CYPRESS POINT PROJECT
CUMULATIVE IMPACTS ANALYSIS

1. LEGAL REQUIREMENTS

In addition to requiring that an Environmental Impact Report (EIR) or Negative Declaration evaluate the impacts of a proposed project on environmental resources, CEQA also requires that these environmental documents include an assessment of the contribution of the proposed project to the cumulative impacts on the same environmental resources (CEQA Guidelines, Section 15130(a)). State CEQA Guidelines Section 15355 defines a cumulative impact as two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts.

The cumulative analysis is intended to identify impacts of the proposed project that may be minor when viewed in isolation, but which contribute to a larger impact when combined with similar impacts from past, present, and anticipated future projects. State Guidelines Section 15130(b) indicates that the level of detail of the cumulative analysis need not be as great as for the project impact analyses, that it should reflect the severity of the impacts and their likelihood of occurrence, and that it should be focused, practical, and reasonable.

The standard used in assessing the contribution of a proposed project to a cumulative impact is whether its incremental effect will be "cumulatively considerable". Cumulatively considerable, as defined in State CEQA Guidelines Section 15065(a)(3), means that the "incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects."

An individual project may not be responsible for entirely funding or implementing mitigation to address a cumulative impact that it is only partially responsible for causing. However, Section 15130(a)(3) of the State CEQA Guidelines states that an environmental document may determine that a project's contribution to a significant cumulative impact will be rendered less than cumulatively considerable, and thus not significant, if a project is required to implement or fund its fair share of a mitigation measure or measures designed to alleviate the cumulative impact.

Thus, a cumulative analysis is a two-step process that first determines whether multiple projects acting together cause an adverse cumulative impact. If a significant cumulative effect is identified, the analysis then characterizes the contribution of the individual project to the cumulative impact. Project contributions to a cumulative impact may be classified as cumulatively considerable (i.e., making a meaningful contribution to a cumulative effect as defined above) or as not cumulatively considerable. In general, where a project makes no contribution to a cumulative impact, its contribution would not be classified as cumulatively considerable. Similarly, where mitigation is identified for an individual project to fully avoid or remediate a project specific impact, the project's contribution would not be considered to be

cumulatively considerable. A third way in which a project's contribution could be considered less than cumulatively considerable would be if the project were subject to requirements or programs that were designed to reduce the cumulative effect below a level of significance.

2. METHODOLOGY

This section describes the methodology used in conducting the cumulative impacts analysis, including: topics evaluated, approach to the analysis, geographic scope of analysis, and analytical methods used to conduct the analysis.

2.1 APPROACH TO CUMULATIVE ANALYSIS

The State CEQA Guidelines (Section 15130) identifies two basic methods for establishing the cumulative environment in which the project is to be considered: using a list of past, present, and probable future projects (List Method); or the use of adopted projections from a general plan, other regional planning document, or a certified EIR for such a planning document (Projections Method).

This analysis uses a combination of the list and planning document approach. For each impact area, the approach to cumulative impacts is based on the list approach, the projection approach, or a combination thereof, based on the best information available and the most effective method for identifying cumulative impacts for a particular category of impacts. Table 1 describes which method is used for each resource topic.

2.2 GEOGRAPHIC SCOPE

Different environmental topics have different geographic potential for contributing to cumulative impacts. For instance, construction noise impacts are generally localized, so only other noise-generating projects in the near vicinity would have the potential to impact the same sensitive receptors. On the other hand, pollutant emissions can travel far and combine with emissions from distant projects. Therefore, each resource topic may have a different geographic scale in which the contribution of other projects should be considered.

For each cumulative environmental issue area discussed, the issue-specific cumulative geographic scope is identified in Table 2.

Table 1 Approach to Cumulative Impacts	
Resource Issue	**Approach to Analysis**
Aesthetics	List
Agricultural and Forestry Resources	List
Air Quality	Projection, List
Biological Resources	Projection
Cultural Resources	List
Energy	Projection
Geology and Soils	List
Greenhouse Gas Emissions	Projection
Hazards and Hazardous Materials	List
Hydrology and Water Quality	List
Land Use and Planning	List
Mineral Resources	List
Noise	List and Projection
Population and Housing	List
Public Services and Utilities	List
Recreation	List
Transportation	List and Projection
Tribal Cultural Resources	List
Wildfire	List

Table 2 Geographic Scope of Cumulative Impacts	
Resource Issue	**Geographic Area**
Aesthetics	Viewshed of project
Agriculture and Forestry Resources	Project site and vicinity
Air Quality	Bay Area Air Basin
Biological Resources	San Mateo County
Cultural Resources	San Mateo County
Energy	Bay Area, northern California
Geology and Soils	Project site and vicinity
Global Climate Change	Global, Bay Area
Hazards and Hazardous Materials	Project site and vicinity
Hydrology and Water Quality	Montara Creek watershed
Land Use and Planning	San Mateo County LCP area
Mineral Resources	San Mateo County LCP area
Noise	For construction impacts: 500-foot radius around project site For traffic noise impacts: San Mateo County
Population and Housing	San Mateo County LCP area
Public Services and Utilities	Service areas of public service and utility providers
Recreation	San Mateo County LCP area
Transportation and Circulation	San Mateo County
Tribal Cultural Resources	Project site and vicinity
Wildfire	San Mateo County LCP area

2.3 PROBABLE FUTURE PROJECTS (LIST METHOD)

CEQA requires the evaluation of past, present, and reasonably foreseeable future projects in a cumulative analysis. The effects of past and present projects on the environment are reflected by the existing conditions in the project area. For those resource topics being evaluated by the list method (see Table 1), a list of probable future projects is provided below. Probable future projects are those within the cumulative geography that have the possibility of creating environmental impacts on the same resources as the proposed project and which could combine to create a cumulative impact. Probable future projects were selected for inclusion in the cumulative project list if they:

- Are currently partially occupied or under construction,
- Have received final discretionary approvals,
- Have applications accepted as complete by local agencies and are currently undergoing environmental review, or
- Are proposed projects that have been discussed publicly by an applicant or that otherwise become known to a local agency, and for which sufficient information about the project is available to allow at least a general analysis of its environmental impacts.

A list of foreseeable projects was obtained in 2018 and updated in March 2019 from the City of Pacifica (O'Connor pers. comm. 2018; City of Pacifica website 2019), the City of Half Moon Bay (Garrison pers. comm. 2018; City of Half Moon Bay website), and the County of San Mateo (for the unincorporated portions of the Midcoast). This information is summarized in Table 3, which provides information about housing units by type and by geographic area. In addition, Table 4 summarizes no residential projects by type and geographic area.

Relevant information from the list of projects in Table has been incorporated into the analysis of cumulative impacts, as described below in Section 3.0.

Table 3	Reasonably Foreseeable Projects: Residential Projects (number of units)							
	El Granada	Half Moon Bay	Montara	Miramar	Moss Beach	Pacifica	Princeton	Grand Total
Single-Family DU	23	18	11	4	14	18		88
Accessory DU	10	1	5		3			19
Multi-housing		13[1]				54[2]		
Grand Total	**33**	**19**	**16**	**4**	**17**	**18**	**0**	**107**

Notes: [1] *Plus a project of conversion of a commercial building to residential and a residential project without unit count at the moment.*
[2] *Plus a senior housing project, a project of condominiums and a project of townhomes without unit count at the moment.*

Sources: O'Connor 2018, Garrison 2018, County of San Mateo 2018, City of Half Moon Bay 2019, City of Pacifica 2019.

Table 4	Non-Residential Reasonably Foreseeable Projects (number of projects)							
	El Granada	Half Moon Bay	Montara	Miramar	Moss Beach	Pacifica	Princeton	Grand Total
Commercial		4	2			10	3	19
Agricultural		1			1		1	3
Mixed Use	1	4			1	9	1	16
Other		7				9		16
Grand Total	**1**	**16**	**2**	**0**	**2**	**28**	**5**	**54**

Sources: O'Connor 2018, Garrison 2018, County of San Mateo 2018, City of Half Moon Bay 2019, City of Pacifica 2019.

