

**CYPRESS POINT PROJECT  
ALTERNATIVES ANALYSIS**

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**1. ORGANIZATION OF THIS REPORT**

MidPen Housing Corporation (MidPen) is proposing to develop an affordable housing community on a site that has been designated and prioritized for this purpose in the unincorporated community of Moss Beach in San Mateo County. This Alternatives Analysis documents the process involved in the development of alternatives to the proposed project, the screening of potential alternatives based on feasibility, and the evaluation of the environmental impacts of a range of feasible alternatives to the proposed project.

This report begins with a discussion of legal requirements governing the evaluation of alternatives under CEQA. It is followed by a methodology section, which describes the methods and tools used to develop a range of alternatives and screen the alternatives to determine which are feasible. The next section is an analysis of the environmental impacts of the feasible alternatives compared to the proposed project. Finally, the document ends with the identification of the Environmentally Superior Alternative.

**2. PROJECT DESCRIPTION****2.1 LOCATION OF THE PROPOSED PROJECT**

The subject area consists of approximately 10.88 acres of land near the northeast corner of Carlos and Sierra streets in Moss Beach, County of San Mateo (see Figures 1 and 2). The elevation of the project site ranges from approximately 80 to 190 feet above mean sea level (MSL).

**2.2 PROPOSED PROJECT DEVELOPMENT**

Implementation of the proposed Cypress Point project would include the construction of 71 affordable housing units consisting of 18 two-story buildings containing 2-4 units each. The project would also include a single building that would house a general office, manager's office, community room, kitchen, computer room, laundry, and maintenance and storage areas. The project plan (see Figure 3) also includes several outdoor amenities, including: landscaping; a community garden; a children's play area; an upper and a lower green; BBQ areas; and a public walking trail. The site would be graded to develop building pads at elevations from 186 feet MSL for the buildings nearest the easterly site boundary to 154 feet for the buildings nearest Carlos Street. Approximately one-half of the site would be developed, and the remainder would remain in open space.

Much of the existing vegetation on the project site, especially along its perimeters, would remain undisturbed by the proposed project. Areas within the interior of the site that would be cleared during site grading and construction would be revegetated, as shown in Figure 4.



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Base Map Source: ESRI, 2017  
 Map Date: 06/29/2018



Figure 1  
**Project Vicinity**

San Mateo County, CA



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Aerial Source: NAIP (2017)  
Map Date: 06/29/2018

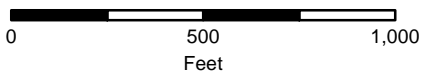


Figure 2  
**Project Location**  
San Mateo County, CA



Source: Pyatok



Figure 3  
Project Features  
San Mateo County, CA



**KEY NOTES**

- ① CYPRESS POINT ENTRY DRIVE
- ② BROAD CANOPY ENTRY TREES
- ③ BIO-RETENTION AREA
- ④ PLAY STRUCTURE (AGES 2-5 YEARS)
- ⑦ SLOPING PATH THROUGH CENTRAL GREEN
- ⑧ SLOPING LAWN
- ⑨ PLANTING - TREES, SHRUBS, AND GRASSES
- ⑩ TRELLIS, SEATING, AND BBQ AREA
- ⑪ WASTE ENCLOSURE (3 TOTAL)
- ⑫ OVERLOOK WITH SEATING
- ⑬ EXISTING GRAVEL ACCESS ROAD
- ⑭ EXISTING WATER TANKS
- ⑮ COMMUNITY GARDEN
- ⑯ PARKING LOT
- ⑰ ACCESSIBLE CROSSING
- ⑱ PLANTED SLOPE
- ⑲ TRAIL FOOT PATH AROUND PERIMETER OF SITE
- ⑳ PATH TO SIERRA STREET
- ㉑ EXISTING TREES
- ㉒ EMERGENCY VEHICLE ROUTE

0 40' 80' 160'

Scale: 1" = 80' - 0"

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Source: Pyatok



**Figure 4**  
**Landscaping Plan**

San Mateo County, CA

### 3. LEGAL REQUIREMENTS

The environmental process being followed by the Coastal Commission in approving the Local Coastal Program Amendment for the proposed project is a Certified Regulatory Program. Consistent with the California Environmental Quality Act (CEQA), the agency follows the environmental review process included in its own regulatory program. While the environmental compliance document being prepared for the proposed project is not called an Environmental Impact Report (EIR), it is appropriately characterized as equivalent to an EIR. Thus, as required by CEQA section 21080.5(d)(3)(A)<sup>1</sup>, the Coastal Commission staff has requested that MidPen and the County evaluate alternatives to the proposed project.

CEQA Section 21080.5(d)(3)(A), and Sections 15252 and 15253 of the CEQA Guidelines (California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000–15387) require the prevention or avoidance of avoidable significant impacts to the environment by requiring changes to a project through the use of feasible alternatives or mitigation measures.

Under Section 15126.6 of the CEQA Guidelines, an EIR is required to include an analysis of a reasonable range of alternatives which:

- Attain most of the basic objectives of the proposed project;
- Substantially reduce one or more of the environmental impacts of the proposed project; and
- Are feasible.

Further, an EIR must include the following analyses related to alternatives:

- Analysis of a No-Project alternative, which describes the environmental effects of not undertaking the proposed project. This should not be confused with the CEQA baseline, since the No Project Alternative may be evaluated at some future time, while the baseline normally represents existing conditions;
- A meaningful evaluation and analysis of a reasonable range of feasible alternatives, including a comparison of the impacts of the alternatives to those of the proposed project; and
- A description of the alternatives that were considered but rejected.

The alternatives analysis presented herein follows these requirements.

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<sup>1</sup> The First District (SF Bay Area) Court of Appeals reiterated in September of 2017, that the substantive requirements of CEQA to consider alternatives and analyze all impacts is required when a certified regulatory program issues an alternative environmental compliance document. *Pesticide Action Network North America v. California Department of Pesticide Regulation* (2017) 16 Cal.App.5th 224, 245.

## 4. METHODOLOGY

This document follows a seven-step process for developing, screening, and analyzing alternatives to the proposed Cypress Point project:

- Step 1: Define Project Objectives
- Step 2: Develop Screening Criteria
- Step 3: Identify Significant Impacts of Proposed Project
- Step 4: Develop a Range of Alternatives
- Step 5: Analyze Feasibility of Alternatives
- Step 6: Analyze Environmental Impacts of Feasible Alternatives
- Step 7: Identify Environmentally Superior Alternative

The methods used to complete each of these steps are described in the sections below.

### 4.1 STEP 1: DEFINE PROJECT OBJECTIVES

MidPen's objectives for the project are to:

1. Provide a significant number of low income affordable housing units in a vibrant, safe, well-designed community that respects the coastal character of the MidCoast region;
2. Provide affordable housing in the MidCoast region that is cost effective densities that are competitive for financing;
3. Address housing needs of households, families, and workers in the MidCoast region;
4. Provide housing for a diverse range of low income workers and families;
5. Improve the jobs/housing balance<sup>2</sup> and jobs/housing fit<sup>3</sup> in the MidCoast region by providing affordable dwelling units near MidCoast jobs;
6. Provide informal recreational opportunities for MidCoast residents and the general public by providing access to a trail on undeveloped portions of the site;
7. Be consistent with the character of the surrounding neighborhood by adhering to the existing development guidelines to the extent feasible.

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<sup>2</sup> The jobs/housing balance measures the extent to which a geographic area contains a relative balance between the number of houses available and the number of jobs; a balance between jobs and housing allows more people to live within the community and reduces the number of vehicle trips to/from outside the area.

<sup>3</sup> The jobs/housing fit measures the extent to which the distribution of housing prices match the income distribution of workers, and thus whether workers in an area can find housing they can afford near to their jobs.

## 4.2 STEP 2: DEVELOP SCREENING CRITERIA

The following criteria were used to develop and screen a reasonable range of feasible alternatives:

- **Meet Project Objectives** - Would the alternative allow MidPen to meet its basic project objectives? This criterion does not require that an alternative allow MidPen to meet all of its objectives, but it must allow it to “feasibly attain most of the basic objectives of the project.”
- **Technical Feasibility** - Could the alternative be constructed and operated using standard construction tools and materials, and within allowable San Mateo County zoning and building requirements?
- **Reduce or Eliminate Significant Environmental Effects** - Would the alternative reduce or eliminate any of the anticipated significant environmental impacts of the proposed project? Would the alternative result in new or more intense impacts on any resources compared to the proposed project?
- **Policy Compliance** - Does the alternative conflict with goals, policies, or actions contained in an adopted policy document, such as the Coastal Act, the San Mateo County Local Coastal Program, San Mateo County General Plan, or San Mateo County Zoning Code?
- **Ability to Implement** - Would the alternative be competitive for Low Income Housing Tax Credit (LIHTC) financing (the largest source of financing for affordable housing projects in California) and other sources of financing? Does MidPen possess, or can it obtain, the lands needed to construct the alternative?

## 4.3 STEP 3: IDENTIFY SIGNIFICANT ENVIRONMENTAL IMPACTS OF THE PROPOSED PROJECT

Pursuant to the CEQA Guidelines (15126.6(a)), each alternative must accomplish most of the basic project objectives, as listed above, and in some way avoid or substantially lessen one or more of the significant effects created by the proposed project. This section summarizes the significant environmental impacts of the proposed project (prior to mitigation).

