of Preparation and Scoping Meetings, of the Draft EIR regarding public outreach for the project. Please see Topical Response 1, Traffic, regarding impacts to traffic.

Comment Letter C-73, Mimi and David Pasternak

From: Mimi and David Pasternak
Sent: Tuesday, August 9, 2022 1:36 PM

To: Jill Ekas
Subject: EIR re Hyatt (supplemental statement)
Hi Jill,

Thanks for forwarding my misdirected prior statement to the Commission and for your consideration of that communication.

I would also request your review of the following.

First, a more careful proofreader than myself noted that my closing comment referred to the still “uncontested” condition of our environment. That reference should read “uncongested.”

Second, in regard to the traffic issue, 2 matters require clarification.

C-73.1

—Traffic volume and flow have not yet returned to preCovid volume, and looking back to the conditions some 3-5 years ago, there was great concern as to whether we could then deal with the traffic volume. (As a dramatic aside, one of our neighbors went into labor on a sunny Fall day and had to travel toward the Peninsula via Tunitas Creek Road because of congestion on SR-1.

She got only as far as the Kings Mt. Firehouse, where she gave birth to a healthy baby!)
-----In assessing baseline conditions, the commute periods are important, but the major period of congestion, in my experience, are weekend afternoons and early evenings, when day trippers are heading home. It’s not slowing or even bumper to bumper, but gridlock, with intrepid road warriors using Main Street as an alternate route .

And, remember, beach season is no longer coinciding with Summer vacation; we live in a year round tourist destination.

Thank you for your consideration .
Best wishes,
David Pasternak

Response to Commenter Letter C-73: Mimi and David Pasternak

C-73.1 Please see Topical Response 1, Traffic, regarding traffic impacts. The method used to determine the existing conditions baseline is explained in Section 4.15 (page 4.15-6) of the Draft EIR and discussed further in Topical Response 1, Existing Conditions Scenario. According to W-Trans, the transportation specialist for the project, traffic volumes and patterns were significantly modified during the pandemic and would not have been appropriate baselines; therefore, traffic impact analyses using pre-pandemic data as the baseline are considered more representative of typical traffic conditions.

As required by CEQA, the project's potential generation of Vehicle Miles Traveled (VMT) was calculated. Because the City of Half Moon Bay has not yet adopted a standard of significance for evaluating VMT, guidance provided by the California Governor's OPR in the publication Transportation Impacts (SB 743) CEQA Guidelines Update and Technical Advisory, 2018, was used.

Comment Letter C-74, David Schorr

FROM: Dave Schorr

Date: August 22, 2022 2:44 PM

TO: HyattHotel

C-74.1 | Hello - Following up on this request from Aug 8 for eyeball height delineation - I am on a very tight timeline to complete comments on the Draft EIR, and this clarification would be appreciated.

Thank you!

Response to Commenter Letter C-74: David Schorr

C-74.1 Please see comment response C-70.1 and Topical Response 2, Aesthetics, regarding visual impacts.

Comment Letter C-75, Rick Southern

Rick Southern 08/08/2022

Hi Jill,

I am a member of a community group trying to better understand the Hyatt Hotel proposal and would it would entail for Half Moon Bay.

In reading the city's executive summary we came upon a passage we hoped you could clarify. The passage:

C-75.1 "Significant impacts and their associated mitigation measures or standard conditions are summarized in Table 2-1. Each of the impacts described above would be avoided or reduced to a less-than-significant level with the implementation of mitigation measures or standard conditions of approval, except for impacts to aesthetic resources, including impacts to scenic vistas, scenic resources, and to the overall visual character of the area. These impacts to aesthetics resources are considered significant and unavoidable and are described further in Section 2.2.3, Significant and Unavoidable Impacts. "

This seems to say that there are significant and unavoidable aesthetic impacts. Then it seems to say these impacts can be made insignificant with mitigation, and then, further in the body of the document, calls them significant and unavoidable. Can you clarify what the city is saying here?

Thank you so much for responding,
Rick

Response to Commenter Letter C-75: Rick Southern

C-75.1 Please see Topical Response 2, Aesthetics, regarding visual impacts.

Table 2-1, Summary of Impacts and Mitigation Measures, lists all of the significant impacts of the project, feasible mitigation measures if any, and the significance conclusion for each significant impact. As explained in Section 2.2.3, Significant Unavoidable Impacts, of the Draft EIR, a significant and unavoidable impact is defined as an impact that would cause a substantial adverse change in the physical environment that cannot be avoided, even with the implementation of recommended mitigation or where no feasible mitigation is available. For Original Project impacts such as AES-1, AES-2 and AES-3, there are no feasible mitigation measures; therefore, these impacts are “significant and unavoidable” as shown in Table 2-1 and further discussed and analyzed in Draft EIR Section 4.1. The impacts of Modified Alternative 2, the Proposed Project, are discussed in Topical Response 2: Aesthetics and Topical Response 5: Modified Alternative 2.

Comment Letter C-76, Dave Schorr

From: [REDACTED]
To: [REDACTED]
Cc: [REDACTED]
Subject: Fwd: Hyatt - elevations
Date: Monday, August 8, 2022 6:53:01 PM

Sent from my iPhone

Begin forwarded message:

From: Dave S [REDACTED]
Date: August 8, 2022 at 6:50:26 PM PDT
To: Jill Ekas [REDACTED]
Subject: Hyatt - elevations

[CAUTION]: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Ms Ekas -

I am looking at pps 456 and 457 of the DEIR. Bldg 1 ridge height is given as 122'2", and Bldg 2 ridge height 122'9".

C-76.1

First, it is curious that a 2 story building is only 7" shorter than a 3 story building - that maintains consistent impact on protected visual resources across the 452 foot length of the project.

However, and my question here, is that I do not see a reference to BASE elevation for the project, from which we can calculate total height above existing grade. I may be missing something in the drawings, but do not see it. This seems a basic bit of info which really should be on the drawings.

Thank you, if you can provide this one simple (but important) data point.

Dave Schorr
HMB
[REDACTED]



Virus-free www.avast.com

Response to Commenter Letter C-76: David Schorr

C-76.1 Please see Topical Response 2, Aesthetics, regarding visual impacts and story poles.

An informational sign regarding the need for the story poles, and details of the project were displayed alongside the story poles. For information about the elevation of the Original Project, see Figures 3-5, 3-6, 5-2, and 5-3 of the Draft EIR.

Robert E. Moody, D.M.D.
A Professional Corporation
Family & Cosmetic Dentistry



Comment Letter C-77, Robert Moody

9-1-22

538 Main Street
Half Moon Bay, CA 94019
650.726.9046
www.DrMoody.com
inquiry@drmoody.com

RE: HYATT PLACE DRAFT EIR
501 MAIN ST.

- C-77.1 I MUST PROTEST AGAINST THIS PROJECT.
HALF MOON BAY IS A UNIQUE JEWELL ON
THE COAST. THIS PROJECT WOULD DESTROY
SCENIC VIEWS AND BE A DISASTER TO
OUR WONDERFUL TOWN. WE DO NOT NEED
MORE HOTELS, WE JUST MADE ONE A HOMELESS
SHELTER! I CAN'T BELIEVE THE COASTAL
COMMISSION WOULD OKAY THIS PROJECT. IT
WOULD DESTROY SIGHT LINES OF THE HILLS
AND NOT ADD ANYTHING TO THE TOWN. THE
ENVIRONMENT WOULD SUFFER AS WELL. HAS
C-77.2 A TRAFFIC IMPACT ASSESSMENT BEEN DONE?
C-77.3 WHAT ABOUT CONTAMINATION OF WETLANDS AND
FARM LAND. THE SOUTHERN ENTRANCE TO

Robert E. Moody, D.M.D.
A Professional Corporation
Family & Cosmetic Dentistry



538 Main Street
Half Moon Bay, CA 94019
650.726.9046
www.DrMoody.com
inquiry@drmoody.com

- C-77.4 MAIN STREET IS HISTORIC WITH THE VIEWS AND SIGHT LINES OF THE HILLS AND THIS PROJECT WOULD DESTROY THIS BEAUTY. THE OVERSIZED HOTEL WOULD BE THE FOCAL POINT OF THE SOUTHEAST ENTRANCE TO HALF MOON BAY AND FOREVER RUIN THE NATURAL BEAUTY OF THE AREA. ALSO
- C-77.5 HAS THERE BEEN ANY STUDIES ON THE NEED FOR ANOTHER HOTEL! DO NOT DESTROY OF WONDERFUL TOWN! THIS
- C-77.6 PROJECT IS NOT NEEDED AND THE DAMAGE TO HISTORIC VIEWS AND NATURE COULD NEVER BE UNDONE.

Sincerely;
Robert E Moody DMD

Response to Commenter Letter C-77: Robert Moody

C-77.1 Please see Topical Response 2, Aesthetics, regarding impacts to visual scenic vistas.

C-77.2 A Traffic Assessment was performed by traffic engineering consultants W-Trans in July 2020 and is Appendix H, Traffic Impact Study, of the Draft EIR.

C-77.3 See Section 4.4 of the Draft EIR for an analysis of impacts to wetlands.

C-77.4 Please see Topical Response 2, Aesthetics, regarding visual quality concerns.

C-77.5 Please see comment response B-1.1 regarding visitor demand.

C-77.6 This is not a comment on the adequacy or content of the environmental analysis in the EIR but is noted and will be provided to decisionmakers through the publication of this Final EIR.

Comment Letter C-78, Beverley Ashcraft

August 26, 2022

Hyatt Place EIR
ATTN: Jill Ekas
City of Half Moon Bay
Community Development Director
501 Main Street
Half Moon Bay, CA 94019

Re Hyatt Place EIR

Dear Ms. Ekas and City of Half Moon Bay:

C-78.1

I am writing this letter in support of the plans for the Hyatt Place Hotel on the south end of Main Street in Half Moon Bay. As a longtime resident and former Main Street business owner, I have seen many changes to our coastside town and believe that adding a new hotel near to the downtown area would be a great asset to the Main Street merchants and community as a whole. In addition to providing additional lodging to visitors of our city, it would also serve to bring more jobs and dollars to the community via tourists staying at the hotel, dining in our restaurants or shopping in town.

The addition of the hotel would also bring new sidewalks and paths to the south end of Main Street, which have been needed for some time. Giving people a safe and attainable area to walk down our historic Main Street.

I believe a great amount of time and research has been put into this project and foresee it adding a great benefit to our community.

Sincerely,


Beverly Ashcraft

Response to Commenter Letter C-78: Beverley Ashcraft

C-78.1 This is not a comment on the adequacy or content of the environmental analysis in the EIR but is noted and will be provided to decisionmakers through the publication of this Final EIR.

Comment Letter C-79, Donna Dexter

September 6, 2022

Hyatt Place EIR
ATTN: Jill Ekas
City of Half Moon Bay
Community Development Director
501 Main Street
Half Moon Bay, CA 94019

Re Hyatt Place EIR

Dear Ms. Ekas and City of Half Moon Bay:

C-79.1

I am writing this letter in support of the plans for the Hyatt Place Hotel on the south end of Main Street in Half Moon Bay. As a longtime resident and former business owner in the city, believe that adding a new hotel near to the downtown area would be a great asset to the Main Street merchants and community as a whole. In addition to providing additional lodging to tourist, it would also serve to bring more jobs and dollars to the community via tourism, dining and shopping in town.

The addition of the hotel would also bring new sidewalks and paths to the south end of Main Street, which have been needed for some time. Giving people a safe and attainable area to walk down Main Street.

They have spent the last 6 years putting a great amount of time and research has been put into this project and foresee it adding a great benefit to our community.

Sincerely,



Donna Dexter

Response to Commenter Letter C-79: Donna Dexter

C-79.1 This is not a comment on the adequacy or content of the environmental analysis in the EIR but is noted and will be provided to decisionmakers through the publication of this Final EIR.

Comment Letter C-80, Susan Morasci

September 6, 2022

Hyatt Place EIR
ATTN: Jill Ekas
City of Half Moon Bay
Community Development Director
501 Main Street
Half Moon Bay, CA 94019

Re Hyatt Place EIR

Dear Ms. Ekas and City of Half Moon Bay:

C-80.1

I am writing this letter in support of the plans for the Hyatt Place Hotel on the south end of Main Street in Half Moon Bay. As a life long resident I believe that adding a new hotel near to the downtown area would be a great asset to the Main Street merchants and community as a whole. In addition to providing additional lodging to tourist, it would also serve to bring more jobs and dollars to the community via tourism, dining and shopping in town.

The addition of the hotel would also bring new sidewalks and paths to the south end of Main Street, which have been needed for some time. Giving people a safe and attainable area to walk down Main Street.

The property owners have spent the last 6 years putting a great amount of time and research has been put into this project and foresee it adding a great benefit to our community.

Sincerely,

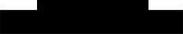

Susan Morasci

Response to Commenter Letter C-80: Susan Morasci

C-80.1 This is not a comment on the adequacy or content of the environmental analysis in the EIR but is noted and will be provided to decisionmakers through the publication of this Final EIR.

Comment Letter C-81, Hazel Joanes

Hazel Joanes



September 13, 2022

Submitted via HyattHotel@hmbcity.com

Jill Ekas
City of Half Moon Bay
Community Development Department
501 Main Street
Half Moon Bay, CA 94019

RE: Hyatt Place Draft Environmental Impact Report
(State Clearinghouse No. 2018032059 City File Number: PDP 072-13)

Dear Jill Ekas:

I reviewed the Draft Environmental Impact Report¹ (DEIR) for the Hyatt Place (Project) and respectfully submit these comments to encourage the City of Half Moon Bay to conduct a more thorough analysis of all the Project’s potential impacts, and identify all feasible mitigation measures to protect the public health and safety. I present my comments in the spirit of improving the analysis of the Project’s environmental impacts so that the City takes the necessary steps to minimize those environmental impacts.

I. ACRONYMS AND DEFINITIONS

C-81.1

The DEIR does not include a list of acronyms, abbreviations, and definitions used in the document. To improve readability, and minimizing confusion in the document, the DEIR should include a master list of acronyms, abbreviations, and definitions.

II. PROJECT COMPONENTS: OPEN SPACE

C-81.2

The DEIR fails to define “open space” as used in the document. The term “open space” is used throughout the document, but it is unclear if it is meant in the same connotation as that which is defined in the City’s Conservation and Open Space Element and the California Government Code.

¹The document is titled “ENVIRONMENTAL IMPACT REPORT HALF MOON BAY HYATT PLACE PROJECT (Volume I)” It should be corrected to denote “DRAFT”.

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III. CONSTRUCTION: HAULING ROUTES

C-81.3

The EIR fails to disclose the locations of the disposal sites that will be used and fails to identify the impacts on traffic circulation along SR1, Hwy 92, Main Street, and other streets within the Town Center area associated with those disposal hauling routes.

Also, the DEIR neglects to address impacts of hauling routes on SamTrans bus schedules during commuting hours on work and school days and on weekends and holidays.

IV. CONSTRUCTION: DRAINAGE

C-81.4

The Project would result in up to 120,000 square feet of impervious area on site, including the multi-use path and emergency vehicle access routes. The Project would direct stormwater runoff from the hotel building and parking lot into treatment areas and allowed to evaporate or percolate into the ground. However, some stormwater would be allowed to flow overland into wetland areas, but the DEIR fails to disclose the volume of stormwater that would flow overland, the location of the wetlands and the environmental and safety effect the overflows would on the wetland areas and SR1.

V. PROJECT OBJECTIVES

C-81.5

The City actively supported the conversion of an existing 52-room hotel located along State Route 1 (SR1) to transitional housing for the permanently unhoused, unsheltered, and transient populations. The DEIR does not disclose any data the City considered in determining that a substitute hotel is needed to replace the former 52-room hotel with a 129-guest room hotel with ancillary buildings. Without adequately analyzing whether a nationally branded hotel such as the Hyatt is the best-suited development for the Half Moon Bay, the City cannot conclude that this Hyatt hotel meets the City's primary objectives. The DEIR fails to disclose the City's decision process and analysis in determining that the hotel meets the City's primary objectives. Did the City conduct a fair, equitable, and objective process to conclude that the Project meets the City's primary objective? How will the City ensure that the hotel will provide access to low-cost accommodations?

The DEIR should disclose any City led evaluations (based on clear objective criteria) confirming that the hotel meets the City's primary objectives. The DEIR at very least, should disclose the facts it considered in determining the need for a hotel, disclose any ratings or scoring of each objective, define and thresholds of what is considered "lower cost" and describe the City's plan of action to ensure that Hyatt brand will in-fact at all times, provide "lower cost" room rates for all room types.

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VI. PROJECT DESCRIPTION: APPROVALS AND ENTITLEMENTS

C-81.6 The DEIR was prepared to cover all the anticipated actions associated with the planning application PDP 072-13 for the proposed hotel facility. The approvals and actions anticipated for the Project include a proposed change in zoning from the current zoning as a planned unit development to commercial general. To accommodate a future zoning change, the City would issue a use permit until the City officially rezones Zoning District. The DEIR concludes that there are no significant impacts to Land Use and Planning however, this finding is based on presumption that the rezoning is predestined, and that the City would not be required to seek public input to issue a use permit or to change the zoning. However, the DEIR does not disclose why the City is not required to engage in a public process to change the Local Coastal Implementation Plan which comprises the City's zoning and subdivision ordinance and zoning map.

The DEIR should clearly disclose why it is necessary to remove the PUD designation and make known the underlying requirements that result in the need for rezoning the parcel to construct the hotel building. The DEIR should also explain any environmental benefits to the community² resulting from the rezoning and disclose any environmental impacts associated with the rezoning of the property.

VII. SETTING, IMPACTS, AND MITIGATION MEASURES

C-81.7 The DEIR should analyze the cumulative and expected impacts of the Project's construction and post-construction operational effects alongside other types of projects that are either approved or are pending approval from the City, Special Districts, Utility Companies, County and State. At the very least, the DEIR should analyze and disclose those foreseeable environmental and health impacts resulting from increased truck traffic, noise, vibrations, air pollutant emissions, and greenhouse gas emissions from the projects that the City has already approved and are anticipated for construction near the Town Center, at local schools, and on the adjacent residential parcels during the same time period the Project will be constructed.

The DEIR lacks clarity on whether the hotel serves the goals of the City's Housing Element and fails to disclose the interaction between the City's General Plan and the hotel. The DEIR fails to reveal if the Project use contributes to the City's Regional Housing Needs Allocation (RHNA). The DEIR should disclose any inconsistencies with the goals of the City's Housing Element and the Project.

² The DEIR should also disclose the specific reasons the City considers this hotel proposal is an economic and environmental beneficial project for City and explain how those benefits more significant than preserving the integrity of the LCLUP.

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C-81.8 In addition to projects scheduled for construction in the unincorporated County, the DEIR should list large residential and private commercial construction projects such as the improvements in Ox Mountain landfill, or State and Federal projects scheduled for construction in the vicinity and disclose the environmental cumulative impacts of those activities and the Project's construction.

VIII. AESTHETICS

C-81.9 The DEIR finds that the Project would have significant and unavoidable cumulative impacts on aesthetic resources, however, the DEIR contains no mitigation measures to reduce these impacts to a level of less than significant. CEQA prohibits agencies from approving projects with significant adverse environmental effects where there are feasible mitigation measures that would lessen or avoid those effects. Where several measures are available to mitigate an impact, each should be discussed and the basis for selecting a particular measure should be identified. The City should develop mitigation in an open public process, and those mitigation measures should be fully enforceable.

IX. VIBRATION AND NOISE

C-81.10 The DEIR does not adequately evaluate vibration impacts or identify reasonable mitigation measures to minimize impacts of vibrations. The DEIR fails to address vibration effects on sensitive receivers resulting from construction activities.

The DEIR should identify and evaluate alternative construction methods that would result in lower vibration and noise. To mitigate vibration impacts on sensitive receivers, at very least, the DEIR should consider locating ingress and egress of construction equipment and heavily loaded trucks away from residential streets, restricting the operation of large earthmoving equipment on the site to as far away as possible from sensitive receivers or changing the sequence of construction operations. In addition, activities that cause elevated levels of vibration could be staggered so that multiple sources of vibration are not occurring at once. The City could also restrict the utilization of vibratory rollers and packers and disallow construction activities on weekends and holidays. If such mitigation measures are not workable, as a mitigation the City might consider offering temporary living accommodations to those persons who have high sensibilities to vibrations.

X. TRANSPORTATION AND TRAFFIC

C-81.11 CEQA requires agencies to support their environmental conclusions with "substantial evidence". The CEQA process expects that the City develop mitigation measures that are fully enforceable and cannot be deferred to a future time. The DEIR does not present substantial evidence to support its conclusion that after mitigation, the Project would have a less than significant environmental impact on transportation and traffic. Specifically, Mitigation Measure TRA-1 does not mitigate significant transportation impacts caused by the Project. Conducting

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surveys at a future date to identify the impacts of a project after the Project is constructed is not an enforceable action that guarantee that noise impacts will be mitigated.

C-81.11
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The DEIR also fails to evaluate the impacts of the Project’s construction and post-construction hotel operational activities on Kelly Ave which is a major access point from SR1 to an elementary, a middle school, a church, the boys and girls club regional gymnasium, a regional soccer field, several restaurants, and a weekly farmer’s market.

The DEIR analysis is insufficient as it does not provide supporting data to validate traffic counts and it does not evaluate peak traffic on Sundays and holidays during the fall pumpkin season or on National and State holidays when there are significant numbers of travelers visiting the coast for leisure and recreation. Also, the DEIR analysis for Saturday peak traffic hours should include sufficient data to support that Saturday peak traffic is between 12 pm to 2 pm.

XI. AIR QUALITY

The DEIR presents data which assumed that the Project would have been built in 2020. It is now 2022, and the Project is yet to be constructed. The Project’s daily construction operational air emissions analysis need to be re-evaluated to reflect for a revised construction date and schedule.

C-81.12

The DEIR presents data using an outdated version of the California Emissions Estimator Model to quantify potential criteria for pollutants and greenhouse gas (GHG). Appendix C- Air Quality & Greenhouse Gas Assessment should be revised to incorporate data using the latest version of CalEEMod.³ Additionally the DEIR should reevaluate the number of construction working days required to complete the Project construction in light of the labor shortages and beleaguered building supply chain caused as a consequence of the COVID-19 pandemic. It is possible that the project would incur a longer period for construction which would likely result in increased air pollutants and greenhouse gas emissions.

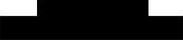
As an additional mitigation measure during the Project’s construction phase, the City could consider the installation of ongoing air monitoring devices to detect levels of pollutants during the construction activities. These monitoring devices could be placed at the Project site and at various strategic locations throughout the adjacent residential areas. If elevated levels of pollutants are detected, the City could identify and implement specific actions to respond and rectify the problem with the Project applicant.

C-81.13

XII. CULTURAL RESOURCES

³ DEIR Appendix C: Attachment 2: CalEEMod Modeling Output and Attachment 3: EMFAC2017 Inputs for Operation
Mobile Emissions are blank sheets.

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C-81.13
Cont.

The DEIR identifies significant environmental impacts on cultural and tribal resources, but the mitigation measures fall short of meaningful solutions. The mitigation measures identified in the DEIR disregarded the consultation process in which both the tribe and the City are to invest time and effort into seeking mutually agreeable resolutions to preserve or mitigate impacts to a cultural place, where feasible. The City failed to implement a thorough process to actively seek information from affected tribes and discuss carefully, mitigation alternatives in a manner that is mindful of all affected tribes' cultural values.⁴ The DEIR is inadequate in its analysis of the impacts on tribal cultural resources as the City failed to vigorously seek knowledge from impacted tribes.

XIII. UTILITIES AND SERVICE SYSTEMS

C-81.14

The DEIR finds that the Project would have no significant impact on utility and services. CEQA requires agencies to support their environmental conclusions with "substantial evidence" however the DEIR provides no substantial data to support its finding. The DEIR is erroneous in finding that there are no impacts on the utilities and service systems. The DEIR uses information received through personal communication with a CCWD staff member. Conclusions about any environmental impacts should rely on factual data received through official documents from the Coastside County Water District (CCWD). On March 5, 2021, the U. S. Department of Agriculture informed Governor Newsom that San Mateo County is considered one of 50 counties designated as primary disaster areas due to drought conditions. On May 11, 2021, the Board of Directors adopted Resolution 2021-02, informing the public of a possible water shortage and requesting voluntary water conservation.⁵ On July 8, 2021, Governor Newsom issued a Proclamation of a State of emergency adding the County of San Mateo, among other counties, to the list of counties in a state of emergency due to drought. On March 24, 2022, the CCWD declared a water shortage emergency because the ordinary demands and requirements of water consumers cannot be satisfied without depleting the water supply of the District to the extent that there would be insufficient water for human consumption, sanitation, and fire protection. The CCWD enacted Ordinance No. 2022-01 to conserve the water supply of the District for the greatest public benefit with particular regard to public health, fire protection, and domestic use, and to conserve water by reducing and restricting nonessential water use that if continued would constitute waste. In addition, the District implemented Stage 2 of the District's Water Shortage Contingency Plan. The DEIR should address any impact of the Project's water requirements on the CCWD water shortage.

⁴ As called for in Assembly Bill (AB) 52 consultation process

⁵ The Coastside Water District (CCWD) implemented Stage 1 – Water Shortage Advisory of its Water Shortage Contingency Plan.

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XIV. ALTERNATIVES ANALYSIS: ALTERNATIVE DEVELOPMENT SCENARIOS

The DEIR is deficient in disclosing a reasonable range of alternatives. Other potentially feasible build alternatives could be analyzed such as:

C-81.15

- A smaller sized hotel with lesser guest rooms, parking spaces, no pool house and limit the buildings to one- or two-story structures.
- A hotel/residential/retail (50-40-10%) combination building to include a one or two-story hotel along with one or two-story housing and retail space on the proposed Project PUD zoned property (excluding the 1.15-acre parcel north of Seymour Street along SR1)

XV. ALTERNATIVES ANALYZED

The DEIR evaluates only 3 alternatives, a no-project alternative, reduced intensity, and multifamily residential and also considers a hypothetical scenario for a future housing subdivision. The DEIR identifies that Alternative 2 would reduce the overall massing of the Project which then would reduce the aesthetic impacts associated with the Project. However, Alternative 2 also includes a future subdivision allowing for future development of up to 16 dwelling units (8 duplexes), potentially with accessory dwelling units, along Seymour Street. The DEIR should not rely on hypothetical scenarios but only consider realistic alternatives and disclose the impacts of the alternatives. The DEIR should provide clarification of the following:

C-81.16

- If the City has predetermined approval of the Project with future housing units and will be amending the General Plan -Housing Element to reflect the housing
- If the future dwelling units would count towards the RHNA
- If accessory dwelling units (ADU) are applicable for multi-family dwellings such as duplexes
- If the City has received a proposal to consider a housing project on the 1.15-acre parcel
- Clear explanation for the reasons a PUD should be rezoned to CG
- If there are existing legal agreements, Memorandum of Understandings, or verbal communications with the property owner, whereby the City is now bound to rezone the Project parcel

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XVI. ENVIRONMENTALLY SUPERIOR ALTERNATIVE

C-81.17

The DEIR concluded that Alternative 2 and Alternative 3 are the environmentally superior alternatives because both would substantially reduce the aesthetic impacts due to the reduced Project massing, increased setbacks, and improved site plan. The DEIR states that Alternative 2 “better” aligns with the City’s and the applicant’s primary project objectives, goals, and policies and finds that Alternative 2 is the environmentally superior alternative. However, the DEIR does not present any objective data in support of the finding or present an objective analysis supporting the City’s assertion that Project meets the City’s primary objectives. To validate the assertion that Alternative 2 meets the City’s objectives, the DEIR should disclose the City’s quantitative criteria and analysis of the Project and City’s priority objectives for each of the Project’s alternative scenarios

The DEIR also lacks evaluation and analysis on the effects of the post-construction operational impacts of each alternative. The DEIR should disclose the impacts resulting from increased disruptions⁶ that would be caused by hotel visitors traveling through adjacent neighborhoods in particular increases in noise, pedestrian and vehicular traffic, street parking, litter, etc.

XVII. 1.15 ACRE PARCEL LOT LINE ADJUSTMENT CONFLATED WITH CEQA PROCESS

C-81.18

The expansion of the Project to include a 1.15-acre parcel⁷ via lot line adjustment should not be approved under the Hotel CEQA process. The approvals of a lot line adjustments, and a hotel project are separate actions that should undergo independent approval processes. The DEIR should clarify if the CEQA process for the hotel construction automatically grants approval for the lot line adjustments and should also explain if construction of the hotel could be accomplished without the lot line adjustment.

The DEIR should also clarify that any proposal to use this 1.15-acre parcel involving construction of housing units that would very likely result in additional environmental impacts and would require a separate CEQA process.

XVIII. CHANGE IN ZONING - AFFECT ON LCLUP

C-81.19

The DEIR fails to disclose the effects the rezoning of 5.02-acre parcel from a PUD to another designation would have on the powers of the LCLUP. The DEIR should disclose whether such rezoning sets precedence for changing zonings of other

⁶ Such disruptions could entail increases in truck traffic from the movement of goods and merchandise in and out of the hotel, increases in air pollutant emissions and greenhouse gas emissions.

⁷ Area used by the auto dealership for extra parking.

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C-81.19
Cont.

parcels that are currently designated PUD's. Consideration of changes zoning for this parcel location should undergo separate City public hearing process and not be merged with this CEQA process.

XIX. CONCLUSION

When implemented well, CEQA builds public trust and encourages sustainable development that will serve the local community for years to come. The CEQA process and the DEIR for this Project provide an opportunity for the City to fully evaluate and disclose all potential impacts and identify meaningful and enforceable protective measures. It is with optimism that I anticipate the City will revise the document to include full disclosure of all environmental impacts, and recirculate⁸ document as for public review and comment.

Sincerely,
Hazel Joanes
Hazel Joanes

⁸ Recirculate the document to as the Draft Environmental Impact Report.

Response to Commenter Letter C-81: Hazel Joanes

C-81.1 A list of acronyms used in the Draft EIR and Final EIR is included in Chapter 3.0, EIR Text Revisions, of the Final EIR.

C-81.2 "Open Space", as used in the Draft EIR, is consistent with the City's LCLUP (LCLUP, p. i-6). The LCLUP defines open space pursuant to Public Resources Code Section 65560(h), which states that "Open-space land" means any parcel or area of land or water that is devoted to an open-space use as defined in this section, and that is designated on a local, regional, or state open-space plan as any of the following:

- (1) Open space for the preservation of natural resources, including, but not limited to, areas required for the preservation of plant and animal life, including habitat for fish and wildlife species; areas required for ecologic and other scientific study purposes; rivers, streams, bays, and estuaries; and coastal beaches, lakeshores, banks of rivers and streams, and watershed lands.
- (2) Open space used for the managed production of resources, including, but not limited to, forest lands, rangeland, agricultural lands, and areas of economic importance for the production of food or fiber; areas required for recharge of groundwater basins; bays, estuaries, marshes, rivers, and streams that are important for the management of commercial fisheries; and areas containing major mineral deposits, including those in short supply.
- (3) Open space for outdoor recreation, including, but not limited to, areas of outstanding scenic, historic, and cultural value; areas particularly suited for park and recreation purposes, including access to lakeshores, beaches, and rivers and streams; and areas that serve as links between major recreation and open-space reservations, including utility easements, banks of rivers and streams, trails, and scenic highway corridors.
- (4) Open space for public health and safety, including, but not limited to, areas that require special management or regulation because of hazardous or special conditions such as earthquake fault zones, unstable soil areas, flood plains, watersheds, areas presenting high fire risks, areas required for the protection of water quality and water reservoirs, and areas required for the protection and enhancement of air quality.
- (5) Open space in support of the mission of military installations that comprises areas adjacent to military installations, military training routes, and underlying restricted airspace that can provide additional buffer zones to military activities and complement the resource values of the military lands.
- (6) Open space for the protection of places, features, and objects described in Sections 5097.9 and 5097.993 of the Public Resources Code."

The LCLUP further defines several categories of open space that may be provided as part of new development, which are listed below. The use of "open space" in the Draft EIR is consistent with the LCLUP's definition of "Open Space, Public", because the open space proposed as part of the project would be accessible to members of the public and would preserve the wetlands along SR-1.

Additional definitions of open space from the LCLUP relevant to various types of development include the following:

- Open Space, Common: Open spaces areas for common use including but not limited to recreational areas and facilities for the use of prospective residents of a development, such as tennis courts, golf courses, swimming pools, playgrounds, or community gardens. Common open space does not include driveways, parking lots, private patios and yards, or other developed areas. LCLUP, p. i-6
- Open Space, Private: Open space areas for the private use of residents of individual units, including but not limited to patios, decks, yards, and land permanently dedicated to open field agricultural use. LCLUP, p. i-7
- Open Space, Public: Open space areas accessible to members of the general public, including but not limited to neighborhood and other public parks and accessory parking lots, beaches, bike paths, hiking or equestrian trails, and vista points. Environmentally sensitive habitat areas, green infrastructure for stormwater management, and archaeological sites may be included in public open space only if such areas are contiguous with or otherwise contribute to the open space area usable by the public for passive recreation, including walking, wildlife viewing. Public open space does not include areas which are unusable for recreational purposes, such as private or public streets, private parking lots, and hazardous areas such as steep slopes and bluff faces. LCLUP, p. i-7

The Half Moon Bay Zoning Code, Chapter 18.02 Definitions, provides the following definitions for open space relevant to various types of development:

- Open Space, Common. “Common open space” means an open space within a residential development that is reserved for the exclusive use of residents of the development and their guests.
- Open Space, Private. “Private open space” means a usable open space adjoining and directly accessible to a dwelling unit, reserved for the exclusive use of residents of the dwelling unit and their guests.
- Open Space, Public. “Public open space” means that portion of a development site that has been dedicated to or otherwise set aside for public access, use or benefit.
- Open Space, Total. “Total open space” means the sum of private and public open space.
- Open Space, Usable. “Usable open space” means outdoor or unenclosed area on the ground, or on a balcony, deck, porch or terrace designed and accessible for outdoor living, recreation, pedestrian access or landscaping, but excluding parking facilities, driveways, utility or service areas, or any required front or corner side yard, and excluding any space with a dimension of less than six feet in any horizontal direction or an area of less than forty-eight square feet.

Please see Chapter 3.0, EIR Text Revisions, of the Final EIR where these definitions have been added to clarify the use of the term “open space” in the EIR.

C-81.3 As described in Chapter 3.0, Project Description of the Draft EIR, the construction haul routes would be mostly confined to SR-1, with Main Street and Poplar being used to access the areas between the project site and SR-1. While Main Street would be used as an intermediate connection between the project site and SR-1, it would not be used as a bypass for SR-1 during hauling operations. As stated on page 3-16 of the Draft EIR, approximately 380 cubic yards of fill material would be imported to the project site to meet the grading needs of the project. It is anticipated that anywhere between 23 to 38 truck trips would be required to import fill material to the project site. Truck hauling would be temporary and expected to occur over a period of 1 - 2 weeks; therefore, there would be an average of two to four trucks each day over the two-week period, or an average of four to eight round trips made by trucks each haul day.

Prior to the start of construction activities, the contractor will prepare and submit a detailed construction management plan for City approval. The construction management plan will indicate the days and times of construction, the duration of the construction activity, where workers will park, truck haul routes, the number and type of trucks that will access the site during each construction activity, and other details. The City will require that adequate access for all transportation modes, especially emergency vehicles, be maintained during construction. Please see Chapter 3.0, EIR Text Revisions, of the Final EIR where this information has been added.

Trucks would be scheduled to make trips only during off-peak hours; this requirement would be specified in the construction traffic management plan. The construction management plan also specifies hours of construction, material storage locations at the site, worker parking locations, and construction duration by construction activity. With implementation of the approved construction traffic management plan, truck hauling would have no impact on public transit operations.

C-81.4 As described in Chapter 4.10, Hydrology and Water Quality, of the Draft EIR, implementation of the Original Project would add 120,000 square feet (2.75 acres) of impervious surfaces where currently no impervious surfaces exist. Project design incorporates several landscape elements that would help contain stormwater in the event of a flood, including self-retaining stormwater treatment areas and bioretention areas on the western side of the project site.

In addition to project design elements, Mitigation Measure BIO-2a (MM BIO-2a) and Mitigation Measure BIO-2b (MM BIO-2b) would be implemented and will reduce potential project impacts on wetlands to less than significant levels. MM BIO-2a would require all jurisdictional wetlands and ESHAs identified in accordance with the California Coastal

Commission to be avoided to the extent feasible. This includes direct loss and indirect water quality impacts that could occur due to adjacent development. MM BIO-2b would compensate for lost wetlands by restoring avoided wetlands at a ratio of 4:1. For the full mitigation measure text, see Section 4.4.4 of the Draft EIR.

Additionally, as discussed in Chapter 4.10, Hydrology and Water Quality, of the Draft EIR, construction activities would require a National Pollutant Discharge Elimination Discharge System (NPDES) Permit, issued by the Regional Water Quality Control Board, which would contain water quality control requirements. NPDES permit compliance during project construction would prevent runoff from the project site from exceeding the capacity of stormwater drainage systems and would ensure that no substantial additional sources of polluted runoff are created. The project design includes a dual treatment system that would receive runoff, preventing the release of polluted stormwater and impacts on stormwater drainage system during project operation.

C-81.5 As stated in Chapter 3.0, Project Description, of the Draft EIR, the Original Project and Modified Alternative 2 would be consistent with the City's project objective of meeting demand for branded and reasonably affordable hotel rooms to support Half Moon Bay's growing local tourist and agribusiness economies. Past studies indicate that there is adequate visitor demand on the coast to support the project. Furthermore, the Chamber of Commerce has also found need for conference facilities which can support mid-week hotel demand which is off-peak from the high weekend demand. The proposed hotel would be mid-range, featuring more amenities than a budget hotel, but would be lower in cost than a luxury hotel.

The project was found to be consistent with LCLUP Policy 5-71, which requires new development of higher cost accommodations and/or new development that would fail to provide lower cost accommodations on land where that use is allowed and suitable to provide lower cost accommodations (See Table 4.13-3 in Draft EIR Section 4.13, Population and Housing). The proposed hotel would offer new accommodations and is not replacing any existing low-cost rooms. The project is providing bicycle rentals and a new trail segment. If the Original Project were to be built, the City would review the project's contribution to public coastal access such as via reduced cost lodging and/or in-lieu fees at the permitting stage to ensure compliance with this policy in coordination with the Coastal Commission guidance and the City's LCLUP Policy 5-71, which is the standard of review for the Coastal Commission with respect to development within the City of Half Moon Bay. Also see Topical Response 5, Modified Alternative 2. Modified Alternative 2 provides a detailed proposal for how Modified Alternative 2 will provide lower-cost visitor accommodations using a combination of lower-cost rooms and no-cost visitor-serving amenities available to the public and in accordance with the requirements of the Half Moon Bay LCLUP.

C-81.6 The project site is zoned Planned Unit Development (PUD), and the LCLUP designation is Commercial – General. However, the LCLUP update indicates that the site is proposed to be rezoned to Commercial – General (CG) as part of the future implementation of the LCLUP.³ The CG zoning standards are used as an appropriate guide for this site because they are consistent with the LCLUP land use designation and can also be accommodated by the PUD zoning. As explained in Section 3.6, Approvals and Entitlements (page 3-18, footnote 3 of the Draft EIR), A Use Permit would be required until the project site is rezoned to CG. Depending on the construction schedule for the project, a Use Permit may not be necessary for the project. Whether or not a Use Permit or rezoning is required, either approval would be part of a public review process. Please see Topical Response 7, LCLUP and Zoning of the Hyatt site, for more information.

C-81.7 As discussed in Section 4.0, Setting, Impacts, and Mitigation Measures, of the Draft EIR, CEQA requires an evaluation of a project's contribution to cumulative environmental impacts. For this Draft EIR, the past, present, and probable future projects within the region that could result in related or cumulative environmental impacts, including projects outside the control of the lead agency, were considered in the cumulative impacts analysis. Past, present, and probable future development projects along the San Mateo County Midcoast between the Tom Lantos Tunnel to the north, the Half Moon Bay southern city limits to the south, and the Half Moon Bay city limits to the east are listed in Table 4.0-1 of the Draft EIR. This list incorporates relevant, reasonably foreseeable projects that, when combined with the project, could contribute to cumulative impacts.

With regard to the City's Housing Element, Section 4.13, Population and Housing, states that Association of Bay Area Governments (ABAG) prepared the Regional Housing Needs Allocation (RHNA) for the previous cycle 5 2015-2022 period, which identified the need for a total of 240 units for varying income groups by the end of 2022. The City has completed its first draft cycle 6 Housing Element for the 2023-2031 period and submitted it to the California Department of Housing and Community Development (HCD) for review. The cycle 6 Housing Element must identify adequate sites for a RHNA of 480 units distributed amongst various income categories. The 1.15-acre site on the north side of Seymour Street is identified as a pipeline project in the draft cycle 6 Housing Element because it is part of an active application. The residential portion of Modified Alternative 2 project would be consistent with the ABAG Regional Housing Needs Determination.

³ City of Half Moon Bay Local Coastal Land Use Plan, pages 2-25 and A-7.

For the analysis of cumulative impacts on truck traffic, noise, vibration, air pollution and greenhouse gas emissions, see the respective chapters in the Draft EIR (4.15, 4.12, 4.3 and 4.8). Topical Response 6, Cumulative Impacts, provides further discussion in response to comments regarding cumulative impacts associated with traffic and aesthetics.

C-81.8 According to Section 15355 of the CEQA Guidelines, cumulative impacts are defined as “two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts.” As stated in the CEQA Guidelines, an individual project may not have significant impacts; however, in combination with other related projects, these cumulative effects may be considerable. Cumulative impacts are considered by each environmental parameter and both public and private projects are considered both in terms of timing and location.

For the purposes of this project, the analysis of cumulative impacts is based on the list of past, present, and probable future development projects in Table 4.0-1 of the Draft EIR which are along the San Mateo County Midcoast between the Tom Lantos Tunnel to the north, the Half Moon Bay southern city limits to the south, and the Half Moon Bay city limits to the east. The spatial boundary for the study of a project’s cumulative impacts varies depending on the resource of concern. For example, impacts related to geology and archaeological resources are generally site specific, while air quality, greenhouse gas, and noise impacts can encompass larger areas. Most of the project’s impacts are limited in terms of geography, and would not compound impacts from past, existing, or future projects beyond the project area. For additional information on the cumulative project selection process, see Chapter 4.0, Setting, Impacts, and Mitigation Measures, of the Draft EIR.

C-81.9 Please see Topical Response 2, Aesthetics, regarding visual impacts. As described in Section 4.1, Aesthetics, of this Draft EIR, three impacts associated with aesthetic resources were found to be significant and unavoidable for the Original Project.

The mass and scale of the project would obstruct views of the protected ridgeline from SR-1 that would result in significant and unavoidable impacts. The project has incorporated screening techniques and other design considerations in an effort to minimize aesthetic impacts. However, the visual quality of the project site as seen from public viewpoints is conservatively considered to be adversely affected by the project. The findings above are based on special circumstances related to both the site, including its location, shape, visibility, and gateway location; and the proposed development, including its relatively long facades and larger building forms than typically found in the city.

While screening techniques could be included in the project, they would not address interruption of long-range public views and changes in the visual quality of the site and

surrounding areas from the permanent change associated with this scale of development. Therefore, impacts AES-1, AES-2, and AES-3 were determined to be significant and unavoidable. Additional mitigation measures were explored, but no feasible measures were identified that would further reduce the of the Original Project. The impacts of Modified Alternative 2 are described in Topical Responses 2 and 5.

C-81.10 As stated in Section 4.12, Noise and Vibration, of the Draft EIR, noise-sensitive receptors within the project vicinity are limited to the nearby residences located east of the project site across Main Street and north of Seymour Street, and the nearby theater located to the east of the project site, opposite Main Street. The buildings or structures that are occupied or used by noise-sensitive receptors are considered sensitive structures. The highest maximum noise levels generated by project construction would typically range from about 80 to 90 dBA L_{max} at a distance of 50 feet from the noise source. The temporary construction noise impact would be considered significant if project construction activities exceeded 60 dBA L_{eq} at nearby residences or exceeded 70 dBA L_{eq} at nearby commercial land uses and exceeded the ambient noise environment by 5 dBA L_{eq} or more for a period longer than one year.

Construction activities, such as drilling, the use of jackhammers, rock drills and other high-power or vibratory tools, and rolling stock equipment (tracked vehicles, compactors etc.) may generate substantial vibration in the immediate vicinity. Vibration levels would vary depending on soil conditions, construction methods, and equipment used. Because landscaping would not be expected to require heavy equipment, all distances were measured from the edge of the parking lot on the project site to the surrounding buildings.

The nearest residences and the theater, which are both east of Main Street, would be 85 to 95 feet from the nearest heavy construction activity. These sensitive structures would be exposed to vibration levels at or below 0.06 in/sec peak particle velocity (PPV). The fire station, which would not be considered a sensitive land use, would be more than 165 feet from the nearest heavy construction activity and would be exposed to vibration levels at or below 0.03 in/sec PPV. According to Table 4.12-3, of the Draft EIR, 0.3 in/sec PPV is the threshold at which there is a risk of damage to older residential dwellings. Therefore, there would be no significant vibration impact due to project construction on sensitive structures. Additionally, there are no activities expected during project operation that would result in significant groundborne noise or groundborne vibration levels; therefore, there would be no operational impact with respect to groundborne noise or vibration.

Project construction is projected to last for approximately 566 working days. The “worst-case” construction noise level is considered the hourly average noise levels for each construction activity, assuming every piece of equipment would operate simultaneously. Table 4.12-6 in the Draft EIR shows that hourly average noise levels during construction

would temporarily exceed 60 dBA Leq at residential land uses and 70 dBA Leq at commercial land uses and would exceed ambient noise levels by 5 dBA Leq or more. Temporary construction activities would be conducted in accordance with the provisions of the Half Moon Bay's Municipal Code, which limits temporary construction work to between 7:00 a.m. and 6:00 p.m. on weekdays, between 8:00 a.m. and 6:00 p.m. on Saturdays, and between 10:00 a.m. and 6:00 p.m. on Sundays and holidays. The construction crew is required to adhere to construction best management practices to reduce temporary construction noise levels emanating from the site and minimize disruption and annoyance at existing noise-sensitive receptors in the project vicinity. The project proponent would also implement the construction best management practices in Mitigation Measure NOI-1a, which includes measure addressing increased noise levels at sensitive receptors, such as using dampening blankets, and locating stationary noise-generating equipment, such as air compressors or portable power generators, as far as possible from sensitive receptors as feasible. For a comprehensive list of applicable measures include in Mitigation Measure NOI-2, see Section 4.2, Noise and Vibration of the Draft EIR.

Implementation of Mitigation Measure NOI-1a, described above, would reduce construction noise levels emanating from the project site, thereby minimizing disruption and annoyance. With the implementation of these controls, as well as the Municipal Code limits about allowable construction hours, and considering that construction is temporary, the impact would be reduced to a less-than-significant level.

C-81.11 The Traffic Demand Management Plan (TDM) program measures required by Mitigation Measure TRA-1 in Section 4.15, Transportation and Traffic, of the Draft EIR, would reduce the volume of project-related vehicle travel by providing or encouraging transportation options for hotel guests and employees. The TDM program measures, as described in Appendix H, Traffic Impact Study, of the Draft EIR, requires that the TDM program be monitored for effectiveness and adjusted as necessary. Mitigation Measure TRA-1, requires that the TDM program measures are to be monitored, and a monitoring report provided to the City Manager and Traffic Engineer annually to ensure the effectiveness of the program. If the TDM program measures are ineffective, it shall be adjusted as needed to mitigate project-generated vehicle miles traveled (VMT).

Implementation of the TDM measures monitoring program, which consists of annual mode split and VMT surveys is required by TRA-1, and is therefore enforceable by the City.

The study intersections and roadways were chosen by the City Engineer in agreement with the project's consulting transportation engineers (W-Trans) based on the facilities that are most likely to be potentially impacted by the project. Kelly Avenue was not included in the study because the project is not anticipated to increase trips along this street.

As described in Appendix H, Traffic Impact Study, of the Draft EIR, standard professional practice for traffic studies should reflect typical conditions experienced by most users on most days.⁴ Therefore, conducting a study during unusual conditions (such as during inclement weather, holidays, or large events) should be avoided because it is not representative of typical conditions.

A review of available Saturday traffic counts from the Performance Measurement System (PeMS) website managed by Caltrans confirmed that the time of day with the highest number of observed vehicles along SR-1 occurred between 12:00 p.m. and 2:00 p.m.

All traffic counts used in this study were compared to other available data sources in terms of consistency and peaking characteristics, and found to be similar, thereby validating their use in the Draft EIR.

In reference to the comment on future noise surveys, the commenter is referred to Mitigation Measure NOI-1a (Construction Best Management Practices), which requires that the project implement construction best management practices, such as installation of noise barriers, types of engines used for construction, no idling, utilization of “quiet” air compressors, and location of construction staging areas established at the greatest distance between construction-related noise sources and noise-sensitive receptors nearest to the project site. On-site checks during construction would be employed to ensure that nuisance noise is being reduced in accordance with the noise control plan. This is enforceable through the MMRP, which includes a description of implementation and timing, monitoring responsibility, and verification of implementation. As explained in Impact NOI-1, the implementation of Mitigation Measure NOI-1a would reduce construction noise levels emanating from the project site, minimizing disruption and annoyance. With the implementation of these controls, as well as the Municipal Code limits on allowable construction hours, and considering that construction is temporary, noise impacts of project operation would be less than significant with mitigation.

C-81.12 For the purposes of this EIR, construction of the Original Project was estimated to begin in 2023 and last 15 months, with an estimated 566 construction workdays. Although the Draft EIR assumes project construction would begin in 2023, a change in this assumption would not affect the analysis or the validity of the Draft EIR, because construction period and operational emissions would be the same, if not reduced, due to the increased efficiency of construction and operational equipment.

The CEQA Thresholds of Significance for Climate Impacts for BAAQMD was adopted on April 20, 2022. For the purposes of this analysis The California Emissions Estimator Model (CalEEMod) Version 2016.3.2 was used to estimate emissions from construction

⁴ W-Trans, 2020. *Traffic Impact Study for the Hyatt Place Hotel*.

and operation of the site assuming full build-out of the project. The project land use types and size, and anticipated construction schedule were input to CalEEMod. An addendum to the Air Quality and Greenhouse Gas Assessment was completed in December 2021 for Reduced Intensity, Alternative 2 and Alternative 3.⁵ The addendum letter analyzed the emissions for Reduced Intensity, Alternative 2 and Alternative 3 using CalEEMod model, version 2020.4.0. Since the models that were used in the previous study were superseded with a newer version, the emissions for the project were updated. The addendum explains that the updated modeling shows lower air quality and GHG emissions with the project when compared to the 2020 modeling due to CalEEMod incorporation of newer motor vehicle emission rates reflective of the State's Emission FACTors (EMFAC2017) model and updated building energy consumption rates.

As discussed in Chapter 4.3, Air Quality, of the Draft EIR, the project would require the implementation of Standard Condition AQ-1, which would include measures to control dust and exhaust during construction as required by BAAQMD, and Mitigation Measure AQ-1, which would require selection of equipment during construction to minimize emissions. With implementation of standard conditions and mitigation measures, air quality impacts were found to be less than significant for the Original Project as well as Modified Alternative 2. As a result, no additional mitigation measures are required under CEQA.

C-81.13 The Native American Heritage Commission was contacted in July 2017 concerning the preparation of an EIR for the project. Of the five tribes contacted, three responses were received from the Coastanona Rumsen Carmel Tribe, the Amah Mutsun Tribal Band of Mission San Juan Bautista, and The Ohlone Indian Tribe. Representatives from the Coastanona Rumsen Carmel Tribe, the Amah Mutsun Tribal Band of Mission San Juan Bautista requested that a Native American monitor to be present during groundbreaking activities, which is required by Mitigation Measure CUL-1. Mitigation Measure CUL-1 would be implemented to protect sensitive archaeological resources and human remains. For further information regarding Native American Consultation, see Draft EIR Appendix E, Cultural Studies Memorandum.

C-81.14 The analysis in Section 4.16, Utilities and Service Systems, is supported by information from the agencies and other sources listed on page 4.16-1 of the Draft EIR. Upon review of the project description, Coastside County Water District determined that implementation of the project would not require the relocation or construction of new or expanded water facilities to supply the project site with potable water. The Draft EIR

⁵ Illingworth & Rodkin, Inc., 2021. Addendum to Hyatt Hotel Air Quality & Greenhouse Gas Assessment, December 23, 2021.

concludes that project operation would consume 4.8 million gallons annually, assuming the median rate of water use for hotels. Project water demand would result in approximately a 1 percent increase in total District demand and would not require the construction of new or expanded water facilities. For further discussion regarding water supply impacts, please see Topical Response 3, Water and Hydrology.

C-81.15 In addition to the No Project alternative (Alternative 1), in Subsections 5.5.1 through 5.5.3 the Draft EIR also analyzed a Reduced Density alternative (Alternative 2), which has since been modified (see Topical Response 5, Modified Alternative 2), and a Multi-Family Residential alternative (Alternative 3). CEQA Guidelines Section 15126.6(c) requires that an EIR identify any alternatives that were considered by the Lead Agency but rejected as infeasible. The EIR must briefly explain the reasons underlying the Lead Agency's determination to reject an alternative. The following factors may be used to eliminate alternatives from further consideration: (i) failure to meet most of the basic project objectives, (ii) infeasibility, and (iii) inability to avoid significant environmental impacts. Please see Section 5.4, Alternatives Considered but Rejected for Further Analysis, and Section 5.4.1, Alternative Site Locations, of the Draft EIR, for information regarding alternatives considered but rejected for further analysis, and alternative project site locations that were considered but rejected for further consideration.

C-81.16 See comment responses C-81.6 and C-81.19 regarding planned residential development and project zoning.

C-81.17 Following circulation of the Draft EIR, the applicant submitted revised plans to the City indicating that Alternative 2 (with revisions), is now the Proposed Project that would be considered for approval. This Proposed Project is described in the Final EIR as Modified Alternative 2. Modified Alternative 2 has been determined to be the environmentally superior alternative as explained below. The Project Objectives, which are listed in Section 3.3 of Draft EIR Chapter 3.0, Project Description, were also listed in Subsection 5.2 of Chapter 5.0, Alternatives, of the Draft EIR as revised by the EIR Text Revisions in Final EIR Appendix 3.0-A, Attachment to EIR Text Revisions. A discussion of the ability of each of the alternatives as well as the project to meet project objectives is provided on page 5-24 of the Final EIR as revised by the EIR Text Revisions in Final EIR Chapter 3.0. This discussion concludes that both Modified Alternative 2 and Alternative 3 are environmentally superior to the project, and that Modified Alternative 2 is also environmentally superior to Alternative 3 due to its proposed approach to subdividing the 1.15-acre parcel north of Seymour Street. Modified Alternative 2 also better aligns with the City's and applicant's primary project objectives. Modified Alternative 2 is the environmentally superior alternative. Please see Topical Response 5,

Modified Alternative 2, and text revisions in Appendix 3.0-A, Attachment to EIR Text Revisions of the Final EIR.

C-81.18 As discussed in Appendix 3.0-A, Attachment to EIR Text Revisions, of the Final EIR, the text revisions to for Modified Alternative 2 proposes a lot line adjustment on the 5.02-acre hotel parcel, reducing it and adding 0.45 acres to the auto dealership parcel. This additional area for the dealership allows for reuse of the 1.15-acre parcel on the north side of Seymour Street (currently used by the dealership and owned by the project applicant) for future residential development of up to 16 units. A four-lot parcel map would allow for future residential development of up to 4 units on each parcel. The 1.15-acre parcel is designated as residential – medium density in the LCLUP, and the site is zoned for residential development in the R-2 (Two family Residential) Zoning District. The existing use of the 1.15-acre parcel, as overflow parking for the dealership, conflicts with the parcel's land use and zoning. However, residential development under Modified Alternative 2, following approval of a parcel map to create four lots, would be consistent with the parcel's land use designation and zoning.

Discussion of environmental impacts associated with the 1.15-acre parcel is provided in the Environmental Impacts subsection of Draft EIR Section 5.5.2, Reduced Intensity, Alternative 2. Modified Alternative 2 proposes subdivision into four lots instead of eight lots as proposed in Alternative 2, but the total development potential of up to 16 units across 1.15 acres remains the same.

C-81.19 As described in comment response C-81.6, the project site is zoned Planned Unit Development (PUD)/Commercial, and the LCLUP designation is Commercial – General. However, the LCLUP update indicates that the site is proposed to be rezoned to Commercial – General (CG) as part of the future implementation of the LCLUP. Until the Zoning District is officially rezoned to CG, the project would require a Use Permit, which is listed in the approvals and entitlements discussion in Draft EIR Section 3.6. Depending on the construction schedule for the project, a Use Permit may not be necessary for the project.

Rezoning is not proposed as part of the project but will be changed through implementation of the LCLUP.

Please see Topical Response 7, LCLUP and Zoning of the Hyatt site, regarding zoning and land use.

Comment Letter C-82, Chad Pometta

September 13, 2022

Attention: Jill Ekas

Re: Hyatt Place, Half Moon Bay

Dear Jill,

C-82.1

I am here to state that I am in favor of the proposed Hyatt Place Hotel in Half Moon Bay. I have been following the project for some time. I always look forward to visiting Half Moon Bay and I really like the fact that this location will be downtown with easy access to restaurants and shopping.

Sincerely,



Chad Pometta

Response to Commenter Letter C-82: Chad Pometta

C-82.1 This is not a comment on the adequacy or content of the environmental analysis in the EIR but is noted and will be provided to decisionmakers through the publication of this Final EIR.

Comment Letter: C-83, David Schorr

COMMENTS ON
DRAFT ENVIRONMENTAL IMPACT REPORT
HALF MOON BAY
HYATT PLACE PROJECT (Volume I)
State Clearinghouse No. 2018032059
City File Number: PDP 072-13

Submitted by David Schorr, Half Moon Bay homeowner, taxpayer and resident

September 13, 2022

SUMMARY:

This Draft EIR does not meet the standards of adequacy for the following reasons:

- C-83.1 • Failure to subject Alternative 2 (102 rooms plus housing development) to the standard of evaluation applied to the Project (129 rooms). It has been known since early 2021 that Alternative 2 is the preferred alternative of the Applicant, and with this in mind, Alternative 2 design should have been the focus of the Draft EIR.
- C-83.2 • Uses arbitrary determinations to declare Less Than Significant (LTS) impacts of Alternative 2 in Table 5-2 with respect to Regulatory Setting requirements related to “causes a substantial adverse effect on a scenic Vista”, “substantially damages scenic resources... within a State scenic Highway”, “creates a new source of substantial light or glare which would adversely affect day or nighttime views in the area”.
- C-83.3 • Uses inappropriate baseline to determine LTS impact of Alternative 2 with respect to policy 9.2 and others.
- C-83.4 • Incorrect and arbitrary findings of consistency with Relevant General Plan Policies as noted in table 4.1-1, with respect to policies 9-2, 9-6, 9-23, 9-30, 9-31.
- C-83.5 • Omission of evaluation and/or improper application of evaluation of Project and Alternatives with respect to Regulatory Setting:
 - City Code 14.37.035
 - City Code 18.37.010
 - City Code 18.37.020
 - City Code 18.37.030
 - City Code 18.37.035
 - LAND USE PLAN CHAPTER 9, sections 9-1, 9-2, 9-3, 9-5, 9=6, 9-12, 9-23, 9-30
- C-83.6 • Arbitrarily and inappropriately discounts, and fails to consider visual impact to motorists (both driver and passenger) transiting northbound and southbound State Highway 1, a designated protected view corridor, especially from due west of the Project, as well as on approaches to the Project from both north and south, as is required by Coastal Commission guidance.
- C-83.7 • Draft is arbitrary and inconsistent with previous Coastal Commission language and guidance regarding extent and nature of blockage versus preservation of protected visual resources; i.e. inland hills/upland slopes.
- C-83.8 • Inaccurately describes Alternative 2 as “Reduced Intensity” project, as the Draft EIR fails to include the footprint, square footage, and visual and other resource impacts of the townhome development component of Alternative 2, specifically under the Aesthetics comparisons.

- C-83.9 • Alternative 2 was considered without an adequately or completely described project, including the components of housing proposed to the north of the existing car dealership. As Alternative 2 has been known to be preferred by the Applicant for well over a year, this is inappropriate, and inadequate.
- C-83.10 • Fails to include assessment of impacts from the townhome housing component of the project under Alternative 2 upon protected visual resources; therefore Aesthetics assessment is incomplete and inadequate
- C-83.11 • Uses inappropriately chosen time periods to assess traffic circulation impacts; selecting noon to 2 PM on weekends rather than the evening 4 PM to 6 PM, or 5 PM to 7 PM timeframe, during which weekend tourist exodus routinely occurs.
- C-83.12 • Aspect ratios of figures 4.1-3 and 4.1-4 are flattened and distorted, providing an inaccurate depiction of existing site conditions, minimizing the true visual impression of the currently unimpeded view of the hills in the distance.
- C-83.13 • Even given the inadequacy of precision and nuance in the many designations throughout this Draft of “Less Than Significant” (LTS) impacts in many areas, it must be reasonably considered that these combinations of LTS impacts are indeed cumulatively Significant.

Considering all of the above, detailed further in this document, Planning Commission must declare this Draft inadequate, and cannot certify this Draft EIR or subsequent Final EIR.

Planning Commission must not issue a finding of “overriding concern” to approve either the Project, or Alternative 2, or Alternative 3, with unmitigated Significant impacts as well as many Less Than Significant impacts, as no such legitimate issue of overriding concern exists regarding this Project.

Planning Commission must declare this Draft inadequate, and not approve Project or any of the Alternatives as proposed by the Applicant; instead offering the Applicant the opportunity to return with a project whose massing does not violate City Code with respect to protected visual resources, and other concerns as voiced in these comments and by other members of the public. Many additional project options for this parcel can be imagined, with lower height being a primary goal and consideration to maintain consistency with City Code and Policies.

ATTACHMENTS:

APPENDIX A: Compiled public comments from NextDoor discussion groups, to be entered into the public record on this matter

APPENDIX B: Response to specific public comments made at Study Session August 9, 2023

APPENDIX C: Coastal Commission Substantial Issue Determination Document, hearing date August 11, 2016 regarding fire tower appeal

APPENDIX D: Additional photos of existing site conditions with story poles installed, and commentary, to support written comments in this document

NARRATIVE, SETTING OF THESE COMMENTS:

- To take a step back from the details of the EIR these comments, I would ask the Planning Commissioners and Staff to consider the inherent limitations of the CEQA process. This is a legalistic and technical process, which frequently misses the mark in applying common sense and objective evaluation of the impacts of a project, and other reasonably foreseeable projects, in a cumulative fashion.
- C-83.15 Much focus is given to discussing impacts deemed “Significant and Unavoidable”, which is appropriate. However, it seems that if an EIR can decrease the impact in any area to the category of “Less Than Significant” (LTS), the perception is that the impact is no longer important – important being a term not legally defined in the lexicon of CEQA, but relevant. However, and this is one of the challenges with CEQA analysis, it is not adequately appreciated that LTS does not mean no impact. There is frequently, and in this case in our fair city, a plainly evident cumulatively significant impact from the additive effects of any number of LTS impacts. This is most prominently noted in traffic and circulation – if each of the dozens or hundreds of individual development projects over the past several decades had LTS impacts which were individually ignored in evaluation because they were deemed to be small (a non-CEQA term), then how did we get the situation of rush hour and weekend gridlock? One could apply similar plain sense reasoning to preservation of visual resources – individually, one small intrusion upon the viewshed of the inland hills can be glossed over, but the additive effect of continuing development, shaving away at the viewshed, is cumulatively significant. On a more existential level, every additional project, development, human activity which creates greenhouse gas emissions is part of a cumulatively significant impact, which we are now seeing the effects of in climate and weather patterns, sea level rise, and coastal erosion, prominent quite locally. This is the kind of cumulative impact that the EIR process is supposed to address, but rarely does, and it fails in this Draft as well.
- C-83.16
- C-83.17 To address one of the primary goals of public policy in Half Moon Bay, to “preserve the small town charm and character”, one must step back and consider the bigger picture, when making final decisions as a Planning Commission.
- C-83.18 Another high level point to be made is that the Applicant does have the right to develop his property, but only so long as that development conforms with all aspects of City Code and Policies, as is mentioned in the Draft EIR. It does not matter if it is a hotel, a homeless shelter, market rate housing, low income housing, a strip mall, or a lead smelter. If it is of the height that we see for this proposed Project, at approximately 34 feet, and somewhere between 450 and 470 feet long, and unambiguously and unequivocally blocking views of protected visual resources, this project, and any project on this parcel cannot go forward with that massing. Project size, no matter the nature of the project, must be reduced in order to conform and be consistent with City Code and Policies. A finding of “Less Than Significant” does not mean that there is not noticeable, measurable, objective, and impactful changes that will occur should the project be built at the proposed size of Alternative 2. The applicant has a multitude of possibilities for developing this parcel without becoming inconsistent with the cited city code and policies. Unfortunately, neither the project nor its Alternatives 2 or 3 are consistent with relevant governing sections of City Code and LUP, and as such, neither can be approved.
- Following, these comments will address specific points of Draft EIR, noting page and section number. One of the challenges in commenting on this Draft EIR is the brevity with which Alternative 2 was considered, and recommended, and the cursory and arbitrary manner in which its impact on visual resources was reduced to the LTS category. Of necessity, to address this problem, comments on specific

C-83.18
Cont.

sections of the draft may refer to the Project (129 rooms), as well as describing relevance to the Applicant preferred Alternative 2 (102 rooms plus housing development).

I would also like to direct your attention to the appendices to these comments.

Appendix A is a compilation of comments made publicly on the local NextDoor group, through August 22, 2022. As comments made in that forum are not part of the official record for this Project, I introduce them here to become part of the official record. As you will note, comments made on that message board are in the vast majority in opposition to this Project and the Alternatives. Whether or not those public comments speak specifically to sections of city code, or the adequacy of the draft EIR, the overall sentiment is quite clear.

Appendix B consists of rebuttals to verbal public comments made at the August 9, 2022 Planning Commission Study Session for this Project. Whether pro or con, people who take the time and effort to comment publicly to Planning Commission are making their comments primarily for the purpose of influencing the decision-making process. Differences of opinion are to be expected, and in fact welcomed, in an open process. However, when project supporters make statements which are unsupported, biased, or outright false, that must be called out, to correct the record, and to avoid skewing the debate, discussion, and ultimately decisions, unfairly.

Appendix C is a copy of the Coastal Commission Substantial Issue Determination Document, hearing date August 11, 2016, regarding the fire tower appeal. Issues raised in language used in this document is referenced in my comments.

Appendix D is a series of photographs taken August 23, 2022 of the subject parcel, from a variety of viewpoints and angles, showing existing site conditions, existing available and visible protected viewshed, and illustrating prohibited visual impacts of the proposed Project described as Alternative 2, as represented by the story poles and flagging currently installed. At any point in my comment document where I refer to disputes or disagreements about extent of lack of consistency with existing code and guidelines as it may relate to baseline conditions of existing view shown, or impacts of the project upon that viewshed, please refer to these photos. They are not specifically referenced through the text of my comments, but they are highly relevant. Please consider these photos and commentary the part of the official record of these comments on the draft Draft EIR.

DRAFT EIR COMMENTS:

- Unless otherwise specified, all comments following are to be considered declarations of inadequacy, insufficiency, or incorrectness within the Draft EIR.
- C-83.18 Cont. All public comments that I have made both verbally and in writing before Planning Commission, Architectural Advisory Committee, and City Council are to be incorporated by reference and considered part of the official record as response to this Draft EIR, from 2016 through present.
- At the outset of these comments, I feel compelled to correct terminology which has been used inappropriately at various times by Staff, Planning Commission members, and members of the public commenting on this project.
- C-83.19 The thrust of the comments and objections to this Project (that term meaning in this context the 129 room Project as well as the Alternative 2 of 102 rooms plus housing development component) focus on Aesthetics, and protection of Visual Resources, with a secondary focus on Traffic/Circulation.
- This correction of use of terminology is extremely important in properly evaluating the impact of the Project upon visual resources: In verbal Planning Commission discussions, as well as many separate locations within this Draft, we frequently hear the term “ridgeline”, and discussion of whether or not the Project obscures views of, or protrudes into the ridgeline or to what extent. In fact, in the entire Chapter 2 of the Coastal Commission certified LCLUP, the word “ridgeline” does not appear. The terminology used, and therefore appropriate for evaluation of impacts upon visual resources are upland slopes and hillsides. I would urge the Commissioners, Staff, and EIR consultants to be cognizant of this significant and important distinction in continued consideration of this Project. The visual resources which are an inherent and intrinsic part of the charm, appeal, and allure of HMB are protected by code and statute as upland slopes and hillsides as viewed from various vantage points, not only views of the ridgeline itself.
- C-83.20 Another glaring and important misuse of terminology shot through the Draft EIR, and coloring conclusions throughout, is in the misuse and inappropriate application of the term “Reduced Intensity” to describe Alternative 2. In Section 5 of the Draft EIR, Aesthetics, the Alternative 2 impacts are claimed to be reduced from SU to LTS, though the Draft EIR completely omits in this consideration any evaluation of the housing component of Alternative 2. Whether looking at square footage, visual impacts, height, massing, energy use, trip generation, etc., in all cases when the 102 room hotel block is considered along with the 16 townhomes, the impacts/numbers/parameters are nearly identical to that of the Proposed Project at 129 hotel rooms, so to call Alternative 2 “Reduced Intensity” is inconsistent, incorrect, arbitrary, and inappropriate. This by itself should disqualify the Draft EIR from consideration as adequate, even before considering the many other flaws delineated in these comments. The characterization of Alternative 2 as “Reduced Intensity” appears to be deliberately misleading, and biased.
- All page number references are to the page of the pdf of the Draft EIR as published by the City.
- Section 1.2, page 14:**
- C-83.21 “The level of analysis contained in this EIR will be sufficient to proceed with project implementation without further environmental review.”

- C-83.21 | This statement is plainly incorrect, please see summary statement for these comments and further references following. Further environmental review is indeed required to correct deficiencies of inappropriate and inaccurate findings of less than significant (LTS) impact upon visual resources specifically.
- Section 2.2**
2.2.2 SIGNIFICANT IMPACTS, page 23:
- C-83.22 | I am in disagreement with the EIR consultants as to their statement that significant impacts will be LTS with mitigation measures applied.
- Also, as the Applicant has expressed that Alternative 2 is his preferred alternative at this point in time, it is logically challenging to comment upon Table 2-1 which described impacts of the 129 room design, as that is not the direction this project is going. However, relevant for discussion later in these comments, it is noted that the 129 room Project as described has impacts determined to be Significant and Unavoidable (SU) even after mitigation measures are applied – AES-1, AES-2,, AES-3. My contention is that the decision to declare impacts of Alternative 2 as LTS for these areas are arbitrary, and unsupported, and therefore cannot be considered as valid.
- C-83.23 | It may be a typo or formatting error, however it is unclear what the first line of the **Table 2-1 visible on page 2-11** refers to – environmental impact of cumulative/significant, with no feasible mitigation measure proposed. Please clarify.
- C-83.24 | I disagree with the Draft conclusion on AES-4, light and glare, specifically regarding nighttime views. Draft claims reduction to LTS with mitigation, but the discussion on this point is incomplete and inadequate, and both for Project and Alternative 2, failing to consider in narrative analysis the change to baseline conditions and resultant light and glare coming from hotel rooms. In the context of this discussion, the exterior lighting and landscape lighting is largely irrelevant, it is the significant change from the undeveloped baseline condition of this parcel to a wall of hotel rooms shining out towards Rt 1 that is Significant and Unavoidable. As discussion of this point is most relevant to Alternative 2, this will be further discussed in comments elsewhere. The Draft EIR is thus inadequate on this point.
- Section 2.2.3 SIGNIFICANT UNAVOIDABLE IMPACTS, page 24, page 2-6**
- C-83.25 | This section of the Draft finds Significant and Unavoidable Impacts from the project at the 129 room design phase. However, since this design option has been largely discarded by the Applicant, and supplanted by Alternative 2, the Significant Unavoidable impacts listed here must be considered as to whether or not they are still relevant and applicable to Alternative 2. Although best discussed as comments to Section 5, it must be acknowledged that the Draft did find these Significant and Unavoidable impacts, and due process and consideration must be given if those impacts are to be downgraded to LTS under Alternative 2. That has not happened in this Draft.
- Section 2.2.4 ALTERNATIVES TO THE PROJECT, pages 2-7 through 2-9, pages25-27 pdf.**
- C-83.26 | Alternative 2, the reduced density alternative is discussed here. We start to see signs of bias from the EIR consultants in this section, as the narrative describes a two-story building and a three-story building in the hotel blocks. What they glaringly fail to mention is that the two-story building is the same height as the three-story building. For purposes of impact upon visual resources, it matters not how many

C-83.26
Cont. stories/floors there are, but the overall massing and height above existing grade of the proposed structures. This bias must be identified, and called out wherever it occurs. Describing a two-story building and a three-story building is meant to imply in narrative text that one building is significantly lower in height than the other. That is not the case here. The Draft is also inadequate here as previously noted that the project Alternative 2 is not fully delineated, with no plans available including elevations for the proposed 16 townhome units, with possibility of additional 8 ADUs. Development on the parcel to the north of the car dealership is subject to the same visual resource code and policy constraints as the hotel buildings themselves, and failing to delineate and evaluate these aspects of the proposed Alternative 2 renders the Draft inadequate and incomplete. A project cannot be evaluated without a fully developed plan.

C-83.27 Alternative 3 is also discussed in this section, consisting of 58 multifamily housing units. The Draft states “the footprint of the primary buildings would be substantially similar to Alternative 2”. Figures available in presentation in the Draft and from Staff indicate that the overall height of these buildings would be substantially identical to the hotel complex buildings in Alternative 2, and therefore having the same impermissible impact on protected visual resources. From a non-CEQA standpoint, if one is considering the social value of a given development project, were the Applicant to propose true and dedicated low income housing of low rise format for this site, not blocking views of the hills, I suspect there would be substantially less community objection to the project going forward. As it stands, from verbal statements by the Applicant in the June 2021 Study Session, it is not at all clear to what extent 4 units of the proposed 16 housing units would satisfy Low Income and Very Low Income categories – in June 2021, the Applicant hedged, and seemed to suggest that he would consider anything below market-rate to satisfy the conditions of “affordable”. However, failing to provide housing for the most needy in our community leaves this project not providing any social value.

Table 2-1 – IMPACTS

Page 2-23, page 41 pdf

C-83.28 Energy: ENG-1: “The project would result in a conflict of the local plan for renewable energy and energy efficiency.” Finding of Significant before mitigation, mitigation measure of operations with green electricity only purported to reduce impact to LTS. This narrowly construed finding ignores both the GHG emissions of visitors traveling to and from the hotel, as well as additional trips out from their lodging for other activities, emissions from employee and supplier vehicle traffic, as well as GHG emissions from additional growth inducing impacts of this hotel project. It is specious to claim that this project will not have growth inducing impacts, as the specific and explicit purpose of building a new hotel is to attract new business and activity to the area. The Draft is therefore inaccurate and inadequate in this regard, using this plain bias to allow for consideration of the Project. And as has been noted previously, LTS does not mean “no impact” – and especially where climate change and greenhouse gases are concerned, the cumulative impact of many small changes is real, and dire.

C-83.29 Traffic mitigation measures are discussed in Appendix H of the Draft, but as noted in those sections, the language used there is “should”. Many of the measures presented are aspirational and theoretical in nature, presuming that people will voluntarily abandon their vehicles and walk or take bicycles. Measures such as airport shuttles are described, not made mandatory. All of the mitigation measures combined are presumed to reduce traffic impacts by approximately 15%, according to Appendix H. But without enforcement mechanisms, this is a meaningless assumption, and cannot be factored into any

- C-83.29
Cont. | reduction from Significant to LTS. Even if we assume a full 15% reduction, are we then supposed to blindly accept that a 15% reduction in traffic impact changes the impact from Significant to Less Than Significant? That is a specious and arbitrary conclusion in the Draft which cannot be supported.
- Section 3.5** page 3-18, page 64 pdf
- C-83.30 | Draft states “It is not the purpose of any EIR to recommend approval or denial of a project.” That is the strict letter of the law, however, levels of bias are quite apparent in the Draft, especially when one looks at the cursory treatment of Alternative 2, and the arbitrary downgrading of Significant and Unavoidable findings to Less Than Significant levels when comparing project 129 rooms to project 102 rooms. To be discussed in more detail later.
- Page 4-2, page 66 pdf**
- C-83.31 | Draft states “Unless otherwise stated, the environmental setting constitutes the **baseline physical conditions** by which this EIR determines whether an impact is significant.” This text will be referred to later, where the Draft inappropriately uses incorrect baseline conditions, or assumption of baseline conditions.
- Cumulative Impacts:**
Pages 4-4 through 4-9, pages 68-73 pdf
- C-83.32 | This is a section where the Draft unfortunately parts company sharply from reality. This may be an artefact of the CEQA process, but ultimately the decision making by the Planning Commission needs to be rooted in reality. These pages of the Draft EIR list pending, approved, contemplated, and completed projects up and down the Coastside. The Draft overall, however, is inadequate in failing to acknowledge the real world consequences of these developments upon housing prices (non-CEQA), housing shortage (non-CEQA), GHG production (a CEQA concern) and traffic (a CEQA concern), which are well-known and plainly obvious to anyone living here. This list and analysis also fails to take into account information more recently presented by Staff to Planning Commission at a scheduled meeting, regarding the housing overlay, and significant additional development required to meet regional housing goals. As part of this, there are over 450 additional housing units which must be built, including the contemplated large development on the currently vacant Podesta parcel. These additional cumulative impacts appear not to have been factored into this Draft, which renders it inadequate and insufficient.
- Page 69:** Draft states “Most of the project’s impacts are limited in terms of geography, and would not compound impacts from past, existing, or future projects beyond the project area. In these circumstances, CEQA directs that it is not necessary to address in detail the impacts from other projects”. I disagree with the statement “would not compound impacts from past, existing, or future projects beyond the project area” – this is the textbook definition of cumulative impacts, which the EIR and CEQA is supposed to address. I suggest that the Planning Commission take a look at this common sense interpretation of the situation, in its totality, and find that project impacts are indeed cumulatively significant when taken in consideration with other development up and down the coast. The Applicant should be offered the opportunity to come back with a smaller project of lower impact, to provide him the opportunity to develop his property without so much harm.
- The Draft also cites two passages in CEQA as justification for avoiding discussion of certain cumulative impacts:

- C-83.32
Cont. “[w]here a lead agency is examining a project with an incremental effect that is not ‘cumulatively considerable,’ a lead agency need not consider that effect significant, but shall briefly describe its basis for **concluding that the incremental effect is not cumulatively considerable**” (CEQA Guidelines Section 15130 (a)); and
 “[a]n EIR should not discuss impacts which do not result in part from the project evaluated in the EIR” (CEQA Guidelines Section 15130 (a)(1).
 The authors of the Draft EIR appear to be willfully ignoring plaintext interpretation of these two passages – given the aforementioned problems documented as existing in the region regarding traffic, and a well-documented climate change/GHG problem, it is obvious that the incremental effect of this project is indeed cumulatively considerable. Likewise in the second paragraph, stating that the EIR should not discuss impacts which did not result in part from the project evaluated – impacts at issue here do indeed result from the project being evaluated in the EIR. Thus, the Draft EIR is further deficient and inadequate with respect to these passages.
- SECTION 4.1 AESTHETICS**
- C-83.33 This section is at the heart of the objections to the Draft EIR, where it is found to be inadequate on many accounts. Because of the complex structure of the Draft EIR, comments following may relate specifically to the text of Section 4, but also incorporate references to Regulatory Setting issues, trying to avoid overlap and redundancy while being thorough and complete.
 Careful, thorough and straightforward consideration of regulatory setting is crucial for impartial and proper evaluation of the proposed Project, and for Alternative 2. That is because, taken in total, the clear intent and thrust of the many separate sections of the Half Moon Bay Local Coastal Land Use Plan (LUP), and the City Code sections which are implementation of that LUP, is to prioritize protection of visual resources as they are an intrinsic and important aspect of Half Moon Bay. It is important to recognize that the LUP is a very large and complex document, created with a great deal of thought and effort, and it has been certified by the California Coastal Commission. It is therefore a very clear roadmap for implementation of development standards. Simple, plain text reading of many sections of the LUP and City Code demonstrate where Alternative 2 is inconsistent with the text of both of those documents. Although the body of the Draft EIR focuses on the 129 room project version, it will be necessary to apply the same standards of analysis to Alternative 2, as that has been identified as the preferred alternative by the Applicant. The degree to which these City documents spell out restrictions applying to development on this parcel, with language such as “shall” and “will”, rather than “may” or “should” leave no ambiguity as to the purpose and intent of these documents with respect to preservation of protected visual resources. The clarity of these documents as it applies to this potential development also constrains the extent to which Planning Commission could plausibly bend or extend the regulations to allow development at the height and width proposed. I seek to demonstrate that approval of the project as proposed in Alternative 2 is plainly inconsistent with existing regulatory documents and framework.
- C-83.34 As you read through this section of comments, please bear in mind the distinction brought forward earlier in these comments, that the regulatory setting requires protection of the views of upland hills and slopes, not exclusively ridgeline contours.
- C-83.35 As you read through this section of comments, please bear in mind the distinction brought forward earlier in these comments, that the regulatory setting requires protection of the views of upland hills and slopes, not exclusively ridgeline contours.

C-83.35 | City Municipal Code 18.37.020 establishes that the subject parcel is subject to visual resource protection standards.
Cont.

Study Area Visual Setting

Beginning on page 4.1-5, page 79 of the pdf we arrive at some of the most contentious, and problematic aspects of the Draft EIR. The evaluation of impact on visual resources depends on the viewpoints chosen for analysis, and in this section, we see some significant cherrypicking, and narrow focus, which ends up being (unjustifiably) supportive of declaring visual impact of Alternative 2 to be LTS. Bias favoring the Applicant and the project can reasonably be inferred from the viewpoints chosen, as well as from the viewpoints not chosen. The Draft EIR is therefore inaccurate and lacking adequacy as result of inappropriate and incomplete visual impact analysis.

Viewpoint 1, from Main Street towards use across the currently vacant parcel, is not protected by code or policy, and it is appreciated that the consultants added this, and the impact upon it from the project as a result of community concern.

Viewpoint 2, looking north from the intersection of Main Street; the narrative here states “the eastern hillsides make for a notable visual backdrop”. That statement should be noted.

Viewpoint 3, similar to 2, but approximately 150 feet further north.

