



April 20, 2016

Rob Bartoli, Project Planner
San Mateo County Planning
455 County Center, 2nd Floor
Redwood City, CA 94063

Re: Comments on 3-10-2016 Draft Report Evaluation of Recommended Alternatives to Address Potential Future Transportation Deficiencies

Dear Rob,

On behalf of Committee for Green Foothills (CGF), thank you for the opportunity to comment on the Draft Report for this important planning effort. This is CGF's third letter.

The April 6, 2016 Workshop #4 at the Half Moon Bay Yacht Club unfortunately did not provide adequate time for a detailed presentation of the recommended Transportation Alternatives and Land Use Policy Options, as well as allowance for questions/comments by the 60 or so members of the public. As a result, public participation in the Workshop was given short shrift. As this planning effort involves both policy issues and technical details, contained in numerous background documents, it is vitally important that all assumptions and implications be fully explained, acronyms spelled out for those who may not be familiar with transportation and planning terminology, and provision must be made for interested members of the public to have ample opportunity to comment.

The purpose of this planning effort continues be inadequately addressed. LCP Policy 2.53 includes the requirement for the Comprehensive Transportation Management Plan (CTMP) to propose specific LCP policies that will mitigate for its significant adverse cumulative impacts of new residential development at Buildout on the capacity of Highways 1 and 92 to allow the public to access the coast and beaches of the Midcoast region. Merely accommodating the projected residential buildout through highway improvements and other modes of transportation, is insufficient. The Coastal Act mandates that new development, particularly residential development, shall not interfere with the public's right to access the coast. The CTMP must include methods to ensure that the public access and recreation policies of the Coastal Act are complied with, and that there is sufficient highway capacity for visitors to access the coast.

Information is lacking regarding the equivalence of the proposed Delay Index standard of 2.0 and 3.0 to the current LCP Roadway Segment LOS Standard. The Executive Summary (page 4) recommends changes to the method of evaluating traffic impacts from new development by substituting a new Delay Index for Roadway Segment LOS. CGF is concerned that there is no information provided as to the comparability of the proposed Delay Index to the existing LCP Roadway Segment LOS. Without this information, it is impossible to evaluate whether the CTMP will adequately comply with LCP Policy 2.53. The Summary of Deficiencies

Identified for Future Conditions - Roadway Segment Level of Service (pages 16-17) states: ***“Under Buildout conditions, the entirety of Highway 1 within the Midcoast would not meet the existing roadway segment LOS standard as defined in the Midcoast LCP based on the volume of traffic the roadway is designed to handle.”*** If the Delay Index standard is used, per Table 1, page 19, there is a magical change to this conclusion. The entire Highway 1 segment from 1st Street in Montara to Mirada Road (HMB city limits) complies with the Delay Index Standard under “Buildout” Conditions (Table 1, page 19). Changing the standard therefore simply masks the problem and avoids facing the necessary measures to address the problem. Even today, people experience daily significant delays throughout the Midcoast during peak commute hours on Highway 1, as well as good weather weekends year-round, so the Delay Index standard is not reflective of actual experience today or in the future.

The Delay Index standard is artificially lowered by adding Class II bike lanes. CGF is also greatly concerned that by proposing to designate Class II bike lanes along Highways 1 and 92, the Delay Index standard would be changed from 2.0 to 3.0 (Executive Summary, page 6). This means that a delay of three times the normal travel time becomes acceptable on any particular highway roadway segment. This further reduces the need to address the fundamental issue of the impacts of buildout on highway capacity, particularly during peak recreational periods, as required by LCP Policy 2.53. There is already a paved shoulder along most of Highway 1 that is used by cyclists; most of the shoulder is at least five feet wide, and therefore meets the Class II criteria if there are no curbs and gutters. Adding curbs and gutters will create additional requirements to comply with stormwater runoff control requirements. Would designating Class II bike lanes along the unincorporated segment of Highway 1 have any impact upon the ability of the County to obtain funding for the Parallel Trail? The Parallel Trail, which is already called for in the Safety and Mobility Studies, will provide a convenient facility for people who live on the east side of Highway 1 to get to schools, neighborhood services, and jobs without crossing Highway 1, and therefore should be given high priority as an alternative transportation facility that reduces the need for crossings of Highway 1.

