

Smith Field Park Improvements Project

Public Review Draft Initial Study/ Mitigated Negative Declaration

APRIL 2025

PREPARED FOR
City of Half Moon Bay

PREPARED BY
SWCA Environmental Consultants

**SMITH FIELD PARK IMPROVEMENTS PROJECT
PUBLIC REVIEW DRAFT INITIAL STUDY/
MITIGATED NEGATIVE DECLARATION**

Prepared for

City of Half Moon Bay
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SWCA Project No. 76060

April 2025

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Acronyms and Abbreviations

AB	Assembly Bill
ABAG	Association of Bay Area Governments
ADA	Americans with Disabilities Act
APN	Assessor's Parcel Number
AQP	Air Quality Plan
BAAQMD	Bay Area Air Quality Management District
BAWSCA	Bay Area Water Supply and Conservation Agency
BMP	best management practice
BRE	Biological Resources Evaluation
BSA	Biological Study Area
CAL FIRE	California Department of Forestry and Fire Protection
CalEEMod	California Emissions Estimator Model
CalRecycle	California Department of Resources Recycling and Recovery
Caltrans	California Department of Transportation
CBC	California Building Code
CCAP	San Mateo County Community Climate Action Plan
CCC	California Coastal Commission
CCR	California Code of Regulations
CCWD	Coastside County Water District
CDFW	California Department of Fish and Wildlife
CDMG	California Department of Mines and Geology
CGS	California Geological Survey
CO ₂	carbon dioxide
CO ₂ e	carbon dioxide equivalent
COA	Condition of Approval
CDOC	California Department of Conservation
CDP	Coastal Development Permit
CEQA	California Environmental Quality Act
CFPD	Coastside Fire Protection District
CH ₄	methane
City	City of Half Moon Bay
CLT	Coastside Land Trust
CNDDB	California Natural Diversity Database
CO	carbon monoxide
CO ₂	carbon dioxide
COA	Condition of Approval
County	County of San Mateo
CRHR	California Register of Historical Resources
CRLF	California red-legged frog
CUSD	Cabrillo Unified School District

CY	cubic yards
dbh	diameter at breast height
DMA	drainage management area
DTSC	California Department of Toxic Substances Control
DWR	California Department of Water Resources
ESCP	Erosion and Sediment Control Plan
ESHA	Environmentally Sensitive Habitat Area
FEMA	Federal Emergency Management Agency
GHG	greenhouse gas
GIP	Green Infrastructure Plan
IS/MND	Initial Study/Mitigated Negative Declaration
kV	kilovolt
kW	kilowatt
LCP	Local Coastal Program
LCIP	Local Coastal Implementation Plan
LCLUP	Local Coastal Land Use Plan
LID	Low Impact Development
MBTA	Migratory Bird Treaty Act
mgd	million gallons per day
MMRP	Mitigation Monitoring and Reporting Plan
MRZ	Mineral Resource Zone
MSL	mean sea level
MTCO _{2e}	metric tons of carbon dioxide equivalent
N ₂ O	nitrous oxide
NO _x	nitrogen oxides
NPDES	National Pollution Discharge Elimination System
NRCS	Natural Resources Conservation Service
NRHP	National Register of Historic Places
OHWM	ordinary high-water mark
PFAS	polyfluoroalkyl substances
PG&E	Pacific Gas and Electric Company
PM _{2.5}	particulate matter 2.5 microns or less in diameter
PM ₁₀	particulate matter 10 microns or less in diameter
POST	Peninsula Open Space Trust
PRC	California Public Resources Code
project	Smith Field Park Improvements Project
PUD	Planned Unit Development
ROG	reactive organic gases
RWQCB	Regional Water Quality Control Board
SAM	Sewer Authority Mid-Coastside
SamTrans	San Mateo County Transit District
SFGS	San Francisco garter snake

SFPUC	San Francisco Public Utilities Commission
Sheriff's Department	San Mateo County Sheriff's Department
SMCWPPP	San Mateo Countywide Water Pollution Prevention Program
SO ₂	sulfur dioxide
SSC	Species of Special Concern
State	State of California
State Water Board	State Water Resources Control Board
SVP	Society of Vertebrate Paleontology
SWCA	SWCA Environmental Consultants
SWPPP	Stormwater Pollution Prevention Plan
TAC	toxic air contaminant
USFWS	U.S. Fish and Wildlife Service
USGS	U.S. Geological Survey
VHFHSZ	Very High Fire Hazard Severity Zone
VMТ	vehicle miles traveled
VOC	volatile organic compound
WUI	wildland-urban interface

CITY OF HALF MOON BAY
CALIFORNIA ENVIRONMENTAL QUALITY ACT
INITIAL STUDY AND CHECKLIST

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a “potentially significant impact” as indicated by the checklist on the following pages.

- | | | |
|---|--|---|
| ☐ Aesthetics | ☐ Greenhouse Gas Emissions | ☐ Public Services |
| ☐ Agriculture and Forestry Resources | ☐ Hazards and Hazardous Materials | ☐ Recreation |
| ☐ Air Quality | ☐ Hydrology and Water Quality | ☐ Transportation |
| ☐ Biological Resources | ☐ Land Use and Planning | ☐ Tribal Cultural Resources |
| ☐ Cultural Resources | ☐ Mineral Resources | ☐ Utilities and Service Systems |
| ☐ Energy | ☐ Noise | ☐ Wildfire |
| ☐ Geology and Soils | ☐ Population and Housing | ☐ Mandatory Findings of Significance |

DETERMINATION (To be completed by the Lead Agency)

On the basis of this initial evaluation:

- ☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- ☒ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- ☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- ☐ I find that the proposed project MAY have a “potentially significant impact” or “potentially significant unless mitigated” impact on the environment, but at least one effect (a) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (b) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENT IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- ☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Signature

Maziar Bozorginia

Date

4/24/2025

Printed Name

Maziar Bozorginia

INITIAL STUDY CHECKLIST

BACKGROUND

PROPONENT NAME

City of Half Moon Bay

PHONE NUMBER650-726-7177

PROPONENT ADDRESS

501 Main Street

Half Moon Bay, CA 94019

AGENCY REQUIRING CHECKLIST

City of Half Moon Bay

Public Works Department

DATE SUBMITTED**PROPOSAL NAME**Smith Field Park Improvements Project

CHAPTER 1. INTRODUCTION

1.1 Project Background

Project Title: Smith Field Park Improvements Project
Initial Study/Mitigated Negative Declaration

Lead Agency: City of Half Moon Bay
Public Works Department
501 Main Street
Half Moon Bay, CA 94019

City Staff Contact: Jonathan Woo, Assistant Engineer
Maz Bozorginia, Public Works Director

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Project Applicants: City of Half Moon Bay, Public Works Department

The subject of this Initial Study/Mitigated Negative Declaration (IS/MND) under the California Environmental Quality Act (CEQA) is the proposed Smith Field Park Improvements Project (project), which consists of the replacement and upgrade of existing park facilities, including five ballfields (one lit for nighttime use), a dog park, a parking lot, and horseshoe pits, on Assessor's Parcel Number [APN] 065-011-160, totaling approximately 29.25 acres, at 201 Wavecrest Road, Half Moon Bay, San Mateo County, California. The property is owned by the City of Half Moon Bay (City) and the City has filed a lot merger to combine two lots into one. The proposed improvements to Smith Field Park include installation of a new waterline within the right-of-way at Wavecrest Road, upgrades to the park's parking area to include paved access and paved parking spaces (including accessible spaces), upgrades to the youth baseball fields, construction of a new concession and restroom building, upgrades to the existing multi-use field to an all-weather multi-use field (soccer, baseball, softball), establishment of a picnic/barbecue area and interpretive walking trail, expansion of the dog park (conceptually separated into large and small dog areas), installation of a children's play area, new picnic area, additional active sport court uses, upgrades to Field 3, improvements to lighting and other utilities, and upgrades to park landscaping. The property contains several Environmentally Sensitive Habitat Areas (ESHAs), which would be conserved as part of the project.

Construction of Phase 1 of the project is anticipated to commence in Spring 2026 and is scheduled to last approximately 6 months, ending in Fall 2026. To the extent possible, construction would occur between the spring and fall ball league schedules. Construction of Phase 2 would take a total of 12 months to complete, but would likely be accomplished in smaller individual stages as funding allows. This IS/MND is prepared in conjunction with the required Coastal Development Permit (CDP) application and includes a description of the existing environmental setting of the project and the environmental effects that may result from construction and operation of the full buildout of all phases of the project.

1.2 CEQA Statute and Guidelines

According to CEQA Statute, Public Resources Code Section 21064.5:

MITIGATED NEGATIVE DECLARATION

“Mitigated negative declaration” means a negative declaration prepared for a project when the initial study has identified potentially significant effects on the environment, but (1) revisions in the project plans or proposals made by, or agreed to by, the applicant before the proposed negative declaration and initial study are released for public review would avoid the effects or mitigate the effects to a point where clearly no significant effect on the environment would occur, and (2) there is no substantial evidence in light of the whole record before the public agency that the project, as revised, may have a significant effect on the environment.”

According to State of California (State) CEQA Guidelines Article 6. Negative Declaration Process:

15070. DECISION TO PREPARE A NEGATIVE OR MITIGATED NEGATIVE DECLARATION

A public agency shall prepare or have prepared a proposed negative declaration or mitigated negative declaration for a project subject to CEQA when:

- (a) The initial study shows that there is no substantial evidence, in light of the whole record before the agency, that the project may have a significant effect on the environment, or
- (b) The initial study identifies potentially significant effects, but:
 - (1) Revisions in the project plans or proposals made by, or agreed to by the applicant before a proposed mitigated negative declaration and initial study are released for public review would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur, and
 - (2) There is no substantial evidence, in light of the whole record before the agency, that the project as revised may have a significant effect on the environment.

15071. CONTENTS

A Negative Declaration circulated for public review shall include:

- (a) A brief description of the project, including a commonly used name for the project, if any;
- (b) The location of the project, preferably shown on a map, and the name of the project proponent;
- (c) A proposed finding that the project will not have a significant effect on the environment;
- (d) An attached copy of the Initial Study documenting reasons to support the finding; and
- (e) Mitigation measures, if any, included in the project to avoid potentially significant effects

CHAPTER 2. PROJECT DESCRIPTION

2.1 Project Overview

Smith Field Park is an approximately 13.2-acre City-owned park located at 201 Wavecrest Road on APN 065-011-160. The project consists of the replacement and upgrade of the recreation facilities in the existing park and expansion of the park from 13.2 to approximately 16 acres. The project includes improvements to parking, pedestrian and vehicular access, and recreational facilities, including a paved parking lot, ballfields, a children's play area, an off-leash dog park, picnic areas, and a walking path, as well as landscaping, drainage, lighting, and utility improvements.

2.2 Project Location

2.2.1 Regional Setting

The project site is located at the west end of Wavecrest Road off Cabrillo Highway South (Highway 1) in the city of Half Moon Bay, San Mateo County, California. San Mateo County is situated along the central coast of California and encompasses approximately 554 square miles (including tidal waters) of the San Francisco Peninsula. The county's western border is on the Pacific Ocean and the eastern border is on the San Francisco Bay shoreline. San Mateo County is bounded by the City and County of San Francisco to the north and Santa Cruz and Santa Clara Counties to the south and southeast, respectively.

The Santa Cruz Mountain Range traverses San Mateo County in a north-south direction, effectively dividing the county into two distinct regions: the Coastsides and the Bayside. The Coastsides is characterized by coastal terraces transitioning into the gently sloping foothills of the Santa Cruz Mountains. The Bayside is characterized by low-lying mudflats, marshes, artificial fill, and broad, flat alluvial plains. Farther west, this low-lying region transitions into the foothills of the Santa Cruz Mountains, increasing in slope to 15% to 30% near its crest. Half Moon Bay is situated on the Coastsides, approximately 25 miles south of San Francisco, and encompasses approximately 6.4 square miles of land. The city is bordered by the Pacific Ocean to the west, the Santa Cruz Mountains to the east, and unincorporated San Mateo County to the north and south. Figure 2-1 shows the project site location and regional vicinity.

2.2.2 Local Setting

The project site is in the Wavecrest Planned Development Area (Wavecrest), which is primarily undeveloped. The Wavecrest property is a 206-acre open space area bordered by Seymour Street to the north, Wavecrest Road to the south, Highway 1 to the east, and the Pacific Ocean to the west. The project site is located at the west end of Wavecrest Road, approximately 0.34 miles east of the Pacific Ocean and the California Coastal Trail, and 0.33 miles west of Highway 1 and the Naomi Patridge Trail (Figure 2-2). Wavecrest is open space managed by Peninsula Open Space Trust (POST) and Coastsides Land Trust (CLT) and is made up of several parcels. Uses on the Wavecrest lands adjacent to the project site include open space and dry-farming hay production on the 80-acre North Wavecrest parcel located 300 feet to the north, open space to the south, open space to the east, and open space, hiking, and birdwatching to the west. The California Coastal Trail is an 11.5-mile trail that runs north-south adjacent to the bluffs. It extends from Pillar Point Harbor in the north to the Cowell-Purissima Trail in the south. The existing Coastal Trail through Wavecrest is an informal dirt trail. The CLT is in the process of implementing a trail expansion project through Wavecrest, which would create 2.7 miles of new, compacted gravel trails connecting Poplar Beach in the north to Redondo Beach in the south.¹

¹ Coastsides Land Trust. 2025. Wavecrest Trail Expansion. Available at: <https://www.coastsidelandtrust.org/wavecrest-trail-extension-1>. Accessed April 3, 2025.

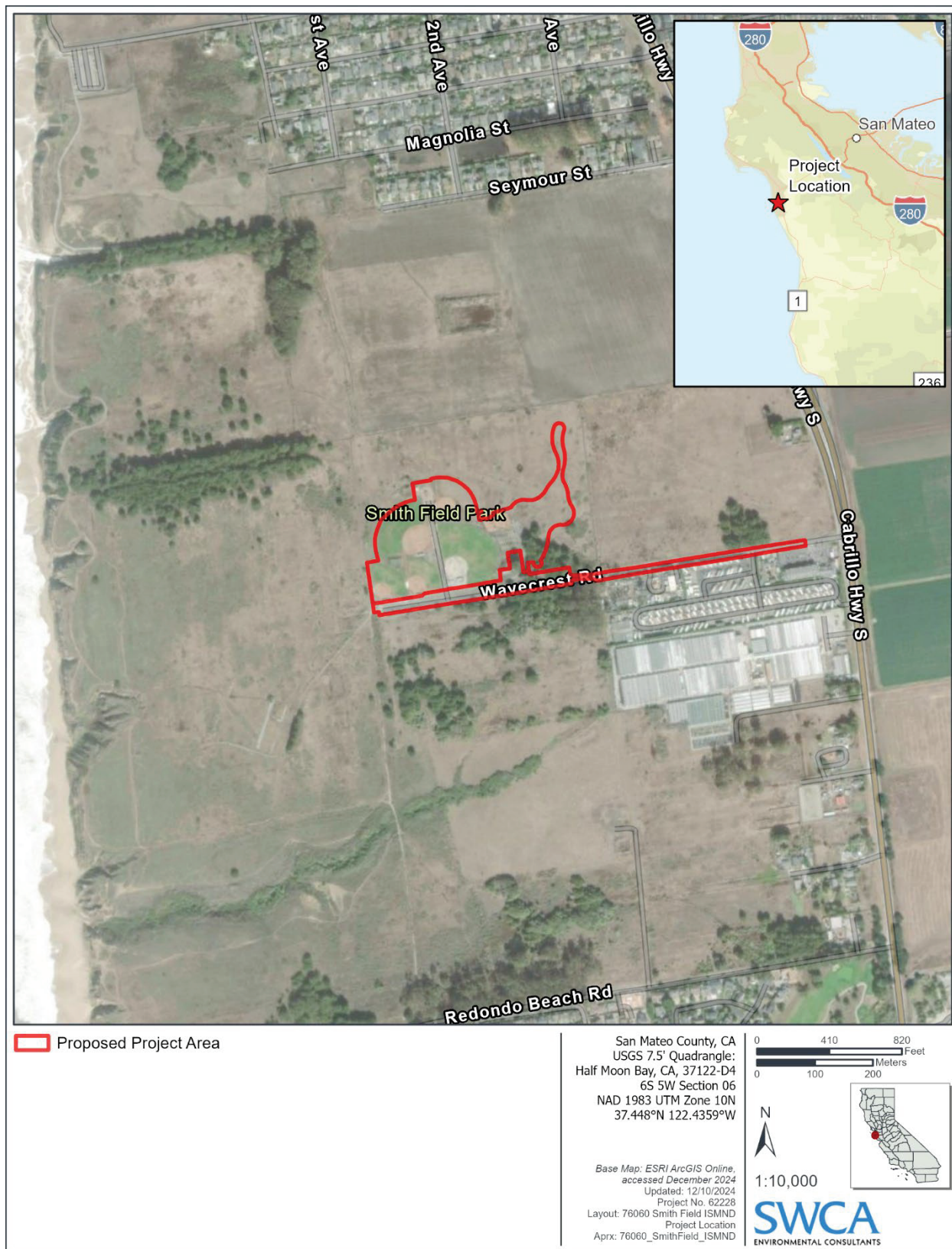


Figure 2-1. Project location map.



Figure 2-2. Project vicinity map.

On the south side of Wavecrest Road, land uses include a floriculture business, Half Moon Bay RV Park, Aristocrat Hotel, and Cameron's Pub and Restaurant to the southeast of Smith Field Park. The Half Moon Bay RV Park, approximately 0.1 miles southeast of the project area, is the closest sensitive receptor. The nearest residential development area is located on Seymour Street, approximately 0.3 miles north. Additionally, there are a few scattered farmhouses between 0.3 and 0.35 miles to the east and southeast close to Highway 1.

2.2.3 Existing Use and Facilities

The project site is the existing Smith Field Park—a 13.2-acre community park on a 29.25-acre parcel owned by the City—which includes a parking lot, ballfields, horseshoe pits, and a fenced off-leash dog park, as well as access to Wavecrest Open Space and the California Coastal Trail (Figures 2-3 through 2-7). The park currently serves the Half Moon Bay (HMB) Little League, Junior Giants, City recreation, Half Moon Bay Horseshoe Club, and dog owners. The park is maintained by the City in cooperation with user groups, including HMB Little League, Half Moon Bay Horseshoe Club, and the local dog park users group. The City mows the fields and maintains the parking lot. HMB Little League maintains the ballfields, related facilities, snack shack, and restrooms; the dog park user group helps the City maintain the dog park; and the Half Moon Bay Horseshoe Club helps maintain the horseshoe pits.

The project site includes a dirt/gravel parking area; five ballfields with bleachers, dugouts, batting cages, and storage facilities; a concession stand/restroom building; 16 horseshoe pits; and a fenced off-leash dog park. One field (Field 3) has lighting for nighttime use. The project site also includes two remnant World War II (WWII) concrete storage buildings, an aboveground water storage tank, and an associated shipping container used as a water pump house. There is a trailhead at the southwestern corner of the park that accesses Wavecrest Open Space and allows access to the California Coastal Trail and Pacific Ocean (see Figure 2-3).

PARKING AND ACCESS

Access to Smith Field Park by car is limited to Wavecrest Road, which narrows from approximately 25 to 15 feet in width in the vicinity of the park. There is a sidewalk on the south side of Wavecrest Road that ends approximately 880 feet east of the park gate. Bicycle and pedestrian access is limited in the project vicinity. However, bicycle and pedestrian access is offered from the California Coastal Trail via Wavecrest Open Space lands (see Figures 2-2 through 2-4).

The main parking lot on the southern frontage of the park is approximately 70 feet wide by 720 feet long. This gravel parking lot is subject to potholes, erosion, and washboarding due to lack of drainage and is currently maintained by City staff. There are also small gravel and earth parking areas adjacent to the horseshoe pits/dog park and Field 5 (see Figure 2-3).

BALLFIELDS

There are five existing ballfields on the project site. Fields 1, 2, 4, and 5 are used by several groups, including HMB Little League and Junior Giants, among others. Field 3 is a multi-use field used by the City for recreational softball and other activities, as well as by youth baseball for practices (see Figures 2-3, 2-5, and 2-6). Field 3 has lights for evening use. All five fields are natural turf and mowed by City staff. The remainder of the maintenance is done by HMB Little League, who also use and maintain a food concession/snack shack/office, the batting cages, and several storage buildings.²

² City of Half Moon Bay. 2022. *Smith Field Park Master Facilities Plan*. July. Available at: <https://www.half-moon-bay.ca.us/DocumentCenter/View/5039/2022-07-18-Smith-Field-Park-Master-Facilities-Plan-Booklet?bidId=>. Accessed October 29, 2024.

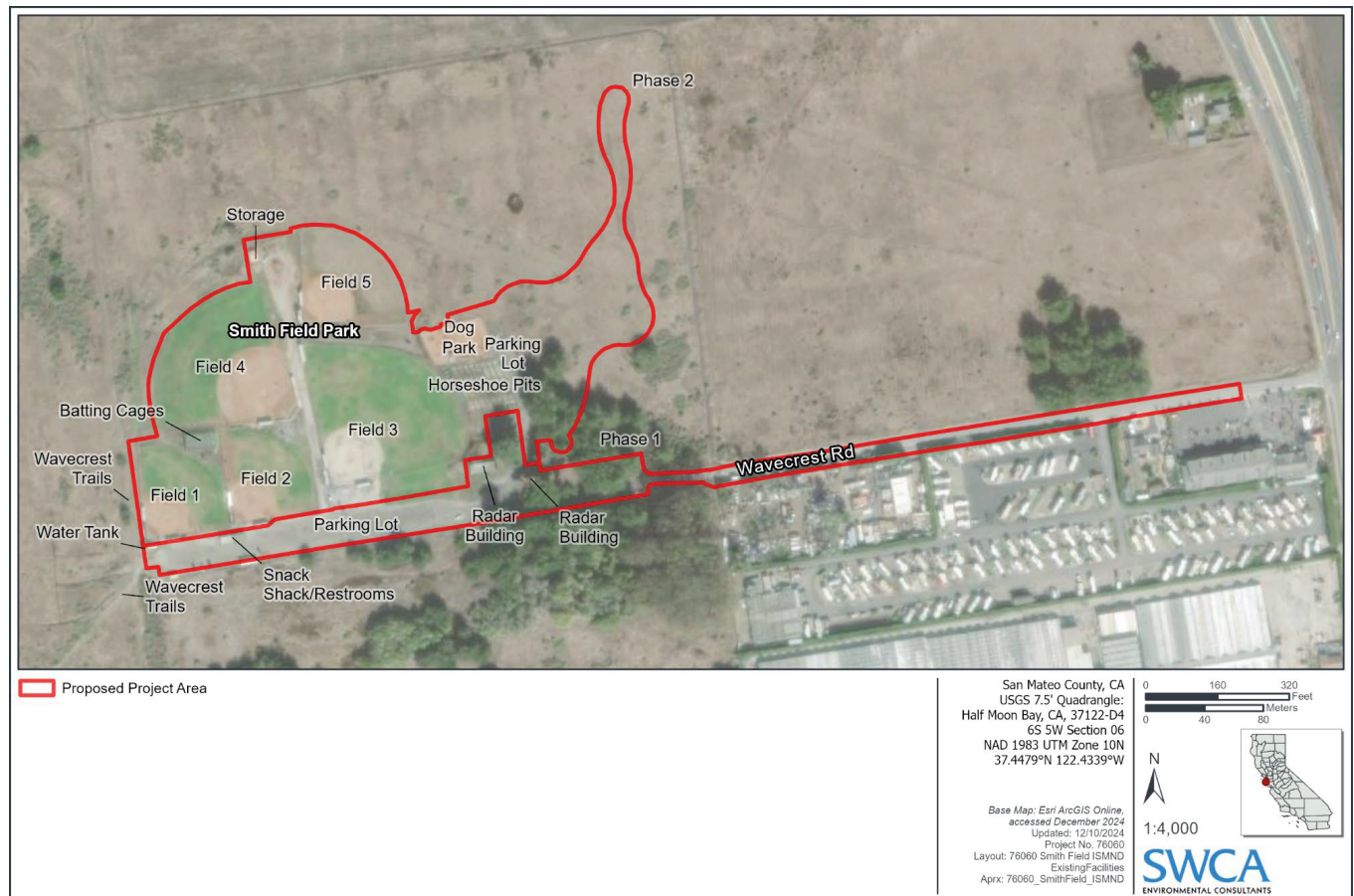


Figure 2-3. Existing facilities map.



Figure 2-4. View of access to Wavecrest Road from the parking lot, facing east.



Figure 2-5. View of the parking lot and Field 1, facing northwest.



Figure 2-6. View of Field 4 with batting cages, with Field 1 and open space in the background, facing southwest.



Figure 2-7. View of Half Moon Bay Dog Park, with Highway 1 and Seymour Street in the background, facing northeast.

DOG PARK

Smith Field Park includes an approximately 0.3-acre fenced dog park, which is maintained by the local dog park group in conjunction with City staff (see Figure 2-3). The fenced area is mulched with wood chips that get replaced annually; the mulch is considered hard to maintain and difficult to walk on for those with limited mobility (see Figure 2-7). The Half Moon Bay Dog Park includes a small, well-worn storage building and several well-worn picnic tables. The City maintains a portable restroom nearby.³ The existing dog park does not provide separate facilities for large and small dogs.

HORSESHOE PITS

Sixteen horseshoe pits are located on approximately 0.3 acres south of the dog park (see Figure 2-3). The horseshoe pits are used and maintained by the Half Moon Bay Horseshoe Club, which hosts 21 tournaments a year.⁴

WAVECREST AND COASTAL TRAIL ACCESS

The southwestern corner of the parcel allows access to Wavecrest Open Space and trails that are popular with hikers and birdwatchers (see Figure 2-3). The trails access has minimal signage or amenities (Figures 2-8 and 2-9). Smith Field Park provides access to walking trails in and through the Wavecrest Open Space. The Wavecrest trails provide access to the bluffs, beach, and California Coastal Trail, which are all approximately 0.35 miles to the west of Smith Field Park.⁵ Access to Wavecrest Beach is 0.35 miles west via Wavecrest trails, Poplar Beach is approximately 1 mile to the northwest via Wavecrest trails and the California Coastal Trail, and Redondo Beach is approximately 0.80 miles to the southwest via Wavecrest trails and Redondo Beach Road.

OTHER FACILITIES

The southeastern corner of the parcel holds three abandoned buildings and two structures that were associated with a former 1942 radar station (Radar Station L-82). The radar station was originally part of an early warning system during WWII that closed in 1951.⁶ An operations building and two adjacent concrete radar equipment cradles (without antennae) are located on the north side of Wavecrest Road, to the immediate west of a dirt road that runs north from Wavecrest Road to access the horseshoe pits and dog park. The former powerhouse building is located opposite the dirt road from the operations building, just northwest of the entrance to Smith Field Park. The former radar structures will not be altered as part of the project.

³ City of Half Moon Bay. 2022. *Smith Field Park Master Facilities Plan*. July. Available at: <https://www.half-moon-bay.ca.us/DocumentCenter/View/5039/2022-07-18-Smith-Field-Park-Master-Facilities-Plan-Booklet?bidId=>. Accessed October 29, 2024.

⁴ City of Half Moon Bay. 2022. *Smith Field Park Master Facilities Plan*. July. Available at: <https://www.half-moon-bay.ca.us/DocumentCenter/View/5039/2022-07-18-Smith-Field-Park-Master-Facilities-Plan-Booklet?bidId=>. Accessed October 29, 2024.

⁵ City of Half Moon Bay. 2022. *Smith Field Park Master Facilities Plan*. July. Available at: <https://www.half-moon-bay.ca.us/DocumentCenter/View/5039/2022-07-18-Smith-Field-Park-Master-Facilities-Plan-Booklet?bidId=>. Accessed October 29, 2024.

⁶ SWCA Environmental Consultants (SWCA). 2023. *Cultural Resource Technical Report for the Smith Field Master Plan Project, Half Moon Bay, San Mateo County, California*. Prepared for City of Half Moon Bay. March.



Figure 2-8. View of the entrance to Wavcrest Open Space, facing west.



Figure 2-9. Wavcrest Open Space signage.

There are a number of shipping containers throughout the park that are used as storage facilities by the City, HMB Little League, and other groups. The shipping containers are not weatherproof and will be replaced as part of the project. A large portion of the project site outside of the developed field areas contains sensitive habitat, including wetlands, which restricts further development of the project site. There is a stormwater drainage ditch located on the north side of Wavcrest Road known as the Wavcrest Watercourse. It begins from a culvert, approximately 50 feet west of Highway 1, that originates east of Highway 1, crosses near Wavcrest Road, drains west and north surrounding the Smith Field Park parcel, and continues towards the Seymour Ditch. The Wavcrest Watercourse/Seymour Ditch carries a significant amount of stormwater from east of Highway 1 and discharges into the Pacific Ocean approximately 0.45 miles northwest of the project area in line with Seymour Street (see Figure 2-2). Wavcrest Road has curbs and gutters along part of the south side of the street, to approximately 600 feet east of the project site.

The existing park is essentially flat, sloping slightly to the north into open space land. Stormwater from the project site enters the open field to the north by drainage pipes and overland flow and either percolates into the ground or enters Seymour Ditch and eventually the Pacific Ocean. The elevation varies from approximately 62 to 70 feet above mean sea level (MSL). There are existing stormwater drains and sump pumps to drain stormwater from the ballfields into the open space to the north; however, the stormwater system is not sufficient to drain the fields.

UTILITIES AND DRAINAGE

Existing facilities include a 2-inch-diameter water line that feeds into a storage tank in the southwestern corner of the property. The storage tank and associated shipping container/water pump house provide water to the park. These facilities supply water to the irrigation system, restrooms, and snack shack.

Field 3 is the only field with lights for evening use. There are six existing light poles located around the perimeter of Field 3.

LAND USE AND ZONING

The project site is approximately 0.34 miles east of the Pacific Ocean and is in the California Coastal Zone. The California Coastal Zone was established by the California Coastal Act and is under the jurisdiction of the California Coastal Commission. Chapter 3 of the California Coastal Act includes

provisions that address the impact of development on public services, infrastructure, traffic, the environment, significant resources, and coastal access.

The California Coastal Act of 1976 requires every coastal city and county to have a Local Coastal Program (LCP) to plan for and regulate land use in the coastal zone. The *City of Half Moon Bay Local Coastal Land Use Plan* (2020 LCLUP)⁷ was adopted by the City in 2020, certified by the California Coastal Commission in 2021, and implements the California Coastal Act policies within the city. The City's Zoning Ordinance, Subdivision Ordinance, and zoning map constitute the Local Coastal Implementation Plan (LCIP) for the City. The 2020 LCLUP and LCIP together constitute the City's LCP.

The project site is designated as Planned Unit Development (PUD) under the City's zoning code and has a land use designation of City Parks (CI) under the 2020 LCLUP.⁸ The California Coastal Commission has confirmed that the LCLUP is the guiding document for development in the city of Half Moon Bay. The project site is an existing park and the project will add improvements to park facilities.

A CDP is required for the project, and the City is the designated agency responsible for CDP review and conditional approval of projects within the City limits.

The project site is surrounded by several seasonal wetlands and one intermittent stormwater drainage ditch known as the Wavecrest Watercourse/Seymour Ditch. Per the 2020 LCLUP, the seasonal wetlands are considered ESHAs.⁹ The project has been designed to avoid and protect all wetland areas.

2.3 Proposed Project

2.3.1 Project Overview

In July 2022, the City completed the *Smith Field Park Master Facilities Plan*¹⁰ based on input from the community, which offered redesign options for Smith Field Park to better serve all Half Moon Bay residents. The proposed project would expand the park from 13.2 acres to approximately 16 acres and includes the following improvements (Figure 2-10):

- Replace the existing 2-inch water line in the Wavecrest Road alignment with a new 2,150-foot, 8-inch water line and install a new fire hydrant to serve the project;
- Install new drainage/Low Impact Development (LID) stormwater facilities;
- Pave the existing access road and parking lot, including Americans with Disabilities Act (ADA) parking and access;
- Upgrade the existing ballfields, including new natural turf, bleachers, dugouts, batting cages, and equipment storage;

⁷ City of Half Moon Bay. 2020. *City of Half Moon Bay Local Coastal Land Use Plan 2020 Comprehensive Update*. October 20. Available at <https://www.half-moon-bay.ca.us/DocumentCenter/View/3784/Full-Combined-2020-HMB-LCLUP>. Accessed October 28, 2024.

⁸ City of Half Moon Bay. 2024. City of Half Moon Bay Zoning Map. Available at: <https://www.half-moon-bay.ca.us/DocumentCenter/View/129/Zoning-Map-PDF?bidId=>. Accessed October 28, 2024.

⁹ City of Half Moon Bay. 2020. *City of Half Moon Bay Local Coastal Land Use Plan 2020 Comprehensive Update, Chapter 6: Natural Resources*. October 20. Available at <https://www.half-moon-bay.ca.us/154/Local-Coastal-Program-Land-Use-Plan>. Accessed October 28, 2024.

¹⁰ City of Half Moon Bay. 2022. *Smith Field Park Master Facilities Plan*. July. Available at: <https://www.half-moon-bay.ca.us/DocumentCenter/View/5039/2022-07-18-Smith-Field-Park-Master-Facilities-Plan-Booklet?bidId=>. Accessed October 29, 2024.

- Create one multi-use field (Field 3) with either synthetic or natural turf and facilities for baseball, softball, kickball, and soccer;
- Construct a new concession stand/restroom building with separate trash/recycling/composting facilities;
- Construct a new children's playground with play structures and permeable rubberized play surface;
- Construct a plaza adjacent to the playground with picnic areas, barbeques, restroom, and separate trash/recycling/composting facilities;
- Expand the dog park, including either synthetic or natural turf, creating separate areas for large and small dogs, benches, and storage;
- Develop an approximately 2,440-foot-long ADA-compliant compacted earth walking trail with benches;
- Upgrade the access point to Wavecrest Open Space, including a kiosk, bench, bike station, dog station, and trash/recycling/composting facilities;
- Remove approximately 33 trees, including 25 heritage trees. Plant native and low-water plants throughout the project site, including 82 Monterey cypress (*Cupressus macrocarpa*), mayten (*Maytenus boaria*), and strawberry (*Arbutus marina*) trees (15-gallon, 24-inch box, 36-inch box, and 72-inch box trees). At least 33 of the trees will be 24-inch box size or larger, meeting the City's Heritage Tree Replacement requirement ratio of 1:1; and
- Remove and relocate the horseshoe pits.