C-83.36

Figure 4.1-3 representing Viewpoint 2 and Figure 4.1-4 representing Viewpoint 3 are further problematic in that close examination reveals that the aspect ratio of both of these photographs has been distorted, significantly stretching the horizontal relative to the vertical. This can be confirmed by looking at landmarks such as vehicles, pavement markings and road signs, which rather than having their true to life symmetrical format, appear distorted. Whether this is intentional or a formatting error, I cannot know, but the net effect, especially for both of these important baseline reference points is to make the northern upland slopes (protected visual resources) appear much lower and less prominent than they do to the naked eye of a human in the same location. It must be noted that it is very difficult to convey the extent and sweep of a landscape view in a photograph a few inches square.

Viewpoint 4, shown in figure 4.1-4 on page 4.1-10 (PDF page 84) is also problematic. Without visual markers, it is not possible to determine if the aspect ratio of this photograph has been altered, but it does not seem to represent what the naked eye sees from that location, regarding the prominence of the hillside background. As well, it is noted that this view, from the Patridge Trail to the west of the highway is not a protected view, but was included as a result of community input.

It was therefore confusing to opponents of this project as to why views of the project, either direct on from the highway, or oblique views approaching from the north or south on the highway were not included as visual study areas. The answer to that came in the form of verbal comments from the EIR consultants and City Staff during the August 9 study session. Although Highway 1 is designated as a point of reference for protected visual resources, the driver and passenger experience of people transiting that Highway was excluded from the impact analysis, except for the carefully chosen Viewpoints 2 and 3, which show far from the full visual impact of this large project.

There are several additional problems with this approach:

First, the experience of seeing the hillside backdrop to Half Moon Bay, whether traveling north or south on the highway through this area is not a series of discrete snapshots. It is a fairly lengthy stretch of highway (which seems even longer when sitting in traffic) during which there is plenty of time for slight rotation of the head to the left or right to focus the view on the surroundings, and appreciate the beauty currently visible. It was the contention of staff and consultants at the August 9 meeting, that drivers on the highway will be looking straight ahead only, and the Draft EIR, in Section 5 on Alternatives, describes views of the project from a car as “fleeting” (this will be further discussed later in these comments). That was the reason given for not including driver/passenger viewpoint from the highway, more closely adjacent to the 450-foot-long structure of the proposed project. For one thing, this problematically discounts the experience of any passengers, who are free to look in any direction they choose. Secondly, it’s not realistic – it takes very slight movements of the head and neck of a driver to be able to see the open fields to the west, and the currently visible background hillsides to the east. These slightly off axis, oblique views are acknowledged by the angle of approach for Viewpoints 2 and 3, so to completely discount the experience of drivers and passengers on the highway at roughly the same location as Viewpoint 4 on the Patridge trail is quite disingenuous, and thoroughly dodges the visual impact – consider that probably 98% of the daily traffic in the study area is on the highway, not on the Trail. So, while the visual simulations from Viewpoint 4 are illustrative of the head on impact of the project development, the far greater proportion of visitor and resident impression, and loss of viewshed will be experienced on the highway, and should have been depicted and evaluated, rather than deliberately omitted from the Draft.

C-83.36
Cont.

I respectfully submit that views from the highway analogous to the location shown in Viewpoint 4, which will be closer to the subject property, will show even greater impact during the length of travel along the highway, both northbound and southbound. Omitting this quite obvious impact from the Draft EIR is an area in which it is deficient and inadequate.

In summary, on this point, the Draft EIR is grossly deficient, in cherry-picking viewpoints, lacking adequacy. While traveling north, at pretty much any point to the north of Viewpoint 3, the visual impact of the project is much more pronounced. Analysis also fails to consider loss of viewshed while traveling south on the highway, with currently prominent slightly oblique views towards the hills south of town. It seems obvious, but apparently needs to be stated, that the closer one is to the project, the greater the impact in obscuring protected visual resources in the background. It is therefore baffling as to why these much more obvious and impactful viewpoints were not chosen for analysis, as well as the exclusion of the experience of drivers and passengers on the highway as they transit past the project site.

At this point, we must come back again to the inaccuracy in terminology as it relates to the regulatory setting. LUP and Code consistently refer to protected resources of upland slopes and hillsides. The ridgelines are somewhat incidental to that. However, the context of having seen the Study Session gives us the opportunity to understand the thought process and process by which Viewpoints were chosen, and analyzed, and more. While the following are not comments on the specific text of the Draft EIR, they are therefore quite relevant as they tell us how and why that document was created, the thought processes in play. At numerous points in the video of the Study Session, reference was consistently made by staff, Commissioners and consultants to the impact of the project on the views of ridgelines. As noted previously, and as will be detailed below under discussion of regulatory setting, this is inappropriate, and the visual impacts must be considered on the mass of the hillsides and upland slopes,

C-83.36
Cont. not just the ridgelines. This informs us as to the reasons for the lack of adequacy of the Draft EIR. Examples of this are at timestamp 20:45, various points following 41:00 from Circle Point's presentation, 1:04:06 (referring to obstruction of ridgelines views, while ignoring impact the upland slopes below the ridge line), 1:22:31 (comment from a Commissioner referring again to ridgeline rather than hillside), again at 1:30:00, multiple other points prior to 2:44:00 (references to ridgeline as opposed to hillside).

When one considers the impact of the massing of this project on the protected views of the hillsides and slopes rather than just the ridgelines, it necessarily changes the conclusions that are rendered.

REGULATORY SETTING:

The following sections of Code and LUP must be considered and responded to with respect to this project. On the following sections, it will be noted where they were not covered in the Draft EIR, and it will also be noted where there is disagreement with the conclusions as to consistency with Code, as noted in Table 4.1. In all examples below, bold and underline formatting were used to emphasize the importance and relevance of the text of the selected passages.

City Code:

Chapter 14.37
ARCHITECTURAL, LANDSCAPE AND SITE PLAN REVIEW

14.37.035 Design approval criteria

G. The proposed development **shall** be **compatible** in terms of height, bulk and design with other structures and environment in the immediate area.

J. The design **shall** promote **harmonious transition** in scale and character in areas located **between different designated land uses**.

C-83.37 *Comment: the language here of shall is unambiguous. Regarding subsection G, in the study session, Commissioner Gossett did ask for data on height of other buildings in the area. However, it should be obvious at this point that at roughly 34 feet of height across the span of more than 450 feet for this project, it literally dwarfs everything else in the area, thereby failing the test of compatibility in subsection G specifically with respect to height and bulk, which are objective measures and less subject to dispute or interpretation than "design".*

C-83.38 *Comment: subsection J requires harmonious transition between different designated land uses in the area of this project. The project fails here as well, as to the south of the firehouse we have open farmland, and directly across the highway we have protected open space. It is only to the east of the project site that we have consistent development, of lower height, which is set further back from the highway than the Project, thereby having less visual impact, currently obscuring only the lower portion of the background hillsides. Change from that baseline condition to that of a 34 foot tall, 450 foot long structure cannot be described as anything except Significant and Unavoidable (referring to Alternative 2).*

The Draft EIR is inadequate in properly assessing both of these impacts.

Chapter 18.37 VISUAL RESOURCE PROTECTION STANDARDS

18.37.010 Purpose and intent.

The **specific purpose and intent** of these visual resource protection standards are to:

- A. **Protect the scenic and visual qualities of coastal areas as a resource of public importance.**
- B. **Ensure that new development is located so as to protect views to and along the ocean and scenic coastal areas.**
- C. Minimize the alteration of natural land forms.
- D. Restore and enhance visual quality in visually degraded areas.
- E. **Allow development only when it is visually compatible with the character of the surrounding areas. (1996 zoning code (part)).**

Comment: taken separately and as a part of the entire section of Code, 18.37.010 is very clear as to the care with which Planning Commission must evaluate proposed projects, and provides very clear guidelines for development activities which are permissible or impermissible on parcels such as this. Subsection B here requires protection of scenic coastal areas, of which the hillsides and upland slopes are part. Subsection E allows for some degree of poetic license, but when viewed in the context of all the other portions of Code and LUP, I don't believe it gives Planning Commission wiggle room to declare this very large structure to be compatible with the character of surrounding areas.

C-83.39

18.37.020 Visual resources areas

- B. Upland Slopes. **Scenic hillsides which are visible from Highway One** and Highway 92, as indicated on the visual resources overlay map. These areas occur include hillside areas above the one hundred sixty foot elevation contour line...

Comment: delineates this parcel as subject to visual resource protection standards

18.37.030 Scenic corridor standards.

- B. **Development within the Highway One corridor** and scenic corridors along all designated shoreline access routes as indicated on the visual resources overlay map where existing permits or development does not exist. In general, **structures shall be:**

1. Situated and designed to **protect any views** of the ocean and **scenic coastal areas**.
4. **Set back an appropriate distance from the Highway One right-of way** and from scenic beach access routes **in accordance with the intent of this chapter**.
5. Designed to maintain a low height above natural grade, **unless a greater height would not obstruct public views**.

*Comment: Please note the highlighted and underlined areas, which read as "protect **any** views of scenic coastal areas" when parsed – a quite unambiguous statement. The Draft EIR fails to adequately consider the obvious and impermissible impacts of Alternative 2 with respect to this section of Code. Clause 4 and clause 5 are also sections where the Project and Alternative 2 fail in consistency with Code. The reference in clause 4 to "intent of this chapter" speaks to the overarching concerns of preservation of visual resources. All other clauses are subservient to the overriding and overarching intent of the scenic corridor standards. Project as well as Alternative 2 fail in all these regards.*

C-83.39
Cont.

Therefore, by applying the clear and unambiguous language and intent of Section 18.37.030, we must conclude and observe that LTS findings delineated in Table 5-2 (page 480 PDF) are incorrect and arbitrary in nature, specifically the following sentence of that table, under:

Causes a substantial adverse effect on a scenic vista: Alternative 2 and Alternative 3 both are inconsistent with this criteria, and their impacts are properly described as Significant and Unavoidable.

Substantial damages scenic resources... within a State scenic highway: Alternative 2 and Alternative 3 both are inconsistent with this criteria, and their impacts are properly described as Significant and Unavoidable.

Creates a new source of substantial light or glare, which would adversely affect day or nighttime views in the area: Alternative 2 and Alternative 3 both are inconsistent with this criteria, and their impacts are properly described as Significant and Unavoidable.

Moreover, in acknowledging the SU impacts of Alternatives 2 and 3 with respect to “Substantially degrades the existing visual quality of the site and its surroundings” in this Draft EIR, if this true, it is inconsistent, incorrect and arbitrary, and without basis to declare the other sections above to be at the LTS level.

C-83.40

18.37.035 Upland slopes standards.
New development shall meet the following criteria:
C. Structures **shall** be sited so as **to not intrude or project above the ridge line skyline as seen from Highways One and 92.**

Comment: this is clear and unambiguous language, prominently written into city code, to protect visual resources. It is impermissible to cherry pick locations from along Highway 1 to find views where the ridgeline of the proposed buildings barely skirt the ridgeline of the hills, and avoiding the obvious impact and protrusion into hillside ridgelines which occur along hundreds and hundreds of feet of travel along Highway 1. The language of this section does not give Planning Commission latitude to ignore these impacts. The Draft EIR is deficient in failing to properly consider this section of city code. Significant and prolonged protrusion into and above the hillside ridgeline is present in both the Proposed Project as well as Alternative 2 constituting Significant and Unavoidable impacts.

C-83.41

LAND USE PLAN CHAPTER 9:

Comment: The LCLUP has been certified by the California Coastal Commission and must be considered a roadmap in evaluation of any project. Prior to looking at individual policies which may or may not have been evaluated in the Draft EIR, here are extracts from the opening pages of Chapter 9, which emphasize yet again the primacy of protecting visual resources in Half Moon Bay:

9. Scenic and Visual Resources

Ref Sec 30253

In addition to its policies, the findings and declarations made by the State legislature in establishing

- C-83.41
Cont.
- the Coastal Act state that “**the permanent protection of the state's natural and scenic resources is a paramount concern** to present and future residents of the state and nation.” Furthermore, the **Coastal Act prioritizes protection of views from public places** such as trails, parks, vistas, rights-of way, and areas with public access easements.
- The visual character of Half Moon Bay is defined by ... and **its small-scale downtown** Highway 1 Highway 1 is the primary north-south transportation route through the Planning Area. As a result, **a large share of the visual impression of the city is experienced from this corridor.**
- Comment: these LCLUP passages emphasize the lack of adequacy of the Draft EIR, in that the Draft EIR specifically and explicitly and purposely excluded visual impressions from obvious lengths of “this corridor”, which is Highway 1. The LUP, as local implementation of the Coastal Act, is telling us that the views available to drivers and passengers on the highway as they move through this section of town must be considered, and are in fact of primary importance. The Draft EIR skips over this fact, inappropriately. The consultants may attempt to respond here that “we did consider it and decided that the views from Highway 1 were fleeting and inconsequential”, but that’s not going to wash with the Coastal Commission. If views from Highway 1 are fleeting and inconsequential, why were Viewpoints 2 and 3 chosen from Highway 1? Plain reading of the text of regulations requires evaluation that is most impactful to the greatest number of people, and that would be the views as experienced by motorists approaching and transiting this site from both north and south – this was deliberately not done in this Draft EIR; thus the Draft is biased and inadequate on this important point.*
- C-83.42
- Positive visual attributes:
Views of hillsides and ridgelines of coastal mountains
- Sweeping views of the ocean, upland slopes, open spaces, and agricultural areas that make Half Moon Bay so distinctive and picturesque can all be seen from different segments of Highway 1.
- Upland Slopes. As seen from the majority of the Planning Area, the **upland slopes to the east create a scenic backdrop that contributes greatly to the overall visual quality.**
- Scenic corridor policies **require protection of significant views** available along Highways 1 and 92,
- Comment: the LUP here reemphasizes yet again the importance to the community of the view of hillsides as well as ridgelines, and states unequivocally that protection of these significant views is required when considering any potential development. It is specious and illogical, as well as disingenuous to suggest that the 34 foot tall, 450 foot long mass of the proposed hotel could possibly be consistent with these policies.*
- C-83.43
- The LUP retains long-standing policies to keep development below the 160-foot contour line on hillsides, and **requires lower-scale building heights along major roads, view corridors, and other public viewing areas to maintain the quality of broad views of the ocean and upland slopes**
- Comment: this is unequivocal language which limits the permissible height to which development can occur on the subject parcel. Note that this refers specifically to upland slopes, and broad views of the upland slopes. This means from vantage points all along the highway, not just snapshots here and there. The user/viewer experience of transiting north or south on the highway involves and encompasses broad sweeping vistas which will be significantly impacted by the proposed development as Alternative 2,*

C-83.43 | *irrevocably. This is clearly impermissible, and this impact has not been adequately delineated or called out by Draft EIR.*

Following are the specific Policies delineated in Chapter 9. These shall be cross-referenced with Table 4.1-1, page 4.1-17 (PDF page 91), to highlight areas that the Draft EIR inappropriately omitted from analysis, as well as disputing findings of consistency with Land Use Policy as delineated in that table:

C-83.44 | 9-1. Scenic and Visual Resource Areas. **Identify and protect scenic and visual resource areas** in Half Moon Bay, **including but not limited to the scenic corridors**, natural resource areas, and built environment resources as defined in this chapter and designated on Figure 9-1.

Comment: this is not a point of dispute, but merely once again delineates the subject parcel as being under the purview of visual resource protections

9-2. Scenic Resource Protection. New development shall be sited and designed to protect views to and along the ocean, to minimize the alteration of natural land form, **to be visually compatible with the character of its setting**, and, where feasible, to restore and enhance visual quality in visually degraded areas.

C-83.45 | *Comment: the Draft finds the project to be Consistent with this LUP Policy, citing lack of alteration of natural landforms, and because the project does not block views towards the ocean. The problem comes in when one looks at the independent clause of 9-2 stating “to be visually compatible with the character of its setting”, which is part of Policy independent of ocean views. The Draft states that due to incorporating specific colors and materials in the design, it is compatible “because the site is located near open fields to the south and west, and foothills can be seen to the east”. There are several problems with this passage. First, acknowledging open fields to the south and west suggests that a smooth and harmonious transition to the more developed downtown to the north must occur – that is not possible when one is placing the largest building ever built in downtown at this interface of undeveloped land and developed land. A smooth and harmonious transition as is acknowledged as being required cannot be accomplished with a building 34 feet tall and over 450 feet long. The second problem with this faulty analysis is equally vexing – the finding of Consistency states “foothills can be seen to the east” – this view constitutes baseline findings of existing conditions.. If this project is built as proposed, those foothills which are currently visible to the east of the project (in other words, as viewed from the west) will no longer be visible, which is clearly impermissible on careful and logical reading of these passages. The Draft is deficient in this regard, as findings of Consistency with 9-2 are incorrect.*

9-3 Visual Quality. **Preserve and enhance the unique visual quality that contributes to Half Moon Bay’s coastal and small-town character, including its open, expansive views from the coastal terrace to the beaches, bluffs, ocean, and upland slopes.**

C-83.46 | *Comment: this Policy was not considered in table 4.1-1, the plain reading of it demonstrates that this is an omission of significance. Not only does a project this bulk and massing run afoul of small-town character, by its location it impinges upon the open, expansive views... to the upland slopes. Whether by design or error, omission of analysis of 9-3 is a deficiency of Draft EIR. Plain reading tells us that neither Project nor Alternative 2 or 3 is not consistent with 9-3.*

C-83.47 | Policies – Development Standards
9-6. Site Planning and Design for New Development. Require new development to be subject

to design review to **ensure it is sited and designed to protect public views of scenic and visual resource areas** and to be **visually compatible with the character of the surrounding area**.

Measures to be considered may include, but are not limited to the following:

- a. Siting development in the least visible portion of the site;
- b. Breaking up the mass of new structures;
- c. Designing structures to blend into the surrounding natural landscape;
- d. Restricting building maximum size and height;
- e. Clustering or distributing development;
- f. Incorporating landscape elements and screening; and
- g. Conformance with any adopted design guidelines.

Comment: This is a challenging section to comment on, as there is context not clearly visible within the Draft EIR, which is however quite relevant. The Draft finds the project (project at 129 rooms, or Alternative 2 at 102 rooms) as described to be Consistent with this Policy. I respectfully disagree on many fronts.

First, the subsections a through g are mitigation measures to be considered, which can be employed, but which are all in service of, and subservient to the primary clause of 9-6: "ensure it is sited and designed to protect public views of scenic and visual resource areas". In this, even if every measure a through g is applied, but the project as presented is still unable to protect public views of scenic and visual resource areas, then the mitigation measures have failed, and the project cannot be declared to be Consistent with 9-6, and the Project/Alternative creates Significant and Unavoidable impacts. That is precisely the case here.

C-83.47
Cont.

However, the Draft has declared Consistency. I will attempt to understand and explain how this has come about, at least in part. Primarily, I believe it is a function of the fact that this project has gone through many iterations over the past six years. As Planning Director Ekas noted just after 1:01:45 in the August 9 Study Session, "over the course of this design development.....many of these things were at least tried to be done"... Likely unintentionally, staff having viewed many iterations of this project over time, it being moved back to accommodate wetlands, decreased from the original 148 rooms to the current 102 rooms, etc., and sees that mitigation measures a through g have in fact been applied to this project to one extent or another. This represents an internalized, unintentional and unacknowledged shifting of baseline conditions – the baseline conditions here are in fact an empty field with the bulk of the background upland hills and slopes clearly visible, unobstructed above the tree line on Main Street. However, with the passage of time, and continuous involvement with the Applicant, the current presentations of the project, especially Alternative 2 are being seen as an improvement upon the original proposal, and it was granted consistency with 9-6, almost as if the baseline conditions shifted, to be the original 148 room project, rather than the empty parcel that is there now. But, as noted above, although measures a through g have been applied at least to some extent, but the project as presented still unambiguously fails the primary purpose of 9-6, that of protecting views of the inland hills, the finding of Consistency is incorrect, and must be challenged and changed.

To the specific text of the findings of Consistency, yes, the project is set back as far as possible from Highway 1, but it still unambiguously impinges on protected visual resources to the east, as well as to the north and south depending on viewpoint. Therefore this mitigation measures fails to reduce impact. The fact that there are and will remain some unimpeded sightlines across the southern section of the site (note, this acknowledges that motorists transiting Highway 1 are indeed afforded the opportunity of

C-83.47
Cont.

turning their heads to appreciate the views of the inland hills, which is inconsistent with statements and basis of determinations in other portions of Draft) does not change the unambiguous impingement on protected visual resources across more than 450 feet of the site. More will also be said later about the attempts to break up the massing of the project, but whether you put a 16 or 32 foot gap between the two buildings, both buildings are still 34 feet tall. And in fact, if you increase the breezeway gap, the overall length of the project goes from 452 feet up to 468 feet, actually worsening the visual impact regarding length. Additionally, it must be noted that while the Applicant has made great import of a gap between the two large buildings, that gap is only visible when viewed from directly in front of that gap, whether it is 16 or 32 feet. From any other oblique angle of view, (again implicitly acknowledging importance of views to motorists transiting the site along Highway 1) the two buildings will still present as a single long façade, out of character and proportion with any other building in downtown, much less the immediate area. In the context of all these glaring and literally unmissable visual impacts, discussion of siding choice and colors are of much less consequence in the context of the large mass of the project.

Policies - Scenic Corridors 9-12. Town Boulevard Scenic Corridor. **Require** that new development in close proximity to or easily visible from the Town Boulevard scenic corridor, including Highways 1 and 92: a. **Protects views of visual resource areas** as seen from the Town Boulevard, including views to the ocean, **upland slopes (i.e. minimizes intrusions into the ridgeline)**, and the historic Johnston House;

Update the IP (*Implementation Plan?*) with additional standards for new development along the Town Boulevard based on additional study of the scenic corridor. Assessment should, at a minimum, consider views of visual resource areas from the perspective of existing and potential development along the Town Boulevard and identify scenic segments along Highway 1 and 92, **including views of the ridgelines and other visual resource areas**. Development standards should address, at a minimum, appropriate building heights and setbacks....

C-83.48

Comment: proposed project is in close proximity to the Town Boulevard (Highway 1), and is easily visible from same, is thus subject to Policy 9-12. The requirement (i.e., not optional) of 9-12 is that the development protect views of visual resource areas including the upland slopes. Interestingly, this is one of the only places in Code and LUP that actually calls out the word "ridgeline", but the language also includes consideration and required protection for the views of the inland hills and upland slopes as well as the ridgeline itself. Policy 9-12 was not considered in the Draft EIR, and this is a significant omission and deficiency.

It seems to me that 9-12 may be partially aspirational, in that development standards may not have yet been developed regarding appropriate building heights and setbacks within parcels such as this, subject to protection of visual resources. That being the case, each project will have to be evaluated on its own, case by case, in the spirit of all of the foregoing sections of Code and LUP, until such time as height and setbacks standards to protect visual resources are adopted. There is currently a blanket 36 foot height limitation on commercial development in this area, but that should not be taken as an uncontested maximum build height permitted for any given project, in a vacuum of any other regulations or restrictions – specifically for this proposal, because of the location and the prominent background of protected hillside views to the north, east, and south, development to full height of the commercial zone is not possible. When we have conflicting sections of code and regulations such as we do here, the practice is to take the more conservative approach, thereby limiting the maximum development type to avoid infringing upon protected visual resources.

C-83.49

9-23. Upland Slopes and Ridgelines. **Protect broad views of upland slopes, prominent ridgelines and other intervening ridgelines as viewed from scenic corridors** and the beach and shoreline through the following means:

Comment: the preceding is the main premise and purpose of 9-23; subsections a through c below are the means by which those goals shall be accomplished. The language of this first paragraph of 9-23 is unambiguous and unequivocal as to its purpose, and it is acknowledged that both the 129 room project and Alternative 2 would fail these tests (page 5-25, pdf page 465). On page 4.1-18, analyzing the 129 room project, the Draft does find the project to be Inconsistent with 9-23, but the analysis is incomplete. It states "views of ridgelines are impacted as viewed from northbound SR-one approaching the project site from the south". This is another example of repeated failure of rigorous analysis and application of terminology properly and consistently. Not only are views of the ridgelines protected, but views of the bulk of the hillsides and upland slopes are also protected visual resources and must be called out as such with respect to 9-23 and other sections. Additionally, we here again see the effect of cherry-picking viewpoints – improperly and quite illogically, the conclusions here on this page 4.1-18 mentioned only one direction of approach towards the project. A roughly equal number vehicles travel southbound on Highway 1, and all vehicles, whether traveling northbound or southbound have to transit directly in front of this very large structure, which unequivocally blocks long stretches of views of the protected hillsides in the background. The language here, and the omission of clear and well-defined, and objective impacts appears to reflect bias on the part of the authors of the EIR, and is impermissible.

a. Prohibiting new development above the 160-foot contour line and on slopes greater than 30 percent, including grading and subdivisions but excluding public trails and critical facilities or public infrastructure that cannot be located elsewhere;

Comment: subsection a is not relevant to the Hyatt proposal

b. Ensuring new development below the 160-foot contour line is sited and designed to minimize intrusions into the ridgeline through the application of appropriate height and setback restrictions

Comment: subsection B is subservient to the main goal of 9-23, and even if height and setback measures have been attempted but there is still lack of protection for broad views of upland slopes, the project fails to qualify for approval under this Policy.

c. Establishing standards for the Town Boulevard, other streetscapes, and large-scale landscaping projects to highlight and frame, **but not block, views of visual resource areas.**

Comment: there is no plausible way to state that this project will not block views protected of visual resource areas. The project as defined as 129 rooms or the 102 room Alternative 2 are both therefore inconsistent with Policy 9-23.

C-83.50

9-30. Dark Night Skies. Protect dark night skies as part of Half Moon Bay's scenic and visual character by preventing light pollution from development. Avoid impacts from exterior lighting on dark night skies, sensitive habitat areas, and agricultural operations by:

a. Limiting exterior lighting to low-intensity fixtures that are shielded, down-cast, and concealed so that the light source is not directly visible from public viewing areas, with the exception of traffic lights, navigational lights, and other similar safety lighting;

b. Limiting installation and use of high-intensity perimeter lighting and lighting for sports

fields, other private recreational facilities, or public facilities in scenic areas, with the exception of safety lighting provided that any high-intensity lighting is down-cast, shielded, and minimizes spillover; and

c. Reducing light pollution from greenhouses as a condition of approval for new development through shielding and other practices that minimize light spillover.

C-83.50
Cont.

Comment: in Table 4.1-1, page 4.1-19 (PDF page 93) the Draft finds the project to be Consistent, in that an exterior lighting plan complies with subsections a through c, this finding may be allowable. However, it is glaringly (no pun intended) internally inconsistent with another section of the Draft – fig 4.1-10, page 4.1-34, pdf page 108. Here we compare existing baseline site conditions at night, with only glimmers of light from Main Street housing visible through the trees along Main Street; compared with the visual simulation of the 102 room hotel configuration. Doing this in a couple of square inches on a piece of paper is in no way representative of the actual impact in real life, and specifically, the change from baseline conditions that will exist for motorists transiting Highway 1 at this site. Light spilling from guest rooms is an unavoidable and significant change and impact, a huge change from existing baseline, and to not call it out as such, and in fact to avoid even mentioning it in the findings regarding Policy 9-30 is a notable deficiency in this Draft EIR.

TAKING ISSUE WITH VARIOUS STATEMENTS AND SECTIONS OF THE DRAFT EIR:

C-83.51

This large document is rife with statements indicating bias in favor of the applicant, as well as both omissions and misstatements which are quite important when considered in the context of the entire document. This is a strong, but unfortunately necessary and unavoidable statement. I also understand how this can happen, despite best intentions and I have been told that Circle Point is a good firm – when a consultant has worked on a project for a good number of years, you develop a relationship with the project, if not with the Applicant himself. There is some degree of personal investment in your work product of the EIR resulting in a project being built. We are all human, this kind of bias exists, that is simply a fact. To the extent that it has crept into the analysis here, especially the analysis bordering on recommended support for Alternative 2 in Chapter 5 of the Draft EIR, it must be identified and responded to.

Page 4.1-12, page 86 pdf:

C-83.52

The project site borders SR-1 and would therefore be visible from this corridor. However, the project design would draw upon the existing aesthetic character of Half Moon Bay to reflect and emphasize the visual resources surrounding the project site.

Comment: without trying to be disrespectful to the authors of the report, this is word salad which means nothing, and appears quite biased. You cannot “emphasize the visual resources surrounding the project site” by blocking the views of those resources. That is simply gaslighting. The project visible from SR-1, 34 feet tall and over 450 feet long is hardly drawing upon the existing aesthetic character, nor does it emphasize the visual resources surrounding project site – it in fact obscures and blocks views of the protected visual resources. This building would be by far the largest structure in the downtown area, and it comes at a transition zone from open fields to a developed cityscape – that would seem to mandate buildings of lower proportions to ease that transition, which would also at lower height to eliminate the clear conflicts with protection of visual resources, i.e. inland hills to the north, east, and south.

Page 4.1-12, page 86 pdf:

Furthermore, as described later in this section, recent Coastal Commission consideration of the fire tower project to of the project site provided guidance to the City for implementing scenic corridor requirements. Therefore, all regulations and policies regulating scenic corridors and visual resources would apply to the project site.

C-83.53 *Comment: this paragraph is true on all counts. However, it merely serves to highlight the inconsistencies of bulk and massing of this project with those relevant regulations and policies regulating scenic corridors and visual resources. The project as presented is inconsistent with regulations and policies of same. I will return to discussion including Coastal Commission guidance arising from appeal of the fire tower project later in these comments.*

Project design is consistent with these regulations and those under the California Scenic Highway Program.

C-83.54 *Comment: this statement is clearly false and biased. This statement is another glaring example of why certification of this EIR must be denied.*

Pages 4.1-15, 16, pdf pages 90, 91

Pursuant to Section 18.37.030(B)(5), new developments should address views of the inland hillsides from SR-1 to evaluate the extent to which development obstructs skyline ridgeline views.

Parking included with project design would be substantially screened from motorists on SR-1 by the building massing.

The project as proposed would partially interfere with longer distance views of ridgelines and hillsides due to the height of the buildings and rooflines.

C-83.55 *Comment: while this sounds like a clear acknowledgment of significant and unavoidable impact on protected visual resources, please note 2 things: the phrase "partially interfere" is a function of the very careful selection of Viewpoints 2 and 3 as discussed earlier in these comments; along with a deliberate omission of consideration of views to drivers and passengers transiting across the length of this site, as well as on approach from both North and South. As has been called out previously in these comments, Coastal Commission guidelines require consideration of vistas available to motorists on Highway 1 (ref. opening sections of Chapter 9, LCLUP). The Draft appears to have deliberately omitted these considerations, and is therefore again inadequate. The language used in the Draft has the function of structurally and technically minimizing the actual and obvious impact on visual resources of this project.*

Page 4.1-22, pdf page 96

Discussion of Impacts

C-83.56 Aes a) Would the project have a substantial adverse effect on a scenic vista?
Impact AES-1. The project would have a substantial adverse effect on a scenic vista. Significant.

- Comment: this impact is mentioned in relationship to Project 129 room, but it clearly applies to Alternative 2 as well as a significant and unavoidable impact. There is problematic, biased and selective language used in the passages following in the same section of the Draft:*
- Buildout of the project also has the **potential** (*1) to impact the long-range views of hillsides and ridgelines to the north and east of the project site (Viewpoints 2, 3 and 4). (*2) Views of the hillside from SR-1 and from the Naomi Patridge Trail have the **potential to be obscured** (*3) by the project. As shown in Figure 4.1-7 through Figure 4.1-9, the ridgelines would be visible from Viewpoint 2 (*4) but would be interrupted from Viewpoints 3 and 4. The LCLUP identifies the longrange views of the ridgeline (*5) as a scenic vista, and therefore Viewpoint 3 represents a protected view according to LCLUP policy. Viewpoint 4 represents a viewpoint of public interest.
- *1: *“potential to impact long-range views” – use of the word “potential” is minimizing language, dancing around clear fact of demonstrated impact long-range views.*
- *2: *by previously limiting the Viewpoints from which the project is evaluated rather than taking the more organic approach of the experience of transiting past the site, this sentence ignores impact of views looking towards the south, when viewed obliquely from the north of the project. **Code and LUP protect ALL views of hillsides and ridgelines.***
- *3: *again, use of minimizing and obscuring language – it is not potentially obscuring views, it is in fact obscuring views*
- *4: *another inappropriate reference, limiting consideration of protected views to the ridgelines alone, while Code and LUP unambiguously and consistently confer protection upon views of inland hillsides and upland slopes. It should also be noted that from just a few feet north Viewpoints 2 and 3, and from comparable locations to the north of the project site, the impact on the viewshed is much more pronounced. This again speaks to inappropriate limitation of view shed analysis as a significant deficiency of this Draft. These objections to language of the Draft in fact apply to Alternative 2 as well, despite protestations to the contrary later in the Draft by the authors.*
- *5: *again, the Draft refers to ridgeline views as protected, while consistently ignoring LUP protection conferred upon hillsides and upland slopes. Taken in their totality, these are significant omissions and uses of language which indicate bias in favor of the Applicant in this Draft. It needs to be pointed out yet again that by selecting Viewpoint 4, rather than allowing consideration of impact on views from motorists, as recommended and required by Coastal Commission guidance, the Draft is again minimizing the impression of impact on protected visual resources.*
- Page 4.1-22, pdf page 96, continuing to subsequent page:
There are enough problems with the following passage that comments will be done in line, ***italicized***
- However, the project would interfere with the protected long-range scenic views of the ridgelines (***again, mentioning only ridgelines without acknowledging impact on protected hillsides and slopes***) north and east of the project site from SR-1 (Viewpoint 3). (***Draft avoids discussing impact upon motorists transiting the highway adjacent to the project, and on approach from both North and South***)
The project site is below the 160-foot contour line identified in LCLUP Policy 9-23, and the site design

C-83.57
Cont. incorporates deep setbacks from SR-1 to minimize visual intrusions into the ridgeline from the SR-1 view. **(Code and LUP PROHIBIT intrusions into the ridgeline, so merely minimizing them is not adequate)** Additionally, the project design also includes design elements that minimize massing of the proposed 2- to 3-story high buildings, such as incorporating the third story of the lodging buildings within a dormer roof form and by stepping the height down toward the southern gateway corner. **(These statements refer to Project 129 room, but are misleading by omission whether with respect to Project 129 or Alternative 2 – as both the 2 and 3 story buildings have the same building ridgeline/roofline height)** Despite these design considerations, views of the ridgelines **(impact on views of upland slopes and inland hills must be considered but are not mentioned here)** are obstructed as viewed from northbound SR-1 approaching the project site from the south **(as with many other places in the Draft, this narrative ignores the obvious and significant effect upon visual resources when viewed from the west towards the east, as well as while traveling southbound on Highway 1)**. Therefore, there are no other feasible measures, that would reduce the impact to the scenic vistas given the mass and scale of the project, and this impact is considered significant and unavoidable. **(This statement applies equally to Alternative 2)**

Page 4.1-28, page 103 pdf:

C-83.58 Visibility of the project site is high given that public views are available from almost any direction and are only impeded from the north by the James Ford Auto dealership. As shown in Figure 4.1-6 through Figure 4.1-9, the project site and its general surroundings are relatively undeveloped and contribute to the open space in southern Half Moon Bay. Public viewers generally include motorists traveling along SR-1 and Main Street, daytime recreationalists along the Naomi Patridge Trail to the west, and residents or visitors from the residential homes and commercial building east of the project site.

Comment: this passage accurately and adequately describes baseline conditions at the site, mentioning how they contribute to the feeling of open space in southern Half Moon Bay. This paragraph also specifically calls out public viewership including motorists traveling along Highway 1, which indicates that those views must be taken into consideration when assessing Visual Impacts – the cursory and quite selective nature of Viewpoints 2 and 3 does not adequately capture the experience of motorists traveling along Highway 1, and the Draft is therefore in conflict with its own statements of baseline conditions, and the importance of those baseline contentions conditions to the intrinsic properties of Half Moon Bay.

Page 4.1-31, page 105 pdf:

C-83.59 As described above, implementation of the project would substantially degrade the quality of public views of the project site and the surrounding area, specifically the long-range views of the ridgelines available from Viewpoints 3 and 4; while the change in visual character of the adjacent neighborhood is reflected in Viewpoint 1. Changes to the project site would be consistent with the developed nature of Downtown, although the buildings are significantly larger and present longer facades than existing development patterns throughout Downtown and in the immediate neighborhood.

Comment: this paragraph omits reference to hillsides and slopes, which is a deficiency. The last two sentences of this paragraph are rather internally inconsistent, because I don't see how the buildings can be "significantly larger and present longer façades than existing development patterns throughout

C-83.59
Cont. | *downtown and in the immediate neighborhood”, while at the same time being considered “consistent with the developed nature of Downtown”. This is a nonsensical paragraph, and appears to be verbally constructed with bias in favor of the Applicant, trying to find some way to make this project acceptable. The bulk of the paragraph talks about negative impacts, with one sentence in there then illogically declaring that despite all impacts and those problems, it would be consistent with the developed nature of Downtown. Comments here apply equally to both Project 129 and Alternative 2.*

Page 4.1-32, page 106 pdf: Light:

C-83.60 | Nighttime light would be produced from interior room lighting, exterior lights and vehicles traveling to, from, and within the project site.

However, based on the character of the existing site (an open, unlit field) coupled with the general darkness of the southern end of the City, the presence of illuminated rooms and other hotel features including exterior pathway lighting and parking lot lights, the project would introduce a significant new source of nighttime glare. This can be seen in the comparison shown in Figure 4.1-10.

Comment: the Draft here acknowledges the Significant visual impact of nighttime views of the potentially developed site. However, please now consider the full text of:

C-83.61 | Mitigation Measure AES-2:
A lighting plan for any proposed exterior lighting must be submitted to the City of Half Moon Bay for review and approval.
Exterior lighting must be directed downward and away from adjacent properties and public/private right-of-way to prevent glare or excessive light spillover. Lighting bulbs must be limited to low intensity lights, including lighting for identification purposes. Landscaping lights must be limited to ground-level for walking/safety purposes. Significance after Mitigation. Mitigation Measure AES-2 would reduce lighting impacts associated with the operation of the project to a less-than significant level.

Comment: the narrative text of the Mitigation Measure AES-2 fails to comment upon, address, or mitigate the most visually prominent impact of light – that of light spilling from guestrooms across the currently dark site. The Draft is therefore inadequate and insufficient by failing to effectively address Significant findings that it has just identified.

4.1.5 CUMULATIVE IMPACTS, beginning on page 4.1-36; page 109 pdf, and concluding with:

C-83.62 | Notwithstanding the design and setbacks required of the project, it would still contribute to a cumulative impact on aesthetics and visual resources due to the permanence of the site aesthetics and the obstruction of hillsides and ridgelines from SR-1.

Comment: this conclusion also applies to Alternative 2.

The beginning passage of section 4.1.5 is:

C-83.63 | The recent, current, and foreseeable future projects listed in (and?) outlined in Chapter 4.0, Setting, Impacts, and Mitigation Measures could cumulatively impact the Half Moon Bay’s scenic quality in the following ways:

- Loss of visual resources within a state scenic highway

C-83.64
Cont. solicited. “Accomplished through a variety of ways” – it is impossible to determine the project Consistent without a plan at the very least proposed or outlined for this mitigation. The conclusion of “Consistent” is therefore unsupported and completely unsupported in this Draft.

Two pages later, the Draft finds justification for the loss of prime agricultural soil in other policy sections. However, this does not appear to remove the requirement for mitigation for the loss of prime agricultural soil. I also find the following statement problematic: **“Therefore, while the prime agricultural soils would be lost, the agricultural use had already ceased thereby contributing to the conversion of the farmland to non-agricultural use”** The Draft prominently fails to note that agricultural use of this parcel, which had been done for decades, was discontinued only when the Applicant bought the property for purposes of development approximately 10 years ago. So this appears to be a rather bootstrapped, self-serving conclusion or justification for application of policies which would appear to allow conversion from prime agricultural soil use. It may be legal, and proper, in the context of a CEQA analysis, but it smells bad. And it appears that mitigation for the loss of 3 acres of prime soil still needs to occur, with no plan presented thus far. Absent an approved mitigation plan, the Project/Alternatives cannot be approved.

Table 4.7-2 Project Annual Operational Energy Demand
Page 4-7.13, page239 pdf

Energy use of a new large commercial facility must be considered in the context of the existential crisis that we face regarding climate change. Consideration of this rather terrifying set of circumstances is admittedly not well addressed by CEQA, but as Planning Commissioners look at this project, I hope that it is prominent in their thought process. Both the City of Half Moon Bay and San Mateo County have aggressive climate policies in place, so any action to reduce the growth or increase of greenhouse gas production within the City, or as a result of development within the City, would be consistent with those policies.

C-83.65 I am not an expert on energy policy or usage, however table 4.7-2 has some pretty staggering numbers in it – all numbers presented are annual figures, so these are going to be ongoing impacts, not a one-time event.

I am unclear as to the current status of the City Electrification Ordinance, but if projected annual natural gas usage at 3,314,520 kBtu is to be replaced with electricity, the equivalent kilowatt hour demand for that energy component is 971,390 kWh. If natural gas use is continued, the 3.3 BILLION BTU of natural gas energy burned annually with concomitant GHG emissions is something to think about seriously.

That figure of 971,390 kWh (of equivalent natural gas usage) dwarfs the stated anticipated electricity usage which ranges between 443,825 kWh and 757,966 kWh, depending on the level of sustainability measures implemented. It tells us that the gas usage, or its equivalent in electricity, more than doubles, and perhaps triples the anticipated energy inputs to operate the hotel. It is unclear at this time whether PG&E can provide a transition to all “green” electricity, so this large energy use of the projected hotel must be considered carefully.

C-83.66 The next staggering set of numbers in this table relates to travel to and from the hotel – not specified in the table whether this refers to guests alone, or guests plus employees plus suppliers/servicers. In any case:

1,051,091 annual miles travelled, resulting in consumption of 41,219 gallons (2022) and 37,339 gallons (2030) of fuel (gasoline/diesel) annually.

These seem like very large numbers in and of themselves, and rather alarming. I'm sure that there are standards to be used in executing an EIR when evaluating a hotel project, industry standards for VMT, etc. However, even a cursory evaluation of these numbers would seem to suggest a gross underestimate of fuel consumption:

1,051,091 annual miles divided by 365 days in a year is 2880 miles (Vehicle Miles Traveled – VMT) per day for the entire hotel. Let's assume for sake of argument 50% occupancy, which is what HMB hotels are running currently, which means 51 guest rooms occupied out of 102 proposed. 2880 divided by 51 is only 56.5 miles per guest room per day, which seems quite low. If that total is supposed to include employee travel as well as supplier and service truck travel (with proportionally more emissions for larger vehicles), the figures become even less plausible, but let's stick with these guest room figures for sake of argument. If a higher occupancy figure was used in these calculations (not disclosed as far as I can tell), that further decreases theoretical miles traveled per guest room per day, which makes the figures presented even less plausible again. For example, at 100% capacity of 102 rooms, VMT per room per day is 28 miles per room per day, which is most certainly unrealistically low.

C-83.66
Cont.

The problem is, these figures do not seem plausible considering our relatively remote location, and the distance from which guests will travel to reach this proposed hotel. I would imagine that not many of the guests are going to come from within 20 miles, few from San Mateo, and many more from at least the other side of the bay, more likely the Central Valley, or points even farther afield. The analysis doesn't seem to consider air travel to get to the San Francisco area either, which is a major GHG production activity. Daily VMT per room also must take into account local trips out from the hotel room to the beach, other attractions, food, shopping, etc. – and those shorter distance trips generally involve more stop and go travel which, at lower MPG, has thus even more negative environmental impact. Figures in the Draft presume a decrease of only 10% fuel use between 2022 and 2030, and while we all hope to see full conversion to electric vehicles, the figures used here in this analysis do not anticipate or bear that out. Supplier vehicles, service vehicles, all heavier truck traffic with lower MPG and higher emissions, will of necessity be coming from longer distances – as opposed to a hotel which is built in an already thoroughly urbanized environment, with suppliers practically around the corner.

So, the back of the envelope calculation tells us that fuel consumption for travel to and from the hotel is very likely grossly underestimated, perhaps by factor of 2X or 4X. The Consultants may well reply to my comments here by saying that they used industry standard calculations, and therefore statements within the Draft are considered accurate, informative, and adequate. However, I would ask the Planning Commissioners look at the common sense evaluation of these numbers when considering the potential impact of this large commercial development on greenhouse gas production, with attendant impacts of global warming, sea level rise, and coastal erosion. Etc.

GHG a-2) Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? Operation - Less than Significant

Page 4.8-14, page 256:

C-83.67 The CalEEMod model and the project vehicle trip generation rates were used to estimate daily emissions associated with full operation of the hotel and its amenities. As shown in Table 4.8-2, annual project operational emissions are predicted to be 609 MT of CO₂e in the year 2022 and 548 MT of CO₂e in the year 2030. The project would not exceed the 660 MT CO₂e/year bright-line threshold in either the opening or future years. Therefore, the project's GHG emissions would not be an exceedance. This would be considered a less than-significant impact.

Comment: I'm certain that the consultants used CEQA-standard methodologies and applied regulatory standards in this assessment. However, if the numbers in this paragraph and the conclusion of "Less Than Significant" does not make your hair stand on end, something is very wrong. The narrative text implies that if CO2 emissions do not exceed the "bright-line threshold", the effects are "less than significant", by strict CEQA analysis. The category of "Less than Significant" takes in a rather broad range, that of barely noticeable, i.e. anything greater than no impact, to nearly catastrophic. Considering that operational emissions predicted are within 10-20% of that bright-line threshold, it must be acknowledged that the GHG impacts from this proposed project are at the very high end of what passes for "Less Than Significant" under CEQA. CEQA standards were established a good number of years ago. In the intervening years and decades, we have come to understand the science of global warming more thoroughly, and realize that we are approaching, at, or are beyond a tipping point, with many changes regarding ice sheet and snowpack melt, changing precipitation patterns, etc., going through gyrations and changes much faster than anticipated by any models that we have used to date. In light of these pressing realities, a technically yet barely compliant GHG emission profile from a proposed large commercial enterprise should be considered for denial, or at least significant downsizing to minimize climate impacts.

SECTION 4.10 -HYDROLOGY AND WATER QUALITY

Beginning Page 4.10-1, page 273 pdf

C-83.68 I am not commenting on any specific aspect of this section, due to lack of subject matter knowledge. However, I will offer, based on real-world observation of this parcel, some significant skepticism as to the feasibility of effective stormwater management, in light of hardscaping 3 acres of the 5 acres available.

I have previously submitted into the record to the Planning Commission photos documenting significant inundation of the site during a heavy winter four or five years ago. Those prior comments are incorporated here by reference. Roughly 50% of the parcel was under 6 to 12 inches or more of standing water for a period of at least four months. This persistent inundation extended well beyond the boundaries of the delineated wetlands. The last few winters have been pretty light on rain, but when (not if) we get an average or above average rainfall year, those conditions will be repeated. There was standing water over what is intended to be a substantial portion of the footprint of the guest buildings and lobby. The planned bike trail would be completely inundated in these conditions. The planned southern extension of the parking lot for the car dealership would also be underwater, with potential damage to very expensive vehicles. Water that sheetflows into this site now and accumulates, neither infiltrates quickly, nor flows off-site quickly through whatever drainage is provided under the Caltrans right-of-way.

Inundation conditions observed during that heavy winter will no doubt be worsened with 3 acres out of the 5 being paved over or built upon. Further contributing to the problem is that the new City gateway structure/mound at the southern tip of the triangular parcel has raised the soil level in an area which

was previously low, and acting as a catchment basin, or temporary reservoir for accumulation of the sheet flow across the site. That square footage of catchment is no longer available, and the water is going to decide where it wants to go.

C-83.68
Cont. I think the landscape architects and engineers have a much bigger task ahead of them than they might anticipate, and irrespective of my misgivings about the project in general, I honestly fear that the ground floor of the hotel itself may suffer flooding on a fairly regular and recurring basis. Considered in this light, the historical seasonal farm land use for this 5 acres was a very appropriate use, a more appropriate use of this parcel.

I ask that Staff evaluate (beyond my expertise) the water management plans for this project – if any of the water from the hardscaping (buildings and parking lots) is to be directed to storm drains to off-site any portion of that water, then it must be considered if moving that water off site will negatively impact the delineated and protected wetlands, which now receive all of the water which accumulates on the site.

4.15 TRANSPORTATION AND TRAFFIC

Starting 4.15-1, page 370 pdf:

C-83.69 This is a challenging section for comment. That in large part is due to the disconnect between the technical requirements of commenting under CEQA on traffic impacts as compared with real-world, real-time observations of conditions on our roadways which are plainly obvious to both residents and visitors to our city. It is my understanding that CEQA analysis of traffic impacts requires utilizing Caltrans methodologies and Level of Service (LOS) standards for both roadways and intersections. These standards appear to have been published in 1994, nearly 30 years ago. It is certainly possible that using these strict interpretations and applications of standards, that the analysis presented in this Draft are technically correct and adequate. However, they are completely disconnected from reality, as discussed following.

I am appreciative of the fact that the study was conducted in 2018, before the onset of pandemic, work from home, and current high gas prices. Those conditions cannot be expected to last forever, although they are at this point in time resulting in reduced congestion and vehicle traffic in general (for which many of us on the Coast are quite grateful). But just in the past few months, and specifically since school restarted in the past several weeks, and people are beginning to return to working in office and commuting, we are seeing increased traffic, increased congestion, and return towards 2018 conditions, which were described by many as intolerable. We know anecdotally that many people feel trapped in their homes at peak periods, and for much of the weekends, and that coastal residents avoid coming into HMB because of the traffic, despite traffic studies in this Draft assigning LOS no worse than C during any of the study time frames. The current decreases in traffic are not going to last forever, so the baseline of 2018 would appear to be appropriate. As a specific example, I had the opportunity to observe southbound Highway 1 at 8 AM on August 23, 2022, a Tuesday after school had resumed, and traffic was solid, moving only very slowly all the way from the light at the harbor down to at least the intersection of N. Main St. with Highway 1 (I did not have the opportunity to observe conditions further south on that day). That is over 3 miles of solid, slow-moving traffic, which is routinely observed at commute times. Over Labor Day weekend, traffic through the Rt 1/92 intersections and downtown streets did not clear until after 10 pm. This is not a situation we want to see worsened, yet, we are mandated to create 450 new housing units in the near term, even absent large commercial development such as the proposed Hyatt.

C-83.69 Cont. In addition to the logical disconnect described in the first paragraph of my comments on the section, there is a large problem (I avoid using the term “significant” here, as that has specific legal meanings under CEQA), specifically regarding the time frames chosen for study:

Page 4.15-3, page 373 pdf:

Operating conditions during the weekday a.m. (7:00 – 9:00 a.m.), p.m. (4:00 – 6:00 p.m.) and Saturday midday (12:00 p.m. – 2:00 p.m.) peak periods were evaluated to capture the highest potential impacts for the project as well as the highest volumes on the local transportation network. The morning peak (a.m. peak) hour reflects conditions during the home to work commute as well as the school morning drop-off period; the evening peak (p.m. peak) hour typically reflects the highest level of congestion during the homeward bound commute; and the Saturday midday peak represents the period of highest volumes occurring on a weekend attributable to recreational or leisure trips.

C-83.70 *Comment: the weekday morning and evening periods are properly selected in my opinion. However, the Saturday midday segment selected for analysis described as peak period is plainly incorrect. It would appear that this 120 minute time frame was selected because it demonstrated the highest vehicle volume at the study locations on a Saturday. However, as anybody who lives in or visits HMB can attest, the peak impact and congestion on roadways occurs towards the end of a Saturday or Sunday, during the daily tourist exodus. This would be between 4 PM and 6 PM or between 5 PM and 7 PM, in all likelihood. Vehicle count on subject road segments during these late afternoon and evening times are necessarily decreased from what we see in the noon hour, simply because the roadways are gridlocked at that point, decreasing the number of vehicles passing any given study location.*

The text of the Draft, when carefully read, reveals that differing standards were used to select weekday versus weekend study time frames – weekday commute periods were acknowledged as having the highest level of congestion, whereas the Saturday analysis looks at highest traffic volume, rather than using a similar analysis of time frame of highest congestion. This is a vexing inconsistency in methodology. As a result of improper selection of study timeframe, conclusions drawn from the traffic study are therefore incorrect, inadequate, and inappropriate. That said, given the regulatory constraints in evaluation and reporting, I honestly do not know if going back and reevaluating based on end of day Saturday conditions would result in any different conclusions in the very strict and artificially constrained CEQA analysis.

Next, it will be helpful to look at the CEQA-mandated utilization of Caltrans standards that are used in the analysis. As with many other topics in the Draft, I am not an expert on traffic, but I can look at data as it is presented, and form a reasoned opinion.

C-83.71 LOS is presented as V/C, that is Vehicles/roadway Capacity, on an hourly basis. The resultant ratios correlate to Levels of Service A through F, with A being basically free flow, and F being rather impenetrable, to use a non-CEQA term. The problem is that the Caltrans standards established for different types of roadways are in fact plainly aspirational – two lane segments of major arteries are given theoretical capacities of 4400 vehicles per hour in a given direction, and single lane segments are given theoretical capacities of 2200 vehicles per hour. Due to the fact that our arterials of Highway 1 and Highway 92 within city limits are signalized, as well as having uncontrolled intersections, traffic is anything but free-flowing, even under the best conditions. Those roadways will never achieve the capacities of 2200 or 4400 vehicles per hour.

Please refer to Table 4.15-1, page 4.15-9; page 379 PDF:

From this we can see that during the high congestion, effectively close to gridlock conditions during commute hours, Highway 1 is consistently maxed out at approximately 1400 vehicles per hour. But when comparing that to the rated capacity of 4400, we get the V/C ratio of 0.318, which corresponds to LOS B, which doesn't sound that bad on paper. But in fact it represents the maximum carrying capacity of our roadways – we know this because the commute times studied are times when traffic is moving extremely slowly through the region. Since we are not given data on the late afternoon Saturday timeframe, we do not know the number of cars transiting the study locations, but due to well-known gridlock at those times, the vehicle count is likely considerably lower, which would give the artificial and quite useless determination of LOS of level B, or perhaps even Level A, which according to this analysis would represent free flow conditions, when in fact the reality on the ground is that no one is moving.

In summary to this discussion, LOS B and C are assigned to what are known to be peak congestion periods, but these designations are not reflective of conditions on the ground.

However, the Draft identifies 575 new vehicle trips per day as result of the buildout of the proposed hotel. I did not find (could be my fault) what percentage hotel capacity this was based on, so I will simply take that 575 figure at face value. It roughly comports with what I would imagine as reasonable for a hotel of 102 or 129 rooms. The Draft then superimposes those 575 new vehicle trips on studied roadway segments at specific times, and concludes that there would not be a significant impact from this increased traffic. This is no doubt the logic that has been applied to every other development that has occurred on the coast in the past 40 years. If that logic was in fact rooted in reality, we would not be experiencing the ever increasing real-time roadway capacity limits and congestion, and frustration and exhaustion that we all feel as residents of the area. Recall, "less than significant" does not mean there is not an impact. It just means that it does not rise to the somewhat arbitrary level of Significant.

C-83.72

Comments here must address a problematic statement which was made by the Applicant as far back as 2018 or perhaps 2017, and accepted and reiterated by the authors of the Draft EIR. Specifically, and admittedly counterintuitively by the Draft authors, the contention that the hotel project has the potential to decrease traffic, rather than increase traffic. As Commissioner Benjamin pointed out in the August 9 Study Session, data supporting this conclusion in the Draft could be an artefact of two point analysis, where creating additional bottleneck at the south end of town near the project could transiently decrease traffic at another intersection, for example, at Kelly Street, or intersection with Highway 92. The contention of the Applicant was that people staying overnight at the hotel would not be driving out of Half Moon Bay and back in the next day (a rather unlikely scenario in any case). Both the contentions of the Applicant and the authors of the Draft seem rather strained and contrived in this respect – and, the supposition that the hotel might decrease traffic seems to necessarily rely on aspirational assumption that people will not use their vehicles to go to the beach, or specifically in the evening hours to drive out to a local restaurant for dinner. This logic is simply a house of cards, and was a marketing point for the Applicant when he said it in a Planning Commission meeting some years ago. It is alarming to see that it still has some life in it, as it is so easily debunked by simply realizing that hotel guests are quite likely to use their vehicles in the evening to go out to dinner, thereby generating additional vehicle trips, rather than decreasing trips.

C-83.73

These comments notwithstanding, regarding the logic and motivation for such statements, the data in the Table cited below, 4.15-12, shows an increase in vehicle traffic for all of the studied intersections

C-83.73 **and roadway segments during all of the time frames evaluated, and does not show any decrease. It**
Cont. shows increased vehicle traffic in every single cell of the column entitled "Added Trips". This plainly calls
into question statements made by Applicant as well as authors of the Draft (from Study Session).

Please refer to Table 4.15-12, page 4.15-39, page 409 PDF:

C-83.74 This table compares vehicle trips per segment studied under existing conditions as compared with
existing conditions plus proposed project. Having gone through these numbers, we see that the
proposed project adds between 1% and 3% additional traffic, depending on roadway segment and
timeframe evaluated. It is not delineated in the Draft what percentage increase would be required to be
designated "Significant" from a CEQA perspective, but I submit that a range of 1% to 3% is quantifiable,
measurable, noticeable, and impactful, most especially at during our peak congestion time frames,
which must be considered to include Saturday and Sunday evenings, which were omitted from this
Draft. Whether one is bound by CEQA terminology and methodology or not, 1-3% increase most
definitely represents an increase in traffic, which is an impact most undesirable to those of us living
here, nor enhancing the experience of visitors to our fair city. Along with all the other development
projects reasonably foreseeable, as well as those currently under consideration or in the pipeline,
impacts upon traffic from the hotel project must be considered Cumulatively Significant. These facts
must be considered by our Planning Commission when evaluating this proposed project.

To expand on that, rather stating the obvious, if this project increases traffic by 1-3% (as documented by
the Draft EIR), and then we add over 450 units of new housing (RHNA requirement), which would add
another 4-8% in all likelihood, other infill projects currently in the pipeline or actively under construction
for another few percentage points, additional known construction projects up and down the coast, and
the hotel 1-3% adds cumulatively to those reasonably anticipated and known projects, and suddenly
we're looking at 10, 15, 20% additional traffic in the relatively near term, which is Cumulatively
Significant by any measure, and will be negatively impactful upon both residents and visitors.

Another member of the public with more expertise in traffic analysis would likely be able to delve into
this topic in more detail than I, but I think these real world, real time, reasonable conclusions hold up to
scrutiny and are worthy of consideration by the Planning Commission, in declining to declare adequacy
of this Draft EIR.

INCONSISTENCY OF SECTION 4.15 TRANSPORTATION AND TRAFFIC WITH EXISTING CITY DATA:

Please refer to the Circulation Element of the HMB General Plan, specifically pages 71-82. This
document is available on the City website, and is incorporated here by reference.

C-83.75 Looking at the LOS tables on pages 71-82, we see "current" conditions, and anticipated 2035 LOS's.
Please note that the Circulation Element was published in November 2013, based on data collected prior
to that. It is plainly obvious that since 2013 traffic in HMB and across the Coastside has worsened
significantly. So, the "current" LOS stats have gotten worse in the intervening years. Contributing to
that, and not reflected in the 2013 study, the Tom Lantos Tunnels from Pacifica opened in March 2013,
which has contributed to increased visitation to the Coast.

2013 studies (data starting on page 71 of the 2013 Circulation Element) show many road segments and
intersections already at rather unpleasant LOS of D and E at many times and locations. Whether that is
"acceptable" or not is a matter of opinion. That has worsened since worsened, to 2019 pre-pandemic
conditions that made life on the coast quite challenging, delaying emergency services, providing delay

and inconvenience. To the layperson, LOS appeared to have already degraded towards or to the anticipated LOS projected for 2035, a most unpleasant situation.

I bring this Study into these DEIR comments because the LOS levels noted in this DEIR is inconsistent with data already on file with the City, from 2013. LOS levels in this DEIR, for the road segments, intersections, and time frames selected, purport to show conditions better than were documented in 2013, which is quite simply false. Whether this is an error from data collection methodology, an artefact of CEQA analysis methods, or from cherry picking locations, times, and road segments, I cannot know, but it is wrong. If you layer the additional 575 daily trips on top of the 2013 data, as opposed to the data from this DEIR, different conclusions about the impact of the hotel traffic may be obtained. It sure is not going to help.

These inconsistencies suggest the Draft EIR is inadequate and flawed in this regard, and either more study is required, or the Planning Commissioners can simply rely on personal observation to determine the adequacy of the Draft EIR regarding traffic impacts.

C-83.75
Cont.

5.3.2 SIGNIFICANT AND UNAVOIDABLE IMPACTS **page 5-6, page 446 pdf**
5.5.2 REDUCED INTENSITY, ALTERNATIVE 2 **page 5-12, page 4523 pdf**
6.4 SIGNIFICANT UNAVOIDABLE IMPACTS **page 6-6, page 502 pdf**

Commenting on the above three sections of Draft is extremely challenging, due both to their interconnectedness, and many points of inconsistency or omission within these three sections. I will try to be thorough and organized, but of necessity may be redundant with points made earlier in these comments. However, analysis and comparison of these three sections is really the crux of the arguments against the proposed Project and Alternatives 2 and 3 regarding impacts upon protected Visual Resources.

Part of the challenge lies in that both 5.3.2 and 6.4 refers to Significant and Unavoidable (SU) Impacts of the Project at 129 rooms, where the intervening section 5.5.2 discusses Alternative 2. As we have been advised that the Applicant now prefers Alternative 2, findings of sections 5.3.2 and 6.4 might be considered largely irrelevant, except for the fact that they are the point of departure for declaring SU impacts to be reduced to Less Than Significant (LTS) for Alternative 2 with respect to AES-1, AES-2 and AES-4. Table 5-2, on page 5-48, page 548 pdf summarizes these changes, however prominently noting that Alternative 2 retains SU impacts with respect to AES-3.

No doubt in the comments following, I will not be able to cover the literally hundreds of inconsistencies, omissions and incorrect statements in these sections of the Draft document, but will instead try to logically and concisely highlight the effects of the sum total of those inconsistencies and inaccuracies. And primarily, I seek to convincingly document that the **reduction of impact from SU to LTS for those three noted AES categories is arbitrary and unsupported**, rendering these conclusions inadequate in this Draft. To delve into fine-grained detail of all deficiencies in the language of the sections of the Draft would add considerable length to these comments.

Relying on analysis of City Code and LUP at other points in these comments, findings of Significant and Unavoidable Impacts regarding AES-1, 2, 3 and 4 are accurate in their basic conclusions in my opinion with respect to a Project of 129 rooms. However, as noted previously, there are many other sections of Code and LUP which were improperly omitted from analysis which would further bolster, support and strengthen the conclusions of Significant and Unavoidable in these categories. Please consider those

C-83.76

- comments incorporated by reference in this section. The purpose of documenting more thoroughly findings of SU Impacts is that it makes it harder to reduce those impacts to LTS levels when looking at Alternative 2.
- C-83.76
Cont. Without reiterating all the points previously mentioned in this comment document, the analysis of Alternative 2, Section 5.5.2, continues to inappropriately refer to visual impact on ridgelines, rather than impact on upland slopes, inland hillsides, as well as the ridgelines. These are material concerns, supporting claims of inadequacy of the Draft.
- However, calling out some specific problematic passages of Section 5.5.2 is necessary:
- Page 5-12, page 452 pdf:
This public and agency feedback identified the concept of a smaller hotel and addressed the need for additional housing in the city.
- C-83.77 *Comment: Yes, feedback from the public over the past six years has consistently stated quite clearly that the proposed Project, starting at 148 rooms, then 129 rooms, and now 102 rooms, is too large for the site, negatively impacting visual resources, traffic, energy use, etc.. It is also acknowledged that housing prices have risen in response to demand here, as well as elsewhere regionally, statewide, and nationally. Given the amount of cash floating around, especially in the Bay Area, you simply can't build your way out of the demand/supply imbalance, no matter how many market rate houses you build. And when we look at the context of all the discussion that has gone on in this city for the past several years about the need for truly affordable housing for people who have been living and struggling to live on the Coast for many years, one must conclude that the last thing we need is another dozen or so townhomes in the \$1 million+ range. To suggest that the housing component of Alternative 2 addresses a need of societal import is disingenuous at best.*
- Figure 5-61, page 5-15, page 455 pdf.
- C-83.78 *Comment: The site plan for Alternative 2 is shown here. When compared with the site plan for the Project at 129 rooms (Siteplan with respect to Wetland Areas, shown in Figure 3-3, page 3-6), some important observations can be made. First, the western end of the northern building on Project 129 rooms (Figure 3-3) was removed and consolidated into the guest room blocks of Alternative 2 as a requirement of complying with wetland setback. That was not an optional change, it is mandated by code and compliance, and accepted only reluctantly by the Applicant. When comparing the remaining guest blocks in Figure 3-3 with Alternative 2 as depicted in Figure 5-6, we see that the setbacks from Highway 1 of the main guest blocks are nearly identical, as both project iterations are shoehorned in to comply with required wetland setbacks. Thus, the visual impacts related to setback from Highway 1 are effectively unchanged between Project and Alternative 2 when looking at the main guest room blocks permitted under conditions of wetland setback. Also, quite importantly, the overall height of Alternative 2 is almost identical in height to the 129 room Project, in fact, one building in Alternative 2 is taller than a building in Project 129 – 33'9" vs 33'6". **Thus, we can clearly determine that the authors of the Draft are relying almost exclusively on the decrease in length of the project to make their declarations that visual impacts on AES-1, 2 and 4 are reduced from SU to LTS. The arbitrary nature of this downgrade of impact is unsupported, and is also contrary to language from the Coastal Commission, as will be discussed following. The key term here is arbitrary.***
- C-83.79 The following passages must conservatively be evaluated to represent bias by the authors in favor of Alternative 2 and the Applicant, because of the specific language used:
- Page 5-14, page 454 pdf:

C-83.79 Cont.	<p>Alternative 2 consists of two primary structures and an ancillary structure to reduce overall massing:</p> <ul style="list-style-type: none"> • A three-story structure (north building) consisting of guestrooms and employee areas • A two-story structure (south building) consisting of public space and guestrooms on the second level <p><i>Comment: as noted previously, this language implies that the south building is of lower height, when in fact both buildings maintain almost exactly the same (building) ridgeline profile across the entire length of the complex of buildings. This is documented by site elevations presented in this section of the Draft. When the height of the structures is considered from height above the lowest point of existing grade under the footprint, they are within mere inches of the maximum 36 foot height potentially allowed for this parcel; irrespective of overriding concerns and restrictions with respect to preservation of protected visual resources. In other words, the Applicant is pushing the limits with both the Project and Alternative 2.</i></p>
C-83.80	<p>The subject property extends a length of 894 feet in a north to south direction. Proposed structures for Alternative 2 have been reduced from spanning a length of 608 feet to 452 feet across the project site.</p> <p><i>Comment: These are factual numbers presented, and appreciated. They will be commented on in detail following. For now, note the immediately preceding comment that while Project compared with Alternative 2 decreases in length from 608 feet to 452 feet, the overall height is maintained across that entire span. And, if breezeway gap is increased from 16 feet to 32 feet, the overall length increases to 468 feet.</i></p> <p>Page 5-122, page 462 pdf:</p>
C-83.81	<p>The reduced building massing would be more reflective of traditional development and scale within the city.</p> <p><i>Comment: whether at 608 feet, or 452 to 468 feet in length, neither configuration can reasonably or plausibly be reflective of, or consistent with traditional development and scale within the city. This statement in the Draft EIR is rejected as biased and subjective.</i></p> <p>Page 5-24, page 464 pdf:</p>
C-83.82	<p>However, it is noted that it may be possible that Alternative 2 would interfere with a ridgeline view from areas adjacent to Viewpoint 2, but the analysis indicates that, given the speed of vehicles traveling on SR-1, such an interference would be fleeting. Further, the reduced massing proposed under Alternative 2 would not block as much of this view as the project.</p> <p><i>Comment: here again the draft uses both minimizing language and inappropriate application of Code and Policy. The word "possible" is inaccurate here, in that Alternative 2 DOES interfere with ridgeline views, from many points and angles (see photos in Appendix D). More importantly, Code and Policy protects ALL views of inland hills and upland slopes from Route 1, as noted many times previously. Significant in this passage in the DEIR is the use of the term "fleeting" to describe impact on views available to drivers and passengers of vehicles on Highway 1. This very deliberate use of terminology will be discussed in detail later, in conjunction with more detailed discussion of comment upon language used at Page 5-14, page 454 pdf which refers to decrease in project length from 608 feet to 452 or 468 feet. Finally in this passage, the statement that the reduced massing proposed under Alternative 2 "would not block as much of this view as the Project" while true, still leaves Alternative 2 presenting unavoidable and impermissible intrusion upon the protected views of inland hills and upland slopes as well as the ridgelines.</i></p>

Page 5-14, page 454 pdf:

C-83.83 As discussed in Section 5.3.2, Significant and Unavoidable Impacts, the project was found to have a substantial adverse effect on the ridgeline views
Comment: as mentioned many times, inappropriately confining analysis of impacts to the ridgeline excludes consideration of the protected views of hillsides and slopes, consistently and repeatedly setting the stage for minimizing the overall impact of both Project and Alternative 2. This pervasive misuse of terminology and application of Code and LUP language speaks to the inadequacy of this Draft EIR.

C-83.84 As discussed in Section 5.5.2, Reduced Intensity, Alternative 2, building setbacks from the southern gateway, Main Street, and SR-1 would each be substantially increased under Alternative 2. Given the above, Alternative 2 would have a less-than-significant impact to protected scenic vistas and scenic resources within a scenic corridor that are available from Viewpoint 3, unlike the project, which would have a significant and unavoidable impact at this viewpoint.

Comment: it is acknowledged that setbacks from the southern edge of the parcel have been increased as compared with originally proposed Project iterations. However, other setbacks (northern building) were increased because the Applicant was, and in fact has always been required to comply with setback requirements regarding wetlands delineated on the property. This is yet another example of internalizing a shifting baseline to justify Alternative 2, rather than comparing to actual empty parcel baseline conditions. The Applicant is required to comply with wetlands setback standards, and the initial project proposals were improper in this regard. Applauding the eventual concessions from the Applicant does not seem warranted. The claim of increased setback from Main Street is questionable at best as the width of the parking lot parallel to Main Street appears to be unchanged between project versions. It is the elimination of the southernmost aspect of the 129 room Project, the conference center, which allows the claim of increased setback from Main Street, but that applies only to that structure, not the main guest room blocks. The paragraph being commented upon here is therefore incomplete and misleading, largely by omission of detail and context.

Problematic here as well is the arbitrary determination that these changes justify declaring LTS Impact for Alternative 2. It is plainly obvious that Alternative 2 still impermissibly impinges upon protected visual resources, and is therefore inconsistent with Code and LUP in many regards, and in that context, declaring impacts as LTS is not supportable. In the context of additional comments above, this will also be folded into a more detailed discussion following.

C-83.85 While long-range views of the ridgeline would still be available from SR-1 and most other viewsheds surrounding the project site, Figure 5-11 depicts the obscured views from Viewpoint 4. Because the north building would be constructed at an angle on the project site, the view of the ridgeline from Viewpoint 4 would still be obstructed. Viewpoint 4 is not a protected view according to the City's LCLUP; however, it was evaluated due to community interest.

Comment: the statements regarding preservation of views (opening statement) in this paragraph are only possible because of the very narrow selection of Viewpoints for study, rather than considering the more natural experience of drivers and passengers transiting Highway 1 from either the north or south, where very slight oblique view angles towards the project site show a large structure (as clearly demonstrated by installed story poles), as compared with the existing baseline conditions of unimpeded views of the bulk of the inland hills and upland slopes above the trees bordering Main Street. The impacts of the Project as well as Alternative 2 upon protected visual resources has been again structurally diminished by the language used throughout this Draft EIR. In fact, with Alternative 2, views of hillsides and ridgelines are obscured for significant portions of the transit approaching and passing the

project site from both north and south. This is plainly visible with the story poles currently installed, and I suggest a field trip with Planning Commission, and members of the public, to lay the misrepresentations of the Draft EIR to rest. Note through the perimeters of the story poles and flagging, the clear view of hillsides and ridgelines to the east currently available, while directly in front of the 450 foot length of the project, as well as from aspects both north and south of the proposed buildings themselves.

C-83.85 Cont. *While Viewpoint 4 is not specifically protected by the LUP, it was identified as a point of study, and those simulations show complete blockage of hillsides, slopes and ridgeline across the full extent of the project as it sits in front of those protected viewsheds. Additionally, it must be considered that the simulations from Viewpoint 4 are substantially similar to the views experienced by drivers and passengers on Highway 1 which is specifically called out as a protected view corridor, so by extension, these impacted views from Highway 1 must be considered, and are even more considerable due to both increased proximity to the blocking structures, as well as the previously mentioned fact that probably 98% of the traffic through this area is in vehicles, rather than on the Patridge Trail..*

DRAFT EIR INADEQUATE DUE TO ARBITRARY NATURE OF CONCLUSIONS IN SECTION 5.5.2

At the heart of the Draft's support for Alternative 2 is the Draft's downgrading of SU to LTS with regard to AES-1, 2, 4. The previously mentioned narrowly selected Viewpoints for visual simulation analysis and discussion are quite important underpinnings of the conclusions of the current Draft. That reasoning and conclusions have been disputed and discussed previously in these comments.

I find it quite striking that the experience of drivers and passengers and motor vehicles on Highway 1 has been discounted and eliminated from consideration across greater span presented by the project. I believe that to be inappropriate due to Coastal Act and LCP language affirming the importance of viewsheds to visitors traveling through Half Moon Bay on Highway 1 (see previous in these comments).

The relevant passage of the Draft is:

C-83.86 **Page 5-24, page 464 pdf:**

However, it is noted that it may be possible that Alternative 2 would interfere with a ridgeline view from areas adjacent to Viewpoint 2, but the analysis indicates that, given the speed of vehicles traveling on SR-1, such an interference would be fleeting. Further, the reduced massing proposed under Alternative 2 would not block as much of this view as the project.

First, while in heavier traffic, speed of vehicles is greatly reduced which increases the timeframe of visual impact. Second, with the overall length of the project, at 452 or 468 feet under Alternative 2, PLUS the approximately 120 foot façade of the highway facing townhome development component of Alternative 2 (discussed in more detail several pages following in these comments), this nearly 600 foot direct impact, plus additional hundreds of feet of oblique view impact is arbitrarily dismissed as "fleeting". This rather defies logic and common sense.

It's better if we can base discussion and findings on fact and precedent, rather than relying on purely subjective application of terminology such as "fleeting", which is nowhere described in CEQA, and where the applicability of such a term to this project is quite questionable. Fortunately, prior Coastal Commission communication regarding an appeal of the project-adjacent fire tower in 2016 provides us with some very useful points of comparison, as well as clear language. That document is attached to these comments as Appendix C for your reference.

The Coastal Commission allowed the fire tower project to go forward, despite its acknowledgment that the upper portions of the fire tower blocked protected views of protected hillsides and slopes, as well as protruding through and above the ridgeline. The Coastal Commission found that the fire tower project “does not raise a substantial issue of LCP conformance”. At the same time, the Commission repeatedly and vigorously affirmed the applicability and importance of visual resource protection standards throughout the HMB LUP that was in effect at that time (since updated). This language as precedent is very instructive when looking at the current hotel project, and for other projects that will come before Planning Commission. Because of the importance of this precedent of interpretation and guidance from Coastal Commission, below is one of many passages from this 2016 document affirming the importance of visual resource protection:

*Although the City-approved project is not located on an upland slope, that does not mean that the ridgeline protection policies don't apply. **Indeed, the LCP intent is to protect the views of the eastern hillsides**, including avoiding development that projects above the ridgeline (see, for example, LUP Policy 7-10 and IP Section 18.01.010(G) cited above). In addition, the LCP makes clear that the area within 200 yards of Highway 1 is a scenic corridor to which specific requirements adhere. The City has taken the position, however, that these requirements only apply if the area is mapped on the visual resources map. Such interpretation is not adequately protective of visual resources, however.*

It needs be noted that with the more recent revisions to the LUP which have been certified by the CCC, code section reference numbers have changed, and the city has clarified further protections for views of upland slopes and inland hillsides.

C-83.86
Cont. Ultimately, on page 11 of the CCC document, it is stated “although this development will obstruct some limited existing views to the eastern ridgeline from Highway 1, it does so only in a fleeting manner...”

This is a key statement which can be used as guidance and precedent for the proposed hotel: ** Coastal Commission has used the term “fleeting” to describe the visual impact of the upward protruding elements of the fire tower. The side to side dimensions of this element of the structure which are described as presenting a “fleeting” impact is 25 feet.

By comparison, the authors of the Draft EIR here have ascribed a “fleeting” impact to a structure of 452 or 468 feet in length, and set significantly closer to the highway than the fire tower. Properly, project cumulative length must be described including the frontage of the townhome development component, so impressions would have to be based on 572 or 588 linear feet, to which this Draft EIR ascribes a “fleeting” impact.

So, while Coastal Commission has defined 25 feet of width as creating a fleeting impression, they have not in the determination on the fire tower described an upper limit to what they might consider fleeting (fleeting not being a CEQA-defined term).

The Draft EIR here describes Significant and Unavoidable impacts upon aesthetics AES-1, 2, 3, 4 with a project (129 room) described length of 608 feet. They then declare visual impact to be Less Than Significant with reduction of project length to 452 feet. (Again, improperly failing to consider the cumulative and associated frontage of townhome development as part of Alternative 2), increasing length of project to 572 feet)

I asked you to consider, quite simply, if 25 feet of width is fleeting in impact, and 608 feet is Significant and Unavoidable in impact, is 452 feet of length closer to 25 feet, or closer to 608 feet, and by how much? Coastal Commission, while not defining an upper limit to “fleeting”, does provide in their language some reasonably inferable application for looking at newer projects. This comparison of 25 to

C-83.86
Cont.

452 to 608, corresponding to fleeting (per coastal Commission), Less Than Significant, and Significant and Unavoidable requires some reasonable amount of logic and consistency be applied.

And, if one properly includes the approximately 120 feet of frontage from the townhome development in the length of the project Alternative 2, our comparison numbers are then 25 feet, 572 feet, and 608 feet.

And, if 608 feet in length had been declared to create a Significant and Unavoidable impact, then 572 feet in length (102 room plus townhomes) most certainly presents the nearly identical significant and Unavoidable impact, disallowing this Project or its Alternatives consideration for approval as presented.

I do not find it plausible, in either of these sets of comparisons, to decrease aesthetic impacts from SU to LTS for the project under consideration now, given that Coastal Commission has previously used the term "fleeting" to describe a mere 25 foot wide structure, which was also set back considerably farther from the protected view corridor of Highway 1 as compared with Alternative 2's components.

This clearly explains, from as many perspectives as possible, the arbitrary nature by which the Draft EIR are reduces SU impacts to LTS impacts, which appears to be illogical, incorrect, impermissible, and inadequate. If ultimately the Coastal Commission comes to be involved in the deliberations on this project, I look forward to hearing their input as how this project impacts visual resources as compared with the Half Moon Bay fire tower project they reviewed in 2016.

DRAFT EIR INADEQUATE DUE TO INCOMPLETE ANALYSIS OF IMPACTS OF ALL COMPONENTS OF ALTERNATIVE 2

Thus far, comments have addressed and responded to issues specifically raised by the Draft. Comment is here made on issues inappropriately not raised in the Draft regarding the full scope of Alternative 2 and its Impacts.

Applicant has described as his preferred alternative, the project as described as Alternative 2, with components of a 102 room hotel, plus 16 residential units (eight duplexes) to be developed to the north of the car dealership. Applicant seeks to have the Draft EIR which describes all of Alternative 2 declared adequate, and thus seeks a CDP and project approval for all components of Alternative 2. It is the totality of that project description which must be analyzed in the Draft EIR.

C-83.87

However, specifically with respect to protection of visual resources, the Draft improperly discusses only visual impacts related to the 102 room hotel component, omitting any discussion of townhome development impacts upon protected visual resources. The townhomes are within the 200 yard corridor of Highway 1, and existing baseline site conditions include views across that location to the inland hills, upland slopes and ridgelines as protected viewshed. As plans shown in Figure 5-1 demonstrate, the proposed townhome location would be right up against Highway 1, lacking even the setbacks of the guest room buildings to the south, and in fact with less setback than that of the previously proposed northern building under the Project described as 129 rooms. This proximity to the view corridor of Highway 1 would significantly increase and worsen impacts upon protected visual resources. By failing to consider these quite obvious facts, the Draft EIR is thus inadequate in this regard.

It is noted that several members of Planning Commission appear to share these concerns – towards the end of the August 9, 2022 study session, at timestamp 3:00:00 and following, both Commissioners Benjamin and Hernandez opined that there was need for a full project definition, description and analysis in order to consider adequacy of the Draft EIR. They were referring in these

C-83.87 Cont. | comments to the lack of detail available for the townhome component. Comments in the preceding paragraphs, and following sections highlight that inadequacy, and call out specific bases for declaring the Draft to be inadequate on these points.

Concerns about piecemealing impermissible under CEQA:

C-83.88 | Having identified the townhome development as a component of Alternative 2, the Applicant cannot at this time or a later date remove that from current consideration for approval of the project, and then yet later return seeking approval for the townhome development as a separate project. Having linked the two components in this Draft EIR, and identified those two components as related to each other, it would constitute textbook impermissible piecemealing to attempt to separate those components to gain approval for them as separate projects. You cannot unscramble an egg.

Visual impacts, determination of levels of significance:

C-83.89 | The Project described as a 129 room hotel had a length of 608 feet. Alternative 2 is described as having a length of 452 feet, or 468 feet with expanded breezeway. This difference in length is the basis of the Draft for arbitrarily declaring LTS visual impacts of Alternative 2 regarding AES-1, 2, 4 as compared with the 129 room project. This declaration is also incomplete and inappropriate. Having identified the duplexes as part of Alternative 2, one must consider that the side of the duplex development facing, and directly abutting Highway 1, with quite minimal setback, appears to be approximately 120 feet, reference Figure 5-1 (dimensions not provided on this figure). When we add 120 feet of townhome façade to the 452 feet of hotel façade, the full project is described as Alternative 2 has total Highway 1 facing façade of 572 feet, which is nearly identical to the 608 feet of the originally described Project at 129 hotel rooms. This further supports the argument that the Draft EIR is inadequate due to being arbitrary, incomplete and inconsistent in downgrading impact levels for AES-1, 1, 2, and 4 to LTS.

In effect, Alternative 2 has taken the northernmost guest room block from the 129 room project, and converted that to a townhome plan, placing it north of the car dealership. When looking at the full project described as Alternative 2, this makes it plain that there is no reduction in size or massing of Alternative 2 as compared with Project at 129 rooms. In fact, comparing figure 3-4 with figure 5-1, it appears that the footprint of the townhome component is greater than that of the northernmost building of the 129 room Project, which was also sited perpendicular to Highway 1.

This façade facing Highway 1 has less setback than previously removed north building of Project at 129 rooms, therefore impacts on visual resources are even more pronounced for this component of project described as Alternative 2. Specifically, the visual resource impacts of the proposed location of the townhome developments are greater and more significant than the visual impacts which were present in the now removed northernmost building of the 129 room project plans.

