

STATE OF CALIFORNIA—NATURAL RESOURCES AGENCY

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CALIFORNIA COASTAL COMMISSION

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January 18, 2017

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

RE: Notice of Availability (NOA) of a Draft Environmental Impact Report (DEIR) -
Relocation El Granada Fire Station 41

Dear Assistant Fire Chief Cole:

Thank you for forwarding the Notice of Availability (NOA) and Draft Environmental Impact Report (DEIR), dated December 2016, and received in our San Francisco office on January 4, 2017 for review and comment. The Coastside Fire Protection District (CFPD) has submitted applications to San Mateo County for a Coastal Development Permit (CDP), Design Review, Use Permit, and Variance & Grading Permit to construct a new fire station on a 2.7-acre vacant parcel in El Granada, San Mateo County. The project referral described the building as being 12,340 square-feet while the DEIR description is for 12,425-square-foot. Please account for the increase in square-footage. Approximately one acre of the 2.7-acre parcel would be developed with the proposed project. CFPD is also requesting a minor subdivision of the existing parcel along the C-1/S-3/DR and EG/DR/CD zoning boundary line to create a separate parcel for the C-1/S-3/DR portion of the existing parcel. This proposed new fire station would replace the existing Station 41 located at 531 Obispo Road.

A01-01

Biological Resources: The proposed project, as described above, includes minor subdivision of the parcel into two parcels. The two resultant parcels, should the proposed subdivision be approved, will be 2.38 acres and 0.31 acre. The larger of the two, newly-created parcels would be zoned as EG (El Granada Gateway District) and contains the site for the proposed new station as well as riparian habitat, while the remaining westernmost parcel will be zoned as C-1/S-3/DR (Neighborhood Business). We suggest that the applicant be required to maintain and protect the existing habitat (including the required buffer) and open space character of this portion of the parcel in perpetuity. The approval of this proposed project should include this as a requirement.

A01-02

The Assessment for sensitive habitat is preliminary. The project proponent should provide a description or breakdown of what will be done to "finalize" the assessment. Mitigation BIO-1b is to address buffers for biological resources at the site; specifically nesting birds. Determination of the buffers shall be made upon consultation with the California Department of Fish and Wildlife in order to confirm the appropriate distances for the proposed project at this site. We recommend that buffers for nesting raptors be 500 feet; and 300 feet for passerines (dependent upon the identified species).

A01-03

The DEIR states that Figure 4.3-1 shows the location of the riparian corridor on the site relative to the "footprint" of the proposed project. The applicant should revise this figure so that one can see exactly where the structures and other development will be sited on the parcel in relation to the riparian habitat

A01-04

Paul Cole
Fire Station 41 Replacement
Draft EIR - State Clearing House #2015062089
January 18, 2017

and buffer. They should add an overlay of the proposed site plan onto Figure 4.3-1, for clarity and to show whether or not the buffers meet LCP Policy 7.11 requirements.

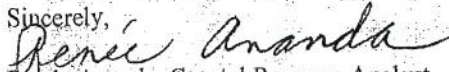
Appendix A, the Initial Study (WRA Environmental Consultants' assessment) suggests that the stream is intermittent; therefore, a 30-foot buffer is applicable. The TRA Environmental Sciences letter, however, indicates there was hydrology in August 2014 suggesting that the drainage is perennial. We recommend that the 50-foot, rather than a 30-foot, buffer be applied. It appears that the 50-foot buffer will not preclude the development as proposed; and will ensure protection of the resource as required by the LCP.

The preliminary Environmentally Sensitive Habitat Area (ESHA) analysis in Appendix A addresses California red-legged frog (CRLF) and San Francisco garter snake (SFGS). The assessment indicates that the habitat may not have value for the breeding purposes. It is possible that the culverts in the area may be used by the species and the riparian habitat may also serve as habitat that provides relief for animals in the area, although continuous habitat is preferable. The riparian habitat could be designated ESHA if CRLF and SFGS are encountered during pre-construction surveys. Saltmarsh yellowthroat is a bird species that likes to use willows as habitat. We recommend that although protocol-level surveys may not be warranted, measures (including pre-construction surveys) to avoid and or minimize potential impacts on the species mentioned above be in place prior to construction activities. The breeding/nesting season, i.e., when saltmarsh yellowthroat would be most sensitive is mid-March through the end of July. CRLF animal movement will increase following the first winter rains but they may otherwise occur within the corridor and/or small animal burrows in the upland areas. SFGS is the same as above-described for CRLF. SFGS preys on CRLF so if frog is present, the chances of the snake also occurring increase (and vice versa).