As shown in Figure 2-10, upon project completion, the size of the park boundary would increase from 13.2 acres to approximately 16 acres, representing an increase of 2.8 acres over existing conditions. The increased acreage is primarily from the new off-leash dog park and walking paths to the east. The proposed project would avoid surrounding ESHAs. Preliminary site design plans are included in **Appendix A**.

2.3.2 Project Facilities and Improvements

PARKING AND ACCESS

The existing parking lot would increase slightly in area and would be paved and striped to include approximately 196 regular parking spaces and five ADA-compliant parking spaces in the main parking lot. In addition, there would be 15 regular parking spaces and two ADA-compliant parking spaces in the small lot adjacent to the picnic area, playground, and dog park. The project would have a total of approximately 218 parking spaces, including seven ADA-compliant parking spaces. The amount of routine leveling and maintenance required for the paved parking lot would be reduced compared to the existing gravel parking lot.

BALLFIELDS

As shown in the project site plan (see Figure 2-10), existing Fields 1, 2, 4, and 5 would remain in approximately the same locations. These four fields would have new natural turf. Each field would have new facilities, including bleachers and dugouts. Existing signage would be reused to the greatest extent possible. There would be a paved access road with emergency turnaround to provide access to Fields 4 and 5 and storage facilities at the end of the access road. A new plaza with a concession (snack shack)/restroom building and picnic area would be constructed central to the playing fields.

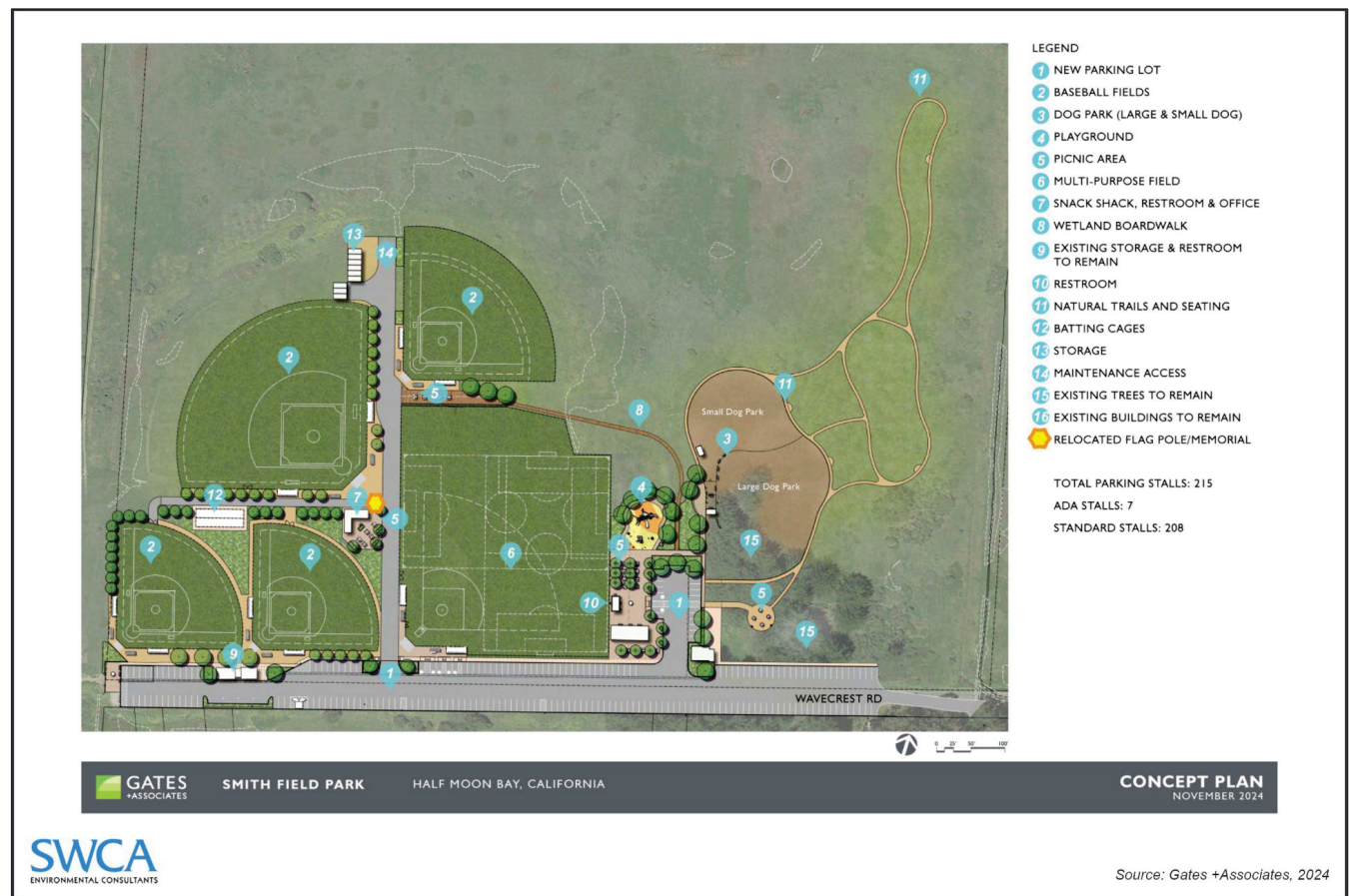


Figure 2-10. Smith Field Park site plan.

The existing Field 3 would remain in the same general location, but would be converted into a multi-purpose playing field that could be used for various sports, including softball, soccer, kick ball, and baseball. Field 3 would either have a synthetic or natural turf field, as well as new bleachers and a dugout, and continue to include lighting for evening activities. All fields would have new approximately 10-foot-tall fencing with 20-foot-tall tension netting, for a combined 30 feet, along baselines and between the fields and the parking lot.

PICNIC AREAS

The project would create several new picnic areas throughout the park that would provide seating and spaces for pre- and post-game socializing, as well as viewing areas for users of the dog park and play area and for the public to enjoy the natural surroundings.

PLAYGROUND AND PLAZA

The project would create a new children's playground and plaza where the existing dog park and horseshoe pits are located. The playground surface would be a permeable rubberized play surface and the playground would contain new play structures suitable for ages 2 through 5 and 6 through 12.

Adjacent to the playground, the project would include a new plaza hardscape area with picnic tables, barbecues, and benches and a new permanent restroom building, trash/recycling/composting facilities, and an entry kiosk. A small parking lot would serve the plaza, playground, and dog park. A wooden boardwalk would lead from the small parking area to Fields 4 and 5.

DOG PARK

The *Half Moon Bay Parks Master Plan*¹¹ recommended expanding opportunities for off-leash dogs, providing a range of activities for dogs, and accommodating a variety of dog sizes and types. The existing dog park would be relocated east of its current location, expanded to approximately 1.07 acres, and include separate spaces for large and small dogs (0.68 and 0.39 acres, respectively). Each area would be provided with a new water fountain with dog bowl and spigot, storage building, benches, and wire mesh dog fencing. The new dog park would be underlain with a synthetic turf system appropriate for pet areas.

NATURE PATH

The project would create a new 2,440-foot-long low-impact nature trail with benches for seating and interpretive signage. The nature trail would allow access to the natural open space areas to the east of the existing park while protecting surrounding wetlands and other sensitive habitat.

WAVECREST OPEN SPACE ACCESS

The project includes new trailhead facilities at the entrance to Wavecrest Open Space at the southwestern corner of the park, including signage, a kiosk, trash receptacles, a dog station with dog waste bags and a dog fountain, and a protected place for gathering.

¹¹ City of Half Moon Bay. 2019. *Half Moon Bay Parks Master Plan*. January. Available at: <https://www.half-moon-bay.ca.us/620/Parks-Master-Plan-609#:~:text=Project%20Description%3A%20The%20Parks%20Master,over%20the%20next%2015%20years>. Accessed October 29, 2024.

MAINTENANCE/STORAGE

The project would include a consolidated storage area at the end of the new maintenance access road in the northern portion of the park, which will allow for increased storage space for both the HMB Little League and the City Maintenance Division. This would replace the existing shipping containers that are currently used for storage.

UTILITIES

The improvements to Smith Field Park require the installation of new utility services for water, wastewater, stormwater, and electrical service. No natural gas lines would be included in the project. The sanitary sewer lines for the new restroom and snack shack will be tied into existing infrastructure on Wavecrest Road.

The project would include the removal of the existing water system, including the 2-inch water main, piping, water tank, pump house, meters, valves, and irrigation system. A new approximately 2,150-foot long 8-inch water main would be installed, originating from 200 feet west of Highway 1, and would be tied into the restroom, snack shack, water fountains, irrigation system, and fire water system. Water use would not substantially change compared to existing conditions since the number of fields would remain the same; existing irrigation facilities would be replaced and additional restroom and water fountains would be included as part of the project.

Additional lighting would be installed to illuminate Field 3 and the parking lot. Six light standards currently illuminate Field 3. These would be removed and replaced by nine light standards that are better positioned to direct light onto the field. Lighting would consist of low-intensity fixtures that are shielded, down-cast, and concealed to the extent feasible from public viewing areas and sensitive habitat. All lighting would be more energy efficient, downward-facing, shielded, and designed to reduce glare and spillover to adjacent neighborhoods and adjacent sensitive habitat.

STORMWATER AND DRAINAGE

The project would remove the existing stormwater drainage system, including piping and sump pumps. These would be replaced with a system of stormwater drains and bioretention areas and basins adequate to contain a 10-year, 2-hour storm. Overflow would drain into the vacant field to the north.

Phase 1 of the project would add 112,558 square feet (2.58 acres) of hardscape (concrete and paving) and Phase 2 would add 31,623 square feet (0.73 acres) of hardscape for total of 144,181 square feet (3.31 acres) of new or replacement hardscape. The project would result in a net increase of approximately 83,977 square feet (1.9 acres) of new impervious surface area, which includes the paved drive and parking lot, plazas and picnic areas, paved walkways, and rooftops (see Appendix A). The project would be required to comply with the *City of Half Moon Bay Green Infrastructure Plan* (GIP)¹² to control runoff. Permanent green infrastructure would be implemented as bioretention basins and planters that would filter contaminants from stormwater runoff before directing stormwater to the open space areas surrounding the park.

Stormwater drainage would be directed to six bioretention catch basins located throughout the development to reduce sedimentation and contamination to the adjacent open space, including adjacent wetlands, from surface water runoff. Stormwater outfalls would release to existing open fields surrounding the project area.

¹² City of Half Moon Bay. 2019. *City of Half Moon Bay Green Infrastructure Plan*. September. Available at: <https://www.half-moon-bay.ca.us/DocumentCenter/View/2305/HalfMoonBayGIPlan09-2019Final1>. Accessed November 1, 2024.

LANDSCAPING

New landscaping would include planting approximately 80 trees as well as shrubs and perennials. Restoration areas would be hydroseeded. Bioretention areas would be planted with facultative plant species.

Of the 231 trees on the project site, 33 existing trees would be removed, including 32 Monterey cypress and one Monterey pine (*Pinus radiata*); 25 of the trees to be removed meet the description of heritage trees per the City's Municipal Code (Section 7.40.020).¹³ The heritage trees range in size from 12.3 to 133.8 inches diameter at breast height (dbh). Per the City's Municipal Code, the heritage trees would be replaced "on a one-for-one basis with a minimum size twenty-four-inch box specimen tree" (Section 7.40.060).¹⁴ The project proposes to plant approximately 90 new trees comprised of eighty 24-inch box trees and ten 36-inch box trees throughout the development, which includes a replacement ratio for the 25 heritage trees of approximately 2.7:1. Additionally, the project would incorporate predominantly native plant landscaping throughout the park.

2.3.3 Construction

The project would be constructed in at least two phases. Phase 1 would include utility installation, parking lot improvements, water main extension/fire hydrant installation, irrigation upgrades, and pavement restoration and rehabilitation on Wavecrest Road.

Phase 1 project demolition would include:

- grubbing and grading of construction areas;
- removal of 33 trees, including 25 heritage trees;
- removal of existing water line, water tank, pump house and pump, meters, sump pumps, and irrigation system;
- removal of ballfield structures that are adjacent to the existing parking area, including some existing fencing, bleachers, and some light poles;
- trenching for new utilities (primarily water); and
- removal of existing Wavecrest Road pavement, paving, and some buildings.

Existing signs, some light poles, and a utility vault will be salvaged and/or relocated. An existing storage container, portable office, two light poles, and three existing buildings would remain in place.

Phase 1 construction would include:

- paving the parking lot;
- pouring concrete sidewalks, the plaza, and picnic areas;
- pouring rubberized play surface and playground facilities;

¹³ City of Half Moon Bay. 2024. Municipal Code Section 7.40.020: Heritage Tree Defined. Available at: <https://www.codepublishing.com/CA/HalfMoonBay/html/HalfMoonBay07/HalfMoonBay0740.html#7.40.020>. Accessed November 1, 2024.

¹⁴ City of Half Moon Bay. 2024. Municipal Code Section 7.40.020: Heritage Tree Defined. Available at: <https://www.codepublishing.com/CA/HalfMoonBay/html/HalfMoonBay07/HalfMoonBay0740.html#7.40.060>. Accessed November 1, 2024.

- installing new fencing and lighting; and
- installing GIP stormwater facilities and landscaping.

Phase 2 would include construction of the remaining elements of the project, dependent on acquisition of funding.

The horseshoe pits would be removed in one of the last stages of the project, allowing the use of the horseshoe pits during the initial stages. The horseshoe pits would be relocated to a different park, likely near the Johnston House/Train Station.

The project would disturb approximately 16 acres during all phases of construction. The project would cover a temporary disturbance area of 206,000 square feet (4.7 acres) in Phase 1, which includes installation of the water line in Wavecrest Road, and 656,000 square feet (15.1 acres) in Phase 2. The existing ground surface would be grubbed and graded and would require excavation of approximately 1,352 cubic yards (CY) of cut and 31,294 CY of fill. Demolition would produce approximately 1,800 tons of debris to be exported from the project site. Approximately 29,942 CY of fill would be imported to the project site. Cut and fill amounts for Phase 1 and Phase 2 are shown in Table 2-1.

Table 2-1. Quantities of Cut and Fill During Project Construction

Phase	Cut (CY)	Fill (CY)	Imported Fill (CY)
Phase 1	1,087	2,490	1,403
Phase 2	265	28,804	28,539
Total	1,352	31,294	29,942

Excavation depths would not exceed 26 inches to create the proposed valley gutter on the south side of the parking lot. Excavations for light poles could also reach 26 inches. Cut and fill would be balanced on-site to the extent feasible. Approximately 1,800 tons of demolition materials from grubbing; tree removal; excess soils, dirt, and existing base; and existing infrastructure (building materials, fencing, piping, etc.) would be hauled off-site for composting, disposal, or recycling. Hot Mix Asphalt, concrete, bioretention soil, dirt, play structures, picnic amenities, potential synthetic turf, building materials, landscape plants, and fencing would be imported to the project site. Assuming a 16-CY truck, project activities would generate approximately 1,872 round-trip haul truck trips for imported fill and materials and exported materials.

Construction activities would include equipment such as excavators, dozers, compactors, pavers, backhoes, graders, delivery trucks, concrete trucks, dump trucks, asphalt trucks, a cement mixer, a scraper, a backhoe, a forklift, a steel drum roller, a water truck, and hand tools such as saws and hammers. Construction vehicles would also include construction worker vehicles and vendor deliveries. All construction vehicles would be parked on-site.

CONSTRUCTION SCHEDULE

Phase 1 construction would likely start in spring 2026 and end in fall 2026 (approximately April–September), spanning approximately 6 months. Phase 1 would occur in five stages: demolition (1 month), drainage/utilities trenching and installation (2 months), rough grading (1 month), fine grading (1 month), and paving (1 month). Work is expected to occur 5 days per week, 8 hours per day.

The timeline for Phase 2 has not been determined; however, all Phase 2 activities are projected to take approximately 12 months total. The timing for implementation of Phase 2 activities will be dependent on the availability of funding and may be divided into several stages. Therefore, the timing of construction of specific elements has not yet been determined.

Construction hours would be limited to 7:00 a.m. to 6:00 p.m., Monday through Friday, and no construction is anticipated on Saturdays, Sundays or holidays, except as expressly authorized by the City (Municipal Code Chapter 14.40).^{15,16}

2.4 Requested Action and Required Permits

This IS/MND provides environmental information and analysis in compliance with CEQA, which is necessary for City decision-makers to be able to adequately consider the effects of the project. The City, as the CEQA Lead Agency, has approval authority and responsibility for considering the environmental effects of the project as a whole. Table 2-2 summarizes the permits and approvals required for the project.

Table 2-2. Agency Permit Requirements

Agency	Approval/Permit Required
City of Half Moon Bay	Coastal Development Permit
City of Half Moon Bay	Adoption of IS/MND
California Department of Transportation	Transportation Permit for Oversize/Overweight Vehicles
State Water Resources Control Board	Construction Stormwater General Permit

¹⁵ City of Half Moon Bay. 2021. Noise Restrictions. Available at: <https://www.half-moon-bay.ca.us/210/Noise-Restrictions>. Accessed November 5, 2024.

¹⁶ City of Half Moon Bay. 2024. Municipal Code Chapter 14.40: Hours of Construction. Available at: <https://www.codepublishing.com/CA/HalfMoonBay/html/HalfMoonBay14/HalfMoonBay1440.html>. Accessed November 1, 2024.

CHAPTER 3. ENVIRONMENTAL CHECKLIST AND RESPONSES

3.1 Aesthetics

Environmental Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<i>Except as provided in Public Resources Code Section 21099, would the project:</i>				
(a) Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐
(b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☒	☐
(c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (public views are those that are experienced from publicly accessible vantage points). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☒	☐
(d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

Environmental Evaluation

a. Would the project have a substantial adverse effect on a scenic vista?

A scenic vista generally provides focal views of objects, settings, or features of visual interest, or panoramic views of large geographic areas of scenic quality, from a fixed vantage point or linear corridor, such as a roadway or trail. A significant impact would occur if a project introduced incompatible scenic elements within a field of view containing a scenic vista or substantially blocked views of an existing scenic vista.

Smith Field Park, the project site, is located approximately 0.34 miles west of Highway 1 at the South Town Center Gateway to the city, where south Main Street is visible from northbound Highway 1.¹⁷ The existing Smith Field Park facilities, primarily the fencing and light standards, are distantly visible from Highway 1 and the Naomi Patridge Trail across the broad ocean viewshed of Wavecrest (Figure 3.1-1).

Highway 1 within the City limits is identified as part of the Town Boulevard Scenic Corridor in the City's 2020 LCLUP Scenic and Visual Resources Element¹⁸ and provides a sweeping view of the historic James Johnston House, hillsides and ridgelines of the coastal mountains to the east, and ocean views, mature tree stands, wildlife and birds, and open spaces to the west.

¹⁷ City of Half Moon Bay. 2020. *City of Half Moon Bay Local Coastal Land Use Plan 2020 Comprehensive Update, Chapter 9: Scenic and Visual Resources*. October 20. Available at: <https://www.half-moon-bay.ca.us/154/Local-Coastal-Program-Land-Use-Plan>. Accessed December 2, 2024.

¹⁸ City of Half Moon Bay. 2020. *City of Half Moon Bay Local Coastal Land Use Plan 2020 Comprehensive Update, Chapter 9: Scenic and Visual Resources*. October 20. Available at: <https://www.half-moon-bay.ca.us/154/Local-Coastal-Program-Land-Use-Plan>. Accessed December 2, 2024.



Figure 3.1-1. Highway 1 looking southwest across Wavecrest Open Space towards Smith Field Park with the Naomi Patridge Trail in the foreground and the Pacific Ocean in the background.

Wavecrest Road is identified as a primary Scenic Coastal Access Route in the LCLUP Scenic and Visual Resources Element.¹⁹ It dead-ends at the Smith Field Park parking lot approximately 0.5 miles east of the Pacific Ocean. The parking lot, Wavecrest Open Space conservation area, and the Pacific Ocean are visible from the end of Wavecrest Road (Figure 3.1-2). Wavecrest Open Space and the California Coastal Trail are accessible from the parking lot.



Figure 3.1-2. Looking west from Wavecrest Road at the Smith Field Park parking lot with Smith Field Park facilities in the foreground and Wavecrest Open Space in the background.

¹⁹ City of Half Moon Bay. 2020. *City of Half Moon Bay Local Coastal Land Use Plan 2020 Comprehensive Update, Chapter 9: Scenic and Visual Resources*. October 20. Available at: <https://www.half-moon-bay.ca.us/154/Local-Coastal-Program-Land-Use-Plan>. Accessed December 2, 2024

Smith Field Park is identified in the LCLUP as providing scenic value and adding to the overall visual quality of the area. According to the LCLUP, “The City frequently plans for park improvements, including those that will enhance the scenic aspects of these facilities.”

The project would include replacing and upgrading existing facilities, adding new park facilities, and paving the existing parking lot, as well as removing 33 trees and adding landscaping, including 90 new trees. Thus, while the project would alter the existing visual character of the project site, it would add a playground, picnic area, and nature trail and replace the existing ballfield fencing and infrastructure, dog park, lighting, and parking lot with similar updated facilities, including trees and landscaping. Smith Field Park improvements would have an overall beneficial visual impact; therefore, the project would not adversely affect a scenic vista or obstruct views of visual resources, and this impact would be less than significant.

While the project site would be visible within panoramic views from Highway 1 and the Naomi Patridge Trail, the project site would look essentially the same from that distance, would continue to contribute to the existing rural setting of the area, and would not be more discernible than it is at present. Therefore, implementation of the project would not have a substantial adverse effect on a scenic vista, and this impact would be less than significant.

Construction impacts would include excavation, grading, and ground disturbance; heavy equipment operation and staging areas for equipment parking and material storage; and additional truck traffic on haul routes. Construction during Phase 1 would last approximately 6 months; therefore, short-term visual impacts due to construction would be temporary and less than significant. No mitigation is required.

b. Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings, within a scenic highway?

The project is visible in the distance from Highway 1, which is a State eligible scenic highway.^{20,21} The 2020 LCLUP identifies the need to protect “significant” views available along Highway 1, including the “sweeping views of the ocean, upland slopes, open spaces, and agricultural areas that make Half Moon Bay so distinctive and picturesque.”²² The project site is located on the west side of Highway 1 (approximately 0.34 miles west) at the South Town Center Gateway. As discussed in Impact Discussion 3.1.a, the existing facilities at the project site are visible in the distance (see Figure 3.1-1) and would be replaced by similar facilities, including fencing and light poles. The project would replace six existing light poles that are 61 to 80 feet in height with nine new light poles 70 to 90 feet in height. The difference in height would be approximately 10 feet, which would not create a noticeable difference when seen from Highway 1. New light fixtures would be Dark Sky-compliant.

An arborist report was prepared for the project in February 2023²³ (Appendix B) and a tree removal summary was completed as part of the design plans (see Appendix A). The project would remove

²⁰ An eligible State Scenic Highway is one identified in Section 263 of the Streets and Highways Code and may be nominated by local governments. To be converted to a designated State Scenic Highway, the local government agency must develop a Corridor Protection Program and submit it to the California Department of Transportation (Caltrans).

²¹ California Department of Transportation (Caltrans). 2024. *California State Scenic Highways System Map*. Available at: <https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways>. Accessed December 2, 2024.

²² City of Half Moon Bay. 2020. *City of Half Moon Bay Local Coastal Land Use Plan 2020 Comprehensive Update, Chapter 9: Scenic and Visual Resources*. October 20. Available at <https://www.half-moon-bay.ca.us/DocumentCenter/View/3784/Full-Combined-2020-HMB-LCLUP>. Accessed December 2, 2024.

²³ SWCA Environmental Consultants (SWCA). 2023. *Tree Inventory and Level 1 Arborist Assessment Results Memorandum for the Smith Field Project, Half Moon Bay, San Mateo County, California*. Prepared for City of Half Moon Bay. February 14.

approximately 33 trees from the project site—25 of these trees are heritage trees per the City’s Municipal Code Section 7.40.020, 24 of which are Monterey cypress and one is Monterey pine. The trees would be replaced at more than a 1:1 ratio on the project site with 80 trees that are a 24-inch box specimen tree and 10 trees that are a 36-inch box specimen tree (see Appendix A).

There are no rock outcroppings on or adjacent to the project site. There are several structures that are listed or eligible for listing that will not be altered as part of the project (see Section 3.5, *Cultural Resources*). Therefore, impacts to scenic resources within a scenic highway would be less than significant.

c. In non-urbanized areas, would the project substantially degrade the existing visual character or quality of public views of the site and its surroundings? (public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

The project site is located in a non-urbanized area on the west side of Highway 1 and surrounded by open space and agriculture (see Figures 2-4 through 2-7 and 3.1-1). The project site is distantly visible from the South Town Center Gateway to the city. Highway 1 within the City limits is identified as part of the Town Boulevard Scenic Corridor in the City’s 2020 LCLUP Scenic and Visual Resources Element²⁴ and provides a sweeping view of the ocean, open spaces, and south end of town in the project vicinity.

The project would add improvements to Smith Field Park that would be visually similar to the existing facilities. New fencing and lighting would be substantially similar to existing fencing and lighting. The paved parking lot and new concession stand/restroom building would be the most obvious changes from a distance, but would not substantially change the park-like setting of the existing facilities.

The project’s consistency with 2020 LCLUP policies is shown in Table 3.1-1.

Table 3.1-1. Project Consistency with 2020 LCLUP Policies

LCLUP Policy	Consistency
<u>Policy 9-1. Scenic and Visual Resource Areas.</u> Identify and protect scenic and visual resource areas in Half Moon Bay, including but not limited to the scenic corridors, natural resource areas, and built environment resources as defined in this chapter and designated on Figure 9-1.	<u>Consistent.</u> The project would construct improvements to an existing park, which would not substantially change the existing character of Smith Field Park.
<u>Policy 9-2. Scenic Resource Protection.</u> New development shall be sited and designed to protect views to and along the ocean, to minimize the alteration of natural land form, to be visually compatible with the character of its setting, and, where feasible, to restore and enhance visual quality in visually degraded areas.	<u>Consistent.</u> The project would make improvements to an existing park and would not appreciably change the visibility of the park or change the views along the ocean. Visual quality of the park would be enhanced by upgrading park facilities.

²⁴ City of Half Moon Bay. 2020. *City of Half Moon Bay Local Coastal Land Use Plan 2020 Comprehensive Update, Chapter 9: Scenic and Visual Resources*. October 20. Available at <https://www.half-moon-bay.ca.us/DocumentCenter/View/3784/Full-Combined-2020-HMB-LCLUP>. Accessed March 20, 2024.

LCLUP Policy	Consistency
<u>Policy 9-10. Fences, Walls and Landscaping.</u> Ensure that fences, walls, and landscaping shall not block public views of or from scenic and visual resource areas including along scenic corridors, at parks and beaches, and other scenic public viewing areas through height restrictions and required landscape maintenance.	<u>Consistent.</u> Currently, the taller structural elements, including chain-link fence and light standards, are distantly visible from Highway 1. The project would replace existing fencing and light standards and add new built elements, including a single-story concession stand/restroom building and playground, which would not significantly alter the visual attributes of the project site. Therefore, the improvements to Smith Field Park would not block views of scenic resources.
<u>Policy 9-12. Town Boulevard Scenic Corridor.</u> Require that new development in close proximity to or easily visible from the Town Boulevard scenic corridor, including Highways 1 and 92: - Protects views of visual resource areas as seen from the Town Boulevard, including views to the ocean, upland slopes (i.e. minimizes intrusions into the ridgeline), and the historic Johnston House; - Incorporates design standards such as screening of commercial parking areas and landscaping provisions; and - Is visually compatible with the surrounding land and development.	<u>Consistent.</u> The project site is located approximately 0.34 miles from Highway 1 and would include improvements to existing park facilities. The project would replace fences and light standards and introduce a new one-story concession stand/restroom building. Although the project is visible from Highway 1, the improvements would not appreciably change the view from Highway 1. The project site would upgrade existing park facilities and is visually compatible with existing development.
<u>Policy 9-15. Scenic Coastal Access Routes.</u> Require that new development on designated scenic coastal access routes from Highway 1 to the beach, including roadway improvements and development proposed in close proximity to the road, protects the scenic quality of the corridor and avoids obstruction or significant degradation of public ocean views such as through provision of sufficient setbacks from the public right-of-way, low building heights, and landscaping that establishes and/or maintains a scenic gateway.	<u>Consistent.</u> The project site is located at the western terminus of Wavecrest Road, which is a scenic coastal access route. The project would upgrade the existing facilities at Smith Field Park, including improving the access and scenic gateway to Wavecrest Open Space trails. Improvements include landscaping with native species, including 90 new trees, as well as paving the gravel parking lot. Therefore, the project would protect the scenic quality of the corridor and would not obstruct or degrade public ocean views.
<u>Policy 9-17. California Coastal Trail Views.</u> Ensure that views of the ocean, bluffs, upland slopes, and ridgelines from the California Coastal Trail are protected, particularly in areas adjacent to substantially undeveloped Planned Developments including Surf Beach/Dunes Beach, Venice Beach, West of Railroad, and North Wavecrest. Require sufficient setbacks, height limits, and other design standards for any new development permitted near the trail to minimize impacts to visual resources.	<u>Consistent.</u> The project includes improvements to an existing park and would not appreciably alter views of the park for the California Coastal Trail. Upgrades include new trailhead facilities at the access point to the Wavecrest Open Space, which also provides access to the California Coastal Trail.
<u>Policy 9-20. Significant Plant Communities.</u> Preserve the scenic quality of significant plant communities including but not limited to Monterey cypress and Monterey pine stands or rows, riparian vegetation along stream corridors, and non-invasive mature roadside trees to the extent feasible. Preservation may be achieved through siting and design of new development, compliance with habitat buffers required pursuant to Chapter 6. Natural Resources, minimizing significant alteration and removal, vegetation maintenance and restoration, and replanting as mitigation for removed vegetation where approved.	<u>Consistent.</u> The project would remove 33 trees to accommodate new park facilities but would plant 90 new trees throughout the park. Therefore, the project would replace removed trees at a 1:2.7 ratio.
<u>Policy 9-22. Open Space Conservation Areas.</u> Ensure that any development permitted within or adjacent to open space conservation areas is sited and designed to minimize impacts to public views of the conservation areas and to be visually compatible with the surrounding natural environment.	<u>Consistent.</u> The project would upgrade existing facilities at Smith Field Park and would not add facilities that would negatively affect public views of the adjacent Wavecrest Open Space. The project would enhance the trail entrance to the Wavecrest Open Space with a kiosk, informational signage, trash receptacles, a dog station with dog waste bags and a dog fountain, and a protected place for gathering.

LCLUP Policy	Consistency
Policy 9-29. Parks and Recreation Areas. New development in parks and recreation areas shall be sited and designed to be compatible with the surrounding area, to minimize alteration of natural landforms, and to improve any associated negative visual attributes such as excessive signs, waste receptacles, and paved areas.	Consistent. The project would upgrade existing facilities at Smith Field Park and would not add facilities that would negatively affect public views of the adjacent Wavecrest Open Space. The project would enhance the trail entrance to the Wavecrest Open Space with a kiosk, informational signage, trash receptacles, a dog station with dog waste bags and a dog fountain, and a protected place for gathering.
Policy 9-30. Dark Night Skies. Protect dark night skies as part of Half Moon Bay's scenic and visual character by preventing light pollution from development. Avoid impacts from exterior lighting on dark night skies, sensitive habitat areas, and agricultural operations by: a. Limiting exterior lighting to low-intensity fixtures that are shielded, down-cast, and concealed so that the light source is not directly visible from public viewing areas, with the exception of traffic lights, navigational lights, and other similar safety lighting; and b. Limiting installation and use of high-intensity perimeter lighting and lighting for sports fields, other private recreational facilities, or public facilities in scenic areas, with the exception of safety lighting provided that any high-intensity lighting is down-cast, shielded, and minimizes spillover.	Consistent. The project would comply with all lighting requirements of the City's Municipal Code. Lighting would consist of low-intensity fixtures that are shielded, down-cast, and concealed to the extent feasible from public viewing areas and sensitive habitat. The new facilities would be adjacent to existing sensitive habitat in Wavecrest Open Space and are not near any residential development. The project would improve existing exterior lighting compliance with Dark Skies requirements; all lighting would be downward-facing, shielded, and designed to reduce glare and spillover and therefore would not impact adjacent sensitive habitat.
Policy 9-31. Lighting Plan Review. Require submittal of lighting plans with applications for new development, including subdivisions, for review of lighting characteristics.	Consistent. The lighting plans would be submitted to the City for review and approval.
Policy 9-34. Signs. Ensure that signs are designed and located to minimize impacts to visual resource areas. Signs approved as part of commercial development shall be incorporated into the design of the project and shall be subject to height, width, and lighting limitations and design standards to ensure that signs are visually compatible with surrounding areas and protect views to and from visual resource areas. Prohibit placement of signs, excluding traffic or public safety signs, which obstruct views to the ocean or beaches from public viewing areas or public roads.	Consistent. The project would reuse existing signs where possible and include new low-impact informational signage for the nature path and at the entrance to the Wavecrest trails. All signs would meet City requirements and no new signage would block views or be illuminated. Therefore, project signage would be consistent with City requirements and would be visually compatible with the area.

