

**COUNTY OF SAN MATEO  
PLANNING AND BUILDING DEPARTMENT**

**DATE:** January 11, 2017

**TO:** Planning Commission

**FROM:** Planning Staff

**SUBJECT:** EXECUTIVE SUMMARY: Introduction of a Draft Environmental Impact Report (EIR), pursuant to the California Environmental Quality Act (CEQA), conducted during the 45-day public review period, for the Coastside Fire Protection District's proposed Fire Station 41 (El Granada) Replacement Project at the corner of Obispo Road and Coronado Street in the unincorporated area of El Granada. The Coastside Fire Protection District is acting as lead agency with the County of San Mateo as a responsible agency, pursuant to Sections 15051 and 15381 of CEQA.

County File Number: PLN 2016-00346 (Coastside Fire Protection District)

**PROPOSAL**

The Coastside Fire Protection District (Lead Agency) and its consultants have completed a Draft Environmental Impact Report (EIR) analyzing potential impacts of the Fire Station 41 (El Granada) Replacement Project and are seeking public and agency comments during a public review period starting on Friday, December 2, 2016 and ending at 5:00 p.m. on Thursday, January 19, 2017. The County of San Mateo is acting as a responsible agency, pursuant to Section 15381 of the California Environmental Quality Act (CEQA).

**Project Description**

The Coastside Fire Protection District (CFPD) is proposing to construct a new Fire Station 41 (El Granada) that includes a new 12,425 sq. ft. single-story, three-apparatus bay fire station on a legal, undeveloped 2.7-acre split-zoned parcel (APN 047-261-030) at the corner of Obispo Road and Coronado Street in El Granada. The proposed development will involve 10,310 cubic yards (c.y.) of grading (including 10,150 c.y. of cut and 160 c.y. of fill) and the removal of 10 non-native trees.

CFPD is also proposing a minor subdivision to divide the project site into two parcels, one for each zoning district on the property. Parcel A, consisting of the westernmost 0.31-acre portion of the site, is zoned C-1/S-3/DR/CD (Neighborhood Business / 5,000 sq. ft. lot minimum / Design Review / Coastal Development) and is not proposed for development. Parcel B, consisting of the remaining 2.38-acre portion of the site, is

zoned EG/DR/CD (El Granada Gateway / Design Review / Coastal Development) and would accommodate the proposed new Fire Station 41.

## **RECOMMENDATION**

Receive staff and applicant presentations on the Draft EIR prepared by the Coastsides Fire Protection District (CFPD) during the 45-day public comment period for the CFPD's proposed Fire Station 41 (El Granada) Replacement Project in the unincorporated area of El Granada. The public comment period runs from December 2, 2016 through 5:00 p.m. on January 19, 2017.

## **SUMMARY**

The Coastsides Fire Protection District (CFPD) is acting as Lead Agency for purposes of CEQA, with the County of San Mateo as Responsible Agency. According to the CEQA Guidelines, the "Lead Agency" is the public agency which has the principal responsibility for carrying out or approving a project while "Responsible Agencies" are all public agencies, other than the Lead Agency, which has discretionary approval power over a project. As Lead Agency, the CFPD has obtained the consulting services of Placeworks to prepare the Draft EIR. CFPD's Board of Directors is the decision-making body for certifying the Final EIR. As a decision-making body of the County of San Mateo (i.e., Responsible Agency), the Planning Commission will be required to certify that prior to reaching a decision on the project, it has reviewed and considered the environmental effects contained in the Lead Agency's certified EIR.

The Draft EIR identifies several potentially significant impacts generated by the proposed project in the areas of Aesthetics, Air Quality, Biological Resources, Hydrology and Water Quality, Noise, and Transportation and Circulation. Based on the Draft EIR's analysis for each of these topics, it has been determined that the proposed project will create a significant impact to Air Quality and Biological Resources. The Draft EIR identifies recommended mitigation measures including compliance with the Bay Area Air Quality Management District's Best Management Practices for construction emission reduction to minimize regional and localized construction emissions to a less than significant level. Additionally, the Draft EIR recommends pre-construction surveys, wildlife exclusion fencing, biological monitoring, and use of appropriate erosion control materials to mitigate any potential significant impacts to the California red-legged frog, San Francisco garter snake, or migratory birds to a less than significant level.

The CFPD will conduct a public hearing on the Draft EIR on Wednesday, January 18, 2017 at 6:00 p.m., at the Station 41 Board Room, 1191 Main Street, Half Moon Bay, California, 94019. An electronic copy of the Draft EIR (with Appendices) is available online at <http://www.coastsidefire.org/firestation41>.

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**Project Description**

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The new fire station will replace the existing 4,000 sq. ft. Fire Station 41 that is located at 531 Obispo Road in El Granada, approximately 600 feet northwest of the project site. The project will involve development of approximately 1-acre of the 2.7-acre parcel to include the new fire station building (at the southeast portion of the parcel, nearest the Obispo Road and Coronado Street intersection), on-site parking, drought-tolerant landscaping, and a new curb, gutter and sidewalk along the frontage of the proposed fire station.

CFPD is also proposing a minor subdivision to divide the project site into two parcels, one for each zoning district on the property. Parcel A, consisting of the westernmost 0.31-acre portion of the site, is zoned C-1/S-3/DR/CD (Neighborhood Business / 5,000 sq. ft. lot minimum / Design Review / Coastal Development) and is not proposed for development. Parcel B, consisting of the remaining 2.38-acre portion of the site, is zoned EG/DR/CD (El Granada Gateway / Design Review / Coastal Development) and would accommodate the proposed new Fire Station 41.

The proposed development will involve 10,310 cubic yards (c.y.) of grading (including 10,150 c.y. of cut and 160 c.y. of fill) and the removal of 10 trees consisting of 6 Monterey pine (*pinus radiata*), 1 blue gum (*eucalyptus globulus*), 1 acacia (*acacia longifolia*), and 2 black acacia (*acacia melanoxylon*), of which 4 are considered “Significant Trees” under the County’s Significant Tree Ordinance with a circumference of 38 inches in circumference or more. One of the 4 significant trees, a Monterey pine, was reported by Kiely Arborist Services, LLC as dead.

The CFPD has filed applications to the County for a Coastal Development Permit (appealable to the California Coastal Commission), Minor Subdivision, Use Permit (to allow a fire station within the “EG” zoning district), Design Review, Variance (for setbacks, height, and lot coverage), and Grading Permit, PLN 2016-00346. As part of the County’s permitting process, the project will require consideration by the Midcoast Community Council and at least one public hearing before the San Mateo County Planning Commission. Prior to a decision by the Planning Commission for the above stated permits, the CFPD’s Board of Directors must certify the EIR.