The townhome development component of Alternative 2 is subject to same visual resource protection standards as the rest of the project, but this has not been identified or analyzed in the Draft. It is my assertion that the visual impact of the 102 room hotel plus the townhome development as presented in Figure 5-1 is greater under Alternative 2 for the above-noted reasons, than the Draft's previously documented Significant and Unavoidable impacts upon protected visual resources for the Project at 129 rooms. If at a later date plans are presented which push the townhome development away from Highway 1, and provide dimensions and adequate visual simulations of visual resource impacts from this component of Alternative 2, additional analysis and comment will be necessary. But, as presented with information available in this Draft document, visual impacts of Alternative 2 are therefore anticipated to be greater than that of the Project at 129 rooms.

DRAFT EIR INADEQUATE DUE TO INAPPROPRIATE AND INACCURATE DESCRIPTION OF THE ENVIRONMENTALLY SUPERIOR ALTERNATIVE, SECTION 5.6

Page 5-33, page 473 pdf:

Operational: emissions for Alternative 2 would be similar to or slightly greater than those of the project.

And...

The residential units proposed as a part of Alternative 2 would result in relatively increased long-term emissions associated with vehicle emissions and solid waste generation.

And...

C-83.90

Alternative 2 would have slightly higher emissions than the project, but lower emissions than reported for the project in the 2020 assessment.

Comment: The Draft identifies that Alternative 2, including components of the 102 room hotel as well as the residential development to the north of the Ford dealership would have greater impact upon emissions and greenhouse gas production than the Project as defined by a 129 room hotel, though still falling slightly short of the bright-line limits discussed earlier.

Traffic page 5-38, page 477 pdf:

The commercial component and residential component proposed as part of Alternative 2 are anticipated to generate an average of 572 trips per day...This represents a decrease of three daily trips.

Comment: it would seem that a decrease in vehicle trips of less than 1% comparing Project (575 trips) to Alternative 2 (572 trips) is not worthy of consideration as a factor in determining Alternative 2 to be environmentally superior. Whether it is 572 or 575 additional trips per day, either of these still constitute a 1% to 3% increase in traffic at various study points at various study time frames (noted previously in these comments), contributing to essentially identical increase in adverse and undesirable conditions for residents and visitors.

Alternative 2 Biological resources: page 5-30, page 470 pdf and continuing from there:

The Draft identifies wetlands adjacent to the highway area proposed for the townhome subdivision. There is discussion of requirements regarding the 100 foot required wetland setback zone. However, this required modification is not presented at any point in the Draft nor site plans presented, specifically Figure 5-1. Thus, the project is not fully described, and is not ripe for consideration of adequacy of the Draft, nor issuance of CDP or project approval.

C-83.91

Wetland setbacks require further modification to the proposed Alternative 2, in that the townhome development will need to be pushed back away from Highway 1 to comply with wetlands setback requirements. This may decrease visual impacts from what are imputed from looking at Figure 5-1, but no matter where townhome development is contemplated on that site, visual resource protection standards must be rigorously applied. It seems inevitable that complying with wetland setback requirements on this portion of the proposed Alternative 2 will decrease the available footprint for the townhomes. Applicant may propose greater height to the townhomes to compensate for decreased footprint, but if that occurs at a later date, Staff and Planning Commission must be mindful of the impact of greater height of development here having increased impact upon protected visual resources, and such impacts must be thoroughly and adequately analyzed. No such analysis has been performed in this Draft EIR, thus rendering it incomplete and inadequate on this point.

C-83.91
Cont.

Alternative 2 cannot be described as “environmentally superior” if it’s admitted and described effects are greater than that of the 129 room Project, and more significant than that of the 129 room Project, even before consideration of the very important and prominent issue of application of Code and LUP policies regarding protection of visual resources with respect to the townhome component of Alternative 2. The inadequacy of the Draft EIR on this point is therefore plainly obvious. The Draft analyzes only the visual impacts of the 102 room hotel component of Alternative 2, and does not discuss or consider the additional impact upon visual resources from the proposed townhome development to the north of the car dealership. When comparing Project at 129 rooms to Alternative 2, it is only by limiting analysis of visual impacts solely to the 102 room hotel component, that the Draft can (arbitrarily) reduce SU impacts to LTS impacts. This is clearly incomplete, improper, and inadequate.

On a related note, the narrative describing the environmentally superior alternative folds in greenhouse gas and traffic impacts from the townhome component, thus identifying and confirming the townhome component as an intrinsic identified element of Alternative 2. But the environmentally superior narrative at the same time inappropriately omits visual impact considerations of the townhome component. Nonetheless, the townhome development has therefore been identified as a component of the overall project, and cannot be separated from it in analysis. In other words, the hotel component cannot be approved now, while deferring analysis, discussion, decision, etc on the townhome component to a later date. The project must be fully described prior to these next steps.

Final words:

C-83.92

The Coastal act, as well as City Code and the Local Coastal Land Use Plan are quite consistent in emphasizing the importance of protecting visual resources specifically described as views of inland hills, upland slopes, and ridgelines.

The full intent, and the implementation of these regulations serves the similarly well-articulated and straightforward goal of preserving the small town charm and character of Half Moon Bay. This is why people really want to live here, and really want to visit here. Preserving these characteristics is crucially important.

C-83.93

The Project at 129 rooms, and Alternative 2 at 102 hotel rooms plus duplex development both plainly fail to meet or contribute to the goal of preserving small town charm and character of Half Moon Bay; in fact, both project presentations significantly degrade and diminish small town charm and character. For this as well as the many technical reasons and objections raised in these comments, the Draft EIR cannot be declared to be adequate, and this process cannot proceed towards a CDP and project approval as currently presented.

END OF COMMENTS

APPENDIX A:

NextDoor Comments on a thread started by Pat Chimienti, current through Aug 21, 2022. These are comments and discussions in opposition to the Hyatt project. Comments off topic (as will happen on NextDoor) have been removed for clarity. Additional comments may be on line, these were pulled on or about August 27, just a few days after this thread was started. Full thread available at the following URL:

Notes from additional NextDoor threads below this one, starting on page 21 of this document.

https://nextdoor.com/p/S2LJcdxMHRsj?post=236125665&utm_source=email&is=tpe§ion=post&mar=true&ct=-EDIfMWEbqGW4-TJ0kBfBDwA3t5YcmP_ponVtRc4QC0aVodi5icjETu6etEQsB-A&ec=OWKiQRDj9vEHAYwTV6YMARldwuFdgGkeefhwfGYAE0s%3D&mobile_deeplink_data=eyJhY3Rpb24iOiAidmld19wb3N0IiwgInBvc3QiOiAyMzYxMjU2NjV9&link_source_use_r_id=7072316

Patricia Chimienti Alsace Lorraine • 14 Aug



C-83.94

The picture above is another large apartment/condominium complex that is being built already in HMB. We must not allow many of this type of development in our small town. This development got push through, but the 8 condos on The end of Main Street should not be allowed. Please watch this 6 minute video below. <https://youtu.be/RloA9S8mcpY> Regarding the Hyatt Hotel project. HMB does not need another motel, but the Big part of this project is the 8 buildings for up to 16-24 duplex units that are also planned to be built in that same location. The deadline for written comments is Tuesday September 13, 2022 by 5:00 PM at City Hall or via email at hyatthotel@hmbcity.com. All around the Peninsula there seems to be an excessive amounts of LARGE APARTMENT/CONDOMINIUM COMPLEXES being built over the hill and now it is starting in HMB. HMB has only two

C-83.94
Cont.

roadways in and out of town and with this excessive buildout will cause the population to increase substantially. Every weekend Hwy 1 and 92 basically become parking lots twice a day (either entering or trying to leave HMB). Aside from fog HMB is known for its wide open spaces and beautiful view corridors, these large developments will surely harm this. Also water for HMB is basically from local ground water wells and the addition population especially, during this drought period, will lower the water levels! Being so close to the ocean this could cause salt water incursion problems to wells! Since coming here and finally being able to move in my home in 1989, there have been attempts to build out this town. The first along the Ocean Shore railroad right away which would have opened up the 'privately owned' lots between the RROW and the Francis State Beach, and of course WAVE CREST which is across the freeway from where the HYATT Project and the Ford's group condos are planned. Please send your remarks before the cutoff date, Tuesday September 13, 2022 by 5:00PM.

[Kathy Catalano](#)

• Half Moon Bay

NO!

14 Aug

[Susie Mickelsen](#)

• Half Moon Bay

No to ANY NEW HOTELS we have more than enough already. We should encourage farming not tourism. All you have to do is buy one of our ignorant leaders a cup of coffee and they agree ... [See more](#)

14 Aug

[Addi G.](#)

• Half Moon Bay

I also share your concern for traffic and natural resources, particularly emergency response/evacuation and water access. I will say though that I've watched many council meetings where residents speak about the dire need for more and affordable housing on the coast and I hold hope that there is a way to balance the needs to preserve our environment and house our neighbors. It doesn't sit right with me personally to get in and then close the door behind me.

(edited)

1w

[Cid Young](#)

• Moss Beach

C-83.94
Cont.

Addi

The Planning Commission did discuss the 10 Year Housing Element as mandated by the State at their July Meeting. They are starting the process to make their projections of how many new housing units they will create for the next 10 years. The first up will be a multi unit complex at 555 Kelly Avenue. A three story building on a 6,000 sf lot near the Ted Adcock center and they will appropriate some of the parking lot from that Community Center as well.

https://youtu.be/_1JDD98lciU

14 Aug

[Dave Schorr](#)

- Kehoe/Casa del Mar

Cid Young

It's actually a 4 story building, way over the statutory limit for downtown. But farmworker housing can get an exemption. I fully support using the

... [See more](#)

4 days ago

2

[Julie Walters](#)

- Frenchman's Creek

I can't tell from the post where this construction project is, but I don't have any problem with condos being built on infill lots in the middle of town as long as they're not super tall and blocking the hill view. We need more housing that middle-income people can afford and the middle of town is exactly where it should be located, walking distance from amenities and schools.

14 Aug

[Susi Mickelsen](#)

- Half Moon Bay

Julie

I agree with you. But No to more hotels!

14 Aug

[Kathy Catalano](#)

- Half Moon Bay

Julie Walters

I believe this monstrosity is on the corner of Church and San Benito. This one snuck by.

14 Aug

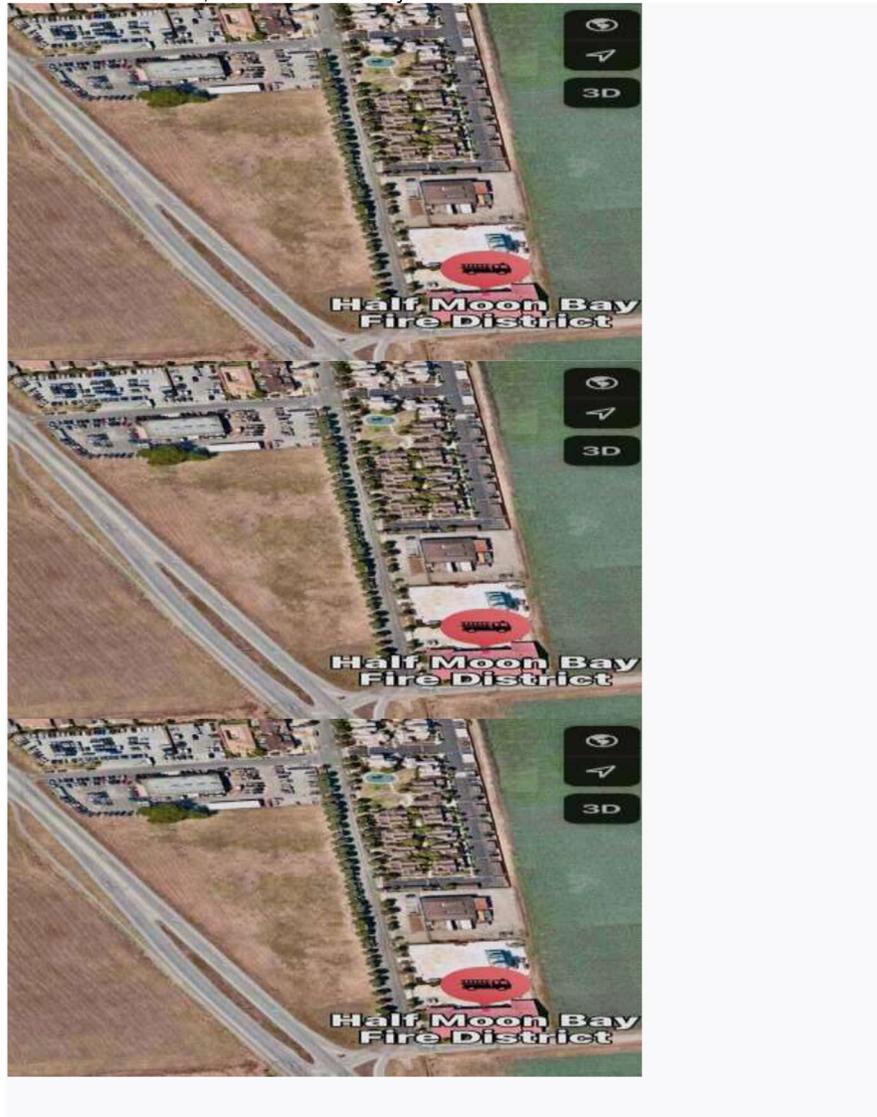
[Cid Young](#)

- Moss Beach

C-83.94
Cont.

Julie

If you watch the video it shows exactly where the 102 room Hyatt Hotel will be (if approved).
Between James Ford, all the rest of the way down to the end



C-83.94
Cont.

This would be a better site for low income housing than some that have been proposed. Close to downtown and close to 92.

14 Aug

[Patrick McKee](#)

• Half Moon Bay

“We need more affordable housing for teachers, firefighters, nurses and cops!!” But not here!!!☐☐

14 Aug

[Amy T.](#)

• Moss Beach

Patrick

placement is everything. The Hyatt site seems like an obvious one

14 Aug

[Michelle Stephens](#)

• El Granada

Where are our teachers supposed to live if there's no affordable housing? We NEED teachers desperately and they don't apply here cuz there's nowhere affordable to live.....🙄😞☹️

14 Aug

[Cid Young](#)

• Moss Beach

Michelle You will be happy to hear that they are considering CUSD parcels for affordable housing. <https://youtu.be/1JDD98lciU>

(edited)

5d

[Michelle Stephens](#)

• El Granada

Cid

considering is the key word there. I've worked for CUSD for almost 30 years. I'm not holding my breath.

[Rosemarie Willimann](#)

• Half Moon Bay

We agree with Patricia. This wonderful video captures the development history of HMB. We have been able through civic concern stopped many bad developments in the past. We have lived here in town for over 35 years. Our town has grown but by our sense of place has persisted. We must stop this hotel/ condo development.

C-83.94
Cont.

[Phil S.](#)

• El Granada

Hotels are great, people stay for a couple of days and move on, spending money before they go.

14 Aug

[Michelle A.](#)

• Montara

Phil we have enough of them already, with plenty of vacancies!

4 days ago

[Laureen Diephof](#)

• Half Moon Bay

Greed.

(edited)

1w

[Jessica Hope](#)

• Alsace Lorraine

Patricia

your video was very well done, and I appreciate your discussion of these significant issues! I am sad about the fact that it's a Hyatt going in, instead of a family-owned business. I love the the way that Main Street feels like a group of unique, friendly, family-owned, community-oriented businesses, which does not include corporate-owned, generic businesses with big parking lots. I think we should be aiming for the fun, pedestrian-oriented qualities of University Street in Palo Alto, Laurel Street in San Carlos, or downtown San Mateo, instead of the kind of unfriendly, car-oriented atmosphere of El Camino Real.

14 Aug

[Cid Young](#)

• Moss Beach

Jessica I AGREE, but this is a car-dependent community ... not to mention the Hotel will be for Tourists who will (maybe) be using Loyalty Points/Rewards to book their stay and the hotel will stand out and get "Corporate brand-name recognition" for bookings. It isn't a "No-Tell-Motel" sort of place.

(edited)

[Amy T.](#)

• Moss Beach

C-83.94
Cont.[Michael Kirkham](#)

• Creekside Residents

Shawna

, thats my point, they use the "Teachers need housing" as justification to build these new places, but when it comes down to it, most teachers don't qualify for low income but also don't make enough to afford the higher end. It's wrong that teachers are so underpaid and at the same time used as a campaign cry to push for more housing.

6 days ago

[Roberta Gelt](#)

• Moss Beach

I moved here -into a VERY small 1940's cabin- in 1980 and we were having these conversations and arguments then. Almost verbatim except for location. We fought the Beach House, we fought the Oceana and Harbor Village (is that what it's called? i've been there once) We fought all the little motels on Hwy one and on and on. I don't know what has to happen to make it stop but something does. Personally I think it's too late. It's already been "Carmel-ized".

14 Aug

[Cid Young](#)

• Moss Beach

Roberta

And, they want to turn our working Harbor into a Mimi- Monterey. Because each Developer gets their project approved in a vacuum, traffic that I refer to as the #HMBGRIDLOCK just keeps getting worse and worse. It won't change, except for the worse.

(edited)

5d

[Sally Stiles](#)

• Ocean Colony

Roberta

Yes I was young locals Were against this building and they campaign against it it was rumor we would not be Daly city which has planned a number of times by extremely wealthy corporations if you like Daly city (pardon just an example personal opinion) that's what they want us to do give them all of our money and then Big box stores and turn it into a slum property Most people don't stay it's not their town they don't care you can tell no respect throw down trash. To block the ocean view from the public. Why move here why not just stay in San Jose? To line the highways with these hideous examples I'm ashamed of my generation. But very proud of the previous generation. I'm disgusted these corporations think we are here to make them tons of money we are protecting our ocean for the future. 🙄

5 days ago

C-83.94
Cont.

[Nancy Rapp](#)

• Ocean Colony

That enormous obscenity, not yet finished is a blight and an eyesore and sticks out and above as a reminder what not to do in our village.

6 days ago

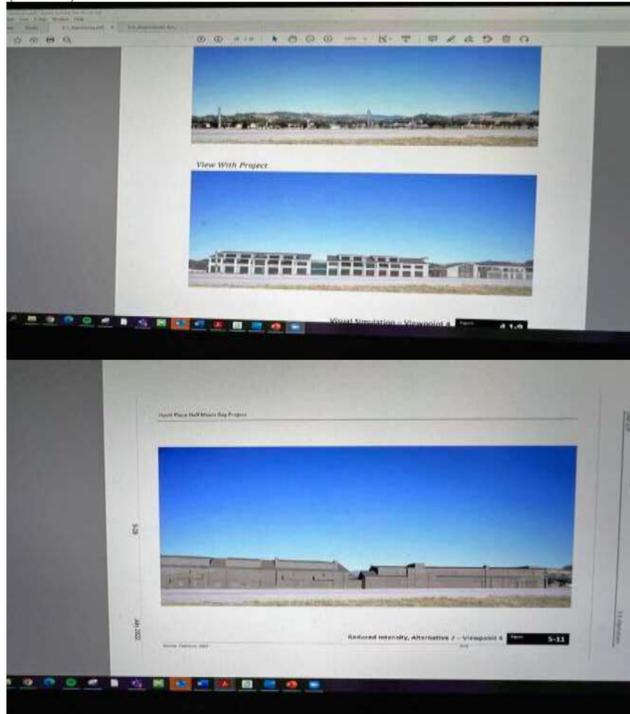
[Cid Young](#)

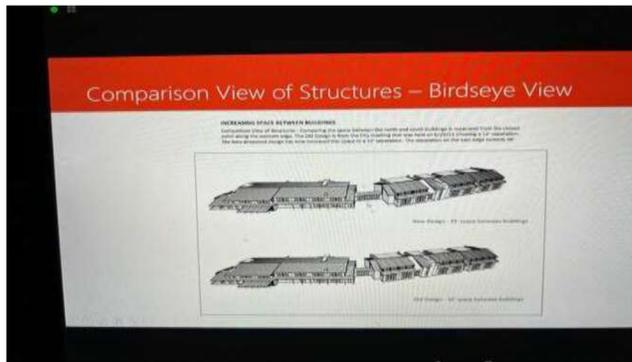
• Moss Beach

Nancy

The Village is long gone! It will be hotels, and houses on that lot, unless it's appealed to the CA CC.

(edited)





• • • 5d

1

Cid Young

• Moss Beach

More shots of the plans presented





- • 5 days ago

C-83.94
Cont.

[Nancy Rapp](#)

- Ocean Colony

Horrible. I wrote a letter of protest like it means anything.

5 days ago

[Jim Davis](#)

- Alsace Lorraine

Cid Where is that? Looks horrible, unlike the proposed Hyatt...

[Foster Duncan](#)

- Ocean Colony

Jim

photoshopped? Maybe? Maybe not. Who knows?

3 days ago

[Dave Schorr](#)

- Kehoe/Casa del Mar

These are the visual simulations provided by the EIR, they are from the vantage point of the Patridge trail on the west side of the highway - views to motorists from the highway will be even closer to the 34 foot tall buildings, so they will appear even larger than from this vantage point. The before/after comparison is pretty striking.

Just now

- El Granada

C-83.94
Cont. | This is ridiculous I know half moon bay is a tourist town and they bring the money, and everyone who makes money works out of town pretty much. BUT WHAT ABOUT THE COMMUNITY that lives here. Better Everything is needed for us to live out environment treat it well and I way love ourselves. If we feel extra in our own community because we're not tourists what's up with that. I remember when the beach house got too tall and they burned it down. right across from the old fire dept. But they built it back even taller than the first time. We cannot compete with corporate places it seems they all want a piece of the pie and have better lawyers and more money than us people wanting decency and capabilities to have a well rounded life away from the city hubbub
6 days ago

[Judy Taylor](#)

• Half Moon Bay

Stephanie B.

We don't matter to the Coastal Commission, We are here to serve visitors. We are a nuisance to them.

6 days ago

[Irma Morawietz](#)

• Frenchman's Creek

C-83.94
Cont. | Thank you Patricia for your video. I agree with you, we don't need another Hotel. I worked in most of the Inns and Hotels as a LMT for many years and they were rarely full. They had full occupancy during Pumpkin Festival once a year, the Inns were the exception. What about building a public swimming pool or a movie theater for locals?
6 days ago

[Cid Young](#)

• Moss Beach

Patrick

C-83.94
Cont. | And no Emergency Evacuation Plan to leave en masse, as we trample tourists on our way out of the clogged gridlocked roads if a natural disaster happens on a nice weekend - that infrastructure!
(edited)
5d

[Ann Mori](#)

• Kings Mountain

C-83.94
Cont. | The proposed Hyatt site would make a wonderful City park. Good for residents and a appealing entrance to the City of HMB.
6 days ago

[Ann Mori](#)

• Kings Mountain

Patricia Excellent video!

6 days ago

[Anne R.](#)

• Half Moon Bay

C-83.94 | You can't win - the coast is all about \$\$\$\$ now and caters to tourists and their pocketbooks.
Cont. | Another Carmel or any tourist attraction.

6 days ago

[Kathy Catalano](#)

• Half Moon Bay

Pathetic!

6 days ago

[Stephanie B.](#)

• El Granada

it like we people who live here are just in the tourists way. like we're just essential workers to keep everything going for the real people. I'm an essential worker and that's how it felt

6 days ago

[Robert K.](#)

• Kings Mountain

Stephanie

, I think you hit the nail on the head

6 days ago

C-83.94
Cont.

• Arleta Park

Building new housing is what we need

5 days ago

[Cid Young](#)

• Moss Beach

It will block the view of the hills.



5 days ago

[Foster Duncan](#)

- Ocean Colony

Cid

ok. I can't figure out the difference in these two. Other than the height of the trees. Neither the buildings nor the sign blocks the view. Just the trees in the second view. Just don't plant the trees? It can't be that simple. Please explain. Thanks.

5 days ago

[Cid Young](#)

- Moss Beach

Foster

Sorry, from Highway One, the views from the bicycle trail will block the views, according to the EIR. You might have to watch the L-O-N-G planning commission video for a detailed explanation. One of the photos I posted (the one that looks like a gray freeway sound wall) shows what the view would be like to a tourist or as they pass through Half Moon Bay on a bicycle or in a car.

(edited)

C-83.94
Cont.



• • 5d

[Melissa Thurman](#)

• Seahaven

Cid

C-83.94
Cont. You can't fight development because it may "ruin views". You can control your own property, but if someone builds around your property and impacts your views, that's allowed, as long as they meet all building and zoning regulations.

2 days ago

[Julie Walters](#)

• Frenchman's Creek

Sometimes viewsheds are protected under local zoning and planning ordinances.

1 day ago

C-83.94
Cont.

[Dave Schorr](#)

• Kehoe/Casa del Mar

Melissa Thurman

Well, that's exactly the point here – many separate passages in City Code, and it's Land Use Plan, which was certified by the Coastal Commission, specifically calls out views of the inland hills (not just the ridgeline itself) as protected visual resources. In other words, as viewed from Highway 1, yes, development can take place, so long as the views are not lost. So, this project runs afoul of many sections of City Code. I hope that enough people weigh in with the City to let their views be known. Write to HyattHotel@HMBCity.com Writing about it here is not part of the official record for this project.

Just now

[Rick Southern](#)

• Miramar

Keep in the mind the proposed hotel itself is 450 feet long. Picture a building 3 stories high stretching 1 1/2 football fields long. That is a lot! of building. Nothing like anything seen in HMB before. There are the technical aspects as to whether the building meets or violates codes and the subjective aspects where the planners have to determine, according to requirements laid out by the city plan, whether the building blends with the surroundings and enhances or denigrates the small town character of HMB. How far does the city bend to stray from those requirements? Is it a Hyatt? Is it a Walmart? Obviously lots of opinions on those questions in this lively discussion.

[Cid Young](#)

• Moss Beach

Mara

The hotels make money for the City with Transient Occupancy Tax!

(edited)





• • 5d

[Nancy Rapp](#)

• Ocean Colony

What's coming next a discount shopping mall. I envisioned Oceanside as you near Carmel

5 days ago

[Cid Young](#)

• Moss Beach

Nancy

I used to drive up to Santa Rosa in the Eighties and it was a pastoral drive, but the last time I went up that way, it was all huge shopping malls and glistening car dealerships from Rohnert Park to Santa Rosa.

5 days ago

[Steve Hyman](#)

• Ocean Colony

When a developer considers a project, they do a lot of research as to what's going to work best for both them and the community. Their research indicated a hotel made economic sense. Other people may want something else there but they are not paying for it. For those who want something like open space or affordable housing or canibus farms or whatever can buy the property and do their vision. I've seen these delaying tactics used here for decades. All it does is stretch out worthwhile projects the community needs and makes lawyers and environmental consultants wealthy. Wealthy developers aren't deterred by these tactics as they have the deep pockets to fight the fight for years

C-83.94
Cont.

3

5 days ago

[Cid Young](#)

• Moss Beach

Steve

C-83.94
Cont.

So true, every Developer anticipates the hoops they must jump through and also knows that each project will be approved in a vacuum, with paid-for reports that minimize the impacts, especially traffic reports that are produced from out-of-the-area firms. The main argument against this project are the impacts to views of the hills.

(edited)

9h

[Dave Kasper](#)

• Linda Mar (Pacifica)

This is a nice project

5 days ago

[Kathy Catalano](#)

• Half Moon Bay

Dave Kasper

Maybe for Pacifica, but NOT Half Moon Bay.

4 days ago

[Rick Southern](#)

• Miramar

Amazing Video Patricia! Some have commented that the hotel is inevitable. That is not true. Numbers pro or con are a very important part of the decision on this project. Express your opinions to hyatthotel@hmbcity.com.

5 days ago

[Patricia Chimienti](#)

Author

• Alsace Lorraine

The deadline for written comments is Tuesday September 13, 2022 by 5:00 PM at City Hall or via email at hyatthotel@hmbcity.com. So, this is my email and video to please be added to the official record concerning these projects.

4 days ago

[Brian Holt](#)

• Arleta Park

Patricia

C-83.94
Cont.

thank you for this reminder. It is important for everyone to submit comments - those who support the project, those who oppose, those who just have requests for additional information. It's important that decision makers don't hear from only the loudest voices.

3 days ago

[Steve Hyman](#)

• Ocean Colony

Hi CID, I drive past this site everyday. The views of the hills are just partially blocked by the roof ridge for just a few seconds at the speed limit. What the hotel does obscure is part of the fire station, the theater and Main St Housing. Hardly HMB landmarks. It's just one of the many weak excuses used to block or delay projects. 6 years is enough of a delay.

8 hr ago

[Kathy Catalano](#)

• Half Moon Bay

6-year delay? Why not forever? I have lived in HMB for a long time and I am witnessing greedy landowners, developers, and realtors ruining our lovely town with little regard for our water, sewer, and traffic considerations. Where are the employees of this proposed, ugly hotel scheduled to park their vehicles?

7 hr ago

[Steve Hyman](#)

• Ocean Colony

Why is it being greedy wanting to do something with an asset you own? Just cause you don't like the proposal, isn't a sufficient reason to stop someone else exercising their rights and dreams. If you want more open space, you can try and buy the land like the 200 acre parcel across the highway.

7 hr ago

[Steve Hyman](#)

• Ocean Colony

Well if you don't like this project on the outskirts of town, I'm sure you'll like the proposed 4 story 40 unit building on City land on Kelly Ave that's going to be permitted fast track ignoring all sorts of requirements and studies. how nice of the City to donate 12000 sf of paved parking reducing the number of spots plus creating need for many other cars from residents. Less parking and more cars. Just what Kelly Ave needs. Parking at the Hyatt isn't going to be an issue, especially like this proposal will.

6 hr ago

COMMENTS ON ANOTHER HYATT THREAD:

https://nextdoor.com/p/SM_YrFmCPD7k?view=detail&init_source=search&query=hyatt

C-83.94
Cont.

James Pendergast

• Half Moon Bay

The Hyatt complex is a bad idea in the worse location. An absolute no.

4 Aug

Susi Mickelsen

• Half Moon Bay

Bad idea in every way. No to 3 stories. Blocks the famous Johnston house view. Will be another eyesore we don't want. No, no, no !!!!

PRIVATE COMMENTS ON NEXTDOOR MESSAGES TO DAVID SCHORR. Names redacted, as these comments were not made publicly, but reflect public sentiment:

Aug 10 2022

Hi Dave, I do not like the idea of building the Hyatt. I live right in front of where they want to build it. I already struggle to find parking as it is now, I can only imagine how hard it will be to find parking if the build goes through. On top of that, we need to protect the ecosystem in that area. In general, I think it's a bad idea.

Hi Dave, I think it is yet another bad idea in a terrible location. Among other things, it is across from the fire house that we moved out of the middle of downtown to give the firemen quick and clear access to Hwy 1. I don't live near it, but the parking is already a nightmare in downtown, with the neighborhoods filling up with visitors' cars. Locals can't have company on a weekend, because there is no parking...so let's build a hotel with insufficient parking for guests and staff.

**COMMENTS ON
DRAFT ENVIRONMENTAL IMPACT REPORT
HALF MOON BAY
HYATT PLACE PROJECT (Volume I)
State Clearinghouse No. 2018032059
City File Number: PDP 072-13**

Submitted by David Schorr, Half Moon Bay homeowner, taxpayer and resident

September 13, 2022

Appendix B

- The purpose of this appendix is to rebut specific verbal public comments made at the August 9, 2022 Planning Commission Study Session for this Project, and to make these rebuttals part of the public record, whether they are specifically responsive to aspects of Draft EIR or not.
- Whether pro or con, people who take the time and effort to comment publicly to Planning Commission are making their comments primarily for the purpose of influencing the decision-making process. Differences of opinion are to be expected, and in fact welcomed, in an open process.
- However, when project supporters make statements which are unsupported, biased, or outright false, that must be called out, to correct the record, and to avoid skewing the debate, discussion, and ultimately decisions, unfairly. None of my comments following meant as personal attacks on any individual, but rather an openminded attempt to correct or clarify. My apologies in advance if anyone takes offense at my comments, none is intended.
- Responding to comments made by Mr. Holt:**
- “... when you can’t necessarily attack anything else, you go to the visual resources; you attack the aesthetics of the project. And that’s because it’s subjective. One person’s impact is another person’s visual benefit.”
- I think it’s fair to acknowledge that the focus of opponents to this project on visual resources is indeed the most commonly heard complaint, and that is because that is a very obvious impact from a very large project, and the easiest parameter/impact to get one’s head around, as compared to more arcane evaluations of traffic as mandated by CEQA/Caltrans, emissions calculations, etc.. The size, scale, height, and length of the proposed development is what has people concerned/upset.
- Specifically, Mr. Holt states that commenting on aesthetics is a subjective exercise. This is a point which requires clarification and rebuttal. A subjective judgment is, “Is the blue shirt nicer than the red shirt?”, or “Is Coke better than Pepsi?”. Similarly, if we were restricting our comments solely to the color palette of the proposed hotel, then yes, that would be a primarily subjective situation/decision/opinion.
- However, as it applies to the hotel (and proposed associated housing) project, in the Draft EIR section titled Aesthetics, CEQA requires consideration of items such as Regulatory Setting. And in looking at Regulatory Setting, one is referred to specific passages of City Code and the Coastal Commission-certified Local Coastal Land Use Plan (LCLUP). Both the overarching intent and specific language working hand in glove, of the many code and policy sections at play here give Staff and Planning Commissioners specific and objective tools as a lens through which they can evaluate this or any project.

C-83.99 For example, the simple question of does the mass of the proposed project block views of currently visible inland hillsides and open slopes? This is not a value judgment, that is not a subjective criteria for decision. This is a simple yes or no, to be based on factual observation. But, as noted in the body of my comments, the answer yes or no does depend on the vantage point from which the project is viewed, but that itself is a matter of procedure, which is laid out more objectively than subjectively in relevant code and policies. Note that code and policy require protection of ANY views of the inland hills, so the project is inconsistent with those requirements, and that is an objective fact, not a subjective opinion.

In summary of response to Mr. Holt, I believe that my comments regarding this project and the comments of many others are based on objective, evenhanded interpretation of relevant code and policy, rather than subjective factors.

Responding to comments made by Mr. Mercurio:

"I think some of your traffic problems will go away with those of us that do visit and who are going to stay there" I observe that Commissioner Ruddock nods his head in agreement to this statement.

C-83.100 The Draft EIR clearly states an estimate of 572-575 additional vehicle trips per day as result of the hotel project or Alternative 2 developed. Mr. Mercurio is echoing a marketing argument made by the Applicant as far back as 2017 or 2018. It presumes that people will drive to the hotel and stop using their cars, rather than driving out on separate trips to the beach, shopping, dinner, etc. Commissioner Benjamin also pointed out that the conclusion stated in the Draft of slightly reduced traffic under certain conditions at certain locations could simply be an artefact of the analysis used. I'm disappointed to see that this argument still has traction, as it really doesn't make sense.

And as noted on page 30 in the body of my Comments on the Draft EIR, Table 4.15-12, page 4.15-39, page 409 PDF, data presented by the authors of the Draft EIR does not show any decrease in traffic in any of the road segments studied, during any of the time frames studied.

Responding to comments made by Mr. McGregor:

C-83.101 As others have done, Mr. McGregor views changes in the project from its original presentation six years ago as reason to approve it now. However, his comments also implicitly acknowledge that the project will block views of the inland hills, "gave a little bit more of a view towards the hills etc.", rather that this current iteration blocks less of the protected viewshed. However code and policy language is explicit regarding more stringent levels of protection for the viewshed. Mr. McGregor echoes the comments of the Applicant and Mr. Mercurio in positing a decrease in traffic as a result of the hotel being built. In addition to the previously mentioned problems with this hypothesis, one must consider in the overall context that the explicit purpose of building a new commercial development is to attract new customers to the development and the area in general. These goals are clearly at odds with the contention that more development will equal less traffic.

And as noted on page 30 in the body of my Comments on the Draft EIR, Table 4.15-12, page 4.15-39, page 409 PDF, data presented by the authors of the Draft EIR does not show any decrease in traffic in any of the road segments studied, during any of the time frames studied.

Responding to comments made by Mr. Salume:

Mr. Salume opens his remarks by stating that ever-increasing visitor traffic to our community is jamming up the roads on Highway 92 and to the north of Highway 92. He then states "We do not

have huge traffic jams south of town. I think the best way to address our chronic visitor traffic globally is to look for ways to draw more of it to the south of 92 with appropriate visitor-serving projects, like this one. This project is the right kind of project, in the right location to serve the long-term planning needs of the town.”

C-83.102 This statement that we do not have huge traffic jams south of town is false. Referring to baseline period of 2018, even on weekdays, anytime from 3 PM when school got out, frequently until 7:30 PM or later, transiting northbound from the south end of town past 92 was an extremely painful experience. I had more than a few days myself when it took 30 minutes or more to go from south of Kelly Avenue to Kehoe Avenue. This was a routine situation pre-pandemic. Weekend out bound traffic would often not clear until 8 PM, with three or more hours of solid gridlock at 92, 1, and Main, from both south and northbound directions heading towards 92. As other speakers noted, backups well south of the fire station were common in the 2018 baseline period of time, especially on weekend evenings. So, the assertion that we do not have or did not have large traffic problems in the southern end of town is simply incorrect.

C-83.103 It is relevant and necessary to point out that Mr. Salume has for some number of years been working towards, and advocating for converting one of the greenhouse properties south of Camerons, on the west side of Highway 1, into a visitor serving RV Park. I do not believe he currently has an active project in front of planning, but I do know it has been discussed extensively by this speaker as one of his development goals. With that in mind, we have a better understanding of the language used in his comments, as anything that facilitates development south of the fire station would potentially be of financial benefit to Mr. Salume.

Responding to comments made by Mr. Hooker:

C-83.104 “In my opinion, the view in question is already largely blocked by two rows of street trees which were required by the city there on both sides of Main Street, and by the theater, and by the two-story affordable housing along Main Street.” Mr. Hooker continues that he walked up and down the median of the highway in that vicinity to evaluate the views for himself some time ago, and stated “they are already VERY limited by existing buildings and trees.” “Views should not be considered in the abstract; the real views of the upland hills should be checked out. They are not significantly impacted further by this project.”

I fully agree with Mr. Hooker that on-site observation is much better than thumbnail photographs embedded within a document. The natural process of taking in a scenic vista is very different than a static snapshot. The opinion from Mr. Hooker that the views are already heavily impacted and would not be further impacted by the addition of the hotel project is the one that we have heard from him before, in his capacity as an AAC member. He is implying and/or stating that the views of the inland hills are already blocked, completely or in large part, to the extent that the hotel at the massing proposed would not further impact views.

I, too, have walked the highway and trail in the area of the proposed project and while he and I are looking at the same views, we have different opinions as to current level of impact, and potential additional impact.

As a point of academic discussion, if we accept Mr. Hooker’s statement that existing streetscape, landscaping, and structures has substantially impaired and degraded the viewshed, then one must ask whether or not those developments were appropriately approved or not. I’m unaware of the

- C-83.104
Cont. timeframe of those developments and the regulatory setting applicable at that time, so I can't answer that question. However, if one accepts (although I personally do not) Mr. Hooker's contention that the view of the inland hills and slopes is substantially degraded, does that justify further degradation of the remaining views by placing a very large, very tall, and very long structure across the predominant location from which these views are appreciated. That as well, is apparently a subject of some debate. This actually has some relevance to a comment by Commissioner Hernandez, where he noted 13 separate intrusions into the views of the inland hills from various points along Highway 1 south of 92. I would be disappointed if past decisions and projects which impaired protected views were used as precedent for yet another project which would further diminish those protected views.
- C-83.105 Perhaps oddly, having just stated that photographs in a document are often quite inadequate in replicating the experience of standing in a place, to adequately respond to the statements and judgements made by Mr. Hooker, for better or worse, I need to include photos as Appendix D to these comments which were taken August 23, 2022, with the views of the hills delineated, as well as the outlines and borders of the story poles and flagging superimposed thereon.
- C-83.106 From my evaluation of these photos, the views of the inland hills and upland slopes are at this point in time largely intact (contrary to Mr. Hooker's statements of his impression of these views), and would be substantially degraded by looking by superimposing the profile of the proposed hotel rooms as represented by current story poles. Such degradation of viewshed is clearly impermissible according to many sections of City Code and Policy previously cited in the body of my comments. It must be added that these comments do not even take into consideration additional viewshed impacts from the proposed townhome development to the north of the hotel room buildings. This points to another notable deficiency in the Draft EIR.
- C-83.106 In summary, it appears that Mr. Hooker and I have differing opinions as to the current status of the viewshed, and potential impact upon whatever the current status of the viewshed may in reality be. I am hopeful that by presenting some photos, I can move this discussion or disagreement more towards the objective, and away from the subjective. I consider my evaluation of the photos in the Appendix D to be objective in their appraisal of both existing site conditions as well as impact of the proposed project hotel rooms as represented by the story poles. Note that none of these photos address visual impact issues of the townhome development to the north of dealership, which must be included in analysis of visual impacts.

END OF APPENDIX B

STATE OF CALIFORNIA—NATURAL RESOURCES AGENCY

EDMUND G. BROWN JR., GOVERNOR

CALIFORNIA COASTAL COMMISSION

NORTH CENTRAL COAST DISTRICT OFFICE
45 FREMONT STREET, SUITE 2000
SAN FRANCISCO, CA 94105
PHONE: (415) 904-5260
FAX: (415) 904-5400
WEB: WWW.COASTAL.CA.GOV



Th22a

Appeal Filed: 5/20/2016
49th Day: Waived
Staff: P.Foster - SF
Staff Report: 7/28/2016
Hearing Date: 8/11/2016

APPEAL STAFF REPORT SUBSTANTIAL ISSUE DETERMINATION

Appeal Number: A-2-HMB-16-0058

Applicant: Coastside Fire Protection District

Appellant: Citizens for Preserving Rural Half Moon Bay

Local Decision: Approved with conditions by the Half Moon Bay City Council (CDP Application Number PDP-15-046)

Project Location: 1191 Main Street, Half Moon Bay, San Mateo County (APN: 064-370-050)

Project Description: Construction of a prefabricated fire training tower approximately 45 feet in height and 4,497 square feet in floor area on an 86,463 square foot lot developed with an existing fire station and fire training yard.

Staff Recommendation: No Substantial Issue

Important Hearing Procedure Note: This is a substantial issue only hearing. Testimony will be taken only on the question of whether the appeal raises a substantial issue. Generally and at the discretion of the Chair, testimony is limited to 3 minutes total per side. Please plan your testimony accordingly. Only the applicant, persons who opposed the application before the local government (or their representatives), and the local government shall be qualified to testify. Others may submit comments in writing. If the Commission determines that the appeal does raise a substantial issue, the de novo phase of the hearing will occur at a future Commission meeting, during which it will take public testimony.

A-2-HMB-16-0058 (Coastside FPD Tower)**SUMMARY OF STAFF RECOMMENDATION**

The Half Moon Bay City Council approved a coastal development permit (CDP) to allow for the construction of a new four-story prefabricated fire training tower, approximately 45 feet in height and 4,497 square feet in floor area, on a lot previously developed with an existing fire station and fire training yard, just east of Highway 1, on the southwest corner of Main Street and Higgins Canyon Road.

The Appellant contends that the City-approved project would visually degrade the City's southern gateway based on lack of conformance with the visual resource policies and standards of the City's Local Coastal Program (LCP), which require protection of scenic and visual qualities of coastal areas, including the City's eastern hillsides and ridgelines.

After reviewing the local record, Commission staff recommends that the Commission find that the City's CDP action does not raise a substantial issue with respect to the City-approved project's conformance with the Half Moon Bay LCP. Although the City's action raises some questions regarding its consistency with LCP visual policies, staff does not believe that the approved development results in significant visual resource problems. The project would result in a fairly large structure inland of the highway, but its effect on public views is tempered by the presence of the existing fairly large fire station and surrounding development, and the screening provided by existing vegetation along Main Street. Staff believes that the intent of the LCP policies in this regard is adequately respected by the City's action in this case, and that the development can be found visually compatible with the character of the viewshed at this location.

As a result, staff recommends that the Commission determine that the appeal contentions do not raise a substantial issue with respect to the grounds on which the appeal has been filed, and that the Commission decline to take jurisdiction over the CDP for this project. The single motion necessary to implement this recommendation is found on page 4 below.

A-2-HMB-16-0058 (Coastside FPD Tower)

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EXHIBITS

Exhibit 1 – Project Location Map

Exhibit 2 – Approved Project Design

Exhibit 3 – Approved Project Renderings

Exhibit 4 – City’s Final Local Action Notice

Exhibit 5 – Appeal of Half Moon Bay’s CDP Approval

Exhibit 6 – City’s Final Approving Resolution (No. C-2016-34)

Exhibit 7 – Still Images from Applicant’s Simulation Video

Exhibit 8 – Correspondence

A-2-HMB-16-0058 (Coastside FPD Tower)**I. MOTION AND RESOLUTION**

Staff recommends that the Commission determine that **no substantial issue** exists with respect to the grounds on which the appeal was filed. A finding of no substantial issue would mean that the Commission will not hear the application de novo and that the local action will become final and effective. To implement this recommendation, staff recommends a **YES** vote on the following motion. Passage of this motion will result in a finding of No Substantial Issue and the local action will become final and effective. The motion passes only by affirmative vote of a majority of the Commissioners present.

***Motion:** I move that the Commission determine that Appeal Number A-2-HMB-16-0058 raises **no substantial issue** with respect to the grounds on which the appeal has been filed under Section 30603, and I recommend a **yes** vote.*

***Resolution:** The Commission finds that Appeal Number A-2-HMB-16-0058 does not present a substantial issue with respect to the grounds on which the appeal has been filed under Section 30603 of the Coastal Act regarding consistency with the certified Local Coastal Program and/or the public access and recreation policies of the Coastal Act.*

II. FINDINGS AND DECLARATIONS

The Commission finds and declares as follows:

A. PROJECT LOCATION AND DESCRIPTION

The proposed project is a new four-story prefabricated fire training tower, which would be approximately 45 feet in height and 4,497 square feet in floor area, on an 86,463 square foot lot previously developed with an existing fire station and fire training yard. The subject property is located at 1191 Main Street in Half Moon Bay, just east of Highway 1, on the southwest corner of Main Street and Higgins Canyon Road (**Exhibit 1**).

As depicted in the project plans (**Exhibit 2**), the training tower is to be located north of the existing fire station, and set back in the northeast corner of the property in the area of the site currently used as a fire training yard. The tower consists of four enclosed but unconditioned floors, topped by an open training platform. The City-approved structure is 45 feet at its highest point, the top of the stairwell railing, and 40.5 feet to the top of the enclosed portion of the structure. The top floor training platform is designed as a "clear story" with no roof and an open railing instead of a solid parapet. No exterior lighting is included on the building. Small signs are included on doors and walls for field location purposes.

The exterior finish will include brick combined with painted metal siding, including muted red brick on the front facade facing Main Street, metal siding painted tan on the sides, and dark brown trim (**Exhibit 3**).

The Applicant indicates that the purpose of the project, including the tower's design, is to provide a variety of training opportunities for firefighters under realistic and emergent circumstances. The tower includes doors, windows, stairwells, balconies, roof areas, and interior

A-2-HMB-16-0058 (Coastside FPD Tower)

spaces that simulate building conditions firefighters encounter in actual emergency situations, including multi-story building rescue scenarios. In addition, the facility provides fire hose connections, burn rooms/areas, a theatrical smoke distribution system, rappelling anchors, moveable interior wall partitions, and operable shutters that facilitate a variety of training activities, as well as a fan to dissipate smoke from burn rooms.

The approved construction site is located within the LCP's Public Service (P-S) zoning district on land designated in the LUP as Public Facilities and Institutions. The LUP designation is intended to provide for educational, governmental and institutional uses not feasibly accommodated in the general commercial area, and supports such uses as schools, public works and utility yards, maintenance buildings, fire stations, and hospitals. Surrounding uses at the site include a non-profit repertory theatre to the north, agricultural land to the east and south, and an undeveloped lot to the west of Main Street fronting Highway 1 (i.e., between Main Street and Highway 1). The site itself is approximately 100 yards inland from Highway 1, and is thereby situated within a scenic corridor, designated by both LUP Policy 7-1 and Implementation Plan (IP) Section 18.37.020(A)(1) as extending for 200 yards on either side of the Highway. In addition, inland hillsides lie eastward of the site, which are identified as both an important visual resource and major attribute of the City's setting by IP Section 18.01.010(G) and the LCP's Upland Slopes discussion.

Half Moon Bay CDP Approval

On May 3, 2016, the City of Half Moon Bay City Council approved coastal development permit (CDP) PDP-15-046 for the above-described project. The City's notice of final local action was received in the Coastal Commission's North Central Coast District office on May 6, 2016 (**Exhibit 4**). The Coastal Commission's ten-working day appeal period for this action began on May 9, 2016 and concluded at 5 p.m. on May 20, 2016. One valid appeal, from Citizens for Preserving Rural Half Moon Bay, was timely received (see below and see **Exhibit 5**).

B. APPEAL PROCEDURES

Coastal Act Section 30603 provides for the appeal to the Coastal Commission of certain CDP decisions in jurisdictions with certified LCPs. The following categories of local CDP decisions are appealable: (a) approval of CDPs for development that is located (1) between the sea and the first public road paralleling the sea or within 300 feet of the inland extent of any beach or of the mean high tide line of the sea where there is no beach, whichever is the greater distance, (2) on tidelands, submerged lands, public trust lands, within 100 feet of any wetland, estuary, or stream, or within 300 feet of the top of the seaward face of any coastal bluff, and (3) in a sensitive coastal resource area if the allegation on appeal is that the development is not in conformity with the implementing actions of the certified LCP; or (b) for counties, approval of CDPs for development that is not designated as the principal permitted use under the LCP. In addition, any local action (approval or denial) on a CDP for a major public works project (including a publicly financed recreational facility and/or a special district development) or an energy facility is appealable to the Commission. The City's approval is appealable because the approved development constitutes a major public works project.

The grounds for appeal under Section 30603 are limited to allegations that the development does not conform to the certified LCP or to the public access policies of the Coastal Act. Section

A-2-HMB-16-0058 (Coastside FPD Tower)

30625(b) of the Coastal Act requires the Commission to conduct a de novo CDP hearing on an appealed project unless a majority of the Commission finds that “no substantial issue” is raised by such allegations. Under Section 30604(b), if the Commission conducts a de novo hearing and ultimately approves a CDP for a project, the Commission must find that the approved development is in conformity with the certified LCP. If a CDP is approved for a project that is located between the nearest public road and the sea or the shoreline of any body of water located within the coastal zone, Section 30604(c) also requires an additional specific finding that the development is in conformity with the public access and recreation policies of Chapter 3 of the Coastal Act. This project is not located between the nearest public road and the sea, and thus the additional public access and recreation finding is not needed if the Commission were to approve a project following a de novo hearing.

The only persons qualified to testify before the Commission on the substantial issue question are the Applicant, persons who made their views known before the local government (or their representatives), and the local government. Testimony from other persons regarding substantial issue must be submitted in writing. Any person may testify during the de novo CDP determination stage of an appeal.

C. SUMMARY OF APPEAL CONTENTIONS

The Appellant group, Citizens for Preserving Rural Half Moon Bay, contends that the City-approved project would visually degrade scenic views of the City’s eastern hills as seen from Highway 1 based on lack of conformance with LCP visual resource policies and standards, including LCP IP Chapter 18.37 that details standards relating to protection of scenic and visual qualities of the City’s coastal areas. Please see **Exhibit 5** for the full appeal document.

D. SUBSTANTIAL ISSUE DETERMINATION

The term “substantial issue” is not defined in the Coastal Act or in its implementing regulations. In previous decisions on appeals, the Commission has generally been guided by the following factors in making substantial issue determinations: the degree of factual and legal support for the local government’s decision; the extent and scope of the development as approved or denied by the local government; the significance of the coastal resources affected by the decision; the precedential value of the local government’s decision for future interpretations of its LCP; and, whether the appeal raises only local issues as opposed to those of regional or statewide significance. Even when the Commission chooses not to hear an appeal, appellants nevertheless may obtain judicial review of a local government’s CDP decision by filing a petition for a writ of mandate pursuant to the Code of Civil Procedure, Section 1094.5.

In this case, and for the reasons discussed further below, the Commission exercises its discretion and determines that the development approved by the City does not raise a substantial issue with regard to the Appellant’s contentions.

Visual Impacts***Applicable Policies***

The LUP includes a series of policies designed to protect the City’s scenic qualities, including with respect to the hillsides along the City’s eastern boundary, and require structures to be designed and sited to follow the natural landscape without intruding into the skyline. These

A-2-HMB-16-0058 (Coastside FPD Tower)

policies also designate as a scenic corridor areas within at least 200 yards of Highway 1 on either side. Applicable policies include:

LUP Chapter 7 (pg. 90) – Upland Slopes

The hillside along the City's eastern boundary is a major attribute of the City's setting. Coordinated County and City measures to protect the scenic quality of these hillsides are necessary... Any new development should be sited and designed to maintain the natural character of the landscape and to avoid substantial cuts and fills.

LUP Policy 7-1

The City will establish regulations to protect the scenic corridor of Highway 1, including setbacks for new development, screening of commercial parking, and landscaping in new developments. The City will establish and map scenic corridors for Highway 1 to guide application of the policies of this chapter. Minimum standards shall include all areas within 200 yards of State Highway 1 which are visible from the road.

LUP Policy 7-10

New development on upland slopes visible from Highway 1 and Highway 92 as indicated on the Visual Resources Overlay Map, shall not involve grading or building siting which results in a significant modification of the hillslope; where trees must be removed for building purposes, reforestation shall be provided as a part of any new development to maintain the forested appearance of the hillside. Structures shall be subordinate in appearance to the natural landform, shall be designed to follow the natural contours of the landscape, and shall be sited so as not to intrude into the skyline as seen from public viewing places.

The following IP provisions, specifically cited by the Appellant, require that permitted structures remain visually compatible with the character of the surrounding area, while conserving and enhancing important visual resources, including the scenic and visual qualities of coastal areas, by not intruding or projecting above the ridgeline of hillsides at the eastern edge of the City, as seen from Highway 1:

IP Section 18.01.010 – Purpose and Intent

More specifically the zoning ordinance is intended to:

- (G) *Conserve and enhance important visual resources within the city, including...views of the inland hillsides at the eastern edge of the city.*

IP Section 18.37.010 – Purpose and Intent

The specific purpose and intent of these visual resource protection standards are to:

- (A) *Protect the scenic and visual qualities of coastal areas as a resource of public importance.*
- (E) *Allow development only when it is visually compatible with the character of the surrounding areas.*

IP Section 18.37.035 – Upland Slopes Standards

New development shall meet the following criteria:

A-2-HMB-16-0058 (Coastside FPD Tower)

- (C) *Structures shall be sited so as to not intrude or project above the ridge line skyline as seen from Highways One and 92.*

In addition, the following IP visual resource provisions also apply:

IP Section 18.37.020 – Visual Resource Areas

The community development director shall prepare and maintain maps of all designated visual resource areas within the city, based upon the visual resources overlay map contained in the city's local coastal program land use plan. Visual resource areas within the city are defined as follows:

- (A) *Scenic Corridors. Visual resource areas along the Highway One corridor and scenic beach access routes, defined as follows: (1) Highway One Corridor. Located on both sides of Highway One, for a distance of two hundred yards in those areas where Highway One is designated as a scenic highway by the state of California and in those areas shown on the visual resources overlay map in the city's local coastal program land use plan. ...*
- (B) *Upland Slopes. Scenic hillsides which are visible from Highway One and Highway 92, as indicated on the visual resources overlay map. These areas occur include hillside areas above the one hundred sixty foot elevation contour line which are located: (1) East of the proposed Foothill Boulevard, comprising portions of Carter Hill and Dykstra Ranch properties. (2) Southeast of Pilarcitos Creek and east of Arroyo Leon, comprising a portion of land designated as open space reserve in the land use plan. (3) East of the Sea Haven Subdivision, being a portion of the Gravance property designated urban reserve in the land use plan. (4) East of the Nurseryman's Exchange properties and lower Hester-Miguel lands, comprising all of the upper Hester-Miguel lands designated as open space reserve in the land use plan. ...*

IP Section 18.37.030 – Scenic Corridor Standards

Public views within and from scenic corridors shall be protected and enhanced, according to the following standards: ...

- (A)(3) *Within the mapped area of the visual resources overlay map, building height shall not exceed one story or fifteen feet, unless an increase in height would not obstruct public views to the ocean from the highway or would facilitate clustering of development which would result in greater view protection. The building height may be increased upon approval by the planning commission, if findings are made that greater view protection will result or public views will not be obstructed, but in no case shall building height exceed a height of twenty-eight feet.*
- (B) *Development within the Highway One corridor ...In general, structures shall be:*
- (1) *Situated and designed to protect any views of the ocean and scenic coastal areas. Where appropriate and feasible, the site plan shall restore and enhance the scenic quality of visually degraded areas.*
- (2) *Located where least visible from the public view. Development shall not block views of the shoreline from scenic road turnouts, rest stops or vista points.*

A-2-HMB-16-0058 (Coastside FPD Tower)

...the structure's lot coverage, at approximately 1,875 square feet, is less than 6% of the total area of the site...The visual effect of the additional height is moderated by the building's small size; its greater massing at the ground level; by the building location, which is set back 138 feet from Main Street, 135 feet from the theater, and 130 feet from Fire Station 40.²

In addition, the City explained the tower would blend with the varying architectural styles of buildings in the vicinity of the project site because its industrial look would not contrast abruptly with the existing fire station or the adjacent theater building to the north (housed in a re-purposed industrial building), and the site design “is consistent with the existing pattern along Main Street where buildings are interspersed with open parking areas and street trees block views at regular intervals” (**Exhibit 4**, pp. 10, 15). Thus, the City made findings based on the fairly broad purpose and intent of the IP.

However, the City did not analyze other more objective visual standards established in the IP and LUP as discussed above, because it found that IP Section 18.37.035 and related provisions of the LUP, such as Policy 7-10, only apply to “upland slopes” areas, which the City asserted do not describe the subject site. Specifically at issue is the requirement that new development be sited so as to not intrude or project above the City’s eastern ridgeline as seen from Highway 1 (see IP Section 18.37.035(C)). IP Section 18.37.020(B) identifies upland slopes as scenic hillsides visible from Highway 1 and 92, “as indicated on the visual resources overlay map”, including “hillside areas above the one hundred sixty foot elevation contour line”. LUP Policy 7-10 is a little broader in terms of ridgeline question, stating that “structures shall be subordinate in appearance to the natural landform, shall be designed to follow the natural contours of the landscape, and **shall be sited so as not to intrude into the skyline as seen from public viewing places**” (emphasis added).

Although the City-approved project is not located on an upland slope, that does not mean that the ridgeline protection policies don’t apply. Indeed, the LCP intent is to protect the views of the eastern hillsides, including avoiding development that projects above the ridgeline (see, for example, LUP Policy 7-10 and IP Section 18.01.010(G) cited above). In addition, the LCP makes clear that the area within 200 yards of Highway 1 is a scenic corridor to which specific requirements adhere. The City has taken the position, however, that these requirements only apply if the area is mapped on the visual resources map. Such interpretation is not adequately protective of visual resources, however.

LCP Policy 7-1 states that “The City will establish and map scenic corridors for Highway 1 to guide application of the policies of this chapter. Minimum standards shall include all areas within 200 yards of State Highway 1 which are visible from the road.” The clear intent of such policy is that, at a minimum, any mapping program needs to take into account the area within 200 yards of Highway 1. However, the current visual resource area map does not show the 200 yard area, for some reason. Notwithstanding this omission, it is clear the LCP intent is to protect this area, mapped or not. Indeed, the use of “shall” in the last sentence clearly establishes intent to protect the scenic qualities of this corridor. Furthermore, IP Section 18.37.020(A)(1) defines

² See Exhibit 6, Resolution No. C-2016-34, Exhibit A.

A-2-HMB-16-0058 (Coastside FPD Tower)

(5) Designed to maintain a low height above natural grade, unless a greater height would not obstruct public views.

Analysis

The Appellant contends the City-approved development does not adequately protect public views consistent with the LCP, including specifically that it fails to protect scenic views of the eastern hills because the 45-foot fire training tower will project above the ridgeline as seen from Highway 1. The LUP's Upland Slopes section (in LUP Chapter 7) recognizes the hillsides along the City's eastern boundary as a "major attribute of the City's setting," and indicates the need for development to be "sited and designed to maintain the natural character of the landscape." In addition, LUP Policy 7-1 requires the City to establish regulations to protect the scenic corridor of Highway 1, including all areas within 200 yards of the Highway, in order to guide application of the visual resource policies contained in Chapter 7 of the LCP. Finally, LUP Policy 7-10 requires structures to be subordinate in appearance to the natural landform, designed to follow the natural contours of the landscape, and sited so as not to intrude into the skyline as seen from public viewing places.

The IP clearly intends to protect the scenic and visual qualities of coastal areas, allow development only when it is visually compatible with the character of the surrounding areas, and conserve and enhance important visual resources within the City, including views of the inland hillsides at the eastern edge of the city as expressed by IP Sections 18.01.010(G) and 18.37.010(A) and (E), cited above. Specifically regarding development in upland slopes areas, IP Section 18.37.035(C) requires that new development be sited so as to not intrude or project above the ridge line skyline as seen from Highways 1 and 92. With respect to development within scenic corridors, including 200 yards on either side of Highway 1, the IP requires development to remain at or below twenty-eight feet in height (subject to specific findings), protect any views of scenic coastal areas, be located where least visible from the public view, and be designed to maintain a low height above natural grade (see IP Sections 18.37.030(A)(3) and (B)(1), (2) and (5) above).

The City determined that the project is consistent with all applicable policies and development standards of the LCP. With regard to the overall stated purpose and intent of the IP, the City found that the fire tower adequately conserved views of the eastern hillside, as required by Section 18.01.010(G), despite being visible from Highway 1, because it:

is not expected to be visually intrusive or significantly obstruct views of the hillsides due to the structure's relatively small size, its distance from the Highway, the lot's remaining open area, the screening provided by existing street trees on either side of Main Street, and the effective use of materials and color which blends with the background.¹

In terms of the stated purpose and intent of the IP's visual resource protection standards, the City determined the development would protect the scenic and visual qualities of the area and would be visually compatible with the character of the surrounding area, as required by IP Sections 18.37.010(A) and (E). The City states:

¹ See Exhibit 6, Resolution No. C-2016-34, Exhibit A.

A-2-HMB-16-0058 (Coastside FPD Tower)

...the structure's lot coverage, at approximately 1,875 square feet, is less than 6% of the total area of the site...The visual effect of the additional height is moderated by the building's small size; its greater massing at the ground level; by the building location, which is set back 138 feet from Main Street, 135 feet from the theater, and 130 feet from Fire Station 40.²

In addition, the City explained the tower would blend with the varying architectural styles of buildings in the vicinity of the project site because its industrial look would not contrast abruptly with the existing fire station or the adjacent theater building to the north (housed in a re-purposed industrial building), and the site design “is consistent with the existing pattern along Main Street where buildings are interspersed with open parking areas and street trees block views at regular intervals” (**Exhibit 4**, pp. 10, 15). Thus, the City made findings based on the fairly broad purpose and intent of the IP.

However, the City did not analyze other more objective visual standards established in the IP and LUP as discussed above, because it found that IP Section 18.37.035 and related provisions of the LUP, such as Policy 7-10, only apply to “upland slopes” areas, which the City asserted do not describe the subject site. Specifically at issue is the requirement that new development be sited so as to not intrude or project above the City’s eastern ridgeline as seen from Highway 1 (see IP Section 18.37.035(C)). IP Section 18.37.020(B) identifies upland slopes as scenic hillsides visible from Highway 1 and 92, “as indicated on the visual resources overlay map”, including “hillside areas above the one hundred sixty foot elevation contour line”. LUP Policy 7-10 is a little broader in terms of ridgeline question, stating that “structures shall be subordinate in appearance to the natural landform, shall be designed to follow the natural contours of the landscape, and **shall be sited so as not to intrude into the skyline as seen from public viewing places**” (emphasis added).

Although the City-approved project is not located on an upland slope, that does not mean that the ridgeline protection policies don’t apply. Indeed, the LCP intent is to protect the views of the eastern hillsides, including avoiding development that projects above the ridgeline (see, for example, LUP Policy 7-10 and IP Section 18.01.010(G) cited above). In addition, the LCP makes clear that the area within 200 yards of Highway 1 is a scenic corridor to which specific requirements adhere. The City has taken the position, however, that these requirements only apply if the area is mapped on the visual resources map. Such interpretation is not adequately protective of visual resources, however.

LCP Policy 7-1 states that “The City will establish and map scenic corridors for Highway 1 to guide application of the policies of this chapter. Minimum standards shall include all areas within 200 yards of State Highway 1 which are visible from the road.” The clear intent of such policy is that, at a minimum, any mapping program needs to take into account the area within 200 yards of Highway 1. However, the current visual resource area map does not show the 200 yard area, for some reason. Notwithstanding this omission, it is clear the LCP intent is to protect this area, mapped or not. Indeed, the use of “shall” in the last sentence clearly establishes intent to protect the scenic qualities of this corridor. Furthermore, IP Section 18.37.020(A)(1) defines

² See Exhibit 6, Resolution No. C-2016-34, Exhibit A.

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the Highway 1 corridor as a visual resource area for a distance of 200 yards on both sides of the Highway.

In its final resolution, the City acknowledges that the subject site is located within 200 yards of Highway 1, therefore requiring the application of LCP Policy 7-10, which states in the second sentence that “[s]tructures shall be subordinate in appearance to the natural landform, shall be designed to follow natural contours of the landscape, and shall be sited so as not to intrude into the skyline as seen from public viewing places.” This is appropriate as the LCP intent is clear in that it means to protect the scenic quality of the hillsides along the City’s eastern boundary, and it would be inappropriate (and not protective of this resource) to try to imply only certain such views are protected, and others not, because of mapping inadequacies.

With respect to the Highway 1 corridor protections, the LCP has a variety of requirements that affect the proposed project, including that development shall remain at or below twenty-eight feet in height, shall not interfere with any views of scenic coastal areas, shall be located where least visible from the public view, and shall be designed to maintain a low height above natural grade (see IP Sections 18.37.030 (A)(3) and (B)(1), (2) and (5)). Ultimately, when read in conjunction, LCP Chapter 7 and the IP consistently describe an overall LCP intent to protect Highway 1 corridor and ridgeline vistas, including the Highway 1 scenic corridor (at least 200 yards out from the edge on either side of Highway 1) and the City’s eastern hills, thus requiring an analysis of the City-approved project’s consistency with all relevant provisions, including all those that refer to visual concerns related to the inland ridgelines and Highway 1 views.

According to a video provided by the Applicant which simulates the visual impact of the City-approved development with a 43-foot crane erected onsite, as viewed from north and southbound lanes of Highway 1, it appears that the 45-foot fire tower will not only be visible from Highway 1, but will also momentarily protrude into the ridgeline view from Highway 1 as travelers look east of the City toward the hillside (**Exhibit 7**). Therefore, the approved project is inconsistent with the standards set forth in LCP Policy 7-10 and IP Section 18.37.035(C), both of which require structures to be sited so as not to intrude into, or project above the eastern ridgeline as seen from Highway 1. However, in the southbound view from Highway 1 demonstrated in the Applicant’s video, the 43-foot crane remains entirely below the ridgeline, without intruding above it (see **Exhibit 7**, page 2). It is also important to note the final approved design of the fire tower only has solid walls up to 40.5 feet, with a clear top story and railing up to 45 feet, further ensuring the tower will remain beneath the ridgeline from this perspective.

Further, the existing fire station often appears to be higher than the proposed fire tower relative to the eastern ridgeline as seen from various viewpoints along Highway 1. Utilizing the Applicant’s video demonstration, from a northbound perspective the view of the crane is initially blocked by the on-site fire station itself because the tower is setback in the rear northeast corner of the property, 138 feet from Main Street (see **Exhibit 7**, page 3). Once past the fire station, the crane breaks the ridgeline looking east from Highway 1, but at this point a northbound passenger would likely only notice the tower in their peripheral vision (see **Exhibit 7**, page 4). Additionally, Highway 1 does not serve as a common path for coastal hikers, so visual intrusions into the ridgeline from the standpoint of a person walking alongside the highway is not a significant concern in that respect. Consequently, although this development will obstruct some limited existing views to the eastern ridgeline from Highway 1, it does so only in a fleeting

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manner for drivers headed north along the freeway, and will remain subordinate to the ridgeline for southbound drivers.

In essence then, the City-approved project is technically inconsistent with the ridgeline view protection policies and some of the Highway 1 corridor protection policies. However, the inconsistency is not substantial, and the impact to visual resources is fairly minimal in this case, and is compatible with the character of the surrounding development. In terms of Highway 1 views in general, the project would result in a fairly large structure inland of the highway, but its effect on public views is tempered by the presence of the existing fairly large fire station and surrounding development, and the screening provided by existing vegetation along Main Street. As such, again, while technically inconsistent with LCP Highway 1 corridor policies, the intent of the LCP policies in this regard is adequately respected by the City's action in this case, and the development can be found visually compatible with the character of the viewshed at this location.

E. CONCLUSION

When considering a project that has been appealed to it, the Commission must first determine whether the appeal of the approved development raises a substantial issue of LCP conformity, such that the Commission should assert jurisdiction over a de novo CDP for such development. As described above, the Commission has been guided in its decision of whether the issues raised in a given case are "substantial" by the following five factors: the degree of factual and legal support for the local government's decision; the extent and scope of the development as approved or denied by the local government; the significance of the coastal resources affected by the decision; the precedential value of the local government's decision for future interpretations of its LCP; and, whether the appeal raises only local issues as opposed to those of regional or statewide significance. In this case, these five factors, considered together, support a conclusion that this project does not raise a substantial issue of LCP conformance.

First, the City provided sufficient factual and legal support for its decision. As described above, the appeal contentions relate to the project's consistency with various policies of the City's certified LUP and Zoning Code. The City's approval appropriately considers general visual resource requirements and the approved project's conditions are designed to ensure consistency with these provisions. Although the City did not adequately analyze visual intrusions into the eastern ridgeline or policies that generally apply to the named 200 yards out from Highway 1 scenic corridor, their analysis on the matter was thorough, and the ultimate visual impacts affecting these protected areas will not be substantial. Thus, there is adequate factual and legal support for the City's decision.

Second, the extent and scope of the approved development is fairly minor. Although a fairly large structure, the approved project fits the scope and size of surrounding development in the vicinity of the project site. The project will remain visually compatible with the adjacent theatre and fire station and adds training capacity to an existing fire station in a Public Service Zoning District.

Third, the significance of the coastal resources affected by the project is less than significant as the impacts to visual resources are low; furthermore, no views of the ocean are impacted. The approved development is designed and conditioned to avoid significant visual impacts, and to limit what impacts there are. In addition, the training tower is sited within the property's current

A-2-HMB-16-0058 (Coastside FPD Tower)

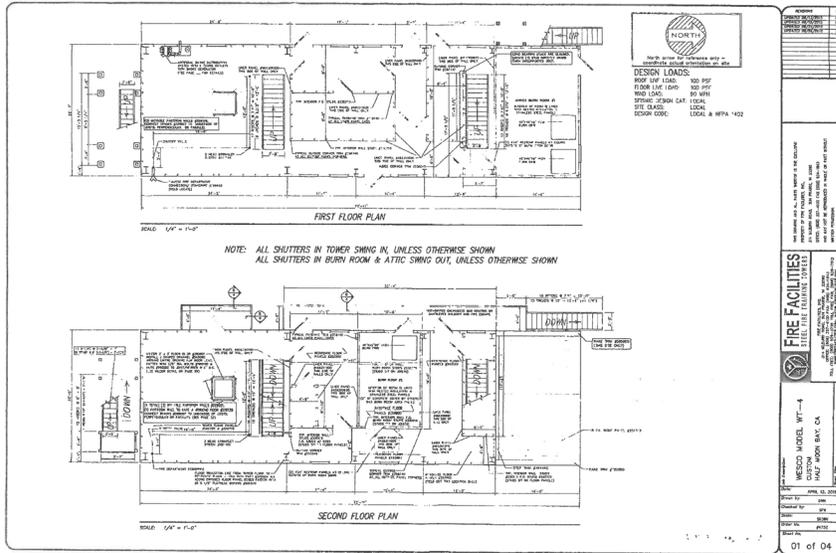
training yard that itself is located inland of both Highway 1 and Main Street in an area that does not affect significant public access, and the project will therefore have no impacts to coastal access or other coastal resources.

Fourth, the approved project does not present an adverse precedent for future interpretations of the LCP, as the visual impacts here are specific to this site. Additionally, the findings above provide guidance regarding visual impact assessment for further development within the corridors of Highway 1 and/or that affects ridgeline views. Finally, the City's approved project raises only local issues as opposed to those of regional or statewide significance due to the scale of the project and the lack of any significant coastal resource impacts.

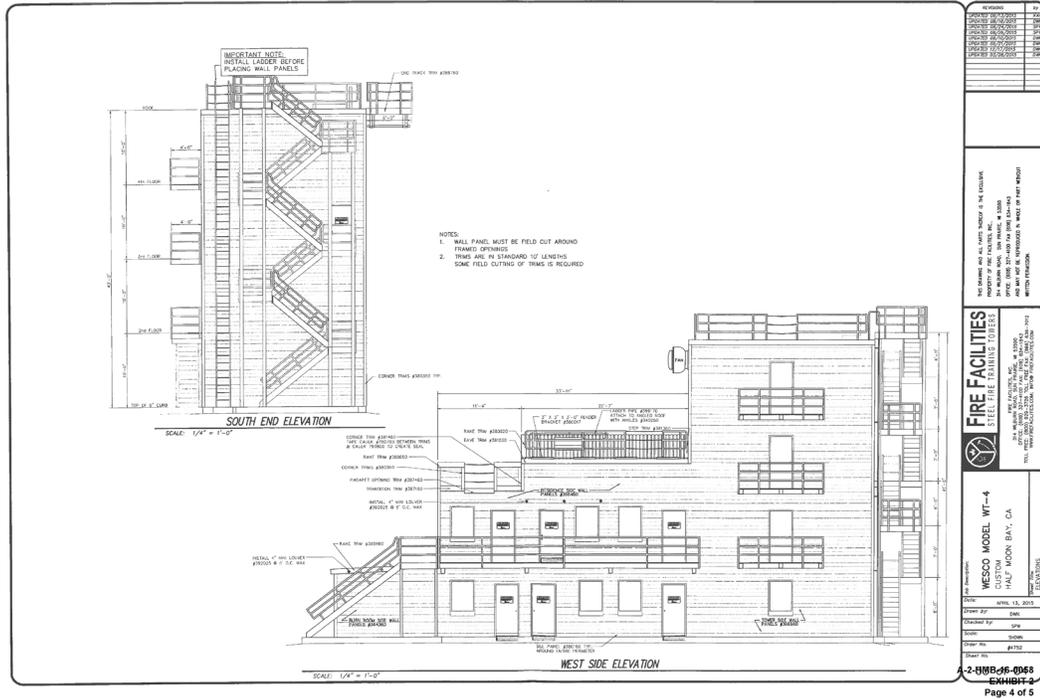
Therefore, although the City's action raises some questions regarding its consistency with LCP visual policies, the Commission finds that the approved development does not result in significant visual resource problems inconsistent with the LCP's intent in this case. That is not to say that such a conclusion would apply to any development affected by these policies that is proposed where it could impact ridgeline and Highway 1 views, rather that in this case the impacts are not significant. Thus, the Commission here exercises its discretion to find no substantial issue with the City's action, and the Commission declines to take jurisdiction over the CDP application for this project.



--- Training Lot Site

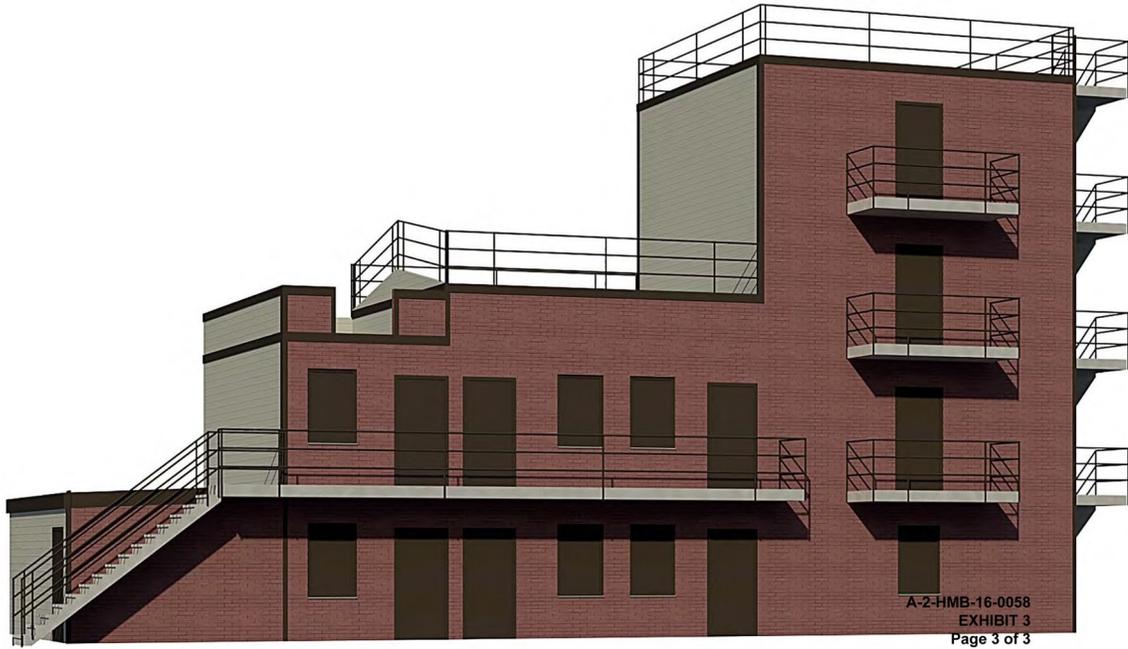


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 EXHIBIT 2
 Page 2 of 5











CITY OF HALF MOON BAY
City Hall • 501 Main Street • Half Moon Bay • 94019

RECEIVED

MAY 06 2016

CALIFORNIA
COASTAL COMMISSION

May 4, 2016

California Coastal Commission
Attn: Stephanie Rexing
45 Fremont, Suite 2000
San Francisco, CA 94105-2219

Subject: Notice of Final Action: PDP-15-046 – Coastal Development Permit and Architectural Review for construction of a prefabricated fire training tower of approximately 45 feet in height and 4,497 square feet in floor area, on a 86,463 square-foot lot developed with an existing fire station and fire training yard located at 1191 Main Street in the P-S, Public Service Zoning District.

Dear Ms. Rexing,

Attached is the Notice of Final Action for Coastal Development Permit PDP-15-046 which was approved by the Half Moon Bay City Council on May 3, 2016. City Council Resolution C-2016-034 for approval of Coastal Development Permit PDP-15-046, findings (Exhibits A and B) and conditions (Exhibit C) are included with this letter.

Should you have questions regarding the Notice of Final Action and supporting material, please contact me at (650)712-5836 or at chamilton@hmbcity.com.

Sincerely,

Carol Hamilton
Senior Planner

cc: Paul Cole, 1191 Main Street, Half Moon Bay, CA 94019

**FINAL LOCAL
ACTION NOTICE**
REFERENCE # 2-HMB-16-0415
APPEAL PERIOD 5/9/16-5/20/16

A-2-HMB-16-0058
EXHIBIT 4
Page 1 of 2



NOTICE OF FINAL LOCAL ACTION

Coastal Development Permit

City of Half Moon Bay Planning Division
501 Main Street, Half Moon Bay, CA 94019
(650) 726-8250 FAX (650) 726-8261

Date: May 4, 2016 File: PDP-15-046

Applicant: Coastside Fire Protection District
Paul Cole, Assistant Chief
1191 Main Street
Half Moon Bay, CA 94019

Planner: Carol Hamilton, Senior Planner

This notice is being distributed to the Coastal Commission and to those who requested notice. The following project is not located within the appealable area of the Coastal Zone; however, as a major public works project, the project is appealable to the Coastal Commission. The City Council approved the Coastal Development Permit on Tuesday May 3, 2016, by Resolution No. C-2016-34.

Project Description: PDP-15-046 – Coastal Development Permit and Architectural Review for construction of a prefabricated fire training tower of approximately 45 feet in height and 4,497 square feet in floor area, on a 86,463 square-foot lot developed with an existing fire station and fire training yard located at 1191 Main Street in the P-S, Public Service Zoning District, based upon the Findings and Evidence contained in Exhibit A and B of the Resolution, and subject to the Conditions of Approval contained in Exhibit C of Resolution C-2016-34.

Project Location: 1191 Main Street

APN: 064-370-050

Term of Permit: This permit shall expire one year from the date the appeal period ends if development authorized by the permit has not commenced.

Final Action: Approved by the City Council on May 3, 2016, based upon findings and conditions contained in Resolution C-2016-34.

This project is not located within the Appeals Jurisdiction of the California Coastal Commission; however the project is appealable to the Coastal Commission as a major public works project.

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EXHIBIT 4
Page 2 of 2

STATE OF CALIFORNIA -- THE RESOURCES AGENCY

EDMUND G. BROWN JR., Governor

CALIFORNIA COASTAL COMMISSION

NORTH CENTRAL COAST DISTRICT OFFICE
45 FREMONT STREET, SUITE 2000
SAN FRANCISCO, CA 94105-2219
VOICE (415) 904-5260
FAX (415) 904-5400
TDD (415) 597-5885



APPEAL FROM COASTAL PERMIT DECISION OF LOCAL GOVERNMENT

Please Review Attached Appeal Information Sheet Prior To Completing This Form.

SECTION I. Appellant(s)

Name: Kevin J. Lansing (President, Citizens for Preserving Rural Half Moon Bay).

Mailing Address: 359 Filbert Street

City: Half Moon Bay, California

Zip Code: 94019

Phone: 415-314-2596

SECTION II. Decision Being Appealed

1. Name of local/port government: City of Half Moon Bay

2. Brief description of development being appealed:

Construction of a prefabricated fire training tower of approximately 45 feet in height and 4,497 square feet in floor area, on a 86,463 square-foot lot.

3. Development's location (street address, assessor's parcel no., cross street, etc.):

1191 Main Street, Half Moon Bay, San Mateo County, San Mateo County APN: 06081-064370050

4. Description of decision being appealed (check one.):

- Approval; no special conditions
- Approval with special conditions:
- Denial

Note: For jurisdictions with a total LCP, denial decisions by a local government cannot be appealed unless the development is a major energy or public works project. Denial decisions by port governments are not appealable.