As shown in Table 3.1-1, the project would be consistent with all LCLUP policies related to visual and aesthetic resources. Therefore, the project would not conflict with the LCLUP or other regulations governing scenic quality, and this impact would be less than significant.

d. Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

The proposed project would replace existing lighting for night use of Field 3. The six existing light standards range from 61 to 80 feet in height with a total of 34 fixtures. These would be replaced with nine new light standards from 70 to 90 feet in height with a total of 47 fixtures. The new fixtures would be more energy efficient and better positioned to direct light onto the field. Lighting would consist of low-intensity fixtures that are shielded, down-cast, and concealed to the extent feasible from public viewing areas and sensitive habitat. All lighting would be downward-facing, shielded, and designed to reduce glare and spillover to adjacent neighborhoods and adjacent sensitive habitat. The project would be in compliance with 2020 LCLUP Policy 9.30, Dark Night Skies, "limiting exterior lighting to low-intensity fixtures that are shielded, down-cast, and concealed so that the light source is not directly visible from public viewing areas, with the exception of traffic lights, navigational lights, and other similar safety lighting." Because the project would replace existing lighting with Dark Sky-compliant lighting, this impact would be less than significant.

3.2 Agriculture and Forestry Resources

Environmental Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<i>In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:</i>				
(a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
(b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
(c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒
(d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
(e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

Environmental Evaluation

a. Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

A significant impact may occur if a project were to result in the conversion of State-designated agricultural land from agricultural use to another non-agricultural use. The California Department of Conservation (CDOC) Division of Land Protection lists Prime Farmland, Unique Farmland, and Farmland of Statewide Importance under the general category of “Important Farmland” in California.

The project area contains no land that is designated by the CDOC as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. Smith Field Park is designated as Urban and Built-Up Land, and the surrounding parcels are designated Other Land. There is one parcel 300 feet north that is designated as Farmland of Local Importance and supports dry hay farming.²⁵ The project is an existing park and the proposed improvements would not alter existing uses or zoning on the project site. Therefore, no impact on the conversion of CDOC-designated farmland to non-agricultural uses would occur.

²⁵ California Department of Conservation (CDOC). 2018. San Mateo County Important Farmland Map. Available at: <https://maps.conservation.ca.gov/dlrp/ciftimeseries/>. Accessed December 3, 2024.

b. Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?

A significant impact may occur if a project were to result in the conversion of land zoned for agricultural use or under a Williamson Act contract from agricultural use to non-agricultural use. The Williamson Act of 1965 allows local governments to enter into agreements with local landowners with the purpose of trying to limit specific parcels of land to agricultural or other related open space use.

The project site is not zoned for agricultural use and is not subject to a Williamson Act contract. The current zoning is Planned Unit Development (PUD) and the land use designation is City Parks (CI). The nearest land under Williamson Act contract is approximately 0.3 miles east of the project site on the east side of Highway 1.²⁶ The nearest agricultural operation is the dry hay farming, approximately 300 feet north of the project site. Activities in Smith Field Park would not appreciably change from existing conditions and would have no impact on surrounding agricultural operations. Therefore, no impact with respect to land zoned for agricultural use or under a Williamson Act Contract would occur.

c. Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?

“Forest land” is defined in California Public Resources Code (PRC) Section 12220(g) as land that “can support 10-percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits.” “Timberland” is defined in PRC Section 4526 as land “which is available for, and capable of, growing a crop of trees of a commercial species used to produce lumber and other forest products, including Christmas trees.” Timberland zoned for Timber Production is defined in California Government Code Section 51104(g) as land that “is devoted to and used for growing and harvesting timber.”

There is no land zoned for timber production within the City limits, although there are several Christmas tree farms in unincorporated San Mateo County sited in Planned Agriculture Districts. As part of the project, 25 heritage trees would be removed from the project site, including Monterey cypress and Monterey pine trees. Although portions of the project site could meet the definition of forest land, these are adjacent to the existing park facilities. The project includes planting 90 new trees (eighty 24-inch specimen box and ten 36-inch specimen box trees). The project site is not zoned for management of forest or timberland resources; therefore, the project would not conflict with zoning for, or cause the rezoning of, forest land, timberland, or timberland zoned Timberland Production, and no impact would occur.

d. Would the project result in the loss of forest land or conversion of forest land to non-forest use?

The project site is surrounded by undeveloped lands and urban uses and is not located on forest land (as discussed in Impact Discussion 3.2.c). Although portions of the project site could meet the definition of forest land, these are adjacent to existing park uses and would not be impacted by the project; therefore, no impact related to the loss of forest land or conversion of forest land would occur.

²⁶ California Department of Conservation (CDOC). 2022. California Williamson Act Enrollment Finder. Available at: <https://maps.conservation.ca.gov/dlrp/WilliamsonAct/App/index.html>. Accessed December 3, 2024.

e. Would the project involve other changes in the existing environment, which due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?

A significant impact may occur if a project involves other changes to the existing environment that could result in the conversion of farmland to another non-agricultural use or conversion of forest land to non-forest use. As described in Impact Discussion 3.2.b, the project site is not currently zoned for agricultural use. It is an existing park and will remain in park use. Neither the project site nor the surrounding parcels are used for agricultural uses or forest land. The closest land in agricultural production is located approximately 300 feet north of the project area and would be buffered from the project site by the intervening open space. The uses at the project site would not change. The wooded area on the eastern edge of the park may meet the definition of forest land; however, any removed trees would be replaced as part of project landscaping. With this exception, there is no forest land in the vicinity of the project site. Therefore, no impact related to conversion of farmland to a non-agricultural use or conversion of forest land to non-forest use would occur.

3.3 Air Quality

Environmental Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<i>Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:</i>				
(a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
(b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☐	☒	☐
(c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
(d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

Environmental Evaluation

The analysis of air quality resources is based on the following documents prepared for the project:

- *Air Quality and Greenhouse Gas Technical Report for the Smith Field Park Improvements Project, San Mateo County, California, SWCA (March 2025) (Appendix C)*

a. Would the project conflict with or obstruct implementation of the applicable air quality plan?

The 2017 Clean Air Plan is the current applicable regional Air Quality Plan (AQP) for the San Francisco Bay Area Air Basin.²⁷ The primary goals of the 2017 Clean Air Plan are to protect public health and the

²⁷ Bay Area Air Quality Management District (BAAQMD). 2017. *2017 Clean Air Plan: Spare the Air, Cool the Climate*. Available at: https://www.baaqmd.gov/~media/files/planning-and-research/plans/2017-clean-air-plan/attachment-a_-proposed-final-cap-vol-1-pdf.pdf?la=en. Accessed February 20, 2025.

climate, and the plan acknowledges that the Bay Area Air Quality Management District's (BAAQMD's) two stated goals of protection are closely related. As such, the 2017 Clean Air Plan identifies a wide range of control measures intended to decrease both criteria pollutants and greenhouse gas (GHG) emissions. The development of the project would improve a community park. The proposed project does not involve substantial employment growth (none anticipated).

Determining consistency with the 2017 Clean Air Plan involves assessing whether applicable control measures contained in the 2017 Clean Air Plan are implemented and whether implementation of the proposed project would disrupt or hinder implementation of AQP control measures. The control measures are organized into five categories: 1) stationary and area source control measures; 2) mobile source measures; 3) transportation control measures; 4) land use and local impact measures; and 5) energy and climate measures. The control measures are geared toward traditional land uses (e.g., residential, commercial, industrial uses) and buildings. All control measures contained in the 2017 Clean Air Plan applicable to the project will be implemented. In addition, all projects within BAAQMD's jurisdiction are required to implement the BAAQMD standard control measures or best management practices (BMPs) during construction activities.²⁸ As discussed below, the proposed project would implement all BMPs for construction activities and would be consistent with the assumptions in the AQP. Furthermore, the proposed project would not include any special features that would disrupt or hinder implementation of the AQP control measures. Therefore, the proposed project would not obstruct implementation of the 2017 Clean Air Plan, and this impact would be less than significant.

Furthermore, the thresholds of significance, adopted by BAAQMD, determine compliance with the goals of attainment plans in the region. As such, emissions below the BAAQMD significance thresholds would not conflict with or obstruct implementation of the applicable air quality plans.²⁹ As Tables 3.3-1 through 3.3-3 show, the emissions from project construction and operations are below the thresholds of significance; therefore, the project does not conflict with implementation of the BAAQMD applicable AQPs. The project would also improve future fugitive dust emissions during operation by paving the parking lot, which is currently dirt and gravel.

b. Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard.

The BAAQMD's thresholds of significance represent the allowable emissions a project can generate without generating a cumulatively considerable contribution to regional air quality impacts. Therefore, a project that would not exceed the BAAQMD thresholds of significance on a project level also would not be considered to result in a cumulatively considerable contribution to these regional air quality impacts. The region is in non-attainment for federal and State ozone standards and federal and State particulate matter less than 2.5 microns in diameter (PM_{2.5}) standards. Impacts related to construction and operation of the proposed project are addressed separately below.

²⁸ Bay Area Air Quality Management District (BAAQMD). 2023. *2022 CEQA Guidelines Chapters*. Available at: <https://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa/updated-ceqa-guidelines>. Accessed February 20, 2025.

²⁹ Bay Area Air Quality Management District (BAAQMD). 2023. *2022 CEQA Guidelines Chapters*. Available at: <https://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa/updated-ceqa-guidelines>. Accessed February 20, 2025.

Construction

Project implementation would generate emissions of criteria air pollutants during construction. Construction of Phase 1 would last approximately 6 months. The estimated unmitigated emissions from Phase 1 construction of the project are summarized in Table 3.3-1. The detailed assumptions and calculations, as well as California Emissions Estimator Model (CalEEMod)³⁰ outputs, are provided in Appendix C.

As Table 3.3-1 shows, estimated unmitigated construction emissions for all pollutants are below BAAQMD significance thresholds. The combined construction emissions from all components of the proposed project are below the recommended BAAQMD thresholds of significance. Therefore, project construction would have a less-than-significant impact. However, BAAQMD BMPs, which are standard control measures, have been included as part of the project and will be included as Conditions of Approval (COAs) in the CDP to further reduce localized impacts.

Construction of Phase 2 would last approximately 12 months in total but may occur in smaller individual stages as funding allows. The estimated unmitigated emissions from the conservatively modeled Phase 2 construction of the project are summarized in Table 3.3-2. The detailed assumptions and calculations, as well as CalEEMod outputs, are provided in Appendix C.

Table 3.3-1. Unmitigated Phase 1 Construction Emissions Summary

Construction Year	Unmitigated Construction Emissions Summary					
	ROG	NO _x	CO	PM ₁₀	PM _{2.5}	SO ₂
Pollutant Emission (pounds per day)						
2026 Average Daily Emission	1.99	16.44	17.31	3.86	1.78	0.04
BAAQMD Significance Thresholds	54	54	N/A	82	54	N/A
Threshold Exceeded?	No	No	N/A	No	No	N/A
Pollutant Emission (tons per year)						
2026 Max Annual	0.36	3.00	3.16	0.70	0.32	0.007
BAAQMD Significance Thresholds	10	10	N/A	15	10	N/A
Threshold Exceeded?	No	No	N/A	No	No	N/A

Source: SWCA Environmental Consultants (SWCA). 2025. *Air Quality and Greenhouse Gas Technical Report for the Smith Field Park Improvements Project, San Mateo County, California*. Prepared for City of Half Moon Bay Public Works Department. March.

Notes: N/A = not applicable, no threshold; Emissions were quantified using CalEEMod version 2022.1 (CAPCOA 2022). Model results (summer, winter, and annual) and assumptions are provided in Appendix C.

As Table 3.3-2 shows, estimated unmitigated construction emissions for all pollutants, although conservative, are below BAAQMD significance thresholds. The combined construction emissions from all components of the proposed project are below the recommended BAAQMD thresholds of significance. Therefore, project construction would have a less-than-significant impact. However, BAAQMD standard control measures have been included as part of the project to further reduce localized impacts.

³⁰ California Air Pollution Control Officers Association (CAPCOA). 2022. California Emission Estimator Model (CalEEMod) and user guide. Version 2022.1. Available at: <http://www.caleemod.com/>. Accessed February 2025.

Table 3.3-2. Unmitigated Phase 2 Construction Emissions Summary

Construction Year ¹	Unmitigated Construction Emissions Summary					
	ROG	NO _x	CO	PM ₁₀	PM _{2.5}	SO ₂
Pollutant Emission (pounds per day)						
2027 Average Daily Emission	5.42	46.12	55.18	17.72	6.95	0.11
BAAQMD Significance Thresholds	54	54	N/A	82	54	N/A
Threshold Exceeded?	No	No	N/A	No	No	N/A
Pollutant Emission (tons per year)						
2027 Max Annual	0.99	8.42	10.07	3.23	1.27	0.020
BAAQMD Significance Thresholds	10	10	N/A	15	10	N/A
Threshold Exceeded?	No	No	N/A	No	No	N/A

Source: SWCA Environmental Consultants (SWCA). 2025. *Air Quality and Greenhouse Gas Technical Report for the Smith Field Park Improvements Project, San Mateo County, California*. Prepared for City of Half Moon Bay Public Works Department. March.

Notes: N/A = not applicable, no threshold; Emissions were quantified using CalEEMod version 2022.1 (CAPCOA 2022). Model results (summer, winter, and annual) and assumptions are provided in Appendix C.

¹ Although the total construction time of Phase 2 would be approximately 12 months, Phase 2 may be broken down into smaller individual stages as funding allows. In that case, pollutant emissions would be spread out over a longer period of time and both pounds per day and tons per year calculated emissions would therefore be reduced because emissions would be spread out over time.

As discussed, all construction projects within BAAQMD jurisdiction must comply with the BMPs regarding fugitive dust and equipment exhaust emissions.³¹ The required BMPs to be included in the project that are consistent with regional rules and regulations are as follows:

- Exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, unpaved access roads) shall be watered with non-potable water two times per day.
- All haul trucks transporting soil, sand, or other loose material off-site shall be covered.
- All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.
- All roadways, driveways, and sidewalks shall be paved as soon as possible.
- Idling times shall be minimized either by shutting equipment off when not in use or by reducing the maximum idling time to 5 minutes (as required by the California Airborne Toxics Control Measure in 13 California Code of Regulations [CCR] Section 2485). Clear signage shall be provided for construction workers at all access points.
- All construction equipment shall be maintained and properly tuned in accordance with the manufacturer's specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation. All equipment shall be checked by a certified visible emissions evaluator.
- A publicly visible sign shall be posted with the telephone number and person to contact at the City regarding dust complaints. This person shall respond and take corrective action within 48 hours of a complaint or issue notification. The BAAQMD's phone number shall also be visible to ensure compliance with applicable regulations.
- All vehicle speeds on unpaved roads shall be limited to 15 miles per hour.
- Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.

³¹ Bay Area Air Quality Management District (BAAQMD). 2023. *2022 CEQA Guidelines Chapters*. Available at: <https://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa/updated-ceqa-guidelines>. Accessed February 20, 2025.

The City will implement these BMPs, which would ensure compliance with BAAQMD’s rules and regulations for fugitive dust and equipment exhaust emissions. As such, the BAAQMD’s standard control measures will be included as COAs for the CDP, stipulated in contract requirements, and detailed on all construction plans.

Operations

Project operations are ongoing under the existing Smith Field Park operations. At the earliest, all of the proposed improvements described in Phase 1 and Phase 2 can be expected to be complete by 2028; therefore, the emissions calculations assume an operational year of 2028. The proposed improvements are not anticipated to substantively increase use or capacity of the park, as the number of fields will remain the same and the facilities, while updated, will remain largely the same in terms of capacity and function. Therefore, as under existing conditions, the proposed project would generate reactive organic gases (ROG), nitrogen oxides (NO_x), carbon monoxide (CO), sulfur dioxide (SO₂), particulate matter less than 10 microns in diameter (PM₁₀), and PM_{2.5} emissions from mobile sources, including vehicle trips; area sources, including the use of consumer products; architectural coatings for repainting; and landscape maintenance equipment, water, waste, offroad, stationary and energy sources. The estimated emissions from operation of the proposed project would be similar to those under existing operational conditions and are summarized in Table 3.3-3. Complete details of the emissions calculations are provided in Appendix C.

Table 3.3-3. Unmitigated Operational Emissions Summary

Operation Year 2028	Unmitigated Operational Emissions Summary					
	ROG	NO _x	CO	PM ₁₀	PM _{2.5}	SO ₂
Pollutant Emission (pounds per day)						
Mobile	1.21	1.16	12.27	3.75	0.97	0.038
Area	0.29	0.00	0.00	0.00	0.00	0.000
Energy	0.00	0.00	0.00	0.00	0.00	0.000
Off-Road	0.65	5.73	6.10	0.39	0.36	0.008
Stationary	0.54	1.51	1.96	0.08	0.08	0.003
Total	2.68	8.40	20.33	4.22	1.40	0.05
BAAQMD Significance Thresholds	54	54	N/A	82	54	N/A
Threshold Exceeded?	No	No	N/A	No	No	N/A
Pollutant Emission (tons per year)						
Mobile	0.2202	0.2115	2.2391	0.6852	0.1762	0.0070
Area	0.0526	0.0000	0.0000	0.0000	0.0000	0.0000
Energy	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.1184	1.0462	1.1139	0.0705	0.0648	0.0015
Total	0.0985	0.2752	0.3573	0.0145	0.0145	0.0005
BAAQMD Significance Thresholds	10	10	N/A	15	10	N/A
Threshold Exceeded?	No	No	N/A	No	No	N/A

Source: SWCA Environmental Consultants (SWCA). 2025. *Air Quality and Greenhouse Gas Technical Report for the Smith Field Park Improvements Project, San Mateo County, California*. Prepared for City of Half Moon Bay Public Works Department. March.

Notes: N/A = not applicable, no threshold; Emissions were quantified using CalEEMod version 2022.1 (CAPCOA 2022). Model results (summer, winter, and annual) and assumptions are provided in Appendix C.

As Table 3.3-3 shows, estimated unmitigated operational emissions for all pollutants are below BAAQMD significance thresholds. Also, project operations would meet the BAAQMD CO hotspot analysis screening criteria regarding traffic volumes at any affected intersection. Therefore, the proposed project would not need a CO hotspot analysis. Therefore, based on the above criteria, the proposed project would have a less-than-significant impact related to CO hotspots.

The combined construction emissions and combined operational emissions from all components of the proposed project are below the recommended BAAQMD thresholds of significance. Therefore, the project would not result in a cumulatively considerable net increase of any criteria pollutant, and this impact would be less than significant.

c. Would the project expose sensitive receptors to substantial pollutant concentrations?

While criteria pollutants (such as particulate matter (PM₁₀ and PM_{2.5}) are a concern at the regional level, community risk impacts from Toxic Air Contaminants (TACs) and annual PM_{2.5} exposure to nearby sensitive receptors are also a localized concern. While the discussion under Impact AQ-3 above addressed particulate matter at the regional level, this impact addresses particulate matter at the localized level. Impacts related to increased community risk can occur either by introducing new sensitive receptors, such as residences, in proximity to existing sources of TACs or by introducing a new source of TACs with the potential to adversely affect existing sensitive receptors in the project vicinity.

Implementation of the proposed project would not result in the long-term operation of any emission sources that would adversely affect nearby sensitive receptors. Short-term (6 months for Phase 1 and 12 months for Phase 2) construction activities could result in temporary increases in pollutant concentrations. The nearest sensitive receptors for construction would be the Aristocrat Hotel and Half Moon Bay RV Park, which will be adjacent to the waterline construction in Wavecrest Road. There are no sensitive receptors within 500 feet of Smith Field Park. The construction-related emissions would be short term and located at different locations within the project site. Although Phase 1 and Phase 2 construction would occur over 6 months and 12 months, respectively, construction of Phase 2 is likely to occur in smaller individual stages and each stage would last for a shorter time. The limited duration and limited quantities of construction emissions ensure that no individual receptor would be exposed to substantial pollutant concentrations. During construction, the BAAQMD BMPs would minimize construction impacts by reducing dust and exhaust emissions. Operations of the park as a result of the project would not change substantially. Therefore, construction and operation of the project would not expose sensitive receptors to substantial pollutant concentrations, and this impact would be less than significant.

d. Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Odors are usually associated with industrial projects involving the use of chemicals, solvents, petroleum products, and other strong-smelling elements used in manufacturing processes, as well as sewage treatment facilities and landfills. The project would improve facilities at an existing park. The project would not be a source of any odors during operations. During construction, a limited number of diesel engines would be operated on the project site for limited durations. Diesel exhaust and volatile organic compounds (VOCs) from these diesel engines would be emitted during construction of the proposed project, which are objectionable to some; however, the duration of Phase 1 and Phase 2 construction activities is expected to last approximately 6 months and 12 months, respectively, emissions would disperse rapidly from the project site, and diesel exhaust odors would be consistent with existing vehicle odors in the area. Considering this information, construction and operation of the proposed project would

not create other emissions or odors adversely affecting a substantial number of people; this impact would be less than significant.

3.4 Biological Resources

Environmental Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<i>Would the project:</i>				
(a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☒	☐	☐
(b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?	☐	☒	☐	☐
(c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☒	☐	☐
(d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☒	☐	☐
(e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☒	☐	☐
(f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

Environmental Evaluation

The analysis of biological resources is based on the following document prepared for the project:

- *Biological Resources Evaluation for the Smith Field Improvements Project, Half Moon Bay, California* (BRE), SWCA (January 2023) (Appendix D)
- *Preliminary Jurisdictional Delineation Report for the Smith Field Project, Half Moon Bay, San Mateo County, California*, SWCA (January 2023) (Appendix E)

a. Would the project have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

A significant impact would occur if a project were to remove or modify habitat for any species identified or designated as a candidate, sensitive, or special-status species in regional or local plans, policies, or

regulations, or by the U.S. Fish and Wildlife Service (USFWS) or California Department of Fish and Wildlife (CDFW).

The BRE³² analyzed the project area and a 200-foot buffer surrounding the project area, collectively defined as the Biological Study Area (BSA) for the project. The project site is located on and adjacent to the existing Smith Field Park and would upgrade facilities at and expand the existing park from 13.2 acres to approximately 16 acres. The project site is located on a marine terrace approximately 74 to 96 feet above MSL and approximately 0.34 miles east of the Pacific Ocean. The project site is relatively flat but drains generally towards the north into open fields. The project site is an existing park with ballfields, a dog park, and horseshoe pits, and is accessed by Wavecrest Road and a graveled parking lot. The project site includes several minor ephemeral drainage ditches and one human-made intermittent stormwater ditch, Wavecrest Watercourse, located on the north side of Wavecrest Road (see Figures 2-2 and 2-3). The project site also contains several small single-parameter seasonal wetlands.

The project site consists of an asphalted roadway, recreational development (including ballfields, a dog park, and horseshoe pits), and undeveloped land dominated by a mix of native and non-native vegetation. Seven habitat types were mapped in the BSA and include coyote brush scrub (*Baccharis pilularis* Shrubland Alliance), perennial rye grass fields, soft and western rush – sedge marshes (*Juncus [effuses, patens] – Carex [pansa, praegracilis]* Herbaceous Alliance), poison hemlock or fennel patches (*Conium maculatum – Foeniculum vulgare* Herbaceous Semi-Natural Alliance), Monterey cypress – Monterey pine woodland stands (*Hesperocyparis macrocarpa – Pinus radiata* Forest and Woodland Semi-Natural Alliance), eucalyptus – tree of heaven – black locust groves (*Eucalyptus* spp. – *Ailanthus altissima – Robinia pseudoacacia* Woodland Semi-Natural Alliance), and developed/disturbed areas (Figure 3.4-1). Habitats within and adjacent to the project area are described in more detail below:

- **Developed/Disturbed.** Developed/disturbed areas are generally characterized by residential or commercial development dominated by a mix of exotic ornamental and native plant species. This habitat type occurs on the south and west sides of the BSA and includes Wavecrest Road, the Smith Field Park recreational area, and the developed areas south of Wavecrest Road. These areas are characterized by commercial development, paved public roadways, and recreational facilities (including manicured sports fields, a dog park, and horseshoe pits). Vegetation types in these areas include manicured grass fields and ornamental trees and shrubs.
- **Coyote Brush Scrub.** Coyote brush scrub habitat occurs throughout the undeveloped portions of the BSA, primarily in the western and northeastern extents of the BSA. In the BSA, coyote brush (*Baccharis pilularis*) is the dominant species observed along with coastal sage brush (*Artemisia californica*), blueblossom (*Ceanothus thyrsiflorus*), beaked hazelnut (*Corylus cornuta*), sticky monkeyflower (*Diplacus aurantiacus*), California buckwheat (*Eriogonum fasciculatum*), lizard tail (*Eriophyllum staechadifolium*), California coffeeberry (*Frangula californica*), coast silk tassel (*Garrya elliptica*), salal (*Gaultheria shallon*), oceanspray (*Holodiscus discolor*), deerweed (*Acmispon glaber*), coastal bush lupine (*Lupinus arboreus*), California wax myrtle (*Morella californica*), California blackberry (*Rubus ursinus*), white sage (*Salvia apiana*), purple sage (*Salvia leucophylla*), and poison oak (*Toxicodendron diversilobum*). Emergent trees may be present at low cover, including Bishop pine (*Pinus muricata*), Douglas fir (*Pseudotsuga menziesii*), coast live oak (*Quercus agrifolia*), or California bay (*Umbellularia californica*). Coyote brush scrub habitat in the BSA has the potential to serve as upland dispersal habitat for California red-legged frog (CRLF) (*Rana draytonii*) and may support special-status plant species, including Choris's popcorn flower (*Plagiobothrys chorisianus* var. *chorisianus*) and perennial goldfields (*Lasthenia californica* ssp. *macrantha*). In addition, this community has the potential to support nesting and foraging birds protected under the Migratory Bird Treaty Act (MBTA).

³² SWCA Environmental Consultants (SWCA). 2023. *Final Biological Resources Evaluation for the Smith Field Project, Half Moon Bay, San Mateo County, California*. Prepared for City of Half Moon Bay. January.

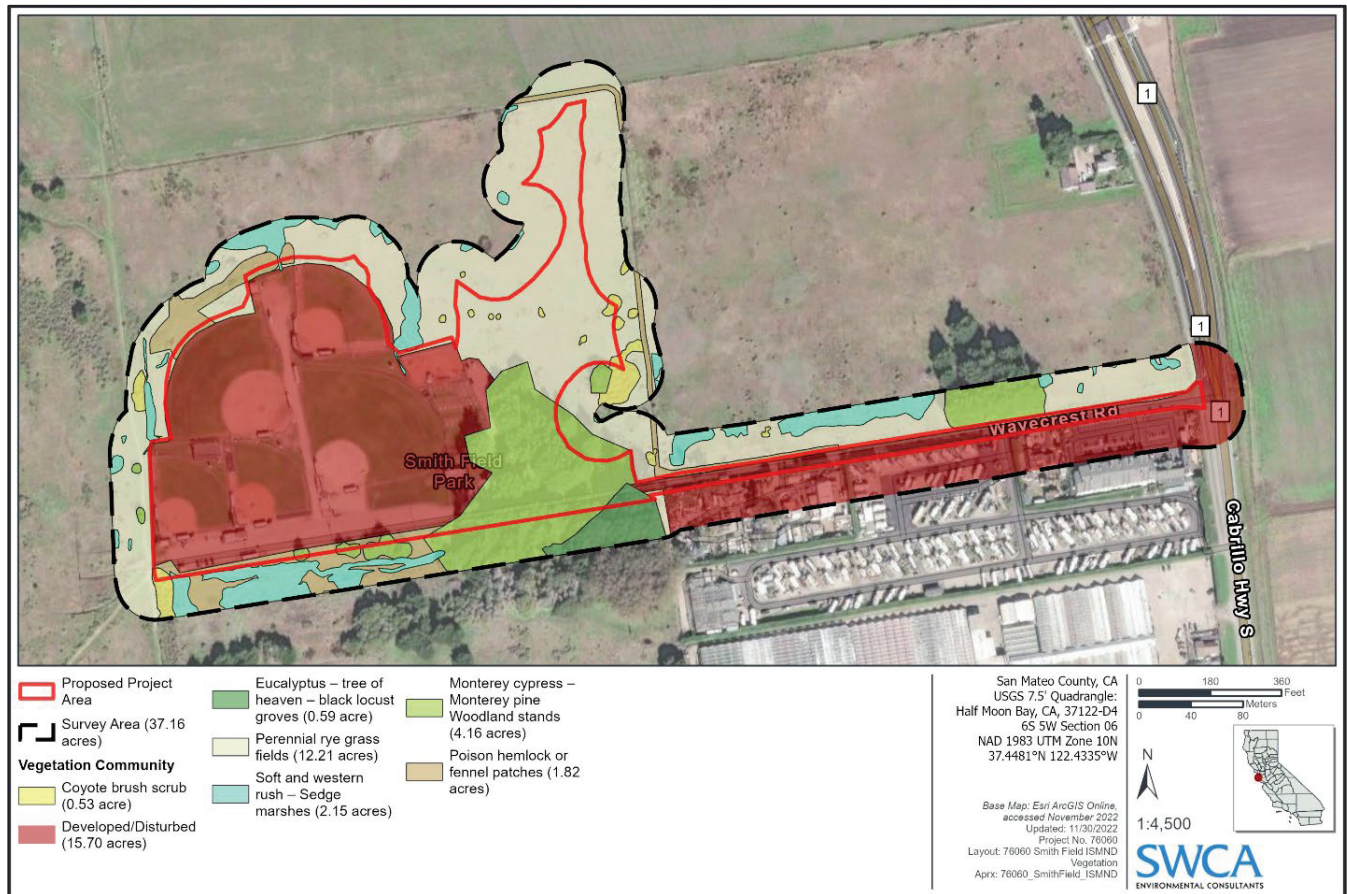


Figure 3.4-1. Vegetation communities map.

- **Perennial Rye Grass Fields.** Perennial rye grass fields occur primarily in the northeast portion of the BSA and is dominated by perennial rye grass, Harding grass (*Phalaris aquatica*), four seeded vetch (*Vicia tetrasperma*), and soft chess (*Bromus hordeaceus*). Elements of this vegetation community can also be found within the Wavecrest Watercourse. Perennial rye grass field habitat in the BSA has the potential to serve as upland dispersal habitat for CRLF and may support special-status plant species, including Choris's popcorn flower and perennial goldfields. In addition, this community has the potential to support nesting and foraging birds protected under the MBTA.
- **Soft and Western Rush – Sedge Marshes.** Soft and western rush – sedge marshes within the BSA occur as a mosaic of clonal, often monotypic patches of either field sedge (*Carex praegracilis*) or brown headed rush (*Juncus phaeocephalus*) with common rush (*Juncus patens*) present at low to moderate cover. Seasonal wetland features identified within the BSA were dominated by this habitat type. Emergent shrubs may be present at low cover, including coyote brush or California blackberry. Soft and western rush – sedge marshes in the BSA has the potential to serve as upland dispersal habitat for CRLF. In addition, this community has the potential to support nesting and foraging birds protected under the MBTA.
- **Poison Hemlock or Fennel Patches.** This vegetation community was observed in patches throughout the undeveloped portions of the BSA in locations that have been subjected to historical disturbances such as adjacent to stormwater ditches (including the Wavecrest Watercourse) or on raised remnant soil stockpiles. Within this portion of the BSA, poison hemlock (*Conium maculatum*) is co-dominant with upland plant species, including sweet fennel (*Foeniculum vulgare*), wild radish (*Raphanus raphanistrum*), and Bermuda buttercup (*Oxalis pes-caprae*). Poison hemlock or fennel patch habitat in the BSA has the potential to serve as upland dispersal habitat for CRLF. In addition, this community has the potential to support nesting and foraging birds protected under the MBTA.
- **Monterey Cypress – Monterey Pine Woodland Stands.** Monterey cypress – Monterey pine woodland stands in the BSA are dominated by Monterey cypress with Monterey pine at low cover. Within the BSA, this vegetation community occurs as ornamental or windrow plantings along Wavecrest Road. This community has the potential to support nesting and foraging birds protected under the MBTA and may provide marginal overwintering habitat for monarch butterfly.
- **Eucalyptus – Tree of Heaven – Black Locust Groves.** This habitat occurs in the southern portion of the BSA and is composed mostly of mature blue gum eucalyptus (*Eucalyptus globulus*) and blackwood acacia (*Acacia melanoxylon*) trees with a sparse understory dominated by poison oak and California blackberry. This community has the potential to support nesting and foraging birds protected under the MBTA and may provide marginal overwintering habitat for monarch butterfly.

Desktop review identified five special-status plant species and 11 special-status wildlife species within 5 miles of the survey area (see Appendix D for details of the desktop review). Two of the special-status plant species and one of the special-status wildlife species were determined to have a moderate to high potential to occur in the BSA:

- Choris's popcorn flower (*Plagiobothrys chorisianus* var. *chorisianus*): California Rare Plant Rank (CRPR) 1B.2 (high potential);
- Perennial goldfields: CRPR 1B.2 (moderate potential); and
- California red-legged frog: federally threatened, CDFW Species of Special Concern (SSC).

Choris's Popcorn Flower

Choris's popcorn flower is an annual herb in the borage family (Boraginaceae) that blooms from March to June. There are four California Natural Diversity Database (CNDDDB) records of Choris's popcorn flower within 2 miles of the BSA, one of which was documented in 2015, overlapping the southwestern corner of the BSA. Prior to the site visit, Choris's popcorn flower was determined to have a high potential to occur within or adjacent to the BSA due to the suitable mesic coastal scrub habitat. No Choris's popcorn flower was observed at the time of the November 2022 site assessment; however, the survey did not occur during the blooming period for this species. Vegetation communities within the BSA that could potentially support this species are limited to coyote brush scrub and perennial rye grass fields. Coyote brush scrub and perennial rye grass field vegetation communities are located within areas that are potentially within the work area; therefore, a preconstruction survey for this species, during the appropriate bloom period of March to June, is recommended. With implementation of Mitigation Measure BIO-2, including a preconstruction survey and special-status plant avoidance, impacts to Choris's popcorn flower would be less than significant with mitigation incorporated.