### **Background**

The Coastsides Fire Protection District (CFPD), as lead agency pursuant to Section 15051 of the California Environmental Quality Act (CEQA), and its consultants prepared and circulated an Initial Study and Notice of Preparation of an Environmental Impact Report (EIR) for the proposed project on June 30, 2015. During the 30-day public review period for the Initial Study, the CFPD held a scoping meeting and public workshop on July 16, 2015 to solicit comments on the scope and content of the EIR. The County combined its required Pre-Application Public Workshop with the CFPD’s scoping meeting and public workshop.

### **RECOMMENDATION**

Receive staff and applicant presentations on the Draft EIR prepared by the Coastsides Fire Protection District (CFPD) during the 45-day public comment period for the CFPD’s proposed Fire Station 41 (El Granada) Replacement Project in the unincorporated area of El Granada. The public comment period runs from December 2, 2016 through 5:00 p.m. on January 19, 2017.

## **BACKGROUND**

Report Prepared By: Summer Burlison, Project Planner; 650/363-1815

Owner/Applicant: Coastsides Fire Protection District

Location: Obispo Road at Coronado Street, El Granada

APN: 047-261-030

Parcel Size: 2.7 acres

Existing Zoning: EG/DR/CD (El Granada Gateway/Design Review/Coastal Development) and C-1/S-3/DR/CD (Neighborhood Business/5,000 sq. ft. lot minimum/Design Review/Coastal Development)

General Plan Designation: Open Space with Park Overlay and Neighborhood Commercial, respectively

Sphere-of-Influence: City of Half Moon Bay

Existing Land Use: Undeveloped

Water Supply: The project will require water service from the Coastsides County Water District (CCWD). According to letters issued by the CCWD, dated August 31, 2016, the proposed project may require a water main line extension as the nearest available water main is in Avenue Portola. Additionally, the CFPD will need to acquire sufficient water capacity (via purchase or transfer) for the project as there are no installed or uninstalled water service connections to the subject parcel.

Sewage Disposal: The project will require sewer service from the Granada Community Services District (GCSD). According to a letter issued by the GCSD, dated October 21, 2016, the proposed project may require a Sewer Service Variance, a Rural Zone Sewer Connection Determination, and a Sewer Connection Permit from the GCSD.

Flood Zone: Zone X (area of minimal flood), FEMA Community Panel 06081C0140E and 06081C0138E, effective October 16, 2012

Setting: The project parcel is a narrow, oblong-shaped undeveloped 2.7-acre parcel located east of Cabrillo Highway (State Route 1) in the unincorporated community of El Granada. The parcel is bounded by Avenue Alhambra to the north, Coronado Street to the east, Obispo Road to the south, and Avenue Portola to the west. The property has an average downward slope of 15% toward the coast. Just west of the center of the parcel is a drainage channel surrounded by dense riparian vegetation approximately 200 feet in width, according to a Riparian Setback Analysis completed by TRA Environmental Sciences, Inc., dated August 7, 2014. The proposed project will occur on the eastern portion of the project parcel which consists of ruderal uplands dominated by weedy vegetation, pursuant to a Preliminary Environmentally Sensitive Habitat Areas

Assessment completed by WRA Environmental Consultants dated April 16, 2015. A total of 10 non-native trees including Monterey pine, blue gum eucalyptus, and acacia trees are in the project area and are proposed for removal to accommodate the proposed development.

Surrounding land uses include single- and multi-family residential uses to the north; the Wilkinson School (private K-8) to the east (across Coronado Street); commercial uses to the west (across Avenue Portola); and undeveloped land to the south (across Obispo Road), of which a portion is used for informal beach parking.

#### Chronology:

<u>Date</u>	<u>Action</u>
July 15, 2015	- Combined County Pre-Application Public Workshop, PRE 2015-00029, and Coastside Fire Protection District (CFPD) Environmental Impact Report (EIR) Scoping Meeting held at the El Granada Elementary School.
August 19, 2015	- Recordation of a Certificate of Compliance, Type A, PLN 2015-00019, legalizing the project parcel (APN 047-261-030).
August 16, 2016	- Coastal Development Permit (CDP), Minor Subdivision, Use Permit, Design Review, Variance, and Grading Permit applications filed with the County.
December 2, 2016	- Draft EIR issued by the CFPD commencing a 45-day public review period starting December 2, 2016 and ending at 5:00 p.m. on January 19, 2017.
January 11, 2017	- Planning Commission hearing to introduce the CFPD's Draft EIR during the 45-day public review period; informational item only.
January 18, 2017	- CFPD Board hearing on the Draft EIR to be held at the CFPD Station 41 Board Room in Half Moon Bay.
TBD	- CFPD Board hearing to certify the Final EIR.
TBD	- PC Hearing of a submitted planning permit application.

## **DISCUSSION**

### **A. RESPONSIBLE AGENCY ROLE**

The Coastside Fire Protection District (CFPD) is acting as Lead Agency for purposes of CEQA, with the County of San Mateo as a Responsible Agency, pursuant to Sections 15051 and 15381 of the CEQA Guidelines. Section 15367 of the CEQA Guidelines defines a “Lead Agency” as a public agency which has the principal responsibility for carrying out or approving a project. As Lead Agency, the CFPD has obtained the consulting services of Placeworks to prepare the Draft EIR. CFPD’s Board of Directors is the decision-making body for certifying the Final EIR.

CEQA Guidelines Section 15381 defines “Responsible Agencies” as all public agencies other than the Lead Agency which have discretionary approval power over a project. Pursuant to Section 15050 of the CEQA Guidelines, the decision-making body of each Responsible Agency (i.e., the County of San Mateo Planning Commission, referred to as “County” hereinafter) must certify that prior to reaching a decision on the project it has reviewed and considered the environmental effects contained in the Lead Agency’s certified EIR.

#### **Draft EIR**

CEQA Guidelines Section 15096(d) advises that the County, as a Responsible Agency, should review and comment on the Draft EIR with respect to any shortcomings in the document, and any additional alternatives or mitigation measures that should be included in the Final EIR. The County’s comments must be limited to those project activities which are within the County’s area of expertise, or which are required to be carried out, or approved by the County, or which will be subject to the exercise of powers by the County. Any comments by a Responsible Agency must be specific and supported by oral or written documentation.

#### **Project Decision**

As a Responsible Agency, the County has limited responsibility in mitigating or avoiding direct or indirect environmental effects to only those parts of a project for which the County decides to approve. The County shall not approve the project if it finds any feasible alternative or feasible mitigation measures within its powers that would substantially lessen or avoid any significant effect on the environment.

