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California Coastal Program
Mark Massara, Director

Susan Craig
California Coastal Commission
725 Front Street, Ste. 300
Santa Cruz, Cal. 95060

March 10, 2004

Re: Wavecrest, Half Moon Bay

Dear Susan:

It has come to the attention of Sierra Club that the on again - off again Wavecrest development project in the City of Half Moon Bay is on again. And while the current project lacks a project description or any specific maps or proposals, we were recently able to obtain a "illustrative plan" drawing dated June 26, 2003 that apparently was just made public by the Wavecrest developers.

This map raises at least two important threshold questions that Sierra Club would appreciate you address in your analysis.

First, the "illustrative map" includes two general areas of housing associated with the project, one located west of the proposed school site along Highway 1, and another located on top of the existing baseball fields. While the map is vague as to the number or type of houses proposed, it looks substantial. Sierra Club wants to know the basis of the housing subdivision request. It appears that the proposal will eventually be in the form of a Specific Map, based upon ancient lots located in another area of the property known for extensive wetlands. In the past the developer has claimed over 200 lots on the property.

It is also clear that the entirety of the area now proposed for development consists of only three separate lots. If the 200 orphan lots do not have certificates of compliance or some other legal standing or entitlement, we question the need to allow for their redistribution or acknowledgement, or if they can be the basis of a large scale housing proposal on other parts of the property.

This is especially true given our second concern regarding the property, that being the extensive nature of the undelineated wetlands. I can testify as to having spent at least four hours on the property last Saturday, March 6, 2004 and to having personally

witnessed standing water and wetlands vegetation across most of the property now proposed for development.

In order to make the record abundantly clear, I took over 150 pictures which I am providing to you via CD as "Attachment A" to this letter. In nearly every photo, I have tried to capture the wetlands and plants in a way that allows you to see the horizon in order to determine exactly where the wetlands are located. In those photos where it was necessary to point the camera directly toward the standing water, plants or soils, the pictures before and after should help orient you. If not, I am prepared and ready to assist you in ascertaining the exact location of the photo.

In general, I examined and photographed the four areas now proposed for development. In Area One, which is currently ball fields but proposed for housing, the area surrounding the ball fields can adequately be described as saturated. If the ball fields were not built on fill, it is my opinion that they too would be underwater. Ponds and standing water exist at this moment within twenty feet of the outside of the ball fields and can be found throughout the wetland complex area proposed for residential development. A water-filled ditch runs alongside the "dog run" play field. Take particular note of the mud and ponds at the current ball fields parking area, of the stands of Cypress trees nearby and the old camper shell. Each of those areas is ponded and each contains wetland vegetation. The camper shell itself sits in a big puddle. When adequately mapped, it is my impression that in Area One no development envelope will exist outside either wetlands or a wetlands buffer area.

Area Two is the other housing area proposed, and is to be placed in the northwest portion of the property adjacent to the school site. Here too standing water and ponding was found throughout. Notably the "agricultural reservoir" area is surrounded by ponds lying outside of its berms (not to mention that the reservoir itself is significantly larger than depicted in the "illustrative plan").

Also of note is that much of Area Two was apparently badly disked and seeded a few years back, and the distinct lack of wetlands vegetation is suspect. The land is chopped up, with water ponding and wet soils in the ruts and green grass on top clumps. While I suspect that if left alone over time the property would settle and revert to a vernal pool complex, Sierra Club would like assurances that if and when these wetlands are finally delineated that the mapping measures the ruts and not just the highest rising topsoils. In the Area Two photos please note the new homes in the background, along the new street that is the northern boundary of the Wavecrest project area.

Area Three is adjacent to Highway 1 and is the proposed school site. With little effort I was able to find standing water and wetlands plants in this area as well. Note Highway 1 and the Half Moon Bay Fire Station in the background of these photos.

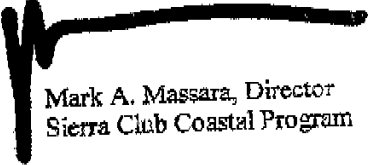
Area Four is adjacent to Highway 1 and is proposed for development of baseball fields and a Boys and Girls Club. This is the only area, as far as I know, that has been previously delineated for wetlands. I found significant amounts of standing water and

wetlands vegetation at this site. Please note Highway 1 signs in the pictures. It also appears that the Boys Club building on the "illustrative plan" is proposed for directly on top of a significantly sized pond. In addition, it does not appear that the two ball fields proposed for the area between Wavescrest Road and the existing farmhouse (not a part of the project) can actually fit in that amount of space (even if it were not wetlands).

Based upon the foregoing and the photographs, we would urge that you visit the property and confirm the existence of the extensive wetlands onsite as soon as possible as the current record setting heat wave and onset of spring is likely to create the appearance of dry soils within a matter of weeks.

Thank you for this opportunity to comment on this project. We look forward to hearing more details and receiving your analysis as it becomes available. Please do not hesitate to contact us if we can provide you with any further information.

Sincerely,



Mark A. Massara, Director
Sierra Club Coastal Program