



Half Moon Bay 2023-2031 Housing Element Update

Initial Study – Mitigated Negative Declaration

prepared by

City of Half Moon Bay

Community Development Department

501 Main Street

Half Moon Bay, California 94019

Contact: Leslie Lacko, Community Development Director, 650-726-8910

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September 2025

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Initial Study – Mitigated Negative Declaration

1. Project Title

Half Moon Bay 2023-2031 Housing Element Update

2. Lead Agency Name and Address

City of Half Moon Bay
Community Development Department
501 Main Street
Half Moon Bay, California 94019

3. Contact Person and Phone Number

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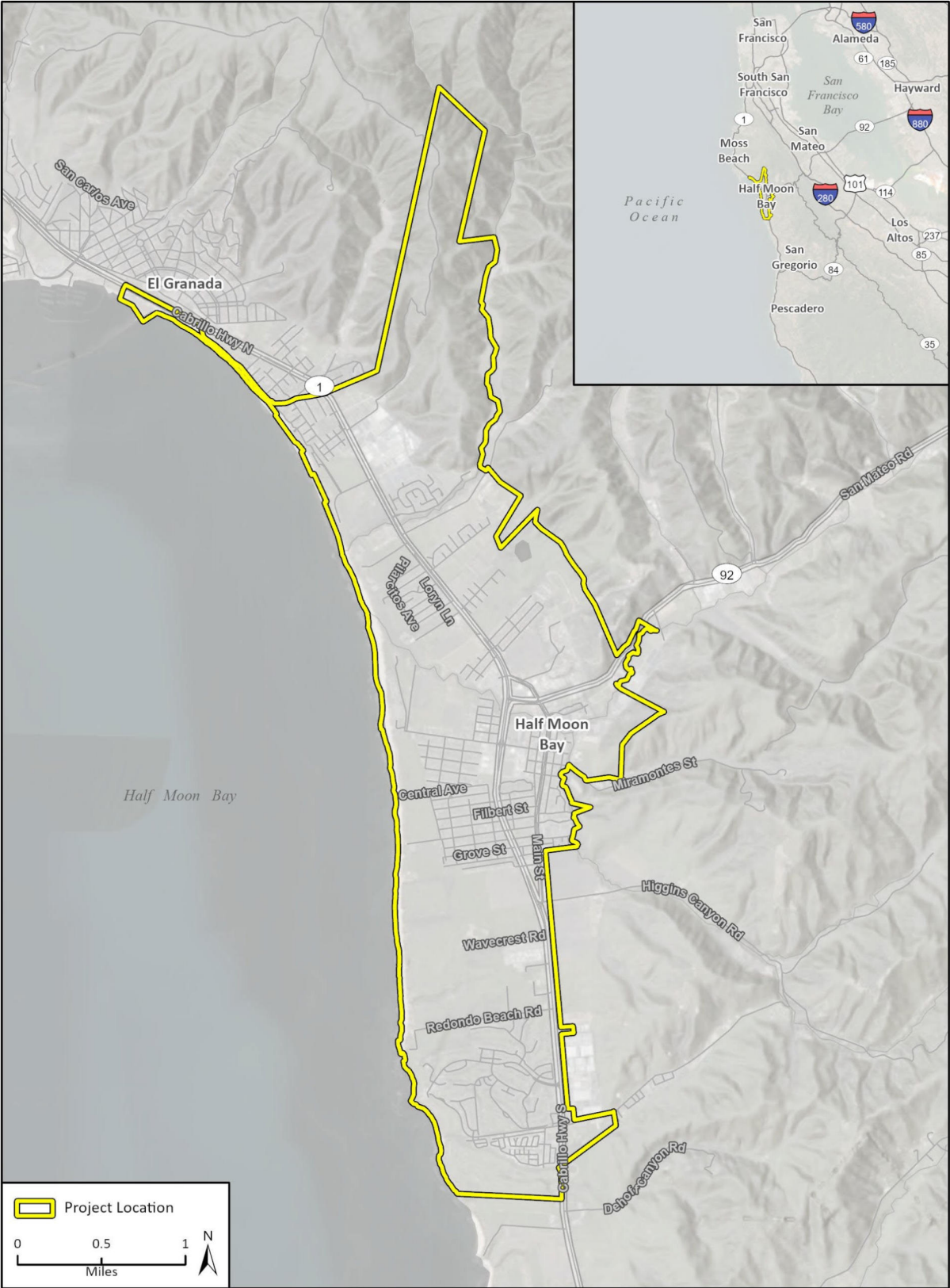
4. Project Location

The 2023-2031 Housing Element Update is a citywide program. Half Moon Bay is situated along the San Mateo County coastline approximately 23 miles south of downtown San Francisco and at the western edge of the Bay Area region (Figure 1). Half Moon Bay is connected to Pacifica and San Francisco to the north and to Santa Cruz to the south by Highway 1, and is connected to San Mateo, the Peninsula, and the East Bay to the east by Highway 92. Highway 84 is south of Half Moon Bay but also is a primary east-west route connecting the Half Moon Bay area to the southern Peninsula and Dumbarton Bridge into the East Bay.

5. Project Sponsor's Name and Address

City of Half Moon Bay
Community Development Department
501 Main Street
Half Moon Bay, California 94019

Figure 1 Regional Project Location



Basemap provided by Esri, Microsoft Bing and their licensors © 2022.
Half Moon Bay & Montara Mountain Quadrangles. T05S R06W S13; T05S R05W S7-8, S17-20, S28-33; T06S R05W S5, S8-9.

22-12480 Housing Element CCA
Fig X Project Location

6. Description of Project

Introduction

The project consists of a comprehensive update to the 2015-2023 Housing Element, which comprises one of several elements of the City's General Plan. The City is located wholly within the California Coastal Zone and is responsible for implementing its certified Local Coastal Program (LCP) (City of Half Moon Bay 2020a). The policy portion of the LCP – the Local Coastal Land Use Plan (LUP) – serves as the City's General Plan Land Use Element (City of Half Moon Bay 2020). The City's General Plan Elements, including the Housing Element, are prepared to be consistent with the LCP and vice versa. The 2015-2023 Housing Element was adopted in March 2015 and was designed to bring the Housing Element into compliance with State law in place at that time as part of the fifth cycle of Regional Housing Needs Assessment (RHNA) allocations. The current 2015-2023 Housing Element, as well as the other elements comprising the City's General Plan, are available for download on the City of Half Moon Bay, Community Development website.¹

State law requires that housing elements must be updated every eight years (California Government Code sections 65580 to 65589.8). The proposed project, which is the 2023-2031 Housing Element Update, identifies sites adequate to accommodate a variety of housing types for all income levels and needs of special population groups defined under state law (California Government Code Section 65583); analyzes governmental constraints to housing maintenance, improvement, and development; addresses conservation and improvement of the condition of existing affordable housing stock; and contains policies that promote housing opportunities for all persons. The proposed project updates the City of Half Moon Bay 2015-2023 Housing Element as part of the sixth cycle planning period, which covers the period January 31, 2023 through January 31, 2031.

The proposed 2023-2031 Housing Element would comply with State legislation, including legislation passed since adoption of the current 2015-2023 Housing Element in March 2015. The 2023-2031 Housing Element update will reflect current conditions and include the following sections:

- **Housing Needs Assessment:** This section includes an analysis of population and employment trends, the City's fair share of regional housing needs as identified in the sixth cycle RHNA allocation, household characteristics, and the condition of the housing stock.
- **Constraints on Housing Development:** This section reviews governmental constraints including land use controls, fees, and processing requirements, as well as non-governmental constraints, such as construction costs, availability of land and financing, physical environmental conditions (e.g., wetlands, floodplain, etc.), and units at risk of conversion that may impede the development, preservation, and maintenance of housing.
- **Housing Resources:** This section identifies resources available for the production and maintenance of housing, including an inventory of land suitable for residential development and discussion of federal, state, and local financial resources and programs available to support the City's housing goals.
- **Evaluation of Previous Housing Element:** This section evaluates the City's accomplishments under the previous Housing Element in order to determine the City's progress in implementing the housing element and to assess the effectiveness and appropriateness of the goals, objectives, and policies of that housing element.

¹ <https://www.half-moon-bay.ca.us/155/General-Plan>

- **Affirmatively Furthering Fair Housing Assessment:** This section includes an analysis specific to Half Moon Bay of primary findings and fair housing challenges in an effort to foster a more inclusive community free from barriers that restrict access to opportunity based on protected characteristics. Disparate housing needs for protected classes that are examined include cost burdened and severely cost burdened households, overcrowded households, substandard housing conditions, homelessness, displacement, and other considerations.
- **Public Engagement:** This section describes the community outreach activities that informed the programs in the proposed 2023-2031 Housing Element, including the Housing Forum, meetings with City Council and the City's Planning Commission, 21 Elements² outreach, stakeholder meetings with nonprofit service and housing providers, focus group sessions to learn more about the needs of disadvantaged communities, discussions with property owners and developers, and on-going correspondence with community members.
- **Housing Plan: Goals, Policies, and Programs:** This section establishes goals, policies, and programs to address the housing needs of the City. This section was developed based on the assessments and public input discussed in the preceding sections. Upon adoption and certification, this section would commit the City to five stated goals, which are supported with specific policies, implementing programs, and quantifiable objectives.

The draft Housing Element Update would establish objectives, policies, and programs to assist the City in achieving state-mandated housing goals. The City's implementation of these policies and programs includes amendments to the City's Zoning Ordinance. Pursuant to Government Code section 65583(c)(1), these actions will be accomplished within three years of the City's adoption of the Housing Element Update. As required by Government Code Section 65583(c)(8), the draft Housing Element Update provides a timeline for processing any amendment to the General Plan, Zoning Ordinance, and any other land use document that implements the draft Housing Element Update.

Lead agencies, such as the City of Half Moon Bay, are also required to consider the guidelines adopted by the Department of Housing and Community Development (HCD) in the preparation of the Housing Element (Government Code Section 65585). Each jurisdiction must prepare a Housing Element Annual Progress Report (APR) on the jurisdiction's status and progress in implementing its housing element. This report includes data on jurisdictions' progress toward meeting their housing goals, including data on all housing development applications, entitlements, building permits, and completions. (Government Code Section 65588).

New state housing laws have been enacted since the last housing element update cycle. The 2023-2031 Housing Element Update incorporates and addresses all pertinent housing law changes through analysis or new policies or programs. The 2023-2031 Housing Element is consistent with these changes in State law. Because the City is located within the Coastal Zone, several exceptions in these regulations that are applicable within the Coastal Zone would apply. Recent and relevant updates to State law are discussed in more detail in the introduction of the 2023-2031 Housing Element and are summarized below:

² 21 Elements is a multi-year, multi-phase collaboration of the twenty-one jurisdictions in San Mateo County, along with partner agencies and stakeholder organizations. More can be found about 21 Elements at <http://www.21elements.com/>

- **Affordable Housing Streamlined Approval Process:** Senate Bill (SB) 35 (2017), Assembly Bill (AB) 168, and AB 831 – These bills support a streamlined, ministerial review process for qualifying multifamily, urban infill projects in jurisdictions that have failed to approve housing projects sufficient to meet their state-mandated RHNA. At this time, the City is not subject to SB 35 because SB 35 exempts property within the Coastal Zone, and the entire City of Half Moon Bay is in the Coastal Zone; however, SB 423 passed in 2023 expanded SB 35 to include the Coastal Zone beginning January 1, 2025.
- **Additional Housing Element Sites Analysis Requirements:** AB 879 (2017) and AB 1397 (2017) – These bills require additional analysis and justification of the sites included in the sites inventory of the City’s Housing Element.
- **Affirmatively Furthering Fair Housing:** AB 686 (2017) – AB 686 requires the City to administer its housing programs and activities in a manner to affirmatively further fair housing and not take any action that is inconsistent with this obligation.
- **No-Net-Loss Zoning:** SB 166 (2017) – SB 166 amended the No-Net-Loss rule to require that the land inventory and site identification programs in the Housing Element include sufficient sites to accommodate any unmet RHNA allocation, should it exist.
- **Safety Element to Address Adaptation and Resilience:** SB 1035 (2018) – SB 1035 requires the General Plan Safety Element to be reviewed and revised to include any new information on fire hazards, flood hazards, and climate adaptation and resiliency strategies with each revision of the Housing Element. The City is undertaking the Safety Element update in a separate effort which started in 2023. The City’s Local Coastal LUP update, certified in 2021, includes a comprehensive hazards chapter that addresses fire, flood (including tsunami and sea level rise), geotechnical, and other environmental risks in context with climate change.
- **By Right Transitional and Permanent Supportive Housing:** AB 2162 (2018) and AB 101 (2019) – AB 2162 requires a jurisdiction to change its zoning to provide a “by right” process and expedited review for supportive housing. Additionally, AB 101 requires that a Low Barrier Navigation Center development be an allowed use by right in mixed-use zones and nonresidential zones permitting multifamily uses if it meets specified requirements.
- **Accessory Dwelling Units:** AB 2299 (2016), SB 1069 (2016), AB 494 (2017), SB 229 (2017), AB 68 (2019), AB 881 (2019), AB 587 (2019), SB 13 (2019), AB 670 (2019), AB 671 (2019), and AB 3182 (2020) – The 2016 and 2017 updates to State law included changes pertaining to the allowed size of accessory dwelling units (ADUs), permitting ADUs by right in at least some areas of a jurisdiction, and limits on parking requirements related to ADUs. More recent bills reduce the time to review and approve ADU applications to 60 days, remove lot size and replacement parking space requirements, and require local jurisdictions to permit junior ADUs. In accordance with State ADU laws and Coastal Zone requirements, the City’s ADU ordinance harmonizes the obligations of both fields.
- **Density Bonus:** AB 1763 (2019) and AB 2345 (2020) – AB 1763 amended California’s density bonus law to authorize significant development incentives to encourage 100 percent affordable housing projects, including allowing developments with 100 percent affordable housing units to receive an 80 percent density bonus in addition to the otherwise maximum allowable density on the site. AB 2345 created additional density bonus incentives for affordable housing units provided in a housing development project. It also requires that the APR include information regarding density bonuses that were granted.

- **Housing Crisis Act of 2019:** SB 330 – SB 330 enacts changes to local development policies, permitting, and processes that will be in effect through January 1, 2025. Recent updates to this act include SB 8 (2019), which extended the effective period of SB 330 until January 1, 2030.
- **Surplus Land Act Amendments:** AB 1486 and AB 1255 (2019) - AB 1486 refines the Surplus Land Act to provide clarity and further enforcement to increase the supply of affordable housing. AB 1255 requires a jurisdiction to create a central inventory of surplus and excess public land each year. The City is required to transmit the inventory to HCD and to provide the list to the public upon request.
- **Housing Impact Fee Data:** AB 1483 (2019) – AB 1483 requires the City to publicly share information about zoning ordinances, development standards, fees, exactions, and affordability requirements.
- **Emergency and Transitional Housing Act of 2019:** AB 139 (2019) – AB 139 established new criteria for evaluating the needs of the homeless population.
- **Standardization of Sites Inventory Analysis and Reporting:** SB 6 (2019) – SB 6 requires the City to electronically submit the sites inventory to HCD starting in 2021.
- **Evacuation Routes:** SB 99 and AB 747 (2019) – AB 747 and SB 99 require the General Plan Safety Element to be updated to identify evacuation routes and their capacity, safety, and viability under a range of emergency scenarios and to include information identifying residential developments in hazard areas that do not have at least two emergency evacuation routes. The City is currently working with local agencies to update evacuations plans under multiple incident scenarios such as fire, tsunami, and earthquake.

Regional Housing Needs Assessment

State Housing Element law requires local jurisdictions to update their Housing Elements at least once every eight years in response to the eight-year RHNA process. The RHNA process defines each local jurisdiction's share of the region's projected housing needs, by income category, for the planning period. State law mandates that jurisdictions provide sufficient land to accommodate a variety of housing opportunities for all economic segments of the community. Compliance with this requirement is measured by the jurisdiction's ability to identify adequate sites to accommodate the RHNA.

The Association of Bay Area Governments (ABAG), as the regional planning agency, is responsible for allocating the RHNA to individual jurisdictions within the region. In December 2021, ABAG approved the final RHNA methodology and final RHNA allocations for jurisdictions within the nine-county Bay Area, including San Mateo County and the City of Half Moon Bay. The allocation established for the City of Half Moon Bay is 480 dwelling units (ABAG 2022). The City of Half Moon Bay's RHNA unit count is broken down by income category as follows:

- 181 very low-income dwelling units
- 104 low-income dwelling units
- 54 moderate income dwelling units
- 141 above moderate income (i.e., market-rate) dwelling units

ABAG defines very low income as less than 50 percent of the area median income. Low income is defined as between 50 percent and 80 percent of the area median income, and moderate income is defined as between 80 percent and 120 percent. Above moderate income is defined as exceeding 120 percent of the area median income (ABAG 2022).

Half Moon Bay Housing Allocation

The HCD recommends that jurisdictions plan for a “buffer” or housing supply exceeding the RHNA allocation by 15 percent to 30 percent (HCD 2020). As discussed in the prior section, the RHNA allocation established for the City of Half Moon Bay is 480 dwelling units (ABAG 2022). The City’s 2023-2031 Housing Element, which integrates/updates supporting socioeconomic, demographic, and household data, is specifically intended to accommodate the City’s RHNA allocation plus a substantial buffer of at least 20 percent for each income category in the allocation. The first draft of the 2023-2031 Housing Element prepared by the City envisioned up to 772 dwelling units. Following review and input on the 2023-2031 Housing Element, the total dwelling units envisioned was increased to 782. In no circumstances would the dwelling unit count allocation envisioned in the 2023-2031 Housing Element exceed 782 units.³ This allocation would be met with the following resources:

- **Approved, Pending Approval, and Under Construction Residential Projects:** These projects, which are referred to as “pipeline projects” would provide a total of 342 dwelling units. The 342 dwellings units are divided into the following categories:
 - 62 very low-income dwelling units
 - 25 low-income dwelling units
 - 70 moderate income dwelling units
 - 185 above moderate income (i.e., market-rate) dwelling units
- **ADUs** are built on properties with existing single family or multi-family residences and are limited in terms of square footage and location. Based on trends in Half Moon Bay since streamlined permitting processes and other requirements pertaining to ADUs that came about because of State legislation enacted in 2017, the City conservatively estimates that ADUs would add 112 dwelling units to the housing inventory by 2031.
- **Opportunity Areas/Sites Inventory:** Government Code Section 65583(a)(3) requires Housing Elements to contain an “inventory of land suitable for residential development, including vacant sites and sites having potential for redevelopment, and an analysis of the relationship of zoning and public facilities and services to these sites.” Opportunity Sites include vacant or underutilized properties that offer opportunities for infill and intensification, and those with economically or physically obsolete development.

Government Code Section 65583.2(c) requires a local government, as part of the analysis of available sites, to calculate the projected residential development capacity of the sites identified in the housing element that can be realistically achieved. This “Realistic Capacity” calculation is, in Half Moon Bay’s case, lower than the total capacity of the sites if they were built to maximum density. In order to provide the most conservative CEQA disclosure, the environmental analysis focuses on the maximum allowable density that could be built rather than the Realistic Capacity described in the Housing Element.

The City has identified 12 Opportunity Sites that would accommodate a maximum of 328 dwelling units. The breakdown of dwelling units on Opportunity Sites are provided below:

³ This Initial Study evaluates development of up to 782 dwelling units, which is a conservative analysis of environmental impacts. The analysis of environmental impacts is considered conservative because the severity of impacts is directly correlated with the amount of development envisioned in the Housing Element. If 782 or fewer dwelling units are ultimately included in the Housing Element, this Initial Study will therefore sufficiently and adequately serve to analyze and disclose the potential environmental impacts of implementing the 2023-2031 Housing Element.

- 254 very low- and low-income dwelling units
- 30 moderate income dwelling units
- 44 above moderate income (i.e., market-rate) dwelling units

Opportunity sites include sites involved in the expansion of mobile home parks (MHP), affordable housing development of Workforce Housing Overlay (WHO) sites, and multi-family and mixed-use development in the Town Center (TC). Affordable housing developments in the region, as shown by the table below, typically develop at densities well above 100 percent of maximum density allowed due to State Density Bonus Law and other bonus density programs. The existing zoning, maximum density and buildout, and realistic capacity of each opportunity site are shown in Table 1.

Table 1 Housing Opportunity Sites

Site #	Address	LCLUP/ General Plan	Existing Zoning	Realistic Capacity	Maximum Density (DU/AC)	Affordability Allocation	Maximum Buildout (DU)
1	880 Stone Pine Road (APN 056-260-180)	PF	U-R	50	30	Very Low	135
2	498 Kelly Avenue (APN 056-181-010)	PF	P-S	60	30	Low	72
3	300 Block Church Street (APN 056-150-020)	PF	P-S	52	45	Very Low	70
4	0 Block Stone Pine Road (APN 056-250-070)	C-G	C-G	9	29.04	Moderate	14
5	101 Canada Cove Avenue (APN 066-081-190)	MHP	MHP	40	21.78	Low	90
6	740 Purissima Street (APN 056-182-090)	R-H	R-2	12	29	Moderate	16
7	895 Main Street (APN 056-210-130)	C-G	C-D	4	30	Moderate	6
8	500 Block Poplar Street (APNs 064-244-030, -040)	R-H	R-2	5	29.04	Moderate	9
9	604 Poplar Street (APNs 064-272-010, -020, and - 030)	R-H	R-2	5	29.04	Moderate	10
10	600 Block Poplar Street (APNs 064-272-170, -180, - 190, -200)	R-H	R-2	6	29.04	Moderate	11
11	940 Main Street (APN 064-272-100)	R-H	R-2	41	29.04	Very Low	55
12	Pacific Ridge Phases 2 & 3 (APNs 056-580-010 to -180, 056-570-010 to -260)	PD	PUD	44	1	Above Moderate	44
Total				328			532

Source: City of Half Moon Bay Draft Housing Element 2024

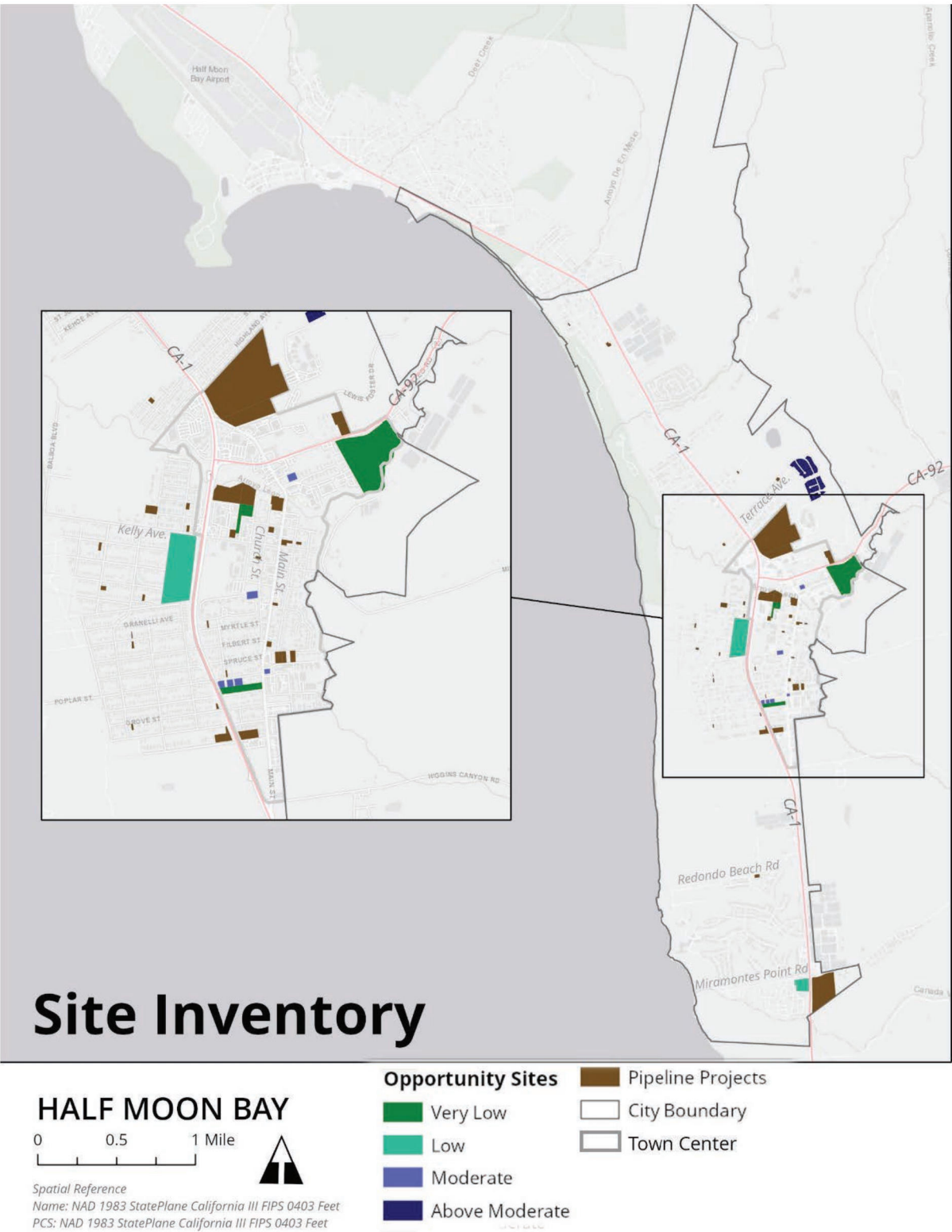
The voters of Half Moon Bay adopted Measure D in 1999, a growth control measure that restricted the number of new dwelling units the City can permit in any given year. Measure D divides these dwelling units between the “Downtown Area” (Downtown) and the rest of the city. The maximum number of allocations for new housing units is calculated using a specified formula to result in a maximum annual population increase of 1 percent over the current population. Half of the allocations (0.5 percent) are assigned to Downtown, and the other half to outside Downtown. Annually, the Half Moon Bay City Council also has discretion to approve additional “bonus” allocations that would result in an additional 0.5 percent population growth within the Downtown area. The City Council has approved such bonus allocations for Downtown for each year that Measure D has been in place, which has allowed a total of 1.5 percent growth per year. The 2023-2031 Housing Element is consistent with the City’s Residential Growth Limitation Ordinance established by Ballot Measure D and certified by the Coastal Commission in the City’s LCP. The growth limitation established by Measure D would not directly impact the City’s ability to support its RHNA during the Cycle 6 planning period.

The 2023-2031 Housing Element includes Program 6-8 to clarify Measure D’s compliance with State law regarding ADUs through the following actions:

- Seek approval of a LCP Amendment to revise the allocation requirements for ADUs and JADUs, from a full allocation per unit to a lesser amount, such as a partial allocation of 0.5 or amount considered reasonable by the City. The City will prepare amendments to its LCP for City Council consideration and Coastal Commission certification to increase available allocations.
- Reallocate unused Measure D allocations for ADUs and affordable housing units by rolling over those allocations to the next year for which no building permit is applied.
- Prepare a ballot measure for the 2028 election with a substantial public communications process that will revise Measure D by:
 - Revising to define “Downtown Area” as the area designated as the Town Center in the Certified Local Coastal Land Use Plan.
 - Exempting Accessory Dwelling Units (ADUs), including Junior Accessory Dwelling Units (JADUs) from Residential Dwelling Unit Allocation limitations
- If the 2028 ballot measure fails, the City will seek other measures as necessary

Future LCP amendments would be subject to CEQA; however, no amendments are included in the proposed project and therefore these are not analyzed further in this document. The location of the 12 Opportunity Sites identified by the City and included in 2023-2031 Housing Element Update is shown in Figure 2. Figure 2 also shows the pipeline project locations. The Opportunity Sites would be located away from Coastal Resources and other sensitive environmental resources or hazards, such as very high fire hazard severity zones, biological resources, and geological resources.

Figure 2 Opportunity Sites and Pipeline Projects



Existing Setting

Half Moon Bay/Project Area

The proposed project would be carried out city-wide. The project area is therefore the entire city of Half Moon Bay. The 2022 California Department of Finance Population and Housing Estimates indicate that the population of Half Moon Bay was 11,303 as of January 1, 2025 (California Department of Finance 2025). As shown in Figure 1, Half Moon Bay is situated along the San Mateo County coastline approximately 23 miles south of downtown San Francisco and at the western edge of the Bay Area region. Other nearby major cities include Daly City, Redwood City, San Mateo, Palo Alto, Mountain View, and San Jose.

As one of the earliest settlements in San Mateo County, Half Moon Bay has a traditional downtown and agricultural heritage. The western end of the city is characterized by the coastline, which is vast and sweeping. The downtown area of the city is slightly less than a mile inland from the coastline. Downtown is largely commercial, but residential development surrounds it, especially at the southern end of downtown. Other areas of Half Moon Bay, notably along Highway 1, are also developed with residential uses. The eastern side of the city is bordered by the Santa Cruz Mountains/Coast Range. Due to this, the far eastern portions of Half Moon Bay are sloping and often contain forest cover or other natural vegetation communities. Urban development is less prevalent in the eastern reaches of the city. Several drainages originate in the Santa Cruz Mountains and drain through the city into the Pacific Ocean, such as Pilarcitos Creek and Frenchmans Creek.

Half Moon Bay has a Mediterranean climate and its proximity to the ocean helps to produce moderate temperatures year-round, with rainfall concentrated in the winter months. Ocean breezes cool the region in the summer and moderate winter temperatures from reaching freezing or below freezing. Average daytime summer temperatures in the area are usually in the high 60s (Fahrenheit). Nighttime low temperatures during the summer are typically in the high 40s to low 50s, while the winter high temperature tends to be in the high 50s. Characteristic of Half Moon Bay's mild Mediterranean climate, the winter low temperatures are in the 40s. Annual average rainfall in Half Moon Bay is about 26 inches (Western Regional Climate Center 2016). The region is subject to various natural hazards, including earthquakes, landslides, flooding, and wildfires.

Surrounding Land Uses

The neighborhood immediately north of Half Moon Bay is a census-designated place called El Granada. Within El Granada, development is concentrated primarily along Highway 1, consisting primarily of residential development. Other small census-designated places, such as Moss Beach and Montara are located north of El Granada, eventually giving way to much more dense urban development in Pacifica and Daly City. Like Half Moon Bay, these smaller census-designated places to the north area framed by the Pacific Ocean to the west and the Santa Cruz Mountains/Coast Range to the east.

Land immediately east of Half Moon Bay is largely undeveloped and located on west-facing slopes of the Santa Cruz Mountains. The area is characterized by open space, such as forests or open meadows or grasslands. Slopes can be steep in this area. While the land immediately east of the city is largely undeveloped, the area contains occasional residential development and agricultural uses. Just past the rural land immediately to the east is the City of San Mateo. Land to the south of Half Moon Bay is similar to the east in that there is very little development other than coastal access and recreation, agricultural uses, and occasional houses generally along and/or west of Highway 1.

There are no surrounding land uses west of Half Moon Bay because the Pacific Ocean forms the western boundary of the city.

7. Other Public Agencies Whose Approval is Required

Adoption of the 2023-2031 Housing Element would require the following discretionary actions by the City of Half Moon Bay Planning Commission and/or City Council:

- Adoption of the final environmental analysis
- Approval of the 2023-2031 Housing Element
- Approval of associated zoning changes in a subsequent action

HCD does not approve the City's Housing Element. The City Council performs that task. However, the City is required to submit it to HCD for certification.