In rendering a decision on a project for which an EIR has been certified, the County cannot approve the project unless it finds that each identified significant effect will be mitigated to a less than significant effect per the certified EIR; mitigation necessary to reduce a significant effect to a less than significant effect are within the jurisdiction and responsibility of another public agency and have been adopted by such other agency, or can and should be adopted by such other agency; or that specific economic, legal, social, technological, or other

considerations, including employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the certified EIR.

## B. SUMMARY OF PROJECT IMPACTS

The Draft EIR prepared by Placeworks, the environmental consultant retained by the Coastside Fire Protection District (CFPD) as Lead Agency for purposes of CEQA, identifies several potentially significant impacts generated by the proposed Fire Station 41 Replacement Project, in the following areas:

- Aesthetics
- Air Quality
- Biological Resources
- Hydrology and Water Quality
- Noise
- Transportation and Circulation

The Draft EIR concludes that all potentially significant impacts can be reduced to less than significant impacts with the implementation of the mitigation measures recommended throughout the document. Table 2-1 from the Executive Summary of the Draft EIR, which summarizes the identified potential impacts and proposed mitigation measures, has been included as Attachment D to this staff report.

Aesthetics. The Draft EIR concludes that the proposed project would have a less than significant impact on scenic vistas, would not significantly degrade the existing visual character or quality of the site or its surroundings, and would not create a new significant source of light or glare that would adversely affect day or nighttime views in the area. The Draft EIR describes that the maximum height of the proposed building would be 30 ft. to its highest point at the center of the bay in order to accommodate the fire apparatus. The remaining building would be 17 ft. in height and sited such that existing topography would help to minimize the project's impact on surrounding public views. The Draft EIR concludes that the design, siting, and existing topography would minimize any potential significant adverse visual impacts. Photo simulations were prepared and included in Figures 4.1-1 through 4.1-3 of the Draft EIR to help illustrate this conclusion.

Air Quality. The Draft EIR identifies that fugitive dust (PM10) generated during ground-disturbing construction activities has the potential to generate substantial construction-related exhaust emissions from on-site construction equipment and vehicle trips. Additionally, the Draft EIR identifies that sensitive receptors, including nearby single- and multiple-family residences and the Wilkinson School (K-8) and El Granada Elementary School (K-5), could be exposed to substantial



concentrations of localized construction emissions. A construction Health Risk Assessment of toxic air contaminants (TACs) and fine particulate matter (PM<sub>2.5</sub>) was completed and included in Appendix D of the Draft EIR (see Attachment C of the staff report for availability of the Draft EIR with Appendices). To reduce the potential construction-related air pollution impacts to the area, including residential and school-based receptors, mitigation measures are being recommended that would require adherence to the Bay Area Air Quality Management District's (BAAQMD) Best Management Practices for reducing such construction emissions and use of appropriate equipment such as Level 3 Diesel Particulate Filters and engines that meet the USEPA Certified Tier 3 emission standards for all equipment with 25 horsepower or more. The Draft EIR concludes that the proposed mitigation measures would reduce both regional and localized construction emissions from exceeding the BAAQMD's thresholds of significance and thereby reducing any potential air quality impacts generated by the project to a less than significant level.

Biological Resources. The Draft EIR indicates that, while highly unlikely due to the absence of suitable habitat for California red-legged frog (CRLF) or San Francisco garter snake (SFGS) on the project site, there is a remote potential for individual CRLF or SFGS to disperse onto the site in the future and thereby be injured or killed during construction. Given the special-status listings of these species, any inadvertent take of CRLF or SFGS would be considered a significant impact. Additionally, nesting raptors or birds are protected under the Migratory Bird Treaty Act. Proposed tree and vegetation removal, and other construction-related activity, during the breeding season could result in the inadvertent loss of bird nests in active use, which would be considered a significant impact. The Draft EIR concludes that pre-construction surveys, wildlife exclusion fencing, biological monitoring, and use of appropriate erosion control materials would mitigate any potential impacts to CRLF, SFGS, or migratory birds to a less than significant level.

Additionally, the Draft EIR indicates that the proposed project would not have any significant impacts to the riparian habitat identified around the drainage channel that runs slightly west through the center of the parcel as proposed grading, construction, and improvements related to the project would not encroach into the 50-ft. buffer zone from the edge of delineated riparian habitat. Furthermore, the Draft EIR concludes that the proposed tree removal, consisting of the removal of (ten) 10 non-native trees scattered throughout the project area, would not be a significant loss as the trees were assessed by Kielty Arborist Services, LLC and determined to be in declining health (ranging from good to poor condition) with poor form, poor vigor, failed leaders and limbs, bark beetle, and pine pitch canker. Additionally, only four (4)<sup>1</sup> of the trees proposed for removal are considered significant pursuant to the County's Significant Tree Ordinance and the proposed project includes new tree plantings at over a 5:1 ratio (for the significant trees

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<sup>1</sup> One of the four trees was confirmed to be dead by Kielty Arborist Services, LLC. Dead trees do not require a permit to be removed and are not subject to replacement plantings.

proposed for removal). Therefore, the Draft EIR considers the proposed tree removal to have a less than significant impact on the environment.

Hydrology and Water Quality. The Draft EIR analyzes the proposed project relative to flooding, tsunami, and sea level rise hazards. The project site is within Flood Zone X (area of minimal flood). Therefore, the project would not place structures within a 100-year floodplain that could impede or redirect flows.

The Draft EIR concludes that the proposed project's impacts from sea level rise are also less than significant, despite the project being within the mapped area subject to coastal flooding with future sea level rise, pursuant to the Pacific Institute's 2009 mapping of the extent of potential flooding associated with a 100-year coastal flood event combined with a sea level rise scenario of 55 inches. The Draft EIR relies on inundation mapping associated with the County's Sea Level Rise Vulnerability Assessment (Sea Change San Mateo County) which indicates that the proposed project site would not be impacted by sea level rise under a 100-year storm surge with 6.6 feet of sea level rise. The Draft EIR also cites that the National Oceanic and Atmospheric Administration's (NOAA) sea level rise map also shows that the project site would not be impacted by a projected sea level rise of 6 feet by the year 2100.

The Draft EIR concludes that the project's impacts relative to tsunami inundation are less than significant based on a site specific tsunami assessment completed by Moffat & Nichol for the project site, included as Appendix E of the Draft EIR (see Attachment C). As explained in the Draft EIR, the project site is located just within the upland limit of the tsunami inundation zone shown on the California Emergency Management Agency (Cal-EMA)<sup>2</sup> 2009 Tsunami Inundation Map for Emergency Planning. The Draft EIR notes that the Cal-EMA map states that it "is intended for local jurisdictional, coastal evacuation planning uses only" and that communication with a Senior Engineering Geologist and Coordinator for the State of California Tsunami Preparedness and Hazard Mitigation Program (Cal-OES) confirmed that the map is primarily for evacuation planning and was not developed specifically for land use planning purposes.

