

Memorandum

Subject: Granada Community Park and Recreation Center Project
Initial Study/Mitigated Negative Declaration (SCH No. 2024050693)
Consideration of Comments Received during the Public Review Period

Date: September 26, 2024

To: Chuck Duffy, Granada Community Services District
Hope Atmore, Granada Community Services District

From: Ken Schwarz, Montrose Environmental
Jessica Gonzales, Montrose Environmental

INTRODUCTION

This memorandum has been prepared to summarize the comments received by the Granada Community Services District (GCSD or District) on the Initial Study/Mitigated Negative Declaration (IS/MND) for the Granada Community Park and Recreation Center (Proposed Project or Project). An IS/MND is an informational document prepared by a Lead Agency, in this case, GCSD, that provides environmental analysis for public review. The IS/MND analyzed the impacts resulting from the Proposed Project and, where applicable, identified mitigation measures to minimize the impacts to less-than-significant levels.

This memorandum first summarizes the public review process undertaken for the IS/MND and identifies the next steps in the California Environmental Quality Act (CEQA) process, and then summarizes the comments received and provides responses to those comments. However, it should be noted that CEQA does not require GCSD to prepare responses to comments on the IS/MND. (Pub. Resources Code §21091(d), (f); 14 Cal. Code Regs. §15074(b)).

CEQA PROCESS

In accordance with Section 15073 of the State CEQA Guidelines, GCSD submitted the IS/MND to the State Clearinghouse for a 30-day public review period starting May 15, 2024. In addition, GCSD circulated a Notice of Intent (NOI) to Adopt the IS/MND to interested agencies and individuals and filed the NOI with the San Mateo County Clerk. The public review period ended on June 17, 2024 and was informally extended to July 19, 2024. It should be noted that some public comments were provided after the public comment period ended; however, they were still considered in this memorandum. A list of the comment letters received are included in Table 1.

In accordance with State CEQA Guidelines Section 15074(b), GCSD must consider the IS/MND together with comments received during the public review process prior to adopting the IS/MND. While CEQA does not require the preparation of responses to comments for negative declarations, this

memorandum has been prepared to document that the comments received do not affect the IS/MND’s conclusions that the Proposed Project would not have any significant effects on the environment.

Table 1. Comment Letters Received on the IS/MND

Comment Letter	Commenter	Affiliation	Date Sent
1	Kevin Lafontaine	Resident	May 19, 2024
2	Linnea Vilen	Resident	May 19, 2024
3	Lisa Ketcham	Resident	May 20, 2024
4	Denise Anderson	Resident	May 30, 2024
5	Nancy Marsh	Resident	June 5, 2024
6a	Michael McCreary	Resident	June 5, 2024
6b	Michael McCreary	Resident	June 6, 2024
7	Justine Lange	Resident	June 5, 2024
8	Cindy Vargas	Resident	June 6, 2024
10	Deborah Briscoe	Resident	June 6, 2024
11a	Melanie Dobbs	Resident	June 6, 2024
11b	Melanie Dobbs	Resident	June 18, 2024
12a	Cecelia Baloian	Resident	June 9, 2024
12b	Cecelia Baloian	Resident	June 9, 2024
13	Elizabeth Marstall	Resident	June 7, 2024
14	Sandy Kelly	Resident	June 9, 2024
15	Karen Yorke	Resident	June 9, 2024
16	David Moore	Resident	June 9, 2024
17	Sammy Rivers	Resident	June 9, 2024
18	Natalie Mutz	Resident	June 9, 2024
19	Laurel Kupec	Resident	June 10, 2024
20	Meg Henry	Resident	June 10, 2024
21	Michelle Cleave	Resident	June 10, 2024
22	Lisa Longaker	Resident	June 11, 2024
23	Hayley Kupec	Resident	June 10, 2024

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Comment Letter	Commenter	Affiliation	Date Sent
24	Ian Stone	Resident	June 11, 2024
25	Catrine Brown	Resident	June 11, 2024
26	Emily Henry	Resident	June 11, 2024
27	Kenji Gjovig	Resident	June 11, 2024
28	Lindsay Willman	Resident	June 11, 2024
29	Krista Enos	Resident	June 11, 2024
30	Danielle Mihalkanin	Resident	June 11, 2024
31	Lisa Longaker	Resident	June 11, 2024
32	Marc Richman	Resident	June 11, 2024
33	Autumn Ross	Resident	June 12, 2024
34	Candice Wecksler	Resident	June 12, 2024
35	Joanna Saxby	Resident	June 13, 2024
36	James Hudon	Resident	June 13, 2024
37	Kristy Yeh	Resident	June 13, 2024
38a	Amanda Bachelor	Resident	June 13, 2024
38b	Amanda Bachelor	Resident	June 15, 2024
39a	Corinna Liebowitz	Resident	June 14, 2024
39b	Corinna Liebowitz	Resident	June 14, 2024
40	Rachel Restani	Resident	June 14, 2024
41	Genevieve Haight	Resident	June 14, 2024
42	Gabriella Orona Bateman	Resident	June 14, 2024
43a	Marc Strohlein	Resident	June 10, 2024
43b	Marc Strohlein	Resident	June 15, 2024
44a	Janet Brayer	Resident	June 10, 2024
44b	Janet Brayer	Resident	June 17, 2024
44c	Janet Brayer	Resident	undated
45	Amelia Fuertes Rodriguez	Resident	June 10, 2024
46	Bethany Berkowitz	Resident	June 14, 2024

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Comment Letter	Commenter	Affiliation	Date Sent
47	Robert R. Rathborne	Resident	June 15, 2024
48	Adam Katcher	Resident	June 15, 2024
49	Eric Suchomel	Resident	June 16, 2024
50	Gus Mattammal, Chair	Midcoast Community Council	June 12, 2024
51	P. Shue	Resident	June 16, 2024
52	Kerri Gardner	Resident	June 16, 2024
53	Jill Grant	Resident	Undated
54	Chris Mickelsen	Resident	June 17, 2024
55	Helene Campagnet	Resident	June 17, 2024
56	Denise Anderson	Resident	June 17, 2024
57a	GianCarlo & Sherrie Lynn Hnatt	Resident	June 15, 2024
57b	GianCarlo & Sherrie Lynn Hnatt	Resident	June 17, 2024
58	Robert R. Rathborne	Resident	June 15, 2024
59	Leni Schultz	Resident	Undated
60	Kate Broderick	Coastside Families Taking Action	June 17, 2024
61	Yungsheng Luo	California Department of Transportation (Caltrans)	June 17, 2024
62	Tom Mattusch	Resident	June 17, 2024
63	Alissa Teige	Resident	June 17, 2024
64	Dan Haggerty	Resident	June 17, 2024
65	Stephen Pohlmeier	Resident	June 17, 2024
66	Lucas Flosi	Resident	June 17, 2024
67a	Chris Rogers	Resident	June 17, 2024
67b	Chris Rogers	Resident	June 19, 2024
68	Meredith Schreiber	Resident	June 17, 2024
69	Tahsa Sturgis	San Francisco Bay Regional Water Quality Control Board	June 17, 2024

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Comment Letter	Commenter	Affiliation	Date Sent
70	Michal Abaonza	Resident	June 17, 2024
71	Isobel Cooper	California Coastal Commission	June 21, 2024
72	Jocelyn	Resident	June 21, 2024
73	Dan Code	Resident	Undated
74	Nicole Burleson	Resident	July 6, 2024
75	Thad Baker	Resident	July 6, 2024
76	Justine Cable	Resident	July 6, 2024
77	Evelyn Moseley France	Resident	July 6, 2024
78	Jocelyn Sevilla	Resident	July 11, 2024
79	Jennifer Collins	Resident	July 9, 2024
80	Patrick Tierney	Resident	July 12, 2024
81	Richard Klein	Resident	July 13, 2024
82	Anita Marlin	Resident	July 13, 2024
83	Josh Simpson	Resident	July 14, 2024
84a	Harriet Segelcke	Resident	July 12, 2024
84b	Harriet Segelcke	Resident	July 20, 2024
85	Elizabeth Durham	Resident	June 11, 2024
86	Owen	Resident	July 21, 2024
87	Wanda Bowles	Resident	July 17, 2024
88	Michael Trudgeon	Resident	July 17, 2024
89	Mike Cochran	Resident	July 18, 2024
90	Steve Monowitz	San Mateo County Planning and Building	July 31, 2024

At the time that the IS/MND is considered for approval, GCSD will also consider adopting a Mitigation Monitoring and Reporting Program (MMRP) for the mitigation measures identified in the IS/MND. If GCSD approves the IS/MND, then within five working days following the IS/MND approval, GCSD must file a Notice of Determination (NOD) with the State Clearinghouse and the San Mateo County Clerk's office. A resolution approving the IS/MND and adopting the MMRP would confirm that the GCSD Board of Directors received and reviewed the IS/MND pursuant to the provisions of CEQA and would include the following findings:

1. Prior to taking action on the IS/MND and MMRP for the Proposed Project, GCSD read and considered the IS/MND, public comments, and the responses to comments included in this memorandum.
2. The IS/MND and MMRP are based on independent judgment exercised by GCSD.
3. The IS/MND and MMRP were prepared and considered in accordance with the requirements of CEQA.
4. Considering the record as whole, and with incorporation of the mitigation measures, there is no substantial evidence that the Proposed Project will have a significant effect on the environment.
5. GCSD's General Manager is the custodian of the records of the proceedings on which this decision is based. Records are located at the GCSD offices located at 504 Ave Alhambra 3rd Floor, El Granada, CA 94018.

The resolution would identify that based on the above findings, the Board would approve the IS/MND, adopt the MMRP, and direct staff to file the NOD.

COMMENTS RECEIVED ON THE IS/MND

GCSD received 90 comment letters on the IS/MND (Table 1). These letters are included with this memorandum as Attachment A.

Comment Letter 1 –

Comment 1-1: The comment expresses a desire to maintain the skateboard ramp onsite.

Response to Comment 1-1: The existing skateboard ramp would be relocated but would remain on site.

Comment Letter 2 –

Comment 2-1: The comment expresses opposition to the Proposed Project.

Response to Comment 2-1: Comment noted.

Comment Letter 3 –

Comment 3-1: The comment states that the Proposed Project is not subject to LCP policy 8.31 because it is within the Midcoast urban/rural boundary but is subject to LCP policy 8.32 Regulation of Scenic Corridors in Urban Areas.

Response to Comment 3-1: Only inconsistencies with applicable plans is required to be analyzed. No analysis is required if the project is consistent with relevant plans. (*Stop Syar Expansion v. County of Napa* (2021) 63 Cal.App.5th 444, 460; *The Highway 68 Coalition v. County of Monterey* (2017) 14 Cal.App.5th 883, 894.). Nevertheless, the Proposed Project is located within the Urban Rural Boundary of the Midcoast Land Use Plan, which is a line that separates urban areas and rural service centers from rural areas in the Coastal Zone. Because the Project site is located within this boundary, LCP policy 8.31, Regulation of Scenic Corridors in Rural Areas is not applicable to the Proposed Project. LCP policy 8.32, Regulation of Scenic Corridors in Urban Areas is applicable and

the Proposed Project is consistent with this policy. Edits to the IS/MND are presented in the Errata to the IS/MND section at the end of this memorandum.

Comment 3-2: The comment states that there is no mention of the future Midcoast Multi-Modal (Parallel) Trail segment between Coronado Street and Capistrano Road along the Burnham Strip. The comment notes that GCSO and San Mateo County should collaborate on the future alignment of this segment, where a shared multi-modal trail could provide connection from Obispo Road to the outer edge of the Caltrans right-of-way (ROW) to continue northward to Capistrano Road

Response to Comment 1-3: The Project site is not proposed to serve as an official continuation of the future Midcoast Multi-Modal (Parallel) Trail but the exclusion of referencing this potential future trail in Project Description does not preclude the potential development of this trail at the Project site in the future if such a project was proposed.

Comment Letter 4–

Comment 4-1: This comment requests a link to comment on the development of the Burnham Strip.

Response to Comment 4-1: This comment does not identify an inadequacy or inaccuracy in the IS/MND.

Comment Letter 5–

Comment 5-1: This comment provides typographical and grammatical errors within the IS/MND for GCSO's consideration.

Response to Comment 5-1: Edits to the IS/MND are presented in the Errata to the IS/MND section at the conclusion of this memorandum.

Comment Letter 6–

Comment 6-1: This comment describes the commenters use of the onsite unofficial parking lot and skate ramp and expresses concerns over the removal of the dirt parking lot.

Response to Comment 6-1: The informal dirt lot on the Project site is not an official lot. However, the Proposed Project would provide official parking onsite and along Obispo Road. Although the skate ramp would be relocated, it would be maintained onsite.

Comment Letter 7–

Comment 7-1: This comment asks if the number of cars parked along the highway, the skate ramp, dirt parking lot and along Obispo Road were counted and states that the restriction of the use of the site for unofficial parking would result in people parking in residential areas.

Response to Comment 7-1: Refer to Response to Comment 71-1. The informal dirt lot on the Project site is not an official lot. However, the Proposed Project would provide official parking onsite and along Obispo Road.

Comment Letter 8–

Comment 8-1: This comment expresses a desire to retain the unofficial parking lot.

Response to Comment 8-1: The informal dirt lot on the Project site is not an official lot. However, the Proposed Project would provide official parking onsite and along Obispo Road.

Comment Letter 9–

Comment 9-1: This comment states that removal of the parking lot will require beachgoers park in residential areas.

Response to Comment 9-1: The informal dirt lot on the Project site is not an official lot. However, the Proposed Project would provide official parking onsite and along Obispo Road.

Comment Letter 10–

Comment 10-1: This comment requests that the Proposed Project provide the same amount of parking and states that beachgoers will park in residential areas.

Response to Comment 10-1: Refer to Response to Comment 71-1. The Proposed Project site does not currently provide sanctioned or official parking.

Comment Letter 11a–

Comment 11a-1: This comment requests information regarding parking at the Jetty.

Response to Comment 11a-1: This comment does not identify an inadequacy or inaccuracy in the IS/MND.

Comment Letter 11b–

Comment 11b-1: This comment responds to a clarifying statement regarding two separate projects and expresses concern regarding parking in the residential area.

Response to Comment 11b-1: Refer to Response to Comment 71-1. The Proposed Project site does not currently provide sanctioned or official parking.

Comment Letter 12a–

Comment 12a-1: This comment states that the Project will result in increased traffic in the neighborhood and expresses disapproval of the Proposed Project.

Response to Comment 12a-1: As described in Section 3.17, *Transportation* of the IS/MND, traffic is anticipated to increase during construction activities; however, this increase would be temporary and would be minimized through the implementation of a Construction Traffic Management Plan as described in Mitigation Measures TR-1, which would limit conflicts between construction traffic and local traffic, implement signage for alternative routes, provide flaggers or temporary traffic control to minimize disruptions, and document and repair any damage to roads by construction equipment. In the long-term, the park would serve the local residents and community of El Granada and would not create a substantial number of new trips from new, regional recreational users. Based on visitor counts from the nearby Quarry Park, it is assumed that the Proposed Project would generate a similar number of trips per day (approximately 90 trips) which would be below the Office of Planning and Research (OPR) threshold of 110 trips per day and compliant with SB 743, CEQA

Guidelines Section 15064.3 which establishes vehicle miles traveled (VMT) as the appropriate measure of transportation impacts.

