

**CALIFORNIA COASTAL COMMISSION**

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April 5, 2016

Roberto Bartoli, Project Planner  
San Mateo County  
Planning and Building Department  
455 County Center  
Redwood City, CA 94063

**RE: Connect the Coastside – Evaluation of Recommended Alternative and Land Use Policy Options**

Dear Mr. Bartoli (Rob),

San Mateo County Local Coastal Program (LCP) Policy 2.53 (Transportation Management Plan) requires San Mateo County to develop a Comprehensive Transportation Management Plan (CTMP) to address the cumulative traffic impacts of residential development on roads and highways in the entire Midcoast, including the City of Half Moon Bay, by analyzing cumulative traffic impacts of projected new residential development at LCP buildout and proposing specific LCP policies designed to offset the demand for all new vehicle trips generate by new residential development and policies to mitigate its adverse impacts on public access to Midcoast Beaches. The Midcoast is severely constrained with respect to providing adequate transportation facilities. The LCP provides that a one percent growth rate (40 units per year) is necessary until a CTMP as described in LCP Policy 2.53, is incorporated into the LCP to make certain that the LCP is consistent with the Coastal Act with regards to provision of adequate public services. The CTMP, as an LCP requirement, is critical to the County's effort to address cumulative traffic impacts from development in San Mateo County's coastal area; particularly along portions of Highways 1 and 92 that experience heavy traffic and congestion. Further, LCP Policy 2.53 requires the County to evaluate the feasibility of certain measures to address traffic issues, such as a mandatory lot merger and lot retirement, the expansion of public transit, and an in-lieu fee traffic mitigation program.

DKS (in association with Dyett & Bhatia, Flint Strategies, and Nelson\Nygaard) prepared a report for the County of San Mateo, *Connect the Coastside Evaluation of Recommended Alternative to Address Potential Future Transportation Deficiencies* ("Evaluation"), dated February 4, 2016. Dyett & Bhatia (along with DKS) has prepared an analysis report *Land Use Policy Options for the County of San Mateo Midcoast Comprehensive Transportation Management Plan* ("Report"), dated January 2016, for the County of San Mateo. We thank you for the opportunity to review and comment on these documents.

The DKS Evaluation and Dyett & Bhatia Report describe recommendations for alternative modes of transportation such as increased / improved public transit (including buses and

shuttles), improved pedestrian and bicycling facilities, and land use policies as a way to reduce the impacts of future development on transportation. The Report states that the analysis is limited to the unincorporated San Mateo County portion of the Study Area; and mentions that the strategies presented could be ultimately implemented by the County, Half Moon Bay, or both. As further detailed below, we recommend that the County coordinate with the City of Half Moon Bay to discuss what process the City of Half Moon Bay could / would undertake to implement the proposed strategies for the reduction of transportation impacts of future development. Specifically, what process should the City of Half Moon Bay pursue to align its strategies with the County's, consistent with the County's LCP and CTMP?

In the discussion of a lot merger program, the CTMP report recommends re-authorizing the San Mateo County Board of Supervisors 2006 adopted Resolution No. 068386, Exhibit G which requires County staff to initiate a two-phase voluntary and mandatory lot merger program for applicable Midcoast properties that are zoned R-1, R-3, and RM-CZ. The Midcoast LCP update, approved as submitted by the Commission on August 8, 2012, incorporated the voluntary lot merger phase incentives (i.e. 250 square-foot, bonus, floor area and uncovered parking space) outlined in Resolution No. 068386 into the LCP's Implementation Plan (IP) in the S-105, S-17, S-94, and RM zoning districts, as well as the parking standards chapter. It is unclear from the report the extent to which the two-phase program has been implemented by the County staff thus far. In order to adequately evaluate the feasibility of a lot merger program, the report should address why the policy has not been implemented yet by County staff, examine the feasibility of successfully implementing the two-phase program in the future, and recommend solutions for a more successful program based off of case studies from other areas (e.g. use of a separate entity to implement and pay merger fees). The report should also examine expanding the program to other zoning districts that allow development of a detached, single-family residence. Further, the report should outline how the LCP IP would be further amended to implement a mandatory lot merger program. Successful implementation of a lot merger program as outlined in Resolution No. 068386 is critical as it was already assumed in the estimate of development potential in the CTMP and the LCP buildout analysis conducted through the Midcoast update.

