

TECHNICAL MEMORANDUM

To: Todd Seeley
City of Half Moon Bay
Department of Public Works
501 Main Street
Half Moon Bay, California 94019

From: Juliet Bolding, Associate Planner
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Date: May 11, 2026

Re: **Fence Extension Memorandum for the Safeway Fencing Project, Half Moon Bay, San Mateo County, California / SWCA Project No. 71765**

INTRODUCTION

The City of Half Moon Bay (City) is proposing to construct the Safeway Fencing Project (project), which involves the installation of fencing along a portion of the edge of the riparian corridor associated with Pilarcitos Creek in the city of Half Moon Bay, San Mateo County, California. The project is located between the Strawflower Shopping Center (at the junction of Highways 1 and 92) and Pilarcitos Creek in Half Moon Bay, within the westernmost portion of San Mateo County (Assessor's Parcel Numbers [APNs] 056-300-150, 056-300-140, and 056-300-230) (Figure 1). The originally proposed project (project) would replace an existing dilapidated fence and extend approximately 1,000 feet from the intersection of the Safeway parking lot in Strawflower Shopping Center and 345 Belleville Boulevard, south and east to approximately the junction with the Oak Avenue Bridge (see Figure 1). The City of Half Moon Bay (City) determined that the project was categorically exempt from CEQA under a Class 1 Exemption.¹

The project was approved by the Half Moon Bay Planning Commission on February 10, 2026. During that hearing, the Planning Commission raised concerns about the amount of human access and activity in the riparian zone northwest of the shopping center and expressed a desire to extend the fence further to protect more of the riparian zone. For this reason, the Planning Commission requested that the fence be extended beyond the initial area, from the northwest corner of the Safeway lot, through the southwestern edge of the property at 345 Belleville Boulevard, to the City's right-of-way (ROW) on Belleville Boulevard.

¹ The CEQA Class 1 exemption (14 California Code of Regulations Section 15301) applies to the operation, repair, maintenance, or minor alteration of existing public or private structures and facilities, provided the project involves "negligible or no expansion of an existing use."

