

**COUNTY OF SAN MATEO
PLANNING AND BUILDING**

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September 20, 2018

Andrew Bielak
MidPen Housing Corporation
303 Vintage Park Drive, Suite 250
Foster City, CA 94404

Dear Mr. Bielak:

SUBJECT: Cypress Point PUD rezoning
Carlos Street, Moss Beach
PLN 2018-00264; APN: 037-022-070

Your application has received a preliminary review by the Planning Department and other associated State and local agencies. The comments provided by these other agencies are included as attachments to this cover letter.

The County recognizes that there are significant issues pertaining to transportation impacts as highlighted in both the CalTrans letter and the comments from the Mid-Coast Community Council. As we have discussed previously and as seen in the attached comments, understanding the potential impacts of your project upon the existing transportation infrastructure and how to mitigate those impacts is a critical issue to be resolved. Integration of potential mitigation measures into the larger County efforts to address traffic issues in the Mid-Coast community must be addressed in cooperation with County staff. In the coming weeks, the County looks forward to working with you on this integration/planning process.

Sincerely,



Michael Schaller
Senior Planner



Midcoast Community Council

representing Montara, Moss Beach, El Granada, Princeton, and Miramar
P.O. Box 248, Moss Beach, CA 94038-0248 - www.MidcoastCommunityCouncil.org

Dave Olson . Claire Toutant . Lisa Ketcham . Dan Haggerty . Chris Johnson . Brandon Kwan . Barbra Mathewson
Chair Vice-Chair Secretary Treasurer

Date: September 26, 2018

To: Michael Schaller, Project Planner

cc: Supervisor Don Horsley

Steve Monowitz, Community Development Director

Renée Ananda, CCC Coastal Program Analyst

From: Midcoast Community Council/ Dave Olson, Chair

Subject: **Proposed 71-Unit Cypress Point Affordable Housing Community
on Carlos St, Moss Beach** – PLN2018-00264, APN 037-022-070

Thank you for the additional time to comment on this project referral. The following comments are in addition to those MCC submitted on August 22, 2018 (attached).

Hazardous Materials

- Additional soil sampling should be performed, as recommended in the Phase 2 report, to assess the horizontal extent of lead-impacted surface soils.
- Remnants of 1940's-era buildings should be assessed for asbestos-containing materials, and surface soils should be analyzed for elevated levels of asbestos fibers.

Traffic Impacts and the Comprehensive Transportation Management Plan (CTMP)

It does not serve the community or the project, to attempt to determine key circulation elements for Moss Beach absent an approved long-range Comprehensive Transportation Management Plan (CTMP), aka Connect the Coastside.

- Project traffic impacts and proposed mitigations are analyzed based on existing LOS standards, whereas the March 2016 draft of the long-delayed CTMP proposes a significant revision of LOS standards.
- Project traffic mitigations propose re-routing peak-hour Vallemar highway access to Wienke, whereas the 2016 draft CTMP clearly states Wienke highway access would have to be restricted and an alternate route identified. Vallemar or Wienke are the only access points for a neighborhood of about 75 homes.
- The 2016 CTMP draft proposal of two Hwy 1 traffic signals at California and Cypress galvanized a strong Midcoast preference for roundabouts, which has since been partially addressed with a feasibility study for Cypress. At California/Wienke the 2016 draft CTMP (p. 25) balks at doing any significant study for a roundabout due to the complication of the 5-way intersection, but then acknowledges that a signalized intersection would require re-routing Wienke Way! The community has heard no more on the matter until the Community Development Director's 8/16/18 email which does not bode well: "From our analysis to date, the project will necessitate the installation of a signal and improved crossing at California Ave."

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Date: August 22, 2018

To: Michael Schaller, Project Planner

cc: Supervisor Don Horsley

Steve Monowitz, Community Development Director

Renée Ananda, CCC Coastal Program Analyst

From: Midcoast Community Council/ Dave Olson, Chair

Subject: **Proposed 71-Unit Cypress Point Affordable Housing Community
on Carlos St, Moss Beach – PLN2018-00264, APN 037-022-070**

Wide public opposition to this project continues unabated, as demonstrated at MCC standing-room-only meeting 8/22/18 to consider this referral.

MCC 9/27/17 comments¹ on the pre-application for this project focused on the many long-standing community concerns regarding traffic, transit, and bike/pedestrian safety & mobility that are the subject of the Highway 1 Safety & Mobility Improvement Studies (Mobility Study), the Midcoast Highway 1 Crossings Project and the soon-to-be-released final draft of Connect the Coastside's Comprehensive Transportation Management Plan. Many years of Midcoast growth without much-needed and long-identified bike/ped safety and mobility improvements have caught up with us now with too many people dependent on their cars and stuck in traffic without safe and convenient alternative transportation. The key challenge to this project is the isolated rural site without adequate transit or bike/ped facilities, leaving residents dependent on their automobiles to reach jobs and services on already congested roads.

Midcoast Residential Build-out

MCC has consistently advocated for the need to significantly reduce Midcoast residential build-out. The proposed LCP amendment would reduce land use density for this 11-acre parcel from medium-high to medium. Residential build-out numbers currently allocated to the parcel would be reduced by more than half, from 148 to 71 units.

Affordability and Residency Preference for Local Workers

A stated project objective is to improve the jobs-housing balance in the Midcoast region; however, Midcoast housing far exceeds local jobs. The applicant has stated they would not be legally allowed to restrict housing to those with local jobs, but that a portion of the units will include a preference for households who already live or work in the region. MCC would prefer that the preference apply to all units. Every new residential unit that does not provide affordable housing for our local workforce, adds to our coastal jobs-housing imbalance and traffic congestion.

¹ <http://www.midcoastcommunitycouncil.org/storage/mtgs-com2017/2017-09-27-MidPen-pre-app-MCC-com.pdf>

The requested amendment to LCP Policy 3.15(d) calls for all units, apart from resident manager's, to serve low- or moderate-income households. Elsewhere in the submittal the project consistently proposes all units restricted to low income (less than 80% AMI). MCC requests that the proposed LCP amendment match the rest of the submittal regarding low income affordability.

San Mateo County AMI is significantly higher than what local Coastside jobs provide. In Half Moon Bay one quarter of households earns less than \$50,000 per year. Please clarify how the proposed income restrictions would provide a Coastside jobs-housing fit.

Construction Phasing

Construction is proposed in one phase, over approximately 18 months. If built in two phases, would there be more opportunity for residents with Coastside jobs to receive preference? Approving more than the annual limit of 40 residential units/year cannot be justified if many of those units will go to residents commuting to jobs out of the area.

Public Transit

The project site is located on the Hwy 1 corridor adjacent to SamTrans Route 17 bus stops at 14th & 16th. Route 17 directly reaches Coastside job hubs in Half Moon Bay, Princeton, and Pacifica (10 minutes to Linda Mar and 25 minutes to downtown HMB). Current #17 service is hourly on weekdays, and every two hours on weekends. However, on weekdays at this location there is no southbound AM or northbound PM service when #17 is routed via Sunshine Valley Road (SVR). Route #18 has limited weekday service to Middle and High School in HMB but is also routed via SVR. Outside those hours, ridership utilizing SVR bus stops is very low and the more direct route on Etheldore and Highway 1 better serves other riders.