Because the Housing Element is not part of the City's LCP, it is not subject to Coastal Commission certification, although the proposed future zoning changes would be processed as LCP amendments requiring Coastal Commission certification.

8. Native American Tribal Consultation

The City initiated the tribal consultation process, as required under Public Resources Code (PRC) Section 21080.3.1 and consistent with Assembly Bill (AB) 52 and Senate Bill (SB) 18. The City mailed consultation letters regarding the 2023-2031 Housing Element Update between May 23, 2022 and July 5, 2022 according to SB 18 and AB 52, to contacts identified by the Native American Heritage Commission that requested the City of Half Moon Bay notify them of projects subject to AB 52 or SB 18. As of the drafting of this Initial Study, the City has not received any responses requesting consultation. Under AB 52, Native American tribes have 30 days to respond to consultation notification and request further project information and formal consultation; under SB 18 Native American tribes have 90 days to respond requesting consultation. Refer to Section 18, *Tribal Cultural Resources*, for additional information about Native American Tribal consultation.

Environmental Factors Potentially Affected

This project would potentially affect the environmental factors checked below, involving at least one impact that is “Potentially Significant” or “Less than Significant with Mitigation Incorporated” as indicated by the checklist on the following pages.

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

Determination

Based on this initial evaluation:

- ☐ I find that the 2023-2031 Housing Element COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- ☒ I find that although the 2023-2031 Housing Element could have a significant effect on the environment, there will not be a significant effect in this case because revisions to the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- ☐ I find that the 2023-2031 Housing Element MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- ☐ I find that the 2023-2031 Housing Element MAY have a “potentially significant impact” or “less than significant with mitigation incorporated” impact on the environment, but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

- ☐ I find that although the 2023-2031 Housing Element could have a significant effect on the environment, because all potential 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 2023-2031 Housing Element , nothing further is required.

Signature

Date

Printed Name

Title

Environmental Checklist

1 Aesthetics

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would implementation of the 2023-2031 Housing Element:				
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 a 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?	☐	☐	☒	☐
d. Create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area?	☐	☐	☒	☐

Setting

A scenic vista can generally be defined as a public viewpoint that provides expansive views of a valued landscape for the benefit of the public. In Half Moon Bay, examples of scenic vistas include expansive ocean and coastal bluff views and views of the Coast Range east of the city. The City has not formally adopted or designated vistas. However, the City has designated scenic corridors that provide views of the vistas, such as views of the Pacific Ocean and views of the Coast Range. As discussed in the LCP, scenic corridors in Half Moon Bay include:

- Town Boulevard Corridor. The Town Boulevard Corridor includes Highway 1 and State Route 92 within City limits and offers views of the Santa Cruz Mountains to the east as well as ocean views to the west along some segments of the highways as noted below.
- Scenic Coastal Access Routes. Scenic coastal access routes are public roadways associated with coastal access points where breaks in vegetation and development allow for uninterrupted views west towards the ocean from Highway 1

- **Broad Ocean Views.** Where the ocean can be seen from within the City, it substantially adds to the visual interest and quality of the view. Several segments of Highway 1 provide broad ocean views; namely across Surfer's Beach, between the paper street Knewing Avenue and Frenchmans Creek, between Venice Boulevard and Wave Avenue, and between Seymour Street and Wavecrest Road. Other broad, public ocean views are available from Naples Avenue, Wave Avenue, Railroad Avenue, Highway 92, the James Johnston House, and the Pacific Ridge Trail.
- **California Coastal Trail.** The California Coastal Trail is an essential Half Moon Bay scenic resource that provides expansive views of the ocean, beaches, bluffs, foothills, coastal recreation activities, Pillar Point, the harbor and marina, and historic resources.

Impact Analysis

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

Several of the proposed housing sites are located along Highway 1 and State Route 92 in Half Moon Bay, which the City has defined as its scenic Town Boulevard Corridor. Several of the housing sites are also on streets that the City has identified as scenic coastal access routes, such as Kelly Avenue, which is the primary access route to Francis Beach in the City. New residential development would be on either side of roads rather than directly within the road or road right-of-way. This would prevent residential buildings from fully obstructing views of the ocean and other vistas when travelling on the roads, as the views are generally in the direction of travel and aligned with the road. However, in some instances, scenic vistas are possible from these roads in multiple directions, including to the side of road. New residential buildings could obstruct scenic views from either side of the aforementioned roads (i.e., scenic corridors), depending on the exact design and placement of structures. Existing buildings occur at some of the housing sites and already partially obstruct views. However, residential buildings constructed on these sites as envisioned in the Housing Element Update could be larger than existing buildings, resulting in more obstruction of views.

The City's LCP provides for the protection and enhancement of scenic and visual resources pursuant to the Coastal Act. Policies in the LCP include requirements to protect such areas through review of new development proposals. Policies require development to minimize visual impacts, including by protecting views to and along the ocean, minimizing the alteration of natural landforms, ensuring compatibility with the surrounding setting, and restoring visually degraded areas where feasible. Policies also establish citywide development standards for design review and measures to minimize visual impacts from grading and land divisions. Scenic corridor policies in the LCP require protection of important or substantial views available along Highways 1 and 92, scenic coastal access routes between Highway 1 and the beach, and the California Coastal Trail. Additional policies address the need to enhance community gateways on Highway 1 and 92, and ensure that improvements to highways, roads, and streetscapes minimize visual impacts. Applicable LCP policies include Policy 9-1 through Policy 9-24:

- | | |
|-------------------|--|
| Policy 9-1 | Scenic and Visual Resource Areas. 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. |
| Policy 9-2 | Scenic Resource Protection. 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. |

- Policy 9-3** **Visual Quality.** Preserve and enhance the unique visual quality that contributes to Half Moon Bay's coastal and small-town character, including its open, expansive views from the coastal terrace to the beaches, bluffs, ocean, and upland slopes.
- Policy 9-5** **Visual Impact Evaluation.** Where any development is proposed within a scenic and visual resource area, including as designated on Figure 9-1, a site-specific visual impact evaluation shall be required and may include visual simulations, story poles, and/or other means of visual assessment as appropriate based on the type and location of development.
- Policy 9-6** **Site Planning and Design for New Development.** Require new development to be subject to design review to ensure it is sited and designed to protect public views of scenic and visual resource areas and to be visually compatible with the character of the surrounding area. Measures to be considered may include, but are not limited to the following:
- a. Siting development in the least visible portion of the site;
 - b. Breaking up the mass of new structures;
 - c. Designing structures to blend into the surrounding natural landscape;
 - d. Restricting building maximum size and height;
 - e. Clustering or distributing development;
 - f. Incorporating landscape elements and screening; and
 - g. Conformance with any adopted design guidelines.
- Policy 9-7** **Alteration of Landforms.** Require that all new development be sited and designed to minimize alteration of natural landforms through the following measures:
- a. Conform to the natural topography of the site;
 - b. Minimize substantial grading or reconfiguration of the project site;
 - c. Prohibit flat building pads on slopes and requiring building pads on sloping sites to utilize split-level or stepped-pad designs;
 - d. Require that man-made contours mimic the natural contours of the site;
 - e. Ensure that graded slopes blend with the existing terrain of the site and surrounding area;
 - f. Minimize grading permitted outside of the building footprint;
 - g. Cluster structures to minimize site disturbance and development area;
 - h. Avoid landscaping that blocks public ocean views;
 - i. Minimize the height and length of cut and fill slopes;
 - j. Minimize the height and length of retaining walls; and
 - k. Allow the balancing of cut and fill operations on site only where the grading does not substantially alter the existing topography, where it blends with the surrounding area when viewed from public locations, and where it conforms to all applicable LCP policies for hazard avoidance and habitat protection. Export of cut material may be required to preserve natural topography.

- Policy 9-8 Land Divisions.** Require land divisions, including lot line adjustments, to be designed in a manner that minimizes impacts to visual resources. Measures for minimizing visual impacts include the following:
- Clustering the building sites to minimize site disturbance and maximize open space;
 - Prohibiting land divisions and adjustments that would create lots with insufficient space for development, including to avoid the need for fuel modification, without impacting visual resources;
 - Requiring new land divisions to provide sufficient park and open space areas;
 - Prohibiting creation of new building sites above the 160-foot contour line within City limits;
 - Minimizing the length and impermeability of access roads and driveways;
 - Using shared or abutting driveways to access development on adjacent lots, where appropriate;
 - Reducing the maximum allowable density in steeply sloping and visually sensitive areas; and
 - Revegetating graded building pad areas, if any, with native plants.

- Policy 9-9 Streetscapes.** Streetscape improvements, whether they are required as a condition of new development or implemented as a City project, shall be designed and maintained with street trees, vegetation, and landscaping to enhance the visual experience of the streetscape without obstructing scenic views upon maturity.

- Policy 9-10 Fences, Walls, and Landscaping.** 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.

- Policy 9-12 Town Boulevard Scenic Corridor.** 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.

Update the Implementation Plan (IP) with additional standards for new development along the Town Boulevard based on additional study of the scenic corridor. Assessment should, at a minimum, consider views of visual resource areas from the perspective of existing and potential development along the Town Boulevard and identify scenic segments along Highway 1 and 92, including views of the ridgelines and other visual resource areas. Development standards

should address, at a minimum, appropriate building heights and setbacks, longest wall lines, minimum space between buildings, and streetscape design.

- Policy 9-15 Scenic Coastal Access Routes.** 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.
- Policy 9-16 Broad Ocean Views.** Ensure that areas providing broad, public ocean views, including as designated on Figure 9-1, are preserved and enhanced in association with new development projects. In such areas, structures shall be sited and designed to avoid obstruction of broad, public ocean views, shall not exceed 15 feet in height unless an increase in height would not obstruct public views to the ocean or would facilitate clustering of development so as to result in greater view protection, and shall ensure that any proposed landscaping, when mature, will not obstruct public views to the ocean.
- Policy 9-17 California Coastal Trail Views.** 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.
- Policy 9-22 Open Space Conservation Areas.** 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.
- Policy 9-23 Upland Slopes and Ridgelines.** Protect broad views of upland slopes, prominent ridgelines and other intervening ridgelines as viewed from scenic corridors and the beach and shoreline through the following means:
- Prohibiting new development above the 160-foot contour line and on slopes greater than 30 percent, including grading and subdivisions but excluding public trails and critical facilities or public infrastructure that cannot be located elsewhere;
 - Ensuring new development below the 160-foot contour line is sited and designed to minimize intrusions into the ridgeline through the application of appropriate height and setback restrictions; and
 - Establishing standards for the Town Boulevard, other streetscapes, and large-scale landscaping projects to highlight and frame, but not block, views of visual resource areas.

Policy 9-24 New Development on Slopes. On sloped building sites below the 160-foot contour line, locate building pads and new development on flatter portions of the project site as consistent with the grading restrictions and hazard avoidance policies of this LCP, except where there is an alternative location that would be more protective of scenic resources or ESHA.

With implementation of the applicable LCP policies, impacts to scenic corridors would be reduced. For example, Policy 9-15 requires that new development on designated scenic coastal access routes from Highway 1 to the beach protect the scenic quality of the corridor and avoids obstruction or substantial 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. With implementation of applicable LCP policies, impacts of the 2023-2031 Housing Element Update would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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

An approximately 0.3-mile segment of Highway 1 outside of but immediately adjacent to the city limits at the south end of Half Moon Bay is a designated state scenic highway. The entire length of Highway 1 through Half Moon Bay is not designated as a state scenic highway but is eligible for designation. Likewise, State Route 92 within Half Moon Bay is not designated but is eligible for designation as a state scenic highway (Caltrans 2022). However, the LUP treats Highway 1 and State Route 92 as scenic corridors for the purposes of the LCP policies.

Several of the proposed housing sites are located along Highway 1 and State Route 92 in Half Moon Bay, but these roadway segments are not designated state scenic highways. Two of the proposed housing sites are in proximity to and are visible from the designated segment of Highway 1 at the south end of Half Moon Bay. These sites are characterized primarily by open grass or lawn areas, but trees are located near the boundaries of both sites. Development of housing on these sites may require the removal of trees. However, development of these sites with housing would also involve landscaping, including planting trees in accordance with LCP policies 6-69 and 6-70. Residential landscaping, specifically trees, would replace existing trees that are removed during construction of housing.

The LCP also contains policies pertaining to reducing visual impacts in scenic areas, including along Highway 1. Applicable policies include Policy 9-5, 9-6, 9-11, and 9-13. For example, Policy 9-11 requires new development in scenic areas to provide landscape screening to reduce visual impacts of the development. Policy 9-13 contains requirements specific to development along Highway 1 and 92. With implementation of applicable LCP policies, project impacts on scenic resources within a state scenic highway would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- c. *Would the project, 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 a 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 proposed housing sites occur in or adjacent to existing urbanized areas of Half Moon Bay. The City did not identify housing sites in the more rural or open spaces areas or along ocean bluffs. Half Moon Bay is not considered an urban area pursuant to CEQA Statute 21071.

The 2023-2031 Housing Element would facilitate infill on most of the housing sites. Infill development would accommodate a greater density of residential development on these sites compared to existing conditions. Increased density would change the visual character to some degree through the introduction of horizontal and vertical (multi-story) complexes in areas where mostly single-story development exists. The 2023-2031 Housing Element would also result in development of property that currently contains no development, such as vacant properties. The addition of residential buildings on these sites would change the visual character of the sites as seen from public viewpoints such as surrounding roadways. These sites are characterized primarily by field agricultural and equestrian uses or are undeveloped. Development of housing on these sites would largely convert these visually open areas to housing development, thereby changing the visual character of the sites.

The residential development facilitated by the 2023-2031 Housing Element Update would be subject to design review as part of the permitting process and would be required to comply with the LCP policies that guide scenic and visual quality and objective design standards. Applicable LCP policies include Policy 9-1 through 9-39. These policies would limit abrupt changes in height from one-story neighborhoods to taller buildings, mandate setbacks, and require landscaping to soften or shield views of the new residential development. The LCP policies would also require a visual impact evaluation for specific projects proposed within a scenic or visual resource area, such as the housing sites along Highway 1 and Highway 92. Similarly, objective design standards would apply to site layout, massing, building materials, parking, and landscape design, among other project design features.

City zoning and overlay regulations that implement LCP goals and policies intended to protect visual quality would also apply to the development implemented under the 2023-2031 Housing Element. These include undergoing development design review as part of the permitting process to ensure compliance with existing design standards. Furthermore, City design guidelines and landscaping guidelines would apply to such development. These regulations and processes would apply to projects developed in the housing site, minimizing visual quality impacts. Furthermore, because new development would likely include increased landscaping associated with residential projects, including trees, ornamental shrubs, and other features to enhance shared open space areas, visual quality could be improved.

With adherence to design requirements as indicated in the Half Moon Bay Municipal Code (HMBMC) and the policies outlined in the City's LCP, impacts to visual quality would be less than significant and development projects implemented under the 2023-2031 Housing Element would have less than significant impacts.

LESS THAN SIGNIFICANT IMPACT

- d. *Would the project create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area?*

The residential development envisioned in the proposed Housing Element would increase the amount or number of lights in Half Moon Bay. Housing units would include exterior lighting, such as porch lights and exterior security lighting. Entryways to housing units would also include lighting, especially entryways into new multi-family housing buildings which typically feature a more elaborate entry than single-family dwelling units. Some of the proposed housing sites would also include new internal circulation roads and sidewalks that would also require exterior lighting. Additionally, as described in Section 17, *Transportation*, the proposed project would generate vehicle trips. Vehicle trips at night would generate light from headlights.

The LCP includes the following policies that would reduce the light impacts of the proposed project:

- 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;
 - 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; and
 - c. Reducing light pollution from greenhouses as a condition of approval for new development through shielding and other practices that minimize light spillover.
- Policy 9-31 Lighting Plan Review.** Require submittal of lighting plans with applications for new development, including subdivisions, for review of lighting characteristics.
- Policy 9-32 Street Lighting.** Street lighting design and fixtures shall abide by the following criteria:
- a. Provide enough lighting to meet safety standards;
 - b. Utilize lower light poles as feasible;
 - c. Ensure that fixtures direct light down with no spillover beyond the roadway area they intend to illuminate; and

Glare would be generated by sunlight reflecting off metal or glass surfaces of cars parked in driveways or parking lots with insufficient sources of shade; or from building surfaces including walls or other exterior surfaces painted bright white and roofs with metallic or otherwise light-colored or reflective surfaces. Glare could also occur from new windows installed in proposed housing with west- or east-facing orientations. However, residential development typically does not involve large expansive panels of glass that is more typical of commercial development, such as storefronts. New development resulting from implementation of the proposed project would also be subject to the

HMBMC Section 18.36.055, pertaining to off-street parking facilities. Section 18.36.005 requires that parking area lighting be deflected to not shine or create glare within residential areas.

With implementation of the LCP policies and mandatory adherence to the HMBMC, the project would not create a new source of substantial light or glare that adversely affects views in the area. Project impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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2 Agriculture and Forestry Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would implementation of the 2023-2031 Housing Element:				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on 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?	☐	☐	☐	☒

Setting

Most of the identified Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) in Half Moon Bay is within the urban boundary of the city as opposed to its rural areas. The City's LCP states that there are no Williamson Act contracts within city limits of Half Moon Bay. There are also no forestry resources within the city limits of the City of Half Moon Bay, according to the State's Timberland Conservation Program map for Region 3 (CDFW 2018). The area is not suitable to support timber and forestry resources.

Impact Analysis

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

Most of the identified housing sites in the proposed Housing Element Update are within Urban and Built-Up Land as designated by the California Department of Conservation (2022) and not designated farmland. The City has identified a housing site that would be located on land that the California Department of Conservation has mapped as Farmland (Prime and Unique). This site is located just north of the intersection of Main Street and Lewis Foster Drive. The development of residential uses on this site would permanently convert the sites from Farmland.

The aforementioned housing site is within the “Town Center” as delineated on Page 4-5 of the City’s LCP. The LCP states that conversion of prime farmland in the Town Center is supported because the area is served with well-established public infrastructure to support the city’s demand for growth. Policies in the LCP support agricultural preservation and, in areas where growth is necessary to meet demand, mitigation is required for prime agricultural conversion. Policies that reduce impacts to agricultural lands, including Prime Farmland, are discussed below:

- Policy 4-1 Agricultural Preservation.** Ensure the continued viability of agriculture within Half Moon Bay and the Planning Area. This shall include the following:
- a. Protect existing agricultural operations and lands with prime and non-prime agricultural soils located outside of the Town Center, regardless of the underlying land use designation;
 - b. Accommodate the housing needs of farmworkers within the community;
 - c. Promote economic viability within Half Moon Bay by permitting agriculture compatible, supplemental, and ancillary uses that limit direct and cumulative impacts on the longterm productivity of agricultural soils (e.g. minimize soil disturbance and protect soil structure); and
 - d. Acknowledge potential land use compatibility challenges and allow flexibility for agricultural uses with regards to noise, dust, and other aspects of customary agriculture practices.

- Policy 4-3 Incentives for Continued Agricultural Use.** Provide and support incentives for landowners to protect prime and non-prime agricultural lands and to maintain land in productive agricultural use at the landowner’s discretion, including agricultural easements and Williamson Act contracts through an updated ordinance. In review of coastal development permits on lands with such easements or contracts, the City will consider the terms and agreements in their development review.

- Policy 4-4 Farmworker Housing.** Farmworker housing is considered a Coastal Act Priority Use, as well as a Local Priority Use. Encourage a range of farmworker housing including non-permanent housing for seasonal farmworkers and permanent housing through the Workforce Housing Overlay at appropriate affordability levels, densities, and locations on agricultural lands in Rural Coastal and Horticultural Business land use designations. Encourage clustering of farmworker housing where feasible, especially to preserve prime agricultural

soils such that it has the least impact on agricultural production. For agricultural and agricultural compatible uses in Planned Developments, allow for limited on-site affordable employee housing as provided for in the Planned Development designation in Chapter 2. Development.

Policy 4-9

Conversion of Prime and Non-Prime Agricultural Land. Conversion of prime and nonprime agricultural land within the Town Center shall be permitted for anticipated urban development. Prohibit the conversion of prime and non-prime agricultural land outside the Town Center, including as shown on Figure 4-1, to a new non-agricultural use (excluding agricultural compatible and supplemental uses as defined in this chapter) unless all of the following can be demonstrated:

- a. All agriculturally unsuitable lands on the parcel have been developed or determined to be undevelopable;
- b. Continued or renewed agricultural use of the soils is not feasible as defined by Section 30108 of the Coastal Act;
- c. Clearly defined buffer areas shall be provided on the site between the new nonagricultural use and adjacent agricultural uses to ensure the continued productivity of agricultural uses;
- d. The productivity of any agricultural lands adjacent to the new non-agricultural use is not diminished; and e. Public service and facility expansions associated with the new non-agricultural use will not impair agricultural viability, including by increased assessment costs or degraded air and water quality.

Policy 4-10

Mitigation for Conversion of Agricultural Lands. All conversions of prime and non-prime agricultural lands to a new non-agricultural use, excluding farmworker housing, agricultural compatible uses, and supplemental uses as defined in this chapter such as habitat restoration and recreation, shall be mitigated at a ratio to be established based on the quality of agricultural lands converted, their location, and other relevant factors as evaluated in a report prepared by a qualified professional for the City's review and approval. Methods for mitigation may include but are not limited to establishing agricultural conservation easements, soil restoration, or in lieu fees in partnership with land trust and conservation agencies. Protection or restoration of agricultural lands within city limits is preferred; followed by lands within the coastal zone of unincorporated San Mateo County and finally by other coastal zone areas.

Policy 4-12

Division of Agricultural Lands. Division of agricultural lands for conversion to new nonagricultural uses, where such conversion is permitted by Policy 4-9 and excluding farmworker housing provided through the Workforce Housing Overlay, agricultural compatible uses, and supplemental uses as defined in this chapter, shall be restricted as follows:

- a. Division of prime agricultural land within a parcel shall be prohibited unless it can be demonstrated that on-site or adjacent existing or potential agricultural productivity would not be reduced.

- b. Creation of new parcels where the only building site would be on prime agricultural land shall be prohibited.
- c. Recordation of a disclosure statement on any parcel maps, final maps, and all affected parcel deeds shall be required as a condition of approval for division of lands on or adjacent to agricultural land for new non-agricultural uses. The statement shall describe the potential for exposure to customary agricultural practices.

Policy 4-18 Agriculture and Horticulture Runoff and By-Products. In review of any coastal development permit, require that:

- a. Runoff containing fertilizers, pesticides, or other agricultural chemicals is captured, stored, and treated on site or properly disposed;
- b. Compost, processing wastewater, and other by-products are properly disposed of on land or through suitable disposal systems; and
- c. No such runoff or by-products are directly released or disposed of in any perennial or intermittent stream, or sensitive habitat area, and minimized to the extent feasible in any sheet flow or groundwater.

Policy 4-19 Horticulture Uses on Prime and Non-prime Agricultural Lands. Allow new horticulture uses to locate on prime and non-prime agricultural lands provided that permanent structures are sited and designed to preserve prime soils to the extent feasible. Require a soil management plan for new horticulture operations demonstrating how the quality of prime soils will be preserved or how they will be returned to their original condition when operations cease if it is demonstrated that they will not be preserved through development design or standards.

Policy 4-10 in the LUP requires and identifies methods for farmland conversions inside the Town Center to be self-mitigating from the perspective of CEQA. With implementation of these policies, especially Policy 4-10, impacts of the 2023-2031 Housing Element Update on Farmland would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- b. *Would the project conflict with existing zoning for agricultural use or a Williamson Act contract?*
- 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))?*
- d. *Would the project result in the loss of forest land or conversion of forest land to non-forest use?*
- 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?*

As stated above, there are no Williamson Act contracts within city limits of Half Moon Bay. One of the pipeline projects in the Housing Element would be on a site with agricultural zoning; however,

limited residential development on this site may be permitted by the underlying land use designation, which is Rural Coastal with a Workforce Housing Overlay. Additionally, with implementation of General Plan policies listed above, impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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

The LCP states that portions of Half Moon Bay are forested, but that the trees within forested areas are not considered commercial species, and there are no logging operations taking place in Half Moon Bay. Accordingly, these forested areas do not meet the definition of timberland or land zoned for Timberland Production. Most of the housing sites would not be in areas where substantial stands of trees are present. On sites where trees are present, they are often associated with riparian zones, which are protected by LCP policies. Therefore, the 2023-2031 Housing Element update would not impact forestry resources with implementation of the 2023-2031 Housing Element update. There would be no impact.

NO IMPACT

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3 Air Quality

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would implementation of the 2023-2031 Housing Element:				
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?	☐	☐	☒	☐

Setting

Half Moon Bay is in the northwestern area of San Mateo County, which is part of the San Francisco Bay Area Air Basin, and stretches along nearly 85 miles along the Pacific Ocean. The city is located on the San Francisco Peninsula and is surrounded by the Pacific Ocean to the west, Montara Mountain to the north, and the Santa Cruz Mountains and rural undeveloped land to the south.

Half Moon Bay has a Mediterranean climate and its proximity to the ocean helps to produce moderate temperatures year-round, with rainfall concentrated in the winter months. Ocean breezes cool the region in the summer and moderate winter temperatures from reaching freezing or below freezing. Average daytime summer temperatures in the area are usually in the high 60s (Fahrenheit). Nighttime low temperatures during the summer are typically in the high 40s to low 50s, while the winter high temperature tends to be in the high 50s. Characteristic of Half Moon Bay's mild Mediterranean climate, the winter low temperatures are in the 40s. Annual average rainfall in Half Moon Bay is about 26 inches (Western Regional Climate Center 2016).

Overview of Air Pollution

The federal and State Clean Air Acts (CAA) mandate the control and reduction of certain air pollutants. Under these laws, the U.S. Environmental Protection Agency (U.S. EPA) and the California Air Resources Board (CARB) have established the National Ambient Air Quality Standards (NAAQS) and the California Ambient Air Quality Standards (CAAQS) for "criteria pollutants" and other pollutants. Some pollutants are emitted directly from a source (e.g., vehicle tailpipe, an exhaust stack of a factory, etc.) into the atmosphere, including carbon monoxide, volatile organic

compounds (VOC)/reactive organic gases (ROG),⁴ nitrogen oxides (NO_x), particulate matter with diameters of ten microns or less (PM₁₀) and 2.5 microns or less (PM_{2.5}), sulfur dioxide, and lead. Other pollutants are created indirectly through chemical reactions in the atmosphere, such as ozone, which is created by atmospheric chemical and photochemical reactions primarily between ROG and NO_x. Secondary pollutants include oxidants, ozone, and sulfate and nitrate particulates (smog). Air pollutants can also be generated by the natural environment, such as when high winds suspend fine dust particles or when wildfires release fine particulate matter.

Air pollutant emissions are generated primarily by stationary and mobile sources. Stationary sources can be divided into two major subcategories:

- Point sources occur at a specific location and are often identified by an exhaust vent or stack. Examples include boilers or combustion equipment that produce electricity or generate heat.
- Area sources are widely distributed and include such sources as residential and commercial water heaters, painting operations, lawn mowers, agricultural fields, landfills, and some consumer products.

Mobile sources refer to emissions from motor vehicles, including tailpipe and evaporative emissions, and can also be divided into two major subcategories:

- On-road sources that may be legally operated on roadways and highways
- Off-road sources include aircraft, ships, trains, and self-propelled construction equipment

Air Quality Standards and Attainment

The project site is located in the San Francisco Bay Area Air Basin, which is under the jurisdiction of the Bay Area Air District (BAAD). BAAD has jurisdiction over much of the nine-county Bay Area, including some parts of Sonoma County. As the local air quality management agency, the BAAD is required to monitor air pollutant levels to ensure that the NAAQS and CAAQS are met and, if they are not met, to develop strategies to meet the standards. Depending on whether the standards are met or exceeded, the San Francisco Bay Area Air Basin is classified as being in “attainment” or “nonattainment.” In areas designated as non-attainment for one or more air pollutants, a cumulative air quality impact exists for those air pollutants, and the human health impacts associated with these criteria pollutants, presented in Table 2, are already occurring in that area as part of the environmental baseline condition. Under state law, air districts are required to prepare a plan for air quality improvement for pollutants for which the district is in non-compliance. The San Francisco Bay Area Air Basin is designated a nonattainment area for the federal 8-hour ozone standard, federal PM_{2.5} 24-hour standard, state 8-hour and 1-hour ozone standards, state PM₁₀ annual and 24-hour standards, and the state PM_{2.5} 24-hour standard. (BAAD 2017a). This nonattainment status is a result of several factors, such as mobile sources, wood burning, industrial combustion, and dust.

⁴ CARB defines VOC and ROG similarly as, “any compound of carbon excluding carbon monoxide, carbon dioxide, carbonic acid, metallic carbides or carbonates, and ammonium carbonate,” with the exception that VOC are compounds that participate in atmospheric photochemical reactions. For the purposes of this analysis, ROG and VOC are considered comparable in terms of mass emissions, and the term ROG is used in this IS-MND.

Table 2 Health Effects Associated with Non-Attainment Criteria Pollutants

Pollutant	Adverse Effects
Ozone	(1) Short-term exposures: (a) pulmonary function decrements and localized lung edema in humans and animals and (b) risk to public health implied by alterations in pulmonary morphology and host defense in animals; (2) long-term exposures: risk to public health implied by altered connective tissue metabolism and altered pulmonary morphology in animals after long-term exposures and pulmonary function decrements in chronically exposed humans; (3) vegetation damage; and (4) property damage.
Suspended particulate matter (PM ₁₀)	(1) Excess deaths from short-term and long-term exposures; (2) excess seasonal declines in pulmonary function, especially in children; (3) asthma exacerbation and possibly induction; (4) adverse birth outcomes including low birth weight; (5) increased infant mortality; (6) increased respiratory symptoms in children such as cough and bronchitis; and (7) increased hospitalization for both cardiovascular and respiratory disease (including asthma). ¹
Suspended particulate matter (PM _{2.5})	(1) Excess deaths from short- and long-term exposures; (2) excess seasonal declines in pulmonary function, especially in children; (3) asthma exacerbation and possibly induction; (4) adverse birth outcomes, including low birth weight; (5) increased infant mortality; (6) increased respiratory symptoms in children, such as cough and bronchitis; and (7) increased hospitalization for both cardiovascular and respiratory disease, including asthma.

Source: United States Environmental Protection Agency 2016

The 2017 Clean Air Plan, adopted by BAAD as an update to the 2010 Clean Air Plan, provides a regional strategy to protect public health and the climate. To fulfill state ozone planning requirements, the 2017 control strategy includes all feasible measures to reduce emissions of ozone precursors (reactive organic gases [ROG] and nitrogen oxides [NOX]) and reduce transport of ozone and its precursors to neighboring air basins. In addition, the 2017 Clean Air Plan builds upon and enhances the BAAD's efforts to reduce emissions of fine particulate matter and toxic air contaminants (TACs) (BAAD 2017b).

