



Via Email

May 21, 2019

Midcoast Community Council
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Dear Midcoast Community Council Members,

Resist Density writes in regards to MidPen's April 15, 2019 updated application submission and the draft comment letter by Midcoast Community Council (MCC) dated May 22, 2019.

Insufficient Time for Adequate Community Review

As an initial matter, we believe that the short timeframe for MCC's response on this updated application is thwarting public involvement and understanding of the revised project analysis. We understand that the purpose of the MCC is to provide the local community with a more effective means to express its views to the County of San Mateo, particularly on matters of concern to the community. We understand that this item was added to the agenda just last Friday May 17. The updated application consists of over 1,500 pages. The alternatives analysis alone consists of 39 pages; the community does not have adequate time to consider and discuss the 6 newly presented alternatives. In addition, we understand that two of the MCC council members will not be attending the May 22 meeting. For these reasons, Resist Density believes it would be in the best interest of MCC and of the community to put this agenda item off at a minimum until MCC's next meeting on June 12.

Support for MCC's Draft Comment Letter

We have reviewed MCC's draft comment letter dated May 22, 2019. Resist Density supports a number of MCC's comments, including that

- (1) the height of the proposed MidPen project will constitute a significant adverse aesthetic impact and be inconsistent with community scale and existing PUD zoning,
- (2) MidPen has changed the local live-work project preference and that MidPen, not San Mateo County, is in control of this dimension of the project,
- (3) the cumulative impacts document is out of date and missing numerous other projects necessary for an adequate cumulative impact analysis, and
- (4) that there has been inadequate analysis of the impacts of 7,000 cubic yards of imported fill, including the construction-phase traffic and air quality impacts.

Contradictory and Confusing Information about the Project Approval Process

The MCC's draft May 22, 2019 comment letter also requested that MidPen list all changes proposed to the PUD Zoning. We would point out that MidPen and San Mateo County are providing conflicting information about the project approval process for this proposed project.



San Mateo County's website (<https://planning.smcgov.org/cypress-point-affordable-housing-community-project>) describes the "first phase of the project" as involving "consideration of the LCP amendment," but doesn't mention any County consideration of zoning changes, or amendment to the County's General plan.

MidPen's April 15, 2019 updated application submission, in the document entitled "Introduction And Project Description" states that MidPen is requesting that the California Coastal Commission – *not* San Mateo County - amend the LCP Implementation Plan and existing Planned Unit Development, and amend the LCP Land Use Plan and San Mateo County's General Plan to change the site's zoning designation.

That same document at Section 1.2.2 falsely claims that "San Mateo County has analyzed the full range of environmental conditions so that other agencies can rely upon it for CEQA compliance." Further confusing to the public is the assertion at Section 1.2.3 of the Introduction and Project Description that "the San Mateo County Planning and Building Department is acting as the applicant for the LCP Amendment before the Coastal Commission."

If San Mateo County has already analyzed the full range of environmental conditions and has determined that the Planning Department will be the applicant, what is the MCC being asked to do now after the fact? Moreover, how did San Mateo County reach this decision to be the project applicant without advising MCC and the public that it was prepared to do so?

Need for More Thorough Analysis of Traffic Impacts and Mitigations

We would ask MCC modify the draft letter's statement that there has been a "more thorough evaluation of traffic impacts and mitigations."

The proposed project will *still* result in five significant and supposedly "unavoidable" traffic impacts. That an environmental impact is unavoidable should be reason enough to recommend disapproval of this project as currently proposed. We are particularly concerned with the significant and unavoidable pedestrian safety impacts from this project. MidPen fails to mention that Carlos Street has no sidewalk, and that pedestrians who use the Sierra and Stetson Street sidewalks to follow MidPen's recommended route to the market or bus stop will face a steep slope on California Street and significantly more distance to and from the project site. Moreover, whereas a few months ago to address pedestrian safety, MidPen proposed rerouting bus lines. That modification has been dropped and no bus alternative is proposed by MidPen.

MidPen's mitigation analysis is still unnecessarily truncated and does not explain how the proposed mitigations will reduce the severe traffic impacts.

