



May 4, 2015

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Re: Comments on Connect the Coastside “Report #1”: San Mateo County Buildout Analysis and Traffic Projections Final Report – November 20, 2014

Dear James,

Thanks very much for providing me with a hard copy of this Report. It has made the job of reviewing and commenting much easier. I will also be submitting comments on the Draft Report #2: Evaluation of Transportation Alternatives to Address Buildout Deficiencies soon.

On behalf of Committee for Green Foothills (CGF), I have the following comments:

General Comments:

A general concern is that neither Report #1 nor #2 has presented a set of principles for this planning effort that will guide the Comprehensive Transportation Management Plan in developing necessary policies to address the cumulative impacts of buildout on the roads and highways in the Midcoast/Half Moon Bay Planning Area.

This planning effort should be a strategic, comprehensive and realistic approach that can be relied on to form the basis of changes to LCP policies as well as other initiatives and measures to ensure that public access to the coast is not adversely impacted by residential buildout.

The regional context of this study should also be included. The San Mateo County 1980 LCP found that a limiting factor on the capacity of Highway 1 in the Midcoast was future growth in Pacifica that competes with the Midcoast area for capacity on traffic heading north to San Francisco and northern San Mateo County. The Buildout Analysis and Traffic Projections Report should update this limiting factor. Similarly, the capacity of Highway 92 east of this Study Area, as well as the capacities of Highways 280 and 101 are likely additional limiting factors on commute traffic patterns, inasmuch as they are now experiencing significant delays. The regional context and limitations should be acknowledged.

Peak Recreation Period Traffic Analysis: The San Mateo County 1980 LCP based peak recreation traffic analysis on the ten top recreation days excluding extraordinary events such as the Pumpkin Festival. This was based on an analysis of weekend peak traffic periods, which were less than 10 days per year at that time. What are the assumptions of peak recreational traffic days for this study? Has the number of peak recreation days increased, and has the volume of traffic? If so, how can

future visitor access be accommodated? Peak recreation periods are highly responsive to weather, particularly lack of fog. Sunny warm spells on winter and spring weekends this year have brought extraordinary traffic to the coast. Impacts of climate change on peak recreational vehicle trips are another factor that should be analyzed in the upcoming Land Use Report.

Specific Comments:

1. The Introduction, page iii, should cite the specific wording of LCP Policy 2.53 so the purpose and rationale for the CTMP is clearly understood:

LCP Policy 2.53: "Develop a comprehensive transportation management plan to address the cumulative traffic impacts of residential development, including single-family, two-family, multi-family, and second dwelling units, on roads and highways in the entire Midcoast, including the City of Half Moon Bay. The plan shall be based on the results of an analysis that identifies the total cumulative traffic impact of projected new development at LCP buildout and shall propose specific LCP policies designed to offset the demand for all new vehicle trips generated by new residential development on Highway 1, Highway 92, and relevant local streets, during commuter peak periods and peak recreation periods; and policies for new residential development to mitigate for residential development's significant adverse cumulative impacts on public access to the beaches of the Midcoast region of San Mateo County."

"The plan shall thoroughly evaluate the feasibility of developing an in-lieu fee traffic mitigation program, the expansion of public transit, including buses and shuttles, and development of a mandatory lot merger program."

2. Level of Service Standards, page 7, and Travel Forecast and Buildout Level of Service, pages 66 and 67: The Report states that the San Mateo County LCP LOS standards are "D" for roadway segments during commuter peak periods, and "E" during recreation peak periods, and LOS "D" for intersections. (emphasis added). The San Mateo County LCP has never included a LOS standard for intersections. For this planning effort, it is important to continue to use roadway segments LOS standards as the key metric. Intersection LOS is based on wait time at intersections, which is skewed towards accommodating delays on side streets. In the Study Area, the main through volume is on the highway, and is much higher than volumes entering and existing side streets. Signalized intersections would generally relieve backups on side streets, which have relatively low volume, but would result in a lower overall LOS on the highway. Signalization of intersections along Highways 92 and 1 actually create delays on these highways, as reported by many residents. In contrast to traffic signals, roundabouts have less impact on throughput on the primary highway. A FHWA study also noted that roundabouts have 90% fewer fatalities, 75% fewer injury accidents, 35% fewer accidents, 35% fewer pedestrian accidents and 10% fewer bicycles vs. other types of intersections. The Coastal Act and LCP give priority to recreational and visitor access to the coast, and the fundamental charge for this study is to ensure that new residential development at buildout does not adversely impact coastal access, per LCP Policy 2.53. Analysis of LOS on roadway segments as well as end-to-end travel time, per the Highway 1 Safety and Mobility Study, is far more helpful in developing policies and programs to address potential mitigations of traffic.