TO BE COMPLETED BY COMMISSION:

APPEAL NO: _____

DATE FILED: _____

DISTRICT: _____

**A-2-HMB-16-0058
EXHIBIT 5
Page 1 of 7**

APPEAL FROM COASTAL PERMIT DECISION OF LOCAL GOVERNMENT (Page 2)

5. Decision being appealed was made by (check one):

- Planning Director/Zoning Administrator
- City Council/Board of Supervisors
- Planning Commission
- Other

6. Date of local government's decision: May 3, 2016

7. Local government's file number (if any): PDP-15-046

SECTION III. Identification of Other Interested Persons

Give the names and addresses of the following parties. (Use additional paper as necessary.)

a. Name and mailing address of permit applicant:

Coastside Fire Protection District
Paul Cole
1191 Main Street
Half Moon Bay CA, 94019

b. Names and mailing addresses as available of those who testified (either verbally or in writing) at the city/county/port hearing(s). Include other parties which you know to be interested and should receive notice of this appeal.

Jules Sofer, 536 Poplar St HMB 94019
Pamela Fisher, 659 Highland St HMB 94019
Paulette Eisen, 439 Kehoe Ave HMB 94109
James Benjamin, 400 Pilarcitos Ave HMB 94019
Jack McCarthy, 400 California Ave, Moss Beach 94018
Chad Hooker, 423 San Benito St, HMB 94019
David Schorr, 423 Saint Joseph Ave HMB 94019
Frank & Doreen Gerrity, 689 Silver Ave HMB 94019
Sarah Lambert, 701 Arnold Way HMB 94019
Naomi Patridge, 487 Laurel Ave HMB 94019
Gaylord Galiher, 44 Fairway Place HMB 94019
Kathleen Rehm 630 Mill St HMB 94019
Don Prestosz, 250 San Mateo Rd #38 HMB 94019
Shirley Holley 233 Central Ave HMB 94019
Paul Grigorieff, 2101 Winged Foot Rd HMB 94019
Steve Patton, 1577 Spinnaker Lane.HMB 94019
John Ullom, P.O. Box 704 HMB 94019
David Eblovi, 14 Muirfield Rd HMB 94019
Michael Alifano, 255 Main St HMB 94019
Justin Stockman, 250 San Mateo Rd HMB 94019
Steve & Jamie Barber, 401 Main St HMB 94019
George & Betsy del Fierro, 401 Main St HMB 94019
Stan & Patty Pastorino, 12491 San Mateo Rd HMB 94019
Alice Cottrell, 24 Amesport Landing HMB 94019
Kevin Kelly, 1 Miramontes Point Rd HMB 94019
Steve Kikuchi, 730 Mill St HMB 94019
Wiley Johnson, 4844 Beacon Hill, Castro Valley CA 94552

**A-2-HMB-16-0058
EXHIBIT 5
Page 2 of 7**

APPEAL FROM COASTAL PERMIT DECISION OF LOCAL GOVERNMENT (Page 3)

SECTION IV. Reasons Supporting This Appeal

PLEASE NOTE:

- Appeals of local government coastal permit decisions are limited by a variety of factors and requirements of the Coastal Act. Please review the appeal information sheet for assistance in completing this section.
- State briefly **your reasons for this appeal**. Include a summary description of Local Coastal Program, Land Use Plan, or Port Master Plan policies and requirements in which you believe the project is inconsistent and the reasons the decision warrants a new hearing. (Use additional paper as necessary.)
- This need not be a complete or exhaustive statement of your reasons of appeal; however, there must be sufficient discussion for staff to determine that the appeal is allowed by law. The appellant, subsequent to filing the appeal, may submit additional information to the staff and/or Commission to support the appeal request.

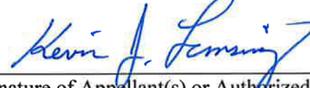
See Attachment.

A-2-HMB-16-0058
EXHIBIT 5
Page 3 of 7

APPEAL FROM COASTAL PERMIT DECISION OF LOCAL GOVERNMENT (Page 4)

SECTION V. Certification

The information and facts stated above are correct to the best of my/our knowledge.



Signature of Appellant(s) or Authorized Agent

Date: May 20, 2016

Note: If signed by agent, appellant(s) must also sign below.

Section VI. Agent Authorization

I/We hereby authorize _____
to act as my/our representative and to bind me/us in all matters concerning this appeal.

Signature of Appellant(s)

Date: _____

Appeal Attachment

The proposed project is not consistent with numerous provisions and policies of Half Moon Bay's certified Local Coastal Program (LCP), as detailed below. It is the clear intent of the City's LCP to protect scenic views of the eastern hills which are described as "a major attribute of the City's setting." The issues raised in this appeal are substantial because the City contends that the LCP provisions and policies cited below do not apply to this project. The issues raised in this appeal extend beyond the current project. If the City's interpretation of the LCP goes unchallenged, it will set a bad precedent for future projects that have potential to permanently degrade scenic views of the City's eastern hills as seen from Highway 1.

After a local appeal, the City Council approved a 45 foot fire training tower---5 feet lower than the original 50 foot design submitted by the applicant. In requesting the height reduction, the City Council acknowledged the need to protect scenic resources. However, the 45 foot tower would still project above the ridge line skyline as seen from Highway 1, thus violating Zoning Code section 18.37.035(C), which states "Structures shall be sited so as to not intrude or project above the ridge line skyline as seen from Highways 1 and 92."

Figure 1 shows a photo taken from the western shoulder of Highway 1 in January 2016. The photo shows the 50 foot story poles erected by the applicant for the original design tower. From the photo, it is clear that a further height reduction to approximately 35 feet is needed to comply with Zoning Code section 18.37.035(C). An even larger height reduction would be needed if the proposed tower were viewed from the middle of Highway 1 or from the eastern shoulder of Highway 1.

Figure 2 shows a rendering of the 45 foot redesigned tower. This rendering was prepared by the applicant (source: Half Moon Bay City staff report dated May 3, 2016). Unlike Figure 1, there are no height reference points (e.g., story poles) to verify the accuracy of the applicant's rendering. In fact, the rendering presents a misleading depiction of the tower's true height in relation to the ridge line skyline when seen from this and other parts of Highway 1. The story poles shown in Figure 1 indicate that the 45 foot tower would continue to project above the ridge line skyline by about 10 feet when viewed from the western shoulder of Highway 1.

The project is not consistent with the following additional provisions and policies of the City's certified LCP:

Land Use Plan (LUP) Chapter 7 states: "The hillside along the City's eastern boundary is a major attribute of the City's setting. Coordinated County and City measures to protect the scenic quality of these hillsides are necessary."

LUP policy 7-10.states "Structures shall be subordinate in appearance to the natural landform, shall be designed to follow the natural contours of the landscape, and shall be sited so as not to intrude into the skyline as seen from public viewing places."

Zoning Code Section 18.01.010(G) states "Conserve and enhance important visual resources within the city, including...views of the inland hillsides at the eastern edge of the city."

Zoning Code section 18.37.010(E) states "Allow development only when it is visually compatible with the character of the surrounding areas."

Zoning Code section 18.37.010(A) and Coastal Act section 30251 state "The scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance."

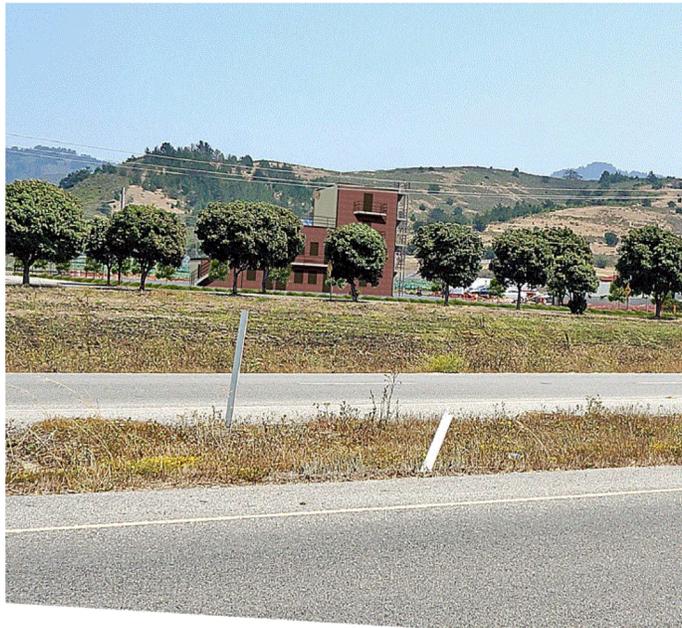
Figure 1

This photo was taken from the western shoulder of Highway 1 in January 2016. The story poles erected by the applicant show the 50 foot height of the original design tower. A reduction in height to approximately 35 feet is needed to prevent intrusion above the ridge line skyline as seen from west shoulder of Highway 1. An even larger height reduction would be needed if the proposed tower were viewed from the middle of Highway 1 or from the eastern shoulder of Highway 1.



Figure 2

Applicant's rendering of the 45 foot redesigned tower. Source: Half Moon Bay City staff report dated May 3, 2016. Unlike Figure 1, there are no height reference points (e.g., story poles) to verify the accuracy of the rendering. In fact, the rendering presents a misleading depiction of the tower's true height in relation to the ridge line skyline when seen from this and other parts of Highway 1. The story poles shown in Figure 1 indicate that the 45 foot tower would continue to project above the ridge line skyline by about 10 feet when viewed from the western shoulder of Highway 1.



**RESOLUTION NO. C-2016-34
PDP-15-046**

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF HALF MOON BAY FOR A COASTAL DEVELOPMENT PERMIT AND ARCHITECTURAL REVIEW FOR CONSTRUCTION OF A PREFABRICATED FIRE TRAINING TOWER OF APPROXIMATELY 45 FEET IN HEIGHT AND 4,497 SQUARE FEET IN FLOOR AREA, ON A 86,463 SQUARE-FOOT LOT DEVELOPED WITH AN EXISTING FIRE STATION AND FIRE TRAINING YARD LOCATED AT 1191 MAIN STREET IN THE P-S, PUBLIC SERVICE ZONING DISTRICT (APN 064-370-050)

WHEREAS, an application was submitted requesting approval of a Coastal Development Permit and Architectural Review for construction of a prefabricated fire training tower of approximately 45 feet in height and 4,497 square feet in floor area, on an 86,463 square-foot lot developed with an existing fire station and fire training yard in the PS, Public Service Zoning District (APN 064-370-050);

WHEREAS, the procedures for processing the application have been followed as required by law; and

WHEREAS, the City of Half Moon Bay Planning Commission, as the Advisory Body to the City Council, conducted duly noticed public hearings on December 8, 2015 and January 26, 2016, at which time all those in attendance desiring to be heard on the matter were given an opportunity to be heard; and

WHEREAS, following the close of the public hearing on January 26, 2016, the Planning Commission voted to approve the project; and

WHEREAS, an appeal of the Planning Commission approval was filed on February 9, 2016; and

WHEREAS, the City Council conducted a duly-noticed public hearing on March 1, 2016 at which time all those desiring to be heard on the matter were given an opportunity to be heard; and

WHEREAS, the City Council voted unanimously to continue the item to allow the applicant to consider aesthetic modifications; and

WHEREAS, the City Council reopened the duly-noticed hearing on May 3, 2016 to consider the redesign of the project; and

WHEREAS, the City Council considered all written and oral testimony presented for consideration; and

WHEREAS, the Coastside Fire Protection District adopted a Mitigated Negative Declaration, and Mitigation Monitoring and Reporting Program for the project in conformance with the requirements of the California Environmental Quality Act (CEQA); and

WHEREAS, the City Council has reviewed and considered the Final Mitigated Negative Declaration and Initial Study adopted by the Coastside Fire Protection District for the Coastside

**A-2-HMB-16-0058
EXHIBIT 6
Page 1 of 24**

Fire Protection District Fire Training Prop, in conformance with Section 15050(b) of the CEQA Guidelines; and

WHEREAS, the City Council has made the required findings for approval of the project, set forth in Exhibit A to this resolution;

NOW, THEREFORE, BE IT RESOLVED that based upon the Findings in Exhibits A and B, and subject to the Amended Conditions of Approval in Exhibit C, the City Council approves application No. PDP-15-046.

PASSED AND ADOPTED by the City of Half Moon Bay City Council at a duly noticed public hearing held May 3, 2016.

AYES, Councilmembers: Fraser, Kowalczyk, Muller, Penrose, and Ruddock

NOES, Councilmembers:

ABSENT, Councilmembers:

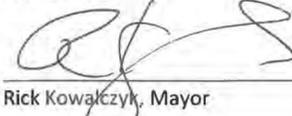
ABSTAIN, Councilmembers:

ATTEST:



Jessica Blair, Interim City Clerk

APPROVED:



Rick Kowalczyk, Mayor

**EXHIBIT A
RESPONSE TO APPEAL
City Council Resolution C-2016-
PDP-15-046**

Coastal Development Permit and Architectural Review for construction of a prefabricated fire training tower of approximately 45 feet in height and 4,497 square feet in floor area on a 86,463 square-foot lot developed with an existing fire station and fire training yard located at 1191 Main Street in the PS, Public Service Zoning District (APN 064-370-050)

Grounds for Appeal 1

The project does not conform to visual resource standards protecting views of the eastern hills from Highway one. Specifically, the project violates an objective standard in the LCP/IP §18.37 et seq "Visual Resources Protection Standards" by projecting above the ridgeline into the skyline when viewed from Highway One.

Response

The referenced visual resource standards (Zoning Code Section 18.37.035, *Upland slope standards*) apply to development in or adjacent to upland slopes. Zoning Code Section 18.37.020 identifies upland slopes as scenic hillsides visible from Highway 1 and 92, which are hillside areas above the 160-foot elevation contour line. The subject site is not located on or adjacent to an upland slope or to a hillside of any sort; therefore, it is not subject to the upland slope standards. Consistent with this conclusion, the existing Fire Station 40 was previously found to be in conformance with the Zoning Code despite the fact that it extends above the ridgeline as viewed from Highway 1. The fact that the Fire Training site is located across the street from a PUD (and thus could be considered adjacent to a visual resource area), does not mean that the project is subject to the development standards identified for other visual resource areas, such as upland slopes, the Old Downtown, or beach viewshed standards.

Grounds for Appeal 2

The proposed tower violates Municipal Code §18.01.010(G), which states "Conserve and enhance important visual resources within the city, including views of Highway 1 of the Pacific Ocean and coastal beaches and bluffs, the visual character of the old downtown area, and views of inland hillsides at the eastern edge of the city."

Response

The revised training tower reduces the height of the proposed facility to 45 feet and increases transparency at the top of the structure by replacing the parapet with an open railing, such that the solid, enclosed portion of the structure is 40.5 feet in height, just 5.1 feet above the height of the existing Fire Station 40. The training structure will be visible from Highway 1, but is not expected to be visually intrusive or significantly obstruct views of the hillsides due to the structure's relatively small size, its distance from the Highway, the lot's remaining open area, the screening provided by existing street trees on either

side of Main Street, and the effective use of materials and color which blends with the background.

Grounds for Appeal 3

The project is not consistent with Municipal Code §18.37.010 (E) which states "Allow development only when it is visually compatible with the character of the surrounding areas" or with Municipal Code §14.37.035(G) which states "The proposed developed shall be compatible in terms of height, bulk and design with other structures and environment in the area". The proposed tower would clash sharply with the surrounding buildings that include: the existing fire station, 2) the community theatre, 3) the houses of Main Street Park, 4) the Ford dealership, 5) a working farm house, and 6) the nearby historic Johnston House.

Response

Buildings of varying architectural styles inform the existing visual character of the vicinity of the project site. Fire Station 40, located on the same parcel as the proposed training facility, is a single-story building 35.4 feet in height with a sloped standing-seam metal roof with large eaves and five fire engine bays with roll-up doors. The Coastal Repertory Theater is an industrial building with a domed roof, and residential development located further north consists of two-story buildings with pitched roofs. Single-story buildings and surface parking are located along Main Street to the northwest. The historic Johnston House is located on the south side of Higgins Canyon Road, approximately one-third mile from the site, and a farmhouse and agricultural operation are located on the north side of Higgins Canyon Road approximately one-quarter mile from the site.

The revised training structure reduces the height of the proposed facility to 45 feet and increases transparency at the top of the structure by replacing the parapet with an open railing, such that the solid, enclosed portion of the structure is 40.5 feet in height, just 5.1 feet above the height of the existing Fire Station 40. The proposed structure is considerably smaller, but taller than the adjacent buildings. The structure's lot coverage, at approximately 1,875 square feet, is less than 6% of the total area of the site. The visual effect of the additional height is moderated by the building's small size; its greater massing at the ground level; by the building location, which is set back 138 feet from Main Street, 135 feet from the theater, and 130 feet from Fire Station 40; and by the effective use of materials and color which blends with the background.

The height and design of the proposed training facility is intrinsic to its use. The Fire District has indicated that the facility is intended to simulate building types and occupancies existing in the District's service area - with operable doors, windows, stairwells, balconies, roof areas, fire hose connections, burn rooms, rappelling anchors, moveable interior wall partitions, and operable shutters. As result, the building is somewhat utilitarian and industrial in appearance. This look is not an abrupt contrast with that of the existing fire station with its standing seam metal roof and large fire engine bays, or with the industrial style and chain link fencing of the adjacent theater building. The training facility's small size and location at the back of the site minimizes the visual effect from Main Street. The Conditions of Approval in Exhibit C require that the

building be maintained in good condition at all times and that it be cleaned as necessary after use to ensure the outer surface is free of burn marks or other blemishes.

Both the existing buildings and the proposed training tower contrast with the Johnston House and the old farmhouse located to the east and southeast of the site. This contrast reflects provisions of the City's Land Use Plan, which designates sites fronting on Main Street for urban uses, but designates properties south of Higgins Canyon Road as Open Space Reserve, and establishes a city boundary to the east and south east beyond which rural uses of the County's PAD(CD) Planned Agricultural District apply.

Grounds for Appeal 4

Municipal Code §14.37.035(I) states "if the project site is located in an area considered by the committee as having a unified design character or historical character, the design shall be compatible with such character." The nearby Johnston House (which dates to 1855) is listed in the National Register of Historic Places. The proposed tower clashes sharply with the rural historical character of the area.

Response

The area surrounding the project site does not have a unified design character or historical character in that the existing buildings located in the vicinity of the site (or within one-third mile of the site) vary significantly in age and design.

Grounds for Appeal 5

Municipal Code §14.37.030(B) states "Requirements which are more restrictive than the development standards set forth in the city's zoning code may be imposed on a project when the community development director, planning commission, or city council on appeal concludes such requirements are necessary either to promote the internal integrity of the design of the project or to assure compatibility of the proposed project's design with its site and surroundings." The southern end of Main Street has a quiet, rural feel that will be compromised by this tower and associated training activities. Basic community planning principles tell us that this is the wrong place for an industrial tower that will be buzzing with training activity. Environmental review of the project should have considered alternative locations for the tower, and denial would motivate such consideration for any resubmitted project.

Response

See response to Grounds for Appeal 3. The California Environmental Quality Act requires an alternatives analysis for projects for which an Environmental Impact Report (EIR) is prepared. An alternatives analysis is not required for projects for which a Negative Declaration is prepared. The Coastside Fire Protection District, as the lead agency, adopted a Mitigated Negative Declaration that indicated, based on mitigation included in the project, that the proposed fire training tower would not result in any significant environmental impact; therefore no alternatives analysis is required as part of the environmental review for the project.

Grounds for Appeal 6

Municipal Code §14.37.040(A) states "In approving any project, the director of community development, planning commission, or city council on appeal shall find that such buildings, structures, planting, paving and other improvements shall be so designed and constructed that they will not be of unsightly or obnoxious appearance...." The proposed tower will be unsightly at all times and will be obnoxious to the public when buzzing with training activities.

Response

See response to Grounds for Appeal 3.

Grounds for Appeal 7

Municipal Code §14.37.035(I) and 18.20.070(F) (6) state "The design shall promote harmonious transition in scale and character in areas located between different designated land uses." This is an area where residential housing gives way to agriculture and open space. The proposed 50-foot tower does not promote harmonious transition in scale and character.

Response

The proposed fire training facility is located between two existing public service uses, the Coastal Repertory Theater (housed in a re-purposed industrial building) and the existing Fire Station, both of which currently stand out in contrast with the open agricultural fields located to the east and south. This contrast is by design; the parcels fronting on Main Street are planned for urban uses. The immediately adjacent agricultural fields to the east and southeast are located outside the City under County jurisdiction and are zoned PAD (CD), which allows primarily for agricultural uses. The property to the south is located within the City boundaries, but is zoned OS-R Open Space Reserve District, which allows for agriculture, open space, and limited residential use.

The revised design of the fire training structure improves the appearance of the structure, by reducing its height, increasing the transparency of the top of the structure and providing a more nuanced brick and painted metal treatment that blends with the background. Nevertheless, the facility remains somewhat utilitarian in appearance. This look is not an abrupt contrast with that of the existing fire station with its standing seam metal roof and large fire engine bays, or with the industrial style building and chain link fencing of the adjacent theater site. Although the total height of the training structure is 9.6 feet taller than the existing fire station and 18 feet taller than the theater, the overall scale of the building is relatively small. The visual effect of the training tower's height is moderated by the building's small size; its concentration of massing at the ground level; by the building location, which is set back 138 feet from Main Street, 135 feet from the theater, and 130 feet from the fire station; and by the effective use of materials and color that blends with the background. With implementation of the training tower, the existing fire station is likely to continue to be the most visually dominant structure as viewed from Highway 1, due to its prominent corner location, large size, and iconic red roof.

Grounds for Appeal 8

The City's Downtown Specific Plan §4.311 states: "Enhance the visual appeal of the principal gateways into the downtown area." Even when it does not emit smoke, this industrial tower degrades the visual appeal of the City's southern gateway. Therefore the project does not comply with the City's Downtown Specific Plan.

Response

The project site is located at what is generally considered to be the southerly gateway to Downtown Half Moon Bay. Although the subject site is not located within the area of the Downtown Specific Plan, the Plan identifies the intersection of Higgins Canyon Road and Main Street as a gateway intersection. The Specific Plan includes policies promoting gateway signage and beautification and calling for removal of features that detract from the visual appeal of the gateway, such as inoperable vehicles and sign clutter. The gateway policies do not provide guidance for surrounding development. See responses to Grounds for Appeal 3 and 7 in regard to the project's compatibility with this gateway location.

Grounds for Appeal 9

The proposed tower violates California Coastal Act §30251, an adopted policy of the City's LCP which states "The scenic visual qualities of coastal areas shall be considered and protected as a resource of public importance", reinforced by Municipal Code §18.37.010(A). For all the previously stated reasons, approval of the fire tower fails to consider or protect the City's visual resources.

Response

As indicated in the response to Grounds for Appeal 1-8, the revised design of the training structure will not negatively impact a visual resource area, will not significantly block views of the hillsides, and is reasonably compatible with adjacent development.

Grounds for Appeal 10

The project is appealable to the Coastal Commission in that it meets the definition of a "major public works project". The noticing for the project failed to identify the project as appealable to the Coastal Commission.

Response

The project meets the definition of a "major public works project" and is appealable to the Coastal Commission. Zoning Code Subsection 18.20.060.A.6 requires that notices for projects located in the Appealable Area of the Coastal Zone state that the project is appealable to the Coastal Commission. The subject project is not located in the Appealable Area of the Coastal Zone; therefore Subsection 18.20.060.A.6 does not apply. Although the project is a major public works project that is appealable to the Coastal Commission, the Zoning Code does not require this to be identified in the public notice.

Grounds for Appeal 11

There are other compliance issues, such as segmentation of the project (the project was segmented into an after-the-fact permit for a parking lot phase, which was modified after

approval to support the impending tower with utilities and cutouts, and a separate CDP for the building, thereby circumventing the requirement that CEQA analysis address the whole of the project).

Response

Pursuant to CEQA, the Coastside Fire Protection District (CFPD) is the lead agency for projects it seeks to implement within the City of Half Moon Bay. CFPD submitted two recent Coastal Development Permit (CDP) applications to the City for the subject site. The first application (File No. PDP-066-14), for pavement, lighting, fencing, storm water detention and tree removal, was submitted on September 29, 2014 and was determined to be categorically exempt. The project was approved by the Community Development Director on November 4, 2014 at a noticed public hearing. The subject Coastal Development Permit application (File No. PDP-15-046) for the fire training tower was submitted on June 9, 2015 and was the subject of a Mitigated Negative Declaration prepared and adopted by the CFPD.

The CFPD has indicated that funding constraints influenced the order of these applications and that the CDP for pavement and other site improvements had utility for the District, independent of the training tower. Although the fire training tower was included as a strategic goal in the District's 2002 Strategic Plan, funding was not identified until FY 2015/16, after the approval of the pavement and site improvements CDP. A May 27, 2015 CFPD staff report to the Board of Directors identified achievable financing via a lease purchase financing program through Government Capital Corporation. The CDP application for the fire training tower was submitted shortly thereafter.

The pavement and site improvements project (File No. PDP-066-14) did not result in any significant environmental impacts; consequently, addressing that application in the environmental review for the training tower would not have changed the conclusions of the Mitigated Negative Declaration.

**EXHIBIT B
FINDINGS AND EVIDENCE
City Council Resolution C-2016-
PDP-15-046**

Coastal Development Permit and Architectural Review for construction of a prefabricated fire training tower of approximately 45 feet in height and 4,497 square feet in floor area, on a 86,463 square-foot lot developed with an existing fire station and fire training yard located at 1191 Main Street in the PS, Public Service Zoning District (APN 064-370-050)

Coastal Development Permit – Findings for Approval

The required Coastal Development Permit for this project may be approved or conditionally approved only after the approving authority has made the following findings per Municipal Code Section 18.20.070:

1. **Local Coastal Program** – *The development as proposed or as modified by conditions, conforms to the Local Coastal Program.*

Evidence: The project is consistent with the General Plan/Local Coastal Program. The project is located within the Public Facilities and Institutions General Plan designation. This designation is intended to provide for educational, governmental, and institutional uses not normally accommodated in offices located in the general commercial area, such as schools, public works and utility yards, and maintenance buildings and hospitals. The proposed fire training facility is consistent with this designation. The project will not interfere with coastal access and is located on a developed fire station site that is not located in a designated Visual Resource Area or Environmentally Sensitive Habitat Area. The Coastside Fire Protection District filed a Coastal Development Permit application for the project in conformance with LCP Policy 10-1 "City LCP Permitting Requirements," and the project, as revised, is consistent with the Zoning Code and LCP, and is in conformance with LCP Policy 10-2 "City LCP Conformance."

Coastal Act 30240(b) and Policy 3-3 (b): *Development in areas adjacent to environmentally sensitive habitat areas shall be sited and designed to prevent impacts which would significantly degrade such areas, and shall be compatible with the continuance of such habitat areas.*

Compliance: The project site is not located within or adjacent to an environmentally sensitive habitat area.

Coastal Act 30251: *The scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance. Permitted development shall be sited and designed to protect views to and along the ocean and scenic coastal areas, to minimize the alteration of natural land forms, to be visually compatible with the character of surrounding areas, and where feasible, to restore and enhance visual*

quality of visually degraded areas. New development in highly scenic areas such as those designated in the California Coastline Preservation and Recreation Plan prepared by the Department of Parks and Recreation and by local government shall be subordinate to the character of its setting.

Compliance: The revised training structure design reduces the height of the structure to 45 feet and increases transparency at the top of the structure by replacing the parapet with an open railing, such that the enclosed portion of the structure is 40.5 feet in height. The proposed structure and additional perimeter trees (recently planted) will partially obstruct current views of the hillsides available from Main Street across the vacant portion of the site; however, the revised design lessens the visual effect, the relatively small building will leave portions of the site open to views, and the proposed development is consistent with the existing pattern along Main Street where buildings are interspersed with open parking areas and street trees block views at regular intervals. The proposed facility will have an incremental effect on views from Higgins Canyon Road, across the open agricultural fields east of the project site. This effect is expected to be fairly minor in light of the existing pattern of development along Main Street. The proposed facility will be visible from Highway 1, but is not expected to be visually intrusive or significantly obstruct views of the hillsides due to the building's reduce height, relatively small size, its distance from the Highway, and the screening provided by existing trees on both sides of Main Street.

Overall, the revised fire training structure is visually consistent with the pattern of development in the surrounding area. The project is consistent with the height limit of the Zoning Code. It is not located within a designated Visual Resource Area. The relatively small size of the building and its placement on the site mitigate the visual effect of the facility's height in relation to adjacent buildings. The building design is reasonably compatible with the existing fire station and theater buildings, and the project will not significantly affect views from Main Street, Higgins Canyon Road, or Highway 1.

Policy 7-1: *The City will establish regulations to protect the scenic corridor of Highway 1, including setbacks for new development, screening of commercial parking and landscaping associated with new development. The minimum standards shall include all areas within 200 yards of State Highway 1, which are visible from the road.*

Compliance: The subject site is located within 200 yards of State Highway 1; however Highway 1 is not designated a Scenic Highway within the City limits of Half Moon Bay. The project is not located within a Visual Resource Area as designated on the Visual Resources Overlay Map.

Policy 7-5: *All new development, including additions and remodeling, shall be subject to design review.*

Compliance: The proposed project has undergone design review by the City Council and the City Council's findings are included below.

Policy 7-11: *New development along primary access routes from Highway 1 to the beach, as designated on the Land Use Map, shall be designed and sited so as to maintain and enhance the scenic quality of such routes, including building setbacks, maintenance of low height of structures, and landscaping which establishes a scenic gateway and corridor.*

Compliance: The proposed project is not located along a primary coastal access route from Highway 1 and will not affect coastal access.

Coastal Act 30244: *Where development would adversely impact archaeological or paleontological resources as identified by the State Historic Preservation Officer, reasonable mitigation measures shall be required.*

Compliance: The prefabricated training facility will be constructed on a paved site previously disturbed by grading, trenching, and other excavation, which did not uncover cultural resources. No structures of historical significance are located on the site.

2. **Growth Management System** – *The development is consistent with the annual population limitation system established in the Land Use Plan and Zoning Ordinance.*

Evidence: The proposed project does not include new residential development and would not result in any population increase.

3. **Zoning Provisions** – *The development is consistent with the use limitations and property development standards of the base district as well as the other requirements of the Zoning Ordinance.*

Evidence: The proposed fire training facility, a key element of Fire Station 40's on-going training program, is an allowed use within the P-S, Public Service Zoning District. As conditioned, the training facility is consistent with all of the development regulations of the P-S District. The project site is not located within any of the Visual Resource Areas identified in Zoning Code Section 17.37.020 and is not subject to the visual resource protection standards applicable to those areas. The project is not located within, or proximate to an environmentally sensitive habitat area.

4. **Adequate Services** – *The proposed development will be provided with adequate services and infrastructure in a manner that is consistent with the Local Coastal Program.*

Evidence: The proposed project is located on a developed site where all public services and utilities are available. The training facility will facilitate the provision of fire services to the community by enhancing training opportunities for firefighters.

5. **California Coastal Act** – *Any development to be located between the sea and the first public road parallel to the sea conforms to the public access and public recreation policies of Chapter 3 of the California Coastal Act.*

Evidence: The site is located east of Highway 1, and is not located between the sea and the first public road parallel to the sea.

Architectural Site and Design Review – Finding

The required Architectural and/or Site and Design Review for this project may be approved or conditionally approved only after the City Council has made the following findings per Municipal Code Section 14.37.040:

1. *That such buildings, structures, planting, paving and other improvements shall be so designed and constructed that they will not be of unsightly or obnoxious appearance to the extent that they will hinder the orderly and harmonious development of the city;*

In making the above finding, the City Council has reviewed and considered all of the following criteria as identified in Municipal Code Section 14.37.035:

- a. *Where more than one building or structure will be constructed, the architectural features and landscaping thereof shall be harmonious. Such features include height, elevations, roofs, material, color and appurtenances.*
- b. *Where more than one sign will be erected or displayed on the site, the signs shall have a common or compatible design and locational positions and shall be harmonious in appearance.*
- c. *The material, textures, colors and details of construction shall be an appropriate expression of its design concept and function, and shall be compatible with the adjacent and neighboring structures and functions. Colors of wall and roofing materials shall blend with the natural landscape and be non-reflective.*
- d. *The design shall be appropriate to the function of the project and express the project's identity. The planning and siting of the various functions and buildings on the site shall create an internal sense of order and provide a desirable environment for occupants, visitors, and the general community.*
- e. *Roofing materials shall be wood shingles, wood shakes, tile or other materials such as composition as approved by the appropriate design review authority. No mechanical equipment shall be located upon a roof unless it is appropriately screened.*
- f. *The proposed development shall be compatible in terms of height, bulk and design with other structures and environment in the immediate area.*
- g. *The proposed design shall be consistent with the applicable elements of the general plan.*
- h. *If the project site is located in an area considered by the committee as having a unified design character or historical character, the design shall be compatible with such character.*

- i. *The design shall promote harmonious transition in scale and character in areas located between different designated land uses.*
- j. *The design shall be compatible with known and approved improvements and/or future construction, both on and off the site.*
- k. *Sufficient ancillary functions provided to support the main functions of the project shall be compatible with the project's design concept.*
- l. *Access to the property and circulation systems shall be safe and convenient for equestrians, pedestrians, cyclists and vehicles.*
- m. *The amount and arrangement of open space and landscaping shall be appropriate to the design and the function of the structures.*
- n. *Where feasible, natural features shall be appropriately preserved and integrated with the project.*
- o. *Landscaping shall be in keeping with the character or design of the building, and preferably clustered in natural appearing groups, as opposed to being placed in rows or regularly spaced. The landscape design concept for the site, as shown by the relationship of plant masses, open space, scale, plant forms and foliage textures and colors, shall create a desirable and functional environment and the landscape concept shall depict an appropriate unity with the various buildings on the site. Plant material shall be suitable and adaptable to the site, shall be capable of being properly maintained on the site, and shall be of a variety which would tend to be drought-resistant and to reduce consumption of water in its installation and maintenance.*
- p. *The design shall be energy efficient and incorporate renewable energy design elements including, but not limited to:*
 1. *Exterior energy design elements;*
 2. *Internal lighting service and climatic control systems; and*
 3. *Building siting and landscape elements.*

Evidence:

The project proposes the construction of a prefabricated fire training facility that is 45 feet tall and 4,497-square-feet on the almost 2-acre Fire Station 40 site located at the northeast corner of the intersection of Main Street and Higgins Canyon Road, with Highway 1. Proposed materials include brick and painted metal siding in a clapboard design. The revised exterior building color blends with colors of natural features located east of the site. No exterior lighting is proposed on the building. Small signs are included on doors and walls for field location purposes. No other new signage is proposed. Improvements were previously approved and constructed on the site (through applications PDP-066-14 and PDP-15-010) that will complement and support the training facility. These include pavement, gated vehicular access from Main Street, tubular steel perimeter fencing, light standards, a bioswale, and 15 additional perimeter trees. A 10,000-gallon, below-grade draughting pit, approved under Coastal Development Permit Exemption PDP-15-010, would retain and recycle water used during routine training.

The project site is located at what is generally considered to be the southerly gateway to Downtown Half Moon Bay. Although the subject site is not located within the area of the Downtown Specific Plan, the Plan identifies the intersection of Higgins Canyon Road and Main Street as a gateway intersection. The Specific Plan includes policies promoting gateway signage and beautification and calling for removal of features that detract from the visual appeal of the gateway, such as inoperable vehicles and sign clutter. The gateway policies do not provide guidance for surrounding development.

Buildings of varying architectural styles inform the existing visual character of the vicinity of the project site. Fire Station 40, located on the same parcel as the proposed training facility, is a single-story building with a sloped standing-seam metal roof with large eaves and five fire engine bays with roll-up doors. The Coastal Repertory Theater is an industrial building with a domed roof, and residential development located further north consists of two-story buildings with pitched roofs. Single-story buildings and surface parking are located along Main Street to the northeast.

The project includes placement of a 4-story, 4,497 square-foot training facility at the north end of the project site, between the existing Coastal Repertory Theater and Fire Station 40. The proposed building has a footprint and massing that is considerably smaller, but somewhat taller than that of the adjacent buildings. The building's lot coverage, at approximately 1,875 square feet, is less than 6% of the total area of the training lot. The building's upper stories step back from a ground floor of 1,604 square feet to a relatively slender top floor of 550 square feet. The overall height is 45 feet, approximately 9.6 feet taller than the adjacent Fire Station 40 and 18 feet taller than the adjacent theater. The height of the enclosed/solid portions of the structure is 40.5 feet. The visual effect of this additional height is moderated by the building's small size; its greater massing at the ground level; the fact the top 4.5 feet consists of open railing; the building location, which is set back 138 feet from Main Street, 135 feet from the theater, and 130 feet from the fire station; and by the effective use of color that blends with the background.

The height and design of the proposed training facility is intrinsic to its use. The Fire District has indicated that the facility is intended to simulate building types and occupancies existing in the District's service area - with operable doors, windows, stairwells, balconies, roof areas, fire hose connections, burn rooms, rappelling anchors, moveable interior wall partitions, and operable shutters. Even considering the revised design with its brick front façade, the building is somewhat utilitarian in appearance. This look is not an abrupt contrast with that of the existing fire station with its standing seam metal roof and large fire engine bays, or with the industrial style of the adjacent theater building. The training facility's small size and location at the back of the site minimizes the visual effect from Main Street. The Conditions of Approval in Exhibit C require that the building be maintained in good condition at all times and that it be cleaned as necessary after use to ensure the outer surface is free of burn marks or other blemishes.

The proposed building and additional perimeter trees (planted as part of the prior training yard project) will partially obstruct current views of the hillsides available from Main Street across the vacant portion of the site; however, the relatively small building will leave portions of the site open to views, and the development is consistent with the existing pattern along Main Street where buildings are interspersed with open parking areas and street trees block views at regular intervals. The proposed facility will have an incremental effect on views from Higgins Canyon Road, across the open agricultural fields east of the project site. This effect is expected to be fairly minor in light of the existing pattern of development along Main Street. The proposed facility will be visible from Highway 1, but is not expected to be visually intrusive or significantly obstruct views of the hillsides due to the building's relatively small size, its distance from the Highway, the effective use of color to blend with colors of natural features located east of the site, and the screening provided by existing and proposed street trees on both sides of Main Street.

Overall, the proposed fire training facility is visually consistent with the pattern of development in the surrounding area. It is not located within a designated Visual Resource Area. The relatively small size of the building and its placement on the site mitigate the visual effect of the facility's height in relation to adjacent buildings. The building design is reasonably compatible with the existing fire station and theater buildings, and the project will not significantly affect views from Main Street, Higgins Canyon Road, or Highway 1.

2. *That such buildings, structures, planting, paving and other improvements will not impair the desirability or opportunity to attain the optimum use and the value of the land and the improvements, or otherwise impair the desirability of living or working conditions in the same or adjacent areas; and*

Evidence: The revised design of the fire training facility is compatible with its surroundings so that it will not impair the desirability of living or working in the area, as discussed under Architectural Finding 1. The Conditions of Approval in Exhibit C require that the building be maintained in good condition at all times, that it be cleaned as necessary after use to ensure the outer surface is free of burn marks or other blemishes, and prohibit training activities on holidays. Furthermore, the project will optimize the use and value of the land for the existing fire station use by providing a state of the art fire training facility that enables fire fighters to train under realistic simulated conditions that reflect the building types and uses within the Coastside Fire District's service area.

Environmental Review – Finding

- CEQA** – The project will not have a significant effect on the environment.

Evidence: The Coastside Fire Protection District, as the lead agency for the project, adopted a Final Mitigated Negative Declaration (MND) and Mitigation Monitoring and

Reporting Program (MMP) based on an Initial Study (IS) which identified mitigation to reduce all potentially significant impacts to a less than significant level in conformance with the requirements of the California Environmental Quality Act. This mitigation has been included in the Conditions of Approval for the project (Exhibit B).

**EXHIBIT C
CONDITIONS OF APPROVAL
City Council Resolution C-2015-
PDP-15-046**

Planning Commission decision to approve a Coastal Development Permit and Architectural Review for construction of a prefabricated fire training tower of approximately 45 feet in height and 4,497 square feet in floor area with an unenclosed platform of 550 square feet, on a 86,463 square-foot lot developed with an existing fire station and fire training yard located at 1191 Main Street in the PS, Public Service Zoning District (APN 064-370-050)

Authorization: Approval of this permit authorizes a request for a Coastal Development Permit and architectural review to allow installation of a prefabricated fire training facility at the Fire Station 40 site in the P-S, Public Service Zoning District and the Public Facilities and Institutions General Plan designation.

A. The following Conditions shall apply to the subject site:

1. CONFORMANCE WITH APPROVED PLANS. Development of the site shall conform to the approved plans entitled: *Proposed Fire Prop, Coastside County Water District* and date stamped April 13, 2016, except for any revisions required by this permit. The Community Development Director shall review and may approve any deviation from the approved plans that is deemed to be minor in nature. Any other change shall require the submittal of a major modification application and fees and shall be subject to a public hearing as required by Title 18.
2. CONFORMANCE WITH CONDITIONS OF APPROVAL. The permittee shall construct and operate this Project in full conformance with these Conditions of Approval. Any revision of the Conditions of Approval shall require submittal of a major modification subject to a public hearing as required by Title 18.
3. PLAN REVISIONS. Prior to issuance of a building permit, the permittee shall revise the project plans in conformance with the following, to the satisfaction of the Community Development Director:
 - a) Revise the project plans as necessary to reflect the material and color option identified in Condition D.8.
4. CONFORMANCE WITH THE MUNICIPAL CODE. No part of this approval shall be construed to permit a violation of any part of the Half Moon Bay Municipal Code. (Planning)
5. PROJECT OPERATION. Operation of the training facility shall conform to the parameters proposed by the Coastside Fire Protection District, as follows:

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- a) Hours of Operation. Training activities at the fire training structure shall be limited to between the hours of 8:00 a.m. and 5:00 p.m. daily, with the following exceptions:
- One night per week training may occur between the hours of 7:00 and 9:00 p.m.; and
 - No training shall occur on any State of California or federal holiday.
- b) Live Fire. Live fire training shall be limited to 15 days per year.
- c) Foam/Hazardous Materials. Neither fire suppression foam nor hazardous materials shall be used in the training operations.
- d) Amplified Sound/Sirens. No amplified sound or sirens shall be used in the training operations.
- e) Maintenance. The permittee shall maintain the fire training structure in good condition at all times, and shall clean or otherwise repair the structure as necessary after each use to maintain the exterior surface in a clean and unblemished condition.
6. MITIGATION MONITORING AND REPORTING. This project shall comply with all of the requirements of the adopted Mitigation Monitoring and Reporting Program (MMRP) adopted by the Coastside Fire Protection District on December 2, 2015 to the satisfaction of the Community Development Director. The permittee shall designate a construction coordinator to maintain a log documenting compliance with the mitigation measures specified in the MMRP, including coordination with the Coastal Repertory Theater to avoid construction during show times. This log shall be available on the site for inspection by the City. (Planning)

B. The following Conditions shall be fulfilled prior to the issuance of building permits:

1. SIGNED CONDITIONS OF APPROVAL. The applicant/owner shall submit a signed copy of the conditions of approval to the Planning Department prior to issuance of a grading permit. (Planning)
2. CONSTRUCTION PLANS. File Number PDP-15-046 and the Conditions of Approval for this project shall be provided on the cover page of the building permit application plan submittal. All plans, specifications, engineering calculations, diagrams, reports, and other data shall be submitted with the appropriate permit application to the City's Building Division for review and approval. (Planning)
3. LOT GRADING, MATERIALS, EQUIPMENT AND VEHICLE STORAGE. No grading, preparation, storage, or placement of construction materials, equipment, or vehicles shall take place

prior to issuance of a grading permit. Any earth movement on or off the site in excess of 50 cubic yards shall require the submittal of a grading plan for review by the City Engineer and issuance of a grading permit. Grading includes, but is not limited to, any leveling, scraping, clearing, or removal of lot surface area. Materials, Equipment, and Vehicles include, but are not limited to:

- a. All masonry, wood, and steel construction materials;
 - b. All construction-related equipment and storage containers;
 - c. All construction-related vehicles, including temporary trailers. (Engineering)
4. EROSION AND SEDIMENT CONTROL. An erosion and sediment control plan shall be submitted that shows effective Best Management Practices (BMP) and erosion and sediment control measures for the site. Construction plans shall also include the "construction best management practices" plan sheet. (Engineering)
 5. STREET/PUBLIC RIGHT-OF-WAY CUTS FOR UTILITY CONNECTIONS. Street cuts for utility connections that are less than twenty (20) feet apart shall be repaired with a single patch. Asphalt repair and overlay shall be in accordance with the City Standard Details. Existing street improvements, if undermined during construction, shall be replaced to match existing (Engineering).
 6. UNDERGROUND UTILITIES/SERVICES. Electric, telecommunication, and cable and utility service to the property shall be through underground service connections only. No overhead utilities are allowed. (Engineering)
 7. COMPLIANCE WITH CBC. All structures shall be constructed in compliance with the standards of the 2013 California Codes of Regulations Title 24, including Building Code, Residential Code, Administrative Code, Mechanical Code, Plumbing Code, Electrical Code, Energy Code, Fire Code and Green Building Code to the satisfaction of the Building Official. (Building)
 8. FIRST FLOOR HEIGHT VERIFICATION. Prior to below floor framing or concrete slab steel reinforcement inspection, a stamped and signed building height verification letter shall be submitted to the City from a licensed land survey certifying that the first floor height as constructed is equal to (or less than) the elevation specified for the first floor height in the approved plans. The building pad shall be at least one-foot above the centerline crown of the roadway or the top of the curb. (Building)
 9. OVERALL PROJECT HEIGHT. Maximum overall height of the project, including any grading, foundation, pad, and building elevations shall be calculated using the elevation points indicated on the topographic survey map submitted at the time of application. The approved height of all projects developed in the City will be measured from existing grade as indicated on the submitted topographical survey. (Building)

10. COMPLETION OF UTILITIES. Any public utilities requiring relocation as a result of the construction of the building(s) or improvements under this permit shall be relocated at the owner's expense. (Building)
11. NOTICE OF DISRUPTION. The permittee shall provide written notice to affected property and business owners and a copy of such notice to the City Engineer a minimum of two business days prior to any planned disruption of pedestrian or vehicular traffic, parking, or public service facilities. (Engineering)
12. CONSTRUCTION MATERIAL STORAGE. Construction material shall not be stored in the street right-of-way without prior approval from the City Engineer. (Engineering)
13. COASTSIDE COUNTY WATER DISTRICT - REGULATIONS. The project shall comply with all applicable regulations and requirements of the Coastside County Water District. Water service shall not be in the same trench as other utilities. (Water District)
14. FIRE CLEARANCE REQUIREMENTS. The permittee shall comply with all applicable fire and building codes and standards relating to fire and panic safety as identified by the Coastside Fire Protection District during the building permit process. (Fire)

C. The following conditions shall be implemented prior to and during construction:

1. NOISE MITIGATION MEASURE 1. Project construction shall conform to all of the following:
 - a) Construction Hours. Construction work shall be limited to the hours of 7:00 a.m. to 6:00 p.m. Monday through Friday; 8:00 a.m. to 6:00 p.m. Saturdays, and 10:00 a.m. to 6:00 p.m. Sundays and holidays, except as expressly authorized by the City Engineer in conformance with Section 14.40.020 of the Half Moon Bay Municipal Code. (Engineering)
 - b) Exhaust Mufflers. All internal combustion engine-driven equipment shall be equipped with intake and exhaust mufflers that are in good condition and appropriate for the equipment.
 - c) Equipment Location. Stationary noise-generating equipment (e.g. generators and compressors) shall be located as far as possible from adjacent residential properties.
 - d) Acoustical Buffers. If stationary noise-generating equipment must be located near existing residential properties, then such equipment shall have temporary acoustical enclosures, blanketing, or barriers to reduce the noise emissions.
 - e) Quiet Technology. The construction shall utilize "quiet" air compressors and other stationary noise sources where technology exists.
 - f) Equipment Idling. Non-essential idling of construction equipment shall be limited to five minutes.
 - g) Construction Plan. The contractor or construction manager shall prepare a construction plan identifying the schedule for major noise-generating construction

- activities. The construction plan shall identify a procedure for coordinating with adjacent residential and other land uses so that construction activities can be scheduled to minimize noise disturbance.
- h) Construction Sign. The construction contractor shall post a sign, clearly visible from the public sidewalk, with a name and telephone number of the construction coordinator who is responsible for responding to noise or other construction complaints. The construction coordinator shall determine the cause of the noise complaint and implement practical and reasonable measures to correct the problem.
2. NOISE MITIGATION MEASURE 2. The construction manager shall coordinate with the Coastside Repertory Theater regarding show times and shall ensure that no construction activities occur on the project site during a show.
3. CONSTRUCTION TRAILERS. Temporary construction trailers are permitted as accessory uses in conjunction with the pipeline installation, subject to the following conditions:
- a) The construction trailer shall be used as a temporary construction office only.
 - b) Neither sanitation facilities nor plumbed water is permitted within the trailer.
 - c) No overnight inhabitation of the construction trailer is permitted.
 - d) No construction trailers are permitted on site prior to building permit issuance.
 - e) The construction trailer shall be removed prior to issuance of a certificate of occupancy. (Planning)
4. AIR QUALITY MITIGATION 1 - BEST MANAGEMENT PRACTICES. The Coastside Fire Protection District shall monitor construction to ensure that the project implements the following Bay Area Air Quality Management District dust control measures during all phases of construction on the project site:
- a) Dust Control. Water all active construction areas twice daily or more often if necessary to control dust. Increased watering frequency shall be required whenever wind speeds exceed 15 miles-per-hour. Reclaimed water should be used whenever possible.
 - c) Trucks. Cover all trucks hauling soil, sand, and other loose materials or require all trucks to maintain at least two feet of freeboard (i.e. the minimum required space between the top of the load and the top of the trailer).
 - d) Site Sweeping. Sweep daily (with water sweepers using reclaimed water if possible) or as often as needed all paved access roads, parking areas and staging areas at the construction site to control dust.

- e) Street Sweeping. Sweep public streets daily (with water sweepers using reclaimed water if possible) in the vicinity of the project site, or as often as needed to keep streets free of visible soil material.
 - e) Stockpiles. Enclose, cover, water twice daily, or apply non-toxic soil binders to exposed stockpiles (dirt, sand, etc.).
 - f) Speeds. Limit vehicle traffic speeds on unpaved roads to 15 mph.
 - g) Visible Dust. Suspend construction activities that cause visible dust plumes to extend beyond the construction site.
 - h) Maintenance. Properly tune and maintain equipment for low emissions.
 - j) Construction Sign. Post a publicly visible sign with the telephone number and person to contact at the Coastside Fire Protection District and the City of Half Moon Bay regarding dust complaints. These persons shall respond and take corrective action within 48 hours. The BAAQMD's phone number shall also be visible to ensure compliance with applicable regulations.
5. HAZARDOUS MATERIALS. Any materials deemed hazardous by the San Mateo County Department of Health that are uncovered or discovered during the course of work under this permit shall be disposed in accordance with regulations of the San Mateo County of Health. (Building)
6. CONSTRUCTION MATERIAL STORAGE. Construction material and equipment shall not be stored in the street right-of-way without prior approval from the City Engineer. (Engineering)
7. ENCROACHMENT PERMIT. No construction activity shall occur and no pedestrian and vehicular traffic control shall be installed within the City right-of-way or affecting the City's improvements prior to obtaining an encroachment permit from the City. All improvements constructed within the City right-of-way shall conform to City standards to the satisfaction of the City Engineer. (Engineering)
- D. The following conditions shall be implemented prior to issuance of an occupancy permit:**
8. EXTERIOR COLORS AND MATERIALS. Exterior building materials and colors shall be as shown on the red brick and painted metal siding option as presented to the City Council on May 3, 2016, to the satisfaction of the Director of Community Development. (Planning)

E. Validity and Expiration of Permits

1. **EFFECTIVE DATE.** This site is not located within the Coastal Commission Appeals Jurisdiction; however, the project is a major public works project that is appealable to the Coastal Commission. This permit shall take effect after expiration of the Coastal Commission appeal period. (Planning)
2. **ACCURACY OF APPLICATION MATERIALS.** The permittee shall be responsible for the completeness and accuracy of all forms and material submitted for this application. Any errors or discrepancies found therein may be grounds for the revocation or modification of this permit and/or any other City approvals. (Planning)
3. **PERMIT EXPIRATION.** The Coastal Development Permit (CDP) shall expire one year from its date of final approval if development plans for a Building Permit have not been submitted. Once a Building Permit is issued, the CDP shall be deemed in effect. If plans for a Building Permit are submitted within the 1-year expiration period, and a Building Permit is not issued, the expiration of the CDP shall coincide and run concurrently with the Building Permit plan submittal/application as long as due diligence is pursued in the opinion of the Building Official in obtaining the Building Permit.
4. **PERMIT EXTENSION.** The Community Development Director may, at the Director's discretion, approve a single one-year extension of this permit based on a written request and fee submitted to the Director prior to expiration of the permit. Any other extension shall require approval of a Permit Amendment prior to expiration of the permit. Any Amendment Application to extend the permit shall be filed a minimum of ninety (90) days prior to permit expiration to ensure adequate processing time. (Planning)
5. **PERMIT RUNS WITH THE LAND.** The approval runs with the land and the rights and obligations thereunder, including the responsibility to comply with conditions of approval, shall be binding upon successors in interest in the real property unless or until such permits are expressly abandoned or revoked. (Planning)
6. **HOLD HARMLESS.** The permittee agrees as a condition of approval of this application to indemnify, protect, defend with counsel selected by the City, and hold harmless, the City, and any agency or instrumentality thereof, and its elected and appointed officials, officers, employees and agents, from and against an and all liabilities, claims, actions, causes of action, proceedings, suits, damages, judgments, liens, levies, costs and expenses of whatever nature, including reasonable attorney's fees and disbursements (collectively, "Claims") arising out of or in any way relating to the approval of this application, any actions taken by the City related to this entitlement, any review by the California Coastal Commission conducted under the California Coastal Act Public Resources Code Section 30000 et seq., or any environmental review conducted under the California Environmental Quality Act, Public Resources Code Section 210000 et seq., for this entitlement and related

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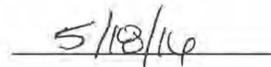
actions. The indemnification shall include any Claims that may be asserted by any person or entity, including the permittee, arising out of or in connection with the approval of this application, whether or not there is concurrent, passive or active negligence on the part of the City, and any agency or instrumentality thereof, and its elected and appointed officials, officers, employees and agents. The permittee's duty to defend the City shall not apply in those instances when the permittee has asserted the Claims, although the permittee shall still have a duty to indemnify, protect and hold harmless the City. (City Attorney).

OWNER'S/PERMITTEE'S CERTIFICATION:

I have read and understand and hereby accept and agree to implement the foregoing conditions of approval of the Coastal Development Permit.

APPLICANT:


(Signature)


(Date)



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COASTSIDE FIRE PROTECTION DISTRICT

1191 MAIN ST. HALF MOON BAY, CA 94019

TELEPHONE (650) 726-5213

FAX (650) 726-0132

June 9, 2016

Stephanie R. Rexing
District Supervisor
North Central Coast District
California Coastal Commission
Stephanie.Rexing@coastal.ca.gov

Re: **Coastside Fire Protection District Training Tower Coastal Commission Appeal No. A-2-HMB-16-0058, Local Government Application No. PDP-15-046**

Dear Ms. Rexing:

The Coastside Fire Protection District submits this letter and the enclosed materials for your review and consideration prior to making your staff recommendation to the California Coastal Commission on the above referenced matter. We respectfully urge you to recommend to the Commission that the appeal does not raise a Substantial Issue and therefore should not be heard de novo by the Commission for the reasons set forth below.

On June 3, 2016, the City Council of the City of Half Moon Bay ("**City**") -- by unanimous 5-0 vote -- upheld the January 26, 2016 Planning Commission approval of the District's proposed 4,497 sq.ft., graduated width, 45 ft. high fire training tower (the "**Project**") on a 86,463 sq.ft. previously developed, relatively flat lot located at 1191 Main Street (APN 06081-064370050) east of Highway 1 ("**Project Site**"). The Project Site is currently developed with an existing fire station and fire training yard.

Because the Project Site is on the east side of Highway 1 and is not located on tidelands, submerged lands, public trust lands, sensitive coastal resource area, or within 100 feet of any wetland, estuary or stream, the Project is appealable to the Coastal Commission only because it meets the definition of a "major public works" project pursuant to Coastal Act Section 30603 and defined by Public

Resources Code Section 13012(a) as “facilities that cost more than one hundred thousand dollars (\$100,000).”

Appellant argues that the Council approval should be set aside by the Commission because it is inconsistent with following policies of the City of Half Moon Bay (“City”) Local Coastal Program (“LCP”): (1) Land Use Plan Chapter 7; (2) Zoning Code Section 18.37.035C; (3) Land Use Plan Policy 7-10; (4) Zoning Code Sections 18.01.010 G; (5) Zoning Code Sections 18.37.010 A and E; and (6) Coastal Act Section 3025.

As explained in detail below, and as supported by the evidence in the record and the additional enclosed and referenced evidence, the Project is consistent with these LCP policies to the extent they apply to the Project.

1. **The Project is Consistent with Land Use Plan Chapter 7 to the Extent it Applies**

Appellant argues that the Project is inconsistent with the following section of the Land Use Plan (“LUP”) contained in Planning Section 7.1:

Upland Slopes

The hillside along the City's eastern boundary is a major attribute of the City's setting. Coordinated County and City measures to protect the scenic quality of these hillsides are necessary. The City has jurisdiction over hillsides on the Dykstra Ranch, Carter Hill, the Hester-Miguel lands, the Gravance property, and the land above the Nurserymen's Exchange. Any new development should be sited and designed to maintain the natural character of the landscape and to avoid substantial cuts and fills. Other policies in Sections 3 and 9 of the Plan will assist in achieving these purposes.

As further explained below, Appellant’s argument fails because this section of the LUP is designed to protect the eastern hillsides themselves and the Project is not located in the eastern hills.

The Upland Slopes section of the LUP states that measures to protect the scenic quality of the hillside along the City’s eastern boundary are necessary and then identifies certain hillsides that the City has jurisdiction over. The policy then states that any new development – in the identified hillsides listed – should be sited and designed to maintain the natural character of the landscape and to avoid substantial cuts and fills.

To implement this policy, the City adopted Zoning Code Section 18.37.035, which as discussed in detail below, protects the specified hillsides designated as visual resources on the LCP Visual Resources Overlay Map. The Project is on a relatively flat, previously developed site just 138 feet east of Main Street; it is not

located in the eastern hillsides or in any visual resource area depicted on the Visual Resources Overlay Map, and therefore is not subject to Zoning Code Section 18.37.035.

Nonetheless, in response to Planning Commission and community concerns, the District voluntarily revised the Project by reducing the height of the tower from 50 feet (which is permitted by the development standards for the project set forth Zoning Ordinance Chapter 18.09) to 40 feet with a 5 foot transparent railing. As evidenced in the attached rendering (Attachment 1) submitted into the record prior to the City Council decision, and in the enclosed additional photos (Attachment 2) and video submitted by separate email due to file size, the Project as revised further complies with the LUP Upland Slopes directive, to the extent it is applicable, to "maintain[s] the natural character of the landscape". Additionally, as the Project is a prefabricated structure that will be sited on a pre-existing concrete slab. As such, it "avoid[s] substantial cuts and fills" in compliance with the LUP Upland Slopes section, to the extent this section is applicable to the Project.

2. Zoning Code Section 18.37.035C is Inapplicable to the Project; Even if It Were Applicable, the Project is Consistent with this Section

Appellant argues the Project is inconsistent with Zoning Code Section 18.37.035C, set forth in full below, because the Project "would still project above the ridgeline skyline as seen from Highway 1". Appellant's argument fails for the reasons set forth below.

18.37.035 Upland slopes standards.



New development shall meet the following criteria:

- A. Grading or creation of a building site which results in significant alteration of the natural terrain shall not be allowed. Structures shall be subordinate in appearance to the natural land form and shall follow existing natural contours.
- B. Structures and roads shall be designed to fit the topography of the site with minimal cutting, grading, or filling for construction. Pitched, rather than flat roofs, which are surfaced with nonreflective materials except for solar energy devices shall be encouraged.
- C. Structures shall be sited so as to not intrude or project above the ridge line skyline as seen from Highways One and 92.
- D. Tree stands shall be preserved wherever possible. Where trees must be removed for building purposes, reforestation with indigenous or naturalized species shall be provided as part of new development in order to maintain forested appearance of the hillside.
- E. Structures shall be concentrated into clusters to preserve larger areas of open space.
- F. The padding or terracing of building sites shall be prohibited, unless it is determined that there are no feasible and reasonable alternatives.
- G. Within the Dykstra Ranch, Carter Hill and Nurserymen's Exchange planned unit development areas, no development shall occur above the one hundred sixty-foot contour line, nor on slopes of twenty-five percent or greater.
- H. No off-premises outdoor advertising shall be permitted. Other permitted signs shall be carefully designed and reviewed so that any negative visual impacts are minimized. (1996 zoning code (part)).

a. Section 18.37.035C is not Applicable to the Project

Reading Section 18.37.035C within the context of Chapter 18.37 as a whole, it is clear that Section 18.37.035C is not applicable to the Project. Chapter 18.37.015 states that "all new development projects within or adjacent to visual resource areas shall meet the visual resource standards established within this chapter." Section 18.37.020 then establishes five separately defined visual resource areas: Beach Viewshed Areas, Scenic Corridors, Upland Slopes, Planned Development Areas and Old Downtown, and requires that maps of all of these designated visual resources areas be prepared and maintained, based upon the visual resources overlay map contained in the City's local coastal program land use plan. It then goes on to define each of these distinct visual resource areas.

Zoning Code Section 18.37.020 (B), set forth in full below, defines Upland Slopes as follows:

B. Upland Slopes. Scenic hillsides which are visible from Highway One and Highway 92, as indicated on the visual resources overlay map. These areas occur include hillside areas above the one hundred sixty foot elevation contour line which are located:

1. East of the proposed Foothill Boulevard, comprising portions of Carter Hill and Dykstra Ranch properties.
2. Southeast of Pilarcitos Creek and east of Arroyo Leon, comprising a portion of land designated as open space reserve in the land use plan.
3. East of the Sea Haven Subdivision, being a portion of the Gravance property designated urban reserve in the land use plan.
4. East of the Nurseryman's Exchange properties and lower Hester-Miguel lands, comprising all of the upper Hester-Miguel lands designated as open space reserve in the land use plan.

The Project Site does not fall within the definition of Upland Slopes. It is not within a scenic hillside and it is not above the 160 ft. elevation contour line; it is on a relatively flat, previously developed lot. It is also not indicated on the visual resources overlay map which is attached as Appendix B to the Initial Study/Mitigated Negative Declaration prepared for the Project (the "**MND**"). As such, it is not located on an Upland Slope. Nor is it adjacent to an Upland Slope. Therefore, in accordance with Zoning Code Section 18.37.015, the Project is not subject to Zoning Code Section 18.37.035 which governs development of Upland Slopes.

As explained by City staff in its response prepared for the City Council appeal hearing, in Exhibit A to the March 1, 2016 Staff Report to the City Council ("**Staff Report**"), "Zoning Code Section 18.37.020B identifies upland slopes as scenic

hillsides visible from Highway 1 and 92 which include areas above the 160 ft. elevation contour line. Four specific upland slope areas are identified; the one closest to the project site is located "southeast of Pilarcitos Creek and east of Arroyo Leon." The project site is located over 1,200 feet west of Arroyo Leon and is flat. The site is not located on or adjacent to an upland slope and is not subject to the upland slope standards of Zoning Code Section 18.37.035." (Exhibit A to Staff Report, p. 4.)

Any conclusion to the contrary would conflict with the plain reading of Chapter 18.37 as a whole. Section 18.37.015 states that "new development projects within or adjacent to visual resource areas shall meet the visual resource standards established in this chapter." Section 18.37.020 then identifies five distinct visual resource areas and the rest of the chapter goes on to specify the visual resource standards for each identified visual resource. Staff points out that "[b]ased on the appellant's interpretation, development located in or adjacent to one [visual] resource area (such as the Old Downtown) would be subject to visual resource standards developed for another area (like a beach viewshed area or the Wavecrest PUD). This interpretation is illogical and would have significant implications far beyond this project." (Exhibit A to Staff Report, p. 3.) Indeed, if this were the intent of Chapter 18.37, then why would it bother to define the five different visual resource areas and specify distinctly different visual resource standards for each of the visual resource areas?

Moreover, as explained in the Initial Study/ Mitigated Negative Declaration prepared for the Project (the "MND"), the Project Site not only is not within the Upland Slopes visual resource area, it is not within any of the other four visual resource areas: "The Visual Resources Overlay Map from the Half Moon Bay Local Coastal Program is included as Appendix B of this Initial Study. As shown on the map, the closest identified visual resource to the project site (depicted with a red star) is "Old Downtown" located 0.6 mile, or eight blocks, from the project site...Other visual resources identified in Appendix B include ocean views from Highway 1 and scenic hillsides all of which are north of Old Downtown and therefore further away from the project site..." (MND, p. 25.) The MND concluded that the project as originally project (at 50 feet high) would have "a less than significant impact on all identified visual resources and would conform to the development standards contained in the [Zoning Code]." (MND, pp. 26-27.)

b. Even if 18.37.035C Were Applicable to the Project, the Project Complies

As demonstrated in the rendering submitted into the record prior to the May 3, 2016 City Council hearing and shown in Attachment 1, even if Section 18.37.035C applied to the Project, the Project complies with this section. As revised, the Project does not "intrude or project above the ridgeline skyline as seen from Highways 1 and 92."

Appellant alleges that the rendering "presents a misleading depiction of the tower's true height in relation to the ridge line skyline when seen from this and other parts of Highway 1." (Figure 2 to Appeal.) He argues that unlike as in Figure 1 attached to his appeal, "there are no height reference points (e.g. story poles) to verify the accuracy of the rendering... The story poles in Figure 1 indicate that the 45 ft. tower would continue to project above the ridge line skyline by about 10 feet when viewed from the western shoulder of Highway 1." (Id.)

We must first note that the accuracy of Figure 1 is not verified. According to Appellant, "Figure 1 shows a photo taken from the western shoulder of Highway 1 in January 2016. The photo shows the 50 ft. story poles erected by the applicant for the original design of the tower." Superimposed on this photo is a 35 ft. mark at the ridgeline and a 50 ft. mark at the top of one of the story poles. Nowhere in the appeal does it state how the 35 ft. reference point was measured and determined, who took the photo, and from what location and what height.

In response to Appellant's allegations, on May 25, 2016, the District and the District's architect sited a 43 ft. fire truck ladder as a reference point in the approximate location of the proposed Project (as demonstrated in the first Attachment 2-A and 2-B) and then took two photos (Attachment 2-C and 2-D) and shot the video I am emailing to you separately due to file size. The photo shown in Attachment 2-C was taken on southbound Highway 1 at Higgins Canyon Road. The photo shown in Attachment 2-D was taken approximately 500 feet north of that location along southbound Highway 1. The video, which will be submitted separately by email due to file size, was taken driving southbound along Highway 1 and then turning around and driving northbound on Highway 1. This additional supporting evidence clearly verifies the accuracy of the rendering shown in Attachment 1, thereby nullifying Appellant's challenge, and confirming that the Project does not "intrude or project above the ridgeline skyline as seen from Highways 1 and 92" as required by Section 18.37.035.

Even if the small portion of the upper story of the Project were to pop up above the ridgeline from certain vantage points along Highway 1, it would still be in substantial compliance with Section 18.37.035 due to the insignificant width of the tower (just 23 feet which is less than one-third the total width of the project) and the minimal visual disruption of the largely transparent railing. As pointed

out by Councilmember Ruddock at the May 3, 2016 hearing, even if Appellant's Figure 1 were accurate:

The actual tower that would project above the skyline is only about 23 feet wide. The rest of the building is 28 feet high or less. So most of the building, two-thirds of it, the vast majority, is not going to project over the skyline. So for much of your trip down Highway 1 or up Highway 1, it's not going to be visible above the skyline. It may at one or two points, but in general I'm thinking not. Therefore, I don't think there is a substantial issue there for the Coastal Commission. I think they are going to look at how much of the building protrudes above the skyline and for how much of the trip up and down Highway 1.

Councilmember Ruddock's conclusions are supported by the photos in Attachments 1 and 2 and the referenced video submitted separately.

It is also worth noting that an application to the City has been submitted for a 3-story, 41 ft. high, 148-room hotel project directly to the west of the Project (and shown in the video) which if approved, would completely obscure sight of the proposed Project from Highway 1 and therefore moot altogether the Project's compliance with Section 18.37.035.

3. Land Use Plan Policy 7-10 is Inapplicable to the Project; Even if it Were Applicable the Project is Consistent with this Policy

Without any explanation or support, Appellant complains that the Project is not consistent with Land Use Plan Policy 7-10 set forth in full below:

Policy 7-10:

New development on upland slopes visible from Highway 1 and Highway 92 as indicated on the Visual Resources Overlay Map, shall not involve grading or building siting which results in a significant modification of the hillscape; where trees must be removed for building purposes, reforestation shall be provided as a part of any new development to maintain the forested appearance of the hillside. Structures shall be subordinate in appearance to the natural landform, shall be designed to follow the natural contours of the landscape, and shall be sited so as not to intrude into the skyline as seen from public viewing places.

This policy applies to "new development on upland slopes visible from Highway 1 and 92 as indicated on the Visual Resource Overlay Map." As explained above in Section 2(a), the site is not located on or adjacent to an upland slope or any visual resourced indicated on the Visual Resource Overlay Map and therefore, the Project is not subject to Policy 7-10. As explained above in Section 2(b), even if this policy were applicable, as evidenced in the rendering enclosed in Attachment 1, the photos enclosed in Attachment 2, and the video submitted

separately, the Project complies with this Policy because it is "subordinate in appearance to the natural landform", is "designed to follow the natural contours of the landscape" and is "sited so as not to intrude into the skyline as seen from public viewing places."

4. The Project is Consistent with Zoning Code Section 18.01.010G to the Extent this Section Applies to the Project

Again, without any explanation or support, Appellant complains that the Project is not consistent with Zoning Code Section 18.01.010G set forth in full below:

18.01.010 Intent and purpose.



The overall intent and purpose of this title is to protect and promote the public health, safety and general welfare, to implement the policies of the general plan, as provided in the California Government Code, Title 7, Chapters 3 and 4, and in the California Constitution, Chapter 11, Section 7, and to put the goals and policies of the land use plan and the Coastal Act of 1976 into effect. More specifically the zoning ordinance is intended to:

- A. Guide, control and regulate the future growth of the city;
- B. Prevent excessive population densities and overcrowding of land and buildings;
- C. Protect the character and social and economic stability of agricultural, residential, commercial, industrial and other public and private areas within the city;
- D. Provide adequate light, air, privacy and access to property;
- E. Ensure that service demands associated with new development not exceed the capacity of existing streets, utilities or other public services;
- F. Conserve and enhance the city's architectural, historical and cultural resources;
- G. Conserve and enhance important visual resources within the city, including views from Highway 1 of the Pacific Ocean and coastal beaches and bluffs, the visual character of the old downtown area, and views of the inland hillsides at the eastern edge of the city; and
- H. Protect, conserve and, where possible, restore natural environmental resources within the city. (1996 zoning code (part)).

Zoning Code Section 18.10.010 sets forth the intent and purpose of the Zoning Code as a whole. With respect to subsection G, and as explained in detail in Section 2 above, the Project does not hinder the Zoning Code's intent to "conserve and enhance important visual resources within the city." As stated in Exhibit A to the Staff Report, "[t]he proposed training tower will be visible from Highway 1, but is not expected to be visually intrusive or to significantly obstruct views of the hillsides due to the structure's relatively small size, its distance from Highway 1, the remaining open area on the parcel, and the screening provided by existing street trees on either side of Main Street." (Exhibit A to Staff Report, p. 4.) As such, the Project is consistent with Zoning Code Section 18.10.010G.

5. The Project is Consistent with Zoning Code Section 18.37.010

Again, without any explanation or support, Appellant complains that the Project is not consistent with Zoning Code Sections 18.37.010A and E set forth in full below:

18.37.010 Purpose and intent.

The specific purpose and intent of these visual resource protection standards are to:

- A. Protect the scenic and visual qualities of coastal areas as a resource of public importance.
- B. Ensure that new development is located so as to protect views to and along the ocean and scenic coastal areas.
- C. Minimize the alteration of natural land forms.
- D. Restore and enhance visual quality in visually degraded areas.
- E. Allow development only when it is visually compatible with the character of the surrounding areas. (1996 zoning code (part)).

The Project is consistent with Section 18.37.010A as it does not hinder the intent to "protect scenic and visual qualities of coastal areas as a resource of public importance." As explained above, the Project Site is not located within or adjacent to a visual resource area and because it does not substantially protrude above the eastern hillside ridgeline it does not hinder the scenic and visual quality of this visual resource area.

The Project is also consistent with Section 18.37.010E because it is "visually compatible with the character of the surrounding areas." As explained in Exhibit A to the Staff Report and the MND, the Project is visually compatible with Fire Station 40, the existing fire station on the Project Site, and the Coastal Repertory Theatre, an industrial building with a domed roof, and a residential development located further north consisting of two story buildings with pitched roofs. (Exhibit A to Staff Report, pp. 4-5, 6-7; MND pp. 27-28.)

6. The Project is Consistent with Coastal Act Section 30251

Again, without any explanation or support, Appellant complains that the Project is not consistent with Coastal Act Section 30251 set forth in full below:

Section 30251 Scenic and visual qualities

The scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance. Permitted development shall be sited and designed to protect views to and along the ocean and scenic coastal areas, to minimize the alteration of natural land forms, to be visually compatible with the character of surrounding areas, and, where feasible, to restore and enhance visual quality in visually degraded areas. New development in highly scenic areas such as those designated in the California Coastline Preservation and Recreation Plan prepared by the Department of Parks and Recreation and by local government shall be subordinate to the character of its setting.

As indicated above and as concluded by City staff, the Project is consistent with this section because "it will not negatively impact a visual resource area, will not significantly block views of the hillsides, and is reasonably compatible with adjacent development." (Exhibit A to Staff Report, p. 7.)

In closing, the Coastside Fire Protection District addressed citizen and Council concerns by reducing the Project height and incorporating a brick building façade. While the reduced height does compromise the functionality of the Project to some extent, it will still be able to serve the Project's purpose of providing on-site training for the fire fighting staff. The City Council heard and considered all the testimony and evidence in the record, made all the necessary findings and conditions regarding this Project, and approved the Project with a unanimous 5-0 vote. For the foregoing reasons, and as supported by the evidence in the record and the additional material enclosed and referenced in this letter, we agree with Councilmember Ruddock that this Project as revised does not meet the test of Substantial Issue and hope you will reach the same conclusion.

Many thanks for your consideration.

Respectfully submitted,



Camas J. Steinmetz
Deputy District Counsel

Cc: Nancy Cave, District Manager
Robin Mayer, Coastal Commission Legal Counsel
Patrick Foster, Coastal Planner

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ATTACHMENT 2A



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ATTACHMENT 2B

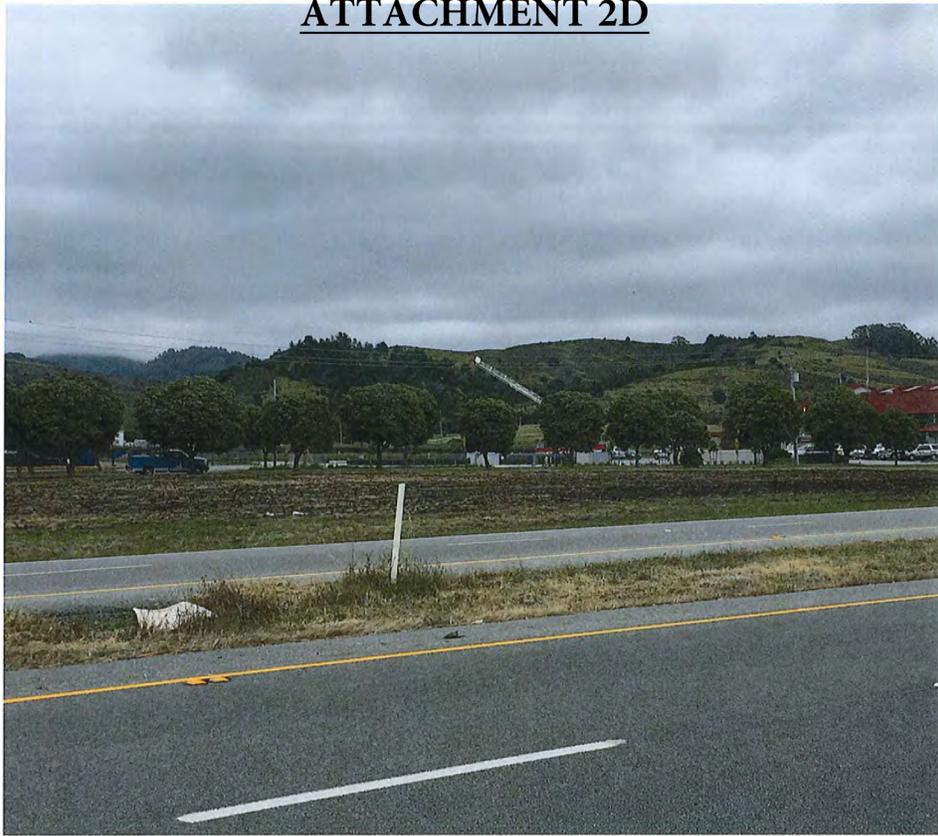


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ATTACHMENT 2D



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From: Dave Schorr [mailto:davetreas@gmail.com]
Sent: Thursday, July 21, 2016 12:52 PM
To: Foster, Patrick@Coastal
Subject: Half Moon Bay Fire Tower Appeal

Dear Mr. Foster;

I am a resident of half Moon Bay. I am writing in support of the appeal filed by Mr. Lansing with respect to the proposed fire training tower.

For purposes of your proceedings, we will leave aside prior errors by the Fire District and the City, with regards to effectively (or not) analyzing potential impacts, compliance with CEQA, piecemealing of this project, etc.

At issue here is the impact of the proposed development upon visual resources as viewed from within the city of Half Moon Bay, and as viewed from a prominent and delineated view corridor, that of State Highway 1.

The intent of the Coastal Act and the LCP as adopted by the City is to preserve and protect the visual resources of this most beautiful area. At issue between the appellant and the project applicant has been an interpretation of portions of the LCP, trying to settle the point of whether or not this parcel is subject to visual resource protections which clearly pertain to upland slope areas, but by intent, would logically also pertain to views of those upland slopes and the associated ridgeline profile as viewed from Highway 1.

It is not debated, even by the City, that the proposed fire tower at either 45 or 50 feet of height, would protrude above the ridgeline, as viewed from Highway 1. It would seem that this is a clear violation of the letter and intent of Coastal Act, and in and of itself sufficient grounds to deny the project as currently proposed.

The nature and character of the proposed development is not consistent with the scenic and rural nature of the area.

I must address the way in which the project applicant has presented this project, with deliberate attempt to minimize all appearances of negative visual impact, both with regards to aesthetics and height/intrusion upon the ridgeline profile.

The drawings submitted as renderings of the proposed project greatly minimize the negative aesthetic qualities of prefabricated buildings from the same manufacturer currently installed elsewhere. As opposed to the drawings which present a relatively clean structure, the structure in reality is festooned with exterior, steel, galvanized stairways and landings, giving it a highly industrial, unsightly appearance.

But, the major issue here is the height of the building, and the precise extent to which it does protrude above the inland hill ridgeline when viewed from Highway 1.

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In this regard, the project applicant has significantly and consistently gamed the system. All photographs and renderings provided have been given from the perspective of the viewer on the southbound side of Highway 1, looking towards the hills. Unfortunately, you can't argue with geometry. Take the same viewer, and place them on the northbound side of Highway 1, approximately 100 feet closer to the proposed project site, and intrusion upon the ridgeline is much more pronounced.

The story poles erected by the applicant were not in conformity with existing city code and standards, and did not adequately outline the parameters of the structure. As well, they have now been taken down, so no further analysis of visual impact can be done at this point in time.

Given the above two points, I most strongly urge the Coastal Commission to defer any judgment upon this matter until direct inspection of the proposed site and its impact on the visual resources can be made by Coastal Commission staff, as evidence submitted by the applicant to date is unreliable and biased.

This would require the applicant to reinstall the story poles, with all required flagging, and I would suggest with the additional component of marking 5 foot height increments on the poles as they ascend, for easier comparison with the background ridgeline, as viewed from various vantage points.

It is only with these physical components reinstalled, that Commission staff could then make a site visit and make objective and conclusive determination as to the maximum height permissible for this project which would not intrude upon unimpeded view of the inland hill ridgelines.

Currently, heading north on Highway 1, the visitor experiences a view of expansive fields, with low-lying structures of the City not disrupting views of the hillsides. There would be a very different experience should this project be allowed to proceed.

A very real and significant danger is the precedent that this project, if unmodified, would present. Allowing violation of the ridgeline profile by this project would inevitably be cited as precedent by subsequent developers, leading to incremental but irreversible and irreparable damage to our precious visual resources.

Please consider these comments and suggestions in preparing your staff report and making any further determinations.

Please do not hesitate to contact me with any questions, or requests for clarification.

Sincerely,

David Schorr
650-726-2842

CALIFORNIA COASTAL COMMISSION

NORTH CENTRAL COAST DISTRICT OFFICE
45 FREMONT ST, SUITE 2000
SAN FRANCISCO, CA 94105-2219
VOICE (415) 904-5260
FAX (415) 904-5400
TDD (415) 597-5885



Memorandum

August 9, 2016

To: Commissioners and Interested Parties

FROM: Dan Carl, North Central Coast District Deputy Director
North Central Coast District

Re: **Additional Information for Commission Meeting
Thursday, August 11, 2016**

<u>Agenda Item</u>	<u>Applicant</u>	<u>Description</u>	<u>Page</u>
Th21a	Marin Co. LCP Amend. LCP-2-MAR-15-0029-1	Correspondence, Morgan Patton / Ashley Eagle-Gibbs	1-3
		Correspondence, Amy Trainer, Scotty Tye & John Sharp	4-5
		Email, Robert A. Johnston	6-8
		Correspondence, Kathleen Hartzell	9-10
		Email, Bridger Mitchell	11-12
		Email, Toby Symington	13-14
		Email, Cynthia Lloyd	15-16
		Email, Lawrence Litvak	17
		Correspondence, Conn Rusche	18-19
		Email, Sharon Barnett	20
		Correspondence, Kenneth Drexler	21
		Correspondence, Jessica Reynolds-Taylor	22-23
		Correspondence, Carolyn Longstreth	24-25
		Email, Victoria Hanson	26-28
		Email, Ann W. Baxter	29-31
		Email, Daniel Dietrich	32-33
		Email, W. Edward Nute	34-35
Email, Mary Barone	36		
Email, Corey Barnes	37		
Email, Dawn Ward-Doma	38		
		Correspondence, Bridger Mitchell	39-41
Th22a	Coastside Fire Protection District A-2-PAC-16-0058	Correspondence, Kevin J Lansing	42
Th22b	Steve Kalpakoff A-2-SMC-16-0066	Correspondence, R. Rexford Upp	43-47

Note: 113 email comments substantially identical to this email comment were received. This email comment is provided as a representative sample of the 113 email comments. All of the 113 email comments substantially identical to this email comment are available for review at the Coastal Commission's North Central Coast Office in San Francisco.