Aesthetics: The discussion regarding form, mass, and scale indicates that antennae would be mounted on the proposed station; although the exact height of the antennae has yet to be determined. The DEIR explains that the proposed antennae will likely be similar in height to what is mounted on the current station. The simulations for the proposed project do not show roof-mounted antennae. A simulation of the building should be provided in order to see the potential visual impacts, particularly on the west view from Avenue Alhambra.

Air Quality: Mitigation Measure AIR-1 should require that hydroseed used for erosion control and re-vegetated areas use native species. We recommend that all plantings be native species appropriately acclimated for site conditions in order to ensure success.

Please feel free to contact me via e-mail at renee.ananda@coastal.ca.gov or call me at 415-904-5292 if you have questions regarding our comments.

Sincerely,

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

Cc: Summer Burlison, San Mateo County
Kerry Burke

A01-04
cont.

A01-05

A01-06

A01-07

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A01-11

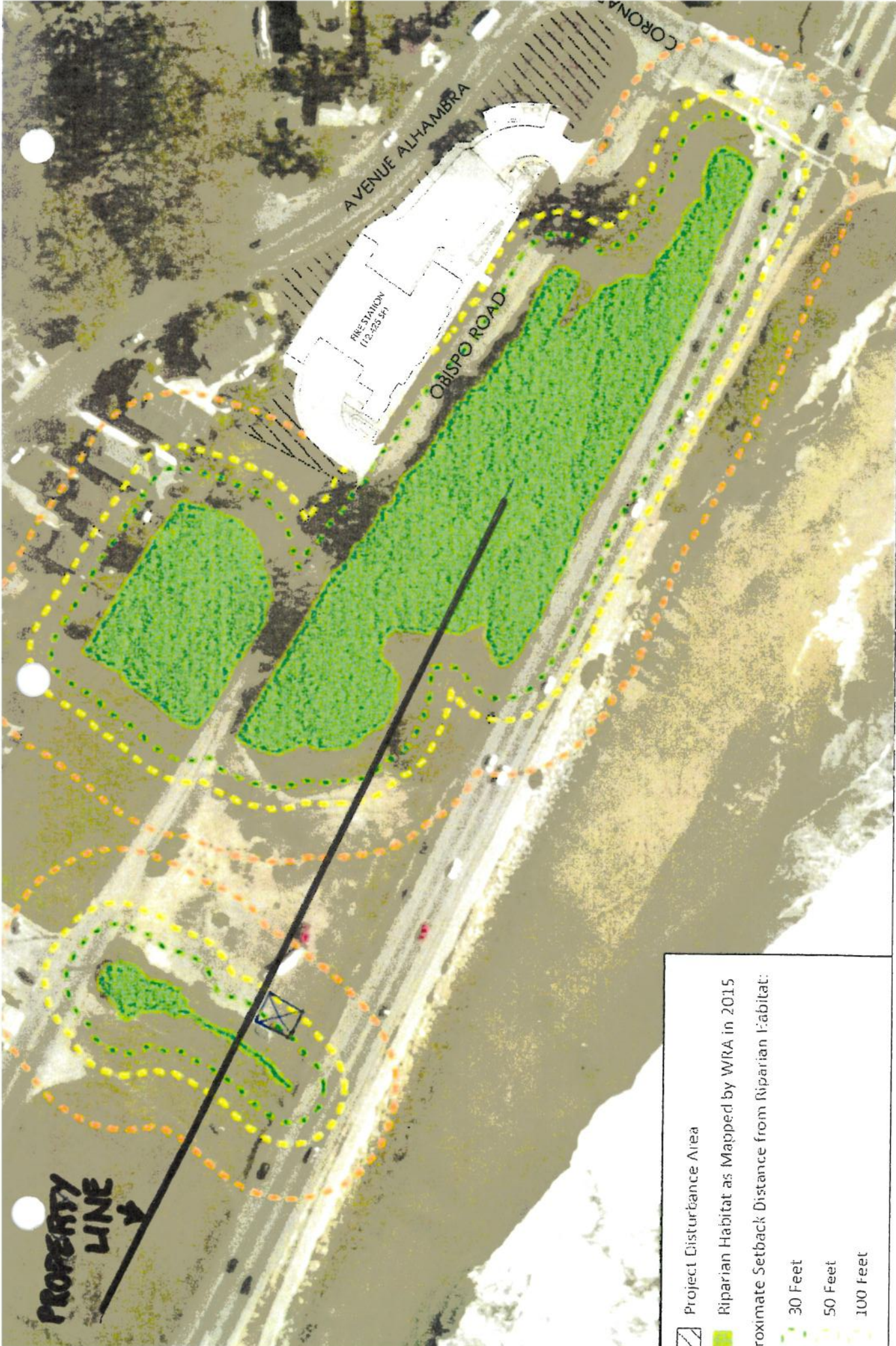
COMMENTS AND RESPONSES






TABLE 5-1 COMMENTS AND RESPONSE MATRIX

Comment #	Date	Comment	Response
A. State Agencies			
A01	1/18/2017	Renee Ananda, Coastal Program Analyst, California Coastal Commission, North Central Coast District	
A01-01		<p>Dear Assistant Fire Chief Cole:</p> <p>Thank you for forwarding the Notice of Availability (NOA) and Draft Environmental Impact Report (DEIR), dated December 2016, and received in our San Francisco office on January 4, 2017 for review and comment. The Coastside Fire Protection District (CFPD) has submitted applications to San Mateo County for a Coastal Development Permit (CDP), Design Review, Use Permit, and Variance & Grading Permit to construct a new fire station on a 2.7-acre vacant parcel in El Granada, San Mateo County. The project referral described the building as being 12,340 square-feet while the DEIR description is for 12,425-square-feet. Please account for the increase in square-footage. Approximately one acre of the 2.7-acre parcel would be developed with the proposed project. CFPD is also requesting a minor subdivision of the existing parcel along the C-1/S-3/DR and EG/DR/CD zoning boundary line to create a separate parcel for the C-1/S-3/DR portion of the existing parcel. This proposed new fire station would replace the existing Station 41 located at 531 Obispo Road.</p>	<p>The 85 square-foot increase from the square footage stated in the County's project referral was due to Fire Department program adjustments to fit the required turnout equipment and associated functional needs that changed from when the original plan was prepared. The remainder of this comment is an introductory remark and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. Therefore, no further response is required.</p>