Instead, the Draft EIR relies on the 2013 Science Application for Risk Reduction (SAFRR) map which was developed by the United States Geological Service (USGS) in collaboration with NOAA, the California Geological Services (CGS), and Cal-OES as part of the SAFRR tsunami study. The SAFRR map evaluates a single, hypothetical event generated by a 9.1 magnitude earthquake off the Pacific Coast of the Alaska Peninsula, which is the region of Alaska that poses the greatest threat to the California coastline. Based on the SAFRR map, the project site is well outside of the tsunami inundation zone as the inundation line does not extend as far inland as the Cal-EMA map. Furthermore, the Draft EIR explains that the Moffat & Nichol site specific study included evaluation of the potential for

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<sup>2</sup> The California Emergency Management Agency (Cal-EMA) is now the California Office of Emergency Services (Cal-OES). The Draft EIR refers to the agency as Cal-EMA.

sea level rise in combination with a tsunami event and concluded that such an event would not result in inundation of the proposed fire station.

Noise. The Draft EIR identifies that the proposed project, including construction and grading work, would not generate significant vibration or architectural damage to nearby structures given the short intermittent and variable use of construction equipment. Additionally, the Draft EIR indicates that temporary increases in ambient noise levels during project construction would be greatest during the site preparation and grading periods; however, any such increased noise levels would be localized and intermittent. Therefore, the Draft EIR concludes that the project would not introduce any significant noise impacts to the area. The only notable permanent stationary noise source, pointed out in the Draft EIR, would be an on-site emergency generator. However, the generator is proposed to be located within an enclosed area and therefore would not likely increase noise levels from existing conditions.

Transportation and Circulation. The Draft EIR concludes that the proposed project would not significantly increase (traffic) hazards or conflict with any adopted policies for transit, bicycle, or pedestrian facilities. A Preliminary Site Distance evaluation for the project site determined that the minimum site distance, based on a design speed of 35 mph, for the proposed access drives on Obispo Road would be 250 feet. Obispo Road is relatively straight and flat for about 400 feet in either direction. Furthermore, the proposed driveways will provide site entrance and exiting onto Obispo Road, thereby avoiding conflicts with existing residential driveways taking access to/from Avenue Alhambra.

The Draft EIR concludes that there would be no increase in fire vehicular activity in the vicinity of the schools (i.e., Wilkinson School and El Granada Elementary) since the CFPD already serves that area and uses the same streets that it would with the new fire station, including Obispo Road, Coronado Street, Avenue Alhambra, and Santiago Avenue. Additionally, the project would include construction of a new sidewalk in front of the project site to provide safe access for bicycles and pedestrians in an area that currently does not have formal sidewalks.

## C. ALTERNATIVES

### **Alternatives Considered and Rejected as Being Infeasible**

Pursuant to Section 15126.6 of the CEQA Guidelines, the Draft EIR discusses two project alternatives that were considered by the CFPD (Lead Agency) but rejected as being infeasible.

Existing Site Retrofit Alternative. Redeveloping and updating the existing 50-plus year-old fire station at its current location at 531 Obispo Road in El Granada was considered and rejected as being infeasible, as one of the primary objectives for the project is to increase the size of the fire station to accommodate modern equipment for both current and future services. Given the size of the existing

station's parcel (12,455 sq. ft.), it is not feasible to construct a new and updated fire house that would be able to adequately house modern equipment and apparatus necessary for fire protection services. Furthermore, the existing station is surrounded by commercial and residential development, thereby, limiting the opportunity to expand the existing property.

Parcel "A" Site Plan Alternative. Constructing a new fire station on the smaller (western) proposed Parcel "A" (13,575 sq. ft.) at the corner of Obispo Road and Avenue Portola was determined to be infeasible, as this proposed parcel would not be much larger than the existing station's parcel and therefore would be too small to construct a station that could accommodate modern equipment and apparatus. Furthermore, this proposed parcel would be closer to the riparian habitat that runs west of the center of the existing 2.7-acre parcel, and would have further constraint from the required 50-foot riparian buffer zone setback.

### **Alternatives Analysis**

In accordance with the CEQA Guidelines Section 15126, the Draft EIR analyzes three (3) project alternatives that were selected due to their potential to reduce the significant (but mitigatable impacts) of the proposed project. Below is a summary of each alternative and the topics where impacts under the alternative would be greater than the proposed project.

No Project Alternative. Under the No Project Alternative, the proposed project site would remain in its existing undeveloped condition. This alternative would not meet any of the project objectives.

Relocated Site Alternative. The Relocated Site Alternative would consist of the same project components being constructed on an undeveloped parcel located at the northwest corner of Highway 1 and Capistrano Road. The CFPD does not own this alternative site. The Draft EIR concludes that if this site could not be acquired, the CFPD would have to implement condemnation proceedings to obtain title to the property, which conflicts with a project objective to avoid condemnation of private land.

Aesthetics. Under this alternative, the Draft EIR describes that the project would generate more significant visual impacts on views from Highway 1 to the Pacific Ocean as the alternative site is a flat lot located on the west side of Highway 1. Conversely, the proposed project is located on the east side of Highway 1 and would be built into the sloped parcel in order to reduce visual impacts on views from uphill properties to the ocean.

Land Use and Planning. The Draft EIR concludes that this Alternative would result in a more significant impact to Land Use as the alternative site is located at the corner of Highway 1 and Capistrano Road and considered a gateway to the community of Princeton. The Draft EIR cites that the Princeton Plan, while not yet adopted, emphasizes visitor serving uses and recreational opportunities in its Plan Area, which the proposed project could conflict with.

Transportation and Circulation. The Draft EIR concludes that this Alternative would result in more severe impacts to transportation and circulation as this alternative project site is located in a more intensely urbanized area and directly adjacent to Highway 1 and a large intersection. Therefore, the Draft EIR concludes that this site could result in more congestion and greater safety hazards during calls for service given the increased amount of traffic at the alternative site.