Comment Letter 12b–

Comment 12b-1: This comment states that there have not been public meetings on the Project and questions the funding source.

Response to Comment 12b-1: GCSD has conducted public outreach for the Project. Funding is not a CEQA issue and is therefore not discussed in the IS/MND.

Comment Letter 13–

Comment 13-1: This comment states that the Project will negatively impact available parking.

Response to Comment 13-1: The Proposed Project includes parking that is compliant with regulations to support the proposed park and community recreation center. Official parking will be provided onsite and along Obispo Road. The informal dirt lot on the Project site is not an official lot.

Comment Letter 14–

Comment 14-1: This comment states that the Project will negatively impact available parking for the beach.

Response to Comment 14-1: The Proposed Project includes parking that is compliant with regulations to support the proposed park and community recreation center. Official parking will be provided onsite and along Obispo Road. The informal dirt lot on the Project site is not an official lot.

Comment Letter 15–

Comment 15-1: This comment states that the Project will negatively impact available parking for the beach.

Response to Comment 15-1: The Proposed Project includes parking that is compliant with regulations to support the proposed park and community recreation center. Official parking will be provided onsite and along Obispo Road. The informal dirt lot on the Project site is not an official lot.

Comment Letter 16–

Comment 16-1: This comment states that parking along Highway 1 is dangerous and states that a parking lot can be built on the east side of Highway 1.

Response to Comment 16-1: The comment does not identify an inadequacy or inaccuracy in the IS/MND.

Comment Letter 17–

Comment 17-1: This comment requests to see parking plans for Surfer's beach and expresses the importance of beach access parking.

Response to Comment 17-1: The Proposed Project includes parking that is compliant with regulations to support the proposed park and community recreation center. Official parking will be provided onsite and along Obispo Road. The informal dirt lot on the Project site is not an official lot.

Comment Letter 18–

Comment 18-1: This comment expresses concerns regarding the potential parking in residential areas and the effect on local businesses.

Response to Comment 18-1: The Proposed Project includes parking that is compliant with regulations to support the proposed park and community recreation center. Official parking will be provided onsite and along Obispo Road. The informal dirt lot on the Project site is not an official lot. The potential economic effect on local business is not a CEQA issue.

Comment Letter 19–

Comment 19-1: This comment expresses a desire to keep the preschool open.

Response to Comment 19-1: The preschool facility currently operates on an expiring lease agreement and would no longer be operating at the site regardless of the approval of the Proposed Project. The comment does not identify an inadequacy or inaccuracy in the IS/MND.

Comment Letter 20–

Comment 20-1: This comment expresses a desire to keep the preschool open.

Response to Comment 20-1: The preschool facility currently operates on an expiring lease agreement and would no longer be operating at the site regardless of the approval of the Proposed Project. The comment does not identify an inadequacy or inaccuracy in the IS/MND.

Comment Letter 21–

Comment 21-1: This comment expresses a desire to keep the preschool open.

Response to Comment 21-1: The preschool facility currently operates on an expiring lease agreement and would no longer be operating at the site regardless of the approval of the Proposed Project. The comment does not identify an inadequacy or inaccuracy in the IS/MND.

Comment Letter 22–

Comment 22-1: This comment expresses a concern regarding the lack of parking for beach access and suggests that the Project include parking.

Response to Comment 22-1: The Proposed Project includes parking that is compliant with regulations to support the proposed park and community recreation center. Official parking will be provided onsite and along Obispo Road. The informal dirt lot on the Project site is not an official lot.

Comment Letter 23–

Comment 23-1: This comment expresses a desire to keep the preschool open.

Response to Comment 23-1: The preschool facility currently operates on an expiring lease agreement and would no longer be operating at the site regardless of the approval of the proposed project. The comment does not identify an inadequacy or inaccuracy in the IS/MND.

Comment Letter 24–

Comment 24-1: This comment expresses a desire to keep the preschool open.

Response to Comment 24-1: The preschool facility currently operates on an expiring lease agreement and would no longer be operating at the site regardless of the approval of the Proposed Project. The comment does not identify an inadequacy or inaccuracy in the IS/MND.

Comment Letter 25–

Comment 25-1: This comment expresses a desire to keep the preschool open.

Response to Comment 25-1: The preschool facility currently operates on an expiring lease agreement and would no longer be operating at the site regardless of the approval of the Proposed Project. The comment does not identify an inadequacy or inaccuracy in the IS/MND.

Comment Letter 25–

Comment 25-1: This comment expresses a desire to keep the preschool open.

Response to Comment 25-1: The preschool facility currently operates on an expiring lease agreement and would no longer be operating at the site regardless of the approval of the Proposed Project. The comment does not identify an inadequacy or inaccuracy in the IS/MND.

Comment Letter 26–

Comment 26-1: This comment expresses a desire to keep the preschool open.

Response to Comment 26-1: The preschool facility currently operates on an expiring lease agreement and would no longer be operating at the site regardless of the approval of the Proposed Project. The comment does not identify an inadequacy or inaccuracy in the IS/MND.

Comment Letter 27–

Comment 27-1: No comment included.

Response to Comment 27-1: The comment does not identify an inadequacy or inaccuracy in the IS/MND.

Comment Letter 28–

Comment 28-1: This comment expresses a desire to keep the preschool open.

Response to Comment 28-1: The preschool facility currently operates on an expiring lease agreement and would no longer be operating at the site regardless of the approval of the Proposed Project. The comment does not identify an inadequacy or inaccuracy in the IS/MND.

Comment Letter 29–

Comment 29-1: This comment expresses a desire to keep the preschool open.

Response to Comment 29-1: The preschool facility currently operates on an expiring lease agreement and would no longer be operating at the site regardless of the approval of the Proposed Project. The comment does not identify an inadequacy or inaccuracy in the IS/MND.

Comment Letter 30–

Comment 30-1: This comment expresses a desire to keep the preschool open.

Response to Comment 30-1: The preschool facility currently operates on an expiring lease agreement and would no longer be operating at the site regardless of the approval of the Proposed Project. The comment does not identify an inadequacy or inaccuracy in the IS/MND.

Comment Letter 31–

Comment 31-1: This comment expresses a concern regarding the lack of parking for beach access and suggests that the project include parking.

Response to Comment 31-1: The Proposed Project includes parking that is compliant with regulations to support the proposed park and community recreation center. Official parking will be provided onsite and along Obispo Road. The informal dirt lot on the Project site is not an official lot.

Comment Letter 32–

Comment 32-1: This comment expresses a desire to keep the preschool open.

Response to Comment 32-1: The preschool facility currently operates on an expiring lease agreement and would no longer be operating at the site regardless of the approval of the Proposed Project. The comment does not identify an inadequacy or inaccuracy in the IS/MND.

Comment Letter 33–

Comment 33-1: This comment expresses a desire to keep the preschool open.

Response to Comment 33-1: The preschool facility currently operates on an expiring lease agreement and would no longer be operating at the site regardless of the approval of the Proposed Project. The comment does not identify an inadequacy or inaccuracy in the IS/MND.

Comment Letter 34–

Comment 34-1: This comment expresses a desire to keep the preschool open.

Response to Comment 34-1: The preschool facility currently operates on an expiring lease agreement and would no longer be operating at the site regardless of the approval of the Proposed Project. The comment does not identify an inadequacy or inaccuracy in the IS/MND.

Comment Letter 35–

Comment 35-1: This comment expresses a desire to keep the preschool open.

Response to Comment 35-1: The preschool facility currently operates on an expiring lease agreement and would no longer be operating at the site regardless of the approval of the Proposed Project. The comment does not identify an inadequacy or inaccuracy in the IS/MND.

Comment Letter 36–

Comment 36-1: This comment expresses a desire to keep the preschool open.

Response to Comment 36-1: The preschool facility currently operates on an expiring lease agreement and would no longer be operating at the site regardless of the approval of the Proposed Project. The comment does not identify an inadequacy or inaccuracy in the IS/MND.

Comment Letter 37–

Comment 37-1: This comment expresses a desire to keep the preschool open.

Response to Comment 37-1: The preschool facility currently operates on an expiring lease agreement and would no longer be operating at the site regardless of the approval of the Proposed Project. The comment does not identify an inadequacy or inaccuracy in the IS/MND.

Comment Letter 38a–

Comment 38a -1: This comment expresses a desire to keep the preschool open.

Response to Comment 38a -1: The preschool facility currently operates on an expiring lease agreement and would no longer be operating at the site regardless of the approval of the Proposed Project. The comment does not identify an inadequacy or inaccuracy in the IS/MND.

Comment Letter 38b–

Comment 38b -1: This comment stated that the cost of the preschool property was too much for the preschool to purchase.

Response to Comment 38b -1: The comment does not identify an inadequacy or inaccuracy in the IS/MND.

Comment Letter 39–

Comment 39-1: This comment expresses a desire to keep the preschool open.

Response to Comment 39-1: The preschool facility currently operates on an expiring lease agreement and would no longer be operating at the site regardless of the approval of the Proposed Project. The comment does not identify an inadequacy or inaccuracy in the IS/MND.

Comment Letter 40–

Comment 40-1: This comment expresses a desire to keep the preschool open.

Response to Comment 40-1: The preschool facility currently operates on an expiring lease agreement and would no longer be operating at the site regardless of the approval of the Proposed Project. The comment does not identify an inadequacy or inaccuracy in the IS/MND.

Comment Letter 41–

Comment 41-1: This comment expresses a desire to keep the preschool open.

Response to Comment 41-1: The preschool facility currently operates on an expiring lease agreement and would no longer be operating at the site regardless of the approval of the Proposed Project. The comment does not identify an inadequacy or inaccuracy in the IS/MND.

Comment Letter 42–

Comment 42-1: This comment expresses a desire to keep the preschool open.

Response to Comment 42-1: The preschool facility currently operates on an expiring lease agreement and would no longer be operating at the site regardless of the approval of the Proposed Project. The comment does not identify an inadequacy or inaccuracy in the IS/MND.

Comment Letter 43a–

Comment 43a-1: This comment states that this project will negatively impact available parking for the beach.

Response to Comment 43a-1: The Proposed Project includes parking that is compliant with regulations to support the proposed park and community recreation center. Official parking will be provided onsite and along Obispo Road. The informal dirt lot on the Project site is not an official lot.

Comment Letter 43b–

Comment 43b-1: This comment questions if the Project would improve Obispo Road.

Response to Comment 43b-1: The Proposed Project would provide angled parking along Obispo Road. The comment does not identify an inadequacy or inaccuracy in the IS/MND.

Comment Letter 44a–

Comment 44a-1: The comment expresses opposition to the closing of the Picasso Preschool.

Response to Comment 44a-1: The preschool facility currently operates on an expiring lease agreement and would no longer be operating at the site regardless of the approval of the Proposed Project. The comment does not identify an inadequacy or inaccuracy in the IS/MND.

Comment 44a-2: The comment states that the posting of two notices on the project site and one posting in the newspaper was insufficient.

Response to Comment 44a-2: Noticing for the comment period was completed in compliance with the CEQA guidelines. Notices identifying the 30-day comment period were posted onsite, in the newspaper and on the District's website, and the County of San Mateo County Clerk. In addition, the IS/MND and associated notices were uploaded to the Office of Planning and Research State Clearinghouse's CEQAnet, which serves as the public access portal for all CEQA documents completed throughout the state of California.

Comment Letter 44b–

Comment 44b-1: The comment letter provides a timeline regarding the purchase of the Picasso Preschool and various meetings and decisions made regarding the use of the site and survey of the public regarding the purchase and planned uses for the building.

Response to Comment 44b-1: The comment does not identify an inadequacy or inaccuracy in the IS/MND.

Comment Letter 44c–

Comment 44c-1: The comment expresses opposition to the Community Center.

Response to Comment 44c-1: The comment addresses components of the Proposed Project but does not identify an inadequacy or inaccuracy in the IS/MND.

Comment 44c-2: The comment states that preferences regarding parking were ignored.

Response to Comment 44c-2: The Proposed Project includes parking that is compliant with regulations to support the proposed park and community recreation center. Official parking will be provided onsite and along Obispo Road. The informal dirt lot on the Project site is not an official lot.

Comment 44c-3: The comment states that there is public concern regarding traffic and congestion and that a traffic mitigation report was not prepared and is required. The comment also states that a vehicle miles estimate is also required by CEQA and that CEQA does not allow a new use to assume that it would involve all previous travel trips without any extra vehicle miles traveled (VMT)s.

Response to Comment 44c-3: As described in Section 3.17, *Transportation* of the IS/MND, a Construction Traffic Management Plan, as required by Mitigation Measure TR-1, would be prepared and implemented to minimize potential traffic-related impacts during construction activities.

Additionally, the analysis included in the IS/MND is consistent with Office of Planning and Research (OPR) guidelines regarding vehicle miles traveled (VMT) per Senate Bill 743 (Vehicles Miles Traveled Policy). Creating a community park and recreation center would serve the local underserved community and would not result in a VMT-producing land use. Based on visitor counts from the nearby Quarry Park, it is assumed that the Proposed Project would generate a similar number of trips per day (approximately 90 trips) which would be below the Office of Planning and Research (OPR) threshold of 110 trips per day. Additionally, the Proposed Project would add a previously non-existent amenity to the El Granada Community, which would reduce the miles traveled by residents that would previously need to travel to adjacent communities to access similar recreational resources, thereby reducing overall regional VMT. Furthermore, the Proposed Project's approach to analyzing VMT related impacts was confirmed to be consistent with the OPR Technical Advisory by Caltrans per Comment Letter 61. Caltrans stated that "Per the IS/MND, this project is found to have a less than significant VMT impact, therefore working towards meeting the State's VMT reduction goals."

Comment 44c-4: The comment expresses concern regarding the cost of the Proposed Project, the purchase and removal of the Picasso Preschool, and the need for adequate parking.

Response to Comment 44c-4: Funding is not required to be considered in a CEQA document. The purchase of the property and the expiration of the current preschool lease are not included as part of this Proposed Project and are therefore not considered. As discussed in Response to Comment 44c-2 above, the parking proposed as part of the Project is sufficient to satisfy the requirements of the proposed park and community recreation center. Official parking will be provided onsite and along Obispo Road. The informal dirt lot on the Project site is not an official lot.

Comment Letter 45–

Comment 45-1: This comment states that the Project will negatively impact available parking for the beach.

Response to Comment 45-1: The Proposed Project includes parking that is compliant with regulations to support the proposed park and community recreation center. Official parking will be provided onsite and along Obispo Road. The informal dirt lot on the Project site is not an official lot.

Comment Letter 46–

Comment 46-1: This comment expresses a desire to keep the preschool open.