In 2006, the U.S. EPA reduced the national 24-hour PM_{2.5} standard regarding short-term exposure to fine particulate matter from 65 micrograms per cubic meter (µg/m³) to 35 µg/m³. Based on air quality monitoring data for the 2006-2008 cycle showing that the region was slightly above the standard, the U.S. EPA designated the SFBAAB as non-attainment for the 24-hour national standard in December 2008. This triggered the requirement for the BAAD to prepare a State Implementation Plan (SIP) submittal to demonstrate how the region would attain the standard. However, data for both the 2008-2010 and the 2009-2011 cycles showed that PM_{2.5} levels in the Basin met the standard. On October 29, 2012, the U.S. EPA issued a proposed rule-making to determine that the SFBAAB now attains the 24-hour PM_{2.5} national standard. Based on this, the SFBAAB was required to prepare an abbreviated SIP submittal, which includes an emission inventory for primary (directly-emitted) PM_{2.5}, as well as precursor pollutants that contribute to formation of secondary PM in the atmosphere; and amendments to BAAD New Source Review (NSR) to address PM_{2.5} (adopted December 2012). However, key SIP requirements to demonstrate how the region will achieve the standard (i.e., the requirement to develop a plan to attain the standard) will be suspended as long as monitoring data continues to show that the SFBAAB attains the standard. In addition to preparing the abbreviated SIP submittal, the BAAD has prepared a report entitled Understanding Particulate Matter: Protecting Public Health in the San Francisco Bay Area (BAAD 2012). The report helps guide the BAAD's on-going efforts to analyze and reduce PM in the Bay Area in order to better protect

public health.⁵ The SFBAAB will continue to be designated as nonattainment for the federal 24-hour PM_{2.5} standard until such time as the BAAD elects to submit a “redesignation request” and a “maintenance plan” to the U.S. EPA, and the U.S. EPA approves the proposed redesignation.

Impact Assessment

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

The air quality plan applicable to Half Moon Bay is the 2017 Clean Air Plan developed by the BAAD (BAAD 2017b). The 2017 Clean Air Plan focuses on protecting air quality in the Basin through two primary goals:

- Protect air quality and health at the regional and local scale by attaining all state and national air quality standards and eliminating disparities among Bay Area communities in cancer health risk from toxic air contaminants; and
- Protect the climate by reducing Bay Area GHG emissions to 40 percent below 1990 levels by 2030, and 80 percent below 1990 levels by 2050.

In order to achieve these goals, the 2017 Clean Air Plan includes air quality control measures to reduce emissions from different major sources of emissions, including stationary sources, transportation, energy, buildings, agriculture, natural and working lands, waste management, water, and super-greenhouse gas (GHG) pollutants. Under BAAD’s methodology, a determination of consistency with the 2017 Clean Air Plan should demonstrate that a project (BAAD 2017b):

- Supports the primary goals of the 2017 Clean Air Plan;
- Includes applicable control measures from the 2017 Clean Air Plan; and
- Would not disrupt or hinder implementation of a control measure in the 2017 Clean Air Plan.

The 2017 Clean Air Plan control measures that are applicable to the project, based on the residential character of the Housing Element, are presented in Table 3. Table 3 also provides a brief description of whether the project would be consistent with each control measure and why.

⁵ PM is made up of particles that are emitted directly, such as soot and fugitive dust, as well as secondary particles that are formed in the atmosphere from chemical reactions involving precursor pollutants such as oxides of nitrogen, sulfur oxides, volatile organic compounds, and ammonia.

Table 3 BAAD Clear Air Plan Control Measures Consistency Analysis

Control Measure Name	Control Measure Description	Consistency Analysis
Decrease Electricity Demand	Work with local governments to adopt additional energy efficiency policies and programs. Support local government energy efficiency program via best practices, model ordinances, and technical support. Work with partners to develop messaging to decrease electricity demand during peak times.	Consistent. The residential development envisioned in the 2023-2031 Housing Element Update would be required to comply with Building Energy Efficiency Standards (Municipal Code Title 24), which would help reduce energy consumption.
Green Buildings	Collaborate with partners such as KyotoUSA to identify energy-related improvements and opportunities for onsite renewable energy systems in school districts; investigate funding strategies to implement upgrades. Identify barriers to effective local implementation of the CALGreen (Title 24) statewide building energy code; develop solutions to improve implementation/ enforcement. Work with ABAG's BayREN program to make additional funding available for energy-related projects in the buildings sector. Engage with additional partners to target reducing emissions from specific types of buildings.	Consistent. The residential development envisioned in the Housing Element Update would be required to comply with CALGreen and the most recent California Building Code. Compliance with these state requirements would increase building efficiency over standard construction.
Support Water Conservation	Develop a list of best practices that reduce water consumption and increase on-site water recycling in new and existing buildings; incorporate into local planning guidance.	Consistent. The residential development envisioned in the Housing Element Update would be required to adhere to State and local policies to conserve water, including, but not limited to, AB 1668: Water Conservation and Drought Planning, AB 2731: Landscape Water Use Efficiency, implementation of a stormwater control plan.

Note: Control measures unrelated to residential land uses, such as control measures pertaining to agricultural and industrial land uses are not included.

Source: BAAD 2017b

As shown in Table 3, the 2023-2031 Housing Element Update would be consistent with control measures applicable to residential land uses and residential development. The Housing Element Update would also support goals and objectives on the 2017 Clean Air Plan, such as promoting active transportation as alternatives to vehicle travel. For example, many of the housing sites included in the 2023-2031 Housing Element Update are located in or close to the downtown area of Half Moon Bay. Sidewalks and the abundance of retail and services downtown would facilitate active transportation amongst future residents of development at these sites. Accordingly, impacts of the 2023-2031 Housing Element Update related to conflicts with or obstructions to the implementation of the applicable air quality plan would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- 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?*

This analysis utilizes thresholds recommended by the BAAD to determine the significance of air quality impacts resulting from the proposed Housing Element Update. The BAAD thresholds are described in *California Environmental Quality Act Air Quality Guidelines*, which the BAAD adopted in 2022 (BAAD 2022). According to the 2022 Air Quality Guidelines, a General Plan or a General Plan Element, such as the proposed Housing Element Update would result in less than significant impacts related to criteria pollutant emissions if both of the following thresholds are satisfied:

- Plan/Element is consistent with the current air quality plan control measures.
- VMT resulting from the Plan/Element is less than or equal to the projected population increase resulting from the Plan/Element.

As described and analyzed above in Table 3, the proposed Housing Element update would be consistent with the applicable control measures of the 2017 Clean Air Plan, which is the current air quality plan for the City of Half Moon Bay. Therefore, the proposed Housing Element would satisfy the first of the two thresholds provided by the BAAD.

VMT refers to vehicle miles traveled and is analyzed in detail in Section 17, *Transportation*. As described therein, VMT in Half Moon Bay and the other nearby coastal communities is currently estimated at 20.56 VMT per capita. In 2040, with implementation of the proposed Housing Element, the VMT per capita would be 18.58. Accordingly, VMT per capita would decrease compared to existing conditions, while population continues to increase (see Section 14, *Population and Housing*). Accordingly, the VMT resulting from the proposed Housing Element would be less than the projected population increase. Because the proposed Housing Element would satisfy both BAAD thresholds pertaining to criteria pollutants, impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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

The 2023-2031 Housing Element would facilitate residential development throughout the city on various the housing sites. These would include increased density and infill on sites currently zoned for commercial-residential mixed-use, light industrial, and residential. Potential pollutants would include those that occur throughout the city. The BAAD defines typical sensitive receptors as residences, schools, playgrounds, childcare centers, athletic facilities, hospitals, long-term health care facilities, rehabilitation centers, convalescent centers, and retirement homes. Many of these land use types are present in Half Moon Bay, with some being proximate to the housing sites. However, some of these land use types are not present in Half Moon Bay, such as hospitals.

Residential development does not usually produce substantial pollutants and thus implementation of projects under the 2023-2031 Housing Element would not expose sensitive receptors to these pollutants in substantial measure. Nonetheless, individual projects could expose occupants of residential uses to industrial pollution if infill development occurred in proximity to industrial uses, and sensitive users could be exposed to higher levels of pollutant concentrations. Individual projects would undergo project-specific City review to determine if nearby uses would expose residential uses to source pollutants in excessive amounts. Furthermore, all projects would be required to be consistent with 2020 Local Coastal LUP policies that improve air quality, including development that requires energy efficient design, including the following:

- Policy 2-24 Infrastructure Capacity and Design.** Design public infrastructure, including water, sewer, stormwater management, communications, energy, and transportation systems meet the needs of anticipated development without inducing growth, support new technology, and shift away from fossil fuels. Infrastructure shall be designed according to best practices for sustainability, maintenance, aesthetics, resilience, and durability. As applicable, new infrastructure shall be undergrounded.

In addition, non-conforming uses that have potential to expose sensitive receptors to toxic air, are subject to standards and policies of the LUP, including the following:

- Policy 2-4 Sustainable Land Use Pattern.** Concentrate new development within the defined Urban Boundary by prioritizing development in the Town Center, allowing for infill development within established neighborhoods, and protecting the rural, open space, agricultural and habitat values of undeveloped areas.
- Policy 2-12 Non-Conforming Uses.** Update the non-conforming uses implementation regulations in the IP to address standards for non-conforming uses and development with respect to land use, environmental hazards, and biological resources. Uses and development that were lawful at the time they were established may continue under the policies of this LUP unless the use is discontinued for a period of up to five years for agricultural uses, and up to one year for all other uses.

Adherence to City regulations and General Plan goals and policies listed above would reduce impacts to less than significant.

LESS THAN SIGNIFICANT IMPACT

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

The BAAD identifies uses that may require mitigation due to substantial odor, including industrial production and agricultural uses. Residential land uses are not identified as uses that create objectionable odors. The proposed Housing Element pertains to residential development. Therefore, the project would not generate objectionable odors affecting a substantial number of people. Residential land uses may generate short-term and localized odors, such as the smell of mowed lawns or outdoor cooking activities, which some people may find objectionable. However, these odors would not be constant or affect substantial numbers of people. Impacts would be less than significant.

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4 Biological Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would implementation of the 2023-2031 Housing Element:				
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 Wildlife 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, or regulations, or by the California Department of Fish and Wildlife or U.S. 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?	☐	☐	☐	☒

Setting

Special-Status Species

Special-status species are those plants and animals listed, proposed for listing, or candidates for listing as Threatened or Endangered by the United States Fish and Wildlife Service (USFWS) under the Federal Endangered Species Act. Several special-status plant species are known to occur or have the potential to occur in Half Moon Bay or nearby, including Choris's popcornflower and perennial goldfields. Similarly, numerous special-status bird, mammal, fish, and reptile species are found in or near Half Moon Bay, including Western Snowy Plover, the California Brown Pelican, Central California Coast Steelhead, and California Red-legged Frog. In addition, the Monarch Butterfly will migrate from Canada to Mexico and use winter roost sites, typically used between October and February, and consist of hundreds or thousands of monarchs in wind-protected tree groves close to sources of nectar and water. In Half Moon Bay, three small Monarch overwintering sites have been identified, two along Frenchmans Creek, and one in the Wavecrest area (Half Moon Bay 2020a). Additionally, the grasslands, coastal terrace prairie, and wetlands for foraging, shrubs for cover, and large population of California voles provide wintering raptors the most important habitat, where the local Audubon chapter (Sequoia Audubon Society) considers Wavecrest to be the most important habitat for wintering raptors in San Mateo County. Both CDFW and the Coastal Commission have recognized the importance of these populations and the need to conserve this area for raptors. Several of the raptor species are state designated species of concern or USFWS Bird Species of Conservation Concern for both nesting and wintering habitat, including Golden Eagle, Ferruginous Hawk and Merlin. Merlin are seen on the bluffs every year, and the fields of Wavecrest and the area west of Railroad Avenue are an important wintering habitat for this species (Half Moon Bay 2020a).

Wildlife Corridors

Wildlife corridors are generally defined as connections between habitat patches that allow for physical and genetic exchange between otherwise isolated animal populations. Such linkages may serve a local purpose, such as between foraging and denning areas, or they may be regional in nature, allowing movement across the landscape. Some habitat linkages may serve as migration corridors, wherein animals periodically move away from an area and then subsequently return.

Pilarcitos Creek and Frenchmans Creek are historic spawning streams for Central California Coast Steelhead (Half Moon Bay 2020a). Arroyo Leon, a perennial stream, is a well-developed riparian canopy and Critical Habitat for Central California Coast Steelhead (Half Moon Bay 2020a).

Clean Water Act

Section 401 of the Clean Water Act regulates discharges of fill and dredged material to waters of the United States. Under Section 401, the SWRCB and RWQCBs have regulatory authority over actions in waters of the United States through the issuance of water quality certifications, which are issued in conjunction with any federal permit (e.g., permits issued by the USACE under Section 404 of the Clean Water Act, described below). Section 401 provides the SWRCB and the RWQCBs with the regulatory authority to waive, certify, or deny any proposed activity that could result in a discharge to surface waters of the State. To waive or certify an activity, these agencies must find the proposed discharge would comply with State water quality standards, including those protecting beneficial uses and water quality. If these agencies deny the proposed activity, the federal permit cannot be issued.

Section 404 of the Clean Water Act requires a permit be issued by USACE before dredged or fill material may be discharged into waters of the United States, unless the activity is exempt from Section 404 regulations (e.g. farming activities, maintenance activities, construction of temporary sedimentation basins, construction and maintenance of forest roads or temporary mining roads). Waters of the United States generally include tidal waters, lakes, ponds, rivers, streams (including intermittent streams), and wetlands (with the exception of isolated wetlands).

Avian Protection Laws

California Fish and Game Code sections 3503, 3503.5, and 3513 describe unlawful take, possession, or destruction of native birds, nests, and eggs. Section 3503.5 of the Code protects all birds-of-prey and their eggs and nests against take, possession, or destruction of nests or eggs. Section 3513 makes it a state-level offense to take any bird in violation of the federal Migratory Bird Treaty Act.

Impact Analysis

- a. *Would the project 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 Wildlife or U.S. Fish and Wildlife Service?*

The housing sites proposed in the 2023-2031 Housing Element consist mostly of infill development in areas already developed with urban uses. They are generally located away from riparian and other sensitive habitats that could support special-status species. However, some of the housing sites, such as one located south of Pilarcitos Creek and east of Highway 1, are located on undeveloped land. Development of these sites with residential uses would have the potential to impact special-status species. For example, construction of housing would require grading, which could directly remove special-status plants, if present. However, residential development on one of these sites, Site D, was previously evaluated for environmental impacts pursuant to CEQA, and mitigation was adopted to avoid impacts to the special status species (see the 320 Church Street Initial Study-Mitigated Negative Declaration, State Clearinghouse Number 2012032035). A biological resources evaluation has been completed for the other site adjacent to the creek, and the evaluations includes recommendations for avoidance of the riparian habitat, where special status species would potentially occur. The City has committed to incorporating the recommendations of the biological resources evaluation into the pending CEQA analysis for the development on this site. These measures would avoid impacts to special status species. Additionally, the LCP includes several policies that would reduce or prevent potential impacts to special-status species. These policies include:

- Policy 6-7** **Preliminary Biological Inventory.** Require that proposals for development within or adjacent to areas with potential to support or contain sensitive plant or animal species, including mapped Potential ESHA and unmapped areas where determined necessary, include a preliminary inventory conducted by a qualified biologist of habitat types and plant and animal species present and likely to be present (e.g. seasonally) on the project site for the development review process. If the preliminary inventory indicates the presence or potential for sensitive species or habitat on the project site, a detailed biological study shall be required pursuant to Policy 6-8.

Policy 6-8

Biological Study. For development proposed in and adjacent to ESHA and projects for which the preliminary biological inventory indicates the presence or potential for sensitive species or habitat, require the preparation of a detailed biological study by a City-approved, qualified professional to be submitted prior to development review and prior to any ground disturbance. The report shall assess site conditions typically within 200 feet of the proposed development; identify if site conditions meet the LCP's definition of ESHA; determine if significant direct or cumulative impacts to the ESHA, to the special status species supported by the ESHA, or to on- or off-site biological productivity and ecosystem functionality may occur from the proposed development; and recommend the most feasible avoidance and/or mitigation measures if impacts may occur. At minimum, the study shall also provide and discuss the following if ESHA is present and if applicable to site conditions:

- a. For animals and avian species: Requirements for food, water, nesting or denning sites and requirements for reproduction, predation, dispersal, refugia, and migration;
- b. For plants: Life histories, and requirements for soils, climate, and geography;
- c. A map depicting the locations of plants or animals and/or their habitats;
- d. Recorded observations of special status species from reputable databases such as the California Natural Diversity Database;
- e. Site topography, drainage patterns, soil permeability, and depth to water table;
- f. Unique site conditions, such as vegetation, natural topography, or built features (e.g. roads, structures) that provide a physical barrier between the proposed development and the ESHA;
- g. The likelihood of increased human activity and disturbance resulting from the project relative to existing development;
- h. An evaluation by a qualified professional of the ESHA's vulnerability to sea level rise impacts (e.g. sensitivity to inundation and seawater intrusion) and ability for adaptation (e.g. inland migration) for projects located within 300 feet of the beach or bluff edge, or where otherwise appropriate based on based available science for inundation projections;
- i. A recommendation of the need to conduct a wetland delineation if site conditions indicate the presence or potential for wetland species or indicators;
- j. Recommended avoidance and/or mitigation measures if the proposed development has potential to impact any on- or off-site sensitive habitat areas or special status species during or post-construction; and
- k. Recommended buffer widths based on the applicable buffer policies in this chapter, site-specific conditions, and sensitivity and resilience of the ESHA to disturbance from the proposed development and from anticipated sea level rise impacts, where applicable. Where a reduced buffer zone is proposed, a recommendation of whether the reduced buffer zone would provide equivalent protection of the biological integrity of the site's

sensitive habitats and special status species given the site-specific characteristics of the resource(s) and of the type and intensity of proposed development. Studies shall be made public and subject to review and comments by jurisdictional agencies and the public concurrently.

- Policy 6-12 Development Alternatives** Development shall be sited and designed to avoid impacts to terrestrial ESHA, wetlands, and watercourses. If there is no feasible alternative (e.g. with respect to siting, size, or design) that can eliminate all impacts, the City shall consider whether there are any alternatives to the proposed development that achieve most of the same goals but would have fewer and less significant impacts. If such an alternative exists, the City shall either deny the proposed development or approve the alternative. Impacts that cannot be avoided shall be fully mitigated.
- Policy 6-16 Terrestrial ESHA Buffer Zones.** Require buffer zones (i.e., areas between terrestrial ESHA and proposed development) of sufficient size to ensure the biological integrity and preservation of the habitat they are designed to protect. Maintain buffers with native vegetation to serve as transitional habitat and provide distance and physical barriers to human intrusion. Terrestrial ESHA (including the marine environment, sea cliffs, dunes, coastal terrace prairie, and non-aquatic habitat for special status or unique species) shall have a minimum buffer width of 100 feet from proposed development. Larger buffers may be required if site-specific evidence indicates that a larger buffer is necessary to maintain biological integrity and to protect the ESHA against impacts of proposed development. Terrestrial ESHA buffers may be reduced only where the following can be demonstrated through evidence provided by site-specific evaluation pursuant to Policy 6-8.
- Policy 6-32 Special Status Species.** Define special status species as species that are listed or are proposed for listing as rare, threatened, endangered, or of special concern by the federal and/or state government. Maintain a list of special status species with potential to be found in the Planning Area and develop guidelines for their protection and management. In the event that a special status species with potential to occur in the Planning Area is delisted, consider designation of the species as a unique species.
- Policy 6-56 Open Space Requirements.** Require a conservation easement, deed restriction, or other comparable mechanism through a condition of approval for proposed development to protect ESHAs, wetlands, watercourses, and their buffer zones.
- Policy 6-61 Animal Crossings.** Require that new structures such as highways, medians, bridges, culverts, and other development are designed to facilitate movement of animals.
- Policy 6-63 Construction and ESHA.** Ensure that construction does not adversely impact sensitive bird or other animal species in on-site or nearby ESHA, wetlands, or watercourses by requiring construction projects to implement best management practices (e.g. pre-construction surveys, construction and/or tree removal timing restrictions, exclusionary fencing), and, as appropriate based on project scope and site conditions, noise and vibration reduction measures and monitoring by a qualified biologist during construction.

Policy 6-65 Bird-Safe Building Design. Require new or renovated buildings to provide bird-safe building design features such as façade treatments, limited use of reflective building surfaces, appropriate locations for landscaping and water treatments, restricted use of guy wires, means to reduce light pollution, and other treatments to reduce bird strikes as accepted by the City.

Adherence to the 2020 LCP policies listed above would minimize impacts from potential direct effects to special-status species because they would ensure development in the housing sites would avoid or reduce impacts to special-status species and their habitat. Furthermore, residential development envisioned in the 2023-2031 Housing Element would be required to comply with federal and State regulations, such as the California Fish and Game Code, that protect special-status species and their habitats. Projects would be subject to policies in the LCP.

Although the aforementioned policies and mandatory compliance with regulations and permits would reduce potential impacts to special-status species, residential development would require tree removal and vegetation clearing that could impact migratory nesting birds. Impacts to migratory nesting birds, such as causing mortality of the birds or causing birds to abandon an active nest, would be a violation of the Migratory Bird Treaty Act and a potentially significant impact. Implementation of Mitigation Measure BIO-1 is required.

Mitigation Measures

BIO-1 Nesting Bird Protection

If construction of residential development envisioned in the 2023-2031 Housing Element Update requires vegetation trimming or tree removal during the nesting bird season (February 1 to August 31), pre-construction surveys shall be conducted by a qualified biologist not more than one week before construction to determine the presence or absence of nesting birds on the project site. The survey shall be repeated if a lapse occurs in construction activity of two weeks or more. If active nests are found, the qualified biologist shall establish an appropriate buffer, accounting for species sensitivity and the physical location of the nest (line of sight to the work area) to comply with California Fish and Game Code Sections 3503 and 3503.5. In no case shall the buffer be smaller than 50 feet for passerine species and 200 feet for raptor species. To prevent encroachment, the established buffer(s) shall be clearly marked using high-visibility material. Encroachment into the buffer shall be prohibited unless approved by the qualified biologist with adequate restrictions, protections, and/or monitoring to ensure that impacts to the nest are avoided. The established buffer(s) shall remain in effect until the young have fledged or the nest is abandoned.

With implementation of Mitigation Measure BIO-1 and the applicable LCP policies, impacts on special-status species would be reduced to less than significant.

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

Most of the housing sites contained in the proposed Housing Element Update are infill sites that do not contain riparian habitat or other sensitive natural communities identified in the LCP, such as sea cliffs, dunes, coastal terrace prairie, wetlands, perennial and seasonal freshwater marsh, watercourses, riparian corridors, non-riparian watercourses, and man-made impoundments and

ponds. However, some of the housing sites are not infill or are located adjacent to creeks, or both. Residential development on these sites would have the potential to impact riparian habitat or other listed sensitive natural communities.

The LCP contains the following policies that would reduce or avoid potential impacts to riparian habitat and sensitive natural communities:

- Policy 6-5 Protection of Illegally Degraded ESHA.** Any area mapped as ESHA or otherwise determined to have previously been ESHA shall not be deprived of the LCP's ESHA protections on the basis that, illegally and/or without a permit, habitat has been removed, filled, or degraded, or species that are rare or especially valuable because of their nature or role in an ecosystem have been eliminated.
- Policy 6-14 Resource Management Agencies.** Uses and activities permitted in ESHA may be subject to review and approval by the U.S. Army Corps of Engineers, San Francisco Bay Regional Water Quality Control Board, California Coastal Commission, California Department of Fish and Wildlife, U. S. Fish and Wildlife Service, National Marine Fisheries Service, and other resource management agencies, as applicable. Compliance with any applicable state or federal regulations is required.
- Policy 6-16 Permitted Uses in Terrestrial ESHA and Terrestrial ESHA Buffers.** Terrestrial ESHAs (including the marine environment, sea cliffs, dunes, coastal terrace prairie, and non-aquatic habitat for special status or unique species) shall be protected against significant disruption of habitat values. Only uses dependent on the resources within these areas and their buffer zones (i.e. habitat management and restoration, scientific research and educational activities, and low-intensity public access and recreation) shall be allowed there. Development in areas adjacent to terrestrial ESHAs shall be sited and designed to prevent impacts that would significantly degrade the habitat or recreation value of those areas, and shall be compatible with the continuance of those habitat areas. Temporary disruption (e.g. less than six months) for the construction, alteration, repair, and maintenance of existing or newly permitted facilities or structures is allowed if there are no feasible alternatives and the disruption is repaired and restored to at least an equivalent condition within one year.
- Policy 6-18 Standards in Terrestrial ESHA and Terrestrial ESHA Buffers** Site and design new development permitted in or adjacent to terrestrial ESHA to avoid adverse impacts to ESHA. Methods for avoiding impacts include, but are not limited to utilizing raised boardwalks, installing informative signage and exclusion fencing, and implementing construction best management practices.
- Policy 6-48 Standards in Riparian Corridors.** Require new development permitted in riparian corridors to adhere to the following standards:
- a. Minimize removal of native vegetation;
 - b. Minimize land exposure during construction and use temporary vegetation or mulching to protect critical areas;
 - c. Minimize erosion, sedimentation, and runoff by appropriately grading and replanting modified areas with native species;

- d. Use only native plant species when replanting, and monitor replanted species and replace as necessary to ensure establishment;
- e. Provide sufficient passage upstream and downstream for native and anadromous fish as specified by the California Department of Fish and Wildlife and the National Marine Fisheries Service;
- f. Minimize adverse effects of waste water discharges and entrainment;
- g. Prevent depletion of groundwater supplies and substantial interference with surface and subsurface water flows;
- h. Encourage wastewater reclamation;
- i. Maintain natural vegetation buffer areas that protect riparian habitats;
- j. Minimize alteration of natural streams;
- k. Conform with Chapter 7. Environmental Hazards policies for minimizing risks and avoiding contribution to flood and erosion hazards;
- l. Maintain hydrologic function and sediment transport function of drainages; and
- m. Provide mitigation and long-term monitoring and reporting for any adverse impacts incurred upstream or downstream as a result of permitted development.

The housing sites adjacent to the creek (Pilarcitos Creek) have been planned to avoid impacts to the riparian habitat associated with the creek. Residential development on one of these sites, Site D, was previously evaluated for environmental impacts pursuant to CEQA (State Clearinghouse Number 2012032035), and mitigation was adopted to avoid impacts to the riparian habitat. A biological resources evaluation has been completed for the other site adjacent to the creek, and the evaluation includes recommendations for avoidance of the riparian habitat. The City has committed to incorporating the recommendations of the biological resources evaluation into the pending CEQA analysis for the development on this site.

Adherence to these policies and other applicable regulations, such as the California Fish and Game Code, as well as adopted CEQA mitigation measures would ensure that project impacts to riparian habitat and other sensitive natural communities would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- 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?*

Wetlands in Half Moon Bay are typically associated with ocean, sandy beach, and small estuaries at the mouths of major creeks (Half Moon Bay 2020a). No housing sites are proposed in such areas. Wetlands may also be associated with ditches and/or abandoned agricultural ponds, which is the case for three housing sites. The housing site adjacent to the ditch (which is located within a public right-of-way) would be subdivided to isolate the ditch into a parcel not subject to residential development, compliant with the LUP. The ditch and the agricultural ponds are considered wetlands, which would be subject to 100-foot protective buffers pursuant to LUP Policy 6-41. Development construction could result in indirect impacts pertaining to water quality in nearby wetlands and those that may occur downslope or downstream of construction zones. These impacts are discussed in Section 10, *Hydrology and Water Quality*, of this Initial Study.

The LUP contains strategies and policies aimed at protecting and maintaining wetlands in Half Moon Bay, as discussed under Threshold b, above. Because no specific development proposals are included in the 2023-2031 Housing Element, specific impacts to wetlands cannot be ascertained at this time. All development implemented under the 2023-2031 in areas where potential wetlands could be affected will be required to undergo a project-level analysis, as required under CEQA.

Policy 6-37 *Wetland Delineation* of the LUP would determine the presence or absence of wetlands and other federally regulated waters as described in Section 404 of the Clean Water Act (CWA). Development facilitated by the 2023-2031 Housing Element would be required to adhere to local, State, and federal regulations regarding protected wetlands. Wetland areas have the potential to support riparian and streambed species and habitats, which are regulated by the California Department of Fish and Wildlife (CDFW). Depending on the acreage of project disturbance, individual development facilitated by the 2023-2031 Housing Element would be required to obtain either a Nationwide or Individual permit from the United States Army Corps of Engineers (USACE), pursuant to CWA Section 404, prior to obtaining a grading permit. This would require developers to obtain a Water Quality Certification from the San Francisco Bay Regional Water Quality Control Board (RWQCB) pursuant to CWA Section 401. Further discussion on project impacts to water quality are discussed in Section 10, Hydrology and Water Quality.

Projects implemented under the 2023-2031 Housing Element would be required to comply with local, State, and federal policies aimed at protecting wetlands. This and adherence to the strategies and policies in the LUP including development alternatives that would avoid impacts to wetlands, would reduce impacts to state or federally protected wetlands to less than significant levels. Examples of applicable LUP policies that would reduce impacts to wetlands include:

- Policy 6-36** **Wetlands Definition.** Wetlands shall be defined according to the single-parameter definition in Section 30121 of the Coastal Act and Section 13577(b) of the Coastal Commission's Regulations. Wetlands shall include land where the water table is at, near, or above the land surface long enough to promote the formation of hydric soils or to support the growth of hydrophytes. Wetlands may also include land where vegetation is lacking and soil is poorly developed or absent as a result of frequent and drastic fluctuations of surface water levels, wave action, water flow, turbidity or high concentrations of salts or other substances in the substrate. Such wetlands can be recognized by the presence of surface water or saturated substrate at some time during each year and their location within, or adjacent to, vegetated wetlands or deep-water habitats.
- Policy 6-37** **Wetland Delineation.** Require a survey, data forms, and analysis with the delineation of all wetland areas when a preliminary biological inventory or biological study indicates the presence or potential for wetland species or indicators. Wetland delineations should typically be conducted during the rainy season and must be conducted in accordance with Policy 6-36. Wetlands Definition, the definitions of wetland boundaries contained in section 13577(b) of the California Code of Regulations, and applicable guidance from the California Coastal Commission.
- Policy 6-38** **Wetland Condition.** The condition of a wetland does not affect its regulatory status as a defined wetland pursuant to the Coastal Act. Thus, poorly functioning or degraded areas that meet the definition of wetlands are subject to the LCP's wetland protection policies, including if illegally removed per Policy 6-5.