Mitigation TRAF-5B: The applicant proposes to address the safety of pedestrians crossing to the adjacent southbound bus stop at the lighthouse hostel by eliminating it and re-routing all buses via SVR. That would also eliminate the Hwy 1 bus stop at 14th, and Etheldore stops at California and Vermont. The closest bus stops to the project would then be 1/2 mile to 7th/Main or 3/4 mile to Etheldore/SVR, well outside the 1/4 mile range of convenience.

This proposal ignores the need for safe crossing at lighthouse/16th for the Coastal Trail, and inefficiency of SVR during non-school hours and travel direction. In order to serve the project, it would be better to keep the adjacent bus stop at the lighthouse hostel and explore re-routing all Route 17 trips to Hwy 1 and Etheldore, and leaving Route 18 to serve school riders on SVR.

This project highlights the urgent need for expanded Coastside public transit. Without convenient school and commuter bus service at this location on the highway corridor, or a project-sponsored shuttle to and from local jobs, this project cannot be justified.

Bike/Pedestrian Safety & Mobility

For pedestrian safety, Mitigation TRAF-5A proposes a sidewalk connection between the project entrance on Carlos to the north side of Sierra Street.

The need for safe highway crossing at the lighthouse/16th cannot be brushed aside by saying there is no need for residents to cross the highway because the bus stop has

been removed. East side residents, workers and visitors all need to be able to conveniently walk or bike to the west side for recreation. Two crossing concepts for the lighthouse/16th were included in the 2012 Mobility Study – a raised median refuge island for 2-stage crossing and an overcrossing to the south where the road cut makes that feasible. The proposed project, with a significant number of new bike/ped/transit users, makes a safe crossing urgent.

If this housing project is to proceed, the Parallel Trail segment in this area must be prioritized and implemented, at a minimum between downtown Moss Beach and 14th St. Creating a bike/pedestrian-friendly community and calming highway traffic will help draw the kind of neighborhood commercial businesses needed to serve existing and future residents.

Vehicle Highway Access & Safety

Carlos: Mitigation TRAF-2B proposes to decrease hazards by closing Carlos St north of the project entrance to all vehicles except emergency services. The Mobility Study and Connect the Coastside show this intersection as right turn only entering the highway and continued use of the center left turn lane eastbound into Carlos. Traffic counts show significant existing peak hour traffic from Sierra and Stetson using this route, which should remain available. Feasibility of re-routing Carlos to 16th for safer vehicle highway access needs further analysis. It is insufficient to say it is not feasible due to grading requirements and Level of Service (LOS) impact on 16th St, which has only three residences.

Vallemar/Etheldore and lighthouse/16th: Mitigation TRAF-3B proposes to address LOS by restricting peak hour left turns entering the highway at Etheldore/Vallemar. Left turns would be reassigned to Calif/Wienke. This would be a significant re-route for Vallemar which does not connect directly to Wienke and would add trips to that complicated 5-way intersection. As long as there is lane space on Vallemar so that left-turning vehicles do not block those turning right, turning movements should not be restricted simply to achieve a better LOS rating. A similar right-turn-only restriction proposed for lighthouse/16th during PM peak period seems unnecessary to address LOS at that very lightly used intersection.

California/Wienke: Mitigation TRAF-1A proposes to address LOS by converting intersection control at California/Wienke to roundabout or signal, to be determined by ICE study required by Caltrans. California meets the signal warrant under existing conditions. Additional project trips at this intersection should be re-calculated for keeping Carlos open and should also consider that all new and re-assigned traffic will not necessarily use California for highway access. When a queue builds, motorists often choose among the three other adjacent intersections to spread out the wait time to enter the highway.

MCC and the community are adamantly opposed to any more traffic signals in the Midcoast. A signal at California, stopping highway traffic, and added pollution-spewing stacking lanes further splitting our town, would destroy the community vision for a context appropriate village circulation plan as was outlined in the Safety & Mobility Study. A roundabout at each end of Moss Beach would calm traffic without stopping it, provide safe pedestrian crossings, and convenient U-turns to avoid making left turns onto the highway, improving LOS at all intersections.

Discrepancies in submittal documents

Consistency Evaluation

Table 1, LCP Policies:

Policy 3.16(a)

- *"limits the number of building permits in any 12-month period to 60".*
Correction: not building permits, but affordable housing units.

Policy 3.3:

- *"A portion of units in the project will include a preference for households who already live or work in the region."*
Other references in the application make no mention of limiting this preference to a portion of the units. Please clarify.
- *"According to census data compiled in 2016, the three adjacent communities of Montara, Moss Beach, and El Granada – all of which are within 6 miles of the project site – contain 1,364 jobs."*
Does this include jobs in Princeton and unincorporated Miramar?
- *"The project is within 1/4 mile walking distance of the Coastside Market grocery, Moss Beach Park, Farallone View Elementary School, and the Seton Coastside Medical Center."*
Correction: Coastside Market (a liquor/convenience store) and Moss Beach Park 1/2 mile, Farallone View School 1 mile, Seton Medical Center 1.2 miles.

Table 4 Community Plan 7.2(b):

- *"The project would consist of two-story buildings with roof heights varying between 32 and 36 ft."*
This conflicts with PUD-124, #5: *"No structure shall exceed two stories or an average height of 25 ft."*
Adherence to the lower height limit will help with neighborhood visual compatibility.

Cumulative Impacts Analysis

Table 3 – List of Reasonably Foreseeable Projects

- HMB and Pacifica included comprehensive list with single-family dwellings. SMC unincorporated Midcoast includes only Big Wave, Harbor Village RV, 7th St Hotel, Main St Hotel. The mixed-use building at Hwy 1/Virginia and the many Midcoast single-family dwellings in the permitting process should be included.

Table 4&5 -- Population & Housing Units

- Pacifica and HMB are included, but the Midcoast is represented by only Montara and Moss Beach. El Granada, Princeton, and Miramar should be included.

Hwy 1 Moss Beach 50 mph speed limit is consistently misreported:

Responses to Workshop Comments

#3 Traffic: *"combination of conditions that include 55 mph speed limits..."*

#8 Pedestrian Traffic: *"operational challenges due to the 55 mph speed limit..."*

Traffic Impact Analysis, p.33: *"a 55-mph facility such as Highway 1"*

Thank you for the opportunity to comment.