Response to Comment 46-1: The preschool facility currently operates on an expiring lease agreement and would no longer be operating at the site regardless of the approval of the Proposed Project. The comment does not identify an inadequacy or inaccuracy in the IS/MND.

Comment Letter 47–

Comment 47-1: The comment states that the Proposed Project will significantly change the character of El Granada and will benefit a larger non-contributing community. The comment lists concerns and questions regarding Project notification, operating hours, police services, maintenance, overall cost, landscaping, homelessness, public uses, and GCSD staff.

Response to Comment 47-1: The comment provides a general assertion regarding a change in community character but does not identify an inaccuracy or inadequacy in the IS/MND. As described in Section 3.1, *Aesthetics*, the creation of a park and associated amenities would be visually consistent with the surrounding area and would upgrade an existing dirt lot and grasslands with a community park. The answers to the commenter’s questions are provided in bullet form, below.

- The public received notice of the Proposed Project in May 2024 per CEQA guidelines. Notices identifying the 30-day comment period were posted on-site, in the newspaper, on the GCSD’s website, and with the County of San Mateo County Clerk. In addition, the IS/MND and associated notices were uploaded to the OPR State Clearinghouse’s CEQAnet, which serves as the public access portal for all CEQA documents completed throughout the state of California.
- As described in Section 2, *Project Description*, the park would be open daily from dawn to dusk. The hours of operation for the dog park would be the same as the hours of operation of the park.
- The San Mateo County sheriff provides police services to the local area.

- The GCSO would be responsible for maintenance and landscaping of the park facilities.

Comment Letter 48–

Comment 48-1: This comment states that the Project will negatively impact available parking for the beach.

Response to Comment 48-1: The Proposed Project includes parking that is compliant with regulations to support the proposed park and community recreation center. Official parking will be provided onsite and along Obispo Road. The informal dirt lot on the Project site is not an official lot.

Comment Letter 49–

Comment 49-1: The comment states that the IS/MND does not evaluate the economic and social wellbeing of the community with the closure of the Picasso preschool.

Response to Comment 49-1: Analysis of social and economic considerations are not a requirement under CEQA. The comment does not identify an inadequacy or inaccuracy in the IS/MND.

Comment 49-2: The comment states that the IS/MND does not consider the Caltrans project along Highway 1 and the impact of several projects that would result in the removal of parking.

Response to Comment 49-2: The Proposed Project would not result in the removal of legal parking and thus would not contribute to an overall cumulative reduction in legal parking in the community of El Granada. The comment does not identify an inadequacy or inaccuracy in the IS/MND.

Comment Letter 50–

Comment 50-1: The comment states that there was inadequate time for the MCC and the public to review and comment on the IS/MND and its appendices.

Response to Comment 50-1: Noticing for the comment period was completed in compliance with the CEQA guidelines. Notices identifying the 30-day comment period were posted onsite, in the newspaper, on the District's website, and with the County of San Mateo County Clerk. In addition, the IS/MND and associated notices were uploaded to the Office of Planning and Research State Clearinghouse's CEQAnet, which serves as the public access portal for all CEQA documents completed throughout the state of California. Additionally, the comment period was informally extended by 30 days and closed on July 19, 2024.

Comment 50-2: The comment states that development of the site would reduce available parking for Surfer's Beach and that there would be a cumulative impact with the inclusion of the Caltrans bike path project on Highway 1. The comment also notes that Highway 1 may need to be moved inland in the future due to sea level rise.

Response to Comment 50-2: The Proposed Project would not result in the removal of legal parking and thus would not contribute to an overall cumulative reduction in legal parking in the community of El Granada. Should Highway 1 need to be moved inland and impact the Proposed Project, environmental analysis would need to be conducted at that time to evaluate the loss of the Project

and the associated recreational amenities. The comment does not identify an inadequacy or inaccuracy in the IS/MND.

Comment 50-3: The comment states that there is concern in the community regarding the loss of Picasso Preschool.

Response to Comment 50-3: The preschool facility currently operates on an expiring lease agreement and would no longer be operating at the site regardless of the approval of the Proposed Project. The comment does not identify an inadequacy or inaccuracy in the IS/MND.

Comment 50-4: The comment states that there is community concern regarding the potential for dog waste to impact groundwater.

Response to Comment 50-4: Project operation would include routine facility maintenance, including the dog park, to keep the park clean for visitors by closing the park intermittently for regularly scheduled and/or special maintenance activities, as necessary. Pet waste bag dispensers and signage would be available to park visitors and at the dog park itself to properly collect and dispose of pet waste. These steps would ensure that the Project would not significantly increase unattended pet waste at the site and would reduce the potential for pet waste to effect groundwater supplies.

In addition, LCP policy 7.11 requires the establishment of buffer zones within riparian corridors, with 50 feet outward for perennial streams and 30 feet outward for intermittent streams. The implementation of this buffer zone policy would prevent potential pet waste from entering surface waters. The dog park would not be in the vicinity of riparian buffer areas allowing waste to potentially permeate into the ground.

Comment 50-5: The comment states that the IS/MND does not include a discussion regarding the wetlands on the north side of the site, as identified by a previous San Mateo Resource Conservation District (RCD) document.

Response to Comment 50-5: Horizon (Montrose) biologists, including a USACE-certified wetland delineator, conducted a site visit on March 16, 2023 to characterize biological resources at the Project site. The findings from that visit were mostly consistent with the Biological Resources Assessment (BRA) from BioMaAS in 2020. The site supported non-native annual grassland/ruderal habitat. Irisleaf rush (*Juncus xiphodes*) was observed growing in several areas as a characteristic species at the site. Sample pits were dug at these locations to examine soils to see if hydric conditions (e.g., depleted soils, redox reactions, sulfate reduction, or organic matter accumulation) were present. No hydric soils were observed. Thus, these areas did not meet the USACE three-parameter definition (i.e., hydrophytic vegetation, wetland hydrology, and hydric soils) to be classified as a wetland.

A wetland assessment conducted by the RCD (2021) evaluated potential wetlands in the Project area. The assessment observed hydrophytic plants, such as silverweed cinquefoil (*Potentilla anserina*) and common rush (*Juncus patens*), but at a percent cover that was lower in meeting the necessary criteria for wetland vegetation. The San Mateo County LCP's definition of a wetland follows the USACE three-parameter wetland definition and further state that in San Mateo County, wetlands typically contain the following plants: cordgrass, pickleweed, jaumea, frankenia, marsh

mint, tule, bullrush, narrow-leaf cattail, broadleaf cattail, pacific silverweed, salt rush, and bog rush. To qualify, a wetland must contain at least a 50% cover of some combination of these plants, unless it is a mudflat. Additionally, the assessment determined soils lacked evidence of hydric conditions and indicators of wetland hydrology were indeterminate. The wetland assessment did not find wetlands on site and concluded that wetter areas within the open field areas as unlikely to be meet the definition of a wetland.

Previous and current anthropomorphic activities have generally reduced the habitat quality at the Project site resulting in non-native annual grassland/ruderal vegetation as the dominant habitat. Factors include pressures from the highly urbanized environment surrounding the site, row crop farming in the 1990's, significant earthmoving during the construction of Highway 1, and the construction of an underground sewer wet weather storage facility retention basin.

The Proposed Project would improve and enhance two existing onsite drainage channels to create a natural area and expand and improve onsite vegetation. Including a rain garden within the Project's Green infrastructure would promote on-site infiltration and improve water quality pursuant to the Municipal Regional Stormwater NPDES Permit for Phase I municipalities and agencies in the San Francisco Bay Area (Order R2-2022-0018) (MRP). Additionally, the Proposed Project would include vegetation management and invasive species eradication to restore native perennial grasses and forbs, enhancing habitat and foraging for native wildlife within proposed park. Proposed work within the limits of existing riparian vegetation would be avoided with the exception of installing a new free span pedestrian bridge over the unnamed drainage channel. The Proposed Project would result in increased habitat quality and function compared to the existing conditions of Burnham Strip. In addition, GCSD would install a permeable trail extending from the Coronado Street crosswalk to Obispo Road, and along the Obispo Road shoulder to the central portion of the site. This trail is along the roadway edge and is mostly in disturbed and/or ruderal areas and would not directly impact Burnham Creek.

Comment 50-6: The comment states that if a pickleball court is included, it should be included closer to Highway 1.

Response to Comment 50-6: Comment noted. The comment makes a comment on the potential components of the park but does not identify an inadequacy or inaccuracy in the IS/MND.

Comment 50-7: The comment states that the Proposed Project would need to comply with the San Mateo Local Coastal Program regarding view corridors and states that the project's impact on the existing view corridors needs to be fully and accurately analyzed.

Response to Comment 50-7: Analysis of the project's compliance on Local Coastal Program regarding impacts to view corridors was included in the IS/MND. The comment does not identify how the analysis was deficient and thus does not identify an inadequacy or inaccuracy in the IS/MND.

Comment 50-8: The comment states that the MCC desires to expand the range of structures that are Dark Sky compliant.

Response to Comment 50-8: The lighting considered for the project would be required security lighting that is down-shielded to minimize glare and illumination outside the intended area, and

would be operated with occupancy sensors, motion detectors, photosensors, or timers to only function during nighttime hours. This lighting is required onsite and would be overall consistent with the goals of Dark Sky compliance.

Comment 50-9: This comment raises several concerns regarding operational expenses.

Response to Comment 50-9: Operational expense is not a consideration under CEQA. This comment does not identify an inadequacy or inaccuracy in the IS/MND.

Comment 50-10: This comment highlights the potential frequency of special events at the park/community center and states that the public should be aware of this frequency and its potential noise.

Response to Comment 50-10: The comment includes text from the Project Description that was included as Chapter 2 of the IS/MND. The noise analysis completed for the Project included consideration and analysis of the potential frequency of these activities. This comment does not identify an inadequacy or inaccuracy in the IS/MND.

Comment 50-11: This comment identifies six typographical or grammatical errors in the document.

Response to Comment 50-11: Corrections to the errors described in the comment are addressed in the Errata section of this memorandum below.

Comment Letter 51–

Comment 51-1: This comment states that this project will negatively impact available parking for the beach.

Response to Comment 51-1: The Proposed Project includes parking that is compliant with regulations to support the proposed park and community recreation center. Official parking will be provided onsite and along Obispo Road. The informal dirt lot on the Project site is not an official lot.

Comment Letter 52–

Comment 52-1: This comment states that the Proposed Project will negatively impact available parking for the beach.

Response to Comment 52-1: The Proposed Project includes parking that is compliant with regulations to support the proposed park and community recreation center. Official parking will be provided onsite and along Obispo Road. The informal dirt lot on the Project site is not an official lot.

Comment Letter 53–

Comment 53-1: The comment expresses concern over public access to the coast with removal of the informal dirt lot with implementation of the Proposed Project. The comment requests clarification on how removal of this parking lot would not contribute to a cumulative public access impact and also mentions other local projects that have resulted in the removal of parking in the local area.

Response to Comment 53-1: The informal dirt lot on the Project site is not an official lot. Thus, the Proposed Project site does not currently provide official parking and implementation of the Proposed Project would not contribute to an overall cumulative reduction in legal parking in the

community of El Granada or a cumulative public access impact. The comment does not identify an inadequacy or inaccuracy in the IS/MND.

Comment 53-2: The comment expresses concern over traffic with the removal of the Surfer's beach parking lot from implementation of the Proposed Project.

Response to Comment 53-2: The informal dirt lot on the Project site is not an official lot and does not currently provide official parking in the local area. Traffic and circulation impacts associated with implementation of the Proposed Project are described in Section 3.17, *Transportation* of the IS/MND.

Comment 53-3: The comment expresses concern over the loss of parking from Surfer's beach parking lot and its impact to emergency response services from CalFire Station 41. The comment also expresses concern over the potential loss of public funds and the closure of the Picasso Preschool.

Response to Comment 53-3: The informal dirt lot on the Project site is not an official lot. As described in Section 3.17, *Transportation* of the IS/MND, a Construction Traffic Management Plan will be prepared and implemented, as described in Mitigation Measures TR-1, which would limit conflicts between construction traffic, local traffic, and local emergency responders and ensure that emergency access is provided throughout construction. Implementation of the Proposed Project would not result in long-term effects to emergency service providers.

The source of funding is not a CEQA issue so is therefore not discussed in the IS/MND. The preschool facility currently operates on an expiring lease agreement and would no longer be operating at the site regardless of the approval of the Proposed Project.

Comment 53-4: The comment expresses concern over noise from the community center events that may occur after implementation of the Proposed Project.

Response to Comment 53-4: All special events held at the Community Recreation Center would require permits with GCSO approval. Additionally, the use of amplified sound systems is required to stop by 10 p.m. Monday through Saturday and by 9 p.m. on Sundays; the use of amplified sound systems during more sensitive hours when people sleep (nighttime between 10:00 pm to 7:00 am) would not occur. To further reduce noise impacts associated with amplified sound during special events, GCSO will require additional permitting for the use of amplified sound systems and limit sound to be at or below 105 dBA at 5 feet from the boundary of the special event area, as described in Mitigation Measure NOI-1. GCSO will enforce the noise restrictions during these events.

Comment 53-5: The comment expresses concern over impacts to the scenic coastal view corridor resulting from implementation of the Proposed Project.

Response to Comment 53-5: Implementation of the Proposed Project would convert the informal dirt lot, skate ramp, and existing single-story structure to a community park that would include walking paths, fitness stations, restrooms and showers, a dog park, small and group picnic areas, kids' play structures, skate ramp, parking areas, and an expanded community recreation center. The Project site is surrounded by urban development; thus, the Project components would be visually consistent with the surrounding area and although would involve the construction of an additional

one-story structure, views of the coast would not be substantially blocked or degraded. The Proposed Project would be subject to the policies included in the Local Coastal Program (LCP) and as described in Table 3.1-1, the Proposed Project was determined to be consistent, including policies related to the regulation of scenic corridors.

Comment 53-6: The comment seeks clarification on the IS/MND noticing and public outreach and states that the public was not given adequate notice or opportunities to provide feedback.

Response to Comment 53-6: Noticing for the comment period was completed in compliance with the CEQA guidelines. Notices identifying the 30-day comment period were posted onsite, in the newspaper, on GCSO's website, and with the County of San Mateo County Clerk. In addition, the IS/MND and associated notices were uploaded to the OPR State Clearinghouse's CEQAnet, which serves as the public access portal for all CEQA documents completed throughout the state of California. Applicable local, regional, and state agencies were notified of the 30-day public comment period for the Proposed Project. Additionally, the public comment period was informally extended an additional 30 days and closed on July 19, 2024. Attendance at other community meetings is not a CEQA issue.

Comment 53-7: The comment states that the Proposed Project is not consistent with the LCP policies and states that a Needs Assessment Analysis should have been prepared at part of the IS/MND.