Modified Site Plan Alternative. In response to a request by the California Coastal Commission to design the proposed building to be consistent with the design standards for Coastal High Hazard Areas (set forth in the County's Local Coastal Program), a Modified Site Plan Alternative has been analyzed. The Draft EIR notes that the project site is not located within a Coastal High Hazard Area as defined in the County's Zoning Ordinance; however, has identified that under this alternative, the building site would have to be elevated to be at-grade with Avenue Alhambra. Additionally, a 22-foot tall retaining wall would have to be constructed along Obispo Road and backfilled to elevate the site to comply with the Building Code requirement that the bottom of the lowest horizontal structural member of the lowest floor be elevated to or above the base flood level. Access to the site would be relocated from Obispo Road to Avenue Alhambra. This alternative is predicated on the California Coastal Commission's reliance on the California Office of Emergency Services Tsunami Inundation Map for Emergency Planning.

Aesthetics. The Draft EIR explains that this Modified Site Plan Alternative would be more visible than the proposed project and would result in potential view shed impacts from Highway 1 and from Avenue Alhambra due to the 22-foot tall retaining wall that would be needed along Obispo Road to elevate the building to be at-grade with Avenue Alhambra. Additionally, the fire station bays would still need to be constructed to a height of 30 feet in order to accommodate fire apparatus. Therefore, the Draft EIR concludes that this alternative would result in greater impacts to public views and view sheds in the area.

Air Quality. The Draft EIR indicates that the 22-foot tall retaining wall needed to implement this alternative would result in additional construction activities, including more use of heavy equipment which could result in greater impacts to air quality. The Draft EIR identifies that project-generated fugitive dust and other pollutant emissions, including additional truck trips for soil transportation to the site, would be expected to increase above those generated by the proposed project.

Noise. Under this alternative, the Draft EIR describes that ingress/egress to the project site would be relocated to Avenue Alhambra, which would generate a greater level of ambient and operational noise along Avenue Alhambra due to fire trucks entering and exiting along Avenue Alhambra for service calls. Avenue Alhambra is closer to adjacent residential development than Obispo Road, as a number of single-family and multiple-family residential developments in the nearby vicinity are located off of Avenue Alhambra. Therefore, the Draft EIR concludes

that this alternative would result in more significant noise impacts than the proposed project.

Transportation and Circulation. As previously described, this alternative would relocate the project's ingress/egress to Avenue Alhambra. The Draft EIR explains that a greater amount of traffic uses Avenue Alhambra due to existing residential development along this roadway. Additionally, the relocated site access under this alternative would alter the access route from the fire station to Highway 1 by creating slightly longer travel distances along either Avenue Portola or Coronado Avenue, which have greater congestion due to business and school uses along these roadways. Therefore, the Draft EIR concludes that this alternative could result in more congestion and greater safety hazards during service calls than the proposed project.

### **Environmentally Superior Alternative**

Among the range of alternatives discussed in the Draft EIR and summarized above, the No Project Alternative is identified as the environmentally superior alternative.<sup>3</sup> Pursuant to Section 15126.6(e)(2) of the CEQA Guidelines, the Draft EIR shall also identify an environmentally superior alternative among the other alternatives when the No Project Alternative is determined to be the environmentally superior alternative to the proposed project. Therefore, the Draft EIR identifies the Relocated Site Alternative as the environmentally superior alternative.

#### **D. NEXT STEPS**

The CFPD will conduct a public hearing on the Draft EIR on Wednesday, January 18, 2017 at 6:00 p.m. at the Station 41 Board Room, 1191 Main Street, Half Moon Bay, CA 94019.

#### **E. NOTIFICATION OF AVAILABILITY OF THE DRAFT EIR**

The Coastside Fire Protection District, as Lead Agency, has issued notifications of the availability of the Draft EIR to include, but not be limited to, the following:

- State Clearinghouse
- State Responsible Agencies
- State Trustee Agencies
- Other Public Agencies
- Interested Organizations

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<sup>3</sup> The environmentally superior alternative is the alternative that would generate the least environmental impact.

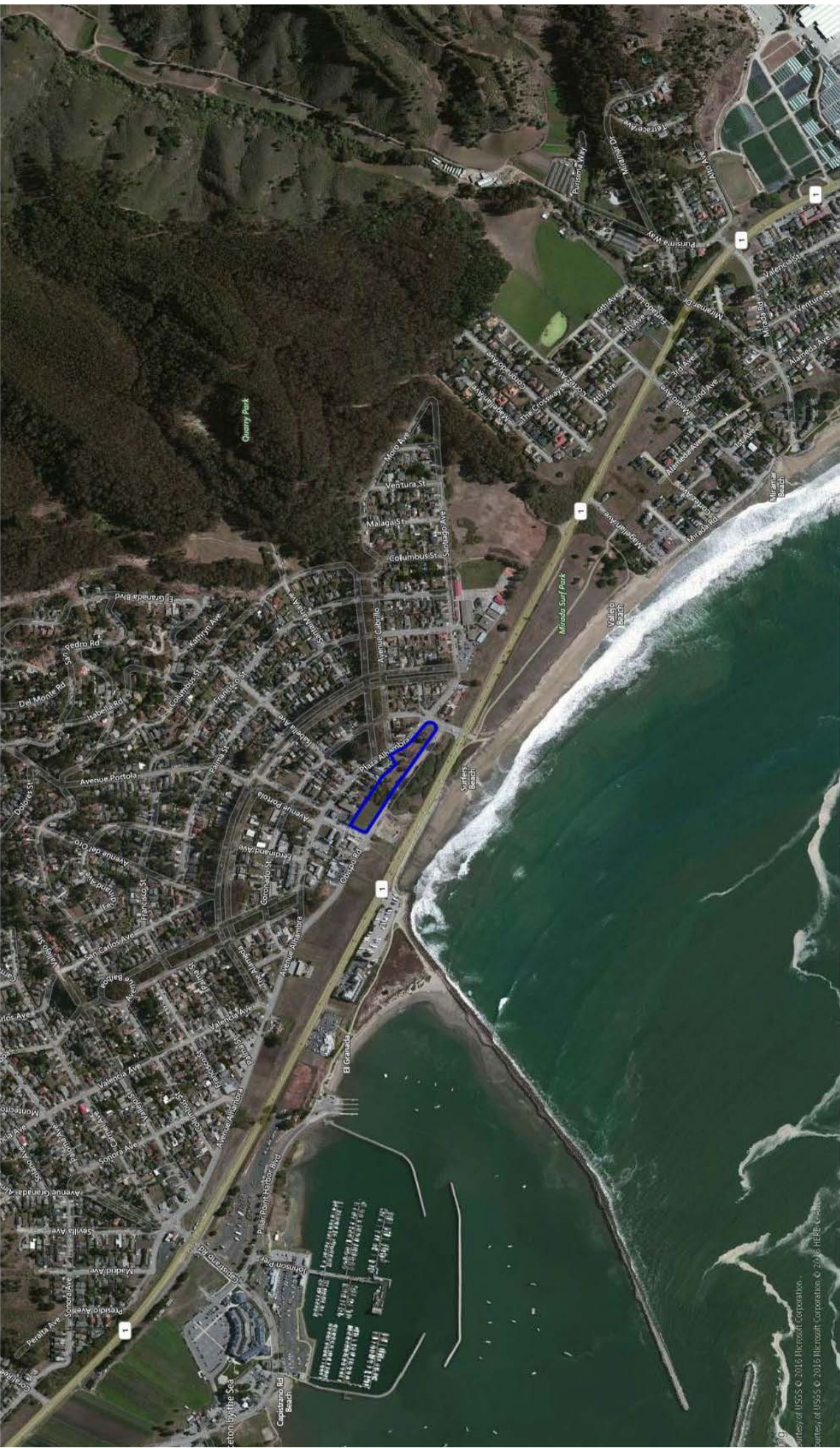
- Property owners within 500 feet of the project site, per latest tax assessment rolls
- Interested parties from the County's Pre-Application Public Workshop

