

## **CALIFORNIA COASTAL COMMISSION**

NORTH CENTRAL COAST DISTRICT  
455 MARKET STREET, SUITE 228  
SAN FRANCISCO, CA 94105  
PHONE: (415) 904-5200  
FAX: (415) 904-5400  
WEB: [WWW.COASTAL.CA.GOV](http://WWW.COASTAL.CA.GOV)



# **F14a**

**LCP-2-SMC-20-0054-1 (Cypress Point PUD)**

**March 12, 2021**

**CORRESPONDENCE**

LAW OFFICES OF BRIAN GAFFNEY, A Professional Corporation  
446 Old County Road, Suite 100-310  
Pacifica, California 94044  
(650) 219 3187 Phone  
[brian@gaffneylegal.com](mailto:brian@gaffneylegal.com)

February 8, 2021

*Via Email*

Mr. Erik Martinez  
California Coastal Commission  
[erik.martinez@coastal.ca.gov](mailto:erik.martinez@coastal.ca.gov)

**RE: San Mateo County proposed Amendment to Land Use Plan  
and Implementation Plan – Cypress Point PUD (APN: 037-022-070)**

Dear Erik,

This office submits the following comments on behalf of Resist Density and Midcoast ECO regarding the proposed amendment to San Mateo County's Land Use Plan and Implementation Plan for the proposed Cypress Point PUD.

As we noted on October 16, 2020, San Mateo County certification submittal is incomplete as they have not provided the Coastal Commission with

(1) a discussion of the amendment's relationship to and effect on the other sections of the certified LCP. 14 CCR § 13552(c);

(2) 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. 14 CCR § 13552(d);

(3) copies or summaries of significant comments received by the County, nor of San Mateo County's response to those comments. 14 CCR § 13552(a).

On January 21, this office submitted to the Commission significant comments previously provided to San Mateo County from Pang Engineers, Matt Hagemann (SWAPE), Steve Powell (BioMaAS Inc.), Robert W. Emerick and Bryan Jessop. These comments are relevant to project traffic and transportation, soil contamination, sewage wastewater, and biological impacts, and the lack of adequate analysis of and mitigation for these impacts.

Submitted herewith are copies of comments submitted to San Mateo County by this office on January 22, 2020, June 8, 2020 and July 21, 2020. In addition, in an abundance of caution, we have attached the Coastal Commission's August 3, 2017 and October 1, 2018 comments on this project. Some of the issues previously raised are particularly relevant to the Commission's consideration of whether the proposed Amendment is consistent with the LCP and the Coastal Act.



## **I. LAW**

Here is our understanding of the principles governing this proposed application.

The approval of the proposed LCP amendment by the California Coastal Commission must comply with CEQA's substantive requirements. (Pub. Res. Code §§ 21080.5, 21080.9) This amendment will guide future growth and development which will result in reasonably foreseeable physical changes in the environment. Here, in fact, the stated purpose of the LCP Amendment is "in preparation for the future submittal of a coastal development permit application." June 3, 2020 San Mateo County Staff Report p. 2. Thus, the relevant question is the reasonably foreseeable effects of that development on the environment.

The Coastal Commission's review of an LCP amendment will also determine whether the proposed amendment is consistent with the basic Coastal Act goals to

- protect, maintain, enhance and restore the overall quality of the coastal zone environment and its natural and artificial resources;
- assure orderly, balanced utilization and conservation of coastal zone resources;
- maximize public access to and along the coast and maximize public recreational opportunities in the coastal zone consistent with sound resources conservation.

Coastal Act § 30001.5.

Moreover, the Coastal Commission will evaluate conformance with the requirements of Coastal Act Chapter 3 commencing with Section 30200. Pub. Res. Code §§ 30512 – 30514, 30200. These Chapter 3 policies represent the standards for judging the adequacy of an LCP. *McAllister v. Cty. of Monterey*, 147 Cal. App. 4th 253, 272 (2007).

## **II. The Proposed Project is Inconsistent with the Coastal Act and the San Mateo County LCP.**

For the reasons below, the proposed project is inconsistent with the Coastal Act and the San Mateo County LCP. The proposed Cypress Point project will not (1) protect, maintain and enhance the overall quality of the coastal zone environment and its resources, (2) assure orderly, balanced utilization and conservation of coastal zone resources or (3) maximize public access to and along the coast. Coastal Act § 30001.5 .

### **A. Traffic Impacts.**

The proposed project will result in increased congestion and negative traffic impacts in violation of the Coastal Act and the San Mateo County Local Coastal Plan.

The proposed project will result in numerous significant “and unavoidable” traffic impacts:

- 1) Project traffic will critically delay traffic at Highway 1 and Carlos Street- the main access point to the Project from Highway 1. The project will make turns into and out of Carlos Street, as well as through traffic on Highway 1, substantially more hazardous.
- 2) Project traffic will critically delay traffic at Highway 1 and California/Wienke.
- 3) Project traffic will critically delay traffic at Highway 1 and the intersection of Vallemar and Etheldore.
- 4) Project traffic will critically delay traffic at Highway 1 and 16th Street.

There has been no analysis yet of vehicle miles traveled.

Serious questions have been raised by peer review of MidPen’s flawed traffic discussion. MidPen’s own traffic consultant concluded significant and unavoidable project traffic impacts.

Midpen’s use of a ratio approach to justify traffic impacts – the project will only “incrementally” exacerbate these LOS F delays a by small percentage – violates well established CEQA law.

There has not been adequate consideration of cumulative traffic impacts which takes into account traffic from tourism, the Big Wave project, Best Western Hotel Half Moon Bay, Pacific Ridge, Mavericks Multiplex and other approved and reasonably foreseeable projects.

#### B. Public Access.

The proposed project will adversely impact public access to the coast and coastal resources in violation of the Act and the San Mateo County Local Coastal Plan.

Because the Project will likely increase pedestrian demand for crossing State Route 1 at unmarked crossing locations with inadequate sight distance, the Project will increase public access hazards, resulting in potentially significant adverse impacts.

#### C. Community Character.

Pursuant to LCP 3.13, new development providing significant housing opportunities for low and moderate income persons must contribute to maintaining a sense of community character by being of compatible scale, size and design. So too, under Coastal Act section 30251, permitted development must be visually compatible with the character of surrounding areas. Here, in contrast, the reasonably foreseeable development may include building heights which are out-of-character with the surrounding community. In addition, the development which is reasonably likely to follow from the proposed amendment will be out of character with Moss Beach where there are no other separate, clustered multi-unit building developments.

D. Discharge to Montara Creek and the Fitzgerald Area of Specific Biological /Significance.

Discharge of storm water runoff to Montara Creek and the Fitzgerald ASBS would violate Coastal Act provisions providing “special protection” to areas and species of special biological significance. Coastal Act section 30230 & 30240. Marine resources and the biological productivity of coastal waters must be sustained. Ibid. Runoff is required to be controlled and alteration of natural streams must be minimized. Coastal Act section 30231.

In addition, Coastal Act section 30253(b) requires that new development neither create nor contribute significantly to erosion of the surrounding area or in any way require the construction of protective devices that would substantially alter natural landforms. Discharge of storm water into Montara Creek and the Fitzgerald ASBS raises serious concerns about whether this discharge over time will lead to erosion or alteration of natural landforms.

The proposed project may have adverse impacts on a known ESHA in the project vicinity and impact sensitive habitat. It is reasonably likely that a sewage pump station will be needed for the project, and if improperly designed could result in spills of sewage to waters of the United States. The 1985 EIR described the project site as within 50 feet of the ESHA Montara Creek. At its closest point, the project site is located about 750 feet from the coastline of the Pacific Ocean.

The Stevens Consulting Cypress Point Project Public Services and Utilities Report at Section 7.4.1 reveals that the project site slopes range from 10 percent to 50 percent, that there is no existing storm drain infrastructure on the property, and that “stormwater ultimately discharges to Montara Creek within the James V. Fitzgerald Area of Specific Biological Significance (ASBS) watershed area.” In addition to stormwater from the 11-acre project site, there is an additional one (1) acre of offsite runoff that drains through the project site and contributes to the overall drainage area.

There is expert comment that “there is a potentially significant adverse wastewater impact that should be evaluated further before project approval.” There is also expert comment that “of particular concern to project impacts on wetlands and riparian habitat, the BRA makes only vague reference to drainage being “directed away from” the adjacent creek. This contrasts with BKF’s May 2, 2018 Cypress Point Hydromodification Management Memorandum and the Stevens Consulting Cypress Point Project Public Services and Utilities Report which both state that excess stormwater runoff surface flows ultimately discharge to Montara Creek. The BRA should provide a more thorough description of the location, volume, and rate of drainage in order to adequately evaluate impacts to the adjacent Montara Creek and impacts to wetlands.

E. Minimizing Risks in Areas of High Fire Hazard.

The Coastal Act requires that new development minimize risks to life and property in areas of high fire hazard. The project site is located within a Community at Risk zone. There is only one road in and out of the proposed project site, and limited roads serving Moss Beach – all of which lead to Highway 1 only. The proposed project - by adding a minimum of 142 new vehicles (i.e. the number of un-covered parking spaces) to this tightly constrained area of Moss Beach – decreases traffic circulation in the event of an emergency. In addition, there has not been an analysis of water availability to fight fires in this Community at Risk zone that includes consideration of the reasonably foreseeable development.

F. Development Limited to 40 Units / Year in the Midcoast.

The Local Coastal Plan limits the number of new dwelling units built in the urban Midcoast to a maximum of 40 units per year. The reason for this limit is to ensure that roads, utilities, public works facilities and community infrastructure are not overburdened by rapid residential growth. In contrast, the reasonably foreseeable development as a result of the proposed amendment proposes to build all 71 units at once.

To date, there is no comprehensive transportation management plan for this area, and there is no evidence that sewage pipe reliability is adequate to avoid sewage overflows and water quality violations. In fact, over 100 sewage spills have occurred since 2011 according to review of public records. Even without MidPen's proposed development, the sewage pipe system serving this area has been grossly inadequate during storm events. Over 557,103 gallons of raw sewage have spilled into the Pacific Ocean and Half Moon Bay – almost entirely because of structural pipe failures. Further, tens of thousands of gallons of inadequately treated sewage has been released onto streets in residential neighborhoods within the City of Half Moon Bay, El Granada, Montara, Miramar, Moss Beach, and Princeton by the Sea.

The Project – as currently proposed – will add new sewage lines which only exacerbate the serious existing sewage problems. There is no evidence that sewage pipe reliability is adequate to avoid sewage overflows and water quality violations.

There has been no showing that the proposed project will be served with adequate water supplies and wastewater treatment facilities. LCP 1.19.

G. The Proposed Project Violates the Coastal Act Provisions Against Leap Frog Development.

The Coastal Act requires that new residential development must “be located within, contiguous with, or in close proximity to, existing developed areas able to accommodate it”, and “where it will not have significant adverse effects, either

individually or cumulatively on coastal resources.” Coastal Act section 30250. The reasonably foreseeable development will not be located within, contiguous with, or in close proximity to, existing developed areas able to accommodate it. Further, it is clear that reasonably foreseeable development will result in traffic, public access, emergency evacuation, hazardous material, and discharge impacts. Thus, the project violates the Coastal Act.

Also, where as here, existing or planned public works facilities can accommodate only a limited amount of new development, services to coastal dependent land use, essential public services and basic industries vital to the economic health of the region, state, or nation, public recreation, commercial recreation, and visitor-serving land uses shall not be precluded by other development. 30254. Yet, this proposed project precludes basic traffic, sewage, and water services to other developments.

### **III. The Project To Date Has Not Benefitted from Adequate Environmental Review.**

The County’s submission of the proposed Amendment to the Coastal Commission has not included adequate environmental review.

#### **A. The County’s Environmental Baseline Was Improper.**

San Mateo County reasoned that the changes before the San Mateo Board of Supervisors were limited to “reduction in density.” It was on this basis alone that the County concluded compliance with the California Coastal Act. The County ignored that impacts must be judged based on the baseline of the land in its current condition, not under an adopted but never implemented plan.

The baseline for a CEQA significance determination should normally be the existing physical conditions in the project's vicinity, not what was allowed under existing permits. (*Communities For A Better Environment v. South Coast Air Quality Management Dist.* (2010) 48 Cal.4th 310, 320-322; *Ctr. for Biological Diversity v. Dep't of Fish & Wildlife*, 62 Cal. 4th 204, 224 (2016).

Here, it is important that evaluation of the proposed project look at the traffic, sewage, discharge, public safety, biological and other impacts based on a baseline of undeveloped, de-facto open space, rather than comparing it to the existing but never implemented PUD-124 zoning for the site.

The County improperly evaluated evacuation and circulation, protection of coastal resources, compliance with the Coastal Act, impacts to archeological resources, vehicle miles traveled, erosion, traffic and cumulative traffic - by impermissibly pointing to the PUD-124 density rather than the existing setting as the baseline. On that skewed basis the County asserts that the proposed project will reduce impacts.

The County also failed to describe the physical environmental conditions in the “vicinity of the project” as required by CEQA Guideline 15125. For example, the “Biological Resource Assessment” at Appendix G states only that the project site does not contain habitat for the California red legged frog, and fails to describe if this federally threatened species exists in the adjacent Montara Creek, or if the area is within the critical habitat designation for the species.

The County’s evaluation of existing conditions also failed to mention or otherwise account for the environmental review conducted in 1985 on the same site for a different project. That County 1985 environmental document recognized the site as “prairie grassland” which includes native beach strawberry on the project site – which is classified as “locally unique” species in the San Mateo County LCP. The 1985 review also identified Montara Creek as within 50 feet of the project site.

B. There Has Been No Analysis of Emergency Evacuation and Public Safety Impacts.

There has been no analysis of the Project's impacts related to emergency evacuations in the event of a wildfire, landslide or other emergency.

The project site is located within a Community at Risk zone according to the San Mateo County’s Wildland Urban Interface Fire Threatened Communities Map. In addition, there has been no evidence by MidPen that there is enough water to fight a fire in the surrounding hillsides. There is only one road in and out of the proposed project site, and limited roads serving Moss Beach – all of which lead to Highway 1 only.

The proposed project - by adding a minimum of 142 new vehicles (i.e. the number of un-covered parking spaces) to this tightly constrained area of Moss Beach – decreases traffic circulation in the event of an emergency.

An agency must evaluate any potentially significant impacts of locating development in other areas susceptible to hazardous conditions including wildfire risk areas “as identified in authoritative hazard maps, risk assessments or in land use plans addressing such hazards areas.” CEQA Guideline 12126.6(a). “[W]hen a proposed project risks exacerbating those environmental hazards or conditions that already exist, an agency must analyze the potential impact of such hazards on future residents or users.” *California Bldg. Indus. Assn. v. Bay Area Air Quality Mgmt. Dist.*, 62 Cal. 4th 369, 377, 388 (2015).

C. There Has Been No Analysis of Project Impacts to Montara Creek and the Fitzgerald Area of Specific Biological Significance.

The County avoided any analysis of storm water runoff and project hydromodification, as well as the biological impacts of foreseeable discharges.



The 1985 EIR for a different project on the same site found that Montara Creek is located approximately 50 feet north of the project site. The Montara Creek riparian corridor is an Environmentally Sensitive Habitat Area (ESHA) as defined by the San Mateo County LCP. According to the Staff Report, the project site slopes from 189 MSL along the easterly boundary to 77 feet MSL at the northwest corner.

The May 2, 2018 hydromodification report prepared for Midpen by BKF revealed that surface runoff will discharge to Montara Creek within the Fitzgerald Area of Specific Biological Significance:

The existing site slopes range from 10% to 50% with the high point on the east side of the property and the low point at the northwest corner. There is no existing storm drain, sanitary sewer or known gas infrastructure on the property. Storm water runoff is assumed to percolate on site and excess runoff surface flows towards Carlos Street and 16th Street, ultimately discharging to Montara Creek within the James V. Fitzgerald Area of Specific Biological Significance (ASBS) watershed area. Beside the 11 acre property, an additional 1 acre of offsite runoff drains through the project site and contributes to the overall tributary drainage area.

Based on the increase in impervious surfaces with the proposed project, the increased flows off-site of storm water runoff, and project grading and demolition of existing buildings, it is reasonably likely that there will be increased storm water discharges to Montara Creek. Even assuming the retention basins are adequately sized, during the construction phase and immediately thereafter, these increased flows will likely discharge significant additional sediment levels into Montara Creek, the James V. Fitzgerald Area of Specific Biological Significance (ASBS), and the wetlands at the Pacific Ocean. In addition, if asbestos or other hazardous substances are present on this site, the discharges to the Creek, the ASBS and the wetlands may also contain these hazardous substances.

D. The County's Analysis of Traffic Impacts is Flawed.

1. Failure to Consider Construction Phase Impacts.

There has been no analysis of the traffic (and air quality) impacts of over 690 construction-phase truck trips to import 7,000 cubic yards of fill (MCC May 22, 2019 comment), or truck trips to remove any contaminated material from the project site. CEQA requires all phases of a project be reviewed for environmental impacts, including the construction phase. There has been no analysis of the impacts of these trips either on Highway 1 traffic or on local roads.

2. Failure to Address Traffic Concerns Raised by Caltrans.

MidPen's Cypress Point Traffic Impact Analysis (April 2019) failed to address issues raised by the California Department of Transportation's (Caltrans) August 29, 2018 letter regarding this proposed project, including omitting analysis of:

- Vehicle Miles Traveled (VMT)
- alternatives for improving pedestrian and bicycle access and Highway 1 crossing
- discussion of impacts to bicycle riders
- relocating the southbound bus stop and providing a pedestrian hybrid beacon
- travelers with disabilities
- effect of traffic delays on bus transit users.
- fair share mitigation for multi-modal and regional transit improvement
- Intersection Control Evaluation.
- sustainable mode shares
- a robust Transportation Demand Management Program to reduce VMT and greenhouse gas emissions.

E. There Has Been Inadequate Analysis of Project Impacts from Hazardous Materials.

Despite the presence of hazardous materials, there has not been an analysis of whether the impacts are likely significant.

MidPen's April 2019 submission included a Phase I Environmental Site Assessment and a Limited Phase II Subsurface Investigation. Those reports were not presented to the Coastal Commission.

Lead was detected at concentrations between 4.5 and 230 mg/kg in surface soils. Diesel petroleum was detected at a concentration of 1.3 mg/kg. Metals, including arsenic, barium, chromium, cobalt, copper, molybdenum, nickel, vanadium, and zinc, were detected at concentrations between 1.0 and 44 mg/kg. Total hexafurans were detected at a concentration of 2.78 picograms/gram. Further soil sampling has been recommended to further assess the horizontal extent of lead-impacted surface soils around 2 identified locations.

MidPen's environmental evaluation doesn't opine on whether the soil contamination constitutes a significant impact or not, but does reveal that the transport and use of hazardous materials during construction of the proposed project would be a significant impact requiring mitigation.

Assessment for the presence of asbestos containing materials inexplicably was determined to be "out of [the] scope" of MidPen's Phase I report. However, asbestos materials were commonly used for buildings constructed in the 1940s. Most of the building foundations are still present on the project site and the site appears to be littered with building materials. In fact, a November 1989 letter to the owner of the



project site reveals that there was asbestos abatement, and states that additional asbestos containing materials were detected in other areas of the property. Despite this, the project site apparently has not been tested for asbestos in soil and groundwater by MidPen or the County. Such testing should be conducted as part of a proper evaluation of potential impacts prior to approval of requested zoning, GP and PUD amendments.

F. The County's Analysis of Mitigation Measures Was Flawed.

CEQA requires analysis of mitigation measures prior to project approval. Yet the County has impermissibly deferred discussion of traffic, safety, and circulation mitigation measures until after approval of the LCP, zoning and PUD amendments.

Traffic impacts are called "unavoidable" simply because MidPen and the County have not undertaken an adequate analysis of potential mitigation measures.

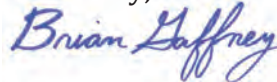
I. The County Did Not Evaluate Cumulative Impacts.

The County has not undertaken a cumulative impact analysis of the proposed Amendment.