DEPARTMENT OF TRANSPORTATION

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*Making Conservation
a California Way of Life.*

August 29, 2018

GTS # 04-SM-2017-00196

GTS ID: 7281

PM: SM – 1 – 85.833

Mike Schaller, Senior Planner
County of San Mateo
455 County Center, 2nd Floor
Redwood City, CA 94063

Cypress Point Project– Application Referral

Dear Mr. Schaller:

Thank you continuing to include the California Department of Transportation (Caltrans) in the environmental review process for the Cypress Point Project. The comments in this review reflect Caltrans' modernized approach to evaluating and mitigating impacts to the State Transportation Network (STN). Our Strategic Management Plan 2015-2020 aims to reduce Vehicle Miles Traveled (VMT), in part by tripling bicycle and doubling both pedestrian and transit travel by 2020. Our comments are based on the July 31, 2018 *Planning Permit Application Referral*, including the *July 2018 Cypress Point Traffic Impact Analysis, County Review Draft (July 2018 TIA)*. Our previous comment letters regarding this project, including our September 25, 2017 letter on the *July 2017 Planning Permit Application Referral*, and our April 9, 2018 letter on the *January 2018 Draft Cypress Point Traffic Analysis (January 2018 Draft Traffic Analysis)* are incorporated by reference.

Project Understanding

Local Coastal Plan (LCP) and General Plan Land Use Map amendments, Zoning Amendment, and Coastal Development Permit (CDP) to rezone the subject parcel from its existing planned unit development (PUD) designation. The proposal would reduce the number of dwelling units on the site from 148 (mix of market rate and affordable) to 71 units (all affordable). Access to the site is to be located on Carlos Street, approximately 600 feet south of its intersection with State Route (SR) 1.

Multimodal Planning

Improvements to, and reconfiguration of SR 1 and local streets may be necessary to accommodate increased vehicle, transit, pedestrian, and bicycle trips associated with the project. The geometry, topography, and coastal proximity of the site present challenges. The applicant should further analyze alternatives for improving pedestrian and bicycle access in the area, specifically, opportunities for improving pedestrian and bicycle crossings of SR 1. This

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development is likely to increase demand for pedestrian and bicycle access to nearby beaches and other destinations on the west side of the highway, and any roadway changes should reflect this.

Please revise the Transit Service part the Existing Conditions section of the *July 2018 TIA*, which appears to omit or incorrectly locate various SamTrans bus stops near the project site, including the northbound route 17 bus stop at SR 1 and 14th Street, and stops on Main Street in Montara. One of the recommended improvements stated in the *July 2018 TIA* is to work with SamTrans to remove the existing southbound route 17 bus stop located on SR 1 between 16th Street and Carlos Street. By removing this stop, the nearest southbound stop for the route 17 bus would be at California Avenue and Etheldore Street, just over 0.5 miles from the project site, twice as far from the project site as the existing northbound stop. Rather than removing this transit stop and reducing access for residents, consider relocating it to a location across from the existing northbound stop at SR 1 and 14th Street and providing a Pedestrian Hybrid Beacon at this location, as well as facilities to provide adequate pedestrian and bicycle access to and from the project site.

The project's primary and secondary effects on pedestrians, bicyclists, travelers with disabilities, and transit users should be evaluated, including countermeasures and trade-offs resulting from mitigating VMT increases. Access for pedestrians and bicyclists to transit facilities must be maintained.

Hydraulics

There appears to be a discrepancy between the plans shown and the written text in the Stevens Consulting *Cypress Point Project Introduction and Project Description*, Section 2.2.5, page 13, Grading and Drainage. The plans show two detention ponds with 4,600 sf capacity, while the text in Section 2.2.5 describes four detention ponds to be utilized with a capacity of 20,000 sf. This discrepancy needs to be addressed.

Travel Demand Analysis and Mitigation

The *July 2018 TIA* has not been updated to reflect Caltrans' comments on the *January 2018 Draft Traffic Analysis*, which were sent on April 9, 2018. Please address these comments (attached), including the Travel Demand Analysis section.

The project's impact on state facilities are significant; as acknowledged in the study. The project should either provide mitigation or pay its fair share fee for its impact. We encourage a sufficient allocation of fair share contributions toward multi-modal and regional transit improvements to fully mitigate cumulative impacts to regional transportation. We also strongly support measures to increase sustainable mode shares, thereby reducing VMT.

Vehicle Trip Reduction

From Caltrans' *Smart Mobility 2010: A Call to Action for the New Decade*, the project site is identified as **Place Type 5a: Rural Towns**, where location efficiency factors, such as community design, are moderate to high and regional accessibility varies. Given the place type

and size of the project, it should include a robust Transportation Demand Management (TDM) Program to reduce VMT and greenhouse gas emissions. The measures listed below will promote smart mobility and reduce regional VMT.

- Project design to encourage walking, bicycling and transit access;
- Transit and trip planning resources such as a commute information kiosk;
- Real-time transit information system;
- Transit subsidies on an ongoing basis;
- Ten percent vehicle parking reduction;
- Charging stations and designated parking spaces for electric vehicles;
- Carpool and clean-fuel parking spaces;
- Designated parking spaces for a car share program;
- Unbundled parking;
- Secured bicycle storage facilities;
- Fix-it bicycle repair station(s);
- Bicycle route mapping resources;
- Participation/Formation in/of a Transportation Management Association (TMA) in partnership with other developments in the area; and
- Aggressive trip reduction targets with Lead Agency monitoring and enforcement.

Transportation Demand Management programs should be documented with annual monitoring reports by an onsite TDM coordinator to demonstrate effectiveness. If the project does not achieve the VMT reduction goals, the reports should also include next steps to take in order to achieve those targets. Also, reducing parking supply can encourage active forms of transportation, reduce regional VMT, and lessen future transportation impacts on State facilities. These smart growth approaches are consistent with the MTC's Regional Transportation Plan/SCS goals and would meet Caltrans Strategic Management Plan sustainability goals.

For additional TDM options, please refer to the Federal Highway Administration's *Integrating Demand Management into the Transportation Planning Process: A Desk Reference* (Chapter 8). The reference is available online at:
<http://www.ops.fhwa.dot.gov/publications/fhwahop12035/fhwahop12035.pdf>.

Cultural Resource

The project area is extremely sensitive for archaeological deposits as archaeology sites have been recorded within and adjacent to the project area. As part of the environmental review in support of the LCP amendment, we recommend that San Mateo County conduct a cultural resource technical study that at a minimum includes a records search at the Northwest Information Center of the California Historical Resources Information System (CHRIS), a field survey of the project area by a qualified archaeologist, and Native American consultation.

If an encroachment permit is needed for work within Caltrans right-of-way (ROW), we may require that cultural resource technical studies be prepared in compliance with CEQA, Public

Mr. Schaller, San Mateo County
August 29, 2018
Page 4

Resources Code (PRC) 5024, and the Caltrans Standard Environmental Reference (SER) Chapter 2 (<http://www.dot.ca.gov/ser/vol2/vol2.htm>). Should ground-disturbing activities take place within Caltrans ROW and there is an inadvertent archaeological or burial discovery, in compliance with CEQA, PRC 5024.5, and the SER, all construction within 60 feet of the find shall cease and the Caltrans District 4 Office of Cultural Resource Studies (OCRS) shall be immediately contacted at (510) 622-1673.

Lead Agency

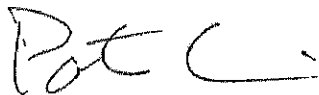
As the Lead Agency, the County of San Mateo is responsible for all project mitigation, including any needed improvements to the STN. The project's fair share contribution, financing, scheduling, implementation responsibilities and lead agency monitoring should be fully discussed for all proposed mitigation measures.

