

CALIFORNIA COASTAL COMMISSION

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**October 1, 2018**

Mr. Michael Schaller
San Mateo County
Planning and Building Department
455 County Center, 2nd Floor
Mail Drop PLN122
Redwood City, CA 94063

**RE: Cypress Point Affordable Housing, Moss Beach PLN2018-00264
(MidPen Housing Corporation)**

Dear Mr. Schaller,

We received San Mateo County's project referral, dated July 31, 2018 for the above-referenced Major Development. Thank you for the opportunity to provide you with our comments. A copy of our previous comment letter, dated August 3, 2017, is also attached for your reference. At this juncture, the County is soliciting comments on a future amendment to the LCP to allow for this specific project. The project referral specifically describes this request as being for a Local Coastal Program (LCP) Land Use map and General Plan Land Use map amendment, Zoning amendment, and coastal development permit (CDP) to rezone the parcel for the proposed affordable housing community from its existing Planned Unit Development(PUD)-124 designation to a new PUD designation. The Applicant's proposal would reduce the number of dwelling units allowed under the LCP from 148 (a mix of market rate and affordable) to 71 (all affordable). The County is required to submit an amendment request to the Commission for certification upon completing its local LCP amendment approval process. Tips on how to amend an LCP can be found at the following hyperlink:

https://documents.coastal.ca.gov/assets/la/TipsLCPAmend_Nov2013.pdf The County's LCP amendment submittal must include:

(a) A summary of the measure taken to provide the public and affected agencies and districts maximum opportunity to participate in the LCP or LRDP amendment process, pursuant to Section 13515 and Public Resources Code Section 30503; a listing of members of the public, organizations, and agencies appearing at any hearing or contacted for comment on the LCP or LRDP amendment; and copies or summaries of significant comments received and of the local government or governing authority's response to the comments.

(b) All policies, plans, standards, objectives, diagrams, drawings, maps, photographs, and supplementary data, related to the amendment in sufficient detail to allow review for conformity with the requirements of the Coastal Act. Written documents should be readily reproducible. An amendment to a land use plan or LRDP shall include, where applicable, a readily identifiable public access component as set forth in Section 13512.

(c) A discussion of the amendment's relationship to and effect on the other sections of the certified LCP or LRDP.

(d) An analysis that meets the requirements of Section 13511 or an approved alternative pursuant to Section 13514 and that demonstrates conformity with the requirements of Chapter 6 of the Coastal Act.

(e) Any environmental review documents, pursuant to CEQA, required for all or any portion of the amendment to the LCP or LRDP.

(f) An indication of the zoning measures that will be used to carry out the amendment to the land use plan (unless submitted at the same time as the amendment to the land use plan).

The proposed project is a new, affordable housing development in Moss Beach located at 1993 Carlos Street. The site is on an approximately 11-acre parcel currently zoned as PUD-124. LCP Policy 3.15a (1) designates the proposed project site as a potential location for the development of affordable housing. The Applicant's project proposal includes the construction of a community with 71 one-story and two-story residential units (16 1-BR, 37-2BR, and 18 3-BR). The proposed project comprises dedicated open space, public walking trails (as shown on the *Preliminary Site Plan* included with the referral), an approximately 3,200 square-foot community building, landscaping, community garden, children's play area, and barbecue areas. Since there is not yet proposed draft LCP amendment language to review, our comments will focus on the project's consistency with the LCP, as it is currently proposed. Please provide the LCP amendment language when it is available for review.

The LCP provides that the purpose of the PUD-124 zoning is specifically to govern the use and development of the subject parcel for a residential complex for affordable and market rate housing. PUD-124, Ordinance No. 3089 provides the approved Development Plan for the subject parcel (approved March 11, 1986). The project referral dated July 31, 2018 discusses the proposed project's impacts on visual, biological, and cultural resources, environmental justice, geology, hydrology, traffic, public services, and utilities.