2.4 PROJECTIONS CONTAINED WITHIN PLANNING DOCUMENTS AND ASSOCIATED EIRS (PROJECTIONS METHOD)

A program EIR is defined in Section 15168 of the State CEQA Guidelines as: "[An EIR addressing a] series of actions that can be characterized as one large project and are related either:

1. Geographically,
2. As logical parts in the chain of contemplated actions,
3. In connection with the issuance of rules, regulations, plans, or other general criteria to govern the conduct of a continuing program, or
4. As individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental impacts which can be mitigated in similar ways."

When available and current, the analyses contained in program EIR prepared for local agency general plans, regional plans or for Local Coastal Program (LCP) updates can be useful in assessing cumulative impacts. Because local agency general plans, regional plans, and local coastal programs regulate and/or plan geographically broad areas, the EIRs prepared for these documents can contain cumulative impact analyses that include all or a large portion of the geographic area of effect for cumulative impact analyses. Several plans and programs exist within the geographic area being used for the assessment of cumulative impacts of the Cypress Point project, including: the General Plans of the City of Pacifica, the City of Half Moon Bay, and the County of San Mateo, the San Mateo County LCP, and Plan Bay Area 2040. For the reasons described below, only one of these documents, the Plan Bay Area 2040 EIR, was suitable for use in supplementing the information from the list method for this cumulative analysis.

2.4.1 PLAN BAY AREA 2040 EIR

Plan Bay Area 2040 is an integrated long-range transportation and land use plan published by the Metropolitan Transportation Commission (MTC) and the Association of Bay Area Governments (ABAG) in 2018. As required by Senate Bill 375, the Plan Bay Area 2040 serves as a Sustainable Communities Strategy (SCS) that integrates transportation, land use and housing to meet the greenhouse gas reduction targets set by the California Air Resources Board (CARB). Plan Bay Area 2040 identifies how the Bay Area will grow through the year 2040 and identifies transportation and land use strategies to enable a more sustainable, equitable and economically vibrant future. Plan Bay Area 2040 sets forth goals, a proposed growth pattern and supporting transportation investment strategy, and key actions needed to address ongoing and long-term regional challenges. (MTC/ABAG 2017a)

To evaluate the environmental effects of implementing Plan Bay Area 2040, the MTC and ABAG completed a program EIR. The Plan Bay Area 2040 EIR presented a programmatic assessment of the potential impacts of the proposed Plan, focusing on the entire set of projects and programs contained in the Plan. Impacts were described from a regional and local perspective, as applicable. Where appropriate, the EIR also provided a county-by-county assessment (MTC/ABAG 2017b).

Plan Bay Area forecasts of growth were based on current General Plan and zoning designations for each parcel of land (MTC and ABAG 2017c). Because the current General Plan, Local Coastal Program, and zoning designations for the project site allow higher levels of development than are being requested under the proposed project, the projections and impact analyses contained in the Plan Bay Area 2040 overstate the contribution of this parcel to cumulative impacts. Therefore, the contribution of the proposed project to cumulative impacts is contained, if slightly overstated, by the analysis in the Plan Bay Area 2040 EIR.

A geographic information system (GIS) was used to digitally overlay the projected land use growth footprint (net new acres of potential development) associated with forecasted development and the transportation projects footprint assumed for the transportation projects over resource-related data. Results were presented, where relevant, for the region, and for each county. Where impacts were quantified through modeling or GIS analysis, they were reported at the regional, and county levels in tables and in the text. Information provided by county includes both incorporated and unincorporated areas in the county (MTC/ABAG 2017b).

The analysis in the Plan Bay Area 2040 EIR generally assumed 2015 as the base year (existing conditions). The EIR used the most current available data or data for the year closest to 2015, based on the degree that information was available from across the region. The EIR assumed that projects and programs identified in the Plan were fully implemented by 2040. Plan Bay Area forecasts of growth were based on current General Plan, zoning, and Local Coastal Program designations for each parcel of land (MTC and ABAG 2017c). Therefore, the Plan Bay Area 2040 EIR provides an appropriate tool for analyzing cumulative impacts under the projections method.

The environmental analysis included for each environmental topic area in the Plan Bay Area 2040 EIR is a cumulative analysis compliant with the requirements of CEQA and the CEQA Guidelines. The lead agencies for projects analyzed in the Plan Bay Area 2040 program EIR may use it as the basis for cumulative analysis of specific project impacts, together with the projected growth in the region. The cumulative assessment presented in this Cypress Point cumulative impact analysis report relies upon the projections and environmental information contained within the Plan Bay Area 2040 EIR for those environmental topic areas where the projection method is used, as indicated in Table 1.

2.4.2 General Plan EIRs

This analysis considered whether any General Plan EIRs for jurisdictions in the vicinity of the Project Site could be used for projections to inform the cumulative impacts analysis. As explained below, there are no General Plan EIRs that can be used for this purpose.

The City of Pacifica General Plan has not been comprehensively updated since its adoption in 1980. An EIR for this 1980 General Plan is not available. The City of Pacifica is in the process of updating its General Plan and LCP, and preparing an EIR for these documents. However, none of these documents has yet been finalized or adopted. The City's adopted General Plan and EIR are outdated, and the City's planning area includes only a small portion of the cumulative

impact assessment area for the Cypress Point project. Accordingly, the adopted City of Pacifica General Plan EIR was not used for projections to inform the cumulative impacts analysis.

The current City of Half Moon Bay General Plan exists as a series of general plan elements, some of which date to 1991 (noise and safety), while others have been updated more recently (Circulation Plan [2013] and Housing [2015]). An EIR for the general plan is not available. The City of Half Moon Bay is currently in the process of updating both its General Plan and its LCP, an effort known as Plan Half Moon Bay, but this process has not yet been completed and the new EIR has not yet been published. Accordingly, the adopted City of Half Moon Bay General Plan EIR was not used for projections to inform the cumulative impacts analysis.

The County of San Mateo General Plan was last updated in 1986. An EIR for this 1986 General Plan is not available. The County's adopted General Plan is quite old and no General Plan EIR is available. Accordingly, the adopted County of San Mateo General Plan EIR was not used for projections to inform the cumulative impacts analysis.

In late 1980, the San Mateo County Board of Supervisors and the California Coastal Commission approved the San Mateo County Local Coastal Program (LCP). In 2012, the Coastal Commission approved an amendment of the County LCP for the Midcoast region. The Coastal Commission complied with CEQA by preparing a CEQA Equivalent Documents for both the 1980 LCP and the 2012 Midcoast LCP amendment. However, the environmental information contained in the 1980 LCP documentation is dated, and the area assessed in the 2012 Midcoast LCP amendment includes only a portion of the cumulative evaluation area defined in Table 2. Accordingly, the adopted LCP CEQA Equivalent Documents were not used for projections to inform the cumulative impacts analysis.

In summary, for the reasons outlined above, no additional program EIRs prepared for General Plans in the cumulative study area or for the LCP were available to use to evaluate the cumulative impacts of the proposed project.

3. IMPACTS AND MITIGATION MEASURES

This section evaluates the contribution of the proposed project to cumulative impacts on a variety of resource topics.

3.1 AESTHETICS

Using the list method, the analysis of cumulative impacts related to aesthetics and visual resources evaluates the potential for the cumulative projects in aggregate to affect the visual resources of the Midcoast area, based on the nature of each project and its location. The analysis also evaluates the contribution of the Cypress Point project to any aggregate change in visual resources.

Although urban development in the Midcoast area of San Mateo County could result in a cumulative adverse change in the visual environment, the majority of the reasonably

foreseeable projects listed in Tables 3 and 4 would be located within or adjacent to existing urban areas in Pacifica, Half Moon Bay or unincorporated communities within San Mateo County. None of these projects are near enough to the proposed project to be within its viewshed. All of the projects in Pacifica or Half Moon Bay are located both distant from the proposed project, and separated by intervening topography and vegetation. Similarly, while the projects within Montara and Moss Beach in unincorporated San Mateo County are closer to the proposed project, they are also separated by topography, vegetation, and other buildings. None could be viewed from the project site, nor could the proposed project be visible to any of these projects.