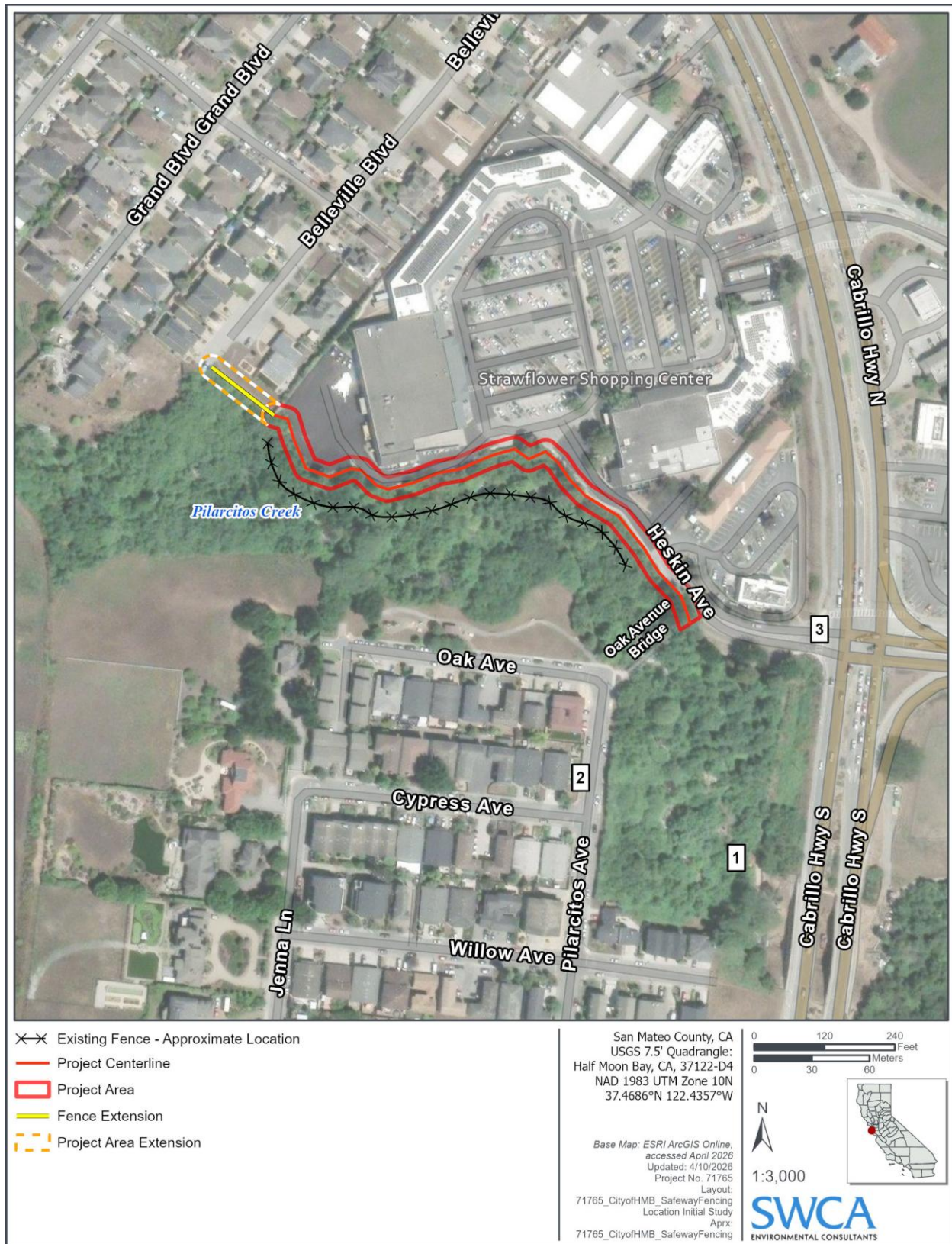


Figure 1. Project vicinity map with project extension.

The Planning Commission approved the project with the condition that Public Works staff “proactively explore opportunities to lengthen the fence as much as possible on its west side.”² The Public Works Department has investigated the feasibility of extending the fence to Belleville Boulevard and deemed it feasible. The existing property owner at 345 Belleville Boulevard is in agreement with this change.

The purpose of this memo is to clarify that, like the originally proposed project, the revised project would also be exempt from CEQA and further would not result in any environmental impacts that were not discussed in the original Initial Study.³

REVISED PROJECT DESCRIPTION

The revised project would extend the fence for approximately 152 feet along the southwest side of 345 Belleville Boulevard (APN 056-058-350) to the City’s ROW on Belleville Boulevard (see Figure 1). The fence extension would be 8 feet high. There is an established informal walking path along the southwestern edge of 345 Belleville Boulevard that the neighborhood uses to reach the Strawflower Shopping Center. The fence would be placed west of the walking path, maintaining neighborhood access to the shopping center while limiting access to the Pilarcitos Creek riparian vegetation to the west and south (Figure 2).

Construction of the fence extension would require approximately 19 additional fence posts. As with the original project, the fence would be placed within 5 feet of the existing walking path so as to disturb as little riparian vegetation as possible during construction (see Figure 2). Changes from the original project related to the project extension are shown in Table 1.

Table 1. Original Project and Proposed Extension (Revised Project)

Attribute	Original Project	Project Extension	Total
APNs	056-300-150, 056-300-140, 056-300-230	056-058-350	N/A
Length (feet)	1,000 feet	152 feet	1,152 feet
Number of fence posts	101	19	120
Footprint (10-inch round concrete footings)	265 square feet/ 0.006 acre	50 square feet/ 0.001 acre	315 square feet/ 0.007 acre
Excavation (10-inch x 36-inch holes)	171.7 cubic feet	32.3 cubic feet	204 cubic feet
Construction duration	6 to 8 weeks	None	6 to 8 weeks

CATEGORICAL EXEMPTION

The Planning Commission approved the Class 1 Categorical Exemption for the project at the February 10, 2026, hearing. As discussed in Section 2.1.1 of the Initial Study checklist that was prepared to support the Class 1 Existing Facilities exemption, the project is characterized as consisting of “the operation, repair, maintenance, permitting, leasing, licensing, or minor alteration of existing public or private structures, facilities, mechanical equipment, or topographical features, involving negligible or no expansion of existing or former use.” The key consideration is whether the project involved negligible or no expansion of use. Section 15301(e)(1) includes additions to existing structures, provided the addition will not result in an increase of more than 2,500 square feet.

² Half Moon Bay Planning Commission. February 10, 2026. Planning Commission Meeting. Available at: <https://www.halfmoonbay.gov/150/Planning-Commission-Meeting-Agendas>. Accessed May 11, 2026.