- Policy 6-39** **Wetland Protection.** Protect and, where feasible, restore the biological productivity and the quality of wetlands for both on- and off-site benefits.
- Policy 6-40** **Permitted Uses in Wetlands.** Permit the diking, filling, or dredging of wetlands only where there is no feasible, less environmentally damaging alternative and where feasible mitigation measures will be implemented to minimize adverse environmental effects, and only for the following uses:
- a. Education and research activities;
 - b. Public trails;
 - c. Habitat restoration and fish and wildlife management activities; and
 - d. Incidental public service purposes, including but not limited to, burying cables and pipes or inspection of piers, maintenance of existing intake and outfall lines, and emergency repairs.
- Other uses specified in Section 30233 of the Coastal Act may only be allowed pursuant to an LCP amendment.
- Policy 6-41** **Wetland Buffer Zones.** Wetland buffer zones for proposed development shall extend a minimum of 100 feet landward from the edge of the delineated wetland. A larger buffer may be required based on site-specific evidence that a larger buffer is necessary to protect the functional capacity of the wetland ecosystem or to protect any sensitive species from the impacts of proposed development. A wetland buffer may be reduced to less than 100 feet only where the following can be demonstrated through evidence provided by site-specific evaluation pursuant to Policy 6-8, and only as specified below:
- a. Where the only building site is located entirely within the required buffer; no alternative development site, size, or design is feasible; and the proposed development is compatible with the continued viability of the adjacent wetland, including protection of any sensitive species: the buffer may be reduced to no less than 20 feet provided that design alternatives that maximize the buffer width are utilized; or
 - b. Where the only building site is not located entirely within the required buffer; no alternative development site, size, or design is feasible to accommodate the development entirely outside the required buffer; no new adverse impacts to the wetland will occur; and the reduced buffer would provide equivalent protection of wetland resources, as conclusively demonstrated by a professional biologist to the satisfaction of the City and all jurisdictional regulatory agencies: the buffer may be reduced to no less than 50 feet.
- Policy 6-42** **Permitted Uses within Wetland Buffer Zones.** Within wetland buffer zones, permit only the following uses:
- a. Uses allowed within wetlands pursuant to Policy 6-40;
 - b. Public scenic overlooks;
 - c. Existing agricultural uses;

- d. New agricultural uses, provided that they prevent impacts on the adjacent wetlands and protect the function of the buffer;
- e. Temporary disruption (e.g. less than six months) for the construction, alteration, repair and maintenance of existing or newly permitted facilities or structures if there are no feasible alternatives and the disruption is repaired and restored to at least an equivalent condition; and
- f. Native landscaping

Policy 6-43 Standards in Wetlands and Wetland Buffer Zones. Require that development permitted in wetlands and wetland buffer zones minimizes adverse impacts during and after construction. Specifically, require that:

- a. All construction which alters wetland vegetation is required to replace the vegetation including “no action” in order to allow for natural reestablishment and pursuant to applicable mitigation requirements;
- b. All construction takes place during daylight hours;
- c. All paths are elevated (e.g. boardwalks) so as not to impede movement of water, not to compact soil, and otherwise not to disturb wetland plants and animals;
- d. All outdoor lighting is prohibited within wetlands, minimized in the wetland buffer zone, and down-cast and directed away from any wetland so as to not affect wildlife;
- e. Noise from motorized machinery is kept to less than 45-dBA at the wetland boundary, except for farm machinery;
- f. No herbicides are used in wetlands and wetland buffer zones unless there are no feasible alternatives and as specifically approved by the County Agricultural Commissioner and all jurisdictional regulatory agencies; and
- g. Any permit for development includes necessary mitigation, monitoring, reporting and maintenance programs.

Policy 6-44 Sediment Restoration. Require that any restoration projects facilitate the delivery of clean, dredged sediment for areas where existing wetlands are or may become sediment-limited due to sea level rise.

Policy 6-45 Man-Made Ponds and Impoundments. No buffer is required for man-made agricultural ponds and impoundments actively used within the last five years or for man-made non-agricultural ponds and impoundments actively used within the last one year where such features are part of allowed development or operation or were constructed prior to enactment of the Coastal Act. Implementation of best management practices and avoidance measures for any biological resources are encouraged for the continued use, repair, and maintenance of active ponds and impoundments. Development proposed within or adjacent to non-active ponds and impoundments may require a preliminary biological inventory per Policy 6-7 or a biological study per Policy 6-8 and be subject to ESHA protection and buffer requirements as applicable.

LESS THAN SIGNIFICANT IMPACT

- 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?*

To protect the viability and integrity of the stream resources discussed above in *Setting*, the LUP contains policies for conservation and restoration, and include buffer areas, protective easements and deed restrictions, open space land use designations, and development restrictions. However, mitigation is required under the Coastal Act for allowable impacts to habitat areas and can provide a chance for restoration. Where development projects fall within the Critical Habitat buffer zones, on-site mitigation is preferred.

Two housing sites in the Housing Element Update occur near or adjacent to Pilarcitos Creek and are currently undeveloped areas. The housing sites adjacent to the creek (Pilarcitos Creek) have been planned to avoid impacts to the riparian habitat associated with the creek. Residential development on one of these sites was previously evaluated for environmental impacts pursuant to CEQA, and mitigation was adopted to avoid impacts to the riparian habitat. A biological resources evaluation has been completed for the other site adjacent to the creek, and the evaluations includes recommendations for avoidance of the riparian habitat. The City has committed to incorporating the recommendations of the biological resources evaluation into the pending CEQA analysis for the development on this site as mitigation. The IS-MND and Mitigation Monitoring and Reporting Program for the project on this site was adopted in November 2017 (State Clearinghouse Number 2012032035). Additionally, sites that would involve development on or near the riparian habitats, such as these two sites near Pilarcitos Creek, would be subject to adherence to the LUP policies described under Impact B above, specifically Policy 6-48 which would mitigate impacts to riparian habitats. In addition, the following LUP policies would also apply to wildlife movement and corridors:

- | | |
|--------------------|---|
| Policy 6-15 | Wildlife Corridors. Preserve, protect, and enhance wildlife corridors, including watercourses, connecting ESHA and open space areas to allow for seasonal migration as well as daily movements for foraging and dispersal. |
| Policy 6-49 | Riparian Corridor Buffers. Buffer zones shall be required for development proposed along both sides of riparian corridors to provide habitat protection and space for meander belts and vegetation growth. Riparian buffer zones shall apply as follows: a. For all perennial watercourses (i.e. Pilarcitos Creek, Frenchmans Creek, Arroyo Leon, and Arroyo Cañada Verde west of Highway 1) and certain intermittent watercourses (i.e. Kehoe Watercourse and Wavecrest Arroyo): buffer zones shall extend a minimum of 50 feet from the outer limit of the riparian vegetation or 100 feet from the top of bank, whichever is greater. b. For all other intermittent and ephemeral watercourses with riparian vegetation (e.g. Roosevelt Creek, the riparian corridor in the northwestern area of Ocean Colony, and Arroyo Cañada Verde east of Highway 1): buffer zones shall extend a minimum of 35 feet from the outer limit of riparian vegetation or the top of bank, whichever is greater. |
| Policy 6-51 | Permitted Uses within Riparian Corridor Buffer Zones. Permit only the following uses in riparian corridor buffer zones:
<ul style="list-style-type: none">a. Uses permitted in riparian corridors pursuant to Policy 6-47;b. Public scenic overlooks; |

- c. Existing agriculture, providing no existing riparian vegetation is removed and no soil is allowed to enter stream channels;
- d. Infrastructure improvements that protect public safety and property and that also restore the hydrological function of the watercourse;
- e. Temporary disruption (e.g. less than six months) for the construction, alteration, repair and maintenance of existing or newly permitted facilities or structures if there are no feasible alternatives and the disruption is repaired and restored to at least an equivalent condition; and
- f. Native landscaping.

Implementation of projects on the Opportunity Areas listed under the 2023-2031 Housing Element would not interfere with wildlife corridors or wildlife nursery sites. The City permits certain uses within Riparian Corridor Buffer Zones that could serve as potential habitat for migratory fish or wildlife species. However, housing sites are located outside of defined Critical Habitat areas and compliance with LUP policies would be required which will insure appropriate buffers and development standards for construction and ongoing operation of future development. Additionally, development in streams, wetlands, and other areas where riparian vegetation and wildlife movement corridors occur would require regulatory permits before construction is allowed, such as a Streambed Alteration Agreement with CDFW, which would require replacing riparian vegetation removed during project construction and other measures. Moreover, development in such areas is not required for implementation of the Housing Element. Therefore, project impacts would be less than significant with implementation of policies in the 2020 LUP and mandatory compliance with state regulation and permit conditions.

LESS THAN SIGNIFICANT IMPACT

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

Implementation of the 2023-2031 Housing Element would be subject to all applicable local policies and regulations related to the protection of important biological resources. Construction activities facilitated by the Housing Element Update could result in direct or indirect impacts to mature trees. The LUP acknowledges that the plan area contains mature trees that are non-native, or invasive and are devoid of habitat quality. LUP Policy 6-67 encourages the replacement of these species with native species where possible with minimal risk to ESHAs. Native trees such as coast willows and alders, and other mature trees exist throughout the planning area. Any construction or removal of trees are subject to policies within the LUP. The following 2020 LUP policies would mitigate impacts to biological resources, including trees:

Policy 6-67 Invasive Species Removal. Encourage private landowners and public agencies to remove invasive species, including eucalyptus trees, from their lands and replace Half Moon Bay - Local Coastal LUP Chapter 6: Natural Resources 6-54 them with native, non-invasive species. Allow such work to occur with an expedited review process where there is de minimis risk to ESHA and public safety.

- Policy 6-69** **Mitigation.** Require mitigation in the form of habitat creation or substantial restoration for permitted impacts to ESHA and other sensitive resources that cannot be avoided through the implementation of siting and design alternatives. Priority shall be given to on-site mitigation. Off-site mitigation shall only be approved when it is not feasible to fully mitigate impacts on-site. In such case, off-site mitigation within city limits is preferred; followed by mitigation within the coastal zone of unincorporated San Mateo County and finally by other coastal zone areas. Mitigation shall not substitute for implementation of the project alternative that would avoid impacts to ESHA.
- Policy 6-70** **Mitigation Ratios.** Assess allowable resource impacts to determine required mitigation ratios on a case-by-case basis. At a minimum, apply the following mitigation ratios: a. 10:1 for native tree replacement; b. 4:1 for wetlands; c. 3:1 for riparian habitats; d. 3:1 for other habitats that support state or federal rare, threatened, or endangered species, species of special concern (designated by the CDFW), or CNPS 1b or 2 listed plants; e. 2:1 for Central Dune Scrub not occupied by listed species; f. 1:1 for heritage tree replacement (e.g. Monterey cypress, Monterey pine); and g. 1:1 for temporary impacts to any of the above habitat types.

In addition to the policies described above, the HMBMC Chapter 18.37 contains Visual Resource Protection Standards. The purpose of the Visual Resource Protection Standards is to protect scenic and visual qualities and ensure that there is minimal alteration of natural landforms including trees, and restoration and enhancement in visual quality. It accomplishes this by preserving tree stands wherever possible and requires that reforestation with indigenous or naturalized species as part of the development process if trees must be removed. It also identifies significant plant communities including riparian vegetation, notable tree stands, and that they shall be preserved wherever possible. The 2023-2031 Housing Element does not include any components that would preclude implementation of or alter the above-described policies, or ordinance. Thus, implementation of the Housing Element Update would not conflict with any local policies or ordinances protecting biological resources, including protected trees. Impacts related to local policies or ordinances protecting biological resources would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- 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?*

Habitat Conservation Plans designated under FESA Section 10(a)(1)(B), are federal planning documents designed to conserve the ecosystems upon which listed species depend, ultimately contributing to their recovery. HCPs require a “take permit” when a project will affect a species identified as listed, non-listed or eligible under the act and detail how those impacts will be minimized or mitigated; and how the HCP is to be funded. According to the 2020 Local Coastal LUP, no HCPs apply to Half Moon Bay (Half Moon Bay 2020a). Therefore, no impact would occur from implementation of development under the 2023-2031 Housing Element and General Plan update.

NO IMPACT

5 Cultural Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would implementation of the 2023-2031 Housing Element:				
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 formal cemeteries?	☐	☐	☒	☐

Setting

This section provides an analysis of the project's impacts on cultural resources, including historical and archaeological resources, as well as human remains. CEQA requires a lead agency to determine whether a project may have a significant effect on historical resources (PRC, Section 21084.1). A historical resource is a resource listed in, or determined to be eligible for listing in, the California Register of Historical Resources (CRHR); a resource included in a local register of historical resources; or any object, building, structure, site, area, place, record, or manuscript a lead agency determines to be historically significant (State CEQA Guidelines, Section 15064.5[a][1-3]).

In addition, if it can be demonstrated that a project would cause damage to a unique archaeological resource, the lead agency may require reasonable efforts to be made to permit any or all of these resources to be preserved in place or left in an undisturbed state. To the extent that resources cannot be left undisturbed, mitigation measures are required (PRC, Section 21083.2[a], [b]).

PRC, Section 21083.2(g) defines a unique archaeological resource as an archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it:

1. Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information;
2. Has a special and particular quality such as being the oldest of its type or the best available example of its type; or
3. Is directly associated with a scientifically recognized important prehistoric or historic event or person.

According to the California Office of Historic Preservation's Built Environment Resources Directory (BERD), the city of Half Moon Bay contains 153 previously recorded historic resources, including multiple buildings concentrated within the downtown area of Half Moon Bay (OHP 2023). Identified

historic structures and sites that are eligible for BERD listing may be vulnerable to adjacent construction associated with infill development if they are damaged by construction or if their context changes substantially.

Impact Analysis

- a. *Would the project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?*

The proposed project envisions residential development in proximity to historic properties. Most of the City's older structures, some of which have or qualify for historic designation, are concentrated in the Old Downtown portion of the Town Center. Residential development on the housing sites in proximity to these historic properties could change their context, which would be an adverse impact on historic resources.

It is also possible that individual housing sites may contain historic-era resources, which could be destroyed or otherwise adversely impacted from residential development on the site. However, residential development envisioned in the 2023-2031 Housing Element must undergo evaluation for significance before project construction could begin, in accordance with Public Resources Code Section 21084.1. This could include a preliminary evaluation by an architectural historian, qualified under the Secretary of the Interior's standards, or an Historic Resources Assessment conducted by someone similarly qualified, depending on the potential degree of impact. The requirement would be determined during the permitting process, pursuant to the City's Historic Resources Preservation Ordinance (HMBMC Chapter 14.39), which requires approval by the City Planning Department for actions that affect designated historical resources. If through this evaluation, historic resources are determined present and potentially affected by the proposed residential development project, the following LCP policies would reduce potential impacts:

- | | |
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| Policy 8-1 | Cultural Resources Protection. Half Moon Bay's cultural resources shall be protected and preserved through identification, education and awareness, and development standards for avoidance and mitigation of impacts. |
| Policy 8-2 | Development Impacts on Cultural Resources. New development shall avoid impacts to cultural resources through siting and design measures to the extent feasible. Any unavoidable impacts, disturbance, or substantial adverse changes caused by development on cultural resources shall be mitigated through measures such as preservation in place or site sampling and salvage. The preferred and required alternatives for mitigating impacts, if feasible, are avoidance or preservation in place. Consult with Native American representatives on appropriate alternatives. |
| Policy 8-3 | Cultural Resources Reporting. Require all known and newly discovered cultural resources to be reported to the appropriate tribe or tribal community, agency, or organization. These may include but are not limited to the California Native American Heritage Commission, the State Historical Resources Commission, or the California Office of Historic Preservation. |

Adherence to the HMBMC and the LUP goals and policies would reduce potential impacts to historic resources to less than significant.

LESS THAN SIGNIFICANT IMPACT

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

Most of the housing sites are situated in developed urban areas that have been previously disturbed and graded for existing development. However, housing sites in the western parts of the city limits include undeveloped properties, and impacts to previously unknown cultural resources in these areas would be possible during residential construction. Effects on archaeological resources can only be known once a specific project has been proposed because potential effects are highly dependent on the individual project site conditions and the characteristics of proposed ground-disturbing activity.

For ground-disturbing activities associated with development facilitated by the 2023-2031 Housing Element, particularly on housing sites that have not previously been developed with urban uses or that have not been studied through a prior cultural resources investigation, or for projects where excavation depths exceed those previously attained at that site, there would be potential for residential construction activities to damage or destroy previously unknown archaeological resources that may be present on or below the ground surface. Consequently, damage to or destruction of previously unknown sub-surface cultural resources could occur from construction of the residential development envisioned in the proposed Housing Element on some sites.

The LCP includes the following policies, which would reduce or avoid potential impacts to archaeological resources:

- | | |
|-------------------|---|
| Policy 8-7 | Archaeological Resources Archive. Establish a comprehensive archive of archaeological surveys, maps, and other relevant studies, inventories, and information for sites throughout the city to support archaeological resource protection. |
| Policy 8-8 | Archaeological Resources Mapping. Maintain Figure 8-1 <i>Archaeological Sensitivity Areas</i> as an updated generalized archaeological resource map for public use that designates archaeologically sensitive areas and identifies where archaeological reports may be required for future development. Develop and maintain a detailed archaeological resources map, which, due to the sensitive and fragile nature of archaeological resources, is intended for use by City staff and authorized persons only. |
| Policy 8-9 | Archaeological Survey with Development Applications. Require the submission of a report by a qualified archaeologist as part of applications for new development based on the location and scope of the project, including within any archaeologically sensitive area as designated on the archaeological resources map. In areas vulnerable to sea level rise impacts, require a site-specific evaluation of potential sea level rise impacts to any archaeological resources on the development site. A report may include the results of an archaeological records review and/or survey observations with findings on actual and potential resources on the site, impacts of the development proposed, and any recommended mitigation measures. All feasible mitigation measures shall be incorporated in any plan for development prior to the issuance of a permit for development. |

- Policy 8-10 Archaeological and Paleontological Resources Monitoring.** Require the submission of a report by a qualified archaeologist as part of applications for new development based on the location and scope of the project, including within any archaeologically sensitive area as designated on the archaeological resources map. In areas vulnerable to sea level rise impacts, require a site-specific evaluation of potential sea level rise impacts to any archaeological resources on the development site. A report may include the results of an archaeological records review and/or survey observations with findings on actual and potential resources on the site, impacts of the development proposed, and any recommended mitigation measures. All feasible mitigation measures shall be incorporated in any plan for development prior to the issuance of a permit for development.
- Policy 8-11 Discovery of Archaeological and Paleontological Resources.** Regardless of site location, require all development to halt work if subsurface archaeological or paleontological resources are discovered during construction. The developer shall notify the City and retain a qualified professional archaeologist to identify any necessary handling and notification procedures and mitigation measures. Work shall not resume until these measures have been reviewed and approved by the City and all appropriate entities have been notified. Consult with the appropriate Native American tribe(s) on if and how to rebury any discovered tribal resources.
- Policy 8-12 Discovery of Human Remains.** When human remains are uncovered during development, no further disturbance of the site shall occur until the County Coroner has made the necessary findings as to origin and disposition of the remains. If the Coroner determines that the remains are Native American, the California Native American Heritage Commission shall be notified and no further disturbance of the site shall occur until the Commission provides direction on handling procedures.

These LCP policies would reduce impacts to archaeological resources. For example, Policy 8-11 would require construction to stop in the event that archaeological resources are uncovered or discovered during construction, and work near the resource would not resume until an archaeologist has evaluated the discovery and provided additional guidance or restrictions for construction. With implementation of these policies, potential impacts of the Housing Element on archaeological resources would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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

Similar to archaeological resources discussed above, there would be potential for previously undiscovered human remains to be discovered during residential construction envisioned in the Housing Element. Even in previously disturbed housing sites, it is possible that unanticipated human remains could be encountered during construction.

If human remains are discovered, the State Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the Coroner has made the necessary findings as to origin and disposition pursuant to Public Resources Code Section 5097.98. If there is a possibility that the remains are of Native American origin, the following LCP policy would be applicable:

Policy 8-12 Discovery of Human Remains. When human remains are uncovered during development, no further disturbance of the site shall occur until the County Coroner has made the necessary findings as to origin and disposition of the remains. If the Coroner determines that the remains are Native American, the California Native American Heritage Commission shall be notified and no further disturbance of the site shall occur until the Commission provides direction on handling procedures.

Mandatory compliance with regulations and laws, as well as implementation of the LCP policies listed in this section would reduce impacts to less than significant.

LESS THAN SIGNIFICANT IMPACT

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6 Energy

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would implementation of the 2023-2031 Housing Element:				
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?	☐	☐	☒	☐

Setting

California is one of the lowest per capita energy users in the United States, ranked 48th among states, due to its energy efficiency programs and mild climate. In 2023, California consumed 648 million barrels of petroleum, 2,085 billion cubic feet of natural gas, and 1.2 million short tons of coal in 2020 (United States Energy Information Administration [EIA] 2025). The single largest end-use sector for energy consumption in California is transportation (10.8 percent) followed by commercial (7.1 percent) residential (6.4 percent), and industrial (4.7percent) (EIA 2025).

Most of California’s electricity is generated in state with approximately 30 percent imported from the Northwest and Southwest in 2020; however, the state relies on out-of-state natural gas imports for nearly 90 percent of its supply (California Energy Commission [CEC] 2022 and EIA 2025). In addition, approximately 33 percent of California’s electricity supply comes from renewable energy sources, such as wind, solar photovoltaic, geothermal, and biomass (CEC 2022). In 2018, Senate Bill 100 accelerated the state’s Renewable Portfolio Standards Program, codified in the Public Utilities Act, by requiring electricity providers to increase procurement from eligible renewable energy and zero-carbon resources to 33 percent of total retail sales by 2020, 60 percent by 2030, and 100 percent by 2045.

To reduce statewide vehicle emissions, California requires all motorists use California Reformulated Gasoline, which is sourced almost exclusively from in-state refineries. Gasoline is the most used transportation fuel in California with 13.4 billion gallons sold in 2024 and is used by light-duty cars, pickup trucks, sport utility vehicles, and aviation. Diesel is the second most used fuel in California with 2.9 billion gallons sold in 2024 and is used primarily by heavy duty-trucks, delivery vehicles, buses, trains, ships, boats and barges, farm equipment, and heavy-duty construction and military vehicles (California Department of Tax and Fee Administration 2022).

Energy consumption is directly related to environmental quality in that the consumption of nonrenewable energy resources releases criteria air pollutant and greenhouse gas (GHG) emissions into the atmosphere. The environmental impacts of air pollutant and GHG emissions associated with

the project's energy consumption are discussed in detail in Section 3, *Air Quality*, and Section 8, *Greenhouse Gas Emissions*, respectively.

Impact Analysis

- 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?*

Reasonably foreseeable development under the 2023-2031 Housing Element would consume energy during construction and operation using petroleum fuel, natural gas, and electricity, as further addressed below.

Construction

Energy use during construction associated with reasonably foreseeable development under the 2023-2031 Housing Element would be in the form of fuel consumption (e.g., gasoline and diesel fuel) to operate heavy equipment, light-duty vehicles, machinery, and generators for lighting. In addition, temporary grid power may also be provided to construction trailers or electric construction equipment. Energy use during the construction of individual projects would be temporary in nature, and equipment used would be typical of construction projects in the region. In addition, construction contractors would be required to demonstrate compliance with applicable CARB regulations that restrict the idling of heavy-duty diesel motor vehicles and govern the accelerated retrofitting, repowering, or replacement of heavy-duty diesel on- and off-road equipment. Residential construction activities would be required to utilize fuel-efficient equipment consistent with State and Federal regulations and would comply with State measures to reduce the inefficient, wasteful, or unnecessary consumption of energy.

These practices and requirements would result in efficient use of energy during construction of residential development envisioned in the 2023-2031 Housing Element. Furthermore, in the interest of both environmental awareness and cost efficiency, construction contractors would not utilize fuel in a manner that is wasteful or unnecessary. Therefore, residential construction would not result in wasteful, inefficient, or unnecessary consumption of energy, and construction impacts would be less than significant.

Operation

Long-term operation of residential development envisioned in the 2023-2031 Housing Element would require permanent grid connections for electricity to power internal and exterior building lighting, and heating and cooling systems. New development would be subject to the energy conservation requirements of the California Energy Code (Title 24, Part 6 of the California Code of Regulations, California's Energy Efficiency Standards for Residential and Nonresidential Buildings), the California Green Building Standards Code (CALGreen, Title 24, Part 11 of the California Code of Regulations). The California Energy Code provides energy conservation standards for all new and renovated commercial and residential buildings constructed in California. This Code applies to the building envelope, space-conditioning systems, and water-heating and lighting systems of buildings and appliances and provides guidance on construction techniques to maximize energy conservation. This Code emphasizes saving energy at peak periods and seasons and improving the quality of installation of energy efficiency measures. The California Green Building Standards Code sets targets for energy efficiency; water consumption; dual plumbing systems for potable and recyclable water;

diversion of construction waste from landfills; and use of environmentally sensitive materials in construction and design, including ecofriendly flooring, carpeting, paint, coatings, thermal insulation, and acoustical wall and ceiling panels.

As a result of mandatory compliance with these ordinances and regulations, operational impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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

Currently, the City does not have a local plan for renewable energy or energy efficiency; however, the City published Phase 1 of their Climate Change and Adaption Plan in December 2023 (City of Half Moon Bay 2023). Residential development envisioned in the 2023-2031 Housing Element would be required to comply with City and State energy efficiency regulations and standards, including CALGreen building code requirements, and compliance with these requirements would be assessed during the project permitting and review process. This would ensure that individual residential projects implemented under the 2023-2031 Housing Element would not conflict with renewable energy and energy efficiency plans and standards adopted by the City. Therefore, reasonably foreseeable development under the 2023-2031 Housing Element would not conflict with or obstruct a plan for renewable energy or energy efficiency, and would not result in development that would conflict with a plan to renewable energy and energy efficiency. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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7 Geology and Soils

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would implementation of the 2023-2031 Housing Element:				
a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
1. 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?	☐	☐	☒	☐
2. Strong seismic ground shaking?	☐	☐	☒	☐
3. Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
4. 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 wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	☐	☒
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☒	☐

Setting

The city of Half Moon Bay is located in a geographic area of high seismic risk due to its proximity (within approximately 5 miles) to the San Andreas fault. During an earthquake on this fault in the San Francisco Bay Area, Half Moon Bay may reasonably be expected to experience moderate to severe ground shaking. In addition, the San Gregorio Fault is located offshore approximately 0.5 miles from the city, and smaller faults including Denniston Creek and Seal Cove that are part of this system are mapped as Alquist-Priolo Special Studies Zones and are considered active; these are located nearly 3.5 miles north of the City of Half Moon Bay (CDOC 2016).

Liquefaction is a phenomenon in which loose, saturated, granular soils behave similarly to a fluid when subjected to high-intensity ground shaking. As illustrated in Figure 7-3 of the LUP, nearly half of Half Moon Bay has a moderate potential of liquification, mostly in the northern portion of the city. The remaining approximately half of the city has a low liquification potential (Half Moon Bay 2020a).

Landslides generally occur in loosely consolidated, wet soil and/or rocks on steep sloping terrain. Landslide potential is generally considered low for much of the city, except in those portions of the planning area adjacent to hillsides, coastal bluffs, and shorelines, specifically located in the northern most portion along the hillsides of unincorporated San Mateo County and near the coastal areas south of Redondo Beach, as seen in Figure 7-3 *Seismic Hazards and Liquefaction Potential* in the 2020 LUP (Half Moon Bay 2020a).

No paleontological resources of known significance have been identified in Half Moon Bay, and they are extremely limited throughout the San Mateo County coastal zone (Half Moon Bay 2020a).

Impact Analysis

- a.1. *Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving 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?*
- a.2. *Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking?*

Because none of the faults described above in *Setting* are within the city itself, the likelihood of surface rupture of a known fault is low. However, earthquakes on these faults could cause ground shaking at the housing sites.

Implementation of the following LCP policies would reduce risks and impacts associated with fault zones and strong seismic shaking:

- | | |
|--------------------|--|
| Policy 7-44 | Minimize Geologic Hazard Consequences. New development in areas of high geologic and seismic hazard shall minimize risk to life and property and neither create nor contribute to geologic and seismic hazards. Geologic and seismic hazards are defined to include soil stability, erosion, sedimentation, landslides, subsidence, seismicity, and liquefaction. |
| Policy 7-45 | Seismic and Geologic Hazard Mapping. Maintain and update maps of geologic and seismic hazard areas in response to significant updates in best available science and information. |

- Policy 7-46 Geologic Reports.** Require submittal of a site-specific geologic hazards report prepared by a qualified professional for new development proposed in areas of high geologic hazard risk, including as indicated on the Seismic Hazards and Liquefaction Potential map (Figure 7-3). The report shall describe the threats and impacts from geologic hazards arising from, for example, seismic events, watercourse erosion, landslides, expansive soils, and subsidence areas. Reports shall identify appropriate hazard setbacks, siting and design options, and mitigation measures where necessary to minimize potential impacts to life and property.
- Policy 7-47 Hillside Construction Slope Limitation.** Require submittal of a soils and slope stability report prepared by a qualified professional for all new development on slopes 20 percent or greater. Development of new structures on hillside slopes 30 percent or greater shall be prohibited, with the exception of critical facilities and public infrastructure that cannot be located elsewhere.
- Policy 7-48 New Critical, High-Occupancy, and Public Facilities in Geologic Hazard Areas.** Prohibit the siting of new critical facilities, structures involving high occupancies, and public facilities in areas of high geologic hazard unless such location is deemed essential to the public welfare. Where permitted, these structures will be sited, designed, and constructed to minimize and mitigate potential for damage due to ground deformation, seismically triggered subsidence, landslides, or other geologic hazards. Public access and recreation facilities, such as trails, may be located in such areas when geologic hazards are appropriately avoided or mitigated to the extent feasible.
- Policy 7-49 Landslide Remediation and Stabilization.** Permit the remediation or stabilization of landslides that affect existing structures or that threaten public health or safety except along coastal bluff or other eroding edges, such as streambanks. Permit remediation or stabilization to the extent necessary where an existing landslide prevents development of private property and remediation does not shift risk to other property, and the remediation project includes mitigation monitoring and reporting. Alternative remediation or stabilization techniques shall be analyzed to determine the least environmentally damaging alternative. Maximum feasible mitigation shall be incorporated into the project in order to minimize adverse impacts to resources.
- Policy 7-50 Geologic Event Analysis.** Require a detailed study to be conducted in the event that a substantial landslide or seismic event may have caused significant damage to a foundation or structure to document the geologic materials, foundations, or structures involved.

In addition, development would be subject to the provisions in the Chapter 14.36 of the HMBMC, which include California Building Code requirements to reduce seismic impacts and other engineering standards for buildings such as masonry building standards, as these are historically known to be vulnerable to seismic activity. Adherence to these goals, policies, and regulations would reduce potential impacts to less than significant levels.

LESS THAN SIGNIFICANT IMPACT

a.3. Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction?

Housing sites fall within both high and low liquefaction zones, depending on the specific site's location in Half Moon Bay. Accordingly, future residences could be at risk of the effects of liquefaction if they are located on sites with a high liquefaction potential.

New construction within liquefaction zones would be required to be built to current building, structural, and seismic codes. In accordance with the State's Seismic Hazard Mapping Act, development within liquefaction zones must perform site-specific geotechnical investigations prior to construction. The SHMA requires the State Geologist to establish regulatory zones (Zones of Required Investigation) and to issue appropriate maps (Seismic Hazard Zone maps). These maps are distributed to local agencies to use in planning and controlling construction and development (CDOC 2016). Soil improvement requirements to mitigate liquefaction hazards on small lots could be economically infeasible but this would be determined when specific projects are proposed on individual sites. Compliance with City and State building codes, such as HMBMC Chapter 14-04 Building Code, as well as the policies within the 2020 LUP, listed above in the preceding impact would reduce liquefaction risks using current engineering and construction practices. The proposed project would not exacerbate liquefaction potential in the area. As such, the 2023-2031 Housing Element would not directly or indirectly cause substantial adverse effects from liquefaction risk, and impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

a.4. Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides?

