

October 26, 2010

San Mateo County Planning Commission  
455 County Center  
Redwood City, CA 94063

**Re: Big Wave Project FEIR**

On behalf of the Pillar Ridge Homeowners Association, I submit the following comments on the Big Wave Project Final EIR and the staff report for the 10/27/10 public hearing. Due to the extremely short public comment period for such lengthy complex documents, our comments are necessarily rushed and incomplete. Please extend the public comment period to a minimum of 60 days to allow a more complete review. Please require complete story poles with the standard visible orange mesh during the entire review period.

**Visual Impacts**

Story poles were constructed only 5 days before the final EIR hearing with only half the buildings represented, and strung with thin sagging tape that is not visible from scenic viewpoints except for Airport St. Three days later some of the tape has already fallen down. After going to the trouble of raising the tall corner poles, one wonders why the standard visible orange mesh was not used, unless it was to avoid increased public awareness of the out-of-scale size and visual impacts of the project.

The following 3 photos were taken 10/21 - 25 and the story poles/tape have been enhanced so you can see them. Although the story poles only represent half the proposed buildings, they demonstrate some of the scenic vistas that are blocked and the large out-of-scale mass of the buildings.





How tall are the story poles and do they represent raised grade and roof structures? We are told the 2-story office buildings will be 36 ft tall, and 3-story buildings 46 ft tall, which is much taller than normal for that number of stories. Visual (and other) impacts would be reduced by shorter buildings. The inadequate EIR response is to leave this mitigation to the Design Review officer.



### **Landscaping**

EIR Response to our comment 185-13 ignores our stated concerns about project perimeter tree species not being adapted to our local heavy fog and strong salt-laden winds. Sycamore is very susceptible to anthracnose which would be greatly exacerbated by our moist foggy conditions. Our local strong salt-laden winds will cause leaf burn, twig dieback and reduced growth in the project-specified coastal species which are naturally found in more protected forest locations.

The response does not adequately address our stated concerns that trees planted as proposed along the property line with Pillar Ridge will impact our sewer and power lines at that location and will shade and endanger our homes if they blow over. It is costly, impractical, unattractive, and unenforceable for trees which naturally grow tall to “be maintained so as to not block the sun to the single-story homes on the northern side.” It makes more sense to plant appropriately from the start. The EIR response incorrectly states that our sewer pipeline is PVC which is more impervious to root intrusion, whereas, in fact, this last largest section carrying all sewage exiting our community is clay, dating from 1963. Water-loving trees in the project plan, such as alder, sycamore, maple, should be located 100 feet from Pillar Ridge, near the office buildings.

The “90% Basis of Design – Riparian & Water/Wetlands Ecosystem Restoration” report makes no mention of the straight row of tall perimeter trees along the Pillar Ridge and Airport St. boundaries other than their depiction on the site plan and the take-off list of plants, but it is our understanding that their purpose is to mitigate visual impacts by concealing the buildings. Therefore, they would still fill their purpose if planted in a more natural arrangement closer to the buildings. That would also fit better with the Local Coastal Plan which calls for tree and plant material native to the area, informal character, smooth transition (not a straight narrow row with abrupt transition).

New Table IV.N-3 (Vol. 1, p.III.B-37) “Plant Recycled Water Demand” shows upland plants require twice as much irrigation water in the wet season (11,000 gpd) as in the dry season which doesn’t make any sense at all except that the project sponsors need to dispose of the recycled water.

**Wetland Restoration** There is no requirement as to when wetlands restoration will occur. Revegetation is the best form of erosion control. Wetlands restoration should be required at completion of rough grading and wildlife barriers moved back closer to the buildings enabling the long process of recovery to begin. (comments 185-9, 10, 28 – not answered)

### **Expansive Soil/ Water Infiltration Systems/ Grading**

There are project inconsistencies in grading estimates and soil import/export requirements. Geology studies identify the approximately 2-foot-deep surface soil layer as expansive and impermeable and thus unsuitable for building pads and parking lots. If removed as recommended, we asked where it would go on site (in wetlands/buffer?), and how would building pads achieve their raised grade without importing suitable fill? (comment 185-29) The EIR response confirmed the soil would be put in the wetlands/buffer, claiming this is for creating “micro-topography” per the Wetlands Ecosystem Restoration report. Given the relative areas of parking lot and wetlands/buffer, that’s an awful lot of “micro-topography”. The phasing of the project outlined in the Development Agreement indicates both Wellness Center and Office Park sites would be rough graded in Phase I, but there is no phasing indicated as to when the wetlands on the Office Park would be restored. Placing grading spoils in wetlands and their buffers is not an allowable use under the LCP.