## **ATTACHMENTS**

- A. Project Vicinity Map
- B. Notice of Availability of the Draft EIR
- C. Copies of the Fire Station 41 (El Granada) Replacement Project Draft EIR (with Appendices) are available at the following locations:
  - (1) Electronic version on the Coastsides Fire Protection District's website at:  
<http://www.coastsidefire.org/firestation41>
  - (2) Print copy at 1) Coastsides Fire Protection District Office, 1191 Main Street, Half Moon Bay, CA 94019; 2) United States Post Office, 20 Avenue Portola, El Granada, CA 94018; and 3) San Mateo County Planning and Building Department, 455 County Center, 2nd Floor, Redwood City, CA 94063
- D. Table 2-1 from the Executive Summary of the Draft EIR, Summary of potential impacts and proposed mitigation measures

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**San Mateo County Planning Commission Meeting**

Owner/Applicant: **COASTSIDE FIRE PROTECTION DISTRICT**

File Numbers: **PLN 2016-00346**

Attachment: **A**





NOTICE OF AVAILABILITY (NOA)  
OF A DRAFT ENVIRONMENTAL IMPACT  
REPORT  
FIRE STATION 41 (EL GRANADA)  
REPLACEMENT PROJECT  
COASTSIDE FIRE PROTECTION DISTRICT

DATE: December 2, 2016

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

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

POSTING  
ONLY

BESZ DE LA VEGA

DEC 02 2016

SUBJECT: Notice of Availability (NOA) of the Draft Environmental Impact Report (EIR) for the Fire Station 41 (El Granada) Replacement Project

LOCATION: Undeveloped Parcel (APN) 047-261-030, Unincorporated San Mateo County, Community of El Granada

This NOA is prepared in compliance with Section 15087 of the California Environmental Quality Act (CEQA) Guidelines. The Coastside Fire Protection District (Lead Agency) and its consultants have completed a Draft Environmental Impact Report (Draft EIR) analyzing potential impacts of the Fire Station 41 (El Granada) Replacement Project and are seeking public and agency comments during a public review period starting on Friday, December 2, 2016 and ending on Thursday, January 19, 2017.

The Draft EIR is available on the Coastside Fire Protection District (CFPD) website at <http://www.coastsidefire.org/home>. Hard copies are available for review at the following locations:

Coastside Fire Protection District  
1191 Main Street  
Half Moon Bay, CA 94019

United States Post Office  
20 Avenue Portola  
El Granada, CA 94018

Your comments are welcome on the CFPD's Draft EIR and may be provided orally at the public hearing, in writing or by email. The public hearing will be conducted by the CFPD as follows:

Wednesday, January 18, 2017  
6:00pm  
Station 41 Board Room  
1191 Main Street  
Half Moon Bay, CA 94019

NOA – Fire Station 41 (El Granada) Replacement Project  
December 2, 2016

1

## San Mateo County Planning Commission Meeting

Owner/Applicant: **COASTSIDE FIRE PROTECTION DISTRICT** Attachment: **B**

File Numbers: **PLN 2016-00346**

Written and e-mail comments may be submitted 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.

All comments are due to the CFPD by the close of business on Thursday, January 19, 2017. Substantive comments received by the close of the comment period will be responded to in writing in a Final EIR. The Final EIR must be completed and certified before any decision can be made about the proposed project.

### **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 2.7-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 project site contains no existing driveways; however, the site is accessible via Obispo Road, Avenue Alhambra, and Avenue Portola.

### **2. Project Description**

The CFPD proposes construction of a new Fire Station 41 (El Granada) at the location described above to replace the existing 4,000-square-foot aging approximately 50 year old Fire Station 41 located at 531 Obispo Road, approximately 600 feet to the west of the project site. At build out, the project would result in a 12,425-square-foot, single-story, 3 apparatus bay fire station with access via Obispo Road, an emergency generator, an above ground diesel fuel tank, a flag pole and a communications antenna as well as on-site secured parking for staff and on-site public parking. The proposed Fire Station 41 will provide facilities that are safe, modern, and adequately sized to allow the CFPD to provide for current and future service demands for the next 50 years which the existing Fire Station 41 is not capable of providing. The project would include native, drought tolerant landscaping and may include a new curb, gutter and sidewalk along the frontage of the proposed Fire Station 41. Given the sloped topography and existing vegetation, site preparation would include the removal of existing trees and vegetation, as well as require site grading and the construction of retaining walls. In addition to the construction of the proposed fire station, CFPD is requesting a minor subdivision to divide the split-zoned project site into two parcels—one for each zoning district on the property. One parcel (Parcel A), consisting of the westernmost 0.31-acre (13,575 square feet) portion of the site zoned Neighborhood Business (C-1 /S-3 /DR) is not proposed for development. The second parcel (Parcel B), consisting of the remaining 2.38-acre portion of the site zoned El Granada Gateway (EG), would contain the proposed new Fire Station 41.