Th22a

August 8, 2016

Agenda Item Th22a (Lansing)

Steve Kinsey, Chair & Members of the California Coastal Commission
c/o North Central Coast District Office
45 Fremont Street, Suite 2000
San Francisco, CA 94105-2219

Subject: Appeal A-2-HMB-16-0058

Dear Chair Kinsey and Members of the Commission:

As a representative of the appellant group (Citizen for Preserving Rural Half Moon Bay), I appreciate the opportunity to comment on the staff's recommendation regarding our appeal. Work commitments prevent me from attending the hearing in person.

The following key excerpts from the staff report show that *the local decision by the City of Half Moon Bay was not consistent with the City's certified Local Coastal Program (LCP)* because the City based its approval on the incorrect claim that the visual resource protection policies in LCP Policy 7-10 and IP Sections 18.01.010(G) and 18.37.035(C) do not apply to this project. The staff report contradicts the City's interpretation of the certified LCP.

The issues raised in this appeal extend beyond the current project. If the City's interpretation of the LCP goes unchallenged, it will set a bad precedent for future projects that have potential to permanently degrade scenic views of the City's eastern hills as seen from Highway 1. **Therefore, I urge the Commission to support a finding of Substantial Issue on our appeal.**

Key excerpts from Commission staff report that support a finding of Substantial Issue:

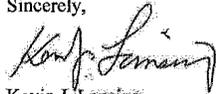
"Although the City-approved project is not located on an upland slope, that does not mean that the ridgeline protection policies don't apply. Indeed, the LCP intent is to protect the views of the eastern hillsides, including avoiding development that projects above the ridgeline (see, for example, LUP Policy 7-10 and IP Section 18.01.010(G) cited above)."

"[T]he LCP intent is clear in that it means to protect the scenic quality of the hillsides along the City's eastern boundary, and it would be inappropriate (and not protective of this resource) to try to imply only certain such views are protected, and others not, because of mapping inadequacies."

"Therefore, the approved project is inconsistent with the standards set forth in LCP Policy 7-10 and IP Section 18.37.035(C), both of which require structures to be sited so as not to intrude into, or project above the eastern ridgeline as seen from Highway 1."

"In essence then, the City-approved project is technically inconsistent with the ridgeline view protection policies and some of the Highway 1 corridor protection policies."

Sincerely,



Kevin J. Lansing
President, Citizens for Preserving Rural Half Moon Bay
359 Filbert Street
Half Moon Bay CA 94019



CITY OF HALF MOON BAY

Office of the City Attorney
PO BOX 481, Santa Cruz, CA 95061-0481
Telephone: (831) 423-8383
Fax: (831) 576-2269

Th22a

August 10, 2016

California Coastal Commission
45 Fremont Street, Suite 2000
San Francisco, CA 94105

RE: Appeal No. A-2-HMB-16-0058 (August 11, 2016—North Central Coast)

Dear Commissioners:

I am writing today on behalf of the City of Half Moon Bay, in support of the above-listed project, a prefabricated fire training tower proposed by the Coastside Fire Protection District (CFPD), which was approved on appeal by the Half Moon Bay City Council. This project is critical to the CFPD's mission *and* to Half Moon Bay's residents, its visitors, and the local businesses that depend on a well-trained fire staff, who risk their own personal safety to protect lives and property each day. For that reason, it is the City's sincere hope that the Commission will make a determination of "No Substantial Issue" to allow this project to proceed.

Nevertheless, and although the City supports the project and urges the Commission to find "No Substantial Issue," **the City must note for the record that the Coastal Commission staff report incorrectly concludes that several Visual Resources Protection Standards of the Half Moon Bay Local Coastal Plan (LCP) apply to the project at issue, and that the project is inconsistent with those standards.** In particular, the report identifies two standards which, in the opinion of Coastal Commission staff, apply to the project. Those are:

1. Upland Slopes - Half Moon Bay Municipal Code (HMBMC) section 18.37.035, and
2. Scenic Corridor - HMBMC Section 18.37.030

Applying those standards to the project, Coastal Commission staff found the City-approved project was inconsistent with City's LCP, yet recommended a "No Substantial Issue" determination. As explained below, Coastal Commission staffs' conclusions as to the application of those standards are misplaced and unsupported – neither of the identified standards applies to the project, and the project is wholly consistent with the City's LCP. In order to correct the record, provide a complete analysis of the relevant policies and ordinance provisions,

California Coastal Commission
August 10, 2016
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and to establish a legally defensible foundation for the applicability – or lack thereof – of such standards to future projects, the City is submitting the following comments.

A. THE UPLAND SLOPES STANDARD (HMBMC § 18.37.035) DOES NOT APPLY TO THE PROJECT.

As a preliminary matter, the question of whether any Visual Resource Standard applies to any project is governed by the applicability section of the ordinance, which requires all new development projects within or adjacent to visual resource areas to meet the visual resource standards in Chapter 18.37.¹ As it relates the CFPD fire training tower project, the staff report concluded that the City’s “Upland Slopes” standard applied to the project, and therefore extrapolated that any of the project’s proposed structures could not intrude or project “over the ridge line skyline as seen from Highways One and 92.”

However, Coastal staff’s conclusion as to the applicability of the standard was supported by an incomplete analysis of relevant LUP policy language and IP/ordinance language, both of which are addressed in turn below. As the City will show, the project is not located within or adjacent to an Upland Slope, and so that standard simply does not apply.

1. LUP Policies Do Not Support Application of the “Upland Slopes Standard” to the Project.

To support the application of the Upland Slopes standard, Coastal Commission staff cited the City’s Land Use Plan (LUP), page 90² “Upland Slopes,” which, in the staff report, reads as follows:

“The hillside along the City’s eastern boundary is a major attribute of the City’s setting. Coordinated County and City measures to protect the scenic quality of these hillsides are necessary... Any new development should be sited and designed to maintain the natural character of the landscape and to avoid substantial cuts and fills.”

Notably, in its recommendation to the Commission, Coastal Commission staff omitted a material part of the actual LUP policy language (in the form of an ellipses, using “...” to replace language undercutting the foundation of the argument.) In its entirety, the policy provides:

“The hillside along the City’s eastern boundary is a major attribute of the City’s setting. Coordinated County and City measures to protect the scenic quality of these hillsides are

¹ HMBMC § 18.37.015 “Applicability.”

² This citation is inaccurate; the correct citation is LUP Page 87.

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necessary. *The City has jurisdiction over hillsides on the Dykstra Ranch, Carter Hill, the Hester-Miguel lands, the Gravance Property, and the land above the Nurserymen's Exchange. Any new development should be sited and designed to maintain the natural character of the landscape and to avoid substantial cuts and fills.*" (omitted language shown in italics.)

This omitted language provides context for the LUP's discussion and intended application of the City's Upland Slopes standards – *namely, to new/proposed development located on or adjacent to upland slopes within the City's jurisdiction.*³ And, under the ordinance's applicability provision, the project is *not* located on, or adjacent to, any upland slopes – meaning the standard would not apply. This omission eliminated necessary context for the Commission's considerations of the policies and presented an incomplete and inaccurate analysis of the issues.

2. The Implementation Plan Does Not Support Application of the "Upland Slopes Standards" to the Project.

Moreover, and setting LUP policies aside, the reasonable reading of the letter of the law (i.e. the language of the City's implementation plan, HMBMC Title 18, the "Zoning Ordinance," and the Coastal Commission-approved LCP embodied therein) establishes that the Upland Slopes standard *does not apply* to the project. While the staff report cites to HMBMC's broad "purpose and intent" provisions, the same staff report ignores clear statutory language which points to the contrary. Ultimately, the conclusion that the project is subject to and inconsistent with the Upland Slopes standard is incorrect.

i. The Definition of "Upland Slopes" Excludes the Project.

As a threshold matter, HMBMC § 18.37.020, *defining* Visual Resource Areas, provides the following in regards to Upland Slopes, at 18.37.020(B):

"Upland Slopes. Scenic hillsides which are visible from Highway One and Highway 92, as indicated on the visual resources overlay map. These areas occur in hillside areas above the one hundred sixty foot elevation contour lines which are located:

1. East of the proposed Foothill Boulevard, comprising portions of Carter Hill and Dykstra Ranch Properties.
2. Southeast of Pilarcitos Creek and east of Arroyo Leon, comprising a portion of land designated as open space reserve in the land use plan.

³ See LUP Policy 7-10.

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3. East of the Sea Haven Subdivision, being a portion of the Gravance Property designated urban reserve in the land use plan.
4. East of the Nurseryman's Exchange properties and lower Hester-Miguel lands, comprising all of the upper Hester-Miguel lands designated as open space reserve in the land use plan."

Thus, as defined by the LCP under the law – and consistent with the LUP policies – “upland slopes” are areas *above 160 feet in elevation located around Carter Hill, the Dykstra Ranch, the Gravance Property, the Hester-Miguel lands, and above the Nurseryman's Exchange*, as indicated on the visual resources overlay map. The CFPD fire training tower is *not* located in or adjacent to any of the aforementioned areas; thus, the upland slopes standard does not apply.

ii. Express Provisions of 18.37.035 “Upland Slopes” Counsel Against Application of the Standard to the Project.

Nevertheless, and while acknowledging the project is not located on an Upland Slope,⁴ the staff report isolates HMBMC § 18.37.035(C) [an upland slope standard] and argues that it *still* applies to the project, requiring the fire tower be built so as not to intrude/project above the ridge line when viewed from either Highway 1 or 92. However, when considered in its entirety, the reasonable interpretation of HMBMC § 18.37.035 is that it was *not* intended to apply to projects like the fire tower, which are located on flat land, neither on or adjacent to upland slopes. For example, consider the additional, omitted provisions of HMBMC § 18.37.035:

- “Subsection A prohibits grading or creation of a building site which results in significant alteration of the natural terrain (not found in projects on flat land), and mandates structures be subordinate to the natural land form and follow existing natural contours (contours exist on rolling hillsides, not flat land).
- Subsection D provides that, if trees are removed for building, reforestation ‘shall be provided as part of new development order to maintain forested appearance of the hillside’ – here, the ordinance speaks of *hillsides*, not flat land on Main Street.
- Subsection F provides that ‘padding or terracing of building sites shall be prohibited,’ a construction feature only necessary for projects on slopes and hillside areas.
- Subsection G directly notes that ‘within Dykstra Ranch, Carter Hill, and Nurserymen’s Exchange planned unit development areas, no development shall occur above the one hundred sixty-foot contour line, nor on slopes of twenty five percent or greater.’”

⁴ Coastal Commission Staff Report, pg. 10, ¶4 [“Although the City-approved project is not located on an upland slope...”]

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Ultimately, upon a full and measured examination of the LUP policies and the IP/HMBMC, the correct conclusion is that the Upland Slopes standard simply does not apply to the project. Thus, there is No Substantial Issue that can be found.

B. THE SCENIC CORRIDORS STANDARD (HMBMC § 18.37.030) DOES NOT APPLY TO THE PROJECT.

The Coastal Commission staff report further incorrectly asserts that, because the project is within 200 yards of Highway 1, it automatically falls within a HMBMC Visual Resource Area - the “Highway One Corridor” subsection of “Scenic Corridors”- and is therefore subject to the standard and a concurrent 28-foot building height limitation. This conclusion is also incorrect.

1. As Defined, the Project is not within the “Highway One Corridor” Visual Resource Area.

Under HMBMC § 18.37.020(A)(1), the “Highway One Corridor” is defined as those spaces:

“located on both sides of Highway one, for a distance of two hundred yards *in those areas where Highway one is designated as a scenic highway by the state of California and in those areas shown on the visual resources overlay map* in the city’s local coastal program land use plan.” (emphasis added to omitted language.)

To conclude the project is within the “Highway One Corridor” because it is within 200 yards of Highway 1, the Coastal Commission staff report ignored the second half of the one sentence definition. However, this second half is material to the definition, and provides a qualifier, to wit: “...in those areas where Highway One is designated as a scenic highway by the state of California and in those areas designated on the visual resources overlay map...”

Highway 1 is not designated a scenic highway within the City of Half Moon Bay by the state of California. Additionally, this portion of Highway 1 is not designated a visual resource area on the City’s adopted visual resource overlay map. Accordingly, the project is not within the “Highway One Corridor.”

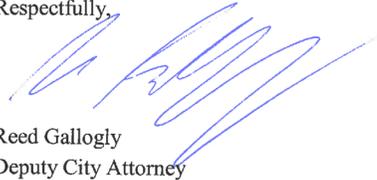
Moreover, *even if it were*, Coastal Commission staff is further incorrect in asserting that a 28-foot height restriction would apply to the project. That height restriction is found under HMBMC § 18.37.030(A) - development standards applicable to the “Broad Ocean View” Visual Resource Areas subcategory, not under HMBMC § 18.37.030(B) – development standards for the “Highway One Corridor” Visual Resource Area subcategory.

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C. CONCLUSION

As noted at the outset, the City urges the Commission to find “No Substantial Issue” in this matter. It is in the best interests of the CFPD and the citizens of the Coastside. The purpose of this comment letter is simply to correct the record and ensure that future public and private projects are held to LCP Policies adopted by the Half Moon Bay City Council, certified by the Coastal Commission, codified under HMBMC Title 18, and actually applicable under the law. Prospectively, leaving these facts unstated could result in further confusion by the public as well as appeals to the City Council and Coastal Commission based upon inaccurate interpretation of City LCP policies.

Respectfully,



Reed Gallogly
Deputy City Attorney

cc: City Council
Planning Commission
Coastside Fire Protection District
City Manager

COMMENTS ON
DRAFT ENVIRONMENTAL IMPACT REPORT
HALF MOON BAY
HYATT PLACE PROJECT (Volume I)
State Clearinghouse No. 2018032059
City File Number: PDP 072-13

Submitted by David Schorr, Half Moon Bay homeowner, taxpayer and resident

September 13, 2022

Appendix D

PHOTOS FOLLOWING

C-83.107

All photos are taken from raw images of approximately 3 MB size each, compressed by 90% to avoid clogging this document badly. The originals are available upon request. Each photo will be accompanied by narrative text, as I do not have the skills or tools to make drawings or notations directly on the images. Photos taken August 23, 2022, using an iPhone. No editing, or retouching was done to any of these photos.

These photos are meant as supplement to materials presented in the Draft EIR. While not prepared by a professional or consultant, I attest that they are true and representative of site conditions both baseline and with project superimposed, and are here submitted for review as part of comments on the Draft EIR, and for further consideration by Staff and Planning Commissioners.



C-83.108 | Photo roughly at southern corner of existing Ford dealership, looking across the site from southbound Highway 1. Note that existing trees and structures occlude significantly less than 50% of the background hills. Note the most eastern story poles, visible as vertical lines protruding above the power lines and surrounding structures, with a thin white line connecting those eastern story poles, depicting that the 102 room alternative would completely block view of hills and ridgelines from this vantage point, which was not considered in the Draft EIR.



C-83.109 | Preceding photo taken from southbound lanes of Route 1, opposite Main Street housing. Trees and existing structures block no more than 50% of background hillsides. Project story poles project above the existing Ridgeline at 2 to 3 times the height of the foreground trees, completely blocking views of hills and ridgelines from this aspect.



C-83.110 | View from southbound lanes, further south along the subject parcel, but still north of chosen Viewpoints 2 and 3. Looking towards the theater, existing trees and structures block 50% or less of existing intervening ridgelines, distant hills and distant ridgelines. Story poles representing the southern building of the hotel rooms protrude above ridgeline, at approximately twice the height of the foreground trees. Story poles indicating building outline protruding well above the currently clearly visible inland hillsides and ridgelines.



C-83.111 | Similar view from southbound Highway 1, story poles for the southern hotel building protruding well above the currently clearly visible inland hillsides and ridgelines.



C-83.112

View from northbound side of Highway 1, landscaping visible indicates location approximately in area of chosen Viewpoint 3, but just a few yards north of Viewpoint 3. Here you can see that standing anywhere north of Viewpoint 3 shows blockage including the ridgeline, and prominent blockage of views of distant hills – both aspects of the vista (ridgeline and hills/slopes) are unambiguously protected by Code and Policy. From this aspect, foreground trees and existing structures block only a very small portion of the dominant view shed of distant scenic hillsides, so the intrusion depicted by the story poles will be quite noticeable and a very impactful change from current baseline conditions.

It is also notable that this photo taken with regular iPhone lens, gives a more true-to-life impression of the prominence of the hills to the north, which are quite striking and prominent. By comparison, the photos and simulations in the Draft EIR seem to flatten the aspect ratio, such that the hills appear much less prominent, even in baseline undisturbed condition.



C-83.113 | Continuing to move progressively northward from the shoulder of northbound Highway 1, as one proceeds north, the visual impacts of the project in the foreground increase relative to their impact on the background hills.



C-83.114 | Similar viewpoint to previous photo, zoomed in slightly to better approximate the impact on the naked eye, in real time. Note again that foreground trees and structures cover less than 50% of the existing views of the hillsides, whereas the story poles and connecting ribbons intrude significantly. Note the most rearward story pole, dark in color, reaches almost to the ridgeline, with roofline profile extending to the left and further upwards, blocking more of the distant and very prominent distant hills and even there ridgeline, represented by the thin white line extending left and upwards on an angle.



C-83.115 | Continuing further north across the frontage of the project, this is quite representative of a slight oblique view for a driver or passenger transiting the site. Foreground foliage obscures less than 50% of the ridgeline for the bulk of this photo, with the viewshed of the distant hills a defining feature of this approach into Half Moon Bay, as noted by the City's policy documents, and Coastal Commission communication. By contrast, story poles triple the height of the foliage, and protrude significantly above the ridgeline, completely blocking views of the hills. I was not standing in the field or on the parcel to take this photo, it is from the side of the northbound lanes, immediately to the right of the white stripe. This is a true representation of the visual impact of the project upon baseline conditions.

Response to Commenter Letter C-83: David Schorr

C-83.1 CEQA Guidelines Section 15126.6 governs the identification and analysis of alternatives in an EIR stating, “[a]n EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project and evaluate the comparative merits of the alternatives.” The EIR should also briefly describe the rationale for selecting the alternatives to be discussed. As explained in Draft EIR Chapter 5.0, Section 5.4 (Alternatives Considered but Rejected for Further Analysis), the City considered several development scenarios that were rejected by either the City or the applicant because they did not meet the project objectives.

Pursuant to CEQA Guidelines Section 15126.6 (f), “[t]he alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the project. The range of feasible alternatives shall be selected and discussed in a manner to foster meaningful public participation and informed decision making.” In addition, the EIR is required to analyze a No Project alternative pursuant to CEQA Guidelines Section 15126.6 (e).

Alternatives 2 and 3 were developed to provide a range of reasonable alternatives that meet the City’s and applicant’s project objectives and reduce significant impacts associated with the project in accordance with the requirements of CEQA. Following circulation of the Draft EIR, the applicant submitted revised plans to the City indicating that Alternative 2 (with revisions), is now the Proposed Project that would be considered for approval. This Proposed Project is described in the Final EIR as Modified Alternative 2. The Original Project as evaluated in the Draft EIR, is not changed. For a more detailed description of the revisions included in Modified Alternative 2, please see the text revisions in Appendix 3.0-A, Attachment to EIR Text Revisions, of the Final EIR.

The commenter is correct that the City and the project applicant have been engaged in public outreach to increase public input regarding the potential to revise the project in order to reduce impacts. Through that process, the applicant refined Alternative 2 from the Draft EIR and proposed Modified Alternative 2 as the project that the applicant would like considered by the City for approval. Accordingly, Modified Alternative 2 is evaluated in the Final EIR. The other alternatives analyzed in the Draft EIR are the No Project alternative (see Draft EIR Section 5.5.1), and Alternative 3 (Multi-Family Residential), which is analyzed in Section 5.5.3. Modified Alternative 2 and Alternative 3 were analyzed using quantitative analyses similar to the project, such as generation of visual simulations and air quality, noise, and traffic analysis, at the same level of detail as the project.

C-83.2 Please see Topical Response 2, Aesthetics, regarding impacts to scenic resources, vistas, and corridors.

As shown in Appendix 3.0-A, Attachment to EIR Text Revisions, of the Final EIR Table 5-2 provides a comparison of impacts between project alternatives. The less than significant determination for visual impacts related to an adverse effect on a scenic vista is based on the analysis of the information presented in Section 5.5.2, Reduced Intensity, Modified Alternative 2. As described in Chapter 5.0, Alternatives, of the Draft EIR, building setbacks from the southern gateway, Main Street, and SR-1 would each be substantially increased under Modified Alternative 2. In addition, Modified Alternative 2 would increase the space between the hotel buildings from 16 feet in Alternative 2 to 32 feet. Therefore, Modified Alternative 2 would have a less-than-significant impact on protected scenic vistas and scenic resources within a scenic corridor that are available from Viewpoints 2 and 3, compared to the Original Project, which would have a significant and unavoidable impact from Viewpoint 3 due to the overall massing and scale of the project. In Modified Alternative 2, the north building would be constructed parallel to the northern property line of the project site with the building's longer side aligned in an east-west direction; therefore, the view of the ridgeline from Viewpoint 4 would still be obstructed by Modified Alternative 2, but less than the project. Viewpoints 1 and 4 are not protected views according to the City's LCLUP; however, they were evaluated due to community interest (See Appendix 3.0-A, Attachment to EIR Text Revisions, of the Final EIR, Figures 5-8 through 5-11).

While Modified Alternative 2 would reduce impacts to scenic vistas and scenic resources, Modified Alternative 2 would result in permanent changes in the existing visual quality of the project site as demonstrated in the analysis of Viewpoints 1 and 4. Although the Original Project and Modified Alternative 2 would incorporate high quality design elements, landscaping, and screening techniques, the visual quality of the project site from public views is conservatively considered to be adversely affected by the both the Original Project and Modified Alternative 2. Therefore, Modified Alternative 2 would substantially degrade the existing visual quality of the project site from public views and this impact would be significant and unavoidable, similar to the Original Project, although to a lesser extent than the Original Project due to the significant reduction in the hotel building's size and massing.

C-83.3 Please see Topical Response 2, Aesthetics, regarding scenic views, vistas, and corridors.

The baseline, referred to as the "existing conditions" in the Draft EIR, that is used in the analysis of Modified Alternative 2 is the same baseline used for the Original Project, which includes existing conditions at key viewpoints from various vantage points. Site plan design, viewer concerns, visibility, number of viewers, and duration of view are also considerations. Section 4.1.2, Existing Conditions (page 4.1-2 of the Draft EIR),

describes the regional setting and visual resources that the EIR uses as the baseline for aesthetic impacts. Based on the location of the site, Modified Alternative 2 would not obstruct ocean views, which is consistent with LCLUP Policy 9-2. The site also is not within a visually degraded area. Modified Alternative 2 was found to not impact protected views of the ridgelines as demonstrated from Viewpoints 2 and 3. Therefore, Modified Alternative 2 would be consistent with LCLUP Policy 9-2, where the Original Project would be inconsistent. Nevertheless, the impact on the existing visual quality of the project site from public views as demonstrated from Viewpoints 1 and 4 was determined to be significant and unavoidable. Please see Appendix 3.0-A, Attachment to EIR Text Revisions, of the Final EIR, Table 5-2, which provides a comparison of the impacts of each project alternative with the impacts of the Original Project.

C-83.4 Please see Topical Response 2, Aesthetics, regarding scenic views, vistas, and corridors.

Both the Original Project and Modified Alternative 2 would be consistent with 9-6, 9-30, and 9-31 listed in the Aesthetics section of the project's EIR. The Original Project would have an impact on ridgeline views because it would intrude into the view of the ridgeline from Viewpoint 2 and Viewpoint 3, and would therefore be inconsistent with Policies 9-2, 9-12, and 9-23 for which a significant and unavoidable impact was found. Modified Alternative 2 would not impact ridgeline views. With respect to each of the policies referred to above:

- Policy 9-2 requires that new development be sited and designed to protect views to and along the ocean, minimize alteration of natural land forms, be visually compatible with the character of its setting, and restore or enhance visual quality in degraded areas: neither the Original Project nor Modified Alternative 2 interfere with ocean views or alter a natural land form. The project site is not in a visually degraded area. The Original Project would impact ridgeline views, while Modified Alternative 2 would not (see Appendix 3.0-A, Attachment to EIR Text Revisions, Figures 5-9 and 5-10). See response about Policy 9-6, below, regarding the visual character of the setting.
- Policy 9-6 requires development to be visually compatible with the character of the surrounding area via several measures which were considered as follows: the project site plan includes deep setbacks to reduce the visibility of the project, breaks up the mass into multiple structures, uses exterior finishes that would blend into the surroundings, clusters development toward Main Street which is fully developed, incorporates landscape elements consistent with wetland conditions on the west side of the site and urban treatments consistent with Main Street on the east side of the site.
- Policies 9-12 and 9-23 require the protection of broad views of upland slopes and prominent ridgelines. The analysis concluded that the Original Project has an

impact on ridgeline views from SR-1. Please see Appendix 3.0-A, Attachment to EIR Text Revisions, of the Final EIR, for more information about Modified Alternative 2, which does not have such an impact.

- Policies 9-30 and 9-31 require avoiding impacts on dark night skies and sensitive habitat areas from exterior lighting through the submittal of lighting plans with applications for new development. A simulation of exterior lighting was included in the Draft EIR. A photometrics site plan will be required for Building Permit review, which will ensure compliance with Policies 9-30 and 9-31.

Please see Topical Response 2, Aesthetics and comment response C-2.1, which explains that the project would be inconsistent with Policy 9-23.

C-83.5 The reference to Chapter 18.36 of the Half Moon Bay Zoning Ordinance on Draft EIR page 4.1-13 has been revised to refer to Section 18.37.010. Zoning Code Sections 18.37.010, 18.37.020, and 18.37.030 are discussed in Section 4.1, Aesthetics, of the Draft EIR. The Half Moon Bay Architectural Advisory Committee has considered both the Original Project and Alternative 2 and provided input on design to address the criteria in Chapter 14.37.035. At the August 19, 2022 Planning Commission hearing on Draft EIR, the applicant presented an option for revising Alternative 2 by increasing the separation between the north and south hotel buildings from 16 to 32 feet. The Planning Commission, which is responsible for design review for this project, indicated that this would be a positive adjustment, and the applicant brought this change forward as part of Modified Alternative 2, the Proposed Project. Section 18.37.035 refers to building sites on upland slopes, but the project site is not located within the upland slope boundaries and this code section is thus not applicable.

For discussion of project consistency with the LCLUP (which serves as the City's General Plan Land Use Element) Policies 9-1, 9-2, 9-3, 9-6, 9-12, 9-23, 9-30, and 9-31, please see Table 4.1-1, in Section 4.1, Aesthetics, of the Draft EIR and Topical Response 2, Aesthetics.

C-83.6 Please see Topical Response 2, Aesthetics, regarding impacts to visual resources.

C-83.7 Please see Topical Response 2, Aesthetics, regarding impacts to visual resources.

As explained in Section 3.0, Project Description, of the Draft EIR, the primary goal of the LCP is to ensure that the local government's land use plans, Zoning Ordinances, zoning maps, and implementation actions meet the requirements, provisions, and polices of the California Coastal Act. The LCP allows the City to grant development permits and other

planning approvals within the coastal zone. Project consistency with the current LCLUP is discussed in each resource chapter of this Draft EIR.

Coastal Commission guidance regarding visual resources for the fire tower project predated the Local Coastal Land Use Plan certification by the California Coastal Commission in April 2021. The City considered this guidance when drafting the Local Coastal Land Use Plan update and incorporated it into the Chapter 9 policies. Therefore, the Coastal Commission's guidance is now embodied in the policies of the certified Land Use Plan and the project was reviewed for consistency with Chapter 9 policies.

C-83.8 Please see Topical Response 2, Aesthetics, regarding visual impacts.

For the proposed hotel, information about and discussion of the footprint, square footage, and visual impacts of Alternative 2, Reduced Intensity, were provided in Section 5.5.2, Reduced Intensity, Alternative 2 of the Draft EIR. The text revisions to Section 5.5.2 provided in Appendix 3.0-A, Attachment to EIR Text Revisions, of the Final EIR, describe and discuss the footprint, square footage, and visual impacts of Modified Alternative 2. Under Modified Alternative 2, construction of the subdivision for residential development would be facilitated by a four-lot parcel map. Future development of each residential parcel would be subject to a coastal development permit including LCLUP policy consistency analysis which includes visual resources. The lot nearest SR-1 would require a significant setback from SR-1 due to the presence of wetlands in the Caltrans right-of-way which would require a 50-foot buffer. The subdivision was redesigned as part of Modified Alternative 2 to better accommodate a buffer between the subdivided lots and wetlands located along SR-1. The height limit in the R-2 zoning district for duplex development is 28 feet. Numerous properties are developed along SR-1 with single-family homes closer than 50 feet to SR-1. The future residential development will be subject to coastal development permit review by the Planning Commission and subject to conformance with the LCLUP visual resource policies.

C-83.9 Please see Topical Response 2, Aesthetics, regarding visual impacts.

C-83.10 Please see Topical Response 2, Aesthetics, regarding visual impacts.

C-83.11 Please see Topical Response 1, Traffic, regarding traffic impacts.

C-83.12 Please see Topical Response 2, Aesthetics, regarding visual impacts analysis.

When the document was created using Adobe PDF, Figure 4.1-3 (specifically Viewpoint 2) was inadvertently stretched in the PDF versions, which distorted the aspect ratio; however, printed copies of the document were not affected, and correctly reflect the viewpoint. Figure 4.1-3 has been revised in Chapter 3.0, EIR Text Revisions, of the Final EIR. Further, the existing conditions picture in Figure 4.1-7, which compares existing conditions to the visual simulation, was not distorted and accurately compares both conditions. The visual simulations were modeled using three-dimensional modeling that was aligned with the camera angles of the chosen photographs (i.e., key viewpoints). The photo simulations were then rendered using the level of detail that had been designed, and added materials, with realistic lighting systems. The resulting viewpoint is an accurate representation of mass and scale based on the proposed application.

C-83.13 Cumulative impacts were analyzed pursuant to CEQA Guidelines Section 15130 for every resource area analyzed in the Draft EIR. As stated in Section 15130(a) of the CEQA Guidelines, if a project's incremental effect is not "cumulatively considerable . . . a lead agency need not consider that effect significant, but shall briefly describe its basis for concluding that the incremental effect is not 'cumulatively considerable'" Therefore, if the project contributes to a cumulative impact but its contribution is not cumulatively considerable, the Draft EIR shall indicate why the cumulative impact is not significant. Please see Topical Response 6, Cumulative Impacts, regarding cumulative impacts.

C-83.14 The Planning Commission is the decisionmaker for the project. The Planning Commission's determinations may be appealed to the City Council. City Council actions may be appealed to the Coastal Commission because the project site is within its appeals jurisdiction due to the presence of wetlands at the project site.

C-83.15 Please see the cumulative impacts analysis in each resource section of the Draft EIR. Because development of projects at a regional and local level is inevitable, the EIR must analyze cumulative impacts and determine if the project would make a cumulatively considerable contribution to such an impact. If it does, then the EIR must identify feasible mitigation measures, if any, to reduce the impact. If mitigation measures cannot reduce an impact to less than significant level, then City's decisionmakers must make a statement of overriding considerations explaining the specific reasons for approving the project notwithstanding unavoidable adverse environmental effects (CEQA Guidelines Section 15093). Please see Topical Response 6, Cumulative Impacts, regarding cumulative impacts.

Please see Section 4.15.5, Cumulative Impacts, of the Draft EIR, regarding Transportation and Traffic cumulative impacts.

C-83.16 Please see Section 4.1.5, Cumulative Impacts, of the Draft EIR, regarding cumulative impacts on aesthetics, Topical Response 6, Cumulative Impacts, regarding cumulative impacts to visual resources, and Topical Response 2, Aesthetics, regarding visual character.

C-83.17 As explained in Section 4.8, Greenhouse Gas Emissions, of the Draft EIR, long-term operational emissions associated with vehicular traffic, energy and water usage, and solid waste disposal would contribute to the cumulative GHG emissions in Half Moon Bay. However, the project would include measures and designs that would minimize cumulative effects. The project would include high-efficiency lighting throughout the site (i.e., LED lighting fixtures), VRF heating/Air Conditioning system, installation of low-flow plumbing fixtures, and use water efficient irrigation systems. Therefore, long-term operational GHG emissions would not generate emissions in exceedance of the BAAQMD thresholds, and the project's emissions would result in a less than cumulatively considerable contribution to GHG emissions applying the 660 MT CO_{2e}/year bright-line threshold, as determined by the CARB's 2017 Climate Change Scoping Plan. Additionally, the project would implement the applicable sustainability regulations in the Green Building Code to reduce GHGs to the project. Other GHG reducing measures are also identified to assist the State and the region in meeting its GHG reduction goals as outlined in CARB's *2017 Climate Change Scoping Plan*.

C-83.18 Please see comment responses C-83.1 and C-83.5 regarding the alternatives analysis and evaluation of the regulatory setting.

The documented opposition summarized by the commenter is not a comment on the adequacy or content of the environmental analysis in the EIR, but is noted and will be provided to decisionmakers through the publication of this Final EIR. Please see Topical Response 2, Aesthetics, which discusses aesthetic concerns related to prior projects such as the fire training tower. The fire training tower appeal predated the 2020 LCLUP, which was certified by the California Coastal Commission in 2021.

Additionally, please Topical Response 5, Modified Alternative 2, for a discussion regarding the adequacy of the analysis.

C-83.19 Please see Topical Response 2, Aesthetics, regarding impacts to visual resources. The terms "ridgeline" and "upland slopes" are used throughout LCLUP Chapter 9, Scenic and Visual Resources. This EIR uses the terms consistently with the LCLUP's use of these terms.

C-83.20 Please see comment responses C-83.1 and C-83.8 regarding Modified Alternative 2.

C-83.21 The Draft EIR is consistent with CEQA Guidelines Section 15146, which states that the degree of specificity in the EIR “will correspond to the degree of specificity involved in the underlying activity which is described in the EIR.” Please see Topical Response 2, Aesthetics, regarding impacts to visual resources.

C-83.22 Please see Topical Response 2, Aesthetics, regarding visual impacts. Please see comment responses C-83.1 and C-83.2 regarding the development and modifications to Alternative 2.

C-83.23 The discussion in Table 2-1, Summary of Impacts and Mitigation Measures (page 2-11 of the Draft EIR), has been corrected to remove reference to Mitigation Measure Cumulative AG-1, which is no longer needed because the applicant is demonstrating compliance with LCLUP Policy 4-10. The measure has been removed from the Final EIR. Please see the revisions to page 2-11 in the Final EIR, Chapter 3.0, EIR Text Revisions.

C-83.24 Please see Topical Response 2, Aesthetics, regarding lighting impacts.

As discussed in Section 4.1, Aesthetics, of the Draft EIR, nighttime light would be produced from interior room lighting, exterior lights and vehicles traveling to, from, and within the project site. Therefore, the project may increase the amount of daytime glare and nighttime light in the vicinity. Although the project has high visibility at public viewpoints, many mature bottlebrush trees that line the project site's eastern perimeter would partially obstruct light and glare introduced at the site from the adjacent residences and commercial businesses.

Based on the character of the existing site (an open, unlit field) coupled with the general darkness of the southern end of the City, the presence of illuminated rooms and other hotel features including exterior pathway lighting and parking lot lights, the project would introduce a significant new source of nighttime glare due to the permanent fixtures (i.e., external light sources, and interior light sources that would be visible externally).

This can be seen in the comparison between existing conditions and visual simulations as shown in Figure 4.1-10. Mitigation Measure AES-2 requires a lighting plan for any proposed exterior lighting to be submitted to the City for review and approval. Additionally, exterior lighting will be directed downward and away from adjacent properties and public/private right-of-way to prevent glare or excessive light spillover.

Lighting will be limited to low-intensity lights, and landscaping lighting will be limited to ground-level for walking/safety purposes. Mitigation Measure AES-2 would also apply to Modified Alternative 2.

With adherence to Mitigation Measure AES-2, interior lights (i.e., light spillover) would be reduced to a less-than-significant level for both interior and exterior lights present during operation of the project.

C-83.25 Please see comment responses C-83.1, C-83.2, and Topical Response 5, Modified Alternative 2, regarding the development and modification of Alternative 2. Additionally, please see comment response C-83.40, and Topical Response 2, Aesthetics, regarding visual impacts.

C-83.26 Please see comment responses C-83.1, C-83.2, C-83.8, and Topical Response 5, Modified Alternative 2, regarding the development and modification of Alternative 2. Additionally, please see comment response C-83.40, and Topical Response 2, Aesthetics, regarding visual impacts.

C-83.27 The proposed four lot subdivision alone does not trigger the City's Below Market Rate Housing Ordinance (Zoning Ordinance 18.35). Modified Alternative 2 proposes the development of up to 16 residential units over the four lots, but there are no plans at this time to develop any of the lots. They will be subject to future Coastal Development Permit applications and Design Review at a future date.

C-83.28 Please see Topical Response 1, Traffic, regarding vehicle trip generation rates.

As explained in Draft EIR Section 4.13, Population and Housing, the project would not directly or indirectly induce unplanned population growth. The completion of this project would provide temporary lodging for visitors, but there is no anticipated population growth due to the visiting population. The project is in a Commercial – General land use designation that serves both residents and visitors, including but not limited to day-to-day needs, professional offices and small-scale research and development uses, wholesale, retail, and live-work uses. Therefore, development of the Original Project would support implementation of the General Plan by developing a hotel with 129 guest rooms and supporting facilities such as a board room, lobby and lounge area, swimming pool, fitness area, and a multipurpose room. No permanent housing, other businesses, or extensions of roads or other infrastructure are proposed in this project. The development of Modified Alternative 2 would develop the site with a 102-room hotel and

fewer amenities, as described in greater detail in Topical Response 5: Modified Alternative 2.

Regarding greenhouse gas emissions, Section 4.8, Greenhouse Gas Emissions, of the Draft EIR, explains that the project's long-term operational emissions would be associated with vehicular traffic within the project vicinity, energy and water usage, and solid waste disposal. The CalEEMod model and project vehicle trip generation rates were used to estimate daily GHG emissions associated with full operation of the hotel and its amenities. As shown in Table 4.8-2, of the Draft EIR, the annual operational emissions of the Original Project are predicted to be 609 MT of CO₂e in the year 2022 and 548 MT of CO₂e in the year 2030. The project would not exceed the Bay Area Air Quality Management District's (BAAQMD's) 660 MT CO₂e/year bright-line threshold in either the opening or future years. Therefore, the project's GHG emissions would not be an exceedance.

C-83.29 A Mitigation Monitoring and Reporting Program (MMRP) was prepared to ensure that mitigation measures included in the Draft EIR are monitored and enforceable as conditions of approval. The MMRP includes a description of implementation and timing, monitoring responsibility, and verification of implementation.

Please see comment response C-46.1 regarding the transportation demand management program measures and updates to Mitigation Measure TRA-1.

C-83.30 Please see comment responses C-83.1, C-83.2, and Topical Response 5, Modified Alternative 2, regarding the development and modification of Alternative 2. Additionally, please see comment response C-83.40, and Topical Response 2, Aesthetics, regarding visual impacts.

C-83.31 For discussion of baseline conditions in regards to the methodology for level-of-service, please see Section 4.15.4, Impacts and Mitigation Measures, of the Draft EIR, Table 4.15-3 provides the criteria of LOS.

C-83.32 Table 4.0-1, List of Cumulative Projects, of the Draft EIR includes reference to projects within the City that include additional housing units (i.e., Cypress Point Affordable Housing Project). As explained in Section 4.0, Setting, Impacts, and Mitigation Measures, of the Draft EIR and as provided for in CEQA Guidelines Section 15130, the method used to identify regional projects for use in the cumulative impacts analyses, which are provided for each resource area analyzed in the Draft EIR, includes past, present, and probable future development projects along the San Mateo County Midcoast between the Tom Lantos Tunnel to the north, the Half Moon Bay southern city

limits to the south, and the Half Moon Bay city limits to the east. These projects are listed in Table 4.0-1. This list incorporates reasonably foreseeable projects that, when combined with the project, could contribute to cumulative impacts. The list also includes projected population and housing growth between project opening and 2040 consistent with the LCLUP update, as shown in Draft EIR Table 4.13-1. Therefore, expected growth was included in the analysis of cumulative effects.

The methodology used to analyze the project's contribution to cumulative environmental impacts included the consideration of past, present, and probable future projects within the region that could result in related or cumulative environmental impacts, including projects outside the control of the lead agency (Sections 15130 and 15355 of the CEQA Guidelines).

C-83.33 Please see comment responses C-83.1, C-83.2, and Topical Response 5, Modified Alternative 2, regarding the development and modification of Alternative 2. Additionally, please see comment response C-83.40, and Topical Response 2, Aesthetics, regarding visual impacts.

C-83.34 Please see Topical Response 2, Aesthetics, regarding policy consistencies and Modified Alternative 2.

C-83.35 Please see Topical Response 2, Aesthetics, for a discussion of the terminology used (ridgeline, upland slopes) in the analysis of impacts to views from publicly accessible locations near the project site.

C-83.36 Please see Topical Response 2, Aesthetics, regarding impacts to scenic views and vistas. For a discussion of Figure 4.1-3 (Viewpoint 2), please see comment response C-83.12.

The key viewpoints were selected for the analysis of visual impacts are representative of the locations from which the project would be seen, and for their usefulness in evaluating existing landscapes and potential impacts on protected visual resources pursuant to the Local Coastal Program. These views include the most significantly impacted views of the upland slopes from SR-1. Views from these vantage points were chosen in consideration of the site plan design (i.e., bulk and massing of above-grade development) in relationship to existing aesthetic conditions to determine visual impacts on scenic vistas, scenic resources, and visual character of the site and its surroundings pursuant to CEQA Guidelines, Appendix G, Section I.a) – c). In addition, the elements of visual quality, viewer concerns, visibility, number of viewers, and duration of view are also considered. A viewpoint from north of the project site looking south was not considered

because it did not meet the considerations discussed above as a location of useful evaluation as it is a designated general commercial/retail site.

Viewers would experience visibility of a project to varying degrees in a particular viewshed, depending on distance or other intervening structures or obstacles (i.e., landscaping, mature trees, surrounding buildings). This encompasses viewer exposure to the project. Viewer sensitivity is defined both as the viewer's concern for scenic quality and the viewer's response to change in the visual resources that make up the view. As the commentor stated in Comment C-83.36, Viewpoint 4 was chosen to represent local interest. The sensitivity of viewers in their perception of visual quality, as well as their sensitivity to changes in visual quality, varies based on familiarity with the view, as well as their sense of ownership of the view, and the nature of the viewer's activity while receiving the view. These factors, in turn, determine how much attention that person focuses on the view.

While the Original Project would interfere with a ridgeline view from areas adjacent to Viewpoint 4, the analysis indicates that there are no impacts to views of the protected Town Boulevard or views of the ridgeline as depicted by Viewpoints 2 and 3. Although Viewpoint 4 is not a protected view according to the City's LCLUP, it was evaluated due to community interest.

C-83.37 Please see Topical Response 2, Aesthetics, regarding visual impacts.

The Half Moon Bay Architectural Advisory Committee has considered both the project and Alternative 2 and provided input on design to address the criteria in Chapter 14.37. It is also noted that the height of the Senior Coastsiders development at 925 Main Street, which like the project site is also located within the South Main Street area as defined in the LCLUP, is approximately 41 feet in height in its tallest portions, and the building is approximately 290 feet long.

By comparison, the hotel portion of Modified Alternative 2 would conform with the 36-foot height limit for the Commercial – General zoning district and be comprised of two primary buildings with the south building being approximately 177 feet in length and the north building being approximately 225 feet in length. The long side of the south building would be parallel with Main Street, while the north building would be parallel with SR-1. When considered along a north-south axis as viewed from either the east or west, the overall length of development would span approximately 466 feet inclusive of a 32-foot breezeway creating a gap between the upper floor(s) of these primary buildings. Neither building would be the tallest structure or the longest structure in the South Main Street area. The overall mass is also considered in context with its 4.57-acre site whereas the Senior Coastsiders property is approximately 1.5-acres.

C-83.38 Please see comment response C-83.36 and Topical Response 2, Aesthetics regarding visual impacts. Design review criteria will be presented to the Planning Commission for its review of the Coastal Development Permit. The Planning Commission has oversight in making findings related to these criteria in its assessment of the Original Project or an alternative.

C-83.39 Please see Topical Response 2, Aesthetics, discussing policy consistencies related to visual impacts and that the Municipal Code Section 18.37 is part of the certified Local Coastal Program. Additionally, see Draft EIR pages 4.1-13 to 4.1-16 for a discussion of the policy consistency of the project with Half Moon Bay's Municipal Code Section 18.37.

Please see comment response C-83.2, for a discussion of Appendix 3.0-A, Attachment to EIR Text Revisions, Table 5-2 of the Final EIR which compares the Alternatives.

C-83.40 Please see Topical Response 2, Aesthetics, regarding impacts to views and visual resources.

As explained in Section 4.1, Aesthetics (page 4.1-18 of the Draft EIR), the project site is below the 160-foot contour line, and the site design incorporates deep setbacks from SR-1 to minimize visual intrusions into the ridgeline from the SR-1 view. Despite these design considerations, views of the ridgelines are impacted as viewed from northbound SR-1 approaching the project site from the south. Therefore, the project would be inconsistent with Section 18.37.035 part c of the Half Moon Bay Municipal Code ("Structures shall be sited so as to not intrude or project above the ridge line skyline as seen from Highways One and 92."), and impacts to views would remain significant and unavoidable for the Original Project. Modified Alternative 2 would not create this impact, however, and is consistent with Municipal Code Section 18.35.035.

Modified Alternative 2 would reduce the proposed massing of structures, spanning a length of 466 feet, or approximately 50 percent of the project site. This would maintain the visual balance of structures and open space. The overall floor area would also be reduced under Modified Alternative 2 (from 90,784 square feet in the Original Project to 66,268 square feet). Therefore, due to the reduction in massing and revised design considerations (i.e., roofing choices), Modified Alternative 2 would reduce the overall massing of the structures at the project site and increase the space between the two primary hotel buildings to 32 feet, improving available views from surrounding viewsheds, including those available from SR-1, as compared to the Original Project.

While Modified Alternative 2 would reduce impacts to scenic vistas and scenic resources, implementing Modified Alternative 2 would result in permanent changes in the existing visual quality of the project site. Although the project would incorporate high quality design elements, landscaping, and screening techniques, the visual quality of the

project site from public views is considered to be adversely affected by both the Original Project and Modified Alternative 2. Therefore, Modified Alternative 2 would substantially degrade the existing visual quality of the project site from public views, although to a lesser extent than the Original Project, and this impact would remain significant and unavoidable. This impact would be reduced by Modified Alternative 2, compared to the Original Project due to the significant reduction in building massing and space between buildings.

C-83.41 Please see Topical Response 2, Aesthetics, regarding visual impacts and the analysis processes.

C-83.42 Please see Topical Response 2, Aesthetics, regarding impacts to visual resources and LCLUP policy consistencies.

C-83.43 Please see Topical Response 2, Aesthetics, and Topical Response 5, Modified Alternative 2, regarding visual impacts and policy consistency.

C-83.44 Please see Topical Response 2, Aesthetics, regarding impacts to visual resources and project consistencies with the LCLUP.

C-83.45 Please see Topical Response 2, Aesthetics, and comment response C-83.4, regarding visual impacts and consistency with LCLUP Policy 9-2.

C-83.46 As discussed in Section 4.1, Aesthetics, of the Draft EIR, the definition of visual resource in Section 18.37.020 of the Zoning Ordinance does not apply to the stretch of SR-1 adjacent to the project because it has not been designated by the State as a scenic corridor. However, prior to the 2020 LCLUP update, the City had been following Coastal Commission guidance to treat SR-1 as a visual resource area, pursuant to the City's "Assessing Visual Resource Policies for Projects within 200 Yards of Highway One" memo. In the certified 2020 LCLUP, Policy 9-12 requires that new development in close proximity to or easily visible from the Town Boulevard scenic corridor, including Highways 1 and 92: (a) Protects views of visual resource areas as seen from the Town Boulevard, including views to the ocean, upland slopes (i.e. minimizes intrusions into the ridgeline), and the historic Johnston House; (b) Incorporates design standards such as screening of commercial parking areas and landscaping provisions; and (c) Is visually compatible with the surrounding land and development.

The City will be updating the Implementation Plan/Zoning Ordinance accordingly to maintain consistency. Therefore, as stated in the Draft EIR, the project would undergo design review pursuant to LCLUP Policy 9-3, which requires new development to be compatible with the character of the surrounding area. Please see Chapter 3.0, EIR Text Revisions, wherein Table 3.1-1 was revised to include consistency analyses for Policies 9-3 and 9-12. Please see Topical Response 2, Aesthetics, regarding visual impacts.

C-83.47 As explained in Section 3.6, Approvals and Entitlements, of the Draft EIR, the Draft EIR has been prepared to cover the anticipated actions associated with planning application PDP 072-13 for a proposed hotel facility, which includes an architectural and site/design review for the hotel. Therefore, while the project would include significant and unavoidable impacts to scenic resources, the project will undergo design review.

As explained in Section 4.1, Aesthetics, of the Draft EIR, impacts to scenic vistas would be considered significant and unavoidable. Mitigation measures would not reduce the overall impact to scenic resources to a less than significant level. Project design was developed with the intention of reflecting the visual character and visual quality of the project site's surroundings as well as maintaining the quality of public views to preserve the heritage and character of the city. Changes to the project site would be consistent with the developed nature of Downtown, although the buildings would be significantly larger and have longer facades than existing development patterns throughout Downtown and in the immediate neighborhood. To address this, the project would incorporate high quality design elements, landscaping, and screening techniques. The project would be subject to design review by the City, which would ensure consistency with the "small-town character" references in the LCLUP. Additionally, the project development would be clustered and set back from SR-1 and the intersection of SR-1 at South Main Street to allow for site lines across the substantially undeveloped portion of the site. The project mass would be broken up into multiple structures, and proposed building design and materials were selected to be visually compatible with agricultural building forms, colors, and rough textures. Please see comment response C-83.4, for further discussion of consistency with LCLUP policies. Please also see Topical Response 2, Aesthetics, regarding visual impacts.

Design review has been incorporated into the review process and includes review by the Architectural Advisory Committee and the Planning Commission at public meetings.

C-83.48 Please see comment response C-83.46 regarding visual quality and character. Additionally, please see Topical Response 2, Aesthetics, regarding visual impacts and consistency with LCLUP Policy 9-12.

The text of Section 4.1, Aesthetics, has been revised in Final EIR Chapter 3.0, EIR Text Revisions, to include a policy consistency analysis specific to Policy 9-12.

C-83.49 Please see Topical Response 2, Aesthetics, regarding visual impacts.

C-83.50 During construction, temporary lighting may be needed in work areas and staging areas during the allowable construction hours until 6:00 p.m. as regulated by the noise ordinance. Standard Condition AES-1 requires that appropriate light and glare screening measures, including the use of downward cast lighting, be used in construction, staging, and laydown areas. In addition, winter construction times where lighting would be required, shall cease at 5:00 pm from November 1 through January 31 and nighttime construction shall be prohibited.

Please see comment response C-83.24 and Topical Response 2, Aesthetics, regarding the impacts of exterior lighting during operation of the project.

C-83.51 This is not a comment on the adequacy or content of the environmental analysis in the EIR but is noted and will be provided to decisionmakers through the publication of this Final EIR.

C-83.52 Please see Topical Response 2, Aesthetics, regarding impacts to visual resources, scenic corridors, and bulk and massing of the project.

C-83.53 Please see Topical Response 2, Aesthetics, regarding impacts to visual resources, scenic corridors, and bulk and massing of the project.

C-83.54 Please see Topical Response 2, Aesthetics, regarding portions of the SR-1 that are locally designated as a scenic corridor.

C-83.55 Please see Topical Response 2, Aesthetics, regarding impacts to scenic views and vistas.

As stated in Section 4.1, Aesthetics, the use of the term “partially” is used to describe interference with longer distance views of the ridgelines and hillsides due to the height of the buildings and rooflines. Implementation of the project would substantially degrade the quality of public views of the project site and the surrounding area, specifically the long-range views of the ridgelines available from Viewpoints 3 and 4.

The Draft EIR further explains, on page 4.1-16, that the Original Project will interfere with the longer-range views of the hillsides and ridgelines. This aspect of the project is discussed in more detail in Draft EIR Section 4.1.4, Impacts and Mitigation Measures.

Pursuant to CEQA Guidelines Section 15151, the project was prepared with a degree of analysis to provide decisionmakers with information which enables them to make a decision which intelligently takes account of environmental consequences. Nothing has been omitted.

C-83.56 The language in the Draft EIR has been changed to remove the word “potential” from the following statements:

Page 4.1-22: “Buildout of the project ~~also has the potential to~~ would impact the long-range views of hillsides and ridgelines to the north and east of the project site (Viewpoints 2, 3 and 4). Views of the hillside from SR-1 and from the Naomi Patridge Trail would be partially ~~have the potential to be~~ obscured by the project.”

These changes are shown in Chapter 3.0, EIR Text Revisions, of this Final EIR.

Please see comment response C-83.36 for a discussion of the key viewpoints that were selected to be representative of the most critical locations from which the project would be seen, and for their usefulness in evaluating existing landscapes and potential impacts on protected visual resources pursuant to the Local Coastal Program.

Please see comment response C-83.19 for a discussion of impacts to views of the ridgeline and upland slopes available from the project site.

Please see comment response C-83.2, which describes aesthetics impacts associated with Modified Alternative 2. Additionally, please see Topical Response 2, Aesthetics, regarding visual impacts.

C-83.57 Viewpoints 2 and 3 were taken from the viewpoint of motorists on SR-1. Please see comment response C-83.36 for a discussion of Viewpoint selection and conclusions regarding significant and unavoidable impacts. Please see comment response C-83.3 for a discussion of upland slopes, ridgeline, and LCLUP policies.

The commenter inquires as to whether the discussion in Section 4.1, Aesthetics, of the Draft EIR, applies to Alternative 2. The discussion in Section 4.1, Aesthetics, concerns the Original Project. The analysis of Alternative 2 is provided in Chapter 5.0, Alternatives, of the Draft EIR and the analysis of Modified Alternative 2 is provided in Appendix 3.0-A, Attachment to EIR Text Revisions, of the Final EIR.

C-83.58 Please see comment responses C-83.3, C-83.36, and C-83.57 and Topical Response 2, Aesthetics, regarding impacts to public views.

C-83.59 Please see Chapter 3.0, EIR Text Revisions, of the Final EIR, for revisions made in an effort to clarify this language.

C-83.60 Please see comment response C-83.24 and Topical Response 2, Aesthetics, regarding the impacts of exterior lighting.

C-83.61 Please see comment response C-83.24 and Topical Response 2, Aesthetics, regarding the impacts of exterior lighting.

C-83.62 Please see Topical Response 2, Aesthetics, regarding visual impacts.

C-83.63 As a point of clarification, please see comment response C-83.48 and Topical Response 2, Aesthetics, which addresses concerns regarding Policy 9-6 consistency.

C-83.64 Chapter 4.2, Agricultural Resources, of the Draft EIR provides a discussion of the project's consistency with LCLUP Policy 4-10. The approximately 5-acre project site is mapped for Prime Soils for San Mateo County (Figure 4.2-1). Approximately 2 acres of the site are or would be devoted to wetlands, wetland buffers, and/or restoration in association with wetlands. The project is therefore required to compensate for the loss of about 3 acres of prime agricultural soils which can be accomplished through a variety of ways. The City will review the applicant's proposed approach to compensation, before considering project approval, to ensure that adequate in-lieu fees or other compensatory mitigation would comply with this policy. Modified Alternative 2, the Proposed Project, provides a much more detailed proposal for how Modified Alternative 2 will address mitigation for the conversion of agricultural land through payment of in-lieu fees in accordance with the Half Moon Bay LCLUP Policy 4-10.

Based on the limited size of the parcel and its isolated context, a Land Evaluation and Site Assessment (LESA) was prepared as part of the Draft EIR to make determinations of the potential significance of a project's conversion of agricultural lands. Based on the LESA worksheet (Appendix B), the parcel scored a 36. LESA scores of 39 or less are "not considered significant." The project is aligned with the California Coastal Act (CCA) and would not be considered significant using the California Agricultural LESA Model;

therefore, the project would have a less than significant impact to the conversion of existing agricultural lands.

The loss of prime agricultural soils, however, within Half Moon Bay and San Mateo County is considered a significant cumulative impact because it would result in loss of a non-renewable resource when considering the development of the project in conjunction with other projects.

Consistent with Policy 4-10, the project applicant will mitigate for the loss of prime soils by supporting the San Mateo Resource Conservation District or other City approved means of providing agricultural land protections or soils restoration. Policy 4-10 states that all conversions of prime and non-prime agricultural lands to a new non-agricultural use, excluding farmworker housing, agricultural compatible uses, and supplemental uses as defined in the Half Moon Bay Local Coastal Land Use Plan such as habitat restoration and recreation, shall be mitigated at a ratio to be established based on the quality of agricultural lands converted, their location, and other relevant factors as evaluated in a report prepared by a qualified professional for the City's review and approval. Methods for mitigation may include but are not limited to establishing agricultural conservation easements, soil restoration, or in lieu fees in partnership with land trust and conservation agencies. Protection or restoration of agricultural lands within city limits is preferred, followed by lands within the coastal zone of unincorporated San Mateo County and, finally, by other coastal zone areas. Therefore, the loss of 3.05 acres of prime agricultural soils associated with the project is not a considerable contribution to a significant cumulative impact to loss of agricultural uses and prime soils for the City and San Mateo County coastal agricultural operations.

C-83.65 As discussed in Section 4.7, Energy, of the Draft EIR, the project is not anticipated to substantially increase the use of energy in the City of Half Moon Bay. The project would comply with all State requirements related to energy usage including California's Energy Efficiency Standards for New Buildings, Title 24, and California's Renewable Energy Portfolio Standard Program.

Project implementation would incorporate several sustainability elements in an effort to reduce wasteful energy consumption. The project would also install glass solar panels on the roof, which would generate approximately three percent of the electricity used on-site.

Additionally, project construction would not increase demands on the electric power network during peak and base period demand periods, because construction energy demands would be largely associated with equipment and transportation fuels. Based on the total project energy usage stated in Section 4.7, Energy, of the Draft EIR, the Original Project's estimated energy demand in 2022 (9,528 MMBtu, which converts to approximately 3 GWh) represents an extremely small fraction, 0.00075 percent of the

regional energy use. The energy use for Modified Alternative 2 is similar and is detailed further in Appendix 3.0-A, Attachment to EIR Text Revisions, of the Final EIR.

C-83.66 As explained in Section 4.7, Energy, of the Draft EIR, the modeling inputs were applied to the CalEEMod model and are reflected in the energy mitigated outputs. Sustainability measures were applied to the CalEEMod model and reflected in GHG emissions. The modeling was based on the application of GHG reduction regulations to the project that are identified in assisting the State and the region in meeting its GHG reduction goals.

Although GHG is a global issue, the GHG emissions affiliated with the project are evaluated at a local level and take into consideration known information regarding the project to the extent feasible. To include flight analysis and other undefined project components is speculation. Pursuant to CEQA Guidelines Section 15145, if after thorough investigation, a lead agency finds that a particular impact is too speculative for evaluation, the agency should note its conclusion and terminate discussion of the impact. Regarding the VMT analysis included in Section 4.15.4, Impacts and Mitigation Measure, the VMT by the project to the roadway network is shown on page 4.15-29 (Table 4.15-6) of the Draft EIR. As shown, the Original Project would add 575 daily trips, which is 5,002 total VMT. Trip generation would decrease under Modified Alternative 2, the Proposed Project, and Alternative 3, when compared to the Original Project.

Please see Topical Response 1, Traffic, regarding VMT analysis.

C-83.67 Please see comment response C-83.16 regarding traffic impacts.

C-83.68 According to the Preliminary Delineation report¹, discussed in Section 4.10.2, Existing Conditions, of the Draft EIR, the drainage channel is an existing linear ditch likely constructed to collect runoff from the adjacent roadway. The wetland areas are thinly shaped and parallel SR-1, extending for three-fourth of the length of the channel within the project site. As described in Section 4.4, Biological Resources of the Draft EIR, the California Coastal Commission has reviewed the extent and quality of the wetland areas and has not designated any as Environmentally Sensitive Habitat Areas. No evidence of an existing or past agricultural pond at the site was identified.

¹ Preliminary Delineation of Waters of the U.S. and State, HT Harvey & Associates, 2017.

C-83.69 Please see Section 4.15, Transportation and Traffic, of the Draft EIR, and Topical Response 1, Traffic, regarding traffic impacts.

C-83.70 Please see Topical Response 1, Traffic, regarding selection of times studied for the traffic technical report. As explained in Appendix H, Traffic Impact Study (page 16 of the Draft EIR), the same methodology was used for both the weekday and weekend analyses. In both instances the period with the highest number of counted vehicle volumes was used.

C-83.71 According to Section 4.15.3, Regulatory Settings, of the Draft EIR, neither the Original Project nor Modified Alternative 2 would create traffic flow that would exceed Caltrans and local standards. As such, both the Original Project and Modified Alternative 2 are consistent with Caltrans policies. The required analysis is presented in Section 4.15.4, Impacts and Mitigation Measures, of the Draft EIR and in Appendix 3.0-A, Attachment to EIR Text Revisions, of the Final EIR.

C-83.72 According to Appendix H, Traffic Impact Study, of the Draft EIR, under Existing Conditions, all roadway segments currently operate within the acceptable LOS standard during all three peak hours evaluated. A summary of roadway segment LOS is provided in Table 5. The San Mateo County (C/CAG-VTA) Travel Demand Model was used to estimate trip distribution patterns within the study area by comparing relative traffic on major roadways and then applying manual adjustments based on knowledge of the area and the application of professional judgment. The applied distribution assumptions and resulting trips are shown in Table 9 and Figure 6. Refer to Table 4.15-5, Unmitigated VMT Summary, in the Draft EIR, where the total number of daily trips is analyzed. Additionally, please see Topical Response 1, Traffic, regarding traffic impacts.

C-83.73 The number of added trips by the Original Project to the roadway network is shown in Table 4.15-7 (page 4.15-31 of the Draft EIR). As shown, the project would add 575 daily trips. As explained in Section 5.5, Alternatives Analyzed, of the Draft EIR, trip generation would decrease under Alternative 2 and Alternative 3, when compared to the project. Trip generation would similarly decrease under Modified Alternative 2 (Appendix 3.0-A, Attachment to EIR Text Revisions, of the Final EIR).

C-83.74 Please see comment response C-83.72 regarding traffic impacts that may result from the project. As described in Section 4.15.5, Cumulative Impacts, of the Draft EIR, the projected traffic volumes are shown in Figure 4.15-9. The comparison between Cumulative No Project and Cumulative plus Original Project operating conditions are

shown in Table 4.15-13. Also, a comparison of the Existing with Project and Cumulative with Project is included in Table 4.15-14. As shown in Table 4.15-13 and Table 4.15-14, intersections at LOS F occur with or without the project. Given this, the Original Project would not result in a cumulatively considerable contribution to a cumulative impact related to traffic.

C-83.75 Please refer to comment response C-83.31 regarding the methodology for level-of-service.

According to the methodology used in Appendix H, Traffic Impact Study, of the Draft EIR, both roadway and intersection Levels of Service are calculated based upon peak hour volume and not daily volumes as mentioned in the comment.

C-83.76 Please see comment response C-83.2 and Topical Response 2, Aesthetics, regarding significant the visual impacts of Modified Alternative 2.

C-83.77 This comment is noted and will be provided to decisionmakers through the publication of this Final EIR.

C-83.78 Please see comment response C-83.2 and Topical Response 2, Aesthetics, regarding significance determinations for the visual impacts of Modified Alternative 2.

C-83.79 Refer to Section 5.5.2, Reduced Intensity, of the Draft EIR, for a description of Alternative 2. Please see Topical Response 2, Aesthetics, regarding visual impacts.

C-83.80 Please see comment response C-83.40 and Topical Response 2, Aesthetics, regarding impacts to views and visual resources.

C-83.81 Please see comment response C-83.40 and Topical Response 2, Aesthetics, regarding impacts to views and visual resources.

C-83.82 Please see comment response C-83.2 and Topical Response 2, Aesthetics, regarding the significance determinations for the visual impacts of Modified Alternative 2.

C-83.83 Please see comment response C-83.1 and Topical Response 2, Aesthetics, regarding the terminology related to the analysis of visual impacts and Topical Response 5, Modified Alternative 2.

C-83.84 Please see comment response C-83.2 and Topical Response 2, Aesthetics, regarding the visual impacts of Modified Alternative 2. Regarding wetlands, Alternative 2 would have resulted in a new parcel within the 100-foot buffer for wetlands. By comparison, Modified Alternative 2, the Proposed Project, can be developed without encroachment into ESHA or a required ESHA buffer.

C-83.85 Please see comment response C-83.2 and Topical Response 2, Aesthetics, regarding the significance determinations for the visual impacts of Modified Alternative 2.

Story poles were erected at the project site in order to provide the community with an idea of the scale and massing of the project. Pursuant to CEQA Guidelines Section 15204 (a), CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended by commenters. When responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the Draft EIR. A good faith effort was made to inform the public of the visual impacts of the project, and the applicant intends to continue to provide story poles, consistent with the City Council approved story pole policy in advance of and throughout the public hearing process.

C-83.86 Please see comment response C-83.2 and Topical Response 2, Aesthetics, regarding the significance determinations for the visual impacts of Modified Alternative 2. Additionally, please see comment response C-83.7, regarding the fire tower project and its relation the project.

C-83.87 Please see comment responses C-83.1 and C-83.8, regarding the housing portion of Modified Alternative 2. Future development of each of the lots proposed to be created via the parcel map would require coastal development permits including an LCLUP policy consistency analysis. Please see Topical Response 5, Modified Alternative 2, regarding aesthetics.

C-83.88 The applicant's Proposed Project, Modified Alternative 2, includes a four-lot parcel map and future residential development of up to 16 residential units on the 1.15-

acre parcel north of Seymour Street. The applicant is not proposing to decouple the project elements.

C-83.89 Please see comment responses C-83.1 and C-83.8 and Topical Response 2, Aesthetics, regarding Modified Alternative 2 and visual impacts.

C-83.90 This comment is noted and will be provided to decisionmakers through the publication of this Final EIR. Please see Topical Response 1, Traffic, regarding traffic impacts. The identification of the environmentally superior alternative is determined by comparing the impacts of the project and the alternatives. See CEQA Guidelines Section 15126.6(e)(2). Both Modified Alternative 2 and Alternative 3 would substantially reduce the project's aesthetic impacts associated with reduced project massing, increased setbacks, and improved site plan. These alternatives also address land use conflicts by converting a surface parking lot, used by an auto dealership, into residential development in an R-2 zoning district, aligning with City housing policies

However, the four-lot parcel map proposed as part of Modified Alternative 2 is environmentally superior to the eight-lot subdivision proposed as part of Alternative 3. While both Alternatives would have similar environmental effects, Modified Alternative 2 better meets the City's and project applicant's primary project objectives, goals, and policies by maintaining adequate setbacks from sensitive resources.

Please see comment response C-83.17 regarding greenhouse gas emissions and cumulative impacts.

C-83.91 Depiction of the drainage system for the project, as well as for Modified Alternative 2 and Alternative 3, are included in Figure 5-7, Drainage System. Additionally, Appendix I, Drainage Memorandum - Alternative 2, further illustrates how Alternative 2 would manage stormwater flows, enhance wetland buffer zones with native plants, and incorporate source control measures and bioretention areas that help filter potential pollutants from the water system. As stated in Chapter 3.0, EIR Text Revisions, Appendix A, due to the minimal differences between the Reduced Intensity, Alternative 2, and the Modified Alternative 2, the analysis would be applicable to the Modified Alternative 2. Therefore, the conclusions in Appendix I, Drainage Memorandum – Alternative 2, would be the same for Modified Alternative 2.

Regarding identification of the environmentally superior alternative, see comment responses C-83.17 and C-83.90. Regarding wetlands, Alternative 2 would have resulted in a new parcel within the 100-foot buffer for wetlands. By comparison, Modified Alternative 2 can be developed without encroachment into ESHA or a required ESHA buffer.

C-83.92 Please see Topical Response 2, Aesthetics, regarding project impacts to views of inland hillsides and ridgelines.

C-83.93 This comment is noted and will be provided to decisionmakers through the publication of this Final EIR. Please see comment responses C-83.1 to C-83.92 regarding planned residential development and visual character.

C-83.94 A thread from the Nextdoor application was submitted by a member of the public as an attachment to the commenter's letter, numbered C-83. The majority of commenters on the thread expressed opposition to the project, citing concerns regarding diminished visual quality, increased traffic, emergency access and traffic safety concerns, and water scarcity concerns. A few commenters expressed support for the project, citing more revenue due to increased tourism. The City will consider these comments, including expressions of opposition to and support for the project, in its actions on the Draft EIR and the project. However, individual responses were not generated, as CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended by commenters, per Section 15204(a) of the CEQA Guidelines. For responses to comments related to traffic, aesthetics, adequacy of water supply, and safety, see Topical Responses 1, 2, 3, and 4. Please see comment responses C-83.1 to C-83.93 for discussions of project planning, impacts, and preparation of project-related documents.

C-83.95 through C-83.106 This is not a comment on the adequacy or content of the environmental analysis in the Draft EIR, but is noted and will be provided to decisionmakers through the publication of this Final EIR. Please see comment responses C-83.1 to C-83.93 regarding aesthetic impacts, visual character, views of scenic vistas, and traffic impacts. Please see Topical Response 2, Aesthetics, regarding visual impacts.

C-83.107. Please see Topical Response 2, Aesthetics, regarding story poles.

Receipt of the submitted photographs of the story poles is acknowledged and they will be provided to decisionmakers through the publication of this Final EIR.

C-83.108 Please see Topical Response 2, Aesthetics, regarding story poles.

Receipt of the submitted photographs of the story poles is acknowledged and they will be provided to decisionmakers through the publication of this Final EIR.

C-83.109 Receipt of the submitted photographs of the story poles is acknowledged and they will be provided to decisionmakers through the publication of this Final EIR. Please see Topical Response 2, Aesthetics, regarding project impacts to views of hills and ridgelines.

C-83.110 Receipt of the submitted photographs of the story poles is acknowledged and they will be provided to decisionmakers through the publication of this Final EIR. The story poles that were erected at the project site were intended to provide the community with an idea of the scale and massing of the project. Please see Topical Response 2, Aesthetics, regarding project impacts to the views of hillsides and ridgelines.

C-83.111 Receipt of the submitted photographs of the story poles is acknowledged and they will be provided to decisionmakers through the publication of this Final EIR. Please see Topical Response 2, Aesthetics, regarding project impacts to views of inland hillsides and ridgelines.

C-83.112 Receipt of the submitted photographs of the key viewpoints is acknowledged and they will be provided to decisionmakers through the publication of this Final EIR. As discussed in Section 4.1, Aesthetics, of the Draft EIR, the project is not consistent with LCLUP Policy 9-23, which concerns protecting broad views of upland slopes, prominent ridgelines and other intervening ridgelines as viewed from scenic corridors. For further information regarding LCLUP Policy 9-23, please see comment response C-2.1.

Please see Topical Response 2, Aesthetics, regarding visual impacts.

C-83.113 Receipt of the submitted photographs of the story poles is acknowledge and they will be provided to decisionmakers through the publication of this Final EIR. The impact to ridgelines due to project implementation will be significant and unavoidable. Please see Topical Response 2, Aesthetics, regarding impacts to visual quality.

C-83.114 Receipt of the submitted photographs of the story poles is acknowledged and they will be provided to decisionmakers through the publication of this Final EIR. The impact to ridgelines due to project implementation will be significant and unavoidable. Please see Topical Response 2, Aesthetics, regarding impacts to visual quality.

C-83.115 Receipt of the submitted photographs of the story poles is acknowledged and they will be provided to decisionmakers through the publication of this Final EIR. As discussed in Section 4.1, Aesthetics, of this Draft EIR, the impact to views of ridgelines due to project implementation will be significant and unavoidable. Please see Topical Response 2, Aesthetics, regarding impacts to visual quality.

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Comment Letter: D-1, Margaret Gossett

September 13, 2022

Jill Ekas, Community Development Director
501 Main Street
Half Moon Bay, CA 94019

Dear Jill,

Many thanks for extending the time for the public review of the draft environmental impact report (DEIR). After review of the draft DEIR, my comments below:

General Comments

- D-1.1 | • An appendix for acronyms is missing, and there were inconsistencies defining acronyms at first use throughout the DEIR.
- D-1.2 | • Rezoning the planned unit development (PUD) to commercial general (CG) for alternate two with housing complicates the DEIR. Alternative two is vague in this DEIR; the housing component should have a separate DEIR.
- D-1.3 | • The 120,000 sq. ft. impervious coverage could create problematic flooding onsite or downstream, impacting transit in an emergency.
- D-1.4 | • The proposed construction traffic plan could negatively impact the nearby elementary school and the downtown business corridor. Alternative routes for construction traffic are missing.
- D-1.5 | • Bluff erosion at Seymour Ditch and incision of the ditch could worsen due to overflow of stormwater during intense storms.
- D-1.6 | • Cumulative impacts of the project did not consider the possible Northern Half Moon Bay Shoreline Improvement Project.
- D-1.7 | • Hyatt is not an affordable hotel. The project is inconsistent with Coastal Act policy to provide affording lodging.
- D-1.8 | • The study does not consider an alternative for a smaller or different hotel type.

Project Objectives

- D-1.9 | • The lead agency has not quantified an unmet need for more hotel rooms in Half Moon Bay (i.e., the economic impact on Half Moon Bay).

Construction

- D-1.10 | • Trucking 380 cubic yards of fill material into Half Moon Bay and the effect on transit are missing. Alternative routes for debris disposal are missing.
- D-1.11 | • Stormwater sheet flow calculations are missing.
- D-1.12 | • Training only one crew member does not adequately address mitigation measures to protect the CRLF or SFGS during construction.

Aesthetics

- D-1.13 | • Alternative two would not improve the view of upland slopes and ridge lines. The housing proposal will also impact the massing of the site.
- D-1.14 | • The proposed construction of a sound barrier wall for the housing project will conflict with the scenic character of the town boulevard on SR 1.

Air Quality

- D-1.15 | • Air quality monitoring near the site and within the neighborhoods is missing.
- D-1.16 | • Installation of the gas generator for construction and the related impact of greenhouse gases is missing.

Biological Resources

- D-1.17 | • The proposed stormwater management plan does not explain the impact on wetlands.
- D-1.18 | • Development of the site will negatively affect migratory birds that currently use the site as a stopover for rest and refueling. Mitigation measures for this are missing.

Cultural and Tribal Cultural Resources

- D-1.19 | • The study does not outline purposeful methods for contacting affected tribes. Sensitive mitigation measures for the potential loss of cultural resources are missing.

Geology and Soils

- D-1.20 | • Mitigation measures for loss of Ag Soils are missing.

Water

- D-1.21 | • A drinking water use analysis is missing. The DEIR relies on a memo from the Coastside County Water District (CCWD) stating that there is enough water rather than a fact-based water use analysis. Also, the DEIR does not discuss CCWD's recent actions to declare a water shortage emergency and implementation of water restrictions.
- D-1.22 | • The proposed dual treatment system for stormwater might not adequately protect groundwater quality during intense storms.

Noise

- D-1.23 | • The speed limit of 50 mph on SR 1 will generate noise that will make it uncomfortable for guests using the outdoor areas.

- D-1.24 | • Alternative two does not consider the potential measures to reduce noise within the proposed housing.

Transportation and Traffic

- D-1.25 | • The traffic study is insufficient and flawed as it did not study worst-case conditions. Studies should have been done during the peak of every season, holidays, festivals (pumpkin season), and Sundays.
- D-1.26 | • DEIR did not study the impact of project construction on public transportation.

- D-1.27 | Given the cited deficiencies, it would be helpful to have a further study of the environmental impacts of the project and re-submit the DEIR for public comment.

Respectfully submitted,

Margaret Gossett

Response to Commenter Letter D-1: Margaret Gossett

D-1.1 A list of acronyms used in the Draft EIR and Final EIR has been added. Please see Chapter 3.0, EIR text Revisions, of the Final EIR for acronym definitions.

D-1.2 As described in the text revisions in Appendix 3.0-A, Attachment to EIR Text Revisions, of the Final EIR, the 1.15-acre parcel north of Seymour Street is zoned for residential development in the R-2 (Two family Residential) Zoning District and is being used as overflow parking for the dealership. This conflicts with the parcel's land use and zoning. However, residential development at this parcel under Modified Alternative 2 and Alternative 3 would be consistent with the parcel's land use designation and zoning. Please see Topical Response 5, Modified Alternative 2 regarding modifications to project alternatives and planning.

The project site is zoned for Planned Unit Development (PUD). The LCLUP (Appendix A Table A-1) identifies rezoning this site to Commercial-General to implement the LCLUP for this property, which would be a use consistent with the project. Furthermore, in advance of updating the zoning districts to be consistent with the LCLUP, the LCLUP governs land use consistency pursuant to LCLUP Policy 1-2.

Please see Topical Response 7, LCLUP and Zoning of the Hyatt site, regarding zoning and land use.

D-1.3 As described in Draft EIR Chapter 4.10, Hydrology and Water Quality, Implementation of the Original Project would add 120,000 square feet (2.75 acres) of impervious surfaces where currently no impervious surfaces exist. Project design incorporates several landscape elements that would help contain stormwater in the event of a flood, including self-retaining stormwater treatment areas and bioretention areas on the western side of the project site.

Section 4.10.4, Impacts and Mitigation Measures, of the Draft EIR, states that NPDES permit compliance during project construction would prevent runoff from the project site from exceeding the capacity of stormwater drainage systems and would ensure that no substantial additional sources of polluted runoff are created. The project design includes a dual treatment system that would receive runoff, preventing the release of polluted stormwater and the prevent impacts on stormwater drainage system during project operation.

D-1.4 See Topical Response 5, Modified Alternative 2 regarding modifications to project alternatives and planning. CEQA Guidelines Section 15126.6 governs the identification and analysis of alternatives in an EIR stating, "[a]n EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which

would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project and evaluate the comparative merits of the alternatives.” The EIR should also briefly describe the rationale for selecting the alternatives to be discussed. As explained in Draft EIR Chapter 5.0, Section 5.4 (Alternatives Considered but Rejected for Further Analysis), the City considered several development scenarios that were rejected by either the City or the applicant because they did not meet the project objectives.

Pursuant to CEQA Guidelines Section 15126.6 (f), “[t]he alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the project. The range of feasible alternatives shall be selected and discussed in a manner to foster meaningful public participation and informed decision making.” In addition, the EIR is required to analyze a No Project alternative per CEQA Guidelines Section 15126.6 (e).

Alternatives 2 and 3 were developed to provide a range of reasonable alternatives that meet the City’s and applicant’s project objectives and reduce significant impacts associated with the project in accordance with the requirements of CEQA. Following circulation of the Draft EIR, the applicant submitted revised plans to the City indicating that Alternative 2 (with revisions), is now the Proposed Project that would be considered for approval. This Proposed Project is described in the Final EIR as Modified Alternative 2. For a more detailed description of the revisions included in Modified Alternative 2, please see the text revisions in Appendix 3.0-A, Attachment to EIR Text Revisions, of the Final EIR.

The commenter is correct that the City and the project applicant have been engaged in public outreach to increase public input regarding the potential to revise the project in order to reduce impacts. Through that process, the applicant refined Alternative 2 from the Draft EIR and brought forward Modified Alternative 2. Accordingly, Modified Alternative 2 is evaluated in the Final EIR and is now the Proposed Project. The other alternatives analyzed in the Draft EIR are the No Project alternative (see Draft EIR Section 5.5.1), and Alternative 3 (Multi-Family Residential), which is analyzed in Section 5.5.3. Modified Alternative 2 and Alternative 3 were analyzed using quantitative analyses similar to the project, including generation of visual simulations and air quality, noise, and traffic analysis, at the same level of detail as the Original Project.

D-1.5 As described in Chapter 4.10, Hydrology and Water Quality, compliance with NPDES requirements would prevent erosion, siltation, and flooding on- and off-site. Construction activities would not alter the course of the existing drainage channel that contains wetland characteristics on the project site, and no streams or rivers are present on the project site. Further, landscaping elements such as self-retaining stormwater

treatment areas and Bioretention areas would prevent changes in drainage patterns from creating erosion, siltation, and flooding.

D-1.6 The Surfers Beach Pilot Restoration Project is currently speculative and undergoing the Environmental Review and Permitting Process. The Surfers Beach Pilot Restoration project would involve dredging of up to 100,000 cubic yards (CY) of clean sand accumulated along the inside of Pillar Point Harbor's East Breakwater and a onetime placement of that sand to form an elevated berm along an approximately 1,000-footlong section of shoreline at Surfers Beach in Half Moon Bay. In addition to the opportunistic placement of sand on Surfers Beach and conducting maintenance dredging inside the harbor to ensure safe navigation and anchorage, the overall Project also involves implementing a plan to mitigate for impacts to eelgrass beds in the dredging areas by establishing new eelgrass habitat and transplants within Pillar Point Harbor's west basin. The Initial Study for the Surfers Beach Pilot Restoration project prepared a Mitigated Negative Declaration and found that no significant impacts would occur. All impacts were determined to be short term and temporary and would not result in cumulative impacts.

Taking the Surfers Beach Pilot Restoration Project into account for the Cumulative Scenario would not change the findings of the Draft EIR.

D-1.7 As stated in Chapter 3.0, Project Description, of the Draft EIR, the project would be consistent with the City's project objective of meeting demand for branded and reasonably affordable hotel rooms to support Half Moon Bay's growing local tourist and agribusiness economies. Past studies indicate that there is adequate visitor demand on the coast to support the project. Furthermore, the Chamber of Commerce has also found a need for conference facilities that can support mid-week hotel demand which is off-peak from the high weekend demand. The proposed hotel would be mid-range, featuring more amenities than a budget hotel, but would be lower in cost than a luxury hotel.

The project was found to be consistent with LCLUP Policy 5-71, which requires new development of higher cost accommodations, and/or new development that would fail to provide lower cost accommodations on land where that use is allowed and suitable, to provide lower cost accommodations (See Table 4.13-3 in Draft EIR Section 4.13, Population and Housing). The proposed hotel would offer new accommodations and would not replace any existing low-cost rooms. The project is providing bicycle rentals and a new trail segment. As part of the permitting process, the City will review the project's contribution to public coastal access through, for example, reduced cost lodging and/or in-lieu fees as a condition of approval to ensure compliance with this policy in coordination with the Coastal Commission guidance and the City's LCLUP Policy 5-71, which is the standard of review for the Coastal Commission with respect to development

within the City of Half Moon Bay. Also see Topical Response 5, Modified Alternative 2 regarding modifications to project alternatives and planning. Modified Alternative 2 provides a much more detailed proposal than the Original Project for how Modified Alternative 2, the Proposed Project, will address the provision of lower-cost visitor accommodations with a combination of lower-cost rooms and no-cost visitor-serving amenities available to the public in accordance with the Half Moon Bay LCLUP.

