

**APPENDIX B:**  
**NOP and Comment Letters**





NOTICE OF PREPARATION  
ENVIRONMENTAL IMPACT REPORT, SCOPING MEETING  
AND PUBLIC WORKSHOP  
COASTSIDE FIRE PROTECTION DISTRICT

DATE: June 30, 2015

TO: State Clearinghouse  
State Responsible Agencies  
State Trustee Agencies  
Other Public Agencies  
Interested Organizations

FROM: Paul Cole  
Assistant Chief  
Coastside Fire Protection District  
1191 Main Street  
Half Moon Bay, CA 94019

SUBJECT: Notice of Preparation (NOP) of the Draft Environmental Impact Review (EIR), Scoping Meeting and Public Workshop for the Fire Station 41 (El Granada) Replacement Project

LEAD AGENCY/SPONSOR: Coastside Fire Protection District

PROJECT TITLE: Fire Station 41 (El Granada) Replacement Project

This NOP has been prepared for the EIR for the Fire Station 41 (El Granada) Replacement project, herein referred to as "Project" or "proposed Project". The Coastside Fire Protection District (CFPD) is the Lead Agency for the preparation of an EIR for the proposed Project. The determination to prepare an EIR was made by the CFPD. This NOP is prepared in compliance with Section 15802 of the California Environmental Quality Act (CEQA) Guidelines. The CFPD is soliciting comments on the scope and content of the EIR. The CFPD will prepare an EIR to address the environmental impacts associated with the development of the Fire Station 41 (El Granada) project. The proposed Project, its location and potential environmental effects are described below.

Members of the public and public agencies are invited to provide comments in writing as to the scope and content of the EIR. The CFPD needs to know the views of your agency as to the scope and content of the environmental information that is germane to your agency's statutory responsibilities in connection with the proposed Project. Your agency will need to use the EIR prepared by the CFPD when considering your permits or other approvals for the Project.

Due to the time limits mandated by State law, your response must be sent at the earliest possible date, but no later than the close of the 30-day NOP review period at 5:00 p.m. on Wednesday, July 29, 2015. A Scoping Meeting and Public Workshop will be held on Thursday, July 16, 2015 from 7:00 to 8:30 p.m. at the El Granada Elementary School Multi-Purpose Room located at 400 Santiago Street, Half Moon Bay, CA 94019.

Please send your comments to Paul Cole, Assistant Chief, at 1191 Main Street, Half Moon Bay, CA 94019 or email to paul.cole@fire.ca.gov with "Fire Station 41 (El Granada) Replacement Project EIR" as the subject. Please include a contact person for your agency.

Name: Paul Cole, Assistant Chief

Signature: \_\_\_\_\_

### 1. Project Location

The Project site is located on Assessor's Parcel Number (APN) 047-261-030 in the Community of El Granada in the northern coastal area of unincorporated San Mateo County. It is located approximately three miles northwest of Half Moon Bay, eight miles southeast of Pacifica, and 18 miles south of San Francisco. Regional access is provided via Cabrillo Highway (Highway 1), located to the south of the Project site. The Project site is an undeveloped 2.5-acre parcel of land bound by Avenue Alhambra to the north, Coronado Street to the east, Obispo Road to the south, and Avenue Portola to the west. The location of the Project would be accessible via Obispo Road, Avenue Alhambra, and Avenue Portola.

### 2. Project Description

The CFPD proposes the construction of a new fire station, at the location described above, to replace the existing Fire Station 41, currently located at the northwest corner of the Obispo Road/ Avenue Portola intersection. At buildout, the Project would result in a new 10,000 square-foot, single-story fire station, with three bays providing drive-through access via Obispo Road, as well as on-site secured parking for staff, and on-site public parking. The maximum height of the Project would be approximately 30 feet above finish grade at the center of the three-bays, in order to accommodate the height of the fire trucks and equipment; however, other areas of the structure would be below 30 feet in height. Other features of the Project include the installation of an emergency generator and an above ground fuel tank within secured areas. The Project would include native, drought tolerant landscaping, as well as a new sidewalk along the frontage of the proposed Fire Station 41. Given the sloped topography and existing vegetation at the Project site, site preparation would include the removal of existing trees and vegetation, as well as require site grading and the construction of retaining walls. Approximate earthwork quantities are 4,300 cubic yards of excavation and 2,000 cubic yards of fill with net export of 2,300 cubic yards of material. Project construction is expected to occur throughout a single 12-15-month phase period and is estimated to start in summer 2016.

Consistent with Section 15161 of the CEQA Guidelines a project-level EIR will be prepared to analyze the potential impacts of constructing and operating the Fire Station 41 (El Granada) project. The EIR will disclose the significant environmental effects of the Project and suggest mitigation measures and project alternatives to reduce those impacts to an acceptable level.

### 3. Public Agency Approvals

The proposed Project would require San Mateo County approval of a Coastal Development Permit, Use Permit, and Grading Permit at a fully noticed public hearing. That decision would be appealable to the California Coastal Commission. A Certificate of Compliance pursuant to Section 7134 of the San Mateo County Subdivision Regulations for legalization of parcels may also be required. The proposed Project would also require approval and EIR certification by the CFPD Board of Directors. The EIR will evaluate the impacts related to the County required coastal development permit, use permit, variance, grading permit, and building permit. The Project may also require the approval of the San Francisco Regional Water Quality Control Board for permits related to water quality.

### 4. Environmental Factors Potentially Affected

An Initial Study was prepared pursuant to the CEQA (Public Resources Code Sections 21000 et seq.), CEQA Guidelines (Title 14, Section 15000 et seq. of the California Code of Regulations). The Initial Study can be viewed at the CFPD website at <http://www.coastsidefire.org/home>. As shown in the Initial Study, environmental topic areas that will be analyzed in the EIR include: aesthetics, air quality, biological resources, hazards and hazardous materials, hydrology and water quality, land use and planning, noise, and transportation and circulation.

Topics that are likely to be associated with less-than-significant impacts and are not expected to be evaluated in detail in the EIR include: agriculture and forestry resources, cultural resources, geology and soils, greenhouse gas emissions, land use and planning, mineral resources, population and housing, public services, recreation, and utilities and service systems.



**FIRE STATION 41 (EL GRANADA) REPLACEMENT  
PROJECT EIR:**

**NOTICE OF PREPARATION COMMENTS LETTERS**

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Edmund G. Brown Jr.  
Governor

STATE OF CALIFORNIA  
Governor's Office of Planning and Research  
State Clearinghouse and Planning Unit



Ken Alex  
Director

**Notice of Preparation**

June 30, 2015

To: Reviewing Agencies

Re: Fire Station 41 (El Granada) Replacement Project  
SCH# 2015062089

Attached for your review and comment is the Notice of Preparation (NOP) for the Fire Station 41 (El Granada) Replacement Project draft Environmental Impact Report (EIR).

Responsible agencies must transmit their comments on the scope and content of the NOP, focusing on specific information related to their own statutory responsibility, within 30 days of receipt of the NOP from the Lead Agency. This is a courtesy notice provided by the State Clearinghouse with a reminder for you to comment in a timely manner. We encourage other agencies to also respond to this notice and express their concerns early in the environmental review process.

Please direct your comments to:

**Paul Cole**  
**Coastside County Water District**  
**1191 Main Street**  
**Half Moon Bay, CA 94019**

with a copy to the State Clearinghouse in the Office of Planning and Research. Please refer to the SCH number noted above in all correspondence concerning this project.

If you have any questions about the environmental document review process, please call the State Clearinghouse at (916) 445-0613.

Sincerely,

Scott Morgan  
Director, State Clearinghouse

Attachments  
cc: Lead Agency

**Document Details Report  
State Clearinghouse Data Base**

**SCH#** 2015062089  
**Project Title** Fire Station 41 (El Granada) Replacement Project  
**Lead Agency** Coastside Fire Protection District

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**Type** NOP Notice of Preparation

**Description** The CFPD proposes the construction of a new fire station to replace the existing Fire Station 41 currently located at the northwest corner of the Obispo Road/Avenue Portola intersection. At buildout, the Project would result in a new 10,000 sf, single-story fire station, with three bays providing drive-through access via Obispo Road, as well as on-site secured parking for staff, and on-site public parking. The maximum height of the Project would be approximately 30 feet above finish grade. The Project includes the installation of an emergency generator and an above ground fuel tank within secured areas. The Project would include native, drought tolerant landscaping and a new sidewalk along the frontage of the proposed Fire Station 41. Site preparation includes the removal of existing trees and vegetation, and site grading.

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**Lead Agency Contact**

<b>Name</b>	Paul Cole		
<b>Agency</b>	Coastside County Water District		
<b>Phone</b>	650 726 5213	<b>Fax</b>	
<b>email</b>			
<b>Address</b>	1191 Main Street		
<b>City</b>	Half Moon Bay	<b>State</b> CA	<b>Zip</b> 94019

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**Project Location**

<b>County</b>	San Mateo			
<b>City</b>				
<b>Region</b>				
<b>Cross Streets</b>	Avenue Alhambra / Coronado Street / Obispo Road			
<b>Lat / Long</b>	37° 30' 7" N / 122° 28' 2.6" W			
<b>Parcel No.</b>	047-261-030			
<b>Township</b>		<b>Range</b>	<b>Section</b>	<b>Base</b> MDB&M

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**Proximity to:**

<b>Highways</b>	Hwy 1
<b>Airports</b>	
<b>Railways</b>	
<b>Waterways</b>	Pacific Ocean
<b>Schools</b>	El Granada ES
<b>Land Use</b>	Vacant / El Granada Gateway & Neigh. Bus. District, Design Review, Coastal Dev./Open Space w/Park Overlay & Neigh. Comm.

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**Project Issues**

<b>Reviewing Agencies</b>	Resources Agency; California Coastal Commission; Cal Fire; Office of Historic Preservation; Department of Parks and Recreation; Department of Water Resources; Department of Fish and Wildlife, Region 3; Native American Heritage Commission; California Highway Patrol; Caltrans, District 4; Air Resources Board; Regional Water Quality Control Board, Region 2
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<b>Date Received</b>	06/30/2015	<b>Start of Review</b>	06/30/2015	<b>End of Review</b>	07/29/2015
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## NOP Distribution List

County: San Mateo

SCH#

Resources Agency

☒ Resources Agency  
Nadell Gayou

☐ Dept. of Boating & Waterways  
Denise Peterson

☒ California Coastal Commission  
Elizabeth A. Fuchs

☐ Colorado River Board  
Lisa Johansen

☐ Dept. of Conservation  
Elizabeth Carpenter

☐ California Energy Commission  
Eric Knight

☒ Cal Fire  
Dan Foster

☐ Central Valley Flood Protection Board  
James Herota

☒ Office of Historic Preservation  
Ron Parsons

☒ Dept of Parks & Recreation  
Environmental Stewardship Section

☐ California Department of Resources, Recycling & Recovery  
Sue O'Leary

☐ S.F. Bay Conservation & Dev't. Comm.  
Steve McAdam

☒ Dept. of Water Resources  
Resources Agency  
Nadell Gayou

Fish and Game

☐ Depart. of Fish & Wildlife  
Scott Flint  
Environmental Services Division

☐ Fish & Wildlife Region 1  
Curt Babcock

☐ Fish & Wildlife Region 1E  
Laurie Harnsberger

☐ Fish & Wildlife Region 2  
Jeff Drongesen

☒ Fish & Wildlife Region 3  
Charles Armor

☐ Fish & Wildlife Region 4  
Julie Vance

☐ Fish & Wildlife Region 5  
Leslie Newton-Reed  
Habitat Conservation Program

☐ Fish & Wildlife Region 6  
Tiffany Ellis  
Habitat Conservation Program

☐ Fish & Wildlife Region 6 I/M  
Heidi Calvert  
Inyo/Mono, Habitat Conservation Program