Encroachment Permit

Please be advised that any work or traffic control that encroaches onto the state ROW requires an encroachment permit that is issued by Caltrans. To apply, a completed encroachment permit application, environmental documentation, and six (6) sets of plans clearly indicating state ROW must be submitted to: Office of Permits, California DOT, District 4, P.O. Box 23660, Oakland, CA 94623-0660. Traffic-related mitigation measures should be incorporated into the construction plans during the encroachment permit process. See the website link below for more information: <http://www.dot.ca.gov/hq/traffops/developserv/permits/>.

Thank you again for including Caltrans in the environmental review process. Should you have any questions regarding this letter, please contact Jake Freedman at 510-286-5518 or jake.freedman@dot.ca.gov.

Sincerely,



PATRICIA MAURICE
District Branch Chief
Local Development - Intergovernmental Review

c: State Clearinghouse
Attachments: Caltrans Cypress Point Comment Letter of April 9, 2018

DEPARTMENT OF TRANSPORTATION

DISTRICT 4

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April 9, 2018

GTS # 04-SM-2017-00164

GTS ID: 7281

PM: SM – 1 – 85.833

Mr. Rob Bartoli
County of San Mateo
455 County Center, 2nd Floor
Redwood City, CA 94063

Cypress Point – January 2018 Cypress Point Traffic Analysis Draft

Dear Mr. Rob Bartoli:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Cypress Point project. In tandem with the Metropolitan Transportation Commission's (MTC) Sustainable Communities Strategy (SCS), Caltrans' mission signals a modernization of our approach to evaluate and mitigate impacts to the State Transportation Network (STN). Caltrans' *Strategic Management Plan 2015-2020* aims to reduce Vehicle Miles Traveled (VMT) by tripling bicycle and doubling both pedestrian and transit travel by 2020. Our comments are based on the January 2018 Draft Traffic Analysis.

Project Understanding

Currently in the pre-application process, the Cypress Point project proposes the construction of a 71-unit affordable housing community consisting of 16 one-bedroom, 38 two-bedroom, and 18 three-bedroom units contained in two-story structures with dedicated open space and walking trails on a 10,875-acre site (currently zoned PUD-124). The project would minimally require a rezoning and Coastal Development Permit (CDP). All except the manager's unit will be rented to individuals earning less than 80% area median income (AMI).

Access to the project site would be provided by a driveway on Carlos Street, near the intersection with Sierra Street. The project site is close to the intersection of State Route (SR) 1 and Carlos Street. Improvements to SR 1 intersections may be necessary to accommodate increased vehicle, transit, pedestrian, and bicycle trips associated with the project. The geometry, topography, and coastal proximity of the site present challenges.

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State Route 1 Challenges

This project is located on Carlos Street approximately 500 feet from the Carlos Street/SR 1 intersection. There are multiple constraints affecting SR 1 in this area that must be addressed to accommodate project traffic. These include:

- SR 1 functions both as a high-speed arterial and serves as de-facto main streets for multiple towns and settlements along the corridor.
- Right-of-way (ROW) constraints and topography limit options for the Carlos Street/SR 1 intersection.
- SR 1 has limited accommodations for transit users, cyclists, and pedestrians in this area.
- Sight distance and potential turning movement conflicts limit the options for intersection improvements.
- Accessing the coast or existing southbound SamTrans Route 17 bus stop, which runs on one-hour headways, requires crossing SR 1 at an unsignalized intersection.
- Accessing the northbound SamTrans route 17 bus or the community of Montara requires walking along the shoulder of SR 1 for approximately 0.15 miles.

Proposed Improvements

To address the issues described above, the Draft Traffic Analysis recommends restricting traffic at the following SR 1 intersections:

- Carlos Street; emergency vehicles only between project driveway and SR 1,
- 16th Street, eastbound and westbound approaches; right turns only,
- Vallemar Street/Etheldore Street, eastbound and westbound approaches; right turns only.

The project also proposes to convert the SR 1/California Avenue/Wienke Way intersection from two-way stop controlled into a roundabout or signalized intersection.

Travel Demand Analysis

As noted above, the Draft Traffic Analysis recommends restricting traffic at SR 1 intersections with Carlos Street, 16th Street, and Vallemar Street/Etheldore Street. Please clarify how the proposed traffic patterns will impact nearby intersections. The proposed movement restrictions require a traffic study that re-assigns the prohibited movements to alternate intersections using peak hour volumes in each scenario. Turning movements for all project scenarios should be evaluated, as well as storage capacity. Please also clarify if trucks can make a U-turn at these intersections and provide necessary analysis. The intersection analysis with the proposed project trip assignments to the SR 1 intersections listed below should be provided for all project scenarios for our review and comment.

- 14th Street (Referred to in Draft Traffic Analysis as intersection #1),
- Vallemar Street/Etheldore Street (#6),
- California Avenue/Wienke Way (#7).

Please provide traffic analysis using Synchro/Simtraffic models and include the level of service (LOS), delays, and 95th percentile queuing from the Simtraffic Model in addition to the travel time for the intersections listed below. As there is concern that queuing vehicles may lead to

turning movement conflicts, and these types of operational concerns are not exempt under the California Environmental Quality Act (CEQA), SR 1 intersections should be evaluated for adequate storage capacity for left-turn movements.

- SR 1 and 14th Street (#1),
- SR 1 and Vallemar Street / Etheldore Street (#6),
- SR 1 and California Avenue/Wienke Way (#7), which should be analyzed as a five-leg intersection. Please clarify the volume of traffic from Wienke Way and provide an Intersection Control Evaluation (ICE) that provides justification for the project-proposed signal-control-intersection as opposed to roundabout intersection control,
- Carlos Street and California Avenue (#8), and
- Carlos Street & Etheldore Street.

Multimodal Planning

The needs for bicycle, pedestrian, and transit infrastructure improvements in the area exceed the scope of this project, however, the Lead Agency should identify interventions and funding mechanisms to mitigate the cumulative need for these facilities in the area and adopt a plan for implementation. We encourage a sufficient allocation of fair share contributions toward multimodal and regional transit improvements to fully mitigate cumulative impacts to regional transportation.

The Lead Agency should evaluate alternatives including the construction of a class I multi-use path adjacent to SR 1 from Carlos Street to 14th Street, construction of a Pedestrian Hybrid Beacon and high-visibility crosswalk at the 14th Street intersection, and the relocation of the SamTrans Route 17 southbound bus stop to that location across from the existing northbound stop. Pedestrian access to existing sidewalks could be improved by connecting the project with the existing sidewalk on Sierra Street as noted in the Draft Traffic Analysis as Recommended Improvement TRAF-5A.

The project's primary and secondary effects on pedestrians, bicyclists, disabled travelers and transit users should be evaluated, including countermeasures and trade-offs resulting from mitigating VMT increases. Access for pedestrians and bicyclists to transit facilities must be maintained.