Each of the potential projects listed in Tables 3 and 4, including the proposed Cypress Point development, would be required to be consistent with the San Mateo County 1986 General Plan, the San Mateo County Local Coastal Program, the San Mateo County Community Design Manual, and Section 6565.1 of the San Mateo County Zoning Regulations (Design Review District). All of these documents contain policies intended to protect visual resources in the Coastal Zone.

Because the foreseeable projects would be visually separated from one another by topography and vegetation, would be located primarily within existing urban areas, and would be subject to County siting and design requirements, this would be a less-than-significant cumulative impact.

Project impacts related to scenic vistas or other scenic resources, visual character, and light and glare would be limited to the project site and areas immediately surrounding the site. The *Visual Resources Report* prepared for the proposed project concluded that the proposed project would not result in significant impacts to scenic vistas, scenic resources, degrade the visual character of the area, or be adjacent to a scenic highway or within a scenic corridor. The proposed project would result in a significant impact related to creating new sources of light and glare and be within a Design Review District, but these impacts were reduced to less than significant through the adoption of mitigation measures.

Thus, the proposed project in combination within other probable projects would not result in a cumulatively considerable contribution to the less-than-significant cumulative impact related to aesthetics, and no additional mitigation measures would be required.

3.2 AGRICULTURE AND FORESTRY RESOURCES

The project site does not contain any agricultural or forestry resources. Therefore, it would not have any project-level impacts to agricultural and forestry resources, and would therefore not make any contribution to a cumulative impact on these resources, and no mitigation measures would be required.

3.3 AIR QUALITY

The cumulative analysis of air quality employs both the projection and the list methods. The analysis of the project's contribution to the regional pollutant burden is assessed using the

projection method, including reliance upon the trip generation estimates established in the traffic study prepared for the Cypress Point project. For local pollutants such as construction dust, the list method is used to identify projects in the vicinity of the project that could combine construction emissions with those of the Cypress Point project.

Regarding regional pollutants, the San Francisco Bay Area is currently designated as a nonattainment area for state and national ozone and particulate matter standards. By its very nature, air pollution is largely a cumulative impact. Past, present and future development contribute on a cumulative basis to the region's adverse air quality impacts and the region's nonattainment status. If a project's contribution to the cumulative impact were considerable, as measured by the emissions in comparison with significance thresholds, then the project's impact on air quality would be considered significant.

In developing thresholds of significance for air pollutants, BAAQMD considered the emission levels above which a project's individual emissions would be cumulatively considerable. If a project exceeds the identified significance thresholds, its emissions would be cumulatively considerable, resulting in significant adverse air quality impacts to the region's existing air quality conditions. Emissions from construction and operation of the proposed project are below significance thresholds identified by BAAQMD. Therefore, additional analysis to assess cumulative impacts is unnecessary.

The local health risk impacts of the proposed project were evaluated using the list method. Construction of the project would have significant impacts (prior to adoption of mitigation) because the chance of contracting cancer would increase by greater than 10 chances per million and the increase in annual PM2.5 concentrations would be greater than 0.3µg/m^3. These levels are above the BAAQMD thresholds for measuring significant impacts from sources of toxic air contaminant and air pollutant emissions. When considering the effect of other sources of TAC/air pollutant emissions, this increase in health risk would be considered cumulatively considerable. However, mitigation measures AQ-1 and AQ-2 would reduce this impact to a less-than-significant level. A second method for evaluating health risk is to combine the contribution of cancer risk and annual PM2.5 concentrations from the project with nearby sources and compare the result with the thresholds set forth above. BAAQMD recommends including projects within a 1,000-foot radius of the project site and comparing the computed impacts to their recommended cumulative risk thresholds. Because none of the probable projects listed on Table 3 are within 1,000 feet of the proposed Cypress Point project, there would be no cumulative impact for the project to contribute to, and no additional mitigation would be required.

3.4 BIOLOGICAL RESOURCES

The analysis of cumulative impacts on biological resources uses the projection method by incorporating the growth forecasts and cumulative impact conclusions of the program EIR for the Plan Bay Area 2040. The Plan Bay Area 2040 EIR, evaluated the potential effects of implementing urban development and transportation projects identified by the Plan for the nine-county San Francisco Bay Area, including San Mateo County. As identified in the EIR,

although relatively little development was forecast for the San Mateo coast through 2040, projected development within the Bay Area, including San Mateo County, would result in adverse cumulative effects to the following biological resources:

- Plant and animal species identified as candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife, the U.S. Fish and Wildlife Services, or the National Marine Fisheries Service;
- Designated critical habitat for federally listed plant and wildlife species;
- Riparian habitat, federally protected wetlands as defined by Section 404 of the Clean Water Act (including but not limited to marsh, vernal pool, coastal), or other sensitive natural communities identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service;
- Reductions in the habitat of a fish or wildlife species; a drop in fish or wildlife populations below self-sustaining levels; elimination of a plant or animal community; or a reduction in the number or restriction in the range of an endangered, rare, or threatened species.

Within the Midcoast area, the EIR identified the following sensitive biological resources: California red-legged frog; Steelhead – Central Coast ESU; Contra Costa Goldfields; and the Sugarloaf Mountain – Montara Mountain Essential Connectivity Area.

The proposed project would not have a significant impact on any biological resources (De Novo 2018). No special-status species occupy the project site, nor does the site contain any Environmentally Sensitive Habitat Areas or migration corridors. The habitat that does exist on the site is of low quality. Further, measures have been recommended to mitigate for any potential impacts to nesting raptor species, should any be identified during pre-construction surveys.

Therefore, the proposed project would not make a cumulatively considerable contribution to any identified cumulative impact on biological resources because the impacts of the proposed project on biological resources are minor, the project would not affect any of the sensitive resources identified for the Midcoast area, and project specific effects would be further reduced by the implementation of identified mitigation measures. The proposed Cypress Point project would not make a cumulatively considerable contribution to the significant cumulative impacts to the biological resources cited above, and no additional mitigation would be required.

3.5 CULTURAL RESOURCES

Using the list method, the analysis of cumulative impacts related to cultural resources evaluates the potential for the cumulative projects in aggregate to adversely affect cultural resources within the Midcoast area, based on the nature of each project and its location. The analysis also evaluates the contribution of the Cypress Point project to any aggregate change in the condition of cultural resources within the cumulative impact area.

Implementation of the project, in combination with the foreseeable projects listed in Tables 3 and 4, would result in the development of mixed-use, residential, commercial, industrial, and park land uses in unincorporated County of San Mateo, the City of Pacifica, and the City of Half Moon Bay. Impacts to cultural resources are site-specific and are assessed on a site-by-site basis. The extent of the cultural resources (if any) that occur at the sites of the related projects is unknown, and thus, it is not known whether any of the probable projects would result in significant impacts to cultural resources. However, such determinations would be made on a case-by-case basis and, if necessary, the applicants of each reasonably foreseeable project would be required to implement the appropriate mitigation measures. Thus, implementation of the listed projects, together with the proposed Cypress Point project, would not result in a significant cumulative impact.

Archaeological resources (a midden site) were identified on the project site and could be disrupted by project construction. However, with implementation of previously identified mitigation, potential impacts to these resources would be less than significant. Thus, given that the project's cultural resources impacts can be completely mitigated, the proposed project's contribution to a less than significant cumulative impact would not be cumulatively considerable. No additional mitigation would be required.

3.6 ENERGY

While the project would incrementally contribute, in addition to other cumulative projects, to the regional demand for energy (electricity, natural gas, gasoline, and diesel fuel), the project's energy impacts would not be individually considerable. As indicated in the Energy technical report, the project's annual electricity usage would represent approximately 0.00039 percent of PG&E's electricity sales in 2017 and the project's natural gas usage would represent approximately 0.000670 percent of PG&E's natural gas sales in 2017. Electricity and natural gas are provided to end users on demand, and delivery amount is a function of use. During peak usage, more resources can be made available to users in order to avoid any potential outages. While the management of energy resources is a Statewide challenge, and cumulative demand for such resources could be considered cumulatively significant, the project's energy consumption is small and it includes many features that would minimize energy consumption.