☐ Dept. of Fish & Wildlife Marine Region  
George Isaac

Other Departments

☐ Food & Agriculture  
Sandra Schubert  
Dept. of Food and Agriculture

☐ Depart. of General Services  
Public School Construction

☐ Dept. of General Services  
Anna Garbeff  
Environmental Services Section

☐ Delta Stewardship Council  
Kevan Samsam

☐ Housing & Comm. Dev.  
CEQA Coordinator  
Housing Policy Division

Independent Commissions, Boards

☐ Delta Protection Commission  
Michael Machado

☐ OES (Office of Emergency Services)  
Marcia Scully

☒ Native American Heritage Comm.  
Debbie Treadway

☐ Public Utilities Commission  
Supervisor

☐ Santa Monica Bay Restoration  
Guangyu Wang

☐ State Lands Commission  
Jennifer Deleong

☐ Tahoe Regional Planning Agency (TRPA)  
Cherry Jacques

Cal State Transportation Agency CalSTA

☐ Caltrans - Division of Aeronautics  
Philip Crimmins

☐ Caltrans - Planning  
HQ LD-IGR  
Terri Pencovic

☒ California Highway Patrol  
Suzann Ikeuchi  
Office of Special Projects

Dept. of Transportation

☐ Caltrans, District 1  
Rex Jackman

☐ Caltrans, District 2  
Marcelino Gonzalez

☐ Caltrans, District 3  
Eric Federicks - South  
Susan Zanchi - North

☒ Caltrans, District 4  
Patricia Maurice

☐ Caltrans, District 5  
Larry Newland

☐ Caltrans, District 6  
Michael Navarro

☐ Caltrans, District 7  
Dianna Watson

☐ Caltrans, District 8  
Mark Roberts

☐ Caltrans, District 9  
Gayle Rosander

☐ Caltrans, District 10  
Tom Dumas

☐ Caltrans, District 11  
Jacob Armstrong

☐ Caltrans, District 12  
Maureen El Harake

Cal EPAAir Resources Board

☒ All Other Projects  
Cathi Slaminski

☐ Transportation Projects  
Nesamani Kalandiyur

☐ Industrial/Energy Projects  
Mike Tollstrup

☐ State Water Resources Control Board  
Regional Programs Unit  
Division of Financial Assistance

☐ State Water Resources Control Board  
Karen Larsen  
Division of Drinking Water

☐ State Water Resources Control Board  
Student Intern, 401 Water Quality Certification Unit  
Division of Water Quality

☐ State Water Resources Control Board  
Phil Crader  
Division of Water Rights

☐ Dept. of Toxic Substances Control  
CEQA Tracking Center

☐ Department of Pesticide Regulation  
CEQA Coordinator

Regional Water Quality Control Board (RWQCB)

☐ RWQCB 1  
Cathleen Hudson  
North Coast Region (1)

☒ RWQCB 2  
Environmental Document Coordinator  
San Francisco Bay Region (2)

☐ RWQCB 3  
Central Coast Region (3)

☐ RWQCB 4  
Teresa Rodgers  
Los Angeles Region (4)

☐ RWQCB 5S  
Central Valley Region (5)

☐ RWQCB 5F  
Central Valley Region (5)  
Fresno Branch Office

☐ RWQCB 5R  
Central Valley Region (5)  
Redding Branch Office

☐ RWQCB 6  
Lahontan Region (6)

☐ RWQCB 6V  
Lahontan Region (6)  
Victorville Branch Office

☐ RWQCB 7  
Colorado River Basin Region (7)

☐ RWQCB 8  
Santa Ana Region (8)

☐ RWQCB 9  
San Diego Region (9)

☐ Other \_\_\_\_\_

☐ \_\_\_\_\_  
Conservancy

**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

**RECEIVED**

2015 JUL -3 A 10: 56 June 30, 2015

**SAN MATEO COUNTY  
PLANNING AND BUILDING  
DEPARTMENT**

Summer Burlison, Project Planner  
County of San Mateo – Planning and Building Department  
455 County Center, 2<sup>nd</sup> Floor  
Redwood City, CA 94063-1665

RE: PRE2015-00029 (Paul Cole, Coastside Fire), APN047-261-030

Dear Ms. Burlison:

Thank you for the County's Planning Permit Application Referral for PRE2015-00029 that we received on June 5, 2015. We appreciate the opportunity to comment on the Coastside County Fire Protection's proposal to construct a 10,000-sq.-ft., single-story, fire station with 18 parking spaces located on a vacant 2.5-acre (108,900 square-foot) parcel located at Obispo Road and Avenue Alhambra in El Granada. The proposed project is for replacement of the existing 4,000-sq.-ft. facility located at 531 Obispo Road. The proposed project raises concerns with respect to coastal resource issues that include, visual, biological (sensitive habitat and species), and land use. Our comments are provided below.

#### Jurisdiction

The proposed project site is located within the Coastal Zone, east of Highway 1 in the community of El Granada. The proposed project would potentially be conducted within 100 feet of a stream, a sensitive coastal resource area, and is not a principally-permitted use. Therefore, the proposed project is appealable to the Commission.

#### Permitted Use and Future Land Use

The area is located in the Coastal Zone within the El Granada Gateway District (EG) zone; therefore development must adhere to applicable regulations contained in Chapter 12.6 of the certified Local Coastal Program (LCP) zoning regulations. The proposed fire station is not included in the list of permitted uses allowed to locate in the EG district as provided in Section 6229.3. Section 6500(b) allows for the issuance of a use permit for the location of, among other things, public service uses or public buildings in any district when found to be necessary for the public health, safety, convenience, or welfare. Under this section, thus, the relocated fire house may be an allowable use. However, Section 6500(f) requires that approved uses shall be consistent with all the policies and standards of the LCP, and the proposed relocation is not consistent (see additional comments below).

Re-alignment of Highway 1 is a permitted use under Section 6229.3 in the EG district. Caltrans is currently required to consider future re-alignment of Highway 1 in close proximity to the proposed project area as an option to address erosion problems along the coast, particularly at



Surfer's Beach located westerly of the proposed project site. Looking ahead it would be prudent to locate a new facility where it can remain in place for the long-term. A facility at the proposed project site may potentially conflict with future plans to re-locate Highway 1 further inland. We respectfully suggest that Coastside County Fire Protection consider alternative locations for the replacement fire station that will not conflict with the need to re-align Highway 1 or any other assets due to sea-level rise and or erosion of the coast in proximity to the project area.

#### Development Criteria and Standards

Section 6229.4 provides development criteria and standards for the EG zoning district. All new development must meet the criteria and standards therein that include a 3.5-acre minimal parcel size, 16-foot maximum building height, and a maximum of 10% coverage of the parcel. The proposed fire station would be: 1) constructed on a 2.5-acre parcel, 2) 30 feet in height, and 3) 10,000 square feet (that exceeds the required 10% maximum parcel coverage), inconsistent with the LCP requirements.

#### Biological

There is a drainage area with riparian habitat located in the central portion of the undeveloped parcel. This drainage and habitat are to the west of the area where the fire station is proposed for construction. The referral, however, indicates that the entire project site and surrounding area is flagged as possible monarch butterfly and San Francisco garter snake habitat. Approximately six to nine mature trees would be removed as part of the project. LCP Policy 7.1 defines sensitive habitats as any area in which plant or animal life or their habitats are either rare or especially valuable and any area that contains or supports rare and endangered species (as defined by the California Department of Fish and Wildlife). Sensitive Habitats are protected by the provisions of LCP Policy 7.3 that prohibits any land use or development that would result in a significant, adverse, impact on sensitive habitat areas. Policy 7.3 requires that development in areas adjacent to sensitive habitat shall be sited and designed to prevent impacts that could significantly degrade the sensitive habitat. The proposed use must also be compatible with maintenance of the biologic productivity of the resource/habitat, as required by Policy 7.3. Policy 7.4 permits only resource-dependent uses in sensitive habitats. LCP Policy 7.36 requires that development be prevented from occurring where it is known to be a riparian location for San Francisco garter snake. The proposed development is a facility for fire protection purposes and it could potentially interfere with maintenance of the riparian habitat and result in an adverse impact on these San Francisco garter snake and monarch butterfly. The impacts of the proposed fire station on sensitive habitats must be fully evaluated; and the project must be designed consistent with LCP policies 7.1, 7.3, 7.4, and 7.36 that protect sensitive habitats. We suggest that the applicant have a qualified biologist survey the biological resources on the parcel and an assessment of habitats. Based upon the results applicable LCP policies for riparian corridors and wetlands must be applied to the proposed project. These include riparian policies 7.7, 7.9, 7.10, 7.11, and 7.12. Applicable LCP policies for the protection of wetlands include 7.14, 7.16, 7.17, and 7.18.

#### Visual

The proposed project site is an undeveloped 108,900 square-foot (2.5-acre parcel) located to the east of State Highway 1 within the Cabrillo Highway/Highway 1 County Scenic Corridor. The proposed project includes grading of the site comprising excavation of 4,300 cubic yards of

Summer Burlison  
PRE2015-00029 (Paul Cole, Coastside Fire)  
June 30, 2015

material and 2,300 cubic yards of fill. The proposed project would result in the removal of six to nine mature trees. LCP Policy 8.5 requires that development on urban parcels larger than 20,000 square feet be located on a portion of the parcel that is least visible from State and County Scenic Roads. The LCP requires that proposed development best preserve the visual and open space qualities of the parcel overall. LCP Policy 8.9 requires that new development be located and designed to minimize tree removal. LCP Policy 8.13 sets design guidelines for coastal communities that include El Granada. Policy 8.13 requires that structures be designed such that the proposed construction does not require extensive cutting, grading, or filling. LCP Policy 8.32 requires that the design criteria of the Community Design Manual be applied to development including the design guidelines for El Granada. The proposed project must be consistent with the LCP policies 8.5, 8.9, 8.13, and 8.32 that protect visual resources within the Coastal Zone.

We support the County's plan to replace its obsolete fire station with a new, modern one; however the proposed location presents inconsistencies with the requirements of the certified LCP. Above all the proposed project raises concerns as it may potentially conflict with the need to re-locate Highway 1 further inland in order to protect coastal access in this area. We encourage Coastside County Fire Protection to identify alternative sites for a new fire station and are available to review those locations and provide comments.

Please feel free to contact me via e-mail at [rananda@coastal.ca.gov](mailto:rananda@coastal.ca.gov) or call me at 415-904-5292 if you have questions regarding our comments.

Sincerely,



Renée Ananda, Coastal Program Analyst  
Coastal Commission  
North Central Coast District



**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

**RECEIVED**

2015 JUL 27 A 11:03

**SAN MATEO COUNTY  
PLANNING AND BUILDING  
DEPARTMENT**

July 23, 2015

Paul Cole  
Coastside County Water District  
1191 Main Street  
Half Moon Bay, CA 94019

RE: Fire Station 41 (El Granada) Replacement Project

Dear Mr. Cole:

The Coastside Fire Protection District (CFPD) proposes to construct a 10,000-sq.-ft., single-story, fire station with 18 parking spaces on a vacant, 2.5-acre (108,900 square feet) parcel located at Obispo Road and Avenue Alhambra in El Granada. The proposed new fire station would replace the existing Station 41 located at 531 Obispo Road. We received a Notice of Preparation of a Draft Environmental Impact Report (EIR)/Initial Study dated June 30, 2015 in our North Central Coast District office on July 1, 2015. CFPD is the Lead Agency for preparation of an EIR as required by the California Environmental Quality Act (CEQA). Thank you for the opportunity to provide comments on the scope and content of the EIR for the proposed project.

As you may know, we already provided preliminary comments on the proposed project in response to the San Mateo County Planning Department's pre-application project referral (PRE2015-00029). As we indicated in those comments, the proposed project raises concerns with respect to consistency with the County's Local Coastal Program's (LCP) visual resources, biological resources (sensitive habitat and species), and land use policies. I have attached a copy of our June 30, 2015 comment letter for your reference, as these preliminary comments were submitted to the County prior to our receipt of the distributed NOP/IS.

Permitted Use and Future Land Use

The discussion in the Land Use and Planning section (Section X.b) of the Initial Study does not fully address the proposed project's consistency with the County's certified LCP and indicates that this issue, including mitigation measures, will not be discussed further in the DEIR. The proposed project is located in the County's Coastal Zone within the El Granada Gateway District (EG) zone; therefore new development must adhere to applicable regulations contained in Chapter 12.6 of the certified LCP zoning regulations. The proposed new fire station is not included in the list of permitted uses allowed in the EG district as provided in Section 6229.3 of the LCP. Section 6500(b) allows for the issuance of a use permit for the location of, among other things, public service uses or public buildings in any district when found to be necessary for the public health, safety, convenience, or welfare. Under this section, thus, the relocation of and construction of a larger, newer fire house may be an allowable use. However, Section 6500(f) also requires that approved uses shall be consistent with all the policies and standards of

the LCP, and the proposed relocation and new fire station is not consistent with the allowed uses provided in the LCP.

The NOP/IS indicates that CFPD is considering splitting the parcel location for the new fire station into two separate parcels. Thus the project would include both a subdivision and a request for a new larger relocated fire station. The undeveloped, westernmost portion of the parcel (designated under the General Plan as Neighborhood Business District/Design Review/Coastal Development) would be created as a separate parcel. This potential land division is development, as defined in LCP Policy 1.2 (definition of development) and will require a coastal development permit. The land division is currently being considered by the CFPD; therefore we suggest that this potential project, at a minimum, be analyzed in the DEIR's discussion of cumulative impacts.