Vehicle Trip Reduction

From Caltrans' *Smart Mobility 2010: A Call to Action for the New Decade*, the project site is identified as **Place Type 5a: Rural Towns** where location efficiency factors, such as community design, are moderate to high and regional accessibility is low. The project site is in the unincorporated community of Moss Beach, adjacent to the border with Montara. The outlying location of the project site relative to local population centers, the natural barriers created by area topography, and the limited bicycle and pedestrian facilities in the area significantly limit car-free mobility. Given the place type and size of the project, it should consider a robust Transportation Demand Management (TDM) Program including the elements below to reduce VMT and greenhouse gas emissions.

- Project design to encourage walking, bicycling and transit access;
- Transit and trip planning resources such as a commute information kiosk;
- Real-time transit information system;
- Transit subsidies for residents on an ongoing basis;
- Ten percent vehicle parking reductions;
- Charging stations and designated parking spaces for electric vehicles;
- Designated parking spaces for a car share program;
- Unbundled parking;
- Emergency Ride Home program;
- Secured bicycle storage facilities;
- Fix-it bicycle repair station(s);
- Bicycle route mapping resources;
- Participation/Formation in/of a Transportation Management Association (TMA) in partnership with other developments in the area; and
- Aggressive trip reduction targets with Lead Agency monitoring and enforcement.

For additional TDM options, please refer to the Federal Highway Administration's *Integrating Demand Management into the Transportation Planning Process: A Desk Reference* (Chapter 8). The reference is available online at:
<http://www.ops.fhwa.dot.gov/publications/fhwahop12035/fhwahop12035.pdf>.

Design

Any proposed non-standard design feature (such as inadequate sight distance) will have to be approved by a Fact Sheet for Exceptions to Mandatory and/or Advisory Design Standards prior to implementation. Caltrans looks forward to the opportunity to review the full plan sets of proposed improvements.

Lead Agency

As the Lead Agency, the County of San Mateo is responsible for all project mitigation, including any needed improvements to the STN.


Encroachment Permit

Please be advised that any work or traffic control that encroaches onto the state ROW requires an encroachment permit that is issued by the Department. To apply, a completed encroachment permit application, environmental documentation, and five (5) sets of plans clearly indicating state ROW must be submitted to: Office of Permits, California DOT, District 4, P.O. Box 23660, Oakland, CA 94623-0660. Traffic-related mitigation measures should be incorporated into the construction plans during the encroachment permit process. See the website link below for more information: <http://www.dot.ca.gov/hq/traffops/developserv/permits/>.

Mr. Rob Bartoli, County of San Mateo
April 9, 2018
Page 5

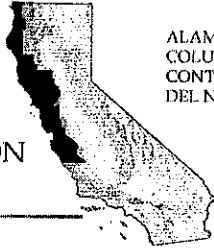
Thank you again for including Caltrans in the environmental review process. Should you have any questions regarding this letter, please contact Jake Freedman at 510-286-5518 or jake.freedman@dot.ca.gov.

Sincerely,


for

PATRICIA MAURICE
District Branch Chief
Local Development - Intergovernmental Review

CALIFORNIA
HISTORICAL
RESOURCES
INFORMATION
SYSTEM



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SONOMA
YOLO

Northwest Information Center
Sonoma State University
150 Professional Center Drive, Suite E
Rohnert Park, California 94928-3609
Tel: 707.588.8455
nwic@sonoma.edu
<http://www.sonoma.edu/nwic>

August 22, 2018

File No.: 18-0265

Mike Schaller, Project Planner
San Mateo County Planning and Building Division
455 County Center
Redwood City, CA 94063

re: PLN2018-00264 / APN 037-022-070 at 1993 Carlos Street, Moss Beach / Midpen Housing County

Dear Mike Schaller,

Records at this office were reviewed to determine if this project could adversely affect cultural resources. **Please note that use of the term cultural resources includes both archaeological sites and historical buildings and/or structures. The review for possible historic-era building/structures, however, was limited to references currently in our office and should not be considered comprehensive.**

Project Description: Construction of 71 affordable housing units consisting of approximately 22 two-story buildings holding 2-4 units each. The project will also include the general office, the manager's office, a community room, kitchen, computer room, laundry, and maintenance and storage areas. The project plan also includes several outdoor amenities, including: landscaping; a community garden; a children's play area; an upper and a lower green; BBQ areas; and a public walking trail. Approximately one-half of the site will be developed, and the remainder will remain undeveloped.

Previous Studies:

XX Study #3082 (Dietz and Jackson 1970), included approximately 100% of the proposed project area. Study # 25083 (Holson 2002) and Study #31887 (Busby 2005), both covered approximately less than 5% of the project. These studies identified no cultural resources (see recommendation below).

XX The project specific study included with this request, titled Cultural Resource Evaluation of the Cypress Point Project in Moss Beach by Archaeological Resource Management (June 2018) covered 100% of the proposed project area and identified cultural resources (see recommendations below).

Archaeological and Native American Resources Recommendations:

XX The proposed project area contains the archaeological site P-41-002599 (CA-SMA-431), the Cypress Point Site, a Native American habitation site. Based upon the results of archaeological testing and historic background study, as documented in (ARM 2018), the project area also contains historic artifacts from the WWII era. The entire project area should be considered sensitive for both prehistoric and historic archaeological materials. It is recommended to follow the recommendations and mitigation measures from ARM's 2018 report found on pages 8 – 11 of Appendix D, the Archaeological Treatment Plan for the Cypress Point Project (or pdf page 121 – 124 of the Cultural Resources Report Appendix A-E):

Mitigation Measure CUL-1: Additional Site Excavation

Mitigation Measure CUL-2: Archaeological Monitoring

Mitigation Measure CUL-3: Unanticipated Findings during Construction

Mitigation Measure CUL-4: Procedures for Discovery and Treatment of Human Remains

XX We recommend the lead agency contact the local Native American tribe(s) regarding traditional, cultural, and religious heritage values. For a complete listing of tribes in the vicinity of the project, please contact the Native American Heritage Commission at 916/373-3710.

Built Environment Recommendations:

XX The proposed project area contains unrecorded "foundations of structures, and other concrete features from the Point Montara Anti-Aircraft Training Center which operated during WWII" (ARM 2018: 9, 11). Prior to commencement of project activities, it is recommended that these resources be assessed and recorded on DPR 523 historic resource recordation forms, available online from the Office of Historic Preservation's website: http://ohp.parks.ca.gov/default.asp?page_id=1069 by a qualified professional familiar with the architecture and history of San Mateo County.

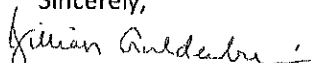
XX The 1939 USGS San Mateo 15' quad depicts a building in the proposed project area. Since the Office of Historic Preservation has determined that any building or structure 45 years or older may be of historical value, if these, or similarly aged buildings, are present then it is recommended that prior to commencement of project activities, a qualified professional familiar with the architecture and history of San Mateo County conduct a formal CEQA evaluation.