Response to Comment 53-7: As described throughout the IS/MND, the IS/MND is consistent with the LCP policies (refer to Section 3.11, *Land Use and Planning*). The Proposed Project would create a community park that would provide recreational opportunities to the public. Additionally, the preschool facility currently operates on an expiring lease agreement and would no longer be operating at the site regardless of the approval of the Proposed Project. Further, a Needs Assessment and Analysis is not part of the CEQA process and was not prepared as part of the Proposed Project.

Comment 53-8: The comment expresses concern over the IS/MND and the adequacy of the information included in the Biological Resources Report.

Response to Comment 53-8: The Biological Resources Report (Montrose 2023) provided the necessary data and information to adequately address potential Project impacts specifically related to the biological resources section of the IS/MND. Wildlife observed during the 2023 survey was noted in the report. The report characterized biological conditions as a basis for CEQA resource evaluations and was not intended to be a comprehensive all-inclusive biological evaluation.

The Biological Resources Report cites all special status species observations within the 9 quad search radius. Potential for special-status species to occur in the Project area and the potential for the Project to impact those species was thoroughly assessed. For example, the likelihood of San Francisco garter snake (*Thamnophis sirtalis tetrataenia*; SFGS) to occur in the Project area is not expected as potentially suitable aquatic habitat for this species would be confined to the Burnham Creek riparian corridor (which is outside the Project area), there is no continuous connectivity between aquatic and upland habitat or dense emergent vegetation in aquatic areas, suitable aquatic habitat is absent from the Project area, and there is a lack of abundant prey base including primarily California red-legged frog (*Rana draytonii*; CRLF), small fish and tertiary prey sources such as newts

within the Proposed Project area. Per the U.S. Fish and Wildlife Service (USFWS) Recovery Plan (1985) and the Species Status Assessment (USFWS 2020) for SFGS, individuals need permanent freshwater habitat with dense aquatic vegetation and adjacent upland habitat with rodent burrows for estivation, movement corridors within aquatic and upland habitat, and amphibian prey to support their caloric needs throughout their life stages (i.e., adults, juveniles, and neonates). SFGS primarily feed on CRLF and treefrogs, and SFGS densities have been found to be loosely correlated with CRLF frog densities: sites with high frog densities will often have higher snake densities, and the caveat that some sites may have frogs present but not snakes (Barry 1996; USFWS 2020). While CRLF have potential to occur in riparian habitats within the vicinity of Project area (Burnham Creek; outside of Project area), the riparian areas associated with the hydrological features (unnamed drainage 1 and unnamed drainage 2) in the Project area are isolated as these drainages lack emergent vegetation (escape cover), have been disconnected from the upper catchment areas, and are culverted under El Granada. The Project site is surrounded by urban development, Highway 1, and other anthropomorphic disturbances (site routinely mowed in ruderal grassland area) and land use surround the riparian areas thereby preventing overland travel of CRLF to the Project area. The Project site does not contain suitable habitats components for CRLF, thus limiting it as a suitable prey base for SFGS.

The associated and suitable aquatic habitat for SFGS consists of emergent vegetation (cattails; *Typha spp.*, bulrushes; *Stripus spp.*, and spike rushes; *Juncos spp.*) along the borders of marshes, ponds or lakes and aquatic sites (i.e., stream of pond) and grasslands or bank sides that are used for basking, with nearby dense vegetation or open water to provide escape cover. Suitable habitat components needed for SFGS requires upland sites (i.e., grassy hillsides) near drainages or ponds for escape cover and for basking, rodent burrows that are away from aquatic sites that provide hibernation sites and escape cover, and low-lying marsh areas for feeding and reproduction (USFWS 1985). The adjacent upland habitat for SFGS would consist of a mixture of grassland and shrub species that include coyote brush (*Baccharis pilularis*), wild oat, wildbarely (*Hordeum spp.*), and brome species (*Bromus spp.*) (Larsen 1994).

The Biological Resources Report (2023) listed plants that were observed at the time of the survey and stated that the aquatic and upland habitats within the Project area are isolated with no continuous nor semi-continuous connection to known locations or suitable habitat areas for this species. The graveled parking lot within the Burnham Strip disconnects potential suitable aquatic habitat of Burnham Creek from any adjacent upland habitat, along with limited prey base of CRLF is limited within the Project site.

Implementation of the Proposed Project would maintain and/or enhance ecological conditions and there would be no significant impacts to biological resources within the Project area. Additionally, the IS/MND assesses the environmental impacts of the Proposed Project that are based on the environmental checklist provided in Appendix G of the CEQA Guidelines. Section 3.4, *Biological Resources* of the IS/MND includes an adequate discussion of the rationale used to determine the significance level of the Proposed Project's environmental impact for each checklist question. Implementation of Best Management Practices (BMPs) during construction would minimize the potential for runoff, sediment, or hazardous materials to enter special-status habitat, and Mitigation Measures BIO-1, BIO-2, and BIO-3 would prevent potential impacts to special-status species and

wildlife and their habitats during the Project. In addition, the IS/MND is in conformance with the applicable existing laws and standards established by federal, state, and local regulations.

Wetlands are addressed in Response to Comment 50-5.

Comment 53-9: The comment expresses concern over the loss of parking and the associated effects to water-related recreational opportunities (e.g., surfing) in the local area. The comment also requests clarification on the type of signage that will be in the view corridor.

Response to Comment 53-7: The informal dirt lot on the Project site is not an official lot. However, the Proposed Project would provide official parking onsite and along Obispo Road. Refer to Section 3.16, *Recreation* for a discussion of recreational-related impacts. The unofficial use of the dirt lot by surf schools is not a CEQA issue. As described in Section 2, *Project Description*, occasional interpretative signage would be incorporated into the design of the trail and along the pathways. Additionally, signs identifying operating hours of the park would be posted at the site. All signage would be in compliance with local regulations.

Comment 53-10: The comment expresses concern over public safety related to the loss of parking at the informal dirt lot.

Response to Comment 53-10: The informal dirt lot on the Project site is not an official lot. However, the Proposed Project would provide official parking onsite and along Obispo Road.

Comment 53-11: The comment expresses concern over sea level rise and effects to the Project site.

Response to Comment 53-11: The elevation of Highway 1 adjacent to the Proposed Project area is approximately 30 feet above mean high sea level (MHSL) and approximately 7 feet higher in elevation than the Proposed Project area. Thus, sea level rise is not anticipated to overtop the highway at this location and the highway would thus act as a barrier to sea level intrusion at the Project site.

Comment 53-12: The comment states that the Proposed Project is inconsistent with the LCP due to the impacts to a wetland on site.

Response to Comment 53-12: The comment of LCP and wetlands is addressed in Response to Comment 50-5 and Response to Comment 53-8.

Comment 53-13: This comment expresses concerns regarding the need and use for the new community recreation center and facilities.

Response to Comment 53-13: The Proposed Project proposes to construct a new community recreation center that would provide the public with recreational facilities and opportunities (e.g., fitness classes, workshops, event space, etc.). The interest in use of the facility is not a CEQA issue.

Comment 53-14: The comment expresses concern over invasive species and who will be responsible for proposed park maintenance and monitoring. The comment also specifically expresses concerns regarding the methods and costs associated with the infrastructure, the native plant enhancements, and the invasive species eradication that will occur for the Proposed Project.

Response to Comment 53-14: The referenced 2017 Natural Resources Management Plan for Burnham Strip and activities conducted under that plan are not part of the Proposed Project. The Proposed Project would include vegetation management and invasive species eradication in areas that would remain ungraded. GCSD will be responsible for park operations and maintenance of the Proposed Project. Funding of the Proposed Project is not a CEQA issue and is therefore not discussed in the IS/MND.

Comment 53-15: The comment expresses concerns that the IS/MND did not disclose all protected resources and is not in compliance with the LCP.

Response to Comment 53-15: This comment is addressed in Response to Comment 53-8, and Response to Comment 50-5.

Comment 53-16: The comment expresses concern over the dog park under the Proposed Project and the effects to water quality.

Response to Comment 53-16: This comment is addressed in Response to Comment 50-4.

Comment Letter 54–

Comment 54-1: The comment expresses concern regarding the noise associated with operation of the Proposed Project, increased recreational vehicle users at the site, and who will be responsible for enforcing the mitigation measures included in the IS/MND.

Response to Comment 54-1: To address concerns related to amplified noise, please refer to Response to Comment 53-4. The operating hours for the park and its facilities will be from dawn until dusk. GCSD will be responsible for enforcing the hours and for implementing the mitigation measures identified in the IS/MND.

Comment Letter 55–

Comment 55-1: The comment expresses concern regarding wildlife, water quality, and lawns from implementation of the Proposed Project.

Response to Comment 55-1: This comment is addressed in Response to Comment 50-4, 50-5, and 53-8. The lawn that would be installed as part of the Proposed Project would require irrigation. As described in Section 3.19, *Utilities and Service Systems*, the Proposed Project would be serviced by the Coastside County Water District which has sufficient capacity to meet the water needs associated with the Proposed Project. The type of grass installed for the lawn would be determined by GCSD; however, it would be consistent the local regulations.

Comment Letter 56–

Comment 56-1: This comment states that the Proposed Project will negatively impact available parking for the beach.

Response to Comment 56-1: The Proposed Project includes parking that is compliant with regulations to support the proposed park and community recreation center. Official parking will be provided onsite and along Obispo Road. The informal dirt lot on the Project site is not an official lot.

Comment Letter 57–

Comment 57-1: The comment expresses concern with removal of the informal dirt lot, skateboard ramp, noise associated with the addition of the dog park and other facilities, Project design, public safety risks, and increased out of town traffic resulting in trash and congestion.

Response to Comment 57-1: The informal dirt lot on the Project site is not an official lot. The operating hours of the dog park will be from dawn until dusk; noise generated from barking dogs is not considered a significant noise impact under CEQA. Refer to Response to Comment 53-4 for a discussion of potential noise effects from amplified sound associated with the new Community Recreation Center. Walking trails are proposed as part of the Proposed Project. Operating hours of the park are from dawn until dusk; overnight camping will not be permitted on site. Trash receptacles will be provided on site. The Proposed Project will provide a neighborhood park to the local community and would not generate a substantial number of new regional vehicle trips (refer to Response to Comment 44c-3 for a further discussion).

Comment Letter 57b—

Comment 57b-1: This comment is a resubmittal of Comment Letter 57. No additional comments were included.

Response 57b-1: Refer to Response to Comment 57-1.

Comment Letter 58–

Comment 58-1: This comment letter is a resubmittal of Comment Letter 47. No additional comments were included.

Response to Comment 58-1: Refer to Response to Comment 47-1.

Comment Letter 59–

Comment 59-1: The comment requests that the public comment period be extended and expresses concerns about the design of the park, the planning process, loss of parking and increased traffic congestion, view impacts, lighting, operational expenses, increased noise due to the community center, impacts to the Picasso school, and open space.

Response to Comment 59-1: Responses to the comments in 59-1 are provided below:

- CEQA mandates that the public comment period for IS/MNDs be a minimum of 20 days; the public comment period was 30 days in compliance with CEQA requirements and was informally extended an additional 30 days.
- The Proposed Project design incorporated input from the public. Project components include a creek riparian zone, lawn, restrooms, parking, skate ramp, picnic area, playgrounds, half-court basketball court, bocce court, play lawn, dog park, community recreation center, multi-modal trails, and a library kiosk. Refer to Response to Comment 50-4 for a discussion of the dog park.

- **The informal dirt lot on the Project site is not an official lot.** Additionally, the Proposed Project would provide official parking on-site. Refer to Response to Comment 12a-1 for a discussion of traffic.
- The Proposed Project would be subject to the policies included in the LCP and as described in Table 3.1-1, the Proposed Project was determined to be consistent with the LCP, including policies related to the regulation of scenic corridors and scenic vistas. The Proposed Project does not include lighting that would impede nighttime views; although security lighting would be provided it would be low-level and down-shielded and be consistent with lighting in the surrounding area. Refer to Response to Comment 53-5 for further discussion of potential impacts to coastal views.
- Funding is not a CEQA topic and is therefore not discussed in this IS/MND.
- Refer to Response to Comment 53-4 regarding noise generated by the new community recreation center.
- The Picasso School currently operates on an expiring lease agreement and would no longer be operating at the site regardless of the approval of the Proposed Project.
- Comment noted regarding the inclusion of more open green space. Refer to Section 3.4, *Biological Resources* of the IS/MND for a discussion on birds and biological resources.

Comment Letter 60–

Comment 60-1: This comment contains a discussion of the value of early childhood care and expresses a desire to keep the preschool open.

Response to Comment 60-1: The preschool facility currently operates on an expiring lease agreement and would no longer be operating at the site regardless of the approval of the Proposed Project. The comment does not identify an inadequacy or inaccuracy in the IS/MND.

Comment Letter 61–

Comment 61-1: The comment summarizes the Project and states that the VMT analysis was completed in accordance with OPR's guidance.

Response to Comment 61-1: Comment noted.

Comment 61-2: The comment states that the Project should consider adding additional signs, markings, and other enhancements to increase motorist yield rates for pedestrians, widening and paving the road shoulders on Obispo Road, and restriping to create additional dedicated space for pedestrians and cyclists and consider whether additional bike parking is appropriate.

Response to Comment 61-2: Due to the constraints of the Proposed Project site, many of these suggestions are not feasible. Street signage is under the purview of the County and County Public Works.

Comment 61-3: The comment requests demonstration that there will not be an increase in ditch velocities for both ditches and/or flow that enters the State Right of Way (ROW) and that the onsite

widened ditches will conform to existing State ditches. Additionally, the comment states that future submittals should include watershed maps for existing and proposed conditions as well as plans, details, and calculations to show that the proposed widened ditches will not adversely impact the integrity of existing ditches.

Response to Comment 61-3: Comment noted. As described in Section 3.10, *Hydrology and Water Quality*, the existing Project site is compacted consisting partly of a dirt lot and the slight increase in impervious surface area resulting from implementation of the Proposed Project would not result in a significant increase in runoff. Additionally, the Project site involves a limited catchment area. Therefore, because the overall area and volume of runoff would be small, no erosive flows would occur. Additionally, the installation of green infrastructure onsite would further reduce stormwater flows and potential erosion.

Comment 61-3: The comment states that Project work that requires movement of oversized or excessive load vehicles on State roadways requires a transportation permit issued by Caltrans. The comment also notes that a Transportation Management Plan (TMP) may also be required to reduce construction traffic impacts to the State highway. Additionally, the comment notes that as the lead agency, GCSD is responsible for mitigation. The comment also notes that the Proposed Project must maintain bicycle and pedestrian access during construction, Caltrans affected facilities must meet American Disabilities Act (ADA) Standards, and any permanent work or temporary traffic control that encroaches onto Caltrans' ROW requires a Caltrans- encroachment permit.

Response to Comment 61-3: Comment noted. This comment includes general language that advises GCSD on its legal and permit responsibilities. The comment does not identify an inadequacy or inaccuracy in the IS/MND.

Comment Letter 62–

Comment 62-1: The comment expresses a desire for a pickleball court.

Response to Comment 62-1: The comment is regarding the Project components and does not identify an inadequacy or inaccuracy in the IS/MND.