The Coastal Act and Coastal Commission regulations require an analysis of the potential significant adverse cumulative impacts on coastal resources and on public access to or along the coast, due to existing and potentially allowable development proposed in the LCP. 14 CCR § 13511, subd. (b); Coastal Act 30250. Likewise, CEQA requires analysis of cumulative impacts – i.e. the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects. CEQA Guideline 15355.

Thank you for your careful consideration of these issues.

Sincerely,



Brian Gaffney

**LAW OFFICES OF BRIAN GAFFNEY, A Professional Corporation**  
446 Old County Road, Suite 100-310  
Pacifica, California 94044  
(650) 219 3187 Phone  
[brian@gaффneylegal.com](mailto:brian@gaффneylegal.com)

*Via Email*

October 16, 2020

Mr. Erik Martinez  
California Coastal Commission  
[erik.martinez@coastal.ca.gov](mailto:erik.martinez@coastal.ca.gov)

**RE: Request for Certification of Amendment to San Mateo County's Local Coastal Program- Cypress Point PUD (APN: 037-022-070)**

Dear Mr. Martinez,

This office submits the following comments on behalf of Resist Density and Midcoast ECO regarding the certification of an amendment to San Mateo County's Local Coastal Program for the proposed Cypress Point PUD.

We have reviewed the Coastal Commission's September 29, 2020 correspondence to San Mateo County and offer the following comments about additional ways in which San Mateo County's September 8 submittal is incomplete.

1. As part of its application, San Mateo County has not provided copies or summaries of significant comments received by the County, nor of San Mateo County's response to those comments. 14 CCR § 13552(a). San Mateo County has not provided the Coastal Commission with the comments of Resist Density, Pang Engineers, Inc., Matt Hagemann (SWAPE), Steve Powell (BioMaAS Inc.), Robert W. Emerick, Bryan Jessop or the comments submitted by this office beginning August 22, 2017. Further, San Mateo County has not provided the Commission with the County's response to those comments.

2. San Mateo County has not informed the Coastal Commission in its Cypress Point LCP Amendment Certification Summary of Public Participation, that MidPen's June 26, 2017 Pre-Application Submittal and the September 12, 2017 public workshop failed to comply with San Mateo County Zoning Regulation 6415.4, as they omitted

- a Vicinity Map showing all existing development within 500 feet beyond the site boundary;
- a Natural Setting Map, to scale, showing the location of existing environmental conditions on the development site, including drainage (perennial/intermittent creeks or streams), vegetative cover (amount and type of predominant trees and plants), sensitive habitats (wetlands, riparian corridors, and endangered species as defined in the General Plan), geological hazards (earthquake faults, landslide susceptibility areas), and scenic features (scenic road view corridors, public view sheds).

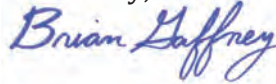
- a Site Plan showing utility easements;
- an explanation of the intensity of all proposed land uses and activities on the site, e.g., number of people or vehicles on the site at full utilization; and
- an explanation of the sequence or phasing of the proposed development.

3. San Mateo County has not provided the Coastal Commission with a discussion of the amendment's relationship to and effect on the other sections of the certified LCP. 14 CCR § 13552(c).

4. San Mateo County has not provided the Coastal Commission with 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. 14 CCR § 13552(d).

Thank you for your careful consideration of these issues.

Sincerely,



Brian Gaffney

## Rexing, Stephanie@Coastal

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**From:** mark@epstar.com  
**Sent:** Wednesday, July 29, 2020 12:53 PM  
**To:** Rexing, Stephanie@Coastal; Martinez, Erik@Coastal  
**Cc:** Donna Epstein; Sam Epstein  
**Subject:** Cypress Point project

**Expires:** Monday, January 25, 2021 12:00 AM

Hello, Stephanie and Erik. I have been a resident of Moss Beach since 1982 and I have seen the developments on the midcoast first hand. I also live on Carlos Street, less than 100 yards from the proposed Cypress Point project. I cannot believe that anyone thinks the proposed high-density project at the top of Carlos Street is consistent with the surrounding community.

I also cannot believe that San Mateo County is trying to ram this project through the permitting/oversight process in the face of substantial community opposition. Local politicians used to represent the residents; now they tell us what is good for us. Speaking for the community attitude, nobody here is adverse to affordable housing projects – we know that the County and State have a serious need. The problem is where such a project should be located. The Cypress Point site is materially deficient in addressing the realities of (1) insufficient water and sewer, (2) insufficient amenities for the residents such as public transportation, grocery shopping, schools, jobs, doctors, dentists, etc. and (3) especially the impact on traffic on Highway 1 and the neighborhood streets close to the project. All you have to do is drive south on Carlos Street from the project to encounter the blind curve on the narrow road which is absolutely inadequate now (before the addition of another 200 car trips twice a day), or try to enter Highway 1 going north on Carlos Street from the project where you will experience another blind curve hiding the speeding northbound traffic. On weekends the traffic on Highway 1 is a nightmare for the residents who effectively are deprived of access to the Highway.

I urge you to require an environmental impact report before allowing the development of this project.  
Respectfully,

Mark L. Epstein  
Epstein & Friedman LLP  
2025 Carlos Street  
Moss Beach, CA 94038

650-728-5040 Direct  
650-728-8318 Fax  
[mlepstein@msn.com](mailto:mlepstein@msn.com)  
[mark@epstar.com](mailto:mark@epstar.com)

**LAW OFFICES OF BRIAN GAFFNEY, A Professional Corporation**

446 Old County Road, Suite 100-310

Pacifica, California 94044

(650) 219 3187 Phone

[brian@gaffneylegal.com](mailto:brian@gaffneylegal.com)

July 21, 2020

*Via Email*

San Mateo County Board of Supervisors

[spurewal@smcgov.org](mailto:spurewal@smcgov.org)

RE: MidPen Housing proposed Cypress Point project  
PLN2018-00264

Dear Supervisors Canepa, Groom, Horsley, Pine and Slocum,

Resist Density has commented on this project before the San Mateo County Planning Commission including that:

1) San Mateo County must conduct environmental review of its discretionary zoning and PUD approvals prior to approval adoption;

2) The County has failed to follow its own Zoning Regulations in review of the proposed project;

3) Planning Department staff reports have not provided the public with fair, unbiased descriptions of project impacts on the Midcoast region;

4) Setbacks, lot coverage, and floor area have been based on plans not made available to the public;

5) The proposed project is inconsistent with the Coastal Act and the San Mateo County LCP.

Below, please find additional comments Resist Density would like the Board to consider in the context of the previously submitted comments:

**A. Discretionary Zoning Changes Require County CEQA Review  
Particularly For Impacts Outside Coastal Resources.**

The proposed zoning amendments and new Planned Unit Development (PUD) designation are discretionary County actions. These approvals are subject to CEQA's environmental review mandate. The evidence is clear. These approvals will result in direct and indirect significant environmental impacts. CEQA §§ 21080, 21065; *Union of Med. Marijuana Patients, Inc. v. City of San Diego* (2019) 7 Cal. 5th 1171, 1199.

The Monowitz 7/21/20 report conveniently omits from its Chronology or discussion that there was an EIR for a different project at this exact site. That project was described as "rezoning of the project site to a Planned Unit

Development” in addition to other approvals. 1985 Draft EIR at p. 1-1. To avoid environmental review now - until after the PUD zoning changes are adopted - conflicts with the County’s prior approach for the same site.

Further, consider what happens if the Coastal Commission (“CCC”) fails to certify the LCP Amendment as proposed by the County as it will not protect coastal resources. The LCP Amendment fails for the time being, unless subsequently modified by the County and certified by the CCC. But, in the meantime, while the County crafts their LCP Amendment modification, the County has already approved and put in place a new PUD and zoning for this APN – without the benefit of environmental review.

Under CEQA, “approval” means the decision which commits the agency to a definite course of action in regard to a project. CEQA requires the County to conduct environmental review before it commits to a “definite course of action” with respect to any project which might have a significant impact on the environment. *City of Santee v. Cty. of San Diego* (2010) 186 Cal. App. 4th 55, 59. So too, the California Supreme Court has held that CEQA must “not be interpreted as allowing an EIR to be delayed beyond the time when it can, as a practical matter, serve its intended function of informing and guiding decision makers.” *Save Tara v. City of W. Hollywood* (2008) 45 Cal. 4th 116, 130. Environmental review must not be so late that such review loses its power to influence “key public decisions” about projects. *Ibid.*

The County has not considered the non-Coastal Act resources affected by the County’s rezoning and PUD designation project grading, drainage, parking, new utilities, setbacks, floor area, and landscape irrigation. Such non-Coastal Act resources include but are not limited to traffic impacts to neighborhood streets, cumulative traffic impacts to the MidCoast region, emergency fire safety evacuation, and cumulative wastewater impacts to the MidCoast region.

Here, delaying environmental review - until after the key public decisions of rezoning and a new PUD are completed - deprives the Board *and the public* of information each needs about the direct and indirect environmental project impacts of these decisions.

## **B. The County’s Approval Process Violates the LCP**

Staff frames the County’s creation of a new site-specific PUD as simply an amendment to the LCP Implementation Program. It is not so limited as described above. Moreover, the LCP Implementation Plan doesn’t reference Planned Unit Developments. In fact, the San Mateo County LCP holds that affordable housing rezoning to the Planned Unit Development (PUD) zone is done “*in conjunction with development plan approval.*” LCP 3.15, subd. (c). Is this the development plan approval? The LCP Implementation Plan requires that except for the Section IV amendments, the County will continue to use Zoning Ordinance Division VI, Part

One to regulate development in the Coastal Zone. In contrast, the PUD will govern in any conflict with County Zoning Regulations.

**C. The Monowitz 7.21.20 Report**

Staff has not allowed the public adequate time to review its report. First, Zoning Regulation 6552 requires that the Planning Commission “shall” make a report of its findings, summaries of hearings, and recommendations with respect to the proposed amendment and shall file with the Board of Supervisors such report “within thirty (30) days from the final [Planning Commission] hearing thereon.” The Planning Commission hearing was June 10, 2020, so the Commission’s report should have been filed with the Board by Friday July 10. Complying with this regulation would have given the public eleven days to review the Commission’s report before today’s Board meeting.

Much of the 28-page single-spaced Monowitz report contains new explanations and rationales for how and why the County is proceeding with this project. Staff’s noncompliance with Zoning Regulation 6552 has hampered the public’s ability to adequately digest and comment thereon. Any claim later that the public has not adequately exhausted administrative remedies must take this into account.

Without environmental review, Staff asserts that there is no evidence to indicate that the proposed project will have adverse impacts on any known ESHAs in the project vicinity and no impact to sensitive habitats. Staff omits that it is reasonably likely that a sewage pump station will be needed for the project, and if improperly designed could result in spills of sewage to waters of the United States. *The 1985 EIR described the project site as within 50 feet of the ESHA Montara Creek.* At its closest point, the project site is located about 750 feet from the coastline of the Pacific Ocean.

The Stevens Consulting Cypress Point Project Public Services and Utilities Report at Section 7.4.1 reveals that the project site slopes range from 10 percent to 50 percent, that there is no existing storm drain infrastructure on the property, and that “*stormwater ultimately discharges to Montara Creek within the James V. Fitzgerald Area of Specific Biological Significance (ASBS) watershed area.*” In addition to stormwater from the 11-acre project site, there is an additional one (1) acre of offsite runoff that drains through the project site and contributes to the overall drainage area.

There is expert comment that “there is a potentially significant adverse wastewater impact that should be evaluated further before project approval.” There is also expert comment that “of particular concern to project impacts on wetlands and riparian habitat, the BRA makes only vague reference to drainage being “directed away from” the adjacent creek. This contrasts with BKF’s May 2, 2018 Cypress Point Hydromodification Management Memorandum and the Stevens



Consulting Cypress Point Project Public Services and Utilities Report which both state that *excess stormwater runoff surface flows ultimately discharge to Montara Creek*. The BRA should provide a more thorough description of the location, volume, and rate of drainage in order to adequately evaluate impacts to the adjacent Montara Creek and impacts to wetlands.

Staff argues that the changes before the Board are limited to “reduction in density.” It is on this basis alone that Staff argues compliance with the California Coastal Act. Staff ignores that impacts must be judged based on the baseline of the land in its current condition, not as compared to the adopted but never implemented plan.

Staff’s claims about Coastal Act compliance ignore the evidence and serious questions raised by peer review of MidPen’s flawed traffic and transportation, soil contamination, sewage wastewater, and biological studies. MidPen’s own traffic consultant concluded significant and unavoidable project traffic impacts. Staff’s use of a ratio approach to justify traffic impacts – the project will only “incrementally” exacerbate these LOS F delays a by small percentage – violates well established law.

#### **D. The New Design Review Overlay**

The Planning Department Staff Report for the June 10, 2020 Planning Commission hearing for the first time included a Planning Commission recommendation “adding the Design Review Zoning Overlay to the parcel designated PUD-140.” This Design Review Zoning Overlay is included in the proposed Board of Supervisors’ Resolution and Ordinance.

What the “Design Review Zoning Overlay” will be is never explained.

The “Design Review Zoning Overlay” has not been described in text or map. In the Coastal Development District, an “overlay district” is “a set of zoning requirements, described in the ordinance text and mapped, which is imposed in addition to the requirements of one or more underlying districts. Development in such districts must comply with the requirements of both the overlay district and the underlying district(s).” Zoning Regulation 6328.3, subd. (o). This zoning change thus violates the County’s Zoning Regulations and violates CEQA’s requirement for a definitive project description.

Further, a design review overlay is not included in San Mateo County’s LCP Implementation Program. The LCP Implementation Program adds or amends various zoning districts but not design review.<sup>1</sup> This provides further evidence that the proposed zoning changes before the Board are not limited simply to amendments to the LCP.

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<sup>1</sup> San Mateo County LCP section 8.12(a) provides for a Design Review (DR) Zoning District in urban areas of the Coastal Zone, but not in rural areas of the coastal zone.



**D. Bias**

It appears to Resist Density and the public that San Mateo County is unable to conduct a fair hearing into this matter. By contributing approximately \$5.5 Million in funding to date to the Cypress Point project, ignoring its own Zoning Regulations and precedent, failing to provide the public with adequate time to comment, and failing to discuss the serious expert comment before the agency, the County has demonstrated its bias in favor of MidPen's proposed project. The County's review of this project, without conducting proper environmental review, is tainted by its prior substantial funding of the project. The hearing appears to be simply a "rubber-stamp" for a decision which the County has already made.

Thank you for your careful consideration of these comments and others by the public.

Sincerely,



Brian Gaffney

cc: dpine@smcgov.org, cgroom@smcgov.org, dhorsley@smcgov.org,  
wslocum@smcgov.org, dcanepa@smcgov.org, smonowitz@smcgov.org,  
mschaller@smcgov.org

Enc. 1985 Farallon Vista EIR

**From:** [ted kaye](#)  
**To:** [Martinez, Erik@Coastal](mailto:Martinez_Erik@Coastal)  
**Subject:** Mid Peninsula's housing project for Moss Beach  
**Date:** Monday, June 15, 2020 8:32:32 AM

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Dear Mr. Martinez, virtual meetings do not allow adequate public participation in hearings regarding the pending housing project in Moss Beach. I do not want further decisions be made regarding Mid Peninsula's housing plan for Moss Beach until further public live meetings be conducted that provide for public comments. Ted Kaye, Moss Beach

Sent from my iPhone

**LAW OFFICES OF BRIAN GAFFNEY, A Professional Corporation**

446 Old County Road, Suite 100-310

Pacifica, California 94044

(650) 219 3187 Phone

[brian@gaффneylegal.com](mailto:brian@gaффneylegal.com)

June 8, 2020

*Via Email*

San Mateo County Planning Commission

[planning-commission@smcgov.org](mailto:planning-commission@smcgov.org)

[mschaller@smcgov.org](mailto:mschaller@smcgov.org)

RE: MidPen Housing proposed Cypress Point project  
PLN2018-00264

Dear Commissioners Hansson, Gupta, Santacruz, Ramirez and Ketcham,

This office represents Resist Density regarding the proposed Cypress Point project in Moss Beach. This office submitted comments to the Planning Commission regarding the proposed project on January 22, 2020. Below are additional comments upon our review of the June 3, 2020 San Mateo County Staff Report ("Staff Report") addressing the following:

1. The Staff Report does not respond to substantial expert comments regarding the project, its impacts and mitigations;
2. The Staff Report "piecemeals" the project to avoid environmental review at the earliest possible stage in the County's review;
3. The Staff Report improperly defers until after project approval the formulation of mitigation measures;
4. Setbacks, lot coverage, and floor area are based on plans not made available to the public;
5. The Staff Report uses an improper environmental baseline in regards to traffic safety and circulation impacts;
6. The project description continues to change and there has been no analysis of the potential environmental impacts of these changes.

Thank you for your careful consideration of these comments..

Sincerely,



Brian Gaffney

1. The Staff Report does not acknowledge or respond to the substantial comments submitted to the Planning Commission and the Planning Department on April 9, 2020 by Matt Hagemann / SWAPE regarding project hazards and hazardous materials impacts and regarding hydrology and water quality impacts. Nor does the Staff Report acknowledge or respond to the substantial comments submitted on May 7, 2020 by Pang Engineers, Inc. regarding traffic comments impacts and mitigations. Additional comments were submitted on June 8, 2020 by BioMaAs regarding biological impacts and by Robert W. Emerick regarding sewage impacts.

In addition, the Staff Report does not attempt to refute Resist Density's comments that the proposed project is inconsistent with the Coastal Act and the San Mateo County LCP.

2. The Staff Report reveals that San Mateo County will avoid analysis of the reasonable foreseeable impacts of the proposed project and intends to "piecemeal" the project to avoid environmental review at the earliest possible stage in the County's review.

Yet, the stated purpose of the LCP Amendment is "in preparation for the future submittal of a coastal development permit application." P.2. "[A]pprovals that require CCC approval will be processed first, and the County-specific approvals including the General Plan amendment and site specific approvals will be processed thereafter. The accompanying change to the General Plan Land Use Designation will be resubmitted for Planning Commission consideration, along with an environmental document that addresses CEQA requirements, if the proposed LCP Amendments are certified by the CCC." P. 3. This ignores that the Cypress Point Project Executive Summary (April 2019) already described the requested approvals as including amending the San Mateo County's General Plan. Likewise, the January 22, 2020 Staff Report described the issue before the Planning Commission as including "Consideration of a General Plan Land Use Map Amendment." And, the approval before the Planning Commission is a proposed discretionary action to add PUD-140.

In so doing, the Staff Report fails to address Commissioner Ketcham's concern that specific findings on the precise plan would normally be informed by full CEQA review. P. 7. Nor does Staff contend that there is adequate analysis of impacts, only that "Staff believes there is sufficient detail within the submitted plans to do this analysis" later after approval of the LCP Amendment and PUD designation for the site. P. 7.

Nor does the Staff Report respond to Commissioner Ketcham request for examples of other use of this "reverse 2-step approval process." P. 8. Tellingly, Staff asserts the Applicant's cost (ie invest) is more important to Staff than either plan specificity or analysis of impacts prior to project approval. Staff does not provide any reference to the Coastal Act, the LCP, or other law to support its assertion that the "reverse 2-step process" is appropriate. P. 8.

Likewise, the Staff Report does not address Commissioner Ketcham's comment about the need for analysis of the impacts of 692 haul truck trips. Instead, Staff impermissibly defers analysis to the "development review process." p. 12. Because these trips are a reasonable foreseeable result of the LCP and amendment and PUD-140 creation, environmental review must be conducted before project approval.

The Staff also does not agree to require additional soil sampling, as recommended in the Phase 2 report and requested by Commissioner Ketcham, to assess the horizontal extent of lead-impacted surface soils." P. 13. Instead Staff improperly defers analysis of both likely hazardous and asbestos impacts and mitigations until the "development review process (Phase 2 of this project)."<sup>1</sup>

3. The Staff Report improperly defers until after project approval the formulation of mitigation measures with specific performance criteria in regards to traffic circulation mitigation measures (pp. 4 & 5), does not explain undefined "contributions" to the installation of an intersection control within the Highway One Moss Beach corridor<sup>2</sup> (p. 5), fails to analyze the feasibility of roundabouts as potential traffic mitigations (p. 5), assumes without analysis that hazards mitigation will "eliminate any health risks" (p. 9), and defers mitigations for construction fill and traffic. P. 12.