Due to processing delays and other factors, not all of the historical resource reports and resource records that have been submitted to the Office of Historic Preservation are available via this records search. Additional information may be available through the federal, state, and local agencies that produced or paid for historical resource management work in the search area. Additionally, Native American tribes have historical resource information not in the California Historical Resources Information System (CHRIS) Inventory, and you should contact the California Native American Heritage Commission for information on local/regional tribal contacts.

The California Office of Historic Preservation (OHP) contracts with the California Historical Resources Information System's (CHRIS) regional Information Centers (ICs) to maintain information in the CHRIS inventory and make it available to local, state, and federal agencies, cultural resource professionals, Native American tribes, researchers, and the public. Recommendations made by IC coordinators or their staff regarding the interpretation and application of this information are advisory only. Such recommendations do not necessarily represent the evaluation or opinion of the State Historic Preservation Officer in carrying out the OHP's regulatory authority under federal and state law.

For your reference, a list of qualified professionals in California that meet the Secretary of the Interior's Standards can be found at <http://www.chrisinfo.org>. If archaeological resources are encountered during the project, work in the immediate vicinity of the finds should be halted until a qualified archaeologist has evaluated the situation. If you have any questions please give us a call (707) 588-8455.

Sincerely,



Jillian Guldenbrein
Researcher

Cypress Point – Mid Pen Housing

PLN2018-00264

1993 Carlos St, Moss Beach

Civil Comments – Traffic

By Hanieh Houshmandi

Traffic Impact Analysis Review Comments 9/24/2018 for the July 31, 2018 submittal

Status of review: Revise and Resubmit.

- 1- Please provide LOS analysis and results for all movements and not just intersections as a whole, for all study intersections and scenarios.
- 2- Please provide all traffic counts and Synchro models electronically. Please include all assumptions and changes made to default values in the Synchro models.
- 3- Please provide all the appendices to the TIA document along with a detailed site plan.
- 4- The proposed turn restrictions as mitigation measures are not acceptable. Please provide alternate mitigation measures to address project significant impact at Highway 1 and Vallemar/Etheldore and Highway 1 and 16th.
- 5- The closure of Carlos Street to all motor vehicles other than emergency vehicles is not acceptable as a mitigation measure. Please provide other mitigation measure/s to address the project's significant impacts.
- 6- SamTrans stop bus relocation is not a County project. It is up to the applicant to coordinate with SamTrans and provide all the necessary approvals from SamTrans to the County for review and consideration before the TIA can be approved. Please provide alternate mitigation measure in case SamTrans does not approve the proposed re-routing.
- 7- Please provide documentation that supports the premise that a fully funded project is currently moving forward. Absent an assurance that a fully funded project is in the process of being implemented, the applicant will be responsible for mitigating the project's impacts.

- 8- If the applicant is proposing any TDM measures as mitigation, the measures need to be clearly defined and calculations shown as how many trips will be reduced by each measure and how that will impact the operations and LOS at the applicable intersection(s). In addition, please provide a monitoring measure to each of the TDM measures proposed and an alternate measure in case the monitoring shows that TDM is not as effective as assumed.

- 9- Revise and resubmit as noted above.

Address	1993 Carlos st Mid Pen Housing
PLN/BLD Case	PLN2018-00264
Date	8/15/18
Reviewer	Civil Review - Diana Shu dshu@smcgov.org

status	Disposition:
	Accepted
	Accepted with Conditions
X	Revise and Resubmit
	Pre app – see notes

Site Plan Submittal Checklist

The following information shall be shown on the plans:

A = Adequate

B/P Missing req'd for BLD/PLN

N/A = not required for this project

A	B/P	N/A	Requirements
X			Project Address, Property Owner's name, address, phone and email
x			Civil Engineer, Name, address, phone, email license number, expiration date
	P1		Plan Title: (eg: Grading and Drainage Plan)
X			Vicinity Map, Location Map; North Arrow, scale, abbreviations, legends
	P2		Fully dimensioned property lines. Show existing survey monuments, pipes, cross marks, etc. Including associated parcels
		X	Location of existing driveways within 100 feet of the corners of the property.
X			Locations of existing improvements, sidewalks, utilities, structures etc.
X			Locations of existing trees, pools, landscaping, etc.
X			Existing ground elevation
	P2		Proposed ground elevation
	P2		Proposed building pad, elevations
	P3		Driveway profile shall not exceed 20% combined slope. Elevation at property line = elevation at center line of road. Lower or raise garage as needed.
	P4		Identify all proposed improvements in the public right of way along the frontage of the property, if any. Provide detail of conform at driveway to road

County Required Stormwater Submittal Checklist – 10/100 year storms

The following information shall be shown on the plans:

A = Adequate

B/P Missing req'd for BLD/PLN

N/A = not required for this project

A	B/P	N/A	Requirements
	P4		All projects that modify existing runoff are subject to the county stormwater requirements
	P4		Hydrology Plan. Existing ground elevation, runoff flow directions, flow, and velocity, including the right of way along the property frontage and estimated flows onto this property from adjoining properties. Show drainage management areas, watershed boundaries.
	P4		Proposed ground elevation, runoff flow directions, flow, and discharge velocity (in report)
	P4		Proposed building pad, elevations, and downspouts – match Architectural Plans
	P4		Location of proposed stormwater improvements, elevations of rim and invert, location and elevation of drain inlets in right of way if any.
	P4		Locate sanitary sewer cleanout away from or downstream of stormwater inlets. Show inlet elevations. Keep 10 ft clear of septic fields.
	P4		Details of stormwater improvements and maintenance responsibilities for property owner

P4	Written report identifying the drainage areas, coefficients of runoff, slopes, pre and post runoff values, soil types, direction of flow, on a plan. Include in the package pipe profile with HGL/ EGL, detention times, depth to ground water, hydraulic sizing calculations, pollution source controls, vector controls, etc. Identify if preliminary or final calculations and plans. Sign and Stamp final Calculations.
P4	For projects with stormwater piping please submit hydraulic calculations and/or StormCAD/ AutoCAD storm files and specifications for pipe and apputenances
P4	Inlet and outlet protection design and calculations for velocity, riprap, etc.
P4	Design of swales, flow velocity, cross section, free board, overflow
P4	Detention time, infiltration rates, infiltration data from soils report
P4	Root barrier to protect county facilities
B4	Final landscaping plan - no conflicts with stormwater management features
P4	Show driplines for existing and proposed trees
B4	Landscaping with deep root systems shall not be placed on stormwater improvements unless they are an integral part of the stormwater pollution prevention measures. Verify that landscaping does not impact storage volumes in stormwater basins, swales, or other hydraulic structure. http://flowstobay.org/newdevelopment
B4	Site specific Erosion and Sediment Control measures shall be on a separate plan(s) from the permanent stormwater plan(s) REF: http://www.dot.ca.gov/hq/construc/stormwater/details.htm Construction Entrance needs 3"-6" sized crushed rock and min 12" thick x 50' long x 15' min width.
P4	Grading plan shall identify, amount of cut and fill; identify grades of proposed slopes over 15% and check for erosion potential

MRP Required Water Quality Submittal Checklist - 2 year storms

The following information shall be shown on the plans:

A = Adequate

B/P Missing req'd for BLD/PLN

N/A = not required for this project

A	B/P	N/A	Requirements
	P1		Complete the appropriate C.3-C.6 checklists for the project.
			< 2500 sq ft of new impervious – C6 required on all projects
			2500 sq ft < x < 10,000 sq ft of new impervious – source control
			> 5000 sq ft of new impervious for special projects – C3
			> 10,000 sq ft of new impervious – but not C3
	P1		BAHM file http://www.bayareahydrologymodel.org/ for projects involving more than 1 acre of impervious surface.