Perennial Goldfields

Perennial goldfields is a perennial herb in the daisy family (Asteraceae) that blooms from January to November, but mostly May to August. There is one CNDDDB record within 2 miles of the BSA, which was documented in 2015 at the bluff top of the California Coastal Trail near Francis State Beach, approximately 1.9 miles north of the project area. Prior to the site visit, perennial goldfields was determined to have a moderate potential to occur within the BSA due to suitable habitat present along the coastal trail located at the western edge of the BSA. No perennial goldfields occurrences were observed at the time of the November 2022 site assessment; however, the survey occurred at the end of the blooming period for this species. Vegetation communities within the BSA that could potentially support this species are limited to coyote brush scrub and perennial rye grass fields. Coyote brush scrub and perennial rye grass vegetation communities are located within areas that are potentially within the work area; therefore, a preconstruction survey for this species, during the appropriate bloom period of January to November, is recommended. With implementation of Mitigation Measure BIO-2, including a preconstruction survey and special-status plant avoidance, impacts to perennial goldfields would be less than significant with mitigation incorporated.

California Red-legged Frog

CRLF, a federally threatened species and CDFW SSC, occurs in various habitat types, depending on its life cycle stage. Breeding areas include aquatic habitats, such as lagoons, streams, and natural and human-made ponds. The species prefers aquatic habitats with little or no flow, the presence of surface water to at least early June, surface water depths to approximately 2 feet, and the presence of emergent vegetation (e.g., cattails, bulrush). During periods of wet weather, some individuals may make overland dispersals through adjacent upland habitats of distances up to 1 mile. Upland habitats, including small mammal burrows and woody debris, can also be used as refuge during the summer if water is scarce or unavailable.³³ CRLF typically travel between sites and are unaffected by topography and vegetation types during migration. Dispersal habitat makes it possible for CRLF to locate to new breeding and non-breeding sites and is crucial for conservation of the species.

Eight CRLF occurrences have been recorded within 2 miles of the BSA between 2001 and 2020. The closest CNDDDB occurrence (2004) was recorded within the northern portion of the BSA. While no suitable aquatic breeding habitat was observed on-site, potentially suitable upland dispersal habitat for

³³ Jennings, M.R., and M.P. Hayes. 1994. *Amphibian and Reptile Species of Concern in California*. Sacramento, California: California Department of Fish and Game.

this species is present within the BSA. Additionally, the Wavecrest Watercourse may provide marginally suitable aquatic dispersal habitat during periods of inundation during the wet season. This species was not observed in the BSA during the field survey.

Based on the above information and number of known occurrences within 2 miles of the project area and within the BSA, there is high potential for dispersing CRLF to occur in the BSA and project area during the wet season (October 15–May 31) and low to moderate potential for the species to occur in the BSA during the dry season (June 1–October 15). With implementation of Mitigation Measure BIO-3, including a preconstruction survey and biological monitoring, project impacts to CRLF would be less than significant with mitigation incorporated.

Other Species

In addition, the BRE determined that four special-status wildlife species have low potential to occur in the project area:

- Western bumble bee (*Bombus occidentalis*): California candidate endangered (low potential)
- Monarch butterfly (*Danaus plexippus*): federal candidate species (low potential)
- Saltmarsh common yellowthroat (*Geothlypis trichas sinuosa*): CDFW SSC (low potential)
- San Francisco garter snake (SFGS) (*Thamnophis sirtalis tetrataenia*): federally and State endangered, CDFW Fully Protected Species (low potential)

These species are expected to occur only as visitors, migrants, or transients and are not expected to reside, breed, occur in large numbers, or otherwise make substantial use of the project area. As a result, the project is expected to have a less-than-significant impact on these species.

Mitigation Measures

The project shall comply with the following mitigation measures:

- BIO-1** The following general biological mitigation measures shall be implemented during the project:
- a. Prior to the start of the project, all construction crew members shall attend an environmental awareness training presented by a qualified biologist. A training brochure describing special-status species, project avoidance and minimization measures, key contacts, and potential consequences of impacts to special-status species and potentially jurisdictional features shall be distributed to the crew members during the training. Trainees shall sign an environmental training attendance sheet.
 - b. A qualified biological monitor shall be present during all initial ground-disturbing activities, including grubbing and/or vegetation removal and installation of the wildlife exclusion fence.
 - c. Disturbance to vegetation shall be kept to the minimum necessary to complete the Project activities. To minimize impacts to vegetation, a qualified biologist shall work with the project Contractor to designate the work area and any staging areas and clearly delineate areas that shall be avoided with exclusion fencing (e.g., high-visibility orange construction fencing, silt fence, ERTEC fencing, or other similar material).

- d. If any animals are encountered during project activities, said animals shall be allowed to leave the work area unharmed. Animals shall not be picked up or moved in any way.
- e. During project activities, all trash that may attract predators such as wrappers, cans, bottles, and food scraps shall be disposed of in solid, closed containers (trash cans) and removed at the end of each working day from the entire construction site. Following construction, trash/construction debris shall be removed from work areas.
- f. No firearms shall be allowed on the project site, except for federal, State, or local law enforcement, or security guards. No pets shall be allowed on the project site during construction.
- g. Project-related vehicles shall observe a 15 mile-per-hour speed limit in all project areas, except on City of Half Moon Bay and County of San Mateo roads, and State highways.
- h. Nighttime construction shall be avoided.
- i. To prevent inadvertent entrapment of wildlife during construction, the qualified biologist and/or construction foreman/manager shall ensure that all excavated, steep-walled holes or trenches more than 1 foot deep are completely covered at the close of each working day by plywood or similar materials, or provided with one or more escape ramps constructed of earth fill or wooden planks and inspected by the qualified biologist. Before such holes or trenches are filled, they shall be thoroughly inspected for trapped animals by the qualified biologist and/or construction foreman/manager.
- j. All stockpiled soil shall be covered during periods of rain.
- k. The following best management practices (BMPs) shall be implemented to limit the inadvertent introduction of invasive species into sensitive habitats:
 - 1. All ground-disturbing equipment used adjacent to the riparian habitat shall be washed (including wheels, tracks, and undercarriages) at a legally operating equipment yard both before and after being used at the project site;
 - 2. All applicable construction materials used on-site, such as straw wattles, mulch, and fill material, shall be certified weed free; and
 - 3. All disturbed soils shall be stabilized and planted with a native seed mix from a local source following construction.

BIO-2

The following measures shall be implemented to minimize impacts to special status plants:

- a. Prior to the start of construction, a plant survey for perennial goldfields and Choris's popcorn flower shall be conducted during the appropriate blooming period. Perennial goldfields or Choris's popcorn flower occurrences within 50 feet of the project work areas shall be flagged for avoidance by the project. If the project cannot avoid impacts to this species, the City of Half Moon Bay shall consult with the California Department of Fish and Wildlife on appropriate measures and/or actions to protect or salvage the plant(s) prior to beginning construction.

- BIO-3** The following measures shall be implemented to minimize impacts to special-status amphibians:
- a. To avoid impacts to California red-legged frog and other sensitive wildlife species, a wildlife exclusion fence (silt fence, ERTEC fencing, or other similar material) shall be installed around the perimeter of the project, at the discretion of the qualified biological monitor.
 - b. A qualified biological monitor shall be present during all initial ground-disturbing activities, including grubbing and/or vegetation removal and installation of the wildlife exclusion fence.
 - c. The number of access routes, number and size of staging areas, and total area of the activity shall be limited to the minimum necessary to complete the Project, and their boundaries shall be clearly demarcated.
 - d. Construction activities (e.g., grubbing, grading) shall occur during the dry season (June 1–October 15) to facilitate avoidance of California red-legged frog.
 - e. During the dry season (June 1–October 15), the wildlife exclusion fence shall be inspected by a qualified biological monitor on a weekly basis to ensure that the fence is functioning as intended throughout the duration of construction activities. If work must occur during the wet season (October 15–May 31), a qualified biologist shall perform a preconstruction survey of all project areas (including staging areas) prior to construction activities on a daily basis to ensure that no California red-legged frog or other sensitive species are present and that no wildlife are stranded along the wildlife exclusion fencing.
 - f. To protect burrows that may provide refuge for protected animals such as the California red-legged frog, no soil or materials shall be stockpiled on the ground where burrows are present.
 - g. Construction materials, including but not limited to wooden pallets, best management practices (BMPs), equipment, or other materials, that are left on the ground for more than 24 hours shall be inspected before and during moving of the materials to prevent potential impacts to animals that may have used the materials as a temporary refuge. Plastic pipes, if used, shall be covered with material to prevent animals from entering the pipes.
 - h. Regardless of the season, construction shall adhere to State Water Resources Control Board and San Mateo Countywide Water Pollution Prevention Program (SMCWPPP) BMPs, and no construction shall occur during and within 24 hours following a significant rain event (defined as greater than 0.25 inch in a 24-hour period). Following a significant rain event and the 24-hour drying-out period, a qualified biologist shall conduct a preconstruction survey for California red-legged frog and other sensitive species prior to the restart of any project activities.

b. Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in the local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

The BRE completed by SWCA for the project identified the habitat within and immediately surrounding the project area as consisting of a mix of coyote brush scrub, developed or landscaped areas, perennial rye

grass fields, soft and western rush – sedge marshes, poison hemlock or fennel patches, Monterey cypress – Monterey pine woodland stands, and eucalyptus – tree of heaven – black locust groves.

The 2020 LCLUP has identified ESHAs, which are defined as “any area in which plant or animal life or their habitats are either rare or especially valuable because of their special nature or role in an ecosystem and which could be easily disturbed or degraded by human activities and developments.”³⁴ The 2020 LCLUP mapping identified one ESHA and two potential ESHAs in and adjacent to the project site:

- **ESHA:** Potential SFGS habitat and/or CRLF upland, foraging and dispersal habitat occurs in the expanded dog park and nature trail footprint and to the north, east, and south of the project area;
- **Potential ESHA:** Unique species habitat (raptor winter foraging area and short-eared owl [*Asio flammeus*] wintering site) occurs in the expanded off-leash dog park and nature trail footprint and to the north, east, and south of the project area; and
- **Potential ESHA:** General location of Choris’s popcorn flower populations as documented in CNDDDB exists to the east of the project site.

The proposed project area contains potential habitat associated with special-status or unique species, including CRLF and SFGS. The northeastern extent of the BSA is depicted in Figure 6-3 of the LCLUP as a mapped ESHA for CRLF upland, foraging, and dispersal habitat and SFGS habitat. As such, the project may result in impacts to this terrestrial ESHA. However, proposed work within the mapped terrestrial ESHA will be limited to installation of a pedestrian trail and fenced dog park within what is potential upland dispersal habitat for the species. The proposed development is not anticipated to create a barrier to CRLF or SFGS dispersal or significantly impact upland dispersal habitat, given the extent of undisturbed area surrounding the development area and location of the disturbance (i.e., not located directly between known breeding ponds and persistent water features where dispersal movements are concentrated). Furthermore, implementation of Mitigation Measures BIO-1 and BIO-2 will minimize impacts to the terrestrial ESHA. As a result, all impacts to this ESHA would be reduced to a less-than-significant level.

The LCLUP also identifies the habitat surrounding the existing Smith Field Park facilities, including the northeastern extent of the project site, as a Potential ESHA for Choris’s popcorn flower. Special-status plant species could be impacted during construction and operation by the inadvertent introduction of invasive plant species. Policy 6-66 of the LCLUP prohibits the introduction of invasive plant species in landscaping and Policy 6-67 encourages landowners to remove invasive species from their lands. BMP 6 includes measures to prevent the spread of invasive plants during construction, which would comply with the LCLUP and reduce impacts to this ESHA to a less-than significant level.

The LCLUP also identifies the habitat surrounding the existing Smith Field Park facilities, including the northeastern extent of the project site, as Potential ESHAs including raptor winter foraging and short-eared owl wintering areas. As such, the project may result in impacts to this terrestrial Potential ESHA. However, proposed work within the mapped terrestrial ESHA will be limited to installation of a pedestrian trail and fenced dog park within what is potential winter foraging habitat for raptors. The proposed development is not anticipated to significantly impact winter foraging habitat, given the extent of undisturbed area surrounding the development area and the location (i.e., adjacent to an active park). Furthermore, implementation of Mitigation Measure BIO-1 will minimize impacts to the terrestrial Potential ESHA. As a result, all impacts to this Potential ESHA would be reduced to a less-than-significant level.

³⁴ City of Half Moon Bay. 2020. *City of Half Moon Bay Local Coastal Land Use Plan 2020 Comprehensive Update*. October 20. Available at <https://www.half-moon-bay.ca.us/DocumentCenter/View/3784/Full-Combined-2020-HMB-LCLUP>. Accessed October 28, 2024.

Mitigation Measures

Implement Mitigation Measures BIO-1, BIO-2, and BIO-3.

c. *Would the project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?*

The preliminary jurisdictional delineation conducted by SWCA for the project on November 21 and 22, 2022, included the project site plus a 100-foot buffer. It did not identify any potentially jurisdictional drainages on the project site (see Appendix E); however, it did identify one drainage (Wavecrest Watercourse) and several wetlands in the vicinity of the project site.

The preliminary jurisdictional delineation identified a total of 2.17 acres of potentially jurisdictional single-parameter wetlands as defined by the California Coastal Commission (CCC) and 0.67 acres of other waters in the survey area. The single-parameter wetlands had a dominance of wetland plants and were located in widespread patches surrounding the project site. The project footprint has been designed to avoid all single-parameter wetlands.

The other waters (Wavecrest Watercourse) included:

- Approximately 0.13 acres of Section 404 and Section 401 waters situated below the ordinary high-water mark (OHWM) line of in the Wavecrest Watercourse on the northern edge of Wavecrest Road, which is outside the project area.
- Approximately 0.54 acres of Wavecrest Watercourse streambed above the OHWM would be under CDFW jurisdiction.

Wavecrest Watercourse is adjacent to the north side of Wavecrest Road.

Stormwater runoff from excavation, grading, and construction activities could impact water quality in Wavecrest Watercourse and single-parameter wetlands. Standard COAs for all CDPs in the city include all stormwater quality BMPs required by the San Mateo Countywide Water Pollution Prevention Program (SMCWPPP) (see Section 3.10, *Hydrology and Water Quality*). All construction activities would be required to implement BMPs to comply with the SMCWPPP and project Stormwater Pollution Prevention Plan (SWPPP), which would prevent sediment-laden runoff and/or pollutants from entering drainages and wetlands. In addition, Mitigation Measure BIO-4, which would require management of exposed soils and vehicle fueling and maintenance, would further reduce these impacts to less than significant.

The City's GIP requires that operational stormwater runoff designs implement "more resilient, sustainable stormwater management which reduces runoff volumes, disperses runoff to vegetated areas, harvests and uses runoff where feasible, promotes infiltration and evapotranspiration, and utilizes natural processes to detain and treat runoff."³⁵ Green infrastructure limits the discharge of pollutants to the storm drain system and promotes the infiltration of stormwater into the groundwater basin. Runoff from the project site drains north and west into open fields. Project operations would be required to comply with the City's GIP and would direct stormwater runoff from the park through vegetated channels and basins prior to flowing off-site or percolating into the ground. Therefore, compliance with the City's GIP and the SMCWPPP and implementation of BMPs and Mitigation Measure BIO-4 would reduce potential impacts related to construction and operational runoff into surrounding wetlands and waters to a less-than-significant level.

³⁵ City of Half Moon Bay. 2019. *City of Half Moon Bay Green Infrastructure Plan*, pg. 87. September. Available at: <https://www.half-moon-bay.ca.us/DocumentCenter/View/2305/HalfMoonBayGIPlan09-2019Final1>. Accessed December 5, 2024.

Mitigation Measures

BIO-4 The following measures shall be implemented to minimize impacts to Wavecrest Watercourse and other drainages in the vicinity of the project:

- a. All spoils, such as dirt, excavated material, debris, and construction-related materials, generated during project activities shall be placed where they cannot enter the drainage ditch, culvert inlet, or nearby vernal marshes. Spoils shall be covered or secured to prevent sediment from escaping. Once the spoil pile is no longer active, it shall be removed from the work area and disposed of lawfully at an appropriate facility.
- b. All exposed soils in the work area resulting from project activities shall be stabilized immediately following the completion of work to prevent erosion. Erosion and sediment control best management practices (BMPs), such as silt fences, straw hay bales, gravel or rock-lined drainages, water check bars, and broadcast straw, can be used. BMPs shall be made of certified weed-free materials. Straw wattles, if used, shall be made of biodegradable fabric (e.g., burlap) and free of monofilament netting. At no time shall silt-laden runoff be allowed to enter any drainages or other sensitive areas.
- c. All fueling and maintenance of vehicles and other equipment and staging areas shall occur at least 100 feet from any drainages and other water features. Crew members shall ensure that contamination of habitat does not occur during such operations. Prior to the onset of work, the construction contractor shall prepare a plan to be approved by the City of Half Moon Bay before construction begins to allow a prompt and effective response to any accidental spills. All workers shall be informed of the importance of preventing spills and the appropriate measures to take should a spill occur.
- d. Before completion of the project, all exposed or disturbed surfaces shall be permanently protected from erosion with reseeded and landscaping.

d. Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Suitable migration habitat for amphibians, reptiles, birds, and mammals are present along the Pacific Ocean coastline to the west of the BSA, and large collections of migrating raptors are known to use the Wavecrest Open Space, adjacent to the project area, during the fall. However, there are no known migratory corridors that intersect the BSA. Although the BSA does contain upland dispersal habitat for CRLF, SFGS, and common wildlife species, the proposed project will not include the construction of structures that would inhibit the dispersal of these species when attempting to move through the BSA. Furthermore, the temporary and short duration of construction activities are unlikely to substantially disrupt the migration of animals through the coastline to the west of the BSA. The project is not expected to interfere substantially with the movement of any native resident or migratory animals; therefore, impacts to migratory corridors would be less than significant.

Under the 2020 LCLUP ruderal areas may contain foraging habitat for migratory birds and raptor species.³⁶ Migratory birds and raptors are protected while nesting by the MBTA and California Fish and Game Code. Project construction would be short term, lasting approximately 6 months in Phase 1. Should nesting birds be identified, they would be protected by measures for nesting birds under Mitigation Measure BIO-5. Therefore, Mitigation Measure BIO-5 would mitigate potentially significant impacts to nesting birds to a less-than-significant level.

The project site contains suitable nesting and foraging habitat for avian species protected under the MBTA and California Fish and Game Code Sections 3511 and 3513. Suitable nesting and foraging habitats would include the non-native grassland areas, shrubs, and trees within and adjacent to the project area. Although no active nesting was observed during the BRE field survey due to the timing of the survey, avian species protected by the MBTA and California Fish and Game Code observed in the project area during the BRE field survey included American crow (*Corvus brachyrhynchos*), American kestrel (*Falco sparverius*), black phoebe (*Sayornis nigricans*), Brewer's blackbird (*Euphagus cyanocephalus*), common raven (*Corvus corax*), European starling (*Sturnus vulgaris*), house finch (*Haemorhous mexicanus*), house wren (*Troglodytes aedon*), killdeer (*Charadrius vociferus*), red-shouldered hawk (*Buteo lineatus*), red-tailed hawk (*Buteo jamaicensis*), savannah sparrow (*Passerculus sandwichensis*), song sparrow (*Melospiza melodia*), and turkey vulture (*Cathartes aura*). The project has the potential to impact potential eggs or young of avian species covered under the MBTA and California Fish and Game Code. While potential nesting sites for migratory birds could be removed through removal of trees and vegetative ground cover on the project site, hundreds of acres of suitable nesting and foraging habitat are present near the project and would remain undisturbed by project activities. Furthermore, the project would plant approximately 90 new 24-inch and 36-inch box trees throughout the park to satisfy the removal of heritage trees. Therefore, suitable nesting habitat would remain within and in the vicinity of the project. If work occurs during avian nesting season, implementation of Mitigation Measure BIO-5, which requires nesting bird surveys and construction modifications if active nests are identified, would ensure that impacts to nesting birds would be less than significant.

Mitigation Measures

BIO-5 The following measures shall be implemented to minimize impacts to nesting birds, as required by the Migratory Bird Treaty Act and California Fish and Game Code:

- a. If project activities, including grass mowing and tree trimming/removal, are conducted during nesting bird season (February 15–September 15), preconstruction nest surveys shall be conducted in and near the project area (within 250 feet for large raptors and 100 feet for all other birds) by a qualified biologist within 7 days of the start of construction. If nesting birds are identified during the preconstruction survey, then the project shall be modified (i.e., a no-work exclusion buffer of appropriate size [to be determined by the qualified project biologist] shall be erected around active nests) and/or delayed as necessary to avoid impacts to the identified nests, eggs, and/or young.

³⁶ City of Half Moon Bay. 2020. *City of Half Moon Bay Local Coastal Land Use Plan 2020 Comprehensive Update*. October 20. Available at: <https://www.half-moon-bay.ca.us/DocumentCenter/View/3784/Full-Combined-2020-HMB-LCLUP>. Accessed December 4, 2024.

e. Would the project conflict with any local policies or ordinances protecting biological resources, such as tree preservation policy or ordinance?

This analysis is based on the following documents:

- *Smith Field Parking Lot Project, Design Drawings*, Freyer & Laureta, Inc. (2024) (Appendix A)
- *Tree Inventory and Level 1 Arborist Assessment Results Memorandum for the Smith Field Project*, Erich Schickenberg, Arborist, SWCA (2023) (Appendix B)

The project would have a significant impact if it would conflict with the City's Heritage Tree Ordinance under Chapter 7.40 of the City's Municipal Code³⁷ or the City's Coastal Resource Conservation Standards under Chapter 18.38 of the City's Municipal Code.³⁸ Section 7.40.020 of the Heritage Tree Ordinance defines heritage trees as:

- A. A tree located on public or private property, exclusive of eucalyptus, with a trunk diameter of 12 inches or more, or a circumference of at least 38 inches measured at 48 inches above ground level.
- B. A tree or stand of trees so designated by resolution of the city council based on its finding of special historical, environmental or aesthetic value, including a resolution adopted under former Chapter 12.16.

To comply with Section 7.40.020 of the Heritage Tree Ordinance, the applicants conducted a tree survey by a certified arborist (see Appendix B). The 28.4-acre survey area included 231 existing trees. Of these, 138 specimens meet the definition of "heritage trees" per Section 7.40.020 of the City's Municipal Code.

The project would remove 33 trees, of which 25 are heritage trees. Of the heritage trees to be removed, 24 are Monterey cypress, which range in size from 13.3 to 133.8 inches dbh, and one is a Monterey pine, which is 23.2 inches dbh. The remaining heritage trees would be protected during construction.

Per the City's Municipal Code, heritage trees shall be replaced "on a one-for-one basis with a minimum size twenty-four-inch box specimen tree" (Section 7.40.060). The current Landscape Site Plan and Schematic Planting Plan (see Appendix A) proposes approximately eighty 24-inch box trees and ten 36-inch box trees to be installed throughout the new park facilities, a ratio of nearly 3.5:1 for the replacement of the 25 heritage trees. Proposed replacement species may include Monterey cypress, mayten, and/or strawberry trees, though final species and locations are still to be determined.

Per the City's Municipal Code, the City or project Contractor would be required to submit a tree protection plan for any grading, excavation, demolition, or construction activity in the vicinity of heritage trees prior to project approval. The City Manager may impose conditions on the City permit to assure protection of heritage trees during construction (Section 7.40.030). Compliance with City Municipal Code Section 7.40 would ensure that impacts to heritage trees would be less than significant.

³⁷ City of Half Moon Bay. 2019. *Half Moon Bay Municipal Code, Chapter 7.40: Heritage Trees*. Available at: <https://www.codepublishing.com/CA/HalfMoonBay/html/HalfMoonBay07/HalfMoonBay0740.html>. Accessed April 9, 2024.

³⁸ City of Half Moon Bay. 2019. *Half Moon Bay Municipal Code, Chapter 18.38: Coastal Resource Conservation Standards*. Available at: <https://www.codepublishing.com/CA/HalfMoonBay/html/HalfMoonBay18/HalfMoonBay1838.html#18.38>. Accessed April 9, 2024.

f. Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

There are no Habitat Conservation Plans or Natural Community Conservation Plans that apply to the project; therefore, no impact would occur.

3.5 Cultural Resources

Environmental Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<i>Would the project:</i>				
(a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	☐	☐	☐	☒
(b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☒	☐	☐
(c) Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☒	☐	☐

Environmental Evaluation

The analysis of cultural resources is based on the following document prepared for the project:

- *Cultural Resource Technical Report for the Smith Field Park Improvements Project, Half Moon Bay, California, SWCA (March 2023)*

a. Would the project cause a substantial adverse change in significance of a historical resource as defined in State CEQA Guidelines §15064.5?

A significant impact would occur if the project were to impact a historical resource defined as (1) a resource listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources (CRHR); (2) a resource included in a local register of historical resources, as defined in PRC Section 5020.1(k); or (3) any object, building, structure, site, area, place, record, or manuscript a lead agency determines to be historically significant.³⁹

Smith Field Park and the project area contain remaining buildings and radar cradles associated with former Half Moon Bay Radar Station L-82, a WWII-era early coastal defense military installation that operated between 1942 and 1951. The project site contains three buildings and two structures associated with the former radar station. An operations building and two adjacent concrete radar equipment cradles (without antennae) are located on the north side of Wavecrest Road, to the immediate west of a dirt road that runs north from Wavecrest Road to access the horseshoe pits and dog park. The former powerhouse building is located opposite the dirt road from the operations building, just northwest of the entrance to the park. The third building, potentially used in relation to VHF direction finding within the former radar

³⁹ 14 CCR Section 15064.5. September 17, 2021. Available at: <https://casetext.com/regulation/california-code-of-regulations/title-14-natural-resources/division-6-resources-agency/chapter-3-guidelines-for-implementation-of-the-california-environmental-quality-act/article-5-preliminary-review-of-projects-and-conduct-of-initial-study/section-150645-determining-the-significance-of-impacts-to-archaeological-and-historical-resources>. Accessed December 4, 2024.

station site, is located along the opposite south side of Wavecrest Road, to the southeast of the powerhouse and operations buildings. In addition, there are the remains of two concrete radar equipment cradles. The radar station buildings and equipment will not be altered as part of the project.

The building housing Cameron's Pub and Inn was built in 1931 and is associated with the Half Moon Bay Radar Station L-82 because it provided basic support functions and temporary wartime occupancy by the military. This property is not located within the project boundary and is not proposed to be altered as part of the project; however, it is approximately 150 feet southeast of the water line replacement area.

In 2000 the U.S. Army Corps of Engineers published *California Historic Military Buildings and Structures Inventory*, a four-volume series providing thematic contexts for military property types and recommended registration requirements when considering potential eligibility for the National Register of Historic Places (NRHP). Regarding coastal defense sites, although dozens of WWII-era gun batteries have been listed, only one radar station (Klamath Radar Station [B-71]) has been found eligible for listing in the NRHP.

To satisfy the requirements for historical resources under CEQA, both former Half Moon Bay Radar Station L-82 and Smith Field Park were documented and evaluated for potential historical significance using the criteria for the CRHR, as well as for eligibility for the Half Moon Bay Historic Resource Inventory (HRI).

Under CRHR Criterion 1, the radar station is associated with the significant pattern of military coastal defense development during WWII, although it did not participate in any notable events. Under CRHR Criterion 3, the Half Moon Bay Radar Station L-82 property appears to be a rare example of a WWII-era coastal defense radar station. While Half Moon Bay Radar Station L-82 appears to have historical significance under CRHR Criteria 1 and 3 for its associations with WWII-era coastal defense programs and radar station property types, the extensive alterations that have occurred at and surrounding the property have resulted in the loss of nearly all aspects of historical integrity. Due to the lack of historical integrity, Half Moon Bay Radar Station L-82 does not appear to be eligible for listing in the NRHP or CRHR. These alterations and loss of integrity have also affected the property's ability to reflect or exemplify significant patterns, periods, or property types related to Half Moon Bay. As such, the property does not appear to qualify as eligible for listing in the Half Moon Bay HRI. Therefore, the potential Half Moon Bay Radar Station L-82 Historic District does not qualify as a historical resource for the purposes of environmental review under CEQA.

Therefore, there are no resources that qualify as a historical resource pursuant to CEQA, the project would not result in significant adverse impacts to historical resources, and no impact would occur.

b. Would the project cause a substantial adverse change in significance of an archaeological resource pursuant to State CEQA Guidelines §15064.5?

A significant adverse effect would occur if grading or excavation activities associated with a project were to disturb previously unknown archaeological resources. The Wavecrest Watercourse/Seymour Ditch is mapped as archaeologically sensitive on the 2020 LCLUP Archaeological Sensitivity Areas Map; however, the project site is not.⁴⁰ The records search conducted by the Northwest Information Center indicated that there are no previously recorded archaeological resources within the project area. Native American outreach did not reveal any known Native American cultural sites, but suggested that the

⁴⁰ City of Half Moon Bay. 2020. *City of Half Moon Bay Local Coastal Land Use Plan 2020 Comprehensive Update, Chapter 8: Cultural Resources; Figure 8-1: Archaeological Sensitivity Areas*. October 20. Available at: <https://www.half-moon-bay.ca.us/DocumentCenter/View/3784/Full-Combined-2020-HMB-LCLUP>. Accessed December 6, 2024.

project site is in an area known for prehistoric materials. SWCA did not identify any prehistoric or historic archaeological resources during the archeological field survey.

In the event of an accidental discovery, the project Contractor would implement the City's Standard Condition for discovery. Prior to the initiation of project activities, an environmental awareness training will be presented by a qualified archaeologist (Mitigation Measure CUL-1). The training will detail the types of cultural resources that may be encountered, as well as procedures to occur in the event of accidental discovery.

City of Half Moon Bay Standard Condition: If subsurface historic or archaeological resources are uncovered during construction, all work shall stop, the applicant shall notify the Community Development Director and retain a qualified archaeologist to perform an archaeological reconnaissance and identify any mitigation measures required to protect archaeological resources. Subsurface investigation shall not resume until expressly authorized by the Director.

Potential impacts to archaeological resources would be considered less than significant with the implementation of the standard condition. Implementation of Mitigation Measure CUL-1 would further reduce this less-than-significant impact.

Mitigation Measures

The following measure is provided to avoid and/or reduce impacts to a less-than-significant level in the event previously undiscovered or subsurface resources are encountered during project implementation.

CUL-1 Prior to the start of the project, all construction crew members will attend an environmental awareness training. This environmental awareness training will be conducted by a qualified archaeologist and will address cultural situations that may be encountered. An archaeologist will prepare an archaeological brochure to be distributed to the construction crew at the on-site environmental awareness training. The brochure will identify the types of cultural resources that may be encountered and the procedures to be followed in the event of accidental discovery.

c. Would the project disturb any human remains, including those interred outside of formal cemeteries?

A significant adverse effect would occur if grading or excavation activities associated with a project were to disturb previously interred human remains.

The disposition of burials falls first under the general prohibition on disturbing or removing human remains under California Health and Safety Code Section 7050.5. More specifically, remains suspected to be Native American are treated under State CEQA Guidelines Section 15064.5, and PRC Section 5097.98 illustrates the process to be followed in the event that remains are discovered. If human remains are discovered during construction, no further disturbance to the site shall occur, and the County of San Mateo (County) Coroner must be notified (CCR 15064.5 and PRC 5097.98).

The records search conducted for the project did not reveal any known Native American burial sites. The absence of Native American sacred places does not preclude their existence at the subsurface level. Project activities include grading and limited excavation to install the new utilities and road and slab foundations for new structures. Therefore, subsurface deposits related to this resource may be encountered during ground-disturbing activities. Environmental impacts may result from project discovery of unrecorded human remains during grading and excavation. Although not anticipated, it is

possible that discoveries of human remains may occur during ground-disturbing activities associated with project construction. Disturbance of unanticipated human remains would be a potentially significant impact. In the event that previously undiscovered human remains are encountered during the project, the project would be required to implement the following standard City COA that is applicable to all CDPs:

City of Half Moon Bay Standard Condition: Pursuant to Section 7050.5 of the Health and Safety Code and Section 5097.94 of the Public Resources Code, in the event of the discovery of human remains during construction, there shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains. The County Coroner shall be notified and shall make a determination as to whether the remains are Native American. If the Coroner determines that the remains are not subject to his authority, he shall notify the California Native American Heritage Commission who shall attempt to identify descendants of the deceased Native American(s). If no satisfactory agreement can be reached as to the disposition of the remains pursuant to this State law, then the permittee shall reinter the human remains, and items associated with Native American burials on the property in a location not subject to further subsurface disturbance.

Potential impacts to human remains would be considered less than significant with the implementation of the standard COA. Implementation of Mitigation Measure CUL-1 would further reduce this less-than-significant impact.

3.6 Energy

Environmental Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<i>Would the project:</i>				
(a) Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☒	☐
(b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☐	☒

Environmental Evaluation

a. Would the project result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Energy use during project construction would be short term and temporary. Construction of the project would require the use of construction equipment and worker vehicles that would use energy. There are no established thresholds of significance for construction-related energy use; therefore, energy use during construction activities was not estimated. As discussed in Section 3.8, *Greenhouse Gas Emissions*, the project includes BMPs, as required by the BAAQMD, to reduce construction-related GHG emissions, which would also improve energy efficiency. In addition, as identified under Section 3.19, *Utilities and Service Systems*, the project will include a Waste Management Plan to recycle at least 65% of all

construction waste or demolition material.^{41,42} Recycling construction waste would reduce the amount of energy used in the production of new materials.

Due to the relatively small scale and short duration of construction activities and the implementation of measures to reduce GHG emissions and recycle construction debris, construction of the project would not result in the wasteful, inefficient, or unnecessary consumption of energy resources, and construction impacts would be less than significant.