The project site is zoned for residential development, and was previously developed with urban uses (military facilities and a fire fighter training facility). It does not now contain any agricultural or forestry resources, nor is the project site zoned for mineral extraction, or designated as containing mineral resources of state, regional, or local importance. Therefore, no impacts related to these resources would occur, and these resources are not evaluated further in this report.



The proposed project would result in the following significant impacts, prior to the implementation of mitigation measures:

### **Aesthetics**

- Creation of a new source of substantial light or glare.
- Potential conflict with applicable General Plan or Zoning Ordinance provisions within a Design Review District.

### **Air Quality**

- Construction activities, particularly during site preparation and grading, would temporarily generate fugitive dust in the form of PM<sub>10</sub> and PM<sub>2.5</sub>.
- Construction activities would lead to an increased community cancer risk because estimated cancer risk and PM<sub>2.5</sub> concentrations would be above the single-source thresholds of 10.0 per million for cancer risk, and a concentration of greater than 0.3 µg/m<sup>3</sup> for annual PM<sub>2.5</sub>.

### **Biological Resources**

- Disturbance of raptors potentially nesting in the forested areas in the northern portion of the site during project construction.

### **Cultural Resources**

- Destruction of potential midden site on the property.
- Potential disturbance of previously unidentified cultural resources during project construction activities.
- Potential disturbance of human remains during project construction activities.

### **Energy**

- None.

### **Environmental Justice**

- None.

### **Geology and Soils**

- Strong to very strong ground shaking could occur at the site during a large earthquake on one of the nearby faults.
- Coastal cliff/bluff instability or erosion.

### **Greenhouse Gas Emissions**

- None.

## **Hazards and Hazardous Materials**

- None.

## **Hydrology and Water Quality**

- Increased impervious surfaces and associated runoff.

## **Land Use and Planning**

- None.

## **Mineral Resources**

- None

## **Noise**

- Existing noise-sensitive land uses would be exposed to construction noise levels in excess of significance thresholds for a period of more than one year.

## **Population and Housing**

- None.

## **Public Services and Utilities**

- None.

## **Transportation and Circulation**

- Degrade operations on the critical movement at the intersection of SR 1/Carlos Street below the Level of Service (LOS) standard of LOS D.
- Increase delay for the critical movement at the SR 1/California Avenue/Wienke Way intersection.
- Increase delay for the critical movement at the SR 1/Vallemar Street/Etheldore Street intersection.
- Contribution to cumulative increase in delay for the critical movement at the SR 1/16<sup>th</sup> Street intersection.
- Contribution to cumulative impact at SR 1/Carlos Street intersection.
- Contribution to cumulative impact at SR 1/16<sup>th</sup> Street intersection.
- Contribution to cumulative impact at SR 1/California Avenue/Wienke Way intersection.
- Adding traffic to the SR 1/Carlos Street intersection, which operates without adequate site distance.
- An increase in unsafe pedestrians crossings of Highway 1 to access the nearest bus stop.
- Absence of sidewalks for safe travel by pedestrians on Carlos Street.

**Tribal Cultural Resources**

- None

**Wildfire**

- None.

**4.4 STEP 4: DEVELOP A RANGE OF ALTERNATIVES**

CEQA requires that a reasonable range of alternatives be evaluated in an EIR. The consideration of alternative sites for the project is required if this would result in significant impacts being avoided or lessened.

A broad list of potential alternatives, covering a range of approaches was developed. These alternatives are intended to avoid or minimize environmental impacts of the proposed project, while achieving most of the project objectives. In addition to the No Project Alternative (No Build), the alternatives include those intended to: reduce the density of the proposed development, reduce the number of units in the proposed project, and develop off-site alternatives. In addition, the analysis evaluates an alternative that would develop the site using the existing planned unit development (PUD) zoning (No Project – Previously Approved Project). Using these approaches, MidPen has developed the following alternatives to the proposed project.

It should be noted that two alternatives presented below can be considered as meeting the definition of a no project alternative, in that both could be implemented without changing the existing site zoning. The alternative titled No Project Alternative represents a future condition where the site would continue to be undeveloped. The PUD Alternative can also be considered a no project alternative, because it contemplates build-out consistent with the current PUD zoning<sup>4</sup>.

**4.4.1 NO PROJECT (NO BUILD) ALTERNATIVE**

The No Project (No Build) Alternative assumes that no development on the project site would occur. The site would remain in its present condition (see Figure 2). Based on historical trends and the lack of any other proposals for affordable housing in the MidCoast region, it is reasonably foreseeable that no additional income-restricted affordable housing beyond the proposed project would be constructed in the MidCoast region, except potentially for a school facility or other district-related use at the El Granada site (see under *Alternatives Considered but Rejected*, below).

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<sup>4</sup> The proposed project involves a change to the PUD zoning for the property. However, if the project is not approved, development consistent with the PUD zoning could occur in the foreseeable future. Because the impacts of the no-project alternative are analyzed “by projecting what would reasonably be expected to occur in the foreseeable future if the project were not approved,” the Existing PUD Zoning Alternative could be characterized as a no project alternative. CEQA Guidelines §15126.6(e)(3).

#### 4.4.2 MEDIUM DENSITY DEVELOPMENT ALTERNATIVE

Under the Medium Density Development Alternative (see Figure 5), the same number of housing units would be developed as under the proposed project, but rather than preserving part of the project site as open space, the entire site would be developed. The overall density of the project would be the same as the proposed project. However, instead of the residences being concentrated in one portion of the site, with the remainder of the site being left as open space, the proposed 71 units would cover the entire site, so the overall density of the developed area would be lower. The units would be developed as attached, single-family homes, with each structure containing a single home. The only open space that would remain in this alternative would be the landscaped areas within the development. The unit count, bedroom sizes, amenities (except for open space), and parking would be the same as under the proposed project.

#### 4.4.3 REDUCED NUMBER OF UNITS ALTERNATIVE

The Reduced Number of Units Alternative (see Figure 6) reflects the many comments received from the public during outreach regarding the proposed project conducted by MidPen in 2016 and 2017. Several commenters requested that the project be redesigned with fewer units. Under the Reduced Number of Units Alternative, the site would be developed with roughly half the number of units proposed for the Cypress Point project. This number represents a rough average of the number of units suggested by several of the commenters (ranging between 20 and 45 units). It also matches the number of low-income units under the existing zoning (see *Existing PUD Zoning Alternative* below), though it does not include the market rate units established under the existing zoning and land use designations of the project site.

The Reduced Number of Units Alternative would result in an overall density of 2.8 units per acre, and would include the following:

- 31 apartment units covering the same portion of the site as under the proposed project, including 7 one-bedroom, 16 two-bedroom, and 8 three-bedroom units, providing housing for approximately 93 total residents; all units would be designed for low-income renters, except for the manager's unit;
- 71 parking spaces;
- The same types of amenities and landscaping as under the proposed project.

The Reduced Number of Units Alternative would likely result in the development of a smaller proportion of the project site than the proposed project, because it would involve the construction of only half as many housing units. This alternative would result in more open space being maintained on the project site.