Permanent Stormwater Maintenance and Operation Submittal Checklist –C3 projects only

The following information shall be shown on the plans:

A = Adequate

B Missing req'd for BLD

N/A = not required for this project

A	B/P	N/A	Requirements (exhibits shall be in Black and White for recordation and reproduction)
	B1		Part A: Maintenance Agreement (8.5x11)
	B1		Part B: Legal Description (8.5x11)
	B1		Part C: Maintenance and Operations Plan (8.5x11 preferred 8.5x14 accepted) must be legible

		Exhibits for Part C: (Site Specific Information) http://www.flowstobay.org/newdevelopment
B1		Project Address, Property Owner's name, address, phone and email
B1		Plan Title: (Permanent Stormwater Drainage Plan)
B1		Vicinity Map, Location Map; North Arrow, scale, abbreviations, legends
B1		Fully dimensioned property lines – key index to stormwater facilities
B1		Proposed ground elevation, runoff flow directions
B1		Proposed building pad, elevations, and downspouts
B1		Location of proposed stormwater improvements, pipe size, catch basins, elevations of rim and invert, location and elevation of drain inlets if any.
B1		Details of stormwater improvements and maintenance requirements
B1		Routine maintenance logs for each item
B1		Annual Maintenance checklists for each item
B1		Equipment maintenance requirements as per vendor/manufacturer as applicable.

**Traffic
Submittal Checklist**

The following information shall be shown on the plans:

A = Adequate

M = required but missing

N/A = not required for this project

A	B/P	N/A	Requirements
	P0		Traffic Impact Analysis
	P0		Parking Analysis
	P3		Sight Distance
		X	Road Profile, alignment, and cross sections

**Grading
Submittal Checklist**

The following information shall be shown on the plans:

A = Adequate

B/P Missing req'd for BLD/PLN

N/A = not required for this project

A	B/P	N/A	Requirements
	P2		Site plan - existing
	P2		Site plan – proposed
	P2		Site plan – disturbed area
	P2		Cut and Fill profiles and volume calculations from CAD
	P2		Proposed Slopes greater than 15% shown on plans
	B4		Stockpile area and equipment laydown and contractor parking

**Right of Way Encroachment
Submittal Checklist**

The following information shall be shown on the plans:

A = Adequate

B/P Missing req'd for BLD/PLN

N/A = not required for this project

A	B/P	N/A	Requirements
	P2		Location of existing facilities: poles, curb cuts, parking restrictions, utilities, right of way monuments
	P2		Location of proposed improvements (including backflow preventer for water lines)
	P2		Details of the improvements
	P2		County Standard details used

P2		Traffic control plan – needs note on plans for contractors to manage equipment, staff parking, hauling, excavation work etc.
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**Other Misc
Submittal Checklist**

The following information shall be shown on the plans:

A = Adequate

B/P Missing req'd for BLD/PLN

N/A = not required for this project

A	B/P	N/A	Requirements
		X	Bridge Design Calculations, Hydrology, Clearance, Loading
	X		Check for easements, record agreements, etc.
		X	Flood Hazard Zone – show FEMA flood boundary on plan
		X	Attach previously approved set of site plans

**Conditions of Approval – See Accela
For Plan Checker**

The following information shall be shown on the plans:

R = required

NR = not required for this project

R	NR	Requirements
X		Plan Check Fees for review – hourly charges
		Conditions of Approval:
X		Mitigation Fees – for additional floor space
X		Stormwater Calcs for all new impervious or all redirected drainage
X		Encroachment Permits for any work in the right of way – sewer, water, power, etc.
X		Driveway Profile – for all new driveways
	X	Subdivision Agreement – for all subdivisions
		Right of Way Maintenance Agreement – for any facility in the right of way that is not a driveway
X		Stormwater Maintenance Agreement – for all projects requiring C3
		Other:
X		Workflow status
X		Upload Documents
X		Utility plan

Comments: Reviewed 7/31/18 e-submittal set with prelim traffic report, civil set, missing drainage calculations, and c3/c6 checklist.

P0) In concept, the project proposes 71 residential units. Traffic report submitted by Kittelson and Associates seems to indicate that the preferred access from Highway 1 is limited by physical features at the Carlos St intersection. If so, then the traffic will likely enter and exit from different points along Highway 1 to/from this site and this has to be included in the traffic analysis in the trip distribution diagram. Additional traffic comments on a separate document (later)

P1) Project appears to introduce more than 10,000 sq ft of impervious surface so it is subject to C3 stormwater treatment regulations for pollution control, and San Mateo County Stormwater Runoff requirements for flood control. Project proposes to install storm drains on San Carlos Avenue: point of discharge is unknown, maintenance of storm drain is unknown, etc.

B1) Project will require a O&M agreement

P2) project missing topographic and boundary survey sheet with references – please submit

P3) Please provide profile of point of access from Carlos Avenue, will also need sight distance analysis shown on the plans to determine if this is the best location for access for this project or if additional mitigation measures are required.

P4) Provide drainage calculations per county drainage guidelines and per NPDES C3/C6 guidelines

B4) provide proper BMP show on plans; separate permanent measures from temporary measures on plans

CALIFORNIA COASTAL COMMISSION

NORTH CENTRAL COAST DISTRICT OFFICE
45 FREMONT STREET, SUITE 2000
SAN FRANCISCO, CA 94105
PHONE: (415) 904-5260
FAX: (415) 904-5400
WEB: WWW.COASTAL.CA.GOV

**October 1, 2018**

Mr. Michael Schaller
San Mateo County
Planning and Building Department
455 County Center, 2nd Floor
Mail Drop PLN122
Redwood City, CA 94063

**RE: Cypress Point Affordable Housing, Moss Beach PLN2018-00264
(MidPen Housing Corporation)**

Dear Mr. Schaller,

We received San Mateo County's project referral, dated July 31, 2018 for the above-referenced Major Development. Thank you for the opportunity to provide you with our comments. A copy of our previous comment letter, dated August 3, 2017, is also attached for your reference. At this juncture, the County is soliciting comments on a future amendment to the LCP to allow for this specific project. The project referral specifically describes this request as being for a Local Coastal Program (LCP) Land Use map and General Plan Land Use map amendment, Zoning amendment, and coastal development permit (CDP) to rezone the parcel for the proposed affordable housing community from its existing Planned Unit Development(PUD)-124 designation to a new PUD designation. The Applicant's proposal would reduce the number of dwelling units allowed under the LCP from 148 (a mix of market rate and affordable) to 71 (all affordable). The County is required to submit an amendment request to the Commission for certification upon completing its local LCP amendment approval process. Tips on how to amend an LCP can be found at the following hyperlink:

https://documents.coastal.ca.gov/assets/la/TipsLCPAmend_Nov2013.pdf The County's LCP amendment submittal must include:

(a) A summary of the measure taken to provide the public and affected agencies and districts maximum opportunity to participate in the LCP or LRDP amendment process, pursuant to Section 13515 and Public Resources Code Section 30503; a listing of members of the public, organizations, and agencies appearing at any hearing or contacted for comment on the LCP or LRDP amendment; and copies or summaries of significant comments received and of the local government or governing authority's response to the comments.