Several Housing sites are located within or directly adjacent to areas susceptible to landslides, including those along Pilarcitos Creek and along the north and south portions of Highway 92 in the city's eastern boundary (CDOC 2023).

Residential development would be subject to the 2020 LUP policies listed in the impact analysis above and the provisions in Chapter 14.04 of the HMBMC, which adopts the California Building Code's requirements to reduce seismic impacts, including landslides. In addition to the 2020 LUP policies listed above, development in landslide hazard areas would be required to adhere to Chapter 17.40, Design Standards, of the HMBMC, which sets forth standards for development for drainage and slope. Adherence to existing policies and regulations would reduce impacts to less than significant.

LESS THAN SIGNIFICANT IMPACT

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

Residential development envisioned in the proposed Housing Element would require construction involving grading and excavation. Grading would remove ground cover, such as grass, shrubs and trees, which typically hold soils in place and reduce erosion. Construction would also loosen the newly exposed soils, increasing the potential for erosion.

Demolition and construction activities would be required to comply with HMBMC Section 14.04.020 which adopts the California Building Code and ensures appropriate erosion and storm water pollution control during grading and construction activities. Construction activities that occur on more than one acre are required to obtain a National Pollutant Discharge Elimination System

(NPDES) Construction General Permit. NPDES requires the development of a stormwater pollution prevention plan, which includes best management practices (BMPs) to reduce erosion and topsoil loss from stormwater runoff. Additionally, development would adhere to water quality protection Construction Phase Best practices, including monitoring the site for erosion and sediment runoff; and Erosion Control, Drainage, and Storm Water Management Plans in Chapter 18.38 Coastal Resource Conservation Standards in the HMBMC, as applicable.

Adherence to applicable regulations and permits would ensure that residential development would not significantly increase the potential for soil erosion or loss of topsoil. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- 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?*
- 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?*

Some of the housing sites identified in the proposed Housing Element Update would be located in geologic units or soil types that are susceptible to landslides, lateral spreading, subsidence, liquefaction, or collapse. Additionally, some housing sites would be located in areas with soils that are potentially susceptible to expansion, such as those along Pilarcitos Creek. Landslides, lateral spreading, subsidence, liquefaction, or collapse, as well as soil expansion, would have the potential to damage or destroy residential development envisioned in the Housing Element Update. Additionally, if housing sites are improperly graded, the graded slopes could collapse or slide, resulting in erosion and impacts to water quality. Several Housing sites are located in areas susceptible to expansive soils including those along Pilarcitos Creek and along Highway 92 on the city's eastern boundary.

Residential development envisioned in the 2023-2031 Housing Element would require geotechnical evaluation and the latest construction standards would be required for all new infill and other development, which are designed to reduce exposure to and effects of unstable soils, as required by Section 17.44.010 of the HMBMC. Implementation of these standards along with strategies and policies of the 2020 LUP listed in impact analysis *a.1* and *a.2*, above, would reduce adverse effects from unstable soils and expansive soils.

In addition, development would be required to adhere to the standards for structural design and site development in the California Building Code. The California Building Code contains standards for excavation, grading, and earthwork construction; fills and embankments; expansive soils; foundation investigations; and liquefaction potential and soils strength loss. Adherence to these requirements would achieve accepted safety standards for unstable geologic units or soils. Therefore, impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- 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?*

As discussed in the City's 2020 LUP, Half Moon Bay is entirely served by established wastewater conveyance and treatment services. As such, new development would connect to existing sewer lines or sewer lines that may be expanded in the future. Residential development envisioned in the Housing Element Update would not require the use of septic tanks or alternative wastewater systems. Therefore, the Housing Element Update would have no impact related to soils incapable of adequately supporting septic tanks or alternative wastewater disposal systems.

NO IMPACT

- f. *Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?*

While no paleontological resources of known significance have been identified in Half Moon Bay, construction activities associated with residential development envisioned in the 2023-2031 Housing Element could impact previously unknown or undiscovered paleontological resources, directly or indirectly damaging or destroying the resource.

The 2020 LUP includes policies providing for the management and protection of significant paleontological resources as follows:

Policy 8-10 Archaeological and Paleontological Resources Monitoring. Require, where a predevelopment survey identifies the potential to affect known or newly discovered archaeological, Native American, or paleontological resources, the submittal of a monitoring and reporting plan that identifies methods and describes the procedures for selecting archeological and Native American monitors and procedures that will be followed if additional or unexpected resources are encountered during development of the site. Procedures may include, but are not limited to, provisions for cessation of all grading and construction activities in the area of the discovery that has any potential to uncover or otherwise disturb cultural deposits in the area of the discovery and all construction that may foreclose mitigation options to allow for significance testing, additional investigation and mitigation.

Policy 8-11 Discovery of Archaeological and Paleontological Resources. Regardless of site location, require all development to halt work if subsurface archaeological or paleontological resources are discovered during construction. The developer shall notify the City and retain a qualified professional to identify any necessary handling and notification procedures and mitigation measures. Work shall not resume until these measures have been reviewed and approved by the City and all appropriate entities have been notified. Consult with the appropriate Native American tribe(s) on if and how to rebury any discovered tribal resources.

These LUP policies would reduce potential impacts because they require identification and mitigation of impacts on unique paleontological resources or sites. Accordingly, this impact would be less than significant.

LESS THAN SIGNIFICANT IMPACT

8 Greenhouse Gas Emissions

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would implementation of the 2023-2031 Housing Element:				
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?	☐	☐	☒	☐

Setting

Gases that absorb and re-emit infrared radiation in the atmosphere are called greenhouse gases (GHG). The gases that are widely seen as the principal contributors to human-induced climate change include carbon dioxide (CO₂), methane (CH₄), nitrous oxides (N₂O), fluorinated gases such as hydrofluorocarbons and perfluorocarbons, and sulfur hexafluoride. Water vapor is excluded from the list of GHGs because it is short-lived in the atmosphere and its atmospheric concentrations are largely determined by natural processes, such as oceanic evaporation. GHGs are emitted by both natural processes and human activities. Of these gases, CO₂ and CH₄ are emitted in the greatest quantities from human activities. Emissions of CO₂ are largely by-products of fossil fuel combustion, and CH₄ results from off-gassing associated with agricultural practices and landfills. Different types of GHGs have varying global warming potentials (GWP), which are the potential of a gas or aerosol to trap heat in the atmosphere over a specified timescale (generally 100 years). Because GHGs absorb different amounts of heat, a common reference gas (CO₂) is used to relate the amount of heat absorbed to the amount of the GHG emissions, referred to as carbon dioxide equivalent (CO₂e), and is the amount of a GHG emitted multiplied by its GWP. CO₂ has a 100-year GWP of one. By contrast, CH₄ has a GWP of 28, meaning its global warming effect is 28 times greater than that of CO₂ on a molecule per molecule basis (Intergovernmental Panel on Climate Change [IPCC] 2014a).

The accumulation of GHGs in the atmosphere regulates Earth's temperature. Without the natural heat-trapping effect of GHGs, the Earth's surface would be about 33 degrees Celsius (°C) cooler. However, emissions from human activities, particularly the consumption of fossil fuels for electricity production and transportation, have elevated the concentration of GHGs in the atmosphere beyond the level of naturally occurring concentrations.

Regulatory Framework

In response to climate change, California implemented Assembly Bill (AB) 32, the "California Global Warming Solutions Act of 2006." AB 32 required the reduction of statewide GHG emissions to 1990 emissions levels (essentially a 15 percent reduction below 2005 emission levels) by 2020 and the

adoption of rules and regulations to achieve the maximum technologically feasible and cost-effective GHG emissions reductions. On September 8, 2016, the Governor signed Senate Bill 32 into law, extending AB 32 by requiring the State to further reduce GHG emissions to 40 percent below 1990 levels by 2030 (the other provisions of AB 32 remain unchanged). AB 1279, “The California Climate Crisis Act,” was passed on September 16, 2022, and declares the State would achieve net zero GHG emissions as soon as possible, but no later than 2045, and to achieve and maintain net negative GHG emissions thereafter. In addition, the bill states that the State would reduce GHG emissions by 85 percent below 1990 levels no later than 2045. In response to the passage of AB 1279 and the identification of the 2045 GHG reduction target, CARB published the Final 2022 Climate Change Scoping Plan in November 2022 (CARB 2022). The 2022 Update builds upon the framework established by the 2008 Climate Change Scoping Plan and previous updates while identifying new, technologically feasible, cost-effective, and equity-focused path to achieve California’s climate target.

Impact Analysis

- a. *Would the project generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?*
- b. *Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?*

According to the Bay Area Air Quality Management District (BAAD), long-range plans, such as General Plans and General Plan Elements, would have a less-than-significant impact related to GHG emissions if the plan demonstrates that it would achieve the State’s 2030 GHG reduction target, consistent with the California Global Warming Solutions Act of 2016 Senate Bill 32, and the 2045 carbon neutrality goal, consistent with Executive Order B-55-18 (BAAD 2022). More specifically, a communitywide long-range plan would have a less-than-significant impact related to GHG emissions if the plan demonstrates consistency with the GHG reduction strategy criteria in the State CEQA Guidelines Section 15183.5(b) (BAAD 2022). One strategy listed in State CEQA Guidelines Section 15183.5(b) is to prepare and adopt a climate action plan.

The City of Half Moon Bay published its Climate Action Plan (CAP) Phase 1 in December 2023 and is currently developing Climate Adaptation Plan Phase 2. Together, these will form the Climate Action and Adaptation Plan (CAAP), a comprehensive roadmap for advancing new programs, services, and policies aimed at reducing greenhouse gas (GHG) emissions (City of Half Moon Bay, 2023). Through the CAAP, Half Moon Bay is aligning with California’s statewide climate goals by committing to reduce GHG emissions 40% below 1990 levels by 2030 and to achieve carbon neutrality by 2045 or earlier, with at least an 85% reduction from 1990 levels in accordance with Assembly Bill (AB) 1279. These goals also support the State’s broader target of reducing emissions 49% below 2005 levels by 2030. The City uses projected population and employment data to model its future emissions trajectory and to determine the scale of reductions needed to meet both local and state targets. Once fully implemented, the CAAP will provide a citywide accounting of GHG emissions and define actionable strategies to ensure Half Moon Bay does its part to meet California’s climate commitments. As described in more detail in Section 14, *Population and Housing*, the estimated population growth that could be induced from buildout of the 2023-2031 Housing Element (2,465) barely exceeds regional projections (approximately 23 more people than projected) and is fully accounted for in the LUP. Accordingly, the CAAP will account for and reduce the GHG emissions of the residential development envisioned in the Housing Element Update.

Before the CAAP is adopted and implemented, residential development could commence. Residential construction would generate GHG emissions, such as CO₂ in the diesel exhaust of construction equipment. When construction emissions are amortized over the lifetime of a typical project, they represent a small portion of a project's contribution to GHG emissions. Following construction, the vehicle trips made by residents and guests of the housing projects would generate GHG emissions. As described in Section 17, *Transportation*, buildout of the residential development in the Housing Element Update would reduce the vehicle miles traveled (VMT) per capita in Half Moon Bay and the surrounding coastal communities, like Montara. This reduction in VMT per capita would result in a decrease in per capita GHG emissions. Occupancy of the housing projects would also generate GHG emissions. Most of the occupancy GHG emissions would result from fossil fuels burned for heat and the use of gases for refrigeration and cooling in buildings. Development envisioned in Housing Element Update would be required to include solar PV systems in accordance with the 2022 Building Energy Efficiency Standards and energy efficient design and construction pursuant to CALGreen standards. For the reasons stated in this paragraph, the project would not conflict with State plans to reduce GHG emissions, and GHG emissions impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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9 Hazards and Hazardous Materials

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would implementation of the 2023-2031 Housing Element:				
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 0.25 mile of an existing or proposed school?	☐	☐	☒	☐
d. Be located on a site that is included on a list of hazardous material 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 in 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?	☐	☐	☒	☐

Setting

Properties in Half Moon Bay with current or prior land uses that involve(d) use of hazardous materials or sites that have known soil or groundwater contamination include large and small-quantity generators of hazardous waste, such as gas stations and sites with historical agricultural pesticide use. There are 35 leaking underground storage tanks (LUST) sites that have received case closure and are no longer actively regulated and there is one open case which is eligible for closure (SWRCB 2025). There are five California Department of Toxic Substances Control (DTSC) listed cleanup sites in and around the City, all of which are closed (DTSC 2022). According to DTSC, there are no Superfund or other State Responsibility sites in the Plan Area.

Impact Analysis

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

The Housing Element pertains to residential development. Residential uses typically do not involve the routine transport, use, or disposal of hazardous materials. Section 7.20.080 of the HMBMC prohibits the handling, use, generation, or storage of hazardous materials in residences that exceed basic home use. Accordingly, residential uses could involve the use of minor amounts of hazardous materials typical of household purposes, such as paint or lawncare products, including gasoline to power lawnmowers. Some future residents would also likely own automobiles that routinely or regularly use hazardous materials, such as gasoline and motor oil.

The 1991 Half Moon Bay General Plan Safety Element Hazardous Materials policies that govern the transport of hazardous materials are as follows:

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|-----------------|--|
| Policy 1 | Do not encourage industries which rely extensively on use of hazardous materials. |
| Policy 2 | Ensure that development proposals facilities are consistent with Hazardous Waste Management Plan involving hazardous the San Mateo Waste County. |
| Policy 3 | Continue implementation and enforcement of State chemical disclosure laws and regulations. |
| Policy 4 | Provide information and assistance to residents, businesses. and industry that request information regarding the proper use, storage. transportation. handling. and disposal of hazardous substances. |
| Policy 5 | Conduct and/or support the operation of household hazardous waste collection programs to be conducted to benefit the City. The City should also provide educational programs regarding the proper use and disposal of hazardous substances. |
| Policy 6 | Encourage the Fire District to continue annual inspections of hazardous material users and hazardous waste generators of comply with State and local regulations. |
| Policy 7 | Consider adopting an amendment to the City's Zoning Ordinance that would prohibit assembly-type uses (i.e., theaters, day care centers, churches, etc.) from being located in multi-tenant buildings that are located in industrial zones and are designed to accommodate hazardous substance users. |

- Policy 8** Continue to coordinate with the San Mateo County Environmental Health Department regarding the City responsibilities and appropriate actions to be taken in the event of a hazardous material release incident.
- Policy 9** Coordinate with other agencies that have emergency response responsibilities in the event of a hazardous release (i.e., California Highway Patrol and County Sheriff and Fire Departments).
- Policy 10** Conduct periodic reviews and updates of the City's hazardous materials incident response plan. This review should be conducted in conjunction with a simultaneous review of the hazardous materials users list compiled and maintained by the Fire District in compliance with chemical disclosure laws.
- Policy 11** That the Half Moon Bay Police Department and the Half Moon Bay Fire Protection District shall conduct an annual test of the City's Hazardous Incident Response Plan to ensure its on-going efficacy.
- Policy 12** Require an applicant for new development on property containing abandoned gas well sites, as a condition of approval, to relocate the abandoned well, or otherwise mitigate any potential adverse impacts from the existence of the abandoned well site on the property proposed for development.
- Policy 13** Any development project or structure proposed to be located over or in the proximity of an abandoned oil and gas well site must be approved by the State Division of Oil and Gas. Reabandonment may be required. If construction over an abandoned oil and gas well is unavoidable, any gas venting system over the well recommended by the State Division of Oil and Gas must be installed and approved to the satisfaction of the State Division of Oil and Gas.

Use of hazardous materials would be subject to compliance with existing regulations, standards, and guidelines established by the federal, State, and local agencies related to storage, use, and disposal of hazardous materials, and new development would be subject to the policies of the 1991 General Plan, listed above. In addition, because the quantities stored or used at a particular residence would be minor, there would be no significant hazard to the public or the environment if the materials were released. Therefore, compliance with all applicable local, State, and federal laws and regulations relating to environmental protection and the management of hazardous materials, would ensure that potential impacts associated with the routine transport, use, or disposal of hazardous materials would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- 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?*

The Housing Element envisions residential construction that could also require demolition of existing structures. During construction there would be potential for the accidental release of hazardous construction fluids and materials, such as diesel fuel or hydraulic fluid used to power construction machinery. Likewise, demolition of older structures could release asbestos containing materials or lead-based paint into the environment. Demolition of buildings constructed prior to the adoption of regulations governing lead-based paint (1978) and asbestos-containing materials (1989) would be subject to regulations governing their removal, in accordance with California Code of

Regulations Title 8, Section 1532.1 (lead) and Section 1529 (asbestos-containing materials). Furthermore, adherence to the 1991 General Plan policies stated above would minimize potential impacts associated with the upset of hazardous materials. As described further in CEQA checklist question 'd', below, existing regulations would prevent the accidental release of hazardous materials during grading and excavation activities on housing sites.

State and federal regulations under the Clean Water Act require implementation of a Stormwater Pollution Prevention Plan (SWPPP) for construction activities disturbing land areas of 1 acre or more. In addition, the SWPPP includes measures for cleaning up spills of construction fluids, such as diesel or hydraulic fluid. Residential development envisioned in the 2023-2031 Housing Element would not create a significant hazard to the public or the environment with implementation of the SWPPP and with adherence to: City Municipal Code Sections 13.15.200 and 18.08.030, state, and federal regulations applicable to the use and transport of hazardous materials, such as CFR Title 49 §383.5 and CCR Division 2.5 Title 22, as well as the 1991 General Plan policies described above. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- c. *Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school?*

Residential uses could involve use and transport of small quantities of hazardous materials in the form of fertilizer or household cleaning products and would therefore not emit or handle hazardous materials in such a way that it would impact those outside the home or property. However, because some of the housing sites are located within 0.25 mile of existing schools, demolition or construction activities related to the development of residential structures could result in hazardous emissions or the handling of hazardous materials within 0.25 mile of an existing or proposed school. For example, demolition of older buildings could release lead-based paint or asbestos containing materials. Demolition of buildings constructed prior to the adoption of regulations governing lead-based paint (1978) and asbestos-containing materials (1989) would be subject to regulations governing their removal, in accordance with California Code of Regulations Title 8, Section 1532.1 (lead) and Section 1529 (asbestos-containing materials). Chapter 14.50 of the HMBMC includes requirements for construction and demolition waste recycling, and HMBMC Section 7.20.080 prohibits the handling, use, generation, or storage of hazardous materials in residences that exceed basic home use. Additionally, construction vehicles would be required to comply with CSRB regulations including the Off-Road Diesel Fueled Fleets Regulation which limits idling to 5 minutes to reduce diesel emissions which could be harmful to sensitive receptors such as schools. Other regulatory requirements, such as implementation of the SWPPP, would prevent discharge of hazardous construction fluids, such as diesel fuel from the project site.

With adherence to local, state, and federal regulations, and HMBMC ordinances (see checklist item 'b.' above) applicable to the use and transport of hazardous materials and siting of sensitive uses, the residential development envisioned in the 2023-2031 Housing Element would not emit hazardous emissions or handle hazardous or acutely hazardous substances or waste within 0.25 mile of an existing or proposed school. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- d. *Would the project be located on a site that is included on a list of hazardous material 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?*

No housing sites are located on existing hazardous materials sites or LUST site locations discussed above in *Settings* (SWRCB 2022). The five DTSC listed cleanup sites in and around the City are closed, and there are no Superfund or other State Responsibility sites in the Plan Area.

It is also possible that underground storage tanks (UST)s, which were in use prior to permitting and records being kept, could be present in the city. If an unidentified UST is uncovered or disturbed during construction, it would be removed pursuant to a permit from the City or San Mateo County Health Services as its designation as the Certified Unified Program Agency (CUPA). If such removal would potentially undermine the structural stability of existing structures or foundations, or impact existing utilities, the tank might be closed in place without removal. Tank removal activities could pose both health and safety risks, such as the exposure of workers, tank handling personnel, and the public to tank contents or vapors. Potential risks, if any, posed by USTs would be minimized by managing the tank according to existing standards contained in California Health and Safety Code Division 20, Chapters 6.7 and 6.75 (UST Program), as enforced and monitored by the Environmental Programs Division.

The extent to which soil or groundwater may be affected by an UST or other potential contamination source such as historical agricultural pesticide use depends on the type of contaminant, the amount released, the duration of the release, distance from source, and depth to groundwater. If groundwater contamination is identified, characterization of the vertical and lateral extent of the contamination and remediation activities would be required by the RWQCB prior to the commencement of any new construction activities that would disturb the subsurface. If contamination exceeds regulatory action levels, future developers would be required to undertake remediation procedures prior to grading and development, under the supervision of the RWQCB, depending on the nature of any identified contamination. Compliance with existing State and local regulations would reduce impacts to less than significant levels.

LESS THAN SIGNIFICANT IMPACT

- 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?*

The nearest airport is the Half Moon Bay Airport, a small airport located approximately one mile north of Half Moon Bay city limits. The nearest housing site is located over two miles south of the airport. Furthermore, the city is outside of the airport influence area (CCAG 2014). Therefore, the 2023-2031 Housing Element would not result in a safety hazard or excessive noise for people residing on housing sites. There would be no impact.

NO IMPACT

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

Implementation of the 2023-2031 Housing Element Update could impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. For example, construction activities associated with residential development could impact evacuation protocols in such plans depending on the duration and intensity of construction. The Safety Element

Update of the 1991 General Plan directs the City to accommodate safety needs when planning and approving land uses and development in Half Moon Bay. This would include continued interjurisdictional coordination in response to emergencies. The General Plan Update Fire Hazards policies that would ensure adequate emergency response, including evacuation, are as follows:

- Policy 9** Land uses in rural or fire hazard areas shall only be permitted if clustered near major roads, have adequate access for fire protection vehicles and have demonstrated that adequate water system and fire plans are available.
- Policy 12** Support efforts to identify all roads, streets, and major public buildings so that they are clearly visible to fire protection and other emergency vehicles.

In addition to the above 1991 General Plan policies, the LUP includes the following policies related to evacuation routes, which would reduce the potential for the Housing Element to interfere with emergency response and evacuation:

- Policy 3-41 Emergency Access and Evacuation.** Ensure adequate emergency vehicle access to all parts of the city, including during times of peak congestion and in popular destinations, such as the beaches, downtown, and California Coastal Trail segments between pedestrian bridges. Widen shoulders and implement other strategies to improve roadways for emergency vehicle access and evacuation traffic.
- Policy 7-27 Shoreline Hazard Avoidance for New Critical Facilities.** Avoid locating new or expanded critical facilities in areas susceptible to shoreline hazards. If no feasible alternative exists and a new or expanded critical facility must be located in a shoreline hazard area, require the new development to incorporate siting and design measures based on worst-case sea level rise projections and extreme weather event scenarios to promote continued functionality and public services, resist structural damage, facilitate evacuation on short notice, and minimize risk to life, property, and coastal resources.
- Policy 7-68 Fire Hazard Avoidance for New Subdivisions.** Ensure that new subdivisions are established with adequate emergency vehicle access, evacuation standards for residential development, and can be maintained without requiring fuel modification within ESHAs and their buffer areas. Prohibit the creation of new developable lots within high fire hazard zones.

Furthermore, the County of San Mateo Multi-Hazard Mitigation Plan provides guidance for managing emergency situations associated with natural and man-made disasters. As part of the permitting process, road closures and other aspects of construction would be coordinated with the Half Moon Bay Fire Department, which would ensure development projects conform with the 1991 General Plan and the aforementioned LUP policies, emergency plans, and other resources related to evacuation and emergency response. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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

This question is addressed under threshold question e in Section 20, Wildfire.

10 Hydrology and Water Quality

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would implementation of the 2023-2031 Housing Element:				
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?	☐	☐	☒	☐

Setting

The project area is entirely within the Half Moon Bay Terrace Groundwater Basin which extends north into Montara (Half Moon Bay 2020a). Percolation of direct precipitation, inflow of minor streams, minor subsurface inflow from surrounding semi-permeable formations, and irrigation return provide recharge to the basin. As of 2020, the Department of Water Resources determined that the Half Moon Bay Terrace Groundwater Basin is healthy and a “very low” priority basin (Half Moon Bay 2020a).

Half Moon Bay is under the jurisdiction of the San Francisco Bay Regional Water Quality Control Board (RWQCB), which is responsible for the preparation and implementation of the water quality control plan for the region. To comply with the Municipal Regional Stormwater Permit (MRP), reissued by the Regional Water Quality Control Board in 2015, local agencies in San Mateo County, including Half Moon Bay, require development projects to incorporate appropriate stormwater controls. These include requirements for owners or developers to implement stormwater pollution control requirements for construction activities. Provisions of the federal and State Clean Water Act require compliance with the National Pollutant Discharge Elimination System (NPDES) storm water permit No. CA0029921 for projects disturbing more than one acre during construction. For sites less than one acre in size, the City requires a stormwater pollution control plan. Operators of a residential construction site would be responsible for preparing and implementing a stormwater pollution prevention plan that outlines project specific best management practices (BMPs) to control erosion, sediment release, and otherwise reduce the potential for discharge of pollutants in stormwater. Post-construction BMPs are also required by the NPDES permit. Typical BMPs include covering stockpiled soils, installation of silt fences and erosion control blankets, and proper handling and disposal of wastes.

Phase I of the NPDES program, promulgated by the USEPA in November 1990, requires NPDES permits for stormwater discharges from municipal separate storm sewer systems (MS4s) serving populations of 100,000 or greater, construction sites disturbing greater than five acres of land, and 10 categories of industrial activities. Half Moon Bay is covered under the NPDES MS4 Permit No. CAS612008, issued in 2022.

The USEPA recognized that smaller construction projects (disturbing less than five acres) and small MS4s (serving populations smaller than 100,000) were also contributing substantially to pollutant discharges nationwide. Therefore, in order to further improve stormwater quality, the USEPA promulgated the NPDES Phase II program in January 2000, which requires NPDES permits for stormwater discharges from regulated small MS4s and for construction sites disturbing between one and five acres of land.

HMBMC Chapter 13.15 establishes requirements for stormwater discharge management and pollution control including prohibiting the discharge of non-storm water discharges to the city storm sewer system; requiring adherence to construction best management practices such as the use of filters at catch basins; and giving the City the authority to sample, test, and monitor stormwater.

California also regulates modifications and alterations to streams, rivers, and lakes through Section 1602 of the California Fish and Game Code. Section 1602 requires any person, state or local governmental agency, or public utility to notify CDFW prior to beginning any activity that may do one or more of the following:

- Divert or obstruct the natural flow of any river, stream, or lake;
- Change the bed, channel, or bank of any river, stream, or lake;

- Use material from any river, stream, or lake; or
- Deposit or dispose of material into any river, stream, or lake.

Impact Analysis

- a. *Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?*
- e. *Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?*

Construction of the residential development envisioned in the 2023-2031 Housing Element could impact surface or ground water quality due to erosion resulting from exposed soils during grading and the generation of water pollutants, including construction fluids. Operation of residences could increase the types or concentration of pollutants in stormwater runoff. For example, runoff from paved driveways could transport fluids or substances from vehicles, such as minor oil leaks or tire dust on asphalt surfaces.

Compliance with the federal, state, and regional regulatory requirements discussed above in *Setting* would minimize impacts to water quality during the construction of future projects under the 2023-2031 Housing Element Update. For example, compliance with the NPDES permit would require implementation of a SWPPP at most of the housing sites. The SWPPP would identify BMPs that must be installed during construction to prevent siltation of surface waters and discharge of construction pollutants to surface waters. Another example of existing regulatory requirements that would minimize impacts of housing operations to water quality is compliance with the City's MS4 permit. Compliance with the MS4 permit would require new housing developments to incorporate on-site stormwater treatment measures to prevent pollutants from leaving the housing sites and entering the City's storm drain system.

Furthermore, the 2020 LUP provides policies that guide water pollution prevention, as follows:

- | | |
|--------------------|--|
| Policy 6-75 | Protect and Conserve Water Resources. Protect, conserve, and, where feasible, restore the quality of the City's watersheds and water resources, including fresh water, marine habitats, and groundwater. |
| Policy 6-76 | Green Infrastructure. Promote and prioritize the use of Low Impact Development (LID) strategies, Best Management Practices (BMPs), and on-site infiltration to create green infrastructure for treating and reducing stormwater runoff. In and adjacent to ESHA, use resource-dependent green infrastructure projects for natural restoration purposes and provision of buffer areas to allow for natural erosion, evolution of natural drainage flows, and sediment transport balance. |
| Policy 6-79 | Stormwater Management. Reduce impacts from erosion and water quality degradation by managing development project runoff stormwater discharge rates and implementing hydromodification management measures. Update storm event standards and precipitation models with best available science on climate change as necessary. |

- Policy 6-81 Siting and Design.** Site and design development to avoid adverse impacts to coastal waters by incorporating measures designed to achieve the following:
- a. Protect, restore, and enhance areas that provide important water quality benefits, areas necessary to maintain riparian and aquatic biota and/or that are susceptible to erosion and sediment loss;
 - b. Limit increases of impervious surfaces, especially impervious surfaces directly connected to the storm drain system;
 - c. Minimize the transport of pollutants from development into runoff and coastal waters;
 - d. Limit land disturbance activities such as clearing and grading, and cut-and-fill to reduce erosion and sediment loss; and
 - e. Preserve, restore, and enhance natural watercourses and vegetation.
- Policy 6-82 Land Division Design.** All land divisions shall be designed such that the location of and grading required for building pads and access roads minimizes erosion and sedimentation. Ensure that new subdivisions are sized and designed to provide adequate space for necessary runoff and drainage controls. Prohibit land divisions that would result in building pads, access roads, or driveways located on slopes over 30 percent, or result in grading on slopes over 30 percent.
- Policy 6-83 Construction Best Management Practices (BMPs).** Require new development proposals to include construction phase erosion control and polluted runoff control plans. These plans shall specify BMPs that will be implemented to minimize erosion and sedimentation, provide adequate sanitary and waste disposal facilities and prevent contamination of runoff by construction chemicals and materials.
- Policy 6-84 Drainage and Runoff Control Plans.** Require new development proposals to include post-construction phase drainage and polluted runoff control plans. Such plans shall:
- a. Specify site design, source control and treatment control BMPs that will be implemented to minimize post-construction polluted runoff, and shall include the monitoring and maintenance plans for these BMPs;
 - b. Ensure that post-construction structural BMPs (or suites of BMPs) are designed to treat, infiltrate, or filter the amount of stormwater runoff produced by all storms up to and including the 10-year 2-hour storm event;
 - c. Ensure dry weather runoff does not exceed the pre-development baseline flow rate to receiving waterbodies;
 - d. Complement and utilize existing drainage patterns and systems where they are in proper functioning condition, conveying drainage from the developed area of the site in a non-erosive manner that avoids downstream cumulative impacts; and
 - e. Restore disturbed or degraded natural drainage systems where feasible, except where there are geologic or public safety concerns.