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Map Date: 06/29/2018

Drawing Not To Scale

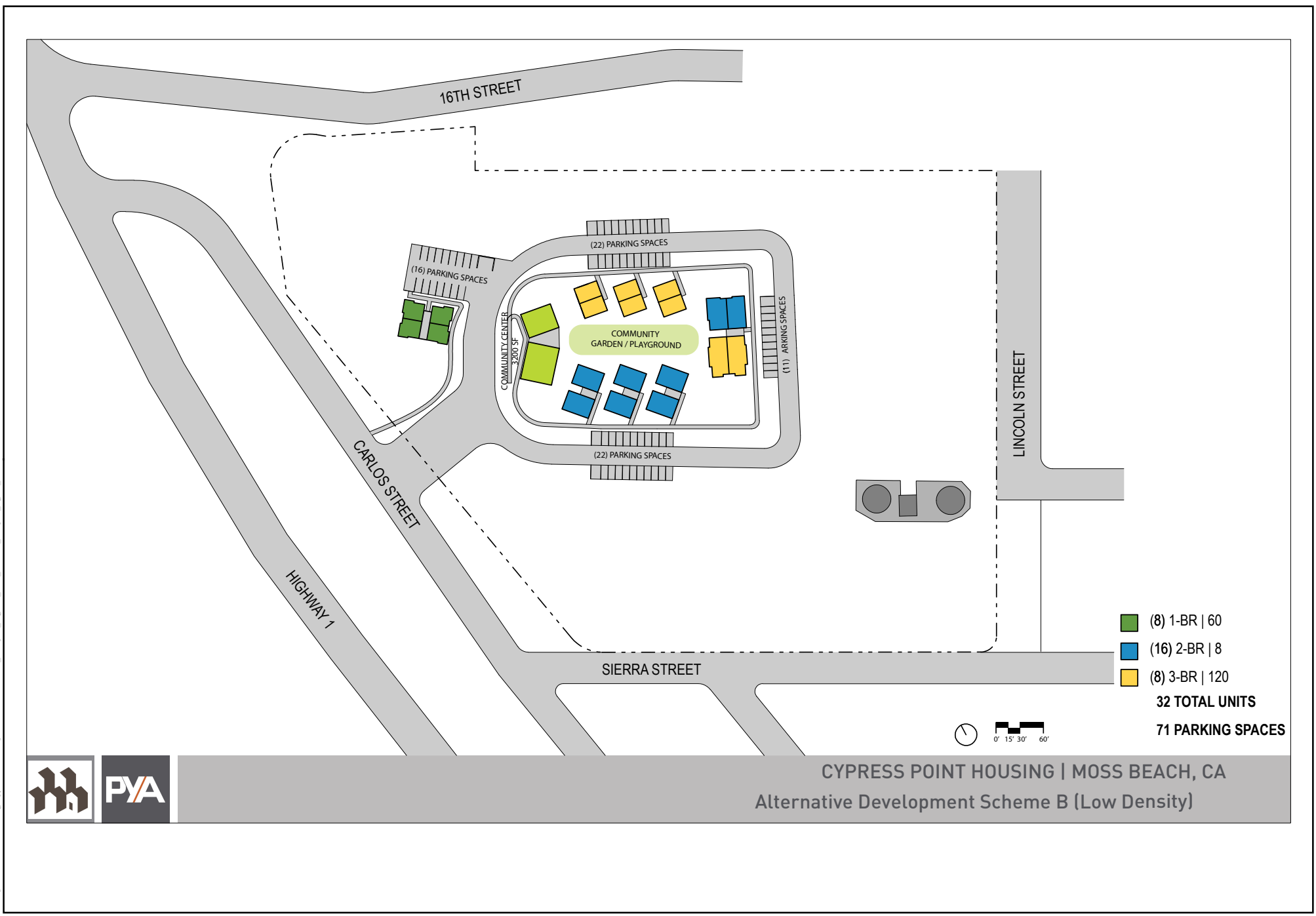


### Medium Density Development Alternative

San Mateo County, CA

Figure 5

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Map Date: 06/29/2018

Drawing Not To Scale



Figure 6  
**Reduced Number of Units Alternative**  
 San Mateo County, CA

#### 4.4.4 BUILDOUT PURSUANT TO EXISTING PUD ZONING (NO PROJECT) ALTERNATIVE

Under the Buildout Pursuant to Existing PUD Zoning Alternative (also considered a No Project Alternative), the project parcel would be developed as a mixture of market-rate and affordable condominium units, in accordance with the existing PUD zoning assigned to the parcel in the MidCoast LCP. Because the existing zoning for the parcel was developed and approved for the proposed Farallon Vista housing project, this alternative assumes that the parcel would be developed according to those entitlements, which remain in place and are the current zoning for the site. This alternative uses the description contained in the 1985 EIR prepared for the zoning of the site to PUD (San Mateo County Planning and Building Department 1985).

This alternative would result in the construction of 148 housing units on the parcel (see Figure 7), including 52 affordable units and 96 market rate units. Of the 52 affordable units, 31 would be designated as low income and 21 would be designated as moderate income. The market rate units would include 60 2-bedroom/2 ½ bath townhouses, and 36 2-bedroom/2 bath single-level units. The low and moderate-income units would all be 2-bedroom/1 bath single-level units. This development would house approximately 444 total residents.

Site amenities would include six tot lots, three barbecue areas, decks, gazebos, an exercise course/jogging trail, and some, but comparatively limited, open space areas compared to the proposed project. A total of 302 parking spaces would be provided, including 244 covered carports and 58 uncovered spaces.

Overall, the Existing PUD Zoning Alternative would be developed with a density of 13.4 units per acre. Approximately 46 percent of the parcel would be developed, and 54 percent would remain as private open space.

#### 4.4.5 OFF-SITE ALTERNATIVE - SOUTH MOSS BEACH SITE

The South Moss Beach site is a 12.5-acre parcel located at 1181 Etheldore Street in south Moss Beach (APN 037-320-270) (see Figure 8). This site is designated for affordable housing in the San Mateo County MidCoast LCP. This property is owned by a private individual.

Approximately half of the site has a zoning overlay associated with the Half Moon Bay Airport zoning district, which limits development to 1 unit per 2 acres. If the half of the site outside of the airport zoning district could be developed at the same density as the proposed project, 71 units could be constructed on this property.

#### 4.4.6 OFF-SITE ALTERNATIVE – EL GRANADA SITE

A second offsite location is a 6-acre parcel located in the community of El Granada, southeast of the proposed project site (APN 047-054-100) (see Figure 8). It is designated for affordable housing in the San Mateo County MidCoast LCP. The parcel is owned by the Cabrillo Unified School District. If the entire property were developed at the same density as the proposed project, 71 units could be constructed on this property.

APPLICANT: Farallon Vista Association  
LOCATION: Montara  
SAN MATEO COUNTY PLANNING COMMISSION MEETING OF - Sept. 25, 1985

REQUEST: CDP 85-22; SMJ 85-1; UP 85-14; ZR 85-1  
PRESENT ZONE: R-1/S-17/DR & R-3-A/S-5

35

**PROJECT SUMMARY**

A1 UNITS	24
A2 UNITS	26
B UNITS	28
C UNITS	32
TOTAL UNITS	148
COVERED PARKING	240
OPEN PARKING	39
TOTAL PARKING	309

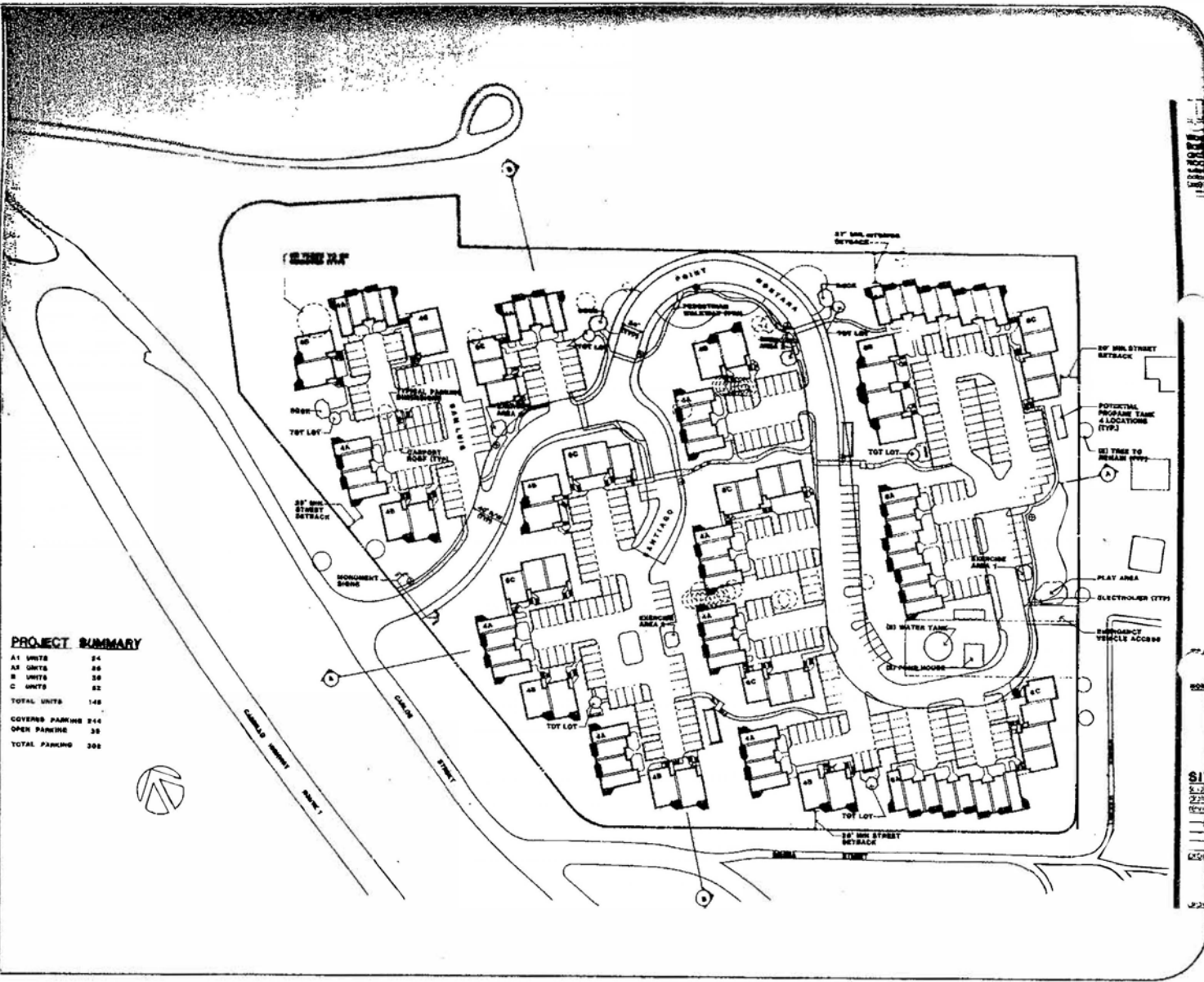
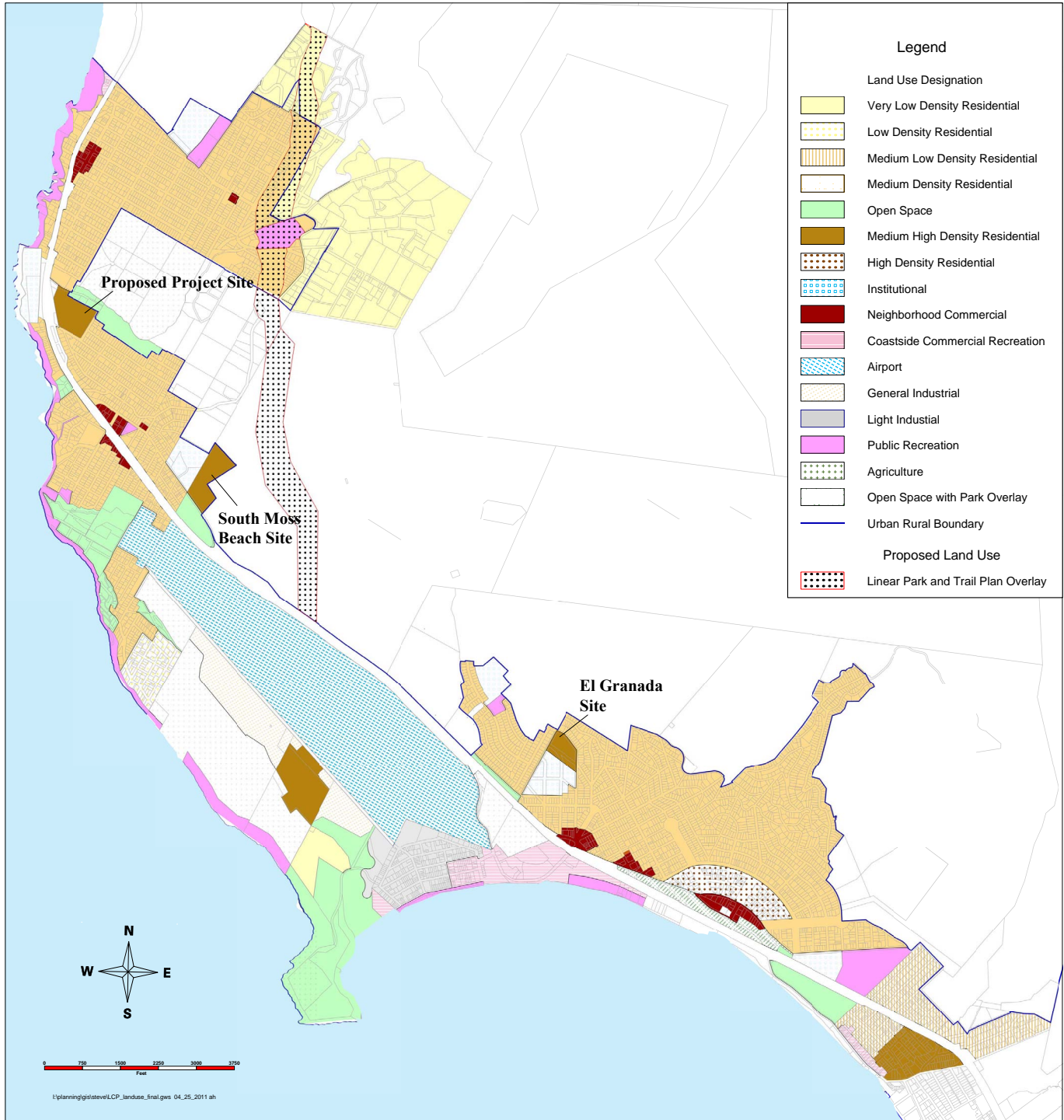