Further, the Plan Bay Area 2040 Draft Environmental Impact Report (Metropolitan Transportation Commission/Association of Bay Area Governments 2017b) contains an analysis of the impact of growth and transportation improvements in the 9-county Bay Area, including San Mateo County. This analysis is cumulative by its nature, and concludes that implementation of the plan "would not result in wasteful, inefficient, or unnecessary consumption of energy, during project construction or operation." Therefore, the cumulative impact related to energy would be less than significant, and the Cypress Point project would not make a considerable contribution to a significant cumulative impact related to energy resources, and no mitigation is required.

3.7 GEOLOGY AND SOILS

Impacts related to geology and soils are generally site-specific, related to the seismic hazards and soil conditions on a project site. They generally are not related to impacts in other locations. Such impacts do not normally result in cumulative impacts to these resources. Thus, the proposed project would not contribute to a cumulative impact related to geology and soils.

3.8 GREENHOUSE GAS EMISSIONS

As discussed in *Cypress Point Affordable Housing Project Air Quality and Greenhouse Gas Emissions Assessment*, impacts of greenhouse gas (GHG) emissions and climate change are inherently cumulative in nature because no single project could generate GHG emissions that would noticeably change the global average temperature or alter the global climate. However, individual projects may contribute to GHG emissions from past, present, and future projects to contribute substantially to the effect of global climate change and its associated environmental impacts.

The GHG emissions of both the construction and operations of the proposed project are estimated to be less than the Bay Area Air Quality Management District screening level, indicating that they are so small as to be negligible. Projects below this screening level are not required to undertake a detailed emissions analysis or adopt project-specific mitigation under BAAQMD rules. However, such projects are required to implement generally applicable state, regional, and local standards regarding energy use, sustainability, and greenhouse gas emissions. Therefore, the contribution of the proposed project to cumulative GHG emissions would be less than considerable. Further, as determined in the *Air Quality & Greenhouse Gas Emissions Assessment*, the proposed project is consistent with the Plan Bay Area 2040, the plan prepared by the Association of Bay Area Governments and the Metropolitan Transportation Commission to comply with state laws requiring a reduction in greenhouse gas emissions for the Bay Area. Thus, the proposed project would not make a considerable contribution to a cumulative impact related to greenhouse gas emissions. No additional mitigation, beyond compliance with State, regional, and local requirements, would be necessary.

3.9 HAZARDS AND HAZARDOUS MATERIALS

Using the list method, the analysis of cumulative impacts related to hazards and hazardous materials evaluates the potential for the cumulative projects in aggregate to have impacts related to hazards and hazardous materials within the Midcoast area, including: the transport, use or disposal of hazardous materials; the emission or handling of hazardous materials near an existing or proposed school; the location of the project on a known hazardous waste site; exposure of the site to aircraft hazards; interference with an emergency response or evacuation plan; exposure to wildland fire hazards; and exposure to flood or tsunami hazards. The impacts of the cumulative projects are based on the nature of each project and its location. The analysis also evaluates the contribution of the Cypress Point project to any aggregate change in hazards.

Impacts related to hazards and hazardous materials are generally site-specific, not cumulative in nature. For the probable cumulative projects indicated on Tables 3 and 4, the identified developments primarily consist of residential, commercial, recreation, and public infrastructure maintenance and repair uses. None of these uses would be expected to transport, use, or generate substantial volumes of hazardous materials. To the extent that any of the probable projects did use hazardous materials and are located near a school, this would be a site-specific effect. The location of a cumulative project on a known contamination site, or exposure to aircraft overflights, wildland fire hazards, flooding, or tsunami risk would also be site-specific. Thus, there would be a less-than significant cumulative impact to hazards resulting from the probable cumulative projects.

As indicated in the *Preliminary Environmental Evaluation Report*, the proposed project would not have any significant impacts related to hazards and hazardous materials. The only hazards identified with the proposed project are the presence of toxic materials such as lead associated with the prior military use of the site, the presence of an abandoned well on the site, and the transport and use of hazardous materials during construction of the project. These hazards have been abated, or Best Management Practices have been identified that would prevent spills and emissions during construction. For these reasons, the proposed project would not make a cumulatively considerable contribution to a less-than-significant cumulative impact related to hazards or hazardous materials, and no additional mitigation is required.

3.10 HYDROLOGY AND WATER QUALITY

Using the list method, the analysis of cumulative impacts evaluates the potential for the reasonably foreseeable projects in Tables 3 and 4 in aggregate to affect hydrology and water quality within the Montara Creek watershed, based on the nature of each project and its location. The analysis also evaluates the contribution of the Cypress Point project to any aggregate change in hydrology and water quality.

In order to comply with the State Water Resources Control Board's Special Protections of Areas of Special Biological Significance (ASBS), the San Mateo County Planning and Building Department regulates private stormwater discharges into the Montara Creek watershed by enforcing the following requirements:

- Discharges may occur only during the wet weather season (Oct. 1 through April 30) and must 1) be composed of only stormwater, 2) be free of pollutants, and 3) must not alter natural ocean water quality in the ASBS.
- All new point source discharges into the ASBS shall either be retained on-site or shall be treated on-site prior to entering a County storm drain.
- Discharge treatment and management measures are required to be identified on project plans and implemented during construction and future maintenance.
- For properties served by private septic, pool and/or spa discharge shall be dechlorinated and slowly discharged to landscaped areas (determined adequate to support the volume).

- Erosion and sediment control plans are required to be submitted for review and approval for projects within the ASBS watershed that involve soil disturbance and are subject to a building or grading permit.
- Pursuant to the Water Board's General Exception to the California Ocean Plan with Special Protections (Attachment B, Section A.2.c.1), weekly construction site inspections are required for all construction sites within the ASBS watershed that involve soil disturbance and are subject to a building or grading permit (considered Stormwater Regulated Construction Sites [SWRS]).
- On-site areas (new or replaced) used for car washing shall drain to adequately-sized vegetative areas or other on-site treatment facilities, or occur on permeable surfaces (e.g. gravel, grass), and should use as little detergents as necessary. Phosphate free or biodegradable soap is highly encouraged. Discharge to the sanitary sewer is prohibited (Montara Water and Sanitary Code). (SMC 2018a)

Additionally, as required by the Municipal Regional Permit (MRP) and the authority given to the Clean Water Program San Mateo, development projects creating one or more acres of impervious area in non-exempt regions of the County are required to implement a Hydromodification Management (HM) program to attenuate runoff associated with project implementation so it is no greater than under pre-project conditions. The specific goal of the HM program is to control the post-project flow to match pre-project runoff flow rates and durations ranging from 10 percent of the pre-project 2-year peak flow up to the pre-project 10-year peak flow.

The floodplain of Montara Creek is limited to the immediate vicinity of the creek channel as it flows adjacent to the community of Montara (FEMA 2017). Outside of the Montara Creek channel, the community of Montara and adjacent areas of Moss Beach are located in Flood Zone X according the Federal Emergency Management Agency (FEMA 2017). In this area of San Mateo County, Flood Zone X delineates areas of minimal flood hazards (FEMA 2017). In the vicinity of the Montara Creek watershed, the areas subject to tsunami hazards are limited to the immediate coast (Cal EMA 2009) The Montara Creek watershed is not located in an area subject to inundation from dam failure (San Mateo County 2005).

Two probable projects, in addition to the proposed Cypress Point project, are located within the Montara Creek watershed at 178 7th Street and 1390 Main Street, Montara. None of the three projects are located immediately adjacent to Montara Creek or the coast.

Together, these three projects could result in the discharge of urban pollutants during both the construction and operational phases. However, all three projects would be subject to the ASBS pollution control requirements cited previously, in addition to standard San Mateo County requirements regarding stormwater volume and water quality controls. None of the three projects would be exposed to hazards posed by flooding, tsunami, or dam failure. For these reasons, implementation of these three projects would result in a less-than-significant cumulative impact related to hydrology.