Conflicting information in new Table III-9 (Vol. 1, p. III.A-28) "Grading Estimates" makes no mention of wetlands/buffer zone, but shows Wellness Center parking & building pads have no cuts, leaving all impermeable expansive clay in place, and piling on more of the same (11,000 cy) from the northern parcel. The northern parcel as well appears to keep most of its impermeable clay on its parking and building pads. This is contrary to the stated goal of removing this unsuitable soil from building pads and permeable parking lots.

Changes to Project Description, Summary, D. Stormwater Drainage (p.III.A-5) describes eliminating "rain gardens" and adding roof runoff to parking lot infiltration system. In describing the adequacy of this system, it is stated that the "underlying soil ha(s) a permeability of one-half inch to 1 inch per hour." This is a crucial figure upon which the whole system depends and which has not yet been determined by any permeability tests. (comment 185-30 – inadequate response)

### **Drainage/Flooding**

We have reiterated our concern about the Pillar Ridge Community's vulnerability to massive flooding if Big Wave northwest culvert should fail or become blocked since the natural drainage at that location is blocked by the raised roadbed which Big Wave calls their North Trail. We supplied pictures of the badly corroded culvert and past flooding that occurred when the Big Wave North Trail was cleared in December 2005 and the mud/debris dumped in the culvert outfall. The EIR never mentions the significant watershed drainage west of Airport St. and north of Big Wave which must drain through this culvert. The EIR response was that this culvert on Big Wave property has nothing to do with the project. With all that the residents of Pillar Ridge will have to endure with the construction of this project, it is disappointing that there is no effort to address this relatively small issue for Big Wave (but important to us). (comment 185-34)

### **Reflected Noise**

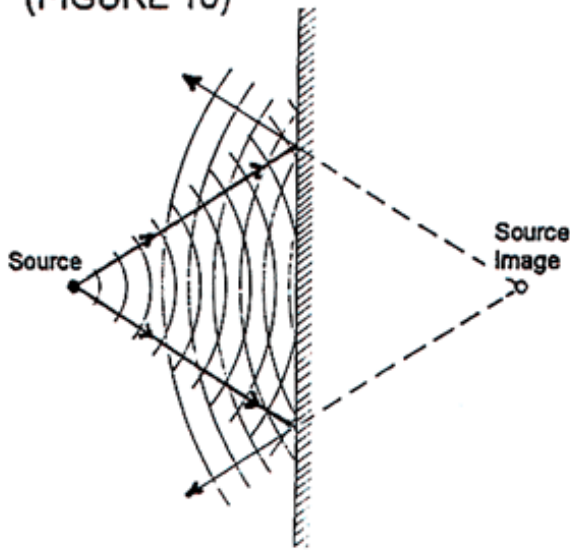
As a whole, our community is fairly stoic about airport noise. We recognize the importance of the airport and knew what we were getting into when we moved here. However, adding in the amplification and new direction of reflected noise off tall Office Park buildings seems like cruel and unusual punishment.

The EIR does not address impacts of single-event aircraft take-off noise reflecting off tall office buildings toward the residences at Pillar Ridge. Without studies or references, the EIR response makes the assumption that this effect would only be directed at the propane service yard at one corner of our community. (comment 185-36)

Following is a quote and figure from [www.acousticalsurfaces.com](http://www.acousticalsurfaces.com).