Figure 7



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Base Map Source: ESRI, 2017  
Map Date: 06/29/2018



Figure 8  
Location of Offsite Alternatives

San Mateo County, CA

## 4.5 STEP 5: ANALYZE FEASIBILITY OF ALTERNATIVES

The feasibility of each alternative is analyzed, and the environmental impacts of each feasible alternative are evaluated.

### 4.5.1 NO PROJECT ALTERNATIVE

The No Build Alternative would not result in the construction of any new affordable housing units in the MidCoast region. Therefore, it would not meet any of the project objectives. However, analysis of the No Project Alternative is required under CEQA, so this alternative will be analyzed under Step 6.

### 4.5.2 MEDIUM DENSITY DEVELOPMENT

**Meeting Project Objectives:** The Medium Density Development Alternative would meet nearly all of the project objectives, because it would include the same number and mix of housing units as the proposed project. However, it would not meet Objective #6 related to providing recreational opportunities by preserving open space, because the development would cover the entire site.

**Technical Feasibility:** This alternative is generally technical feasible, although there are likely challenges with developing the steep northern section of the site, which would add significant costs to project development and perhaps add challenges in achieving compliance with the Americans with Disabilities Act.

**Policy Compliance:** This alternative is generally consistent with the Coastal Act and LCP policies, although development of the steeply sloped northern portion of the site may violate LCP Policy 9.18. That policy prohibits development on slopes of greater than 30 percent unless no alternative exists, or the alternative involves development on a skyline or ridgeline.

**Ability to Implement:** MidPen would have the same ability to purchase the site as the proposed project. However, the overall project would be significantly more costly since it would require additional construction, utility, and grading work, which would create challenges for financing.

**Conclusion:** The Medium Density Alternative is less technically feasible than the proposed project. Nevertheless, because the Medium Density Alternative would meet most of the project objectives, it will be analyzed further under Step 6.

### 4.5.3 REDUCED NUMBER OF UNITS ALTERNATIVE

**Meeting Project Objectives:** The Reduced Number of Units Alternative would achieve some, though not all of the project objectives, and would meet some objectives only partially. For example, it would result in creating only 31 units of affordable housing, which would only partially meet Objective #1. Also, with regard to Objective #2, it is unclear whether a 31-unit development would achieve cost efficiencies that would allow it to be competitive for financing.

**Technical Feasibility:** There are no known technical hurdles associated with this alternative, as the reduced number of units would make avoidance of the steeper portions of the site easier.

**Policy Compliance:** This alternative would be consistent with state and local policies to roughly the same extent as the proposed project. Because the density of development under this alternative would be less than the current LCP zoning and the General Plan designations, implementation of this alternative would require amendment of both Plans.

**Ability to Implement:** As mentioned above, because this alternative would involve fewer housing units compared to the proposed project, it would be less competitive for financing compared to the proposed project. Moreover, while less funding would be available for the project due to the smaller number of units, many costs such as the land purchase, infrastructure requirements (e.g., sewerage, electric power), and engineering fees would be similar, thereby increasing the per unit cost. Therefore, the per-unit cost of development would be significantly higher compared to the proposed project. However, in terms of ability to use the property, because the Reduced Number of Units Alternative would be located on the same property as the proposed project, MidPen would have the same ability to purchase the site as the proposed project.

**Conclusion:** The Reduced Number of Units Alternative is less feasible than the proposed project because it would be less competitive in obtaining tax credits and increased per unit costs. Moreover, the Reduced Number of Units Alternative would only be partially successful in achieving Objectives #1 and #2, #3, and #4. Nevertheless, because the Reduced Number of Units Alternative would, at least partially, meet other project objectives, and is responsive to requests made by several members of the public, it will be analyzed further under Step 6.

#### 4.5.4 EXISTING PUD ZONING ALTERNATIVE

**Meeting Project Objectives:** The Existing PUD Zoning Alternative, would meet some, though not all of the project objectives, and would meet some objectives only partially. For instance, it would result in creating only 31 units of affordable housing, which is fewer than the number under the proposed project. Therefore, it would only partially meet Objective #1. Also, with regard to Objective #2, the development would also be less competitive for tax credit financing, since only the 31 of the units would be eligible for assistance through this program; however, because the alternative would include more units than the proposed project it would achieve significant cost efficiencies by spreading fixed costs (e.g., utilities, land acquisition, engineering costs) over a larger number of units. Additionally because the project would receive higher incomes from moderate and market-rate units, it would have broader opportunities for traditional real estate financing. This alternative would cover most of the project parcel with development, and would thus not preserve significant contiguous areas for public open space. Therefore, it would not meet Objective #6. Finally, this alternative would have a much greater density of development than the surrounding neighborhood, and would thus not meet Objective #7.

**Technical Feasibility:** This alternative would likely require development on the steeper portions of the site, which could be technically challenging to achieve, add considerable expense to the project, and perhaps add challenges in achieving Americans with Disabilities Act compliance.

**Policy Compliance:** This alternative is generally consistent with the Coastal Act and LCP policies, with two exceptions. Development of the steeply sloped northern portion of the site may violate LCP Policy 9.18, which prohibits development on slopes of greater than 30 percent unless no alternative exists or the alternative involves development on a skyline or ridgeline. Also, while the LCP includes policies that reserve water and wastewater treatment capacity for affordable housing, this alternative would also include 96 market-rate housing units, and the availability of water for those units is not reserved. Information is not available at this time as to whether sufficient water and sewer capacity is available for this alternative.

**Ability to Implement:** There could be some challenges to financing the Existing PUD Zoning Alternative because only the 31 low-income units would be eligible for tax credit financing. However, the per unit cost of development would be significantly lower than the proposed project, and the revenue from the market-rate units would contribute to alternative's overall financial feasibility. This alternative is on the same parcel as the proposed project, so MidPen would have the same access to this land as for the proposed project.