The report proposes a lot retirement program for new residential subdivisions, similar to what has been done in recent Coastal Commission cases, but limits the donor site criteria to sites located outside of existing developed residential subdivisions. It is important to clarify that the lot retirement programs approved by the Coastal Commission were found to mitigate the impacts of new residential subdivisions only under the condition that development rights had been permanently extinguished on existing legal residential lots (equal to the number of residential lots created by any approved subdivision), or lots zoned to allow development of a detached single-family residence, such that the subdivision did not result in a net increase of existing legal lots for residential development within Mid-Coast Region of San Mateo County. As such, a lot retirement program similar to the Coastal Commission action would be focused around retirement of legal lots zoned for residential development. Commission staff agrees that retirement of lots outside of already developed subdivisions should be prioritized, but the criteria should not limit the potential for any residential lot in the Midcoast to be retired when a residential subdivision is proposed. If the County wants to propose retirement of non-residential

properties to mitigate the impacts of traffic from residential subdivisions, this action would need to be justified by further analysis. Any program recommending retirement of non-residential donor sites should evaluate potential impacts to Coastal Act priority uses such as agriculture, coastal-dependent, visitor serving recreation, and marine related uses.

It should also be noted that the Coastal Commission approved Ailanto project (A-1-HMB-99-022-A-1) required that an in-lieu mitigation fee of \$2.835 million payed to the City shall be used for the purposes of acquiring and retiring development rights on existing legal parcels in the City of Half Moon Bay. The settlement agreement stemming from the project between the Applicant, the City, and the Commission required the City to seek to amend its LCP to include a lot retirement program. This program was never implemented for reasons unknown to the Commission but there still exists a large amount of funding to pursue this program in the City. Any evaluation of a lot retirement program should examine potential barriers to implementation in the past, especially in Half Moon Bay, and evaluate the feasibility of implementing the program in the future using funds which already may exist. Further, the report should outline how the LCP IP would be further amended to implement a lot retirement program including a potential methodology for fee calculation and refining parameters for donor sites. It appears the evaluation does not include residential sites in the estimate of potential lots that could be retired. We recommend conducting an evaluation of only potential residential lots that could be retired if the County wants to pursue a program similar to that used in the Coastal Commission case examples. Finally, a large number of paper subdivisions in the City of Half Moon Bay exist particularly in the Planned Unit Development zoned areas. We recommend that the County coordinate with the City in the evaluation of potential residential lots that could be included in a lot merger or lot retirement program.

The Evaluation and Report state that having a transportation impact mitigation fee program (in-lieu mitigation fee program) could provide funding for transportation improvements in a systematic and predictable way. Additionally, a fee program could result in more development by facilitating transportation improvements needed to accommodate the growth. A fee program should not lead to a higher level of buildout than what is established by the transportation management plan, most importantly, as based upon the buildout projected in the LCP. Recommendations for the traffic fee mitigation program should include a methodology for rate calculations. The City of Half Moon Bay currently charges a traffic mitigation fee per application. We recommend that the CTMP examine how these fees have been used by the City and whether they have been successful in implementing measures to mitigate for traffic impacts from development projects.

Caltrans is currently required to consider future re-alignment of Highway 1 as an option to address sea-level rise and ongoing erosion problems along the coast, particularly at Surfer's Beach, in San Mateo County. Caltrans' options for Highway 1 include relocation of the highway further inland. We suggest that this be factored into the CTMP alternatives, for vehicle, bicycle, and pedestrian travel along the San Mateo's coast. The effect Sea-level Rise will have on the options identified for the CTMP must be also be evaluated or discussed. Lastly, we recommend

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the report evaluate the potential impacts to sensitive species or habitats which may result from the expansion of roadways or shoulders.

We look forward to the next phase of this process. Please feel free to contact me via e-mail at [rananda@coastal.ca.gov](mailto:rananda@coastal.ca.gov) or call me at 415-904-5292 if you have questions regarding our comments.

Sincerely,



Renée Ananda, Coastal Program Analyst  
California Coastal Commission  
North Central Coast District

CC: Lennie Roberts, Committee for Green Foothills  
Ina Gerhard, Chief Caltrans, District 4 Office of Transit & Community Planning  
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