*"When a sound wave travels outward in all directions and encounters an obstacle such as a wall, floor or ceiling surface the direction of the sound will be changed or reflected. The direction of travel of the reflected sound will be at the same angle as the original sound striking the surface as shown in (FIGURE 10). The immediate effect of multiple reflections is an increase in the sound intensity caused by the reflections. A listener will hear the direct sound arriving at the ear along with all of the multiple reflections. Thus the combined loudness of the direct sound and the reflected sound will be greater than the direct sound alone."*

(FIGURE 10)



Since airplane take-off noise is not a single location but travels along the runway, and the Pillar Ridge homes lie over a 22-acre area, the increased airport noise from reflection would cover a large area and be a significant impact for us. To say that some future trees may grow 50 feet tall, or that our 6-foot perimeter chain link fence will buffer any noise reflected off 46-foot-tall buildings to our single-story homes is grossly inadequate. Trees generally do not attenuate sound.

**Traffic**

Inadequate indirect access roads for a project of this size cannot be mitigated by cramming a left-turn lane into already narrow Prospect Way, future traffic studies, and potential offsite parking outside the bottlenecks of Cypress and Prospect. Where would this offsite 50-car lot be? Using public parking at the visitor-serving harbor? For this idea to attract users the shuttle bus would need to run continuously and would itself add to the traffic. It’s as though this project were in the heart of a city and offsite parking in out-lying areas were needed to support the prime location. The Project proposes to flood the prime visitor-serving harbor area with office park traffic totally unrelated to Coastal Act priority uses.

Due to traffic impacts, Big Wave promises to limit Wellness Center retail services to project occupants. This will limit their potential for success, is contrary to their project goals, and is unenforceable – more evidence that this site is inappropriate for the project. The parking is further reduced, and allots no space for visitors to the residents (revised Table IV.M-10 (Vol 1, p.III.B-28).

**Transportation Hazards**

Greatly increased traffic in Princeton where streets are narrow and there are no sidewalks will increase danger, noise and fumes for Coastal Trail bike riders, and for pedestrians and bicyclists from Pillar Ridge as they walk and bike to work, school and shop. The proposed trail mitigation along Airport St. helps only in that location, and needs its own bridge across the creek that drains the airport land. There is not enough room to squeeze it into the roadway and protect it with K-rail, even though the EIR response calls this a potential “traffic calming” device. Traffic calming is generally not done with lethal concrete barriers. (comment 185-49)

The EIR does not adequately weigh the Project impacts on the narrow congested road segments for disaster evacuation. It is unrealistic to assume that everyone in Princeton and the Office Park will evacuate in an orderly manner on foot. (comment 185-44)

### **Parking**

The Project has already dramatically reduced its parking requirement by calling office buildings mixed use. Conditions in Princeton, where there are many violations of zoning and planning laws, suggest that the County does not have the will or resources to monitor the proportion of uses. Parking restrictions for Office Park parking lots in an effort to promote car pooling or transit use will also impact local streets with more on-street parking. **Any further reduction in parking requirements via a parking exemption should not be allowed.** (comments 185-46, 50 inadequate response)

### **Alternatives**

Most of the impacts of the Office Park could be reasonably solved by significantly downsizing the buildings, but this solution is always rejected due to claims of economic infeasibility. However, this project has been in the works since 2005. Well into studies and planning, as recently as 11/24/08, the Office Park was 156,000 sq.ft. (per building permit application). It wasn't until January 2009, with Draft 2 that the office park grew to 3-stories, 225,000 sq.ft. Now we are told the 156,000 sq.ft. office park is not economically feasible as an alternative. That assertion strains credibility.

The 10/27/10 Planning Dept. staff report, p.28, under Housing Component states (emphasis added), "The revenue from the 225,000 sq.ft. Office Park would allow **a portion** of the Wellness Center units to be affordable to disabled persons living below the poverty line. The applicant estimates that, in the instance where there is no demand for office space and **none of the office buildings are built**, the Wellness Center would continue to provide housing to disabled adults, but the units would not be affordable to disabled adults in the "extremely low" income category or those living below the poverty line. However, **the Wellness Center would still be affordable to the "low" or "very low" income populations**" (thus meeting County requirements for affordability). If the Wellness Center is built first as proposed, the units would presumably fill with very-low to moderate-income residents and there would be no over-riding need for such a massively-sized office park.

Please do not approve this project as currently proposed. Thank you for the opportunity to comment.

Sincerely,

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