3. Level of Service Standards, page 7: Footnote 3: The most recent Congestion Management Plan (CMP) is 2013, not 2011, please see: <http://ccag.ca.gov/programs/transportation-plans/congestion-management/>

4. Land Use and Buildout Analysis, pages 51 and 52 needs significant refinements.

(a) Potential Development Sites are unrealistic: All potential development sites were carefully evaluated during the extremely long (12 year) Midcoast LCP Update process, so were undoubtedly included in the existing buildout numbers. “Opportunity sites” are particularly problematic. More detail is needed as to exactly where were the “opportunity sites” that were identified, and what are the policy or physical constraints to development, particularly for housing. For “underutilized land”, using the ratio of assessed value to land value is not a good tool for this planning effort, as other planning considerations may make residential uses infeasible. For example, in the Princeton Waterfront Zoning District, a priority land use is open boat storage as this is an important component of the fishing industry. Open boat storage sites would logically be categorized as “underutilized land” since there are no buildings on them, yet without them the fishing industry would be adversely impacted. Similarly, airport land use restrictions make more intensive commercial uses and residential uses incompatible with the long term viability and safety of the airport.

(b) Legal constraints to achieving theoretical Buildout: further refinement of the Buildout analysis needs to take into consideration recent court decisions (Witt and Abernathy) which are applicable to the coastside’s antiquated subdivisions, as well as other parcels that were created without benefit of County approval.

(c) Parcels in hazardous areas, or completely covered with ESHA: The Midcoast unincorporated area has many antiquated subdivision parcels that, due to shoreline and cliff/bluff erosion, are now located under water in Princeton and Seal Cove and within Zone 1 of the Geotechnical Hazards Map of Seal Cove. In Zone 1, risk to development is considered to be extremely high, and it is recommended that no additional development be allowed in this Zone. Other constraints such as parcels that are entirely covered by ESHA and its buffer areas in the mapped Montecito Riparian Corridor need to be addressed. In Half Moon Bay, there are similar issues of constraints within the Planned Unit Development areas that make the theoretical buildout estimates within many of the PUDs unrealistic.

5. Figure 7: CTMP Study Area, page 53: The TAZ Boundaries as mapped are not in alignment with jurisdictional boundaries in many locations, including the HMB City Limits/ Urban-Rural Boundary, the Urban-Rural boundary around the Midcoast unincorporated area, and even along Highway 92 particularly at the Albert Canyon curve. This mismatch is likely due to incompatible mapping tools. As a result, it appears that some areas, such as the upper northeastern area of El Granada, which is urban and logically should be in TAZ 1616, has been inappropriately included within the adjacent rural TAZ 1994, which is almost entirely comprised of Rancho Corral de Tierra/NPS lands. This has resulted in a forecasted growth of 442 more housing units in the rural TAZ 1994, shown on Table 10, page 61, an impossibility based on the very small area in private ownership and rural zoning of either PAD or RM/CZ that limits residential densities to one residential density credit per 40-160 acres, which averages out to about one house per 110 – 120 acres based on approved land divisions on the coastside.