³ SWCA Environmental Consultants (SWCA). 2025. *Initial Study to Support the Conclusion of a Categorical Exemption Under Class 1 for the Safeway Fencing Project, Half Moon Bay, San Mateo County, California*. Half Moon Bay, California: SWCA Environmental Consultants. August.



Figure 2. Western edge of 345 Belleville Boulevard showing walking path and riparian vegetation.

The revised project includes an extension of approximately 152 feet, about 15.2% longer than the original length, which would extend protection of the riparian corridor for a relatively short distance beyond the shopping center. The new fence would be approximately 1,152 feet long and a few inches wide; therefore, the new fence with the extension would not result in an overall increase of more than 2,500 square feet compared to the existing fence and would be a negligible expansion of the existing use. The extension is consistent with the required conditions for a Class I exemption; it would not have cumulative impacts, it would not have a significant effect due to unusual circumstances, it is not visible from a scenic highway, it is not on a hazardous waste site, and it would not cause substantial adverse change to an historical resource. Therefore, the Class 1 Exemption is still applicable to the entire project, including the extension.

IMPACT ANALYSIS

The fence extension would not result in any impacts not already analyzed in the Initial Study checklist prepared as supporting material for the Class 1 Categorical Exemption and would not increase the significance of any impact as analyzed in the Initial Study. CEQA impact areas are summarized below.

Impact Areas

Aesthetics

Impacts to Aesthetics for the original project are discussed in Section 3.1, *Aesthetics*, of the Initial Study. Similar to the original project, the proposed fence extension would interrupt some views of riparian vegetation but is located in an urban area adjacent to roads and residences. It is not visible from Highway 1, would not substantially degrade the existing visual character of the area, and would not have an adverse effect on a scenic vista. Therefore, impacts related to the proposed fence extension would remain either no impact or less than significant.

Agriculture and Forest Resources

As discussed in Section 3.2, *Agriculture and Forest Resources*, of the Initial Study, the original project is not zoned for agriculture or forest uses. Similarly, the proposed fence extension would cross a residential lot that is not zoned for agriculture or timber. Therefore, it would have no impact on agricultural or forest resources.

Air Quality

Air Quality impacts from the original project are discussed in Section 3.3, *Air Quality*, of the Initial Study. Fence construction for the original project would disturb less than 0.25 acre of land. With the addition of the proposed fence extension, construction would still disturb less than 0.25 acre of land. The total project remains relatively small and falls under the screening threshold for generating significant construction emissions.⁴ The fence extension would incorporate air quality Avoidance and Minimization Measures (AMMs) as defined in Section 1.5.1, *Avoidance and Minimization Measures, Air Quality* of the Initial Study. Therefore, the revised project's impacts related to air quality would remain either no impact or less than significant.

Biological Resources

A biological field survey was performed for the original project that covered the area of the proposed fence extension (see Appendix A to the Initial Study) and impacts are discussed in Section 3.4, *Biological Resources*, of the Initial Study. The fence extension would be constructed between Pilarcitos Creek riparian vegetation which is mapped as arroyo willow thickets (*Salix lasiolepis*) and a residential lot. The arroyo willow vegetation was analyzed in the Initial Study for the original project. The fence extension would be constructed within 5 feet of the existing walking path and would minimize disturbance of riparian vegetation. It would include the biological resources AMMs defined in Section 1.5.2, *Avoidance and Minimization Measures, Biological Resources* of the Initial Study. Therefore, the revised project's impacts related to biological resources would be similar to those identified in the Initial Study and would remain either no impact or less than significant.

⁴ Bay Area Air Quality Management District (BAAQMD). 2022. Chapter 5: Project-Level Air Quality Impacts. In *California Environmental Quality Act Air Quality Guidelines*. Available at: https://www.baaqmd.gov/~media/files/planning-and-research/ceqa/ceqa-guidelines-2022/ceqa-guidelines-chapter-5-project-air-quality-impacts_final-pdf.pdf?rev=de582fe349e545989239cbbc0d62c37a&sc_lang=en. Accessed April 1, 2026.