(b) All policies, plans, standards, objectives, diagrams, drawings, maps, photographs, and supplementary data, related to the amendment in sufficient detail to allow review for conformity with the requirements of the Coastal Act. Written documents should be readily reproducible. An amendment to a land use plan or LRDP shall include, where applicable, a readily identifiable public access component as set forth in Section 13512.

(c) A discussion of the amendment's relationship to and effect on the other sections of the certified LCP or LRDP.

(d) An analysis that meets the requirements of Section 13511 or an approved alternative pursuant to Section 13514 and that demonstrates conformity with the requirements of Chapter 6 of the Coastal Act.

(e) Any environmental review documents, pursuant to CEQA, required for all or any portion of the amendment to the LCP or LRDP.

(f) An indication of the zoning measures that will be used to carry out the amendment to the land use plan (unless submitted at the same time as the amendment to the land use plan).

The proposed project is a new, affordable housing development in Moss Beach located at 1993 Carlos Street. The site is on an approximately 11-acre parcel currently zoned as PUD-124. LCP Policy 3.15a (1) designates the proposed project site as a potential location for the development of affordable housing. The Applicant's project proposal includes the construction of a community with 71 one-story and two-story residential units (16 1-BR, 37-2BR, and 18 3-BR). The proposed project comprises dedicated open space, public walking trails (as shown on the *Preliminary Site Plan* included with the referral), an approximately 3,200 square-foot community building, landscaping, community garden, children's play area, and barbecue areas. Since there is not yet proposed draft LCP amendment language to review, our comments will focus on the project's consistency with the LCP, as it is currently proposed. Please provide the LCP amendment language when it is available for review.

The LCP provides that the purpose of the PUD-124 zoning is specifically to govern the use and development of the subject parcel for a residential complex for affordable and market rate housing. PUD-124, Ordinance No. 3089 provides the approved Development Plan for the subject parcel (approved March 11, 1986). The project referral dated July 31, 2018 discusses the proposed project's impacts on visual, biological, and cultural resources, environmental justice, geology, hydrology, traffic, public services, and utilities.

Traffic and Public Access

The County's amendment will need to be consistent with the requirements of LCP Policy 2.52 and 2.53, in addition to the standards contained in the County's Traffic Impact Study from 2014. The Applicant's analysis in this submittal identifies significant traffic and transportation impacts that would result from the proposed affordable housing project. These include impacts to intersections with Highway 1 at California Avenue / Wienke Way, Carlos Street, 16th Street, and Vallemar Street / Etheldore Street. The impacts at the intersection of Highway 1 and Carlos Street are due in part to the design features including sharp curves that restrict the sight distance at that intersection. The proposed project would generate 37 weekday AM peak hour trips, 45 weekday PM peak hour trips, and 37 weekend Saturday midday peak hour trips. The traffic analysis indicates that the traffic that the proposed project will generate is not anticipated to decrease the performance of public transit, although it may result in an increase in pedestrians accessing bus stops located in the vicinity along Highway 1. The proposed project's impact to traffic along Highway 1 must be avoided, reduced, and/or mitigated. The Applicant proposes

Mitigation Measure TRAF-1A which would require the County to work with Caltrans to convert the intersection control from a two-way stop control at Highway 1 and California Avenue/Wienke Way into a roundabout or signalized intersection. The Applicant, while identifying a round-about as a mitigation option, makes an assumption that signalization is the preferable mitigation measure, since signalization at this intersection is listed in San Mateo County's draft *Connect the Coastside* report as a recommended improvement. We suggest that the Applicant analyze the round-about option to mitigate impacts. In addition to mitigating impacts to traffic a round-about could reduce the visual effect of a traffic signal in at this location.

The following will require an encroachment permit from Caltrans: Proposed mitigation measures at the intersection of Highway 1 and California Avenue/Wienke Way; turn movement restrictions proposed for eastbound and westbound approaches at Highway 1 & Vallemar Street / Etheldore Street (to right turns only during peak hours); and eastbound and westbound approaches at Highway 1 & 16th Street (to right turns only during the PM peak period). The proposed closure of Carlos Street between the proposed project driveway and Highway 1 to all motor vehicles except emergency vehicles is also located within Caltrans' jurisdiction and thus requires an encroachment permit. The Applicant does not discuss the likelihood that Caltrans will issue the necessary encroachment permits. We recommend that the Applicant coordinate early with Caltrans to evaluate the appropriateness and feasibility of these proposed mitigation measures.

Transit for Scale of Development

The Applicant has conducted several public workshops regarding the proposed project and input from the community is now reflected in the project, as it has been downscaled to from a total of 148 units to 71 units. According to the Summary for a workshop held in March 2016 the Applicant intends to cooperate with SamTrans to incentivize public transportation. We suggest that in addition to incentivizing public transportation that the Applicant work closely with the County to increase and improve the availability of public transportation in the area consistent with LCP Policy 2.56 that calls for increased service for Coastside Residents by encouraging SamTrans to expand bus service to and along the Coastside to improve transit service for residents. A discussion or analysis of a proposed project that has fewer than 71 units of housing should be performed to determine if impacts to traffic could be further reduced or avoided.


Wastewater Treatment Capacity

The Applicant indicates that there is no need to increase the size of the Montara Water and Sanitary District (MWSD) sanitary sewer facility as there is capacity to accommodate the additional demands for wastewater collection and treatment for the proposed project. Despite this indication, Resist Density (a local non-profit organization opposed to the project) has pointed out, based on its review of records obtained through a Public Records Act request that 101 sanitary sewer overflows have occurred between Half Moon Bay and Montara for the time period from 2011 to mid-2017. The Applicant states in the analysis of public services and utilities that the MWSD will continue maintenance activities on its sanitary sewer system and, that some of these maintenance improvements "could support sewer collection for the project." Future review of the amendment will need to consider consistency with LCP Policy 1.19 which requires adequate public services and infrastructure for new development in urban areas.

Michael Schaller
PLN2018-00264 (MidPen Affordable Housing)
October 1, 2018

Staff is available to answer any additional questions you may have. Please feel free to call me at 415-904-5292 or contact me via e-mail at renee.ananda@coastal.ca.gov if you have questions regarding our comments.

Sincerely,

A handwritten signature in cursive script that reads "Renée T. Ananda". The signature is written in black ink and is positioned above the printed name.

Renée T. Ananda, Coastal Program Analyst
North Central Coast District