The Constrained Forecast time frame of 25 years is inadequate. The Executive Summary (pages 4 and 5) et seq. continues to use the Constrained Forecast of Development Potential based on 40 residential units per year in the Midcoast to the year 2040 rather than full Buildout. This has the effect of obscuring the impacts of full Buildout on the capacities of Highways 92 and 1, particularly during peak recreational periods, as required by LCP Policy 2.53. As CGF has noted in previous comments, relying on growth control constraints of 40 residential units per year 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. Please use full Buildout as the standard for this study.

The proposed Pedestrian Environmental Quality (PEQI) and Bicycle Environmental Quality (BEQI) Standards are urban standards that are more applicable to 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, as CGF has noted in previous comments.

These standards should not be used for the study area. Appendix D has a boiler plate list of pedestrian and bicycle improvements that are “needed” to meet the PEQI and BEQI Standards, many of these are nonsensical when applied to the actual roadway segment.

Specific comments on Recommended Alternatives:

Roadway and Intersection Improvements: Highway 1 and Cypress Avenue (page 26) states that analysis of a roundabout did not show any improvement of LOS. Please provide more info as to how the Study arrived at this conclusion. Signalization at this intersection will cause new delays on Highway One. A roundabout here would keep traffic moving around the circle, would dramatically reduce accidents, would help define the “village” of Moss Beach, and is vastly preferable to a signal. Highway 1 and California (page 25) states that a roundabout “would not work at this location without significant study” and a large footprint. These are not sufficiently compelling reasons to discard consideration of a roundabout. Please refer to the Safety and Mobility Study initial study and recommendation for a Roundabout (attached).

Unincorporated SR 92 at Highway 35 East (page 27): This intersection, more appropriately titled Highway 92 and Lower Skyline, is outside the Coastal Zone. The proposal for a double lane roundabout could be problematic here depending upon whether it is necessary to acquire additional ROW. Due to this intersection’s proximity to the Crystal Springs Reservoirs, it is highly likely that expensive stormwater runoff treatment will be required. There are also likely sensitive habitats and listed species issues at this location. The land is owned by the City and County of San Francisco, and highway projects such as this are also subject to approval/concurrence by the Golden Gate National Recreation Area, per the January 1, 1969 Grant of Scenic and Recreation Easement. CGF does not oppose a roundabout at this location, but there are significant feasibility and design considerations that need to be addressed.

Safety and Circulation Projects (page 27): Passing and climbing lanes on eastbound SR 92 between the “Landfill Road” also known as Digges Canyon Road, and Pilarcitos Quarry Road, would not improve safety or circulation in this segment. Left turn lanes with longer accel/decel lanes should be the recommended project here. Trucks entering and exiting the quarry and landfill need longer accel/decel space in the center lane, and would present conflicts with traffic in the center passing lane if a continuous passing lane were constructed. There is only a very slight uphill grade in this segment, so characterization of this project as “uphill passing” is erroneous. The Pilarcitos Quarry Expansion permit EIR specified an accel/decel lane as mitigation for traffic impacts, but Caltrans requested that these improvements be deferred until there was a more comprehensive plan. The map of this project (Project 20) depicts a different segment (between the Quarry access road and the Pilarcitos Creek Bridge) than the text (between the “Landfill Road” and the “Quarry Road”).

The proposed Kehoe Avenue Signal can be avoided entirely if the HMB proposed improvements and signalization at Terrace Avenue/Grand Boulevard/Highway 1) include modifications to the frontage road so Kehoe traffic is accommodated at this intersection.

Striped pedestrian crossings with beacons (page 31): flashing beacons are not consistent with the rural character of the Midcoast. Center islands with striped crossings are preferable, and are consistent with the Midcoast Safety and Mobility Studies.

Parking Improvements (page 34) suggests implementation of a Coastside Beach Shuttle to reduce the parking load at beach lots. A Beach Shuttle could also potentially benefit businesses where the parking lot is located. An effective traffic reducing Shuttle, already spelled out in the LCP, would bring weekend beach visitors from designated parking areas on the Bayside, such as at CSM or companies that don't use their parking lots on weekends.