- Policy 6-85** **Developments of Particular Water Quality Concern.** In association with any coastal development permit application, any development with a relatively greater potential for adverse impacts to water quality (e.g. NPDES C.3 Regulated Projects) shall:
- a. Conduct a site characterization and document the expected effectiveness of the proposed BMPs;
 - b. Provide drainage and runoff control plans pursuant to Policy 6-84;
 - c. Use a green infrastructure approach to retain the design storm runoff on-site; and
 - d. Use Treatment Control and Runoff Control BMPs to remove pollutants of concern and minimize adverse post-development changes in the runoff flow regime if any portion of the runoff produced by the design storm cannot be retained on-site.
- Policy 6-86** **BMP Maintenance.** Require structural BMPs to be inspected, cleaned, and repaired as necessary to ensure proper functioning for the life of the development. As a condition of permit approval, require ongoing application, maintenance and monitoring as is necessary for effective operation of all BMPs (including site design, source control, and treatment control).
- Policy 6-87** **Erosion from Infrastructure.** Ensure that new infrastructure such as roads, bridges, and culverts shall not cause or contribute to watercourse or hillside erosion, or watercourse or wetland siltation and shall include BMPs to minimize impacts to water quality, including construction phase erosion and pollution runoff control plans, and soil stabilization practices. Where space is available, dispersal of sheet flow from roads into vegetated areas or other on-site infiltration practices shall be incorporated into road and bridge design.
- Policy 6-88** **Grading and Site Plan.** Require all development to be sited and designed so as to minimize grading, alteration of natural landforms, and vegetation clearance in order to prevent soil erosion, stream siltation, reduced water percolation, increased runoff, and adverse impacts on plant and animal life and prevent net increases in baseline flows for any receiving waterbody, except where necessary for habitat restoration projects.
- Policy 6-89** **Grading Permit.** Require grading or earthmoving exceeding 50 cubic yards (total including cut and fill) and/or on any portion of a site with a slope greater than 20 percent to apply for a grading permit as a condition of approval for a coastal development permit, with the exception of tilling or other earthmoving customarily related to existing agricultural operations. The City shall have discretion to require a grading permit based on site-specific conditions and unusual circumstances for grading or earthmoving of less than 50 cubic yards. Grading plans shall meet the requirements of the local implementation plan with respect to maximum quantities, maximum cuts and fills, remedial grading, grading for safety purposes, and maximum heights of cut or fill. Any grading proposed in or adjacent to an ESHA shall be minimized and any disruption shall be repaired and restored to at least an equivalent condition.

- Policy 6-90 Seasonal Grading.** Prohibit earthmoving during the rainy season (extending generally from October 15 to April 15) for development that is located within or adjacent to ESHA or that includes grading on slopes greater than 25 percent. In such cases, approved grading shall not be undertaken unless there is sufficient time to complete grading operations before the rainy season. If grading operations are not completed before the rainy season begins, grading shall be halted and temporary erosion control measures shall be put into place to minimize erosion and sedimentation until grading resumes after April 15, unless the City determines that completion of grading would be more protective of resources. Grading during the rainy season may be permitted to remediate hazardous geologic conditions that endanger public health and safety.
- Policy 6-91 Erosion Control Measures.** Ensure that where grading is permitted during the rainy season (extending generally from October 15 to April 15), erosion control measures shall be implemented prior to and concurrent with grading operations. Such measures shall be maintained through final grading and until landscaping and permanent drainage is installed and established.
- Policy 6-92 Landscaping and Revegetation.** Require cut and fill slopes and other areas disturbed by construction activities (including areas disturbed by fuel modification or brush clearance) to be landscaped or revegetated according to site-specific conditions at the completion of grading. Landscape plans shall provide that:
- a. Plantings shall be native, drought-tolerant plant species, and blend with the existing natural vegetation and natural habitats on the site, except as noted below.
 - b. Invasive plant species that tend to supplant native species and natural habitats shall be prohibited.
 - c. Non-invasive ornamental plants and lawn may be permitted in combination with native, drought-tolerant species within the irrigated zone(s) required for fuel modification nearest approved residential structures.
 - d. Any landscaping or revegetation shall be monitored and reported for a period of at least five years following the completion of planting. Performance criteria shall be designed to measure the success of the plantings, including a desired percent coverage of native species within a specified timeframe. Mid-course corrections shall be implemented if necessary. If performance standards are not met by the end of the designated monitoring period, the monitoring period shall be extended until the standards are met.
- Policy 6-94 New Stormwater Outfalls.** Prioritize the use of green infrastructure instead of new stormwater outfalls when feasible. Otherwise ensure that new stormwater outfalls are sited and designed to minimize impacts from sea level rise and to coastal resources. Consolidate new and existing outfalls where appropriate.

- Policy 6-97 Litter, Debris, and Contaminants.** Ensure that public areas, including streets and recreational areas, are routinely cleaned of litter, debris, and contaminant residue. Coordinate with and support efforts by other organizations or volunteer groups to promote clean-ups of beaches and public open spaces. Require the City, property owners, or homeowners associations, as applicable, to sweep parking lots and public and private streets frequently to remove debris and contaminated residue in coordination with garbage collection schedules.
- Policy 6-98 Wastewater Discharges.** Ensure that any wastewater discharges minimize impacts to the biological productivity and quality of coastal streams, wetlands, and the ocean.

The 2023-2031 Housing Element would therefore not conflict with or obstruct implementation of a water quality control plan. Furthermore, future projects implemented under the 2023-2031 Housing Element would be required to comply with the existing regulations discussed under *Impacts a.* and *b.* of this section, including during construction and operation, and would not otherwise substantially degrade water quality. Impacts would be less than significant.

A sustainable groundwater management plan has not been adopted for the groundwater basin underlying Half Moon Bay (California Department of Water Resources 2025). Therefore, the 2023-2031 Housing Element would not conflict with or obstruct a sustainable groundwater management plan. Please see checklist question 'b.' below for a discussion of potential impacts on groundwater supplies and recharge.

With mandatory adherence to regulations and permits, and implementation of the listed LUP policies, impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- 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?*

Water needed during construction of residential development for cleaning, dust control, and other uses would be nominal and not require new wells or groundwater pumping. Pile driving, dewatering, and other construction activities reaching greater depths below ground surface than typical utility trenching and foundation excavation could encounter groundwater.

Intensification of development and addition of impervious surfaces as a result of implementation of the 2023-2031 Housing Element would not interfere with groundwater recharge. Recharge to the Basin is derived from percolation of rainfall and from irrigation runoff. Large amounts of open space that help recharge the Half Moon Bay Terrace Groundwater Basin would remain undeveloped with build-out of the 2023-2031 Housing Element. New wells are not envisioned in the Housing Element because the entire planning area is within the urban boundary and has access to municipal water. Thus, implementation of the 2023-2031 Housing Element would not result in substantial increases in impermeable surfaces overlying the Basin or depletion of groundwater.

The LUP includes policies to protect the Half Moon Bay Terrace Groundwater Basin. Limiting new wells is one consideration. With few exceptions, only priority uses, especially agriculture and agriculture compatible uses, environmental restoration, and public recreation will be granted coastal development permits for new private or public wells. In addition to LUP policies shown

above, the following policies would help to reduce potential impacts on groundwater recharge associated with future development.

- Policy 6-80 Groundwater Extraction.** Regulate development to limit or prevent extraction and avoid overdraft from aquifers that are potentially vulnerable to seawater intrusion, including as consistent with the private and public well policies of Chapter 3. Public Works. Encourage measures to recharge shallow aquifers that are depleted.
- Policy 6-100 Natural Hydrology.** Preserve, or where feasible, restore natural hydrologic conditions such that downstream erosion, natural sedimentation rates, surface flow, and groundwater recharge function near natural equilibrium states.
- Policy 6-101 Alteration of Natural Watercourses.** Prohibit alterations or disturbance of natural watercourses, or human-made or altered drainage courses that have replaced natural watercourses and serve the same function, with the following exceptions:
- a. Necessary water supply projects;
 - b. Flood, sedimentation, or erosion control projects to protect public safety and existing structures where there is no other feasible alternative; or
 - c. The Improvement of fish and wildlife habitat.

Any alterations permitted for one of these three purposes shall: adhere to the performance standards listed for permitted uses within riparian corridors in Policy 6-47; minimize adverse impacts to coastal resources, including the depletion of groundwater and changes in water flow speed and volume; and include maximum feasible mitigation measures to mitigate unavoidable impacts. Green infrastructure shall be preferred for flood protection, erosion, and sedimentation control over “hard” solutions such as concrete or riprap channels. Any permitted watercourse alterations shall include BMPs for hydromodification activities.

While the insertion of support and foundation structures for new residential structures in groundwater-bearing soils may reduce the groundwater storage capacity of these soils, the displaced volume would not be substantial relative to the volume of the Basin. Likewise, while construction dewatering would remove groundwater, the volume of water removed would not likely be substantial relative to groundwater pumping for water supply. Thus, construction activities would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge. Implementation of the 2023-2031 Housing Element would not interfere substantially with percolation flow because the areas targeted for new development represent a small percentage of the total land area of Half Moon Bay and would be largely infill projects in already developed areas containing at least some impervious surface area. Therefore, the 2023-2031 Housing Element would not substantially affect groundwater recharge, and the impact would be considered less than significant.

LESS THAN SIGNIFICANT IMPACT

- c.(i) *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 result in substantial erosion or siltation on- or off-site?*
- c.(ii) *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 substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?*

Construction activities as part of infill/redevelopment associated with implementation of the 2023-2031 Housing Element would largely occur in already developed areas, but could involve stockpiling, grading, excavation, dredging, paving, and other earth-disturbing activities resulting in minor alteration of existing drainage patterns near streams or other drainage areas. The 2020 LUP includes policies designed to minimize stormwater and erosional impacts during construction, as follows:

- Policy 6-102 Hydromodification Impacts.** Evaluate potential hydromodification impacts of development proposals including but not limited to grading, dredging, fill, channelization, and dams permitted pursuant to Policy 6-101 in the context of watershed planning, considering potential benefits and/or adverse impacts to the watershed as a whole. Potential adverse impacts of such projects include effects on habitat, downstream erosion and sedimentation, dam maintenance (to remove silt and trash), and interruption of sand supplies to beaches.
- Policy 6-103 Erosion Protection for Watercourses.** Protect watercourses from erosion impacts. Examples include but are not limited to maintaining riparian vegetation where present to slow water flow; avoiding hardening banks and channels which exacerbates erosion up or downstream; restoring the floodplain and establishing a meander belt; and providing green infrastructure drainage facilities to reduce run-off into the City's various watercourses.
- Policy 6-104 Watercourse Monitoring.** Monitor and assess the condition of watercourses with respect to changes in erosion and sedimentation. In cases where undesirable changes are identified (e.g. the beginning of incising or head cutting conditions, bank retreat, or subsidence), implement restoration measures prior to such conditions becoming irreparable through low impact green infrastructure intervention measures.

Implementation of these policies would reduce the potential impact associated with altered drainage patterns and hydrology. Additionally, as described in Threshold a above, compliance with the SWRCB's NPDES General Construction Activity Stormwater Permit and NPDES MS4 regulations would reduce the risk of short-term erosion resulting from drainage alterations during construction to less than significant levels.

Development under the 2023-2031 Housing Element would result in alterations to drainage, such as localized, minor changes in ground surface permeability via paving and minor, limited changes in topography by grading and excavation. The *Setting* section above discusses applicable regulations that would limit pollutant discharges from development carried out under the 2023-2031 Housing Element. NPDES permit requirements would be imposed on applicable projects to limit pollutant discharges. Development implemented under the 2023-2031 Housing Element would be subject to the provisions of the City's NPDES MS4 Permit. These include provisions requiring implementation

of appropriate BMPs, including a range of methods to minimize off-site erosion, including, but not limited to, hydrodynamic devices, swales/biofilters, basins, and various filters.

The 2020 LUP policies listed above are designed to minimize post-construction erosion impacts and require implementation of BMPs, incorporation of stormwater detention facilities, design of drainage facilities to minimize adverse effects on water quality, and minimization of increase in impervious areas. Implementation of these policies would reduce the volume of sediment-laden runoff discharging from sites identified in the 2023-2031 Housing Element. Therefore, compliance with the NPDES regulations discussed above, the CDFW regulations discussed in Thresholds c.iii and c.iv below, and implementation of the LUP policies listed above would reduce the risk of erosion resulting from drainage alterations during the operation of new developments to less than significant.

LESS THAN SIGNIFICANT IMPACT

- c.(iii) 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 that would 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?*
- c.(iv) 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 impede or redirect flood flows?*

Most 2023-2031 Housing Element sites are infill development in the urbanized Town Center area. Some sites would be redeveloped and others would be new development of vacant land or land in other uses such as agriculture. Development of land currently covered with permeable surfaces, such as bare soil or vegetation, is anticipated to occur. Thus, natural drainage patterns, particularly in hillside areas, could be altered. Increased impervious surfaces could result in an increase of stormwater runoff in the city. This increased runoff could exceed the capacity of existing and planned infrastructure and contribute to downstream flooding impacts.

The 2020 LUP policies identified in Thresholds c.i and c.ii above are designed to minimize stormwater runoff and would also apply to runoff-related flooding impacts. These policies include implementation of BMPs, incorporation of stormwater detention facilities, design of drainage facilities to minimize adverse effects on water quality, and minimization of increases in impervious areas. Implementation of these policies would also reduce the volume of runoff generated and potential for flooding. If development on housing sites identified in the HEU proposes changes to streams, this would occur in compliance with CDFW Streambed Alteration regulations in order to maintain drainage patterns. Therefore, implementation of LUP policies and compliance with HMBMC 13.15 and NPDES regulations, and compliance with drainage guidelines and CDFW Streambed Alteration regulations (CDFG Code Section 1602) would reduce the risk of flooding resulting from drainage alterations to a less than significant level. As discussed in *Hazards and Hazardous Materials*, the operation of development facilitated by the 2023-2031 Housing Element could degrade runoff water quality by contributing chemicals associated with household, commercial, transportation, and landscape uses. However, activities during operation of future development would not provide additional sources of polluted runoff apart from those described in Threshold a above. This impact would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- d. *In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation?*

According to the Federal Emergency Management Agency's (FEMA's) Flood Insurance Rate Map (FIRM) for San Mateo County, none of the housing site are mapped within the 100-year flood hazard zone (FEMA 2012). Tsunami risk within the city is mapped along the entirety of the Half Moon Bay shoreline, typically ranging inland only as far as the large bluffs at the edge of the beaches. Most of the housing sites are not within the tsunami inundation zone. However, a small portion of Opportunity Site 2 (498 Kelly Avenue) is partially within a tsunami hazard area (CGS 2021). Residential development on that site would be subject to LUP Policy 7-8, Shoreline Hazards and New Development:

Policy 7-8 Shoreline Hazards and New Development. Ensure that new development, including land division, is sized, sited and designed to be safe from shoreline hazards such as coastal flooding, shoreline erosion, tsunami inundation, seawater intrusion, and other sea level rise impacts without requiring a shoreline protection device at any time over the anticipated life span of the structure.

Development of the housing site partially within a tsunami inundation zone would be designed to avoid or otherwise protect any development within the delineated inundation zone, consistent with LUP Policy 7-8. Because the project would not include development within mapped flood zones or subject to tsunami inundation, the 2023-2031 Housing Element would not create a significant risk of releasing pollutants due to project inundation, and this impact would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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11 Land Use and Planning

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would implementation of the 2023-2031 Housing Element:				
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?	☐	☐	☒	☐

Impact Analysis

a. Would the project physically divide an established community?

The 2023-2031 Housing Element would facilitate the development of new housing and would not involve installation of roadways or other linear structures or facilities that could physically divide an established community. Several of the proposed housing sites located east of Highway 1 would likely necessitate internal streets to allow for circulation, but these would be part of the development and would not divide existing communities. Consequently, 2023-2031 Housing Element would have no impact associated with the physical division of an established community.

NO IMPACT

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?

Upon its adoption by the City, the 2023-2031 Housing Element would serve as a comprehensive statement of the City's housing policies and as a specific guide for program actions to be taken in support of those policies. The 2023-2031 Housing Element is a policy document that largely encourages housing opportunities in infill areas throughout the city. The LUP includes goals, policies, and programs to avoid or mitigate environmental impacts, as discussed throughout this Initial Study. Moreover, the LUP update included the amount of housing proposed in the 2023-2031 HEU. Therefore, the proposed HEU is consistent with the LUP. Implementation of the 2023-2031 Housing Element would not, therefore, conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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12 Mineral Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would implementation of the 2023-2031 Housing Element:				
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?	☐	☐	☐	☒

Setting

The Surface Mining and Reclamation Act of 1975 designated mineral resource areas in four Mineral Resource Zones (MRZ) throughout the State. MRZ-1 are areas where adequate information indicates that no significant mineral deposits are present, or it is judged that little likelihood exists for their presence; MRZ-2 are areas where geologic data or information indicate that significant resources are present; MRZ-3 are areas containing mineral occurrences of undetermined mineral resource significance; MRZ-4 are areas where available information is inadequate for assignment to any other MRZ.

The project area in Half Moon Bay is designated MRZ-3, whose significance cannot be evaluated from available data. There are areas designated MRZ-4 outside of the project area in unincorporated Half Moon Bay, and a small portion of MRZ-2 designated area near Nuff Creek, north of State Route 92 (CDOC 1987).

Impact Analysis

- 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?*
- 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?*

Pursuant to the Surface Mining and Reclamation Act of 1975, the State Geologist, and the State Mining and Geology Board, the city of Half Moon Bay and project area do not contain mineral deposits of regional significance nor deposits for which significance requires further evaluation (CDOC 2018). Therefore, no impacts to known or locally important mineral resources would occur as a result of the proposed 2023-2031 Housing Element.

NO IMPACT

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13 Noise

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project result in:				
a. 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. Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
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?	☐	☐	☐	☒

Setting

According to the City's General Plan, the predominant noise source in Half Moon Bay originates from motor vehicles. Some major arterial roadways pass through the city. State Highways 1 and 92 are by far the most substantial noise sources in Half Moon Bay. The City's General Plan shows noise levels of 60 dBA CNEL at distances of over 100 feet from the centerlines of these two roadways. Other roadways in the City do not have the traffic volumes sufficient to generate substantial noise.

Some locations in Half Moon Bay also have noise sources specific to those locations. For example, ocean-front locations in Half Moon Bay could have waves crashing and outdoor recreation that contribute to ambient noise levels. Likewise, aircraft may contribute to ambient noise levels in and around the Half Moon Bay airport.

Impact Analysis

- 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?*

Residential development envisioned in the proposed 2023-2031 Housing Element Update would generate temporary increases in noise during construction. For example, residential construction could involve the use of heavy machinery, such as backhoes and dump trucks that would generate noise. Other construction activities, such as house framing, would involve repetitive noises, such as

hammering. These types of construction noises could impact nearby receptors, such as neighboring residences. Section 14.40.010 of the HMBMC requires residential construction work to occur only during the following hours: 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. Section 9.23.020(B) of the HMBMC states that the operation of any pile driver, steam shovel, pneumatic hammer, derrick, hoist, or other appliance that generates a loud or unusual noise between the hours of 8:00 PM and 7:00 AM is prohibited. Mandatory compliance would prevent construction noise from interfering with receptors during the most sensitive hours, such as night time when most people prefer quiet or low noise levels suitable for sleeping.

Residential uses are not substantial generators of noise during operation because noise from the residences themselves are generally self-contained, and residents are subject to the City's Noise Curfew pursuant to HMBMC 9.23.010 which prohibits offensive noises, as defined, before 8:00 a.m. or after 10:00 p.m.

Furthermore, residential land uses do not involve manufacturing, processing, or generation of large amounts of traffic which could produce substantial, temporary, or periodic increases in ambient noise. Residential noises are more commonly sounds of people talking, TVs and music, and lawn care equipment. Because most of the housing sites are near existing residential uses, these noises already characterize the noise types and levels in the existing environment.

The City's 1991 General Plan Safety and Noise Element contains the following policies related to noise in Half Moon Bay, which would reduce noise impacts, as well:

Objective 1.0: Incorporate noise considerations into land use planning decisions.

- | | |
|-------------------|--|
| Policy 1.b | The City shall require a noise impact evaluation by a qualified acoustical engineer (i.e., a Registered Professional Engineer in the State of California with a minimum of three years experience in acoustics) for all new residential subdivisions and for all new commercial developments on any site within 300 feet of any residential district or Planned Unit Development District where residential uses are proposed. Noise from an intervening highway shall be considered as a part of the noise evaluation. Should mitigation be necessary, specific proposals shall be addressed by the Architectural Review Committee, Planning Commission, or both. |
| Policy 1.c | The City shall not approve projects that do not comply with the adopted standards. |

Objective 2.0: Establish measures to reduce noise impacts from traffic noise sources.

- | | |
|-------------------|---|
| Policy 2.a | The City shall require, for new development projects that are impacted by noise or cannot meet the standards specified in the Noise Element, the construction of barriers to mitigate sound emissions where necessary or where feasible. Action Items 1, 4, 5 and 6 provide specific measures for meeting this objective. |
|-------------------|---|

Objective 3.0: Establish measures to control non-transportation noise impacts.

- | | |
|-------------------|---|
| Policy 3.a | The City shall establish a new Community Noise Ordinance to mitigate noise conflicts from non-transportation noise sources. The City of Half Moon Bay does not currently have a problem with non-transportation sources of noise (e.g., industrial noise sources). Therefore, it does not seem prudent to adopt a Noise |
|-------------------|---|

Ordinance aimed at the sources. However, in-fill construction is occurring throughout the City, and this can impact existing residential areas. Therefore, it is proposed to limit construction activities that occur within 500 feet of existing residences to Monday through Friday from 7 A.M. to 7 P.M. only. Construction also should not be allowed on federal holidays.

Because construction would occur during the day and would be temporary, and operation would not introduce new types of noise, and because the listed General Plan policies would be implemented, the impacts to the environment from a temporary or periodic increase in ambient noise levels would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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

Long-term operation of future housing development permitted under the 2023-2031 Housing Element would not result in any groundborne vibration or excessive groundborne noise, although construction activities may result in temporary groundborne vibration and groundborne noise levels. Residential construction could generate temporary vibration, such as when soil compactors are used during site preparation or if vibratory rollers are used for new internal circulation roads at housing sites. However, the Housing Element envisions typical residential construction, which does not generate excessive amounts of vibration. Accordingly, impacts would be less than significant.

LESS THAN SIGNIFICANT 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?*

As stated in Section 9, *Hazards and Hazardous Materials*, there are no airports within two miles of the proposed housing sites. Therefore, the Housing Element would not expose people residing or working in those areas to excessive noise levels from airports or air traffic. There would be no impact.

NO IMPACT

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14 Population and Housing

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would implementation of the 2023-2031 Housing Element:				
a. Induce substantial unplanned population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure)?	☐	☐	☒	☐
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☒	☐

Setting

The California Department of Finance (DOF) estimates that the population of Half Moon Bay was approximately 11,303 residents in 2025 (DOF 2025). ABAG estimates that the population of Half Moon Bay would increase to 13,385 by 2035 (ABAG 2018). According to the DOF E-5 Population Estimates, the average persons per household in Half Moon Bay was 2.44 in 2025(DOF 2025).

Impact Analysis

- 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)?*

This Initial Study evaluates development of up to 782 dwelling units, consistent with the City’s August 2024 draft of the 2023-2031 Housing Element. The 2023-2031 Housing Element ultimately approved by HCD and adopted by Half Moon Bay could contain fewer residential units than 782.⁶ Additionally, the voters of Half Moon Bay adopted Measure D in 1999, a growth control measure that restricted the number of new dwelling units that the City can permit in any given year. Nonetheless, the analysis in this Initial Study uses a conservative analysis by assuming full buildout of the estimated 782 residential units envisioned in the proposed Housing Element Update over the eight-year planning period. Accordingly, based on build out of 782 units, there would be up to 1,908 new residents by the year 2031.⁷ This number of new residents would increase the current

⁶ This Initial Study-Mitigated Negative Declaration evaluates development of up to 782 dwelling units, providing a conservative analysis of environmental impacts. The analysis of environmental impacts is considered conservative because the severity of impacts are directly correlated with the amount of development envisioned in the Housing Element. If 782 or fewer dwelling units are ultimately included in the Housing Element, this Initial Study – Mitigated Negative Declaration will sufficiently and adequately serve to analyze and disclose the potential environmental impacts of implementing the 2023-2031 Housing Element.

⁷ 782 dwelling units X 2.44 people per unit = 1,908.08 people (rounding down to 1,908 people)

estimated population of Half Moon Bay to 13,211, which is fewer residents than the ABAG projections.

The population and residential growth that could result from build out of the proposed Housing Element Update would not be unplanned growth. The proposed Housing Element Update is a plan for residential development, including the future residents of the development. Furthermore, the predicted population growth that could be induced from build out of the 2023-2031 Housing Element would not exceed regional projections and is accounted for in the LUP, which plans for a population of up to 14,535 persons by 2040 (Half Moon Bay 2020c). Because the full buildout of the project is anticipated in existing plans, the project would not result in substantial unplanned population growth and impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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

Project development under the Housing Element Update would involve new development and redevelopment projects on infill sites and underutilized parcels, as well as development on currently undeveloped sites. Redevelopment or infill projects could result in the displacement of some existing housing units and residents. Under the 2023-2031 Housing Element, development on non-vacant sites must comply with the housing replacement requirements in California Government Code Section 65583.2(g)(3), which specifies that any multi-family residential development on a non-vacant site must replace any existing on-site housing units subject to a recorded covenant, ordinance, or law that restricts rents to levels affordable to persons and families of lower or very low income, or are otherwise subject to any form of rent or price control.

The 2023-2031 Housing Element would facilitate development that would provide additional opportunities for housing by expanding areas where housing (including affordable housing) is allowed, and by increasing the allowable density of current residential areas. The 2023-2031 Housing Element would facilitate development that would create a net increase in the number of available housing units in the city. Replacement housing needs created by displacement of existing housing would be offset through implementation of the 2023-2031 Housing Element. Therefore, impacts related to displacement associated with the Housing Element Update would be less than significant.

LESS THAN SIGNIFICANT IMPACT

15 Public Services

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the 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:				
1 Fire protection?	☐	☐	☒	☐
2 Police protection?	☐	☐	☒	☐
3 Schools?	☐	☐	☒	☐
4 Parks?	☐	☐	☒	☐
5 Other public facilities?	☐	☐	☒	☐

Setting

Fire services in the City of Half Moon Bay are provided by the Coastside Fire Protection District. Since mid-2011, law enforcement services have been provided to the community of Half Moon Bay through a contract with the San Mateo County Sheriff's Office (City of Half Moon Bay 2024). The Coastside Bureau division of the San Mateo County Sheriff's Office serves the City of Half Moon Bay and is currently staffed with 27 full time Deputy Sheriff's, four Sergeants and one Lieutenant, and is staffed at a level to adequately meet enforcement needs (San Mateo Sheriff's Office 2024). Students are primarily served by the Cabrillo Unified School District (CUSD 2023). There is one County Library within the City located at 620 Correas Street (SMCL 2023).

The City's LUP establishes a standard of five acres of parkland per 1,000 residents, which is the maximum allowable parkland dedication requirement pursuant to the Quimby Act. The City has 71.4 acres of parkland (City of Half Moon Bay 2019b).

Impact Analysis

- a.1. *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities, or the need for new or physically altered fire protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives?*

- a.2. *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered police protection facilities, or the need for new or physically altered police protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives?*
- a.3. *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered schools, or the need for new or physically altered schools, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives?*
- a.5. *Would the project result in substantial adverse physical impacts associated with the provision of other new or physically altered public facilities, or the need for other new or physically altered public facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives?*

The 2023-2031 Housing Element identifies sites for residential development in order for the City to satisfy its RHNA requirement. The Housing Element does not envision development of public facilities, such as new fire stations, police stations, schools, or libraries. As discussed in *Population and Housing*, development facilitated by the 2023-2031 Housing Element would not exceed growth already anticipated in the City's LUP or regional projections. Given the geographic size and current population of the City, construction of new fire stations, police stations, or libraries to serve the incremental population increase is not anticipated, as the entire City is adequately serviced by existing facilities. Police service is provided by the San Mateo County Sheriff's Office, and the additional growth envisioned in the Housing Element would be an incremental increase in the size of San Mateo County. Fire service is provided by the Coastside Fire Protection District. This district serves approximately 30,000 residents (Coastside Fire Protection District 2023). Therefore, the additional growth envisioned in the Housing Element would be an incremental increase in the size of the District's protection area. Additionally, most of the housing sites are infill sites and would not require the local fire department or police department to expand their service boundary or area.

Should the County determine that new or expanded library facilities are needed, it is not known where such facilities would be located. However, the additional facilities would likely be an extension of the existing library or a new branch on an infill site where sensitive environmental resources are generally not prevalent or common. As infill development, it is not anticipated that the construction of a new or expanded library facility would cause additional significant environmental impacts beyond those identified in this IS-MND.

Residential growth would generate increased school enrollment in local schools, primarily within the Cabrillo Unified School District. Applicants for individual housing development projects would be required to pay development impact fees to the Cabrillo Unified School District at the time of the building permit issuance in accordance with SB 50. The Cabrillo Unified School District would use collected funds towards new facilities to offset any impacts associated with new the residential development. Pursuant to California Government Code Section 65996, payment of these fees is deemed to fully mitigate cumulative CEQA impacts of new development on school facilities. Therefore, payment of state-mandated impact fees would reduce the project project's potentially cumulatively considerable environmental impacts on school facilities to less than significant levels.

LESS THAN SIGNIFICANT IMPACT

- a.4. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered parks, or the need for new or physically altered parks, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives?*

The City's LUP establishes a standard of five acres of parkland per 1,000 residents, which is the maximum allowable parkland dedication requirement pursuant to the Quimby Act. According to the City's Parks Master Plan, the City currently provides and exceeds five acres of developed parks per 1,000 residents, meeting its LUP standard (City of Half Moon Bay 2019). Residential development envisioned in the Housing Element would increase the population as people move into the new housing. As described in Section 14, *Population and Housing*, full buildout of the proposed Housing Element Update would equate to approximately 1,908 new residents by the year 2031, bringing the total population of Half Moon Bay to approximately 13,211 people. This population would require approximately 66 acres of parkland to satisfy the LUP standard of five acres per 1,000 residents. According to the City's recently adopted Parks Master Plan, the City has 71.4 acres of parkland (City of Half Moon Bay 2019b). Therefore, the proposed project would not result in unacceptable service ratios for parks. The 2023-2031 Housing Element identifies sites for residential development for the City to satisfy its RHNA requirement. While the 2023-2031 Housing Element would increase the use of parks within the city, it does not envision or propose development or expansion of public parks. Accordingly, the proposed Housing Element Update would not result in physical park expansions or construction, resulting in environmental impacts. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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16 Recreation

	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?	☐	☐	☐	☒

The City of Half Moon Bay includes 71.4 acres of Parkland (City of Half Moon Bay 2019b) spanning across several types of parks such as neighborhood parks, community parks, special use parks, and City beaches (Half Moon Bay 2019b). As of 2019, the total city park acreage per thousand residents was 6.1 acres, which exceeds the LUP standard of five acres of parkland per 1,000 residents, which is the maximum allowable parkland dedication requirement pursuant to the Quimby Act.