**Conclusion:** The Existing PUD Zoning Alternative is less feasible than the proposed project because it would be less competitive for tax credits and associated financing challenges, and is less technically feasible than the project based on the need to develop on steep slopes. Nevertheless, because the Reduced Number of Units Alternative would meet most of the project objectives, it will be analyzed further under Step 6.

#### 4.5.5 OFF-SITE ALTERNATIVE - SOUTH MOSS BEACH SITE

**Meeting Project Objectives:** For the South Moss Beach site, approximately half of the site has a zoning overlay associated with the Half Moon Bay Airport zoning district, which limits development to 1 unit per 2 acres. Thus, on half of the site, only 3 units could be constructed, so this portion of the site could remain as open space. If the other half of the site were developed at 12 units per acre, roughly 71 units could be developed on the site, similar to the proposed project.

**Technical Feasibility:** It is not known whether any aspects of the site would make the construction of the proposed project infeasible. However, there is a significant slope on the portion of the site that is not covered by the airport district and this could create technical hurdles to developing the site, similar to the Medium Density and Existing PUD Zoning alternatives, discussed above.

**Legal and Regulatory Feasibility:** As indicated above, approximately half of this site is within the Half Moon Bay Airport zoning district. Further, in 2004, a project was proposed for this site that would have included 73 affordable senior apartments, a resident manager's unit, and 55

market-rate single-family homes. The California Coastal Commission denied this proposal based on a number of factors, including the following environmental concerns:

- Development within 100 feet of a wetland; and
- Development adjacent to an environmentally sensitive habitat, which would significantly degrade the habitat and reduce its biological productivity.

**Policy Compliance:** In addition to the biological constraints listed above, the Coastal Commission found that the previous proposal would conflict with:

- LUP Policy 7.3 because it would involve development adjacent to an Environmentally Sensitive Habitat Area.
- LUP Policies 7.18 and 7.19 which prohibits development within 100 feet of wetlands;
- LUP Policy 8.7 involving development on a ridgeline or hilltop;
- LUP Policy 8.13 because of the need for extensive grading; and
- LUP Policy 9.18 which prohibits development on slopes greater than 30 percent.

Based on information contained in the National Wetlands Inventory (USFWS 2018), the project site is adjacent to and drains to San Vicente Creek. Even if this alternative were designed to concentrate most development on the upper half of the site, outside of the airport zoning district, it would involve many of the same policy conflicts as the 2004 proposal, including: Policy 8.7, 8.13, and 9.18, and possibly 7.3, 7.18, and 7.19.

**Ability to Implement:** Although a detailed analysis has not been conducted, the significant grading challenges and presence of a wetland on or adjacent to the portion of the site not affected by the overlay district would likely present insurmountable implementation challenges. In addition, MidPen does not own the South Half Moon Bay site, and does not have any current opportunity to obtain site control. They attempted to contact the property owner on three occasions, without success<sup>5</sup> (Ip pers. comm.). Thus, there is considerable uncertainty as to MidPen's ability to implement this project.

**Conclusion:** A number of factors make this alternative infeasible, including the restrictions on density on half the site due to the presence of an airport overlay; the presence of wetlands on or adjacent to the project site which would restrict development of another portion of the site; conflicts with a number of LUP policies, including those related to the steepness of the slope of the parcel; and lack of control of the property by the project proponent. For these reasons, this alternative will therefore not be analyzed further under Step 6.

#### 4.5.6 OFF-SITE ALTERNATIVE – EL GRANADA SITE

The other offsite location is a 6-acre parcel located in North El Granada. The parcel is owned by the Cabrillo Unified School District.

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<sup>5</sup> Phone messages left for property owner in Texas on January 23, January 31, and February 13, 2018 by Serena Ip, MidPen Housing. As of the date of publication, no response has been received.

**Meeting Project Objectives:** For the El Granada site, the entire property is only six acres, so the entire property would need to be developed in order to meet the proposed project's expected 71 units of affordable housing. Because the entire site would need to be developed, this alternative would not meet Objective #6.

**Technical Feasibility:** Based on a visit to the project site on February 21, 2018, the site is quite steep, particularly at the northern end, which could present grading-related obstacles to its development.

**Environmental Effects:** The site has not been evaluated, so it is not known whether the site contains any biological constraints, but the site is currently covered with hundreds, if not thousands of mature trees, many, if not most of which, would need to be removed. Many of the trees are non-native species such as eucalyptus, but it is not known if any native or protected species occupy the site.

**Policy Compliance:** It is not known whether any physical, biological, or other aspects of the site would present a conflict with policies contained in Chapter 3 of the Coastal Act or the San Mateo MidCoast LCP, though it appears that the steep slopes could result in conflicts with Policies 8.7, 8.13, and 9.18.

**Ability to Implement:** MidPen staff discussed with the Superintendent for the Cabrillo Unified School District whether the site would be available for development during a phone call on September 19<sup>th</sup> 2017 (Yuster pers. comm.). The Superintendent indicated that the District is reserving this property for a potential school facility or other district-related uses. They are not interested in selling this property. Therefore, MidPen does not have the ability to develop this site.

**Conclusion:** Because the El Granada site is not available to MidPen, it is not a feasible alternative, and will not be evaluated further under Step 6.

#### 4.5.7 ALTERNATIVES CONSIDERED BUT REJECTED

Based on the analysis described above, the two off-site alternatives were rejected as infeasible. The South Moss Beach Site Alternative was found to be infeasible because of the presence of Environmentally Sensitive Habitat Areas, lack of control of the property by the project proponent, and policy compliance conflicts with the Local Coastal Program. The El Granada Alternative was found to be infeasible because the site is not available to MidPen for development.

### 4.6 STEP 6: ASSESS ENVIRONMENTAL IMPACTS OF FEASIBLE ALTERNATIVES

This section evaluates the environmental impacts of each of the feasible alternatives, compared to the impacts of the proposed project. It begins with a summary comparison of the alternatives, followed by a more detailed comparison of the impacts of the alternatives, compared to the proposed project.

#### 4.6.1 SUMMARY COMPARISON OF ALTERNATIVES

Table 1 summarizes the impacts of the proposed project for each of the topic areas contained in Appendix G of the CEQA Guidelines as amended by San Mateo County, and summarizes the impacts of each of the four feasible alternatives compared to the proposed project. The information in Table 1 is based partially on the following documents:

- Cypress Point Project Visual Resources Report (Stevens Consulting 2018a);
- Cypress Point Affordable Housing Project - Air Quality and Greenhouse gas Emissions Assessment (Illingworth & Rodkin 2018a);
- Biological Resources Assessment for the MidPen Cypress Point Housing Project (De Novo Planning Group 2018);
- Cypress Point Project Cultural Resources Report (Stevens Consulting 2018b);
- Cypress Point Environmental Justice Report (Stevens Consulting 2018c);
- Geotechnical Investigation-Proposed Affordable Housing Development 16<sup>th</sup> Street and Carlos Streets, Moss Beach, California (Rockridge Geotechnical 2017);
- Phase I Environmental Site Assessment – Carlos Street at Sierra Street (AEI Consultants 2015);
- Limited Phase II Subsurface Investigation – Carlos Street at Sierra Street (AEI Consultants 2016);
- Additional Subsurface investigation and Water Well Evaluation - Carlos Street at Sierra Street (AEI Consultants 2018a);
- Groundwater Sampling and Well Destruction Report – Project Number 3502428 – Cypress Point Development (AEI Consultants 2018b);
- Cypress Point Hydromodification Management Report – Revision 1 (BKF 2018);
- Cypress Point Affordable Housing Project Noise and Vibration Assessment (Illingworth and Rodkin 2018);
- Cypress Point Project Public Services and Utilities Report (Stevens Consulting 2018d);
- Preliminary Environmental Evaluation Report (Stevens Consulting 2018e)

<b>Table 1 Summary Comparison of the Impact of Feasible Alternatives*</b>				
<b>Resource</b>	<b>Significant Impacts of Proposed Project (prior to mitigation)</b>	<b>Medium Density Development Alternative</b>	<b>Reduced Number of Units Alternative</b>	<b>Existing PUD Zoning Alternative</b>
Aesthetics and Visual Resources	Creation of new light and glare sources; potential conflict with Design Review policies.	Potential impacts would be greater than for the proposed project. Impact conclusions and mitigation requirements would be the same.	Potential impacts would be less than for the proposed project. Impact conclusions and mitigation requirements would be the same.	Potential impacts would be greater than for the proposed project. Additional visual resource impacts could occur. For identified impacts, conclusions and mitigation requirements could be modified.
Air Quality	Impact related to project construction.	Emissions would be the same as proposed project. Impact conclusions and mitigation requirements would be the same.	Emissions would be less than proposed project. Impact conclusions and mitigation requirements would be the same.	Emissions would be greater than proposed project. Impact conclusions and mitigation requirements would be the same.
Biological Resources	Potential disturbance of nesting raptors due to project construction.	Same as proposed project, but additional potential impacts to nesting raptors due to removal of trees.	Same as proposed project.	Same as proposed project, but additional potential impacts to nesting raptors due to the removal of trees.
Cultural Resources	Impact to identified midden site; potential disturbance of previously unidentified subsurface cultural resources, and human remains.	Same as proposed project.	Same as proposed project.	Same as proposed project.
Energy	None.	Energy use would be greater than under the proposed project. Impact conclusions would be the same.	Energy use would be less than under the proposed project. Impact conclusions would be the same.	Energy use would be greater than under the proposed project. Impact conclusions would be the same.
Environmental Justice	None.	None.	None.	None.



