



*Sensible planning and protection
for the San Mateo County Midcoast*

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Midcoast Community Council
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Dear Council Members,

Resist Density promotes the sensible planning and protection of the San Mateo County Midcoast. We also recognize the need for affordable housing in the County. However, MidPen's current Cypress Point multi-unit housing proposal would result in significant environmental impacts because it proposes to jam too many units into the wrong location.

MCC should oppose the project as currently proposed for the following reasons:

DANGEROUS TRAFFIC IMPACTS

The project application reveals that the project - as currently proposed - will result in numerous significant "and unavoidable" traffic impacts:

- 1) Project traffic will critically delay traffic at Highway 1 and California/Wienke.
- 2) Project traffic will critically delay traffic at Highway 1 and Carlos Street- the main access point to the Project from Highway 1. The project will make turns into and out of Carlos Street, as well as through traffic on Highway 1, substantially more hazardous.
- 3) Project traffic will critically delay traffic at Highway 1 and Vallemar/Etheldore.
- 4) Project traffic will critically delay traffic at Highway 1 and 16th Street.
- 5) Pedestrians crossing Highway 1 to access the coast or public transit are at great risk of being hit by oncoming traffic.

The Project – as currently proposed – will result in increased congestion and negative traffic impacts in violation of the Local Coastal Plan, and to the detriment of both the community and the new MidPen residents.

INCREASED DEMAND ON ALREADY FAILING SEWAGE PIPES

Over 100 sewage spills have occurred since 2011 according to review of public records. Even without MidPen's proposed development, the sewage pipe system serving this area has been grossly inadequate during storm events. Over 557,103 gallons of raw sewage have spilled into the Pacific Ocean and Half Moon Bay – almost entirely because of structural pipe failures. Further, tens of thousands of gallons of inadequately treated sewage has been released onto streets in residential neighborhoods within the City of Half Moon Bay, El Granada, Montara, Miramar, Moss Beach, and Princeton by the Sea.

The Project – as currently proposed – will add new sewage lines which only exacerbate the serious problems of the existing sewage lines.

PRESENCE OF HAZARDOUS MATERIALS

Historically, Cypress Point was a World War II military facility. An onsite incinerator may have been used to burn waste, without regard for the chemical composition of the substances being burned. A preliminary investigation of potential soil contamination revealed that there may be lead-containing

or other residues onsite from cartridges, gunpowder or munitions. Also, buildings which burned to the ground likely contained lead-based paint which may be present in soils on site. This, and the historic presence of an incinerator, represent a "recognized environmental condition." Subsurface sampling was recommended and a limited Phase II subsurface investigation was conducted.

Lead was detected at concentrations between 4.5 and 230 mg/kg in surface soils. Diesel petroleum was detected at a concentration of 1.3 mg/kg. Metals, including arsenic, barium, chromium, cobalt, copper, molybdenum, nickel, vanadium, and zinc, were detected at concentrations between 1.0 and 44 mg/kg. Total hexafurans were detected at a concentration of 2.78 picograms/gram. Further soil sampling has been recommended to further assess the horizontal extent of lead-impacted surface soils around 2 identified locations.

MidPen's preliminary environmental evaluation doesn't opine on whether the soil contamination constitutes a significant impact or not, but does reveal that the transport and use of hazardous materials during construction of the proposed project would be a significant impact requiring mitigation.

MIDPEN IGNORES THE NEED FOR PHASED DEVELOPMENT

The Local Coastal Plan limits the number of new dwelling units built in the urban Midcoast to a maximum of 40 units per year. The reason for this limit is to ensure that roads, utilities, public works facilities and community infrastructure are not overburdened by rapid residential growth. To date, there is no comprehensive transportation management plan for this area, and there is no evidence that sewage pipe reliability is adequate to avoid sewage overflows and water quality violations.

MidPen attempts to use a loophole for affordable housing, but the Local Coastal Plan is clear that this is not a guarantee that a proposed development is entitled to be approved.

INADEQUATE ENVIRONMENTAL REVIEW

MidPen's reports for its current proposal read more like advocacy pieces, rather than impartial environmental review.

Traffic Analysis

- 1) The traffic analysis avoids any consideration of the traffic impacts of proposed restrictions on traffic movements (roundabouts, new signal lights, closing Carlos St., left turn restrictions) proposed as mitigations.
- 2) Impacts are called "unavoidable" rather than including an adequate range of alternatives and mitigations.
- 3) There is no consideration of creating a multi-use path adjacent to Highway 1 or of creating high visibility Highway 1 crosswalks.

Sewage Analysis

The sewage analysis is artificially constrained to "dry weather flow" in evaluating the system's capacity to handle growth. MidPen proposes to add new users in a concentrated time period, yet the MidPen technical reports do not even acknowledge the troubled state of the existing sewage pipes.

Hazardous Materials

Assessment for the presence of asbestos containing materials was "out of [the] scope" of MidPen's Phase I report. However, asbestos materials were commonly used for buildings constructed in the 1940s. Most of the building foundations are still present on the project site and the site appears to be littered with building materials. Thus, the project site should be tested for asbestos in soil and groundwater.

To deal with the acknowledged significant impact of hazardous materials during construction, MidPen's preliminary evaluation promises a "Site Management Plan" will later be developed, but no details are provided regarding what standards this plan meet or why it will bring the impacts down to

a level of insignificance.

MCC is Being Asked to Make Recommendations Without the Benefit of Required Environmental Analysis

Amendments to the Local Coastal Plan (LCP) must comply with CEQA even though a technical EIR need not be prepared. As detailed above, MidPen has not provided analysis that complies with CEQA. Thus, the MCC is in the untenable position of making recommendations without knowledge of the full impacts of the proposed project, and potential mitigations.

Moreover, MidPen's proposal will require more than changes to the LCP: changes are required to San Mateo's County Zoning Map and zoning text amendment, an amendment to San Mateo County's General Plan, and proposed changes to the Planned Unit Development designation for this site. These zoning and General Plan changes are not merely technical changes; they will result in foreseeable physical environment changes, i.e. development of the site. Thus, adequate environmental review in the form of an EIR is needed for the public and MCC to evaluate the proposed project.

An EIR's purpose is to demonstrate to an apprehensive citizenry that the agency has in fact analyzed and considered the ecological implications of a proposed project. The technical reports which MidPen has prepared to date do not provide an adequate evaluation of potential project significant impacts, mitigations and alternatives.

Thank you for your consideration,

Resist Density Board of Directors