D-1.8 As described in the text revisions in Appendix 3.0-A, Attachment to EIR Text Revisions, of the Final EIR, the Reduced Intensity Alternative (Modified Alternative 2) is a reduced size hotel. The Original Project consists of a 90,784 square-foot, 129 room hotel. By contrast, Modified Alternative 2 consists of a 66,268-foot, 102 room hotel. Modified Alternative 2 would reduce the overall massing of the project as well as increase building setbacks, which would reduce the aesthetics impacts associated with the project.

Several alternatives to the project were identified and considered by the City but were rejected for further analysis due to failure to meet basic project objectives, infeasibility, and inability to avoid significant environmental impacts. Please see Section 5.4, Alternatives Considered but Rejected for Further Analysis, and Section 5.4.1, Alternative Site Locations, in the text revisions to Chapter 5.0 for information regarding alternatives considered but rejected for further analysis, and alternative project site locations that were considered but rejected for further consideration. Alternative hotel franchises were not considered, because it is unrelated to the analysis of the environmental impacts in the EIR.

D-1.9 This comment does not pertain to the adequacy of the Draft EIR. Economic effects are not included in the scope of environmental impacts defined under CEQA. Therefore, no further response is required.

D-1.10 Please see comment response D-1.4 regarding alternative traffic routes.

D-1.11 As described in Draft EIR Section 4.10, Hydrology and Water Quality, impacts from project implementation on beneficial uses and stormwater were determined through review of the project design and San Francisco Basin Water Quality Control Plan (Basin Plan). NPDES compliance during project construction would prevent runoff from the project site from exceeding the capacity of stormwater drainage systems and would ensure that no substantial additional sources of polluted runoff are created. The project design includes a dual treatment system that would receive runoff, preventing the

release of polluted stormwater, and prevent impacts on stormwater drainage system during project operation.

D-1.12 Mitigation Measure BIO-1b requires that a qualified biologist shall conduct a training session for all construction personnel.

D-1.13 The Reduced Intensity alternative, Modified Alternative 2, would reduce the footprint and overall massing as compared to the Original Project. As shown in the Visual Simulations prepared for Modified Alternative 2, this would allow for increased view of upland slopes and ridgelines as compared to the Original Project and depicted in Viewpoints 2 and 3. Viewpoints 1 and 4, do not present protected views according to LCLUP policies, however, they were included due to community interest. The visual character or quality of the site and its surroundings from Viewpoints 1 and 4 would be degraded; therefore, the impact would remain significant and unavoidable. Therefore, Appendix 3.0-A, Attachment to EIR Text Revisions, of the Final EIR, finds that the aesthetic impact would be significant and unavoidable.

D-1.14 As described in the text revisions to Chapter 5.0, Alternatives, in Chapter 3.0 EIR Text Revisions, of the Final EIR, the proposed residential development located north of Seymour Street would have backyards subject to exterior noise criteria. The future noise environment would exceed the exterior noise criteria by up to 7 dBA at the nearest residential structure adjoining Cabrillo Highway. To meet the exterior noise threshold, additional noise control measures would be implemented. The optimal measure for noise reduction would be to construct a sound wall or a specially-designed barrier fence capable of reducing noise levels by at least 7 dBA, which would be subject to review and approval by the City. In recent years, this approach has been successfully implemented on several parcels adjacent to SR-1 to establish reduced exterior noise environments for portions of residential yards. Such fences and/or walls were found to be aesthetically in context along the Town Boulevard corridor and were subjected to Architectural Advisory Committee review in advance of Planning Commission approval.

D-1.15 As described in Appendix C, Air Quality and Greenhouse Gas Assessment, the U.S. EPA ISCST3 dispersion model was used to calculate concentrations of diesel particulate matter (DPM) and fine particulate matter (PM_{2.5}) at the location of existing sensitive receptors in the vicinity of the project construction sites. The ISCST3 dispersion model is a BAAQMD-recommended model for use in modeling these types of emission activities for CEQA projects. Emission sources for the construction sites were grouped into two categories: exhaust emissions of DPM, and fugitive PM_{2.5} dust emissions. The modeling used a five-year data set (2001 - 2005) of hourly

meteorological data from Fort Funston, San Francisco that was prepared by BAAQMD for use with the ISCST3 model. This is the closest meteorological monitoring station and adequately characterizes meteorological conditions for coastal areas along the San Francisco Peninsula. Annual DPM and PM_{2.5} concentrations from construction activities during the construction period were calculated using the model. DPM and PM_{2.5} concentrations were calculated at nearby sensitive receptors. Receptor heights of 1.5 meters (4.9 feet) were used for nearby residences. Results of this assessment indicated that the construction maximally exposed individual (MEI) was located at a multi-family residence east of the project site across Main Street. Table 4.3-6 in Section 4.3 of the Draft EIR summarizes the maximum cancer risks, PM_{2.5} concentrations, and health hazard indexes for project related construction activities affecting the closest sensitive receptor before and after the implementation of required toxic air contaminant (TAC) reduction strategies to meet EPA and CARB Hazard Index levels and BAAQMD Thresholds. With the required implementation of Mitigation Measure AQ-2, the maximum excess residential cancer risk would be below BAAQMD single-source threshold of 10 in one million and would not expose sensitive receptors to substantial pollutant concentrations, thereby maintaining this impact at less than significant.

D-1.16 As explained in Section 4.3, Air Quality, of the Draft EIR, the project would include a 300-kilowatt emergency generator that is powered by a natural gas engine. Emissions from the testing and maintenance of the proposed generator engine were computed for a 448-horsepower natural gas engine (based on the generator engine specifications provided). The CalEEMod modeling assumes 50 hours of annual operation for testing and maintenance purposes per year. Given that the generator would only be used in emergencies and during testing/maintenance, the generator would not significantly contribute to an increase in greenhouse gas emissions.

D-1.17 Impacts to wetlands is discussed in Section 4.4, Biological Resources of the Draft EIR. Section 4.10, Hydrology and Water Quality, of the Draft EIR, describes stormwater flows with implementation of the project, and indicates that project design would include a dual treatment system of self-retaining landscape areas and bioretention areas along the west side of the project site. This treatment would prevent polluted stormwater from entering wetlands, degrading surface water quality, or negatively impacting groundwater quality. Please see comment responses D-1.3, D-1.5, and D-1.11, regarding hydrological impacts.

D-1.18 Impacts to migratory birds are analyzed in Draft EIR Section 4.4, Biological Resources of the Draft EIR. Tree removal, vegetation clearing, or disturbance in the immediate vicinity of a nest in active use could result in abandonment of the nest or loss

of eggs and young, which would be a violation of the Migratory Bird Treaty Act. Mitigation Measure BIO-1f requires that a pre-construction survey be conducted for construction work between February 1 and August 15. If nests of either migratory birds or birds of prey are detected on or adjacent to the site, a no-disturbance buffer shall be established in consultation with the CDFW.

Further, Section 4.4, Biological Resources, of the Draft EIR, indicates that, due to its small size and the predominantly non-native vegetation that dominates the project site, the site does not provide high-quality habitat for migratory birds in comparison to more natural areas with native trees and vegetation to the east and west. Migratory birds flying over or along the coastline may use the site as a stopover site for refueling and deposition of fat reserves to continue migration, but they are expected to do so in small numbers due to the marginal habitat quality.

D-1.19 The project was found to be consistent with LCLUP Policy 5-71 (See Chapter 4.13, Population and Housing, Table 4.13.3). The proposed hotel would offer new accommodations and would not replace any existing low-cost rooms. The project would provide bicycle rentals and a new trail segment. Through the permitting process, the City will review the project's provision of public benefits to ensure compliance with this policy in collaboration with the California Coastal Commission staff. Also note that in comparison to the Original Project, Modified Alternative 2 provides a much more detailed proposal for how the Proposed Project will address the provision of lower-cost visitor accommodations with a combination of lower-cost rooms and no-cost visitor-serving amenities available to the public in accordance with the Half Moon Bay LCLUP Policy 5-71.

As described in Impact CUL-1, no known historical or cultural resources are documented at the project site, but there is always a possibility that an unknown site may exist in the project area and could be discovered during grading, excavation, or construction. Indicators of historic resources include glass, metal, ceramics, brick, wood, and similar debris. Mitigation Measure CUL-1 requires the project proponent to consult with the City prior to commencement of ground-disturbing activities and retain a qualified tribal monitor. In addition, in the event that any prehistoric, historic, archaeological, or paleontological resources are discovered during grading/excavation, a professional (historian, archaeologist, and/or paleontologist, as determined appropriate and approved by the City) shall be hired to assess the significance of the find and ensure its protection to the extent feasible.

D-1.20 Chapter 4.2, Agricultural Resources, of the Draft EIR provides a discussion of the project's consistency with LCLUP Policy 4-10. The approximately 5-acre project site is mapped for Prime Soils for San Mateo County (Figure 4.2-1). Approximately 2 acres of

the site are or would be devoted to wetlands, wetland buffers, and/or restoration in association with wetlands. The project is therefore required to compensate for the loss of about 3 acres of prime agricultural soils which can be accomplished through a variety of ways. The City will review the applicant's proposed approach to compensation, before considering project approval, to ensure that adequate in-lieu fees or other compensatory mitigation would comply with this policy. Modified Alternative 2, the Proposed Project, provides a much more detailed proposal for how Modified Alternative 2 will address mitigation for the conversion of agricultural land through payment of in-lieu fees in accordance with the Half Moon Bay LCLUP Policy 4-10.

Further, the project site is "not considered significant" using the California Agricultural LESA Model. The project is consistent with the CCA and would not have a significant impact as defined by the California Agricultural LESA Model, the project would have a less than significant impact due to the conversion of existing agricultural lands and no mitigation measures are required by CEQA. Therefore, there would be no significant environmental impact on agricultural resources as defined by CEQA for either the Original Project or Modified Alternative 2.

The California Coastal Act (CCA), Section 30241c, permits the conversion of agricultural land surrounded by urban uses where the conversion of the land would align with other areas with adequate public services and where it will not have significant adverse effects. Separately from the CEQA environmental review process, Policy 4-9 of the City's certified LCLUP anticipates such conversions within the Town Center. Therefore, the project would be consistent with the CCA.

D-1.21 Please see Draft EIR Section 4.16 and Topical Response 3, Hydrology and Water Quality, regarding water supply and water scarcity.

D-1.22 Please see Topical Response 3, Water and Hydrology, regarding stormwater runoff.

D-1.23 The impact of existing noise sources on the project and its users is not an effect that is included in the thresholds of significance derived from the Environmental Checklist in the California Environmental Quality Act (CEQA) Guidelines Appendix G. However, the analysis in Section 4.12, Noise & Vibration, of the Draft EIR, concludes that a significant impact would occur if project-generated traffic increased levels by 3 dBA CNEL or more (equivalent to doubling the existing traffic volumes along a roadway). Because the traffic volumes along SR-1 and Main Street would not double due to operation of the project, the future noise environment at the residences would not increase by 3 dBA CNEL compared to existing conditions. Therefore, operation of the project would not result in a permanent noise increase at existing noise-sensitive

receptors in the project vicinity due to increased traffic levels. Refer to Chapter 4.12, Noise and Vibration, Impact NOI-1 for more information regarding project related noise impacts.

D-1.24 Several methods for reducing noise for the four-lot subdivision that is part of Modified Alternative 2 are described in Appendix 3.0-A, Attachment to EIR Text Revisions, of the Final EIR, including the implementation of noise insulation features would reduce interior noise levels, construction noise control plans, noise buffer setbacks, and the installation of sound walls. Modified Alternative 2 includes the creation of a four-lot subdivision, on the north side of Seymour Street on the 1.15-acre parcel owned by the project applicant, for future residential development of up to 16 units. Future development of the four-lot subdivision would require a coastal development permit, the consideration of which would include design review and LCLUP Policy consistency assessment. Any methods for reducing noise would be subject to the City's Noise Ordinance (Municipal Code 9.23, Noise), review and approval by the City.

D-1.25 Please see Topical Response 1, Traffic, regarding traffic analysis and methodologies.

The intersection level of service results representing typical weekday and weekend conditions are listed in Draft EIR Tables 4.15-9, 4.15-10, 4.15-11, 4.15-13, and 4.15-14.

D-1.26 The study area is served by SamTrans routes 17, 18, 294 as well as paratransit service for passengers with special needs. A discussion of public transportation services in the study area is discussed in Appendix H, Traffic Impact Study, and Section 4.15.1, Transportation and Traffic (pages 4.15-5, 4.15-12 of the Draft EIR).

Prior to the start of construction activities, the contractor will prepare and submit a detailed construction management plan for City approval. The construction management plan will indicate the days and times of construction, the duration of each construction activity, where workers will park, truck haul routes, the number and type of trucks that will access the site during each construction activity, and other details. The City will require adequate access for all transportation modes, including public transit and especially emergency vehicles, to be maintained during construction. Please see comment response D-1.4 for a discussion of environmental impacts resulting from project development.

D-1.27 This is not a comment on the adequacy or content of the environmental analysis in the EIR but is noted and will be provided to decisionmakers through the publication of this Final EIR.

Public Meeting Comments

Comment Letter E-1, Main Street Park



Main Street Park: Hyatt Project and Draft EIR Information Session

Date: August 31, 2022, 6:00 p.m. – 7:15 p.m.

Location: Main Street Park Community Room

Information Session Purpose: The City reached out to the Main Street Park community during the Draft EIR circulation period to accomplish the following:

- Ensure that Main Street Park residents are engaged in the project review process including the EIR and public hearings including meeting dates, and various process points
- Provide an overview of the project and its various alternatives as considered in the Draft EIR
- Receive input from Main Street Park community members by including their questions, concerns, and preferences.

Meeting Overview: Midpen Housing staff / property management hold monthly meetings with residents regarding various matters of the community's interest. The Hyatt Project and Draft EIR Information Session was conducted as part of this regularly scheduled monthly meeting on August 31, 2022. Jill Ekas, Community Development Director, attended on behalf of the City. The project developer, Greg Jamison, was present to field questions.

The meeting was conducted in Spanish with English translation. During the session, City staff took flip chart summary notes in English, and the Spanish interpreter and bilingual attendees confirmed accuracy of the information. In addition to two MidPen Housing staff members, there were 16 community member attendees. Large display boards depicting Alternative 2's site plan and elevations were provided.

Meeting Agenda:

1. City: Staff provided a handout to all attendees (see attached) and a hard copy of the EIR to the MidPen staff. Staff covered the following topics:
 - General Project Description, noting that the applicant is putting forward Alternative 2
 - Overview of the EIR process
 - Information about how to participate in the project review process, including commenting on the EIR
 - Explanation about how comments will be considered (e.g. some will pertain to the EIR and environmental review, others will be applicable to the project in other ways) and that all input is important to the City.
2. Applicant: The applicant presented additional information about the proposed project and highlighted the bike path and rental facility, employment opportunities at the proposed hotel, and the inclusion of 4 to 6 affordable residential units in the housing proposed north of Seymour Street in Alternative 2.

3. Community Member Input: Community members were encouraged to ask questions and provide input. The flip chart notes are attached to this summary, and more detailed notes from the discussion are presented below:
- Questions/Answers:*
- E-1.1 Q. Could this development affect rent at Main Street Park because of the jobs at the hotel?
A. Possibly because household income affects rent.
- Q. Is there a survey for giving input?
A. No, however, all input given in person (such as at this meeting), or in writing (such as via email) will be accepted and considered.
- Q. How many parking spaces are for guests? Will there be employee parking? There is concern about overflow parking onto Main Street if guests have two or more cars?
A. Alternative 2 has 108 spaces for a hotel with 102 rooms.
- Discussion Topics:*
- E-1.2 • Rent: Concerned about potential for rent increases; however, also appreciate employment opportunities.
• Affordable Housing: Appreciates that 4 to 6 of the 16 to 20 units on the north side of Seymour are proposed to be affordable.
- E-1.3 • Traffic: Interested in the shuttle service; concerned that traffic will be works on Highways 1 and 92 on the weekends.
• Parking: Main Street Park does not have enough on-site parking, and residents rely on public street side parking spaces for overflow. Both sides of Main Street are fully parked at night. The hotel parking must have adequate capacity for guests.
- E-1.4 • Jobs: Prefers local higher. Interested in the type of employment opportunism. The applicant confirmed that approximately 25 fulltime positions, and some parttime positions, including restaurant, front desk, and a range of service positions, would be created by the hotel project.
• Views: Staff explained that views of the western hillsides were a subject that had received a lot of input from other community members. This topic did not come up in this meeting. One participant noted that the hotel would screen views of the cars on Highway 1 and that this was a benefit.
- E-1.5 • Neighborhood Character: Staff asked the attendees if they had any particular concerns or preferences related to design, the size of the proposal, or other aspects of the development and how they might affect neighborhood character. Other than the specific issue about parking, noted above, no other comments were made about this topic or project design.

At the end of the session, staff offered to meet with interested parties should they have follow-up questions. The MidPen Housing staff indicated that they had City contact information and would arrange for follow-up sessions should there be interest.

City of Half Moon Bay Meeting Handout - English
Hyatt Draft Environmental Impact Report Available for Review

The proposed Hyatt Place project has been under design and environmental review for several years. This private property development proposal has not yet been approved. Currently, the Draft Environmental Impact Report (EIR) is complete and available for public review. The Draft EIR evaluates the “Project” as originally submitted to the City. The Project includes a 129-room hotel. The applicant’s preferred alternative, introduced in June 2021, is evaluated in the Draft EIR as Alternative 2.

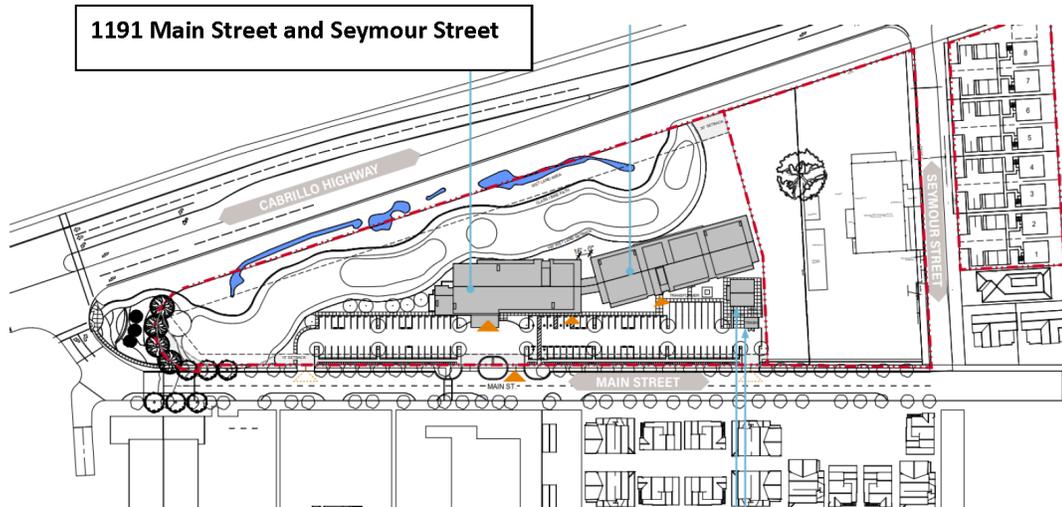
Alternative 2 includes the following:

- 102-room hotel, including the following:
 - Two main buildings: One 3-story building, and one 2-story building, incorporated conference rooms
 - Wetland restoration
 - Multi-use bicycle and pedestrian path, bicycles and facilities and EV charging stations
- Expansion of the existing auto dealership to the south
- Subdivision for duplex development on the north side of Seymour Street

The Draft EIR is available as follows:

- City website: [Project Proposal for Hyatt | Half Moon Bay, CA \(half-moon-bay.ca.us\)](https://www.halfmoonbay.ca.us/projects/hyatt)
- Hard copies at the Half Moon Bay Library (620 Correas Street) and Half Moon Bay City Hall (501 Main Street)
- Hard copies and CD format copies for purchase (at the actual cost of copying). Contact the Community Development Department at 650-726-8270 to order a copy.

Comments on the adequacy of the Draft EIR may be submitted in writing during the 60 day comment period. **The deadline for written comments is Tuesday September 13, 2022 by 5:00 PM at City Hall or via email at hyatthotel@hmbcity.com.** Sign up for project updates (click on email registration page and then on Hyatt Project Notification): [Email Newsletters & Other Periodicals | Half Moon Bay, CA \(half-moon-bay.ca.us\)](https://www.halfmoonbay.ca.us/newsletters)



City of Half Moon Bay Meeting Handout - Spanish**Informe preliminar de impacto ambiental de Hyatt disponible para revisión**

El proyecto Hyatt Place propuesto ha estado bajo diseño y revisión ambiental durante varios años. Esta propuesta de desarrollo de propiedad privada aún no ha sido aprobada. Actualmente, el Borrador del Informe de Impacto Ambiental (EIR) está completo y disponible para revisión pública. El Borrador del EIR evalúa el "Proyecto" como se presentó originalmente a la Ciudad. El Proyecto incluye un hotel de 129 habitaciones. La alternativa preferida del solicitante, presentada en junio de 2021, se evalúa en el Borrador del EIR como Alternativa 2.

La **alternativa 2** incluye lo siguiente:

- Hotel de 102 habitaciones, incluyendo las siguientes:
 - Dos edificios principales: un edificio de 3 pisos y un edificio de 2 pisos, alas de conferencias incorporadas
 - Restauración de humedales
 - Vía peatonal y ciclista de usos múltiples, bicicletas e instalaciones y puntos de recarga de vehículos eléctricos
- Ampliación del concesionario de automóviles existente hacia el sur
- Subdivisión para desarrollo de dúplex en el lado norte de Seymour Street

El borrador del EIR está disponible de la siguiente manera:

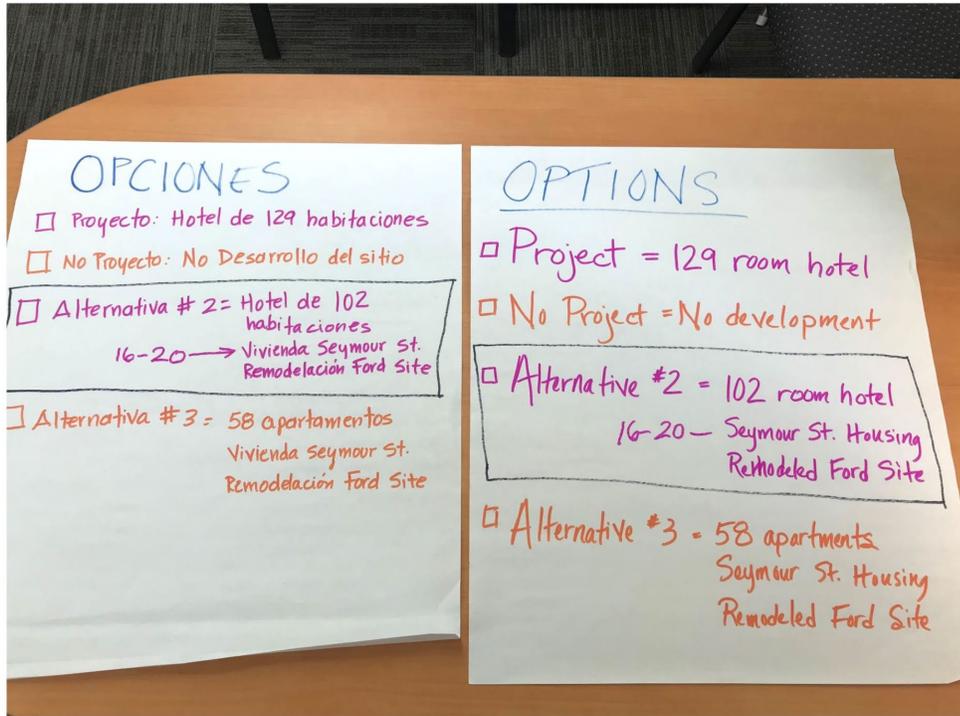
- Sitio web de la ciudad: [Project Proposal for Hyatt | Half Moon Bay, CA \(half-moon-bay.ca.us\)](https://www.halfmoonbay.ca.us/project-proposal-for-hyatt)
- Copias impresas en la Biblioteca Half Moon Bay (620 Correas Street) y el Ayuntamiento de Half Moon Bay (501 Main Street)
- Copias impresas y copias en formato CD a la venta (al costo real de la copia). Comuníquese con el Departamento de Desarrollo Comunitario al 650-726-8270 para solicitar una copia.

Los comentarios sobre la adecuación del Borrador del EIR pueden presentarse por escrito durante el período de comentarios de 60 días. **La fecha límite para enviar comentarios por escrito es el martes 13 de septiembre de 2022 a las 5:00 p. m. en el Ayuntamiento o por correo electrónico a: hyatthotel@hmbcity.com**

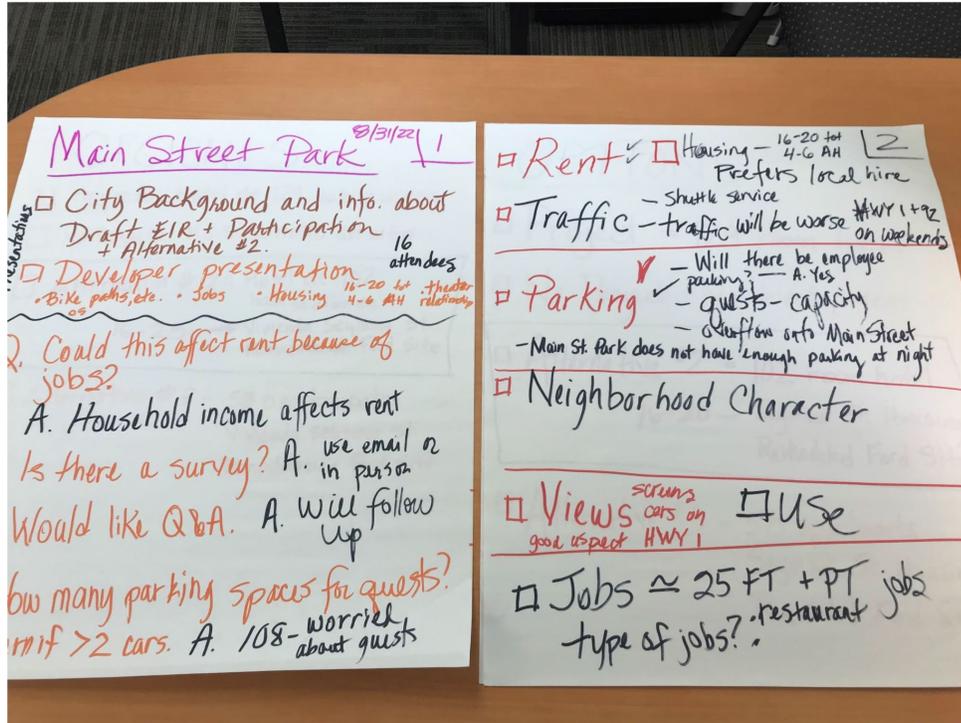
Regístrese para recibir actualizaciones del proyecto (haga clic en la página de registro por correo electrónico y luego en Notificación del proyecto Hyatt): [Email Newsletters & Other Periodicals | Half Moon Bay, CA \(half-moon-bay.ca.us\)](https://www.halfmoonbay.ca.us/newsletters)

Por favor vea el Plano del Sitio al otro lado de la página.

E-1.6



E-1.7



Response to Commenters Letter E-1: Main Street Park

E-1.1 The comment summarizes the comments made during the Public Meeting held with Main Street Park Residents. The subsequent comments and corresponding responses reiterate topics summarized in E1.1.

E-1.2 The project's impact on rent levels is not a physical effect on the environment and does not pertain to the adequacy of the environmental review in the Draft EIR, As stated in the comment, Alternatives 2 and 3 analyzed in the Draft EIR both include housing components. Regarding employment created by the project, please see comment response E-1.4.

E-1.3 As stated in Section 4.15, Transportation and Traffic, of the Draft EIR, evaluation of parking impacts is not required under CEQA. However, the City will be evaluating parking as part of the application process for the project, and a parking discussion is available in Appendix H, Traffic Impact Study, of the Draft EIR. Please see Topical Response 1, Traffic, regarding traffic impacts.

E-1.4 As described in Chapter 3.0, Project Description, of the Draft EIR, operation of the project would employ up to 30 people, which would be an addition employment into Half Moon Bay because the project site is currently vacant.

E-1.5 Please see Topical Response 2, Aesthetics, regarding impacts to visual quality.

E-1.6 This comment includes a photo, which provides a summary of the open discussion held during the meeting. No new topics were raised. Please see responses to comments E-1.2 through E-1.5 for a discussion of project alternatives. The comment is not related to the adequacy of the Draft EIR but depicts pictures of the collaborative notes taken during the meeting. Please see Topical Response 1, Traffic for a description regarding traffic congestion concerns.

Please see Topical Response 2, Aesthetics for a description of impacts to visual quality.

Comment Letter: E-2, Half Moon Bay Planning Commission

August 9, 2022 Half Moon Bay Planning Commission

Item 1.A – Public Comment Portion

1.A Hyatt Place Hotel Project – Draft Environmental Impact Report

Receive a presentation, hold a public hearing, and receive comments on the Hyatt Hotel
Draft Environmental impact Report (EIR)

PARTICIPANTS:

COMMISSION

David Gorn, Planning Commission Chair

STAFF

Bridget Jett, Planning Analyst

Jill Ekas, Community Development Director

PUBLIC

Kathy Catalano

Carlisle Ann Young

David Pasternak

Judy Taylor

Larry Ganderlman

Hazel Joanes

Rick Southern

Leslie Hunt

Brian Holt

Jim Mercurio

Paul McGregor

Roy Salume

David Eblovi

Chad Hooker

GORN I would like to open public comment. Bridget.

JETT Okay, I'm seeing a few people raising their hand. I just wanted to reiterate, the virtual hand is very helpful and that if you need to, if you're on the phone, because we do have a couple phones, *6 to mute and unmute and *9 to raise and unraise your hand. So, we will get started here, just wanted to let everyone know.

GORN And there is a time limit...

JETT Yes, three minutes. And I'll set the time. Okay, so it looks like people are coming in. Alright, so the first person I have is Kathy Catalano and I will allow you to speak.

And next in line will be Carlyse or Carly Anne Young is in the next one up. Go ahead Kathy.

- CATALANO | I've lived in Half Moon Bay for over 30 years and I'm concerned about, it was stated that there are 102 rooms and 108 parking spots. And I don't know if any of you are aware in the picture, one of the pictures, she showed one car on Main Street. If you drive down there on any given day or evening, cars are parked on both sides of the road all day and into the evening. So, if they're concerned about the parking, where are all these people going to park? And, I'm also, that is a big concern of mine. The second thing is I like the open space of that area there and the third thing is that this hotel looks like any other Hyatt Hotel. It would seem to me that there could be some, or could have been or could be some creativity in the design of this hotel. It just reminds me of what's across the street at Cameron's, that big ugly hotel over there and I don't know how these hotels are getting passed to build but you know, we will have two book end ugly hotels. And I'm also concerned about the traffic going in and out, that configuration that's just been put in, you know with the light and all that, is an accident waiting to happen and all it will take us a couple lawsuit. So I prefer to see open space. You know we have enough people coming in to Half Moon Bay and it has not been addressed about the parking. Where is, where are those people going to park? People at Main Street housing cover both sides of the road and they have adequate parking in the back which they supposedly they use. So I'm just really, and I'm concerned about the height of this monstrosity. It's, I don't know, if this passes, somebody's hands are going to be greased, that's for darn sure. Anyway that's what I've got to say. I appreciate you listening and I appreciate the hard work that you all put in. Thank you.
- E-2.1
- E-2.2
- E-2.3
- E-2.4
- GORN | Thanks for waiting. I appreciate that.
- JETT | Okay, next we have Carlisle Anne Young. And after her or him will be Alex Pasternak will be after.
- YOUNG | Thank you. I didn't get a chance to read through the entire EIR but I did watch your presentation tonight and in Jill's presentation the second building had no height listed and that was the taller 3 story building. So if you could, you know, shout out what that was it would be great. In one of those slides, or presentations, I think it was View No. 4, that looked like a sound wall. I'm sorry I think that was in the virtual guys presentation. Maybe it will look prettier in normal, once the thing gets built. But the main thing I want to talk about tonight and I don't even know if this is really part of the EIR but I really feel it should be. And that is I'm very concerned about the unavoidable impact of evacuation capabilities for the entire
- E-2.5

E-2.5
Cont.

mid-coast. I live in Moss Beach and there's only one way out up north and that's through this narrow little Highway 1 and the Devil's Slide tunnel in Pacifica and then the other way to leave town is over 92 and both get really clogged on weekends. So this is a visitor serving hotel, as I am assuming. But back in January of 2022, a Lake County Judge denied the approval of a large resort project called Ganach because he felt County planners had failed to provide appropriate consideration of local emergency evacuation in a fire prone area. Well, I don't know if the developer knows but we had a very bad fire just south of here in La Honda and Pescadero etcetera on the south coast. Back when the Half Moon Bay land use update was finalized and rolled out closer to the beginning of COVID, I don't remember when exactly but I'm sure you guys know I noted that it seemed that the emergency evacuation did not seem to be a component of the land use plan and I felt that might be negligence due to all the proposed increased density. So, I noticed that each project on the Midcoast that gets approved, it's up and down the coast, always gets approved in a vacuum without considering the cumulative effect of the increase in population, visitors and vehicles of all the projects combined. I mean that even includes the big Tunitas Creek Beach project that the County Parks is planning. So, I don't know if that's in your EIR, in the fine print that I haven't gotten to yet but mostly my concern is that the lack of any cogent existing emergency evacuation plan seems to be negligent in the planning process. When I last brought this up several years ago, I was told that a different city plan was coming. So at that time, the then current plan would be to evacuate in place by the city manager. So could you address where in the analysis I can locate where this might be? Thank you.

CHAIR Thank you very much. Bridget.

JETT Yes, next person is Alex Pasternak.

GORN Alex, you're up. Alex, are you there?

PASTERNAK Hello, can you hear me? Can you hear me?

GORN Yes, I can hear you now.

E-2.6

PASTERNAK This is not Alex Pasternak. This is David Pasternak. Alex is our 41 year old son who came from the hospital back to the same residence where we are now on the coastside, which gives you a sense of our continuity here. I previously provided commentary and I submitted a detailed statement focusing on the traffic issue in particular and I trust that you will be reviewing that. My basic point there was that you really need to go back and look carefully at the analysis because it seems to me to be leaving out some basic factors. Most notably, the baseline dealing with the morning commute. As we all know, who live on the coast, that is not when we have the major traffic. It's weekends, late afternoon, when we don't even have

E-2.6
Cont. gridlock, we often have just complete stoppage of any traffic. I note in my written comments that one of my neighbors had to go over Tenias Creek when she went into labor. Fortunately she had her baby at the Kings Mountain Fire Station but you don't want to have people jeopardizing their welfare because we are gridlocked and it's only going to get worse. So I think you need to go back and look at that. I think there's some odd assumptions there, something which has identified as counterintuitive by your own analysts, counterintuitive saying that, in fact, this development may reduce traffic problems. But again, those are contained in my written statements. I want to go back thought, focus on a statement made by I think one of the first speakers which was essentially don't look at the details. The details seem to be trying to put lipstick on a pig. We're talking here about more basic aesthetic. We're talking about people on the coastside who cherish this environment we live in, who appreciate the small town character, the views, the openness. And there is absolutely no way that you can mitigate the problems, the hideous problems that are going to be created by having a large structure as our gateway. And we all recognize that. I'm not sure of the legal authority you have to permit a development which is recognized as having problems that can't be mitigated, but that's acknowledged. You may be able to airbrush it a little bit with the second alternative but the bottom line is you really don't want to have as your legacy as Planning Commissioners something which the community rejects, something which is an eyesore, something which is going to be seen as absolutely inappropriate to our environment. So, I think you have to go back and look at this more carefully. There is going to be development in one form or another but you really have to be cautious how you approve that. Thank you.

E-2.7

GORN Also, we did get your letter. So, thank you. You're thoughtful letter. Alright.

JETT Next, we have is Judy Taylor. Following that will be Larry Gatlin. Go ahead Judy.

TAYLOR Good evening. Can you hear me?

JETT Yes.

TAYLOR I've been out of synch with my speakers before. I'm going to be real short tonight.

GORN That was really short.

JETT Hold on. She go muted. (Laughter) Judy, there you go. Sorry about that.

GORN Start again.

JETT There you go. Go ahead. You have the floor.

TAYLOR My digital karma sucks. Basically, you know how many years, applicants came in with something and they had to run a gauntlet and it was an exercise in masochism so if it's really refreshing to hear thoughtful responses from the Commission and from the public. One of the things we have to remember when we're looking at these kinds of projects is that we who live here on the coast side are a pestilence as far as the Coastal Commission is concerned. The sooner they can get rid of us, the better. Our land uses are to be designated to make the coast side more attractive, and more accessible to the people in Fresno, not for the people who live here. And it's a pox on our local community when it comes to local control and I really appreciate what this applicant has done to try to address what the community is wanting while recognizing that there is very little latitude and what they can do with the property. So, I just want to thank you for it and encourage you to keep working. Something is going to get built there. This is a property owner that cares about our community. I'd much rather see them do this project than somebody from outside the community. And so I would just encourage you to keep working with the applicant to make something that that's as good as it can be. So, thank you.

E-2.8

GORN Thank you.

JETT Thanks Judy. Next we have Larry Ganderlman followed by Hazel Joanes.

GORN Larry Ganderlman.

GANDERLAM Thank you. Can you hear me now?

JETT Yes.

GANDERLAM So, like the former caller, I've been a resident of Half Moon Bay for thirty plus years. I live very close to the project site. I lived over on Arroyo Leon for the better part of 15 years and I've been following this project and what the applicant has been trying to do for the better part of six years. So, again, Half Moon Bay is always going to have the traffic issue. It's always going to have the emergency egress issue. As a resident of Half Moon Bay those are some of the things that you accept when you move to Half Moon Bay. You accept the traffic, you accept a variety of things balanced by the community and a great place to raise your family. These are long term issues that this applicant is not going to solve. So, again I've seen this applicant go through multiple iterations of this project, listening to the community, listening to some of the people with unwarranted bashing of the project yet he's continued to do everything you can to address these, to change the aesthetics of the project and again here we are six years later, and again with an 18-month construction schedule, plus taking the documents from SD all the way through construction documents to permitting, it's a ten year commitment to him. So, again, there are always going to be people that are going to be against it but at some

E-2.9

- E-2.9 Cont. point this really needs to move forward. The southern Gateway, in my opinion, really isn't a southern gate. Right, we have the one little statue there that represents your entry from the south to the north into Half Moon Bay and I think we can do better than that. And again, you know, the lifeblood of those folks that are on Main Street that are the merchants, can use those visitors to support their shops, to support their stores. So again, you want a vibrant Main Street, you're going to need people there that support them and again locally you try and support them but that's not enough and again you know I would just request that you support this project because Half Moon Bay needs it.
- GORN Thank you very much.
- JETT Next we have Hazel Joanes followed by Rick Southerland.
- JOANES Hello, my name is Hazel Joanes and I am a resident of Half Moon Bay for the last 20 years. I have many more comments than what I'm going to present today but I'd like for you to consider these few at this point in time. I'll go right to the point. The staff report states that the purpose of this meeting today is to receive comments on the draft EIR which will lead to the preparation of the final EIR and public hearing to consider certification of the EIR, adoption of CEQA findings, and approval of the project. This one and only meeting to receive public comments is 36 days premature. The DEIR comment period ends on September 13, 2022. The City might consider hosting several public forums in the various HMB neighborhoods to allow the public ample time to review the DEIR, ask questions and then provide their comments to the Planning Commission. Only after the City has proactively solicited community engagement and after the DEIR period has ended should the City begin the preparation of the final EIR. My next comment is, the staff report also states that the EIR must analyze a no project alternative as well as a reasonable range of project alternatives. However, the alternatives must also reflect feasible build project alternatives. Could the applicant at this point in time consider additional, feasible alternatives that don't result in significant impacts or and perhaps result in minor impacts or is this project bound by the highest, Hyatt Place standard design? My next question is regarding the Hyatt Place project. Is this applicant bound only by the Hyatt Place Hotel or if the City also entertaining other proposals by other Hotel Enterprises? Why are we only considering the Hyatt brand with the Hyatt Grand Design? And then the next question is how did the City determine that this hotel brand will provide the lowest-cost, low cost accommodations. Apparently this is one of the city priorities that this alternative was measured against and what is the price point for low-cost accommodations? The Santa Cruz Hyatt Place ranges price point ranges between \$419 and \$481. Is this considered low cost accommodations for let's just say people in Sacramento or Fresno or wherever else these people are coming to enjoy the coast. So I'd like to consider that. Explain the specific terms on how the hotel meets the City's objectives on lower-cost Coastal access. Thank you.
- E-2.10
- E-2.11
- E-2.12

- CHAIR Thank you Hazel. And thanks for getting that in right under the wire. That was really good.
- JETT Next we have Rick Southern. Followed by Leslie.
- CHAIR Rick Southern, you're up. Are you there?
- JETT There he is.
- SOUTHERN Are we good?
- JETT Yep, go ahead.
- SOUTHERN | Alright. Good. Thank you. I just have a question for Jill. I read the executive
E-2.13 | summary and it seemed like there were a lot of areas that were significant and
unavoidable impacts but you mentioned in your presentation that Alternative 2 did
not have a significant and unavoidable conflict with the land use plan. I wanted to
get further clarification on that.
- GORN That's something that will happen during our deliberation. The Planning
Commission is going to talk.
- SOUTHERN | So just some further comments on the project. I am sympathetic to Mr. Jameson
for spending many, many years trying to get this project through and you know it
speaks to me on that is that maybe it's just not the right project for Half Moon Bay
and for the piece of property that the project is being designed for. And when you
showed the views of the Alternative 2 and then you expanded the space between
E-2.14 | the two buildings from 16 to 32 feet, the difference was almost imperceptible which
is visually because of the magnitude of the project. It's kind of like trying to put a
whale into an aquarium and I think that's probably one of the reasons why it's been
so difficult to get the project through. It just doesn't fit with the stipulations that are
put forward in the Half Moon Bay land use plan. So, that's my comment. Thank
you very much.
- GORN Okay, thank you.
- JETT Okay, let me see. We have next is Leslie, followed by her will be Brian Holt. So,
Leslie you should be able to unmute. There you go.
- HUNT I'm Leslie Hunt. I'm sorry I didn't have my last name. I've lived here with my family
for over 30 years so I'm pretty familiar with the coast side. I've lived in Moss Beach,
Miramar and have been on Kelly Street since 1991. I do agree with a lot of the
E-2.15 | people that have commented so far. But first of all I'm really surprised that the only

- E-2.15
Cont. significant impacts that were identified by the EIR were aesthetic. And again I agree with the last caller or commenter, I think the view corridor is kind of ridiculous. 16 feet versus 32 I think that was kind of a ridiculous thing, or change rather. I think the most important impacts, as I agree with Mr. Pasternack, is the traffic issues, storm drainage, and sewage issues. And I don't really understand why these haven't been identified as significant impact in the EIR because we have, many of us on the coast side have identified, have seen and have identified, seen and experienced the great impact that has been expressed by the other commenters on traffic, flooding especially where I live on the west side, and major sewage issues which are hopefully being addressed but I haven't really seen that because even if it's 102 rooms, these people are flushing toilets, taking shower, and the rest of us, I know that there's water allocated for hotels but we are trying to cut back on our water usage so I'm not quite sure about the whole idea of another hotel on the coast side. I know that this is separate from the EIR but I would like to know what the occupancy rates of the current hotels are and do we really need a hotel. And I also appreciate the comment that the first caller said, commented on regarding evacuation plans, like where with these people go. Are they going to go up hill to the Salt Box house? We have to go up to the graveyard.
- E-2.16 Is there enough room for everybody to go up to those areas? That's a little confusing to me and I never really even thought about that before. And in terms aesthetics, I agree with all the other callers, it kind of looks like a barracks or prison to me. And the simulated, I don't think the fellow had enough time for the simulated design because it kind of looked, it was really pathetic. So, thank you and I will send my comments in in writing.
- E-2.17
- GORN Thank you Leslie.
- JETT Okay, next we have Brian Holt, followed by Tom Carey. Go ahead Brian.
- HOLT Thank you very much Commissioners, Bridget and Jill. Good to see you all. Brian Holt. I've been a resident of Half Moon Bay for some 13 years now and I remember when I first moved in to this community attending a meeting at the Trendy Bow over at the Johnston House and all this talk about the need to activate our Southern Gateway and to really activate Main Street to support our local businesses and the need to do that. And I've watched this project over the years and come through and have seen sort of a lot of really thoughtful input that's been put into it, a lot of consternation over the design and the loss of the, or the potential impacts with regards to view of the hills. You know there's a saying in CEQA, you kind of, you attack everything you can, whether its transportation or biology or hydrology and these are things that can be sort of address in litigation and when you lose, or when you can't necessarily attack anything else, you go to the visual resources. You attack the aesthetics of the project and that's because it's a very subjective, right? One person's impact is another person's visual benefit and I would suggest that currently the situation on this site isn't great. It's a fallow field and we're looking
- E-2.18

E-2.18
Cont.

at an auto dealership and I frankly would welcome an attractively designed facility there. And a facility that could support what is an outdoor recreation based economy in this community, something that supports our agriculture through purchasing local food, something that provides visitor services and access to the coast and really that demand is only going to increase. You know COVID-19 and everything else has just really increase demand for public open spaces. Climate change is going to continue to increase demand for people to visit the coast. As it gets hot inland people are going to want to come to the coast side and we're blessed to live here. We are truly privileged and I really think that we have an obligation to welcome and open our community to people who do, who want to visit. And I think we need to do that in a sustainable, thoughtful way by providing development where development makes sense. And development makes sense at this site. And visitor serving uses may not make sense in other places, like west of Highway 1. They may not, we may not want to have short-term rentals in our community. But this is a site that has been zoned and designated for commercial use. This applicant has gone through Architectural Advisory Committee and Planning Commission hearings and received significant amount of public comments. There's going to be a section of this community that are going to oppose any development or is going to continue to have consternation about the design but I think there's a time that we need to step up and actually embrace something and support something and really hone in so, I fully support this project. I look forward to providing additional comments and I thank you all for your service.

JETT Thank you. Next up we have is Tom Carey, followed by Jim Mercurio. So go ahead Tom. You should be able to unmute.

JETT Go ahead time. Oh, you're, there you are. You're unmuted so you can speak. Tom are you there?

GORN We'll wait a second.

JETT Tom, you're unmuted so you can speak. Good? No? Okay I'm going to mute you and if you want to speak you can raise your hand again. I think it may be accidentally. The next person I have is Jim, I'm going to chop his last name. Merchio or Mercio? Go ahead Jim.

MERCURIO Jim Mercurio. I appreciate it. Can you hear me?

JETT Yes, we can. Go ahead.

E-2.19
MERCURIO No worries on butchering the name. It's not the first time. Listen, I'm a longtime resident of Pacifica actually and a frequent visitor to Half Moon Bay. I currently reside in Vacaville. So, I'm one of those guys that brings his family down to Half Moon Bay, is always looking for an opportunity to house temporarily in a hotel

E-2.19
Cont.

situation, and can't always afford the Ritz-Carlton, as great of a property that that is. And I think for years, Half Moon Bay had needed precisely this development that you guys have been brought before you and that is being proposed. So first off I wanted to say thank you to the Commission for your thorough review. Kudos to the applicant for incorporating the suggested recommended changes that all you have made. I think the application and design is quite thoughtful. It's elegant. I hear a lot of these folks thinking that oh my God this looks ugly, it's this big huge monstrosity. I've been watching this project for a little bit and somebody made a comment of hotels, you didn't want the hotel on the coast to look like hotels in Vacaville and I kind of chuckled in the fact that I live there now and I know exactly what you're talking about. So I thought that the application of the design and really you're input has shaped this thing, I think, into such a great opportunity. I look forward to visiting and staying there. I think some of your traffic problems will go away with those of us that do visit, who are going to stay there as a result of it. So, the substantial impact that you guys talk about, I actually think improves your gateway dramatically. I drive Highway 1. I have all my life. And to see that southern view doesn't frighten me. And in terms of the views of you wanting to protect the Ridgeline, I get it but this hotel is something that I think will be well-received especially from visitors outside of your City and to those that commented don't want any development, I understand that too and you're going to get those number of folks that are want to have that view but I really wanted to just stay in tonight and they have thoughts of the commission again. I think your review was thoughtful. I thought the applicants incorporating the suggested recommended changes. I think the changes have been responsible and I just wanted to say thanks for that and thanks for inviting me back to your city. Pacifica was my hometown but I played baseball in Half Moon Bay a little bit growing up as a kid and I look forward to bringing my family to your city and having this opportunity so thanks for your time. I appreciate your efforts in this regard and again congratulations and thank you for being thoughtful in this review.

JETT We do have, Tom Carey did raise his hand again so I'm going to allow him to jump on here. Let me just make one change and go ahead Tom you should be able to unmute now and speak if you'd like to. There you go.

GORN Still can't hear your Tom Carey.

JETT Yeah we're still not hearing you. I don't think you're on your cell. It doesn't look like it but I just want to make sure. You're unraising and raising your hand but you are unmuted so you should be able to talk. Your speakers might not be, under the mute/unmute there's an arrow and you can open it up and it may help you to figure out that you may not be on the right microphone and choose another microphone on your phone.

GORN We still do have a couple of the speaker. Can we come back?

JETT I don't have any other speakers.

GORN Oh, we're waiting for Tom.

JETT Actually, wait, we do have one other, so let me just leave him unmuted and see if he can get his speaker, or his thing and I have, actually multiple people raising their hand now. So let's just continue. Next I have is Paul McGregor. Go ahead Paul. You should be able to unmute.

MCGREGOR Can you hear me?

JETT Yes, I can hear you.

MCGREGOR I'm doing good.

JETT Good.

MCGREGOR I'd like to speak about the Alternate No. 2. It looks to me like they've really gone above and beyond the call of duty to lower it down, push it back, put some separation in between the buildings and actually give you a little more of a view towards the hills and so forth. I drive up from San Gregorio every day. I'm looking at these story poles every time I go by. I've been on this coastside for 40 plus years, 40 years. And this is a good development for the community and actually the Jamison family has really put a good forth effort to bring something really good for the community. The aesthetics of the building have really come along. This is going to give a lot of opportunity for the people that live across the street in the affordable housing to have jobs there. Bike paths, landscaping Highway 1, Main Street and so forth. It also allows people to stay in Half Moon Bay and not be driving over 92 or 84 in my case where I see a lot of people going that way at times. The Jamison family has been here for a long time. I think they should have the opportunity to build their hotel and my hat's off to you guys for listening to everybody and putting a good project forward. Thank you.

E-2.20

GORN Thanks so much.

JETT I'm not sure. I haven't heard from Tom. I'm just leaving him unmuted and if he can work it out, I hope he can. Let me just go to the next person. Roy Salume, you can speak now.

GORN Hey Roy.

JETT Go ahead Roy.

SALUME Can you hear me?

GORN I can hear you Roy.

JETT Yes.

SALUME Okay, great. Thanks. Hi folks. You know, I've watched the development of this project for five years. We have more visitor serving traffic flowing into the coast side every year. It jams up the roads, the neighborhoods to the north of 92 on weekends and the weekdays as well. That traffic burden is not going to stop. We are going to have to deal with it. We do not have huge traffic jams south of town. I think the best way to address our chronic visitor traffic globally is to look for ways to draw more of it to the south of 92 with appropriate visitor serving projects like this one. This project is the right kind of project in the right location to serve the long-term planning needs for the town. I think it moves us in the right direction.

E-2.21

SALUME And, you know, I'll add this, I drive past the property frequently. I think Alternative 2 and the story poles that I see look a lot better than what was the originally presented five years ago. I think it fits and I don't think it's out of scale. Thank you that's all I have to say.

E-2.22

JETT Thank you.

GORN Thanks Roy.

JETT Next I have is Half Moon Bay Bridge which I believe is David Oblovi and I will allow him to speak.

GORN David are you there?

GORN Yeah, sorry. Can you hear me? Okay good. Thank you. Okay sorry I'll change that in my phone and I'm using my phone tonight and that's obviously the wrong identifier. If I can fight with my good friend Roy Salume, I live 2.3 miles south of town and on a busy Sunday I can't drive to town because the traffic is backed up past our home. So, the traffic issue is universal on the coastside. I don't think it's just characterized north or south. That said, I have also followed this project since its inception since the first presentation was made to the Planning Commission service 6 years ago. It seems like forever. And what I have seen and witnessed is a responsible developer working to accommodate the members of the public and the community in which he lives, who lives in the community and is very community-oriented, who has modified the project on countless occasion. The last time I met with Greg he was carrying around custom siding that was recycled, I can't remember if it was barn lumber of fence lumber but basically he was looking at trying to surface the face of the building in natural material that are recycled or recovered. That's his level of commitment to this project and to making it in scale

E-2.23

E-2.23
Cont.

and in scope for the community. If we based every project on whether we liked the way it looks, nothing would ever get built because 50% of people are going to love it, 50% of people are going to hate it and you're never going to get anywhere. Emergency egress, 140 cars in the scope of community-wide evacuation is irrelevant. It's a drop in the bucket. Same thing with sewage. You're not going to fix the sewage problems that Half Moon Bay faces, and they are not trivial, by denying this project from existing especially since it's going to exist one way or the other I'm guessing. Finally a gateway. If that field is an appropriate gateway for the community than the first gateway is way down in Santa Cruz when you hit your first field coming northbound because it's all fields, fields, fields. We do not have a southern gateway in Half Moon Bay. I think it goes without saying that we need one and I think that this project's an incredibly appropriate southern gateway for weary travelers, for people who want to know they actually got somewhere. Doesn't matter. It's an in scope project and I think it's a very appropriate for Half Moon Bay. So I want to thank the Planning Commission, both present and past, for your work on this, staff as well. This has been a long haul and it's not over yet but I hope you're going to get to a place where we'll get this development completed and we can go on from there. Thank you.

JETT Thank you. I'm still not getting Tom. Tom if you can't speak, you can go ahead and put things in writing and send it to Jill or myself or to the Hyatt Hotel email and we'll be happy to share.

GORN And is there anyone else out in the audience who wants to talk? Anybody else wants to speak raise your head now.

JETT I have one more. Chad Hooker.

HOOKER Can you hear me?

JETT Yes we can. Go ahead Chad.

E-2.24
HOOKER I am an AAC member but I'm speaking for myself not the Architectural Advisory Committee, though it's fair to assume I have some awareness of this project because it's been in front of the AAC. What I wanted to speak about the specifically is the Upland Hill, the view shed issue that appears to be in the EIR as a significant and unavoidable impact on these views, the project would have that impact. In my opinion, the view in question has already been largely blocked by two rows of street trees which were required by the City there on both sides of Main Street and the theater and by the two-story affordable housing along Main Street. As an AAC member, when this came in front of us, the southern gateway intersection was being built so I had the opportunity to actually stand in the median of the highway and look at it from the perspective you would have from a car either going north or south. I walked up and down that K-railing and took it a pretty good look at these

- E-2.24
Cont. | views. And I need to mention that there are already very limited by existing buildings and trees, not to mention that this view is from cars moving at a pretty good speed. So, in my opinion, views should or should not be considered in the abstract. The real views of the Upland Hills should be checked out. They are not significantly impacted further by this project and I just wanted to bring that up because I'm certain that it will be in your deliberations this evening. Thanks for your attention.
- JETT Thanks. Okay I think that's all we have. We don't have, not able to pull him so we're back, back to you Chair Gorn.
- GORN I know we haven't actually talked about this but it is a little after 9 o'clock. Do you guys want to take a break or do you want to get started? Taking a break, everybody wants to take a break. Should we take 10 minutes?
- JETT Through the Chair, do you want to close the public hearing?
- GORN Yes, yes. Sorry Tom Carey but we are closing public comment. And we are back to our meeting in which, I think we are going to take a 10 minute break. Do we need to vote on that or can we just do it?
- JETT No you can just do it.
- GORN We'll take a 10 minutes break and come right back.
- RECESS
- EKAS Through the Chair, while we're reassembling here, Bridget has been trying to get Tom Carey back in via phone just to give him a chance, to accommodate him. I don't know if it worked so we'll find out. We are prepared to answer your questions, some of the questions that came up, if you would like us to do that, we can be quick.
- JETT I have been speaking to him and helping him out and he said that he will write in his support. And he is very supportive of the project so he'll get us in his comments.

Response to Public Meeting Comments E-2: Half Moon Bay Planning Commission

E-2.1 As stated in Section 4.15, Transportation and Traffic, of the Draft EIR, evaluation of parking impacts is not required under CEQA. However, the City will be evaluating parking as part of the application process, and a parking discussion is available in Appendix H, Traffic Impact Study, of the Draft EIR. Please see Topical Response 1, Traffic, regarding traffic impacts.

E-2.2 As discussed in Section 4.1, Aesthetics, of the Draft EIR, The project would be consistent with zoning at the project site, the project would be set back from SR-1 and would preserve the open space at the southern end of the site at the City's southern gateway to Downtown.

E-2.3 Please see comment response E-2.1 regarding parking. Please see Topical Response 1, Traffic, regarding traffic impacts. As discussed in Section 4.1, Aesthetics, of the Draft EIR, the project would impact views of the ridgeline. However, consistent with zoning at the project site, the project would be set back from SR-1 and would preserve the open space at the southern end of the site at the City's southern gateway to downtown.

E-2.4 Please see Topical Response 2, Aesthetics for description regarding the height concerns.

E-2.5 Please see Topical Response 4, Emergency Access and Traffic Safety, regarding impacts on emergency access and emergency response.

E-2.6 Please see Topical Response 1, Traffic, regarding traffic impacts and the methodology used to determine the existing conditions baseline for the analysis.

E-2.7 Please see Topical Response 2, Aesthetics, regarding aesthetics impacts.

E-2.8 This is not a comment on the adequacy or content of the environmental analysis in the EIR but is noted and will be provided to decisionmakers through the publication of this Final EIR.

E-2.9 Please see Topical Response 1, Traffic, regarding traffic impacts. Please see Topical Response 4, Emergency Access and Traffic Safety, regarding impacts on emergency access and emergency response.

E-2.10 CEQA does not require public meetings or public hearings at any time during the environmental review process. See CEQA Guidelines Section 15202(a) (no requirement for a public agency to conduct a public hearing in connection with its review of an EIR; public comments may be restricted to written communications.).

Although CEQA does not require public meetings or public hearings during the environmental review process, the City presented the project at the August 9, 2022 Planning Commission meeting and received public comments. Pursuant to CEQA Guidelines Section 15202(e), notice for the Planning Commission public hearing was published in a timely manner, via the City's website. The City also held a public meeting to receive comments at the Main Street Park Community Room on August 31, 2022. The meeting was conducted primarily in Spanish with English interpretation.

E-2.11 In addition to the No Project alternative (Alternative 1), the Draft EIR also analyzed a Reduced Density Alternative (Alternative 2) which has since been modified (see Topical Response 5, Modified Alternative 2), and a Multi-Family Residential alternative (Alternative 3) in Subsections 5.5.1 through 5.5.3 of the Draft EIR. CEQA Guidelines Section 15126.6(c) requires that an EIR identify any alternatives that were considered by the Lead Agency but rejected as infeasible. The EIR must briefly explain the reasons underlying the Lead Agency's determination to reject an alternative. The following factors may be used to eliminate alternatives from further consideration: (i) failure to meet most of the basic project objectives, (ii) infeasibility, and (iii) inability to avoid significant environmental impacts. Please see Section 5.4, Alternatives Considered but Rejected for Further Analysis, and Section 5.4.1, Alternative Site Locations, of the Draft EIR, for information regarding alternatives considered but rejected for further analysis, and alternative project site locations that were considered but rejected for further consideration.

E-2.12 This comment does not pertain to the adequacy of the EIR. Economic effects are not included in the scope of environmental impacts defined under CEQA. Please see comment response C-83.3 for a discussion of visitor demand and descriptions of accommodation costs. Also note that the project was found to be consistent with LCLUP Policy 5-71, which requires new development of higher cost accommodations and/or new development that would fail to provide lower cost accommodations on land where that use is allowed and suitable to provide lower cost accommodations (See Chapter 4.13, Population and Housing, of the Draft EIR). The proposed hotel would offer new

accommodations and would not replace any existing low-cost rooms. City permitting will review the project's provision of public benefits to ensure compliance with this policy. Also see Modified Alternative 2, which includes the applicant's proposal to provide a combination of lower-cost rooms in the hotel as well as visitor-serving support amenities including walking paths available to the public for free.

E-2.13 As described in the text revisions in Appendix 3.0-A, Attachment to EIR Text Revisions, of the Final EIR, Modified Alternative 2 includes a lot line adjustment on the 5.02-acre hotel parcel, adding 0.45 acres to the auto dealership parcel and using the remaining 4.57 acres for the hotel and Open Space. Adding 0.45 acres to the dealership allows for the creation of a four-lot subdivision on the north side of Seymour Street on the 1.15-acre parcel owned by the project applicant, for future residential development of up to 16 units. The parcels associated with the residential development are designated as residential – medium density in the LCLUP, and the site is zoned for residential development in the R-2 (Two family Residential) Zoning District. The existing use of the 1.15-acre parcel, as overflow parking for the dealership, conflicts with the parcel's land use and zoning. However, residential development under Modified Alternative 2 would be consistent with the parcel's land use designation and zoning.

E-2.14 As explained in Table 4.1.1 in Section 4.1, Aesthetics, of the Draft EIR, the Original Project would be inconsistent with LCLUP Policy 9-23, which serves to protect broad views of upland slopes, prominent ridgelines, and other intervening ridgelines as viewed from scenic corridors. This assessment is also related to LCLUP Policy 9-12 which establishes view protections from the Town Boulevard. This was identified as an impact despite incorporation of the following design elements into the project:

- Massing of the proposed 2- to 3-story tall buildings is reduced with a dormer roof form and downward stepping the height towards the southern gateway corner at the South Main Street intersection with SR-1.
- Substantial setbacks from SR-1 reduce visual intrusions into the ridgeline from the SR-1 view including a sizable buffer of at least 100 feet between the proposed structures and SR-1 to avoid impacts to wetlands.

As concluded in Section 4.1, Aesthetics, of the Draft EIR, implementation of the project would still obstruct long range views of the ridgeline, and the Draft EIR found that there is no other feasible measure that would reduce this impact to a less-than-significant level given the mass and scale of the Original Project. Therefore, this impact is considered significant and unavoidable. Following circulation of the Draft EIR, the applicant submitted revised plans to the City indicating that Alternative 2 (with revisions), is now the Proposed Project that would be considered for approval. This Proposed Project is described in the Final EIR as Modified Alternative 2. Modified Alternative 2 would reduce

degradation of existing visual character or quality of the site and its surroundings due to view blockage compared to the Original Project. Please see Topical Response 5, Modified Alternative 2, the Reduced Intensity Alternative. Modified Alternative 2 would be consistent with LCLUP Policy 9-23, because the protected view of the ridgeline (from Viewpoint 3) would not be obstructed by the structures in the same way it is with the Original Project. For further discussions regarding aesthetic impacts and LCLUP policy consistency, refer to Topical Response 2, Aesthetics, and Topical Response 5, Modified Alternative 2.

As described in the text revisions in Appendix 3.0-A, Attachment to EIR Text Revisions, of the Final EIR, Modified Alternative 2 would reduce the significant impacts to scenic vistas and scenic resources within a scenic corridor. This is due to reduced project massing, increased setbacks, and an improved site plan. However, the visual character or quality of the site and its surroundings from Viewpoints 1 and 4 would remain partially obstructed; therefore, the impact for Modified Alternative 2 would remain significant and unavoidable.

E-2.15 Please see Topical Response 2, Aesthetics, regarding visual impacts to view corridors.

E-2.16 Please see Topical Response 1, Traffic, regarding traffic impacts.

As discussed in Section 4.10, Hydrology and Water Quality, of the Draft EIR, construction activities would be subject to a National Pollutant Discharge Elimination System General Construction Permit, issued by the Regional Water Quality Control Board, which would contain water quality control requirements including developing and implementing a Storm Water Pollution Prevention Plan that requires use of Best Management Practices to reduce potential impacts to surface water quality during project construction and operation. Compliance during project construction would prevent erosion, siltation, and flooding on- and off-site, and runoff from the project site from exceeding the capacity of stormwater drainage systems and would ensure that no substantial additional sources of polluted runoff are created. The project design includes a dual treatment system that would receive runoff, preventing the release of polluted stormwater and the prevent impacts on stormwater drainage system during project operation. In addition, project operation would be subject to a post-construction NPDES Permit and Provision C.3 requirements, requiring incorporation of source control design elements to prevent pollutants from entering stormwater. The project design would include a dual treatment system of self-retaining landscape areas and bio retention areas along the west side of the project site. This treatment would prevent polluted stormwater from entering wetlands, degrading surface water quality, or negatively impacting groundwater quality.

As discussed in Section 4.16, Utilities and Service Systems, of the Draft EIR, the City's wastewater collection system includes approximately 35 miles of gravity sewer pipe and 1.5 miles of force main pipeline, as well as three lift stations. The City's system conveys approximately 1 MGD of average dry weather flow to the Sewer Authority Mid-Coastside (SAM) wastewater treatment plant (SAM Plant). SAM's wastewater treatment infrastructure currently has enough wastewater capacity for project operation and has not identified any need for new expanded wastewater facilities.

During project operation, wastewater would be collected by a 6-inch sewer line on the east side of the project site. The SAM Plant would treat wastewater created during project operation. The anticipated rate of water consumption during project operation would be less than 1 percent of the SAM's wastewater treatment dry weather capacity of 4 MGD. In addition, the City's Sewer System Management Plan 2019 Update (SSMP), includes a capital improvement program and a System Evaluation and Capacity Assurance Plan to address sewer system overloads for both dry weather capacity and peak wet weather flows. As the Draft EIR concluded in the analysis of Impact Utilities a), the Original Project would not exceed the existing sewer capacity, and neither would Modified Alternative 2. In addition, the City's wastewater infrastructure is in the process of being upgraded to ensure that spills can be avoided as described in the SSMP. Therefore, both the Original project and Modified Alternative 2 would have a less than significant impact on wastewater facilities.

E-2.17 Please see Topical Response 2, Aesthetics, regarding the project design and visual character. Additionally, please see Topical Response 5, Modified Alternative 2, regarding the residential component of the Proposed Project.

As described in Chapter 4.13, Population and Housing, the project is consistent with LCLUP Policy 5-70, which requires that project proponents consider the carrying capacity of the coast, visitor demand over a range of affordability levels for various accommodation types, and consistency with the LCP, including all applicable LCLUP policies, before approving any new overnight accommodation development proposals. Table 4.13-3, Project Consistency with Relevant General Plan Policies, states that the project site located south of SR-92 is along a span of SR-1 where a 52-room hotel was recently converted to a homeless shelter. Past studies indicate that there is adequate visitor demand on the coast to support the proposed hotel. The Chamber of Commerce cites an average occupancy rate of 68 percent and a need for conference facilities that can support midweek hotel demand which is off-peak from the high weekend demand.

E-2.18 This is not a comment on the adequacy or content of the environmental analysis in the EIR but is noted and will be provided to decisionmakers through the publication of this Final EIR.

E-2.19 This is not a comment on the adequacy or content of the environmental analysis in the EIR but is noted and will be provided to decisionmakers through the publication of this Final EIR.

E-2.20 This is not a comment on the adequacy or content of the environmental analysis in the EIR but is noted and will be provided to decisionmakers through the publication of this Final EIR.

E-2.21 Please see Topical Response 1, Traffic, regarding traffic impacts.

E-2.22 This is not a comment on the adequacy or content of the environmental analysis in the EIR but is noted and will be provided to decisionmakers through the publication of this Final EIR.

E-2.23 Please see Topical Response 4, Emergency Access and Traffic Safety, regarding impacts on emergency access and emergency response. Please see Topical Response 2, Aesthetics, regarding the southern gateway and aesthetic impacts.

E-2.24 Please see Topical Response 2, Aesthetics, regarding aesthetic impacts.

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3.0 EIR TEXT REVISIONS

3.1 INTRODUCTION

This chapter describes revisions to the Half Moon Bay Hyatt Place Project Draft Environmental Impact Report (Draft EIR) in response to comments and initiated by staff.

Changes are organized by chapter and page number, as the text appears in the Draft EIR. An explanation of the change, including a cross-reference to where it is located in the document, is described and presented in italics. Strikethrough text (i.e., ~~strikes through~~) indicates text removed from the draft EIR. Underlined text (i.e., underlined) indicates text added to the Draft EIR.

The text revisions described in this chapter are to the Draft EIR. Therefore, throughout this chapter, the term “project” refers to the Original Project that was analyzed at the time the Draft EIR was published.

3.1.1 TEXT REVISIONS

No existing page reference. Comment Response Initiated Change – The Draft EIR was updated per a comment received.

Acronyms and Abbreviations

Acronym/ Abbreviation	Definition
<u>AAQS</u>	<u>Ambient Air Quality Standards</u>
<u>AB</u>	<u>Assembly Bill</u>
<u>ABAG</u>	<u>Association of Bay Area Governments</u>
<u>ACS</u>	<u>American Community Survey</u>
<u>ADA</u>	<u>American Disabilities Act</u>
<u>ADUs</u>	<u>Accessory Dwelling Units</u>
<u>APN</u>	<u>Assessor’s Parcel Number</u>
<u>BAAQMD</u>	<u>Bay Area Air Quality Management District</u>
<u>BcA</u>	<u>Botella clay loam</u>

<u>Acronym/ Abbreviation</u>	<u>Definition</u>
<u>BIA</u>	<u>Building Industry Association</u>
<u>BMP</u>	<u>Best Management Practices</u>
<u>BPAC</u>	<u>Bicycle/Pedestrian Advisory Committee</u>
<u>CAAQS</u>	<u>California Ambient Air Quality Standards</u>
<u>CAL FIRE</u>	<u>California Department of Fire and Forestry Protection</u>
<u>CAP</u>	<u>Clean Air Plan</u>
<u>CARB</u>	<u>California Air Resources Board</u>
<u>CARE</u>	<u>Community Air Risk Evaluation</u>
<u>CASGEM</u>	<u>California Statewide Groundwater Elevation Monitoring Program</u>
<u>CAA</u>	<u>Clean Air Act</u>
<u>CAAP</u>	<u>Climate Action and Adaptation Plan</u>
<u>CAG</u>	<u>City/County Association of Governments</u>
<u>CAMUTCD</u>	<u>California Manual on Uniform Traffic Control Devices</u>
<u>CAPCOA</u>	<u>California Air Pollution Officers Association</u>
<u>CBC</u>	<u>California Building Code</u>
<u>CCA</u>	<u>California Coastal Act</u>
<u>CCC</u>	<u>California Coastal Commission</u>
<u>CCR</u>	<u>California Code of Regulations</u>
<u>CCWD</u>	<u>Coastside County Water District</u>
<u>CDP</u>	<u>Coastal Development Permit</u>
<u>CEC</u>	<u>California Energy Commission</u>
<u>CEQA</u>	<u>California Environmental Quality Act</u>
<u>CESA</u>	<u>California Endangered Species Act</u>
<u>CFPD</u>	<u>Coastside Fire Protection District</u>
<u>CalEEMod</u>	<u>California Emissions Estimator Model</u>
<u>CalEPA</u>	<u>California Environmental Protection Agency</u>
<u>CalGreen Code</u>	<u>California Green Building Standards Code</u>
<u>CalOSHA</u>	<u>California Occupational Safety and Health Administration</u>
<u>CERCLA</u>	<u>Comprehensive Environmental Response, Compensation and Liability Act of 1980</u>
<u>CG</u>	<u>Commercial - General</u>
<u>CHRIS</u>	<u>California Historical Resources Information System</u>
<u>CH4</u>	<u>Methane</u>
<u>CHP</u>	<u>California Highway Patrol</u>
<u>CIWMA</u>	<u>California Integrated Waste Management Act</u>
<u>CIWMB</u>	<u>California Integrated Waste Management Board</u>
<u>CMP</u>	<u>Congestion Management Program</u>
<u>CMA</u>	<u>Congestion Management Agency</u>

<u>Acronym/ Abbreviation</u>	<u>Definition</u>
<u>CNEL</u>	<u>Community Noise Equivalent Level</u>
<u>CO</u>	<u>carbon monoxide</u>
<u>CO2</u>	<u>Carbon Dioxide</u>
<u>City</u>	<u>City of Half Moon Bay</u>
<u>CNDDB</u>	<u>California Native Diversity Database</u>
<u>CNPS</u>	<u>California Native Plant Society</u>
<u>County</u>	<u>San Mateo County</u>
<u>CRB</u>	<u>Coast Range Biological LLC</u>
<u>CRHR</u>	<u>California Register of Historic Resources</u>
<u>CUSD</u>	<u>Cabrillo Unified School District</u>
<u>CWA</u>	<u>Clean Water Act</u>
<u>CWD</u>	<u>County Water District</u>
<u>dB</u>	<u>decibels</u>
<u>DOT</u>	<u>Department of Transportation</u>
<u>DOF</u>	<u>Department of Finance</u>
<u>DTSC</u>	<u>Department of Toxic Substance Control</u>
<u>DWR</u>	<u>Department of Water Resources</u>
<u>EPA</u>	<u>Environmental Protection Agency</u>
<u>ESA</u>	<u>Environmental Site Assessment</u>
<u>ESHAs</u>	<u>Environmentally Sensitive Habitat Areas</u>
<u>ESLs</u>	<u>Environmental Screening levels</u>
<u>EIR</u>	<u>Environmental Impact Report</u>
<u>EO</u>	<u>Executive Order</u>
<u>FEMA</u>	<u>Federal Emergency Management Agency</u>
<u>FESA</u>	<u>Federal Endangered Species Act</u>
<u>FHSZ</u>	<u>Fire Hazard Severity Zones</u>
<u>FMMP</u>	<u>Farmland Mapping and Monitoring Program</u>
<u>FPPA</u>	<u>Farmland Protection Policy Act</u>
<u>GHG</u>	<u>Greenhouse Gas</u>
<u>GIP</u>	<u>Green Infrastructure Plan</u>
<u>GWh</u>	<u>gigawatt-hours</u>
<u>HCD</u>	<u>Housing and Community Development</u>
<u>HCM</u>	<u>Highway Capacity Manual</u>
<u>H2S</u>	<u>hydrogen sulfide</u>
<u>HI</u>	<u>Hazard Index</u>
<u>HMTA</u>	<u>Hazardous Materials Transportation Act of 1975</u>
<u>HUD</u>	<u>Department of Housing and Urban Development</u>
<u>IEPR</u>	<u>Integrated Energy Policy Report</u>

<u>Acronym/ Abbreviation</u>	<u>Definition</u>
<u>IP</u>	<u>Implementation Plan</u>
<u>lbs</u>	<u>pounds</u>
<u>kBtu</u>	<u>kilo-British thermal units</u>
<u>kWh</u>	<u>kilowatt hours</u>
<u>LEDPA</u>	<u>Least Environmentally Damaging Practicable Alternative</u>
<u>LEED</u>	<u>Energy and Environmental Design</u>
<u>LESA</u>	<u>Land Evaluation and Site Assessment</u>
<u>LCLUP</u>	<u>Local Coastal Land Use Plan</u>
<u>LCIP</u>	<u>Local Coastal Implementation Plan</u>
<u>LCP</u>	<u>Local Coastal Program</u>
<u>Leq</u>	<u>Equivalent noise level</u>
<u>LID</u>	<u>Low Impact Development</u>
<u>Lmax</u>	<u>Maximum instantaneous noise level</u>
<u>LOS</u>	<u>Level of Service</u>
<u>LUST</u>	<u>Leaking Underground Storage Tank</u>
<u>MBTA</u>	<u>Migratory Bird Treaty Act</u>
<u>MGD</u>	<u>Million Gallons Per Day</u>
<u>MMBtu</u>	<u>Million British Thermal Units</u>
<u>mph</u>	<u>miles per hour</u>
<u>MRP</u>	<u>Municipal Regional Stormwater NPDES Permit</u>
<u>MS4s</u>	<u>Municipal Separate Storm Sewer System</u>
<u>MPO</u>	<u>Metropolitan Planning Organization</u>
<u>MT</u>	<u>metric tons</u>
<u>MTC</u>	<u>Metropolitan Transportation Commission</u>
<u>MW</u>	<u>megawatts</u>
<u>MWELo</u>	<u>Model Water Landscape Efficiency</u>
<u>NAAQS</u>	<u>National Ambient Air Quality Standards</u>
<u>NAHC</u>	<u>Native American Heritage Commission</u>
<u>NDIR</u>	<u>Non-Dispersive Infrared Photometry</u>
<u>NHPA</u>	<u>National Historic Preservation Act</u>
<u>NO</u>	<u>Nitrogen Oxide</u>
<u>NOI</u>	<u>Notice of Intent</u>
<u>NO2</u>	<u>Nitrogen Dioxide</u>
<u>Non-VHFHSZ</u>	<u>Non-Very High Fire Hazard Severity Zone</u>
<u>NOP</u>	<u>Notice of Preparation</u>
<u>NOx</u>	<u>Nitrogen Oxides</u>
<u>NPDES</u>	<u>National Pollutant Discharge Elimination Discharge System</u>
<u>NRCS</u>	<u>Natural Resource Conservation Service</u>

<u>Acronym/ Abbreviation</u>	<u>Definition</u>
<u>NRHP</u>	<u>National Register of Historic Places</u>
<u>NWIC</u>	<u>Northwest Information Center</u>
<u>N2O</u>	<u>Nitrous Oxide</u>
<u>O3</u>	<u>Ozone</u>
<u>OCP</u>	<u>Organochlorine Pesticides</u>
<u>OHP</u>	<u>Office of Historic Preservation</u>
<u>OHWM</u>	<u>Ordinary High-Water Mark</u>
<u>OPR</u>	<u>Office of Planning and Research</u>
<u>PCBs</u>	<u>Polychlorinated biphenyls</u>
<u>PCE</u>	<u>Peninsula Clean Energy</u>
<u>PDO</u>	<u>Parkland Dedication Ordinance</u>
<u>PG&E</u>	<u>Pacific Gas and Electric</u>
<u>PHMB</u>	<u>Plan Half Moon Bay</u>
<u>PM</u>	<u>Particulate Matter</u>
<u>ppb</u>	<u>parts per billion</u>
<u>ppm</u>	<u>parts per million</u>
<u>PPV</u>	<u>Peak Particle Velocity</u>
<u>project</u>	<u>Hyatt Place project</u>
<u>PUD</u>	<u>Planned Unit Development</u>
<u>RCRA</u>	<u>Resource Conservation and Recovery Act of 1976</u>
<u>RHNA</u>	<u>Regional Housing Needs Allocation</u>
<u>RPS</u>	<u>Renewables Portfolio Standard</u>
<u>RWQCB</u>	<u>Regional Water Quality Control Board</u>
<u>SAM</u>	<u>Sewer Authority Mid-Coastside Wastewater Treatment</u>
<u>SB</u>	<u>Senate Bill</u>
<u>SFAAB</u>	<u>San Francisco Area Air Basin</u>
<u>SLF</u>	<u>Sacred Lands File</u>
<u>SO2</u>	<u>Sulfur Dioxide</u>
<u>SOON</u>	<u>Surplus Off-Road Opt-In for Nox</u>
<u>SR</u>	<u>State Route</u>
<u>SRRE</u>	<u>Source Reduction and Recycling Element</u>
<u>SSMP</u>	<u>Sewer System Management Plan</u>
<u>ST</u>	<u>Short-Term</u>
<u>STC</u>	<u>Sound Transmission Class</u>
<u>SWCV</u>	<u>Solid Waste Collection Vehicles</u>
<u>SWPPP</u>	<u>Storm Water Pollution Prevention Plan</u>
<u>SWQCB</u>	<u>State Water Quality Control Board</u>
<u>SWRCB</u>	<u>State Water Resources Control Board</u>

<u>Acronym/ Abbreviation</u>	<u>Definition</u>
<u>TAC</u>	<u>Toxic Air Contaminants</u>
<u>TeNS</u>	<u>Technical Noise Supplement</u>
<u>TDM</u>	<u>Transportation Demand Management</u>
<u>TIA</u>	<u>Transportation Impact Analysis</u>
<u>TIS</u>	<u>Traffic Impact Study</u>
<u>TSCA</u>	<u>Toxic Substances Control Act</u>
<u>USACE</u>	<u>US Army Corps of Engineers</u>
<u>U.S. EPA</u>	<u>U.S. Environmental Protection Agency</u>
<u>USFWS</u>	<u>United States Fish and Wildlife Service</u>
<u>USGS</u>	<u>United States Geological Survey</u>
<u>UWMP</u>	<u>Urban Water Management Plan</u>
<u>VOCs</u>	<u>Volatile Organic Compounds</u>
<u>VMT</u>	<u>Vehicle Miles Traveled</u>
<u>vph</u>	<u>vehicle per hour</u>
<u>VRF</u>	<u>Variable Refrigerant Flow</u>
<u>v/c</u>	<u>volume-to-capacity</u>
<u>WDRs</u>	<u>Water Discharge Requirements</u>
<u>WEF</u>	<u>wildlife exclusionary fence</u>
<u>WUI</u>	<u>Wildland Urban Interface</u>

Chapter 2.0, Executive Summary

Pages 2-8 and 2-9: Staff Initiated Change – Changed to Modified Alternative 2.

Modified Alternative 2 — Reduced Density Alternative

As discussed in Chapter 5.0 Alternatives, the Reduced Intensity Alternative, Modified Alternative 2 includes a smaller hotel with fewer rooms and a residential component.

Modified Alternative 2 involves the construction of a 66,268784 square-foot, 102-room hotel on the project site, a subdivision allowing for future development of up to 16 dwelling units (~~8 duplexes~~) along Seymour Street with associated street frontage improvements, and the expansion of the car dealership parking lot. The hotel, as proposed under Modified Alternative 2, would consist of two main buildings, a north building and south building, and a parking lot that faces Main Street. A third one-story building is proposed on the east side of the north building that would house a bicycle rental shop. The north building would be a three-story structure consisting of guestrooms and employee areas and the south building would be a two-story structure consisting of the lobby and public space, ~~lobby~~, with guestrooms on the second level.

The project site for Modified Alternative 2 was expanded to include a 1.15-acre parcel north of Seymour Street along SR-1, used by the auto dealership for extra parking. Modified Alternative 2 would require a lot line adjustment on the 5.02-acre parcel, adding 0.4564 acres to the dealership and using the remaining 4.5744 acres for the hotel and Open Space. Adding 0.4564 acres to the dealership allows for future residential development of the 1.15-acre parcel on the north side of Seymour Street owned by the project applicant with ~~duplexes or other~~ housing types consistent with the underlying R-2 zoning. Upon completion of a subdivision map, Lots 1 ~~and 2~~ would be developed with a ~~minimum of up to 4 units of affordable housing~~. Lots 23 through 48 would remain in use as parking for the dealership as needed but could be developed in the future with up to 12 units, and Seymour Street would be updated with frontage improvements.