In regards to the "Preliminary Circulation Improvement Plan," (pp. 37 – 39) there is no analysis of the potential adverse impacts of each component of this proposed plan, there is no analysis of whether and to what extent pedestrian and bicycle access plans will reduce potentially significant traffic impacts, there is no definition of what constitutes "Fair share contribution" for accessible bus stops or "Fair share contribution" to intersection control at Highway 1, there is no explanation of what "if feasible" means in the context of "Fair share contribution," there is no performance standards for the deferred maintenance of "suite of transportation demand management strategies," and the Plan says not that MidPen will be required to implement or pay for subsidies - only that MidPen will "consider" them. Thus, the traffic mitigations are vague and unenforceable.

4. Regarding Setbacks, the Staff Report claims that "the applicant has revised the site plan so that no buildings will be closer than 20-feet from the Carlos Street right-of-way." The Ordinance, however, does not support this assertion. The proposed PUD-140 (Ordinance Section F) instead states only that "The minimum setbacks of the proposed buildings shall conform to those shown on the plans reviewed by the Planning Commission on June 10, 2020, or as modified by Coastal Development Permit conditions of approval." There is no reference to a 20-foot setback. Moreover, those plans have not been made available to the public, thus thwarting public review.

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<sup>1</sup> There is a reasonable argument that, by contributing \$4.5 Million in funding to Cypress Point, San Mateo County has already approved the proposed project prior to conducting proper environmental review.

<sup>2</sup> Does one dollar constitute an adequate contribution, and why ?

Further, those setbacks may be changed in applicant-driven CDP conditions of approval.

Nor is the public able to adequately comment on either the lot coverage or the permissible floor areas - as these too are based on plans not made available to the public.

5. The Staff Report continues to use an improper baseline in regards to traffic safety and circulation impacts by comparing the proposed project to PUD-124. P. 4.

6. The project continues to change. Thus the project description is not stable.

For the first time, the project will include “removal of dead trees and other highly flammable vegetation.” (P. 5.) In contrast, MidPen’s Biological Resource Assessment (May 2018) stated that “The dense cypress habitat along the northern property boundary is not proposed for removal/disturbance.” Despite this change in the project, there is no analysis of the biological impacts of this tree/vegetation removal.

Similarly, the project will now include more than 142 parking spaces. A minimum of 142 parking spaces is envisioned with the possibility of more if the “applicant wished to create more parking spaces.” Not only is this a change in the project, but there has been no analysis of the impacts on traffic.



June 8, 2020

San Mateo County Planning Commission  
[planning-commission@smcgov.org](mailto:planning-commission@smcgov.org)  
[mschaller@smcgov.org](mailto:mschaller@smcgov.org)

**RE: MidPen Housing Cypress Point Housing Project, Moss Beach CA  
Wastewater Impact Analysis**

Dear Commissioners Hansson, Gupta, Santacruz, Ramirez and Ketcham,

I write regarding the Wastewater Impact Analysis for the proposed MidPen Cypress Point project.

I am a registered Civil Engineer (State of California License No. 58914) experienced in wastewater treatment and disposal. I received my Ph.D. in Civil and Environmental Engineering from the University of California at Davis in 1999 where I majored in wastewater treatment with doctoral minors in ecology and stochastic modeling. I have taught wastewater treatment process design courses for the State Water Resources Control Board and owned a 150-person engineering firm specializing in municipal infrastructure permitting, planning, design, and operation (ECO:LOGIC Engineering, Roseville, CA) prior to its sale to Stantec in 2011. My CV is attached.

To prepare these comments I reviewed the following documents:

- Cypress Point Project MidPen Housing, Public Services and Utilities (Stevens Consulting, July 2018)
- Cypress Point Project Cumulative Impacts Analysis (2<sup>nd</sup> County Review Draft, April 2019)
- Cypress Point Project Preliminary Environmental Evaluation Report (2<sup>nd</sup> County Review Draft, April 2019)
- Carollo Engineers (1999) Sewer Authority Mid-Coastside Wet Weather Flow Management Program Facility Plan Report DRAFT
- Sewer Authority Mid-Coastside Infrastructure Plan: FY17/18 –FY21/22
- Sewer Authority Mid Coastside (April, 2018) DRAFT 20-Year Capital Improvement Plan
- Consent Judgment, *Ecological Rights Foundation v. Sewer Authority Mid-Coastside*, Northern District of California Case No. 3:18-CV-04413
- San Mateo County Local Coastal Plan, Table 2.3, 2.4 & 2.7, Estimate Of Midcoast Sewage Generation

Based on my review of the above documents and my background and experience, I offer my professional opinion on the following three issues: (1) the current condition of the wastewater conveyance system to transport sewage generated by MidPen's project to the Sewer Authority Mid-Coastside (SAM) wastewater treatment facility and the history of sewage spills, (2) the potential adverse impacts from construction of the new sewage collection system



for the proposed MidPen development, and (3) the completeness of MidPen's assessment of project-specific and cumulative wastewater impacts.

### **Existing Conveyance System & History of Sewage Spills**

As background, I understand that the SAM operates an Intertie Pipeline System (IPS) for conveying wastewater from its member agencies to the SAM wastewater treatment plant. The IPS consists of pump stations, force mains (i.e., pipelines operating under pressure), and gravity flow pipelines. The totality of these systems must operate in a manner that does not allow sewage to overflow into homes, onto streets, or into waters of the United States. Any sewage that overflows the sewerage collection and conveyance system is unlawful and is called a sanitary sewer overflow (SSO).

The proposed MidPen development is located within the Montara Water & Sanitary District (MWSD), which is located at the furthest end of the IPS from the SAM wastewater treatment plant. All of the Montara sewage is pumped through the IPS by SAM's northern pump station, the Montara Pump Station, to the sewage treatment plant located in Half Moon Bay (MWSD 2018). Wastewater generated by the proposed MidPen project must necessarily be conveyed by the IPS through segments also serving Montara, Princeton by the Sea, El Granada, and the City of Half Moon Bay. SAM's Intertie Pipeline System has had at least 65 separate discharges of inadequately treated or raw sewage since 2013 alone. Over 557,103 gallons of sewage have been illegally released, the vast majority of it released into the Pacific Ocean and Half Moon Bay. In addition, SAM's operation of the wastewater sewage collection systems has resulted in tens of thousands of gallons of raw or inadequately treated sewage being released onto streets in residential neighborhoods. Sewage contains human waste, viruses, protozoa, mold spores, bacteria, and chemical contaminants. Many of the pollutants found in raw and/or inadequately treated sewage are acutely toxic.

The inadequacy of the wastewater sewage collection system and the serious ecological problems resulting therefrom have been known to SAM for decades. As far back as 1999 SAM's consultants recognized that the IPS had not been maintained in a manner to prevent regular occurrences of SSOs.<sup>1</sup> During wet weather, the IPS receives its highest flows owing to Inflow and Infiltration (I/I) (i.e., surface runoff and water from saturated soil that enters the IPS through system defects such as cracked pipes, separated pipe joints, and illegal cross connections to roof and yard drains).

About 18 years after the need for improvements was first identified by Carollo Engineers, SAM prepared an Infrastructure Plan to work toward eliminating SSOs.<sup>2</sup> That plan has not been followed in its entirety. I understand that litigation regarding the SAM system ultimately resulted in a Consent Decree being issued in 2019.<sup>3</sup> Pertinent elements of the

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<sup>1</sup> Carollo Engineers (1999) Sewer Authority Mid-Coastside Wet Weather Flow Management Program Facility Plan Report DRAFT

<sup>2</sup> Sewer Authority Mid-Coastside Infrastructure Plan: FY17/18 –FY21/22

<sup>3</sup> *Ecological Rights Foundation v. Sewer Authority Mid-Coastside*, Case No. 3:18-CV-04413



Consent Decree include completing the replacement of Granada Force Main Segment 4 by June 30, 2020, implementing the feasible recommendations of a Princeton Force Main condition assessment and pump station feasibility study by June 30, 2024, and completing replacement of the Montara Force Main by June 30, 2024 to prevent SSOs. Therefore, the system used to accommodate the proposed MidPen Cypress Point wastewater will not be able to guarantee compliance with Regional Water Quality Control Board regulatory requirements associated with SSOs until June 30, 2024 at the earliest.

Additionally, a draft Capitol Improvement Plan was issued as recently as April 2018 describing maintenance and upgrades needed through 2038.<sup>4</sup> The Capitol Improvement Plan describes Category 1 improvements (i.e., items requiring attention to address full regulatory compliance) and Category 2 improvements (i.e., maintenance items for existing infrastructure to assure compliant operation). Not all of these designated Category 1 and Category 2 improvements have been completed per the plan.

Given the above, an adequate analysis of MidPen's wastewater impacts must include evaluation of potential project impacts in light of this history of sewage spills, the SAM Infrastructure Plan, the Force Main segment replacements and Pump Station noted above, as well as the status of each program element described within the Capitol Improvement Plan.

That analysis has not been completed or released to the public to date, and thus there is an insufficient basis to assess whether there is adequate capacity to serve existing commitments with the addition of the proposed MidPen development, or cumulative development.

### **New Conveyance System & Potential for Adverse Impacts**

The Cypress Point Project Public Services and Utilities Analysis (Stevens Consulting, July 2018) conclusion - that there will be a less than significant sewer services impact<sup>5</sup> - suffers from a number of inadequacies and omissions. First, "no utility plans have been completed for the proposed project." Therefore, what actually is proposed is not adequately described. Steven's Consulting does reveal that there is no existing sanitary sewer infrastructure on the project site, and new sewer pipelines will be needed to connect the project site with the existing MWSD sewer lines in adjacent roadways. Further, while MidPen vaguely acknowledges that "MWSD transmission facilities" may need to be upgraded in the vicinity of the project site," specific sanitary sewer infrastructure plans should be provided for review prior to making a determination that the project has a less than significant wastewater impact.

Second, it is reasonably likely that a pump station will be needed for the project and if improperly designed could result in spills of sewage to waters of the United States. At its closest point, the project site is located about 750 feet from the coastline of the Pacific Ocean. Elevations of the project site range from 77 feet at the northwest corner to 189 feet along the

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<sup>4</sup> Sewer Authority Mid Coastside (April, 2018) DRAFT 20-Year Capitol Improvement Plan

<sup>5</sup> Cypress Point Project MidPen Housing (July, 2018) Public Services and Utilities



easterly boundary. A perennial stream (Montara Creek) is located approximately 50 to 250 feet to the northwest of the project site and runs parallel to the northern border prior to reaching the Pacific Ocean. There is a 100 foot elevation change moving away from the Pacific Ocean and a stream at the northern boundary. Given this geography and in the absence of utility plans, it is reasonably likely that a new pump station will be required to adequately remove wastewater from the MidPen project site to a neighboring sewerage conveyance system. Pump stations have the potential to overflow into waters of the United States if not adequately designed and maintained. Thus, there is a potentially significant adverse wastewater impact that should be evaluated further before project approval.

### **Assessment of Treatment Facility Capacity and Pollutant Loads**

Stevens Consulting Wastewater Analysis (July 2018) claims that the SAM wastewater treatment system and IPS has adequate capacity for growth anticipated in the region - based entirely on "[c]onsidering dry weather flows." It appears that MidPen has not evaluated capacity with wet weather flows. Average Dry Weather Flow (ADWF) is a regularly used term with regards to regulating wastewater treatment facilities, but it has essentially no basis in assessing adequate design and operation of wastewater treatment facilities.<sup>6</sup> Important wastewater treatment facility design parameters must account for both wet weather flows and peak pollutant loads. It appears that MidPen has not evaluated either peak wet weather flows or pollutant loads.

The most critical flow parameter in assessing adequate capacity is instantaneous peak flow, because that parameter determines whether there will be spills or overflows within the conveyance or treatment facilities, as well as adequate disinfection. As described above, the sewage collection system is currently unable to fully handle peak I/I flows without occasional SSOs.

Loads constitute the pollutants present in wastewater and are the basis of regulating the discharge. Although there has been discussion regarding a decrease in flows owing to water conservation, MidPen has not evaluated potentially significant impacts related to pollutant loads.

It is misleading to suggest in the planning documents that because water conservation has reduced flows to the wastewater treatment facility that there necessarily remains adequate treatment capacity. Water is simply a carrier for the pollutant loads. It is instructive to note that if the amount of water discharged by residences is halved owing to water conservation, it does not free up capacity that can be used by others. Rather, the concentration of pollutants in the water will instead double (i.e., the mass of pollutants remains constant when diluted in half the amount of water). In some instances treatment processes must be modified to adapt to

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<sup>6</sup> Current treatment plant loading should instead be compared to wastewater treatment plant design criteria in lieu of the average dry weather flow presentations currently used to assess capacity.



the concurrent higher pollutant concentrations combined with lower flows. In no case is treatment capacity ever increased by reducing water volume alone.

Pollutant loads should be considered when determining whether there is adequate treatment capacity to accommodate current obligations. Two issues are entirely missing from the MidPen's analysis of wastewater impacts: (1) impacts associated with constructing accessory dwelling units (ADUs) throughout the District and (2) sludge processing and disposal needs associated with the treatment facility.

### **Accessory Dwelling Units**

Stevens Consulting reports that even without construction of the proposed MidPen project, there are already 22,000 coastal residents discharging to the wastewater treatment plant. The San Mateo Local Coastal Plan describes the need to account for 466 second units and 45 caretaker's quarters at the residential buildout served by the sewers.<sup>7</sup> In addition, the California Legislature recently approved an increase in pollutant loads to the wastewater treatment plant from existing developed sites (e.g., Assembly Bills 68, 881 and Senate Bill 13). The legislation allows for increasing the number of habitable dwellings discharging into existing wastewater treatment plants.

MidPen's wastewater analysis fails to evaluate the impact on wastewater treatment facility capacity of the proposed MidPen project in combination with the second units contemplated in the LCP and the impact of adding these additional ADUs.

Also, MidPen does not consider whether the expanded sewage line and potential pump station for the project will increase the development intensity or off-site development by facilitating such second units or ADUs in the project vicinity.

### **Analysis of Cumulative Wastewater Impacts**

The Cypress Point Cumulative Impacts Analysis (April, 2019) concludes that the Cypress Point project would make a less than cumulatively considerable contribution - based on its assumptions that "the proposed project would not require or result in the construction of new wastewater treatment facilities, or the expansion of existing treatment facilities" and that "SAM has sufficient capacity." However, as discussed above these cumulative impact conclusions are suspect given that MWSD transmission facilities may need to be upgraded in the vicinity of the project site, specific sanitary sewer infrastructure plans has not been provided, an improperly designed pump station could result in spills of sewage to waters of the United States, and to date MidPen has not evaluated either peak wet weather flows or pollutant loads from the proposed project.

The Cypress Point Cumulative Impacts Analysis (April, 2019) at Table 3 describes reasonably foreseeable residential projects. The report predicts 19 accessory dwelling units

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<sup>7</sup> San Mateo County Local Coastal Plan, Table 2.3 Estimate Of Midcoast Sewage Generation



within El Granada (10 units), Half Moon Bay (1 unit), Montara (5 units), and Moss Beach (3 units) with no units forecast for Miramar, Pacifica, and Princeton. The projection of only 19 accessory dwelling units in a system accommodating at least 22,000 coastal residents appears low and is unsubstantiated. Insofar as (1) housing is already generally scarce throughout California and the scarcity was the basis for passing the legislation, (2) the legislation results in reduced impact fees associated with constructing on already developed lots, and (3) the cost of constructing ADUs is expected to be far less than constructing residences on new lots owing to the presence of existing infrastructure, it does not appear reasonable to suggest that only 19 ADUs will be constructed within District limits. An adequate cumulative impact analysis would consider the ultimate potential for ADUs following the recently enacted legislation within existing lots and develop pollutant loading criteria accordingly when assessing how much treatment capacity remains at the wastewater treatment plant.

Sludge Production.

As stated above, MidPen's Public Services and Utilities (Stevens Consulting, July 2018) does not address pollutant loads. As stated above, pollutant loads ultimately become sludge that requires its own treatment and disposal. It is appropriate to include analysis pertaining to sludge treatment capacity and long-term sludge disposal capacity when assessing the ability of the wastewater treatment plant to treat to meet existing commitments, including those the proposed MidPen project as well as associated with likely ADUs.

Thank you for considering these project comments.

Sincerely,



Robert W. Emerick Ph.D., P.E.



# Robert W. Emerick Ph.D., P.E.

1013 K Street – Lower Level  
Sacramento, CA 95814  
(916)826-6990

Dr. Emerick was a principal owner of ECO:LOGIC Engineering, a 150+ person engineering firm specializing in design, permitting, operation, and management of water/wastewater infrastructure. The firm was sold to Stantec, Inc. in 2011, with Dr. Emerick leaving the firm in 2015 to aid in the redevelopment of downtown Sacramento and to work as a private engineering consultant. Dr. Emerick has 25 years of civil engineering/water quality experience, including teaching at the undergraduate and graduate level, research, engineering management, regulatory permitting, environmental studies, regulatory enforcement, and water/wastewater treatment process development, design and operation. He is an acknowledged leading expert in obtaining waste discharge permits for private and public agencies and developing treatment processes for the removal of trace contaminants from wastewater discharges.