The project would upgrade facilities at an existing park. Energy would be used by lighting, the new concession and restrooms, and the irrigation system. The existing lighting system for Field 3 nighttime use would be replaced with more energy-efficient lighting. The existing lighting system includes 34 fixtures with a total electrical load of 57.12 kilowatts (kW). The new system would include 47 energy-efficient fixtures with a total electrical load of 49.44 kW, for a reduction of 7.68 kW. New concession and restroom buildings would be all-electric and meet all requirements of the 2022 California Energy Code, as required by the Half Moon Bay Municipal Code.⁴³

The project would implement improvements to the existing Smith Field Park, including removing the horseshoe pits (which would likely be placed closer to town at Johnston House or the Train Station), enlarging the dog park, and adding a playground, picnic and barbeque areas, and nature path. Other park facilities would retain essentially the same size and usage. Therefore, the number of park users is unlikely to change appreciably, and vehicle miles traveled (VMT) and vehicle emissions would remain essentially the same. Therefore, project operations would not be likely to use energy wastefully or inefficiently, and this impact would be less than significant.

b. Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

The project includes upgrades to facilities at an existing park, resulting in more energy-efficient buildings and lighting. The new park facilities would meet all requirements of Title 24, including the California Green Building Standards Code (CALGreen). The project would not appreciably change traffic at the park. Energy use during project construction would be short term and temporary. Therefore, the project would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency, and no impact would occur.

⁴¹ County of San Mateo. 2024. Construction and Demolition. County of San Mateo Office of Sustainability. Available at: <https://www.smc sustainability.org/waste-reduction/construction-demolition/>. Accessed December 6, 2024.

⁴² California Department of Resources Recycling and Recovery (CalRecycle). 2024. Construction and Demolition (C&D) Diversion Informational Guide. Available at: <https://calrecycle.ca.gov/LGCentral/Library/CandDModel/>. Accessed February 6, 2024.

⁴³ City of Half Moon Bay. 2024. Half Moon Bay Municipal Code Section 14.04. Available at: <https://www.codepublishing.com/CA/HalfMoonBay/#1/HalfMoonBay14/HalfMoonBay1406.html#14.06>. Accessed December 6, 2024.

3.7 Geology and Soils

Environmental Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<i>Would the project:</i>				
(a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
(i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☐	☒
(ii) Strong seismic ground shaking?	☐	☐	☒	☐
(iii) Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
(iv) Landslides?	☐	☐	☐	☒
(b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
(c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☒	☐
(d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐
(e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	☒
(f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐

Environmental Evaluation

This section describes the potential impacts to the geology and soils of the project site with development of the proposed project. Potential effects are evaluated relative to important geologic features and the existing geology of the landscape. Impacts on the geology and soils of a site are usually addressed through an evaluation of the project-related subsurface changes to the existing environment and the modifications that would alter the stability of the geologic or soil conditions.

a. Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

The project site is located in a seismically active region. Moderate to strong earthquakes can occur on numerous local faults. Surface rupture is defined as surface displacement, which occurs along the surface trace of the causative fault during an earthquake. The project site is approximately 4.3 miles from the nearest active fault, the San Gregorio-Seal Cove Fault Zone, and 5.8 miles from the San Andreas Fault Zone.⁴⁴ No known active faults cross the project site, and the project site is not located within a currently designated Alquist-Priolo Earthquake Fault Zone.⁴⁵ Based on these considerations, the potential for surface rupture at the project site is considered low. The design and construction of the project is required to comply with the building codes related to seismic risk such as the California Building Code (CBC) and Half Moon Bay Municipal Code, which incorporates the International Building Code. Compliance with current requirements of these codes would minimize the potential to expose people or structures to substantial risk or loss or injury. Therefore, no impact related to rupture of a known earthquake fault would occur.

ii. Strong seismic ground shaking?

The project site is located in a seismically active region that has experienced generally moderate to high levels of shaking during past earthquakes. The project site is in relatively close proximity to two active faults (4.3 miles to the San Gregorio-Seal Cove Fault and 5.8 miles to the San Andreas Fault Zone), which means it would likely experience similar moderate to occasionally high ground shaking from future earthquakes.

The project sponsors would be required to submit a soils report in order to obtain a building permit from the City's Community Development Department, which would ensure that project plans and specifications for the concessions stand and restroom buildings would comply with the CBC and local amendments to the code, where applicable. Among many seismic requirements, the CBC requires foundations and structures to be designed and constructed to withstand the ground motions (i.e., peak ground accelerations [g]) that have a 10% chance of being exceeded in 50 years (equivalent to a 1/475 annual chance of being exceeded). The project area is estimated to have a 10% probability of exceeding a 0.48 g in 50 years, which is an intensity that would present severe perceived shaking and has the potential to cause moderate to heavy structural damage.⁴⁶

While it is not possible to totally preclude damage to structures during major earthquakes, strict adherence to good engineering design and construction practices will help reduce the risk of damage. The 2022 CBC defines the minimum standards of good engineering practice. The project would upgrade facilities at an

⁴⁴ California Geological Survey (CGS). 2021. State of California Special Studies Zones, Half Moon Bay Quadrangle. California Department of Conservation Division of Mines and Geology. Available at: <https://maps.conservation.ca.gov/cgs/informationwarehouse/eqzapp/>. Accessed December 6, 2024.

⁴⁵ California Geological Survey (CGS). 2021. State of California Special Studies Zones, Half Moon Bay Quadrangle. California Department of Conservation Division of Mines and Geology. Available at: <https://maps.conservation.ca.gov/cgs/informationwarehouse/eqzapp/>. Accessed December 6, 2024.

⁴⁶ U.S. Geological Service (USGS). 2024. Earthquake Hazards Program. Unified Hazard Tool. Available at: <https://earthquake.usgs.gov/hazards/interactive/>. Accessed December 6, 2024.

existing park, including a concession stand and restrooms, which are non-residential structures. The project would not create the potential for or exacerbate existing conditions related to seismic ground shaking over existing conditions. Compliance with the 2022 CBC would ensure the project does not directly or indirectly cause substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking, and this impact would be less than significant.

iii. Seismic-related ground failure, including liquefaction?

The project site is located in a Liquefaction Zone.⁴⁷ The project site is generally underlain by Watsonville loam (WmA) and clay deposits.⁴⁸ The presence of single-parameter wetlands, discussed in Section 3.4, *Biological Resources*, scattered throughout the field surrounding the existing park facilities, suggests the depth to groundwater is shallow, which would potentially contribute to liquefaction in the event of an earthquake.

The 2022 CBC and standard geotechnical engineering practice require identification of seismic design parameters to inform all earthwork requirements, foundation designs, and concrete/building material specifications. Design and construction of the project in accordance with the CBC would be sufficient to ensure public exposure to risks related to seismic-induced ground failure would remain minimal. Therefore, this impact would be less than significant.

iv. Landslides?

The project site is essentially flat and has no landslide potential; therefore, no impact would occur.

b. Would the project result in substantial soil erosion or the loss of topsoil?

A significant impact would occur if a project would expose large areas to the erosional effects of wind or water. The project site is essentially flat, sloping gently to the north and west, has a low erosion risk, and is moderately resistant to dust propagation.^{49,50}

Since the majority of the project work area is essentially flat, clearing, excavation, and grading activities at the project site are unlikely to result in significant short-term erosion impacts. Project grading, utility trenching, and construction would disturb approximately 16 acres of land over all phases. Construction would excavate approximately 1,352 CY of soil and require approximately 31,294 CY of fill. Approximately 29,942 CY of fill would need to be imported to meet the total fill requirement.

The project would be required to implement a County-approved Erosion and Sediment Control Plan (ESCP) and SWPPP, per the requirements of the San Francisco Bay Regional Water Quality Control Board (RWQCB) Municipal Regional Stormwater National Pollution Discharge Elimination System (NPDES) Permit and the SMCWPPP.⁵¹ These plans would include construction-related pollution prevention measures and BMPs to control erosion and sedimentation impacts and stabilize disturbed bare-

⁴⁷ U.S. Geological Service (USGS). 2024. Earthquake Hazards Program Unified Hazard Tool. Available at: <https://earthquake.usgs.gov/hazards/interactive/>. Accessed December 6, 2024.

⁴⁸ Natural Resources Conservation Service (NRCS). 2024. Web Soil Survey. Available at: <https://websoilsurvey.nrcs.usda.gov/app/WebSoilSurvey.aspx>. Accessed December 6, 2024.

⁴⁹ City of Half Moon Bay. 2014. *Plan Half Moon Bay. Existing Conditions, Trends and Opportunities Assessment Report*. Figure 5-10, Erosion Risk. Available at: <https://www.half-moon-bay.ca.us/155/General-Plan>. Accessed December 6, 2024.

⁵⁰ Natural Resources Conservation Service (NRCS). 2024. Web Soil Survey. Available at: <https://websoilsurvey.nrcs.usda.gov/app/WebSoilSurvey.aspx>. Accessed December 6, 2024.

⁵¹ County of San Mateo. 2023. Erosion and Sediment Control Plan Requirements. Available at: <https://www.smcgov.org/planning/erosion-and-sediment-control-plan-requirements>. Accessed December 9, 2024.

earth areas. Project construction would comply with the SMCWPPP, which would include BMPs to prevent stormwater erosion from leaving the project site. BMPs would include, but not be limited to, fiber rolls, silt fences, and sedimentation basins designed to capture stormwater runoff (see Appendix A). Section 3.7, *Hydrology and Water Quality*, provides additional information about ESCP, SWPPP, and Municipal Regional Stormwater NPDES requirements and related permits.

Areas of the project site disturbed by grading during construction would be protected against erosion during rainfall events. The bare portions of cut and fill slopes would be planted with deep-rooted, fast-growing vegetation before winter and the rainy season. The finished surface would be covered with appropriate erosion matting, hydro-seeded, or another BMP to prevent silt from entering storm drains during and after construction.

As required by the San Francisco RWQCB and the SMCWPPP, the project would implement BMPs to reduce erosion during construction. Since the total area of disturbance is more than 1 acre (approximately 4.7 acres in Phase 1 and a total of 16 acres over all phases plus the disturbance of Wavecrest Road for the water line installation), the City would be required to implement a SWPPP, according to the requirements of the San Francisco Bay RWQCB Municipal Regional Stormwater NPDES Permit and the SMCWPPP. The SWPPP would include BMPs to control erosion and sedimentation impacts and stabilize disturbed bare earth areas. Any bare earth areas would be reseeded prior to the end of construction. Section 3.10, *Hydrology and Water Quality*, provides additional information about the SWPPP and Municipal Regional Stormwater NPDES Permit requirements and related permits.

The addition of approximately 83,977 square feet (1.93 acres) of new impervious surface area to Smith Field Park could increase the stormwater runoff volume and rate compared with existing conditions, which could in turn accelerate soil erosion and loss of topsoil if stormwater were conveyed overland into neighboring open space areas and drainages. The City's GIP requires construction projects to prioritize green infrastructure to capture stormwater. Permanent green infrastructure is anticipated to implement a system of stormwater drains and bioretention areas and basins adequate to contain a 10-year, 2-hour storm and meet the requirements of the GIP. Overflow would drain into the vacant field to the north.⁵² All disturbed areas would be reseeded and/or planted prior to the end of construction. The new drainages would be adequate to handle the additional volume of stormwater from the estimated 3.2 acres of new impervious surface area. Therefore, impacts resulting from water-related erosion would be less than significant.

The project would remove the existing stormwater drainage system, including piping and sump pumps. These would be replaced with a system of stormwater drains and bioretention areas and basins adequate to contain a 10-year, 2-hour storm. Overflow would drain into the vacant field to the north.

The project would result in a net increase of approximately 83,977 square feet (1.9 acres) of new impervious surface area, which includes the paved drive and parking lot, plazas and picnic areas, paved walkways, and rooftops (see Appendix A). The project would be required to comply with the City's GIP⁵³ to control runoff. Permanent green infrastructure would be implemented as bioretention basins and planters that would filter contaminants from stormwater runoff before directing stormwater to the open space areas surrounding the park. Therefore, operational stormwater would not result in substantial soil erosion or the loss of topsoil, and this impact would be less than significant.

⁵² City of Half Moon Bay. 2019. *City of Half Moon Bay Green Infrastructure Plan*. September. Available at: <https://www.half-moon-bay.ca.us/DocumentCenter/View/2305/HalfMoonBayGIPlan09-2019Final1>. Accessed December 9, 2024.

⁵³ City of Half Moon Bay. 2019. *City of Half Moon Bay Green Infrastructure Plan*. September. Available at: <https://www.half-moon-bay.ca.us/DocumentCenter/View/2305/HalfMoonBayGIPlan09-2019Final1>. Accessed December 9, 2024.

c. Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?

The work area of the project site is essentially flat, with slopes between 0% and 5%, and has no potential for landslide. The project site has low liquefaction potential and may have potential for lateral spreading although that has not been mapped.⁵⁴ All new roads and structures would meet the requirements of the CBC and be engineered to meet requirements for seismic and geotechnical stability. The project would replace and upgrade existing park structures and would not include structures for human habitation. Therefore, this impact would be less than significant.

d. Would the project be located on expansive soil, as defined in Table 18.1 B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

According to the Natural Resources Conservation Service (NRCS), Watsonville loam is moderately to highly expansive in nature. Soil expansion and shrink-swell is typically addressed through preparation of site-specific soil engineering reports and compliance with the Uniform Building Code.^{55,56}

A detailed soils report would be required for the concession stand and restroom buildings to determine the potential for expansive soils prior to the issuance of permits. Impacts would be determined and mitigated, if necessary, by the soils report. Therefore, this impact would be less than significant.

e. Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

The project would be served by the City's sewer system and effluent would be treated at the Sewer Authority Mid-Coastside (SAM) Treatment Plant operated as a Joint Powers Authority. No septic tanks or alternative wastewater disposal systems are permitted or planned; therefore, no impact would occur.

f. Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Geologic units from a geological map of the county were analyzed for their potential paleontological sensitivity. Paleontological sensitivity is defined as the potential for a geological unit to produce scientifically significant fossils. In *Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources*,⁵⁷ the Society of Vertebrate Paleontology (SVP) defines four categories of paleontological sensitivity (potential) for rock units: high, low, undetermined, and no potential. No records searches or field surveys were conducted as part of the paleontological review.

⁵⁴ City of Half Moon Bay. 2020. *City of Half Moon Bay Local Coastal Land Use Plan 2020 Comprehensive Update, Chapter 7: Environmental Hazards*. October 20. Available at: <https://www.half-moon-bay.ca.us/DocumentCenter/View/3784/Full-Combined-2020-HMB-LCLUP>. Accessed December 9, 2024.

⁵⁵ Natural Resources Conservation Service (NRCS). 2024. Web Soil Survey. Available at: <https://websoilsurvey.nrcs.usda.gov/app/WebSoilSurvey.aspx>. Accessed December 9, 2024.

⁵⁶ City of Half Moon Bay. 2020. *City of Half Moon Bay Local Coastal Land Use Plan 2020 Comprehensive Update, Chapter 7: Environmental Hazards*. October 20. Available at: <https://www.half-moon-bay.ca.us/DocumentCenter/View/3784/Full-Combined-2020-HMB-LCLUP>. Accessed December 9, 2024.

⁵⁷ Society of Vertebrate Paleontology (SVP). 2010. *Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources*. SVP Impact Mitigation Guidelines Revision Committee. Available at: https://vertpaleo.org/wp-content/uploads/2021/01/SVP_Impact_Mitigation_Guidelines.pdf. Accessed December 9, 2024.

The project site is located in the geologic unit Qmt, which are Pleistocene era and described as marine terrace deposits.⁵⁸ There have been no paleontological resources discovered in the project area, and the project would include only minor grading for roads, parking areas, and foundations; therefore, the project is unlikely to disturb a paleontological resource.

The 2020 LCLUP indicates that no paleontological resources of known significance have been identified in the city, and they are extremely limited in the entire county coastal zone.⁵⁹ The project has the potential to impact paleontological resources if the work affects sensitive, previously undisturbed surficial sediment or sedimentary rock. The potential for significant paleontological discovery and impact are anticipated to be low within the proposed work area because the project is on flat land and includes minor grading. In the unlikely event that a paleontological resource is discovered, the City would implement Mitigation Measure GEO-1. As a result, project activities would not directly or indirectly destroy a unique paleontological resource or site or unique geologic feature, and this impact would be less than significant with mitigation.

Mitigation Measures

- GEO-1** In the unlikely event that a paleontological resource is discovered, the City of Half Moon Bay shall comply with California Public Resources Code (PRC) Division 5, Chapter 1.7, Section 5097.5, and Division 20, Chapter 3, Section 30244, which prohibit the removal, without permission, of any paleontological site or feature from lands under the jurisdiction of the State of California or any County, City, district, authority, or public corporation, or any agency thereof. To be consistent with these PRC sections, in the event that paleontological resources are exposed during construction, work in the immediate vicinity of the find must stop until a qualified paleontologist can evaluate the significance of the find. Construction activities may continue in other areas. If the discovery proves significant under the provisions of the California Environmental Quality Act, the paleontologist shall prescribe and the City of Half Moon Bay shall implement additional measures, such as testing or data recovery, to avoid impacts to the resources.

3.8 Greenhouse Gas Emissions

Environmental Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<i>Would the project:</i>				
(a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
(b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

⁵⁸ U.S. Geological Survey (USGS). 1983. Geologic Map of San Mateo County, California. Available at: https://ngmdb.usgs.gov/Prodesc/proddesc_49.htm. Accessed April 1, 2024.

⁵⁹ City of Half Moon Bay. 2020. *City of Half Moon Bay Local Coastal Land Use Plan 2020 Comprehensive Update, Chapter 8: Cultural Resources*. October 20. Available at <https://www.half-moon-bay.ca.us/DocumentCenter/View/3784/Full-Combined-2020-HMB-LCLUP>. Accessed April 1, 2024.

Environmental Evaluation

a. Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

GHG emissions have the potential to significantly affect the environment because such emissions contribute, on a cumulative basis, to the significant cumulative impact of global climate change.

The proposed project is located in the San Francisco Bay Area Air Basin, which is regulated by the BAAQMD. Projects generate GHG emissions during construction and operation (e.g., mobile emissions, emissions from generation of electricity for operations), and projects must be consistent with a local GHG reduction strategy that meets the criteria under State CEQA Guidelines Section 15183.5(b). On April 20, 2022, the BAAQMD adopted changes to its thresholds for evaluating the significance of climate impacts from land use projects and plans under CEQA. In place of numerical thresholds, the focus will be on the design of a project as well as building operations and transportation. At a minimum, building projects should not include natural gas appliances or natural gas plumbing, and cannot result in any wasteful, inefficient, or unnecessary energy usage as determined by the analysis required under CEQA Section 21100(b)(3) and State CEQA Guidelines Section 15126.2(b).

Construction

Construction of the project would result in GHG emissions, which are primarily associated with use of off-road construction equipment, on-road vendor trucks, and worker vehicles. The BAAQMD does not have current GHG significance thresholds; however, construction emissions were calculated and amortized over a 30-year project lifetime. CalEEMod was used to calculate the annual GHG emissions based on the construction scenario described. Construction of Phase 1 of the project is anticipated to last a total of approximately 6 months, and construction of Phase 2 is anticipated to last a total of approximately twelve months. On-site sources of GHG emissions include off-road equipment and off-site sources include vendor trucks and worker vehicles. Table 3.8-2 presents Phase 1 construction emissions for the project from on-site and off-site emission sources.

Table 3.8-2. Estimated Phase 1 Annual Construction Greenhouse Gas Emissions

Construction Years	Metric Tons per Year			
	CO ₂	CH ₄	N ₂ O	CO ₂ e
2026	661.66	0.03	0.02	667.07
Total				667.07
<i>Amortized construction emissions</i>				<i>22.2</i>

Source: SWCA Environmental Consultants (SWCA). 2025. *Air Quality and Greenhouse Gas Technical Report, Smith Field Park Improvements Project, Half Moon Bay, California*. February. (see Appendix D).

Note: CO₂ = carbon dioxide; CH₄ = methane; N₂O = nitrogen oxide, CO₂e = carbon dioxide equivalent

As shown in Table 3.8-2, the estimated total GHG emissions during Phase 1 construction would be approximately 667 metric tons of carbon dioxide equivalent (MTCO₂e) over the construction period. Estimated project-generated construction emissions amortized over 30 years would be approximately 22 MTCO₂e per year. As with project-generated construction criteria air pollutant emissions, GHG emissions generated during construction of the project would only occur when construction is active, lasting only for the duration of the construction period, and would not represent a long-term source of GHG emissions.

Table 3.8-3 presents Phase 2 construction emissions for the project from conservative assumptions for on-site and off-site emission sources.

Table 3.8-3. Estimated Phase 2 Annual Construction Greenhouse Gas Emissions

Construction Years	Metric Tons per Year			
	CO ₂	CH ₄	N ₂ O	CO ₂ e
2027	2,082.00	0.11	0.06	2,103.14
			Total	2,103.14
			<i>Amortized construction emissions</i>	70.1

Source: SWCA Environmental Consultants (SWCA). 2025. *Air Quality and Greenhouse Gas Technical Report, Smith Field Park Improvements Project, Half Moon Bay, California*. February. (see Appendix D).

Note: CO₂ = carbon dioxide; CH₄ = methane; N₂O = nitrogen oxide, CO₂e = carbon dioxide equivalent

As shown in Table 3.8-3, the estimated total GHG emissions during Phase 2 construction would be approximately 2,103 MTCO₂e over the construction period. Estimated project-generated construction emissions amortized over 30 years would be approximately 70 MTCO₂e per year. As with project-generated construction criteria air pollutant emissions, GHG emissions generated during construction of the project would only occur when construction is active, lasting only for the duration of the construction period, and would not represent a long-term source of GHG emissions.

Operation

Project operations are ongoing under the existing Smith Field Park operations. The proposed improvements are not anticipated to increase use or capacity of the park. Therefore, as under existing conditions, the proposed project would generate GHG emissions similar to existing conditions, which is through motor vehicle trips to and from the project site, landscape maintenance equipment operation, energy use, solid waste disposal, off-road equipment, stationary equipment, refrigeration and generation of electricity associated with water supply, treatment, and distribution and wastewater treatment. CalEEMod was used to calculate the annual GHG emissions based on the operational assumptions described in Appendix C. The estimated operational project-generated GHG emissions from area sources, energy usage, motor vehicles, off-road sources, stationary equipment, refrigeration, solid waste generation, and water usage and wastewater generation are shown in Table 3.8-4.

Table 3.8-4. Estimated Annual Operational Greenhouse Gas Emissions

Emission Source	Metric Tons per Year			
	CO ₂	CH ₄	N ₂ O	CO ₂ e
Mobile	644.96	0.02	0.02	652.88
Area	0.00	0.00	0.00	0.00
Energy	7.12	0.00	0.00	7.19
Water	1.65	0.00	0.00	1.66
Waste	0.12	0.01	0.00	0.43
Refrigeration				0.00
Off-Road	144.27	0.01	0.00	144.77
Stationary	45.70	0.00	0.00	45.85
Total	843.82	0.04	0.02	852.77
			<i>Amortized construction emissions</i>	22.2
			Total operational + amortized construction GHGs	875.01

Source: SWCA Environmental Consultants (SWCA). 2025. *Air Quality and Greenhouse Gas Technical Report, Smith Field Park Improvements Project, Half Moon Bay, California*. February. (see Appendix D).

Note: CO₂ = carbon dioxide; CH₄ = methane; N₂O = nitrogen oxide, CO₂e = carbon dioxide equivalent.
 These emissions reflect operational year 2028.

As shown in Table 3.8-4, estimated annual project-generated GHG emissions would be similar to those under existing conditions and would result in approximately 853 MT CO₂e per year. After combining the amortized project construction emissions, total GHGs generated by the project would be approximately 875 MTCO₂e per year. However, the existing Smith Field Park has most of the same facilities as the project, so the net increase in GHG emissions is expected to be minimal.

The project will not utilize natural gas and will not result in any wasteful, inefficient, or unnecessary energy usage. The project operations must also achieve a reduction in project-generated VMT below the regional average consistent with the current version of the California Climate Change Scoping Plan or meet a locally adopted VMT target, and VMT thresholds for San Mateo County are determined on a case-by-case basis. Project operations would remain largely unchanged as the project would replace and upgrade facilities at an existing park. The parking lot will be paved and expanded to create formal spaces, which is different from the informal gravel parking area that exists today. Existing irrigation and lighting infrastructure would be replaced with more energy-efficient facilities. The project would increase the size of the dog park and add a nature trail, playground and picnic facilities, but would remove the existing horseshoe pits (which would likely be located closer to town at the Johnston House or Train Station). The use of the playing fields would remain similar to existing conditions. Therefore, the project is unlikely to significantly alter the VMT generated by existing conditions. The project will be consistent with local GHG reduction strategies meeting the criteria under State CEQA Guidelines Section 15183.5(b). Therefore, construction- and operation-related GHG emissions would be less than significant.

For a project to have no significant impacts to GHG, it must be consistent with requirements from the BAAQMD CEQA Air Quality Guidelines (Table 3.8-1).

Table 3.8-1. Consistency with GHG Requirements

GHG Requirements ¹	Consistency
It must not include natural gas use or infrastructure.	<u>Consistent</u> . The project would not extend natural gas infrastructure.
It must not include wasteful, inefficient, or unnecessary energy usage.	<u>Consistent</u> . The project would replace inefficient lighting with new efficient lighting facilities. The concession stand/restroom buildings would meet CALGreen building standards. The project does not have elements with wasteful or inefficient energy usage.
Screening threshold for small projects: projects that generate or attract fewer than 110 trips per day generally may be assumed to cause a less-than significant transportation impacts. ²	<u>Consistent</u> . The project would upgrade facilities at an existing park and would be unlikely to significantly change park use or VMT by park users; therefore, the project would be unlikely to generate or attract 110 additional trips per day.

Sources:

¹ Bay Area Air Quality Management District (BAAQMD). 2022. *California Environmental Quality Act Air Quality Guidelines, Chapter 6: Project-level Climate Impacts*. Available at: https://www.baaqmd.gov/~media/files/planning-and-research/ceqa/ceqa-guidelines-2022/ceqa-guidelines-chapter-6-project-climate-impacts_final.pdf?rev=ce3ba3fe9d39448f9c15bbabd8c36c7f&sc_lang=en. Accessed December 9, 2024.

² California Governor's Office of Planning and Research. 2018. *Technical Advisory: On Evaluating Transportation Impacts in CEQA*, p. 12. Available at: https://oci.ca.gov/ceqa/docs/20190122-743_Technical_Advisory.pdf. Accessed April 3, 2025.

As shown in Table 3.8-1, the project is consistent with the BAAQMD CEQA Air Quality Guidelines for GHG requirements, and this impact would be less than significant.

b. Would the project conflict with an applicable plan, policy or regulations adopted for the purpose of reducing the emissions of greenhouse gases?

The *San Mateo County Community Climate Action Plan* (CCAP) was approved and adopted as an element of the San Mateo County General Plan in 2022.⁶⁰ The CCAP outlines actionable items that, if successfully implemented, would achieve a 45% reduction of GHG emissions over 1990 levels by 2030 and carbon neutrality by 2040.

The project consists of improvements to an existing park and will include features that align with all applicable plans, policies, and regulations. The project is consistent with the General Plan land use designation of City Parks and is within the General Plan non-residential/residential growth assumptions through the year 2030. The project would be subject to existing regulations and design requirements that reduce GHG emissions in the areas of energy efficiency and green building, renewable energy, waste management, and water conservation. The project includes features that would minimize GHG emissions, such as a site design that improves pedestrian access, energy-efficient lighting and fixtures that are Dark Sky-compliant, and low water-use landscaping. The project would be compliant with the CCAP policies to use all-electric construction (B-1), reduce construction materials and waste (W-1), reduce organics in the waste stream (W-2), and reduce inorganic waste sent to landfills (W-3). Therefore, the project would be compliant with the CCAP. The improved park will function very similarly to the existing park and the GHG emissions impact is expected to be minimal when compared to existing conditions.

Therefore, the project would not conflict with the policies, regulations, or guidelines in the General Plan, CCAP, 2017 Clean Air Plan, or any other applicable plans and/or regulations adopted for the purposes of reducing GHG emissions. Furthermore, the project, as shown in Appendix A, would not generate substantial GHG emissions during construction or operation. Therefore, this impact would be less than significant.

In summary, the project would not conflict with an applicable plan, policy, or regulations adopted for the purpose of reducing the emissions of GHGs; therefore, this impact would be less than significant.

3.9 Hazards and Hazardous Materials

Environmental Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<i>Would the project:</i>				
(a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
(b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐
(c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐

⁶⁰ County of San Mateo Sustainability Department. 2022. *San Mateo County Community Climate Action Plan*. Available at: <https://www.smcsustainability.org/climate-change/climate-action-planning/cc-action-plan>. Accessed February 20, 2025.

Environmental Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
(d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐	☒
(e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☐	☒
(f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
(g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☒	☐

Environmental Evaluation

a. Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

A significant impact may occur if a project would involve the use or disposal of hazardous materials as part of its routine operations or would have the potential to generate toxic or otherwise hazardous emissions that could adversely affect sensitive receptors.

Construction of the project would involve the transport, use, and disposal of potentially hazardous materials, including paints, adhesives, surface coatings, cleaning agents, fuels, and oils that are typically associated with development of any construction project. As described in Chapter 2, *Project Description*, construction activities would be temporary, lasting approximately 6 months in Phase 1. These temporary construction activities involving the use, transport, storage, and disposal of hazardous materials would be conducted in compliance with all health and safety requirements, such as County and City General Plan policies, CCR Sections 337 through 340, Chapter 6.95 of California Health and Safety Code Article 1, and 19 CCR Division 2 (if required). Because the City and contractor would comply with applicable regulations and laws pertaining to the transport, storage, use, and disposal of potentially hazardous materials, the exposure of the public, construction workers, and environment to hazardous materials would be less than significant.

The project includes replacement of and upgrades to existing park facilities. Operation of the park would not change from existing conditions and would involve the use and storage of small quantities of potentially hazardous materials such as cleaning solvents, paints, and pesticides for landscaping that are typically associated with park maintenance.

The City is considering both natural and artificial turf options for Field 3 and the dog park. The existing field is natural grass, and should the City decide to continue to use a natural grass option, it is assumed similar maintenance and watering that occur under current conditions would continue. The City may install artificial turf for the purpose of reducing costs, water usage, and maintenance; however, material decisions will ultimately be decided during Phase 2 construction.

Artificial turf is a synthetic surface material engineered to mimic natural grass. It is made of plastic, blade-like fibers woven into a backing. Infill material between the blades provides cushioning. Other materials under the surface may aid drainage and provide padding. Existing types of artificial turf contain a variety of plastics and chemical additives, which may include, but are not limited to, polyfluoroalkyl substances (PFASs), ortho-phthalates, colorants (green copper metallic complexes or yellow azo compounds), antioxidants to reduce weathering (phenols and organic phosphites), light stabilizers (hindered amine light stabilizers), and ultraviolet light stabilizers (zinc tinuvin, hindered amine light stabilizers).⁶¹ Some of these compounds are present on the California Department of Toxics and Substances Control (DTSC) Candidate Chemicals List, an informational list of chemicals that exhibit “a hazard trait and/or an environmental or toxicological endpoint”.⁶²

Some concerns have been raised related to existing artificial turf options, including human health concerns from potential exposure to hazardous chemicals, release of microplastics into the environment, increase in sports injuries and resistant bacterial infections, and local heat island effects.⁶³ There is research and literature that highlight concerns about the potential impacts of long-term exposure to the existing synthetic turf options that are currently on the market. However, at this time, there is insufficient research defining health impacts and exposure levels for athletes and other users.⁶⁴

Any artificial turf would be installed in Phase 2. Phase 2 construction is expected to take approximately 12 months and would likely occur in several stages; however, the timing for construction of Phase 2 is unknown at this time. As the science and technology regarding artificial turf continues to evolve, the options for synthetic turf will continue to improve. When the City is in a position to make a materials selection, if synthetic turf with low known hazardous exposure cannot be procured, the City will install natural turf. Therefore, health and hazard impacts related to artificial turf would be less than significant.

The project generally would not produce significant amounts of hazardous waste or use or transport hazardous waste beyond those materials typically used in public parks. Thus, operation of the project would not create a significant hazard to the environment or public, and this impact would be less than significant.

b. Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

A significant impact may occur if a project could create an upset or accident condition involving hazardous materials. No hazardous contamination sites are located within 1 mile of the project site.^{65, 66}

⁶¹ California Department of Toxic Substances Control (DTSC). 2024. *Background Document on Candidate Chemicals in Artificial Turf*. Available at: <https://dtsc.ca.gov/wp-content/uploads/sites/31/2024/07/Background-Document-on-Candidate-Chemicals-in-Artificial-Turf.pdf>. Accessed March 4, 2025.

⁶² California Department of Toxic Substances Control (DTSC). 2025. *Candidate Chemical Terms*. Available at: <https://dtsc.ca.gov/scp/candidate-chemical-terms/>. Accessed April 8, 2025.

⁶³ Santa Clara County Medical Association. 2024. *Recommendation to Use Natural Turf Grass on Santa Clara County Fairgrounds*. Available at: <https://www.sccma.org/LinkClick.aspx?fileticket=C0f6wf5p9uY%3D&portalid=19>. Accessed March 4, 2025.

⁶⁴ California Department of Toxic Substances Control (DTSC). 2024. *Background Document on Candidate Chemicals in Artificial Turf*. Available at: <https://dtsc.ca.gov/wp-content/uploads/sites/31/2024/07/Background-Document-on-Candidate-Chemicals-in-Artificial-Turf.pdf>. Accessed March 4, 2025.

⁶⁵ State Water Resources Control Board (State Water Board). 2024. *GeoTracker*. Available at: <https://geotracker.waterboards.ca.gov/map/>. Accessed December 9, 2024.

⁶⁶ California Department of Toxics Substances Control (DTSC). 2024. *EnviroStor*. Available at: <https://www.envirostor.dtsc.ca.gov/public/map>. Accessed December 9, 2024.

Construction of the project would use small amounts of hazardous materials, such as diesel fuel. The BMPs implemented for the SMCWPPP (discussed further in Section 3.10, *Hydrology and Water Quality*) would contain minor spills during construction. During operation, the use of household hazardous materials would be minimal, in small quantities, and associated with routine maintenance, cleaning, and landscaping activities. Therefore, the project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment, and this impact would be less than significant.

c. Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

A project-related significant adverse effect may occur if a project site is within 0.25 mile of an existing or proposed school site, and the project is projected to release hazardous emissions that would exceed regulatory thresholds and would pose a health hazard. The closest school is Alvin S. Hatch Elementary School, located approximately 0.83 miles northeast of the project site. Therefore, the project site is not within 0.25 miles of an existing or proposed school site, and no impact would occur.

d. Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code §65962.5 and, as a result, would it create a significant hazard to the public or the environment?