Under Modified Alternative 2, the building massing and number of guestrooms would be reduced, as compared to the project (102 guest rooms reduced from 129 guest rooms), and the project would take up less of the length of project site. The length of the buildings in the ~~reduced density alternative~~ Modified Alternative 2 would comprise approximately 50 percent of the project site.

Alternative 3 — Multi-Family Residential Alternative

As discussed in Chapter 5.0, the Multi-family Residential Alternative, Alternative 3, would involve the construction of residential units at the project site rather than a hotel.

Alternative 3 consists of 2 main buildings, a 2-story structure and a 3-story structure with 58 Multifamily Units. Alternative 3 also includes a parking lot on the east side of the project site with 116 parking spaces, 50 percent of which would be enclosed within a

garage/carport. The auto dealership would be extended south, and housing would be proposed on the north side of Seymour Street, similar to Modified Alternative 2. The layout for Alternative 3 was designed to obtain the most efficient parking and is based on the same layout as the reduced sized hotel as proposed in Modified Alternative 2, including the structure locations.

Under Alternative 3, the footprint of the primary buildings would be substantially similar to Modified Alternative 2. Parking for residential development on the main portion of the site area may require carports or garages, however, these would be located within the area assumed for surface parking. Such structures could increase floor area, but would not increase impervious surface area.

Page 2-11, Table 2-1, Summary of Impacts, and Standard Conditions of Approval, and Mitigation Measures: Staff Initiated Change – The Draft EIR erroneously cited Mitigation Measure Cumulative AG-1 in lieu of compliance with Policy 4-10. Mitigation Measure Cumulative AG-1 has been removed.

Page 2-23, Table 2-1, Summary of Impacts, and Standard Conditions of Approval, and Mitigation Measures: Staff Initiated Change – The City’s Electrification Ordinance is no longer in effect, so reliance on compliance through the standard condition of approval is no longer feasible. Both the Original Project and Modified Alternative 2 would comply with Title 24 standards through incorporating “green building” and other energy-saving measures, specifically through the LEED prerequisites, use of renewable PCE electrical power, and its building location, which is conveniently near multiple public transportation lines. The impact is now less than significant.

Table 2-1 Summary of Impacts, and Standard Conditions of Approval, and Mitigation Measures

Environmental Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
Agriculture and Forestry			
<i>There are no significant impacts to Agriculture and Forestry.</i>			
Cumulative	Significant	<p><u>Mitigation Measure Cumulative AG-1:</u> All conversions of prime and non-prime agricultural lands to a new non-agricultural use, excluding farmworker housing, agricultural compatible uses, and supplemental uses as defined in the Half Moon Bay Local Coastal Land Use Plan such as habitat restoration and recreation, shall be mitigated at a ratio to be established based on the quality of agricultural lands converted, their location, and other relevant factors as evaluated in a report prepared by a qualified professional for the City's review and approval. Methods for mitigation may include but are not limited to establishing agricultural conservation easements, soil restoration, or in lieu fees in partnership with land trust and conservation agencies. Protection or restoration of agricultural lands within city limits is preferred; followed by lands within the coastal zone of unincorporated San Mateo County and finally by other coastal zone areas.</p>	Does not significantly contribute
Energy			
Impact ENG-1: The project would result in a conflict of the local plan for renewable energy and energy efficiency.	Significant	Standard Condition ENG-1: The project will be constructed to operate on electric only energy to comply with the City's Building Electrification Ordinance.	Less than Significant

Chapter 3.0, Project Description

Section 3.2, Project Components

Circulation and Traffic

Page 3-11: Comment Response Initiated Change – The Draft EIR was updated per comment response C-81.3.

Primary vehicular access to the project site would be from a two-way curb cut along Main Street, opposite the Coastal Repertory Theater (see Error! Reference source not found.). Vehicles would enter and exit the site at this location to access the parking lot and hotel porte cochere.¹ Service access for hotel deliveries would be provided at a separate curb cut along Main Street, just south of the primary vehicle access. A truck loading zone would be provided at the main entrance in addition to another loading zone space. A bus loading zone is proposed on Main Street south of the driveway. The design and location will be subject to SamTrans review and approval.

Prior to the start of construction activities, the contractor will prepare and submit a detailed construction management plan for City approval. The construction management plan will indicate the days and times of construction, the duration of the phase of construction, where workers will park, truck haul routes, the number and type of trucks that will access the site during each phase, and other details. The City will require that adequate access for all transportation modes, especially emergency vehicles, be maintained during construction.

¹ A porte cochere is a roofed structure extending from the entrance of a building over an adjacent driveway and sheltering those getting in or out of vehicles.

Chapter 4.0, Settings, Impacts, and Mitigation Measures

4.0 Settings, Impacts, and Mitigation Measures

Page 4-6: Staff Initiated Change – Two additional cumulative resources were identified and added to Table 4.0-1, List of Cumulative Projects, after publication of the Draft EIR.

Table 4.0-1 List of Cumulative Projects

Project No.	Location	Project Description	Status	Distance from Project Site
<i>Private Development Applications</i>				
N/A	Young Avenue at State Route (SR-1)	Surf Beach/Surf Dunes CDP 212-room hotel, Conference Ctr RV Park, 10-cabin Hostel, other mixed uses	Project Application submitted and under City review	2.5 mi north
N/A	Carlos St. Moss Beach, unincorporated County	Cypress Point Affordable Housing Project 71 units (Mid Pen)	Approved, not built	7.25 mi north
N/A	51 Alhambra Ave, El Granada, unincorporated County	Harbor View Inn, 15-room Expansion	Conditionally approved by San Mateo County	4.7 mi north
N/A	1390 Main St, Montara, unincorporated County	Main Street, 3-story 22-room Hotel	Project Application submitted and under San Mateo County review	8 mi north

Project No.	Location	Project Description	Status	Distance from Project Site
N/A	Capistrano at SR-1, Princeton, unincorporated County	Harbor Village RV Park, 50-space RV and 7 tent cabins	Conditionally approved by San Mateo County	4.9 mi north
Half Moon Bay Projects				
(615)	Citywide	<p>Bicycle and Pedestrian Master Plan Implementation Program</p> <p>This project includes the implementation of the projects identified in the Bike and Pedestrian Master Plan.</p> <p>Projects anticipated in Bicycle and Pedestrian Master Plan include design and construction of major rehabilitation for two sections of the Coastal Trail within the Ocean Colony Subdivision.</p>	<p>Plan adopted September 2019</p> <p>Ongoing</p> <p>Accomplishments in 2018-2020 include the completion of the Master Plan and ongoing work with the Bicycle/Pedestrian Advisory Committee (BPAC) and successful grant application for the Naomi Patridge East Side Parallel Trail - North. Currently, the design of the project is underway.</p>	N/A
(619)	Bike Trail from Roosevelt to Mirada, east of SR-1	<p>Bikeway Connectivity Project - North</p> <p>This project includes the design, permitting, environmental clearance, and construction of a Class I multi-use path parallel to the east side of SR-1 between Roosevelt Boulevard and Mirada Road.</p> <p>The project will extend the current Class I path from the existing terminus at Roosevelt Boulevard north to the City limits. The path will be approximately 10-foot wide and will be extended for approximately 0.26 miles north.</p>	<p>Previously Approved</p> <p>The City has completed the 95 percent plans and submitted to Caltrans for permitting. The environmental clearance is in progress. The City has received approval for TDA Article 3 grant for additional construction funding. Due to the new ped/bike bridge needed for the project, Caltrans is requiring the longer PEER process. It is now expected that the project will be</p>	2.8 mi north

Project No.	Location	Project Description	Status	Distance from Project Site
			ready for construction advertising in 2022.	
(538)	SR-1 North, from Main Street at SR-1 to Spindrift Way	<p>Highway 1 Safety - North</p> <p>This project includes operational and safety improvements to SR-1 between North Main Street and Grandview Ave. It also includes lane intersection improvements for signalization and development of a multi-use trail on the east side of SR-1 from Main Street North to Spindrift Way. This project is principally funded through a grant from San Mateo County Transportation Authority and also includes development-related impact fees from the Pacific Ridge Subdivision (Ailanto).</p>	<p>Previously Approved</p> <p>This project was initiated in FY 16-17 and will carry over into FY 20-21 due to delays by Caltrans review and permitting process. Accomplishments for FY 18-19 include Caltrans PEER review complete.</p> <p>Environmental clearance has been certified. Coastal Development Permit has been issued. 100 percent design completed and submitted to Caltrans. Utility relocation/protection is being coordinated.</p>	1.9 mi north
(523)	SR-1 South, from Seymour Street to Wavecrest Road	<p>Highway 1 Safety - South</p> <p>This project will provide operational and safety improvements to SR-1 between Wavecrest Road and Seymour Street. It also includes construction of a signal at the Higgins Canyon Road, Main Street and SR-1 intersection with landscape and gateway signage, as well as controlled pedestrian/bicycle access to serve Naomi Patridge Trail and Smith Field Park.</p> <p>This project is principally funded through a grant from San Mateo County Transportation Authority.</p>	<p>Previously Approved</p> <p>Complete</p>	Adjacent west of project site

Project No.	Location	Project Description	Status	Distance from Project Site
(759)	Main Street, South of Stone Pine Road	<p>Main Street Bridge Project</p> <p>This project includes a major retrofit and rehabilitation of the Main Street Bridge. This project will bring the bridge into conformance with current ADA seismic requirements and extend the useful life an additional 75 years.</p>	<p>Previously Approved</p> <p>Project cancelled</p>	0.9 mi northeast
(617)	Railroad Avenue to Coastal Trail	<p>Poplar Beach Gateways Master Plan and Implementation</p> <p>This multi-year project will create a Master Plan for the Poplar Beach area, improve parking and access, create a phased program for erosion mitigation, bluff restoration, creation of gateway elements, and initiate work on the easterly re-alignment of the Coastal Trail between Poplar Street and Kelly Avenue.</p>	Final plan and CEQA review pending 2022	0.8 mi west
<i>Planned Future Projects</i>				
<u>N/A</u>	<u>Along Higgins Canyon Road</u>	<u>The City of Half Moon Bay plans for a pedestrian and bicycle trail to connect downtown Half Moon Bay with the Johnston House along Higgins Canyon Road</u>	<u>Project Pending</u>	<u>0.3 mi southeast</u>
<u>N/A</u>	<u>Purisima Creek Redwoods Preserve</u>	<u>Implementation of various transportation demand management strategies.</u>	<u>Project Pending</u>	<u>3.4 mi southeast</u>

4.1 Aesthetics

Page 4.1-8 and Page 4.1-10: Staff Initiated Change – The baseline photos of Viewpoints 1 through Viewpoints 4 were updated with improved photography that more accurately represent current conditions at the project site. The angle of the photo at Viewpoint 2 was shifted to better capture the project site, the intersection improvements, and the completed traffic signalization project at SR-1 and Main Street. The updated photos capture a wider field of view, which provides more context around the project site. The updated photos also depict the story poles that were erected on the project site to demonstrate size and massing of the Alternative 2, which is virtually identical to Modified Alternative 2 from a size and massing perspective.

Hyatt Place Half Moon Bay Project

Viewpoint 1



Viewpoint 2



Existing Views - Viewpoints 1 and 2

Figure

4.1-3

Source: SquareOne, 2024.

Hyatt Place Half Moon Bay Project

Viewpoint 3



Viewpoint 4



Existing Views – Viewpoints 3 and 4

Figure

4.1-4

Source: SquareOne, 2024.

Section 4.1.3, Regulatory Setting

Page 4.1-12: Staff Initiated Change – Draft EIR was updated to reference Policy 9-12, which requires that new development in proximity to or easily visible from the Town Boulevard scenic corridor (including the stretch of SR-1 adjacent to the project site) adhere to numerous LCLUP policies.

The project site borders SR-1 and would therefore be visible from this corridor. However, the project design would draw upon the existing aesthetic character of Half Moon Bay to reflect and emphasize the visual resources surrounding the project site. Though the portion of SR-1 that runs adjacent to the project site isn't officially designated as a scenic corridor, it is identified in the Local Coastal Land Use Plan (LCLUP) as part of the Town Boulevard, which is a designated visual resource area supported by numerous LCLUP policies, including policy 9-12 (Town Boulevard Scenic Corridor). Additionally, the City has expressed intent to treat the SR-1 corridor as a visual resource area (see the City of Half Moon Bay Zoning Ordinance consistency discussion below for more information). Furthermore, as described later in this section, recent Coastal Commission consideration of the fire tower project east of the project site provided guidance to the City for implementing scenic corridor requirements. Therefore, all regulations and policies regulating scenic corridors and visual resources would apply to the project site. Project design is consistent with these regulations and those under the California Scenic Highway Program.

Page 4.1-15: Staff Initiated Change – The Draft EIR erroneously referred to LCLUP Policy 7-1, where it should have referenced Policy 9-12, which requires that new development in proximity to or easily visible from the Town Boulevard scenic corridor (including the stretch of SR-1 adjacent to the project site) adhere to numerous LCLUP policies.

The project is located within 200 yards of SR-1, and is therefore subject to Section 18.37.020 and 18.37.030 of the Half Moon Bay Zoning Ordinance. As defined by 18.37.020, the stretch of SR-1 adjacent to the project site does not meet the definition of a visual resource area because it has not been designated by the State as a scenic corridor, nor is it shown on the LCLUP Scenic and Visual Resource Areas map (Figure 4.1-1). However, consistent with Coastal Commission guidance, the City's "Assessing Visual Resource Policies for Projects within 200 Yards of Highway One" Memo, LCLUP Policy ~~7-1~~ 9-12 (Table 4.1-1) clearly presents Half Moon Bay's intent to treat the SR-1 corridor as a visual resource area. Pursuant to Section 18.37.030(B)(5), new developments should address views of the inland hillsides from SR-1 to evaluate the extent to which development obstructs skyline ridgeline views.

Parking included with project design would be substantially screened from motorists on SR-1 by the building massing.

Page 4.1-17: Comment Response Initiated Change – Draft EIR updated per comment responses C-83.3 to C-83.5 regarding LCLUP policy consistency.

Table 4.1-1 Project Consistency with Relevant General Plan Policies

General Plan Policy Number	General Plan Policy	Project Consistency
<i>LCLUP Chapter 9 Scenic and Visual Resources</i>		
9-2: Scenic Resource Protection	New development shall be sited and designed to protect views to and along the ocean, to minimize the alteration of natural land form, to be visually compatible with the character of its setting, and, where feasible, to restore and enhance visual quality in visually degraded areas.	<p>Consistent/Inconsistent. The project site is flat and would not affect <u>alter</u> natural landforms, <u>nor is it within a degraded area</u>. The project does not affect views of the ocean. The building design incorporates natural colors and materials to be visually compatible with the SR-1 setting because the site is located near open fields to the south and west, and foothills can be seen to the east.</p> <p><u>Nevertheless, the project would affect views of the ridgeline and upland slopes (Viewpoints 2 and 3), which are natural landforms protected under this policy.</u></p>
9-3: Visual Quality	<p><u>Preserve and enhance the unique visual quality that contributes to Half Moon Bay's coastal and small-town character, including its open, expansive views from the coastal terrace to the beaches, bluffs, ocean, and upland slopes.</u></p>	<p>Inconsistent. <u>The project development is clustered and set back from SR-1 and the intersection of SR-1 at South Main Street to allow for site lines across the substantially undeveloped portion of the site. The project mass is broken up into multiple structures and building design and materials were selected to be visually compatible with agricultural building forms, colors and rough textures. Landscape elements align the two sides of the project to the context of each side of the site. On the west side of the site, landscaping includes wetland restoration and use of native plantings found in nearby Wavecrest; on the east side of the site, landscaping includes street trees and frontage improvements consistent with Main Street. Given the above, the project would be consistent with the aspects of Policy 9-3 intended to preserve and enhance visual quality that contributes to Half Moon Bay's coastal and small-town character. However, views of the ridgelines and upland slopes are impacted as viewed from northbound SR-1 approaching the project site</u></p>

General Plan Policy Number	General Plan Policy	Project Consistency
9-12: Town Boulevard Scenic Corridor	<p>Require that new development in close proximity to or easily visible from the Town Boulevard scenic corridor, including Highways 1 and 92:</p> <p>a. Protects views of visual resource areas as seen from the Town Boulevard, including views to the ocean, upland slopes (i.e. minimizes intrusions into the ridgeline), and the historic Johnston House;</p> <p>b. Incorporates design standards such as screening of commercial parking areas and landscaping provisions; and</p> <p>c. Is visually compatible with the surrounding land and development.</p> <p>Update the IP with additional standards for new development along the Town Boulevard based on additional study of the scenic corridor. Assessment should, at a minimum, consider views of visual resource areas from the perspective of existing and potential development along the Town Boulevard and identify scenic segments along Highway 1 and 92, including views of the ridgelines and other visual resource areas. Development standards should address, at a minimum, appropriate building heights and setbacks, longest wall lines, minimum space between buildings, and streetscape design.</p>	<p>from the south. As such, the project would be inconsistent with Policy 9-3.</p> <p>Inconsistent. The project site design incorporates deep setbacks from SR-1 to minimize visual intrusions into the ridgeline from the SR-1 view.</p> <p>The project would be subject to design review. The project development is clustered and set back from SR-1 and the intersection of SR-1 at South Main Street to allow for site lines across the substantially undeveloped portion of the site. The project mass is broken up into multiple structures and building design and materials were selected to be visually compatible with agricultural building forms, colors and rough textures. Landscape elements align the two sides of the project to the context of each side of the site. On the west side of the site, landscaping includes wetland restoration and use of native plantings found in nearby Wavecrest; on the east side of the site, landscaping includes street trees and frontage improvements consistent with Main Street.</p> <p>Despite these design considerations, views of the ridgelines are impacted as viewed from northbound SR-1 approaching the project site from the south. Therefore, the project would be inconsistent with Policy 9-12.</p>

Section 4.1.4, Impacts and Mitigation Measures

Impact AES-1

Page 4.1-22: Comment Response Initiated Change – The Draft EIR was updated per comment response C-83.56.

Buildout of the project ~~also has the potential to~~ would impact the long-range views of hillsides and ridgelines to the north and east of the project site (Viewpoints 2, 3 and 4). Views of the hillside from SR-1 and from the Naomi Patridge Trail would be partially ~~have the potential to be~~ obscured by the project.

Impact AES-3

Page 4.1-31: Comment Response Initiated Change – The Draft EIR was updated due to comment responses expressing concern for aesthetic impacts to the Downtown character. See Topical Response 2: Aesthetics which discusses impacts to Downtown Half Moon Bay.

The project was designed to be visually compatible with the nature and character of Downtown Half Moon Bay. ~~Changes to the project site would be consistent with the developed nature of Downtown.~~ ~~However~~ although the buildings are significantly larger and present longer facades than existing development patterns throughout Downtown and in the immediate neighborhood. To address this, the project would incorporate high quality design elements, landscaping, and screening techniques. However, the visual quality of the project site as seen from public viewpoints is conservatively considered to be adversely affected by the project. The findings above are based on special circumstances related to both the site, including its location, shape, visibility, and gateway location; and the proposed development, including its relatively long facades and larger building forms than typically found in the city.

4.2 Agricultural Resources

Section 4.2.5, Cumulative Impacts

Page 4.2-13: Staff Initiated Change – The Draft EIR erroneously cited Mitigation Measure Cumulative AG-1 in lieu of compliance with Policy 4-10. Mitigation Measure Cumulative AG-1 has been removed.

As discussed above, a LESA evaluation was prepared for the project. Based on the LESA evaluation, there are other active agricultural uses that are located within the City limits outside the urbanized Downtown area that continue to be more appropriate for agricultural uses; the project applicant will mitigate for lost prime soils to support San Mateo County coastal agriculture; and the intended development of the project site is noted in the LCLUP.

Additionally, the City has adopted Policy 4-10 consistent with CCA policies for prioritizing preservation of agricultural uses in the City and regionally. Consistent with Policy 4-10, the project applicant will implement **Mitigation Measure Cumulative AG-1** for the loss of the limited area of prime soils by supporting the San Mateo Resource Conservation District or other City approved means of providing agricultural land protections or soils restoration.

~~**Mitigation Measure Cumulative AG-1:** All conversions of prime and non-prime agricultural lands to a new non-agricultural use, excluding farmworker housing, agricultural compatible uses, and supplemental uses as defined in the Half Moon Bay Local Coastal Land Use Plan such as habitat restoration and recreation, shall be mitigated at a ratio to be established based on the quality of agricultural lands converted, their location, and other relevant factors as evaluated in a report prepared by a qualified professional for the City's review and approval. Methods for mitigation may include but are not limited to establishing agricultural conservation easements, soil restoration, or in lieu fees in partnership with land trust and conservation agencies. Protection or restoration of agricultural lands within city limits is preferred; followed by lands within the coastal zone of unincorporated San Mateo County and finally by other coastal zone areas.~~

Therefore, the loss of 3.05 acres of prime agricultural soils is not a considerable contribution to a significant cumulative impact to loss of agricultural uses and prime soils for the City and San Mateo County coastal agricultural operations.

4.7 Energy

4.7.4 Impacts and Mitigation Measures

Page 4.7-9: Staff Initiated Change – Applicable law on this topic has evolved and, at this time, the City's Building Electrification Ordinance is no longer in effect.

~~Building Electrification Ordinance Adopted in early 2022, Half Moon Bay's Title 14 of the Half Moon Bay Municipal Code Building Electrification Ordinance will assist the State in reaching Senate Bill 32 goals. The Building Electrification Ordinance requires all new building constructions to be electric-only, with no gas or propane used in the new construction. Additionally, the Building Electrification Ordinance would require electric retrofits for various types of remodels, and require fuel gas lines to be capped/decommissioned in existing buildings by 2045.~~

Page 4.7-12: Staff Initiated Change – Applicable law on this topic has evolved and, at this time, the City's Building Electrification Ordinance is no longer in effect. Therefore, this footnote and related text was removed.

water and air in the building(s)², and electricity usage associated with the project. In addition, there would be indirect electricity usage associated with the conveyance of water supplies to the project and wastewater produced by the project.

Pages 4.7-13 – 4.7-14: Staff Initiated Change – Applicable law on this topic has evolved and, at this time, the City’s Building Electrification Ordinance is no longer in effect. Therefore, this footnote and related text was removed.

Energy b) Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Impact ENG-1. The project would not result in a conflict of the local plan for renewable energy and energy efficiency.

Less than Significant with Standard Condition. As discussed in **Section 4.7.3, Regulatory Setting**, implementation of the project would comply with all state regulations as required. The project design would comply with Title 24 standards through incorporating “green building” and other energy-saving measures, specifically through the LEED prerequisites, use of renewable PCE electrical power, and its building location, which is conveniently near multiple public transportation lines.

~~As stated above, all new buildings in the city are required to operate on electric only energy, without the use of natural gas. While this analysis assumes the use of natural gas, the project is expected to be in compliance with the City ordinance. This is, in part, due to the project applicant’s adherence to Standard Condition ENG-1. Therefore, with adherence to Standard Condition ENG-1, the project would be constructed to operate on electric only energy, and would be in compliance with the City ordinance.~~

~~**Standard Condition ENG-1: City Electrification Ordinance.** The project will be constructed to operate on electric only energy to comply with the City’s Building Electrification Ordinance.~~

~~Therefore, b-By complying with state and local energy policies, implementation of the project would result in a less than significant impact to State and local energy policies and plans.~~

²~~During preparation of the draft EIR, the City adopted a Building Electrification ordinance, which requires all new buildings to operate on electric only energy, without the use of natural gas. While this analysis assumes the use of natural gas, the project is expected to be in compliance with the City ordinance. As such, this EIR overestimates consumption of energy resources, which are anticipated to be lower with compliance to the City’s Building Electrification ordinance.~~

4.11 Land Use and Planning

Section 4.11.3, Regulatory Setting

Pages 4.11-7 – 4.11-9: Comment Response Initiated Change – The Draft EIR was updated due to comment responses expressing concern for impacts to open space. See Topical Response 2: Aesthetics which discusses impacts to open space.

City of Half Moon Bay Local Coastal Program & Land Use Plan (2021)

Half Moon Bay's LCP consists of the LCLUP and the City's Zoning Ordinance (often referred to as the Local Coastal Implementation Plan). The LCLUP, which is the policy component of the LCP, contains policies for land uses.

Relevant General Plan policies are listed below in Error! Reference source not found.. Because the project site has a Commercial-General land use designation, the project would be subject to policies applicable to areas considered in the comprehensive development of Half Moon Bay.

Open space comprises 17 percent of land use in the City, and serves an important functions for recreation, resource production, and hazard avoidance. The City defines open space pursuant to Public Resources Code Section 65560, as any land, parcel, or area of land or water that is essentially unimproved and devoted to an open-space use as defined in this section, and that is designated on a local, regional, or state open-space plan as any of the following:

- (1) Open space for the preservation of natural resources, including, but not limited to, areas required for the preservation of plant and animal life, including habitat for fish and wildlife species; areas required for ecologic and other scientific study purposes; rivers, streams, bays, and estuaries; and coastal beaches, lakeshores, banks of rivers and streams, and watershed lands.
- (2) Open space used for the managed production of resources, including, but not limited to, forest lands, rangeland, agricultural lands, and areas of economic importance for the production of food or fiber; areas required for recharge of groundwater basins; bays, estuaries, marshes, rivers, and streams that are important for the management of commercial fisheries; and areas containing major mineral deposits, including those in short supply.
- (3) Open space for outdoor recreation, including, but not limited to, areas of outstanding scenic, historic, and cultural value; areas particularly suited for park and recreation purposes, including access to lakeshores, beaches, and rivers and streams; and areas that serve as links between major recreation and open-space reservations, including utility easements, banks of rivers and streams, trails, and scenic highway corridors.

- (4) Open space for public health and safety, including, but not limited to, areas that require special management or regulation because of hazardous or special conditions such as earthquake fault zones, unstable soil areas, flood plains, watersheds, areas presenting high fire risks, areas required for the protection of water quality and water reservoirs, and areas required for the protection and enhancement of air quality.
- (5) Open space in support of the mission of military installations that comprises areas adjacent to military installations, military training routes, and underlying restricted airspace that can provide additional buffer zones to military activities and complement the resource values of the military lands.
- (6) Open space for the protection of places, features, and objects described in Sections 5097.9 and 5097.993 of the Public Resources Code.

The LCLUP further defines open space into several categories, outlined below. The use of “open space” in the Draft EIR is most congruent with the LCLUP’s definition of “Open Space, Public”, as the open space proposed as part of the project would be accessible to members of the public and would preserve the wetlands along SR-1.

Additional definitions of open space from the LCLUP include the following:

- Open Space, Common: Open spaces areas for common use including but not limited to recreational areas and facilities for the use of prospective residents of a development, such as tennis courts, golf courses, swimming pools, playgrounds, or community gardens. Common open space does not include driveways, parking lots, private patios and yards, or other developed areas.
- Open Space, Private: Open space areas for the private use of residents of individual units, including but not limited to patios, decks, yards, and land permanently dedicated to open field agricultural use.
- Open Space, Public: Open space areas accessible to members of the general public, including but not limited to neighborhood and other public parks and accessory parking lots, beaches, bike paths, hiking or equestrian trails, and vista points. Environmentally sensitive habitat areas, green infrastructure for stormwater management, and archaeological sites may be included in public open space only if such areas are contiguous with or otherwise contribute to the open space area usable by the public for passive recreation, including walking, wildlife viewing. Public open space does not include areas which are unusable for recreational

purposes, such as private or public streets, private parking lots, and hazardous areas such as steep slopes and bluff faces.

City of Half Moon Bay Zoning Code

The Half Moon Bay Zoning Code comprises most of the LCLUP's Implementation Plan (IP). Chapter 18.15 of the Zoning Code describes the intent and requirements for the PUD zoning designation. This designation is intended to provide for a variety of land uses, such as attached and detached single-family residential development, multiple-family housing development, professional and administrative areas, commercial and industrial uses, institutional uses, and public and private open space and recreation opportunities through the adoption of a comprehensive development plan as set forth in the City General plan and this chapter. The intent of establishing the PUD district is to:

- A. Implement the plans and policies of the adopted city land use plan, or General plan, and the land use plan map
- B. Establish regulations and procedures for the preparation, review, and approval of planned unit development plans to guide the orderly development of land within this district
- C. Establish a procedure for the administration of specific plans and precise plans, prepared in accordance with the state Government Code and consistent with the Half Moon Bay Land Use Plan
- D. Provide for the classification and development of parcels of land as coordinated, comprehensive projects so as to take advantage of the superior environment that can result from requiring that an entire area be planned as a unit and developed under a single plan
- E. Encourage the assembly of properties that might otherwise be developed in unrelated increments to the detriment of surrounding properties, neighborhoods, and the City
- F. Avoid piecemeal development and provide for the replatting of old subdivisions for development under a comprehensive planning document
- G. Avoid monotony by allowing greater flexibility in the design and development of land within this district
- H. To ensure that a minimum of twenty percent of the site area in any planned unit development is provided in public and/or private open space
- I. Encourage variety and diversification of land uses
- J. Provide flexibility required for achievement of coastal access goals, protection of coastal resources, provision of open space

and recreation areas, and avoidance of siting structures in hazardous areas. (1996 zoning code (part)).

In order to develop a PUD site, the property owner/project applicant must plan the site as a whole according to the LCLUP policy and performance standards. The City will consider the range of permitted uses, development standards, performance criteria, and phasing of development to provide adequate public services and infrastructure. The LCP and the General Plan provide guidance for development of the PUD areas. This case is especially unique in that the LCLUP removed this site from the Planned Development land use designation, and it now has a Commercial – General land use designation. The LCLUP further specifies that implementation zoning will include rezoning the site from the PUD zoning district to the CG zoning district. Thus, the CG zoning code served as guidance for establishing development standards applicable for the PUD zoning.

The Half Moon Bay Zoning Code, Chapter 18.02 Definitions, provides the following definitions for open space:

- Open Space, Common. “Common open space” means an open space within a residential development that is reserved for the exclusive use of residents of the development and their guests.
- Open Space, Private. “Private open space” means a usable open space adjoining and directly accessible to a dwelling unit, reserved for the exclusive use of residents of the dwelling unit and their guests.
- Open Space, Public. “Public open space” means that portion of a development site that has been dedicated to or otherwise set aside for public access, use or benefit.
- Open Space, Total. “Total open space” means the sum of private and public open space.
- Open Space, Usable. “Usable open space” means outdoor or unenclosed area on the ground, or on a balcony, deck, porch or terrace designed and accessible for outdoor living, recreation, pedestrian access or landscaping, but excluding parking facilities, driveways, utility or service areas, or any required front or corner side yard, and excluding any space with a dimension of less than six feet in any horizontal direction or an area of less than forty-eight square feet.

4.12 Noise and Vibration

Section 4.11.5, Impacts and Mitigation Measures

Pages 4.12-16: Staff Initiated Change – Draft EIR updated to correctly reflect the direction of the sound barriers

Mitigation Measure NOI-1a: Construction Best Management Practices

Prior to issuance of a grading permit, the applicant shall develop a construction noise control plan meeting the approval of the City Manager or his/her designee and/or third-party peer review, including, but not limited to, the performance standards listed below. The applicant shall employ an acoustical consultant pre-approved by the City Manager or designee, to ensure the efficacy of the noise control plan. The acoustical consultant shall conduct onsite checks during construction to ensure that nuisance noise is being reduced in accordance with the noise control plan. Monthly reports shall be submitted to City Manager's office for the duration of construction or until such time that the City Manager or designee deems it no longer necessary.

- Installation of temporary sound barriers/blankets along the northern and ~~western~~eastern project boundary line adjacent to the single-family receivers. The temporary barriers/blankets shall have a minimum 5 dBA reduction. The temporary barriers/blankets will be of sufficient height to extend from the top of the temporary construction fence and drape on the ground or be sealed at the ground. The temporary barriers/blankets will have grommets along the top edge with exterior grade hooks, and loop fasteners along the vertical edges with overlapping seams, with a minimum overlap of 2 inches.

4.13 Population and Housing

Section 4.13.3, Regulatory Setting

Pages 4.13-7 – 4.13-8: Comment Response Initiated Change – The Draft EIR was updated per comment response C-81.7 which discusses the City's Housing Element.

Project Consistency

As discussed in Section 4.12.2, Existing Conditions, ABAG prepared the RHNA for the cycle 5 Housing Element for the 2015-2023 period. Table 4.13-2 identifies the need for a total of 240 units for varying income groups by 2023. The Half Moon Bay Housing Element estimates that the 671 Measure D growth allocations that will be available during the 2014 through 2022 timeframe are more than sufficient to accommodate the RHNA. ~~Currently, Half Moon Bay is working on the Cycle 6 housing element which would include a higher RHNA.~~ The City has completed its first draft cycle 6 Housing

~~Element for the 2023-2031 period and submitted it to the California Department of Housing and Community Development (HCD) for review. The cycle 6 Housing Element must identify adequate sites for a RHNA of 480 units distributed amongst various income categories. Although implementation of the project would not contribute to housing needed to meet RHNA for Half Moon Bay, it would not use any land intended for residential allocations as described in the Housing Element. The 1.15-acre site on the north side of Seymour Street is identified as a pipeline project in the draft cycle 6 Housing Element because it is part of an active application. Therefore, implementation of the project would not interfere with the allocation of units anticipated to meet and exceed the RHNA. For this reason, The residential portion of Alternative 2 the project would be consistent with the ABAG Regional Housing Needs Determination.~~

4.15 Transportation and Traffic

Section 4.15

Pages 4.15-29: Staff Initiated Change – The Draft EIR has been updated to describe in greater detail the TDM requirements for the project.

It is important to continually monitor the performance of a TDM program and adjust measures as necessary to ensure its success. The hotel would conduct mode split and VMT surveys each year to both make adjustments to encourage employee participation in the TDM program suite. Guest and employee satisfaction surveys are also an effective way of ensuring a quality TDM program. The following mitigation measure will ensure the ongoing monitoring of the TDM measures and allow for adjustment and improvement as the measures are implemented. For the full text of the TDM measures, please reference **Appendix H, Traffic Impact Study**.

Mitigation Measure TRA-1: TDM Program and Monitoring

a. The applicant shall draft and implement a TDM Program with measures that would achieve an annual average VMT reduction of at least 15 percent. The hotel operator shall propose a TDM program that contains specific measures to achieve a 15 percent VMT reduction, which is necessary for compliance with the TDM Program. The TDM Program shall be updated from time to time, as deemed appropriate by the City, to reflect best practices in the field of Transportation Demand Management.

b. As part of the hotel operations, the hotel operator shall conduct mode split and VMT surveys each year to both make adjustments and use as marketing material. Guest and employee satisfaction surveys are also an effective way of ensuring a quality TDM program. The designated hotel Transportation Coordinator shall provide a copy of the updated TDM

program to the City Manager and Traffic Engineer annually on the date of issuance of the use and occupancy/operating permit.

c. When preparing, adopting, or updating the TDM Program, the hotel operator shall implement the TDM plan with a single occupancy vehicle (SOV) mode-share reduction commitment of 15 percent.

Significance after Mitigation. As concluded from the Traffic Impact Study (**Appendix H**), implementation of **Mitigation Measure TRA-1**, VMT levels would shall demonstrate a reduction of ~~be reduced~~ by 15.4 percent through adherence to the TDM suite. Therefore, implementation of the project would result in less than significant impacts.

Chapter 5.0, Alternatives

Due to the extent of text revisions needed in Chapter 5 to describe revisions to Alternative 2 that result in Modified Alternative 2, the entirety of Chapter 5, Alternatives, from the Draft EIR is shown in Appendix 3.0-A to this Final EIR.

MITIGATION MONITORING AND REPORTING PROGRAM

Half Moon Bay Hyatt Place Project File No. PDP 072-13

August 2024



This Mitigation, Monitoring and Reporting Program (MMRP) has been prepared pursuant to the CEQA Guidelines, which state:

“In order to ensure that the mitigation measures and project revisions identified in the EIR or negative declaration are implemented, the public agency shall adopt a program for monitoring or reporting on the revisions which it has required in the project and the measures it has imposed to mitigate or avoid significant environmental effects.” (§15097(a))

The table beginning on the next page list the impacts, mitigation measures, and timing of the mitigation measure (when the measure will be implemented) related to the Half Moon Bay Hyatt Place Project (project). The table also lists those Standard Conditions of Approval that were identified in the EIR and that apply to the project. All of the mitigation measures listed here will be implemented by the City, the Applicant, or by their appointees, as shown in the MMRP. According to CEQA Guidelines section 15126.4(a)(2), “Mitigation measures must be fully enforceable through permit conditions, agreements, or other legally-binding instruments. ” Therefore, all mitigation measures as listed in this MMRP will be adopted by the City of Half Moon Bay Planning Commission when the project is approved.

This document does not discuss those subjects for which the Environmental Impact Report concluded that the impacts from implementation of the project would be less than significant or those impacts that have been identified as significant and unavoidable.

MITIGATION MONITORING AND REPORTING PROGRAM				
Impact	Mitigation Measure	Implementation and Timing	Implementation & Monitoring Responsibility	Verified Implementation
AESTHETICS RESOURCES				
Impact AES-4: The project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.				
Less than Significant with Standard Condition of Approval and Mitigation	<p>Mitigation Measure AES-2: A lighting plan for any proposed exterior lighting must be submitted to the City of Half Moon Bay for review and approval.</p> <p>Exterior lighting must be directed downward and away from adjacent properties and public/private right-of-way to prevent glare or excessive light spillover. Lighting bulbs must be limited to low intensity lights, including lighting for identification purposes. Landscaping lights must be limited to ground-level for walking/safety purposes.</p>	Verified at issuance of building permits and prior to occupancy	<p>Implementation: Project Applicant</p> <p>Monitoring: Community Development Department</p>	<p>Initials: _____</p> <p>Date: _____</p>
AIR QUALITY RESOURCES				
Impact AQ-1. The project would result in a cumulatively considerable net increase of criteria pollutants.				
Impact AQ-2. The project would expose sensitive receptors to substantial pollutant concentrations.				
Less than Significant with Mitigation	<p>Mitigation Measure AQ-2: Selection of equipment during construction to minimize emissions. Such equipment selection would include the following:</p> <p>The project shall develop a plan demonstrating that the off-road equipment used on-site to construct the project would achieve a fleetwide average 80-percent reduction in DPM exhaust emissions or greater.</p> <p>One feasible plan to achieve this reduction would include the following:</p> <ol style="list-style-type: none"> 1. All diesel-powered off-road equipment, larger than 25 horsepower, operating on the site for more than two days continuously shall, at a minimum, meet U.S. EPA particulate matter emissions standards for Tier 3 engines and this equipment shall include CARB-certified Level 3 Diesel Particulate Filters⁷ or equivalent. Equipment that meets U.S. EPA Tier 4 interim standards or use of equipment that is electrically powered or uses non-diesel fuels would also meet this requirement. 2. Per the construction sheet provided by the applicant, line power shall be used to electrify generators used during construction. 	Include equipment plan on grading and building permit submittals. Implementation ongoing through construction.	<p>Implementation: Project Applicant and/or Contractor to prepare permit submittals.</p> <p>Monitoring: Community Development Department to verify compliance at permit issuance. Qualified City Staff/Approved Monitor</p>	<p>Initials: _____</p> <p>Date: _____</p>

MITIGATION MONITORING AND REPORTING PROGRAM				
Impact	Mitigation Measure	Implementation and Timing	Implementation & Monitoring Responsibility	Verified Implementation
BIOLOGICAL RESOURCES				
Impact BIO-1: Construction of the project would adversely impact species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife and or U.S. Fish and Wildlife Service.				
Less than Significant with Mitigation	<p>Mitigation Measure BIO-1a. Preconstruction Survey</p> <p>A qualified biologist shall conduct a preconstruction survey of the work area within 48 hours of the initiation of project activities. If a California red-legged frog of any life stage or San Francisco garter snake is found, the animal shall not be handled and will instead be allowed to leave the site on its own. If needed, the USFWS (and CDFW, if a San Francisco garter snake is found) will be contacted to request permission to relocate the individual or additional guidance on the disposition of the individual. The results of the pre-construction survey shall be provided to the City Manager or his/her designee one day prior to the commencement of construction activities.</p>	<p>Survey within 48 hours of issuance of first permit for site disturbance</p> <p>Monitoring ongoing throughout construction</p>	<p>Implementation: Project Applicant, Contractor, Qualified Biologist,</p> <p>Monitoring: Community Development Department</p>	<p>Initials: _____ Date: _____</p>
	<p>In addition, the biologist shall review plans and installation for a wildlife exclusionary fence (WEF) and make any recommendations for improvements and/or changes to location and installation processes. Following the completion of the installation of the WEF, the biologist will train a dedicated member of the construction crew in the identification of the California red-legged frog and San Francisco garter snake, as well as appropriate protocols to follow if either of these species (or animals that may be one of these species) are detected on the site. This dedicated crew member will be responsible for checking the work area for these species prior to the start of construction each day, for inspecting any steep-walled holes or trenches for any animals that may inadvertently become trapped and/or injured, and for inspecting the integrity of the WEF each day and ensuring that any needed repairs are completed within 24 hours. The construction manager shall provide a weekly summary of each inspection to the City Manager or his/her designee for the duration of the exterior construction phase.</p>			

MITIGATION MONITORING AND REPORTING PROGRAM				
Impact	Mitigation Measure	Implementation and Timing	Implementation & Monitoring Responsibility	Verified Implementation
Less than Significant with Mitigation	<p>Mitigation Measure BIO-1b. Worker Environmental Awareness Program</p> <p>Before any construction activities begin, a qualified biologist shall conduct a training session for all construction personnel. At a minimum, the training shall include a description of the California red-legged frog and San Francisco garter snake and their habitats, the importance of these species, the general measures that are being implemented to conserve these species as they relate to the project, and the boundaries within which the project may be accomplished.</p>	Prior to commencement of construction	<p>Implementation: Project Applicant, Contractor, Qualified Biologist</p> <p>Monitoring: Community Development Department</p>	<p>Initials: _____ Date: _____</p>
Less than Significant with Mitigation	<p>Mitigation Measure BIO-1c: Exclusion Barrier</p> <p>A WEF shall be installed prior to the initiation of construction activities to exclude California red-legged frogs and San Francisco garter snakes from the construction area. Prior to the WEF installation a wildlife biologist shall inspect the site and WEF specifications and make final adjustments to the location of the WEF and how it is installed. The WEF shall consist of silt fencing, plywood, ERTEC fencing, or suitable material at least 36 inches in height that is buried 6 inches deep in the ground, or similar method, to prevent access under the fencing. The location and fence type shall be indicated on plans and subject to review and approval of City Plan Check.</p>	WEF to be shown on grading plans and WEF to be installed prior to issuance of grading permit	<p>Implementation: Project Applicant Contractor, Qualified Biologist,</p> <p>Monitoring: Community Development Department</p>	<p>Initials: _____ Date: _____</p>
Less than Significant with Mitigation	<p>Mitigation Measure BIO-1d. Biological Monitoring</p> <p>A qualified biologist shall remain on-site to monitor the installation of the WEF to ensure that no San Francisco garter snakes or California red-legged frogs are trapped within the construction area or harmed during installation. If an individual of these species is detected, any project activities that could result in harm to the individual shall cease until the individual has moved out of the project site on its own. The USFWS shall be contacted immediately if a California red-legged frog or San Francisco garter snake is found, and the CDFW shall be contacted immediately if a San Francisco garter snake is found. If any individuals are killed or injured during project activities, the</p>	Ongoing throughout construction	<p>Implementation: Project Applicant, Contractor, Qualified Biologist,</p> <p>Monitoring: Community Development Department</p>	<p>Initials: _____ Date: _____</p>

MITIGATION MONITORING AND REPORTING PROGRAM				
Impact	Mitigation Measure	Implementation and Timing	Implementation & Monitoring Responsibility	Verified Implementation
	USFWS and/or CDFW, as appropriate, shall be notified within 24 hours. Proof of notification shall be provided by the contractor to the City Manager or his/her designee.			
Less than Significant with Mitigation	<p>Mitigation Measure BIO-1e. Prevention of Entrapment</p> <p>To prevent the inadvertent entrapment of San Francisco garter snakes and California red-legged frogs, all excavated, steep-walled holes or trenches shall be completely covered at the end of each work day with plywood or similar materials. If this is not possible, one or more escape ramps constructed of earth fill or wooden planks will be placed in the excavation. Before such holes or trenches are filled, they shall be thoroughly inspected for any animals by the on-site biological monitor. If at any time a California red-legged frog or San Francisco garter snake is found trapped or injured in one of these holes, any project activities that could result in harm to the individual shall cease until the individual has moved out of the project site on its own (a ramp allowing the individual to leave may need to be provided).</p>	Ongoing throughout construction	<p>Implementation: Project Applicant, Contractor, Qualified Biologist,</p> <p>Monitoring: Community Development Department</p>	<p>Initials: _____ Date: _____</p>
Less than Significant with Mitigation	<p>Mitigation Measure BIO-1f. Pre-Construction Bird Nesting Survey</p> <p>If construction-related site disturbance commences between February 1 and August 15, a qualified biologist shall conduct a pre-construction bird nesting survey within 7 days of the start of construction activities and within 300 feet of the site. If nests of either migratory birds or birds of prey are detected on or adjacent to the site, a no-disturbance buffer shall be established in consultation with the CDFW. The size of the no disturbance buffer shall be determined by a qualified biologist, and shall take into account local site features and existing sources of potential disturbance. If more than 7 days elapse between the survey and the start of construction, the survey shall be repeated. If vegetation removal, building demolition, or earthwork stages are phased over multiple years, the pre-construction survey and nest-avoidance measures described above would need to be repeated. The results of the nest survey shall be provided to the</p>	<p>Survey within 7 days of issuance of first permit for site disturbance</p> <p>If required, no disturbance buffer shall be maintained throughout construction</p>	<p>Implementation: Project Applicant, Contractor, Qualified Biologist,</p> <p>Monitoring: Community Development Department</p>	<p>Initials: _____ Date: _____</p>

MITIGATION MONITORING AND REPORTING PROGRAM				
Impact	Mitigation Measure	Implementation and Timing	Implementation & Monitoring Responsibility	Verified Implementation
	<p>City Manager or his/her designee prior to the commencement of construction.</p>			
Less than Significant with Mitigation	<p>Mitigation Measure BIO-1g. Special-Status Species Agency Coordination</p> <p>Proposed project construction activities shall not result in impacts to project site wetlands and/or habitat for special-status species known to occur in the vicinity of the site.</p> <p>Prior to commencement of construction activities, the project applicant's biologist shall obtain a verified wetland delineation and obtain concurrence with the regulatory agencies regarding special-status species. The project applicant shall continue to coordinate all project activities potentially regulated by State, Federal, and local agencies and shall obtain all necessary permits from CDFG, USACE, USFWS, and the RWQCB as required by federal and State law to avoid, minimize or offset impacts to any species listed under either the State or federal Endangered Species Acts or protected under any other State or federal law.</p> <p>Evidence that the project applicant has secured any required authorization from these agencies shall be submitted to Half Moon Bay prior to issuance of any grading or building permits for the project.</p>	<p>Wetland delineation and agency concurrence submitted prior to issuance of grading permit</p>	<p>Implementation: Project Applicant, Contractor, Qualified Biologist,</p> <p>Monitoring: Community Development Department</p>	<p>Initials: _____ Date: _____</p>
<p>Impact BIO-2: Implementation of the project would have a substantial adverse effect on riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service, and Impact BIO-3: Implementation of the project would have a substantial adverse effect on state or federally protected wetlands through direct removal, filling, hydrological interruption, or other means.</p>				
Less than Significant with Mitigation	<p>Mitigation Measure BIO-2a. Avoid All Wetlands to The Extent Feasible.</p> <p>All jurisdictional wetlands and ESHAs claimed by the CCC shall be avoided to the extent feasible. This includes direct loss and indirect water quality impacts that could occur due to adjacent development.</p>	<p>BMPs to be shown on grading and building plan submittals.</p> <p>BMPs to be implemented on an ongoing basis</p>	<p>Implementation: Project Applicant, Contractor, Qualified Biologist,</p> <p>Monitoring: Community</p>	<p>Initials: _____ Date: _____</p>

MITIGATION MONITORING AND REPORTING PROGRAM				
Impact	Mitigation Measure	Implementation and Timing	Implementation & Monitoring Responsibility	Verified Implementation
	<p>During construction, suitable erosion control, sediment control, source control, treatment control, material management, and stormwater management measures would be used in conformance with the NPDES Statewide Construction General Permit (Order No. 2009-0009-DWQ). Additionally, the project shall be designed to comply with the <i>California Regional Water Quality Control Board, San Francisco Bay Region, Municipal Regional Stormwater NPDES Permit</i> (MRP) (Water Board Order No. R2-2009-0074). This will require that the project implement BMPs into the design that prevents stormwater runoff pollution, promotes infiltration, and holds/slows down the volume of water coming from a site. In order to meet these permit and policy requirements, projects must incorporate the use of tree planters, grassy swales, bioretention and/or detention basins, among other factors. The project is already largely designed to preserve existing drainage characteristics, as seen by the placement of stormwater treatment basins near the area of the site where the seasonal wetlands occur. These basins shall be designed to drain to the avoided wetland area to preserve hydrological inputs from the site. An explanation of compliance with this measure (including drainage design and maintenance program) shall be provided to the City Manager or his/her designee and included in the project file. Compliance checking by the City shall be incorporated into the Wetland Restoration and Monitoring Plan specified in Mitigation Measure BIO-2b.</p>	<p>throughout construction</p>	<p>Development Department</p>	
<p>Less than Significant with Mitigation</p>	<p>Mitigation Measure BIO-2b. Compensate for Lost Wetlands by Restoring Avoided Wetlands.</p> <p>Most components of the project will be 100 feet away from identified jurisdictional wetland areas (as determined by site verification). Portions of the project that will be located within the buffer include the class 1 multi-use bicycle and pedestrian trail, a pedestrian path, wetlands restoration, green infrastructure, and emergency fire stands. Activities associated with these features are potentially allowed within buffers without mitigation (e.g., some trails and restoration); however, maintenance and the unlikely event of firefighting would need to be considered for</p>	<p>Wetland Restoration and Monitoring Plan to be submitted prior to issuance of grading permit</p>	<p>Implementation: Project Applicant, Contractor, Qualified Restoration Ecologist</p> <p>Monitoring: Community Development Department</p>	<p>Initials: _____ Date: _____</p>

MITIGATION MONITORING AND REPORTING PROGRAM				
Impact	Mitigation Measure	Implementation and Timing	Implementation & Monitoring Responsibility	Verified Implementation
	<p>mitigation. For development and uses such as these, which cannot be avoided by the project, the project shall restore avoided wetlands on-site at 4:1 by implementing a weed removal program in the avoided wetlands, which are dominated by weedy, non-native species such as pennyroyal (<i>Mentha pulegium</i>). It should be noted that the wetlands identified on this site were not found to be Environmentally Sensitive Habitat Areas (ESHAs). In addition to the required Section 404 permit (Nationwide), a qualified restoration ecologist will develop a Wetland Restoration and Monitoring Plan, which will contain the following components (or as otherwise modified by regulatory agency permitting conditions):</p> <ol style="list-style-type: none"> 1. Goal of the restoration (to increase wetland habitat functions and values by removing invasive species); 2. Restoration design: <ul style="list-style-type: none"> • Weed removal, control, and monitoring plan • Soil amendments and other site preparation elements as appropriate • Planting plan (to replace non-natives with native wetland species) • Maintenance plan • Remedial measures/adaptive management 3. Monitoring plan, including final and performance criteria, monitoring methods, data analysis, reporting requirements, monitoring schedule, etc.); at a minimum, success criteria will include restoration of native wetland vegetation and no more than 5 percent cover of non-native species, and provision of ecological functions and values equal to or exceeding those in the habitat that was impacted; and 4. Contingency plan for mitigation elements that do not meet performance or final success criteria. 			
<p>Impact BIO-4: The project would conflict with local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.</p>				

MITIGATION MONITORING AND REPORTING PROGRAM				
Impact	Mitigation Measure	Implementation and Timing	Implementation & Monitoring Responsibility	Verified Implementation
Less than Significant with Mitigation	<p>Mitigation Measure BIO-4a:</p> <p>The subdivision plans for the reduced intensity alternative, Alternative 2, shall be revised to ensure that all of the resulting parcels can be developed without intrusion into the 100-foot wetland buffer so as to be consistent with Policy 6-57 Land Divisions of the 2020 LCLUP.</p>	<p>Plan revision prior to construction, Wetland Restoration and Monitoring Plan to be submitted prior to issuance of grading permit</p>	<p>Implementation: Project Applicant, Contractor, Qualified Restoration Ecologist</p> <p>Monitoring: Community Development Department</p>	<p>Initials: _____ Date: _____</p>
Less than Significant with Mitigation	<p>Mitigation Measure BIO-4b:</p> <p>Residential development of the subdivided 1.15-acre site north of Seymour Street shall comply with all applicable wetland buffer requirements. Furthermore, site development shall not result in direct or indirect water quality impacts that could occur due to adjacent development. During construction, suitable erosion control, sediment control, source control, treatment control, material management, and stormwater management measures would be used in conformance with the NPDES Statewide Construction General Permit (Order No. 2009-0009-DWQ). Additionally, the project will be designed to comply with the California Regional Water Quality Control Board, San Francisco Bay Region, Municipal Regional Stormwater NPDES Permit (MRP) (Water Board Order No. R2-2009-0074). This will require that the project implement BMPs into the design that prevents stormwater runoff pollution, promotes infiltration, and holds/slows down the volume of water coming from a site. In order to meet these permit and policy requirements, projects must incorporate the use of tree planters, grassy swales, bioretention and/or detention basins, among other factors. The site is already largely designed to preserve existing drainage characteristics, as seen by the placement of stormwater treatment basins near the area of the site where the seasonal wetlands occur. These basins shall be designed to drain to the</p>	<p>Ongoing throughout construction, Wetland Restoration and Monitoring Plan to be submitted prior to issuance of grading permit</p>	<p>Implementation: Project Applicant, Contractor, Qualified Restoration Ecologist</p> <p>Monitoring: Community Development Department</p>	<p>Initials: _____ Date: _____</p>

MITIGATION MONITORING AND REPORTING PROGRAM				
Impact	Mitigation Measure	Implementation and Timing	Implementation & Monitoring Responsibility	Verified Implementation
	avoided wetland area to preserve hydrological inputs from the site.			
CULTURAL RESOURCES				
<p>Impact CUL-1. The project has the potential to cause a substantial adverse change in the significance of a previously undiscovered historical resource, Impact CUL-2. The project has the potential to cause a substantial adverse change in the significance of a previously undiscovered archaeological resource, Impact CUL-4. The project has the potential to directly or indirectly destroy a unique paleontological resource or site or unique geologic feature, and Impact CUL-5. The project has the potential to cause substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe as defined in PRC Sections 5020.1(k) or 5024.1.</p>				
<p>Less than Significant with Mitigation</p>	<p>Mitigation Measure CUL-1: Prior to commencement of ground-disturbing activities, the project proponent shall consult with the City and retain a qualified tribal monitor to observe ground disturbing activities. In addition, in the event that any prehistoric, historic, archaeological, or paleontological resources are discovered during grading/excavation, a professional (historian, archaeologist, and/or paleontologist, as determined appropriate and approved by the City) shall be hired to assess the significance of the find. Qualifications of the selected professional and tribal consultant(s) shall be submitted to the City for approval prior to any grading activities.</p> <p>If any find is determined to be significant, representatives of the City and the consulting professional shall determine, with the input of any traditionally and culturally affiliated California Native American tribe, the appropriate avoidance measures, such as planning greenspace, parks, or other open space around the resource to preserve it and/or its context (while protecting the confidentiality of its location to the extent feasible) or other appropriate mitigation, such as protecting the historical or cultural value of the resource through data recovery or preservation.</p> <p>In considering any suggested mitigation proposed by the consulting professional to mitigate impacts to cultural resources, the City shall determine whether avoidance is feasible in light of</p>	<p>Tribal monitor secured prior to commencement of ground-disturbing activities. Ground disturbing activities to be monitored throughout construction</p>	<p>Implementation: Project Applicant, Contractor, Tribal Monitor(s)</p> <p>Monitoring: Community Development Department and/or consulting historian, archeologist, or paleontologist as determined to be needed</p>	<p>Initials: _____ Date: _____</p>

MITIGATION MONITORING AND REPORTING PROGRAM				
Impact	Mitigation Measure	Implementation and Timing	Implementation & Monitoring Responsibility	Verified Implementation
	<p>factors such as the nature of the find, project design, costs, and other considerations.</p> <p>If avoidance is infeasible, other appropriate measures, such as data recovery, shall be instituted. The resource shall be treated with the appropriate dignity, taking into account the resource's historical or cultural value, meaning, and traditional use, as determined by a qualified professional or California Native American tribe, as is appropriate. Work may proceed on other parts of the project site while mitigation for cultural resources is carried out. All significant cultural materials recovered shall, at the discretion of the consulting professional, be subject to scientific analysis, professional museum curation, and documentation according to current professional standards.</p> <p>At the City's discretion, all work performed by the consulting professional shall be paid for by the proponent and at the City's discretion, the professional may work under contract with the City.</p>			
GEOLOGY AND SOILS				
Impact G&S-1. The project would be located on soil that is unstable, resulting in on-site subsidence, liquefaction, or collapse, Impact G&S-2. The project would be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life and property, and Impact CUL-4. The project has the potential to directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.				
Less than Significant with Mitigation	<p>Mitigation Measure GEO-1: The project design shall include all recommendations described in the Geotechnical Investigation including but not limited to:</p> <ul style="list-style-type: none"> • Over-excavation of surface soil layers, and addition of compacted fill • Use of non-expansive fill • Shoring of utility trenches • The retention of a corrosion engineering specialist for corrosion protection recommendations • Retention of a licensed Geotechnical Engineer approved by the City to review geotechnical aspects of the project plans 	Geotechnical recommendations included in grading and building submittals. To be verified at permit issuance.	<p>Implementation: Project Applicant, Contractor</p> <p>Monitoring: Community Development Department</p>	<p>Initials: _____ Date: _____</p>

MITIGATION MONITORING AND REPORTING PROGRAM				
Impact	Mitigation Measure	Implementation and Timing	Implementation & Monitoring Responsibility	Verified Implementation
	<ul style="list-style-type: none"> Geotechnical observation and testing during earthwork and foundation construction 			
HAZARDS AND HAZARDOUS MATERIALS				
Impact HAZ-1. The project would create a significant hazard to the public and environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment, and Impact HAZ-2. Project construction would involve handling hazardous substances within one-quarter mile of an existing school.				
Less than Significant with Mitigation	<p>Mitigation Measure HAZ-1: Prior to issuance of a grading permit, a Phase II environmental site assessment (Phase II ESA) shall be conducted and shall include water and soil testing at the project site. The project applicant and the contractor shall implement the prescribed avoidance and remediation measures to protect workers and the public from any hazardous materials found at the site as identified in the Phase II ESA and site testing results. A plan to remediate any contamination in excess of standards shall be submitted to the appropriate reviewing authority. The remediation areas shall also be indicated on grading plans. The remediation could include measures such as contaminated soil removal and disposal, dewatering and containment of polluted groundwater, and other containment and control measures to avoid exposure to concentrations of contaminants in excess of standards and in accordance with Department of Toxic Substances Control and Occupational Safety and Health Administration standards. Documentation for the implementation of any necessary remediation measures shall be transmitted to the City and the appropriate reviewing authority as proof of implementation of the remediation plan.</p>	<p>Phase 2 ESA provided prior to issuance of a grading permit.</p> <p>Phase 2 ESA recommendations implemented prior to issuance of building permits.</p>	<p>Implementation: Project Applicant, Contractor</p> <p>Monitoring: Community Development Department</p>	<p>Initials: _____</p> <p>Date: _____</p>
NOISE AND VIBRATION				
Impact NOI-1. The project would exceed thresholds for ambient noise levels as a result of construction and operation.				
Less than Significant with Mitigation	<p>Mitigation Measure NOI-1a: Construction Best Management Practices. Prior to issuance of a grading permit, the applicant shall develop a construction noise control plan meeting the approval of the City Manager or his/her designee and/or third-party peer review, including, but not limited to, the performance standards listed below. The applicant shall employ an acoustical</p>	<p>Noise Control Plan prepared and submitted prior to issuance of grading permit.</p>	<p>Implementation: Project Applicant, Contractor, Qualified Acoustical Consultant</p>	<p>Initials: _____</p> <p>Date: _____</p>

MITIGATION MONITORING AND REPORTING PROGRAM				
Impact	Mitigation Measure	Implementation and Timing	Implementation & Monitoring Responsibility	Verified Implementation
	<p>consultant pre-approved by the City Manager or designee, to ensure the efficacy of the noise control plan. The acoustical consultant shall conduct onsite checks during construction to ensure that nuisance noise is being reduced in accordance with the noise control plan. Monthly reports shall be submitted to City Manager's office for the duration of construction or until such time that the City Manager or designee deems it no longer necessary.</p> <ul style="list-style-type: none"> • Installation of temporary sound barriers/blankets along the northern and eastern project boundary line adjacent to the single-family receivers. The temporary barriers/blankets shall have a minimum 5 dBA reduction. The temporary barriers/blankets will be of sufficient height to extend from the top of the temporary construction fence and drape on the ground or be sealed at the ground. The temporary barriers/blankets will have grommets along the top edge with exterior grade hooks, and loop fasteners along the vertical edges with overlapping seams, with a minimum overlap of 2 inches. • Equip all internal combustion engine-driven equipment with intake and exhaust mufflers that are in good condition and appropriate for the equipment. • Unnecessary idling of internal combustion engines should be strictly prohibited. • Locate stationary noise-generating equipment, such as air compressors or portable power generators, as far as possible from sensitive receptors as feasible. If they must be located near receptors, adequate muffling (with enclosures where feasible and appropriate) shall be used to reduce noise levels at the adjacent sensitive receptors. Any enclosure openings or venting shall face away from sensitive receptors. • Utilize "quiet" air compressors and other stationary noise sources where technology exists. • Construction staging areas shall be established at locations that will create the greatest distance between 	<p>Onsite noise checks to be conducted throughout construction</p>	<p>Monitoring: Community Development Department and Acoustical Consultant</p>	

MITIGATION MONITORING AND REPORTING PROGRAM				
Impact	Mitigation Measure	Implementation and Timing	Implementation & Monitoring Responsibility	Verified Implementation
	<p>the construction-related noise sources and noise-sensitive receptors nearest the project site during all project construction.</p> <ul style="list-style-type: none"> • Locate material stockpiles, as well as maintenance/equipment staging and parking areas, as far as feasible from residential receptors. • Control noise from construction workers' radios to a point where they are not audible at existing residences bordering the project site. • As part of the Noise Control Plan the contractor shall prepare a detailed construction schedule for major noise-generating construction activities. The Plan shall identify a procedure for coordination with adjacent residential land uses so that construction activities can be scheduled to minimize noise disturbance, and will be reviewed by the City. • Designate a "disturbance coordinator" who would be responsible for responding to any complaints about construction noise. The disturbance coordinator will determine the cause of the noise complaint (e.g., bad muffler, etc.) and will require that reasonable measures be implemented to correct the problem. Conspicuously post a telephone number for the disturbance coordinator at the construction site and include in it the notice sent to neighbors regarding the construction schedule. 			
Less than Significant with Mitigation	<p>Mitigation Measure NOI-1b: Nighttime Truck Delivery. To minimize the noise impact associated with truck deliveries, it is assumed that deliveries shall only occur between 7:00 a.m. and 10:00 p.m. Based on the size of the proposed land use, smaller delivery and vendors would be expected for the proposed project. These trucks typically generate maximum noise levels of 65 to 70 dBA at a distance of 50 feet. The noise levels due to deliveries at the nearest sensitive receptors would range from 60 to 65 dBA. Compared to the ambient noise environment, which has maximum instantaneous noise levels ranging from 67 to 107 dBA L_{max} (maximum sound level) and hourly average noise levels ranging from 60 to 75 dBA L_{eq} (equivalent continuous</p>	Ongoing throughout project operation	Project Operator	Initials: _____ Date: _____

MITIGATION MONITORING AND REPORTING PROGRAM				
Impact	Mitigation Measure	Implementation and Timing	Implementation & Monitoring Responsibility	Verified Implementation
	noise level), truck deliveries would not be expected to increase the existing noise environment, assuming daytime deliveries only.			
TRANSPORTATION AND TRAFFIC				
Impact TRA-1. The project would conflict with CEQA Guidelines section 15064.3, subdivision (b).				
Less than Significant with Mitigation	<p>Mitigation Measure TRA-1: TDM Program and Monitoring</p> <p>a. The applicant shall draft and implement a TDM Program with measures that would achieve an annual average VMT reduction of at least 15 percent. The hotel operator shall propose a TDM program that contains specific measures to achieve a 15 percent VMT reduction, which is necessary for compliance with the TDM Program. The TDM Program shall be updated from time to time, as deemed appropriate by the City, to reflect best practices in the field of Transportation Demand Management.</p> <p>b. As part of the hotel operations, the hotel operator shall conduct mode split and VMT surveys each year to both make adjustments and use as marketing material. Guest and employee satisfaction surveys are also an effective way of ensuring a quality TDM program. The designated hotel Transportation Coordinator shall provide a copy of the updated TDM program to the City Manager and Traffic Engineer annually on the date of issuance of the use and occupancy/operating permit.</p> <p>c. When preparing, adopting, or updating the TDM Program, the hotel operator shall implement the TDM plan with a single occupancy vehicle (SOV) mode-share reduction commitment of 15 percent.</p>	Operation	Project Applicant, Qualified City Staff	Initials: _____ Date: _____

Source: Circlepoint, 2024

Appendix 3.0-A: Attachment to EIR Text Revisions

The purpose of this Appendix is to present the modifications to the Draft EIR, Chapter 5.0, Alternatives. Following circulation of the Draft EIR, the applicant submitted revised plans to the City indicating that Alternative 2 (with revisions) is now the Proposed Project that would be considered for approval, as explained in Chapter 1.0 of this Final EIR.

Changes to Chapter 5.0 are denoted by vertical lines within the right and left margins.

The text revisions described in this chapter are to the Draft EIR. Therefore, throughout this chapter, the term “project” refers to the Original Project that was analyzed at the time the Draft EIR was published.

5.0 ALTERNATIVES

5.1 INTRODUCTION

In accordance with California Environmental Quality Act (CEQA) Guidelines Section 15126.6, this draft Environmental Impact Report (draft EIR) contains a comparative impact assessment of alternatives to the proposed Hyatt Place Project (project). The primary purpose of this section is to provide decision makers and the public with a range of reasonable project alternatives that could feasibly attain most of the basic project objectives while avoiding or substantially lessening any of the project's significant adverse environmental effects. Important considerations for these alternatives analyses are described below:

- An EIR need not consider every conceivable alternative to a project
- An EIR should identify alternatives that were considered by the lead agency but rejected as infeasible during the scoping process
- Reasons for rejecting an alternative include:
 - Failure to meet most of the basic project objectives;
 - Infeasibility; or
 - Inability to avoid any significant environmental impact

5.2 PROJECT OBJECTIVES

As described in **Chapter 3.0, Project Description**, the City's primary project objectives are as follows:

- Implement the California Coastal Act, including protecting coastal resources such as wetlands and providing coastal zone priority uses such as restaurants and accommodations geared towards visitors, especially lower coast coastal access provisions including lower cost accommodations on or off-site and/or public access and recreation benefits such as airport shuttles, bicycle rentals, or trail connections.
- Conform with the Local Coastal Program, including promotion of bicycle and pedestrian trails, such as along State Route 1 (SR-1) and the Downtown area.
- Enhance Half Moon Bay's southern entrance to the city by:

- Providing connectivity to local trails and the downtown core
- Supporting the City's plans to highlight access to Main Street, Historic Downtown, and the commercial core
- Providing a development that is aesthetically pleasing by balancing the urban landscape with natural elements of the coast
- Integrating the artisanal culture of Half Moon Bay into the design theme of the development and the project site
- Enhancing access to and patronage of the adjacent theater
- Be designed as contextually appropriate for the city and provide compatibility with both the Downtown and the adjacent residential neighborhood with building massing reflective of traditional development and scale within the city and providing maintenance of adequate views.
- Be designed to be compatible with and enhance the aesthetic of the south entry to the city.
- Be served by existing public infrastructure including water supply, sewer and roadway capacity and through on-site provision of green infrastructure for storm water management.
- Support Downtown vitality and the City's economic development goals.
- Meet the demand for more hotel rooms to support the city's growing local tourist and agribusiness economies.
- Establish a higher level of use on an underused parcel in the city.
- Support the local job market by providing new employment opportunities.
- Provide an opportunity for the City to increase revenue stream.

The project applicant's objectives for the project are as follows:

- Develop a mid-range hotel to fill a gap in the market.
- Provide a conference and wedding venue primarily for hotel guests.
- Provide service sector employment opportunities for Half Moon Bay residents.
- Provide public recreational opportunities through a multi-use bicycle and pedestrian path, which will become part of the City's circulation plan.
- Provide shuttle transportation for hotel guests to beaches, harbor points of interest and downtown areas.
- Create a destination at the southern end of Main Street which will indirectly support the existing retail, hospitality, restaurants, and entertainment venues in the downtown area.

- Encourage pedestrian use of the southern portion of Main Street by providing infrastructure improvements including installing a curb, gutters, sidewalk, and landscaping between Seymour Street and the SR-1/Main Street intersection.

5.2.1 LOCAL COASTAL PROGRAM

As indicated above in **Section 5.2, Project Objectives**, one of the City’s and project applicant’s project objectives is for project conformance with the Local Coastal Program, which consists of the Local Coastal Land Use Plan (LCLUP) and the City’s Zoning Ordinance (often referred to as the Local Coastal Implementation Plan). The LCLUP, which is the policy component of the Local Coastal Program, contains policies for residential development. While the project does not include a residential element, project alternatives that include a residential component would need to be assessed for their consistency with applicable policies of the LCLUP. Policies pertaining to residential development that are anticipated to apply to project alternatives are outlined in **Table 5-1**.

Table 5-1 Applicable LCLUP Policies for Residential Alternatives

Applicable Policy	Policy Contents
2-16: Residential Growth Management	Provide for compatible and orderly residential growth at a managed pace and ensure that future development is consistent with the City’s growth management standards. Measure D (Residential Growth Limitation Ordinance) added the following provisions to the Land Use Plan and they may not be amended or repealed except by a majority vote of the people of Half Moon Bay as follows: The number of dwelling units which the City may authorize each calendar year may not exceed the number of units which would result in a growth of 1 percent in the City’s population as of January 1 of that year. In determining the number of permissible units, the City shall use the most recent United States Census figures for Half Moon Bay to calculate the average number of persons per household. The number of dwelling units authorized each year under subsection a. may be increased by 50 percent for additional dwelling units in the Downtown Area. Applications for new units from areas of the City outside the Downtown Area have priority for one-half of the units authorized under subsection a. If fewer applications are received, the remainder of these units may be authorized in the Downtown Area. Subject to subsections b. and c., the city shall allocate permissible dwelling units among applications under the existing allocation system in the Municipal Code, to the extent feasible, and subsequent modifications by the City Council. The limitations in the Section shall not apply to replacement of existing dwelling

Applicable Policy	Policy Contents
	units on a one-for-one basis, nor shall it apply to density bonuses for the provision of low and moderate income housing to the extent required by State law. The Downtown Area is the area designated as the Downtown Half Moon Bay Redevelopment Survey Area in City Resolution No. C-91-98, November 3, 1998.
2-21: Lot Retirements	<p>Require mitigation for the individual and cumulative impacts of development when a new residential lot is created through retirement of development potential on an existing and separate lot, pursuant to the following criteria:</p> <ol style="list-style-type: none"> a. At least the same number of lots shall be retired as are created; b. The retired lot(s) shall be located within city limits and have potential for residential development, including lots with PD land use designations where residential development is a potentially permitted use; c. Retirement of development potential may occur through recordation of a no-build restriction, an accepted offer to a land trust, or through an in-lieu fee to support such retirement; and d. Deed restricted affordable housing shall be exempt from lot retirement requirements.
2-81: Mixed-Use Development	Permit horizontal and vertical mixed-use development to incorporate residential development in the Commercial – General, Commercial – Visitor-Serving, and in certain cases, Light Industrial land use designations.
5-61: Parkland Standard	Provide a minimum of 5 acres of City parkland including neighborhood and community park area for each 1,000 city residents, with additional parkland for specialized and low use park acreage. The parkland standard shall ensure that new development accommodates the recreational needs of future residents in pace with population increase.
6-57: Land Divisions	Design land divisions, including lot line adjustments, to preclude new development within and minimize impacts to ESHAs and their buffer areas. Land divisions shall only be permitted if each new parcel being created could be developed (including construction of any necessary access road), without building in ESHA or ESHA buffers, or removing ESHA for fuel modification. Require any new land divisions containing areas of ESHA or ESHA buffer zones to record a deed restriction that protects such areas from non-resource dependent development. Require any new land divisions near ESHA to accommodate migration of ESHA as a result of the impacts of sea level rise.

Source: City of Half Moon Bay, 2021.

5.3 SUMMARY OF IMPACTS

5.3.1 SIGNIFICANT IMPACTS

Based on the analysis completed for the Draft EIR, the project's impacts in the following resource areas were considered significant without the implementation of mitigation measures.

- **Aesthetics:** The proposed hotel structure on the project site would have a substantial effect on a scenic vista, impact scenic resources within a state scenic highway, degrade the quality of public views from a publicly accessible vantage point, and produce new sources of light and glare.
- **Air Quality:** Project construction would result in a cumulatively considerable net increase of criteria pollutants (fugitive dust) and would temporarily expose sensitive receptors to substantial pollutant concentrations.
- **Biological Resources:** Project construction would result in impacts to special-status wildlife, aquatic habitat, federally protected wetlands, and protected trees.
- **Cultural and Tribal Cultural Resources:** Construction activities have the potential to impact undiscovered historic resources, archaeological resources, paleontological resources, tribal cultural resources, and/or human remains during the construction period.
- **Geology and Soils:** The project would be subject to geologic hazards, such as on-site subsidence, liquefaction, or collapse. The project would also be located on moderately expansive soils, which have the potential to create a substantial direct or indirect risk to life and property.
- **Hazards and Hazardous Materials:** Project construction would create a significant hazard to the public and environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. Construction activities would also mobilize residual agrichemicals or hazardous building materials within one-quarter mile of an existing school during the construction period.
- **Noise:** Sensitive receptors adjacent to the project site would be exposed to construction noise.

- **Transportation and Traffic:** Implementation of the project would conflict with section 15064.3, subdivision (b).

Each of the impacts described above, except for aesthetic impacts, would be avoided or reduced to a less-than-significant level with the implementation of mitigation measures or standard conditions of approval. However, impacts related to aesthetics resources are significant and unavoidable, as implementation of the project would have a substantial adverse effect on a scenic vista, impact scenic resources within a state scenic highway, and degrade the visual quality of views from a publicly accessible vantage point. These impacts are further described in **Section 5.3.2, Significant and Unavoidable Impacts** below.

5.3.2 SIGNIFICANT AND UNAVOIDABLE IMPACTS

The project has significant unavoidable adverse impacts to aesthetics as discussed below.

Impact AES-1. The project would have a Substantial Adverse Effect on a Scenic Vista.

Significant and Unavoidable. The project would interfere with the protected long-range views of the ridgelines north and east of the project site from SR-1 (Viewpoint 3). Although screening techniques and other design considerations would be used, the mass and scale of the proposed development would obstruct views of the protected ridgeline from SR-1. This is a significant and unavoidable impact.

Impact AES-2. The project would substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway

Significant and Unavoidable. The project site is located adjacent to SR-1. Although this section of SR-1 is not officially designated as a scenic highway, the City considers it as a visual area subject to regulations applicable to a scenic corridor, and specifically relies upon policy in the 2020 certified LCLUP.

Policy 9-12 Town Boulevard Scenic Corridor is especially applicable:

Require that new development in close proximity to or easily visible from the Town Boulevard scenic corridor, including Highways 1 and 92: a. Protects views of visual resource areas as seen from the Town Boulevard, including views to the ocean, upland slopes (i.e., minimizes

intrusions into the ridgeline), and the historic Johnston House; b. Incorporates design standards such as screening of commercial parking areas and landscaping provisions; and c. Is visually compatible with the surrounding land and development. Update the IP with additional standards for new development along the Town Boulevard based on additional study of the scenic corridor. Assessment should, at a minimum, consider views of visual resource areas from the perspective of existing and potential development along the Town Boulevard and identify scenic segments along Highway 1 and 92, including views of the ridgelines and other visual resource areas. Development standards should address, at a minimum, appropriate building heights and setbacks, longest wall lines, minimum space between buildings, and streetscape design.

The proposed site development, including buildings and landscaping, in conjunction with the gateway right-of-way improvements, include numerous approaches to reduce impacts to scenic resources, especially with respect to ridgeline views of the Santa Cruz Mountains and foothills from SR-1. These features and design considerations are described below:

Buildings: Project design has incorporated appropriate setbacks of 38 to 100 feet, which surpasses the setback minimum of 30 feet. In addition, project design has provided a sizable buffer between SR-1 and the structures to avoid impacts to wetlands and provides a larger setback from SR-1 reducing the visual encroachment into views from SR-1 and the Wavecrest area looking east and north. The project design also includes design elements that minimize massing of the proposed two- to three-story high buildings, such as incorporating the third story of the lodging buildings within a dormer roof form and by stepping the height down toward the southern gateway corner.

Landscaping: The landscape plan has three primary components: the “gateway” side of the site (described below), the SR-1 or west side of the site, and the Main Street or east side of the site. The west side of the site includes wetlands and the proposed landscaping consists of a mix of species found in the adjacent Wavecrest area that are compatible with seasonal wetland habitats and include coastal terrace prairie species. Landscaping on the east side of the property would consist of ornamental trees, shrubs, vines and groundcovers. Street trees would be generally retained, and parking lot trees would be dispersed to provide filtered shade and a canopy throughout the lot. Some tree removals would be necessary to accommodate the development. It is estimated that seven bottlebrush street trees along the eastern side of the project site along Main Street would be removed. Trees would be planted to replace the ones removed. Landscaping and trees proposed with project design would contribute to the visual character of scenic resources visible

from SR-1, especially the west side of the site where landscaping will be consistent with habitats found in Wavecrest, including coastal terrace prairie.

Gateway: The southern entryway project includes a new monument sign and landscaping as part of a signalization project to identify the southern entrance to Main Street and the city from SR-1, which is shown in **Figure 4.1-8 (Section 4.1, Aesthetics)**. The project implements a gateway at the south end of Downtown Half Moon Bay. The monument sign and accompanying landscaping will create a foreground and visual transition to views of the proposed hotel structures from northbound SR-1. The project landscaping on the south end of the site will provide a transition between the city's gateway and the buildings.

Notwithstanding the project design treatments discussed above, project implementation would still impact views of scenic resources visible from the highway, specifically the ridgelines of the Santa Cruz Mountains and foothills, would be encroached upon by the project. There is no feasible mitigation available that would improve impacts to the viewshed given the mass and scale of the project. This impact is considered significant and unavoidable.

Impact AES-3. The project would substantially degrade the existing visual character or quality of public views of the site and its surroundings.

Significant and Unavoidable. Project design was developed with the intention of reflecting the visual character and visual quality of the project site's surroundings, as well as maintaining the quality of public views to preserve the heritage and character of the city. Build out of the project would result in permanent changes in the existing visual quality of public views to the project site and its surroundings, namely the long-range views of the hillsides and ridgeline available from publicly accessible viewpoints near the project site. Changes to the project site and the surrounding visual character would be consistent with the developed nature of Downtown, although the buildings are significantly larger and present longer facades than existing development patterns throughout Downtown and in the immediate neighborhood. Although the project would incorporate high quality design elements, landscaping, and screening techniques that would address changes in visual character, the visual quality of the project site as seen from public viewpoints is conservatively considered to be adversely affected by the project, given the circumstances of the project site and the proposed development (described further in **Section 4.1, Aesthetics**). This impact is considered significant and unavoidable.

Cumulative Aesthetic Impacts

The project would cumulatively contribute to the degradation of established viewsheds, or other scenic vistas especially the long-range views of hillsides and ridgelines in Half Moon Bay. Notwithstanding the design and setbacks required of the project, it would still contribute to a cumulative impact on aesthetics and visual resources due to the permanence of the project site aesthetics and the obstruction of hillside and ridgeline views from SR-1.

5.4 ALTERNATIVES CONSIDERED BUT REJECTED FOR FURTHER ANALYSIS

CEQA Guidelines Section 15126.6(c) requires that an EIR identify any alternatives that were considered by the Lead Agency but rejected as infeasible. The EIR must briefly explain the reasons underlying the Lead Agency's determination to reject an alternative. The following factors may be used to eliminate alternatives from further consideration:

- (i) Failure to meet most of the basic project objectives
- (ii) Infeasibility
- (iii) Inability to avoid significant environmental impacts

As stated in Section 15126.6(f)(1) of the Guidelines, factors that may be considered when a lead agency is assessing the feasibility of an alternative include:

“Site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries (projects with a regionally significant impact should consider the regional context), and whether the proponent can reasonably acquire, control, or otherwise have access to the alternative site (or the site is already owned by the proponent).”

The project has been developed to meet the previously identified objectives while avoiding or minimizing environmental impacts. The project was chosen based on the multiple planning efforts listed in **Chapter 3.0, Project Description**, which considered various environmental impacts of the area.

5.4.1 ALTERNATIVE SITE LOCATIONS

CEQA Guidelines Section 15126.6(f)(2) states that an EIR must consider off-site alternatives unless such alternatives are determined to be feasible by the Lead Agency. If the lead agency concludes that no feasible alternative locations exist, it must disclose the reasons for this conclusion, and should include the reasons in the EIR.

North of Project Site: The project applicant has site control over the auto dealership to the north of the project site. However, as stated below in **Section 5.5.2, Reduced Intensity, Modified Alternative 2**, in lieu of the hotel project, it would be more economically viable for the project applicant to expand the dealership south and subdivide the north portion of the dealership which has R-2 zoning for future development of residential uses. The applicant has therefore determined that locating the hotel project, or a portion of the hotel project, on the existing dealership site is not feasible.

Downtown Area: The Downtown area, especially the “Town Center” as delineated by the Half Moon Bay LCLUP, is the City’s preferred location for visitor-serving commercial development of any significant scale. The project applicant does not own any large-scale sites in the Downtown area that could accommodate this project. Furthermore, the only other site of this scale in the Downtown area is at the southeast corner of SR-1 and SR-92 adjacent to Pilarcitos Creek and in a flood plain. The property’s zoning could potentially allow for a hotel of some scale; however, the numerous site constraints, including access, may limit its future development for such a project.