6. Table 10: Residential Development, page 61: There appear to be significant errors in the projected Buildout in the following TAZs:

TAZ 1617 (Rural North of SR 92) Existing Total Units: 4; Buildout projection: an additional 25 units. Please show how the projected buildout was arrived at. Most of the area is severely constrained by virtue of steep slopes, distance from a through all-weather road, and therefore the density analysis in the PAD or RM/CZ would likely be an overall average density close to the most restrictive overall density of one dwelling unit per 160 acres. The map and analysis of buildout should reflect the recently announced acquisition by Peninsula Open Space Trust (POST) of the 896-acre Scarper Peak property, most of which is in this TAZ.

TAZ 1618 (Rural Area South of SR 92) Existing Total Units: 87; Buildout Projection: an additional 22 units. This area includes the 160-unit Moonridge Farm Labor Housing community. The existing number of residential units should be adjusted accordingly.

TAZ 1993 (Montara) Existing Total Units: 1,067; Buildout projection: an additional 458 units. This is a rural area east of Montara, and therefore the zoning should be either PAD or RM/CZ. It appears that there is a section of the former "Devil's Slide Bypass Alignment" within this TAZ, and there are approximately 200 subdivided lots zoned R-1/S-17 within the Bypass Alignment. However per LCP Policy 11.33 the Bypass Alignment now has a "Linear Park and Trail Plan (LPTP) Overlay which requires development of a LPTP Overlay Specific Plan which will develop the details of a Linear Park and Trail along this former highway alignment that provides for park and trail recreational uses, open space, sensitive resource protection and restoration, agriculture, and other appropriate uses. The estimated 458 residential units is inconsistent with these constraints.

TAZ 1994 (Rural East of El Granada): see comment #4 above.

TAZ 1995 (Rural North of SR 92) Existing Total Units: 5; Buildout projection: an additional 18. This is a very large area with almost zero development potential. The vast majority of lands in this TAZ are within the San Francisco Peninsula Watershed, which is encumbered by Scenic Easement that prohibits residential development. Other lands in the TAZ include the Ox Mountain Landfill and Vulcan Quarry (formerly Pilarcitos Quarry) where landfill and quarry uses also preclude residential development. Finally the 524-acre Skylawn Cemetery is devoted to cemetery use, which also precludes residential development. It is highly unlikely that the relatively few remaining undeveloped private properties would generate 18 density credits.

7. Table 9 Residential Development in CTMP by Subarea, page 60 and Table 10 Residential Development in CTMP by TAZ are inconsistent in the comparison of rural lands due to the inclusion of portions of urban areas in the TAZ, particular TAZ 1994 where a total of 456 Existing Units plus projected Buildout of 898 Units greatly surpasses the projected Buildout of 152 Units in Table 9. (Note: The Table 10 Buildout Column subtitle for Total Units incorrectly says: (% growth); the numbers in this category are actually the number of projected additional residential units, not %. The subtitle should be corrected.)

8. Figures 7 CTMP Study Area, 8 (Half Moon Bay Subarea), and 11 (Rural Lands Subarea) all depict three small areas that are within the San Mateo County rural area as “within the Half Moon Bay Planning Area”. These areas are NOT within Half Moon Bay’s City Limits, the city’s Urban Boundary or its Sphere of Influence. As such, Half Moon Bay has no jurisdiction over these lands, nor will they be annexed to the City. The “Half Moon Bay Planning Area” category and maps should be deleted from the Study.

9. Buildout Analysis of Residential Development, pages 60 and 61 needs more explicit information as to how the numbers were arrived at. Table 10 projects buildout by TAZ, but also needs a breakdown as to the residential buildout by zoning in each TAZ which are available in Appendix B, but would be more useful if explained in Table 10.

Thank you again for the opportunity to comment, and thanks also to County staff and Connect the Coastside consultants for revising the public engagement process to provide for open dialog and interaction with the public, as well as ability for everyone present to hear comments, questions and answers. This open process where lots of ideas and comments are encouraged, questions can be answered and proceedings carefully documented, actually results in better understanding and acceptance by the public.

Sincerely,

A handwritten signature in black ink that reads "Lennie Roberts". The signature is written in a cursive, slightly slanted style.

Lennie Roberts, Legislative Advocate