



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

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Via Email

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California Coastal Commission
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RE: Cypress Point – Second Application Referral

Dear Ms. Rexing, Ms. Manna, and Mr. Martinez,

Resist Density writes in regards to MidPen Housing's April 2019 second application submission and the California Coastal Commission's October 1, 2018 letter regarding this proposed project (<https://planning.smcgov.org/cypress-point-affordable-housing-community-project>).

We write to point out inconsistencies between what the Commission requested in October 2018 and MidPen's April 2019 submission. In addition, we write to express concern that MidPen appears to be impermissibly deferring the required analysis until its subsequent CDP submission or even after project approval, when it is reasonably foreseeable that the required LCP Amendment – if granted - will result in environmental impacts. Please consider that:

1. The proposed project's impacts to Highway 1 traffic are certainly not avoided or reduced. The proposed project will still result in five significant and *supposedly* "unavoidable" traffic impacts:

- 1) Project traffic will critically delay traffic at Highway 1 and California/Wienke (delay over 124 seconds);
- 2) Project traffic will critically delay traffic at Highway 1 and Carlos Street- the main access point to the Project from Highway 1;
- 3) Project traffic will critically delay traffic at Highway 1 and Vallemar/Etheldore (112 seconds);
- 4) Project traffic will critically delay traffic at Highway 1 and 16th Street (114 seconds);
- 5) The Project will increase the risk of pedestrians being hit by vehicles as they attempt to cross State Route 1.

2. The Cypress Point Traffic Impact Analysis – updated April 2019 (Document 23) asserts that Project traffic is not anticipated to decrease the performance of public transit - based on the



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claim that the majority of State Route 1 traffic movements experience little or no delay. The claim that there will be "little or no delay" to transit is undermined by the admission of four of the above five significant and "unavoidable" traffic impacts. Also, MidPen has also not considered how the above expected traffic delays will affect traffic circulation on adjoining neighborhood streets, and thus public transit performance given the routes of SamTrans buses through Moss Beach (Traffic Impact Analysis, Figure 4 on page 19).

3. The applicant has not analyzed the round-about option to mitigate impacts as the Commission suggested. Also, MidPen also has not proposed to pay for the traffic signals and roundabouts it previously suggested.
4. Resist Density questions whether in fact traffic impacts have been mitigated as required by law. MidPen's mitigation analysis is still unnecessarily truncated, does not explain how the proposed mitigations will reduce the severe traffic impacts, and impermissibly defers a number of mitigations until after project approval. 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 the Commission's 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.

5. The applicant has not discussed the likelihood that Caltrans will issue necessary encroachment permits, as the Commission suggested.
6. The applicant has not cooperated with SamTrans to incentivize public transportation or expand bus service.
7. While the applicant has included an alternative of fewer than 71 units of housing, the analysis claims that this alternative would have "the same" transportation and circulation impacts as the proposed project, but trip generation would be less. See Alternatives Analysis – Updated April 2019 (Document 8) Table 1 on page 24. Thus, this analysis omits discussion of whether traffic impacts *could be* further reduced or avoided by reducing the number of units or residents, as the Commission requested.



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8. As the Commission stated in its October 2018 correspondence, the LCP will need to be consistent with LCP Policy 2.52 and 2.53 among others. For the reasons stated above, Resist Density does not believe that MidPen to date has provided the information necessary for a traffic analysis and mitigation plan, as LCP Policy 2.52 requires.

Nor does MidPen's current vague "Transportation Demand Management Plan" come close to the comprehensive transportation management plan required by LCP Policy 2.53.

Midcoast Community Council's Comments on proposed Cypress Point development

<http://www.midcoastcommunitycouncil.org/affordable-housing/>

The Midcoast Community Council has made the following comments regarding the proposed Cypress Point development which we believe the Commission should consider in evaluating project impacts:

- 1) MidPen's cumulative impacts document is out of date and missing numerous other projects necessary for an adequate cumulative impact analysis (May 22, 2019 comment).
- 2) There has been no analysis of the traffic impacts of over 690 construction-phase truck trips to import 7,000 cubic yards of fill (May 22, 2019 comment).
- 3) The proposed project ignores the need for safe crossing of Highway 1 (August 22, 2018 comment).
- 4) MidPen refuses to use the "Connect the Coastside" a.k.a. the Comprehensive Transportation Management Plan as traffic thresholds (September 26, 2018 comment).

Thank you for your careful consideration of this proposed project.

Resist Density Board of Directors