California Government Code Section 65962.5 requires various State agencies to compile lists of hazardous waste disposal facilities, unauthorized release from underground storage tanks, contaminated drinking water wells, and solid waste facilities from which there is known migration of hazardous waste, and to submit such information to the Secretary for Environmental Protection on at least an annual basis. In meeting the provisions in California Government Code Section 65962.5, commonly referred to as the “Cortese List,” database resources such as EnviroStor and GeoTracker provide information regarding identified facilities. According to EnviroStor⁶⁷ and GeoTracker,⁶⁸ no hazardous contamination sites are located within 0.5 miles of the project site; the closest site is approximately 0.58 miles northeast.

The project site became a park in 1964 and facilities have been added over the years. The use of lead-based paint was banned in 1978 in California, the use of poly biphenyl caulk was banned in 1979, and the use of asbestos-containing building materials was banned in 1989. Some appliances, light bulbs, and electronics contain mercury.⁶⁹ As recommended by the DTSC, the project would test buildings (concession/restroom and storage buildings) and other structures to be demolished for the presence of lead-based paints or products, mercury, asbestos-containing materials, and polychlorinated biphenyl caulk. In addition, as recommended by DTSC, all imported soil and fill material would be tested to assess contaminants of concern as outlined in DTSC’s *Preliminary Endangerment Assessment (PEA) Guidance Manual*.⁷⁰

⁶⁷ California Department of Toxics Substances Control (DTSC). 2024. EnviroStor. Available at: <https://www.envirostor.dtsc.ca.gov/public/map>. Accessed April 5, 2024.

⁶⁸ State Water Resources Control Board (State Water Board). 2024. GeoTracker. Available at: <https://geotracker.waterboards.ca.gov/map/>. Accessed April 5, 2024.

⁶⁹ U.S. Environmental Protection Agency. 2024. *Mercury in Consumer Products*. Available at: <https://www.epa.gov/mercury/mercury-consumer-products#list>. Accessed December 9, 2024.

⁷⁰ California Department of Toxics Substances Control (DTSC). 2001. *DTSC Information Advisory Clean Imported Fill Material Fact Sheet*. Available at: <https://dtsc.ca.gov/information-advisory-clean-imported-fill-material-fact-sheet/#:~:text=Detectable%20amounts%20of%20compounds%20of%20concern%20within,have%20been%20assigned%20need%20to%20be%20evaluated>. Accessed December 9, 2024.

Therefore, the project would not create a significant hazard to the public or the environment, and no impact would occur.

e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?

The project site is not located within an airport land use plan or within 2 miles of a public airport. Therefore, the project would not result in a safety hazard for people using the project area, and no impact would occur.

f. Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

A significant impact may occur if a project were to interfere with roadway operations used in conjunction with an emergency response plan or emergency evacuation plan or would generate sufficient traffic to create traffic congestion that would interfere with the execution of such a plan.

Highways 1 and 92 provide the only evacuation routes into and out of the city, and the nearest emergency evacuation route to the project site is Highway 1.⁷¹ Construction of the proposed project would result in minimal amounts of traffic related to worker trips, delivery of materials, and disposal of excavated soils. The project would be constructed at the western end of Wavecrest Road, beginning approximately 200 feet west of Highway 1. Construction traffic would not impede public access or interfere with any adopted emergency response plan or emergency evacuation plan. Construction activities and staging would occur on the project parcel and would not affect the public right-of-way.

Therefore, the project would not impair the implementation of or physically interfere with an emergency response plan or emergency evacuation plan, and no impact would occur.

g. Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

A significant impact may occur if a project is located in proximity to wildland areas and would pose a potential fire hazard, which could affect persons or structures in the area in the event of a fire. The project is in a Local Responsibility Area and served by the Coastside Fire Protection District (CFPD). The Half Moon Bay Fire Station is approximately 0.38 miles northeast of the project area.

The project site is an established city park. In February 2025, the California Department of Forestry and Fire Protection (CAL FIRE) released a new draft Local Area Fire Hazard Severity Zone Map for San Mateo County. According to the new data, the project site is located in a High Fire Hazard Severity Zone and approximately 400 feet west of a Very High Fire Hazard Severity Zone (VHFHSZ) in a Local Responsibility Area.⁷² According to the Association of Bay Area Governments (ABAG), the project area is also located approximately 450 feet west of a wildland-urban interface (WUI) area.⁷³ The WUI is best

⁷¹ City of Half Moon Bay. 2013. *Half Moon Bay Circulation Element*. Available at: <https://www.half-moon-bay.ca.us/DocumentCenter/View/187/2013-Circulation-Element-PDF>. Accessed April 5, 2024.

⁷² California Department of Forestry and Fire Protection (CAL FIRE). 2025. Local Responsibility Area Fire Hazard Severity Zones. Available at: <https://calfire.app.box.com/s/wahuw9ny7cgn89xpxh7092ur50r1pwvj/folder/308445234395>. Accessed February 26, 2025.

⁷³ Association of Bay Area Governments (ABAG). 2020. Wildland-Urban Interface Fire Threat Interactive Map. Available at: <https://mtc.maps.arcgis.com/home/item.html?id=d45bf08448354073a26675776f2d09cb>. Accessed December 6, 2024.

described as an area where urban development is interspersed in an area dominated by wildland vegetation subject to wildfire. As its name implies, this type of interface involves a mixing of rural and urban land uses in the same area.

However, the project would upgrade facilities at an existing park, including the installation of a new water line and fire hydrant that will comply with CFPD requirements. The project site is approximately 0.38 miles from a fire station and the project has been reviewed by CFPD staff and will be required to comply with CFPD requirements. Although the project could expose people or structures to the risk of wildland fire, it would not significantly alter the uses at the park or the numbers of park users and will comply with all CFPD requirements to reduce risks; therefore, this impact would be less than significant.

3.10 Hydrology and Water Quality

Environmental Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<i>Would the project:</i>				
(a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐
(b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
(c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
(i) Result in substantial erosion or siltation on- or off-site;	☐	☐	☒	☐
(ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	☐	☐	☒	☐
(iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	☐	☐	☒	☐
(iv) Impede or redirect flood flows?	☐	☐	☐	☒
(d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☐	☒
(e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☐	☒

This section describes the potential impacts to the hydrology and water quality of the project site with development of the proposed project. Potential effects are evaluated relative to important hydrologic features (Wavecrest Watercourse and Seymour Ditch) and the existing soils and groundwater of the landscape. Impacts related to hydrology and water quality of a site are usually addressed through an evaluation of the project-related changes to the existing surface and groundwater features, and the modifications that would alter the surface runoff and surrounding hydrologic features.

Environmental Evaluation

a. Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Activities associated with construction of the project could have a significant impact if they resulted in violation of waste discharge requirements under the San Francisco Bay RWQCB's Municipal Regional Stormwater NPDES Permit from contaminated runoff entering the stormwater system.

The SMCWPPP is a partnership of the City/County Association of Governments of San Mateo County, each incorporated city and town in the county, and the County, which share a common NPDES permit. The Municipal Regional Stormwater NPDES Permit was issued by the San Francisco Bay RWQCB⁷⁴ in compliance with the *Water Quality Control Plan for the San Francisco Bay Basin (Basin Plan)*⁷⁵ and the NPDES Program. Participating agencies (including the County and City) must comply with the provisions of the countywide permit by ensuring that new development and redevelopment mitigate, to the maximum extent practicable, water quality impacts from stormwater runoff during both construction and operational periods of projects.

Construction

The survey area is located within the Purisima Creek – Frontal Pacific Ocean watershed (Hydrologic Unit Code 12),⁷⁶ which drains into the Pacific Ocean, a traditional navigable water. The survey area receives water discharge and stormwater runoff from the surrounding agricultural fields and developed areas via the Wavecrest Watercourse, as well as stormwater sheet flow from the surrounding uplands. The Wavecrest Watercourse also receives water from a series of culverts that drain the developed portions of the survey area.

Construction of the project would be required to implement a SWPPP under the State Water Resources Control Board (State Water Board) Construction General Permit Order 2022-0057-DWQ,⁷⁷ Municipal Regional Stormwater NPDES Permit,⁷⁸ and SMCWPPP.⁷⁹ The SWPPP must include site-specific BMPs that are designed to prevent runoff from construction areas to reduce potential impacts to surface water quality during project construction. The SWPPP would also include design elements and BMPs for construction areas, such as fueling and equipment washing areas and trash and hazardous material storage

⁷⁴ San Francisco Regional Water Quality Control Board (RWQCB). 2022. *Municipal Regional Stormwater NPDES Permit*. Order No. R2-2022-0018. NPDES Permit No. CAS612008. California Regional Water Quality Control Board, San Francisco Bay Region. May 11. Available at: https://www.waterboards.ca.gov/sanfranciscobay/board_decisions/adopted_orders/2022/R2-2022-0018.pdf. Accessed December 10, 2024.

⁷⁵ San Francisco Regional Water Quality Control Board (RWQCB). 2023. *Water Quality Control Plan for the San Francisco Bay Basin (Basin Plan)*. California Regional Water Quality Control Board, San Francisco Bay Region. Available at: https://www.waterboards.ca.gov/sanfranciscobay/basin_planning.html. Accessed December 10, 2024.

⁷⁶ U.S. Geological Survey (USGS). 2022. National Hydrography Dataset GIS Data. Available at: <http://nhd.usgs.gov/>. Accessed October 18, 2022.

⁷⁷ State Water Resources Control Board (State Water Board). 2022. Construction Stormwater Program. Available at: https://www.waterboards.ca.gov/water_issues/programs/stormwater/construction.html. Accessed December 10, 2024.

⁷⁸ San Francisco Regional Water Quality Control Board (RWQCB). 2022. *Municipal Regional Stormwater NPDES Permit*. Order No. R2-2022-0018. NPDES Permit No. CAS612008. California Regional Water Quality Control Board, San Francisco Bay Region. May 11. Available at: https://www.waterboards.ca.gov/sanfranciscobay/board_decisions/adopted_orders/2022/R2-2022-0018.pdf. Accessed December 10, 2024.

⁷⁹ County of San Mateo. 2020. San Mateo Countywide Water Pollution Prevention Program: Construction Best Practices. Available at: <https://www.flowstobay.org/construction>. Accessed December 10, 2024.

areas. No construction would occur during major rain events, minimizing any chance of runoff from the project site. Major rain events would be considered as a prediction of 0.25 inches or more in 24 hours.

Construction of the Smith Field Park improvements would require excavation and grading for the Wavecrest Road improvement, parking lot, and paved walkways, as well as the new water line, irrigation facilities, other utilities, and building foundations. Excavation and grading could result in an increase in erosion and sedimentation from the project area into adjacent wetlands and stormwater ditches. Construction materials and waste, such as old asphalt and other debris, could also enter adjacent wetlands. Construction activities associated with the project would require the presence of construction vehicles, heavy equipment and materials, and construction crews. In addition to stormwater runoff and potential resulting water quality and sedimentation impacts, there is the potential for hazardous materials, including petroleum products associated with diesel vehicle and equipment use and contaminants from paving materials, concrete mixing, pouring and washout, and sanitary facilities, to enter adjacent wetlands and stormwater ditches and contribute pollutants that can affect water quality and may violate water quality standards if left uncontrolled. Construction activities for Phase 1 would last approximately 6 months beginning in spring 2025. Major grading would be completed by the start of the wet weather season, which begins October 15.

The project would be required to comply with the Construction General Permit and SMCWPPP and to develop a SWPPP. The project would create approximately 83,977 square feet of new impervious surface. Stormwater BMPs under the SWPPP include, but would not be limited to:

- Attach the SMCWPPP construction BMP plan sheet to project plans and require the project Contractor to implement applicable BMPs on the plan sheet.
- Create temporary erosion controls to stabilize all denuded areas until permanent erosion controls are established.
- Perform clearing and earth-moving activities only during dry weather.
- Trap sediment on-site using BMPs, such as sediment basins or traps, earthen dikes or berms, silt fences, check dams, compost blankets or jute mats, covers for soil stockpiles, etc.
- Protect adjacent properties and undisturbed areas from construction impacts using vegetative buffer strips, sediment barriers, dikes, mulching, or other areas, as appropriate.
- Limit construction access routes and stabilize designated access points.
- Do not clean, fuel, or maintain vehicles on-site, except in a designated area where wash water is confined and treated.
- Store, handle, and dispose of construction materials/wastes properly to prevent contact with stormwater.
- Train and provide instruction to all employees/subcontractors regarding construction SWPPP BMPs.
- Control and prevent the discharge of all potential pollutants, including pavement cutting wastes, paints, concrete, petroleum products, chemicals, wash water or sediments, rinse water from architectural copper, and non-stormwater discharges to storm drains or watercourses.

Implementation of the SWPPP and compliance with the SMCWPPP, as required by law, would prevent construction of the project from violating any water quality standards or waste discharge requirements or otherwise substantially degrading surface water or groundwater quality, and would reduce potentially significant impacts to a less-than-significant level. Implementation of Mitigation Measure BIO-4 would further reduce these less-than-significant impacts.

Operation

The project would add approximately 83,977 square feet (1.93 acres) of impervious surface area to Smith Field Park. This additional impervious surface area would increase the stormwater runoff volume and rate compared with existing conditions, which could in turn accelerate soil erosion and loss of topsoil if stormwater were conveyed onto adjacent undeveloped land.

The project would be required to comply with the C.3 Regulated Projects Checklist, as required by the SMCWPPP. A C.3-regulated project is one that creates or replaces 10,000 or more square feet of impervious surface.

In addition, the project would be required to adhere to the City's LID requirements. The City has developed the GIP, which requires construction projects to prioritize green infrastructure to capture stormwater.⁸⁰

As described in Section 2.3.2, *Project Facilities and Improvements*, the project would replace the existing sump pumps and drains with new stormwater bioretention basins and planters adequate to contain a 10-year, 2-hour storm. The project would be divided into eight drainage management areas (DMAs) with individual bioretention basins or planters designed to prevent an increase in off-site runoff from a 10-year, 2-hour storm in order to comply with the Municipal Regional Stormwater NPDES Permit. Overflow from a larger storm event would drain via storm drains and a force main to two outfalls to the vacant field to the north (see Appendix A).

The project includes a comprehensive stormwater management system with eight distinct DMAs based on stormwater flow patterns (see Appendix A). Stormwater runoff on the project site would be collected by overland flow and directed away from buildings to three stormwater bioretention basins scattered throughout the project site. The required and provided bioretention square footage for each DMA is shown in Table 3.10-1. The bioretention basins would be designed to comply with the project's dual requirements of stormwater treatment and GIP requirements.⁸¹ Stormwater treatment for the proposed project will be comprised of 100% LID treatment methods in the form of bioretention areas. No mechanical treatment methods are proposed (see Appendix A).⁸²

Table 3.10-1. Drainage Management Areas

Drainage Management Areas	Bioretention Required or Self-Treating	Impervious Area (square feet)	Pervious Area (square feet)	Bioretention Area Required (square feet)
Phase 1				
DMA 1	Bioretention basin	68,563	1,350	300
DMA 2	Bioretention planter	22,858	--	1,400
DMA 3	Bioretention planter	24,790	--	1,024

⁸⁰ City of Half Moon Bay. 2019. *City of Half Moon Bay Green Infrastructure Plan*. September. Available at: <https://www.half-moon-bay.ca.us/617/Green-Infrastructure>. Accessed December 10, 2024.

⁸¹ City of Half Moon Bay. 2019. *City of Half Moon Bay Green Infrastructure Plan*. September. Available at: <https://www.half-moon-bay.ca.us/617/Green-Infrastructure>. Accessed December 10, 2024.

⁸² Freyer & Laureta, Inc. 2024. *35% Design Plans for Smith Field Park Improvements Project, Page C9.0. Stormwater Management Plan*. September 13.

Drainage Management Areas	Bioretention Required or Self-Treating	Impervious Area (square feet)	Pervious Area (square feet)	Bioretention Area Required (square feet)
Phase 2				
DMA 1	Bioretention basin	10,934	3,049	400
DMA 2	Bioretention basin	17,293	4,879	784
DMA 3	Bioretention planter	7,057	1,089	256
DMA 4	Self-treating	0	82,418	0
DMA 5	Self-treating	0	79,291	0
DMA 6	Self-treating	0	51,073	0
DMA 7	Self-treating	0	117,982	0
DMA 8	Self-treating	0	126,837	
Total		151,495	467,968	4,164

Source: Freyer & Laureta, Inc. 2024. 35% Design Plans for Smith Field Park Improvements Project, Page C9.0. Stormwater Management Plan. September 13 (see Appendix A).

Compliance with the preliminary stormwater management plan and Municipal Regional Stormwater Permit and Planning Department requirements would reduce drainage and stormwater impacts to a less-than-significant level.

Erosion and sedimentation may temporarily increase post-construction because of soils that have been loosened and changes in drainage patterns. Construction of Smith Field Park improvements could temporarily result in an increase in the levels of urban pollutants and litter entering adjacent wetlands and drainages. Pollutants in post-construction runoff from the project could include sediment and materials such as vehicle fuel, oils, and lubricants used in vehicles. However, the earth-moving aspects of the project are anticipated to be completed by October 15, which is the start of the rainy season. Therefore, the project site is anticipated to be stabilized by reseeding with native seeds prior to October 15. If the project earth-moving work is not completed and stabilized by October 15, the project Contractor would employ the required site-specific BMPs included in the SWPPP that are designed to prevent runoff from construction areas (see Appendix A). Once complete, all areas of the project would be stabilized, revegetated, and landscaped to prevent uncontrolled runoff into surrounding wetlands and drainages. Therefore, post-construction runoff from the project would not result in a violation of any water quality standards or waste discharge requirements, and this impact would be less than significant.

Phase 2 of the project would include installation of either natural or artificial turf in Field 3 and the dog park. Fields 1, 2, 4, and 5 would receive natural turf. Existing types of artificial turf may be a source of environmental pollutants and microplastics in stormwater runoff. Artificial turf breaks down over time from sunlight, heat, rain, and consistent use. Runoff from artificial turf may contain pollutants such as heavy metals, PFASs, microplastics, and other chemicals that can reach surface and groundwater.⁸³ However, the timing for construction of Phase 2 is unknown and possibly far down the line. As the science and technology for artificial turf continues to evolve, it is possible that the options for synthetic turf will continue to improve. When the City is in a position to make a materials selection, if low-impact synthetic turf cannot be procured, the City will install natural turf. Therefore, water quality impacts related to artificial turf would be less than significant.

⁸³ Western Resource Advocates. 2022. *Is Artificial Turf a Beneficial Water Conservation Tool in the West?* Available at: https://westernresourceadvocates.org/wp-content/uploads/2023/01/2022_WRA_Artificial_Turf_Report.pdf. Accessed April 8, 2025.

The project would increase impervious surfaces on-site by approximately 83,977 square feet. Operation of the project would be unlikely to involve activities that would generate new sources of pollutants on-site, as it is an existing park. New activities would include using picnic and barbeque facilities as well as the nature trail. Use of the existing facilities (softball fields, multi-use field, and dog park) would be unlikely to change. New impervious surfaces, including the parking lot, collect automobile-derived pollutants such as oils, greases, heavy metals, and rubber; however, the newly paved parking lot would include storm drainage facilities that would direct stormwater to LID treatment areas. Under existing conditions, stormwater runs off the graveled parking lot into surrounding areas; therefore, implementation of a new stormwater collection and treatment system would have a beneficial impact on stormwater runoff.

The project would comply with the construction site controls, site design measures, source control regulations, and stormwater treatment measures outlined in the ESCP, SWPPP, and Municipal Regional Stormwater Permit, as outlined in the design plans (see Appendix A). With inclusion of the above-cited regulatory requirements, implementation of the project would not violate any water quality standards or waste discharge requirements, and this impact would be less than significant. Implementation of Mitigation Measure BIO-4 would further reduce less-than-significant construction impacts related to stormwater runoff.

Mitigation Measures

In order to further reduce less-than-significant impacts related to Impact Discussion 3.10.a, the project shall comply with Mitigation Measure BIO-4 in Section 3.4, *Biological Resources*, to minimize impacts to wetlands and waters.

b. Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

A potentially significant impact would occur if a project includes deep excavations resulting in the potential to interfere with groundwater movement, the withdrawal of groundwater, or paving of existing permeable surfaces important to groundwater recharge. The project would include minor excavation and grading (to a maximum depth of 3 feet) for roads, parking areas, utilities, and foundations for park facilities, which would not impact the groundwater table. Therefore, no impact from excavation would occur.

Project construction would be served by the Coastside County Water District (CCWD) water supply system, as described in Section 3.19, *Utilities and Service Systems*. Project operation would result in some groundwater use due to the source of CCWD supplies. Water use is not expected to increase significantly as a result of the project. Existing irrigation facilities and the concession stand would be replaced and additional restrooms, drinking fountains, and a fire hydrant would be added resulting in a slight increase in water use. During Phase 2, the project would install either natural or artificial turf on Field 3 and the dog park. Replacement of natural turf with synthetic turf in Field 3 would be likely to slightly reduce water use. This would not substantially decrease groundwater supplies, and no impact would occur.

The project area is located within the State Water Board San Francisco Bay Hydrologic Region. The project area is underlain by an alluvial aquifer referred to as the Half Moon Bay Terrace groundwater basin. The portion of the groundwater basin in the vicinity of the Moss Beach Airport supplies limited water for domestic and municipal uses. There are no municipal wells in the project area. Most

groundwater recharge in the project area occurs locally from streams rather than from rainfall. Groundwater in the project area flows from east to west, discharging into the Pacific Ocean.^{84,85}

As stated previously, the project would increase impervious surfaces on-site by approximately 83,977 square feet. Impervious surfaces prevent the infiltration of runoff into the underlying soil and can interfere with groundwater recharge. Groundwater depth is not known in the project area; however, based on the presence of numerous single-parameter wetlands surrounding the project site, groundwater is likely to be close to the surface through most of the area. Ground and surface water flow north and west towards the Pacific Ocean approximately 0.34 miles west. Therefore, the project would not substantially interfere with groundwater recharge.

With implementation of the project, an approximately 14.1-acre portion of the project site would remain pervious and continue to serve as groundwater recharge during storm events. The remaining impervious areas would be served by bioretention basins and planters. Stormwater within the basins and planters would be retained, and overflow would be discharged into the open fields north of the project site via storm drains. The majority of stormwater within the bioretention basins and planters would percolate to groundwater. Local recharge within the Half Moon Bay Terrace groundwater subbasin comes primarily from storm events.

As the project site is not identified as an important area for groundwater recharge, and because the majority of the runoff from the project site would be retained in bioretention basins and planters that would facilitate recharge, a reduction in the amount of pervious area on-site would not substantially interfere with groundwater recharge. The impact on groundwater recharge would be less than significant.

c. Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

i. Result in substantial erosion or siltation on- or off-site?

Planned earthwork and grading activities on the project site would involve approximately 1,352 CY of cut and approximately 31,294 CY of fill. The project site slopes gradually to the north, and all project components would be required to implement erosion control measures as discussed under Impact Discussion 3.10.a.

Construction of the project would include implementation of SWPPP BMPs under the State Water Board General Construction Permit and SMCWPPP. In addition, the project would comply with Mitigation Measure BIO-4 to minimize impacts to surrounding wetlands and stormwater drainages. As discussed under Impact Discussion 3.10.a, operational stormwater flows would continue to be directed to the open field north of the project site. Operation of the project would result in an increase of impervious surface compared with existing conditions (approximately 83,977 square feet or 1.9 acres). This includes a newly paved parking lot and new plazas, walkways, and foundations for park facilities. The stormwater site design measures would include minimizing impervious surface areas through clustering of facilities, limiting disturbance of natural waterbodies and drainage systems, conserving natural areas, and directing runoff from parking lot, roofs, walkways, plazas, and parking areas onto vegetation areas. Water from each DMA would be discharged to bioretention areas with 100% LID treatment methods for treatment,

⁸⁴ California Department of Water Resources (DWR). 2024. Groundwater Basin Boundary Assessment Tool. Available at: <https://gis.water.ca.gov/app/bbat/>. Accessed December 11, 2024.

⁸⁵ California Department of Water Resources (DWR). 2014. *Bulletin 118 – Half Moon Bay Terrace Groundwater Basin*. Available at: https://water.ca.gov/-/media/DWR-Website/Web-Pages/Programs/Groundwater-Management/Bulletin-118/Files/2003-Basin-Descriptions/2_022_HalfMoonBayTerrace.pdf. Accessed December 11, 2024.

and overflow would be discharged to the field north of the project site through new stormwater drains, including a force main. Therefore, the project would not substantially alter the existing drainage pattern in a manner that would cause erosion. The project site would not alter the course of a stream or river. Therefore, the project would not substantially alter the existing drainage pattern of the project site resulting in substantial erosion or siltation, and this impact would be less than significant.

Mitigation Measures

In order to further reduce less-than-significant impacts related to Impact Discussion 3.10.c.i, the project shall comply with Mitigation Measure BIO-4 in Section 3.4, *Biological Resources*, to minimize impacts to wetlands and waters.

ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

A significant impact may occur if a project results in increased runoff volumes during construction or operation of the project that would result in flooding conditions affecting the project site or nearby properties. Per the SMCWPPP C.3 Stormwater Handbook, “Projects that create and/or replace 10,000 square feet or more of impervious surface must comply with Provision C.3.” Therefore, the proposed project is a Regulated Project and will comply with Provision C.3 of the Municipal Regional Stormwater Permit. Stormwater quality requirements under the Municipal Regional Stormwater Permit include source control and site design measures to retain and slowly release runoff so that post-development conditions do not exceed those of the predevelopment conditions for projects that create and/or replace 1 acre or more of impervious surface and creates an increase in total impervious surface from the pre-project condition.

As described in Impact Discussions 3.10.a and 3.10.b, the project would result in a relatively large increase in impervious surface area (approximately 83,977 square feet or 1.9 acres) and would construct new stormwater channels and bioretention basins adequate to contain runoff from a 10-year, 2-hour storm event. Overflow would be directed to the field north of the project site through new stormwater drains and a new force main (see Appendix A). The project hydromodification measures would change the timing, peak discharge, and volume of runoff from the project site to not exceed the pre-development condition. Therefore, the project would not increase the rate or amount of surface runoff in a manner that would result in flooding, and this impact would be less than significant.

iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Stormwater from the project site flows via drainage pipes and overland through open space to the north, which is in an area of minimal flood hazard. Federal Emergency Management Agency (FEMA) maps do not show a flood hazard zone in the vicinity of the project.⁸⁶ As described in Impact Discussions 3.10.a and 3.10.b, the project would result in a relatively large increase in impervious surface area (approximately 83,977 square feet or 1.9 acres). This increase will be offset by the bioretention areas that will provide stormwater treatment and detention to limit the peak discharge to pre-development flow rates. Stormwater improvements would meet the requirements of the City’s GIP and have capacity to contain runoff from the increase in impervious surface area. Therefore, the project would not increase the

⁸⁶ Federal Emergency Management Agency (FEMA). 2020. FEMA Flood Map Service Center. Available at: <https://msc.fema.gov/portal/search?AddressQuery=909%20Grandview%20Boulevard%20Half%20Moon%20Bay%20CA#searchresultsanchor>. Accessed December 11, 2024.

rate or amount of surface runoff in a manner that would exceed the capacity of the City's stormwater system, and this impact would be less than significant.

iv. Impede or redirect flood flows?

A significant impact may occur if a project were located in a flood hazard area and would impede or redirect flood flows. The project is not mapped in a flood hazard zone and is not located in an area with known localized flooding issues.⁸⁷ The existing sump pumps and drainage pipes are not always adequate to drain the baseball fields after a heavy rain. The new drainage system will improve drainage issues in the park and on the playing fields. Therefore, the project would not impede or redirect flood flows, and no impact would occur.

d. Would the project in flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

The project is not located in flood hazard, tsunami or seiche zone.^{88,89,90} Therefore, the project would not risk the release of pollutants due to project inundation. Therefore, no impact would occur.

e. Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

The project site is located in the Half Moon Bay Terrace groundwater basin,⁹¹ which does not have a sustainable groundwater management plan and is on the list of groundwater basins with low priority for developing such a plan.⁹² The project would rely on municipal water sources for construction and operation and would not obstruct groundwater recharge. Therefore, the project would not conflict with or obstruct the implementation of a sustainable groundwater management plan, and no impact would occur.

The project would abide by all requirements of the SMCWPPP, San Francisco Bay RWQCB Municipal Regional Stormwater NPDES Permit, and City's GIP.^{93,94} The project would not conflict with the Basin

⁸⁷ Federal Emergency Management Agency (FEMA). 2024. FEMA's National Flood Hazard Layer Viewer. Data refreshed June. Available at: <https://www.arcgis.com/apps/webappviewer/index.html?id=8b0adb51996444d4879338b5529aa9cd>. Accessed December 11, 2024.

⁸⁸ Federal Emergency Management Agency (FEMA). 2024. FEMA's National Flood Hazard Layer Viewer. Data refreshed June. Available at: <https://www.arcgis.com/apps/webappviewer/index.html?id=8b0adb51996444d4879338b5529aa9cd>. Accessed December 11, 2024.

⁸⁹ California Department of Conservation (CDOC). 2024. *San Mateo County Tsunami Hazard Areas*. Available at: <https://www.conservation.ca.gov/cgs/tsunami/maps/san-mateo>. Accessed December 11, 2024.

⁹⁰ California Department of Water Resources (DWR). 2018. California Dam Breach Inundation Maps. California Department of Water Resources, Division of Safety of Dams. Available at: <https://fmds.water.ca.gov/maps/damim/>. Accessed December 11, 2024.

⁹¹ California Department of Water Resources (DWR). 2024. Groundwater Basin Boundary Assessment Tool. Available at: <https://gis.water.ca.gov/app/bbat/>. Accessed December 11, 2024.

⁹² California Department of Water Resources (DWR). 2014. *California's Groundwater Bulletin 118: Half Moon Bay Terrace Groundwater Basin*. June 30. Available at: https://water.ca.gov/-/media/DWR-Website/Web-Pages/Programs/Groundwater-Management/Bulletin-118/Files/2003-Basin-Descriptions/2_022_HalfMoonBayTerrace.pdf. Accessed December 11, 2024.

⁹³ San Francisco Regional Water Quality Control Board (RWQCB). 2022. *Municipal Regional Stormwater NPDES Permit*. Order No. R2-2022-0018. NPDES Permit No. CAS612008. California Regional Water Quality Control Board, San Francisco Bay Region. May 11. Available at: https://www.waterboards.ca.gov/sanfranciscobay/board_decisions/adopted_orders/2022/R2-2022-0018.pdf. Accessed December 10, 2024.

⁹⁴ City of Half Moon Bay. 2019. *City of Half Moon Bay Green Infrastructure Plan*. September. Available at: <https://www.half-moonbay.ca.us/DocumentCenter/View/2305/HalfMoonBayGIPlan09-2019Final1>. Accessed April 29, 2024.

Plan because it would comply with all applicable requirements of both the Municipal Regional Stormwater NPDES Permit and the SMCWPPP permit, and no impact would occur.

3.11 Land Use and Planning

Environmental Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<i>Would the project:</i>				
(a) Physically divide an established community?	☐	☐	☐	☒
(b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☒	☐

Environmental Evaluation

a. Would the project physically divide an established community?

The project would upgrade facilities at an existing park. Therefore, the project would not divide an established community, and no impact would occur.

b. Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

A project would normally have a significant impact related to land use consistency if it would be inconsistent with the General Plan or its elements, a local coastal plan, or adopted environmental goals or policies, or if it would require a General Plan amendment or zone change.

The project would improve and upgrade facilities at an existing park on property that is designated PUD under the City's zoning code and has a land use designation of City Parks (CI) under the 2020 LCLUP.^{95,96} The project site is currently developed as a park and that use would not change. The project site is located within the California Coastal Zone, and was reviewed for consistency with policies relating to the 2020 LCLUP and City Zoning Ordinance (Title 18)⁹⁷ and found to be consistent with City policies and development regulations.

Construction would temporarily impede access to portions of the park, but construction would be short term, lasting approximately 6 months. Therefore, construction impacts would be less than significant.

⁹⁵ City of Half Moon Bay. 2024. City of Half Moon Bay Zoning Map. Available at: <https://www.half-moon-bay.ca.us/DocumentCenter/View/129/Zoning-Map-PDF?bidId=>. Accessed December 11, 2024.

⁹⁶ City of Half Moon Bay. 2020. *City of Half Moon Bay Local Coastal Land Use Plan 2020 Comprehensive Update, Chapter 2: Development; Figure 2-1: Land Use Map*. Available at: <https://www.half-moon-bay.ca.us/154/Local-Coastal-Program-Land-Use-Plan>. Accessed December 11, 2024.

⁹⁷ City of Half Moon Bay. 2020. *City of Half Moon Bay Local Coastal Land Use Plan 2020 Comprehensive Update, Chapter 6: Natural Resources; Figure 6-2: Environmentally Sensitive Habitat Areas*. October 20. Available at <https://www.half-moon-bay.ca.us/DocumentCenter/View/3784/Full-Combined-2020-HMB-LCLUP>. Accessed December 11, 2021.