Cultural Resources

The *Cultural Resources Investigation for the Safeway Fencing Project, Half Moon Bay, San Mateo County, California*⁵ was prepared in September 2023. It included a records survey and intensive archaeological field survey and is discussed in Section 3.5, *Cultural Resources*, of the Initial Study. The records search and field survey area included the area of the proposed fence extension. No historic or prehistoric cultural resources were observed within the extended project area. The fence extension would include the cultural resources AMMs for previously unknown cultural resources defined in Section 1.5.3, *Avoidance and Minimization Measures, Cultural Resources* of the Initial Study. Therefore, the revised project's impacts related to cultural resources would be similar to those identified in the Initial Study and would remain either no impact or less than significant.

Energy

Impacts related to energy use are discussed in Section 3.6, *Energy*, of the Initial Study. As discussed in the Initial Study, energy use during project construction would be short-term and temporary, and the fence would not use energy during operation. Construction of the fence extension would include the AMMs for greenhouse gases (GHGs) identified in Section 1.5.4, *Avoidance and Minimization Measures, Greenhouse Gases* of the Initial Study to reduce construction-related emissions, which would also improve energy efficiency. Therefore, energy impacts related to the proposed fence extension would remain either no impact or less than significant.

Geology and Soils

Impacts related to geology and soils are discussed in Section 3.7, *Geology and Soils*, of the Initial Study. As with the original project, the fence extension is in a seismic liquefaction zone but is not in a fault rupture or landslide zone; therefore, impacts related to seismic hazards would be the same as those identified in Section 3.7 of the Initial Study.⁶ The extension would add approximately 19 fence posts for a total of approximately 120 fence posts. Approximately 1.7 cubic feet of soil would be excavated for each fence post, resulting in additional excavation of approximately 32.3 cubic feet and a total excavation of 204 cubic feet of soil. The overall total, including the extension, would cover a relatively small footprint (approximately 314 square feet) in and adjacent to an area covered by riparian vegetation, and all exposed areas would either be stabilized or revegetated with native species prior to the end of construction. Therefore, the revised project's impacts would be minimal related to soil excavation and erosion, and impacts related to excavation of soils would remain either no impact or less than significant.

Greenhouse Gases

As discussed in Section 3.8, *Greenhouse Gases*, of the Initial Study, the Bay Area Air District (BAAD) has established screening thresholds for construction-related GHG emissions for parks at 10 acres. The overall total project, including the extension, is relatively small compared to the screening criteria and would include the GHG AMMs recommended by the Bay Area Air Quality Management District (BAAQMD; now BAAD) 2022 CEQA Guidelines⁷ and defined in Section 1.5.4, *Avoidance and Minimization Measures, Greenhouse Gases* of the Initial Study. With implementation of the best

⁵ SWCA. 2023. *Cultural Resources Investigation for the Safeway Fencing Project, Half Moon Bay, San Mateo County, California*. Prepared for City of Half Moon Bay. Half Moon Bay, California: SWCA Environmental Consultants. September 15.

⁶ California Geological Survey. 2021. Earthquake Zones of Required Investigation. Available at: https://maps.conservation.ca.gov/cgs/informationwarehouse/eqzapp/#data_s=id%3AdataSource_4-191d8e4b825-layer-21%3A1773. Accessed April 2, 2026.

⁷ BAAQMD. 2022. *California Environmental Quality Act Air Quality Guidelines*. Available at: <https://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa/updated-ceqa-guidelines>. Accessed April 2, 2026.

management practices as discussed in the Initial Study, construction-related GHG emissions under the revised project would be less than significant.

Hazards and Hazardous Materials

As discussed in Section 3.9, *Hazards and Hazardous Materials*, of the Initial Study, construction of the project would involve the transport, use, and disposal of small amounts of potentially hazardous materials. The revised project would minimally expand the transport, use and disposal of these potentially hazardous materials. As with the original project, these temporary construction activities involving the use, transport, storage, and disposal of hazardous materials would be conducted in compliance with all health and safety requirements, such as County and City General Plan policies, California Code of Regulations (CCR) Sections 337 through 340, Chapter 6.95 of California Health and Safety Code Article 1, and CCR Title 19, Public Safety, Division 2; therefore the revised project's impacts related to hazardous materials use would be less than significant.

The fence extension is not located on a hazardous materials site, within an airport land use plan, or within 2 miles of a public airport.^{8,9} The fence extension would be accessed from the Safeway parking lot behind the Safeway store and from the end of Belleville Boulevard; therefore, it would also not interfere with an emergency response plan. Similar to the original project, the extension is in a Moderate Fire Hazard Severity Zone in a Local Responsibility Area and would not increase the risk of wildland fire. Impacts related to these issues would be the same as under the original project and would remain either no impact or less than significant.