Comment Letter 63–

Comment 63-1: This comment states that the Proposed Project will negatively impact available parking in the area.

Response to Comment 63-1: The Proposed Project includes parking that is compliant with regulations to support the proposed park and community recreation center. Official parking will be provided onsite and along Obispo Road. The informal dirt lot on the Project site is not an official lot.

Comment 63-2: The comment expresses concern regarding the aesthetics of passive grass and its required water use.

Response to Comment 63-2: The comment expresses a viewpoint regarding the aesthetics of passive grassland but does not identify an inadequacy or inaccuracy in the analysis completed for the Proposed Project or identify a policy with which the Project would be in conflict. Refer to

Response to Comment 55-1 and Section 3.19, *Utilities and Service Systems* for a discussion of water use.

Comment Letter 64–

Comment 64-1: The comment expresses a desire to keep the informal dirt parking lot.

Response to Comment 64-1: The Proposed Project includes parking that is compliant with regulations to support the proposed park and community recreation center. Official parking will be provided onsite and along Obispo Road. The informal dirt lot on the Project site is not an official lot.

Comment 64-2: The comment disagrees with the design of the Proposed Project.

Response to Comment 64-2: Comment noted. The design of the Proposed Project considered input from the public and would be considered consistent with the surrounding area. Refer to Section 3.1, *Aesthetics* for more information. Additionally, the comment does not identify an inadequacy or inaccuracy in the IS/MND.

Comment 64-3: The comment states that the proposed trail on Obispo Road would impact the riparian area and reduce parking.

Response to Comment 64-3: As part of the Proposed Project, a permeable trail would be installed extending from the Coronado Street crosswalk to Obispo Road, and along the Obispo Road shoulder to the central portion of the site. This trail is along the roadway edge and is mostly in disturbed and/or ruderal areas and would not directly impact the riparian area of Burnham Creek. Official parking will be provided on-site and along Obispo Road under the Proposed Project.

Comment 64-4. The comment disagrees with the inclusion of the dog park.

Response to Comment 64-1: The comment does not identify an inadequacy or inaccuracy in the IS/MND.

Comment 64-5: The comment desires acknowledgement of the wetlands.

Response to Comment 64-5: This comment is addressed in Response to Comment 53-8 and Response to Comment 50-5.

Comment 64-6: The comment expresses a desire for the continuation of the preschool.

Response to Comment 64-6: The preschool facility is currently operating with an expiring lease agreement and would no longer be operating at the site regardless of the approval of the Proposed Project. The comment does not identify an inadequacy or inaccuracy in the IS/MND.

Comment Letter 65–

Comment 65-1: This comment contains a discussion of the value of early childhood care and expresses a desire to keep the preschool open. Additionally, the comment discusses the need for a park and potential funding sources.

Response to Comment 65-1: The preschool facility is currently operating with an expiring lease agreement and would no longer be operating at the site regardless of the approval of the Proposed

Project. The need for a park and potential funding sources are not considered under CEQA. The comment does not identify an inadequacy or inaccuracy in the IS/MND.

Comment Letter 66–

Comment 66-1: The comment expresses a concern regarding the reduction in available parking to access the beach areas and the hazards created by people jaywalking across Highway 1.

Response to Comment 66-1: The Proposed Project includes parking that is compliant with regulations to support the proposed park and community recreation center. Official parking will be provided onsite and along Obispo Road. The informal dirt lot on the Project site is not an official lot.

Comment 66-2: The comment states that the area has sufficient trail facilities but no other public sporting facilities such as a basketball court, sand or grass volleyball court, pickleball court, tennis courts, or multi-use field and the inclusion of a half-court basketball court is not sufficient.

Response to Comment 66-2: Comment noted. The comment expresses a desire in a change in Project components and does not identify an inadequacy or inaccuracy in the IS/MND.

Comment 66-3: The comment expresses a desire to maintain Picasso Preschool, build a second building for the Community Center, and questions the funding sources. The comment also would like to ensure that trash is picked up and that the noise ordinance would be maintained.

Response to Comment 66-3: The preschool facility is currently operating with an expiring lease agreement and would no longer be operating at the site regardless of the approval of the Proposed Project. Funding is not a CEQA issue and a response to, or consideration of, this issue is not required. The Project includes trash receptacles onsite, and the noise ordinance would be enforced by GCSD. The comment does not identify an inadequacy or inaccuracy in the IS/MND.

Comment Letter 67a–

Comment 67a-1: The comment expresses concern over the IS/MND regarding the 2023 Biological Resources Report and the potential presence of wetlands on site.

Response to Comment 67a-1: Refer to Response to Comment 50-5 for a discussion on wetlands and Response to Comment 53-8 for a discussion on the 2023 Biological Resources Report.

Comment 67a-2: The comment expresses concern regarding the need and demand of the Proposed Project.

Response to Comment 67a-2: GCSD under guidance of the Board determined that there is a need for the Park facilities and services. The Project would provide a neighborhood park in a community that currently does not have a park and thus, would result in a community enhancement. CEQA does not require a justification for the need of the project to be included in the analysis since the need was previously determined by the Board and GCSD.

Comment 67a-3: The comment states that Project should include stormwater management.

Response to Comment 67a-3: The Proposed Project includes stormwater management, more specifically a rain garden is included within the Project’s green infrastructure to promote on-site infiltration and improve water quality pursuant to the MRP.

Comment 67a-4: The comment states “improve and enhance two existing drainages.”

Response to Comment 67a-4: The site would improve and enhance the two existing unnamed drainages. However, this comment does not identify an inadequacy or inaccuracy in the IS/MND.

Comment 67a-5: The comment states to clarify what is meant by “improve onsite vegetation.”

Response to Comment 67a-5: The current vegetation on site is a mix of ruderal/non-native grassland, riparian, and developed land that is routinely mowed. The Proposed Project would remove non-native species and landscape the park with native and climate-appropriate trees, shrubs, grasses, and groundcovers resulting in an improvement to the vegetation onsite.

Comment 67a-6: The comment states “Project site characteristics”.

Response to Comment 67a-6 This comment does not identify an inadequacy or inaccuracy in the IS/MND.

Comment 67a-7: The comment expresses concern over the IS/MND regarding the presence of wetlands on site.

Response to Comment 67a-7: Refer to Response to Comment 50-5.

Comment 67a-8: The comment states that the IS/MND incorrectly labels the unnamed drainages as ephemeral.

Response to Comment 67a-8: The unnamed drainages convey stormwater runoff from the El Granada stormwater system across the Project site under Highway 1 to the Pacific Ocean. One of the drainages, Unnamed drainage #1 is ephemeral and stops flowing during the dry season. The other drainage near Ave Portola (unnamed drainage #2), is intermittent. This was correctly classified and described in the IS/MND.

Comment 67a-9: The comment expresses concern over the potential presence of wetlands on the Project site and the IS/MND’s lack of including a description of this habitat.

Response to Comment 67a-9: Refer to Response to Comment 50-5. The Project IS/MND is in conformance with the applicable existing laws and standards established by federal, state, and local regulations.

Comment 67a-10: The comment states that the trail on Obispo Road would impact the Burnham Creek riparian area.

Response to Comment 67a-10: Refer to Response to Comment 64-3.

Comment 67a-11: The comment states that the Biological Resources Report does not include an analysis of the vegetation before the project vs. after project completion.

Response to Comment 67a-11: The Biological Resources Report evaluates the existing biological conditions on site. Refer to Section 3.4, *Biological Resources* of this IS/MND for a discussion of potential impacts to biological resources associated with the Proposed Project.

Comment 67a-12: The comment requires clarification on the term “passive grassland” and that it should be changed to “native grassland” or “coastal terrace prairie” in the IS/MND.

Response to Comment 67a-12: Comment noted. Passive grassland refers to areas that would be restored with native perennial grasses and forbs. The term is consistent with the site plan included in Appendix A of the IS/MND. To maintain consistency between the IS/MND and site plans, no changes were made to the IS/MND.

Comment 67a-13: The comment requests clarification on the term “Passive Recreation Zone.”

Response to Comment 67a-13: The passive recreation zone refers to the portion of the Project site that would include improvements to the existing ruderal grassland near the community recreation center and multi-modal trail.

Comment 67a-14: The comment expresses concern over the use of the passive grassland area for overflow parking during large events that was mentioned at the previous public meetings.

Response to Comment 67a-14: Comment noted. Overflow parking would not be provided on the passive grassland area. The passive grassland area would be restored with native perennial grasses and forbs and encircled by mounded landforms (refer to Appendix A, Site Plan).

Comment 67a-15: The comment asks about the costs of the proposed restoration and planting activities.

Response to Comment 67a-15: Comment noted. Cost is not a CEQA issue and is therefore not discussed in the IS/MND.

Comment 67a-16: The comment asks about the basis for assuming the passive grassland will improve wildlife habitat in comparison to the existing condition.

Response to Comment 67a-16: Refer to Response to Comment 67a-5 and Section 3.4, *Biological Resources* of the IS/MND.

Comment 67a-17: The comment asks what the basis of design is for the mounded landforms and if the mounded landforms serve a restoration purpose.

Response to Comment 67a-17: The mounded landforms encircling the passive grassland areas would provide wind and aesthetic screening, visual interest, and would help define the upper and lower bowls of the site; the mounded landforms would not affect the restoration of the native grassland area.

Comment 67a-18: The comment expresses concern over the removal of parking.

Response to Comment 67a-18: The Proposed Project includes parking that is compliant with regulations to support the proposed park and community recreation center. Official parking will be provided onsite and along Obispo Road. The informal dirt lot on the Project site is not an official lot.

The purpose of the Proposed Project is to provide a needed neighborhood park in the community of El Granada. The comment does not identify an inadequacy or inaccuracy in the IS/MND.

Comment 67a-19: The comment expresses concern regarding stormwater runoff and the conversion of the wetland to a rain garden.

Response to Comment 67a-19: Refer to Response to Comment 50-5. No wetlands meeting the three-parameter USACE definition of a wetland or the LCP's definition of a wetland were determined to be present on site; thus, the Proposed Project would not result in the conversion of a wetland to a non-wetland use. Consistency with the LCP is described in Response to Comment 53-8. The installation of the rain garden would promote on-site infiltration and improve water quality.

Comment 67a-20: The comment states that more language is needed regarding the purview of the permits and approvals that are required, and this text should be added to the Permits and Approvals section of the IS/MND.

Response to Comment 67a-20: Comment noted. Refer to Response to Comment 50-5 for a discussion on wetlands. The permitting process would be conducted with the applicable federal, state, and local agencies and is a separate process from CEQA. Portions of the drainages on site that meet criteria as jurisdictional aquatic resources will be subject to state agency regulation. Refer to Response to Comment 69-1.

Comment 67a-21 The comment states that the listing of the San Mateo County General Plan policies is confusing.

Response to Comment 67a-21: The policies of the San Mateo General plan provide important and relevant regulatory setting information for the Proposed Project.

Comment 67a-22: The comment states that the Watershed and Hydrology section fails to acknowledge significant hydrologic features of the site including the seasonal wetland and the unnamed drainage. The comment also states that flow within Burnham Creek and the unnamed drainages were incorrectly classified.

Response to Comment 67a-22: The comment regarding the presence of wetlands is addressed in Response to Comment 50-5. Because the area did not meet the definition of a wetland, it was not considered an important hydrologic feature of the site. Burnham Creek and the unnamed drainage #2 are both intermittent. Unnamed drainage #1 is ephemeral. Refer to Section 3.10, *Hydrology and Water Quality* for a discussion on water quality and flow patterns.

Comment 67a-23: The comment states that the description of the climate is inaccurate in the IS/MND and expresses concerns that the section was not prepared by a qualified hydrologist.

Response to Comment 67a-23: According to the Bay Area Air Quality Management District (BAAQMD), San Mateo County receives an annual rainfall average of approximately 20 to 25 inches per year; however, the upper elevations may receive closer to 36 inches per year. Rainfall may vary within the County depending on the elevation. Edits to the IS/MND are presented in the Errata section at the conclusion of this memorandum.

Comment 67a-24: The comment states that IS/MND provides a poor analysis and potential of CRLF on the Project site.

Response to Comment 67a-24: The Biological Resources Report cites all special status species observations within the 9 quad search radius. Potential for special-status species to occur in the Project area and the potential for the Project to impact those species was thoroughly assessed. The likelihood California red-legged frog (*Rana draytonii*; CRLF) to occur in the Project area is not expected as potentially suitable aquatic habitat for this species would be confined to the Burnham Creek riparian corridor (which is outside the Project area), there is no continuous connectivity between aquatic and upland habitat or dense emergent vegetation in aquatic areas, and suitable breeding aquatic habitat with large ponds or pools with dense emergent vegetation (cattails and bushes) for concealment and attachment of eggs is absent from the Project area.

While CRLF have the potential to occur in riparian habitats within the vicinity of Project area (Burnham Creek; outside of Project area), the riparian areas associated with the hydrological features (unnamed drainage 1 and unnamed drainage 2) in the Project area are isolated as these drainages lack emergent vegetation (escape cover) and have been disconnected from the upper catchment areas and are culverted under El Granada. The Project site is surrounded by urban development, Highway 1, and other anthropomorphic disturbances (site routinely mowed in ruderal grassland area) and anthropomorphic disturbances and land use surrounding the Project area restricts and prevents species dispersal of CRLF to other aquatic and upland areas. The Project site does not support suitable key habitats components to support this species. Thus, limiting the potential for CRLF to occur within the Project area.

As stated in the Biological Resources Report (2023), the aquatic and upland habitats within the Project area are isolated with no continuous nor semi-continuous connection to known locations or suitable habitat areas for this species. The graveled parking lot within the Burnham Strip disconnects potential suitable aquatic habitat of Burnham Creek from any adjacent upland habitat.

The Project will maintain and/or enhance ecological conditions and there would be no significant impacts to biological resources within the Project area. Additionally, the IS/MND assesses the environmental impacts of the Proposed Project that are based on the environmental checklist provided in Appendix G of the CEQA Guidelines. Section 3.4, *Biological Resources* of the IS/MND includes an adequate discussion of the rationale used to determine the significance level of the Proposed Project's environmental impact for each checklist question. Implementation of BMPs during construction would minimize the potential for runoff, sediment, or hazardous materials to enter special-status habitat, and Mitigation Measures BIO-1, BIO-2, and BIO-3 would prevent potential impacts to special-status species and wildlife and their habitats during the Project. In addition, the IS/MND is in conformance with the applicable existing laws and standards established by federal, state, and local laws and ordinances.

Response to Comment 67a-25: The comment states that Mitigation Measures BIO-03 is inconsistent with the required nesting bird surveys by CDFW and full-time biological monitoring should be present for work within the riparian buffer areas.

Response to Comment 67a-25: Refer to the State Laws, Regulations, and Policies subsection with 3.4, *Biological Resources* for a description of the California Fish and Game Code. Mitigation Measure BIO-3 requires pre-construction nesting bird surveys prior to the initiation of Project activities in conformance with CDFW requirements. Implementation of Mitigation Measure BIO-4 would reduce potential impacts to the riparian area associated with construction; full-time biological monitoring was determined not be required.