A01-02		<p>Biological Resources: The proposed project, as described above, includes minor subdivision of the parcel into two parcels. The two resultant parcels, should the proposed subdivision be approved, will be 2.38 acres and 0.31 acre. The larger of the two, newly-created parcels would be zoned as EG (El Granada Gateway District) and contains the site for the proposed new station as well as riparian habitat, while the remaining westernmost parcel will be zoned as C-1/S-3/DR (Neighborhood Business). We suggest that the applicant be required to maintain and protect the existing habitat (including the required buffer) and open space character of this portion of the parcel in perpetuity. The approval of this proposed project should include this as a requirement.</p>	<p>CFPD will take this recommendation into consideration, however, it should be noted that with the proposed footprint of the new structures and other improvements would be located over 50 feet from the edge of the riparian habitat per the LCP requirements, and the existing habitat would not be altered by the proposed project. In addition, the proposed relocated Fire Station 41 will be 1% over the maximum allowed lot coverage for the EG District if the required exception to maximum lot coverage is obtained). Therefore, it is extremely unlikely that any additional development would be allowed on this parcel. As such, the remainder of the site, including the riparian habitat on the site, would be protected from future development by the EG District zoning. Any change to the EG District maximum lot coverage or change to the parcel's EG District zoning, would require review and approval by San Mateo County and the California Coastal Commission.</p>
A01-03		<p>The Assessment for sensitive habitat is preliminary. The project proponent should provide a description or breakdown of what will be done to "finalize" the assessment. Mitigation BIO-1b is to address buffers for biological resources at the site; specifically nesting birds. Determination of the buffers shall be made upon consultation with the California Department of Fish and Wildlife in order to confirm the appropriate distances for the proposed project at this site. We recommend that buffers for nesting raptors be 500 feet, and 300 feet for passerines (dependent upon the identified species).</p>	<p>Mitigation Measure BIO-1b states the Biologist shall determine an appropriate disturbance-free buffer zone to be established around the nest location(s) until the young have fledged, and that the buffer zones vary depending on the species. A buffer zone of 75 to 100 feet is typically used for passerines and a buffer zone of 300 feet is typically used for raptors. Several factors are considered when establishing the buffer zones such as potential disturbances near nest locations. The recommendation of establishing 300- and 500-foot buffers will be taken into consideration, but, the dimensions of the buffer zone shall be determined in consultation with the California Department of Fish and Wildlife if Mitigation Bio-1b is triggered (by scheduling any demolition, tree removal or landscape grubbing</p>