As proposed, the Cypress Point project would have the potential to increase stormwater runoff from the project site and increase the amount of pollutants entering Montara Creek due to the conversion of pervious to impervious surfaces on the project site, and the development of urban uses. However, with implementation of Mitigation Measure HWQ-1 (identified in the *Preliminary Environmental Evaluation Report* prepared for the project), implementation of the Cypress Point project would not result in an increase in stormwater runoff or an increase in pollutant runoff, because the bio-retention ponds created by Mitigation Measure HWQ-1 would retain stormwater to avoid any increase in runoff compared to pre-project conditions, and would remove pollutants from the runoff. The Cypress Point project also would not be exposed to hazards posed by flooding, tsunami, or dam failure. Based on the foregoing, the project would not make a cumulatively considerable contribution to this less-than-significant cumulative effect. No additional mitigation would be required.

3.11 LAND USE AND PLANNING

Land uses in the unincorporated Midcoast area of San Mateo County are regulated by the San Mateo County LCP and the County's General Plan and zoning code. Land uses within the cities of Pacifica and Half Moon Bay area regulated by the LCPs and the General Plans and zoning codes of each of the two jurisdictions. Proposed development projects within each of these jurisdictions may not be approved unless they are consistent with the land use designations and policies set forth in each agency's LCP, General Plan, and zoning code. In cases where a project may be inconsistent as proposed, the agency may consider an amendment to the LCP, General Plan, or zoning code to permit the proposed use.

As identified in Tables 3 and 4, there are numerous reasonably foreseeable land use and infrastructure projects that are approved but unbuilt, or under consideration by San Mateo County and the cities of Half Moon Bay and Pacifica. Generally, these projects would be consistent with land use plans and policies, and with adjacent existing uses. However, implementation of the projects listed in Tables 3 and 4 could result in inconsistencies with adopted land use policies and regulations, such as a general intensification of land use and development density in the Midcoast area, compared to what is allowed under the LCP. However, before being approved, each project will be required to conform to the zoning, LCP, and General Plan land use designations for its project site, and may also be subject to conditions of approval to ensure substantial conformance to adopted policies. As such, development of the proposed project and related projects is not anticipated to substantially conflict with the intent of the LCP or the County's General Plan regarding the future development of the area. Neither would they conflict with other land use regulations required to be consistent with the General Plan, and the zoning code, so approval of these projects would not be expected to result in a significant cumulative impact with respect to land use.

As proposed, the Cypress Point project would be inconsistent with aspects of the San Mateo County LCP and the San Mateo County General Plan. To provide consistency with these regulatory documents, MidPen has requested that the Coastal Commission and San Mateo County take the following actions:

Coastal Commission:

- Amend the LCP Implementation Plan and existing Planned Unit Development (PUD) for the site to reduce the number of units from 148 to 71;
- Amend LCP Land Use Plan and San Mateo County's General Plan to change the site's zoning designation from Medium-High Density Residential to Medium Density Residential; and
- Amend section 3.15(d) of the LCP to allow for 100% of units, apart from a resident manager's unit, to serve low- or moderate-income households.

With these approvals, the project would be consistent with applicable land use plans.

The site is designated as Medium-High Density Residential (RD-2) in the San Mateo County LCP, which allows for development at densities from 8.1 to 16.0 units per acre. The site is defined as infill in the LCP, and designated as a priority development site for affordable housing in the San Mateo County Local Coastal Program Policies document (SMC 2013a). The site is also designated as an affordable housing opportunity site under the San Mateo County Housing Element. (SMC 2015)

The proposed Cypress Point project would be located in an existing residential neighborhood; existing and planned surrounding land uses would continue to include residential and open space uses. With approval of the requested entitlements by the Coastal Commission and San Mateo County, the project would be consistent with the land use designations of the LCP and County General Plan. For these reasons, implementation of the Cypress Point project would not make a cumulatively considerable contribution to this less-than-significant cumulative impact, and no mitigation measures would be required.

3.12 MINERAL RESOURCES

The project site does not contain any mineral resources. Therefore, it would not make any contribution to a cumulative impact on these resources, and no cumulative mitigation measures would be necessary.

3.13 NOISE

Because sound levels decrease rapidly over distance, noise generated from projects distant from the proposed project would not contribute significantly to noise levels at the project site, and visa versa. Therefore, the evaluation of cumulative impacts related to noise focuses on the following:

- Contribution of project construction to cumulative noise impacts (list method);
- Increased noise generated by cumulative traffic growth on SR 1 (projection method);
- Consistency of the proposed project with County noise ordinance requirements with respect to interior (45 dBA CNEL or less) and exterior (60 dBA CNEL or less) noise level standards.

Construction Noise. The proposed project could contribute to cumulative noise impacts during the construction phase (due to construction of other projects at the same time). For the cumulative analysis, other construction projects within 500 feet on the project site could generate noise levels that would have the potential to result in a cumulative construction noise impact on the project site and vicinity, and vice versa. Beyond 500 feet, the construction noise levels would drop off so much that it would not register at the project site. Foreseeable projects in both Pacifica and Half Moon Bay are more than 4 miles from the project site, and are separated by intervening ridges and vegetation, so it is extremely unlikely that those projects would contribute construction noise that could be heard in the project vicinity. Similarly, the foreseeable projects within unincorporated San Mateo County are in Montara and Princeton and are ½ mile or more from the project site, so they would not be heard in the project vicinity. Project construction would be temporary in nature (less than 2 years) and hours for construction activity would be limited per San Mateo County code (Section 4.88.360, San Mateo County Code of Ordinances). Further, the construction-related impacts of the proposed project were found to be less than significant with implementation of Mitigation Measure NOISE-1. Thus, there would not be a cumulative impact due to construction noise, and the project would not make a cumulatively considerable contribution to this less-than-significant cumulative impact. No additional mitigation would be required.

Increased Noise From Traffic Growth on SR 1. This evaluation was conducted to determine if the proposed project would contribute to noise impacts at the project site and, by extension, for neighboring residences, by increasing noise from increased traffic volumes on SR 1. A significant cumulative impact would occur if: noise levels without the project exceed 55 dBA CNEL; the cumulative traffic noise levels increase by 3 dBA CNEL or greater compared to existing levels; and the project makes a "cumulatively considerable" contribution to the overall traffic noise increase (an increase of 1 dBA CNEL or more).

Future noise on the project site caused by increases in traffic volumes on SR 1 were calculated by comparing the Cumulative traffic volumes and the Cumulative Plus Project volumes to Existing traffic volumes as provided in *Cypress Point Traffic Impact Analysis*. To estimate the future noise environment at the project site, noise levels resulting from these traffic increases were applied to the measured existing noise levels. The increases in traffic volumes would result in a traffic noise level increase of 2 dBA CNEL above existing conditions along Highway 1. The future unmitigated ambient noise environment at the project site would range from 53 to 57 dBA CNEL, the upper range of which would be above the 55 dBA CNEL threshold. However, the background increase in noise would be less than the 3 dBA CNEL threshold, and the contribution of the proposed project would be less than 1 dBA CNEL, also below the cumulative threshold. Because the increases in traffic noise would not meet cumulative thresholds, the cumulative impact to traffic noise would be less than significant, and implementation of the Cypress Point project would not make a cumulatively considerable contribution to this impact. No additional mitigation would be required.

Compliance with County Noise Standards. The proposed project includes common residential outdoor use areas, including a community garden, a children's play area, upper and lower

greens, and BBQ areas. As noted above, the County's acceptable exterior noise level standard is 60 dBA CNEL or less. The future exterior noise exposure at the site would be considered compatible with the proposed residential land uses, as noise levels are calculated to reach 57 dBA CNEL, below the 60 dBA CNEL threshold. By extension, exterior noise levels at neighboring residents would also be below the threshold. The additional trips generated by the proposed project (45 pm peak hour trips) would be so small compared to background traffic on SR 1 (approximately 2,000 peak hour vehicles in 2016), that the resulting noise level increase would be so small as to be immeasurable. The effect would be even smaller in the future, as background traffic volumes on SR 1 increase over time.

The County requires that residential interior noise levels be maintained at 45 dBA CNEL or less. The residences closest to Highway 1 along the western boundary of the project site would experience the greatest future exterior traffic noise exposure, which would be up to 57 dBA CNEL. Interior noise levels would vary depending upon the design of the buildings (relative window area to wall area) and the selected construction materials and methods. Standard residential construction provides approximately 15 dBA of exterior to interior noise reduction, assuming the windows are partially open for ventilation. Standard construction with the windows closed provides approximately 20 to 25 dBA of noise reduction in interior spaces. Where exterior noise levels range from 60 to 65 dBA CNEL, the inclusion of adequate forced-air mechanical ventilation is often the method selected to reduce interior noise levels to acceptable levels by closing the windows to control noise.