#### Hazards

Section IX.j of the IS indicates that no further discussion or analysis will be included in the EIR to assess the potential impacts of seiche, tsunami, or mudflow. The Hazards Component of the County's LCP defines hazardous areas to include land that is subject to dangers from tsunamis and flooding, among other things. The project site is located within a Tsunami Inundation Hazard Area as shown on the Natural Hazards Map in the Natural Hazards Chapter of the San Mateo County General Plan and the California Geological Survey (CGS) tsunami inundation maps. The IS does not sufficiently analyze the proposed project for its conformity with the LCP tsunami hazard policies. The intent of Section 6326.2, so that risks to human life and properties are minimized, is to prohibit certain types of development within tsunami hazard areas and require allowable development to meet certain criteria. The LCP also requires that development within coastal high hazard areas subject to high velocity waters from tsunamis meet the requirements of Section 6825.3 which include that the structure be in compliance with applicable construction standards and building regulations. CFPD must demonstrate that the proposed project is consistent with the building standards outlined in Section 6825.3.

Re-alignment of Highway 1 is a permitted use under Section 6229.3 in the EG district. Based upon recent CDP action, Caltrans is currently required to consider future re-alignment of Highway 1 in close proximity to the proposed project area as an option to address sea level rise and ongoing erosion problems along the coast, particularly at Surfer's Beach located westerly of the proposed project site. For that reason, looking ahead it would be prudent to locate a new firehouse facility where it can remain in place for the long-term. A facility proposed at the current project site may potentially conflict with Caltrans' future plans to re-locate Highway 1 further inland. We respectfully suggest that Coastside Fire Protection District consider alternative locations for the new fire station that will not conflict with a future need to re-align Highway 1 due to sea-level rise and or erosion of the coast in proximity to the project area. The DEIR must analyze the potential cumulative effect of placing a new station at the proposed location.

The new fire station is publicly-owned and would be occupied by humans. As we understand fire station operations, firefighters would basically live at the station while on duty. Fire stations typically have sleeping quarters, living room, dining areas and kitchens, etc. and are designed for human occupancy. LCP Section 6326.2(a) requires that publicly-owned buildings intended for

human occupancy, other than park and recreational facilities, shall not be permitted within all areas defined as Tsunami Inundation Hazard Areas. The proposed replacement fire station would be staffed by a three-person company; with each staff person working 2.5 shifts per week; thus the fire station would be occupied by humans every day of the week. The proposed project is therefore not consistent with the permitted-use requirement provided in Section 6326.2(a). Additionally, the IS includes the statement that "because the CFPD staff would likely be involved in evacuation of the public, this impact is less than significant." We believe the contrary, that as a public, emergency services provider it is more advantageous and practical to locate a replacement station outside of (away from) the tsunami inundation area. The alternatives analysis in the EIR must factor in each site's vulnerability to potential impacts from tsunami inundation.

#### Development Criteria and Standards

Section 6229.4 provides development criteria and standards for the EG zoning district. All new development must meet the criteria and standards therein that include a 3.5-acre minimal parcel size, 16-foot maximum building height, and a maximum of 10% coverage of the parcel. The proposed fire station would be: 1) constructed on a 2.5-acre parcel, 2) 30 feet in height, and 3) 10,000 square feet which would exceed the required 10% maximum parcel coverage, inconsistent with the LCP requirements.

#### Public Access/Recreation and Transportation

As noted in the IS, there is a coastal access trail located along the south side of Highway 1 extending southward to the City of Half Moon Bay. Surfer's Beach, a public, coastal destination is also located to the west of the proposed project. The IS indicates that the EIR analysis will include an assessment of potential impacts from the proposed project on pedestrians and bicyclists. We recommend that the analysis must consider impacts both during and after construction; and any mitigation measures that may be required to avoid or reduce impacts.

The IS indicates the proposed project would generate fewer than 20 peak hour trips; therefore it would not result in substantial increases in congestion and delays in the roadway system. The discussion states that there would be less potential conflicts with the existing neighborhood commercial traffic on Avenue Portola, however does not address the proposed project's potential impact on access to the coastline. LCP Policy 2.51 requires that road capacity for visitors to the coast be protected and that the efficiency and effectiveness of existing roadways be maximized during recreation peak periods. The EIR must analyze/discuss the proposed project's potential traffic impacts on coastal access, individually and cumulatively. Specifically describe and analyze the proposed project's contribution to traffic congestion on Highway 1 during recreation peak periods; along with mitigation measures to avoid or minimize such impacts.

#### Biological

There is a drainage area with riparian habitat located in the central portion of the undeveloped parcel. This drainage and habitat are located to the west of the area where the fire station is proposed for construction and is referred to as "drainage 2" in the August 7, 2014 *Riparian Setback Analysis* prepared by TRA Environmental Sciences. The result of the TRA analysis is that this meets the definition of a perennial stream and therefore a 50-foot buffer is required by LCP Policy 7.7. However in *The Preliminary Environmentally Sensitive Habitat Areas*

Paul Cole  
NOP/IS  
Fire Station 41 (El Granada) Replacement Project  
July 23, 2015

*Assessment at the Proposed Coastsides Fire District Project in El Granada, San Mateo County, California* prepared by WRA, identifies the same drainage as being intermittent and therefore recommends a 30-foot setback. The analysis in the EIR must clarify whether the stream is perennial or intermittent in order to determine the appropriate buffer required by the LCP. The EIR analysis must include a detailed biological evaluation of the resources on the parcel that includes a delineation of wetlands. Please refer to the attached letter for additional comments with respect to sensitive habitats and biological resources.

Visual

The proposed project site is an undeveloped 108,900 square-foot (2.5-acre parcel) located to the east of State Highway 1 within the Cabrillo Highway/Highway 1 County Scenic Corridor. The proposed project includes grading of the site comprising excavation of 4,300 cubic yards of material and placement of 2,300 cubic yards of fill. The EIR must analyze the proposed fire station's consistency with LCP visual resource policies that include 8.5 (Location of Development), 8.6 (Streams, Wetlands, and Estuaries), 8.9 (Trees), 8.13 (Special Design Guidelines for Coastal Communities), and 8.32 (Regulation of Scenic Corridors in Urban Areas) for the protection of visual resources. LCP Policy 8.6, in particular, prohibits structural development which will adversely affect the visual quality of perennial streams and associated riparian habitat, except for those permitted by Sensitive Habitats Component Policies. The EIR must analyze the proposed project's potential to result in visual impacts on the riparian area/perennial stream located within and in proximity to the parcel. Please see the attached letter that includes comments on the proposed project's potential to result in impacts on visual and scenic resources.

In summary, the proposed location presents inconsistencies with the requirements of the certified LCP. The proposed project also raises concerns as it may potentially conflict with the need in the future to re-locate Highway 1 further inland in order to protect coastal access in this area. We encourage the Coastsides Fire Protection District to adaptively plan for the relocation and consider a site that has no potential to conflict with the above referenced policies of the LCP.

Please feel free to contact me via e-mail at [rananda@coastal.ca.gov](mailto:rananda@coastal.ca.gov) or call me at 415-904-5292 if you have questions regarding our comments.

Sincerely,



Renée Ananda, Coastal Program Analyst  
California Coastal Commission  
North Central Coast District

CC: Summer Burlison, San Mateo County Planning and Building Department



**From:** "Jim Marsh (AIR)" <Jim.Marsh@flysfo.com>

**Date:** Tuesday, July 14, 2015 3:21 PM

**To:** Paul Cole <Paul.Cole@fire.ca.gov>

**Cc:** jmarsh jmarsh <jmarsh@montara.com>, "Jim Marsh (AIR)" <Jim.Marsh@flysfo.com>

**Subject:** fire house #41

Dear Assistant Chief Cole

The new location at the southernmost corner of the lot is, literally, from my view the worst place possible on the long parcel. No one can honestly deny a proper level of public services for our Community, for our visitors. We all support the fire and emergency service providers

My suggestions are based upon

- 1 My background in Engineering, Construction, and construction management on the Coastside and here over the hill
- 2 the chosen location would block entirely my ocean view – creating a continuous wall of structures from the two apartments all the way to the intersection with Coronado
- 3 this portion of the property drops precipitously from Alhambra down to Obispo, creating grading, storm drainage issues as well as retaining walls, and resulting loss of useable footprint – this also raises the 30 ft height relative to the existing blockages
- 4 this industrial structure/ facility is plunked down into a purely residential area creating all manner of concerns about public safety on the roads or for the many children who walk along Alhambra to the nearby schools.
- 5 utilities will need to be stretched to reach this isolated location
- 6 traffic and access to / from Obispo is substantially worse than the sight lines and egress/ ingress at Portola location
- 7 this portion of the lot is riparian, while the area by the PO is and has often been used as 'commercial'
- 8 Sam Trans
- 9 worst spot on the lot

Suggestions ?

Make use of the "commercial" corner adjacent to the PO and put temporary facilities for the crew on this portion of the "lot" and rebuild the current building in it's current location. Placing the facility in the area of the commercial hub of El Granada would accomplish positive outcomes for our Community.

- 1 see items 2-9 above
- 2 reduce the 'footprint' of man: reduce the urge for new greenfield construction/ destruction – good for us, good for the planet, and fortunately which would thus allow our children & grandchildren at least one landuse choice for them to make
- 3 keep the firehouse and the crew closer to services that they utilize: food, beverage, tools, equipment, parking, the PO – if you relocate to the far end, the use of these local services will be curtailed –
- 4 the construction time period will produce a "camping out"/ common event for your crew which will certainly provide history, events and camaraderie

- 5 perhaps you and your partner GCSD could work collaboratively to find options if you need additional space adjacent to their office
- 6 after reconstruction, once vacated, the PO adjacent lot, perhaps the Community could have a public restroom/ shower facility – we Coastsiders are friendly folk and want to supply services to our visitors
- 7 this PO corner portion of the lot is the only valuable piece, as the rest is plainly riparian, and thus with a public restroom cluttering up the area/ size the future “desire” / need for commercial usage would be nullified

Basic questions:

- 1 what type of evaluation was made to rule out the patching & repainting option ?
- 2 why not rebuild on the commercial/ less sloping site next to the PO
- 3 what numbers do you have for emergency calls to the North, South to Coronado or uphill to our houses or the forest?
- 4 distribution and type of fire calls ?
- 5 the current facility is what about 60x60 – how or why is the proposed building three times the size –
- 6 three truck bays – are you planning to move a truck up here, do you have an appropriate vehicle or need

Let’s work together to provide Community services that are right for the times, for public safety and for our people. No one can honestly deny a proper level of public services for our Community or our visitors. We need to agree on the word “proper”

Please add my email to your announcement queue

Please do not hesitate to share this email with the Board, your designers, and interested parties

**Subject:** FW: CFPD El Granada Station  
**From:** Paul Cole (pcole@coastsidefire.org)  
**To:** vmartin5@pacbell.net;  
**Date:** Sunday, July 19, 2015 6:02 PM

Hi Neal,

Below is an email I received today regards the new fire station site.

Regards,

Paul Cole



Assistant Chief – Operations / Special Operations  
***CAL FIRE – San Mateo – Santa Cruz Unit***  
**Coastside Fire Protection District**  
(650) 726-5213 - Phone  
(650) 726-0132 - Fax  
(650) 740-7246 - Cell  
[www.fire.ca.gov/CZU](http://www.fire.ca.gov/CZU)

---

**From:** John Lynch <johnlynch140@gmail.com>  
**Date:** Sunday, July 19, 2015 5:29 PM  
**To:** Paul Cole <Paul.Cole@fire.ca.gov>  
**Subject:** CFPD El Granada Station

Please give serious consideration to build the new El Granada Fire Station at the current Comcast Location at 625 Obispo Road,

Why? Take a good hard look at this web site.  
<http://www.firestationunderwater.org/>

It gives ten good and valid reasons why you should do it in best interests of the Coastside Community.

Respectfully submitted.

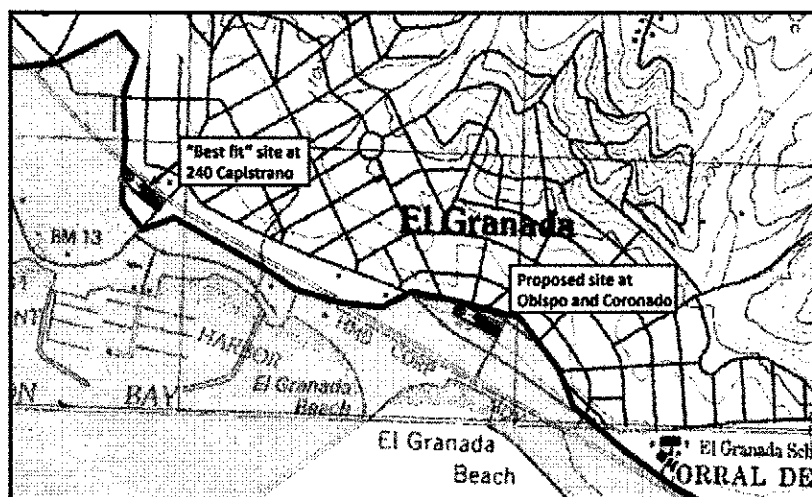
John & Jule Lynch

2098 Touraine Lane  
Half Moon Bay, CA 94019  
650-726-9189

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## 10 Reasons Why Building a 10,000 Square Foot Fire Station at the Corner of Coronado and Obispo Does Not Make Sense



### **1) Traffic. An expanded fire station will increase traffic congestion.**

The fire station is not "moving." It is being replaced with a station twice the size. And at a proposed site that is at one of the busiest intersections in El Granada. The roads are narrow in these areas. How will the crews quickly get to the busiest parts of their territory (north of Sam's) when all of the cars on the road can't pull over because of the cars parked on the shoulder? The Fire Board does not think that an analysis of the impact that the proposed Fire Station will have on increasing traffic congestion is necessary.