Operationally, the project would improve park facilities and be compatible with the LCLUP⁹⁸ as follows:

- The project would improve accessibility to Smith Field Park by installing ADA-compatible parking spaces, picnic areas, and walking paths, which is compatible with Policy 5-3, Environmental Justice.
- The project would improve the trailhead facilities at the access point to Wavecrest Open Space, the California Coastal Trail, and the Pacific Ocean, which would improve pedestrian access to Wavecrest Open Space and the coast and is compatible with Policy 5-13, Coastal Access Improvements.
- The project would improve parking for coastal access via the Wavecrest Open Space, which is compatible with Policy 5-14, Siting and Design of Parking for Coastal Access Points.
- The LCLUP contains numerous policies concerning development within and adjacent to ESHA. The project is primarily sited and designed to avoid adjacent ESHAs, including single-parameter wetlands, to the extent feasible, and in compliance with Policy 6-12, Development Alternatives.
- Policy 6-13 allows pre-existing uses to continue within and adjacent to ESHA, provided that changes to the project site that constitute new development are sited and designed to avoid new impacts to ESHA and to avoid any increases to existing non-conformities. The project work within the mapped terrestrial ESHA will be limited to installation of a pedestrian trail and fenced dog park within what is potential upland dispersal habitat for the CRLF and SFGS, and potential winter foraging habitat for raptors and short-eared owl. The proposed development is not anticipated to create a barrier to CRLF or SFGS dispersal or significantly impact upland dispersal habitat or significantly impact winter foraging habitat for raptors. The project avoids all single-parameter wetlands. Therefore, the project would be compatible with Policy 6-13, Pre-Existing Development and ESHA.
- Policy 6-16 identifies permitted uses in terrestrial ESHA and ESHA buffers, which includes low-intensity public access and recreation such as the fenced dog park and nature trail. Therefore, the project would be compatible with Policy 6-16, Permitted Uses in Terrestrial ESHA and Terrestrial ESHA Buffers.
- Policy 6-18 requires new construction to be sited and designed to avoid adverse impacts to ESHA, including the use of raised boardwalks, informative signage, and exclusion fencing where appropriate. The project includes a raised boardwalk path between the small parking area near the children's playground to Fields 4 and 5 to avoid one wetland. The nature trail would extend into ESHA for CRLF and SFGS dispersal habitat and potential ESHA for overwintering raptors; however, the proposed development is not expected to significantly impact ESHA and the project would include informative signage explaining that all dogs must be kept on leash on the nature path to protect wildlife. Therefore, the project would be compatible with Policy 6-18, Standards in Terrestrial ESHA and Terrestrial ESHA Buffers.
- Policy 6-41 creates a 100-foot buffer zone for wetlands, and the new nature path would be within this zone. However, Policy 6-40 identifies public trails as a permitted use within wetlands, and the project is designed to avoid all single parameter wetlands. The pedestrian nature trail would be a low-impact use that is compatible with the continued viability of adjacent wetlands. Therefore, the nature trail would be compatible with Policies 6-40, Permitted Uses in Wetlands, and 6-41, Wetland Buffer Zones.

⁹⁸ City of Half Moon Bay. 2020. *City of Half Moon Bay Local Coastal Land Use Plan 2020 Comprehensive Update*. October 20. Available at <https://www.half-moon-bay.ca.us/DocumentCenter/View/3784/Full-Combined-2020-HMB-LCLUP>. Accessed December 11, 2021

- The new nature trail would be sited and designed to minimize impacts to ESHA, using signage and limited fencing as necessary to protect wetlands in compliance with Policy 6-58, Public and Recreational Access.
- The nature trail and entrance to the Wavecrest Open Space would include interpretive signage to provide information about the habitat value and need to protect sensitive resources in compliance with Policy 6-59, Interpretive Signage.
- Lighting for Field 3 would be shielded and directed onto Field 3 and away from surrounding habitat in compliance with Policy 6-62, Exterior Lighting and ESHA.

The project is consistent with City planning decisions and documents and would implement the recommendations for Smith Field Park improvements in both the *Half Moon Bay Parks Master Plan* and the *Smith Field Park Master Facilities Plan*.^{99,100}

The project includes new trailhead facilities at the southwestern corner of the park, including signage, a kiosk, trash receptacles, a dog station with dog waste bags and a dog fountain, and a protected place for gathering.

The project site is surrounded by several seasonal wetlands and one minor intermittent stormwater drainage ditch known as the Wavecrest Watercourse. Per the 2020 LCLUP, the seasonal wetlands are considered ESHAs.¹⁰¹ The project has been designed to avoid and protect all wetland areas.

Operationally, the project would improve recreational facilities. The addition of picnic, barbeque, and playground areas and the expanded dog park, along with the installation of ADA-compliant parking and access, would expand recreational uses to better serve the residents of the coast. It would not impede coastal access, damage wetlands or terrestrial ESHAs, or otherwise conflict with any other environmental policy expressed in the 2020 LCLUP. Additionally, the project would remain a public park and would not conflict with the existing and surrounding uses. Therefore, no operational impacts would occur. Overall, the impacts to land use and planning would be less than significant.

3.12 Mineral Resources

Environmental Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<i>Would the project:</i>				
(a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒
(b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐	☒

⁹⁹ City of Half Moon Bay. 2019. *Half Moon Bay Parks Master Plan*. January. Available at: https://www.half-moon-bay.ca.us/DocumentCenter/View/2161/Final-Master-Plan_12419v6. Accessed December 11, 2024.

¹⁰⁰ City of Half Moon Bay. 2022. *Smith Field Park Master Facilities Plan*. Available at: <https://www.half-moon-bay.ca.us/822/smith-field-parks-master-plan>. Accessed December 11, 2024.

¹⁰¹ City of Half Moon Bay 2020. *City of Half Moon Bay Local Coastal Land Use Plan 2020 Comprehensive Update, Chapter 6: Natural Resources*. October 20. Available at <https://www.half-moon-bay.ca.us/154/Local-Coastal-Program-Land-Use-Plan>. Accessed December 11, 2024.

Environmental Evaluation

a. Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

A significant impact may occur if a project site is located in an area used or available for extraction of a regionally important mineral resource, if a project would convert an existing or future regionally important mineral extraction use to another use, or if a project would affect access to a site used or potentially available for regionally important mineral resource extraction.

The project site is located in an area designated (zoned) by the State as Mineral Resource Zone (MRZ)-3 for aggregate mineral resources.¹⁰² MRZ-3 is defined as an area containing mineral deposits, the significance of which cannot be evaluated from available data. Neither the project site nor the surrounding area is identified as an area containing mineral deposits of statewide or regional significance. The closest identified aggregate resource section is at Pilarcitos Quarry, approximately 3.8 miles northeast, off Highway 92. Therefore, no impacts to mineral resources of statewide or regional significance would occur.

b. Would the project result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

A significant impact would occur if a project were located in an area used or available for extraction of a locally important mineral resource and the project converted an existing or potential future locally important mineral extraction use to another use, or if a project affected access to a site in use or potentially available for locally important mineral resource extraction.

Neither the project site nor the surrounding area is identified as an area containing mineral deposits of local significance.¹⁰³ Therefore, no impacts to mineral resources of local significance would occur.

3.13 Noise

Environmental Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<i>Would the project:</i>				
(a) Result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☒	☐
(b) Result in generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐

¹⁰² California Department of Mines and Geology (CDMG). 1996. Generalized Mineral Land Classification Map of the South San Francisco Bay Production-Consumption Region, Half Moon Bay Quadrangle. Open File Report 96-03, Plate 1. By Susan Kohler-Antiblin. Available at: <https://maps.conservation.ca.gov/cgs/informationwarehouse/index.html?map=mlc>. Accessed December 16, 2024.

¹⁰³ City of Half Moon Bay. 2014. *Plan Half Moon Bay: Existing Conditions, Trends, and Opportunities Assessment*. Revised July. Available at: <https://www.half-moon-bay.ca.us/DocumentCenter/View/174/HMB-Existing-Conditions-Report-PDF>. Accessed December 16, 2024.

Environmental Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
(c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

Environmental Evaluation

a. Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Construction

Noise impacts resulting from construction depend on the noise generated by various pieces of construction equipment, the timing and duration of noise-generating activities, and the distance between construction noise sources and noise-sensitive areas. Construction noise impacts primarily result when construction activities occur during noise-sensitive times of the day (e.g., early morning, evening, or nighttime hours), the construction occurs in areas immediately adjoining noise-sensitive land uses, or when construction lasts over extended periods of time.

The residential uses north, east, and southeast of the project area represent the majority of the sensitive receptors in the vicinity of the project site. The nearest residences are on Seymour Street and Highway 1 and are approximately 0.3 miles from the project site. The Aristocrat Hotel is located approximately 100 feet south of the new water line and 1,400 feet east of Smith Field Park. The Half Moon Bay RV Park is located approximately 200 feet south of the new water line and 630 feet east of Smith Field Park. Other sensitive receptors include users (hikers, dog walkers and birdwatchers) of Wavecrest Open Space adjacent to the project site and users of the California Coastal Trail approximately 0.3 miles west of the project site.

The City has established restrictions limiting construction and similar noise-generating activities from 7:00 a.m. to 6:00 p.m., Monday through Friday; 8:00 a.m. to 6:00 p.m., Saturdays; and 10:00 a.m. to 6:00 p.m., Sundays and holidays. The City Engineer may approve exceptions to these hours, if necessary, to facilitate the orderly completion of work and minimize disruption to the community.¹⁰⁴ The project contractor would be required to comply with construction hour restrictions.

Construction activities would generate noise that would vary over the approximately 6-month Phase 1 construction period and would include equipment such as excavators, dozers, compactors, pavers, backhoes, graders, delivery trucks, concrete trucks, dump trucks, asphalt trucks, a cement mixer, a scraper, a backhoe, a forklift, a steel drum roller, a water truck, and hand tools such as saws and hammers. Additionally, there would be secondary noise from construction worker vehicles and vendor deliveries. During construction, noise-generating activities would be limited to the allowable hours in the

¹⁰⁴ City of Half Moon Bay. 2019. *Half Moon Bay Municipal Code, Chapter 14.40: Hours of Construction*. Available at: <https://www.codepublishing.com/CA/HalfMoonBay/#1/HalfMoonBay14/HalfMoonBay1440.html#14.40>. Accessed December 16, 2021.

City's noise ordinance—8:00 a.m. to 6:00 p.m., Monday through Saturday—and no construction would be allowed on Sundays and holidays unless expressly authorized by the City. Construction-related mobilization and staging may commence no earlier than 7:00 a.m. and cease no later than 7:00 p.m. No nighttime construction would occur. Because construction noise would comply with local noise regulations, impacts related to construction noise would be less than significant.

To the extent feasible, the project would implement the BMPs in Mitigation Measure NOI-1 to further reduce construction noise and further reduce this less-than-significant impact. Implementation of Mitigation Measure NOI-1 would further reduce construction noise levels from the project site and minimize disruption and annoyance to neighboring residents and recreational users. Implementation of these measures, and recognizing that noise generated by construction activities would occur over a temporary period, would further reduce this less-than-significant impact from the temporary increase in ambient noise levels.

Operation

Operational noise from personal vehicles and sounds generated by recreational users would not change from existing conditions. The project site would continue to support softball, baseball, soccer, and other sports, as well as dog park users. In addition, the park would add a children's play area and new picnic facilities, which may draw incrementally more users. The amount of vehicle traffic would be unlikely to change appreciably, and the newly paved parking lot would result in quieter vehicle movement. Therefore, the permanent noise level increase due to the project-generated traffic would be similar to the noise level of existing traffic at Smith Field Park. The proposed project would not cause a substantial permanent noise level increase at the nearby noise-sensitive receptors, and, with implementation of Mitigation Measure NOI-1, impacts would be less than significant with mitigation incorporated.

Mitigation Measures

- NOI-1 Construction Noise Best Management Practices.** The noise impacts of construction equipment may be minimized through modification of the equipment, through the placement of equipment on the project site, and by imposing constraints on equipment operations. Construction equipment should be well-maintained and used judiciously to be as quiet as possible. The project proponent shall include the following best management practices in all contracts related to project construction activities near sensitive land uses:
- a. Equip all internal combustion engine-driven equipment with intake and exhaust mufflers that are in good condition and appropriate for the equipment.
 - b. Unnecessary idling of internal combustion engines should be strictly prohibited.
 - c. Locate stationary noise-generating equipment, such as air compressors or portable power generators, as far as possible from sensitive receptors as feasible. If equipment must be located near receptors, adequate muffling (with enclosures where feasible and appropriate) shall be used to reduce noise levels at the adjacent sensitive receptors. Any enclosure openings or venting shall face away from sensitive receptors.
 - d. Use "quiet" air compressors and other stationary noise sources where technology exists.
 - e. Establish construction staging areas at locations that will create the greatest distance between the construction-related noise sources and noise-sensitive receptors nearest the project site during all project construction.

- f. Locate material stockpiles, as well as maintenance/equipment staging and parking areas, as far as feasible from residential receptors.
- g. Control noise from construction workers' radios to a point where they are not audible at existing residences bordering the project site.
- h. Notify all adjacent business, residences, and other noise-sensitive land uses of the construction schedule, in writing, and provide a written schedule of "noisy" construction activities to the adjacent land uses and nearby residences.
- i. Designate a "disturbance coordinator" who would be responsible for responding to any complaints about construction noise. The disturbance coordinator will determine the cause of the noise complaint (e.g., bad muffler) and will require that reasonable measures be implemented to correct the problem. Conspicuously post a telephone number for the disturbance coordinator at the construction site and include it in the notice sent to neighbors regarding the construction schedule.

b. Would the project result in generation of excessive groundborne vibration or groundborne noise levels?

Construction activities (e.g., ground-disturbing activities, including movement of heavy construction equipment and hauling of debris and soil to and from the project site) may generate localized groundborne vibration and noise. Blasting or pile-driving activities would not occur during construction of the project. Generally, construction-related groundborne vibration is not expected to extend beyond 25 feet from the generating source. Construction activities include road construction, paving, building construction, and installing new recreational equipment. Construction equipment for the parking lot could include a compactor machine (vibratory pad or drum roller). The closest sensitive receptors are the RV park approximately 200 feet from the new water line and 630 feet east of Smith Field Park, one residence 530 feet north of the water line, and residences approximately 0.3 miles from the western edge of the project area. Based on the distance of more than 25 feet to sensitive receptors, groundborne vibration from on-site construction is not anticipated for residences and other sensitive receptors. Hauling of soils and debris could generate vibrations along local haul routes. The project is anticipated to require a total of approximately 3,000 round-trip trucks trips over both phases of the project. The project would be required to adhere to the City Noise Ordinance as a standard COA. Therefore, any annoyance to residents along local haul routes would be short term and temporary, and construction impacts related to groundborne noise or vibration would be less than significant.

Parks do not include significant sources of groundborne noise or vibration, so no operational impacts would occur. Overall, the project will have less-than-significant noise impacts, and Mitigation Measure NOI-1 will be voluntarily implemented by the City during project construction.

c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

The project site is located approximately 4.9 miles from the nearest airport, Half Moon Bay Airport, a facility owned and operated by the County. There is an adopted Airport Land Use Compatibility Plan. The project site is more than 2 miles from the airport and is not subject to Airport Land Use Commission (ALUC) review; therefore, no impact would occur.

3.14 Population and Housing

Environmental Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<i>Would the project:</i>				
(a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☐	☒
(b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

Environmental Evaluation

a. Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

City and County General Plans develop growth plans and projections for the areas in their jurisdiction. A significant impact would occur if a project included a General Plan amendment, which could result in an increase in population over that projected in the adopted General Plan, or if a project would induce substantial unplanned growth on the project site or surrounding area.

Construction job opportunities created as a result of the project are not expected to result in substantial population growth in the area. The work requirements of most construction projects are highly specialized so that construction workers remain at a job site only for the time frame during which their specific skills are needed. Additionally, the construction workers would likely be supplied from the region's labor pool. Construction workers would not be likely to relocate their household as a consequence of working on the project, and as such, significant housing or population impacts would not result from construction of the project. Therefore, there would be no construction-related population growth, and no impact would occur.

The project would construct improvements to an existing park, and therefore, the project is not likely to attract more people to Smith Field Park, Wavecrest Open Space, and the surrounding area such that it would create unplanned population growth in the area. Therefore, the project would not introduce new persons to the population, and no impact would occur.

b. Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

The project would construct improvements to an existing park and is not likely to attract more people to Smith Field Park and the surrounding area. Therefore, the project would not displace people or existing housing, and no impact would occur.

3.15 Public Services

Environmental Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<i>Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:</i>				
(a) Fire protection?	☐	☐	☒	☐
(b) Police protection?	☐	☐	☐	☒
(c) Schools?	☐	☐	☐	☒
(d) Parks?	☐	☐	☒	☐
(e) Other public facilities?	☐	☐	☐	☒

Environmental Evaluation

- a. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection?**

The CFPD currently provides fire protection services for the project site and would continue to serve the project. The CFPD serves Half Moon Bay and the unincorporated Coastsides from south of Half Moon Bay to the community of Montara. The CFPD contracts with CAL FIRE, and CAL FIRE also contracts with the County to provide fire protection services for the area located outside the CFPD boundaries, which includes the communities of Montara, Moss Beach, Princeton-by-the-Sea, El Granada, and Miramar and the surrounding unincorporated areas. The CFPD responds to approximately 2,600 calls for service each year.¹⁰⁵ These incidents include medical aid, fires and fire alarms, water rescue, cliff rescue, traffic accidents, odor investigations, hazardous materials, and public service assists.¹⁰⁶

The project would refurbish and improve park facilities at the existing Smith Field Park; therefore, it would not increase the population in the area or introduce a hazard. A significant impact may occur if the CFPD could not adequately serve a project, and a new or physically altered fire station would be necessary. The CFPD has three fire stations, the nearest of which (Fire Station 40) is at 1191 Main Street, Half Moon Bay, approximately 0.4 miles northeast of the project site. Fire Station 40 is staffed with one fire captain and two fire apparatus engineers and can provide a minimum response time of 2 minutes and

¹⁰⁵ Coastsides Fire Protection District (CFPD). 2023. *2020 Annual Report*. Available at: <https://www.coastsidefire.org/files/2f82a78c4/032421+tab+3+b.+2020+Coastside+Annual+Report.pdf>. Accessed December 16, 2024.

¹⁰⁶ Coastsides Fire Protection District (CFPD). 2023. *2020 Annual Report*. Available at: <https://www.coastsidefire.org/files/2f82a78c4/032421+tab+3+b.+2020+Coastside+Annual+Report.pdf>. Accessed December 16, 2024.

maximum response time of 8 minutes to all portions of the city.^{107,108} The project would improve fire-fighting infrastructure by adding a new water line and hydrants, would meet all CFPD requirements for engine access and turnarounds, and would not increase population or cause a substantial increase in recreational users.

Construction

Construction of the proposed project would increase the potential for accidental on-site fires from sources such as the operation of mechanical equipment and use of flammable construction materials. In most cases, compliance with building and fire codes, including implementation of basic housekeeping procedures (including removal of fuel loads) by the construction contractors and work crews, would minimize these hazards.

Construction activities also have the potential to affect fire protection, such as emergency vehicle response times, by adding construction traffic to the street network and potentially by requiring partial lane closures during street improvements and utility installation on Wavecrest Road.

Construction impacts would require partial lane closures and periodic road closures on Wavecrest Road that would be temporary in nature. The project Contractor would be required to maintain emergency access to Smith Field Park at all times. Wavecrest Road is a dead end road that ends at Smith Field Park; therefore, project construction would not significantly impact emergency vehicle response times. Based on the above information, construction of the proposed project would not be expected to substantially increase fire risks or temporarily increase firefighting and emergency service response times. Therefore, potential impacts to fire services during construction would be less than significant.

Operation

The project would replace and upgrade existing park facilities, including the parking lots, ballfields, and dog park, and add a walking trail, playground, and picnic facilities; therefore, it would not increase the population in the area or introduce a hazard. A significant impact may occur if the CFPD could not adequately serve a project, and a new or physically altered fire station would be necessary. The CFPD has three fire stations. The project site is in the response area for Fire Station 40, which is located at 1191 Main Street, approximately 0.4 miles northeast of the project site. The project would not increase population or cause a marked increase in recreational users, and no impact to fire protection services would occur.

The CFPD would have adequate response times to the project site and surrounding vicinity; no additional fire personnel or equipment would be necessary to serve the project. The project would not physically alter existing fire protection facilities, nor require the construction of new facilities. In addition, the project site is located within an urban, built-up area of San Mateo County with adequate response times and infrastructure; thus, the project would not significantly increase the demand for fire protection services. Therefore, buildout of the project site is not expected to increase exposure and vulnerability to wildfire hazard, and this impact would be less than significant.

Based on the above information, implementation of the project would not be expected to overload firefighting and emergency services to the extent that there would be a need for new, expanded,

¹⁰⁷ Coastside Fire Protection District (CFPD). 2008. About Us. Available at: <https://www.coastsidefire.org/about-us>. Accessed December 16, 2024.

¹⁰⁸ City of Half Moon Bay. 2020. *City of Half Moon Bay Local Coastal Land Use Plan 2020 Comprehensive Update, Chapter 7: Environmental Hazards*. October 20. Available at <https://www.half-moon-bay.ca.us/DocumentCenter/View/3784/Full-Combined-2020-HMB-LCLUP>. Accessed December 16, 2024.

consolidated, or relocated fire facilities. Therefore, potential impacts to fire services would be less than significant, and no mitigation measures are required.

b. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection?

Law enforcement services are provided citywide by the San Mateo County Sheriff's Department (Sheriff's Department) through a contract with the City. The contract includes staffing necessary to serve all properties and residents located within the City limits. Sheriff Department staff includes a captain, who serves as the City-designated Chief of Police Services; sergeants; and a minimum of two patrol deputies at any given time within City limits. City contract staff are part of the Coastside Patrol Bureau of the Sheriff's Department. City services are provided through the substation located at 537 Kelly Avenue, Half Moon Bay. Unincorporated services and support to the City are provided via a second substation located at 500 California Avenue, Moss Beach.

Patrol services in the vicinity of the proposed project would be provided by the Coastside Patrol Bureau, based at the Half Moon Bay substation on Kelly Avenue, approximately 1.2 miles northeast of the project site. The Coastside Patrol Bureau is typically staffed with 27 full-time deputy sheriffs, four sergeants, and one captain. Under the current contract, the captain is principally committed to the City (75% allocation). The Coastside Patrol Bureau is staffed with sufficient resources to respond on a 24-hour basis to any emergency. Additionally, two full-time community policing deputies are assigned to address the needs of the community, including both law enforcement and quality-of-life issues.¹⁰⁹

The project would refurbish and upgrade existing park facilities, including the parking lots, ballfields, and dog park, and add a walking trail, playground, and picnic facilities; therefore, it would not increase the population in the area or introduce any conditions that would necessitate an increase in police services. The project would not cause an appreciable increase in recreational users. The project would not increase the demand for public services, including police protection, and no impact to police protection would occur.

c. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for schools?

The project area is served by the Cabrillo Unified School District (CUSD). A significant impact may occur if the CUSD could not adequately serve a project, and a new or physically altered school or schools would be necessary.

The project would refurbish and upgrade existing park facilities, including the parking lots, ballfields, and dog park, and add a walking trail, playground, and picnic facilities; therefore, it would not increase the

¹⁰⁹ San Mateo County Sheriff's Department. 2023. Coastside Patrol Bureau. Available at: <https://www.smcsheriff.com/patrol-services/coastside-patrol-bureau>. Accessed December 16, 2023.

population in the area or introduce new students to the community. The project would not increase the demand for public services, including schools, and no impact to schools would occur.

d. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for parks?

Parks and recreation facilities in the project area include parks and trails operated by the City (Half Moon Bay Coastal Trail, Frenchman's Creek Park, Kehoe Park, Carter Park, Fernandez Park, Mac Dutra Plaza, Oak Avenue Park, Ocean View Park, Skate Park, and Smith Field Park), the County Parks Department (Pillar Point Bluff, Quarry Park, Mirada Surf, Moss Beach Park, Fitzgerald Marine Reserve, and Devil's Slide Trail are located between Half Moon Bay and Montara; and Tunitas Creek Beach, Memorial Park, Pescadero Creek Park, and Sam McDonald Park are located south of the City),¹¹⁰ the California Department of Parks and Recreation (Half Moon Bay State Beach, including Dunes, Roosevelt, and Venice beaches; Montara State Beach and Gray Whale Cove State Beach to the north; and Burleigh H. Murray Ranch, Cowell Ranch State Beach, Año Nuevo State Park, and Big Basin Redwoods State Park to the south),¹¹¹ and the Midpeninsula Regional Open Space District (Purisima Creek Redwoods, Skyline Ridge, and La Honda Creek Preserves on or near the coast).¹¹²

The City completed the *Half Moon Bay Parks Master Plan* in January 2019, which recommended upgrades to Smith Field Park. The Master Plan provides planning for a 15-year period (2018–2033).¹¹³ In addition, the City completed a *Smith Field Park Master Facilities Plan* in July 2022, which included public outreach and discussion and recommended improvements to the park.¹¹⁴ This project implements many of those improvements.

The project would construct improvements to new park facilities and has been designed to avoid significant environmental impacts. The project avoids ESHAs, including adjacent wetlands, and improves stormwater retention and runoff, ADA and emergency access, and the access point and signage for Wavecrest Open Space. The project would not be likely to significantly increase the number of users at Smith Field Park. Therefore, it would not represent a substantial increase in the use of parks or other recreational facilities or cause significant environmental impacts, and this impact would be less than significant.

¹¹⁰ County of San Mateo Parks Department. 2021. County Parks by Location. Available at: <https://parks.smcgov.org/county-parks>. Accessed December 16, 2024.

¹¹¹ California Department of Parks and Recreation. 2024. Find a California State Park. Available at: <https://www.parks.ca.gov/Find-a-Park>. Accessed December 16, 2024.

¹¹² Midpeninsula Open Space Trust. 2024. Find an Open Space Preserve. Available at: <https://www.openspace.org/preserves>. Accessed December 16, 2024.

¹¹³ City of Half Moon Bay. 2019. *Half Moon Bay Parks Master Plan*. January. Available at: https://www.half-moon-bay.ca.us/DocumentCenter/View/2161/Final-Master-Plan_12419v6. Accessed December 16, 2024.

¹¹⁴ City of Half Moon Bay. 2022. *Smith Field Park Master Facilities Plan*. Available at: <https://www.half-moon-bay.ca.us/DocumentCenter/View/5039/2022-07-18-Smith-Field-Park-Master-Facilities-Plan-Booklet?bidId=>. Accessed December 16, 2024.

e. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for other public facilities?

A significant impact may occur if the project would result in the need for other new or improved public facilities. Other public facilities include the Half Moon Bay Library, which is part of the San Mateo County Libraries system. The Half Moon Bay Library, rebuilt in 2018, is a 22,000-square-foot facility that serves a 270-square-mile area. The new library provides both physical and digital collections from the San Mateo County Libraries system; technology services, including three-dimensional (3D) printing; free Wi-Fi hotspots; multilingual collections; literacy services; online high school; and space for community programs and events.¹¹⁵

The project would refurbish and upgrade existing park facilities, including the parking lots, ballfields, and dog park, and add a walking trail, playground, and picnic facilities; therefore, it would not increase the population in the area or introduce new people to the community. The project would not increase the demand for public services, including libraries, and no impact to libraries would occur.

3.16 Recreation

Environmental Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
(a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☒	☐
(b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☒	☐

Environmental Evaluation

a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

A project would result in a significant impact to parks and recreation services if it would result in a significant increase in population from adding residential units, which would add residents that would be using public recreational facilities. The project would improve and upgrade existing park facilities and would not increase the population in the area or cause a substantial increase in recreational users. The project would supplement the existing Smith Field Park facility by adding a playground and picnic facilities and expanding the dog park, but would remove the horseshoe pits, which would remove some

¹¹⁵ City of Half Moon Bay. 2024. Half Moon Bay Library. Available at: <https://www.half-moon-bay.ca.us/322/Library>. Accessed December 16, 2024.

users. The project would not increase the population and would not cause substantial physical deterioration of city parks; therefore, this impact would be less than significant.

b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

The project would refurbish and improve existing park facilities; therefore, it would not increase the population in the area but would improve the park experience and could result in a slight increase in recreational users. Although the project would add improvements to an existing recreational facility, it would not have a significant, adverse physical effect on the environment. As discussed in Section 3.3, *Air Quality*; Section 3.4, *Biological Resources*; Section 3.5, *Cultural Resources*, Section 3.7, *Geology and Soils*; Section 3.10, *Hydrology and Water Quality*, and 3.18, *Tribal Cultural Resources*, all potentially significant impacts would be reduced to a less-than-significant level by mitigation incorporated into the project. The project would allow the City to expand recreational features available at Smith Field Park, but the project would not change the operational impacts of the existing park; therefore, this impact would be less than significant.

3.17 Traffic and Circulation

Environmental Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<i>Would the project:</i>				
(a) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☐	☐	☒
(b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	☐	☐	☒	☐
(c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☐	☒
(d) Result in inadequate emergency access?	☐	☐	☒	☐

Environmental Evaluation

REGIONAL AND LOCAL ACCESS

Regional access is provided by Highways 1 and 92; Highway 1 is located approximately 200 feet east of the project. Highways 1 and 92 are the only roads that provide connections from Half Moon Bay to other parts of the county. Local access is provided by Wavcrest Road. Traffic on Highways 1 and 92 can be congested during peak hours, including AM and PM rush hours on weekdays and tourist traffic on weekends.

PUBLIC TRANSIT

The project site is served by San Mateo County Transit District (SamTrans) Bus Routes 15 and 117, which have a stop approximately 0.33 mile east of Smith Field Park at Highway 1 and Wavcrest Road.

The bus routes offer connections within the city of Half Moon Bay (both routes), to Linda Mar in the city of Pacifica (via Bus Route 117), and south to Moonridge Apartments (via Bus Route 15).¹¹⁶

PEDESTRIAN/BICYCLE TRANSIT

The City's existing multi-use trails, including the California Coastal Trail, Naomi Patridge Trail, and Pilarcitos Creek Trail, provide linkages that support coastal access for bicyclists and pedestrians. The project site is approximately 0.33 miles west of the Naomi Patridge Trail, which is a multi-use trail that parallels Highway 1. The Naomi Patridge Trail is currently approximately 3.4 miles long and extends from Wavecrest Road in the south to Ruisseau Francais Avenue in the north on the west side of Highway 1, and from Ruisseau Francais Avenue to Roosevelt Boulevard on the east side.^{117,118}

In addition to the Naomi Patridge Trail, the project is approximately 0.3 miles east of the 11.5-mile California Coastal Trail, a paved, Class 1 multi-use path that extends from Seymour Bridge 4.7 miles north to Pillar Point Harbor. An additional, partially paved segment of the trail extends approximately 2 miles south from Seymour Bridge through the Wavecrest Open Space to the Ritz Carlton Hotel. In the south, the multi-use path connects to the Cowell-Purisima Coastal Trail, an additional 3.6-mile segment of the California Coastal Trail.¹¹⁹

a. Would the project conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

The project would replace and upgrade existing park facilities, including the parking lots, ballfields, and dog park; add a walking trail, playground, and picnic facilities; and remove the horseshoe pits. Therefore, the project would not increase the population in the area but would improve the park experience and allow for a slight increase in recreational users. Although the project would add improvements to an existing recreational facility, it would not substantially increase the numbers of park users or VMT. The project is within 0.5 miles of a transit stop, the Naomi Patridge Trail (via Wavecrest Road), and the Coastsides Trail (via Wavecrest Open Space). Therefore, operation of the project would not conflict with any plan, ordinance, or policy related to transportation, and no impact would occur.

Project construction would result in worker vehicle trips, haul trips, and vendor trips. The tree removal, cut and fill, and importation of materials would generate a total of about 3,000 haul trips over both phases of the project. The increase in traffic as a result of worker vehicle and haul trips would negligibly increase traffic at nearby traffic intersections and roadway segments and would not conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness. In addition, haul and vendor trips would primarily occur during off-peak hours (9:00 a.m.–3:00 p.m.). Therefore, the project would not conflict with a program plan, ordinance, or policy, and no impact would occur.

¹¹⁶ San Mateo County Transit District (SamTrans). 2024. Schedule and Maps. Available at: <https://www.samtrans.com/service-info/coastside-services>. Accessed December 16, 2024.

¹¹⁷ City of Half Moon Bay. 2020. *City of Half Moon Bay Local Coastal Land Use Plan 2020 Comprehensive Update, Chapter 2.3: Coastal Access and Recreation*. October 20. Available at <https://www.half-moon-bay.ca.us/DocumentCenter/View/2337/Chapter-23-Coastal-Access-and-Recreation>. Accessed December 16, 2024.

¹¹⁸ City of Half Moon Bay. 2019. *City of Half Moon Bay Bicycle and Pedestrian Master Plan*. Available at: <https://www.half-moon-bay.ca.us/DocumentCenter/View/2243/Bicycle-and-Pedestrian-Master-Plan-Final?bidId=>. Accessed December 16, 2024.

¹¹⁹ Peninsula Open Space Trust (POST). 2020. Cowell-Purisima Coastal Trail. Available at: <https://openspacetrust.org/hike/cowell-purisima-trail/>. Accessed December 16, 2024.

b. Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

Under the 2019 revisions to the State CEQA Guidelines, changes to Levels of Service are no longer identified as an impact under CEQA. The new 2019 State CEQA Guidelines require analysis of impacts related to VMT as a result of a project. VMT is the amount and distance of automobile traffic attributable to a project.

State CEQA Guidelines Section 15064.3 includes criteria for analyzing transportation impacts. State CEQA Guidelines Section 15064.3(b)(3) allows for a lead agency to complete a qualitative analysis of VMT impacts, as follows, for transportation projects:

Qualitative Analysis. If existing models or methods are not available to estimate the vehicle miles traveled for the particular project being considered, a lead agency may analyze the project's vehicle miles traveled qualitatively. Such a qualitative analysis would evaluate factors such as the availability of transit, proximity to other destinations, etc. For many projects, a qualitative analysis of construction traffic may be appropriate.

Construction of the proposed project will generate vehicle trips associated with hauling equipment and materials to and from the project site, as well as trips associated with construction worker travel to and from the project site. The number of trips would vary based on the phase and duration of the construction activities, and would be generated by activities involving tree removal, cut and fill, and importation of materials. Over the course of both phases of construction (6 months for Phase 1 and approximately 12 months for Phase 2), the project would generate a total of about 3,000 haul trips spread out over time. The scale and intensity of the proposed project would not be expected to result in a substantial number of vehicle trips on a daily basis due to construction activities being spread out through the overall project construction period. In addition, these trips are temporary in nature and would cease upon completion of the proposed project. Therefore, construction period vehicle trips would not result in a permanent VMT increase compared to existing conditions. As a result, the proposed project would have a less-than-significant VMT impact during construction.