For this project, the set-back from Highway 1 is sufficient to ensure that the interior noise level standard would be met assuming standard construction methods with the windows open for ventilation. No additional noise insulation features (e.g., sound-rated construction methods) would be required. Because the proposed project would generate a very small number of additional trips, it would not create a discernable increase in traffic noise for project neighbors.

The proposed project would not make a cumulatively considerable contribution to a cumulative noise impact, either during project construction, or by contributing to increased traffic noise levels, and no additional mitigation measures would be required.

3.14 POPULATION AND HOUSING

The analysis of cumulative effects related to population and housing uses both the projections and list methods. Of the projects identified in Tables 3 and 4, the preponderance are residential uses, with a few employment generating, generally commercial uses. Note that several of the projects are mixed use projects, containing both residential and employment generating uses.

Table 5 provides information regarding population change within the Midcoast area, while Table 6 provides similar information regarding housing.

Any housing-induced population growth of the probable projects would not be relevant to the proposed Cypress Point project since the project proposes affordable housing, which has been identified as an unmet need in the LCP and County Housing Element. Based on the projects

described in Tables 3 and 4, there are no similar residential projects in the cumulative study area. There are a number of projects approved or under consideration within the Midcoast area that could result in induced growth either by providing housing or employment. However, the projects listed in Tables 3 and 4 are included in the population and housing projections in Tables 5 and 6, as all projects are required to be in compliance with the LCP for the jurisdiction in which it is located. Further, because the Cypress Point project would provide housing for people who otherwise would not be able to afford housing on the Midcoast, because the project is proposed at roughly half the density allowed by the current zoning and LCP designation, and because it is consistent with other adopted plans and policies, it would not make a cumulatively considerable contribution related to population and housing. This would be a less-than-significant impact, and no mitigation would be required.

Table 5 Population Change within the San Mateo County Midcoast

Location	Population		Percent Change – 2000 to 2010
	2000	2010	
Half Moon Bay	11,842	11,228[1]	-5.2
Pacifica	38,390	37,234	-3.0
Montara CDP[2]	2,950	2,909	-1.0
Moss Beach CDP[2,3]	1,953	3,103	58.9
El Granada CDP[3]	5,724	5,467	-4.7

Notes
[1] Data for 2011
[2] CDP = Census Designated Place
[3] Data inaccurate due to changes in census geography

Sources: General Plan Housing Elements for Half Moon Bay (2015), Pacifica (2015), and San Mateo County (2015)

Table 6 Housing Units within the San Mateo County Midcoast

Location	Housing Units	Year of Data
Half Moon Bay	4,257	2011
Pacifica	14,523	2010
Montara CDP[1]	922	2012
Moss Beach CDP[1]	1,149	2012
El Granada CDP[1]	1,991	2012

Notes
[1] CDP = Census Designated Place

Sources: General Plan Housing Elements for Half Moon Bay (2015), Pacifica (2015), and San Mateo County (2015)

3.15 PUBLIC SERVICES AND UTILITIES

3.15.1 PUBLIC SERVICES

The cumulative assessment of public services is based on the list method. The *Public Services and Utilities* report prepared for the proposed project evaluates six public services: 1) police services; 2) fire protection; 3) schools; 4) parks and recreation; 5) libraries; and 6) hospitals. Public utilities for water and wastewater services are evaluated in Section 3.15.2 of this report.

As noted in the *Public Services and Utilities* report, public services such as police services, fire protection, libraries, and hospitals would be adequate to serve the proposed project.

POLICE SERVICES

The foreseeable projects listed in Tables 3 and 4 are located within three different jurisdictions: the cities of Half Moon Bay and Pacifica, and the Midcoast unincorporated areas of San Mateo County. Each of these jurisdictions has their own police services. Pacifica maintains its own city police force; Half Moon Bay contracts with the San Mateo County Sheriff's Department for services. The Midcoast unincorporated areas of San Mateo County, including Moss Beach and Montara, are served by the Sheriff's Department. Police services provided by the Sheriff to Half Moon Bay are subject to a contract between the Department and the City that establishes services offered, and service and staffing levels. Thus, each of the three jurisdictions is provided with differing law enforcement services and service levels. Because each jurisdiction is served by a separate provider or by separate arrangement with a common provider, the effects of the probable projects within one jurisdiction would have no impact to services in the other two areas. For this reason, the analysis of the cumulative effects of the Cypress Point project on police services is limited to the Midcoast unincorporated area of San Mateo County.

As indicated in Tables 3 and 4, there are a number of probable projects in addition to the Cypress Point project in unincorporated San Mateo County. Similar to the proposed project, each of these probable projects would be subject to review by the Sheriff's Department, and would be required to comply with all safety requirements of the Department to adequately address law enforcement service demands. Furthermore, each probable project would contribute additional tax revenue that could be used for commensurate expansion of police services, the hiring of additional sheriff deputies, and the purchase of additional equipment. Therefore, cumulative impacts with respect to police services would be less than significant. Because the proposed Cypress Point project has been determined to have a less than significant impact on police services in the *Public Services and Utilities* report, implementation of the project would not make a cumulatively considerable contribution to this less than significant cumulative impact. No mitigation would be required.

FIRE PROTECTION SERVICES

Similar to police services, different providers serve the different jurisdictions within the San Mateo County Midcoast. Pacifica is served by the North County Fire Authority, which also serves Daly City and Brisbane. The City of Half Moon Bay and the Midcoast areas of San Mateo County, including Moss Beach and Montara, are served by the Coastside Fire Protection District. Thus, the analysis of the cumulative effects of the Cypress Point project on fire protection services is limited to the Midcoast unincorporated area of San Mateo County and the City of Half Moon Bay. As indicated in Tables 3 and 4, there are a number of probable projects in addition to the Cypress Point project that area served by the Coastside Fire Protection District. Of these, most are individual single-family residences to be constructed on existing lots. The others range from public infrastructure to multi-family to commercial and mixed-use developments. As is the case with police services, each of the probable projects would be

individually subject to review by San Mateo County or the City of Half Moon Bay, and the Coastside Fire Protection District, and would be required to comply with all safety requirements of the District to adequately address fire protection service demands. Furthermore, each related project would contribute additional tax revenue that could be used for commensurate expansion of fire protection services, the hiring of additional firefighters, and the purchase of additional equipment. Therefore, cumulative impacts with respect to fire protection services would be less than significant. Because the proposed Cypress Point project has been determined to have a less than significant impact on fire protection services in the *Public Services and Utilities* report, implementation of the project would not make a cumulatively considerable contribution to this less than significant cumulative impact. No mitigation would be required.

SCHOOLS

The City of Pacifica is served by the Pacifica School District. Both the City of Half Moon Bay and the Midcoast area of San Mateo County area served by the Cabrillo Unified School District. Therefore, the analysis of the cumulative effects of the Cypress Point project on schools is limited to the Midcoast unincorporated area of San Mateo County and the City of Half Moon Bay. Implementation of the project in combination with the probable projects identified in Tables 3 and 4 would further increase the demand for school services. However, as with the proposed Cypress Point project, the applicants of the probable projects would be required to pay applicable developer fees to the Cabrillo Unified School District; and payment of these fees would fully mitigate any impact that the probable projects would have on school services, pursuant to Section 65996 of the California Government Code. Therefore, cumulative impacts associated with school services would be less than significant

As discussed in the *Public Services and Utilities* report, according to student yield factors, the proposed 71 new housing units of the Cypress Point project would generate approximately 50 additional students in grades kindergarten through high school who would need to be accommodated in public schools. Students residing in the project would attend Farallone View Elementary School, Manual F. Cunha Intermediate School, and Half Moon Bay High School. These schools have adequate capacity to accommodate students expected to be generated by the Cypress Point Project. Because there is adequate existing capacity to serve students expected to be generated by the Cypress Point project, implementation of the project would not make a cumulatively considerable contribution to this less-than-significant cumulative impact. No mitigation would be necessary.