## EDUCATION

B.S., Civil Engineering, University of California, Davis, California, 1992

M.S., Civil and Environmental Engineering, University of California, Davis, California, 1993

Ph.D., Civil and Environmental Engineering, University of California, Davis, California, 1998

University of California at Davis, California State University Sacramento

*Teaching Assistant and Adjunct Professor. Courses were aimed at (1) retraining nuclear engineers after the closure of Mare Island Naval Shipyard for civilian practice, and (2) undergraduate and graduate civil engineering education. Taught wastewater treatment design for UC Davis to aid in their accreditation process. Served on the review panel for UC Davis civil engineering accreditation.*

## REGISTRATIONS

Professional Engineer #58914, State of California

## Redevelopment

Sacramento, CA

*Owner and Engineer. Restored and recently completed redevelopment/construction of 35,000 square feet of historic commercial property for contemporary uses. Started businesses as part of the redevelopment effort, including Crest Theatre (950 seat venue for concerts, movies, community events), Empress Tavern (7500 square foot fine dining restaurant), and Mother (1500 square foot casual vegetarian restaurant).*

## PROJECT EXPERIENCE

### Teaching

State Water Resources Control Board

*Instructor (via role as Adjunct Professor at UC Davis). Responsible for wastewater process design, operation, and troubleshooting course development and presentation. This project involves a series of classes presented to all State of California regulators, fund reviewers, policy makers, and facility inspectors. Courses are intermittently on-going and include (1) Disposal of Non-Designated Waste to Land, (2) Wastewater Facility Inspection and Monitoring, (3) Introduction to Wastewater and Its Treatment, and (4) Wastewater Engineering 2 "The Advanced Class." Courses have been video recorded for archival at the State Water Resources Control Board. Courses have been translated into Spanish and have been presented to operators in Mexico.*

### Permitting, Compliance, Auditing

Facility Improvements, Ione, California

*Project Manager for developing facility improvements needed for compliance with Reclamation permit limitations associated with Castle Oaks Golf Course (Ione, CA).*

\* denotes projects completed with other firms



**Lincoln, Rio Vista, Merced, Dixon, Donner Summit, Reno**

*Project Manager/Engineer responsible for negotiating permits for (1) land discharge of secondary effluent for Lincoln, CA (2) land discharge of secondary effluent for Dixon, CA, (3) master reclamation permit for Lincoln, CA., (4) surface water discharge of secondary and tertiary effluent for Lincoln, CA, (5) surface water discharge of secondary and tertiary effluent for Rio Vista, CA., (6) surface water discharge of secondary and tertiary effluent for City of Merced, CA., (7) surface water discharge for Donner Summit Public Utility District, (8) aquifer storage and recovery project for Reno, NV.*

**North Lake Tahoe Public Utilities District Potable**

*Project Manager/Engineer responsible for negotiating a the nation's first permit and designing improvements to produce potable water on an unfiltered drinking water supply using UV disinfection technology for North Lake Tahoe Public Utilities District.*

**Research**

**City of Reno, NV**

*Developing a membrane/ozone/biologically active activated carbon treatment process for the removal of trace emerging contaminants of concern for a groundwater aquifer storage and recovery project.*

**City of Dixon, CA**

*Responsible for analyzing groundwater and effluent quality for determining the presence of and/or extent of groundwater degradation. Project involves the application of tracers for determining origin and fate of wastewater contaminants.*

**Lincoln, CA and Rio Vista, CA**

*Investigating the partitioning of priority pollutant contaminants and wastewater treatment process impacts on the removal/reduction of priority pollutants for Lincoln, CA and Rio Vista, CA. Developed methodology for determining the correct hardness when applying CTR metals criteria.*

**Caltrans**

*Investigating/developing new treatment processes for removing iron, nitrogen, phosphorous, and turbidity from stormwater for Caltrans to aid in compliance with discharge restrictions into Lake Tahoe. Project involved development, construction, and operation of pilot treatment facilities treating highway runoff in the Lake Tahoe basin.*

**Sacramento Regional Wastewater Treatment Plant Coliform Bacteria Study**

*Investigated the physical parameters influencing the development of coliform bacteria associated with wastewater particles. Research involved developing an oligonucleotide probe specific to the family Enterobacteriaceae for visual identification of coliform bacteria within wastewater particles.*

**Sacramento Regional Wastewater Treatment Plant UV Disinfection Performance**

*Investigated the impact of particle size distribution impacts on UV disinfection performance for Sacramento Regional Wastewater Treatment Plant. Research involved developing a new computer aided photographic method of determining the particle size distribution of wastewater.*

**Sacramento Regional Wastewater Treatment Plant Tertiary Process Development**

*Aided in the development of a pilot facility to investigate removal of trace contaminants from the discharge into the Sacramento River. Provided professional peer-review of study results.*

**UV Equipment Validation Testing**

*Designed and operated a pilot testing facility for approval of UV disinfection system by the State of California Department of Health for use on recycled effluents. UV disinfection systems tested include (1) the Trojan Technologies Swift 4L12 UV disinfection system, (2) the Trojan Technologies UV 3000+ UV disinfection system (3) Trojan Technologies UV 2000 disinfection system, (4) Fisher Porter UV disinfection systems, (5) WEDECO TAK55 spot check validation for City of Lincoln, CA, (6) Trojan Technologies UV 3000+ spot check validation for City of Yucaipa, CA., (7) ENAQUA low pressure high output UV disinfection system.*

**Title 22 Filtration Validation Testing**

*Designed and operated a pilot testing facility testing for approval of filtration systems by the State of California Department of Health for use on recycled effluents. Filtration systems tested include (1) Nordic Water Products Disc Filter, (2) Parkson Disc Filter, and (3) AMIAD Screen Filter.*

\* denotes projects completed with other firms



**Biological Virus Removal Within Intermittently Dosed Fixed Growth Filters**

*Academic project involved development of a biological virus degradation process for the production of unrestricted recycled water for on-site reuse (UC Davis).*

**Water Environment Research Foundation (Project 96-CTS-3) Impact of Upstream Wastewater Treatment Process Type on Downstream UV Disinfection Performance**

*Project involved determining wastewater treatment process impacts and developing a fundamental stochastic model describing the ability of UV disinfection to inactivate pathogens.*

**Water Environment Research Foundation (Project No. 91-WWD-1) Comparison of UV Irradiation to Chlorination for Achieving Optimal UV Performance**  
*Project involved developing an empirical mathematical model for predicting UV disinfection performance.*

**Stormwater Management**

**State of California Department of Transportation (Caltrans) Stormwater BMP Pilot Program (Peer Reviewer)**

*This study was directed at reviewing, critiquing, and developing solutions associated with the BMP pilot research program.*

**San Francisco-Oakland Bay Bridge Storm Water Detention Basin Treatment Best Management Practice (BMP) Feasibility Study (Project Manager/Engineer)**

*This study, for Caltrans, was directed at determining and comparing the environmental benefits derived from implementing stormwater treatment for the bridge expansion in relation to the costs related to stormwater treatment.*

**Caltrans Maximum Extent Practicable Analysis for Storm Water Detention Basins Associated with Highway Runoff (Project Manager and Project Engineer)**

*This study was directed at determining and comparing the environmental benefits associated with implementing stormwater detention basins statewide as part of all new and retrofit roadway expansions/improvements.*

**Lake Tahoe Basin New Stormwater Treatment Processes (Project Engineer)**

*The development of new stormwater treatment processes for implementation within the Lake Tahoe Basin. This pilot study investigates treatment trains to remove nutrients, iron, turbidity, and narrative toxicity for compliance with the nation's most stringent effluent limits associated with stormwater runoff.*

**Sacramento County Stormwater BMP Review Program (Project Manager)**

*This project was directed toward developing approval criteria for the selection of stormwater Best Management Practices (BMPs) for installation within Sacramento County.*

**Wastewater Treatment**

**State of Nevada Department of Environmental Protection**

*Responsible for summarizing reclamation policy and groundwater recharge policy nationwide and developing a unified reclamation policy for the State of Nevada that integrates the findings of ozonation/biological activated carbon adsorption research conducted concurrently for the City of Reno.*

**Donner Summit Public Utility District, CA**

*Responsible for permitting and process development for nutrient removal treatment process upgrades, mixing zones, and associated regulatory permitting.*

**City of Reno, NV**

*Responsible for treatment process development for removing emerging contaminants of concern to non-detectable levels as part of a groundwater aquifer storage and recovery project.*

**City of Davis, CA (Process Design Manager)**

*In charge of developing treatment and disposal options for compliance with effluent dominated stream regulatory requirements.*



**City of Lincoln, Midwestern Placer Regional Sewer Project Environmental Impact Report (EIR), Lincoln, California (Process Design Manager)**

*In charge of process development for a tertiary (Title 22 unrestricted reuse) wastewater treatment and reclamation facility for the City of Lincoln. This treatment facility is the first in Northern California to be designed specifically to comply with California Toxics Rule Regulatory requirements (toxic contaminant limitations) and receiving water limits related to effluent dominated streams. The treatment process consists of a headworks, nitrification/ denitrification, clarification, priority pollutant maturation ponds, dissolved air flotation algae removal, coagulation/flocculation, granular medium filtration, UV disinfection, and effluent reeration.*

**City of Ceres Wastewater Treatment Plant Expansion, Ceres, California (Project Engineer)**

*The design of a tertiary (Title 22 unrestricted reuse) wastewater treatment plant. This facility consisted of headworks, nitrifying oxidation ditches, clarification, coagulation/flocculation, granular medium filtration, and UV disinfection.*

**Salt Accumulation Analysis, City of Ceres, California (Project Manager/Engineer)**

*A salt accumulation analysis related to land discharge of effluent for Ceres, CA. This analysis consisted of developing a groundwater hydraulic model for determining long-term salt impacts to groundwater related to a proposed groundwater replenishment project.*

**Priority Pollutant Characterization (Project Engineer)**

*Responsible for priority pollutant characterization for (1) Brentwood, CA (2) Mountain House, CA (3) Lincoln, CA (4) Rio Vista, CA, and (5) La Contenta Golf Course.*

**UV Disinfection Feasibility Study (Project Engineer)**

*Responsible for determining the feasibility of applying UV disinfection to (1) Manteca, CA (2) Sacramento Regional Wastewater Treatment Plant, CA, (3) Woodland, CA, (4) Rio Vista, CA, and (5) Auburn, CA.*

**Water Treatment**

**North Lake Tahoe Public Utility District UV Disinfection System**

*Process Design Manager/Engineer for a UV disinfection system on an unfiltered water supply for the North Lake Tahoe Public Utility District, CA. This UV disinfection system is the first in California to be permitted for the production of potable water, and the first nationally to be permitted for use on an unfiltered drinking water supply.*

**Groundwater Desalinization Project, Sparks, Nevada**

*Project Engineer responsible for analyzing the feasibility of groundwater desalinization.*

**UV Disinfection System for Third World Environments**

*Project Manager/Engineer for product review of a new UV disinfection system for application in Third World environments for the inactivation of Cryptosporidium and Giardia (Core Resources; Water Health UV Disinfection System).*

**Pulsed Light UV Disinfection System**

*Project Manager/Engineer for product review of a new pulsed light UV disinfection system for application on drinking water treatment (New Star Lasers).*

**Steiger Hills, CA Master Water Plan**

*Project Engineer responsible for master-planning a water supply and distribution system for Steiger Hills, CA.*



## PUBLICATIONS

- Contributing author to Potable Reuse Research Compilation: Synthesis of Findings, Water Environment and Research Foundation, 2016.
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June 7, 2020

San Mateo County Planning Commission

[planning-commission@smcgov.org](mailto:planning-commission@smcgov.org)

[mschaller@smcgov.org](mailto:mschaller@smcgov.org)

RE: Vegetation Assessment of MidPen Housing Cypress Point Project Site  
and California red-legged frog site adjacent to Montara Creek

Dear Commissioners and Mr. Schaller,

I write regarding the proposed Cypress Point project in Moss Beach.

I'm a professional forager, naturalist, and a plant and mushroom identification expert. I live in Montara, so I'm especially familiar with the plant communities of this area. I hike frequently, and identify plants on these walks. In 2015, I devoted myself to brokering and promoting wild foods full-time. I operate Morchella Wild Foods of California.

California's coastal fog belt is the most biodiverse part of our state, a narrow band of habitat that occurs only where summer fog brings moisture to the flora during otherwise dry months. The year-round moisture and mild temperatures result in thick vegetation, rich soil and a deep seed bank. Coastal forests here are comprised of Monterey pine and Monterey cypress, trees native to California and designated vulnerable/endangered by IUCN and the California Native Plant Society due to their small native ranges and susceptibility to disease and climate shifts. These forests are host to many native plant and mushroom communities.

The purpose of this letter is a concern I have with the planned development at Cypress Point. I attended the Planning Commission hearing in Half Moon Bay on January 22, 2020, where I was disappointed to hear the flora on the Cypress Point site described as "invasive grasslands," when it is in fact native forest. After the hearing I read MidPen's May 24, 2018 "Biological Resources Assessment," section Vegetation and found that this Assessment only discussed a fraction of the native vegetation I've observed on the project site and surrounding area. Even some of the most prominent plants were omitted from the list of species recorded during MidPen's survey in March 2017.

Some of the resources and reference guides I used in preparing this correspondence include:

Calflora database (<https://www.calflora.org/>)

iNaturalist database (<https://www.inaturalist.org/>)

*Tending the Wild* by Kat Anderson

*California Foraging* by Judith Lowry

*California Native Plants for the Garden*, by Carol Bornstein, David Fross, and Bart

O'Brien

*Mushrooms of the Redwood Coast* by Noah Siegel and Christian Schwarz

*Mushrooms Demystified* by David Arora

Attached is a map of the project site and surrounding area with points of interest labeled 1-11 where I've observed native flora, and below I identify the plants I've observed in each specific area

- 1) A native plant community of coyote brush, beach and wood strawberry, yerba buena, yarrow, California mugwort, little western bittercress, oso berry, California bee plant, California everlasting, and coast angelica.
- 2) Mugwort, yerba buena, California bee plant, poison oak and coyote brush along northern edge of site.
- 3) Abundant mycorrhizal mushrooms occurring with Monterey pine here: *Amanita muscaria*, *Lactarius deliciosus*, *suillus* spp., *boletus edulis*, *russula queletii*, and others.
- 4) Pacific aster, California coffeeberry, and Pacific sanicle are found throughout the site including here.
- 5) Beach sagewort.
- 6) Monterey cypress here host many native mushrooms including *Agaricus bernardii*, *Agaricus brunneofibrillosus*, *Clitocybe nuda*, and others.
- 7) Yarrow is found throughout the site, and in abundance here.
- 8) Coffeeberry, coyote brush, beach strawberry, Douglas iris, and checkerbloom can be found in the median between Carlos and Cabrillo Highway. In the Calflora database, there is an observation of rose leptosiphon, California Rare Plant (Rank 1B.1) being found at this location. A small and solitary plant, it would be difficult to find except when in bloom during a short period in May and June.
- 9) Pink honeysuckle and salt-loving agaricus mushrooms.
- 10) Watercress presence in Montara Creek is evidence of aquatic habitat which likely hosts red-legged frogs.
- 11) Single leaf onion, red flowering currant, red elderberry, arroyo willow and more can be found nearby in Montara Creek.

Of the many native plants omitted from MidPen's Biological Assessment, the most puzzling to me are the omission of California coffeeberry, yarrow, Pacific aster, Pacific sanicle, and California bee plant - because they are some of the most prominent vegetation throughout the site.

In addition, please consider that on April 12, 2020 I observed what I believe was a California red-legged frog adjacent to Montara Creek. The frog was on 14<sup>th</sup> Street, at the edge of the road, in a perennially wet spot created by a neighbor's groundwater drainage. I observed the frog about 100 yards north of Montara Creek. I understand that at this time of year this species roams from their aquatic breeding spots to upland areas during rainy periods like we had in early April this year. I have attached an image of the frog I observed. Although I am not an expert in herpetology, I understand that the prominent dorsolateral folds on the frog I observed are a key feature that distinguish California red-legged frogs from more common Pacific tree frogs. California red-legged frogs are our state amphibian, and designated a vulnerable species by IUCN due to habitat loss.

In conclusion, MidPen's Vegetation Assessment is clearly incomplete and understates the native flora that would be impacted by development here.

I urge you to postpone further consideration of this proposed project - until more a reliable biological assessment has been performed.

Sincerely,

Bryan Jessop











# BioMaAS

1278 Indiana Street, Suite 300  
San Francisco, CA 94107  
Phone (415)255-8077 Fax (925)887-4702  
[www.BioMaAS.com](http://www.BioMaAS.com)

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June 5, 2020

San Mateo County Planning Commission  
[planning-commission@smcgov.org](mailto:planning-commission@smcgov.org)  
[mschaller@smcgov.org](mailto:mschaller@smcgov.org)

**Subject: MidPen Housing Cypress Point Housing Project, Moss Beach CA  
Biological Resources Assessment**

Dear Commissioners Hansson, Gupta, Santacruz, Ramirez and Ketcham,

BioMaAS peer reviewed the Biological Resources Assessment (BRA) for a proposed 71 affordable housing unit subdivision at the corner of Sierra and Carlos Streets, in Moss Beach, San Mateo County, California, prepared by De Novo Planning Group on May 24, 2018. Two additional documents, BKF's May 2, 2018 Cypress Point Hydromodification Management Memorandum, and the Stevens Consulting Cypress Point Project Public Services And Utilities Report, were utilized as references during our peer review of the BRA, but these documents were not peer reviewed for content.

My qualifications and experience are as follows.

Over 20 years of experience working throughout California on projects involving environmental consulting, biological assessments, special status species studies and management, environmental compliance, habitat restoration, and mitigation.

USFWS Section **10(a)(1)(A)** Recovery Permit holder for California red-legged frog, San Francisco garter snake, Alameda whipsnake, salt marsh harvest mouse and California tiger salamander.

A copy of my CV is attached.

## **General Comments**

Based on our review, we believe that there are several sections of the BRA that should be clarified or expanded to include more pertinent information, and adequate analysis of project impacts and mitigations.

While the document lists various federal state and local regulations under the heading of regulatory setting, there is not much discussion as to how the listed regulations apply to this particular project, or what the implications of those regulations will be. The BRA entirely fails to analyze if the project will potentially violate the federal Endangered Species Act, the federal Clean Water Act, California's Fish & Game Code, California's Wetlands Conservation Policy, the Coastal Act or San Mateo County's Local Coastal Program. Further, while noting that there are 20 special-status plant species and 10 special status wildlife species within 5 miles of the project site, the BRA indicates that most species are "absent" (none observed during surveys), rather than giving a level of potential for their occurrence and gives little justification regarding those "absent" findings. An explanation for the rationale behind labeling of species as absent is warranted.

In addition, a more thorough discussion of potential mitigation measures, including agency consultation, should be included regarding some of these species.

Finally, as described further below, the BRA fails to adequately describe potential impacts to wetlands and how potential impacts could be mitigated.

## **Specific Comments**

### Project Description

An adequate analysis of biological impacts must be based on an adequate description of the project. Our review of the BRA reveals only that "the proposed project would result in construction activities that would change a portion of the 10.88-acre parcel into medium high-density housing, and that "the ground-disturbing activities on the site will consist of demolishing the existing foundations and grading the site."

The BRA should provide a description of all actions associated with the proposed project. Of particular concern to project impacts on wetlands and riparian habitat, the BRA makes only vague reference to drainage being "directed away from" the adjacent creek. This contrasts with BKF's May 2, 2018 Cypress Point Hydromodification Management Memorandum and the Stevens Consulting Cypress Point Project Public Services and Utilities Report which both state that excess stormwater runoff surface flows ultimately discharge to Montara Creek. The BRA should provide a more thorough description of the location, volume, and rate of drainage in order to adequately evaluate impacts to the adjacent Montara Creek. A map of the projected drainage should also be included.

### Environmental Setting

As an initial observation, it has been almost 2 years since the project site was last surveyed by De Novo. Circumstances may have changed in this period and it would be prudent to re-survey the site and adjacent habitat.

The BRA states that based on field surveys the potential for each special-status species to occur within the project site was evaluated as either “No Potential,” “Potential,” or “Present.” However, BRA’s findings on species “presence” reported in Table 1 fails to use these classifications. This is more than just a technicality. For example, the BRA defines “Potential” as “Some of the habitat components meeting the species requirements are present, and/or only some of the habitat on or adjacent to the site is unsuitable.” By failing to use this classification system, the reader of the BRA is deprived an understanding of the survey findings and thus at a loss to understand project biological impacts.

Further, Table 1 simply lists many species as “absent” which can’t be proven by lack of observation. The BRA - in many instances - fails to explain the justification for its determination of a species as absent. In addition, Table 1 identifies Fragrant fritillary as absent, but surveys were not conducted during the June to September period when this plant is in bloom.

The BRA’s “California red-legged frog” section does not mention the relatively close proximity of the species occurrence within the adjacent Montara Creek. To adequately analyze project impacts, the BRA must explain why the proposed project site does not provide suitable upland habitat for the species.

#### Project Impacts

As noted above, the BRA entirely fails to analyze if the project will potentially violate the federal Endangered Species Act, the federal Clean Water Act, California’s Fish & Game Code, California’s Wetlands Conservation Policy, the Coastal Act or San Mateo County’s Local Coastal Program. There are species protected by the federal Endangered Species Act and California’s Fish & Game Code – including San Francisco garter snake, California red-legged frog, and birds of prey – that are noted in the BRA, which make analysis of potential violations of the regulations essential.

Table 1 mentions that the San Francisco garter snake is potentially present, and that the “drainage north of site provides limited habitat, cypress along northern boundary is potential upland.” Given this, the BRA fails to adequately analyze potential impacts to this species.

In the “San Francisco dusky-footed woodrat” section, the BRA provides inadequate justification for its conclusion that construction activities would not impact this species. Because this species occurs in scrub habitats in addition to forest, it would be prudent for all vegetated areas within the proposed project area to be thoroughly surveyed. The BRA does not make it clear that this has been done, and thus its conclusion is suspect.

In regard to bats, the BRA states that no bats were observed during surveys, but does not specify if a bat survey was conducted. Trees provide potential bat habitat but were omitted from the BRA’s discussion of suitable bat habitat.

For Impact BIO-3, the BRA states “The closest recognizable wetlands are approximately 350 feet to the north near 16th street, and approximately 600 feet to the west in the Pacific Ocean. Neither construction nor operation of the project would have a substantial adverse effect on these nearby wetlands, given the distance of these wetlands to the project site, and the fact that drainage from the site will be directed away from the adjacent stream.” Yet, the BRA fails to provide a detailed description of the project drainage, which likely will adversely impact wetlands.



The BRA does not mention the retention ponds proposed as part of the site. In contrast, BKF's May 2, 2018 Cypress Point Hydromodification Management Memorandum states that there will be post-project drainage towards "the bioretention areas" which will have a "6,500 square foot footprint," and that "this configuration will be adjusted accordingly as *more* bioretention areas are introduced into the site plan."