Hydrology and Water Quality

As discussed in Section 3.10, *Hydrology and Water Quality*, of the Initial Study, the original project would excavate a minimal amount of soil (approximately 172 cubic feet) and would have minimal ground disturbance (approximately 265 square feet) to install approximately 120 fence posts. The revised project would increase these numbers to approximately 204 cubic feet of soil excavation and 315 square feet of ground disturbance and would be required to implement an erosion/pollution control plan under the Municipal Regional Stormwater National Pollutant Discharge Elimination System (NPDES) Permit¹⁰ and San Mateo Countywide Water Pollution Prevention Program.¹¹ It would include the AMMs to protect hydrology and water quality from stormwater runoff during construction defined in Section 1.5.5, *Avoidance and Minimization Measures, Hydrology and Water Quality* of the Initial Study.

The revised project would not significantly increase impervious surface, alter the drainage patterns of the site, or change the rate or amount of surface runoff. As with the original project, the fence extension is not in a 100-year flood zone but is in a flood area related to dam failure.¹² Therefore, the revised project's impacts related to hydrology and water quality remain either no impact or less than significant.

⁸ State Water Resources Control Board. 2025. GeoTracker. Available at: <https://geotracker.waterboards.ca.gov/map/>. Accessed April 2, 2026.

⁹ California Department of Toxics Substances Control. 2018. EnviroStor. Available at: <https://www.envirostor.dtsc.ca.gov/public/map>. Accessed April 2, 2026.

¹⁰ San Francisco Regional Water Quality Control Board. 2022. *California Regional Water Quality Control Board San Francisco Bay Region Municipal Regional Stormwater NPDES Permit*. Order No. R2-2022-0018; NPDES Permit No. CAS612008. May 11. Available at: https://www.waterboards.ca.gov/sanfranciscobay/board_decisions/adopted_orders/2022/R2-2022-0018.pdf. Accessed April 3, 2026.

¹¹ County of San Mateo. 2026. Flows to Bay, San Mateo Countywide Water Pollution Prevention Program: Construction Best Practices. Available at: <https://www.flowstobay.org/construction>. Accessed April 3, 2026.

¹² County of San Mateo. 2024. Multijurisdictional Local Hazard Mitigation Plan Resources: San Mateo County Hazard Mapping Tool. Available at: <https://www.smcgov.org/ceo/multijurisdictional-local-hazard-mitigation-plan-resources>. Accessed April 3, 2026.

Land Use and Planning

As discussed in Section 3.11, *Land Use and Planning*, of the Initial Study, the project would replace a fence intended to protect part of the riparian vegetation surrounding Pilarcitos Creek. Similarly, the proposed fence extension would not divide an existing community or conflict with any land use plan, policy, or regulation and impacts would remain either no impact or less than significant.

Mineral Resources

As discussed in Section 3.12, *Mineral Resources*, of the Initial Study, the original fence is not in an area used or available for extraction of mineral resources and is not in an area identified as containing mineral deposits of statewide or regional significance. The revised project is also not in an area identified as containing mineral deposits of statewide or regional significance. Therefore, the revised project's impacts related to mineral resources would remain no impact.

Noise

Noise generated during construction of the fence extension would be the same as that discussed in Section 3.13, *Noise*, of the Initial Study. As discussed in the Initial Study, the nearest sensitive receptor would be the residence at 345 Belleville Boulevard, approximately 45 feet northeast of the fence and fence extension. The fence extension would also be constructed approximately 45 feet from the residence at 345 Belleville Boulevard and include the noise-related AMMs defined in Section 1.5.6, *Avoidance and Minimization Measures, Noise* of the Initial Study. Therefore, the revised project's impacts related to noise and vibration would remain either no impact or less than significant.

Population and Housing

As discussed in Section 3.14, *Population and Housing*, of the Initial Study, the fence would replace an existing fence and would neither induce unplanned population growth nor displace substantial numbers of people. The proposed extension would increase protection for the riparian corridor south of the Strawflower Shopping Center and west of the Highway 1 underpass, thereby protecting sensitive habitat. There are not substantial numbers of people currently living in this area; therefore, as with the originally proposed project, the proposed expansion would not result in the displacement of substantial numbers of people or housing, necessitating the construction of replacement housing elsewhere. Impacts to population and housing would remain either no impact or less than significant.