<b>Table 1 Summary Comparison of the Impact of Feasible Alternatives*</b>				
<b>Resource</b>	<b>Significant Impacts of Proposed Project (prior to mitigation)</b>	<b>Medium Density Development Alternative</b>	<b>Reduced Number of Units Alternative</b>	<b>Existing PUD Zoning Alternative</b>
Geology and Soils	Exposure to seismic activity, unknown subsurface conditions, and water erosion hazards.	Same as proposed project, but with additional risks associated with development of steep slopes and increased areas exposed to erosion.	Same as proposed project.	Same as proposed project, but with additional risks associated with development of steep slopes and increased areas exposed to erosion.
Greenhouse Gas Emissions	GHG emissions below BAAQMD screening criteria. Project is consistent with Plan Bay Area 2040.	Same as proposed project.	Emissions would be less than proposed project. Consist with Plan Bay Area, but to a lesser extent.	GHG emissions greater than proposed project. Exceed BAAQMD screening criteria, so detailed GHG emissions estimate required. Would provide some affordable housing, so would be consistent with Plan Bay Area 2040.
Hazards and Hazardous Materials	None.	None.	None.	None.
Hydrology and Water Quality	Mitigation required for impact related to increase in stormwater runoff.	Greater impact than proposed project because more land would be converted to impermeable surface.	Slightly less impact than proposed project because less land would be converted to impermeable surface.	Greater impact than proposed project because more land would be converted to impermeable surface.
Land Use	None.	None.	None.	None.
Mineral Resources	None.	None.	None.	None.
Noise and Vibration	Mitigation required for impacts related to construction noise.	Construction noise greater than proposed project due to additional area of site grading; same contribution to traffic noise; possibly significant impact related to vibration, if structures constructed closer to neighboring houses.	Construction noise similar to proposed project; less contribution to traffic noise; possibly significant impact related to vibration, if structures constructed closer to neighboring houses.	Construction noise greater than proposed project due to additional area of site grading; greater contribution to traffic noise; possibly significant impact related to vibration, if structures constructed closer to neighboring houses.

<b>Table 1 Summary Comparison of the Impact of Feasible Alternatives*</b>				
<b>Resource</b>	<b>Significant Impacts of Proposed Project (prior to mitigation)</b>	<b>Medium Density Development Alternative</b>	<b>Reduced Number of Units Alternative</b>	<b>Existing PUD Zoning Alternative</b>
Population and Housing	None.	None.	None.	None.
Public Services, Utilities, and Service Systems	No impacts.	Same as proposed project.	Same as proposed project.	Impacts on services and utilities would be more intense than proposed project; no guarantee of adequate water supply or wastewater treatment capacity.
Recreation	None.	None.	None.	None.
Transportation and Circulation	Impacts to three intersections, to pedestrians, and to transit. Mitigation proposed where feasible.	Same as proposed project.	Same as proposed project, but trip generation would be less.	Same as proposed project, but trip generation would be more.
Tribal Cultural Resources	None.	None.	None.	None.
Wildfire	None.	None.	None.	None.

\* By definition, the No Project Alternative would not have any environmental impacts, so only the Build alternatives are evaluated.

## 4.6.2 DETAILED COMPARISON OF ALTERNATIVES

### Aesthetics and Visual Resources

The **proposed project** would result in the creation of new sources of light and glare on the project site that could affect nearby residents. Because the proposed Cypress Point project has not yet undergone design review pursuant to San Mateo County requirements, there is the possibility that the project as now designed may not meet with all design requirements set forth in the San Mateo County General Plan, Local Coastal Plan, and County Code. Mitigation for both of these potential effects has been identified to reduce these impacts to less than significant.

Under the **No Project (No Build) Alternative**, the project site would not be developed and thus would not create any light or glare, or result in a possible inconsistency with Design Review policies.

For the **Medium Density Development Alternative**, the impact findings related to aesthetics and visual quality would be would be greater than the proposed project since more of the site would be graded, and perimeter and onsite vegetation losses would be greater than the proposed project. The visual impact of the project would be greater, and additional impacts related to scenic character and views from existing residential areas would occur.

For the **Reduced Number of Units Alternative**, potential aesthetic effects would be less than those for the proposed project. Implementation of this alternative would result in reductions in the in the area graded and vegetation lost compared to the proposed project. Fewer buildings would be constructed, and the structures could be clustered near the center of the site, leading to greater setbacks between the project and adjacent residences.

The **Existing PUD Zoning Alternative**, the impact findings related to aesthetics and visual quality would be would be greater than the proposed project since more of the site would be graded, and perimeter and onsite vegetation losses would be greater than the proposed project. The visual impact of the project would be greater, and additional impacts related to scenic character and views from existing residential areas would occur.

### Air Quality

The **proposed project** is below the Bay Area Air Quality Management District (BAAQMD) screening sizes for impacts related to emissions of criteria air pollutants for both construction (240 dwelling units) and operations (451 dwelling units). Impacts related to construction and operational criteria pollutants, and operational community risk would all be less than significant. It would only have significant air quality impacts related to the emissions of TACs/particulate matter during project construction that lead to significant increases in cancer risk and annual PM2.5 concentrations. Mitigation is identified to reduce this impact to less than significant.

For the **Medium Density Alternative**, the impact findings related to construction and operational criteria pollutant emissions, operational community risk, and construction community risk would be the same as under the proposed project. Air quality impacts related to the emissions of TACs/particulate matter during project construction would be significant and the same mitigation as identified for the proposed project would apply to this alternative. This alternative would be below the BAAQMD screening sizes for the emissions of criteria air pollutants for both construction and operations for single-family homes.

The **Reduced Density Alternative** would involve a smaller number of units than the proposed project, so construction and operations emissions associated with this alternative would be lower than the proposed project. So, the impact findings related to construction and operational criteria pollutants, operational community risk and construction community risk would be the same as under the proposed project. Air quality impacts related to the emissions of TACs/particulate matter during project construction would also lead to significant community risks and the same mitigation as identified for the proposed project would be appropriate for this alternative. Like the proposed project, this alternative would be below the BAAQMD screening sizes for the emission of criteria air pollutants for both construction and operations for low-rise apartments.

The **Existing PUD Zoning Alternative** would involve a higher number of units than the proposed project, so construction and operation emissions associated with this alternative would be higher than the proposed project. However, the impact findings related to construction and operational criteria pollutant emissions, operational community risk and construction community would be the same as under the proposed project. This Alternative project would be below the BAAQMD screening sizes for construction and operational criteria pollutant emissions. The operational community risk impact to project receptors would remain the same, since the analysis of the project conservatively evaluated the impact of TAC sources as occurring at the nearest point on the project site. The construction community risk assessment modeled the entire project site as a potential construction area, so impacts related to construction community risk would be similar to the proposed project. While construction community risk values could be slightly higher due to a higher unit count, recommended mitigation measures would reduce the impact to less than significant.

## **Biological Resources**

While the **proposed project** would not result in the loss of any protected species, its construction has the potential of impacting raptor species nesting in the forested northern portion of the site.

The **No Project (No Build) Alternative** would not result in further development of the project site, so it would not have impacts on biological resources.

The **Medium Density Development Alternative** would result in the development of the entire project site, so potential impacts on nesting raptors would be greater than the proposed project, because it would result in the loss of the potential nesting trees. Additional mitigation would be required to reduce this impact to less than significant.

The **Reduced Number of Units Alternative** would result in the development of a smaller portion of the project site, compared to the proposed project, and like the proposed project, the northern forested portion of the site would not be developed. Thus, the potential impacts on nesting raptors due to project construction would be similar to the impacts of the proposed project, and the same mitigation would be required to reduce the impact to less than significant.

The **Existing PUD Zoning Alternative** would result in the development of the entire project site, so the potential impacts of constructing this alternative on nesting raptors would be greater than the proposed project, but the same as the Medium Density Development Alternative. Additional mitigation would be required to reduce this impact to less than significant.

### Cultural Resources

The **Proposed Project** would result in the loss of a potentially significant midden site (site CA-SMA-341) that was identified on the project property. It is likely a Native American site, but it has been disturbed and contains 20<sup>th</sup> century artifacts as well. It is not known whether the midden soils were moved to the site during previous uses of the site or is native to that location. The site may include intact features. The project property is conservatively considered sensitive for the discovery of unknown buried cultural resources or buried human remains, and mitigation is proposed to address these potential impacts.

The **No Project (No Build) Alternative** would not result in any ground disturbance on the project site, so it would not have any potential impacts on undiscovered subsurface cultural resources or human remains.

The **Medium Density Development Alternative** would result in the development of the entire project site, so it would have a somewhat greater likelihood of impacting undiscovered subsurface cultural resources and human remains than the proposed project.