### **2) Hazardous emissions. The project will emit hazardous emissions and hazardous materials near two elementary schools.**

"The El Granada Elementary School is located approximately 500 feet (0.10 mile) from the Project site's southwest border. Directly across Coronado Street, is the Wilkinson School, a private school for kindergarten through 8th grade students." (pg. 35 of the Initial Study Checklist).

### **3) Toxic air contaminants during the 15+ months of construction. The project will increase the level of toxic air contaminants for the residents and schools that are located within 300 feet of the proposed fire station.**

"The Project would elevate concentrations of toxic air contaminants (TACs) and diesel-PM2.5 in the vicinity of sensitive land uses during construction activities. BAAQMD has developed screening thresholds for assessing potential health risks from construction activities. Receptors would have to be located more than 300 feet away to fall below the BAAQMD's screening thresholds." (pg. 16 of the Initial Study Checklist)

**4) Noise. The Fire Station will generate noise levels in excess of County standards.**

"The Project site is located directly adjacent to single- and multi-family homes along its northern boundary, as well as Wilkinson School across Coronado Street at the Project site's eastern boundary...Noises associated with operation of a fire station, such as fire alarms and emergency vehicle sirens, could generate noise levels in excess of County standards." (pg. 47 of the Initial Study Checklist)

**5) Ground vibration. The Fire Station will create excessive ground vibration during construction.**

"The Project could have the potential to result in significant levels of vibration attributed to equipment that could be used during construction, such as tractors, soil compaction, and vibratory rollers, that may be perceptible at nearby sensitive receptors." (pg. 47 of the Initial Study Checklist). Given the rate that the bluffs are eroding away without this vibration, do you think that speeding that process is a good thing?

**6) Light pollution. The proposed Fire Station will cause light pollution that will degrade the aesthetic quality of the area.**

The proposed Fire Station "would include new sources of light and glare to the Project site, including, but not limited to, exterior and interior lighting, a potentially significant impact could occur." (pg. 12 of the Initial Study Checklist)

**7) Noxious odors. The Fire Station will create noxious odors during construction that are a nuisance to residents and school children.**

"During construction activities, the application of asphalt and architectural coatings would temporarily generate odors. Additionally, noxious odors would be confined to the immediate vicinity of the construction equipment." (pg. 17 of the Initial Study Checklist)

**8) Flooding. The \$7.4 Million Dollar Proposed Fire Station is being built in an area that is susceptible to coastal flooding and tsunamis.**

"The Project site is within the mapped area of a coastal base flood and future sea level rise of 55 inches...The Project site is within a mapped tsunami inundation zone...Since the Project site is susceptible to tsunamis, it is also possible that seiches would occur." (pg. 41-43 of the Initial Study Checklist). What do you think it costs to replace a flooded fire station? What about flooded fire engines?

**9) No long-term planning. The Proposed Fire Station will be built several hundred feet from the eroding bluffs.**

The proposed Fire Station is located less than 300 feet from eroding bluffs. Vibration from construction could hasten



the erosion. How does this fit with the stated goal of building a station for the next 50 years? The Fire Board does not think that an analysis of the impact that the construction, excavation, and vibration will cause on the eroding bluffs is necessary.

**10) There are better options. An independent analysis has identified better fit sites for a new fire station.**

An independent analysis concluded that the corner of Hwy 1 and Capistrano (240 Capistrano Rd) or a second site on Hwy 1 (11820 Cabrillo) would be the best fit sites for a new fire station.

It might seem like common sense, but this analysis also concluded that the selection of a site for a fire station should take into account traffic access for fire trucks and impacts to neighbors. Stations should not be located in positions that require the first 60-80 seconds of travel to be through open space areas, or on very narrow, congested streets. Based on current data, most of the calls from the El Granada station would be heading north of the proposed site.

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**9) No long-term planning. The Proposed Fire Station will be built several hundred feet from the eroding bluffs.**

The proposed Fire Station is located less than 300 feet from eroding bluffs. Vibration from construction could hasten the erosion. How does this fit with the stated goal of building a station for the next 50 years? The Fire Board does not think that an analysis of the impact that the construction, excavation, and vibration will cause on the eroding bluffs is necessary.

**10) There are better options. An independent analysis has identified better fit sites for a new fire station.**

An independent analysis concluded that the corner of Hwy 1 and Capistrano (240 Capistrano Rd) or a second site on Hwy 1 (11820 Cabrillo) would be the best fit sites for a new fire station.

It might seem like common sense, but this analysis also concluded that the selection of a site for a fire station should take into account traffic access for fire trucks and impacts to neighbors. Stations should not be located in positions that require the first 60-80 seconds of travel to be through open space areas, or on very narrow, congested streets. Based on current data, most of the calls from the El Granada station would be heading north of the proposed site.

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## Adverse Impacts

- The Fire Board's Plan to build a new fire station in a Tsunami Zone goes against the community, common sense, and a formal analysis conducted by Citygate Associates LLC that concluded that 240 Capistrano was the "best fit" for a new fire station and that site selection should be based on parcel size, traffic access, cost, and impact to neighbors.
- The Fire Board is proposing to build the new Fire Station in the middle of our residential community.
- Building this Fire Station could cause additional traffic congestion, noise pollution, light pollution, and environmental pollution (See Initial Report in Key Documents).



**Distance from homeowner's property:**

625 Ave Alhambra	~45 ft (across the street)
615 Ave Alhambra	~50 ft (across the street)
130 Santa Anna Ave	~110 ft
610 Coronado	~125 ft
639 Coronado	~125 ft
615 Coronado	~190 ft
222 Ave Cabrillo	~225 ft
960 The Alameda	~225 ft
980 The Alameda	~240 ft
990 Ave Alhambra	~250 ft

## How Bad Can Traffic In the Neighborhood Get?

## How About Putting An Expanded Fire Station Down at the Light On Coronado?

This proposal just doesn't make sense. Results from an independent analysis conducted for the fire district state:

Stations should not be located in positions that require the first 60-80 seconds of travel to be through open space areas, or on very narrow, congested streets. Such situations waste response time coverage, or hamper it, as the responding unit cannot clear the immediate station area quickly enough to reach the outer edges of its assigned area in an appropriate amount of time

Most of the calls from the EG station would be heading north of the proposed site (based on data from current calls - calls north would increase further with the big wave development)

Factors to consider in selecting a site should take into account traffic access for fire trucks and impacts to neighbors

As a result, this independent analysis concluded that the corner of Hwy 1 and Capistrano (240 Capistrano Rd) or a second site on Hwy 1 (11820 Cabrillo) would be appropriate sites for a new fire station

So, why does the fire board want to put a new, expanded fire station in a residential neighborhood and directly across from a school at one of the busiest intersections in EG between Obispo and Alhambra at Coronado?

## **Do You Have Children At Wilkinson or EG Elementary School?**

The proposed site for the expanded fire station is in a residential neighborhood and directly across from the Wilkinson School and about 500 feet away from the EG Elementary School at one of the busiest intersections in EG between Obispo and Alhambra at Coronado.

The fire board's initial study checklist minimizes the impact that an expanded station on that site will have on the children at the schools by stating that the new station will simply be a replacement for the current station and that the number of trips will not increase congestion or delays. However, the rationale for this project is that a largely expanded station (almost double the size with an additional engine) will be needed in the future to handle additional capacity. So, you can't have it both ways, you either need a larger station with more trucks for more trips or you don't.

What does this mean for the kids at these two schools:

- At least 15 months of construction
- An increase in toxic air contaminants such as diesel fumes from engines and an on-site generator that will be tested at least once a week (note the fire board does not think that this merits further discussion in the full environmental impact report)
- The constant distraction by fire alarms and emergency vehicle sirens. The "worst-case scenario" is estimated to be 3 trips per hour (note the fire board does not think that this merits further discussion in the full environmental impact report)

- The potential for additional vehicular and pedestrian/bike conflicts. “The Project may result in potential conflicts related to firetruck activity and pedestrian and bicyclist circulation. In addition an analysis would be required to ensure that adequate sight stopping distance at the Project driveways is provided.” “Because emergency vehicle activity would occur in an area where pedestrian and bicycle circulation infrastructure is limited, there would be the potential for additional vehicular and pedestrian/bike conflicts.”

## Does the EG Gateway District mean anything anymore?

The proposed site for the expanded fire station is in a residential neighborhood and directly across from a school at one of the busiest intersections in EG between Obispo and Alhambra at Coronado.

For good reason, this land is designated as Open Space with Park Overlay Urban and is zoned El Granada Gateway/Design Review/Coastal Development (EG/DR/CD). The EG zoning has limited number of allowed uses and strict development requirements. The proposed expanded fire station will need an exception to the building setbacks and a Use Permit due to the height of the building proposed to be built right in front of neighbors' homes. Do you think these variances should be granted for a 10,000 sq. ft. fire station in the EG Gateway at a site that is below the Tsunami inundation line?

**Results from the fire board's initial study checklist indicate that there would be potentially significant impacts on the following:**

- “Substantial adverse impact on a scenic vista”
- “Substantially degrade the existing visual character or quality of the site and its surroundings”
- “Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area”
- “Violate any air quality standard or contribute substantially to an existing or projected air quality violation”
- “Result in a cumulatively considerable net increase of any criteria pollutant”

- “Expose sensitive receptors to substantial pollutant concentrations”
- “Have 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 US Fish and Wildlife Service”
- “Exposure of person to or generation of excessive groundbourne vibration or ground borne noise levels”
- “A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project”

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## Key Documents

### CityGate's Independent Analysis



[\(/uploads/5/3/4/5/53453055/citygate.analysis.pdf\)](/uploads/5/3/4/5/53453055/citygate.analysis.pdf)

citygate.analysis.pdf

[Download File \(/uploads/5/3/4/5/53453055/citygate.analysis.pdf\)](/uploads/5/3/4/5/53453055/citygate.analysis.pdf)

### El Granada Fire Station 41 Report



[\(/uploads/5/3/4/5/53453055/elgranadafirestation41\\_initialstudy\\_final\\_063015.pdf\)](/uploads/5/3/4/5/53453055/elgranadafirestation41_initialstudy_final_063015.pdf)

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### Costs for the Proposed Fire Station (Over \$7.4 Million)



[\(/uploads/5/3/4/5/53453055/firestation41projectcosts.pdf\)](/uploads/5/3/4/5/53453055/firestation41projectcosts.pdf)

firestation41projectcosts.pdf

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## Latest News

- Notice of Pre-Application Public Workshop: Public Workshop to allow for public comment on the the proposal to build a new fire station in El Granada. The meeting will be at **7pm on July 16 (Thursday) 2015**. The meeting will be held at the El Granada Elementary School (Multi-Purpose Room), 400 Santiago Street.

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**Subject:** FW: Granada Station 41 Replacement Project EIR (Resent to this address)  
**From:** Cole, Paul@CALFIRE (Paul.Cole@fire.ca.gov)  
**To:** vmartin5@pacbell.net;  
**Cc:** pcole@coastsidefire.org;  
**Date:** Thursday, July 23, 2015 5:29 AM

Hi Neal,

Please add the email below to the comment file.

Regards,

Paul Cole



Assistant Chief – Operations / Special Operations

***CAL FIRE – San Mateo – Santa Cruz Unit***

**Coastside Fire Protection District**

(650) 726-5213 - Phone

(650) 726-0132 - Fax

(650) 740-7246 - Cell

[www.fire.ca.gov/CZU](http://www.fire.ca.gov/CZU)

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**From:** ken king <exeditor2003@yahoo.com>  
**Reply-To:** ken king <exeditor2003@yahoo.com>  
**Date:** Wednesday, July 22, 2015 8:02 PM  
**To:** Paul Cole <Paul.Cole@fire.ca.gov>  
**Subject:** Granada Station 41 Replacement Project EIR (Resent to this address)

Dear Chief Cole,

As a longtime Half Moon Bay resident, I am writing to express concern about the stated intention of your District to build a new fire station at Obispo and Coronado, a mere half-block from the Coronado/Highway 1 intersection, which twice daily is a major traffic bottleneck, as well as most summer and fall weekend days. I do not understand how situating a major project near this troubled commuter corridor will serve the interest of your local citizens who already experience enough problems negotiating this intersection for ordinary purposes



now.

