



November 2, 2015

Rob Bartoli, Project Planner  
San Mateo County Planning and Building  
455 County Center, 2<sup>nd</sup> Floor  
Redwood City, CA 94028

**Re: Workshop 3: Connect the Coastside (Comprehensive Transportation Management Plan) Alternative Development – Potential Forecast and Transportation Performance Standards**

On behalf of Committee for Green Foothills (CGF), thank you and the consultants for the Town Hall format for Workshop #3 on October 22, 2015. This format, with an initial presentation by Planning staff/consultants, and time allocated for the audience to ask questions and hear answers, was a great improvement over the previous format.

As you know, the CTMP is a requirement of LCP Policy 2.53, which states:

***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."***

Despite the clear mandate of this Policy, the CTMP Study appears to have significantly veered off track, and now proposes to focus on a time frame of 25 years. This shortened time frame will not adequately fulfill LCP Policy 2.53 requirement to analyze total cumulative traffic impacts from Residential **Buildout** and will likely postpone the day of reckoning, potentially evading the necessity of changes to land use and zoning.

The Workshop 3 Handout, page 7: "Changes in Project Scope", states: "the community wanted analysis of a more reasonable level of development potential than the Full Buildout". CGF is unaware of any such community request; certainly CGF did not request a shorter time frame, nor did we hear anyone else ask for it. Many people, including CGF, pointed out that the Study needed to address additional methods to reduce the Buildout, Please revise the Study to focus on the cumulative impacts of residential development at Buildout.

CGF in our May 4 comment letter has noted that other effective measures to reduce buildout include lot retirement; indeed this policy approach has been successfully implemented in Half Moon Bay (Ailanto/Pacific Ridge, Carnoustie). CGF continues to urge that the Study include lot retirement as another possible tool.

CGF's May 4 comment letter also asked that the Study analyze and incorporate legal constraints to achieving the theoretical Buildout, including recent court decisions regarding antiquated subdivisions (Witt and Abernathy) and recognition that many lots in the Midcoast are unbuildable due to their location within extremely high hazard areas (Seal Cove), under water (Seal Cove and Princeton), and within ESHA (Montecito Riparian Area). Have these constraints been included in the Study?

Policy 2.53 requires analysis of the total cumulative traffic impact of projected new development at LCP buildout. The Project Objectives as presented at Workshop #3 (page 5) should include a fifth Objective: "Recommend measures to reduce buildout if there are significant adverse cumulative impacts on highway capacity."

The "Constrained Forecast of Non-Residential Development Potential" (page 22) has a projected increase of Non-Residential Development in the Midcoast from 2,552 existing jobs in 2014 to 4,994 jobs in 2040, a 96% increase. This appears to be completely unrelated to the amount of land that is zoned for non-residential development. It also seems to be wildly inconsistent with the Non-Residential Buildout of 3,199 jobs projected in Table 8: CTMP Buildout Jobs Projections (Buildout Analysis and Traffic Projections Final Report, November 20, 2014). Appendix B, Development Assumptions by Subarea, does not include acreage within various zoning districts, or explain how a mixed use zoning such as CCR would allocate projected density of development between housing and jobs. Please provide details as to the specific sites/acreage identified, and methodology used to arrive at the Non-Residential Buildout projections. Please also provide assumptions regarding the impact of the forecasted Non-Residential Development on projected traffic from residential development at Buildout, i.e., would it increase or decrease the projected traffic volumes?

The estimate of Residential Buildout in the San Mateo County 1980 certified LCP was 6,728 units in the Midcoast (which included 528 units in the Midcoast rural area) and 5,500-6,500 in Half Moon Bay. The Updated Buildout Estimate (2006) in the Midcoast LCP Update (Table 6 in the Buildout Analysis and Traffic Projections Report, November 20, 2014) projected 6,757-7,153 units in the Midcoast (note: this did not include the Midcoast rural area, and no updated forecast was included for Half Moon Bay). The Residential Development in CTMP Study Area (Table 9 in the Buildout Analysis and Traffic Projections Report, November 20, 2014) projects Buildout of 7,094 units in the Midcoast (including 152 in the Midcoast rural area), and 5,258 in Half Moon Bay. Total Residential Buildout for the Midcoast Area including Half Moon Bay and the adjacent rural lands is projected to be 12,352 per Table 9. These Buildout numbers seem high, considering that several thousand acres of rural land (Rancho Corral de Tierra, Burleigh Murray Ranch, Johnston Ranch, etc.) and hundreds of lots within Half Moon Bay (Wavecrest, West of Railroad) have been acquired by land trusts or parks agencies since the 1980 LCP was certified. Do the Buildout numbers account for these acquisitions? Table 10: Residential Development in CTMP Study Area

by TAZ had serious errors which CGF pointed out in our comment letter of May 4, 2015. Were these errors corrected?

The Constrained Forecast of Development Potential (page 20) states that the growth control constraints for the Midcoast of 40 residential units per year per LCP Policy 1.23 have been used to develop the 25-year forecast. This is misleading because LCP Policy 1.23 allows the Board of Supervisors to amend the LCP to change the 40 residential unit per year limit once the CTMP has been adopted, and sewage overflows are addressed. This is yet another reason why using the 25-year forecast will simply confuse and obfuscate the basic issues that must be addressed per LCP Policy 2.53.

**For all the reasons outline above, CGF requests that the CTMP use Residential Buildout in both the Midcoast unincorporated area and Half Moon Bay rather than the 25 year forecast as the standard to evaluate the capacity of Highways 92 and 1 to accommodate future growth.**

CGF does not support using the suggested performance standards for pedestrian and bicycle modes of travel. These are primarily urban standards that are more applicable for cities with grid street patterns such as San Francisco, but are not well suited to an area with a highly constrained roadway system such as the Midcoast where the two primary highways are owned by Caltrans.

CGF also believes the Parking Standards of no more than 85% capacity utilization within ¼ mile of beaches would be extremely burdensome to evaluate, and difficult or impossible to implement, considering that there is generally very limited area to expand existing parking for beaches, and in many cases expansion could lead to unacceptable impacts on environmentally sensitive habitat areas or conversion of prime agricultural lands, as was noted in the 1980 San Mateo County LCP.

Thanks for the opportunity to comment, and we look forward to revisions to the CTMP to address our concerns.

Sincerely,



Lennie Roberts, San Mateo County Legislative Advocate

cc: Supervisor Don Horsley  
San Mateo County Planning Commission  
Steve Monowitz, Community Development Director  
Jeannine Manna, California Coastal Commission District Supervisor