Paul Cole, Assistant Fire Chief

Copies of the Fire Station 41 (El Granada) Replacement Project Draft EIR (with Appendices) are available at the following locations:

- (1) Electronic version on the Coastsides Fire Protection District's website at:

<http://www.coastsidefire.org/firestation41>

- (2) Print copy at:

(a) Coastsides Fire Protection District Office  
1191 Main Street  
Half Moon Bay, CA 94019

(b) United States Post Office  
20 Avenue Portola  
El Granada, CA 94018

(c) San Mateo County Planning and Building Dept.  
455 County Center, 2<sup>nd</sup> Floor  
Redwood City, CA 94063

***San Mateo County Planning Commission Meeting***

Owner/Applicant: **COASTSIDE FIRE PROTECTION DISTRICT** Attachment: **C**

File Numbers: **PLN 2016-00346**

EXECUTIVE SUMMARY

TABLE 2-1 SUMMARY OF IMPACTS AND MITIGATION MEASURES

Significant Impact	Significance Without Mitigation	Mitigation Measures	Significance With Mitigation
<b>AESTHETICS</b>			
AES-1: The proposed project would not have a substantial adverse effect on a scenic vista.	LTS	N/A	N/A
AES-2: The proposed project would not degrade the existing visual character or quality of the site and its surroundings.	LTS	N/A	N/A
AES-3: The proposed project would not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.	LTS	N/A	N/A
AES-4: The proposed project, in combination with past, present, and reasonably foreseeable projects, would not result in less than significant cumulative impacts with respect to aesthetics.	LTS	N/A	N/A
<b>AIR QUALITY</b>			
AIR-1: During construction of the project, construction activities would generate fugitive dust during ground-disturbing activities and would generate substantial construction-related exhaust emissions from on-site construction equipment and on-road vehicle trips that exceeds the BAAQMD significance thresholds identified in Table 4.2-5.	S	<p>AIR-1: The Applicant shall require their construction contractor to comply with the following BAAQMD Best Management Practices for reducing construction emissions of PM<sub>10</sub> and PM<sub>2.5</sub>:</p> <ul style="list-style-type: none"><li>Water all active construction areas at least twice daily or as often as needed to control dust emissions. Watering should be sufficient to prevent airborne dust from leaving the site. Increased watering frequency may be necessary whenever wind speeds exceed 15 miles per hour. Reclaimed water should be used whenever possible.</li><li>Pave, apply water twice daily or as often as necessary to control dust, or apply (non-toxic) soil stabilizers on all unpaved access roads, parking areas, and staging areas at construction sites.</li><li>Cover all trucks hauling soil, sand, and other loose materials or require all trucks to maintain at least 2 feet of freeboard (i.e., the minimum required space between the top of the load and the top of the trailer).</li><li>Sweep daily (with water sweepers using reclaimed water if possible) or as often as needed all paved access roads (e.g., Obispo Road, Avenue Alhambra, and Coronado Road), parking areas, and staging areas at the construction site to control dust.</li><li>Sweep public streets daily (with water sweepers using reclaimed water if</li></ul>	LTS

LTS = Less than Significant LTS/M = Less than Significant with Mitigation SU = Significant and Unavoidable

2-10

DECEMBER 2016

San Mateo County Planning Commission Meeting

Owner/Applicant: COASTSIDE FIRE PROTECTION DISTRICT

File Numbers: PLN 2016-00346

Attachment: D

## EXECUTIVE SUMMARY

TABLE 2-1 SUMMARY OF IMPACTS AND MITIGATION MEASURES

Significant Impact	Significance Without Mitigation	Mitigation Measures	Significance With Mitigation
AIR-2: Construction of the proposed project would cumulatively contribute to the non-attainment designations of the SFBAB.	S	<p>possible) in the vicinity of the project site, or as often as needed, to keep streets free of visible soil material.</p> <ul style="list-style-type: none"> <li>Hydro-seed or apply non-toxic soil stabilizers to inactive construction areas.</li> <li>Enclose, cover, water twice daily, or apply non-toxic soil binders to exposed stockpiles (e.g., dirt, sand).</li> <li>Limit vehicle traffic speeds on unpaved roads to 15 mph.</li> <li>Replant vegetation in disturbed areas as quickly as possible.</li> <li>Install sandbags or other erosion control measures to prevent silt runoff from public roadways.</li> </ul> <p>The County of San Mateo Planning and Building Official or their designee shall verify compliance that these measures have been implemented during normal construction site inspections.</p>	LTS
AIR-3: Construction activities of the project could expose sensitive receptors to substantial concentrations of TAC and PM <sub>2.5</sub> .	S	<p>AIR-3: During construction, the construction contractor(s) shall use construction equipment fitted with Level 3 Diesel Particulate Filters (DPF) and engines that meet the USEPA Certified Tier 3 emissions standards for all equipment of 25 horsepower or more.</p> <p>The construction contractor shall maintain a list of all operating equipment in use on the project site for verification by the County of San Mateo Building Division official or his/her designee. The construction equipment list shall state the makes, models, and number of construction equipment on-site. Equipment shall be properly serviced and maintained in accordance with manufacturer recommendations. The construction contractor shall ensure that all non-essential idling of construction equipment is restricted to five minutes or less in compliance with California Air Resources Board Rule 2449. Prior to issuance of any construction permit, the construction contractor shall ensure that all construction plans submitted to the County of San Mateo Planning Division and/or Building Division clearly show the requirement for Level 3 DPF and USEPA Tier 3 or higher emissions standards for construction equipment over 25 horsepower.</p>	LTS
AIR-4: Implementation of the project would cumulatively contribute to air quality impacts in the San Francisco Bay Area Air Basin.	S	<p>AIR-4: Implementation of Mitigation Measures AIR-1 and AIR-3 would reduce cumulative air quality impacts.</p>	LTS

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## EXECUTIVE SUMMARY

TABLE 2-1 SUMMARY OF IMPACTS AND MITIGATION MEASURES

Significant Impact	Significance Without Mitigation	Mitigation Measures	Significance With Mitigation
BIOLOGICAL RESOURCES			
BIO-1a: Proposed development could potentially result in an inadvertent take of individual CRLF or SFGS in the remote instance that individuals were to disperse onto the site in the future, in which case this could result in a potential violation of the Endangered Species Acts if adequate controls and preconstruction surveys are not implemented.	S	<p>BIO-1a: Ensure Avoidance of California Red-legged Frog and San Francisco Garter Snake. The following measures shall be implemented as recommended in the 2015 Preliminary Environmentally Sensitive Habitat Area Assessment of the site to ensure avoidance of individual California red-legged frog (CRLF) or San Francisco garter snake (SFGS) in the remote instance individuals were to disperse onto the site in the future in advance of or during construction:</p> <ul style="list-style-type: none"><li>▪ <i>Wildlife exclusion fence:</i> Wildlife exclusion fencing shall be installed prior to the start of construction and maintained until construction of the proposed project is complete. Such fencing shall, at a minimum, run along the proposed project boundaries with riparian habitat and for a distance of at least 100 feet perpendicular to riparian habitat. Silt fence material may be used to also provide erosion control, however, per CRLF and SFGS fence standards, it must be at least 42 inches in height (at least 36 inches above ground and buried at least 6 inches below the ground) and stakes must be placed on the inside of the project (side on which work will take place).</li><li>▪ <i>Pre-construction survey:</i> Pre-construction surveys for CRLF and SFGS shall be conducted prior to initiation of project activities including fence installation) and within 48 hours of the start of ground disturbance activities following completion of exclusion fence installation. Surveys are to be conducted by approved qualified biologists with experience surveying for each species.</li></ul> <p>If project activities are stopped for greater than 7 days, a follow-up pre-construction survey may be required within 48 hours prior to reinitiating project activities.</p> <ul style="list-style-type: none"><li>▪ <i>Earth Disturbing Activities only during dry weather:</i> No earth disturbing activities shall take place during rain events when there is potential for accumulation greater than 0.25-inch in a 24-hour period. In addition, no earth disturbing activities shall occur for 48 hours following rain events in which 0.25 inch of rain accumulation within 24 hours.</li><li>▪ <i>Biological monitoring:</i> An approved biologist shall be required to inspect and approve installation of the exclusion fence.</li><li>▪ <i>Erosion Control Materials:</i> Tightly woven fiber netting or similar material shall be used for erosion control or other purposes to ensure amphibians and reptile species do not get trapped. Plastic mono-filament netting (erosion control matting), rolled erosion control products, or similar material shall not be used.</li></ul>	LTS

