

From: [JO Oeswein](#)
To: [Planning Commission](#)
Cc: [Karen DeMoor](#); [Dolores Silva](#)
Subject: Planning Commission Meeting, Sep 13, 2023, Agenda Item 2: Cypress Point DEIR
Date: Tuesday, September 12, 2023 5:38:45 PM
Attachments: [Midcoast ECO PC letter-9-13-23.pdf](#)

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Dear Honorable Commissioners:

I write on behalf of Midcoast ECO, a community-focused, educational and advocacy non-profit organization promoting sensible planning and protection of the San Mateo County Midcoast.

As you may recall, **the Cypress Point project site was a former WWII military training facility, with no history of appropriate environmental assessment or cleanup.** In addition, it has been essentially abandoned for the last 60 years and has been subjected to decades of illegal dumping of appliances, furniture, motor oil, diesel fuel and trash. The site also lies directly above Montara Creek, which drains into the federally protected Fitzgerald Marine Reserve.

In last December's PC meeting on this projects EIR scope, we pointed out the inadequacy of the previous limited studies that assessed hazardous materials at this site that were used to justify the zoning change. **At that time, we also recommended a more robust study for the EIR** that would better evaluate toxic contaminants exposure and risk to current and future residents. We were led to believe and had assumed that such a study would be undertaken as part of the EIR. **Unfortunately, no such study was done.** Instead, the DEIR proposes that a construction contractor will somehow take care of any hazardous materials, with no protocol or plan provided. **This does not give the community confidence that the site will be appropriately cleaned up or that hazardous materials can be removed safely.**

In addition, the EIR's proposed storm drainage system design is undersized for today's climate and risks additional soil erosion and site runoff of any hazardous materials into Montara Creek and the Fitzgerald Marine Reserve.

We therefore request that the PC require additional studies before accepting this EIR.

Specifically:

1. We request **development of a more robust hazardous material testing plan** for the entire project site based on a DTSC or SFRWQCB protocol, preferably with oversight by one of those agencies. The plan must consider sampling locations and bore depths based on site history and possible migration of contaminants, taking into account potential migration pathways including leaching through the soil column, transport by air, and groundwater flow. This plan must require broader testing for likely contaminants throughout the site, including asbestos (from floor/ceiling tiles, electrical conduit, coatings, concrete), lead (from paint, leaded gasoline, pipes, ammunition), VOCs (volatile organic compounds from cleaning solvents), TPH (total petroleum hydrocarbons from fuels), PCBs (polychlorinated biphenyls)

from electrical equipment, motor oil, insulation, paint, floor finish), dioxins/furans (from waste incineration, burning fuels) and CAM17 metals.

2. We also request that PC require **development of a new mitigation plan** that will give the public confidence that all hazardous materials will be removed safely without risk to current local residents and that the site will be safe for housing development. This should **include a detailed plan for how construction contractors will assess and remove hazardous materials**, including how they will utilize local streets for safe transport.

3. Finally, we request that PC require **development of a more robust site drainage system** that can handle more significant and expected storm events, in order to reduce soil erosion and contamination risk to local waters.

Your attention to these critical issues is vital to help ensure that the conclusions presented in the final EIR will be based on strong evidence.

Sincerely,

JQ Oeswein, Ph.D.
Midcoast ECO Board of Directors

JQ Oeswein
Board Member I **Midcoast ECO** I www.MidcoastECO.org
Sensible planning and protection for the SM County Midcoast!

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