MidPen has not considered how the expected traffic delays will affect traffic circulation on adjoining neighborhood streets or pedestrian safety. The traffic delay at California/Wienke/Highway 1 is expected to reach over 124 seconds, 112 seconds at Vallemar/Etheldore Street/Highway 1, and 114 seconds at 16th Street/Highway 1. (Kittelsohn April 2019,



Table ES 2.) In addition, Carlos Street is proposed to be the only access point for non-emergency vehicles, i.e. everyday traffic. Clearly, this project will result in gridlock on neighborhood streets.

MidPen to date has failed to consider the obvious mitigation of reducing the proposed 71 residences and 213 residents in order to reduce traffic impacts. Nor has MidPen proposed to pay for the traffic signals and roundabouts being considered; MidPen seeks to have taxpayers pay for its poor planning.

We understand CEQA to require analysis of mitigations prior to project approval. Yet here MidPen continues to impermissibly defer mitigation analysis until after it gets its approvals. MidPen proposes to push an intersection control evaluation onto Caltrans, and to be completed after project approval during the design phase. Likewise, MidPen has impermissibly deferred discussion of mitigations in its proposed Mitigation Measures TRAF-1A and TRAF-1B.

TRAF-1B consists of a vague "Transportation Demand Management plan" which will not even be formulated for public review or MCC consideration until after project approval. TRAF-1B is proposed as the mitigation measure for seven of the identified significant traffic impacts, and the sole mitigation for "unavoidable" impacts TRAF-4, TRAF-3C, TRAF-3B, TRAF-3A and TRAF-2B. This poorly thought through measure includes one grocery cart that residents would walk one-mile round-trip coming back up a steep street, as little as one car share parking space, bus schedules, and the illusory "additional measures that may become available." As MidPen is forced to acknowledge, the effectiveness of this plan can "not" be guaranteed.

We also understand that CEQA requires all phases of a project be reviewed for environmental impacts, including the construction phase. As MCC recognizes, importing 7000 cubic yards of fill will result in over 690 truck trips. There has been no analysis of the impacts of these trips either on Highway 1 traffic or on local roads.

MidPen's Responses to Prior MCC Comments

We have also reviewed MidPen's responses to MCC prior comments of August 22, 2018 and September 26, 2018. Resist Density notes the following:

1. We support MCC's comment that "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," and notes that MidPen has failed to provide any response to this comment.
2. We support the MCC's comment that the proposed project ignores the need for safe crossing of Highway 1, and notes that MidPen has failed to provide any response to this comment or the need for a Parallel Trail.
3. MidPen has not responded to MCC comments that the proposed project height will be inconsistent with existing PUD zoning.
4. MidPen proposes to impermissibly defer analysis of existing building pad asbestos until after project approval. That analysis can occur now, and by law should.



5. MidPen refuses to use the "Connect the Coastside" a.k.a. the Comprehensive Transportation Management Plan as traffic thresholds, but elsewhere in its Traffic Impact Analysis relies on the draft Connect the Coastside report when it serves MidPen's purposes.
6. MidPen has side-stepped MCC's comments about inconsistent statements regarding income requirements for residents.

Resist Density's Prior Comments to MCC

Resist Density submitted comments to the MCC about this proposed project on September 6, 2018, which are attached. MidPen's April 2019 updated application submission does not change the relevance of Resist Density's prior comments.

Thank you for your careful consideration of these important issues.

Resist Density Board of Directors

CC:

San Mateo County Board of Supervisors

Michael Schaller, Project Planner

San Mateo County Planning Commission

Steve Monowitz, Community Development Director

Stephanie Rexing, CA Coastal Commission

Jeannine Manna, CA Coastal Commission

Board of Directors, Montara Water and Sanitary District

Beverli Marshall, SAM

Joe LeClair, Connect the Coastside

Katie Yim, Lance Hall, Stephen Haas, Elliot Goodrich, Mohammad Suleiman, Aye Myint, Teblez

Nemariam, Ken Puth, Department of Transportation

Jill Ekas, Community Development Director of City of Half Moon Bay

Half Moon Bay City Council

Lennie Roberts, Committee for Green Foothills