The long vacant Comcast building is located nearby and could be modified to suit the purposes of the District without affecting the Coronado commute traffic, and would most likely cost less to reconstruct, and not compete with other worthwhile, low intensity purposes the Obispo/Coronado property could serve.

It is vital that your District realize its part in maintaining the aesthetic appeal of semi-rural El Granada and not permanently damage it by paving over and erecting a large edifice at this scenic entryway to the community. That should be the key to the District's decision, that it consider the community as a whole and not just the institutional interests of the District.

Thank you for considering my remarks.

Sincerely,

Kenneth King  
633 Terrace Avenue  
Half Moon Bay, CA 94019  
650 726-4268

**Subject:** Fwd: 'Granada Station 41,Replacement Project EIR' as the subject  
**From:** Cole, Paul@CALFIRE (Paul.Cole@fire.ca.gov)  
**To:** vmartin5@pacbell.net,  
**Date:** Tuesday, July 28, 2015 1:27 PM

Please add the email below to our records. Thanks

Sent from my Samsung Galaxy smartphone.

----- Original message -----  
**From:** Leni <leni@sanmateo.org>  
**Date:** 07/28/2015 1:08 PM (GMT-08:00)  
**To:** "Cole, Paul@CALFIRE" <Paul.Cole@fire.ca.gov>  
**Subject:** Fwd: 'Granada Station 41,Replacement Project EIR' as the subject.

----- Forwarded Message -----  
**Subject:** 'Granada Station 41,Replacement Project EIR' as the subject.  
**Date:** Tue, 28 Jul 2015 02:07:31 -0700  
**From:** Leni <leni@sanmateo.org>  
**To:** paulcole@fire.ca.gov

**RE: PRE2015-00029 (Paul Cole, Coastside Fire), APN047-261-030**

Dear Mr Cole,

I believe that the Fire Station Replacement project location should be changed.

The California Environmental Quality Act guidelines require the lead agency to consider alternate strategies that are less environmentally damaging. The proposed project is concerning with respect to coastal resource issues that include visual, biological ie sensitive habitat and species, and land use.

The California Coastal Commission has outlined specifics in the letter dated June 30, 2015 addressed to the San Mateo County Planning and Building Department.

Thank you,  
Leni Schultz  
El Granada  
July 28, 2015

**From:** Jim Marsh <jmarsh@montara.com>  
**Date:** Tuesday, July 28, 2015 8:21 PM  
**To:** Paul Cole <Paul.Cole@fire.ca.gov>  
**Subject:** fire house 41 - please reconsider Rebuilding

hello

As part of the County's process I have submitted the attached letter.

Thank you for your service to the Community, now we must talk, share and listen - fire house 41

The study is flawed and directed only to get this project through the process.

None of this is about the Community of El Granada.

Rebuilding on site is cheaper, faster, and cleaner than ANYTHING else.

please reconsider Rebuilding and let's begin

jim

James Marsh  
PO Box 433  
El Granada, CA 94018

Re: Coastside Fire Protection District Fire House 41 = Replacement Initial Study comments

Dear Ms. Burlison

As stated at the El Granada School meeting on July 16, and as outlined in the Study, the site chosen at the far southern end of the property by Coronado street/ traffic light at hwy 1, this site is the worst place on the lot for this facility.

The site is plagued ( from Coastal Commission letter ) with concern: "the proposed project raises concerns with respect to coastal resource issues that include, visual biological ( sensitive habitat and species), and land use."

Please see from the initial study section X – Land Use and the incorrect boxes checked: "less than significant impact", - this building and it's related noise, commotion and odors, will forever change/ denigrate the neighborhood , the nearby schools. The land use plan for the County and certainly the town Architect Daniel Burnham did not ever consider this sloping, triangular, riparian site as a public use facility. Currently the lot is zoned open space which precludes building.

Lets move back from this process and reconsider our options – I am a firm believer that the existing site could be more exhaustively studied for function and designability. Building onsite also follows the call of the parable about the footprint of man, and alternatively, allowing our children/ grandchildren to decide. Let's' open up a Community dialogue – for all of us – including the environment, the place of El Granada.

Thank you

James Marsh

07-28-15

**From:** Lawrence Carter <carter.lawrence@gmail.com>

**Date:** Wednesday, July 29, 2015 1:41 PM

**To:** Paul Cole <Paul.Cole@fire.ca.gov>

**Cc:** "dhorsley@smcgov.org" <dhorsley@smcgov.org>, "Ananda, Renee@Coastal"

<Renee.Ananda@coastal.ca.gov>, "assemblymember.gordon@assembly.ca.gov"

<assemblymember.gordon@assembly.ca.gov>

**Subject:** Fire Station 41 (El Granada) Replacement Project EIR

Assistant Chief Cole,

Attached, please find a letter containing feedback from myself and my wife Beth Easter regarding the Notice of Preparation of the Draft Environmental Impact Review for the Fire Station 41 Replacement Project. You may consider me as the contact person for the both of us. I am also mailing a signed, hard copy of this letter that will be postmarked with today's date.

Thank you,

Larry Carter

--

-----  
Lawrence P. Carter

PO Box 661

El Granada, CA 94018

Cell: 812-325-5693

July 29, 2015

To: Paul Cole  
Assistant Chief  
Coastside Fire Protection District  
1191 Main Street  
Half Moon Bay, CA 94019

Subject: Fire Station 41 (El Granada) Replacement Project EIR

---

The purpose of this letter is to provide written comments on the scope and content of the Environmental Impact Report (EIR) for the proposed site for the replacement and expansion of Fire Station 41. We are writing both as members of the public in the affected area of the proposed project (residence at 222 Avenue Cabrillo in El Granada) and as highly trained experts in the biological sciences (Lawrence Carter, Ph.D.) and in law, public policy, and political science (Beth Easter, J.D., Ph.D.). Thus, the issues that we raise below constitute substantial evidence comprised of facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts.

Under the law, the basic purposes of the California Environmental Quality Act (CEQA) are to:

- (1) Inform governmental decision makers and the public about the potential, significant environmental effects of proposed activities.
- (2) Identify ways that environmental damage can be avoided or significantly reduced.
- (3) Prevent significant, avoidable damage to the environment by requiring changes in projects through the use of alternatives or mitigation measures when the governmental agency finds the changes to be feasible.
- (4) Disclose to the public the reasons why a governmental agency approved the project in the manner the agency chose if significant environmental effects are involved.

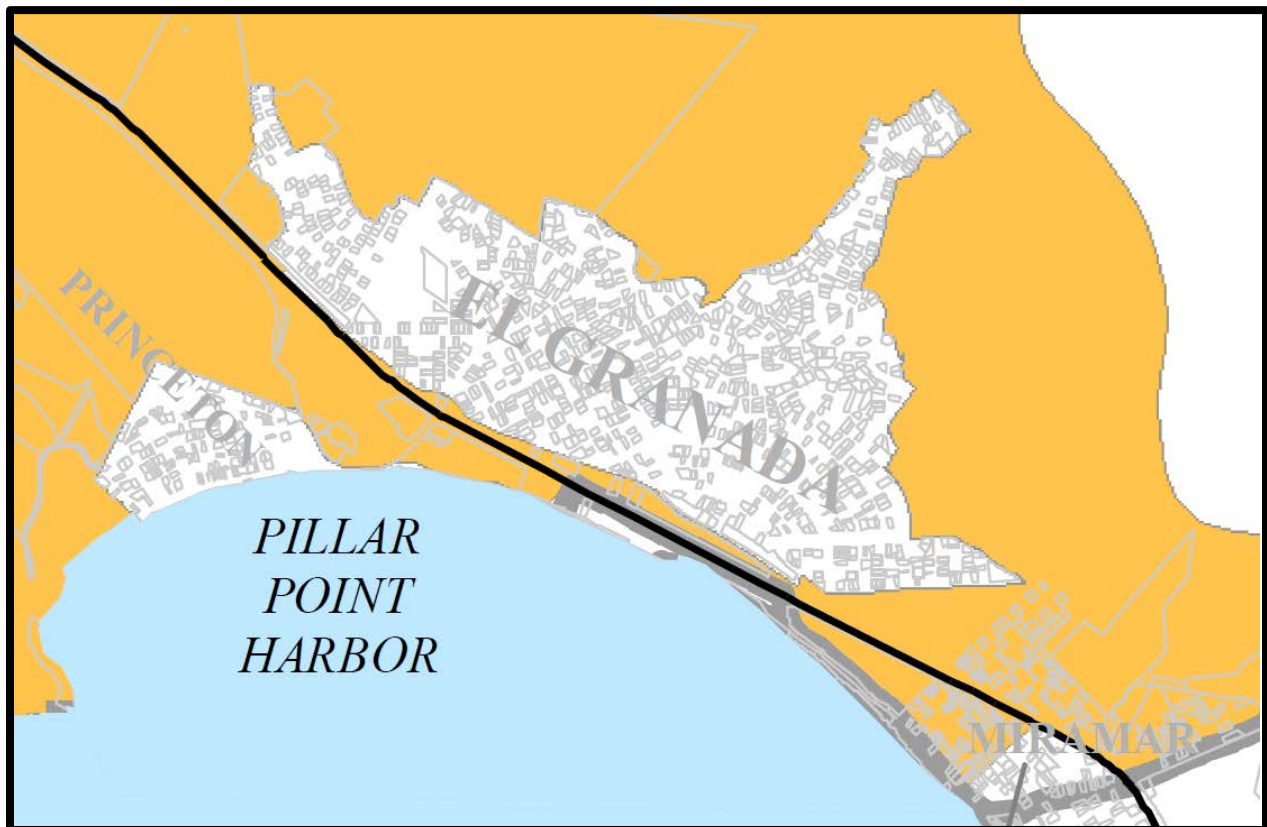
In accordance with the law, we are writing to provide comments on the scope and content of the EIR for the proposed project to inform governmental decision makers about the potential, significant environmental effects of proposed activities, to identify ways that environmental damage can be avoided, and to prevent significant, avoidable damage to the environment by requiring changes in the proposed project through the use of an alternative site for the proposed project, which is not only entirely feasible, but has been recommended by an independent analysis.

**Potential, significant environmental effects of proposed activities**

Under the law, a significant effect on the environment is defined as a substantial adverse change in the physical conditions which exist in the area affected by the proposed project.

## Aesthetics

The initial study checklist states that “given the distance of the Project site from this segment of Highway 1, and because the Project site itself is not located immediately adjacent to a State designated scenic highway, there would be no impact. No mitigation measures are required and this issue will not be discussed further in the EIR.” As shown on the map of County-designated scenic corridors below, the proposed project would lie directly adjacent to a scenic corridor and the height of the proposed building has been acknowledged to obscure views, which would substantially damage scenic resources along a State highway that has been designated as a scenic corridor by San Mateo County. For this reason, all of the potentially significant impacts on aesthetics are direct physical changes that should be addressed in the full EIR.



The proposed project would obscure a scenic vista and substantially damage scenic resources along a State highway that has been designated as a scenic corridor by San Mateo County (source: <http://planning.smcgov.org/documents/san-mateo-county-scenic-corridors>)

## Air Quality

The initial study checklist states that:

“The Project would include installation of an emergency diesel-fueled generator on-site. Emergency generators are operated intermittently, during times of periodic testing and maintenance. Diesel particulate exhaust, a chemical with cancer potency factors and Reference Exposure Levels (RELs),

would be emitted only during testing periods. Since emergency generators are tested infrequently throughout the year (typically once a week), exposure to diesel particulate exhaust from emergency generators is generally very low. Therefore, emissions generated by the emergency generator are a less-than significant impact. No mitigation measures are warranted and this issue will not be discussed further in the EIR.”

and

“During construction activities, the application of asphalt and architectural coatings would temporarily generate odors. Any construction-related odor emissions would be temporary and intermittent in nature. Additionally, noxious odors would be confined to the immediate vicinity of the construction equipment. By the time such emissions reach any sensitive receptor sites, they would be diluted to well below any level of air quality concern. Impacts would be less than significant. No mitigation measures are warranted and this issue will not be discussed further in the EIR.”

It is important to note that under the law, all phases of project planning, implementation, and operation must be considered in the initial study of the project and that the lead agency must consider the whole of an action, not simply its constituent parts, when determining whether it will have a significant environmental effect. (Citizens Assoc. For Sensible Development of Bishop Area v. County of Inyo (1985) 172 Cal.App.3d 151). For these reasons, the potentially significant impacts of the increase in diesel pollutants, fumes, and other odors are direct physical changes that should be addressed in the full EIR.