Impact Analysis

- 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?*

As discussed in Section 15, *Public Services*, full buildout of the Housing Element Update would increase the population of Half Moon Bay, and at least a portion of the new or additional population would likely utilize parks and other recreational facilities in the city and region. However, city parks and other regional parks and recreational areas, such as state parks, are maintained to reduce or prevent deterioration from becoming substantial. The incremental addition of residents as buildout of envisioned housing occurs would not overwhelm or overburden park maintenance activities such that substantial physical deterioration occurs. Furthermore, future development facilitated by the 2023-2031 Housing Element would be required to comply with Chapter 18.31 of the HMBMC, which requires a park facility development fee to be paid by developers for the construction of each residential unit within the City. These fees would be applied towards upkeep and maintenance of park and recreational facilities. Accordingly, impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- 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 2023-2031 Housing Element identifies sites for residential development for the City to satisfy its RHNA requirement. The Housing Element does not envision development of public parks.

Accordingly, the proposed Housing Element Update would not directly result in the construction or expansion of parks and recreational facilities. As discussed in Section 15, *Public Services*, there is already sufficient park acreage in the City to meet LUP service ratios, even with potential buildout of the housing envisioned in the Housing Element Update. Moreover, on larger sites, there is room for parkland; for example, one site referred to as “Creekside” includes an on-site active open space area in the approved subdivision. Another example is the housing site known as “Podesta Planned Development.” The preliminary plans for the Podesta Planned Development include on-site open space which would be large enough to offset payment of parkland fees pursuant to the Quimby Act. Accordingly, the proposed project would not require the construction or expansion of parks. There would be no impact.

NO IMPACT

17 Transportation

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would implementation of the 2023-2031 Housing Element:				
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 use (e.g., farm equipment)?	☐	☐	☒	☐
d. Result in inadequate emergency access?	☐	☐	☒	☐

Setting

The main roadways in Half Moon Bay are Highway 1, which provides north to south connectivity within the city, and State Route 92 which provides east to west connectivity. These roadways serve as regional connections to San Francisco to the north, San Mateo to the east and Santa Cruz to the south. In addition to these highways, the city includes arterial, collector, and local access roadways. Additional setting information related to transit, bicycle and pedestrian facilities is incorporated into the checklist discussions below.

SB 743 (2013) changed the way that public agencies evaluate the transportation impacts of projects under CEQA, recognizing that roadway congestion, while an inconvenience to drivers, is not itself an environmental impact. (See PRC Section 21099(b)(2) ["automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion shall not be considered a significant impact on the environment pursuant to [CEQA]".])

Under SB 743, the Governor's Office of Land Use and Climate Innovation (LCI) established VMT as the preferred metric for measuring transportation impacts of most projects in place of vehicle level of service (LOS) or related measures of congestion as the primary metric. The use of VMT for determining significance of transportation impacts has become commonplace since the certification of this provision and the release of OPR's Technical Advisory on Evaluating Transportation Impacts in CEQA in December 2018; as of July 1, 2020, is the required metric statewide.

Impact Analysis

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

Transit

The San Mateo County Transit District operates transit in Half Moon Bay. Most transit stops are along Highway 1, SR-92, and in the downtown area along Main Street and Kelly Avenue (San Mateo County Transit District 2023). The 2023-2031 Housing Element includes housing sites on Main Street in proximity to existing transit stops. During construction, installation or connection of utilities or roadway frontage improvements could temporarily impact transit stops. Because the transit stops are owned by the San Mateo County Transit District, applicants or developers of housing projects would be required to coordinate with the San Mateo County Transit District to ensure transit operations are not interrupted and transit stops meet District standards. Impacts related to programs, plans, ordinances, and policies addressing the transit component of the circulation system would be less than significant.

Roadways

The 2023-2031 Housing Element does not include or envision new roadways or additions to the circulation system. Some of the housing sites could have internal access roadways, but internal roadways would generally be traveled by residents living on that site or property. Internal access roadways on housing sites would not affect the existing public roadways other than new driveways and temporary construction delays. Internal access roadways and driveways at housing sites would intersect existing roadways comprising the circulation system. The HMBMC Chapter 17.40 includes design standards which outline requirements for new access driveways. These include minimum standards for width, grade, angle, surface, and clearance. The City of Half Moon Bay Department of Public Works, City of Half Moon Bay Planning Division, and the San Mateo County Fire Protection District would review individual project designs to determine if those standards would be satisfied. This review and approval process would ensure new driveway intersections do not conflict with the roadway system. Impacts with programs, plans, ordinances, and policies addressing the roadway component of the circulation system would be less than significant.

Bicycle and Pedestrian Facilities

Most of the housing sites identified in the 2023-2031 Housing Element are in proximity to the downtown area of Half Moon Bay. This would encourage walking to commercial services on and near Main Street and at the commercial developments located north of the intersection of Highway 1 and SR-92, such as restaurants, shops, and grocery stores. Therefore, rather than conflicting with transportation policies and plans, like the Half Moon Bay Bicycle and Pedestrian Master Plan (Half Moon Bay 2019a), the Housing Element Update would support implementation of these plans by accommodating non-vehicular travel, thereby reducing VMT. Some housing sites are located on or near properties where a trail exists or is proposed; however, development of the housing sites will not interfere with existing or future trails because the trails will be located within public right-of-way and/or conservation easements that were established in part to facilitate trails. Additionally, proximity to these trails would support the active transportation modes, such as walking and cycling, which would promote City transportation policies. Therefore, the Housing Element Update would not conflict with programs, plans, ordinances, and policies addressing the bicycle and pedestrian component of the circulation system. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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

CEQA Guidelines Section 15064.3(b) require specific considerations of a project's transportation impacts based on vehicle miles traveled (VMT). This implements SB 743, which eliminates level of service (LOS) as a basis for determining significant transportation impacts under CEQA and requires a different performance metric: VMT. With this change, the State shifted the focus from measuring a project's impact upon operations (LOS) to measuring the impact of driving (VMT) on achieving its goals of reducing GHG emissions, encouraging infill development, and improving public health through active transportation.

DKS Associates, a transportation and traffic engineering firm, prepared a VMT analysis of the proposed 2023-2031 Housing Element.⁸] The DKS VMT analysis, incorporated herein by reference and included as Appendix A to this Initial Study, determined that the project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3. The methodology and results of the VMT analysis are described in detail in Appendix A. As described in Appendix A, the VMT analysis was conducted using the travel demand model jointly maintained by the Santa Clara Valley Transportation Authority (VTA) and City/County Association of Governments (C/CAG). The standard scenario years included in the VTA-C/CAG travel demand model are 2015, 2025, and 2040. Because of these standard years, DKS created a custom set of land use inputs for a 2022 scenario to represent baseline conditions. The 2022 land use inputs for Half Moon Bay Transportation Analysis Zones (TAZs) were developed from the 2018 land use scenario previously developed for the LCP with recent residential permits added as well. Baseline VMT metrics that were calculated using the 2022 scenario are shown in Table 4.

Table 4 2022 Baseline VMT Per Capita

Geography	Home Based VMT	Population	Baseline VMT Per Capita
Nine-County Bay Area	109,828,741	7,574,265	14.5
San Mateo County	10,049,128	766,522	13.11
Coastal Communities	557,598	23,739	23.49
City of Half Moon Bay	266,731	12,972	20.56

Source: Appendix A, DKS 2023

Consistent with guidance from the Governor's Office of Planning and Research, the significance of VMT generated by implementation of the Housing Element Update was evaluated based on whether the VMT would be at least 15 percent below existing VMT per capita. The transportation and economic environments of the coastal communities in San Mateo County are markedly

⁸ The VMT analysis was prepared for the City's first draft of the 2023-2031 Housing Element, which envisioned up to 772 dwelling units. Last updated in May 2024, the most current draft of the Housing Element envisions up to 782 dwelling units, which is an increase of 10 units compared with the first draft. The additional 10 units are associated with conversion of the Zaballa Hotel to residential units. An update to the VMT analysis to consider the additional 10 units (or a total of 782 units) was not required because the conversion from hotel to residential would result in reduced VMT. The Zaballa Hotel is located at 330 Main Street, central to the downtown area of Half Moon Bay, proximate to most services, such as grocery stores, schools, the library, restaurants, and other retailers. This proximity would encourage walking or bicycling by future residents. Additionally, downtown retailers have limited parking supply, and in many cases only public street parking is available. This would discourage residents of the Zaballa Hotel conversion from driving to services and retailers when considered in context with ease of walking or biking given the proximity between the hotel conversion site and downtown businesses and services. Further, the hotel requires staff, such as front desk clerks and housekeeping to travel to the site daily, generating VMT. The conversion from hotel to residential would eliminate the VMT currently generated by hotel staff. Finally, the VMT analysis need not be updated only because the conversion from hotel to residential would slightly increase the resident population of Half Moon Bay, as the measurement of VMT per capita is a function of total population. When VMT remains the same or is reduced but population increases, the VMT per capita decreases

different from those on the San Francisco Bay side. For example, the San Francisco Bay side of the County has a robust public transportation system, including CalTrain and BART. For this reason, 15 percent of a VMT baseline representative of the coastal communities was selected as the appropriate threshold of significance for this analysis and aligns with the draft standard for VMT currently under City review. As shown in Table 4 above, baseline VMT in the coastal communities is 23.49 per capita. Eighty-five percent of the baseline VMT in the coastal communities, which would represent a 15 percent reduction, is 19.97 VMT per capita.

Projected VMT for 2040 was compared to baseline 2022 VMT to determine if the Housing Element Update would conflict with CEQA Guidelines Section 15064.3. The year 2040 was used for the analysis because buildout of the residential development would occur over years and occupancy/residency would occur afterward, leading to long-term and gradual additional VMT rather than the full VMT of the Housing Element occurring immediately in the baseline year. The 2040 Half Moon Bay land use inputs were developed by adding the units from housing opportunity sites and pipeline projects to 2022 totals and then adding these units to the VTA-C/CAG travel demand model for 2040. This approach provides a conservative analysis of cumulative VMT impacts of the Housing Element because it assumes all development through 2040 would occur during the 6th cycle RHNA (i.e., between now and 2031), when in reality it likely would not due to factors beyond the control of the City, such as economic cycles. As described in Appendix A, in 2040, with buildout of the residential development envisioned in the 2023-2031 Housing Element Update, VMT in the coastal communities would be 18.58 per capita. The VMT of the Housing Element Update would therefore be below the threshold of significance, which is calculated at 19.97 VMT per capita. Accordingly, impacts related to conflicts with CEQA Guidelines Section 15064.3 would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- c. *Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible use (e.g., farm equipment)?*
- d. *Would the project result in inadequate emergency access?*

Implementation of the 2023-2031 Housing Element could involve projects that would introduce new driveways or access roads to sites that are currently developed or those that are currently undeveloped, such as the housing sites east of Highway 1 and north of Kelly Street. The HMBMC Chapter 17.40 includes design standards which contain requirements for new access driveways. These include minimum standards for width, grade, angle, surface, and clearance. The City of Half Moon Bay Department of Public Works, City of Half Moon Bay Planning Division, and the San Mateo County Fire Protection District would review individual project designs to determine if those standards would be satisfied. Because most projects that would be developed under the 2023-2031 Housing Element would be infill projects, they would not involve creating new roadways or intersections or incompatible uses within Half Moon Bay. The housing sites that are currently undeveloped have direct access to existing local streets. While new intersections of existing local streets with proposed new streets internal to these sites may be created if these sites are developed, they would be subject to the standards and review/approval described above to ensure hazards from design features or incompatible uses are not created. Review and approval of access by the San Mateo County Fire Protection District would also ensure proper emergency access is provided at individual housing development projects. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

18 Tribal Cultural Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in a Public Resources Code Section 21074 as either a site, feature, place, or 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:				
a. 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)?	☐	☐	☒	☐
b. 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 Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☐	☐	☐

Setting

As of July 1, 2015, California Assembly Bill 52 of 2014 (AB 52) was enacted and expands CEQA by defining a new resource category, "tribal cultural resources." AB 52 establishes that "A project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment" (PRC Section 21084.2). It further states that the lead agency shall establish measures to avoid impacts that would alter the significant characteristics of a tribal cultural resource, when feasible (PRC Section 21084.3).

PRC Section 21074 (a)(1)(A) and (B) defines tribal cultural resources as "sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe" and is:

1. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in PRC Section 5020.1(k), or

2. 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 PRC Section 5024.1. In applying these criteria, the lead agency shall consider the significance of the resource to a California Native American tribe.

AB 52 also establishes a formal consultation process for California tribes regarding those resources. The consultation process must be completed before a CEQA document can be certified. Under AB 52, lead agencies are required to “begin consultation with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project.” Native American tribes to be included in the process are those that have requested notice of projects proposed within the jurisdiction of the lead agency.

California Government Code Section 65352.3 (adopted in 2004 pursuant to the requirements of Senate Bill 18 [SB 18]) requires local governments to contact, refer plans to, and consult with tribal organizations prior to making a decision to adopt or amend a general or specific plan. The tribal organizations eligible to consult have traditional lands in a local government’s jurisdiction, and are identified, upon request, by the NAHC. As stated in the California Office of Planning and Research’s Tribal Consultation Guidelines (2005), “The intent of SB 18 is to provide California Native American tribes an opportunity to participate in local land use decisions at an early planning stage, for the purpose of protecting, or mitigating impacts to, cultural places.”

As required by SB 18 and AB 52, the City mailed consultation letters between May 23, 2022 and July 5, 2022 to contacts identified by the Native American Heritage Commission that requested the City of Half Moon Bay to notify them of projects subject to AB 52 or SB 18. Under AB 52, Native American tribes have 30 days to respond to consultation notification and request further project information and formal consultation; under SB 18 Native American tribes have 90 days to respond requesting consultation. The City did not receive any responses requesting consultation within either the 30- or 90-day periods. No consultation requests have been received as of the end of October 1, 2023.

Impact Analysis

- a. *Would the project cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code Section 21074 that is 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)?*
- b. *Would the project cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code 21074 that is 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?*

Project development would primarily occur on infill sites in areas with existing infrastructure and in areas that have been developed and disturbed previously. It is likely that previous grading, construction, and modern use of the sites would have either removed or destroyed tribal cultural resources within surficial soils. There are some housing sites that are currently undeveloped, such as those along the eastern city boundary, where the potential to encounter subsurface tribal cultural resources may be higher. However, there is still potential for subsurface tribal cultural resources throughout the city that could be disturbed by grading and excavation activities associated with new housing development. The 2020 LUP goals and policies 8-1, 8-2, and 8-3 as discussed in Section 5,

Cultural Resources, would apply to TCRs as well. In addition, the LUP contains specific policies related to Native American Cultural Resources consistent with SB 18, AB 52, and Coastal Commission policy and are as follows:

2020 Local Coastal Land Use Plan

- Policy 8-5 Native American Cultural Sites.** Work with local Native American tribes to protect sacred and culturally significant sites, as well as discovered Native American artifacts and remains.
- Policy 8-6 Native American Consultation.** Notify and consult with Native American organizations of proposed developments or land use actions that have the potential to adversely impact cultural resources early in the development review process, providing early and frequent opportunities for concerned Native American parties to comment on or participate in any treatment plan for sites with cultural or religious significance to the Native American community. Development on sensitive sites requires on-site monitoring by appropriate Native American consultant(s) such as tribal monitors and a qualified archaeologist for all grading, excavation, and site preparation activities that involve earth-moving operations.

Effects on tribal cultural resources would be less than significant with implementation of these policies, and the policies discussed in Section 5, during development of the housing sites identified in the Housing Element Update.

LESS THAN SIGNIFICANT IMPACT

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19 Utilities and Service Systems

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would implementation of the 2023-2031 Housing Element:				
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?	☐	☐	☒	☐

Setting

Water

Water for the residential development would be provided by the Coastsides County Water District. According to the Coastsides County Water District's 2020 Urban Water Management Plan (UWMP), available local supplies of water is used first to meet demand, and then additional supplies are purchased from the San Francisco Public Utilities Commission as needed to meet the normal year demands. Through the year 2045, the Coastsides County Water District's normal year supplies are adequate to meet projected normal year demands. However, the District's single dry year and multiple dry year supplies are not adequate to meet projected demands (Coastsides County Water

District 2020). Significant supply shortfalls, ranging from 22 to 29 percent to 53 to 59 percent in the fifth year of the five-year dry period, are projected. This shortfall is primarily due to significant cutbacks in the District's supply from the San Francisco Public Utilities Commission which is significantly reduced in dry years due to the Bay-Delta Plan Amendment. Overall, supply shortages would range from 20 to 27 percent in the fifth dry year of the five-year dry period (Coastside County Water District 2020).

As part of the 2020 UWMP, Coastside County Water District also prepared a Water Shortage Contingency Plan which describes the District's strategic plan to prepare for and respond to water shortages (Coastside County Water District 2020). The Water Shortage Contingency Plan includes water shortage levels and associated actions that will be implemented in the event of a water supply shortage. California Water Code (CWC § 350-359) supports and authorizes the District's Contingency Plan actions. The District's Contingency Plan has been updated so that it is consistent with the 2018 Water Conservation Legislation requirements.

Wastewater

Wastewater, which is conveyed to the wastewater treatment facility by sanitary sewers, is conveyed in Half Moon Bay to the Sewer Authority Mid-Coastside (SAM) wastewater treatment plant for treatment and disposal. As of 2020, the wastewater treatment plant was operating with an average annual flow of 1,700,000 gallons per day. However, the plant can operate at 4,000,000 gallons per day with average dry weather flows and up to 15,000,000 gallons per day with peak wet weather flows (SAM 2019). Accordingly, existing operations at the treatment plant use less than 50 percent of the potential treatment capacity regardless of dry weather or peak weather flow conditions.

Solid Waste

The Corinda Los Trancos Landfill (Ox Mountain) Sanitary Landfill would serve new development under the 2023-2031 Housing Element. Ox Mountain is a Class III municipal solid waste landfill and is the only active landfill in San Mateo County, with an expected remaining capacity to receive waste until 2039. Ox Mountain accepts waste from a variety of sources and is restricted to receive a maximum daily throughput of 3,598 tons per day. Ox Mountain, at a minimum, can accept waste until 2039.

The California Integrated Waste Management Act (AB 939), passed in 1989, requires each jurisdiction in California to divert at least 50% of its waste away from landfills through waste reduction, recycling, or other means. Chapter 18.31 of the HMBMC addresses the reduction of solid waste through a variety of recycling and reuse requirements, as well as regulations governing recycling facilities.

Impact Analysis

- 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?*

Projects carried out under the 2023-2031 Housing Element would be in areas of Half Moon Bay that are served by existing utilities infrastructure, including potable water, wastewater, stormwater drainage, electrical power, natural gas, and telecommunications facilities. Connection of new housing units to these existing utilities would require shallow trenching either within existing

roadways where environmental resources do not exist, or on the housing site itself. When trenching and utility connection occurs on the housing site, it would occur in tandem with other grading and construction activities required for residential development. Therefore, the utility connections for new housing would not result in additional or more severe impacts due to construction of new or expanded utilities and service systems than identified in this Initial Study for the proposed Housing Element Update.

Additionally, Chapter 3 of the LUP includes policies for public works standards in Half Moon Bay and establishes several regulatory requirements for the provision of domestic water, sewage treatment, and utility services to the entire community, many of which are described in Section 10, *Hydrology and Water Quality*, of this Initial Study. Some specific policies in the City's LUP that would be applicable include:

- Policy 3-1 Infrastructure Capacity.** New or expanded public infrastructure, including water, sewer, and transportation facilities, shall be designed and limited to accommodate needs generated by development or uses permitted consistent with this Land Use Plan and the Chapter 3 requirements of the Coastal Act.
- Policy 3-2 Monitor Growth and Infrastructure Capacity.** Monitor growth and infrastructure capacity annually for Coastal Act Priority Uses, Local Priority Uses, and Non-Priority Uses. Publish reports summarizing changed conditions that may affect growth, infrastructure capacity, or the regulatory requirements associated with infrastructure and development.
- Policy 3-3 Coastal Act and Local Priority Uses.** In the event that growth and capacity monitoring indicate that water supply and the associated classifications of water connections or sewer capacity will not be adequate to maintain public works capacity reservations for Coastal Act and Local Priority Uses or to support buildout of the Town Center, the City shall establish a public works capacity allocation process. In all cases, infrastructure reservations shall be prioritized according to the following tiering:
1. Coastal Act Priority Uses: Coastal-dependent, agriculture including farmworker housing, visitor-serving uses, recreation, habitat conservation/restoration, and essential services;
 2. Local Priority Uses: Affordable housing;
 3. Non-Priority Uses: Market-rate housing, general industrial, general commercial. Allocations of infrastructure capacity for Non-Priority Uses will not be granted in the event that it would preclude development of Coastal Act Priority and Local Priority Uses.
- Policy 3-4 Town Center Infrastructure.** The City shall plan for, fund through development impact fees and other sources, and implement infrastructure improvement projects or allocation systems, including for water, sewer, transportation, and stormwater, to support buildout of the Town Center.
- Policy 3-5 Coastal Development Permit for Public Works.** Require any public utility, government agency, or special district proposing a development project in the City to obtain a coastal development permit, unless explicitly exempted by the LCP, Coastal Act, or other controlling law.

- Policy 3-6 New Development Requirements and Findings.** Require that all new development has available municipal water and sewer services and access from a public street or over private streets to a public street where these improvements or facilities are essential to the type of development. Prior to approval of a coastal development permit, the approving authority shall determine if infrastructure, including water connections, is available and adequate; and if so, shall make the finding that such development will be served with water, sewer, and road facilities, including such improvements as are provided with the development. Lack of available services or resources shall be grounds for denial of the project or reduction in the density otherwise indicated in the Land Use Plan. Some development types may be exempt from the requirements of this policy such as habitat restoration, trails and other coastal recreational uses, and many agricultural and agricultural supplemental and ancillary uses.
- Policy 3-7 System Improvements.** Allow system improvements to occur to address health and safety needs such as replacing aging infrastructure; ensuring sufficient water capacity for fire flow; improving system capacity to prevent sewer overflows; using green infrastructure in public and private development projects to prevent erosion, sedimentation, or flooding; and providing passing lanes for emergency vehicles. Such improvements are intended to address health, safety, and changing design standards, shall not be growth inducing, shall be phased if they constitute a significant system update, and shall comply with Policy 3-1.
- Policy 3-9 Municipal Service Provisions.** Only provide municipal services including water, sewer, and roads to areas approved for development, except where services are required for permitted restoration, agricultural, agricultural compatible, and recreational uses. In the case of Planned Developments, prior to master plan approval, provide services only for those uses allowed in advance of master plan approval.

Because existing utilities are present in proximity to housing sites, and LUP policies would be implemented, impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- 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?*

Assuming full buildout of the proposed Housing Element Update, up to 782 residential units would be constructed in Half Moon Bay.⁹ Each unit would consume water for activities like cooking, washing, flushing toilets, and so forth. Water would also be required for lawn maintenance and landscape irrigation. This would increase demand for water in Half Moon Bay.

With implementation of the Water Supply Contingency Plan, as needed during droughts, sufficient supplies would be available to serve the residential development envisioned in the proposed Housing Element Update and other existing and reasonably foreseeable water demands.

⁹ By evaluating up to 782 units, this Initial Study – Mitigated Negative Declaration provides a conservative analysis of environmental impacts because impacts, such as water use and demand, are related to the number of residential units.

In addition to the Coastsides County Water District's Water Supply Contingency Plan, the City's LUP Public Works Chapter also has policies that would reduce water demand of the residential development envisioned in the Housing Element Update. These policies include:

Policy 3-13 Water System Capacity Monitoring. The City shall review CCWD's annual water sales reports for each land use category; consider remaining water capacity to ensure water supply is sufficient to maintain the City's water reserves for Coastal Act and Local Priority Uses; and evaluate water supply adequacy for remaining buildout of the LUP.

Policy 3-14 New Water Connections. Support establishment of new water connections for the different use categories to serve sustainable development and LUP priorities for uses as specified:

1. Coastal Act Priority Uses: Coastal-dependent, agriculture including farmworker housing, and other Coastal Act Priority Uses with lower water demand;
2. Local Priority Uses: Affordable housing; and
3. Non-Priority Uses: Only after ensuring that efficiency measures for existing development meet or exceed conservation requirements or a reclaimed water supply is developed, and if development of such uses would not adversely impact other infrastructure systems, and if allocation of Non-Priority Use water connections would not preclude development of Coastal Act or Local Priority Uses.

If CCWD obtains a coastal development permit or permit amendment approving an increase in water supply or distribution capacity to provide additional service connections in excess of limitations imposed by conditions of approval for the Crystal Springs Phase 1 coastal development permit, the City shall encourage, or if the City issues the permit, shall require CCWD to not sell connections in advance of development proposals; and shall only approve such permit if robust assessment of the sewer, circulation, and stormwater management systems indicates that additional connections can be served by other infrastructure.

Policy 3-20 Water Connections for New Development. Other than as described in Policies 3-21 and 3-22, new development within the urban boundary shall require a connection to the Coastsides County Water District system. The City shall refer coastal development permit applications for new development or redevelopment projects to CCWD for confirmation of water supply adequacy and consistency with water connection requirements.

Policy 3-25 Water Conservation Measures. Require water conservation measures for new development and redevelopment of residential and non-residential uses, including but not limited to, the use of high-efficiency fixtures and equipment, storm water capture, gray water collection and reuse, drip or microspray irrigation systems, and native drought-tolerant landscaping. For agricultural and horticultural business uses, water conservation policies in Chapter 4 are applicable.

Development projects implemented under the 2023-2031 Housing Element also would be required to conform to the provisions of the California Green Building Code (CALGreen, Title 24, Part 11 of the California Code of Regulations). Individual projects would undergo plan check review to ensure this compliance at the time they are proposed and as part of the permitting process. With adherence to local and State laws and implementation of the LUP water conservation-related policies, and implementation of the Water Shortage Contingency Plan as applicable, impacts associated with implementation of the 2023-2031 Housing Element to water supply would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- 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?*

Each of the 782 units in the Housing Element Update would increase demand for water, a percentage of which becomes wastewater. The incremental addition of housing units resulting from the Housing Element Update would be up to 782 units total. Conservatively assuming that all of these additional units would be single-family and not multi-family units, and would generate the highest amount of wastewater, the proposed project, the growth would require an additional 62,560 gallons per day¹⁰ in sanitary sewer treatment capacity. The additional demand for sanitary sewer treatment would be well within the remaining approximately 2,300,000 gallons per day capacity at the treatment plant. Additionally, the City's LUP states that the Sewer Authority Mid-Coastside wastewater treatment plant has capacity to treat full buildout of the land use scenario envisioned in the LUP (City of Half Moon Bay 2020a). The residential and population growth that would result from development of the housing sites is included in the growth or buildout projections of the LUP. Accordingly, the Sewer Authority Mid-Coastside wastewater treatment plant has sufficient capacity for the proposed project. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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

Assuming full buildout of the proposed Housing Element Update, up to 782 residential units would be constructed in Half Moon Bay.¹¹ Residents of each unit would consume products and generate solid waste, such as discarded food and product packaging. Construction of housing units would also generate solid waste, such as scrap lumber and material packaging (i.e., paint cans, empty boxes of nails, etc.).

In compliance with State legislation, residential development would be required to implement a Solid Waste Diversion Program and divert at least 75 percent of the solid waste generated from the applicable landfill site. In addition, project development that occurs as part of 2023-2031 Housing

¹⁰ Calculated using a single family wastewater generation rate of 80 gallons/ dwelling unit (City of Los Angeles 2006) : 782 dwelling units x 80 gallons = 62,560 gallons.

¹¹ By evaluating up to 782 units, this Initial Study provides a conservative analysis of environmental impacts because impacts, such as solid waste generation, are related to the number of residential units.

Element implementation would comply with federal, State, and local statutes and regulations related to solid waste, such as the California Waste Integrated Waste Management Act (AB 939) and Chapter 18.31 of the HMBMC, as discussed above. Because projected growth under implementation of the 2023-2031 Housing Element is within LUP projections for the 2040 growth horizon (as described in the sanitary sewer analysis, above), this would continue to be the case for development related to 2023-2031 Housing Element implementation (City of Half Moon Bay 2020a). Additionally, as the only permitted solid waste landfill in San Mateo County, it is reasonable to assume that the landfill will submit an application to continue operations beyond 2039. Therefore, it can reasonably be assumed that the landfill would have sufficient capacity to accommodate the City's increased solid waste disposal needs due to development facilitated by the HEU.

For these reasons, residential development envisioned in the 2023-2031 Housing Element would not 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. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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20 Wildfire

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would implementation of the 2023-2031 Housing Element:				
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 downslopes or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☒	☐
e. Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	☐	☐	☒	☐

Setting

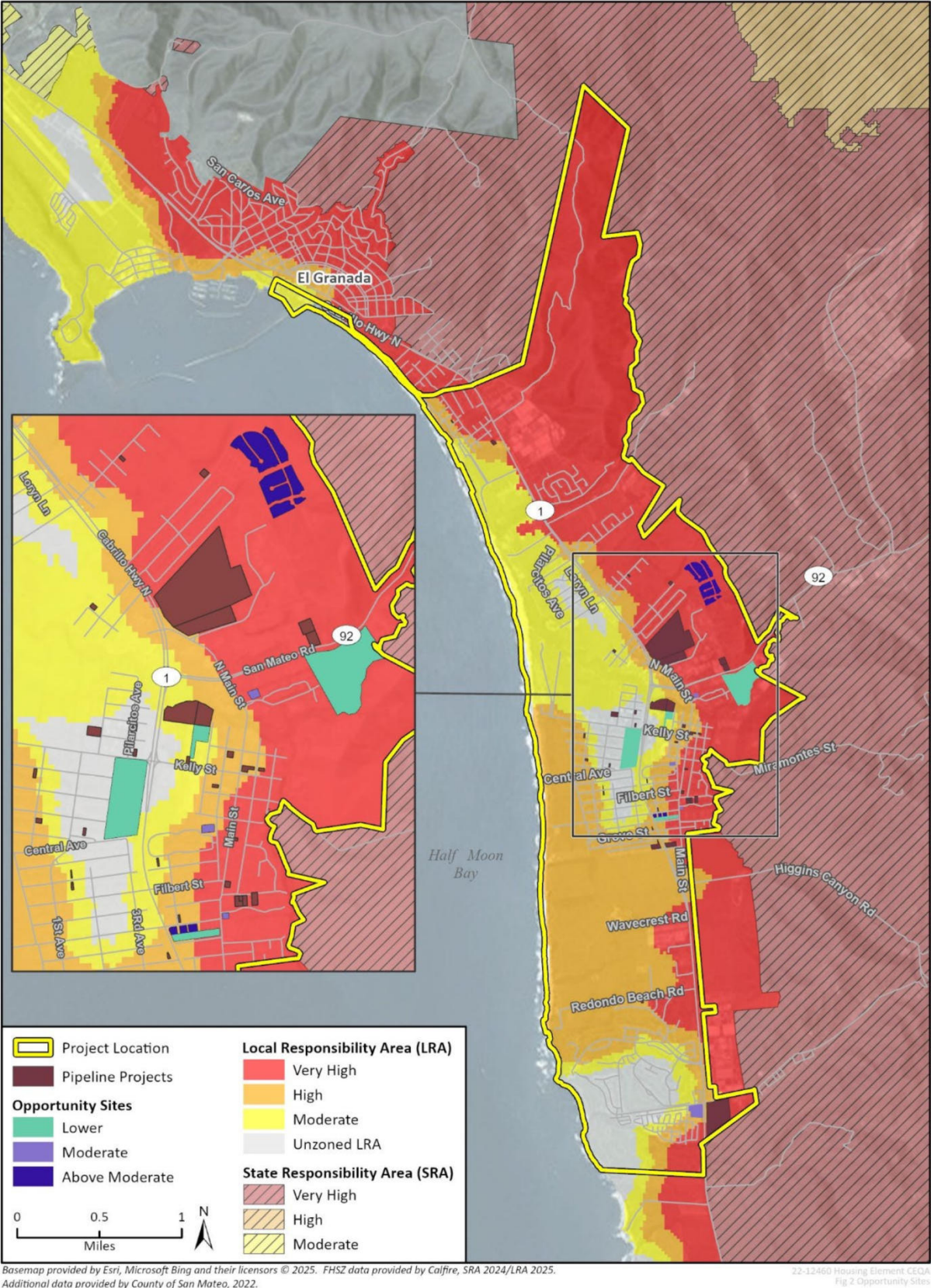
In California, federal, State and local agencies share responsibility for wildfire prevention and suppression. Federal agencies are responsible for federal lands in Federal Responsibility Areas (FRA). The State of California has determined that some non-federal lands in unincorporated areas with watershed value are of statewide interest and have classified those lands as State Responsibility Areas (SRA). CAL FIRE manages SRAs. All incorporated areas and unincorporated lands not in FRAs or SRAs are classified as Local Responsibility Areas (LRA). Additionally, CAL FIRE defines the wildland urban interface (WUI) as areas of dense housing adjacent to vegetation that can burn in a wildfire (CAL FIRE 2015).