The Stevens Consulting Cypress Point Project Public Services and Utilities Report at Section 7.4.1 reveals that the project site slopes range from 10 percent to 50 percent, there is no existing storm drain infrastructure on the property, and that "stormwater ultimately discharges to Montara Creek within the James V. Fitzgerald Area of Specific Biological Significance (ASBS) watershed area." In addition to stormwater from the 11-acre project site, there is an additional one (1) acre of offsite runoff that drains through the project site and contributes to the overall drainage area.

Drainage out of the retention ponds and stormwater runoff has the potential to adversely impact wetlands.

In addition, project retention ponds may function as habitat, or as an attractive nuisance, for California red-legged frogs by luring them to breed at a site where reproductive success is unlikely. The BRA omits the necessary analysis of these potential adverse impacts, and thus also omits any discussion of potential mitigation measures.

#### Mitigation Measures

The BRA's discussion of mitigation measures appears inadequate, as it includes no discussion with the US Fish & Wildlife Service or CDFW to avoid "take" of California red-legged frog, San Francisco garter snake, San Francisco dusky-footed woodrat, and bats.

Regarding Mitigation Measure Bio-2, the BRA fails to include surveys for all protected bird species. In addition to raptors, other native nesting birds should be protected from disturbance. Preconstruction surveys should be conducted and there should be communication with CDFW to avoid take of active nests if they are discovered.

The BRA fails to include an analysis of proposed methods to prevent adverse wetland impacts, including the methods to be used and their location, both during and after construction.

If you have any questions or comments, please feel free to contact Steve Powell, 510-734-7286.

Regards,



Steve Powell  
BioMaAS Inc.  
1278 Indiana St. #300  
San Francisco, CA 94107





**Years of Experience**  
23

**Expertise**  
Senior Permitted Biologist

**Education**  
B.S. (Biology) at California State University, Hayward, 1998.

**Registrations/Certifications**  
Certified Marbled Murrelet Surveyor

**Permits**  
USFWS Section **10(a)(1)(A)** Recovery Permit (**TE-107075-3**) for California red-legged frog, San Francisco garter snake, Alameda whipsnake, salt marsh harvest mouse and California tiger salamander.

Steve Powell, B.S.  
Principal, Biologist

## Experience

Mr. Powell is a permitted biologist for San Francisco garter snake, California red-legged frog, California tiger salamander, salt marsh harvest mouse, and Alameda whipsnake. He has over 23 years of experience working on projects in endangered species habitat, dealing with issues of environmental compliance, endangered species management and habitat restoration.

With experience as a biologist, environmental inspector, researcher, consultant, project manager, and monitor, Mr. Powell has extensive field experience and has conducted numerous studies throughout a broad range of wildlife and biological communities in California. Mr. Powell is skilled in vertebrate identification, taxonomy, natural history, California special status species survey methods, and habitat assessments. Mr. Powell also has extensive experience in monitoring efforts, habitat preservation, mitigation, restoration, trapping and relocation for the California red-legged frog, foothill yellow-legged frog, California tiger salamander, salt marsh harvest mouse, San Francisco dusky-footed woodrat, Alameda whipsnake, San Francisco garter snake, Western pond turtle, and burrowing owl.

Mr. Powell has conducted surveys and habitat assessments for a variety of other species including California Ridgway's rail, California black rail, Swainson's hawk, Northern goshawk, California spotted owl, Western snowy plover, marbled murrelet, San Joaquin kit fox, bats, and valley elderberry longhorn beetle. Mr. Powell has also contributed to many fish surveying and relocation projects, which involved species such as steelhead and delta smelt.

His environmental document writing experience includes: Environmental Impact Reports, Management Plans, Invasive Plant Management Programs, Nesting Bird Reports, Habitat Conservation Plans, restoration plans, and Biological Assessments. Mr. Powell has managed many biological projects and performed functions such as oversight, training, deployment of personnel, and budget management.

## Relevant Experience

### **Alameda Creek Diversion Dam – Fish Passage Facilities Project, Sunol, California** **Owner: San Francisco Public Utilities Commission**

Mr. Powell was an agency-approved monitor and environmental inspector. He performed preconstruction surveys for Alameda whipsnake, California tiger salamander, California red-legged frog, Foothill Yellow-legged frog (FYLF), Western pond turtle, bats, San Francisco dusky-footed woodrat, and nesting birds. He conducted surveys and relocation of several dozen FYLF egg masses and monitored their survival over three seasons. He relocated dozens of adult and juvenile FYLF as well. He also relocated dusky-footed woodrats, CRF, and AWS. He also conducted acoustic monitoring and exclusion for bats. His duties included construction access road inspections to minimize Take of special status species, wildlife exclusion fence inspection, daily compliance reports, environmental training, and speed limit enforcement on site.



**Caltrans Devil's Slide Hwy 1 Tunnel Project, San Mateo County**

***Owner: Caltrans District 4***

Mr. Powell was responsible for environmental and biological monitoring at three project sites, including quality assurance for contractor implementation of water quality measures, erosion control, spill and containment, SWPPP compliance inspection, water sampling, ESA and wildlife fence inspection, and biological monitoring for California red-legged frog, San Francisco garter snake, migratory birds, and San Francisco dusky-footed woodrat. Pre-construction work included trapping and relocation of California red-legged frogs and relocation of San Francisco dusky-footed woodrats outside of the construction area as well as nesting bird surveys. Mr. Powell functioned as the lead construction and biological monitor for south and north portal work on the Devil's Slide Hwy 1 Tunnel Project.

**Calera Creek Wetland Restoration Project, San Mateo County, CA**

***Client: City of Pacifica Department of Public Works***

Mr. Powell conducted trapping and visual surveys for San Francisco garter snake, Western pond turtle, California red-legged frog, and San Francisco dusky-footed woodrat. He also took samples and collected data on water quality. He compiled the data into a report and created a habitat management plan which improved and maintained habitat for California red-legged frog, San Francisco garter snake, western pond turtle, and San Francisco dusky-footed woodrat through control of invasive vegetation, and enhancement of upland and wetland vegetative cover.

**Bean Hollow Ponds Management, Pescadero, CA**

***Client: San Mateo County Public Works Department***

Mr. Powell is involved in the management of several wetland sites that provide habitat for San Francisco garter snake and CA red-legged frog. We are currently conducting nocturnal and diurnal surveys and are developing an on-site habitat enhancement plan to enhance and create more wetland habitat near the existing ponds.

**San Francisquito Creek Flood Reduction, Ecosystem Restoration, and Recreation Project, Palo Alto, CA**

***Owner: San Francisquito Creek Joint Powers Authority***

Mr. Powell was the USFWS approved permitted biologist and fisheries biologist for a levee improvement and salt marsh restoration project in salt marsh adjacent to San Francisco Bay. Mr. Powell's responsibilities included: preparing species avoidance plans for California Ridgway's rail, salt marsh harvest mouse, and anadromous fish, preparing environmental education program, identification of any salt marsh harvest mice and other rodents encountered within the project area, Resource Agency consultation, environmental compliance management and, compliance monitoring, pre/post construction surveys for saltmarsh harvest mouse and California Ridgway's rail, relocation of several thousand fish during dewatering, coordination of contractor and environmental monitors, and ensuring the integrity of the exclusion fencing. Mr. Powell identified Salt marsh harvest mice and western harvest mice on the project. Other special status species included California Ridgway's rail, California black rail, Western pond turtle, California red-legged frog, green sturgeon, and steelhead.

**Tyler Ranch Caltrans Mitigation Site, Alameda Co., California*****Owner: Caltrans District 4***

Mr. Powell participated in the design and implementation of an Alameda whipsnake trapping program to determine the presence and distribution of this listed species within a proposed Caltrans mitigation site located on Tyler Ranch. Whipsnakes were marked and photographed as part of an effort to ascertain population size. He also conducted aquatic sampling to determine the presence of California tiger salamander and California red-legged frog within wetlands on and adjacent to the property. Mr. Powell captured and marked Alameda whipsnakes and trapped numerous California red-legged frogs during the project.

**Biological Constraints Analysis for Proposed Crow Canyon Road Safety Improvement Project.*****Owner: Alameda County Public Works***

Mr. Powell conducted a biological constraints analysis for 13 proposed road improvements at a number of locations along Crow Canyon Road. The constraints analysis included a review of literature and field surveys to determine the extent of previous biological surveys and the species and habitats known or likely to occur along the segment. Special status species included: CA red-legged frog, CA tiger salamander, and western pond turtle

**Old Niles Project, Alameda Co. CA*****Owner: Caltrans District 4***

Conducted pre-construction surveys prior to retaining wall installation on Niles Canyon Road adjacent to Alameda Creek. Special status species within the area included California red-legged frog, foothill yellow-legged frog, Alameda whipsnake, and Central Coast ESU steelhead. Conducted nesting bird surveys and mapped nests within and adjacent to the project area.

**San Pedro Creek Bridge Replacement Project, Pacifica, CA*****Owner: Caltrans District 4***

As project manager, Mr. Powell performed nesting bird deterrence, listed species relocation, biological monitoring and environmental inspection during vegetation removal for a bridge replacement and dredging project in California red-legged frog (CRF) and steelhead habitat. He conducted daily bird surveys and bird deterrence during the nesting season to prevent nesting birds from delaying the start of the project. This work included removing nest-starts and installing deterrents to nesting. He conducted preconstruction surveys and a habitat assessment for CRF and steelhead and relocated numerous CRF egg masses and adults from the work area. He also relocated nests of San Francisco dusky-footed woodrats and monitored the removal of trees and other vegetation prior to the start of construction

**Route 92 West Albert Canyon Mitigation Project, San Mateo Co.*****Owner: Caltrans District 4***

Mr. Powell was responsible for environmental and biological monitoring on a culvert repair and creek bank restoration project on highway 92. Special status species on



site included California red-legged frog, San Francisco dusky-footed woodrat, and central coast steelhead. Mr. Powell also conducted pre-construction surveys, nesting bird surveys, contractor education, completed daily reports, and removed wildlife from the construction area. After concrete was poured to line the inside of a culvert, a plastic detention basin surrounded by exclusion fence was constructed at the pipe outfall to prevent entry by California red-legged frog. Mr. Powell conducted daily water tests on the discharge from the pipe to check the pH and determine when it was safe to be released downstream. Until the proper pH levels were reached, water was pumped from the fenced detention basin and into a truck for disposal.

#### **SMART CP4 Haystack Landing Bridge Replacement, Petaluma, CA**

##### ***Owner: Sonoma Marin Area Rail Transit (SMART)***

Mr. Powell was the Service-Approved lead biologist on a railroad bridge replacement project over the Petaluma River. His responsibilities included oversight of the biological monitors and contractor to ensure resource agency permit compliance with the federal Biological Opinion and all project permits. Of special interest on this project were water quality concerns due to working in a live river, impacts to fish during dewatering, and impacts to special status species during vegetation clearing and ground disturbance. Special status species in the area included salt marsh harvest mouse, California red-legged frog, California clapper rail, Delta smelt and green sturgeon.

#### **Mare Island Salt Marsh Harvest Mouse Habitat Assessment, Vallejo, CA**

##### ***Owner: U.S. Navy***

Mr. Powell conducted habitat assessments for salt marsh harvest mouse (SMHM) at several sites throughout the Mare Island Naval Base. As a permitted SMHM biologist, he conducted site visits to multiple locations to assess the potential for SMHM to occur within proposed project areas and wrote reports detailing the results. He also reviewed reports of other biologists for accuracy.

#### **I-680 Highway Widening, Pleasanton, CA**

##### ***Owner: Caltrans District 4***

As a CDFW/USFWS-approved biological monitor, Mr. Powell performed preconstruction surveys, camera trapping, live-trapping, and midden relocation for San Francisco dusky-footed woodrat next to the Bernal Ave. onramp on I-680. He assisted in the relocation of over a dozen woodrat middens. He inspected trapped adult woodrats to evaluate their reproductive status, lactating females were returned to their nests, other woodrats were relocated along with their middens.

#### **SFPUC Water System Improvement Program Crystal Springs-San Andres Pipeline Upgrade Project, San Mateo Co. CA**

##### ***Owner: San Francisco Public Utilities Commission***

Mr. Powell conducted environmental and biological inspection for compliance during a water pipeline improvement project. He monitored construction activities such as de-watering, excavation, rip-rap placement, drilling, and demolition of concrete structures. Special status species within the project area include; San Francisco garter snake, California red-legged frog, Western pond turtle, Central California Coast ESU steelhead, San Francisco Dusky-footed woodrat, and migratory



nesting birds. Mr. Powell also conducted preconstruction surveys, contractor education, filed daily reports documenting compliance, and relocated special status species.

**Surveys and Exclusion Activities for the Permit-level Composting Facility at the Altamont Landfill and Resource Recovery Facility**

**Client:** *Waste Management of Alameda County*

Mr. Powell conducted protocol-level surveys for the San Joaquin kit fox, CA red-legged frog, CA tiger salamander, and burrowing owl. Surveys included spot lighting, track dusting, and burrow surveys. Owls were found in the construction footprint, and coordination with CDFG biologists allowed for passive exclusion the owls from burrows so that construction could continue. Mr. Powell also conducted surveys for Alameda whipsnake.

**PG&E Jefferson-Martin 230 kV Line Installation Project, San Mateo County**

**Owner:** *PG&E*

Mr. Powell was responsible for permitted biological monitoring and conducting surveys for special-status species including the California red-legged frog, San Francisco garter snake, and San Francisco dusky-footed woodrat on the Jefferson-Martin 230 k-V Line Project adjacent to San Andreas Reservoir. Efforts included a capture and relocation program for these species to remove them from the construction zone and providing a permitted construction monitoring team as required by the project permits. He relocated many CRF and SFGS by hand and through trapping, and relocated woodrat middens.

**PG&E San Francisquito Creek Emergency Pipeline Repair Project, Santa Clara County, CA**

Mr. Powell provided project management, and environmental/biological monitoring during an emergency PG&E project that involved the dewatering of an approximate 100-foot stretch of stream to facilitate the repair of a 24-inch gas pipeline which crossed below the creek bed. Central coast ESU steelhead were relocated from the project area prior to pipeline repair. He conducted preconstruction surveys for CA red-legged frog and CA tiger salamander, and bats. After the completion of construction, he directed the installation of erosion control and the revegetation of the area with native plants. He conducted quarterly assessments of the revegetation and the status of the creek as suitable anadromous fish habitat over the course of 5 years.

**Three-year fish survey of lower Delta marsh channels, Contra Costa County, CA**

**Client:** *Cal Fed*

Mr. Powell conducted a three-year fish survey of restored lower Sacramento-San Joaquin Delta marsh channels to determine their use by native California species including the federally and state threatened Delta smelt (*Hypomesus transpacificus*). We successfully adapted standard fish capture methods to function well in Delta marsh drainage channels with strong tidal flows. This permitted quarterly sampling of all fish entering and leaving restored and preserved marshes over a three-year period.



GAY LAWRENCE PANG, C.E.T.E.

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May 1, 2020

Law Offices of Brian Gaffney APC  
446 Old County Rd, Suite 100-310  
Pacifica, CA 94044  
ATTN: Brian Gaffney  
Attorney at Law

Re: Cypress Point TIA  
Moss Beach  
San Mateo County, California  
PLN2018-00264

Dear Mr. Gaffney:

We have "peer reviewed" for the proposed Cypress Point "Affordable" Apartment Residential Development at the northeast corner of Carlos Street and Sierra Street in Moss Beach and San Mateo County, CA, the following documents:

1. Traffic Impact Analysis (TIA), dated April, 2019 by Kittelson & Associates, Inc. in Oakland, California;
2. State of California, Department of Transportation (CalTrans) letter response, dated April 9, 2018;
3. CalTrans letter response, dated August 29, 2018;
4. San Mateo County Civil Comments-Traffic, dated September 24, 2018;
5. Executive Summary of the "Connect The Coastside" Report, January 15, 2020.

Our comments, questions, concerns, TIA omissions, and/or constructive suggestions are to gain a better understanding of the project impacts for the Transportation and Traffic elements. Several items are enumerated, and include but are not limited to this partial list, e.g. Trip Generation, Trip Distribution and Assignments, count data, Level of Service (LOS) analysis, parking, access and circulation, proposed Mitigation Measures at the critical intersections, Vehicle Miles Traveled (VMT), and other miscellaneous items.

The proposed project is a 71 Dwelling Unit (DU) "affordable" apartment complex on 10.875 acres of vacant land. It is assumed that the development is "apartments", since the TIA utilizes Land Use 220 or "apartments" within the Institute of Transportation Engineers (ITE) Trip Generation Manual.

PO BOX 4255  
MOUNTAIN VIEW  
CA 94040

(650) 465-2006

## 1. TRIP GENERATION

The TIA project trip generation estimates referenced the 9<sup>th</sup> Edition of the Institute of Transportation Engineers (ITE) Trip Generation Manual, which subsequently has been updated to the 10<sup>th</sup> Edition around April, 2018. As the TIA was initiated with critical intersection counts collected during April, 2017, it is understandable that the 9<sup>th</sup> Edition was utilized at that time. However, with the subsequent delay in the release of various draft versions of the TIA in January, 2018, as evidenced by the CalTrans comment letter of April 9, 2018, and the July 2018 Planning Permit Application Referral noted in the CalTrans letter of August 29, 2018, and then the release of the latest version of the TIA dated April, 2019, there is a concern about the accuracy of the TIA trip generation estimates given the lack of review for compatibility and comparison with the latest or 10<sup>th</sup> Edition.

The TIA omits the daily weekday trip generation estimates for the proposed project.

Here are other potential comparisons for weekday daily, AM and PM peak hours, and Saturday peak hours:

### DAILY:

9<sup>th</sup> Edition Estimate = 473 trips (average method); missing from TIA;  
9<sup>th</sup> Edition Estimate = 554 trips (with "equation");  
10<sup>th</sup> Edition Estimate = 520 trips (average method);  
10<sup>th</sup> Edition Estimate = 496 trips (with "equation");

### AM:

9<sup>th</sup> Edition Estimate = 37 trips (average method); shown in TIA;  
9<sup>th</sup> Edition Estimate = 39 trips (with "equation");  
10<sup>th</sup> Edition Estimate = 33 trips (average method);  
10<sup>th</sup> Edition Estimate = 35 trips (with "equation");

### PM:

9<sup>th</sup> Edition Estimate = 45 trips (average method); shown in TIA;  
9<sup>th</sup> Edition Estimate = 57 trips (with "equation");  
10<sup>th</sup> Edition Estimate = 40 trips (average method);  
10<sup>th</sup> Edition Estimate = 44 trips (with "equation");

### SATURDAY Peak Hour:

9<sup>th</sup> Edition Estimate = 37 trips (average method); shown in TIA;  
9<sup>th</sup> Edition Estimate = 49 trips (with "equation");  
10<sup>th</sup> Edition Estimate = 54 trips (average method);  
10<sup>th</sup> Edition Estimate = 44 trips (with "equation").



Best practice would have been for the TIA's AM peak hour estimate to utilize the higher of the average vs equation methods or 39 trips, to represent a conservative approach. However, the 37 AM peak hour trips in the TIA are slightly LESS than the 39 trips for the 9<sup>th</sup> Edition. The estimates could be slightly reduced if the 10<sup>th</sup> Edition is utilized from 37 in the TIA to 35.

The PM peak hour estimate should also have utilized the higher of the average vs equation methods or 57 trips. The 45 trips in the TIA are LESS than the 57 trips for the 9<sup>th</sup> Edition. The estimates could be reduced if the 10<sup>th</sup> Edition is utilized from 45 in the TIA to 44.

The Saturday peak hour estimate should have utilized the higher of the average vs equation method or 49 trips. The 37 trips in the TIA are LESS than the 49 trips for the 9<sup>th</sup> Edition. The estimates would be increased if the 10<sup>th</sup> Edition is utilized from the 37 in the TIA to 54.

The TIA's trip generation numbers are different from the ITE manual. The TIA analyses failed to: (1) include the estimated DAILY trips for the proposed project (an omission); (2) use the HIGHER of the average vs equation methods; and (3) use the updated 10<sup>th</sup> Edition from ITE.

Because of these errors and omissions, the TIA's estimates of Project trip generation are unreliable, and unless corrected, should not serve as the basis for conclusions about Project traffic impacts.