### **Cultural Resources**

The initial study checklist states that:

“The records search revealed that the OHP Historic Property Directory (which includes listings of the California Register of Historical Resources, California State Historical Landmarks, California State Points of Historical Interest, and the National Register of Historic Places) does not list any recorded buildings or structures within or adjacent to the Project site. Further, the Project site itself is currently undeveloped and therefore does not have any structures that would be historically significant. As such, there would be no impact related to historical resources. No mitigation measures are required and this issue will not be discussed further in the EIR.”

It is important to note that El Granada’s Burnham Plan – that is, the design of the public plazas, oceanfront promenades, and boulevards radiating from a central location that define the neighborhood is recognized by the San Mateo County Historic Resources Advisory Board. In addition, the site of the proposed project is designated as Open Space with Park Overlay Urban and is zoned El Granada Gateway/Design Review/Coastal Development (EG/DR/CD). Consistent with the historically recognized Burnham Plan, EG zoning has a limited number of allowed uses and strict development requirements. Consistent with these facts is that a resource shall generally be considered by the lead agency to be “historically significant” if the resource meets the criteria for listing on the California Register of Historical Resources (Pub. Res. Code, § 5024.1, Title 14 CCR, Section 4852) including being associated



with the lives of persons important in our past (i.e., Daniel Burnham) or embodying the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic value. The fact that a resource is not listed in, or determined to be eligible for listing in the California Register of Historical Resources, not included in a local register of historical resources (pursuant to section 5020.1(k) of the Public Resources Code), or identified in an historical resources survey (meeting the criteria in section 5024.1(g) of the Public Resources Code) does not preclude a lead agency from determining that the resource may be an historical resource as defined in Public Resources Code sections 5020.1(j) or 5024.1.

Under the law, an examination of whether the project would be consistent with existing zoning, plans, and other applicable land use controls is required. Moreover, the Burnham Plan constitutes a significant historical resource as identified and recognized by San Mateo County. Public agencies must treat any such resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant. Any site, area, or place that is determined to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be an historical resource.

A project with an effect that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment. The proposed project would result in a substantial adverse change in the significance of an historical resource (i.e., the Burnham Plan) through the physical demolition, destruction, and alteration of the open space and oceanfront promenade that is characteristic of the plan. Such direct physical changes would materially impair the significance of this historical resource and should be addressed in the full EIR.

### **Geology and Soils**

The initial study checklist states that:

“Construction of the Project would entail grading and limited excavation. Such activities carry some inherent potential for soil erosion and/or loss of topsoil... Compliance with the General Plan goal and policies listed above, which requires minimization and protection against the loss of topsoil and erosion during construction activities, such as excavation, grading, and filling, as well as compliance with the RWQCB and the implementation of a SWPPP and BMPs, ensure that impacts related to erosion and the loss of topsoil would remain less than significant. No mitigation measures are required and this issue will not be discussed further in the EIR.”

and

“As described above, the topography at the Project site is subdued with elevations ranging from 23 to 28 feet amsl and gentle slopes to the southwest in the direction of the Pacific Ocean. Similarly, the potential for landslides is judged negligible in light of the prevailing gentle topography and the susceptibility for liquefaction was judged moderate based on maps compiled by the USGS. Consequently, the potential for landsliding, lateral spreading, liquefaction, or collapse appears to be low

to negligible. In addition to the low potential for landsliding, lateral spreading, or liquefaction, the General Plan goal and policies listed under Section VI.a above would ensure that any potential for geotechnical hazards be identified prior to construction, which may include the requirement for additional geotechnical investigations as deemed necessary by the County in order to make the determination that the Project site is safe to construct on. As such, the potential impacts associated with unstable geologic units or soils are considered less than significant. No mitigation measures are required and this issue will not be discussed further in the EIR.”

Given that the site of the proposed project is approximately 300 feet from the eroding bluffs at the edge of the Pacific Ocean and that the site is below the Tsunami inundation line, the potential impact of the direct physical changes resulting from the excavation of 4,300 cubic yards of the coastside and potential for landsliding and further erosion of the coastside by construction, heavy equipment, and operations is significant and should be addressed in the full EIR.

### **Hazards and Hazardous Materials**

The initial study checklist states that:

“Given that it is not anticipated that large quantities of the aforementioned materials would be permanently used or stored within the Project site, and with compliance with the above goals and policies, the use, storage, and/or disposal of hazardous materials would not result in a significant hazard to the public or environment. Further, because the Project is replacing the existing Fire Station 41 and not expected to increase operations above and beyond existing conditions, the overall impacts related to this threshold would therefore result in a less than significant impact. No mitigation measures are required and this issue will not be discussed further in the EIR.”

and

“Consequently, because operations of the Project would not be drastically different than those of the existing Fire Station 41 and compliance with General Plan goals and policies, and other federal and State laws related to the handling of hazardous materials, impacts would be less than significant. No mitigation measures are required and this issue will not be discussed further in the EIR.”

The claim that the “operations of the Project would not be drastically different than those of the existing Fire Station 41” and that the potential for hazards and hazardous materials would have less than a significant impact is patently false for two important reasons. First, the proposed project represents a more than doubling of the size of the facility (from 4,000 to 10,000 sq. ft.) and the ability and intent to accommodate additional fire engines. In addition, the rationale for the station is to be able serve the increasing needs and size of the population on the coastside. Thus, the proposed project clearly represents an increase in the activities, operations, hazardous emissions, and hazardous materials of the new station. Second, the site of the proposed project would place the new expanded station much closer to and within 500 feet of two elementary schools, including one school (Wilkinson School) that would be directly across the street (Coronado Road) from the proposed site.

Given that the proposed project includes an on-site diesel generator, a vehicle fueling station, and an above ground fuel storage tank for increased operations closer to schools and homes, the potential impact is significant and should be addressed in the full EIR.

### **Hydrology and Water Quality**

The initial study checklist only acknowledges one item (Place within a 100-year flood hazard area structures which would impede or redirect flood flows?) as having a potentially significant impact. The proposed project should also be considered to have a potentially significant impact on each the following items for the reasons detailed below.

- Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?
- Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?
- Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems?
- Otherwise substantially degrade water quality?

As acknowledged in the initial study checklist, “The proposed Project would disturb approximately 55,000 square feet (1.3 acres) and introduce approximately 33,850 square feet (0.7 acre) of impervious surface. Clearing, grading, excavation, and construction activities associated with the proposed Project have the potential to impact water quality through soil erosion and increasing the amount of silt and debris carried in runoff. Additionally, the use of construction materials such as fuels, solvents, and paints may present a risk to surface water quality. Finally, the refueling and parking of construction vehicles and other equipment on-site during construction may result in oil, grease, or related pollutant leaks and spills that may discharge into the storm drain system.” These activities are proposed to occur within and directly adjacent to a natural riparian habitat that contains a drainage area and within 100 feet of a stream that is designated as a sensitive coastal resource area. Thus, the proposed changes associated with the construction, the vast increase in impervious surface adjacent to sensitive habitat areas and the Pacific Ocean, and the long-term runoff of fuel, solvent, and other hazardous material residues associated with the proposed project represent a potentially significant impact and should be addressed as such in the full EIR.

- Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?
- Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?
- Inundation by seiche, tsunami, or mudflow?

As acknowledged in the initial study checklist, the site of the proposed project “is within the mapped area of a coastal base flood and future sea level rise of 55 inches” and “is within a mapped tsunami inundation zone.” In addition, the proposed project will include housing for the company of the fire station and will therefore place such housing within a flood hazard delineation map. Taken together, the proposed site will expose people and structures, namely the fire station itself and any items or people therein, to a significant risk of loss involving flooding and inundation by tsunami and other risks associated with its very close proximity to the eroding bluffs of the Pacific Ocean. As a result, each of these items should be addressed in the full EIR.

### **Land Use and Planning**

The initial study checklist states that:

“Construction of the Project would have a significant environmental impact if it would conflict with community goals as expressed in adopted plans, policies, or regulations. As previously stated, the Project site has Neighborhood Commercial Urban and Open Space with Park Overlay General Plan Land Use Designations...Therefore it is reasonable to assume if the Planning Commission makes the necessary findings for the Use Permit and Variance, that the proposed Project would, as conditioned, have a less-than-significant impact on the surrounding area. No mitigation measures are required and this issue will not be discussed further in the EIR.”

and

“The San Bruno Mountain Habitat Conservation Plan encompasses an area of approximately 3,600 acres near San Bruno Mountain located 20 miles north of the Project site and does not include areas in the vicinity of the Project site. No such plans have been adopted encompassing the project vicinity, no impacts are anticipated, and this criterion will not be discussed further in the EIR.”

The proposed project clearly conflicts with community goals as expressed in adopted plans, policies, and regulations. Specifically:

- The proposed project will be conducted within 100 feet of a sensitive coastal resource area and **is not** a principally-permitted use by the Coastal Commission
- The site of the proposed project is within the Coastal Zone of the El Granada Gateway District and a fire station **is not** a permitted use within the El Granada Gateway District under the zoning regulations
- The proposed project **is not** consistent with the development criteria and standards of the El Granada Gateway District. According to the zoning regulations, all new development must include a minimum of a 3.5 acre parcel, a 16-foot maximum building height, and a maximum 10% coverage of the parcel. The proposed project includes a 2.5 acre parcel, a building that is 30 feet in height (approximately double the allowed height), and a building that covers more than 10% of the parcel

Thus, the proposed project is neither consistent with the Land Use and Planning of the area nor with the stated community goals. As such, these items represent a potentially significant impact and should be addressed in the full EIR.

## **Noise**

The initial study checklist states that:

“In addition, given the close proximity of the Project site to the existing Fire Station 41, exposure to or generation of noise levels related to operations would be similar to existing conditions and would therefore not likely result in a substantial permanent increase beyond existing conditions. As such, this impact would be less than significant. No mitigation measures are required and this issue will not be discussed further in the EIR.”

and

“Noises associated with the operation of a fire station, such as fire alarms and emergency vehicle sirens, could temporarily and periodically elevate noise levels in areas with ambient noise levels that are in proximity to residential land uses; however, given the close proximity of the Project site to the existing Fire Station 41, increases in permanent ambient noise levels related to operations would be similar to existing conditions and would therefore not likely result in a substantial permanent increase beyond conditions that currently exist. As such, this impact would be less than significant. No mitigation measures are required and this issue will not be discussed further in the EIR.”

As described above, the proposed project clearly represents an expansion of the current size, scope, and operations from the current fire station and would place the new station closer to homes and schools. As a result, the generation of noise would not be similar to that of the existing location at these homes and schools, but rather would be significantly greater. In addition, the noise levels associated with the fire alarms and emergency vehicle sirens would be above allowable levels and would be constant and permanent in the sense that these noises would be expected to occur multiple times per hour at all hours of the day and night and they would be associated with the proposed project whose permanence is expected to last at least 50 years.

As such, the proposed project should also be considered to have a potentially significant impact on each the following items, which should be addressed in the full EIR.

- Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?
- A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?

## **Recreation**

The initial study checklist states that:

“the Project would not generate any demand for parks and recreational facilities above existing conditions. As such, there would be no impact with regards to use of existing parks and recreational facilities. No mitigation measures are required and this issue will not be discussed further in the EIR.”

As described and depicted below, the site of the proposed project is one of high traffic usage and congestion and overcrowding of the roadways, which includes parking along the sides of the local roads such as Obispo Road and Highway 1 for the sole purpose of enjoying the coastal parks and recreational facilities. The proposed project would displace these vehicles and there is no alternative solution provided within the scope of the plan to accommodate these displaced vehicles. As a result, it is very likely that parking along the sides of the road for recreational purposes will be displaced further into the neighborhood and the additional street parking within the neighborhood by individuals seeking to enjoy the parks and recreational facilities will have a potentially significant impact on the deterioration of the community and the environment. As such, the item of whether the project would increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated should be addressed in the full EIR.

### **Transportation and Circulation**

The initial study checklist states that:

“The proposed Project would not result in a change in the roadway network and would not result in congestion on roadways. The proposed Project would improve emergency response times to surrounding communities from this new location per a recent study conducted by Citygate Associates, LLC. The replacement station location is closer to the signaled intersection of Highway One and Coronado Street for superior access. Also the new location would have less potential conflicts with the existing neighborhood commercial traffic on Avenue Portola. No impact would occur. No mitigation measures are required and this issue will not be discussed further in the EIR.”