The project would refurbish and upgrade existing park facilities, including the parking lots, ballfields, and dog park; add a walking trail, playground, and picnic facilities; and remove the horseshoe pits. Therefore, the project would not create a substantial increase in users and is not expected to create a measurable difference in operational VMT between existing conditions and future conditions once the project improvements have been implemented. Small projects, those that generate or attract fewer than 110 trips per day, generally may be assumed to cause a less-than-significant transportation impact.¹²⁰ The project would upgrade facilities at an existing park and would be unlikely to significantly change park use or VMT by park users, therefore it would be unlikely to generate or attract 110 additional trips per day. Although the project would add improvements to an existing recreational facility it would not substantially increase the numbers of park users or VMT. Therefore, the project would be consistent with State CEQA Guidelines Section 15064.3(b), and this impact would be less than significant.

c. Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

The project does not include any design features that would increase hazards. Paving the parking lot and widening the road at the entrance to the park would reduce traffic hazards. The project would add an

¹²⁰ California Governor's Office of Planning and Research. 2018. *Technical Advisory: On Evaluating Transportation Impacts in CEQA*, p. 12. Available at: https://lci.ca.gov/ceqa/docs/20190122-743_Technical_Advisory.pdf. Accessed April 3, 2025.

access road to Fields 4 and 5 with an emergency turnaround that meets CFPD requirements. Therefore, the project would not increase hazards, and no impact would occur.

d. Would the project result in inadequate emergency access?

A significant impact may occur if a project were to interfere with roadway operations used for emergency access or evacuation or would generate sufficient traffic to create traffic congestion that would interfere with the emergency access.

The project would be accessed via Wavecrest Road. The project would pave the parking lot and add an access road and emergency turnaround at Field 5 that would meet CFPD requirements. The project has been reviewed and approved by the CFPD. Therefore, operation of the project does not have any elements that would result in inadequate emergency service, and no impact would occur.

Project construction would result in traffic interruptions on Wavecrest Road during installation of the new water line. In addition, the tree removal, cut and fill, and importation of materials would generate a total of about 3,000 haul trips over both phases of the project. The increase in traffic as a result of worker vehicles and haul trips would increase traffic at nearby traffic intersections and roadway segments. As required by the City, the project would be required to implement a traffic mitigation plan. In addition, haul and vendor trips would primarily occur during off-peak hours (9:00 a.m.–3:00 p.m.). Therefore, the project would not conflict with a program plan, ordinance, or policy, and no impact would occur.

During short-term construction activities, including the associated roadway improvements and installation of the water line, partial or complete road closures may be required along Wavecrest Road to accommodate utility trenching and paving. Closures would not impact individual access to other properties.

During the construction phase, the City would require an encroachment permit for any temporary activities that would affect the public right-of-way. Encroachment permit conditions would include a traffic control plan with temporary procedures for emergency access. Therefore, the project would not result in inadequate emergency service, and this impact would be less than significant.

3.18 Tribal Cultural Resources

Environmental Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
(a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
(i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	☐	☐	☒	☐

Environmental Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
(ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☐	☒	☐

Environmental Evaluation

a. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

- i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?**
- ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?**

Tribal cultural resources are defined as sites, features, places, cultural landscapes, sacred places and objects with cultural value to a California Native American tribe that are either included or eligible for inclusion in the CRHR or included in a local register of historical resources, or a resource determined by the lead agency to be significant. Historical resources, unique archaeological resources, or non-unique archaeological resources may also be tribal cultural resources if they meet these criteria.

A search of the Native American Heritage Commission Sacred Lands Files revealed no previously recorded tribal cultural resources in the project area. The Native American Heritage Commission also identified eight tribes potentially having interest in this project, and these tribes were contacted by SWCA in 2023. Chairperson Zwierlein of the Amah Mutsun Tribal Band of Mission San Juan Bautista indicated that the project area is a hotspot for prehistoric materials and requested that cultural sensitivity training be provided to all employees prior to the initiation of work, but no tribal cultural resources were identified for the project site.

Under Assembly Bill (AB) 52, Native American correspondence and tribal consultation for the project was initiated by the City and will be completed prior to the public hearing. To date, there has been no additional response from tribal representatives regarding AB 52 consultation, and there are no known tribal cultural resources within the project area.

As discussed in Section 3.5, *Cultural Resources*, the archaeological field survey conducted by SWCA did not identify any prehistoric or historic archaeological resources. In the event of an accidental discovery, the project Contractor would implement the City's Standard Condition for discovery. Prior to the initiation of project activities, an environmental awareness training will be presented by a qualified archaeologist (Mitigation Measure CUL-1). The training will detail the types of cultural resources and tribal cultural resources that may be encountered, as well as procedures to occur in the event of accidental discovery.

Potential impacts to tribal cultural resources would be considered less than significant with the implementation of the City's Standard Condition for discovery. Implementation of Mitigation Measure CUL-1 would further reduce this less-than-significant impact.

3.19 Utilities and Service Systems

Environmental Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<i>Would the project:</i>				
(a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐
(b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☒	☐
(c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐
(d) Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
(e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☐	☒

Environmental Evaluation

a. Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

Water

Water for project construction and operation is supplied by the CCWD, which obtains its water supply from four sources. Water contained in Pilarcitos Lake and Crystal Springs Reservoir is purchased from the San Francisco Public Utilities Commission (SFPUC), and local water supplies are drawn from

Pilarcitos Well Field and the Denniston Project (well and surface water). The CCWD serves 18,890 people in a 14-square-mile area, which has an average demand of 1.32 million gallons per day (mgd).¹²¹ The CCWD has an Individual Supply Guarantee of 2.175 mgd, or approximately 794 million gallons per year, from the SFPUC, and purchases an average of 511 million gallons per year. In addition to the water from the SFPUC, CCWD obtains approximately 256 million gallons per year, or 0.70 mgd, from local sources during a non-drought year.¹²² In 2022 to 2023, per capita use in the district was approximately 42.5 and 70 gallons per capita per day for residential and gross per capita water uses, respectively.¹²³

Construction

Construction activities would require a minimal amount of water for dust control and cement mixing. Water would be delivered to the project site by water truck.

Operation

The project includes replacement of a 2-inch water line and water tank with an 8-inch water line, which will be sized to provide adequate pressure for potable and fire use. Water use at the project site is not expected to change appreciably. Replacement of natural turf with artificial turf on Field 3 may slightly decrease water use. Existing irrigation, restroom and concession stand water use is expected to remain the same. The project would include additional restrooms, water fountains, and dog water fountains, which would slightly increase water use, and all new water fixtures will meet current water conservation standards.

Wastewater

Wastewater collection is provided by the City and treatment is provided by SAM operating under a Joint Powers Authority, which receives average dry weather flow of approximately 1.5 mgd. The SAM Wastewater Treatment Plant has capacity to treat up to 4 mgd in average dry weather flow and 15 mgd in peak wet weather flow (which includes infiltration of stormwater). The plant has not experienced flows that reached or exceeded maximum peak wet weather capacity since its expansion in the late 1990s.¹²⁴

Construction

Construction of the project would produce minimal wastewater from construction crew use of portable toilets. Therefore, construction of the project would not result in the relocation or construction of new wastewater treatment facilities, and this impact would be less than significant.

Operation

An existing sewer main is located on the project site, and no new or expanded sewer mains are required as part of the project. Wastewater volumes from Smith Field Park are likely to either stay the same or increase slightly as a result of the project due to the slight increase in additional facilities. Additional restrooms and visitors at the children's playground and picnic area could result in a slight increase in

¹²¹ Bay Area Water Supply and Conservation Agency (BAWSCA). 2024. Coastside County Water District Service Area. Available at: <http://bawasca.org/members/profiles/coastside>. Accessed December 17, 2024.

¹²² Coastside County Water District (CCWD). 2021. *2020 Urban Water Management Plan*. Available at: https://www.coastsidewater.org/reports_and_studies/2020-Urban-Water-Management-Plan.pdf. Accessed June 11, 2024.

¹²³ Bay Area Water Supply and Conservation Agency (BAWSCA). 2024. Per Capita Water Use. Available at: <https://bawasca.org/water/use/percapita>. Accessed December 17, 2024.

¹²⁴ Sewer Authority Mid-Coastside (SAM). 2019. *Sewer System Management Plan*. Available at: https://samcleanswater.org/sam_documents_cpt/sam-sanitary-sewer-management-plan-2019/. Accessed December 17, 2024.

wastewater production; however, the existing infrastructure is adequate to serve the expanded Smith Field Park, and this impact would be less than significant.

Stormwater

The majority of the project site drains to the open fields north of the project, either by overland flow, or via sump pumps in the ballfields. There are no stormwater facilities that currently serve Smith Field Park and no new stormwater facilities are proposed as part of the project.

Construction

The project would be required to implement a SWPPP under State Water Board Construction General Permit Order 2022-0057-DWQ,¹²⁵ Municipal Regional Stormwater NPDES Permit,¹²⁶ and the SMCWPPP.¹²⁷ The SWPPP must include site-specific BMPs that are designed to prevent runoff from construction areas to reduce potential impacts to surface water quality during project construction. The SWPPP would also include design elements and BMPs for construction areas, such as fueling and equipment washing areas, and trash and hazardous material storage areas. Therefore, construction impacts would be less than significant.

Operation

The project would upgrade and improve park facilities and include a total of 83,977 square feet of new impervious surface area, which would drain by force main and overland flow toward the open space field to north. The project will include drainage improvements that meet the requirements of the City's GIP¹²⁸ to prevent sediment-laden runoff. Permanent green infrastructure is anticipated to implement planter-style stormwater basins that would filter contaminants from stormwater runoff. Stormwater in excess of a 10-year, 2-hour storm would flow to the north and empty into the open space fields (see Appendix A). Therefore, the construction of new storm drainage facilities would not create a need for new stormwater facilities, and the operational impacts of the project would be less than significant.

Gas and Electricity

The project is being developed as an all-electric project and no natural gas lines will be constructed to serve the park; therefore, no impact related to natural gas use would occur.

The project would include more efficient lighting for Field 3. The current lighting infrastructure has an electrical load of 57.12 kilovolts (kV). The new lighting equipment would have an electrical load of 49.44 kV, which is a decrease of 7.68 kV. Pacific Gas and Electric Company (PG&E) would supply electricity services to the project site. The project would not require or result in the relocation or construction of new or expanded facilities; therefore, impacts to energy facilities would be less than significant.

¹²⁵ State Water Resources Control Board (State Water Board). 2022. Construction Stormwater Program. Available at: https://www.waterboards.ca.gov/water_issues/programs/stormwater/construction.html. Accessed December 17, 2024.

¹²⁶ San Francisco Regional Water Quality Control Board (RWQCB). 2022. *Municipal Regional Stormwater NPDES Permit*. Order No. R2-2022-0018. NPDES Permit No. CAS612008. California Regional Water Quality Control Board, San Francisco Bay Region. May 11. Available at: https://www.waterboards.ca.gov/sanfranciscobay/board_decisions/adopted_orders/2022/R2-2022-0018.pdf. Accessed December 17, 2024.

¹²⁷ County of San Mateo. 2020. San Mateo Countywide Water Pollution Prevention Program: Construction Best Practices. Available at: <https://www.flowstobay.org/construction>. Accessed December 17, 2024.

¹²⁸ City of Half Moon Bay. 2019. *City of Half Moon Bay Green Infrastructure Plan*. September. Available at: <https://www.half-moon-bay.ca.us/DocumentCenter/View/2305/HalfMoonBayGIPlan09-2019Final1>. Accessed December 17, 2024.

Telecommunications

The project would upgrade existing park facilities and would not extend new telecommunications infrastructure; therefore, no impact would occur.

b. Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?

As required by the California Department of Water Resources (DWR), CCWD has analyzed the long-term reliability and vulnerability of its water supplies and developed a combination of supply alternatives and conservation planning efforts to meet the water supply needs of its customers. CCWD has developed water supply estimates for normal year, single dry year, and multiple dry year scenarios. Table 3.19-1 shows the projected water balance for a normal dry year through 2045. Table 3.19-2 shows the water balance for the first 5 years of a multiple dry year sequence under the *2020 Urban Water Management Plan*.¹²⁹

As shown in Table 3.19-1, CCWD has adequate water supplies to meet a normal year demand. As shown in Table 3.19-2, CCWD's multiple dry year supplies are not adequate to meet projected multiple dry year demands. Significant supply shortfalls, ranging from 22% to 29% in the first year of the 5-year dry period to 53% to 59% in the fifth year of the 5-year dry period, are projected. This shortfall is primarily due to significant cutbacks in CCWD's supply from the SFPUC.

Table 3.19-1. CCWD Water Supply and Demand Estimates for Normal Water Years

Drought Year	Supply/Demand Totals ¹	2025	2030	2035	2040	2045
First Year	Supply Totals	767	760	752	741	741
	Demand Totals ²	704	697	690	668	664
	Difference	63	63	63	74	77

Source: Coastside County Water District (CCWD). 2021. *2020 Urban Water Management Plan, Table 7-12: Normal Year Supply and Demand Comparison (DWR Table 7-2 Retail)*. Available at: https://www.coastsidewater.org/reports_and_studies/2020-Urban-Water-Management-Plan.pdf. Accessed December 17.

¹ All numbers are in million gallons per year.

Table 3.19-2. CCWD Water Supply and Demand Estimates for Multiple Dry Years

Drought Year	Supply/Demand Totals ^{1,2}	2025	2030	2035	2040	2045
First Year	Supply Totals	533	529	522	518	471
	Demand Totals	704	697	690	668	664
	Difference	-171	-168	-168	-150	-193
Second Year	Supply Totals	416	409	405	401	398
	Demand Totals	704	697	690	668	664
	Difference	-288	-288	-285	-267	-266

¹²⁹ Coastside County Water District (CCWD). 2021. *2020 Urban Water Management Plan*. Available at: https://www.coastsidewater.org/reports_and_studies/2020-Urban-Water-Management-Plan.pdf. Accessed December 17, 2024.

Drought Year	Supply/Demand Totals ^{1,2}	2025	2030	2035	2040	2045
Third Year	Supply Totals	376	369	365	361	358
	Demand Totals	704	697	690	668	664
	<i>Difference</i>	-328	-328	-325	-307	-306
Fourth Year	Supply Totals	348	341	337	301	290
	Demand Totals	704	697	690	668	664
	<i>Difference</i>	-356	-356	-353	-367	-374
Fifth Year	Supply Totals	331	324	298	284	273
	Demand Totals	704	697	690	668	664
	<i>Difference</i>	-373	-373	-393	-384	-391

Source: Coastside County Water District (CCWD). 2021. *2020 Urban Water Management Plan, Table 7-18: Multiple Dry Year Supply and Demand Comparison (DWR Table 7-4 Retail)*. Available at: https://www.coastsidewater.org/reports_and_studies/2020-Urban-Water-Management-Plan.pdf. Accessed December 17.

¹ All numbers are in million gallons per year.

² CCWD's multiple dry year demands are assumed to be the same as CCWD's normal year demands.

In Table 3.19-2, CCWD's multiple dry year demands are assumed to be the same as CCWD's normal year demands. However, CCWD has developed a Water Shortage Contingency Plan that includes specific actions to reduce water consumption and losses. Specific actions are triggered by specific percent supply storages and include expanding public information campaigns, restricting landscape irrigation, implementing moratoriums on new connections, implementing drought rate structures or surcharges, increasing water waste patrols, and reducing system water loss. CCWD intends for its Water Shortage Contingency Plan to be an adaptive management plan so that it may assess response action effectiveness and adapt to foreseeable and unforeseeable events. CCWD assumes that under any given stage of water shortage, the identified actions would reduce the supply deficit up to and greater than a 50% shortage.

Construction activities would require a minimal amount of water for dust control and cement mixing. Water would be delivered to the project site by water truck.

The project would add improvements and upgrade Smith Field Park facilities, including additional restrooms and water fountains. However, the project is unlikely to substantially change the water use at the park. The minimal change from existing water use, combined with the City's Water Shortage Contingency Plan, would ensure that impacts related to increased water demand would remain less than significant.

c. Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

As discussed under Impact Discussion 3.19.a, SAM receives average dry weather flow of approximately 1.5 mgd and has a wastewater treatment plant capacity of up to 4 mgd in average dry weather flow.¹³⁰ The project may result in a minimal increase of wastewater production, but not volumes that would materially change the wastewater input to the plant; therefore, impacts related to increased wastewater production would be less than significant.

¹³⁰ Sewer Authority Mid-Coastside (SAM). 2019. *Sewer System Management Plan*. Available at: https://samcleanswater.org/sam_documents_cpt/sam-sanitary-sewer-management-plan-2019/. Accessed December 17, 2024.

d. Would the project generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Solid waste pickup is provided to the project area through a City franchise agreement with Republic Services, which provides pickup of residential and commercial garbage, recyclable material, and organic waste, as well as motor oil, oil filters, and batteries. Republic Services also has drop-off locations for electronic waste and hazardous materials, including medications and paint.¹³¹

Solid waste goes to the Corinda Los Trancos Ox Mountain Sanitary Landfill for recycling, composting, and disposal. The landfill is permitted to receive 3,598 tons of waste per day and has an anticipated closure date of 2034.^{132,133} In the second quarter of 2019, the landfill received an average of 160,253 tons of solid waste (approximately 1,780 tons per day, or 49% of its permitted throughput).

Construction

Construction of the project would require tree removal, clearing and grubbing, soils excavation, and removal of existing base and infrastructure (building materials, fencing, piping, etc.). Cut soils and much of the baserock would be reused on-site. Vegetation and infrastructure would be hauled off-site for composting, recycling, or disposal.

The project Contractor would be required to prepare and submit a Construction and Demolition Waste Management Plan to the City for review and approval. Under the Waste Management Plan, the project contractor would be required to identify types and amounts of materials that could feasibly be reused, salvaged, or recycled and would note the procedures intended to be used. The Waste Management Plan must be approved by the City prior to project construction.¹³⁴ Therefore, impacts related to construction would be less than significant.

The Ox Mountain Landfill has a remaining capacity of approximately 45 million CY and is expected to operate until 2034.¹³⁵ The landfill would accept clean fill for daily cover and would have adequate capacity to serve the construction phase of the project because the construction phase of the project would be temporary and would generate a limited amount of solid waste. Development of the required Waste Management Plan would further reduce the impacts of construction to a less-than-significant impact.

¹³¹ Republic Services. 2021. Republic Services of Half Moon Bay, CA. Available at: <https://www.republicservices.com/municipality/half-moon-bay-ca>. Accessed December 17, 2024.

¹³² Asphalt or concrete construction debris is approximately 2,400 pounds per cubic yard. Dry earth construction debris is approximately 2,100 pounds per cubic yard. Reference: California Department of Resources Recycling and Recovery (CalRecycle). 2018. Estimated Solid Waste Generation Rates. Available at: <https://www2.calrecycle.ca.gov/wastecharacterization/general/rates>. Accessed December 17, 2024.

¹³³ California Department of Resources Recycling and Recovery (CalRecycle). 2024. SWIS Facility Detail. Corinda Los Trancos (Ox Mtn) (41-AA-0002). Available at: <https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/1561?siteID=3223>. Accessed December 17, 2024.

¹³⁴ City of Half Moon Bay. 2019. Half Moon Bay Municipal Code, Chapter 14.50: Requirement for Construction and Demolition Waste Recycling. Available at: <https://www.codepublishing.com/CA/HalfMoonBay/#1/HalfMoonBay14/HalfMoonBay1450.html#14.50>. Accessed December 17, 2024.

¹³⁵ California Department of Resources Recycling and Recovery (CalRecycle). 2024. SWIS Facility Detail. Corinda Los Trancos (Ox Mtn) (41-AA-0002). Available at: <https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/1561?siteID=3223>. Accessed December 17, 2024.

Operation

The addition of picnic facilities may result in an increase in waste production at the park; however, the project would include separate garbage, recycling, and composting receptacles near the new concession stand and picnic areas. Republic Services, the City's current solid waste collection provider, would provide upgraded separate collection bins for each waste stream. As the park currently has two small bins, this would be an improvement over existing conditions. Therefore, the project would not generate waste in excess of the capacity of local infrastructure and would not impair the attainment of solid waste reduction goals. Operational impacts would be less than significant.

e. Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

The City would be required to comply with all federal, State, and local ordinances for water, energy, and waste reduction and management, including, but not limited to, Chapter 14.50, Requirement for Construction and Demolition Waste Recycling of the City's Municipal Code, the Waste Management Plan for construction debris, and the SMCWPPP. Republic Services would provide separate containers and pick up for trash, recycling, and composting. Therefore, the project would comply with all federal, State, and local management and reduction statutes and regulations, and no impact would occur.

3.20 Wildfire

Environmental Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<i>If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:</i>				
(a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
(b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☒	☐
(c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☐	☒
(d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☒

Environmental Evaluation

a. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

A significant impact may occur if a project is located in proximity to wildland areas and would pose a potential fire hazard and could impair evacuation plans in the event of a fire. Smith Field Park is located at the western end of Wavcrest Road in a Local Responsibility Area. It is located in a High Fire Severity

Zone and approximately 400 feet west of a VHFHSZ.¹³⁶ In addition, the project site is located approximately 450 feet west of a WUI.¹³⁷ The project would improve existing park facilities, including paving existing parking facilities, constructing a fire truck turnaround near Field 5, and installing a new water line and hydrants that would comply with CFPD requirements and increase water supply to the area. The project site is approximately 0.38 miles from a fire station. The project has been reviewed by CFPD staff and will be required to comply with CFPD requirements and federal fire codes. Therefore, the project would not impair an adopted emergency response plan or emergency evacuation plan, and no impact would occur.

b. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project, due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

The project area is not located in a VHFHSZ or WUI, although it is 400 feet west of a VHFHSZ and 450 feet west of a WUI.¹³⁸ The project site is relatively flat. The project would include improving and paving the existing parking lot, adding an emergency turnaround near Field 5 and installing a new water line and hydrant that would comply with CFPD requirements. The project would not alter existing park uses or attract significantly more people to the park. Therefore, the project would not exacerbate wildfire risks or expose project users to significant fire hazards, and this impact would be less than significant.

c. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

The project area is not located in a VHFHSZ or a WUI, although it is approximately 400 feet west of a VHFHSZ and 450 feet west of a WUI.¹³⁹ The project site is relatively flat. The project would improve facilities at an existing park, including improving and paving the existing parking lot, adding an emergency turnaround near Field 5, and installing a new water line and hydrant that would comply with CFPD requirements. Therefore, the project would not require the installation of infrastructure that may exacerbate fire risks, and no impact would occur.

¹³⁶ California Department of Forestry and Fire Protection (CAL FIRE). 2025. Local Responsibility Area Fire Hazard Severity Zones. Available at: <https://calfire.app.box.com/s/wahuw9ny7cgn89xpxh7092ur50r1pwvj/file/1785859540511>. Accessed February 26, 2025.

¹³⁷ Association of Bay Area Governments (ABAG). 2024. Wildland-Urban Interface Fire Threat Interactive Map. Available at: <https://mtc.maps.arcgis.com/home/webmap/viewer.html?useExisting=1&layers=d45bf08448354073a26675776f2d09cb&layerId=0>. Accessed December 20, 2024.

¹³⁸ California Department of Forestry and Fire Protection (CAL FIRE). 2025. Local Responsibility Area Fire Hazard Severity Zones. Available at: <https://calfire.app.box.com/s/wahuw9ny7cgn89xpxh7092ur50r1pwvj/file/1785859540511>. Accessed February 26, 2025.

¹³⁹ California Department of Forestry and Fire Protection (CAL FIRE). 2025. Local Responsibility Area Fire Hazard Severity Zones. Available at: <https://calfire.app.box.com/s/wahuw9ny7cgn89xpxh7092ur50r1pwvj/file/1785859540511>. Accessed February 26, 2025.

d. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

The project area is not located in a VHFHSZ or a WUI, although it is approximately 400 feet west of a VHFHSZ and 450 feet west of a WUI.¹⁴⁰ The project site is not near any major watercourse, is located on relatively flat ground, and is not located in a 100-year or 500-year flood zone or landslide hazard zone. Therefore, the project would not expose people or structures to significant risks as a result of post-fire instability, including downslope or downstream flooding or landslides, and no impact would occur.

3.21 Mandatory Findings of Significance

Environmental Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
(a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☒	☐	☐
(b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	☐	☒	☐	☐
(c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☒	☐	☐

Environmental Evaluation

a. Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

The project site is located on and adjacent to an existing City park and adjacent to the Wavecrest Open Space. The project would include improvements and expansions to an existing park facility. The land uses surrounding the work area consist of undeveloped parcels and open space, and this condition would not change with project implementation. There are ESHAs on and adjacent to the project area and the

¹⁴⁰ California Department of Forestry and Fire Protection (CAL FIRE). 2025. Local Responsibility Area Fire Hazard Severity Zones. Available at: <https://calfire.app.box.com/s/wahuw9ny7cgn89xpxh7092ur50r1pwvj/file/1785859540511>. Accessed February 26, 2025.

potential for two special-status plant species (Choris's popcorn flower, perennial goldfields) and one special-status wildlife species (CRLF) to occur on or adjacent to the project site. The project would remove and replace 25 heritage trees. Mitigation Measure BIO-1 would be implemented to protect plants and wildlife in the area, and Mitigation Measures BIO-2 through BIO-5 would be implemented to protect special-status plants and wildlife, wetlands, ESHAs, nesting birds, and heritage trees. With implementation of these mitigation measures, the project would have a less-than-significant impact on biological resources, including the habitat of a fish or wildlife species.

The project would avoid the existing radar structures on-site and there are no other known historic resources on the project site. The City's Standard Conditions would protect previously undiscovered historic resources; therefore, the project would have no impact on historic resources. The project would have a less-than-significant impact on archaeological resources and human remains with implementation of Standard Conditions and Mitigation Measure CUL-1.

The project would implement BAAQMD requirements to protect air quality, including mitigating dust and minimizing GHG emissions. As described in this IS/MND, the project would not degrade the quality of the environment, reduce or threaten any fish or wildlife species (endangered or otherwise), or eliminate important examples of the major periods of California history or pre-history. Therefore, impacts from the project would be less than significant with mitigation incorporated.

b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects?)

With implementation of the mitigation measures identified in this IS/MND, the project would have less-than-significant construction impacts to aesthetics, air quality, biological resources, cultural resources, energy, geology and soils, GHG emissions, hazards and hazardous materials, hydrology and water quality, noise, traffic and circulation, tribal cultural resources, and utilities and service systems. The project would have less-than-significant operational impacts to aesthetics, biological resources, geology and soils, public services, recreation, and utilities and service systems. Cumulative impacts are assessed for operational impacts as follows:

- **Aesthetics.** As described in Section 3.1, *Aesthetics*, the visual character of the project site would remain essentially the same. The project is visible in the distance from Highway 1 and Wavecrest Open Space. The project would remove some trees but would replant at approximately a 2.7:1 ratio for the 33 trees proposed to be removed. Because the project would improve an existing park, project construction would not add to cumulatively considerable visual impacts.
- **Air Quality and Greenhouse Gas Emissions.** As described in Sections 3.3, *Air Quality*, and 3.8, *Greenhouse Gas Emissions*, according to the BAAQMD's CEQA Air Quality Guidelines, if a project's emissions levels exceed the identified significance thresholds for air quality and GHGs, the emissions would be cumulatively considerable. Construction emissions for the project would not exceed BAAQMD thresholds of significance. Operationally, since the project would construct improvements to an existing park, the estimated emissions from operation of the proposed project would be similar to those under existing conditions. Therefore, construction and operational air quality and GHG emissions impacts would not be cumulatively considerable.
- **Biological Resources.** As described in Section 3.4, *Biological Resources*, the project could have potentially significant impacts to special-status species, ESHAs, nesting birds, and heritage trees. However, a biological monitor would be on-site during construction, and Mitigation Measures BIO-1 through BIO-5 would fully mitigate all potentially significant biological impacts from

construction to a less-than-significant level. Therefore, construction and operational impacts to biological resources would not contribute to cumulatively considerable impacts.

- **Cultural and Tribal Cultural Resources.** As described in Section 3.5, *Cultural Resources*, and 3.18, *Tribal Cultural Resources*, the project area underwent an archaeological investigation and there is no indication of any significant cultural or tribal cultural resources located in the project area. The proposed project would require the cessation of construction activities following the discovery of any previously unidentified cultural resources. The potential impacts remaining after cessation of proposed project activities would be negligible and would not contribute to an incremental impact. Therefore, the project would not cause impacts that could be cumulatively considerable.
- **Energy.** As described in Section 3.6, *Energy*, cumulative impacts to energy resources would occur if the proposed project would add to a substantial aggregation of impacts related to wasteful, inefficient, or unnecessary energy consumption or conflict with a State or local plan for renewable energy or efficiency. Projects in San Mateo County are required to comply with the BAAQMD and CALGreen requirements to reduce construction-related GHG emissions, which also reduces energy use. In addition, all projects in San Mateo County are required to comply with the County's Waste Management Plan by recycling at least 65% of all construction waste or demolition material. The project would replace existing lighting with new, more efficient lighting. Therefore, the project would not contribute to a cumulatively considerable impact on energy use.
- **Geology and Soils.** As described in Section 3.7, *Geology and Soils*, the project site is located in a seismically active area and is susceptible to potential liquefaction, lateral spreading, and shrink-swell potential. However, the project would upgrade existing park facilities and would comply with the CBC, which would ensure the project does not directly or indirectly cause substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking, and impacts would be less than significant. There is no indication of any paleontological resources located in the project area. Under Mitigation Measure GEO-1, the proposed project would require the cessation of construction activities following the discovery of any previously unidentified paleontological resources. The potential impacts remaining after cessation of proposed project activities would be negligible and would not contribute to an incremental impact. Therefore, the project would not cause impacts related to geology and soils that could be cumulatively considerable.
- **Hydrology and Water Quality.** As described in Section 3.10, *Hydrology and Water Quality*, project construction could cause runoff to adjacent land and drainages that could violate water quality standards and result in erosion or siltation. However, implementation of a SWPPP and compliance with the SMCWPPP BMPs, which is a standard COA, would prevent contaminated stormwater runoff from construction from entering adjacent stormwater drainages. The project also includes permanent green infrastructure, including basin and planter-style stormwater basins that would filter contaminants from operational stormwater runoff before flowing off-site, to meet the requirements of the City's GIP. Therefore, the project would not contribute to cumulative off-site water quality impacts.
- **Noise.** As described in Section 3.13, *Noise*, temporary noise impacts from project construction would be limited to the area of Wavecrest Road and Wavecrest Open Space, and construction hours would meet City requirements. Construction impacts would be short term and temporary, lasting approximately 6 months in Phase 1. Because of the temporary nature and short duration of project construction, project construction would not contribute to cumulatively considerable noise impacts.

- **Public Services.** As described in Section 3.15, *Public Services*, the project would not introduce new residents to the city. All public services have adequate resources to serve the park; therefore, the project would not contribute to cumulatively considerable impacts to public services.
- **Recreation.** As described in Section 3.16, *Recreation*, the project would upgrade and improve existing recreational facilities at Smith Field Park and would not introduce new residents to the city. State and local recreational resources are adequate to serve Smith Field Park; therefore, the project would not contribute to cumulatively considerable impacts to recreation.
- **Utilities and Service Systems.** As described in Section 3.19, *Utilities and Service Systems*, project operation may produce more solid waste with the addition of picnic areas; however, the project would install separate trash, recycling, and composting containers to improve recycling and composting. Solid waste goes to the Ox Mountain Landfill for recycling, composting, and disposal, which is permitted to receive up to 3,598 tons of waste per day.¹⁴¹ The added amount of operational waste from the project would be minimal. Therefore, solid waste from project operation would not contribute to a cumulatively considerable impact. The project is part of the planned growth of the city, and the City and CCWD have adequate water and sewer capacity available to serve the project. The project would implement required GIP stormwater measures and would not increase the rate of runoff into surrounding areas. The project would install improved, more efficient lighting, which would reduce existing electricity use. Therefore, the project would not contribute to cumulatively considerable impacts to utilities and service systems.
- **Wildfire.** As described in Section 3.20, *Wildfire*, the project area is approximately 450 feet west of a WUI. The project would improve firefighting infrastructure at an existing park, including paving roads and parking areas, adding an emergency turn around, and installing a new water line and fire hydrant. Therefore, the project would not contribute to a cumulatively considerable wildfire impact.

Given the small size of the project, its limited duration, and mitigation measures that have been identified to reduce all potential impacts, the incremental construction activities of the proposed project would not contribute to a cumulatively considerable impact.

The project would have limited operational/permanent impacts related to upgrading and improving facilities at Smith Field Park. These would include stormwater runoff from an additional 83,977 square feet (1.9 acres) of impervious pavement, which will be appropriately treated. The project site is not in a flood hazard zone and there are no recorded flooding events in the project area. The project would include implementation of stormwater drainage that meets the requirements of the City's GIP and has adequate capacity to carry runoff from projected development of the project area, and the additional runoff would not contribute to a cumulatively considerable impact. Therefore, the project would not contribute to a cumulatively considerable impact.

c. Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?

A significant impact may occur if a project has the potential to result in significant impacts, as discussed in the previous sections. The project would improve facilities at an existing park, which is of benefit to the City and community. As described throughout this IS/MND, with implementation of mitigation measures (where applicable), the project would not result in any significant impacts. Therefore, the project would not have the potential to result in substantial adverse effects on human beings, and this impact would be less than significant with mitigation incorporated.

¹⁴¹ California Department of Resources Recycling and Recovery (CalRecycle). 2024. SWIS Facility Detail. Corinda Los Trancos (Ox Mtn) (41-AA-0002). Available at: <https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/1561?siteID=3223>. Accessed June 11, 2024.

CHAPTER 4. PREPARERS OF THE INITIAL STUDY AND MITIGATED NEGATIVE DECLARATION

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