## 2. TRIP DISTRIBUTION AND ASSIGNMENTS

The Project Trip Distribution along State Route 1 is shown on Table 4, page 26 of the TIA. The TIA states that "the distribution of Project trips was derived from existing travel volume data and from knowledge of the local travel times". The problem with this statement is that there is no disclosure of the time frame of the CalTrans SR 1 "seasonally" adjusted volume estimates referenced. Thus, the peer reviewer does not know if trip volume estimates were based on the April, 2017 critical intersection counts, or something else, such as a travel demand model? That foundational information must be provided to properly assess the trip distribution.

Additionally, the TIA fails to provide a "Figure" which shows the percent of traffic distribution to the local streets. Table 4 only indicates the traffic distribution along SR 1.

Further, the TIA fails to disclose the project driveway volumes shown at an “unnumbered” intersection with Carlos Street. This is important information to assess the estimated trip generation percentages from the north and south on Carlos Street. While TIA Figure 7 on page 27 shows the estimated project trip distribution, there is no driveway “intersection” disclosure as previously noted. Thus, project traffic volumes on the local streets are impossible to discern without the percentages.

The potential redistribution of the estimated project trips, along with the desire to update or revise the trip generation estimates with new information, has a direct bearing on the trip assignments at the project driveway, as well as at all critical intersections.

Because of these omissions, the TIA’s estimates of Project trip distribution are unreliable, and unless corrected should not serve as the basis for conclusions about Project traffic impacts.

### 3. COUNTS

Appendix 2 of the TIA contains the counts at the critical intersections which were collected during April, 2017. At this point, these traffic counts are three years old. Thus, they cannot be relied upon for assessments of traffic impacts.

Rather than reliance on outdated traffic counts to accurately estimate traffic impacts, the counts should be redone to reflect more typical current expected 2020 traffic patterns (excluding the coronavirus issues), and be conducted to reflect traffic when school is open as well as a typical Summer weekday and weekend day (Saturday) traffic. Along with the outdated counts, the “seasonally” adjusted volumes utilized in the TIA remains unclear as to how they were determined. Additional clarity is required to evaluate traffic impacts to also reflect the Summer months recreational traffic and school period traffic on certain movements.

Since there is the potential for a lot of variation in the actual counts, the TIA should include both a typical school day and a Summer day be counted to adequately assess the traffic impacts.

There were several Summer months over the last three years available for additional counts. There could have been selected counts performed, especially at the critical intersections that are shown in the TIA to be significantly impacted.

The school year and Summer month traffic volumes should be compared and the HIGHER one or “worst” case utilized for the Level of Service (LOS) calculations at the critical intersections.



#### 4. LEVEL OF SERVICE (LOS)

The errors and omissions from the TIA's estimated project trip generation, omissions from the TIA's trip distribution and assignment discussion, the lack of any "growth" factors due to the delay of nearly 3 years for "existing" and Summer traffic counts, and the omission of an updated list of "approved" projects, all are factors which make the TIA's LOS calculations unreliable.

On that basis, ALL of the LOS calculations should be redone based on proper trip generation estimates, accurate trip distribution and assignments, and updated traffic counts as discussed above. In the absence of modified LOS calculations, the TIA's current LOS results should not serve as the basis for conclusions about Project traffic impacts.

Additional comments are provided in the Traffic Mitigation section.

Notwithstanding the above flaws, the LOS calculations shown in the TIA indicate significant traffic impacts at some of the critical intersections, and should not be ignored.

#### 5. PARKING

The proposed on-site parking on the Site Plan indicates 142 stalls, or 2 stalls per apartment dwelling unit. That is 15 parking stalls in excess of the San Mateo County code requirement of 127 stalls. See TIA Table 18, page 60.

The TIA utilized the 4<sup>th</sup> Edition of the Parking Generation Manual. Since 2017 there is a 5<sup>th</sup> Edition released in April, 2019 available. What is troubling is that the TIA utilizes Land Use #221 and not Land Use #220 available in the 5<sup>th</sup> Edition. Thus, this portion of the TIA should be updated, e.g. Table 19, page 61.

Further analysis is required to include not only the average parking generation rates but also the 85<sup>th</sup> percentile values, and compare that with the San Mateo County code requirements.

Notably, if the goal is to reduce the project traffic impacts with less traffic, then the increase in the project parking supply above the San Mateo County code requirements will have the opposite effect.



## 6. ACCESS AND CIRCULATION

Based on the review of the Site Plan (page 12), we understand that only one driveway is proposed to provide project vehicular access to and from Carlos Street. The driveway is in close proximity to Intersection #3, SR-1/Carlos Street, as well as Intersection #4, Carlos Street/Sierra Street. There is an emergency access to Lincoln Street to the east (page 46).

A more detailed Driveway/Carlos Street intersection design or sketch is required to indicate how the project vehicular operations will be implemented.

There are likely to be significant adverse traffic impacts from the proposed project Driveway/Carlos Street intersection operations. These operational issues should be analyzed further before project approval. Currently, operational traffic issues from inadequate sight distance, inadequate turning radii, and others, have not been adequately analyzed, mitigated, or avoided.

## 7. MITIGATION MEASURES

The proposed Mitigation Measures are in the TIA starting on page 49.

In reference to the significant traffic impacts based on the LOS calculations for the Existing Conditions or TRAF-1, the TIA discusses mitigations TRAF-1A and TRAF-1B.

### TRAF-1A

Intersection #7 or SR-1/California Avenue-Wienke Way for the PM peak hour and Saturday peak hour:

The conversion of the existing two-way STOP control into a roundabout or signalized intersection is the proposal with a determination upon the completion of the Intersection Control Evaluation (ICE) study required by CalTrans. This is an unresolved mitigation measure as there has not been a completion of the ICE study nor any information regarding the potential "fair share" cost sharing aspects with the proposed development. In the absence of this information about who will pay or the ICE results, the mitigation's feasibility is unknown.

The ICE study and the Connect to Coastside Study recommendations, when completed, should be included in an updated TIA analysis.

Without the ICE Study and without a "fair share" cost sharing agreement, this proposed mitigation measure is incomplete, unenforceable, and cannot be relied upon for a conclusion of a less than significant traffic impact.

#### TRAF-1B

“Develop a Transportation Demand Management (TDM) Plan for the review and approval by San Mateo County”.

In the absence of a TDM Plan, it is impossible to assess its feasibility or how it will potentially mitigate acknowledged significant traffic impacts.

The TIA indicates that “the effectiveness of a TDM plan cannot be guaranteed” (page 50). CalTrans has also commented on this issue, as well as prior San Mateo County Civil (Traffic) responses and suggestions. Thus, the proposed mitigation measure does not resolve the significant traffic impacts that have been identified.

In reference is to the significant traffic impacts based on the LOS calculations for the Background Conditions or TRAF-2, the TIA discusses mitigations TRAF-2A and TRAF-2B.

#### TRAF-2A

Intersection #7 or SR-1/California Avenue-Wienke Way for the PM peak hour and Saturday peak hour:

Similar to TRAF-1A and 1B above, those comments are repeated herein.

#### TRAF 2B:

Intersection #3 or SR-1/Carlos Street for the Saturday peak hour.

Three potential mitigation measures were considered (page 52):

1. Closing Carlos Street between SR-1 and the Project to all but emergency vehicles;
2. Connecting Carlos Street with 16<sup>th</sup> Street instead of SR-1;
3. Grading the east side of SR-1 to provide clear sight distance.

The TIA does not identify “feasible” mitigation measures for Item #1 above.

Item #2 above has geometric and topographic challenges, and right of way issues, which remain unresolved.

Item #3 above is a challenge to obtain the clear sight distance requirements. However, merely stating that a topographic map will be required is insufficient. There are other CalTrans issues not studied nor adequately discussed including but not limited to a “fair share” agreement for the right of way, and intersection and street improvement costs.

The TIA has not identified cost sharing for any of the above three mitigations, and that undermines the feasibility of the proposed mitigation measures as discussed above.



Also, the TDM Plan is once again mentioned and the prior response stated above in TRAF 1B applies.

In reference to the significant traffic impacts based on the LOS calculations for the Cumulative Conditions or TRAF-3, the TIA discusses mitigations TRAF-3A, TRAF-3B, and TRAF-3C.

#### TRAF-3A

Intersection #3 or SR-1/Carlos Street for the AM, PM and Saturday peak hours.

The TIA proposes to implement the TDM program or TRAF-1B, which has not as yet been developed nor submitted, is an unacceptable mitigation measure for the reasons above.

#### TRAF-3B

Intersection #6 or SR-1/Vallemar Street-Etheldore Street for the Saturday peak hour.

The TIA proposes to implement the TDM program or TRAF-1B which has not as yet been developed nor submitted, is an unacceptable mitigation measure for the reasons above.

An additional mitigation measure of a new traffic signal was analyzed and the peak hour signal warrant was not satisfied. Therefore, this is NOT an adequate proposed mitigation measure.

#### TRAF-3C

Intersection #2 or SR-1/16<sup>th</sup> Street for the PM peak hour and Cumulative with Project Condition.

The TIA proposes to implement the TDM program or TRAF-1B which has not as yet been developed nor submitted, is an unacceptable mitigation measure. The traffic signal peak hour warrant is not satisfied. Therefore, there is no mitigation measure that reduces the traffic impacts to less than significant.

In reference to the significant traffic impacts based on Design Features or TRAF 4, the TIA discusses mitigation TRAF-4A.

#### TRAF 4A

The SR-1/Carlos Street intersection (#3) has restricted sight distance along the east side of SR-1.

The proposed mitigation measure of TRAF-1B or a TDM program is unacceptable for the reasons above. The TIA fails to provide a design of this intersection to resolve the sight distance issues, along with a "fair share" agreement as to the future costs of any proposed intersection improvements, and other sight distance and intersection street improvements.

In reference to the safety of public transit, bicycle and pedestrian facilities or TRAF-5, the TIA discusses mitigations TRAF-5A and TRAF-5B.

#### TRAF 5A

Sidewalk construction mitigation measure should be a condition of development.

#### TRAF-5B

The proposed mitigation measure of distributing information is a given and not a true mitigation measure. The TIA fails to provide a sketch detailing the bus stop locations with signing, crosswalk markings if deemed feasible, and the correction with actual physical improvements of the inadequate sight distance along SR-1.

Additional continuing collaborative efforts with Sam Trans at a minimum should be required for all project related bus route changes, and the TIA should include analysis of impacts on traffic of such bus-related mitigation measures.

### 8. VEHICLE MILES TRAVELED

The concept of Vehicle Miles Traveled (VMT) should either complement or replace the LOS analysis depending upon the transition by San Mateo County to this type of analysis. However, it is important to note that VMT analysis does not eliminate nor remove the significant traffic impacts already noted with the LOS calculations within the TIA.

To accurately analyze traffic impacts, the TIA should provide estimates of the VMT for this proposed project to complement the results and traffic impacts from the LOS calculations.



## 9. OTHER

### A. Queues (TIA, page 63)

The TIA contains the queue calculations for the 95<sup>th</sup> percentile analysis at the request of CalTrans. It appears that the analyses are adequate assuming that the inputs were consistent. Nevertheless, there are issues previously mentioned with the trip generation, trip distribution and assignments, and “seasonally” adjusted counts that must be analyzed to properly reflect the project traffic impacts.

### B. CalTrans Comments

Two CalTrans comment letters have been submitted regarding the proposed project. The first is dated April 9, 2018 and the second August 29, 2018. Our comments are as follows:

#### CalTrans April 9, 2018 Letter

This Caltrans letter raises the issue of Vehicle Miles Traveled (VMT) and its goal to reduce VMT while tripling bicycle, and doubling pedestrian and transit travel. Their comments are based on the January 2018 Draft Traffic Analysis.

CalTrans indicates that “improvements to SR-1 may be necessary to accommodate increased vehicle, transit, pedestrian, and bicycle trips associated with the project”. There are many SR-1 challenges and multiple constraints affecting SR-1 which still MUST be evaluated before project approval. Some of the items raised by CalTrans, to the best of our knowledge, have NOT been adequately analyzed within the revised TIA of April, 2019. These include the following:

1. right of way (ROW) constraints and topography limit options for the Carlos Street/SR-1 intersection;
2. SR-1 has limited accommodations for transit users, cyclists, and pedestrians in his area;
3. sight distance and potential turning movement conflicts limit the options for intersection improvements;
4. accessing the coast or existing southbound SamTrans Route 17 bus stop, which runs on one-hour headways, requires crossing SR-1 at an unsignalized intersection;
5. accessing the northbound SamTrans Route 17 bus or the community of Montara requires walking along the shoulder of SR-1 for approximately 0.15 miles.

The TIA does not adequately address those issues. Not only should additional analyses be performed, e.g. a CalTrans ICE Study, but those items should be adopted prior to project approval.

The TIA still does not include an adequate nor detailed analysis for the issues such as the Carlos Street emergency vehicles only between project driveway and SR-1; 16<sup>th</sup> street, eastbound and westbound approaches, right turns only; and Vallemar Street/Etheldore Street, eastbound and westbound approaches, right turns only.

Also, the TIA proposes to convert the SR-1/California Avenue-Wienke Way intersection from a two-way STOP controlled into a roundabout or signalized intersection. However, while there are some LOS calculations in the Appendices of the TIA, an actual sketch or preliminary design for either a signalized intersection or roundabout has not been included within the revised TIA.

The TIA has however, included a queue analysis for vehicular storage as previously noted, but has NOT analyzed the truck U-Turn issue at critical intersections.

With respect to Multimodal Planning, Caltrans has identified a “Fair Share” contribution concept “toward multimodal and regional transit improvement to fully mitigate cumulative impacts to regional transportation”. The “fair share” contribution concept has not been included within the revised April, 2019 TIA.

Additionally, CalTrans has suggested a Pedestrian Hybrid Beacon (PHB) be evaluated and considered with high visibility crosswalk at the SR-1/14<sup>th</sup> Street intersection, and the relocation of the SamTrans route 17 southbound bus stop to that location across from the existing northbound stop. Neither of those suggestions were adequately analyzed, with the PHB issue completely ignored within the revised April, 2019 TIA.

Primary and secondary effects on pedestrians, bicyclists, disabled traveler, and transit user have not been adequately analyzed within the revised TIA.

A robust TDM Program is suggested by CalTrans to reduce VMT. The revised TIA has not adequately analyzed the development of a TDM Program yet indicates that there are no guarantees involved in reducing traffic impacts.

CalTrans has noted that “any proposed non-standard design feature (such as inadequate sight distance) will have to be approved by a Fact Sheet for Exceptions to Mandatory and/or Advisory Design Standards prior to implementation.” The revised TIA has not moved forward with any sketches regarding the sight distance inadequacy along SR-1.



## CalTrans August 29, 2018 Letter

This Caltrans letter refers to the Application Referral. It duplicates the first letter with respect to the VMT issue, and multimodal planning. New issues include hydraulics, as well as the Travel Demand Analysis and Mitigation wherein “the July, 2018 TIA has not been updated to reflect CalTrans’ comments on the January 2018 Draft Traffic Analysis”. Nor has the “fair share” contribution concept been included within the revised TIA, and it is again mentioned herein.

The VMT reduction is once again mentioned and has not been analyzed within the revised TIA.

CalTrans has commented that “reducing parking supply can encourage active forms of transportation, reduce regional VMT, and lessen future transportation impacts on State facilities”. Yet the proposed project has a parking supply of 142 stalls or 15 stalls ABOVE the San Mateo County code required amount of 127 stalls.

The revised TIA has failed to address many of the comments from CalTrans’ two letters. This points to the TIA’s continued failure to adequately analyze project impacts and feasible mitigation measures.

### C. San Mateo County Comments

San Mateo County has provided Civil (Traffic) comments. Nine items were listed, and the key items are:

Item #4: “the proposed turn restrictions as mitigation measures are not acceptable. Please provide alternative mitigation measures to address project significant impact at Highway 1 and Vallemar/Etheldore and Highway 1 and 16<sup>th</sup>.” (Not included within the revised TIA);

Item #5: “the closure of Carlos Street to all motor vehicles other than emergency vehicles is not acceptable as a mitigation measure. Please provide other mitigation measures to address the project’s significant impacts.” (Not included within the revised TIA).

Item #6: SamTrans bus stop relocation is not a County project. It is up to the applicant to coordinate with SamTrans and provide all the necessary approvals from SamTrans to the County for review and consideration before the TIA can be approved. Please provide alternate mitigation measures in case SamTrans does not approve the proposed rerouting.” (Not included within the revised TIA).

Item #7: "Please provide documentation that supports the premise that a fully funded project is currently moving forward. Absent an assurance that a fully funded project is in the process of being implemented, the applicant will be responsible for mitigating the project's impacts." (Not included within the revised TIA).

Item #8: "If the applicant is proposing any TDM measures as mitigation, the measures need to be clearly defined and calculations shown as how many trips will be reduced by each measure and how that will impact the operations and LOS at the applicable intersections. In addition, please provide a monitoring measure to each of the TDM measures proposed and alternate measure in case the monitoring shows that TDM is not as effective as assumed." (Not included within the revised TIA).

The revised TIA has failed to address many of the San Mateo County Civil (Traffic) comments. This points to the TIA's continued failure to adequately analyze project impacts and feasible mitigation measures.

D. Traffic Infusion on Residential Environment (TIRE)

The Executive Summary of the Connect The Coastside Report refers to the extensive community outreach program. Curiously, the TIA does not include mitigation measures for street segments e.g. along Carlos Street, as that street serves the proposed project and has a traffic impact on the existing residential developments. A Traffic Infusion on Residential Environmental (TIRE) analysis which requires Average Daily Traffic (ADT) volumes for both a typical weekday and weekend day for two scenarios i.e. during the school year and for a Summer day, should be performed. The analysis and evaluation would include the comparison of the TIRE Index and the change in the index with the proposed project. The potential traffic impacts on at least two segments along Carlos Street, e.g. near the project site north of Sierra Street, and also north of Etheldore Street should be included. This evaluation would reveal whether or not the Carlos Street segments would be adversely impacted on those two segments.



## SUMMARY

This “peer review” of the April, 2019 TIA, CalTrans’ two comment letters, and the San Mateo County Civil (Traffic) comments for the proposed 71 dwelling units “affordable” apartment residential development, included a summary review of the Traffic Impacts that were listed as significant and unavoidable.

Additional clarification is required as to how these Traffic impacts will be mitigated appropriately and conditioned as part of the approval of the proposed project, with the comments and concerns previously indicated.

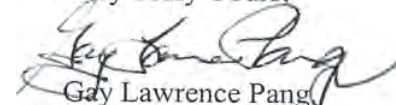
The estimated trip generation, trip distribution and assignments, traffic counts, the Level of Service (LOS) calculations for several scenarios, parking, access and circulation, the TRAF Mitigation Measures, Vehicle Miles Traveled (VMT), and residential street segments, all have some errors and omissions as noted above, which require further evaluation/clarification and should be analyzed in more detail.

Of particular concern is that many of the comments from Caltrans and the San Mateo County Civil (Traffic) comments do not appear to have been included in the revised April, 2019 TIA.

Our review indicates that there are potentially significant deficiencies, omissions, and inaccuracies within the TIA. It is our opinion that the deficiencies, omissions, and inaccuracies would require revisions and amplifications to arrive at an acceptable and complete evaluation of the traffic and transportation issues within a subsequent and additional revised TIA.

Reasonable, appropriate, and updated potential mitigation measures, along with conditions of development, any “fair share” contributions, and with the appropriate findings and conclusions, should be included within any revised evaluations.