Comment 67a-26: The comment states that the IS/MND does not adequately address the adverse effects to riparian habitats or sensitive natural communities, including the unnamed drainages, Burnham Creek, and wetlands on the Project site.

Response to Comment 67a-26:

Temporary and permanent impacts associated with the Proposed Project will be provided to the regulatory agencies during the permitting process. Any necessary mitigation requirements will be discussed with the regulatory agencies and included as permit conditions.

Refer to Response to Comment 50-5 for a discussion of wetlands. According to the San Mateo County LCP policy 7.14, a definition of a wetland follows the USACE three-parameter wetland definition and states that in San Mateo County, wetlands typically contain the following plants: cordgrass, pickleweed, jaumea, frankenia, marsh mint, tule, bullrush, narrow-leaf cattail, broadleaf cattail, pacific silverweed, salt rush, and bog rush. To qualify, a wetland must contain at least a 50% cover of some combination of these plants, unless it is a mudflat. The site assessment determined that the soils lacked evidence of hydric conditions and indicators of wetland hydrology were indeterminate. The wetland assessment did not find wetlands on site and concluded that wetter areas within the open field areas as unlikely to meet the definition of a wetland.

Below is a summary of the definition of sensitive habitats and riparian corridors according to the LCP.

- LCP policy 7.1 defines sensitive habitats as any area in which plant or animal life or their habitats are either rare or sensitive especially valuable and any area which meets one of the following criteria: (1) habitats containing or supporting “rare and endangered” species as defined by the State Fish and Game Commission, (2) all perennial and intermittent streams and their tributaries, (3) coastal tide lands and marshes, (4) coastal and offshore areas containing breeding or nesting sites and coastal areas used by migratory and resident water-associated birds for resting areas and feeding, (5) areas used for scientific study and research concerning fish and wildlife, (6) lakes and ponds and adjacent shore habitat, (7) existing game and wildlife refuges and reserves, and (8) sand dunes. Sensitive habitat areas include, but are not limited to, riparian corridors, wetlands, marine habitats, sand dunes, sea cliffs, and habitats supporting rare, endangered, and unique species.
- Sensitive habitats maps for the Coastal Zone designated under LCP policy 7.2 are shown on <https://www.smcgov.org/media/76831/download?inline=>
- LCP policy 7.7 defines riparian corridors by the “limit of riparian vegetation” (i.e., a line determined by the association of plant and animal species normally found near streams,

lakes, and other bodies of freshwater, including red alder, jaumea, pickleweed, big leaf maple, narrow-leaf cattail, arroyo willow, broadleaf cattail, horsetail, creek dogwood, black cottonwood, and box elder). Such a corridor must contain at least a 50% cover of some combination of the plants listed.

Unnamed drainage #1 is ephemeral and does not support riparian vegetation cover greater than 50% and would not be considered a sensitive habitat per LCP policy 7.1 or a riparian corridor per LCP 7.7. Additionally, per LCP policy 7.2, unnamed drainage #1 is not designated as a Sensitive Habitat.

Unnamed drainage #2 is intermittent and includes a portion of willows that would be considered a riparian corridor per LCP policy 7.7 and a sensitive habitat per LCP policy 7.1; however, the remainder of the drainage channel is lacking riparian vegetation. Per LCP policy 7.2, unnamed drainage #2 is not designated as a Sensitive Habitat.

Burnham Creek is riparian corridor per LCP policy 7.7 and would be considered a sensitive habitat per LCP policy 7.1. Per LCP policy 7.2, Burnham Creek is within the vicinity of the area shown to be a riparian habitat that is identified as “Damaged.”

For the reasons included above, the Proposed Project would not result in impacts to any wetlands on site. Impacts to sensitive habitats/riparian areas would occur along the unnamed drainage channel #2; however, impacts would be temporary, and implementation of Mitigation Measure BIO-4 would require replacement of native vegetation removed during construction. Additionally, the vegetated riparian area would be improved after Project completion. Additionally, direct impacts to the riparian area along Burnham Creek would be avoided.

Comment 67a-27: The comment states that the LCP’s definition of a wetland should not be relied upon and that the IS/MND should provide a preliminary plant palette and description of the habitat that will be created with implementation of the Proposed Project.

Response to Comment 67a-27: Refer to Response to Comment 50-5 and Response to Comment 67a-26. Revegetation activities would involve the use of native plants determined to be appropriate for the coastal zone of San Mateo County.

Comment 67a-28: The comment states that the IS/MND does not provide adequate information regarding the presence of wetlands on site.

Response to Comment 67a-28: Refer to Response to Comment 50-5.

Comment 67a-29: The comment states that the IS/MND fails to document the extent of wetlands that are under the regulatory purview of Porter-Cologne, as administered by the San Francisco Bay Regional Water Quality Control Board in Section 3.10, *Hydrology and Water Quality* of the IS/MND.

Response to Comment 67a-29: Refer to Response to Comment 50-5. Burnham Creek and the two unnamed drainages are subject to the Regional Water Quality Control Board (RWQCB) jurisdiction as waters of the state. Refer to Section 3.4, *Biological Resources* of the IS/MND.

Comment 67a-30: The comment states that the IS/MND does not mention the wetlands located on the Project site.

Response to Comment 67a-30: Refer to Response to Comment 50-5 and Response to Comment 67a-19. No wetlands were identified on site; thus, installation of the rain garden would not convert a wetland feature to a stormwater facility. The rain garden would promote on-site infiltration and improve water quality pursuant to the MRP.

Comment 67a-31: The comment states that the IS/MND does not include any information regarding the regulatory process that may affect the outcome of the Project.

Response to Comment 67a-31: The Proposed Project would be required to comply with all applicable federal, state, and local permits. Mitigation requirements for impacts to jurisdictional waters and habitats will be determined during the regulatory process and included as permit conditions. Regulatory permits are a necessary component for projects occurring in jurisdictional areas. Although linked, the regulatory process is a separate process from CEQA.

Comment 67a-32: The comment expresses concerns that the rain garden is not evaluated regarding surface water runoff and stormwater management.

Response to Comment 67a-32: Refer to Response to Comment 50-5 and Response to Comment 67a-19. No wetlands were identified on site; thus, installation of the rain garden would not convert a wetland feature to a stormwater facility. The rain garden would promote on-site infiltration and improve water quality pursuant to the MRP.

Comment 67a-33: The comment states that the incorrect scientific name is listed for pallid bat in Section 3.21, *Mandatory Findings of Significance*.

Response to Comment 67a-33: The error of mislabeling the scientific name of Pallid bat in Section 3.21, *Mandatory Findings of Significance* was corrected. Edits to the IS/MND are presented in the Errata to the IS/MND section at the conclusion of this memorandum.

Comment Letter 67b–

Comment 67b-1: This comment lists a timeline of wetland evaluations conducted for the Burnham Strip and expresses concerns regarding the presence of wetlands and the inclusion of a rain garden.

Response to Comment 67b-1: Refer to Response to Comment 50-5 and Response to Comment 67a-19.

Comment 67b-2: This comment reviews the Wetland Delineation prepared by the RCD in 2021.

Response to Comment 67b-2: The comment does not identify an inadequacy or inaccuracy in the IS/MND.

Comment Letter 68–

Comment 68-1: This comment expresses concerns regarding parking. Additionally, the comment expresses a desire for additional park components instead of the proposed walking trails.

Response to Comment 68-1: The Proposed Project includes parking that is compliant with regulations to support the proposed park and community recreation center. Official parking will be provided on-site and along Obispo Road. GCSO under guidance from the Board determined that

there is a need for the Park facilities and services proposed under the Proposed Project. Public input on the Project components was received during the public outreach process.

Comment Letter 69–

Comment 69-1: The Regional Water Quality Control Board (RWQCB) provides general information about the various regulations and permits that may be required and states that a jurisdictional delineation should be conducted to fully identify all jurisdictional features at the Project site.

Response to Comment 69-1: GCSO appreciates the RWQCB's support for the Project and future input to avoid and reduce impacts waters of the state through the 401 Certification and Waste Discharge Requirements process. GCSO acknowledges a 401 Certification will be required for impacts to Burnham Creek, the unnamed intermittent drainage, and the unnamed ephemeral drainage, which are also subject to U.S. Army Corps of Engineers (USACE) jurisdiction under CWA Section 404. As part of the Section 404 permitting process, GCSO would prepare and submit an aquatic resources [wetland] delineation as part of the permit application submittal. This wetland delineation would include and map all potential jurisdictional waters and wetlands within the Project area.

GCSO would like to note that existing surface water features (i.e., Burnham Creek, the unnamed intermittent drainage, and the unnamed ephemeral drainage) were considered during the Project design process. The Project avoids the existing densely vegetated riparian area around the Burnham Creek riparian zone. The existing intermittent and ephemeral drainage channels were incorporated into Project designs and would be widened and realigned to increase sinuosity, allowing for more water percolation and filtration, and planted with native riparian species to create a robust and dynamic vegetation zone. This zone would be fenced off to prevent parks visitors from accessing the drainage channels. Overall, the Project would increase the ecological value and natural processes of the existing waters of the state.

Comment Letter 70–

Comment 70-1: This comment expresses a desire to keep the preschool open.

Response to Comment 70-1: The preschool facility is currently operating with an expiring lease agreement and would no longer be operating at the site regardless of the approval of the Proposed Project. The comment does not identify an inadequacy or inaccuracy in the IS/MND.

Comment Letter 71–

Comment 71-1: The comment states that the Project would remove an existing dirt lot that is unofficially used as a parking lot and requests an estimation for the number of existing parking spaces and the anticipated net change in public parking opportunities. The comment also requests that any temporary impacts to parking and coastal access are described and if parking would require a fee.

Response to Comment 71-1: As described in the comment, the Proposed Project would provide over 110 parking spaces on the Project site and along Obispo Road, which would be compliant with regulations to support the proposed park and community recreation center. The informal dirt lot on the Project site is not an official lot and therefore estimating the number of unofficial spots is

difficult given that parking is haphazard and inconsistent on the unofficial lot. Although the Proposed Project would remove unofficial parking within the area, it would replace that parking with official and legal public parking, more than what is currently possible. The Project would not contribute to an overall cumulative reduction in legal parking in the community of El Granada.

Construction activities would temporarily impact available parking in the area; however, these impacts would be short-term and would cease once construction is completed. Parking along Highway 1 and portions of Obispo Road will still be available during this time to coastal visitors. Coastal access would not be impacted during construction.

Parking onsite is not proposed to require a fee.

Comment 71-2: The comment requests that the Project is consistent with LCP policies 8.6, 8.9, 8.15, 8.17, and 8.23.

Response to Comment 71-2: Only inconsistencies with applicable plans is required to be analyzed. No analysis is required if the project is consistent with relevant plans. (*Stop Syar Expansion v. County of Napa* (2021) 63 Cal.App.5th 444, 460; *The Highway 68 Coalition v. County of Monterey* (2017) 14 Cal.App.5th 883, 894.). However, consistency with the LCP policies is summarized below.

- LCP policy 8.6 requires setbacks from streams and other natural waterways, prohibits development that would adversely affect the visual quality of streams and riparian habitat, ensures that open natural views of estuaries and beaches are retained, and intact wetlands are retained. This policy was added to Section 3.4, *Biological Resources* of the IS/MND. Edits to the IS/MND are presented in the Errata to the IS/MND section at the end of this memorandum.
- LCP policy 8.9 governs trees and tree removal, which are not included as part of the Proposed Project and thus is not applicable to the Project and was not included in the IS/MND.
- LCP policy 8.15 prevents development from substantially blocking views along the shoreline. This policy was added to Section 3.1, *Aesthetics*. Edits to the IS/MND are presented in the Errata to the IS/MND section at the end of this memorandum.
- LCP policy 8.17 requires regulations regarding altering landforms due to grading and new roads. The Project includes minimal grading; however, it does not include the creation of new roads. This policy was added to Section 3.1, *Aesthetics*. Edits to the IS/MND are presented in the Errata to the IS/MND section at the end of this memorandum.
- LCP policy 8.23 requires that new utilities lines are installed underground in County scenic corridors. All new utilities onsite would be undergrounded. This policy was added to Section 3.1, *Aesthetics*. Edits to the IS/MND are presented in the Errata to the IS/MND section at the end of this memorandum.

Comment 71-3: The comment states to confirm the applicable LCP-required buffer zones for both drainage features and include an exhibit which clearly delineates the riparian areas and applicable buffer zones.

Response to Comment 71-3: LCP policy 7.7 defines riparian corridors by the “limit of riparian vegetation” (i.e., a line determined by the association of plant and animal species normally found near streams, lakes and other bodies of freshwater including red alder, jaumea, pickleweed, big leaf maple, narrow-leaf cattail, arroyo willow, broadleaf cattail, horsetail, creek dogwood, black cottonwood, and box elder). Such a corridor must contain at least a 50% cover of some combination of the plants listed.

LCP policy 7.11 requires “on both sides of the corridors, from the limit of riparian vegetation, extend buffer zones 50 feet outward for perennial streams and 30 feet outward for intermittent streams. Where no riparian vegetation exists along both sides of riparian corridors, extend buffer zones 50 feet from the predictable high-water line for perennial streams and 30 feet from the midpoint of intermittent streams.”

Unnamed drainage #1 is ephemeral and does not support riparian vegetation cover greater than 50% and would not be considered a sensitive habitat per LCP policy 7.1 or a riparian corridor per LCP policy 7.7. Per LCP policy 7.2, unnamed drainage #1 is not designated as a sensitive habitat. Per LCP policy 7.11, an establishment of a buffer zone would not be applicable as unnamed drainage #1 is ephemeral and would not qualify as riparian corridor.

Unnamed drainage #2 is intermittent with a portion containing willows that would be considered riparian corridor per LCP policy 7.7 and sensitive habitat per LCP policy 7.1. However, the remainder of the unnamed drainage channel #2 is lacking riparian vegetation that would be considered a riparian corridor under LCP policy 7.7 or a sensitive habitat per LCP policy 7.2. Per LCP policy 7.11, unnamed drainage #2 would extend a buffer zone of 30 feet outward from predictable high-water line for intermittent streams within the willow area of the unnamed drainage area.

Comment 71-4: The comment requests information on the work proposed within the riparian buffer zone as defined by LCP policy 7.11 for Burnham Creek.

Response to Comment 71-4: Burnham Creek is a riparian corridor per LCP policy 7.7 and would be considered a sensitive habitat per LCP policy 7.1. Per LCP policy 7.2, Burnham Creek is within the vicinity of the area shown to be a riparian habitat that is identified as “Damaged” and not “Primary” as shown in the LCP Midcoast Sensitive Habitats Map:

<https://www.smcgov.org/media/76831/download?inline=>

LCP policy 7.9 states that permitted uses in riparian corridors include trails and scenic overlooks on public land.