While nearly all of California is subject to some degree of wildfire hazard, there are specific features that make certain areas more hazardous. CAL FIRE is required by law to map areas of significant fire hazards based on fuels, terrain, weather, and other relevant factors (Public Resources Code 4201-4204, California Government Code 51175-89). As described above, the primary factors that increase an area's susceptibility to fire hazards include slope, vegetation type and condition, and atmospheric conditions. CAL FIRE maps fire hazards based on zones, referred to as Fire Hazard Severity Zones (FHSZ). There are three levels of severity: 1) moderate FHSZs; 2) high FHSZs; and 3) Very High Fire Hazard Severity Zones (VHFHSZ). As of 2022, State law requires CAL FIRE to map the Moderate and High FHSZ in addition to the Very High FHSZs in LRAs. Updates to the CAL FIRE SRA FHSZ maps were completed in 2024 and updates to the CAL FIRE LRA FHSZ maps were completed in 2025. Only the VHFHSZs are mapped for LRAs.

Each of the zones influence how people construct buildings and protect property to reduce risk associated with wildland fires. However, none of the fire zones specifically prohibit development or construction. To reduce fire risk under State regulations, development within VHFHSZs must comply with specific building and vegetation management requirements intended to reduce property damage and loss of life in those areas.

CAL FIRE develops initial boundaries for VHFHSZs throughout California, but the final boundaries of a VHFHSZ are adopted by each jurisdiction. Areas at risk for wildfire in Half Moon Bay within SRAs are concentrated near the unincorporated areas in northern Half Moon Bay within the undeveloped hillsides and mountainous areas west of State Route 1. A smaller portion of Central Half Moon Bay towards the eastern portion of State Route 92 is within an SRA and a very high FHSZ with areas designated as such both north and south of State Route 92 as well. Much of the city is within an LRA with areas in the eastern portion of the city designated as very high FHSZs and the south central portion of the city classified as a high FHSZ (CALFIRE 2025). Figure 3 shows the proximity of the housing sites to FHSZs within the SRA and LRA.

Figure 3 Housing Site Proximity to Fire Hazard Severity Zones



Impact Analysis

- 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?*

As shown in Figure 3, there are several housing sites within or near very high FHSZs within the LRA in the city. Additionally, several housing sites along the eastern edge of the city are near very high FHSZs in the SRA just outside city limits. Residential construction activities, such as roadway lane closures during utility trenching, could interfere with adopted emergency response or evacuation plans. However, temporary construction used for project development that could impede emergency access would be subject to the City's encroachment permitting process. The encroachment permit application must identify the roads on which construction activities occur and necessary closures, providing the City and fire protection agencies the ability to regulate road closures to address safety concerns. Increased housing development in urban areas of the city under the 2023-2031 Housing Element could also result in additional traffic on area roadways. In the event of a wildfire, implementation of the City's Multi-Hazard Mitigation Plan and Emergency Response Program would provide guidance to City personnel in the event of an evacuation, including traffic coordination. City permitting requirements and implementation of applicable policies (see checklist question e., below) and regulations would ensure that future development under the 2023-2031 Housing Element would not impair or physically interfere with adopted emergency response or evacuation procedures. Therefore, impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- 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 housing sites described in the 2023-2031 Housing Element are primarily infill sites, located on developed or previously developed land. As shown in Figure 3, there are several housing sites within or near very high FHSZs within the LRA in the city. Additionally, several housing sites along the eastern edge of the city are near very high FHSZs in the SRA just outside city limits. Although heavy duty equipment used during construction of individual projects facilitated by the Housing Element Update may produce sparks that could ignite local vegetation, projects would be required to comply with requirements related to construction equipment and fire suppressants (such as California Public Resources Code Section 4442). Development of new buildings and renovations would be required to adhere to the 2022 California Fire Code requirements as adopted in Section 14.04.110 of the HMBMC which include construction and building standards to reduce wildfire risk. Additionally, future development facilitated by the proposed project would be required to comply with regulations in the Wildland-Urban Interface Building Standards which are part of the California Building Code which include regulations for ignition-resistant construction materials and defensible space to reduce the ignition of and spread of wildfires in residential areas. Additionally, the LCP contains the following goals and policies to increase fire safety:

- Policy 7-61** **Minimize Fire Hazards.** Minimize fire hazards in the city by appropriately siting development and managing fuels and ensuring adequate firebreaks and buffers around high-risk areas.

- Policy 7-62** **Fire and ESHA Protection Policy Consistency.** Balance the need for fire protection for existing structures with the need to protect environmental resources. Examples of such measures include sprinkler system retrofits, smart landscaping, restoring ESHAs for better biological function and defensible fire-fighting space, surrounding ESHAs with fire breaks, and limiting activities in areas adjacent to ESHAs.
- Policy 7-63** **Siting and Design for Fire Hazard Avoidance.** Require that both new development and redevelopment, including remodeling and additions, minimize risks to life and property from fire hazard through siting and design considerations. Specifically require that:
- Development is sited and designed to avoid hazardous locations, including to avoid the need for fuel modification within ESHA and ESHA buffer zones;
 - Site-specific characteristics such as topography, slope, vegetation type, and wind patterns are assessed and considered in development plan review;
 - Appropriate building materials and design features to ensure the minimum amount of required fuel modification are utilized; and
 - Landscaping consists of fire-retardant, native plant species.
- Policy 7-64** **Fire Hazard Avoidance Conditions for New Development.** Require, as a condition of approval for new development and redevelopment, that risks to life and property from fire hazards are minimized for the life of the development through:
- Incorporation of fuel modification and brush clearance techniques for the development site and adjacent private or public roads in accordance with applicable fire safety requirements, carried out in a manner which avoids impacts to ESHA and does not diminish its buffer area;
 - Providing adequate ingress and egress for fire equipment access; and landscaping maintenance, including removal of fire-prone, non-native and invasive species such as Cape ivy and Blue gum eucalyptus to reduce fuel load where appropriate, avoiding adverse impacts to sensitive habitats and replacing with fire-retardant, native species of higher habitat value.
- Policy 7-65** **Fuel Modification Zones.** For new habitable structures requiring fuel modification, establish two fuel modification zones as follows: Zone 1 shall extend 30 feet from the exterior walls and requires thinning, pruning, or removal and replacement of vegetation; Zone 2 shall extend between 30 and 100 feet from the exterior walls and requires thinning of non-native vegetation and removal of dead vegetation. The City retains discretion to consider project alternatives, including for siting, design, and use, if either zone includes ESHA.
- Policy 7-66** **Fire Marshal Review.** All discretionary permit applications for new habitable structures shall be reviewed by the City Fire Marshal to determine if fire safety regulations are met, if any thinning or clearing of vegetation is required for fuel modification, and if there is potential for any impacts to existing fire protection services or need for additional and expanded services. The City Fire Marshal retains the discretion to modify the fuel modification requirements on a case-

by-case basis, upon finding that such changes are necessary to protect public safety due to site-specific factors such as building material, topography, vegetation type, and fuel load. However, the City retains discretion to consider project alternatives that would not require such modifications.

Policy 7-68 Fire Hazard Avoidance for New Subdivisions. Ensure that new subdivisions are established with adequate emergency vehicle access, evacuation standards for residential development, and can be maintained without requiring fuel modification within ESHAs and their buffer areas. Prohibit the creation of new developable lots within high fire hazard zones.

Policy 7-70 Emergency Vehicle Accessibility of New Development. Require new development to assure that it can be adequately served by the CFPD, provide adequate access for fire protection vehicles, and guarantee sufficient water supply and fire flow. Development in rural or high fire hazard areas should be clustered near major roads to ensure access.

Policy 7-71 Street Identification and Visibility. Ensure that all roads, streets, and major public buildings are identified in a manner that is clearly visible to fire protection and other emergency vehicles.

Policy 7-73 Fire Flow Upgrades. Work with the CFPD and Coastside County Water District to establish and maintain a priority list for upgrading fire flow capabilities in neighborhoods that may have inadequate fire flows. Fire flow upgrades may require upsizing water mains solely for the purpose of establishing and maintaining adequate fire flow to protect existing development; and not for accommodating future growth. This distinction shall be acknowledged and documented for each such upgrade and restrictions limiting future use of expanded capacity to fire protection shall be implemented.

Because development facilitated by the 2023-2031 Housing Element would primarily be infill development located in already built-out locations and would comply with local and State fire safety provisions and LUP policies listed above, residential development on the housing sites would not exacerbate wildfire risks. Future residents could be exposed to wildfire smoke, like large regions of the United States during summer months or the fire season. However, buildout under the Housing Element would not substantially exacerbate wildfire risk resulting increased concentrations of wildfire smoke or pollutants. Impacts would be less than significant.

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- 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?*

As shown in Figure 3, there are several housing sites within or near very high FHSZs within the LRA in the city. Additionally, several housing sites along the eastern edge of the city are near very high FHSZs in the SRA just outside city limits. Implementation of the 2023-20231 Housing Element would prioritize the development of new housing in urban or development areas of the city near existing utilities and roads. In accordance with State law (SB 1160), new utilities that are required for residential development would be placed underground and would not substantially exacerbate fire

risk or result in other temporary or ongoing impacts to the environment. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- 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 downslopes or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?*

As shown in Figure 3, there are several housing sites within or near very high FHSZs within the LRA in the city. Additionally, several housing sites along the eastern edge of the city are near very high FHSZs in the SRA just outside city limits. The housing sites are primarily infill development, located on developed or previously developed land away from wildfire fuels. However, some housing sites are currently undeveloped and near hillside areas. Hillside areas could be susceptible to landslides or slope failure following a fire, especially intense fires that destroy most of the vegetation cover on hillsides. Development on these sites would be governed by 2020 Local Coastal LUP policies that guide development, such as Policy 7-7. Development in landslide hazard areas would be required to adhere to LUP Chapter 7, Hazards and Climate Change policies that guide development to consider and minimize upstream and downstream hazard potential from new development. LUP Policy 7-7 *Building Codes and Standards* establishes and implements building codes and standards that provide development controls in areas identified in the LUP as hazard areas:

Policy 7-7 Building Codes and Standards. Establish and implement building codes and standards for development siting and construction that avoid or minimize risks from environmental hazards and increase the development's ability to respond and adapt to climate change impacts. Provide additional development controls in areas that are identified in the LCP as hazard areas.

In addition, the LUP includes policies 7-61 through 7-68 and 7-70 through 7-73 that plan for risks that may arise in the future as described above in *Impact b.* of this section. In addition, new development is subject to Chapter 14.04 Building Standards of the HMBMC. Moreover, none of the housing sites are located in areas mapped for high risk of landslides and only two sites are located adjacent areas mapped as having a moderate risk for landslides. The housing sites are predominately located within the urbanized Town Center and all sites were considered with respect to exposure to hazards; therefore, with guidance from the LUP and adherence to the municipal Building Code, flooding and landslides in wildlife burn areas would not pose significant risk to people or housing units within the housing sites. Impacts would be less than significant impact.

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

Because there are housing sites proximate to high and very high fire hazard severity zones, there would be potential for the residences and residents to be exposed to substantial wildfire risks. The LUP includes the following policies which would reduce the wildfire risk potential for the Housing Element Housing sites:

- Policy 7-61** **Minimize Fire Hazards.** Minimize fire hazards in the city by appropriately siting development and managing fuels and ensuring adequate firebreaks and buffers around high-risk areas.
- Policy 7-63** **Siting and Design for Fire Hazard Avoidance.** Require that both new development and redevelopment, including remodeling and additions, minimize risks to life and property from fire hazard through siting and design considerations. Specifically require that:
- Development is sited and designed to avoid hazardous locations, including to avoid the need for fuel modification within ESHA and ESHA buffer zones;
 - Site-specific characteristics such as topography, slope, vegetation type, and wind patterns are assessed and considered in development plan review;
 - Appropriate building materials and design features to ensure the minimum amount of required fuel modification are utilized; and
 - Landscaping consists of fire-retardant, native plant species.
- Policy 7-64** **Fire Hazard Avoidance Conditions for New Development.** Require, as a condition of approval for new development and redevelopment, that risks to life and property from fire hazards are minimized for the life of the development through:
- Incorporation of fuel modification and brush clearance techniques for the development site and adjacent private or public roads in accordance with applicable fire safety requirements, carried out in a manner which avoids impacts to ESHA and does not diminish its buffer area;
 - Providing adequate ingress and egress for fire equipment access; and landscaping maintenance, including removal of fire-prone, non-native and invasive species such as Cape ivy and Blue gum eucalyptus to reduce fuel load where appropriate, avoiding adverse impacts to sensitive habitats and replacing with fire-retardant, native species of higher habitat value.
- Policy 7-66** **Fire Marshal Review.** All discretionary permit applications for new habitable structures shall be reviewed by the City Fire Marshal to determine if fire safety regulations are met, if any thinning or clearing of vegetation is required for fuel modification, and if there is potential for any impacts to existing fire protection services or need for additional and expanded services. The City Fire Marshal retains the discretion to modify the fuel modification requirements on a case-by-case basis, upon finding that such changes are necessary to protect public safety due to site-specific factors such as building material, topography, vegetation type, and fuel load. However, the City retains discretion to consider project alternatives that would not require such modifications.
- Policy 7-68** **Fire Hazard Avoidance for New Subdivisions.** Ensure that new subdivisions are established with adequate emergency vehicle access, evacuation standards for residential development, and can be maintained without requiring fuel modification within ESHAs and their buffer areas. Prohibit the creation of new developable lots within high fire hazard zones.

The housing sites described in the 2023-2031 Housing Element are primarily infill development, located on previously developed land and away from wildfire fuels. However, the above LUP policies would reduce the wildfire risk for those Housing sites located in areas susceptible to wildfire. For these reasons, the 2023-2031 Housing Element's potential to expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires would be less than significant.

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21 Mandatory Findings of Significance

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Does the project:				
a. 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. 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. Have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☒	☐

- 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?*

As described in Section 4, *Biological Resources*, the housing sites proposed in the 2023-2031 Housing Element Update consist mostly of infill development or sites already near developed urban uses. The sites are generally located away from riparian and other sensitive habitats. However, several sites are located on or adjacent to Pilarcitos Creek. Adherence with LUP goals and policies would minimize impacts from potential direct effects to special-status species and project implementation. As described in Section 4, migratory nesting birds could be impacted by residential development, but the potentially affected nesting migratory birds are not endangered and entire populations would not be eliminated. Implementation of Mitigation Measure BIO-1, identified in

this Initial Study, would reduce impacts to migratory nesting birds to levels that are less than significant.

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- 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.)*

As described in the discussion of Sections 1 through 20 of this Initial Study, the proposed project would have no impact, a less than significant impact, or a less than significant impact with mitigation incorporated for all environmental issues. These include short-term, long-term, and where appropriate, cumulative impacts. The analysis of the proposed project is inherently cumulative in nature because the project is a plan/program identifying potential future development sites to accommodate the City’s RHNA allocation over the 2023-2031 planning period.

Certain resource areas (e.g., mineral resources) were determined to have no impact in comparison to existing conditions. Therefore, the project would not contribute to cumulative impacts related to these issues. Other issues (e.g., archaeological and paleontological resources, geology and soils, and hazards and hazardous materials) are by their nature project-specific and impacts at one location do not add to impacts at other locations or create significant additive impacts. In addition, the proposed project would not generate population growth substantially in exceedance of regional and City forecasts; therefore, it would not make a considerable contribution to significant cumulative increases in demand for public services, or utilities such as water, wastewater, and solid waste service. The project’s contribution to cumulative impacts would not be cumulatively considerable.

LESS THAN SIGNIFICANT IMPACT

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

Generally, impacts to human beings associated with air quality contaminants, hazards related to adverse geologic conditions, exposure to hazards and hazardous materials, excessive noise, emergency access, and wildfires. All potential impacts associated with construction and implementation of the project identified in this Initial Study are either less than significant after mitigation (Biological Resources) or less than significant and do not require mitigation (all other impacts analyzed in this Initial Study). Implementation of BMPs, LUP policies, and compliance with state and federal regulations protecting human and environmental health during construction would ensure that potential impacts are less-than-significant or reduced to a less-than-significant level. Therefore, the proposed project would not result, either directly or indirectly, in substantial adverse effects related to these issues, resources, and hazards. Compliance with applicable rules and regulations described throughout this Initial Study would reduce potential impacts on human beings to a less than significant level.

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Appendix A

Vehicle Miles Traveled Study



MEMORANDUM

DATE: September 5, 2023

TO: George Dix | Rincon Consultants

FROM: Erin Vaca | DKS Associates
Zoey Li | DKS Associates

SUBJECT: VMT Analysis for Half Moon Bay Housing Element Update

Project #22204-000

This memorandum documents the VMT analysis conducted for the Half Moon Bay Housing Element Update.

METHODOLOGY

The VMT effects of the pipeline and opportunity housing sites was analyzed with the travel demand model jointly maintained by the Santa Clara Valley Transportation Authority (VTA) and City/County Association of Governments (C/CAG). The VMT calculations were made using the production-attraction trip tables and travel cost skims generated by 2022 and 2040 scenarios.

LAND USE INPUT DEVELOPMENT

Because the VTA-C/CAG travel demand model standard scenario years are 2015, 2025, and 2040 set up, a custom set of land use inputs for a 2022 scenario was developed for this analysis. The 2022 land use inputs for Half Moon Bay Transportation Analysis Zones (TAZs) were developed from the 2018 land use scenario previously developed for the Local Coastal Plan with recent residential permits added, as shown in **Table 1**. The commercial development total for the same period was 9,739 sq. ft. and was estimated to add 19 jobs to Half Moon Bay TAZs since 2018. All other TAZ land use inputs developed for the 2022 scenario were interpolated from the standard 2015 and 2025 scenarios¹. The TAZs included in calculations for the City of Half Moon Bay include TAZs 1556-1558 as shown in **Figure 1**.

¹ The model version is the "CCAG 2020" received from VTA in February 2021 and is consistent with Plan Bay Area 2040 generation of land use forecasts.

The 2040 Half Moon Bay land use inputs were developed by adding the units from housing opportunity sites and pipeline projects to 2022 totals. **Figure 2** presents the locations of housing opportunity sites and pipeline projects and their overlay with the project TAZs.

Table 2 summarizes the units to be added to each project TAZ. All other TAZ land use inputs for the 2040 scenario were either carried over from the standard scenario or recalculated as appropriate to reflect the updated number of housing units.

TABLE 1. RESIDENTIAL PERMITS SINCE 2018

	1556 MIRAMAR	1557 NORTH HMB	1558 SOUTH HMB
2018	1	1	11
2019	4	4	11
2020	1	1	23
2021	2	5	23
2022	2	3	18
TOTAL UNITS	10	14	86
MFU ^a	1	1	9
SFU ^b	9	13	77

^a Multi-Family Units are estimated to be 10% of total units.

^b Single Family Units are estimated to be 90% of total units.

TABLE 2. RESIDENTIAL UNITS OF HOUSING OPPORTUNITY SITES AND PIPELINE PROJECTS

		1556 MIRAMAR	1557 NORTH HMB	1558 SOUTH HMB
HOUSING OPPORTUNITY SITES	SFU	0	44	0
	MFU	0		284
	ADUs	14	28	70
PIPELINE PROJECT	SFU	2	5	25
	MFU	0	202	108
TOTAL		16	279	487

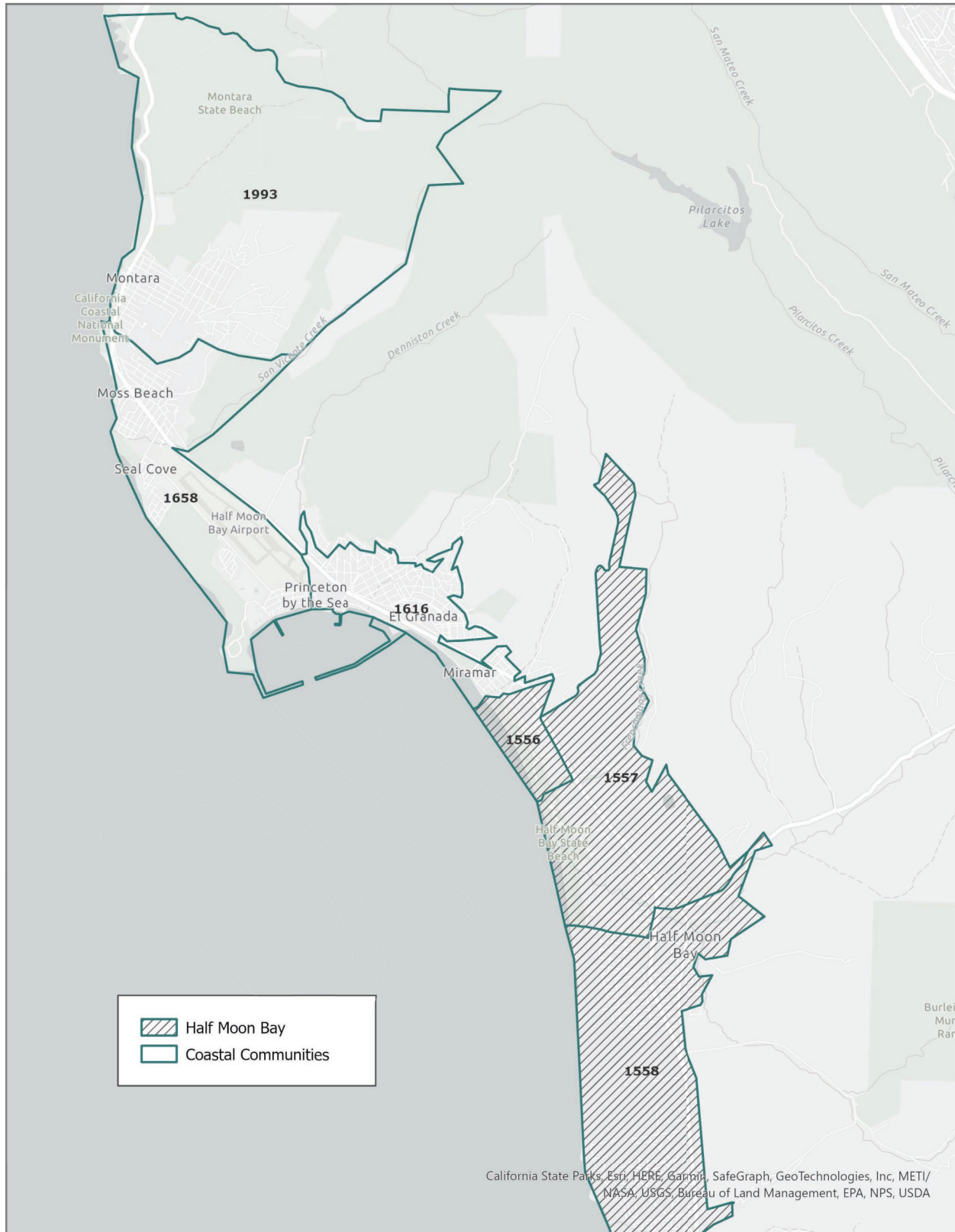


FIGURE 1. TRANSPORTATION ANALYSIS ZONES

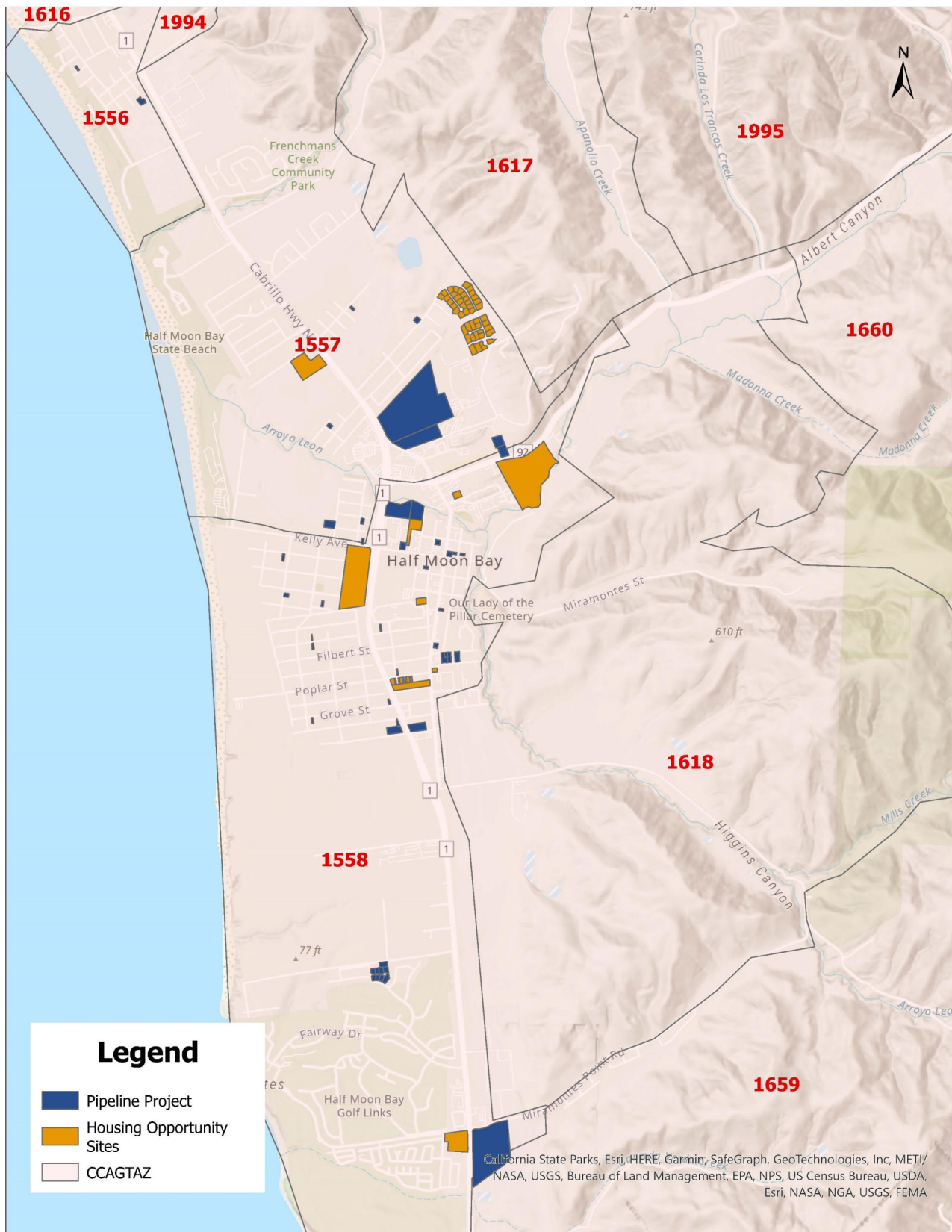


FIGURE 2. LOCATIONS OF HOUSING OPPORTUNITY SITES AND PIPELINE PROJECTS

VMT CALCULATIONS

A script received from Santa Clara VTA was used to tabulate Bay Area resident generated VMT by TAZ. The calculation steps are briefly outlined below:

- The script takes as inputs daily person trip tables produced by the mode choice step of the VTA model for all home-based trip purpose. Non-home-based trips are not included.
- VMT is calculated by multiplying the auto trip equivalent of the person trips (considering vehicle occupancy) by the appropriate travel distance for each TAZ pair, resulting in VMT matrices for home-based trips and home-based work trips.
- Row and column sums from the VMT matrices are written to a table.
- VMT per capita can be calculated as the total VMT at the production (home) TAZ divided by the population of that zone.
- VMT per employee is calculated as the total home-based work VMT at the attraction (work) location divided by the total employment of that zone.

Final calculations and summary statistics for different geographies are prepared by importing the table of VMT by TAZ to an Excel spreadsheet for final processing.

BASELINE AND THRESHOLD OF SIGNIFICANCE

Baseline VMT metrics were calculated using the 2022 scenario, as shown in **Table 3**. The transportation and economic environments of the coastal communities in San Mateo County are markedly different from those on the San Francisco Bay side. For this reason, a VMT baseline representative of the coastal communities was selected as the appropriate baseline for analysis. The coastal communities include Montara, Moss Beach, El Granada and Half Moon Bay, as depicted in Figure 1. The applicable threshold of significance is based on 85% of the baseline VMT per capita in the coastal communities.

TABLE 3: BASELINE VMT PER CAPITA– YEAR 2022

GEOGRAPHY	HOME BASED VMT ^a	POPULATION	BASELINE VMT PER CAPITA	85% OF BASELINE VMT PER CAPITA
NINE COUNTY BAY AREA	109,828,741	7,574,265	14.5	12.33
SAN MATEO COUNTY	10,049,128	766,522	13.11	11.14
COASTAL COMMUNITIES	557,598	23,739	23.49	19.97
CITY OF HALF MOON BAY	266,731	12,972	20.56	17.48

^a VMT at trip production location.

Source: DKS Associates, VTA-C/CAG Travel Demand Model.

FINDINGS

With the pipeline and opportunity site residential projects in place, the VMT per capita for Half Moon Bay will fall to 18.6 by 2040, below the threshold of significance, as shown in **Table 4**.

While the modeled result supports a finding of less than significant VMT impact for the Housing Element, several residential projects have characteristics that are likely to result in even lower VMT. These include projects that will serve low-income agricultural workers, affordable and senior housing units, and affordable units for Cabrillo Unified School District teachers and staff. These 197 units will exhibit lower than typical VMT due to their proximity to the occupants' workplaces, the reduced vehicle trip making associated with lower income residents and seniors, and/or location within the Town Center planning area (proximity to shopping and services). The type and location of these units further supports the finding of a less than significant VMT impact.

TABLE 4: HALF MOON BAY VMT PER CAPITA WITH HOUSING ELEMENT UPDATE– YEAR 2040

GEOGRAPHY	HOME BASED VMT ^a	POPULATION	VMT PER CAPITA
CITY OF HALF MOON BAY	283,742	15,271	18.58

^a VMT at trip production location.

Source: DKS Associates, VTA-C/CAG Travel Demand Model.