Very Truly Yours,



Gay Lawrence Pang  
Civil Engineer #20,203  
Traffic Engineer #073

### Documents Reviewed

1. TIA dated April, 2019
2. CalTrans comment letter dated April 9, 2018
3. CalTrans comment letter dated August 29, 2018
4. San Mateo County Civil (Traffic) comments dated September 24, 2018
5. Executive Summary-Connect The Coastside, dated January 15, 2020



Technical Consultation, Data Analysis and  
Litigation Support for the Environment

2656 29<sup>th</sup> Street, Suite 201  
Santa Monica, CA 90405

Matt Hagemann, P.G., C.Hg.  
(949) 887-9013  
[mhagemann@swape.com](mailto:mhagemann@swape.com)

April 9, 2020

San Mateo County Planning Commission  
[planning-commission@smcgov.org](mailto:planning-commission@smcgov.org)  
[mschaller@smcgov.org](mailto:mschaller@smcgov.org)

**Subject: Comments on the MidPen Cypress Point Project, PLN2018-00264**

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Dear Commissioners Hansson, Gupta, Santacruz, Ramirez and Ketcham,

We write regarding the proposed MidPen Cypress Point Project ("Project") located in Moss Beach, California. MidPen proposes to develop 71 housing units, a community building, and outdoor recreation areas on the 11-acre Project site. I am a California-licensed hydrogeologist and the former Senior Science Policy Advisor with the U.S. EPA. My CV is attached for reference as Exhibit A.

To prepare the comments below, we have reviewed the Project's Preliminary Environmental Evaluation Report (PEIR) dated April 2019, the Phase I Report dated November 10, 2015, the Additional Subsurface Investigation and Water Well Evaluation dated February 20, 2018, the Groundwater Sampling and Well Destruction Report dated April 9, 2018.

Our review of the above documents leads us to conclude that the PEIR fails to adequately evaluate the Project's impacts in the subject areas of Hazards and Hazardous Materials and Hydrology and Water Quality. Impacts associated with construction and operation of the proposed Project are undisclosed and inadequately mitigated. An Environmental Impact Report (EIR) should be prepared to assess and mitigate the potential impacts that the Project may have.

## **Hazards and Hazardous Materials**

The PEIR fails to disclose residual soil contamination at the Project site. The Project site is a former World War II-era facility used for gunnery training. A November 10, 2015 Phase I Environmental Site Assessment (ESA), prepared for the Project, describes the Project site to have been used for barracks, offices, a mess hall, a library, a garage, a boiler room, and an incinerator.

On the basis of a Phase I recommendation, a Phase II ESA sampling investigation was completed. The Phase II ESA found two locations (Borings B-7 and B-21) where lead concentrations in soil exceeded the San Francisco Bay Regional Water Quality Control Board (RWQCB) Environmental Screening Level (ESL).

The concentrations of lead in those two samples, taken at the ground surface, was 230 mg/kg and 88 mg/kg, respectively. In contrast, the RWQCB ESL for lead in residential shallow soil is 32 mg/kg<sup>1</sup> based on terrestrial habitat exposure.

The lead contamination was attributed in the Phase I ESA to the use of lead paint. The Phase II ESA was followed by an additional investigation (the February 20, 2018 “Additional Subsurface Investigation & Water Well Evaluation”) that conducted further sampling for lead in soil. The additional investigation found lead at one location at concentrations above the ESL. The concentration of lead in soil at boring CS-3 was found to be 290 mg/kg – nine times the ESL. Figure 2 from the additional investigation is attached and shows that the horizontal extent of the lead contamination has not been determined.

The additional investigation, without any regulatory input, prescribed mixing of Project site soils upon excavation as a solution to the lead contamination. None of these lead contamination results, nor the suggested soil mixing plan, were disclosed in the PEIR. The mixing plan also does not address the fact that the horizontal extent of the lead contamination is unknown and that additional elevated lead soil concentrations (“hot spots”) may be found if further testing as conducted.

No documentation was provided in the PEIR, in the Phase I, the Phase II or the additional investigation to show that the results were shared with any regulatory agency. The Project site does not appear on the RWQCB Geotracker or the Department of Toxic Substances (DTSC) Control Envirostor websites and therefore the lead contamination that was found apparently has not been brought to the attention of the RWQCB or the DTSC.

The Phase I, the Phase II and the additional investigation basically self-certify that the sampling that was conducted and the analysis of the results do not pose a threat to human health with the soil mixing plan that is planned. The additional investigation concluded (p. 5):

On the basis of the information, presented herein, no further investigation or remedial action is warranted at this time.

Without regulatory review, this conclusion of no further action or remediation and the basis for this conclusion (all which was not disclosed in the PEIR), should not be relied upon for decision making about the potential risk to human health and the adequacy of the Mitigation Measure HAZ-1, the sole mitigation measure proposed to address Hazards and Hazardous Waste impacts. Mitigation Measure HAZ-1 only commits to a management plan and is quoted in its entirety below:

MidPen will prepare a Site Management Plan for the project site prior to submitting an application for a Coastal Development Permit for the proposed project, and will comply with all requirements and implement all BMPs contained in the plan during construction of the project.

Because of the lead contamination, the Phase I, the Phase II and the additional investigation should be submitted for regulatory review, to the San Mateo County Environmental Health Services, to the San

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<sup>1</sup> [https://www.waterboards.ca.gov/sanfranciscobay/water\\_issues/programs/esl.html](https://www.waterboards.ca.gov/sanfranciscobay/water_issues/programs/esl.html) (Table “Tier 1 ESLs”)



Francisco Bay RWQCB, and to DTSC. A formal voluntary oversight agreement is recommended with the RWQCB to certify the reliability of the data for decision making and to ensure the protection of public health. Any determination by the regulatory agencies about the need for further action, to include sampling or soil excavation and off-site disposal, should be included in an EIR.

## Hydrology and Water Quality

The Project site is located approximately 750 feet from the coastline. A perennial stream (Montara Creek), located approximately 50 to 250 feet to the northeast of the project site, runs in parallel to the northern border of the site (prior to emptying into the Pacific Ocean).

The PEIR states (p. 18):

Potential impacts to groundwater and surface water quality could occur both during construction and operation of the proposed project. Temporary increases in the erosion of exposed soils during construction of the project could result in minor on-or-off-site water quality impacts, particularly if rainfall events occur during an active construction phase.

The PEIR further states (p. 18):

On-site soils are subject to severe water erosion hazards (NRCS 2018).

What the PEIR fails to disclose is that onsite soils are contaminated with lead at concentrations greater than the RWQCB ESL 32 mg/kg for the protection of terrestrial habitat.<sup>2</sup> The PEIR makes no specific provisions in Mitigation Measure GEO-2 for the protection of terrestrial habitat in the adjacent Montara Creek from the erosion of lead-contaminated soils upon soil disturbance during the Project's construction period or from any residual soil contamination that would be left in place after the mixing of site soils, as planned.

Note that the statistical analysis that was performed in the Additional Subsurface Investigation & Water Well Evaluation found the upper 95<sup>th</sup> percentile confidence limit for lead in soil to be 42 mg/kg. This value exceeds the ESL of 32 mg/kg for the protection of terrestrial habitat.

Best management practices (BMPs) that are specific to known lead contamination at concentrations above the terrestrial habitat protection ESL need to be implemented during the project construction period. The reference in the PEIR to compliance with the State Water Resources Control Board Construction General permit is insufficient mitigation without consideration of the lead contamination and specific BMPs that would be taken to control lead in stormwater runoff. An EIR should be prepared to disclose lead contamination in the context of Hydrology and Water Quality impacts, along with effective mitigation measures and BMPs to control lead-contaminated soils from erosion and transportation to the adjacent Montara Creek.

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<sup>2</sup> [https://www.waterboards.ca.gov/sanfranciscobay/water\\_issues/programs/esl.html](https://www.waterboards.ca.gov/sanfranciscobay/water_issues/programs/esl.html) (Table "Summary of Soil ESLs")

Sincerely,

A handwritten signature in blue ink, appearing to read "M Hagemann", with a long horizontal flourish extending to the right.

Matt Hagemann, P.G., C.Hg.

Attachment A: CV, Matt Hagemann





Technical Consultation, Data Analysis and  
Litigation Support for the Environment

2656 29<sup>th</sup> Street, Suite 201  
Santa Monica, CA 90405

Matt Hagemann, P.G., C.Hg.  
(949) 887-9013  
[mhagemann@swape.com](mailto:mhagemann@swape.com)

**Matthew F. Hagemann, P.G., C.Hg., QSD, QSP**

**Geologic and Hydrogeologic Characterization  
Investigation and Remediation Strategies  
Litigation Support and Testifying Expert  
Industrial Stormwater Compliance  
CEQA Review**

**Education:**

M.S. Degree, Geology, California State University Los Angeles, Los Angeles, CA, 1984.

B.A. Degree, Geology, Humboldt State University, Arcata, CA, 1982.

**Professional Certifications:**

California Professional Geologist

California Certified Hydrogeologist

Qualified SWPPP Developer and Practitioner

**Professional Experience:**

Matt has 30 years of experience in environmental policy, contaminant assessment and remediation, stormwater compliance, and CEQA review. He spent nine years with the U.S. EPA in the RCRA and Superfund programs and served as EPA's Senior Science Policy Advisor in the Western Regional Office where he identified emerging threats to groundwater from perchlorate and MTBE. While with EPA, Matt also served as a Senior Hydrogeologist in the oversight of the assessment of seven major military facilities undergoing base closure. He led numerous enforcement actions under provisions of the Resource Conservation and Recovery Act (RCRA) and directed efforts to improve hydrogeologic characterization and water quality monitoring. For the past 15 years, as a founding partner with SWAPE, Matt has developed extensive client relationships and has managed complex projects that include consultation as an expert witness and a regulatory specialist, and a manager of projects ranging from industrial stormwater compliance to CEQA review of impacts from hazardous waste, air quality and greenhouse gas emissions.

Positions Matt has held include:

- Founding Partner, Soil/Water/Air Protection Enterprise (SWAPE) (2003 – present);
- Geology Instructor, Golden West College, 2010 – 2014, 2017;
- Senior Environmental Analyst, Komex H<sub>2</sub>O Science, Inc. (2000 -- 2003);

- Executive Director, Orange Coast Watch (2001 – 2004);
- Senior Science Policy Advisor and Hydrogeologist, U.S. Environmental Protection Agency (1989–1998);
- Hydrogeologist, National Park Service, Water Resources Division (1998 – 2000);
- Adjunct Faculty Member, San Francisco State University, Department of Geosciences (1993 – 1998);
- Instructor, College of Marin, Department of Science (1990 – 1995);
- Geologist, U.S. Forest Service (1986 – 1998); and
- Geologist, Dames & Moore (1984 – 1986).

**Senior Regulatory and Litigation Support Analyst:**

With SWAPE, Matt’s responsibilities have included:

- Lead analyst and testifying expert in the review of over 300 environmental impact reports and negative declarations since 2003 under CEQA that identify significant issues with regard to hazardous waste, water resources, water quality, air quality, greenhouse gas emissions, and geologic hazards. Make recommendations for additional mitigation measures to lead agencies at the local and county level to include additional characterization of health risks and implementation of protective measures to reduce worker exposure to hazards from toxins and Valley Fever.
- Stormwater analysis, sampling and best management practice evaluation at more than 150 industrial facilities.
- Expert witness on numerous cases including, for example, perfluorooctanoic acid (PFOA) contamination of groundwater, MTBE litigation, air toxins at hazards at a school, CERCLA compliance in assessment and remediation, and industrial stormwater contamination.
- Technical assistance and litigation support for vapor intrusion concerns.
- Lead analyst and testifying expert in the review of environmental issues in license applications for large solar power plants before the California Energy Commission.
- Manager of a project to evaluate numerous formerly used military sites in the western U.S.
- Manager of a comprehensive evaluation of potential sources of perchlorate contamination in Southern California drinking water wells.
- Manager and designated expert for litigation support under provisions of Proposition 65 in the review of releases of gasoline to sources drinking water at major refineries and hundreds of gas stations throughout California.

With Komex H2O Science Inc., Matt’s duties included the following:

- Senior author of a report on the extent of perchlorate contamination that was used in testimony by the former U.S. EPA Administrator and General Counsel.
- Senior researcher in the development of a comprehensive, electronically interactive chronology of MTBE use, research, and regulation.
- Senior researcher in the development of a comprehensive, electronically interactive chronology of perchlorate use, research, and regulation.
- Senior researcher in a study that estimates nationwide costs for MTBE remediation and drinking water treatment, results of which were published in newspapers nationwide and in testimony against provisions of an energy bill that would limit liability for oil companies.
- Research to support litigation to restore drinking water supplies that have been contaminated by MTBE in California and New York.

- Expert witness testimony in a case of oil production-related contamination in Mississippi.
- Lead author for a multi-volume remedial investigation report for an operating school in Los Angeles that met strict regulatory requirements and rigorous deadlines.
- Development of strategic approaches for cleanup of contaminated sites in consultation with clients and regulators.

#### **Executive Director:**

As Executive Director with Orange Coast Watch, Matt led efforts to restore water quality at Orange County beaches from multiple sources of contamination including urban runoff and the discharge of wastewater. In reporting to a Board of Directors that included representatives from leading Orange County universities and businesses, Matt prepared issue papers in the areas of treatment and disinfection of wastewater and control of the discharge of grease to sewer systems. Matt actively participated in the development of countywide water quality permits for the control of urban runoff and permits for the discharge of wastewater. Matt worked with other nonprofits to protect and restore water quality, including Surfrider, Natural Resources Defense Council and Orange County CoastKeeper as well as with business institutions including the Orange County Business Council.

#### **Hydrogeology:**

As a Senior Hydrogeologist with the U.S. Environmental Protection Agency, Matt led investigations to characterize and cleanup closing military bases, including Mare Island Naval Shipyard, Hunters Point Naval Shipyard, Treasure Island Naval Station, Alameda Naval Station, Moffett Field, Mather Army Airfield, and Sacramento Army Depot. Specific activities were as follows:

- Led efforts to model groundwater flow and contaminant transport, ensured adequacy of monitoring networks, and assessed cleanup alternatives for contaminated sediment, soil, and groundwater.
- Initiated a regional program for evaluation of groundwater sampling practices and laboratory analysis at military bases.
- Identified emerging issues, wrote technical guidance, and assisted in policy and regulation development through work on four national U.S. EPA workgroups, including the Superfund Groundwater Technical Forum and the Federal Facilities Forum.

At the request of the State of Hawaii, Matt developed a methodology to determine the vulnerability of groundwater to contamination on the islands of Maui and Oahu. He used analytical models and a GIS to show zones of vulnerability, and the results were adopted and published by the State of Hawaii and County of Maui.

As a hydrogeologist with the EPA Groundwater Protection Section, Matt worked with provisions of the Safe Drinking Water Act and NEPA to prevent drinking water contamination. Specific activities included the following:

- Received an EPA Bronze Medal for his contribution to the development of national guidance for the protection of drinking water.
- Managed the Sole Source Aquifer Program and protected the drinking water of two communities through designation under the Safe Drinking Water Act. He prepared geologic reports, conducted



public hearings, and responded to public comments from residents who were very concerned about the impact of designation.

- Reviewed a number of Environmental Impact Statements for planned major developments, including large hazardous and solid waste disposal facilities, mine reclamation, and water transfer.

Matt served as a hydrogeologist with the RCRA Hazardous Waste program. Duties were as follows:

- Supervised the hydrogeologic investigation of hazardous waste sites to determine compliance with Subtitle C requirements.
- Reviewed and wrote "part B" permits for the disposal of hazardous waste.
- Conducted RCRA Corrective Action investigations of waste sites and led inspections that formed the basis for significant enforcement actions that were developed in close coordination with U.S. EPA legal counsel.
- Wrote contract specifications and supervised contractor's investigations of waste sites.

With the National Park Service, Matt directed service-wide investigations of contaminant sources to prevent degradation of water quality, including the following tasks:

- Applied pertinent laws and regulations including CERCLA, RCRA, NEPA, NRDA, and the Clean Water Act to control military, mining, and landfill contaminants.
- Conducted watershed-scale investigations of contaminants at parks, including Yellowstone and Olympic National Park.
- Identified high-levels of perchlorate in soil adjacent to a national park in New Mexico and advised park superintendent on appropriate response actions under CERCLA.
- Served as a Park Service representative on the Interagency Perchlorate Steering Committee, a national workgroup.
- Developed a program to conduct environmental compliance audits of all National Parks while serving on a national workgroup.
- Co-authored two papers on the potential for water contamination from the operation of personal watercraft and snowmobiles, these papers serving as the basis for the development of nation-wide policy on the use of these vehicles in National Parks.
- Contributed to the Federal Multi-Agency Source Water Agreement under the Clean Water Action Plan.

### **Policy:**

Served senior management as the Senior Science Policy Advisor with the U.S. Environmental Protection Agency, Region 9.

Activities included the following:

- Advised the Regional Administrator and senior management on emerging issues such as the potential for the gasoline additive MTBE and ammonium perchlorate to contaminate drinking water supplies.
- Shaped EPA's national response to these threats by serving on workgroups and by contributing to guidance, including the Office of Research and Development publication, *Oxygenates in Water: Critical Information and Research Needs*.
- Improved the technical training of EPA's scientific and engineering staff.
- Earned an EPA Bronze Medal for representing the region's 300 scientists and engineers in negotiations with the Administrator and senior management to better integrate scientific

principles into the policy-making process.

- Established national protocol for the peer review of scientific documents.

### **Geology:**

With the U.S. Forest Service, Matt led investigations to determine hillslope stability of areas proposed for timber harvest in the central Oregon Coast Range. Specific activities were as follows:

- Mapped geology in the field, and used aerial photographic interpretation and mathematical models to determine slope stability.
- Coordinated his research with community members who were concerned with natural resource protection.
- Characterized the geology of an aquifer that serves as the sole source of drinking water for the city of Medford, Oregon.

As a consultant with Dames and Moore, Matt led geologic investigations of two contaminated sites (later listed on the Superfund NPL) in the Portland, Oregon, area and a large hazardous waste site in eastern Oregon. Duties included the following:

- Supervised year-long effort for soil and groundwater sampling.
- Conducted aquifer tests.
- Investigated active faults beneath sites proposed for hazardous waste disposal.

### **Teaching:**

From 1990 to 1998, Matt taught at least one course per semester at the community college and university levels:

- At San Francisco State University, held an adjunct faculty position and taught courses in environmental geology, oceanography (lab and lecture), hydrogeology, and groundwater contamination.
- Served as a committee member for graduate and undergraduate students.
- Taught courses in environmental geology and oceanography at the College of Marin.

Matt is currently a part time geology instructor at Golden West College in Huntington Beach, California where he taught from 2010 to 2014 and in 2017.

### **Invited Testimony, Reports, Papers and Presentations:**

**Hagemann, M.F.**, 2008. Disclosure of Hazardous Waste Issues under CEQA. Presentation to the Public Environmental Law Conference, Eugene, Oregon.

**Hagemann, M.F.**, 2008. Disclosure of Hazardous Waste Issues under CEQA. Invited presentation to U.S. EPA Region 9, San Francisco, California.

**Hagemann, M.F.**, 2005. Use of Electronic Databases in Environmental Regulation, Policy Making and Public Participation. Brownfields 2005, Denver, Colorado.

**Hagemann, M.F.**, 2004. Perchlorate Contamination of the Colorado River and Impacts to Drinking Water in Nevada and the Southwestern U.S. Presentation to a meeting of the American Groundwater Trust, Las Vegas, NV (served on conference organizing committee).

**Hagemann, M.F.**, 2004. Invited testimony to a California Senate committee hearing on air toxins at schools in Southern California, Los Angeles.

Brown, A., Farrow, J., Gray, A. and **Hagemann, M.**, 2004. An Estimate of Costs to Address MTBE Releases from Underground Storage Tanks and the Resulting Impact to Drinking Water Wells. Presentation to the Ground Water and Environmental Law Conference, National Groundwater Association.

**Hagemann, M.F.**, 2004. Perchlorate Contamination of the Colorado River and Impacts to Drinking Water in Arizona and the Southwestern U.S. Presentation to a meeting of the American Groundwater Trust, Phoenix, AZ (served on conference organizing committee).

**Hagemann, M.F.**, 2003. Perchlorate Contamination of the Colorado River and Impacts to Drinking Water in the Southwestern U.S. Invited presentation to a special committee meeting of the National Academy of Sciences, Irvine, CA.

**Hagemann, M.F.**, 2003. Perchlorate Contamination of the Colorado River. Invited presentation to a tribal EPA meeting, Pechanga, CA.

**Hagemann, M.F.**, 2003. Perchlorate Contamination of the Colorado River. Invited presentation to a meeting of tribal representatives, Parker, AZ.

