

DEPARTMENT OF TRANSPORTATION

DIVISION OF AERONAUTICS – M.S.#40

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October 25, 2010

Ms. Camille Leung
San Mateo County
455 County Center, 2nd Floor
Redwood City, CA 94063

Dear Ms. Leung:

Re: San Mateo County's Final Environmental Impact Report (EIR) for the Big Wave Wellness Center and Office Park; SCH# 2008102109

The California Department of Transportation (Caltrans), Division of Aeronautics (Division), reviewed the Final EIR with respect to airport-related noise and safety impacts and regional aviation land use planning issues pursuant to the California Environmental Quality Act (CEQA). The Division previously commented on the Notice of Preparation on November 17, 2008, and the Draft EIR on December 21, 2009. The following comments are offered in response to San Mateo County's (County) Final EIR.

The proposal includes "housing and employment opportunities for low-income developmentally disabled" individuals. The project site is located immediately adjacent to Half Moon Bay Airport, approximately 300 feet from the runway. The Final EIR states that the residential portion has been reduced from 70 residential units to 57 units. Even at a reduced number, however, we consider placing residential units for the developmentally disabled in such close proximity to an airport runway as an unnecessary risk.

The Final EIR's Topical Response 14 (TP-14), *Location of Project near the Half Moon Bay Airport*, referenced a letter from the Federal Aviation Administration (FAA) that raised concerns about the project with respect to Assurance 21, *Compatible Land Use*, and objected to the project. In response to the FAA, TP-14 states that Mitigation Measure HAZ-3 has been revised to "further clarify and disclose the potential airport noise to the Wellness Center owner(s), staff, and residents." The County does not appear to acknowledge the very serious matter of noncompliance with FAA grant assurances. The proposal, even after revising HAZ-3, could jeopardize future FAA funding for airport safety and improvement projects if the County fails to comply with the assurances.

The Final EIR recognizes that a portion of the project site is within the Approach Protection Zone for Runway 30 as designated in the San Mateo County Comprehensive Airport Land Use Plan (CALUP). We recommend that the proposal should, therefore, be submitted to San Mateo County Airport Land Use Commission (ALUC) to ensure the proposal is consistent with the CALUP.

We previously said that the project site appeared to be within the Inner Approach and Departure Zone 2 as designated in the California Airport Land Use Planning Handbook (Handbook), available on-line at <http://www.dot.ca.gov/hq/planning/aeronaut/documents/ALUPHComplete-7-02rev.pdf>.

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The Response to Comments 169-3 (and TP-14) states that neither the ALUC nor the County had mapped Zone 2 for Half Moon Bay Airport. It then incorrectly links the size of Zone 2 with the dimensions of Zone 1, which is the Runway Protection Zone or RPZ. The RPZ is based on FAA approach visibility criteria and varies depending on the use of the runway. Like Example 4 in Figure 9K of the Handbook, Zone 2 is based on the length of the runway. In the case of Half Moon Bay Airport, the width of Zone 2 is 1,500 feet, not 450 feet as stated in Response 196-3. The Handbook generally recommends against residential uses except on large agricultural parcels within Zone 2.

As we stated in our previous comment letters, “Protecting people and property on the ground from the potential consequences of near-airport aircraft accidents is a fundamental land use compatibility-planning objective. While the chance of an aircraft injuring someone on the ground is historically quite low, an aircraft accident is a high consequence event. To protect people and property on the ground from the risks of near-airport aircraft accidents, some form of restrictions on land use is essential.”

Of particular concern is the safety of the developmentally disabled individuals who will reside in the units. They are considered a “sensitive use” according to the Handbook, which states, “certain types of land uses are also regarded as requiring special protection from hazards such as potential aircraft accidents.” They fall into two categories: *Hazardous Materials* and *Low Effective Mobility Occupancies*. As discussed on page 9-3, with respect to *Low Effective Mobility Occupancies*, the Handbook recognizes that “society normally seeks a high degree of protection for certain groups of people, especially children and the infirm.” As discussed, a common characteristic among these groups is the inability to move out of harm’s way, either due to inexperience or physical limitations.

Additionally, the Final EIR addresses emergency evacuation for fires and tsunamis but not in the event of an aircraft accident.

These comments reflect the areas of concern to the Division with respect to airport-related noise and safety impacts and regional airport land use planning issues. We advise you to contact our Caltrans District 4 office concerning surface transportation issues.

Thank you for the opportunity to review and comment on this proposal. If you have any questions, please call me at (916) 654-5314 or by email at sandy.hesnard@dot.ca.gov.

Sincerely,

Original Signed by

SANDY HESNARD
Aviation Environmental Specialist

c: State Clearinghouse, Half Moon Bay Airport, San Mateo County ALUC, FAA