As described and depicted below, the site of the proposed project sits at a highly congested series of intersections along Coronado Street at Avenue Alhambra, Obispo Road, and Highway 1. In the pictures included below, one may see the type of congestion that is typical for this intersection. It is without question that the proposed project would exacerbate this congestion and overcrowding of the roadways as cars would have to attempt to pull off to the shoulder to accommodate large emergency vehicles and as cars parked on the shoulders of these roads would be displaced into other parts of the neighborhood. It is also false that the proposed site would result in any meaningful improvement in response times according to the Citygate Associates analysis or that there would be superior access to emergencies. The Citygate Associates analysis identified that the majority of emergencies attended to by Fire Station 41 are north of the current location. In addition, their analysis clearly describes the importance of the first 60-80 seconds of travel of a fire engine to not be through very narrow, congested streets. This means that at the proposed site that is located further south than the current location, fire engines would have to travel a longer distance either within the neighborhood on Obispo Road or Avenue Alhambra, or on Highway 1 along one of the most narrow and congested corridors in the area. In any case, congestion and emergency response times would be adversely impacted. It is practically certain that there would be

an impact on emergency access and this should be addressed as a potentially significant impact in the full EIR.

**Ways to prevent significant, avoidable damage to the environment by requiring changes in the proposed project through the use of an alternative site for the proposed project**

Under the California Code of Regulations, Guidelines for Implementation of the California Environmental Quality Act (CEQA), all phases of project planning, implementation, and operation must be considered in the initial study of the project. Specifically, Article 1 Section 15004 states that for public projects:

**“CEQA compliance should be completed prior to acquisition of a site for a public project”**

and

**“public agencies shall not undertake actions concerning the proposed public project that would have a significant adverse effect or limit the choice of alternatives or mitigation measures, before completion of CEQA compliance. For example, agencies shall not:**

**(A) Formally make a decision to proceed with the use of a site for facilities which would require CEQA review, regardless of whether the agency has made any final purchase of the site for these facilities, except that agencies may designate a preferred site for CEQA review and may enter into land acquisition agreements when the agency has conditioned the agency's future use of the site on CEQA compliance.**

**(B) Otherwise take any action which gives impetus to a planned or foreseeable project in a manner that forecloses alternatives or mitigation measures that would ordinarily be part of CEQA review of that public project.**

It is a fact that the Coastsides Fire Protection District has already purchased the proposed site consisting of 2.71 acres for \$845,000 from the San Mateo County Harbor District. In addition, the President of the Coastsides Fire Protection District Board of Directors, Gary Burke has stated on the record that he currently has it [the groundbreaking for the proposed fire station at this site] on his calendar (see Half Moon Bay Review article “Fire Board Explains Plans for El Granada Station” from the week of April 27, 2015). Thus, the Coastsides Fire Protection District is in violation of the law by failing to demonstrate CEQA compliance prior to the acquisition of a site for a public project and by undertaking actions concerning the proposed public project (i.e., purchasing the proposed site) that would have a significant adverse effect or limit the choice of alternatives or mitigation measures, before completion of CEQA compliance.

Under CEQA, the Coastside Fire Protection District may not lawfully make a decision to proceed with the use of a site for facilities which would require CEQA review, regardless of whether the agency has made any final purchase of the site for these facilities. CEQA allows for an agency to designate a preferred site for CEQA review and for an agency to enter into a land acquisition agreement when the agency has conditioned the agency's future use of the site on CEQA compliance; however, the law clearly prohibits the acquisition of this site by Coastside Fire Protection District for the proposed public project of replacing and expanding Fire Station 41 prior to completion of the EIR under CEQA. In addition, the law prohibits an agency from taking any action which gives impetus to a planned or foreseeable project in a manner that forecloses alternatives or mitigation measures that would ordinarily be part of CEQA review of that public project. In this regard, the purchase of the land bordered by Obispo Road, Portola Avenue, Avenue Alhambra, and Coronado Street by the Coastside Fire Protection District has served to foreclose alternatives to building the replacement fire station at that site and is a prohibited action under the law.

It is a fact that an independent analysis by Citygate Associates, LLC concluded that:

1. Fire stations should not be located in positions that require the first 60-80 seconds of travel to be through open space areas, or on very narrow, congested streets. Such situations waste response time coverage, or hamper it, as the responding unit cannot clear the immediate station area quickly enough to reach the outer edges of its assigned area in an appropriate amount of time
2. Most of the calls from an El Granada fire station would be heading north of the proposed site (based on data from current calls)
3. Factors to consider in selecting a site should take into account traffic access for fire trucks and impacts to neighbors
4. The corner of Hwy 1 and Capistrano (240 Capistrano Rd) or a second site on Hwy 1 (11820 Cabrillo) represent the "best fit" sites for a new expanded fire station

(see Citygate Associates, LLC Fire Station Relocation Study for the Coastside Fire Protection District; February 19, 2014).

It is a fact that the location for the proposed project on Obispo Road at Coronado Street is at one of the two egresses from the El Granada neighborhood and at a location that is characterized by very narrow, congested streets that would impede access for fire trucks and would hamper response times. The following pictures, taken on Saturday July 11, 2015, demonstrate the narrow streets and congestion that is typical of this area.





Coronado Street at the intersections of Highway 1 (foreground), Obispo Road (middle), and Avenue Alhambra (background): heavy traffic congestion is typical at each of these intersections.



Obispo Road facing northwest directly in front of the site of the proposed project (from the left and right sides of the road, respectively): note the narrow lanes, traffic congestion, cars parked on the shoulder, and lack of space for cars to yield to a fire truck.





Obispo Road at what would be the entry and exit points to the proposed fire station. This traffic would impede fire engine access or would be displaced onto Highway 1 and/or into the neighborhood.

## **Conclusions**

The proposed project is associated with numerous serious and potentially significant adverse impacts on the environment. Under the law, when an EIR identifies a significant effect, the government agency approving the project must make findings on whether the adverse environmental effects have been substantially reduced or if not, why not. A responsible agency may refuse to approve a project in order to avoid direct or indirect environmental effects of that part of the project which the responsible agency would be called on to carry out or approve. For reasons outlined in the initial study checklist and for those described above, San Mateo County should refuse to approve the proposed project and the Coastsides Fire Protection District should begin to work with the community to identify an appropriate site for a new fire station. It is clear that the currently proposed site, if approved, would have multiple significant adverse effects on the environment and that there are feasible alternatives to lessen or avoid the significant effects.

Specifically, the feasible alternative to meet the needs associated with an expanded fire station and increased operational capabilities includes withdrawing the currently proposed project from

consideration and changing the proposed project to be constructed at an alternative site that would meet the same needs of the Coastsides Fire Protection District with regard to response times and operational capabilities, while avoiding the numerous potentially significant adverse impacts that the currently proposed site entails and developing a lawful plan of action that includes true community engagement. To that end, we would be pleased to work together with the Coastsides Fire Protection District to achieve such a goal.

Thank you for this opportunity to provide our feedback on this proposed project.

Sincerely,

Lawrence Carter, Ph.D.

Beth Easter, J.D., Ph.D.

Cc: Don Horsley, San Mateo County Board of Supervisors  
Renée Ananda, Coastal Commission  
Richard Gordon, California State Assembly Member

----- Original message -----

From: Dan Haggerty <coastdemdan@gmail.com>

Date: 07/29/2015 12:43 PM (GMT-08:00)

To: "Cole, Paul@CALFIRE" <Paul.Cole@fire.ca.gov>

Subject: Granada Station 41 Replacement Project EIR

Dear Chief Cole,

re: Granada Station 41 Replacement Project EIR (Please include this in the EIR report)

I just received the Coastal Commission Letter stating: your proposed site presents inconsistencies with the requirements of the certified Local Coastal Plan. Above all the proposed project raises concerns as it may potentially conflict with the need to relocate Highway 1 further inland in order to protect coastal access in this area. We encourage Coastside Fire Protection to identify alternative sites for a new fire station...

Therefore, I want to urge you to consider the alternate site of Mirada East, know as the upland area of Mirada Surf East located on County owned property. I think it would be an ideal location for the new Fire Station, up hill with a private road, away from residences, traffic and the public. If properly located and noise responsibly controlled, I can't imagine anyone objecting to this site, which would be a great accomplishment for our Community.

That would make it a win, win for all. You would need to contact the County to discuss the best site for the building.

Also, the possibility of looking at eminent domain of the old Comcast building, but this may have the same problems with the CCC.

Please know that I will support the process as I truly do want a best solution for all involved.

Thank you for your consideration,

Dan Haggerty, El Granada

**From:** Fran Pollard <LPFP@comcast.net>  
**Date:** Wednesday, July 29, 2015 2:26 PM  
**To:** Paul Cole <Paul.Cole@fire.ca.gov>  
**Subject:** Granada Station 41 Replacement Project EIR

Fran Pollard  
PO Box 832  
El Granada, CA 94018  
**LPFP@comcast.net**

July 28, 2015

Paul Cole, Assistant Chief  
Coastside Fire Protection District  
Half Moon Bay, CA 94019

re: Granada Station 41 Replacement Project EIR      (Please include this in the EIR report)

Dear Chief Cole,

First, I want to thank you and all the hard working Firemen of Cal Fire. We truly appreciate all your dedication and really want to keep you here in El Granada. However, as you know from the start, there has been much disagreement from the Community concerning the use of one of our last dedicated Community Parcels, part of "The Granada Gateway."

I just received the Coastal Commission Letter stating: your proposed site presents inconsistencies with the requirements of the certified Local Coastal Plan. The letter points out many conflicts with the LCP and the Community.

It ends with: We encourage Coastside Fire Protection to identify alternative sites for a new fire station...

Therefore, I want to urge you to consider the alternate site I spoke to you about last week, known as the upland area of Mirada Surf East located on County owned property. I think it would be an ideal location for the new Fire Station, up hill with a private road, away from residences, traffic and the public. If properly located, I can't imagine anyone objecting to this site, which would be a great accomplishment for our Community.

That would make it a win, win for all. You would need to contact County Parks to discuss the best site for the building.

I already contacted them about it, as an alternate site for the new Fire Station.

Once again, I urge you to consider this as an alternate site.

Thank you for your consideration,

/ Fran Pollard, El Granada







## GRANADA COMMUNITY SERVICES DISTRICT

*Board of Directors*

*Matthew Clark, President*

*Jim Blanchard, Vice-President*

*Leonard Woren, Director*

*Ric Lohman, Director*

*David Seaton, Director*

October 21, 2016

Assistant Chief Paul Cole  
Coastside Fire Protection District  
1191 Main Street  
Half Moon Bay, CA 94019

**Re: Notice and Request for Coordination Regarding the Need for Coastside Fire Protection District to Accord the Granada Community Services District Responsible Agency Status in Relation to Its Fire Station 41 Replacement Project**

Dear Assistant Chief Cole:

This letter is in regards to the July 16, 2015 Initial Study and Notice of Preparation of an Environmental Impact Report by Coastside Fire Protection District (CFPD) for its proposed Fire Station 41 Replacement Project (Project). That Initial Study does not identify Granada Community Services District GCSD as a "Responsible Agency" as defined by CEQA. Nor has CFPD yet commenced according GCSD Responsible Agency status, as required by CEQA Guidelines. GCSD is ready, willing and able to work with CFPD to remedy this situation as much as possible.

GCSD is responsible for the sewage collection system and the garbage and recycling services within El Granada, where CFPD has proposed to locate its new fire station. CEQA Guideline 15381 defines "responsible agencies" as "all public agencies other than the lead agency which have discretionary approval power over the project." As further discussed below, GCSD has three separate discretionary approvals that CFPD must obtain as part of the Project. Thus, GCSD is a Responsible Agency under CEQA. GCSD requests that, at a minimum, CFPD begin conferring with GCSD as soon as possible in the planning process to ensure it adequately and fully considers Project-related environmental impacts that fall within GCSD's jurisdiction and special expertise.

On July 16, 2015 CFPD issued its Initial Study and Notice of Preparation of an Environmental Impact Report. In its Initial Study, CFPD identified itself as the Lead Agency for purposes of its CEQA Project review, and named the County of San Mateo as a Responsible Agency. However, CFPD neither named GCSD as a Responsible Agency nor consulted with GCSD in the manner set forth in the CEQA Guidelines.

CEQA Guideline 15063(g), provides:

"[a]s soon as a lead agency has determined that an initial study will be required for the project, the lead agency shall consult informally with all responsible agencies ... to obtain the recommendations of those agencies as to whether an EIR or a negative declaration should be prepared."