LIBRARIES

The San Mateo County Library (SMCL) is a Joint Powers Authority (JPA) comprised of the cities of Atherton, Belmont, Brisbane, East Palo Alto, Foster City, Half Moon Bay, Millbrae, Pacifica, Portola Valley, San Carlos, and Woodside, as well as unincorporated areas of the County of San Mateo. The Half Moon Bay Library is the branch closest to the Cypress Point project site. The Half Moon Bay Library serves a 270-square mile area, including the City of Half Moon Bay and the nearby unincorporated Midcoast area, including Half Moon Bay, Moss Beach and Montara.

To meet the projected demand for library services in the Midcoast area, the SMCL is constructing a new library facility in Half Moon Bay. This facility has been designed to provide a variety of library services to meet cumulative needs in the Midcoast area consistent with population and development forecasts. Because of this additional capacity, there would be a less than significant cumulative impact to library services. As discussed in the *Public Services and Utilities* report, implementation of the proposed project would result in a less-than-significant impact on library services. Project implementation would not make a cumulatively considerable contribution to this less-than-significant cumulative impact. No mitigation would be necessary.

HOSPITALS

Hospitals serving San Mateo County include:

- Kaiser Permanente: Redwood City & So. San Francisco
- Mills-Peninsula Health Services: Burlingame & San Mateo
- San Mateo Medical Center: Hospital in San Mateo, clinics in Daly City, Half Moon Bay, Redwood City, and South San Francisco
- Sequoia Hospital: Redwood City
- Seton Medical Center Daly City and Moss Beach

The closest hospital to the Cypress Point project site is the Seton Medical Center Coastside in Moss Beach, approximately one mile southeast of the project site. Seton Medical Center Coastside provides emergency and ancillary services.

Implementation of the Cypress Point project in combination with the probable projects listed in Tables 3 and 4 would further increase the demand for hospital and medical services. Specifically, there would be increased demands for additional hospital and medical services over time. However, given the relatively small size of the proposed project, the demand for such services would not change significantly with implementation of the proposed project and probable projects. As such, implementation of the proposed project and probable projects would not require the construction of new facilities or the expansion of existing facilities to accommodate increased demand for hospital and medical services. Therefore, cumulative impacts associated with hospital and medical services would be less than significant and no mitigation measures are required. As discussed in the *Public Services and Utilities* report, implementation of the proposed project would result in a less-than-significant impact on hospital services. Project implementation would not make a cumulatively considerable contribution to this less-than-significant cumulative impact. No mitigation would be necessary.

3.15.2 PUBLIC UTILITIES

The cumulative assessment of public utilities is based on the projections method. The project area is served by urban levels of all public utilities and services. Water supply, treatment and delivery, and wastewater collection and treatment are evaluated in the following sections.

WATER SERVICE

The Montara Water and Sanitary District (MWSD) provides water, sewer, and trash disposal services to the coastal communities of Montara, Moss Beach, and adjacent areas located north of El Granada and south of the Devil Slide Tunnel, in unincorporated San Mateo County.

MWSD prepared and adopted a 2017 Water System Master Plan Update (2017 Master Plan) to support the long-term resource planning of water supply and water system facilities for the current and future demands of the MWSD, and to create a foundation for MWSD's Capital Improvements Program (CIP). Future demands on the MWSD water system were estimated for various numbers of additional connections. Future demand estimates are based on the following assumptions:

- People that currently reside or own property in the service area but are not yet connected to MWSD will connect to water system, and
- The MWSD will serve new homes being built in the service area in accordance with the *2013 County of San Mateo Local Coastal Program (LCP) Update*. (MWSD 2017)

As noted in the 2017 Master Plan, the water system is able to support the demands of the projected population with a slight deficit appearing after 1,000 new connections are added to the system (MWSD 2017). This would be a significant cumulative impact. However, this would not affect the Cypress Point project since it has a reserved water supply as an affordable housing project pursuant to the Local Coastal Program.

The analysis presented in the 2017 Master Plan also demonstrates that the water system requires improvements to address system deficiencies that exist under future demand scenarios and fire event simulations. The improvements are designed to provide sufficient response under maximum daily operational scenarios, fire flow, and other emergency conditions. These potential improvements make up the District's CIP and include the rehabilitation of the existing infrastructure, addition of new facilities, and implementation of a repair, replacement, and preventive maintenance program. The proposed improvements are categorized Priority Level 1 and Priority Level 2, based on the MWSD CIP prioritization criteria (MWSD 2017).

Priority Level 1 projects almost exclusively address the system deficiencies related to adding new customers to the system, as most of the identified system deficiencies are due to increased demand resulting from adding new connections to the system. Priority Level 1 improvements for new customers include: 1) Water Main Upgrades Program; 2) Existing Well Upgrade Program; 3) New and Upgraded Pressure Reducing Valve Stations Program; 4) Emergency Generator Upgrades Program; 5) Schoolhouse Booster Pump Station Upgrade; 6) Portola Tank Telemetry Upgrade; 7) Develop Additional Supply Reliability; 8) Big Wave North Project Alternative Main Extension Project (MWSD 2017).

Implementation of the Cypress Point project could require that project-specific water transmission facilities necessary to serve the project consistent with the 2017 Master Plan be completed. While it is currently unknown what project-specific facilities will be required, the

MWSD CIP includes Priority Level 1 improvements for new customers, some of which will improve overall service to all future users. The MWSD will require conditions of approval that include project-specific upgrades necessary to connect the proposed project to the existing system. With implementation of the MWSD 2017 Master Plan and CIP, the cumulative impact to water transmission facilities would be less than significant.

The District has planned for the regional infrastructure improvements included in the 2017 Master Plan. The proposed project does not currently include or require any significant off-site infrastructure improvements. In the event infrastructure improvements were needed to support the proposed project, any such improvements would be developed in previously developed rights-of-way. These improvements would be similar to other routine types of improvements undertaken by MWSD and other service providers, and would not result in any significant direct or cumulative impacts. Also, the proposed project would be required to make water distribution improvements consistent with the MWSD Water Master Plan, there would be no cumulatively considerable contribution to this less-than-significant cumulative effect, and no additional mitigation is required.

WASTEWATER COLLECTION AND TREATMENT

Municipal wastewater treatment for approximately 22,000 coastal residents in San Mateo County is provided by the Sewer Authority Mid-Coastside (SAM). The sewer systems of the Granada Sanitary District, the City of Half Moon Bay, and the Montara Water and Sanitary District connect to the pump stations, force mains, and interceptor pipelines owned by SAM. The SAM facilities are collectively known as the Intertie Pipeline System (IPS).

As one of the member agencies of SAM, the MWSD maintains sewage collection facilities, including approximately twenty-five miles of sewer line, 13 major sewer pump stations, and a total of 41 pump stations with 54 installed pumps. All of the Montara sewage is pumped through the IPS by SAM's northern pump station, often referred to as the Montara Pump Station, to the sewage treatment plant located in Half Moon Bay.

The proposed project would not require or result in the construction of new wastewater treatment facilities, or the expansion of existing treatment facilities. SAM has sufficient capacity to accommodate the additional demands for wastewater treatment, and MWSD has adequate capacity for the additional demands for wastewater collection that could result from operation of the Cypress Point project, with implementation of expected MWSD conditions of approval. Because the proposed project is a priority land use that has wastewater service capacity reserved as described in the 2013 San Mateo County LCP, the wastewater treatment demand of the proposed project will be supplied by SAM and MWSD's capacity reserves for priority land uses. There would be a less-than-significant cumulative impact to which the Cypress Point project would make a less than cumulatively considerable contribution. No mitigation is required.

Thus, the project would not make any cumulatively considerable contributions to cumulative service or utility impacts. No cumulative mitigation measures beyond compliance with service provider requirements and standards would be necessary.

3.16 RECREATION

The cumulative impacts assessment of recreation is based on the list method. A number of recreation resources managed by federal, state, and local agencies are located within the Midcoast area. For additional information, see the *Public Services and Utilities Report* and the *Preliminary Environmental Evaluation Report*.