Per LCP policy 7.11, buffer zones extend 30 feet outward from the predictable high-water line for intermittent streams or from the limit of riparian vegetation. LCP policy 7.12 states that permitted uses in buffer zones may include uses permitted in riparian corridors or parcels designated on the LCP Land Use Plan Map as agriculture, open space, or timber production, residential structures, or impervious surfaces if no feasible alternative exists. According to the LCP Map 1.4- Midcoast Land Use Plan, the Project area is designated as “Open Space with Park Overly” and Burnham Creek is designated as “Open Space.”

Within the riparian corridor and riparian buffer zone of Burnham Creek, the Proposed Project would install a permeable trail along the roadway edge. Trails are a permitted use in both the riparian corridor and buffer zone as defined by the LCP.

Comment 71-5: The comment states to clarify the type and extent of work proposed within riparian corridors, and within LCP-required riparian buffer areas.

Response to Comment 71-5: Refer to Response to Comment 71-4.

Comment 71-6: The comments states to clarify the statement “Revegetation would account for approximately 45% of riparian vegetation species that are listed in the LCP” (Page 3-43).

Response to Comment 71-6: This sentence was revised to provide more clarity. Edits to the IS/MND are presented in the Errata to the IS/MND section at the end of this memorandum.

Comment 71-7: The comment requests confirmation that the presence of wetlands was evaluated against the LCP wetland definition in LCP Policy 7.14.

Response to Comment 71-7: Horizon (Montrose) biologists, including a USACE-certified wetland delineator, conducted a site visit on March 16, 2023 to characterize biological resources at the Project site. The findings from that visit were mostly consistent with the Biological Resources Assessment (BRA) from BioMaAS in 2020. The site supported non-native annual grassland/ruderal habitat. Irisleaf rush (*Juncus xiphodes*) was observed growing in several areas as a characteristic species at the site. Sample pits were dug at these locations to examine soils to see if hydric conditions (e.g., depleted soils, redox reactions, sulfate reduction, or organic matter accumulation) were present. No hydric soils were observed. Thus, these areas did not meet the USACE three-parameters definition (i.e., hydrophytic vegetation, wetland hydrology, and hydric soils) to be classified as a wetland.

A wetland assessment conducted by the RCD (2021) evaluated potential wetlands in the Project area. The assessment observed hydrophytic plants, such as silverweed cinquefoil (*Potentilla anserina*) and common rush (*Juncus patens*), but at a percent cover that was lower in meeting the necessary criteria for wetland vegetation. The San Mateo County LCP’s definition of a wetland follows the USACE three-parameter wetland definition and further state that in San Mateo County, wetlands typically contain the following plants: cordgrass, pickleweed, jaumea, frankenia, marsh mint, tule, bullrush, narrow-leaf cattail, broadleaf cattail, pacific silverweed, salt rush, and bog rush. To qualify, a wetland must contain at least a 50% cover of some combination of these plants, unless it is a mudflat. Additionally, the assessment determined soils lacked evidence of hydric conditions and indicators of wetland hydrology were indeterminate. The wetland assessment did not find wetlands on site and concluded that wetter areas within the open field areas as unlikely to be meet the definition of a wetland.

Previous and current anthropomorphic activities have generally reduced the habitat quality at the Project site resulting in non-native annual grassland/ruderal vegetation as the dominant habitat. Factors include pressures from the highly urbanized environment surrounding the site, row crop farming in the 1990’s, significant earthmoving during the construction of Highway 1, and the construction of an underground sewer wet weather storage facility retention basin.

The Proposed Project would improve and enhance two existing onsite drainage channels to create a natural area and expand and improve onsite vegetation. Including a rain garden within the Project's Green infrastructure would promote on-site infiltration and improve water quality pursuant to the Municipal Regional Stormwater NPDES Permit for Phase I municipalities and agencies in the San Francisco Bay Area (Order R2-2022-0018) (MRP). Additionally, the Proposed Project would include vegetation management and invasive species eradication to restore native perennial grasses and forbs, enhancing habitat and foraging for native wildlife within proposed park. Proposed work within the limits of existing riparian vegetation would be avoided with the exception of installing a new free span pedestrian bridge over the unnamed drainage channel. The Proposed Project would result in increased habitat quality and function compared to the existing conditions of Burnham Strip. In addition, GCSO would install a permeable trail extending from the Coronado Street crosswalk to Obispo Road, and along the Obispo Road shoulder to the central portion of the site. This trail is along the roadway edge and is mostly in disturbed and/or ruderal areas and would not directly impact Burnham Creek.

Temporary and permanent impacts associated with the Proposed Project will be provided to the regulatory agencies during the permitting process. Any necessary mitigation requirements will be discussed with the regulatory agencies and included as permit conditions.

According to the San Mateo County LCP policy 7.14, a definition of a wetland follows the USACE three-parameter wetland definition and states that in San Mateo County, wetlands typically contain the following plants: cordgrass, pickleweed, jaumea, frankenia, marsh mint, tule, bullrush, narrow-leaf cattail, broadleaf cattail, pacific silverweed, salt rush, and bog rush. To qualify, a wetland must contain at least a 50% cover of some combination of these plants, unless it is a mudflat. The site assessment determined that the soils lacked evidence of hydric conditions and indicators of wetland hydrology were indeterminate. The wetland assessment did not find wetlands on site and concluded that wetter areas within the open field areas as unlikely to meet the definition of a wetland.

Below is a summary of the definition of sensitive habitats and riparian corridors according to the LCP.

- LCP policy 7.1 defines sensitive habitats as any area in which plant or animal life or their habitats are either rare or sensitive especially valuable and any area which meets one of the following criteria: (1) habitats containing or supporting "rare and endangered" species as defined by the State Fish and Game Commission, (2) all perennial and intermittent streams and their tributaries, (3) coastal tide lands and marshes, (4) coastal and offshore areas containing breeding or nesting sites and coastal areas used by migratory and resident water-associated birds for resting areas and feeding, (5) areas used for scientific study and research concerning fish and wildlife, (6) lakes and ponds and adjacent shore habitat, (7) existing game and wildlife refuges and reserves, and (8) sand dunes. Sensitive habitat areas include, but are not limited to, riparian corridors, wetlands, marine habitats, sand dunes, sea cliffs, and habitats supporting rare, endangered, and unique species.
- Sensitive habitats maps for the Coastal Zone designated under LCP policy 7.2 are shown on <https://www.smcgov.org/media/76831/download?inline=>

- LCP policy 7.7 defines riparian corridors by the “limit of riparian vegetation” (i.e., a line determined by the association of plant and animal species normally found near streams, lakes, and other bodies of freshwater, including red alder, jaumea, pickleweed, big leaf maple, narrow-leaf cattail, arroyo willow, broadleaf cattail, horsetail, creek dogwood, black cottonwood, and box elder). Such a corridor must contain at least a 50% cover of some combination of the plants listed.

Unnamed drainage #1 is ephemeral and does not support riparian vegetation cover greater than 50% and would not be considered a sensitive habitat per LCP policy 7.1 or a riparian corridor per LCP 7.7. Additionally, per LCP policy 7.2, unnamed drainage #1 is not designated as a Sensitive Habitat.

Unnamed drainage #2 is intermittent and includes a portion of willows that would be considered a riparian corridor per LCP policy 7.7 and a sensitive habitat per LCP policy 7.1; however, the remainder of the drainage channel is lacking riparian vegetation. Per LCP policy 7.2, unnamed drainage #2 is not designated as a Sensitive Habitat.

Burnham Creek is riparian corridor per LCP policy 7.7 and would be considered a sensitive habitat per LCP policy 7.1. Per LCP policy 7.2, Burnham Creek is within the vicinity of the area shown to be a riparian habitat that is identified as “Damaged.”.

For the reasons included above, the Proposed Project would not result in impacts to any wetlands on site. Impacts to sensitive habitats/riparian areas would occur along the unnamed drainage channel #2; however, impacts would be temporary and implementation of Mitigation Measure BIO-4 would require replacement of native vegetation removed during construction. Additionally, the vegetated riparian area would be improved after Project completion. Additionally, direct impacts to the riparian area along Burnham Creek would be avoided.

Comment 71-8: The comment The comment expresses concern over sea level rise and potential impacts to the Project site.

Response to Comment 71-8: Refer to Response to Comment 53-11. GCSD acknowledges that the coastal development permit (CDP) application will need to describe any sea level risks to the Project and the Project’s compatibility or incompatibility with the adaptation planning for Highway 1.

Comment Letter 72 –

Comment 72-1: The comment expresses a desire to maintain the unofficial parking and skateboard ramp onsite.

Response to Comment 72-1: The Proposed Project would provide official parking on site and along Obispo Road. The informal dirt lot on the Project site is not an official lot. The existing skateboard ramp would be relocated but would remain on site.

Comment Letter 73 –

Comment 73-1: The comment expresses a desire to maintain the free, unofficial parking onsite.

Response to Comment 73-1: The Proposed Project would provide official parking onsite and along Obispo Road. The informal dirt lot on the Project site is not an official lot. No fee is proposed to be required for parking.

Comment Letter 74–

Comment 74-1: The comment expresses opposition to the Project due to an increase in traffic and potential utility and services disruptions associated with implementation of the Proposed Project.

Response to Comment 74-1: Refer to Response to Comment 44c-3 for a discussion of potential traffic related impacts. The Proposed Project would provide a needed neighborhood park to the local community of El Granada. The IS/MND determined that the existing utilities and service systems would adequately serve the demand of the Proposed Project. Thus, implementation of the Proposed Project would not result in a significant impact to existing utilities and service systems (refer to Section 3.19, *Utilities and Service Systems* of the IS/MND).

Comment Letter 75–

Comment 75-1: The comment expresses a desire to maintain the unofficial parking and skateboard ramp onsite.

Response to Comment 75-1: Refer to Response to Comment 72-1.

Comment Letter 76–

Comment 76-1: The comment expresses support for removing all parking along Highway 1 and also recommends replacing the stop light at Coronado Avenue and Highway 1 with a roundabout.

Response to Comment 76-1: Comment noted.

Comment Letter 77–

Comment 77-1: This comment expresses concerns over the loss of parking and that the Proposed Project should incorporate a large beach parking lot.

Response to Comment 77-1: Comment noted. The Proposed Project would provide official parking onsite and along Obispo Road. The informal dirt lot on the Project site is not an official lot.

Comment Letter 78–

Comment 78-1: The comment expresses a desire to maintain the unofficial parking and skateboard ramp onsite.

Response to Comment 78-1: Refer to Response to Comment 72-1.

Comment Letter 79–

Comment 79-1: The comment expresses support for the Proposed Project.

Response to Comment 79-1: Comment noted.

Comment Letter 80–

Comment 80-1: The comment expresses support for the Proposed Project.

Response to Comment 80-1: Comment noted.

Comment Letter 81–

Comment 81-1: This comment states that the Proposed Project will negatively impact available parking and access to the beach and the preschool.

Response to Comment 81-1: The Proposed Project would provide official parking onsite and along Obispo Road. The informal dirt lot on the Project site is not an official lot. The purpose of the Proposed Project is to provide a needed neighborhood park in the community of El Granada. The preschool facility is currently operating with an expiring lease agreement and would no longer be operating at the site regardless of the approval of the proposed project.

Comment Letter 82–

Comment 82-1: This comment expresses concerns over the removal of the Surfer’s beach parking lot.

Response to Comment 82-1: The Proposed Project includes parking that is compliant with regulations to support the proposed park and community recreation center. Official parking will be provided onsite and along Obispo Road. The informal dirt lot on the Project site is not an official lot.

Comment Letter 83–

Comment 83-1: This comment expresses concerns regarding the reduction in available parking and the high cost of the Proposed Project.

Response to Comment 83-1: The informal dirt lot on the Project site is not an official lot. The Proposed Project includes parking that is compliant with regulations to support the proposed park and community recreation center. Official parking will be provided onsite and along Obispo Road. Additionally, Project cost is not a CEQA issue and is therefore not discussed in the IS/MND.

Comment Letter 84a–

Comment 84a-1: The comment letter mentions the need for a lawsuit and expresses concerns over noise from the events, lack of enforcement, and parking.

Response to Comment 84a-1: Comment noted. Refer to Response to Comment 53-4 for a discussion of noise. GCSO will be responsible for enforcing noise regulations. The informal dirt lot on the Project site is not an official lot. Official parking will be provided onsite and along Obispo Road.

Comment Letter 84b–

Comment 84b-1: The comment states opposition to the community center and events and the reduction in available parking.

Response to Comment 84b-1: Comment noted. Refer to Response to Comment 84a-1.

Comment Letter 85–

Comment 85-1: This comment expresses a desire to keep the preschool open and is concerned with the lack of preschools along the coast.

Response to Comment 85-1: The preschool facility is currently operating with an expiring lease agreement and would no longer be operating at the site regardless of the approval of the Proposed Project.

Comment Letter 86–

Comment 86-1: This comment expresses concern over the loss of parking for surfers.

Response to Comment 86-1: The informal dirt lot on the Project site is not an official lot. The Proposed Project includes parking that is compliant with regulations to support the proposed park and community recreation center.

Comment Letter 87–

Comment 87-1: The comment expresses support for the Proposed Project.

Response to Comment 87-1: Comment noted.

Comment Letter 88–

Comment 88-1: The comment expresses support for the Proposed Project.

Response to Comment 88-1: Comment noted.

Comment Letter 89–

Comment 89-1: The comment expresses opposition to the Proposed Project as it would draw more visitors to the area and increase traffic.

Response to Comment 89-1: Refer to Response to Comment 44c-3. The goal of the Proposed Project is to provide a needed neighborhood park to the local community of El Granada.

Comment Letter 90–

Comment 90-1: The comment requests GCSO to provide the frequency and capacity estimations for the potential proposed events at the plaza, Village Green lawn area, and community recreation center.

Response to Comment 90-1: It is estimated that special events within the plaza and Village Green lawn area would typically occur no more than two times per month, with increased frequency in the summer, up to three or four times per month. The frequency of special events at the community recreation center are estimated to occur three to four times per month on the weekend and two to

three times per week on weekdays The capacity estimates for events are unknown at this time; however, GCSD will work with the County during the permit application process.

Comment 90-2: The comment requests elevations, renderings and/or visual illustrations of the proposed buildings and structures to support the aesthetics impacts.

Response to Comment 90-2: As described in Section 3.1, *Aesthetics* of the IS/MND, all proposed structures would be limited to a single story and would be consistent with the height of the existing structure onsite and with the surrounding area. Appendix A of the IS/MND includes the Proposed Project's design plans. Additional needed plans and renderings will be provided to the County during the permit application process.

Comment 90-3: The comment states that the IS/MND is unclear if it is consistent with LCP policies 7.9, 7.11, and 7.12 and that the Proposed Project must comply with the LCP's Sensitive Habitat Component. The comment also states that the IS/MND should include a figure showing the riparian area and buffer zones.

Response to Comment 90-3: Refer to Response to Comment 67a-26 and Response to Comment 71-4 for a consistency determination on LCP policies 7.9, 7.11, and 7.12. GCSD will work closely with the County during the permit application process to ensure consistency with the LCP.