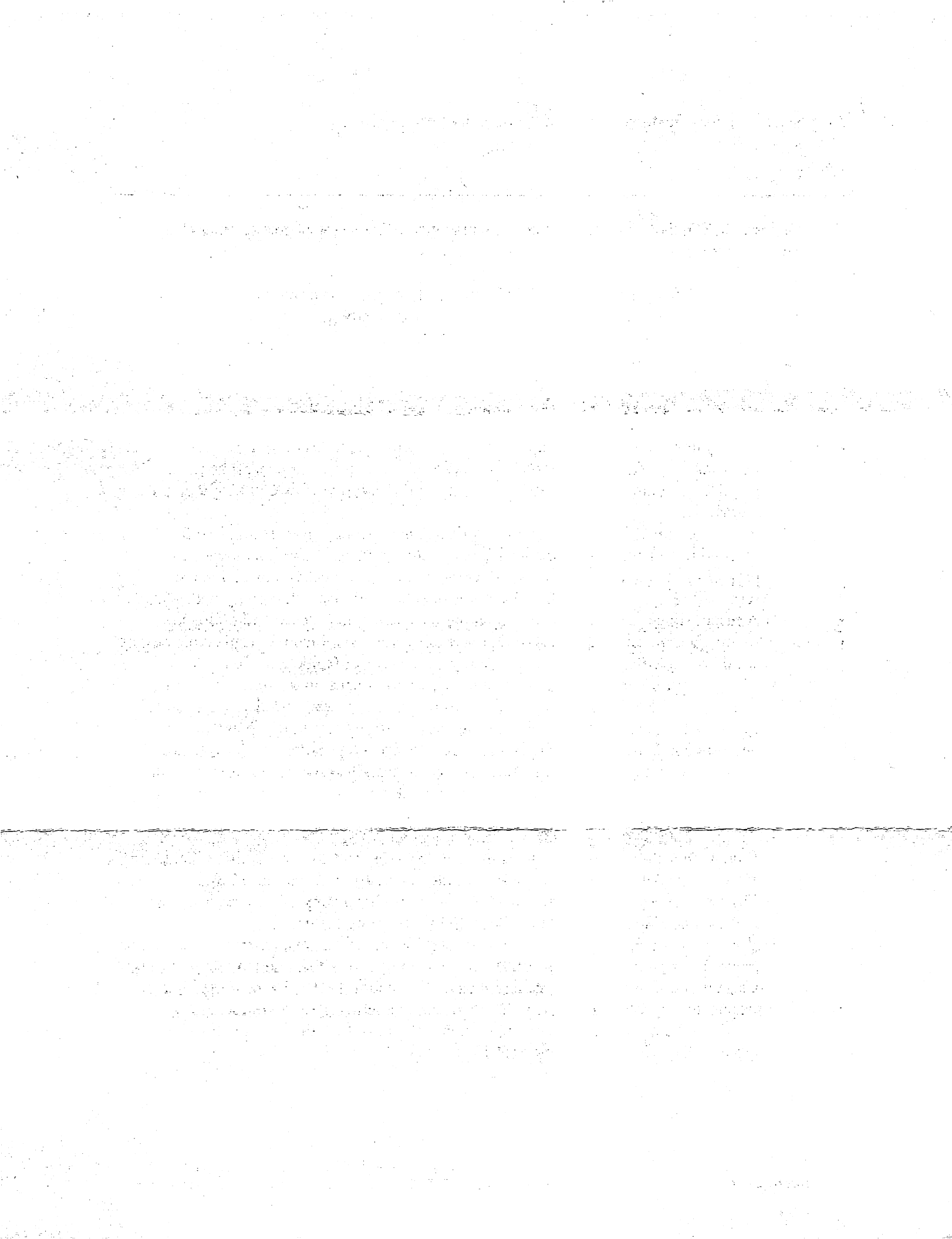


Nevertheless, GCSD, though not consulted, concurs with CFPD's conclusion that an EIR is required to be prepared.

Looking forward, GCSD requests that CFPD immediately begin consulting with GCSD to ensure that each agency can adequately carry out its procedural responsibilities under CEQA and that Project-related impacts that fall within GCSD's jurisdiction and realm of expertise as a Responsible Agency are fully evaluated.

CEQA provides, in part, as follows as to a Responsible Agency:

- (1) A responsible agency may require changes in a project to lessen or avoid the environmental effects, either direct or indirect, but only of that part of the project which the agency will be called on to carry out or approve. See CEQA Guideline 15041.
- (2) As set forth in CEQA Guideline 15096(b), a responsible agency is required to respond to consultation by the lead agency in order to assist the lead agency in preparing adequate environmental documents for the project and to enable the responsible agency to ensure that the documents it will use will comply with CEQA.
- (3) A responsible agency may refuse to approve a project in order to avoid direct or indirect environmental effects of that part of the project which the responsible agency would be called on to carry out or approve. See CEQA Guideline 15042.
- (4) The lead agency shall consult with and request comments on the draft EIR from responsible agencies. Prior to the close of the public review period, a responsible agency which has identified what that agency considers to be significant environmental effects shall advise the lead agency of those effects. As to those effects relevant to its decision, if any, on the project, the responsible agency shall either submit to the lead agency complete and detailed performance objectives for mitigation measures addressing those effects or refer the lead agency to appropriate, readily available guidelines or reference documents concerning mitigation measures. If the responsible agency is not aware of mitigation measures that address identified effects, the responsible agency shall so state. See CEQA Guideline 15086.
- (5) The lead agency shall require the applicant to provide a copy of the certified, final EIR to each responsible agency. See CEQA Guideline 15095.
- (6) When a final EIR identifies one or more significant effects, responsible agencies must make findings under Section 15091 for each significant effect and may need to make a statement of overriding considerations under Section 15093 for the project. Each responsible agency must certify that its decision making body reviewed and considered the information contained in the EIR prior to acting on or approving the project. See CEQA Guidelines 15050(b), 15064(a)(2).



Upon reviewing CFPD's Initial Study, GCSD has identified three Project-related approvals, as listed below.

#### **CFPD Must Obtain a Sewer Service Variance from GCSD**

Because Measure A, adopted by the voters in 1986, precludes GCSD from constructing sewer infrastructure capacity exceeding that necessary to serve Local Coastal Plan ("LCP") build-out and CFPD's parcel is substandard as to the minimum parcel size, CFPD will need to obtain a sewer service variance from GCSD prior to obtaining a Sewer Connection Permit.

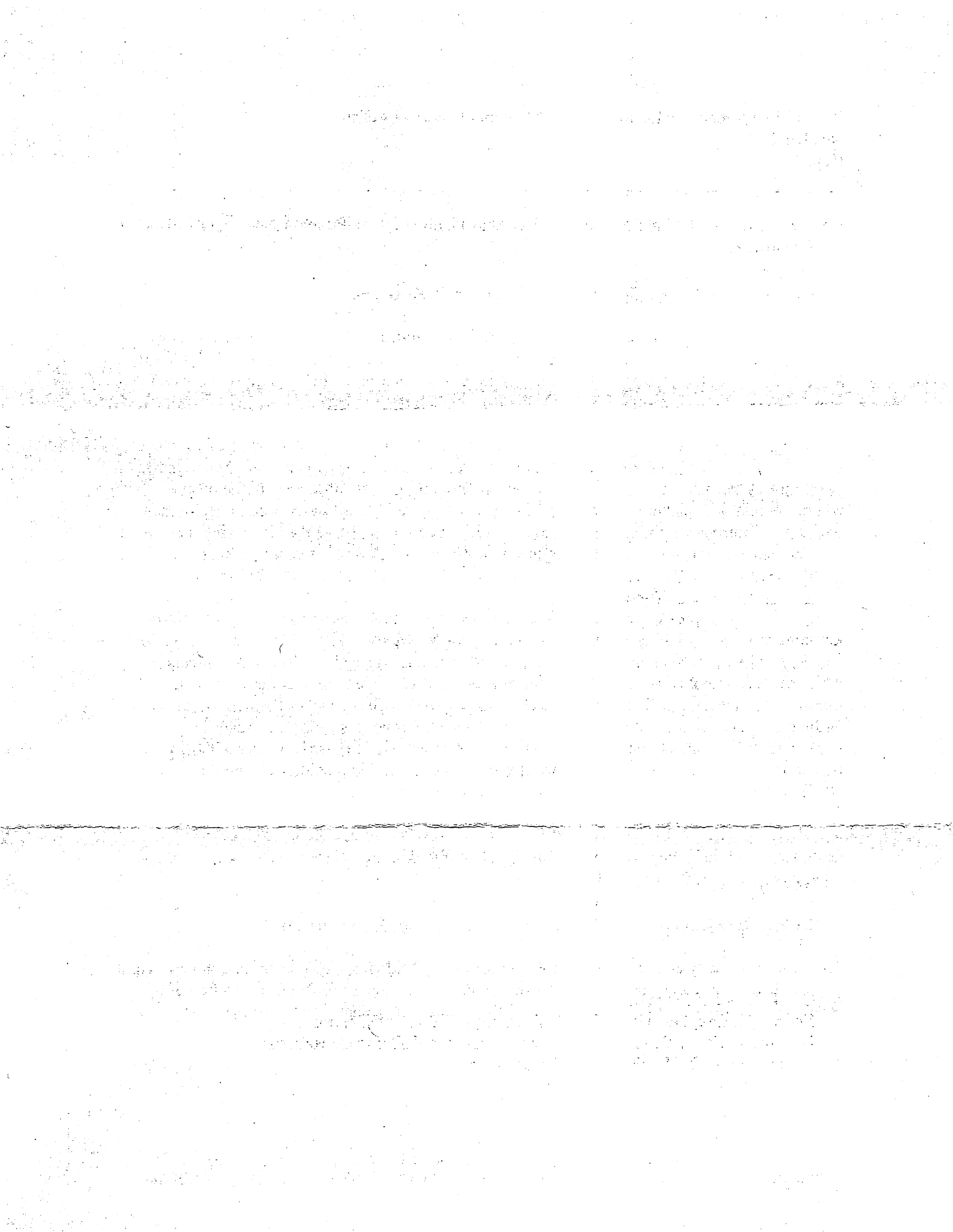
CFPD has proposed to construct a new fire station on a 2.7-acre parcel, 2.37 acres of which are currently zoned "EG" to allow low-intensity uses on minimum 3.5-acre parcels. According to the County's Mid-Coast LCP (which includes as an implementing ordinance in the county zoning regulations), the purpose of the EG district is to provide for low-intensity development within the "Burnham Strip" of El Granada, which is meant to preserve the visual and open space characteristics of this property. The County's Mid-Coast LCP lists this parcel as open space with a park overlay.

Because CFPD proposes to build a full-service fire station on a substandard parcel zoned for low-intensity uses, it will constitute development not included in the LCP build-out calculations and contribute to the ever-increasing sewer service demand caused by substandard parcels for which GCSD cannot construct infrastructure capacity if it is to remain in compliance with Measure A. As a result, GCSD must review this proposal under its Sewer Service Variance Ordinance procedures enacted in 2001 to assist it in addressing this problem. According to section 603(03) of the Granada Sanitary District Ordinance Code (District Code), GCSD may issue a variance for a substandard (nonconforming) parcel based on evidence submitted to the GCSD District Board (Board), but only if that evidence supports the Board making specified findings set forth in the District Code.

GCSD staff would be happy to meet with CFPD staff to discuss a Variance Application and its relationship to CFPD's proposed EIR.

#### **CFPD Must Obtain a Rural Zone Sewer Connection Determination**

The Project property is designated "rural" in the County Mid-Coast LCP even though it is a rural island inside an area designated urban in the County LCP. Under District Code section 500, enacted to comply with LCP Policy 2.14, GCSD has established an Urban Service Zone and a



Rural Service Zone and included the Project property in its Rural Service Zone. GCSD can only issue a permit for a service provided in its Rural Service Zone if that service is "commensurate" with the uses and densities designated in the County LCP for the property in question.

Thus, prior to issuing a Sewer Connection Permit to CFPD, GCSD must make a Rural Zone connection determination finding that a Sewer Connection Permit for the Project is commensurate with the uses and densities designated in the Mid-Coast LCP. Again, GCSD staff would be happy to meet with you to discuss this Rural Zone Connection Determination process and its relationship to CFPD's proposed EIR.

### **CFPD Must Obtain a Sewer Connection Permit**

Finally, CFPD must obtain a Sewer Connection Permit as part of its proposed Project. GCSD permits are divided into three classes. Class 1 permits are required for residential connections; Class 2 for commercial, industrial, or institutional; and Class 3 for construction of sewer mains, pumping stations, etcetera. CFPD will have to obtain a Class 2 and, possibly, a Class 3 permit from GCSD. Sewer Connection Permits can only be issued after a Variance Approval and a Rural Zone Connection Determination.

### **Conclusion**

GCSD requests that CFPD accord GCSD Responsible Agency status as early as possible. If you have any questions, please contact GCSD General Manager Chuck Duffy using the contact information provided below.

Very truly yours,



Chuck Duffy, General Manager  
Granada Community Services District  
P.O. Box 335  
El Granada, CA 94018  
[cduffy@granada.ca.gov](mailto:cduffy@granada.ca.gov)  
760.479.4125

cc: GCSD Board of Directors

Dennis Aguirre, San Mateo County Planning and Building Department  
Summer Burlison, San Mateo County Planning and Building Department  
Renee Anada, California Coastal Commission