Public Services

As discussed in Section 3.15, *Public Services*, of the Initial Study, the project would have no impact on fire protection services, police protection services, schools, parks or library services. As with the original fence, the fence extension would also not increase the population in the area or the demand for public services and no impact to public services would occur.

Recreation

As discussed in Section 3.16, *Recreation*, of the Initial Study, the project does not include recreational facilities or increase the demand for recreational facilities. The revised project would not change the impact conclusions in the Initial Study and no impact would occur.

Transportation

Section 3.17, *Transportation*, of the Initial Study identifies less than significant impacts related to construction traffic, bicycle and pedestrian traffic on Oak Avenue Bridge and the shopping center sidewalks, and emergency access. The fence extension would be adjacent to the end of Belleville Boulevard and a neighborhood walking trail. Similar to the original project, construction of the fence extension may have short-term, temporary closures to the neighborhood walking trail. As discussed in Section 3.17, *Transportation*, the project would be required to create a traffic control plan that would ensure pedestrian and bicycle safety during construction; therefore, construction impacts would be less than significant. Since the fence would end at the cul-de-sac of Belleville Boulevard, construction would not impede emergency access, and the fence extension would provide emergency access as required by the Coastside Fire Protection District via gates with Knox padlocks. Therefore, the revised project's impacts to emergency services and traffic, bicycle and pedestrian traffic during construction would remain less than significant, and all other transportation impacts would remain no impact.

Tribal Cultural Resources

As the project is exempt from CEQA, the project is also exempt from the formal Assembly Bill (AB) 52 process. As discussed in Section 3.18, *Tribal Cultural Resources*, of the Initial Study, Tribal representatives known to have connections to the region were notified and no requests for consultation or comments on the project from the Tribal representatives were received. As with the original project, compliance with the AMMs identified in Section 1.5.2 and Section 1.5.3 of the Initial Study would ensure the fence extension does not cause a substantial adverse change in the significance of a tribal cultural resource, and impacts to tribal cultural resources remain less than significant.

Utilities and Service Systems

As described in Section 3.19, *Utilities and Service Systems*, of the Initial Study, construction activities would require a minimal and temporary amount of water for dust control and cement mixing, would not produce wastewater or solid waste, and would not require gas or electric facilities. The project including the proposed fence extension would create approximately 314 square feet of new impervious surface from 120 new fence posts and would not impact stormwater systems. As the proponent, the City would be required to comply with all federal, state, and local ordinances for water, energy, and waste reduction and management; and the addition of the fence extension would not change impact levels as described in the Initial Study. Revised project's impacts to utilities and service systems would remain no impact or less than significant.

Wildfire

As described in Section 3.20, *Wildfire*, of the Initial Study, the project would replace an existing fence and would not exacerbate wildfire risks, expose people or structures to wildfire risks associated with post-fire downstream flooding or landslides, or impair an adopted emergency response plan. As with the original project, the proposed fence extension would include gates with Knox padlocks as required by the Coastside Fire Protection District for emergency access. The fence extension would have similar impacts to the original project and would not change impact conclusions discussed in the Initial Study. The revised project's impacts related to wildfire would remain no impact.

Mandatory Findings of Significance

As discussed in Section 3.21, *Mandatory Findings of Significance*, of the Initial Study, the original project would not have the potential to substantially degrade the quality of the environment, does not have impacts that are cumulatively considerable, and would not cause substantial adverse effects on human beings, either directly or indirectly. The fence extension adds approximately 152 feet to the fence length and would have similar impacts to the original project. Therefore, impacts related to the fence extension would remain the same and no impacts to mandatory findings of significance would occur.

SUMMARY AND CONCLUSIONS

The fence extension was requested by the Planning Commission at the February 10, 2026, meeting at which they also approved the project with the Categorical Exemption. The project with the extension replaces an existing dilapidated fence and extends approximately 1,152 feet from the end of Belleville Boulevard at 345 Belleville Boulevard, south and east to approximately the junction with the Oak Avenue Bridge (see Figure 1). The extension of the fence to Belleville Boulevard would add approximately 152 feet or 15.2 percent to the total original length. As has been shown above, the addition of the fence extension does not add any new impacts to the project or alter any of the impact conclusions in the initial Study. Overall, the extension remains eligible for a Class 1 Categorical Exemption under CEQA as discussed above.