TABLE 5-1 COMMENTS AND RESPONSE MATRIX

Comment #	Date	Comment	Response
A01-04		The DEIR states that Figure 4.3-1 shows the location of the riparian corridor on the site relative to the "footprint" of the proposed project. The applicant should revise this figure so that one can see exactly where the structures and other development will be sited on the parcel in relation to the riparian habitat and buffer. They should add an overlay of the proposed site plan onto Figure 4.3-1, for clarity and to show whether or not the buffers meet LCP Policy 7.11 requirements.	Figure 4.3-1, as shown in Chapter 3 of this Final EIR, has been updated to show the approximate location of the development footprint of the project in relation to the riparian habitat and buffer zones.
A01-05		Appendix A, the Initial Study (WRA Environmental Consultants' assessment) suggests that the stream is intermittent; therefore, a 30-foot buffer is applicable. The TRA Environmental Sciences letter, however, indicates there was hydrology in August 2014 suggesting that the drainage is perennial. We recommend that the 50-foot, rather than a 30-foot, buffer be applied. It appears that the 50-foot buffer will not preclude the development as proposed, and will ensure protection of the resource as required by the LCP.	As stated on page 4.3-23 of the Draft EIR, and as shown in the updated Figure 4.3-1 included in Chapter 3 of this Final EIR, the footprint of the new structures and other improvements would be located more than 50 feet from the edge of the riparian habitat on the site. The proposed driveways would be located within the 50-foot buffer, and would connect to the existing Obispo Road within a previously disturbed and developed roadbed. As such, the project complies with the buffer zone requirements set forth in LCP Policy 7.11, regardless of whether the unnamed drainage is considered an intermittent or perennial stream.
A01-06		The preliminary Environmentally Sensitive Habitat Area (ESHA) analysis in Appendix A addresses California red-legged frog (CRLF) and San Francisco garter snake (SFGS). The assessment indicates that the habitat may not have value for the breeding purposes. It is possible that, the culverts in the area may be used by the species and the riparian habitat may also serve as habitat that provides relief for animals in the area, although continuous habitat is preferable.	The Draft EIR concludes that although suitable habitat for special status species, including CRLF and SFGS, is absent from the site, there is a remote potential for an individual CRLF or SFGS to disperse onto the site in the future. Mitigation Measure BIO-1a is identified to reduce this remote impact to a less than significant level and includes several components including wildlife exclusion fencing approved and inspected by an approved biologist, a pre-construction survey, prohibition against earth disturbing activities during wet weather, and use of erosion control materials that ensure amphibians and reptiles will not get trapped. See pages 4.3-19 - 4.3-20 of the Draft EIR. While there are no known culverts on the project site, these measures ensure that any CRLF and SFGS, using any culverts that may exist in the area as habitat, would be protected.
A01-07		The riparian habitat could be designated ESHA if CRLF and SFGS are encountered during pre-construction surveys. Saltmarsh yellowthroat is a bird species that likes to use willows as habitat. We recommend that although protocol-level surveys may not be warranted, measures (including pre-construction surveys) to avoid and/or minimize potential impacts to the species mentioned above be in place prior to construction activities. The breeding/nesting season, i.e., when saltmarsh yellow throat would be most sensitive is mid-March through the end of July.	With respect to CRLF and SFGS, Mitigation Measure BIO-1a requires that pre-construction surveys for CRLF and SFGS be conducted prior to initiation of project activities including fence installation as well as within 48 hours of the start of ground disturbance activities following completion of exclusion fence installation. Further, 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.
			Mitigation Measure BIO-1b addresses bird species and states that building demolition, tree removal and landscape grubbing shall be scheduled outside of the bird nesting season, which occurs from February 1 to August 31. Additionally, a pre-construction nesting bird (both passerine and raptor) survey would be conducted within seven calendar days prior to tree



-  Project Disturbance Area
-  Riparian Habitat as Mapped by WRA in 2015
- Approximate Setback Distance from Riparian Habitat:**
 -  30 Feet
 -  50 Feet
 -  100 Feet

Source: WRA Environmental Consultants, 2015; Jeff Katz Architecture, 2017; PlaceWorks, 2017.