The **Reduced Number of Units Alternative** would result in the development of a somewhat smaller portion of the project site than the Proposed Project, so it would be more likely to be able to avoid CA-SMA-341, and have a somewhat smaller likelihood of impacting undiscovered subsurface cultural resources and human remains than the proposed project.

The **Existing PUD Zoning Alternative** would result in the development of the entire project site, so it would definitely impact CA-SMA-341 and have a greater likelihood of impacting undiscovered subsurface cultural resources and human remains than the proposed project.

## Energy

The **Proposed Project** would result in a less-than-significant impact related to the wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation. The proposed project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. The environmental commitments agreed upon by the Applicant as part of the project would result in energy efficiency beyond State requirements.

Under the **No Project (No Build) Alternative**, no development would occur on the project site, so no energy use would occur. It should be noted that transportation energy consumption could be higher without the project because of the transportation energy use associated with coastal workers commuting from more distant locations.

The **Medium Density Alternative** would result in greater energy use compared to the proposed project because single-family homes generate a greater number of vehicle trips and consume more energy. This alternative with the environmental commitments agreed upon by the Applicant as part of the project would result in energy efficiency beyond State requirements. Impact conclusions would be the same as the proposed project.

The **Reduced Number of Units Alternative** would result in less energy use compared to the proposed project because the alternative would include fewer units, but energy consumption per dwelling unit would be the same. This alternative with the environmental commitments agreed upon by the Applicant as part of the project would result in energy efficiency beyond State requirements. Impact conclusions would be the same as the proposed project.

The **Existing PUD Zoning Alternative** would result in greater energy use compared to the proposed project because the alternative would include more units, but on an energy consumption per dwelling unit basis, energy consumption would be the same. This alternative with the environmental commitments agreed upon by the Applicant as part of the project would result in energy efficiency beyond State requirements. Impact conclusions would be the same as the proposed project.

## Environmental Justice

The **Proposed Project** would not result in any impacts related to Environmental Justice, as no environmental justice communities were identified in the vicinity of the proposed project, and the project itself would not create any impacts related to environmental justice.

The **No Project Alternative** would not result in any changes to the project site, so would also not result in any impacts related to environmental justice.

Similar to the Proposed Project, the **Medium Density Development Alternative** would not have any impacts related to environmental justice, as it would be developed at the same location and have similar environmental impacts to the proposed project.

Similar to the Proposed Project, the **Reduced Number of Units Alternative** would not have any impacts related to environmental justice, as it would be developed at the same location and would have similar environmental impacts to the proposed project.

Similar to the Proposed Project, the **Existing PUD Zoning Alternative**, would not have any impacts related to environmental justice, as it would be developed at the same location and would have similar environmental impacts to the proposed project.

## Geology and Soils

A geotechnical analysis (Rockridge 2017) found that the project can be developed as planned. However, it noted some specific impacts and provided recommendation to ensure that any impacts are properly mitigated.

Like all development in the mid-coast region, the **proposed project** would be subject to:

- Strong to very strong ground shaking could occur at the site during a large earthquake on one of the nearby faults;
- The presence of undocumented fill and unknown buried foundations and utility lines from the previous site development;
- The likely presence of large tree roots beneath some of the proposed improvements; and
- Significant water erosion hazards.

With adoption of the recommendations in the geotechnical report, this impact would be less than significant.

The **No Project (No Build) Alternative** would not involve the development of the project site, so it would not subject any structures to soil-related or geologic hazards.

The **Medium Density Development Alternative** would involve development of the entire property, including the steeply sloped portion on the northern edge of the project site. This alternative would have impacts similar to the proposed project related to exposure to: earthquake hazards; the presence of undocumented fill and unknown buried foundations and utility lines from previous site development; and the likely presence of large tree roots beneath some of the proposed improvements. Because the whole of the site would be graded, the area subject to severe water erosion during construction would increase. In addition, the Medium Density Development Alternative would be subject to risks associated with construction on steep slopes and unknown soil conditions within the northern portion of the project site, which the proposed project would not be subject to.

The **Reduced Number of Units Alternative** would involve construction on a smaller proportion of the project site than the proposed project. It would be subject to the same soil and geology-related hazards as the proposed project, but erosion and soils-related risks may be better avoided because MidPen could choose to locate structures on portions of the property where these hazards are not as severe or don't exist.

The **Existing PUD Zoning Alternative**, like the Medium Density Development Alternative would involve development of the entire parcel with urban uses. Thus, like the Medium Density Development Alternative, because the whole of the site would be graded, the area subject to

severe water erosion during construction would increase. This alternative also would be subject to risks associated with construction on steep slopes and unknown soil conditions within the northern portion of the project site, to which the proposed project would not be exposed.

## Greenhouse Gas Emissions

The **proposed project** is below the screening size for GHG emissions (78 units). Therefore, a quantified assessment of GHG impacts did not need to be conducted. The proposed project was found to be consistent with the Plan Bay Area, because it would support the goals, objectives and actions contained in the plan to increase the availability of affordable housing in the Bay Area.

Under the **No Project (No Build) Alternative**, no development would occur on the project site, so no emissions of GHG would occur.

The **Medium Density Alternative** would be above the screening size of 56 single-family dwelling units and therefore, a quantified assessment of GHG impacts would need to be conducted. This alternative would also be consistent with Plan Bay Area 2040, for the same reasons as the proposed project.

Like the proposed project, the **Reduced Number of Units Alternative** would be below the BAAQMD screening size of 78 low-rise apartments, so a quantified assessment of GHG impacts did not need to be conducted. This alternative would be consistent with the Plan Bay Area 2040, for the same reasons as the proposed project, though it would provide fewer affordable housing units.

The **Existing PUD Zoning Alternative** would exceed the screening size and thus, a quantified analysis of GHG emissions would be needed. This alternative would be consistent with Plan Bay Area 2040, because it would include affordable housing units, though approximately half as many as the proposed project.

## Hazards and Hazardous Materials

The analysis of the existence of hazards and hazardous materials on the project site identified only two potential hazards, the presence of lead in soil in limited areas and the existence of an improperly abandoned well. As a result of these activities, the project applicant has adopted the best management practices and measures identified in a March 2016 Site Management Plan. The well has since been properly destroyed, and thus no longer represents a hazard.

Thus, none of the four alternatives to the proposed project would be exposed to hazards or hazardous materials present on or near to the project site, so all alternatives would have the same impacts as the proposed project.



### Hydrology and Water Quality

The **proposed project** would result in two impacts related to hydrology and water quality. Because the proposed project would result in the conversion of a portion of the site from pervious to impervious surfaces, it would result in:

- An increase in runoff from the project site during storm events, and
- An increase in pollutants in this runoff due to the construction of urban uses on the site.

The establishment of bioretention basins are planned for the project to reduce this impact to less than significant.

The **No Project (No Build) Alternative** would not involve any development on the project site, and thus would not result in any changes in runoff or pollutant loads compared to existing conditions.

The **Medium Density Development Alternative** would involve a larger proportion of the site being converted from pervious to impervious surfaces, and thus would result in a greater increase in runoff from the project site during storm events, and a larger increase in pollutant concentrations in this runoff compared to the proposed project. Before mitigation, this alternative would have greater impacts than the proposed project, but with the establishment of bioretention basins with greater capacity than under the proposed project the net impact would be the same.

The **Reduced Number of Units Alternative** would involve a smaller proportion of the site being converted from pervious to impervious surfaces, and thus would result in a smaller increase in runoff from the project site during storm events, and a smaller increase in pollutant concentrations in this runoff compared to the proposed project. Before mitigation, this alternative would have lesser impacts than the proposed project, but with the establishment of bioretention basins with smaller capacity than under the proposed project the net impact would be the same.

The **Existing PUD Zoning Alternative** would involve development of the entire site, as under the Medium Density Development Alternative, and would thus have impacts on runoff and pollutant loading similar to that alternative. The establishment of bioretention basins with greater capacity than under the proposed project would be required.

### Land Use and Planning

The analysis of land use and planning on the project site did not identify any significant impacts related to land use. Implementation of the project would not result in the physical division of an existing community, nor would it result in conflicts with the General Plan, LCP, and zoning land use designations assigned to the project site, once the requested changes to these designations has been approved. The project as proposed would not result in a conflict with an applicable habitat conservation plan or natural community conservation plan. The project would not result in the congregation of persons, or introduce a new use into the project area.

The **No Project** alternative would not result in any changes to land use, so would not have any impacts related to land use.

The impacts of the **Medium Density Development Alternative** related to land use would be similar to the proposed project. However, this alternative would need to request a change to the General Plan designation, zoning, and LCP designation for the project site to Medium Density Residential in order for the development density to be consistent with these documents.

The impacts of the **Reduced Number of Units Alternative** related to land use would be similar to the proposed project. However, this alternative would need to request a change to the General Plan designation, zoning, and LCP designation for the project site to Low Density Residential in order to be consistent with these documents. This alternative would also be consistent with the land use policies designating this parcel for affordable housing development, but to a lesser degree than the proposed project, because fewer affordable units would be developed.

The impacts of the **Existing PUD Zoning Alternative** related to land use would be similar to the proposed project. No change to the General Plan, zoning, or LCP designation for the site would not need to be amended, as this alternative is consistent with these designations. This alternative would also be consistent with the land use policies designating this parcel for affordable housing development, but to a lesser degree than the proposed project, because fewer affordable units would be developed.

