



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

June 1, 2019

Via Email

Patricia Maurice
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**RE: Cypress Point – Second Application Referral
GTS # 04-SM-2017-00196**

Dear Ms. Maurice and Mr. Freedman,

Resist Density writes in regards to MidPen Housing's April 2019 second application submission and the California Department of Transportation's (Caltrans) August 29, 2018 letter regarding this proposed project. As background, the proposed project will *still* result in five significant and supposedly "unavoidable" traffic impacts. In addition, as discussed further below the Midcoast Community Council has submitted comments on MidPen's proposed Cypress Point development, which we believe Caltrans should consider.

Caltrans August 28, 2018 Letter

MidPen's Cypress Point Traffic Impact Analysis (April 2019) still fails to address issues raised by Caltrans, including:

1. Neither the Cypress Point Traffic Impact Analysis (April 2019) nor MidPen's Cover Letter Response to Comments references Caltrans' Strategic Management Plan 2015-2020 nor discusses reductions in Vehicle Miles Traveled (VMT), myopically focusing on the "number of vehicle trips," which excludes any calculation of vehicles miles travelled as a result of the proposed project
2. Caltrans commented that the applicant should further analyze alternatives for *improving pedestrian and bicycle access in the area*, specifically opportunities for improving pedestrian and bicycle crossing of State Route 1.

MidPen's Cover Letter Response to Comments does not provide this analysis, instead it only vaguely promises that project impacts will be addressed without providing any specifics.

Likewise, the Cypress Point Alternatives Analysis (April 2019) claims there will be the same pedestrian impacts for the three alternatives considered, but does not discuss alternatives for improving pedestrian and bicycle access in the area as Caltrans requested.



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MidPen does not commit to providing any pedestrian and bicycle crossing of State Route 1 – not even where the Connect the Coastside study proposed a striped pedestrian crossing with a beacon along State Route 1 at 16th Street. This despite that, according to the Cypress Point Traffic Impact Analysis (April 2019), the project would result in potentially significant impacts from an increase in pedestrians accessing bus stops located across State Route 1, and inadequate corner sight distance at Carlos Street and State Route 1 for pedestrians to see vehicles and drivers to see pedestrians.

Rather than undertake traffic calming measures or pedestrian crossings with beacons, MidPen now only suggests the cheaper (and likely less-effective) distribution of literature to discourage residents from crossing the highway to access the Pacific Ocean, the lighthouse, and southbound bus lines. Public safety impacts are of particular concern given that the northbound SamTrans route 17 bus requires walking along the shoulder of State Route 1 for approximately 0.15 miles. Similarly, the commercial area of Montara is just beyond (0.5 miles north), Montara Beach (1 mile north across State Route 1) and the Farallone View Elementary School (1.2 miles north). Given this, it is reasonably foreseeable that project residents including school children will attempt to walk along the highway to reach these destinations. Furthermore just south of the proposed project are the Coastside Market and the Moss Beach Children's Park (0.5 mile south) downhill on Carlos Street, a narrow road with no sidewalks from Sierra to Etheldore and the only road for vehicle access to the project. MidPen's Traffic Impact Analysis does not consider these public safety impacts or mitigations thereto.

Further, the Cypress Point Traffic Impact Analysis provides no discussion of public safety impacts to pedestrians – outside of the Carlos/Sierra and Carlos/Stetson intersections - from traffic gridlock in the neighborhood nor the acknowledged significant adverse traffic impacts. 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. (Kittelson 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.

The Cypress Point Traffic Impact Analysis (April 2019) avoids any discussion of impacts to bicycle riders, instead narrowly focusing on impacts to “bicycle facilities.” There is no discussion of the impacts of traffic gridlock and acknowledged significant adverse traffic impacts at multiple intersections on bicycle riders. This omission despite that the 2011 San Mateo County Comprehensive Bicycle and Pedestrian Plan identified planned bikeways through Moss Beach including (1) a Class I multi-use path near State Route 1 between Carlos Street and Main Street, (2) a Class II bicycle lane along Carlos Street, and (3) a Class III bicycle route along State Route 1.

3. Caltrans commented that MidPen should consider relocating the southbound bus stop so that it is across from the existing northbound stop at SR1 and 14th Street and providing a



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pedestrian hybrid beacon, as well as adequate pedestrian and bicycle access to/from project site.

MidPen avoids any response to the idea of relocating the southbound bus stop. Confusingly, MidPen responds that "MidPen's traffic consultant does not believe [sic] 16th or 14th Street would not be an optimal location for a pedestrian crossing."

4. Caltrans commented that MidPen must evaluate primary and secondary effects on pedestrians and bicyclists, travelers with disabilities, and transit users including the effect of proposed VMT mitigations.

In response, the Cypress Point Traffic Impact Analysis provides no discussion of impacts to travelers with disabilities, and does not mention secondary effects on pedestrian and bicyclists.

There is no discussion of the effect of traffic delays on bus transit users. Further, whereas a few months ago MidPen proposed rerouting bus lines to address pedestrian safety, that modification has been dropped and no bus alternative is proposed by MidPen.

5. Caltrans commented that MidPen should either provide mitigation or pay its fair share fee for impacts towards multi-modal and regional transit improvement.

The Cypress Point Traffic Impact Analysis (April 2019) includes no reference to fair share payments for MidPen's traffic impacts, nor discusses the benefits of an on-site shuttle. Also, MidPen has not proposed to pay for the traffic signals and roundabouts being considered.

6. Caltrans requested use of a SimTraffic model and Intersection Control Evaluation. Our understanding of CEQA is that impacts must be analyzed before project approval so that the public and agencies such as Caltrans can understand the effects and decision makers can evaluate the adequacy of proposed mitigations and alternatives.

MidPen has not undertaken the modeling and evaluation Caltrans requested; MidPen proposes to push the intersection control evaluation onto Caltrans. Also, MidPen appears to be impermissibly deferring this evaluation and modeling until after project approvals have been granted.

7. Caltrans encouraged measures to increase sustainable mode shares, but the only mention of shares in the Cypress Point Traffic Impact Analysis (April 2019) is sharing of parking spaces – which will do nothing to reduce VMT.

8. Caltrans commented that given the location and size of the proposed project, MidPen needed a robust Transportation Demand Management (TDM) Program to reduce VMT and greenhouse gas emissions, including but not limited to (1) "aggressive trip reduction targets with



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Lead agency monitoring and enforcement," (2) TDM "annual monitoring reports by an onsite TDM coordinator," (3) if VMT goals not met next steps to achieve those targets, (4) 10% reduced parking supply, (5) charging stations of electric vehicles, (6) carpooling parking spaces, and (7) real time transit information.

MidPen has included none of these measures in its proposed TDM Program, or acknowledged Caltrans' recommendations in either MidPen's Cover Letter Response to Comments or its Traffic Impact Analysis (April 2019).

Further, an actual "Transportation Demand Management plan" (Mitigation TRAF-1B) will not even be formulated for public review or Caltrans 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. As MidPen is forced to acknowledge, the effectiveness of this plan – which ignores Caltrans' suggestions - can "not" be guaranteed.

Midcoast Community Council's Comments on proposed Cypress Point development

The Midcoast Community Council has made the following comments regarding the proposed Cypress Point development which we believe Caltrans should consider in evaluating traffic 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

cc: California Coastal Commission