Outside Downtown Area: The only sites of adequate size that could potentially accommodate the proposed development are in Planned Development areas. Many of these areas have multiple owners; and most are west of SR-1 where numerous environmental and visual resource constraints exist, such as the potential obstruction of broad ocean views. Such constraints are similar to those on the project site where wetlands are present and visual resource protections are required for views of the hillsides and ridgelines from SR-1. Thus, from the perspective of Coastal Act requirements, these alternative sites would not reduce any project impacts.

Because the project would include the creation of a hotel and associated features, an off-site alternative would not be feasible in other potential sites due to the aforementioned constraints associated with each site. There are currently no off-site alternatives available within the general area of Half Moon Bay that would meet the City’s and project applicant’s objectives. The significant effects of the project would not be avoided or substantially lessened by moving the project site.

5.4.2 ALTERNATIVE DEVELOPMENT SCENARIOS

The project applicant considered several development scenarios that were ultimately rejected because they did not meet City objectives or project applicant objectives.

Auto Dealership Expansion Scenario: An alternative development scenario that was considered but rejected proposed expansion of the James Ford Auto Dealership. The Auto Dealership Expansion scenario would not involve construction of a hotel or any residential units.

Hotel with Increased Number of Rooms Scenario: Earlier versions of the Proposed Project included an increased number of rooms, up to 149. This development scenario did not comply with the City's 100-foot wetland buffer requirement. Further, the development scenario involved construction of one large structure to contain all hotel rooms and facilities.

5.5 ALTERNATIVES ANALYZED

This section provides a range of reasonable project alternatives that could feasibly attain most of the basic project objectives while avoiding or substantially lessening some of the project's significant adverse environmental effects.

The following analysis describes the extent to which the alternatives meet or do not meet the City's and project applicant's primary project objectives as described in **Chapter 3.0, Project Description**, and discussed above. This section also evaluates whether Alternative 1, Modified Alternative 2, or Alternative 3 would reduce the significant impacts of the project to less-than-significant levels. This analysis considers whether Alternative 1, Modified Alternative 2, or Alternative 3 would generate impacts other than those that would occur as a result of the project. For each environmental topic, the study area discussed below is the same as the study area established for the topic in **Chapter 4.0, Setting, Impacts, and Mitigation Measures**, unless otherwise noted. Mitigation measures developed for the project are referred to in the analysis below; these mitigation measures are fully described in each resource section within **Chapter 4.0, Setting, Impacts, and Mitigation Measures**. A summary comparison of project impacts and impacts from alternatives is provided in **Table 5-2** at the end of this section.

5.5.1 NO PROJECT, ALTERNATIVE 1

State CEQA Guidelines Section 15126.6 (e) (1) requires that the no project alternative be described and analyzed “to allow decision makers to compare the impacts of approving the project with the impacts of not approving the project.” The no project analysis is required to discuss “the existing conditions at the time the notice of preparation is published... as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services” Section 15126.6 (e)(2)).

Under the No Project alternative, Alternative 1, the project site would remain in its current undeveloped state and there would be no development of the structures or uses. The project site would remain in its undeveloped condition as a vacant lot.

Ability to Accomplish Project Objectives

Under Alternative 1, the project site would remain in its current undeveloped state and no development of the structures or uses would occur. The project site would remain in its undeveloped condition as a vacant lot. Under this alternative, the City’s and project applicant’s project objectives would not be met.

Environmental Impacts

Under the No Project alternative, Alternative 1, the existing conditions at the project site would remain unchanged. Therefore, there would not be any interference with long-range views of the ridgelines or impacts to views along SR-1. Alternative 1 would have no impact on aesthetic resources. Alternative 1 also would have no impact to biological resources at the project site, and would not contribute to air quality emissions, greenhouse gas (GHG) emissions, noise impacts, or traffic impacts.

5.5.2 REDUCED INTENSITY, MODIFIED ALTERNATIVE 2

A reduced intensity alternative, Modified Alternative 2, was proposed in response to public and agency feedback on the project during release of the Notice of Preparation for the project as well as during public forums with the City for the project. This public and agency feedback identified the concept of a smaller hotel and addressed the need for additional housing in the city.

Modified Alternative 2 also would reduce the overall massing of the project which in turn reduces the aesthetic impacts associated with the project.

Modified Alternative 2 would include construction of a 66,268 square-foot, 102-room hotel on the project site along with a four-lot parcel map allowing for future development of up to 16 dwelling units, along Seymour Street, frontage improvements to Seymour Street, (Figure 5-1) and the expansion of the car dealership parking lot. The hotel, as proposed under Modified Alternative 2, would consist of two main buildings, a north building and a south building, and a parking lot that faces Main Street. A third one-story building is proposed on the east side of the north building that would house a bicycle rental shop. The north building would be a three-story structure consisting of guestrooms and employee areas and the south building would be a two-story structure consisting of the lobby and public space, with guestrooms on the second level (Figure 5-2 and Figure 5-3).

The project site for Modified Alternative 2 was expanded to include a 1.15-acre parcel north of Seymour Street along SR-1, used by the auto dealership for extra parking. Modified Alternative 2 would require a lot line adjustment on the 5.02-acre parcel, adding 0.45 acres to the dealership and using the remaining 4.57 acres for the hotel and open space. Adding 0.45 acres to the dealership allows for the creation of a 4-lot subdivision on the north side of Seymour Street on the 1.15-acre parcel owned by the project applicant, for future development with residential units. Frontage improvements along Seymour Street would be completed with the construction of the residential units. Figure 5-4 shows the property division and phasing plan required for development of Modified Alternative 2. Upon completion of a subdivision map, Lot 1 would be developed with up to 4 units. Lots 2 through 4 would remain in use as parking for the dealership as needed but could be developed in the future with up to 12 dwelling units.

Under Modified Alternative 2, the building massing and number of guestrooms would be reduced, as compared to the project. The proposed conceptual site plans for Modified Alternative 2 are depicted in Figure 5-1, and Figure 5-5. The proposed structures under Modified Alternative 2 have been reduced, spanning a length of 466 feet across the longest frontage of the project site, which is less than the 608-foot length of the Project's five buildings and breezeways. The 466-foot span includes a 32-foot gap and breezeway between the two buildings. This makes up approximately 50 percent of the project site, which would maintain the balance of structures and open space on the project site. Figure 5-8 shows the proposed drainage system for the project site. Appendix I, Drainage Memorandum - Alternative 2, further illustrates how Alternative 2 would manage stormwater flows, enhance wetland buffer zones with native plants, and incorporate

source control measures and bioretention areas that help filter potential pollutants from the water system.¹

The hotel portion of Modified Alternative 2 differs from the project in the following ways:

- Guestrooms: Reduced from 129 to 102 rooms
- Parking Spaces: Reduced from 148 to 108 spaces
- Square Footage of Structures: Reduced from 90,784 square feet to 66,268 square feet; includes meeting space reduction from 2,700 square feet to 1,210 square feet
- Elimination of the pool and pool house
- Elimination of north parking area and alley from project site to Seymour Street
- Setbacks of proposed structures from the existing property lines:
 - South setback from Gateway has increased from 218 feet to 389 feet
 - East setback from Main Street has increased from 15 feet to 52 feet to the porte cochère and 81 feet to the building
 - North setback from Ford Dealership was reduced from 74 feet to 53 feet
 - West setback from SR-1 has increased from 35 feet to between 91 feet and 139 feet
- The subject property extends a length of 894 feet in a north to south direction. Proposed structures for Modified Alternative 2 have been reduced from spanning a length of 608 feet to 466 feet across the project site.
- Modified Alternative 2 consists of two primary structures and an ancillary structure to reduce overall massing:
 - A three-story structure (north building) consisting of guestrooms and employee areas
 - A two-story structure (south building) consisting of public space and guestrooms on the second level
 - An ancillary one-story structure next to the parking lot for bike rentals
- Modified Alternative 2 includes an improved parking lot layout and drive aisles that better accommodate service vehicles.

¹ Following circulation of the Draft EIR, the applicant submitted revised plans constituting Alternative 2 with modifications. Due to the minimal differences between the Reduced Intensity, Alternative 2, and the Modified Alternative, the analysis would be applicable to the Modified Alternative 2. Therefore, the conclusions in Appendix I, Drainage Memorandum – Alternative 2, would be the same for Modified Alternative 2.

- Modified Alternative 2 includes a detailed proposal for how this alternative would address mitigation for the conversion of agricultural land through payment of in-lieu fees in accordance with the Half Moon Bay LCLUP.
- Modified Alternative 2 includes a detailed proposal for how this alternative would address the provision of lower-cost visitor accommodations with a combination of lower-cost rooms and no-cost visitor-serving amenities available to the public in accordance with the Half Moon Bay LCLUP.

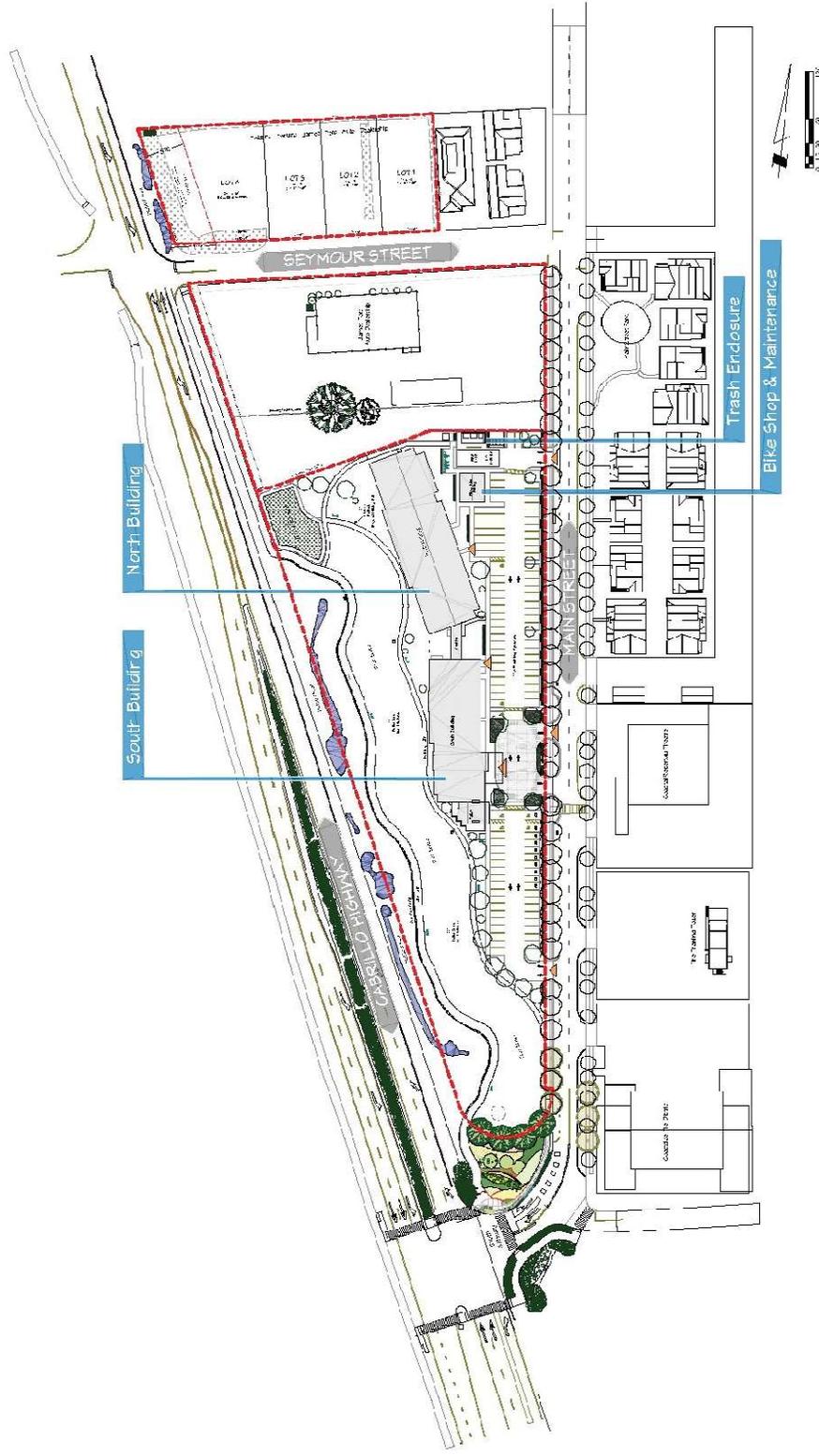


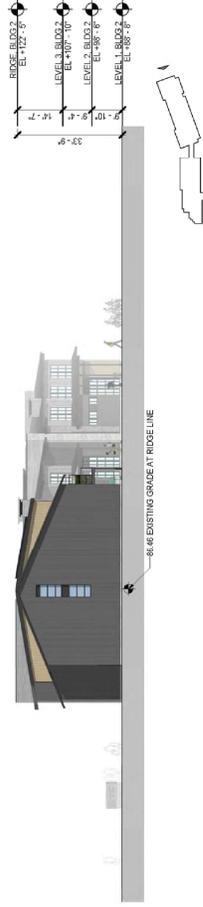
Figure 5-1

Proposed Site Layout

Source: AXIS/GFA Architecture + Design, 2024

Hyatt Place Half Moon Bay Project

NOTE REGARDING SURVEY DATA
SURVEY PERFORMED BY BOTL LAND SURVEYING
DATE OF FIELD SURVEY: JUNE, 2012
JOB NUMBER: 12546
SEE 100% FOR COMPLETE SITE DATA



NORTH ELEVATION - NORTH BUILDING
SCALE: 1/16" = 1'-0"

3



WEST ELEVATION - NORTH BUILDING
SCALE: 1/16" = 1'-0"

2



EAST ELEVATION - NORTH BUILDING
SCALE: 1/16" = 1'-0"

1

North Building Elevations

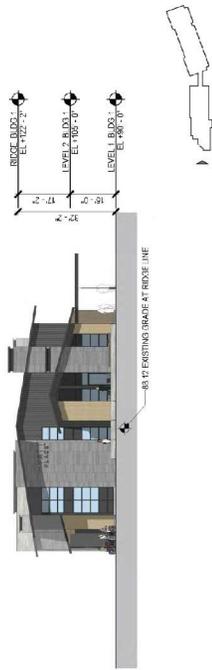
Figure

5-2

Source: AXIS/GFA Architecture + Design, 2024

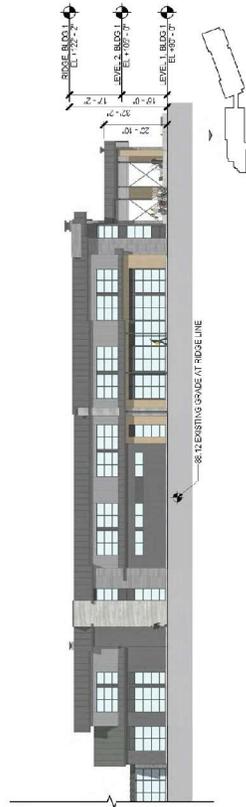
Hyatt Place Half Moon Bay Project

NOTE: RECORDS SURVEY DATA
 SOURCES PERFORMED BY BDT AND SURVEYING
 DATE OF FIELD SURVEY: JUNE 2012
 JOB NUMBER: 10006
 SEE TOPO FOR COMPLETE SITE DATA



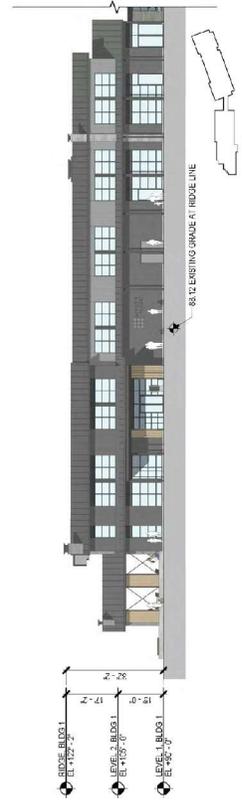
SOUTH ELEVATION - SOUTH BUILDING
 SCALE: 0"=10' = 1/4"=1'-0"

3



WEST ELEVATION - SOUTH BUILDING
 SCALE: 0"=10' = 1/4"=1'-0"

2



EAST ELEVATION - SOUTH BUILDING
 SCALE: 0"=10' = 1/4"=1'-0"

1

South Building Elevations

Figure

5-3

Source: AXIS/GFA Architecture + Design, 2024

Hyatt Place Half Moon Bay Project

PROPOSED PHASING PLAN

- 1). OBTAIN NECESSARY APPROVALS
 - HOTEL SITE
 - LOT LINE ADJUSTMENT ADDING LAND TO AUTO DEALERSHIP
 - PARCEL MAP CREATING 4 LOTS NORTH OF SEYMOUR ST.
- 2). BUILD HOTEL (18-24 MONTHS FOLLOWING APPROVALS)
 - INCLUDES BIKE PATH, WALKING PATH, BICYCLES, BUFFER ZONE
- 3). LAND ADDED TO DEALERSHIP (ADDITIONAL 2 MONTHS)
 - 5. BEFACE IMPROVEMENTS TO PARK VEHICLES
- 4). LAND NORTH OF SEYMOUR (ADDITIONAL 12 MONTHS)
 - DEVELOP LOT 1 WITH FOUR AFFORDABLE HOUSING UNITS
 - EACH UNIT CONSISTING OF 1 AND/OR 2 BEDROOMS
 - AFFORDABLE HOUSING UNITS TO BE LOW INCOME HOUSING FOR INCOMES RANGING BETWEEN 50%-80% OF MEDIAN INCOME LEVELS BASED ON SAN MATEO COUNTY YEARLY INCOME & RENT LIMITS
 - THIS AFFORDABLE HOUSING IS BEING DEVELOPED FOR EMPLOYEES OF JAMES FORD AND/OR THE PROPOSED HOTEL AS FIRST PRIORITY
 - MAINTAIN USING LOTS 2, 3, AND 4 AS PARKING FOR THE AUTO DEALERSHIP THAT EVENTUALLY WILL BE DEVELOPED AS MARKET RATE HOUSING IN THE FUTURE.

08/23/2024

PROPOSED LOTS NORTH OF SEYMOUR ST.

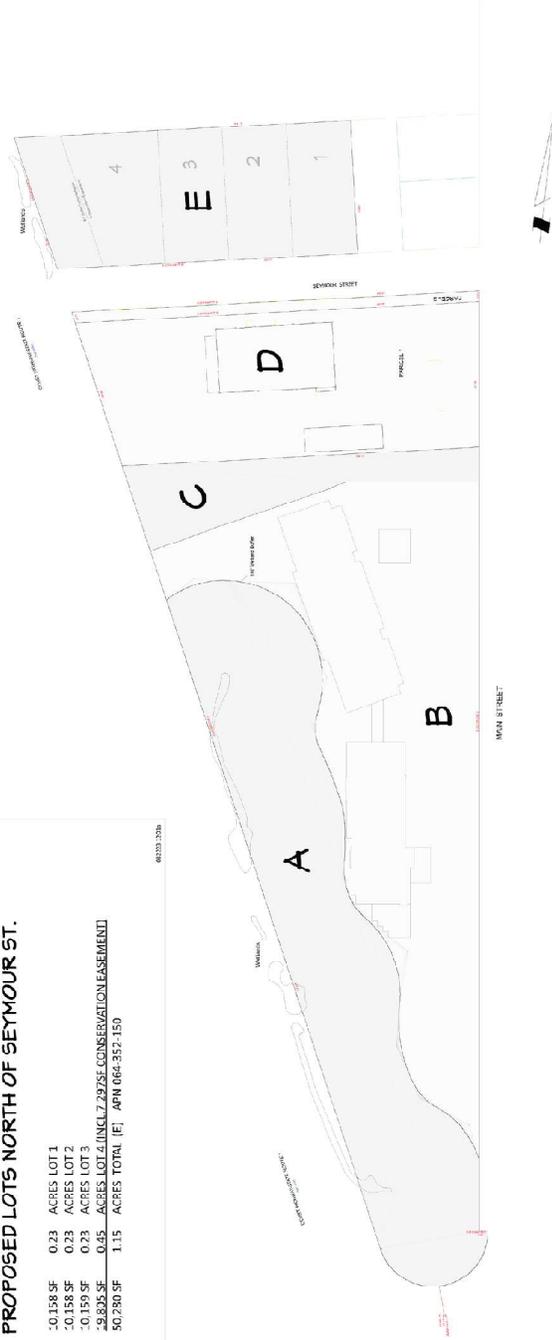
10,158 SF	0.23	ACRES	LOT 1
10,158 SF	0.23	ACRES	LOT 2
10,159 SF	0.23	ACRES	LOT 3
49,825 SF	0.55	ACRES	LOT 4 (INCL. 29% SETBACK CONSERVATION EASEMENT)
50,280 SF	1.15	ACRES	TOTAL (E) APM 064-357-150

08/23/2024

PROPERTY DIVISION

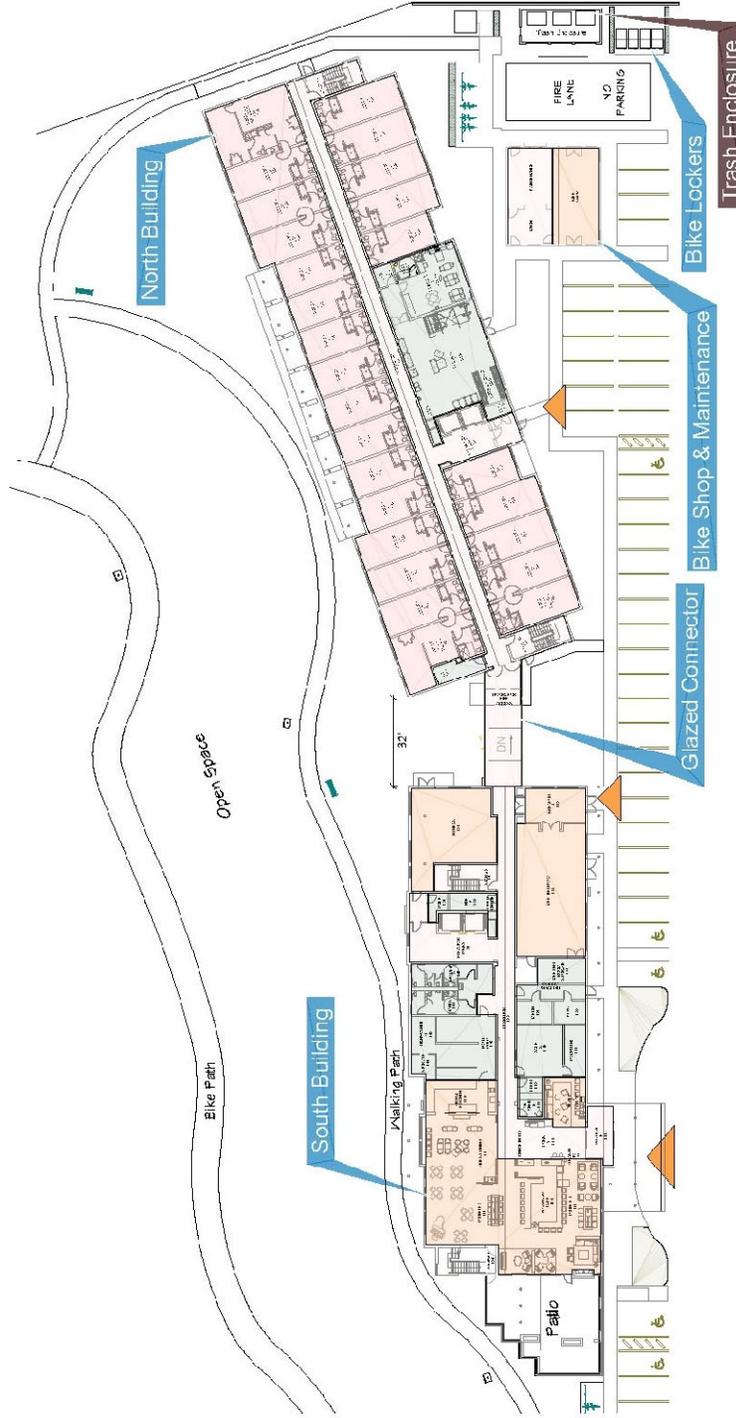
88,296	SF	2.02	ACRES	OPEN SPACE (A) WITH WETLAND CONSERVATION EASEMENT
111,026	SF	2.55	ACRES	HOTEL LOCATION (B)
49,730	SF	0.45	ACRES	ADDED LAND TO AUTO DEALERSHIP (C)
213,052	SF	5.02	ACRES	EXISTING VACANT PARCEL (A, B & C)
65,377	SF	1.50	ACRES	EXISTING AUTO DEALERSHIP (SOUTH OF SEYMOUR ST) PARCEL 1 (D)
439,730	SF	0.55	ACRES	ADDED LAND TO AUTO DEALERSHIP (C) WITH THE LOT LINE ADJ.
85,107	SF	1.95	ACRES	AFTER LOT LINE ADJUSTMENT IS NEW PARCEL 1 (C+D)
1,530.3	SF	0.12	ACRES	PARCEL 2 (D), I.E. STRIP SOUTH SIDE OF SEYMOUR ST.
50,410	SF	2.07	ACRES	TOTAL FOR AUTO DEALERSHIP (C+D ON SOUTH OF SEYMOUR ST.)
140,650	SF	3.15	ACRES	EXISTING AUTO DEALERSHIP (NORTH OF SEYMOUR ST.) (E)
50,280	SF	1.15	ACRES	TOTAL AUTO DEALERSHIP (C, D & E)
50,410	SF	2.07	ACRES	CREATE 4 LOTS NORTH OF SEYMOUR ST. (E)

08/23/2024



Property Division Map and Phasing Plan

Source: AXIS/GFA Architecture + Design, 2024



*graphic may not be to scale

Source: AXIS/GTA Architecture + Design, 2024

Proposed Floor Plans – First Floor

Figure

5-5

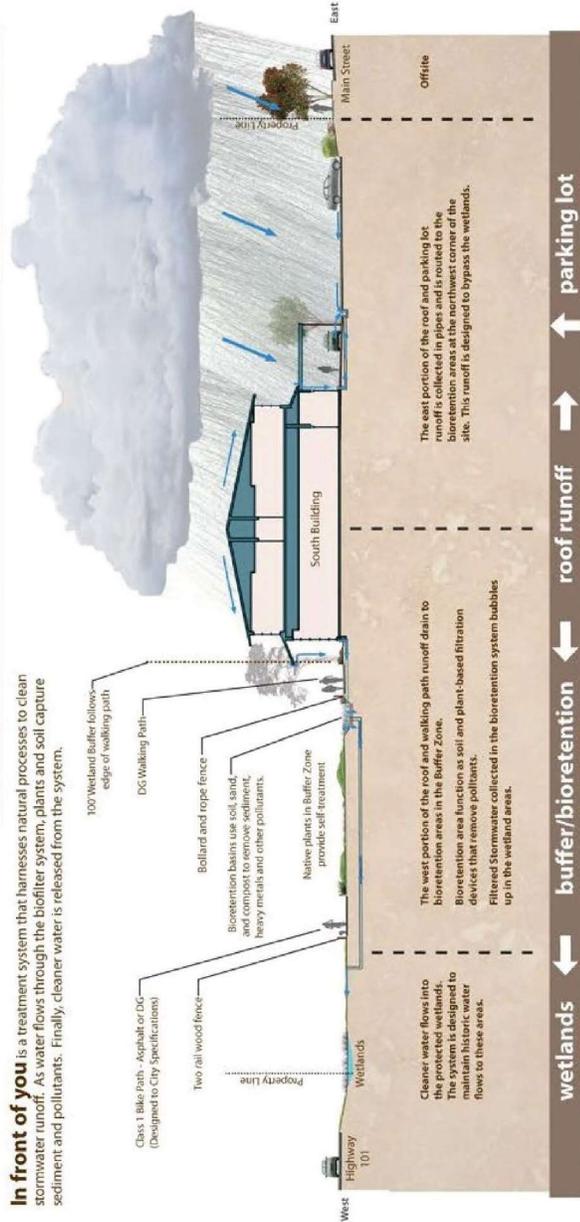
Hyatt Place Half Moon Bay Project

Cleaning Stormwater to Protect Wetlands Hyatt Place Half Moon Bay



Drainage System

In front of you is a treatment system that harnesses natural processes to clean stormwater runoff. As water flows through the biofilter system, plants and soil capture sediment and pollutants. Finally, cleaner water is released from the system.



wetlands ← buffer/bioretention ← roof runoff → parking lot

A Biofilter System protecting Wetlands adjacent to the new South Gateway in Half Moon Bay

The project is designed to harness natural processes to treat stormwater runoff while promoting habitats that encourage pollination and wildlife habitat. The system uses plants, soils, and filter media to capture sediment and pollutants before releasing cleaner water from the system. The bioretention areas and buffer zone also serve as an educational tool for students, the community and visitors to the area as the surrounding ADA-compliant paths are lined with educational signage and benches where visitors can observe the preserved wetlands and the restored native vegetation introduced in the buffer zone areas. This area provides two acres of open space enhancing the South Gateway for the City.

Drainage System

5-7

Source: MWS Consulting, 2024

Ability to Accomplish Project Objectives

Modified Alternative 2 would meet the same objectives met by the project. In some cases, Modified Alternative 2 would achieve the City's primary project objectives to a greater degree than the project described in **Chapter 3.0, Project Description**. These objectives are discussed in further detail below.

The overall size of the hotel buildings would be reduced under Modified Alternative 2 (from 90,784 square feet to 66,268 square feet). Forty percent of the project site would be dedicated to open space under Modified Alternative 2, which is more open space than what was proposed as part of the project. Dedicated open space would include bioretention areas to function as a soil and plant-based filtration to naturally process stormwater runoff. This area would also host native plants and grasses. This dedicated open space and natural landscaping would support the City's and project applicant's objective of providing a development that is aesthetically pleasing by balancing the urban landscape with natural elements of the coast.

The southern entrance to Downtown, located at the intersection of SR-1 and Higgins Canyon Road at the southern tip of the project site, is a gateway which helps define the character of the city. As such, it is important that development at the project site be designed as contextually appropriate for the city and provide compatibility with both the Downtown and the adjacent residential neighborhood. Modified Alternative 2 would reduce the size and scale of the hotel proposed as part of the project, reducing significant impacts to aesthetic resources, as compared to the project. The reduced building massing would be more reflective of traditional development and scale within the city and would help to maintain adequate views of the surrounding landscape. The reduced massing combined with the increased setbacks, open space and natural landscaping proposed under Modified Alternative 2 would enhance the aesthetic of the Southern gateway of the city.

Given the above, Modified Alternative 2 would support the City's and project applicant's primary project objectives for aesthetic resources and design to a greater degree than the project.

Environmental Impacts

Aesthetics

Modified Alternative 2 would reduce the overall massing of the project as well as increase building setbacks from SR-1 and Main Street, which would reduce the aesthetic impacts associated with the project. As discussed in **Section 5.5.2, Reduced Intensity, Modified Alternative 2**, the hotel, as proposed under Modified Alternative 2, would consist of two main buildings, a

north building and a south building, and a parking lot that faces Main Street. A third one-story building is proposed on the east side of the north building that would house a bicycle rental shop. The north building would be a three-story structure consisting of guestrooms and employee areas and the south building would be a two-story structure consisting of the lobby and public space, with guestrooms on the second level. Many of the facilities proposed as part of the project, such as the pool/fitness center, lobby/reception building, and conference center, have been eliminated in Modified Alternative 2 in order to reduce the overall project footprint.

The proposed massing of structures under Modified Alternative 2 is reduced, spanning a length of 466 feet, or approximately 50 percent of the project site. This would maintain the visual balance of structures and open space. The overall floor area would also be reduced under Modified Alternative 2 (from 90,784 square feet to 66,268 square feet). As with the project, Modified Alternative 2 would comply with **Standard Condition AES-1** and **Mitigation Measure AES-1**, which would minimize light and glare associated with the construction and operation of Modified Alternative 2.

For the purposes of analyzing aesthetic impacts associated with Modified Alternative 2, the same viewpoints identified in **Section 4.1, Aesthetics**, were utilized.

Figure 5-8 through **Figure 5-11** depict the general massing associated with Modified Alternative 2. **Figure 5-8** depicts public views of the project site from Viewpoint 1 at the residential developments located northeast of the project site. **Figure 5-9** depicts the project site from Viewpoint 2, which is on SR-1 south of Higgins Canyon Road. **Figure 5-10** depicts the project site from Viewpoint 3 on SR-1, just north of Viewpoint 2. **Figure 5-11** depicts the project site from Viewpoint 4, at the bicycle path associated with the Naomi Patridge Trail. Viewpoint 1 and Viewpoint 4 were included in the Draft EIR analysis in response to public interest and would not interfere with protected views as defined by LCLUP policy 9-12 (Town Boulevard Scenic Corridor). Viewpoints 1 and 4; however, are applicable to the analysis of aesthetic impacts pursuant to CEQA because of the potential for degradation of existing visual character or quality of the site and its surroundings. As described below, revised figures have been submitted showing that Modified Alternative 2 would reduce view blockage compared to the project.

The view from Main Street across SR-1 to Wavecrest (Viewpoint 1) provides a view of an open agricultural field, and not the coastal views available from the western side of Wavecrest. Implementation of Modified Alternative 2 would generally block views of the open field on the eastern side of Wavecrest from Main Street as depicted in **Figure 5-8**. However, given the

reduced massing, Modified Alternative 2 would not block as much of this view as the project. Additionally, this viewpoint was selected in response to public interest and is not a protected view or considered a sensitive view or vista, nor does it contain scenic resources within a state scenic highway.

The view from the southern Downtown gateway intersection of SR-1 and Higgins Canyon Road (Viewpoint 2) provides a view of an open field, and of the protected ridgeline view. The ridgeline represents both a scenic vista and a scenic resource, per the LCLUP. As shown in **Figure 5-9**, Modified Alternative 2 would not interfere with the long-range views of the ridgeline for Viewpoint 2 (same as the project).

Modified Alternative 2 would reduce the size and scale of the hotel proposed as part of the project, reducing significant impacts to aesthetic resources, as compared to the project. The reduced building massing would be more reflective of traditional development and scale within the city and would help to maintain adequate views of the surrounding landscape. Furthermore, given the speed of vehicles traveling on SR-1, any interference into the ridgeline views would be fleeting. Therefore, Modified Alternative 2 will not introduce interferences with the ridgeline view. In addition, the reduced massing combined with the increased setbacks, open space, and natural landscaping proposed under Modified Alternative 2 would enhance the aesthetic of the City's southern Downtown gateway.

The project, as analyzed in **Section 4.1, Aesthetics**, of the Draft EIR, would interfere with the long-range views of the ridgelines north and east of the project site from SR-1 (Viewpoint 3). As discussed in **Section 5.3.2, Significant and Unavoidable Impacts**, the project was found to have a substantial adverse effect on the ridgeline, which is a scenic vista and a scenic resource within a scenic corridor and would substantially degrade visual quality of public views. These impacts were found to be significant and unavoidable for the project. However, Modified Alternative 2 would reduce the overall massing of the structures at the project site, improving available views from surrounding viewpoints, including those available from SR-1, as compared to the project (see **Figure 5-10**). Although this section of SR-1 is not officially designated as a scenic highway, the City considers it as a visual resource area subject to regulations applicable to a scenic corridor pursuant to LCLUP policy 9-12. Under Modified Alternative 2, 40 percent of the project site would be dedicated to open space, which is more than what was proposed for the project. Building setbacks from the southern gateway, Main Street, and SR-1 would each be substantially increased under Modified Alternative 2. Given the above and as demonstrated in **Figure 5-10**, Modified Alternative 2 would have a less-than-significant impact to protected scenic vistas and scenic resources within a scenic corridor that are available from

Viewpoint 3, unlike the project, which would have a significant and unavoidable impact at this viewpoint.

While long-range views of the ridgeline would still be available from SR-1 and most other viewsheds surrounding the project site, **Figure 5-11** depicts the obscured views from Viewpoint 4. Because the north building would be constructed at an angle on the project site, the view of the ridgeline from Viewpoint 4 would still be obstructed. Viewpoint 4 is not a protected view according to the City's LCLUP; however, it was evaluated due to community interest.

As described above, Modified Alternative 2 would have a less-than-significant impact to protected scenic vistas and scenic resources within a scenic corridor where the project would have a significant and unavoidable impact to both thresholds. While Modified Alternative 2 would reduce impacts to scenic vistas and scenic resources, build out of Modified Alternative 2 would result in permanent changes in the existing visual quality of the project site. Although the project would incorporate high quality design elements, landscaping, and screening techniques, the visual quality of the project site from public views is conservatively considered to be adversely affected by the project. Therefore, Modified Alternative 2 would substantially degrade the existing visual quality of the project site from public views and this impact would be significant and unavoidable, consistent with the project.

In summary, Viewpoints 2 and 3 pertain to LCLUP policy impacts from the Town Boulevard toward ridgeline views and are also CEQA impacts. Viewpoints 1 and 4 pertain to the CEQA impact of degrading the existing visual character or quality of the site and its surroundings. The following table presents a summary comparison of the project and Modified Alternative 2 for the above analysis.

Viewpoint	Impact Type associated with each Viewpoint	Impact	
		Original Project Analyzed in Draft EIR	Modified Alternative 2
Viewpoint 1: Main Street looking west	Existing visual character or quality of the site and its surroundings	Yes	Yes, but less than project
Viewpoint 2: SR-1 south of Higgins Canyon Road looking north	<ul style="list-style-type: none"> • Town Boulevard • Ridgeline Views 	No	No
Viewpoint 3: SR-1 north of Higgins Canyon Road looking north	<ul style="list-style-type: none"> • Town Boulevard • Ridgeline Views 	Yes	No
Viewpoint 4: Naomi Patridge Trail looking east	Existing visual character or quality of the site and its surroundings	Yes	Yes, but less than project

Hyatt Place Half Moon Bay Project



Reduced Intensity, Alternative 2 – Viewpoint 1

Figure

5-8

Source: FastCast, 2024

Hyatt Place Half Moon Bay Project



Reduced Intensity, Alternative 2 – Viewpoint 2

Figure

5-9

Source: FastCast, 2024

Hyatt Place Half Moon Bay Project



Reduced Intensity, Alternative 2 – Viewpoint 3

Figure

5-10

Source: FastCast, 2024

Hyatt Place Half Moon Bay Project



Reduced Intensity, Alternative 2 – Viewpoint 4

Figure

5-11

Source: FastCast, 2024

Agricultural Resources

Modified Alternative 2 and the project would both result in the loss of approximately 3 acres of prime agricultural soils. As required by LCLUP Policy 4-10, the applicant has submitted an agricultural land value analysis of the portion of the site that would be converted to development by Modified Alternative 2. The applicant proposes to pay in-lieu fees equaling this value for the City to hold and convey to an appropriate agency or landowner where the funds must be used for agricultural conservation easements, soil restoration, or other similar means of preserving agricultural uses and prime soils in the San Mateo County coastal zone.

Air Quality

Modified Alternative 2 would result in slightly higher construction period emissions than the project because of additional construction activity required for the new residential site. However, construction emissions for Modified Alternative 2 would not exceed the Bay Area Air Quality Management District (BAAQMD)'s significance thresholds for construction criteria pollutants. Operational emissions for Modified Alternative 2 would be similar to or slightly greater than those of the project. Annual and average daily emissions remain well below the thresholds used to judge the significance of these emissions. Modified Alternative 2 would also require approximately three percent less energy usage than the project.

PM₁₀ exhaust emissions, which are assumed to be mostly diesel particulate matter (the toxic air contaminant (TAC) emitted by construction equipment) would be slightly higher for Modified Alternative 2 as compared with the project – approximately 10 percent higher.² Modified Alternative 2 would have slightly higher emissions than the project, but lower emissions than reported for the project in the 2020 assessment. However, these emissions would occur mostly further away from the closest sensitive receptor affected by construction. The construction area would include a parcel that is about 22 percent of the project size that is in a completely different area. Emissions from the project site would decrease because the project would be smaller in size. Health risk impacts are primarily dependent on the magnitude of TAC emissions and proximity of those emissions with respect to the sensitive receptors, when considering wind flow. When considering these effects,

² To note, updated emissions modeling for the project are lower due to the new CalEEMod model which incorporates newer motor vehicle emission rates reflective of the State's Emission Factors model, updated building energy consumption rates based on 2019 State Buildings Codes, and newer GHG intensity rates for electricity generated by Peninsula Clean Energy (the default electricity provider).

health risk impacts with the Modified Alternative 2 would be similar to those identified previously for the project. **Standard Condition AQ-1** and **Mitigation Measure AQ-2** would be adequate to reduce the impact to a less-than-significant level similar to the project.

Biological Resources

The biological resources study area for Modified Alternative 2 is generally the same as the study area for the project; however, an additional 1.88 acres were studied to include analysis of the wetlands beyond the parcel north of Seymour Street. The increased study area includes the 1.15-acre parcel north of Seymour Street, and portions of the adjacent parcels. Biological resource impacts for Modified Alternative 2 are generally the same as those for the project. A biological site visit occurred on June 10, 2021, to survey the new study area and confirm that existing conditions on the original study area had not changed.

As with the project, impacts to special-status plant species are not expected to occur as a result of Modified Alternative 2. Additionally, impacts to special-status wildlife species are not expected to occur as a result of Modified Alternative 2 with implementation of Mitigation Measures **BIO-1a**, **BIO-1b**, **BIO-1c**, **BIO-1d**, **BIO-1e**, **BIO-1f**, and **BIO-1g** as outlined in **Section 4.4, Biological Resources**. The aforementioned mitigation measures would be adequate to reduce the impact to a less-than-significant level, similar to the project.

As described in Chapter 6 of the LCLUP and Section 18.38.080 of the City's zoning ordinance, most permanent structures are required to be placed outside of a 100-foot buffer from jurisdictional wetlands. Four seasonal wetland features are located on the western boundary of the original study area. The hotel structures proposed as part of Modified Alternative 2 would be constructed outside of the 100-foot wetland buffer. Two seasonal wetland features, which were determined to meet the USACE three-parameter criteria for wetlands under Section 404 of the Clean Water Act, were identified along the western boundary of the new study area. The existing features (i.e., roadway, residential housing, and parking lot) that are currently within 100 feet of these newly documented wetlands can be grandfathered in and would be allowed to remain in their existing conditions.

Modified Alternative 2 includes a parcel map for residential development north of Seymour Street. The proposed parcel map and future residential development included in Modified Alternative 2 would need to be consistent with Policy 6-57 Land Divisions of the 2020 LCLUP. This policy requires that each new parcel created can be developed without building in ESHA or ESHA buffers. In this case, LCLUP Policy 6-41 (Wetland Buffer Zones), part

b allows for a 50-foot buffer where the only building site is not located entirely within a required buffer; there are no feasible alternatives to accommodate the development entirely outside the otherwise required buffer (e.g. 100 feet); and no new adverse impact to the wetland will occur as demonstrated by a professional biologist.

In this case, the wetlands are located within Caltrans right-of-way west of the parcel map boundary. With respect to feasibility, as proposed, the parcel map results in lots that can be developed in conformance with the Zoning Ordinance density requirements for the R-2 district, which specify a minimum density of 10 units/acre and a maximum density of 17.42 units/acre. Densities for each new lot are anticipated to range from 10.3 to 17.3 units per acre.

A memorandum prepared by the City-approved biologist confirms that the 50-foot buffer included in Modified Alternative 2 will not adversely impact these wetland features, because the parcels are not within the 50-foot buffer.³ Also notable is that the existing condition is an asphalt parking lot covering most of the buffer area. Putting a 50-foot buffer into a conservation easement will improve the existing condition in alignment with LCLUP policies for the projection of biological resource areas, including wetlands. The impact on the offsite wetlands of this parcel map and its eventual residential development could be significant unless mitigated. The following mitigation measures would reduce potential project impacts on these wetlands to a less-than-significant level:

- **Mitigation Measure BIO-4a:** Prior to development of the westernmost parcel created by approval of the parcel map, a deed restriction shall be recorded to ensure the 50-foot ESHA buffer is protected in a conservation easement so as to be consistent with Policy 6-57 Land Divisions of the 2020 LCLUP. Development within the buffer shall be limited to uses identified in Policies 6-40 and 6-42 of the LCLUP, which can include stormwater retention provided that such a system is designed as part of a conservation plan.
- **Mitigation Measure BIO-4b:** Residential development of the subdivided 1.15-acre site north of Seymour Street shall comply with all applicable wetland buffer requirements, specifically the 50-foot wetland buffer allowed by LCLUP Policy 6-41, part b. Furthermore, site development shall not result in direct or indirect water quality impacts that could occur due to adjacent development. During construction, suitable erosion control, sediment control, source control, treatment control, material

³ Sol Ecology, October 19, 2023, letter to City of Half Moon Bay, "Hyatt Place Project, (File No. PDP 072-13) – Conservation easement for the 1.15-acre Property North of Seymour Street."

management, and stormwater management measures would be used in conformance with the NPDES Statewide Construction General Permit (Order No. 2009-0009-DWQ). Additionally, the project will be designed to comply with the California Regional Water Quality Control Board, San Francisco Bay Region, Municipal Regional Stormwater NPDES Permit (MRP) (Water Board Order No. R2-2009-0074). This will require that the project implement BMPs into the design that prevents stormwater runoff pollution, promotes infiltration, and holds/slows down the volume of water coming from a site. In order to meet these permit and policy requirements, projects must incorporate the use of tree planters, grassy swales, bioretention and/or detention basins, among other factors. The site is already largely designed to preserve existing drainage characteristics, as seen by the placement of stormwater treatment basins near the area of the site where the seasonal wetlands occur. These basins shall be designed to drain to the avoided wetland area to preserve hydrological inputs from the site.

Implementation of **Mitigation Measures BIO-4a and BIO-4b** would be adequate to reduce the impact to a less-than-significant level. Additionally, with adherence to the aforementioned mitigation measures, Modified Alternative 2 would not conflict with applicable plan, policy or regulations adopted for the purpose of wetland protections, and this impact would be less than significant with mitigation, similar to the project.

Greenhouse Gas

Modified Alternative 2 would have slightly higher GHG emissions than the project. GHG emissions generated during project construction would be similar to, or slightly higher than, the project. The residential units proposed as a part of Modified Alternative 2 would result in relatively increased long-term emissions associated with vehicle emissions and solid waste generation. However, Modified Alternative 2 would generate 585 Metric Tons (MT) of carbon dioxide equivalent (CO₂e) emissions annually, which is well below BAAQMD's threshold of 660 MT of CO₂e. Therefore, Modified Alternative 2 would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs and this impact would be less than significant, similar to the project.

Land Use and Planning

Modified Alternative 2 would not have the potential to physically divide an established community. Rather, this alternative would allow for future development of up to 16 dwelling units along Seymour Street with associated street frontage improvements. The project site for Modified Alternative 2 was

expanded to include a 1.15-acre parcel north of Seymour Street along SR-1, used by the auto dealership for extra parking. As discussed in **Section 5.5.2, Reduced Intensity, Modified Alternative 2**, Modified Alternative 2 would require a lot line adjustment on the 5.02-acre parcel, adding 0.45 acres to the dealership and using the remaining 4.57 acres for the hotel and Open Space. Adding 0.45 acres to the dealership allows for the creation of a 4-lot subdivision on the north side of Seymour Street on the 1.15-acre parcel owned by the project applicant, for future residential development. These parcels are designated as residential – medium density in the LCLUP, and the site is zoned for residential development in the R-2 (Two family Residential) Zoning District. The existing use at the 1.15-acre parcel, as overflow parking for the dealership, is in conflict with the parcel's land use and zoning. However, residential development under Modified Alternative 2 would be consistent with the parcel's land use designation and zoning.

Neither implementation of the project nor Modified Alternative 2 would result in any inconsistencies with the Half Moon Bay General Plan or Zoning Code, as the zoning is consistent with current zoning designations. Based on the above, both the project and Modified Alternative 2 would have less-than-significant impacts related to land use, similar to the project.

With respect to General Plan/LCLUP policy consistency, Modified Alternative 2 adequately addresses LCLUP Policy 5-71 (Inclusion of Lower-Cost Accommodations). As required by this policy, the applicant has submitted with the Planning Application a proposal for how this policy will be implemented through a combination of the provision of some lower-cost rooms and no-cost on-site visitor-serving amenities.

Noise and Vibration

Construction of Modified Alternative 2 would result in temporary noise increases that could exceed local standards. Under Modified Alternative 2, the hotel includes an outdoor patio along the southern façade of the building. The future exterior noise levels would be below 65 decibels (dBA) at the center of the outdoor patio.

The western façade of the proposed hotel would be located between 160 and 205 feet from the centerline of SR-1. The hotel rooms along this building façade would be exposed to future exterior noise levels up to 66 dBA. The rooms located on the eastern façade would be set back approximately 100 to 160 feet from the centerline of Main Street. At these distances, noise from SR-1 would attenuate such that exterior noise levels along the eastern façade would be at or below 60 dBA. By providing a suitable form of forced-air mechanical ventilation, as determined by the local building official, the interior noise levels would be reduced. For hotel rooms facing Cabrillo Highway

Sound Transmission Class (STC) rated windows and doors would be required in addition to forced-air mechanical ventilation. Additionally, for exterior-facing units facing Main Street and the fire station, windows and doors would also need to be fitted with a minimum STC rating of 30 to 31, in addition to forced-air mechanical ventilation to meet interior noise thresholds.

The potential residential development located north of Seymour Street would also have backyards subject to exterior noise criteria. While the residential structures would provide adequate shielding from Seymour Street and the existing buildings to the east would provide adequate shielding from traffic along Main Street, these backyards would be exposed to traffic noise from Cabrillo Highway. The centers of the backyards would be set back approximately 125 to 400 feet from the centerline of the highway. With partial shielding from the row of existing residences to the north, the backyards of the residential lots would be exposed to future exterior noise levels ranging from 54 to 67 dBA.

The future noise environment would exceed the exterior noise criteria by up to 7 dBA at the nearest residential structure adjoining Cabrillo Highway. To meet the exterior noise threshold, additional noise control measures would be implemented.

Methods available to reduce exterior noise levels in the backyards would be limited due to the small parcel of land available. The optimal measure for noise reduction would be to construct a sound wall or a specially-designed barrier fence capable of reducing noise levels by at least 7 dBA.

With the implementation of an 8-foot-tall barrier, the exterior noise environment would be at or below 60 dBA. The City could, however, approve a 6-foot barrier to achieve an exterior noise environment at the residential backyards of 65 dBA CNEL under a conditionally acceptable condition. Furthermore, consistent with the City's approval of residential development of other lots adjacent to Cabrillo Highway, the entire yard area would not need to conform to the 60 dBA threshold provided that a sound protected outdoor space can be established on each site. For residential uses or duplexes, an exterior noise threshold of 60 dBA CNEL is the standard, according to Exhibit 13 of the General Plan.

For interior noise levels, the units located along Cabrillo Highway would require windows and doors with a minimum STC rating of 35 to 36 and an adequate form of forced-air mechanical ventilation to meet the 40 dBA threshold. Units located within 200 feet of the centerline of Cabrillo Highway would require minimum STC ratings of 31 and a form of forced-air mechanical ventilation to adhere to the City's 40 dBA CNEL interior threshold standards, as noted in Exhibit 13 of the City's General Plan (Action 6), which

provides the 40 dBA CNEL interior thresholds for residential duplex units and hotel room interiors. All other units would require standard construction materials with adequate forced-air mechanical ventilation. It should be noted however, that the wetland buffer requirements will result in increased distance between the westernmost units and the roadway. Thus, these requirements for soundproofing such units will be more than adequate to attenuate highway noise to acceptable levels.

In addition to the aforementioned measure, a qualified acoustical specialist shall prepare a detailed analysis of interior hotel noise levels resulting from all exterior sources during the design phase pursuant to requirements set forth in the State Building Code. Treatments would include, but are not limited to, sound-rated windows and doors, sound-rated wall and window constructions, acoustical caulking, protected ventilation openings, etc. The specific determination of what noise insulation treatments are necessary shall be conducted on a room-by-room basis in the hotel or a unit-by-unit basis in the residential units during final design of the project. Results of the analysis, including the description of the necessary noise control treatments, shall be submitted to the City, along with the building plans and approved design, prior to issuance of a building permit. The implementation of these noise insulation features would reduce interior noise levels to 45 dBA or less and 55 dBA L_{max} or less.

Construction activities for the reduced hotel for Modified Alternative 2 is expected to be similar to the project, which was estimated to last about 18 months. The same phasing information and equipment used in each phase is not expected to change under project alternative conditions. Therefore, with the implementation of *Construction Best Management Practices*, included in **Mitigation Measure NOI-1a**, the temporary construction would be reduced to a less-than-significant level similar to the project.

The residential units located north of Seymour Street, however, would generate temporary construction noise near existing residential land uses. Construction activities generate considerable amounts of noise, especially during earth-moving activities when heavy equipment is used. The highest maximum noise levels generated by the construction of these residential units would typically range from about 80 to 90 dBA L_{max} at a distance of 50 feet from the noise source, and typical hourly average noise levels for residential land uses would range from 65 to 88 dBA L_{eq} , as measured at a distance of 50 feet from the center of the site during busy construction periods (e.g., earth moving equipment, impact tools, etc.). Therefore, under Modified Alternative 2, **Mitigation Measure NOI-1a** would also be applicable, and would reduce temporary construction noise impacts to a less-than-significant level at all noise-sensitive receptors surrounding the project site.

Transportation and Traffic

Similar to the project, Modified Alternative 2 would be consistent with all programs, plans, and ordinances which address the circulation system in Half Moon Bay. Modified Alternative 2 includes a building dedicated to bicycle rentals as well as bicycle and pedestrian pathways throughout the project site.

Trip generation, or the amount of traffic predicted to enter and exit the project site, is anticipated to be decreased under Modified Alternative 2. The hotel component and residential component proposed as part of Modified Alternative 2 are anticipated to generate an average of 572 trips per day, including 42 trips during the a.m. peak hour, 46 during the p.m. peak hour and 84 during the weekend peak hour. This represents a decrease of three daily trips, two fewer trips during the a.m. peak hour, no change to the number of trips during the p.m. peak hour and a decrease of nine trips during the weekend peak hour compared to the project. Of the average 572 daily trips, 48 percent of trips would be to or from north of the project view SR-1; 40 percent of trips would be to or from East of the project site from SR-92; and 12 percent of trips would be to or from South of the project site from SR-1.

As discussed in **Section 4.15, Transportation and Traffic**, Senate Bill (SB) 743 established the increase in Vehicle Miles Traveled (VMT) as a result of a project as the basis for determining transportation impacts. As of the date of this analysis, the City of Half Moon Bay has not yet established thresholds of significance related to VMT. As a result, the project related VMT impacts were assessed based on guidance provided by the California Governor's Office of Planning and Research (OPR) in the publication *Transportation Impacts (SB 743) CEQA Guidelines Update and Technical Advisory*, 2018. This document states that each component of a mixed-use project can be evaluated independently with separate significance thresholds applied for each component.

Residential VMT. For the purposes of the traffic analysis, the regional area comprises the coastal region, as defined by the *Connect the Coastsides Comprehensive Transportation Management Plan*, dated October 2021. Based on data from the Local Coastal Plan version of the C/CAG travel demand model, the Connect the Coastsides study area has a baseline average residential VMT of 24.12 miles per capita. Applying OPR's guidance, a residential project generating a VMT that is 15 percent or more below this value, or 20.50 miles per capita or less, would have a less-than-significant VMT impact.

The unadjusted VMT for the residential project is 19.63 miles. However, Modified Alternative 2 is eligible for VMT adjustments based on the site density. A reduction of 11.6 percent can be applied to the VMT based on the addition of 16 dwelling units on a 1.15-acre parcel. The 11.6 percent reduction in project VMT would result in a value of 17.35 miles per capita, which is less than the VMT significance threshold of 20.50 miles per capita.⁴ Therefore, the residential portion of the Modified Alternative 2 would be expected to result in a less than-significant VMT impact.

Commercial VMT. The OPR Technical Advisory includes suggested VMT significance thresholds for residential, employment, and retail uses but does not address hotel or other visitor-based land uses. Consistent with **Section 4.15, Transportation and Traffic**, the City of Half Moon Bay Staff has determined that a project that generates 15 (or more) percent less than the unmitigated project VMT, with the implementation of Transportation Demand Management (TDM) measures, would indicate a less-than-significant VMT impact.

VMT associated with the hotel component under Modified Alternative 2 is substantially reduced as compared to the project. The unmitigated project condition for the hotel component was estimated by separating the total number of daily trips into three trip categories: employee trips, guest trips to/from the airport and local guest trips. These three trip categories were anticipated to generate 3,965 daily VMT assuming peak room occupancy. The suite of TDM measures described in **Section 4.15, Transportation and Traffic**, provided the framework for reducing both guest and employee vehicle trips and VMT. The expected VMT reductions associated with the various TDM measures were estimated to reduce VMT to 3,354 daily VMT, a 15.4 percent reduction.

Therefore, under Modified Alternative 2, **Mitigation Measure TRA-1** would also be applicable, and would reduce project VMT to at least 15%, resulting in a less-than-significant VMT impact.

⁴ The VMT adjustments applied are contingent on the number of dwelling units proposed as part of the project. The analysis assumes 16 dwelling units would be accommodated on Lots 1-4. However, the unadjusted residential VMT would still be below the VMT significance threshold of 20.50.

5.5.3 MULTI-FAMILY RESIDENTIAL, ALTERNATIVE 3

The Multi-family Residential Alternative, Alternative 3, would involve the construction of residential units at the project site rather than a hotel. Alternative 3 consists of 2 main buildings, a 2-story structure and a 3-story structure with 58 Multifamily Units, which would encompass a building floor area of approximately 66,581 square feet (**Figure 5-12**). Alternative 3 also includes a parking lot on the east side of the project site with 116 parking spaces, 50 percent of which would be enclosed within a garage/carport. The auto dealership would be extended south, and housing would be proposed on the north side of Seymour Street, similar to Modified Alternative 2. The layout for Alternative 3 was designed to obtain the most efficient parking and is based on a substantially similar layout and building floor area as the hotel in Modified Alternative 2, including the structure locations.

Under Alternative 3, the multi-family residential buildings would be approximately the same size and height as the hotel buildings proposed in Modified Alternative 2. The structures associated with Alternative 3 would comprise 66,581 square feet of the project site (not including carports or garages) while the project and Modified Alternative 2 would comprise 90,784 square feet and 66,268 square feet, respectively. Alternative 3 would feature the same amount of open space as Modified Alternative 2.

Hyatt Place Half Moon Bay Project

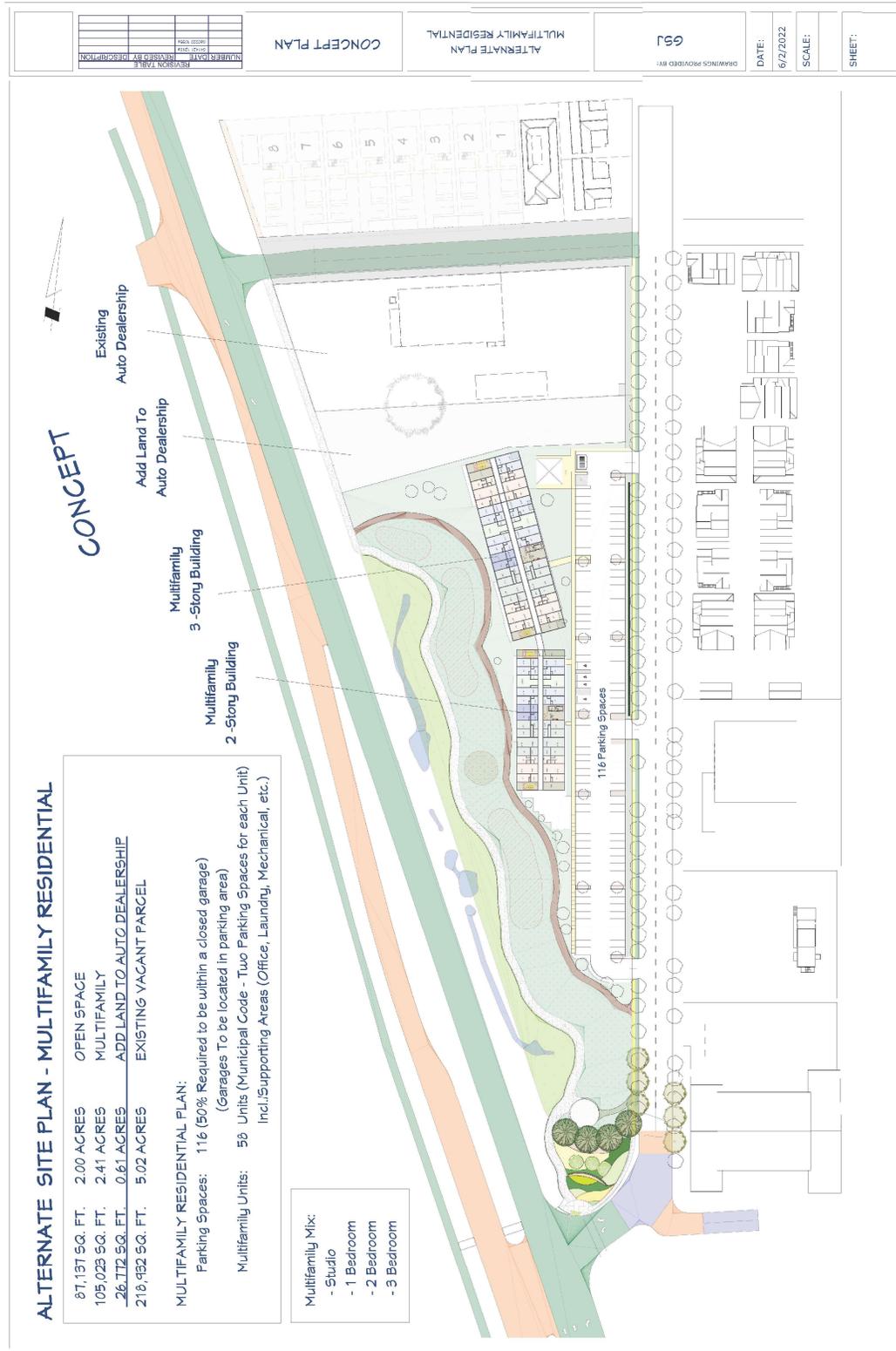


Figure 5-12

Multi-Family Residential, Alternative 3 – Site Layout

Source: AXIS/GFA Architecture + Design

Ability to Accomplish Project Objectives

Alternative 3 would not meet several of the City's and project applicant's project objectives, which are generally framed to support the City's growing local tourist and agribusiness economies. It is noted that while housing, and specifically affordable housing, are City priorities, this particular site has been held in a commercial land use designation for many years through the previous L.C. Smith Estate Planned Development designation and associated PUD (Planned Unit Development) zoning. The updated LCLUP brought the intention of the former Planned Development designation forward with a redesignation to the Commercial-General Land Use Designation. While that designation allows for residential and/or mixed-use development, the site's location and orientation serve as the southern commercial gateway to Downtown Half Moon Bay. The City also recently lost a hotel when the 52-room Coastside Inn was purchased by San Mateo County and converted to a homeless shelter; and thus, the continued land use focus for this property has been to maintain adequate visitor serving commercial uses consistent with the California Coastal Act. The Act includes provisions for accommodations geared towards visitors and recreation benefits such as bicycle rentals, which would not be achieved under Alternative 3. As a residential project, while Alternative 3 would provide multi-family residential units, it would not help meet the city's demand for more hotel rooms, support the City's economic development goals, support the local job market by providing new employment opportunities, or provide an opportunity for the City to maintain revenue stream.

The overall floor area and building footprint for Alternative 3 would be less than the project and similar to Modified Alternative 2. Because Alternative 3 would have the same general massing as Modified Alternative 2, the structures would be generally reflective of traditional development and scale within the city and would help to maintain adequate views of the surrounding landscape. Alternative 3 would also have the same amount of open space as Modified Alternative 2.

The design of Alternative 3 was not developed to the extent that it was for the project or Modified Alternative 2. However, it assumed that Alternative 3 would be designed in compliance with the City's standards and policies to be visually compatible with the character of the surrounding areas.

Environmental Impacts

Aesthetics

As discussed above, Alternative 3 would have a similar building footprint as compared to Modified Alternative 2. The structures associated with Alternative 3 would comprise 66,581 square feet of the project site while the structures associated with the project and Modified Alternative 2 would comprise 90,784 square feet and 66,268 square feet, respectively. Alternative 3 would have 2 main buildings, a north building and a south building, similar to Modified Alternative 2. The north building would be 3 stories in height while the south building would be 2 stories. Alternative 3 would also have the same amount of open space as Modified Alternative 2 (2 acres). 40 percent of the project site would be dedicated to open space under Alternative 3, which is more open space than what was proposed as part of the project. Alternative 3 would also have one-story carport or garage structures located within the parking lot area. These structures would have limited visibility from SR-1.

For the purposes of analyzing aesthetic impacts associated with Alternative 3, the same viewpoints identified in **Section 4.1, Aesthetics**, were utilized. Viewpoint 1 and Viewpoint 4 were included in response to public interest and would not interfere with protected views. Similar to Modified Alternative 2, Alternative 3 would not interfere with protected long-range views associated with Viewpoints 2 or 3.

The project, as analyzed in **Section 4.1, Aesthetics**, of the Draft EIR, would interfere with the long-range views of the ridgelines north and east of the project site from SR-1 at Viewpoint 3 resulting in a significant and unavoidable impact. Both the project and Modified Alternative 2 were found to have a significant unavoidable impact on the existing visual character or quality of the site and its surroundings. Alternative 3 is substantially similar to Modified Alternative 2 with respect to site size and massing. Therefore, it is anticipated that Alternative 3 would not impact long-range views compared to the project, but that it will have a significant and unavoidable impact on the existing visual character or quality of the site and its surroundings, similar to Modified Alternative 2.

Agricultural Resources

Similar to the project and Modified Alternative 2, Alternative 3 would result in the loss of approximately 3 acres of prime agricultural soils. The applicant has submitted an agricultural land value analysis of the portion of the site for Modified Alternative 2 that will be converted to development. If Alternative 3 is to be approved and implemented, a similar approach to addressing the loss of agricultural lands would be required.

Air Quality

Alternative 3 is anticipated to result in a similar or less emissions as Modified Alternative 2 and more emissions than the project. Alternative 3 involves the construction of 58 residential units, and a subdivision for 8-units on the north side of Seymour Street on the 1.15-acre parcel owned by the project applicant. The project and Modified Alternative 2 involve construction of 129 guest rooms and 102 guest rooms, respectively. Both Modified Alternative 2 and Alternative 3 would include construction of two similarly sized buildings at the project site. While construction emissions were not calculated for Alternative 3, it is anticipated that construction emissions for Alternative 3 would not exceed the Bay Area Air Quality Management District (BAAQMD)'s significance thresholds for construction criteria pollutants based on the review of similar residential projects. Similarly, operational emissions for Alternative 3 are anticipated to be similar or less to those of the project and Modified Alternative 2, which would be well below the thresholds used to judge the significance of these emissions.

Biological Resources

Biological resource impacts for Alternative 3 are generally the same as those for the project, with the exception of the added 1.15-acre area north of Seymour Street, which is also proposed as part of Modified Alternative 2. Modified Alternative 2 and Alternative 3 would likely have similar biological resource impacts as both alternatives propose the construction of 2 buildings at the project site, and both include a subdivision for residential units on the parcel north of Seymour Street, although differences in the proposed subdivision design are pertinent to this discussion as explained below. Mitigation Measures **BIO-1a**, **BIO-1b**, **BIO-1c**, **BIO-1d**, **BIO-1e**, **BIO-1f**, and **BIO-1g** as outlined in **Section 4.4, Biological Resources** can be assumed to reduce impacts to a less-than-significant level.

As described in **Section 5.5.2, Reduced Intensity, Modified Alternative 2**, four seasonal wetland features are located on the western boundary of the original study area and two seasonal wetland features, are located along the western boundary of the parcel north of Seymour Street. For this analysis, it is assumed that as in Modified Alternative 2, Alternative 3 would qualify for a reduced wetland buffer, 50 feet instead of 100 feet, per LCLUP Policy 6-41, part b. As proposed in Alternative 3, the 8-lot subdivision would result in a new parcel and would be located fully within the 50-foot buffer for wetlands which is inconsistent with Policy 6-57 Land Divisions of the 2020 LCLUP. This impact would be significant unless mitigated. Mitigation Measures **BIO-4a**, **BIO-4b** (described in **Section 5.5.2, Reduced Intensity, Modified Alternative 2**) would reduce potential wetland impacts related to the

residential units proposed on the parcel north of Seymour Street in addition to Mitigation Measure BIO-4c, below.

Mitigation Measure BIO-4c: The subdivision plans for Alternative 3 shall be revised to ensure that all of the resulting parcels can be developed without intrusion into the 50-foot wetland buffer so as to be consistent with Policy 6-57 Land Divisions of the 2020 LCLUP.

Implementation of **Mitigation Measures BIO-4a, BIO-4b, and BIO-4c** would be adequate to reduce the impact to a less-than-significant level. Additionally, with adherence to the aforementioned mitigation measures, it is anticipated that Alternative 3 would not conflict with applicable plan, policy or regulations adopted for the purpose of wetland protections, and this impact would be less than significant with mitigation, similar to the project.

Greenhouse Gas

Alternative 3 would have slightly higher GHG emissions than the project. GHG emissions generated during project construction would be similar to the Modified Alternative 2. The residential units proposed as a part of Alternative 3 would result in relatively increased long-term emissions associated with vehicle emissions and solid waste generation. However, based on the review of similar residential projects, the GHG emissions associated with Alternative 3 are anticipated to be well below BAAQMD's threshold of 660 MT of CO₂e. Therefore, Alternative 3 would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs and it is anticipated that this impact would be less than significant, similar to the project.

Land Use

Alternative 3 would require a lot line adjustment on the 5.02-acre parcel, adding 0.61 acres to the dealership and allowing for the creation of an 8-lot subdivision on the north side of Seymour Street on the 1.15-acre parcel owned by the project applicant. This use would be consistent with the parcel's LCLUP land use designation and Zoning Code.

The project site, between SR-1 and Main Street, is currently designated for Commercial General uses and zoned as PUD. Single- and multi-family residential uses are allowed within the Commercial General designation, with a maximum density equivalent to the Residential – High Density designation. Typical maximum building height is three-stories.

Based on the above, Alternative 3 would have less-than-significant impacts related to land use, similar to the project and Modified Alternative 2.

Noise and Vibration

Similar to the project and Modified Alternative 2, Alternative 3 would result in temporary noise increases that could exceed local standards.

Construction activities for the reduced hotel for Alternative 3 is expected to be similar to the project, which was estimated to last about 18 months. The same phasing information and equipment used in each phase is not expected to change under project alternative conditions. Therefore, with the implementation of *Construction Best Management Practices*, included in **Mitigation Measure NOI-1a**, the temporary construction would be reduced to a less-than-significant level similar to the project.

The additional multifamily homes located on the north side of Seymour Street; however, would generate temporary construction noise in close proximity to existing residential land uses, similar to Modified Alternative 2. Construction activities generate considerable amounts of noise, especially during earth-moving activities when heavy equipment is used. The highest maximum noise levels generated by the construction of the 2 main buildings would typically range from about 80 to 90 dBA L_{max} at a distance of 50 feet from the noise source, and typical hourly average noise levels for residential land uses would range from 65 to 88 dBA L_{eq} , as measured at a distance of 50 feet from the center of the site during busy construction periods (e.g., earth moving equipment, impact tools, etc.). Therefore, under Alternative 3, **Mitigation Measure NOI-1a** would also be applicable, and would reduce temporary construction noise impacts to a less-than-significant level at all noise-sensitive receptors surrounding the project site.

The future noise environment would exceed the exterior noise criteria by up to 7 dBA at the nearest residential structure adjoining Cabrillo Highway. To meet the exterior noise threshold, additional noise control measures would be implemented.

Methods available to reduce exterior noise levels at the backyards would be limited due to the small parcel of land available. The optimal measure for noise reduction would be to construct a sound wall or a specially-designed barrier fence capable of reducing noise levels by at least 7 dBA.

With the implementation of an 8-foot-tall barrier, the exterior noise environment would be at or below 60 dBA. The City could, however, approve a 6-foot barrier to achieve an exterior noise environment at the residential backyards of 65 dBA CNEL under a conditionally acceptable condition. Furthermore, consistent with the City's approval of residential development of other lots adjacent to Cabrillo Highway, the entire yard area would not need to conform to the 60 dBA threshold provided that a sound protected outdoor

space can be established on each site. Therefore, under Alternative 3, the proposed sound barrier would reduce impacts to a less-than-significant level at all noise-sensitive receptors surrounding the project site.

Transportation and Traffic

Similar to the project and Modified Alternative 2, Alternative 3 would be consistent with all programs, plans, and ordinances which address the circulation system in Half Moon Bay. However, Alternative 3 does not include bicycle rentals.

Trip generation is anticipated to be decreased under Alternative 3 as compared to the project and Modified Alternative 2. The multi-family units would produce an average of 425 trips per day. This represents 147 fewer trips per day when compared to Modified Alternative 2.

As described in **Section 5.5.2, Reduced Intensity, Modified Alternative 2**, the City of Half Moon Bay has not yet established thresholds of significance related to VMT. Therefore, this analysis follows the OPR Technical Advisory and assumes that a residential project generating vehicle travel that is 15 or more percent below the existing coastal region residential VMT per capita, 20.50 miles per capita, may indicate a less than significant VMT impact. Alternative 3 would have a base VMT of 19.63 miles per capita, which is the same as Modified Alternative 2 before VMT adjustments. There is also potential to apply VMT adjustments to Alternative 3 if some units were designated as affordable or a robust TDM program was applied. Even without any adjustments for affordability, Alternative 3 would be expected to result in a less than-significant VMT impact.

5.6 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

Section 21002 of the CEQA Guidelines requires lead agencies to adopt feasible mitigation measures or feasible environmentally superior alternatives in order to substantially lessen or avoid otherwise significant adverse environmental effects, unless specific social or other conditions make such mitigation measures or alternatives infeasible. CEQA also requires that an environmentally superior alternative be identified among the alternatives analyzed. In general, the environmentally superior alternative is the project that avoids or substantially lessens some or all of the significant and unavoidable impacts of the Proposed Project (CEQA Guidelines Section 15126.6). If one of the No Project Alternatives is the environmentally superior

alternative, the EIR must also specify which of the other build alternatives (including the project) would be environmentally superior.

On the basis of comparing the extent to which the alternatives would reduce or avoid the significant impacts of the project, No Alternative 1 would be the environmentally superior alternative. However, the No Project alternative, Alternative 1, would not attain the primary objectives of the project. As required by State CEQA Guidelines (California Code of Regulations Section 15126.6 [e][2]), because the environmentally superior alternative was identified as Alternative 1, another environmentally superior alternative must be identified among the other alternatives considered.

Modified Alternative 2 would result in lesser environmental impacts to some environmental resources and introduce incrementally greater impacts to others compared to the project. **Table 5-2** presents a comparative summary of the impacts for the project and each alternative.

Modified Alternative 2 would reduce the overall massing of the project as well as increase building setbacks, which would substantially reduce the aesthetic impacts associated with the project. The protected view of the ridgeline (available from Viewpoint 3) would not be obstructed by the structures associated with Modified Alternative 2. As such, Modified Alternative 2 would not result in a significant and unavoidable impact to protected scenic vistas and visual resources within a scenic corridor in the Coastal Zone, and would therefore be environmentally superior for this environmental criterion. The Half Moon Bay LCLUP policies establishing this protected visual resource are certified by the California Coastal Commission to implement the Coastal Act within the City of Half Moon Bay, and as such this is a matter of State interest.

Modified Alternative 2 would also result in fewer trips to and from the project site. Therefore, VMT associated with the hotel component of Modified Alternative 2 would be substantially reduced. Modified Alternative 2 would result in incrementally higher air pollutant and GHG emissions than the project.

Modified Alternative 2 would best meet the City's and project applicant's primary project objectives. Modified Alternative 2 would provide a development that is aesthetically pleasing by balancing the urban landscape with natural elements of the coast; would enhance the aesthetics of the Southern entry to the city; and would be designed contextually appropriate in order to match traditional development within the city and maintain adequate views. Modified Alternative 2 also includes a proposed four-lot parcel map for making future use of the 1.15-acre parcel north of Seymour Street conform to the underlying residential land use designation and R-2 zoning district. The

project does not include any residential units and will not support the City's efforts to meet its Regional Housing Needs Allocation (RHNA) for the Cycle 6 Housing Element.

Similar to Modified Alternative 2, Alternative 3 would result in lesser environmental impacts to some environmental resources and introduce incrementally greater impacts to others compared to the project. Alternative 3 would be similar in building floor area to Modified Alternative 2, and would result in a smaller building floor area, as compared to the project. Therefore, the aesthetic impacts associated with Alternative 3 would be similar to those identified for Modified Alternative 2, due to nearly identical building massing and footprints and would not result in significant and unavoidable impacts to protected scenic vistas, visual resources within a scenic corridor. Additionally, trip generation is anticipated to be decreased under Alternative 3 as compared to the project and Modified Alternative 2. Alternative 3 would result in similar air pollutant and GHG emissions as Modified Alternative 2 and incrementally higher air pollutant and GHG emissions than the project.

Given the above, Modified Alternative 2 and Alternative 3 are environmentally superior to the project. Both Modified Alternative 2 and Alternative 3 would substantially reduce the aesthetic impacts associated with the project as a result of the reduced project massing, increased setbacks, and improved site plan. While both Alternatives would have similar environmental effects, Modified Alternative 2 better aligns with the City's and project applicant's primary project objectives, goals, and policies, therefore, Modified Alternative 2 is the environmentally superior alternative.

Table 5-2 Comparison of Impacts between Project Alternatives

Environmental Topic	Project	No Project, Alternative 1		Reduced Intensity, Modified Alternative 2		Multi-Family Residential, Alternative 3	
		Significance	Comparison	Significance	Comparison	Significance	Comparison
Aesthetics							
Causes a substantial adverse effect on a scenic vista	SU	NI	↓	LTS	↓	LTS	↓
Substantially damages scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings with a State scenic highway	SU	NI	↓	LTS	↓	LTS	↓
Substantially degrades the existing visual character or quality of the site and its surroundings	SU	NI	↓	SU	=	SU	=
Creates a new source of substantial light or glare, which would adversely affect day or nighttime views in the area	LTS	NI	↓	LTS	=	LTS	=

Environmental Topic	Project	No Project, Alternative 1		Reduced Intensity, Modified Alternative 2		Multi-Family Residential, Alternative 3	
		Significance	Comparison	Significance	Comparison	Significance	Comparison
Cumulative	SCI	NCI	↓	NCI	↓	NCI	↓

Air Quality

Conflicts with or obstructs implementation of the BAAQMD 2017 Clean Air Plan	LTS	NI	↓	LTS	=	LTS	↓
Violates any air quality standard or contributes substantially to an existing or projected air quality violation	LTS/M	NI	↓	LTS/M	↑	LTS/M	↓
Exposes sensitive receptors to substantial pollutant concentrations, including those that increase health risks such as cancer	LTS	NI	↓	LTS	=	LTS	=
Creates objectionable odors affecting a substantial number of people	LTS	NI	↓	LTS	=	LTS	=

Environmental Topic	Project	No Project, Alternative 1		Reduced Intensity, Modified Alternative 2		Multi-Family Residential, Alternative 3	
		Significance	Comparison	Significance	Comparison	Significance	Comparison
Cumulative	NCI	NCI	↓	NCI	=	NCI	=

Biological Resources

Has a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife and or U.S. Fish and Wildlife Service	LTS/M	NI	↓	LTS/M	=	LTS/M	=
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Environmental Topic	Project	No Project, Alternative 1		Reduced Intensity, Modified Alternative 2		Multi-Family Residential, Alternative 3	
		Significance	Comparison	Significance	Comparison	Significance	Comparison
Has a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service	LTS/M	NI	↓	LTS/M	=	LTS/M	=
Has a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means	LTS	NI	↓	LTS/M	=	LTS/M	=
Interferes substantially with the movement of any native resident or	LTS	NI	↓	LTS	=	LTS	=

Environmental Topic	Project	No Project, Alternative 1		Reduced Intensity, Modified Alternative 2		Multi-Family Residential, Alternative 3	
		Significance	Comparison	Significance	Comparison	Significance	Comparison
migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites							
Conflicts with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance	LTS	NI	↓	LTS	=	LTS	=
Conflicts with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan	NI	NI	↓	NI	=	NI	=
Cumulative	NCI	NCI	↓	NCI	=	NCI	=

Environmental Topic	Project	No Project, Alternative 1		Reduced Intensity, Modified Alternative 2		Multi-Family Residential, Alternative 3	
		Significance	Comparison	Significance	Comparison	Significance	Comparison
Greenhouse Gas							
Generates greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment	LTS	NI	↓	LTS	↑	LTS	↑
Conflicts with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases	LTS	NI	↓	LTS	=	LTS	=
Cumulative	NCI	NCI	↓	NCI	=	NCI	=
Land Use and Planning							
Physically divides an established community	LTS	NI	=	LTS	=	LTS	=

Environmental Topic	Project	No Project, Alternative 1		Reduced Intensity, Modified Alternative 2		Multi-Family Residential, Alternative 3	
		Significance	Comparison	Significance	Comparison	Significance	Comparison
Causes a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect	LTS	NI	=	LTS	=	LTS	=
Cumulative	NCI	NCI	=	NCI	=	NCI	=
Noise and Vibration							
Generates a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies	LTS/M	NI	↓	LTS/M	=	LTS/M	=

Environmental Topic	Project	No Project, Alternative 1		Reduced Intensity, Modified Alternative 2		Multi-Family Residential, Alternative 3	
		Significance	Comparison	Significance	Comparison	Significance	Comparison
Generates excessive groundborne vibration or groundborne noise levels	LTS	NI	↓	LTS	=	LTS	=
Exposes people residing or working in the project area to excessive noise levels (for projects located within the vicinity of a private airstrip or an airport land use plan)	LTS	NI	↓	LTS	=	LTS	=
Cumulative	NCI	NI	↓	NCI	=	NCI	=
Transportation and Traffic							
Conflicts with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities	LTS	NI	↓	LTS	=	LTS	=

Environmental Topic	Project	No Project, Alternative 1		Reduced Intensity, Modified Alternative 2		Multi-Family Residential, Alternative 3	
		Significance	Comparison	Significance	Comparison	Significance	Comparison
Conflicts or is inconsistent with CEQA Guidelines section 15064.3, subdivision (b)	LTS	NI	↓	LTS	↓	LTS	↓
Substantially increases hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)	LTS	NI	↓	LTS	=	LTS	=
Substantially increases hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses	LTS	NI	↓	LTS	=	LTS	=
Results in inadequate emergency access	LTS	NI	↓	LTS	=	LTS	=
Cumulative	NCI	NI	↓	NCI	=	NCI	=

Key: NI = No Impact; LTS = Less than Significant; SU = Significant Unavoidable; LTS/M = Less than Significant with Mitigation; NCI = No Cumulative Impact; SCI = Significant Cumulative Impact; = Equal to; ↓ Lesser Impact than Project; ↑ Greater Impact than Project