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## EXECUTIVE SUMMARY

TABLE 2-1 SUMMARY OF IMPACTS AND MITIGATION MEASURES

Significant Impact	Significance Without Mitigation	Mitigation Measures	Significance With Mitigation
BIO-1b: Proposed development could potentially result in inadvertent loss of bird nests in active use, which would conflict with the federal Migratory Bird Treaty Act and California Fish and Game Code if adequate controls and preconstruction surveys are not implemented.	S	<p>BIO-1b: Ensure Avoidance of Bird Nests in Active Use. Tree removal, landscape grubbing, and building demolition shall be performed in compliance with the Migratory Bird Treaty Act and relevant sections of the California Fish and Game Code to avoid loss of nests in active use. This shall be accomplished by scheduling building demolition, tree removal and landscape grubbing outside of the bird nesting season (which occurs from February 1 to August 31) to avoid possible impacts on nesting birds if new nests are established in the future. Alternatively, if building demolition, tree removal and landscape grubbing cannot be scheduled during the non-nesting season (September 1 to January 31), a pre-construction nesting survey shall be conducted. The pre-construction nesting survey shall include the following:</p> <ul style="list-style-type: none"> <li>▪ A qualified biologist (Biologist) shall conduct a pre-construction nesting bird (both passerine and raptor) survey within seven calendar days prior to tree removal, landscape grubbing, and/or building demolition.</li> <li>▪ If no nesting birds or active nests are observed, no further action is required and tree removal, landscape grubbing, and building demolition shall occur within seven calendar days of the survey.</li> <li>▪ Another nest survey shall be conducted if more than seven calendar days elapse between the initial nest search and the beginning of tree removal, landscape grubbing, and building demolition.</li> <li>▪ If any active nests are encountered, the Biologist shall determine an appropriate disturbance-free buffer zone to be established around the nest location(s) until the young have fledged. Buffer zones vary depending on the species (i.e., typically 75 to 100 feet for passerines and 300 feet for raptors) and other factors such as ongoing disturbance in the vicinity of the nest location. If necessary, the dimensions of the buffer zone shall be determined in consultation with the California Department of Fish and Wildlife.</li> <li>▪ Orange construction fencing, flagging, or other marking system shall be installed to delineate the buffer zone around the nest location(s) within which no construction-related equipment or operations shall be permitted. Continued use of existing facilities such as surface parking and site maintenance may continue within this buffer zone.</li> <li>▪ No restrictions on grading or construction activities outside the prescribed buffer zone are required once the zone has been identified and delineated in the field and workers have been properly trained to avoid the buffer zone area.</li> </ul>	LTS

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## EXECUTIVE SUMMARY

TABLE 2-1 SUMMARY OF IMPACTS AND MITIGATION MEASURES

Significant Impact	Significance Without Mitigation	Mitigation Measures	Significance With Mitigation
BIO-2: The proposed project would not 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.	LTS	<ul style="list-style-type: none"> <li>Construction activities shall be restricted from the buffer zone until the Biologist has determined that young birds have fledged and the buffer zone is no longer needed.</li> <li>A survey report of findings verifying that any young have fledged shall be submitted by the Biologist for review and approval by the County of San Mateo prior to initiation of any tree removal, landscape grubbing, building demolition, and other construction activities within the buffer zone. Following written approval by the County, tree removal, and construction within the nest-buffer zone may proceed.</li> </ul>	N/A
BIO-3: The proposed project would not have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.	LTS	N/A	N/A
BIO-4: The proposed project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.	LTS	N/A	N/A
BIO-5: The proposed project, in combination with past, present and reasonably foreseeable projects, would not result in less than significant cumulative impacts with respect to biological resources.	LTS	N/A	N/A
<b>HYDROLOGY AND WATER QUALITY</b>			
HYDRO-1: The proposed project would not place within a 100-year flood hazard area structures which would impede or redirect flood flows or be impacted by future sea level rise.	No Impact	N/A	N/A

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## EXECUTIVE SUMMARY

**TABLE 2-1 SUMMARY OF IMPACTS AND MITIGATION MEASURES**

Significant Impact	Significance Without Mitigation	Mitigation Measures	Significance With Mitigation
HYDRO-2: The proposed project would not be subject to inundation by a seiche or mudflow, and is unlikely to be inundated by a tsunami.	LTS	N/A	N/A
HYDRO-3: The proposed project, in combination with past, present, and reasonably foreseeable projects, would not result in a significant cumulative impact with respect to hydrology and water quality.	LTS	N/A	N/A
<b>NOISE</b>			
NOISE-1: The proposed project would not have the potential to expose people to or generate excessive groundborne vibration or groundborne noise levels.	LTS	N/A	N/A
NOISE-2: Construction activities associated with buildout of the proposed project would not result in substantial temporary or periodic increases in ambient noise levels in the vicinity of the project site above existing levels.	LTS	N/A	N/A
NOISE-3: This proposed project, in combination with past, present, and reasonably foreseeable projects, would not result in less than significant impacts with respect to noise.	LTS	N/A	N/A
<b>TRANSPORTATION AND CIRCULATION</b>			
TRANS-1: The proposed project would not substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).	LTS	N/A	N/A
TRANS-2: The proposed project would not conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities.	LTS	N/A	N/A
TRANS-3: The proposed project, in combination with past, present and reasonably foreseeable projects, would not result in a significant cumulative impact with respect to transportation and traffic.	LTS	N/A	N/A

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