Roadway and Intersection Improvements (page 37) propose signals at California Avenue/Highway 1 and Cypress Avenue/Highway 1. A better solution for both these intersections would be a Roundabout as previously stated. Roundabouts are safer, with 75% fewer injury accidents and 90% reduction in overall fatalities. They keep traffic moving on all intersection roadways, albeit more slowly than free flow conditions, but drivers strongly prefer to be moving rather than sitting and waiting for a signal. In Moss Beach, Roundabouts will help define the "village" character of the community. Pedestrians and cyclists can cross one lane at a time, with islands, which improve safety for them as well as vehicles. There is more than adequate Right of Way in this stretch of Highway 1 for Roundabouts at California and Cypress.

Safety and Circulation (page 41) suggests that a defined curb and paved shoulder along Highway 1 should be provided. Curbs along Highway 1 are not consistent with the more rural feel of Highway 1, and will tend to concentrate runoff in specific locations, necessitating expensive drainage and water quality controls. Left turn lanes on Highway 92 at Berta's, Lemos, and the Half Moon Bay Nursery will potentially necessitate acquisition of ROW, and any required widening will also trigger costly drainage and stormwater runoff controls.

Feasibility and Design Considerations (Appendix B) for the Parallel Trail (B4) states that the trail is not likely to be a low cost improvement due to the need for engineering, and "a lot of trees will need to be removed". With careful design that includes avoidance of sensitive habitats and significant trees, this concern can be addressed. Some bridging over wetlands may be necessary.

Land Use Policy Options - Paper Subdivisions: There is no mention of the 200 plus antiquated subdivision lots on the former Devil's Slide Bypass Adopted Alignment Right of Way in Montara. The discussion of Parcel Legality under Witt and Abernathy should specifically acknowledge that depending upon the specific circumstances of the ownership Chain of Title, some parcels may not be entitled to receive either a COC A or B.

Figure 1: Sites Eligible for Potential CTMP Land Use Programs, Unincorporated Midcoast (Urban), please explain the category titled "Lots Eligible for Potential Open Space Set-Aside Program". The category titled "Paper Lots and Subdivisions" should include the 200 or so paper lots that are within the "Adopted Alignment" for the Highway 1 Devil's Slide Bypass as referenced in the previous comments re: Paper Subdivisions.

Figure 2: Sites Eligible for Potential CTMP Land Use Programs, Unincorporated

Midcoast (Rural) Please explain the category titled "Lots Eligible for Potential Lot Merger Program". In 1979, the County merged all parcels under common ownership that were less than 160 acres in size. The adopted LCP for the Rural Area has an allowable residential density (based on a Density Matrix) of one house per 40 – 160 acres. Land divisions that have been approved in the rural area over the years, have averaged 100 acres in size. There is no practical possibility that any remaining parcels in the rural area would be eligible for a lot merger program.

Mandatory Lot Merger: The Report (page 4) proposes a voluntary merger program, which would simply delay the implementation of a mandatory program. Since the Midcoast LCP Buildout numbers rely on mandatory mergers of substandard lots, a mandatory program should be adopted immediately.

Parcel acquisitions for parks and open space purposes: As the Midcoast population continues to grow, additional parks and open space lands for new residents will be needed. Undeveloped privately owned lots adjacent to Mirada Surf West along Magellan, privately owned parcels within the Burnham Strip, undeveloped privately owned parcels along Cypress Avenue west of Airport that could help provide parking for the southern area of Fitzgerald Marine Reserve, and undeveloped privately owned parcels adjacent to the Pillar Point Marsh in Princeton, are some suggested possibilities.

CGF supports the well researched and detailed comments submitted by the Midcoast Community Council, and we would like to incorporate those comments by reference.

Thank you for the opportunity to comment.

Sincerely,



Lennie Roberts, Legislative Advocate

cc: Supervisor Don Horsley
San Mateo County Planning Commission
Steve Monowitz, SMC Community Development Director
Joe LaClair, SMC Planning Services Manager
Jeannine Manna, CCC District Director
Renee Ananda, CCC Coastal Program Analyst
Chris Johnson, Chair, Midcoast Community Council