The Midcoast includes the residential communities of Montara, Moss Beach, El Granada, Princeton, and Miramar. Local groups such as the Midcoast Community Council and the Midcoast Park Lands advocated for a system of neighborhood parks in the Midcoast area, which, in part, resulted in the County Board of Supervisors adopting the plan "A Midcoast Recreational Needs Assessment" in 2002. This assessment outlines a strategy to fund and build a system of local parks and recreation areas.

The Midcoast Action Plan Committee (now known as the Midcoast Parks and Recreation Committee (MPRC)) was established in 2007 to assist with the development of an Action Plan with specific funded priorities that would provide better parks and recreation within the Midcoast area. Several of the Action Plan's priority projects are either underway or have been implemented. The improvement of the facilities at Moss Beach Park, located approximately one mile south of the project site, was listed as a priority project in the Action Plan. In 2015, the park was upgraded to add new swing sets and slides to the existing play structure, a bathroom and drinking fountains, improved fencing, and enhanced drainage.

The County Parks budget is augmented by Ordinance Code §2.64.070(a), the Park and Recreation Development Fees Ordinance, which established mitigation fees for new residential development and for residential reconstruction or remodeling projects that increase the size of an existing residence. Additionally, a San Mateo County Sales Tax Increase, Measure A, was approved by voters in San Mateo County in November 2012 to provide funding, among other things, for parks and recreation. Measure K, passed in November 2016, replaced Measure A, and increased the sales tax paid on the purchase of goods and services in San Mateo County by one-half cent for 10 years. In FY 2014-15, Measure A funds provided $2,028,540, or approximately 13 percent of the County's total budget for parks. (County of San Mateo County Manager's Office 2018b)

The region assessed for cumulative impacts to recreation resources is rich in recreational opportunities, and there is no indication that existing facilities would be overused or that new facilities beyond those planned would be necessary to serve cumulative demand. The addition of 71 housing units (and approximately 213 residents) on the project site, in addition to the projects listed in Tables 3 and 4, would not be substantial in relation to the overall projected population for the MidCoast area of approximately 32,000 (San Mateo County 2013) or the much larger number of people visiting the San Mateo Coast from elsewhere. The proposed

project would not result in a substantial increase in the use of or demand for neighborhood or regional parks, or other recreational facilities beyond the uses and demands contemplated by the County of San Mateo General Plan. The County also charges impact fees on all new development to mitigate a project's impacts on park and recreation facilities. These impact fees are used to address the identified future needs for the County's park system.

Based on this information, the cumulative impact to recreation resources from reasonably forseeable development in unincorporated San Mateo County would be less than significant, to which the proposed Cypress Point project would make a less-than-cumulatively considerable contribution, and no mitigation measures beyond complying with agency standards and fees would be required.

3.17 TRAFFIC AND TRANSPORTATION

The evaluation of traffic and transportation impacts uses the projections method. The cumulative traffic impacts analysis for the proposed project was conducted using the San Mateo County Travel Demand Model, developed by the City/County Association of Governments of San Mateo County and the Santa Clara Valley Transportation Authority. This model was used to forecast future traffic volumes at study intersections for the year 2040 (Cumulative No Project Conditions).

The contribution of the proposed project to cumulative impacts was evaluated by comparing operations under Cumulative No Project conditions with operations under Cumulative With Project conditions. The model includes projected future development throughout the region, consistent with regional growth totals projected by the ABAG for the Plan Bay Area. Therefore, the traffic forecasts reflect both growth in Moss Beach and increases in traffic volumes on Highway 1 due to regional growth. Base year (Year 2013) and future year (Year 2040) forecasts were extracted from the model and linearly interpolated to develop growth between the traffic count year (2017) and the current model horizon year (2040). These 2040 volumes represent the Cumulative No Project condition. The Cumulative Conditions analysis also assumes that the intersection of Highway 1 and California Avenue/Wienke Way will be converted from being a stop-controlled intersection to being signalized, based on the Connect the Coastside draft report (DKS 2016), and agreement by County staff. Project trips (as reassigned to account for the closure of the SR 1/Carlos Street intersection), were added to the modeled volumes at this intersection to estimate intersection turning movement volumes to represent Cumulative With Project Conditions.

More details about the methods used in conducting the cumulative impacts analysis for traffic and transportation can be found in the report *Cypress Point Traffic Impact Analysis*.

The proposed project would make a considerable contribution to a cumulative impact at the following intersections by causing operations to fall below County standards:

- **SR 1 and 16th Street** – The Project would increase delay for the critical movement at the intersection by at least 4 seconds per vehicle during the PM peak hour.

- **SR 1 and Carlos Street** – The Project would cause the critical movement at this intersection to fall below the LOS D standard during the AM, PM, and Saturday peak hours.
- **SR 1 and Vallemar Street/Etheldore Street** – The Project would increase delay for the critical movement at the intersection by at least 4 seconds per vehicle during the PM and Saturday peak hours. During the Saturday peak, the Project would cause the LOS to increase to 'E,' but the critical delay would only increase by one second.

No mitigation is available for the impact at the intersection of SR 1 and Carlos Street, so that impact would be significant and unavoidable. Mitigation for the other impacts is proposed, which, if implemented, would reduce these impacts to less than significant. However, because implementation of the mitigation measures requires the approval of other agencies (e.g. Caltrans, SamTrans) and funding which cannot be guaranteed, these mitigation measures are outside the jurisdiction and control of the lead agency, and the analysis concludes that the proposed project would make a considerable contribution to significant and unavoidable cumulative impacts, even with the adoption of proposed mitigation measures.

3.18 TRIBAL CULTURAL RESOURCES

As indicated in the report *Cypress Point Project Cultural Resources Report*, no Tribal Cultural Resources were identified on or near to the project site either through the cultural resources investigation, through outreach to Native American tribes, or as identified by San Mateo County. Therefore, the proposed project would not have any direct impacts on Tribal Cultural Resources, would not contribute to a cumulative impact on this resource, and no mitigation is required.

3.19 WILDFIRE

The area containing the proposed project site is within a Local Responsibility Area, not a State Responsibility Area, but State Responsibility Areas designated as High and Very High are located north and east of the project site (CALFIRE 2007).

Wildland Urban Interface fires occur where combustible vegetation meets combustible structures, combining the hazards associated with wildfires and structure fires. The project site could be vulnerable to these wildland fires, should they occur. New residential structures constructed as part of the proposed project would include fire-resistant features that conform to modern fire and building codes, as well as fire detection or extinguishing systems. These newer residential structures would not be as vulnerable to fire as are older structures. The likelihood that a major structural fire will expand into a wildland fire before it can be brought under control is therefore significantly reduced. Similarly, wildfires will be less able to burn these buildings because of the preventative measures in place. Further, due to the proximity of the project site to the Moss Beach fire station, and the very short expected response time to reported fires, the likelihood of injuries is minimal (SMC 2018c).

A number of other projects listed in Tables 3 and 4 would also be built near State Responsibility Areas designated as High and Very High. However, these other structures will also be required

to conform to modern standards and include fire-resistant features. The proposed project would not substantially impair an adopted emergency response plan or emergency evaluation plan, as the project will be reviewed and approved by the Coastside Fire Protection District before being approved by the County. The proposed project will not exacerbate wildfire risks due to slope or prevailing winds, require the installation or maintenance of infrastructure that may exacerbate fire-risk or result in ongoing impacts to the environment, nor expose people to downstream flooding or landslides resulting from runoff, post-fire instability, or landslides These other projects in Tables 3 and 4 would be built within urban areas, would not result in a cumulative impact related to wildfires and the proposed project would not make a considerable contribution to a significant cumulative impact related to wildfire. No mitigation is required.

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_____, 2013a. Local Coastal Program Policies. June. Table 2.7 Treatment Capacity to be Reserved for Priority Land Uses-Montara Sanitary District; Table 2.17: Amount of Water Capacity to be Reserved for Priority Land uses-Montara Water and Sewer District (Montara/Moss Beach); Table 2.17 Table 2.21: Estimated Buildout Population of LCP Land Use Plan, Page 2.45. Accessed on June 1, 2018 by Raadha Jacobstein of Planning Partners at <https://planning.smcgov.org/documents/local-coastal-program>

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