### Mineral Resources

The analysis of mineral resources on the project site did not identify the presence of any mineral resources or any impacts related to their extraction or use.

Thus, none of the four alternatives to the proposed project would be conflict with any known mineral resources or their use on the project site.

### Noise and Vibration

The **proposed project** would result in noise impacts related to project construction.

Under the **No Project (No Build) Alternative**, no noise impacts related to construction or operations would occur.

Under the **Medium Density Development Alternative**, development would cover the entire site, so construction would be closer to neighboring homes (see Figure 5). Thus, impacts related to construction noise would be somewhat greater than under the proposed project since construction noise would occur closer to nearby sensitive receptors. Because this alternative would involve the same number of units as the proposed project, it would generate the same amount of additional traffic noise as the proposed project. The construction of the proposed project could create a greater risk of vibration impacts on neighboring properties, as

it would be more difficult to ensure that all construction would be more than 20 feet from neighboring properties.

Under the **Reduced Number of Units Alternative**, homes could be concentrated in the center of the site, further away from neighboring homes (Figure 2). Thus, impacts related to construction noise would be similar, but somewhat less than under the proposed project because some construction noise would occur further from nearby sensitive receptors and would be of a shorter duration. Because fewer units would be constructed, it would generate less traffic noise than the proposed project. The construction of the proposed project would be less likely to create a significant vibration impact on neighboring properties, as it would be easier to design so that construction would occur more than 20 feet from existing residences.

Under the **Existing PUD Zoning Alternative**, because the whole of the site would be graded and construction would be closer to neighboring homes, impacts related to construction noise would be greater than for the proposed project, because construction noise would occur closer to nearby sensitive receptors and would be of a longer duration. Because more units would be constructed, it would generate more traffic noise than the proposed project. In addition, because the number of units means that nearly the entire site would be developed under this alternative, it is more likely that the construction of the proposed project could create a significant vibration impact on neighboring properties.

### Population and Housing

The analysis of population and housing on the project site identified did not identify any significant impacts related to population and housing.

Thus, none of the four alternatives to the proposed project would induce population growth in the Mid-Coast area, as no changes to land use would occur under the No Project (No Build) Alternative, and the other alternatives would be constructed on a property adjacent to an existing residential area, and would not need to extend public infrastructure to serve them. As there is no housing currently on the project site, none of the alternatives would result in the displacement of any housing.

### Public Services and Utilities

Under the **proposed project**, no significant impacts would occur to public services.

Under the **No Project (No Build) Alternative**, no development would occur, so no public services or utilities would be needed to serve the project site.

Under the **Medium Density Development Alternative**, the same number of units would be constructed as under the proposed project. Therefore, impacts related to public services and utilities would be the same as the proposed project.

Under the **Reduced Number of Units Alternative**, although fewer units would be constructed, the service demands would be similar to the proposed project, and impacts related to public services would be the same.

Under the **Existing PUD Zoning Alternative**, many more units would be constructed compared to the proposed project, so more public services and utilities would be required to serve the project. The impacts on these services and utilities would be greater under this alternative than under the proposed project. Because the project would include market rate residences for which no water supply allocation has been reserved, it is not known if water supply and sewage treatment capacity would be adequate to serve this alternative.

## Recreation

Under the **proposed project**, no significant impacts would occur to recreation resources.

Under the **No Project (No Build) Alternative**, no development would occur, so no recreation facilities would be needed to serve the project site.

Under the **Medium Density Development Alternative**, the same number of units would be constructed as under the proposed project. Therefore, impacts related to recreation resources would be the same as the proposed project.

Under the **Reduced Number of Units Alternative**, although fewer units would be constructed, the service demands would be similar to the proposed project, and impacts related to recreation would be the same.

Under the **Existing PUD Zoning Alternative**, many more units would be constructed compared to the proposed project, so more recreation resources would be required to serve the project. The impacts on these facilities would be greater under this alternative than under the proposed project. It is not known if existing and planned recreation resources would be adequate to serve this alternative.

## Transportation and Circulation

An analysis of the trips generated by the **proposed project** and each of the alternatives was prepared by Kittelson. The results of the Kittelson analysis are summarized in Table 2. The proposed project would generate 37 am peak hour, 45 pm peak hour, and 37 Saturday peak hour trips. It would result in significant impacts related to increases in delay on the stop-controlled legs at three intersections of local streets with SR 1. Proposed mitigation would include: the closure of the SR 1 / Carlos Street to all but emergency vehicles; the installation of a signal or roundabout at the SR 1/California Avenue/Wienke Way intersection; and the restriction of turning movements at two other intersections. In addition, significant impacts to pedestrian safety, for which the provision of additional sidewalks, and to transit service, for which changes to the transit route serving the neighborhood are proposed. Because none of these improvements is entirely within the jurisdiction of San Mateo County to complete, these impacts were found to be significant and unavoidable.

<b>Table 2 Land Use Alternative Trip Generation Comparison</b>				
Alternative	Number of Units	AM Peak Hour Trips	PM Peak Hour Trips	Saturday Peak Hour Trips
Proposed Project	71	37	45	37
No Project Alternative	0	0	0	0
Medium Density Development Alternative	71	37	45	37
Reduced Number of Units Alternative	31	17	20	17
Existing PUD Zoning Alternative	148	77	93	77

*Source: ITE Trip Generation Manual, 9th Edition; Kittelson & Associates, 2017*

Under the **No Project (No Build) Alternative**, no housing would be developed on the project site, so no additional trips would be generated by the site, and no impacts would occur at project intersections, and no impacts related to safety, public transit, or pedestrians would occur.

Under the **Medium Density Alternative**, the same number of units would be constructed as under the proposed project. This alternative would generate the same number of am peak, pm peak, and Saturday peak hour trips as the proposed project. Because this alternative would be constructed on the same site as the proposed project, and would generate the same number of trips, the impacts to intersections would be the same as under the proposed project. Because it would be constructed on the same site, the impacts related to pedestrian safety and transit would be the same as the proposed project as well.

Under the **Reduced Number of Units Alternative**, only 31 units of housing would be constructed. This alternative would generate less than half the number of trips as the proposed project (17 am peak hour trips, 20 pm peak hour trips, and 17 Saturday peak hour trips). The impacts of this alternative on intersections would be similar to, but less than the impacts of the proposed project because fewer trips would be generated. Impacts to pedestrian safety and transit would be the same as the proposed project.

Under the **Existing PUD Zoning Alternative**, 148 units of housing would be constructed. This alternative would generate roughly twice the number of trips as the proposed project (77 am peak hour trips, 93 pm peak hour trips, and 77 Saturday peak hour trips). The impacts of this alternative on intersections would likely be greater than the impacts of the proposed project, impacting intersections to a greater degree, and possibly affecting other intersections. Impacts to pedestrian safety and transit would be the same as the proposed project.

### **Tribal Cultural Resources**

No Tribal Cultural Resources were identified on or nearby to the project site through the cultural resources report or through outreach to Native American tribes. Therefore, the proposed project would not have any impacts on Tribal Cultural Resources.

Because no Tribal Cultural Resources were identified on or nearby to the project site, none of the alternatives to the proposed project, all of which are on the same parcel, would have any impacts on these resources.

### Wildfire

The **Proposed Project** would not have any significant impacts related to wildfire, because the project is not located within a location with a high risk of wildfires. In addition, the project will meet modern building standards which are more fire resistant, and is located very near to a fire station.

The **No Project (No Build) Alternative** would not result in the construction of any housing units or any other changes to the project site, so it would not change result in any changes related to wildfire risks.

Under the **Medium Density Alternative**, development on the project site would be similar to that under the Proposed Project, so the wildfire risks would be similar to those under the proposed project.

Under the **Reduced Number of Units Alternative**, development on the project site would be similar to that under the Proposed Project, so the wildfire risks would be similar to those under the proposed project.

Under the **Existing PUD Zoning Alternative**, development on the project site would be similar to that under the Proposed Project, so the wildfire risks would be similar to those under the proposed project, though there would be more housing units on the site.

## 4.7 STEP 7: IDENTIFY ENVIRONMENTALLY SUPERIOR ALTERNATIVE

CEQA requires the selection of an environmentally superior alternative; however, if the environmentally superior alternative is the “No Project” alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives (CEQA Guidelines Section 15126.6(e)(2)). In the case of the Cypress Point, the No Project Alternative is the most effective of the evaluated alternatives in reducing or avoiding the environmental effects of the proposed project. However, based on a comparative evaluation of all the action alternatives, the Reduced Number of Units Alternative would reduce the magnitude of the most environmental impacts because it would result in the least land and the fewest units developed (Table 1). This alternative would be the environmentally superior alternative.

However, the Reduced Number of Units Alternative would fail to meet all of the project objectives, and would meet others to a lesser extent than the proposed project. It would not meet Objectives #1 and #3 to the same extent as the proposed project, because it would provide fewer affordable housing units. It would not meet Objective #2, in that the much lower

number of units to be developed would make it less cost effective and less competitive for financing. It would, however, meet Objective #6 to a greater degree than the proposed project by leaving a larger proportion of the project site as open space.

## REFERENCES

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