Comment 90-4: The comment states that the IS/MND should clarify whether the use of the term "riparian" is consistent with LCP policy 7.7 and what design measures the Project will include to prevent human disturbance and pollution to riparian areas, drainage channels, and creeks.

Response to Comment 90-4: The definition of "riparian" that was used in the IS/MND includes vegetation along hydrologic features and thus, is consistent with LCP policy 7.7 which defines riparian corridors as the "limit of riparian vegetation" (i.e., a line determined by the association of plant and animal species normally found near streams, lakes and other bodies of freshwater including red alder, jaumea, pickleweed, big leaf maple, narrow-leaf cattail, arroyo willow, broadleaf cattail, horsetail, creek dogwood, black cottonwood, and box elder). Per LCP policy 7.7, a riparian corridor must contain at least a 50% cover of some combination of the plants listed above. Refer to Response to Comment 67a-26 and Response to Comment 71-3.

To reduce potential impacts to water quality during construction, Mitigation Measures WQ-1, GEO-1, and HAZ-1 would be implemented which require the implementation of a Storm Water Pollution Prevention Plan (SWPPP), and erosion control measures, and would ensure that water quality would not be degraded by materials used during construction.

Implementation of the Proposed Project would widen and realign the existing drainage channels to increase sinuosity, allowing for more water percolation and filtration, and planted with native riparian species to create a robust and dynamic vegetation zone. This zone would be fenced off to prevent parks visitors from accessing the drainage channels and riparian areas. Overall, the Project would increase the ecological value and natural processes of the existing waters and vegetation onsite.

Comment 90-5: The comment states that the IS/MND should evaluate consistency with the relevant noise policies of Chapter 16 of the San Mateo County General Plan.

Response to Comment 90-5: The Proposed Project would comply with the San Mateo County Noise Ordinance and the relevant San Mateo County General Plan noise policies. The relevant noise policies of Chapter 16 of the San Mateo County General Plan were added to Section 3.13, *Noise* of the IS/MND. Edits to the IS/MND are presented in the Errata to the IS/MND section at the end of this memorandum.

Comment 90-6: The comment requests that the Project minimize encroachment into the County's right-of-way (ROW) and states that the IS/MND should include a more detailed description of the encroachment.

Response to Comment 90-6: Encroachment into the County's ROW along Obispo Road was minimized to the extent feasible during Project design and balances the needs of providing public access along the Project site. GCSD will work closely with the County and provide necessary exhibits during the permit application process.

Comment 90-7: The comment states that the Proposed Project would remove public parking and add parking within the County ROW. The comment requests clarification on the number of existing and proposed parking spaces.

Response to Comment 90-7: Refer to Response to Comment 71-1. The Project does not rely on parking along Highway 1. GCSD will work closely with the County during the permit application process.

Comment 90-8: The comment expresses concern regarding estimating the vehicle trips for the Proposed Project based on visitor data for Quarry Park.

Response to Comment 90-8: The analysis included in the IS/MND is consistent with OPR guidelines regarding VMT per Senate Bill 743 (Vehicles Miles Traveled Policy). Creating a community park and recreation center would serve the local underserved community and would not result in a VMT-producing land use. Based on visitor counts from the nearby Quarry Park, it is assumed that the Proposed Project would generate a similar number of trips per day (approximately 90 trips) which would be below the Office of Planning and Research (OPR) threshold of 110 trips per day. Additionally, the Proposed Project would add a previously non-existent amenity to the El Granada Community, which would reduce the miles traveled by residents that would previously need to travel to adjacent communities to access similar recreational resources, thereby reducing overall regional VMT. Furthermore, the Proposed Project's approach to analyzing VMT related impacts was confirmed to be consistent with the OPR Technical Advisory by Caltrans per Comment Letter 61. Caltrans stated that "Per the IS/MND, this project is found to have a less than significant VMT impact, therefore working towards meeting the State's VMT reduction goals."

Comment 90-9: The comment requests clarification on whether the Coastside Fire Protection District (CFPD) has reviewed the Project and if the Project would affect CFPD operations.

Response to Comment 90-9: CFPD will provide fire protection services to the Project site. Mitigation Measure TR-1 requires coordination with CFPD during construction to avoid potential affects to CFPD operations. No comment letters from the CFPD were received during the public comment period.

ERRATA

The following revisions are hereby made to the IS/MND at the specified locations in response to comments discussed above. Underlined text is added; ~~strikeout~~ text is deleted.

Chapter 2, *Project Description*

On page 2-6, the following text was updated:

In the northwestern most section of the proposed park, the District proposes to renovate and expand upon the existing ±3,000 square foot preschool building, located near the intersection of Avenue Alhambra, San Luis Avenue, Coronado Street and Obispo Road, to develop a new Community Recreation Center. The building was acquired by the District in July 2021 and is leased to the preschool until ~~August~~ May 2025.

On page 2-8, the following text was added:

Park. Hours of operation for the park would be daily from dawn to dusk. The restrooms would be closed each evening by District staff or contracted security and opened each morning, or timed locks would be installed.

On page 2-10, the following text was revised:

Installation/replacement of fencing along a portion of the western edge of the site and proposed dog park and around the play area for safety.

Chapter 3, *Environmental Checklist*

Section 3.1, *Aesthetics*

On page 3-9, the following LCP policies were added:

- Policy 8.15 Coastal Views. Prevent development (including buildings, structures, fences, unnatural obstructions, signs, and landscaping) from substantially blocking views to or along the shoreline from coastal roads, roadside rests and vista points, recreation areas, trails, coastal accessways, and beaches.
- Policy 8.17 Alteration of Landforms; Roads and Grading.
 - a) Require that development be located and designed to conform with, rather than change, landforms. Minimize the alteration of landforms as a consequence of grading, cutting, excavating, filling or other development.
 - b) To the degree possible, ensure restoration of pre-existing topographic contours after any alteration by development, except to the extent necessary to comply with the requirements of Policy 8.18.
 - c) Control development to avoid the need to construct access roads visible from State and County Scenic Roads. Existing private roads shall be shared wherever possible. New access roads may be permitted only where it is demonstrated that use of existing roads is physically or legally impossible or unsafe. New roads shall be (1) located and designed to minimize visibility from State and County

Scenic Roads and (2) built to fit the natural topography and to minimize alteration of existing landforms and natural characteristics.

This provision does not apply to agricultural development to the extent that application of the provision would impair any agricultural use or operation, or convert agricultural soils. In such cases, build new access roads to minimize alteration of existing landforms and natural characteristics.

On page 3-10, the following LCP policy was added:

- Policy 8.23 Utilities in County Scenic Corridors
 - a) Install new distribution lines underground, except as provided in b.
 - b) For all development, exceptions may be approved by the Planning Commission when: (1) it is not physically practicable due to topographic features, (2) there are agricultural land use conflicts, or (3) development is for farm-labor housing. In addition, for building permits, exceptions may be approved by the Planning Commission for financial hardships. In each case, however, utilities shall not be substantially visible from any public road or developed public trail.

Because the Project site is located within the Urban Rural Boundary of the Midcoast Land Use Plan, on page 3-10 the following text was deleted to remove reference to Policy 8.31, Regulation of Scenic Corridors in Rural Areas

~~Policy 8.31 Regulation of Scenic Corridors in Rural Areas~~

- ~~a) Apply the policies of the Scenic Road Element of the County General Plan.~~
- ~~b) Apply Section 6325.1 (Primary Scenic Resources Areas Criteria) of the Resource Management (RM) Zoning District as specific regulations protecting scenic corridors in the Coastal Zone.~~
- ~~c) Apply the Rural Design Policies of the LCP.~~
- ~~d) Apply the Policies for Landforms and Vegetative Forms of the LCP.~~
- ~~e) Require a minimum setback of 100 feet from the right-of-way line, and greater where possible; however, permit a 50-foot setback when sufficient screening is provided to shield the structure from public view.~~
- ~~f) Continue applying special regulations for the Skyline Boulevard and Cabrillo Highway State Scenic Corridors.~~
- ~~g) Enforce specific regulations of the Timber Harvest Ordinance which prohibits the removal of more than 50% of timber volume in scenic corridors.~~

On page 3-12, the following text was revised:

Additionally, the Project would construct a new 3,000 square foot building connected via trellis to the existing structure. The addition of these structures to the viewshed would be visually consistent with other single-story structures in the area.

In Table 3.1-1 on page 3-13, the following LCP policies and consistency determination was added:

<u>Policy 8.15 Coastal Views</u>	<u>The Project would be consistent with this policy as it would involve uses that are consistent with the surrounding area; the park and proposed facilities would not block coastal views.</u>
<u>Policy 8.17 Alteration of Landforms; Roads and Grading</u>	<u>The Project would be consistent with this policy as it would involve minor grading that would not substantially change the existing flat topography of the site. In addition, no new roads would be created.</u>
<u>Policy 8.23 Utilities in County Scenic Corridors</u>	<u>The Project would be consistent with this policy as it would not incorporate new overhead utilities in a County scenic corridor.</u>

In Table 3.1-1 on page 3-14, the following text referencing Policy 8.31 was deleted:

<u>Policy 8.31 Regulation of Scenic Corridors in Rural Areas</u>	The Project would be consistent to these referenced policies and would be subject to County review and approval during permit applications.
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Section 3.3, Air Quality

On page 3-22, the following text was revised:

The Project site is located in the SFBAAB in San Mateo County along inland creeks that flow into the Pacific Ocean. ~~San Francisco Bay~~.

On page 3,23, the following text was revised:

As shown in Table 3.3-3 ~~Error! Reference source not found.~~, the estimated construction-related emissions associated with the proposed Project would be less than these mass emissions significance thresholds for all pollutants.

Section 3.4, Biological Resources

On page 3-34, the following text was revised:

Policy 7.3 Protection of Sensitive Habitats

- a) Prohibit ~~and~~ land use or development which would have significant adverse impact on sensitive habitat areas.

On page 3-37, the following LCP policy was added to the regulatory setting:

- Policy 8.6 Streams, Wetlands, and Estuaries
 - a. Set back development from the edge of streams and other natural waterways a sufficient distance to preserve the visual character of the waterway.
 - b. Prohibit structural development which will adversely affect the visual quality of perennial streams and associated riparian habitat, except for those permitted by Sensitive Habitats Component Policies.
 - c. Retain the open natural visual appearance of estuaries and their surrounding beaches.
 - d. Retain wetlands intact except for public accessways designed to respect the visual and ecological fragility of the area and adjacent land, in accordance with the Sensitive Habitats Component policies.

On page 3-37, the following text was revised:

In addition, an approximately 400,000-gallon passive underground sewer wet weather storage facility retention basin lies beneath a portion of the study area.

On page 3-39, the following text was revised:

Although suitable roosting habitat may be present in the vicinity of the proposed Project, it would not be directly impacted by proposed Project activities; however, indirect impacts to bat species may occur.

On page 3-41, the following text was revised:

Implementation of Mitigation Measure BIO-2 3 would minimize impacts to nesting birds protected by the MBTA by requiring pre-construction surveys and establishment of non-disturbance buffers around active raptor nests.

On page 3-43, the following text was revised:

Revegetation around the two ditches will provide ecological function such as habitat substrate and refugia for birds and other wildlife. Revegetation would ~~account for~~ approximately 45% of be conducted with riparian vegetation species that are listed in the LCP.

Section 3.5, Cultural Resources

On page 3-49, the following text was revised:

Letters were sent to each contact on June 21, 2023, to elicit any concerns or information regarding any known tribal cultural resources within the project area. Coordination with

tribes is described further in Section 3.18, Tribal Cultural Resources ~~Error! Reference source not found, "Error! Reference source not found.~~

On page 3-49, the following text was revised:

Further, the proposed Project actions would not demolish this property and it would be incorporated into the park plans.

Section 3.6, Energy

On page 3-54, Table 3.6-1 was printed twice and the duplicative table was deleted.

Section 3.7, Geology, Soils, and Seismicity

On page 3-62, the following typo was fixed:

In addition, Mitigation Measure GEO-1 would ensure that erosion is minimized through compliance with San Mateo County's "Erosion and Sediment Control Plan Requirements" and in accordance with the erosion control plan, including long-term drainage control, placement of erosion control mats, and seeding following construction; this would include limitations and restrictions included in the County's wet season grading moratorium.

Section 3.9, Hazards and Hazardous Materials

On page 3-77, the following significance conclusion was bolded to be consistent with the rest of the document.

It is anticipated that the Project would reduce the potential risk to people and property from wildfire and the Project would have a **less than significant impact** from increased fire hazard.

Section 3.10, Hydrology and Water Quality

On page 3-37, the following text was revised:

Average annual precipitation is approximately ~~19~~ 20-25 inches, with the majority of precipitation occurring from November through April.

On page 3-86, the following text was revised:

As a result, implementation of the park Project would result in no changes to drainage that would result in flooding on or off site.

On page 3-86, the following text was revised:

During operation, the Project design includes fencing that would prevent visitors from accessing the drainage changes.

On page 3-86, the following significance conclusion was bolded to be consistent with the rest of the document.

The Project site is located in Federal Emergency Management Agency Flood Insurance Rate Maps (Nos. 06081C0138F) and is not located within a 100-year or 500-year flood

hazard zone (FEMA, 2024). The Project would have **no impact** on flood flows as the Project is not within a flood zone.

Section 3.13, Noise

On page 3-97, the footnote for Table 3.13-2 was corrected to line up the correct icon for “Clearly unacceptable” with the text.

On page 3-98, the following relevant policy from the San Mateo County General Plan were added:

Policy 16.12 Regulate Noise Levels. Regulate noise levels emanating from noise generating land uses through measures which establish maximum land use compatibility and nuisance thresholds.

Section 3.17, Transportation

On page 3-114, the following text was revised:

Construction vehicles entering and ~~existing~~ exiting public roadway can present an impact to the existing congestion management program; implementation of Mitigation Measure TR-1, which would require a Construction Traffic Management Plan, would ensure that the potential for inference would be reduced.

Section 3.20, Wildfire

On page 3-129, the following significance conclusion was bolded to be consistent with the rest of the document.

Project construction would not generate any substantial impacts on local roads and with implementation of Mitigation Measure TR-1, the Project would not cause substantial delays for emergency vehicles. Therefore, the Project would have a **less than significant impact with mitigation**.

Section 3.20, Wildfire

On page 3-138, the following text was revised:

There is potential that two special-status bats, pallid bat (~~*Aquila chrysaetos*~~ *Antrozous pallidus*) and Townsend's big-eared bat (*Corynorhinus townsendii*), could roost in trees in the riparian area.

CONCLUSIONS

The comments received do not affect the IS/MND’s conclusions that the Proposed Project would not have any significant effects on the environment. With the clarifications and Errata provided above, no additional changes to the IS/MND are necessary, and no recirculation of the IS/MND is required.

Granada Community Park and Recreation Center IS/MND
Consideration of Comments Received during the Public Review Period

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Attachment A
Comments Received on the IS/MND

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