Traffic and Public Access

The County's amendment will need to be consistent with the requirements of LCP Policy 2.52 and 2.53, in addition to the standards contained in the County's Traffic Impact Study from 2014. The Applicant's analysis in this submittal identifies significant traffic and transportation impacts that would result from the proposed affordable housing project. These include impacts to intersections with Highway 1 at California Avenue / Wienke Way, Carlos Street, 16th Street, and Vallemar Street / Etheldore Street. The impacts at the intersection of Highway 1 and Carlos Street are due in part to the design features including sharp curves that restrict the sight distance at that intersection. The proposed project would generate 37 weekday AM peak hour trips, 45 weekday PM peak hour trips, and 37 weekend Saturday midday peak hour trips. The traffic analysis indicates that the traffic that the proposed project will generate is not anticipated to decrease the performance of public transit, although it may result in an increase in pedestrians accessing bus stops located in the vicinity along Highway 1. The proposed project's impact to traffic along Highway 1 must be avoided, reduced, and/or mitigated. The Applicant proposes

Mitigation Measure TRAF-1A which would require the County to work with Caltrans to convert the intersection control from a two-way stop control at Highway 1 and California Avenue/Wienke Way into a roundabout or signalized intersection. The Applicant, while identifying a round-about as a mitigation option, makes an assumption that signalization is the preferable mitigation measure, since signalization at this intersection is listed in San Mateo County's draft *Connect the Coastside* report as a recommended improvement. We suggest that the Applicant analyze the round-about option to mitigate impacts. In addition to mitigating impacts to traffic a round-about could reduce the visual effect of a traffic signal in at this location.

The following will require an encroachment permit from Caltrans: Proposed mitigation measures at the intersection of Highway 1 and California Avenue/Wienke Way; turn movement restrictions proposed for eastbound and westbound approaches at Highway 1 & Vallemar Street / Etheldore Street (to right turns only during peak hours); and eastbound and westbound approaches at Highway 1 & 16th Street (to right turns only during the PM peak period). The proposed closure of Carlos Street between the proposed project driveway and Highway 1 to all motor vehicles except emergency vehicles is also located within Caltrans' jurisdiction and thus requires an encroachment permit. The Applicant does not discuss the likelihood that Caltrans will issue the necessary encroachment permits. We recommend that the Applicant coordinate early with Caltrans to evaluate the appropriateness and feasibility of these proposed mitigation measures.

Transit for Scale of Development

The Applicant has conducted several public workshops regarding the proposed project and input from the community is now reflected in the project, as it has been downscaled to from a total of 148 units to 71 units. According to the Summary for a workshop held in March 2016 the Applicant intends to cooperate with SamTrans to incentivize public transportation. We suggest that in addition to incentivizing public transportation that the Applicant work closely with the County to increase and improve the availability of public transportation in the area consistent with LCP Policy 2.56 that calls for increased service for Coastside Residents by encouraging SamTrans to expand bus service to and along the Coastside to improve transit service for residents. A discussion or analysis of a proposed project that has fewer than 71 units of housing should be performed to determine if impacts to traffic could be further reduced or avoided.

Wastewater Treatment Capacity

The Applicant indicates that there is no need to increase the size of the Montara Water and Sanitary District (MWSD) sanitary sewer facility as there is capacity to accommodate the additional demands for wastewater collection and treatment for the proposed project. Despite this indication, Resist Density (a local non-profit organization opposed to the project) has pointed out, based on its review of records obtained through a Public Records Act request that 101 sanitary sewer overflows have occurred between Half Moon Bay and Montara for the time period from 2011 to mid-2017. The Applicant states in the analysis of public services and utilities that the MWSD will continue maintenance activities on its sanitary sewer system and, that some of these maintenance improvements "could support sewer collection for the project." Future review of the amendment will need to consider consistency with LCP Policy 1.19 which requires adequate public services and infrastructure for new development in urban areas.

Michael Schaller
PLN2018-00264 (MidPen Affordable Housing)
October 1, 2018

Staff is available to answer any additional questions you may have. Please feel free to call me at 415-904-5292 or contact me via e-mail at renee.ananda@coastal.ca.gov if you have questions regarding our comments.

Sincerely,

A handwritten signature in cursive script that reads "Renée T. Ananda". The signature is written in black ink and is positioned above the printed name and title.

Renée T. Ananda, Coastal Program Analyst
North Central Coast District