**Hagemann, M.F.**, 2003. Impact of Perchlorate on the Colorado River and Associated Drinking Water Supplies. Invited presentation to the Inter-Tribal Meeting, Torres Martinez Tribe.

**Hagemann, M.F.**, 2003. The Emergence of Perchlorate as a Widespread Drinking Water Contaminant. Invited presentation to the U.S. EPA Region 9.

**Hagemann, M.F.**, 2003. A Deductive Approach to the Assessment of Perchlorate Contamination. Invited presentation to the California Assembly Natural Resources Committee.

**Hagemann, M.F.**, 2003. Perchlorate: A Cold War Legacy in Drinking Water. Presentation to a meeting of the National Groundwater Association.

**Hagemann, M.F.**, 2002. From Tank to Tap: A Chronology of MTBE in Groundwater. Presentation to a meeting of the National Groundwater Association.

**Hagemann, M.F.**, 2002. A Chronology of MTBE in Groundwater and an Estimate of Costs to Address Impacts to Groundwater. Presentation to the annual meeting of the Society of Environmental Journalists.

**Hagemann, M.F.**, 2002. An Estimate of the Cost to Address MTBE Contamination in Groundwater (and Who Will Pay). Presentation to a meeting of the National Groundwater Association.

**Hagemann, M.F.**, 2002. An Estimate of Costs to Address MTBE Releases from Underground Storage Tanks and the Resulting Impact to Drinking Water Wells. Presentation to a meeting of the U.S. EPA and State Underground Storage Tank Program managers.



**Hagemann, M.F.**, 2001. From Tank to Tap: A Chronology of MTBE in Groundwater. Unpublished report.

**Hagemann, M.F.**, 2001. Estimated Cleanup Cost for MTBE in Groundwater Used as Drinking Water. Unpublished report.

**Hagemann, M.F.**, 2001. Estimated Costs to Address MTBE Releases from Leaking Underground Storage Tanks. Unpublished report.

**Hagemann, M.F.**, and VanMouwerik, M., 1999. Potential Water Quality Concerns Related to Snowmobile Usage. Water Resources Division, National Park Service, Technical Report.

VanMouwerik, M. and **Hagemann, M.F.** 1999, Water Quality Concerns Related to Personal Watercraft Usage. Water Resources Division, National Park Service, Technical Report.

**Hagemann, M.F.**, 1999, Is Dilution the Solution to Pollution in National Parks? The George Wright Society Biannual Meeting, Asheville, North Carolina.

**Hagemann, M.F.**, 1997, The Potential for MTBE to Contaminate Groundwater. U.S. EPA Superfund Groundwater Technical Forum Annual Meeting, Las Vegas, Nevada.

**Hagemann, M.F.**, and Gill, M., 1996, Impediments to Intrinsic Remediation, Moffett Field Naval Air Station, Conference on Intrinsic Remediation of Chlorinated Hydrocarbons, Salt Lake City.

**Hagemann, M.F.**, Fukunaga, G.L., 1996, The Vulnerability of Groundwater to Anthropogenic Contaminants on the Island of Maui, Hawaii. Hawaii Water Works Association Annual Meeting, Maui, October 1996.

**Hagemann, M. F.**, Fukunaga, G. L., 1996, Ranking Groundwater Vulnerability in Central Oahu, Hawaii. Proceedings, Geographic Information Systems in Environmental Resources Management, Air and Waste Management Association Publication VIP-61.

**Hagemann, M.F.**, 1994. Groundwater Characterization and Cleanup at Closing Military Bases in California. Proceedings, California Groundwater Resources Association Meeting.

**Hagemann, M.F.** and Sabol, M.A., 1993. Role of the U.S. EPA in the High Plains States Groundwater Recharge Demonstration Program. Proceedings, Sixth Biennial Symposium on the Artificial Recharge of Groundwater.

**Hagemann, M.F.**, 1993. U.S. EPA Policy on the Technical Impracticability of the Cleanup of DNAPL-contaminated Groundwater. California Groundwater Resources Association Meeting.

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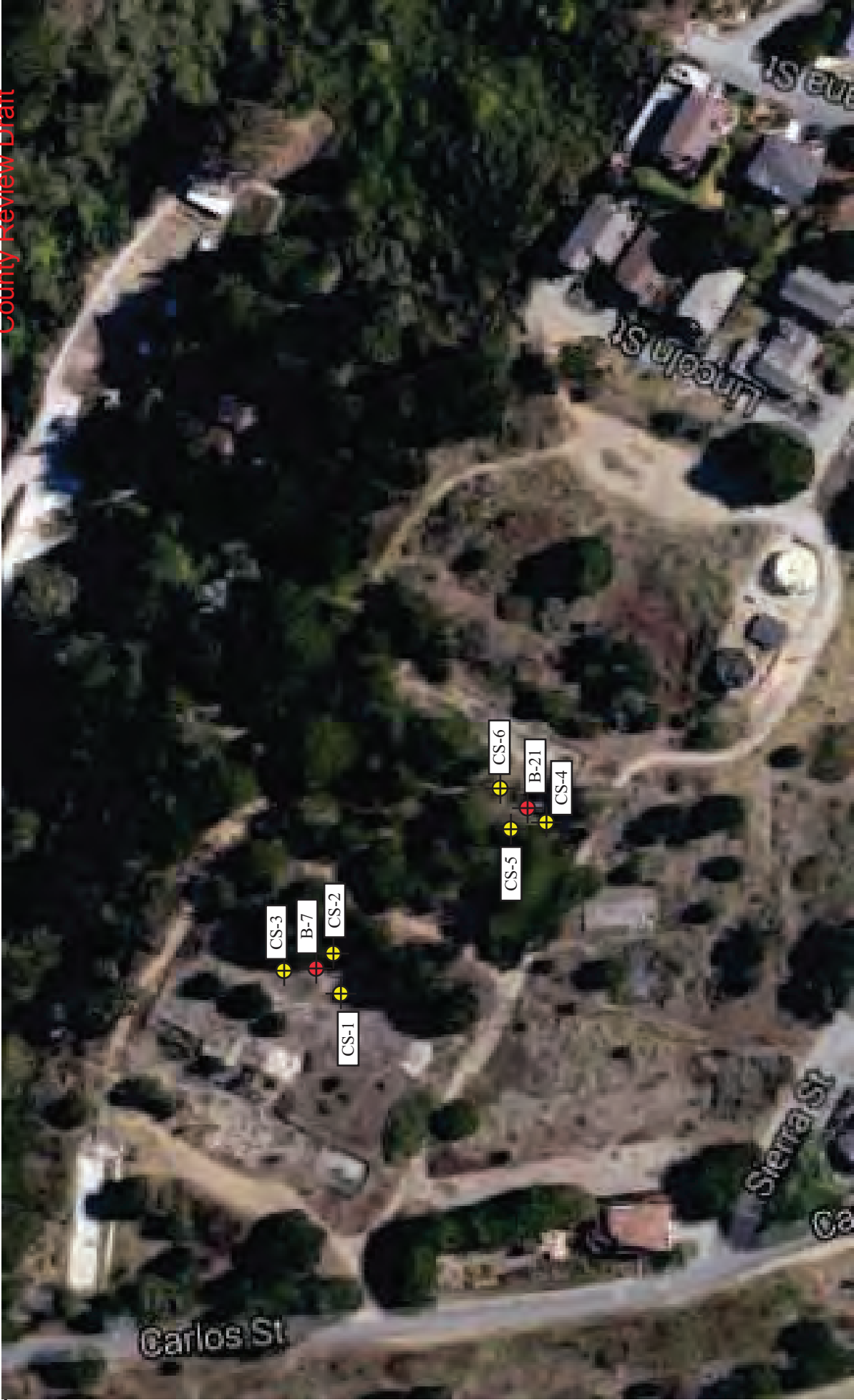
**Hagemann, M.F.**, 1992. Dense Nonaqueous Phase Liquid Contamination of Groundwater: An Ounce of Prevention... Proceedings, Association of Engineering Geologists Annual Meeting, v. 35.

**Other Experience:**

Selected as subject matter expert for the California Professional Geologist licensing examinations, 2009-2011.

Attachment B: Additional Subsurface Investigation & Water Well Evaluation – Figure 2





**LEGEND**

- Soil Boring (AEI, 2017)
- Exploratory Boring (AEI, 2015)

0 50 100  
APPROXIMATE SCALE (Feet)



**AEI CONSULTANTS**

3880 S. BASCOM AVENUE, SAN JOSE, CALIFORNIA

**CONFIRMATION BORING LOCATIONS**

Carlos Street at Sierra Street  
Moss Beach, California

**FIGURE 2**

Project No. 350248

## Attachment C: Environmental Screening Level Tables

## Tier 1 ESLs<sup>1</sup>

2019 (Rev. 2)

Based on a generic conceptual site model designed for use at most sites<sup>2</sup>

Chemicals	CAS No.	Groundwater (µg/L)	Soil (mg/kg)	Subslab / Soil Gas (µg/m <sup>3</sup> )	Indoor Air (µg/m <sup>3</sup> )
1,2-Dichloropropane	78-87-5	2.3E+00	6.5E-02	9.4E+00	2.8E-01
1,3-Dichloropropene	542-75-6	5.0E-01	1.7E-02	5.8E+00	1.8E-01
Dieldrin	60-57-1	1.4E-04	4.6E-04	2.0E-02	6.1E-04
Diethyl phthalate	84-66-2	1.5E+00	2.5E-02	--	--
Dimethyl phthalate	131-11-3	1.5E+00	3.5E-02	--	--
2,4-Dimethylphenol	105-67-9	1.0E+02	8.1E+00	3.3E+01	1.0E+00
2,4-Dinitrophenol	51-28-5	3.9E+01	3.0E+00	--	--
2,4-Dinitrotoluene	121-14-2	2.4E-01	2.3E-02	--	--
1,4-Dioxane	123-91-1	3.8E-01	1.7E-04	1.2E+01	3.6E-01
Dioxin (2,3,7,8-TCDD)	1746-01-6	1.4E-08	4.8E-06	2.5E-06	7.4E-08
Endosulfan	115-29-7	8.7E-03	9.8E-03	--	--
Endrin	72-20-8	2.3E-03	1.1E-03	--	--
Ethylbenzene	100-41-4	3.5E+00	4.3E-01	3.7E+01	1.1E+00
Fluoranthene [PAH]	206-44-0	8.0E+00	6.9E-01	--	--
Fluorene [PAH]	86-73-7	3.9E+00	6.0E+00	--	--
Heptachlor	76-44-8	2.1E-04	1.2E-01	7.2E-02	2.2E-03
Heptachlor epoxide	1024-57-3	1.1E-04	1.8E-04	3.6E-02	1.1E-03
Hexachlorobenzene	118-74-1	7.7E-04	8.0E-04	1.8E-01	5.5E-03
Hexachlorobutadiene	87-68-3	1.4E-01	2.8E-02	4.3E+00	1.3E-01
g-Hexachlorocyclohexane (Lindane)	58-89-9	1.6E-02	7.4E-03	--	--
Hexachloroethane	67-72-1	3.3E-01	1.9E-02	8.5E+00	2.6E-01
Indeno[1,2,3-c,d]pyrene [PAH]	193-39-5	4.9E-02	4.8E-01	--	--
Lead	7439-92-1	2.5E+00	3.2E+01	--	--
Mercury (elemental)	7439-97-6	2.5E-02	1.3E+01	1.0E+00	3.1E-02
Methoxychlor	72-43-5	3.0E-03	1.3E-02	--	--
Methylene chloride	75-09-2	5.0E+00	1.2E-01	3.4E+01	1.0E+00
Methyl ethyl ketone	78-93-3	5.6E+03	6.1E+00	1.7E+05	5.2E+03
Methyl isobutyl ketone	108-10-1	1.2E+02	3.6E-01	1.4E+04	4.2E+02
Methyl mercury	22967-92-6	3.0E-03	3.4E-02	--	--
2-Methylnaphthalene	91-57-6	2.1E+00	8.8E-01	2.3E+03	6.8E+01
Methyl tertiary butyl ether (MTBE)	1634-04-4	5.0E+00	2.8E-02	3.6E+02	1.1E+01
Molybdenum	7439-98-7	1.0E+02	6.9E+00	--	--
Naphthalene [PAH]	91-20-3	1.7E-01	4.2E-02	2.8E+00	8.3E-02
Nickel	7440-02-0	8.2E+00	8.6E+01	--	--
Pentachlorophenol	87-86-5	1.0E+00	1.3E-02	--	--
Perchlorate	7790-98-9	6.0E+00	5.5E+01	--	--
Petroleum - Gasoline	--	1.0E+02	1.0E+02	3.3E+03	1.0E+02
Petroleum - Stoddard Solvent	--	1.0E+02	1.0E+02	1.1E+04	3.3E+02
Petroleum - Jet Fuel	--	1.0E+02	1.0E+02	1.1E+04	3.3E+02
Petroleum - Diesel	--	1.0E+02	2.6E+02	8.9E+03	2.7E+02
Petroleum - HOPs	--	1.0E+02	--	--	--
Petroleum - Motor Oil	--	--	1.6E+03	--	--
Phenanthrene [PAH]	85-01-8	4.6E+00	7.8E+00	1.8E+03	5.5E+01
Phenol	108-95-2	5.0E+00	1.6E-01	5.2E+03	1.6E+02
Polychlorinated biphenyls (PCBs)	1336-36-3	1.7E-04	2.3E-01	1.6E-01	4.9E-03
Pyrene [PAH]	129-00-0	2.0E+00	4.5E+01	--	--
Selenium	7782-49-2	5.0E-01	2.4E+00	--	--
Silver	7440-22-4	1.9E-01	2.5E+01	--	--
Styrene	100-42-5	1.0E+01	9.2E-01	3.1E+04	9.4E+02
tert-Butyl alcohol	75-65-0	1.2E+01	7.5E-02	--	--
1,1,1,2-Tetrachloroethane	630-20-6	5.7E-01	1.7E-02	1.3E+01	3.8E-01
1,1,2,2-Tetrachloroethane	79-34-5	1.0E+00	1.8E-02	1.6E+00	4.8E-02
Tetrachloroethene	127-18-4	6.4E-01	8.0E-02	1.5E+01	4.6E-01
Thallium	7440-28-0	2.0E+00	7.8E-01	--	--
Toluene	108-88-3	4.0E+01	3.2E+00	1.0E+04	3.1E+02
Toxaphene	8001-35-2	2.0E-04	5.1E-01	--	--
1,2,4-Trichlorobenzene	120-82-1	5.0E+00	1.2E+00	7.0E+01	2.1E+00





# Environmental Screening Levels

San Francisco Bay Regional Water Quality Control Board



GAVIN NEWSOM  
GOVERNOR



JARED BLUMENFELD  
SECRETARY FOR  
ENVIRONMENTAL PROTECTION

## Tier 1 ESLs<sup>1</sup>

2019 (Rev. 2)

Based on a generic conceptual site model designed for use at most sites<sup>2</sup>

Chemicals	CAS No.	Groundwater (µg/L)	Soil (mg/kg)	Subslab / Soil Gas (µg/m <sup>3</sup> )	Indoor Air (µg/m <sup>3</sup> )
1,1,1-Trichloroethane	71-55-6	6.2E+01	7.0E+00	3.5E+04	1.0E+03
1,1,2-Trichloroethane	79-00-5	5.0E+00	7.6E-02	5.8E+00	1.8E-01
Trichloroethene	79-01-6	1.2E+00	8.5E-02	1.6E+01	4.8E-01
2,4,5-Trichlorophenol	95-95-4	1.1E+01	2.9E+00	--	--
2,4,6-Trichlorophenol	88-06-2	6.3E-01	4.0E-02	1.0E+01	3.0E-01
1,2,3-Trichloropropane	96-18-4	5.0E-03	1.1E-04	1.0E+01	3.1E-01
Vanadium	7440-62-2	1.9E+01	1.8E+01	--	--
Vinyl chloride	75-01-4	8.6E-03	1.5E-03	3.2E-01	9.5E-03
Xylenes	1330-20-7	2.0E+01	2.1E+00	3.5E+03	1.0E+02
Zinc	7440-66-6	8.1E+01	3.4E+02	--	--

### Notes:

1 - ESLs are developed based on methodologies discussed in the User's Guide. Evaluation of laboratory detection limits and naturally occurring background or ambient concentrations should be independently conducted. See User's Guide Chapter 12 (Additional Considerations) for further information.

2 - Generic Conceptual Site Model - See User's Guide Chapter 2. Input settings are:

Land Use = Residential  
Groundwater Use = Drinking Water Resource  
MCL Priority over Risk-Based Levels = Yes  
Discharge to Surface Water = Saltwater & Freshwater  
Vegetation Level = Substantial  
Soil Exposure Depth = Shallow

### Abbreviations:

DDD - Dichlorodiphenyldichloroethane

DDE - Dichlorodiphenyldichloroethene

DDT - Dichlorodiphenyltrichloroethane

HOPs - Hydrocarbon Oxidation Products (biodegradation metabolites and photo-oxidation products of petroleum hydrocarbons). See User's Guide Chapter 4 for further information.

PAH - Polycyclic aromatic hydrocarbon

TCDD - Tetrachlorodibenzodioxin

2019 (Rev. 2)

Summary of Groundwater ESLs (µg/L)

Chemicals	CAS No.	Direct Exposure Human Health Risk Levels (Table GW-1)				Aquatic Habitat Goal Levels (Table GW-2)				Groundwater Vapor Intrusion Human Health Risk Levels (Table GW-3)				Gross Contamination Levels (GW-4)		Odor Nuisance Levels (Table GW-5)		GW Tier 1 ESL	Basis
		Human Health Risk Levels (Table GW-1)		Tapwater Non-cancer Hazard	Seafood Ingestion Human Health	Saltwater Ecotox	Fresh Water Ecotox	Tapwater Cancer Risk	Non-cancer Hazard	Cancer Risk	Non-cancer Hazard	Cancer Risk	Non-cancer Hazard	Cancer Risk	Non-cancer Hazard	Drinking Water	Non-Drinking Water		
		MCL Priority <sup>1</sup>	Tapwater Cancer Risk																
Heptachlor	76-44-8	1.0E-02	1.4E-03	1.3E+00	2.1E-04	3.6E-03	3.8E-03	1.8E-01	--	7.9E-01	--	9.0E+01	2.0E+01	2.0E+02	2.1E-04	Aquatic Habitat			
Heptachlor epoxide	1024-57-3	1.0E-02	1.4E-03	1.2E-01	1.1E-04	3.6E-03	3.8E-03	1.3E+00	--	5.5E+00	--	1.0E+02	--	--	1.1E-04	Aquatic Habitat			
Hexachlorobenzene	118-74-1	1.0E+00	8.8E-03	1.6E+01	7.7E-04	6.5E+01	3.7E+00	7.9E-02	--	3.4E-01	--	3.1E+00	3.0E+03	3.0E+04	7.7E-04	Aquatic Habitat			
Hexachlorobutadiene	87-68-3	1.4E-01	1.4E-01	6.5E+00	5.0E+01	3.2E+00	4.7E+00	3.0E-01	--	1.3E+00	--	1.6E+03	6.0E+00	6.0E+01	1.4E-01	Tap Canc-Risk			
g-Hexachlorocyclohexane (Lindane)	58-89-9	2.0E-01	3.2E-02	3.6E+00	6.3E-02	1.6E-02	8.0E-02	--	--	--	--	3.7E+03	1.2E+04	1.2E+05	1.6E-02	Aquatic Habitat			
Hexachloroethane	67-72-1	3.3E-01	3.3E-01	6.2E+00	8.9E+00	9.4E+01	1.2E+01	1.6E+00	2.0E+02	7.0E+00	8.2E+02	2.5E+04	1.0E+01	1.0E+02	3.3E-01	Tap Canc-Risk			
Indeno[1,2,3-c,d]pyrene [PAH]	193-39-5	2.5E-01	2.5E-01	--	4.9E-02	1.5E+01	--	--	--	--	--	9.5E-02	--	--	4.9E-02	Aquatic Habitat			
Lead	7439-92-1	1.5E+01	9.2E+00	2.0E-01	--	8.1E+00	2.5E+00	--	--	--	--	5.0E+04	--	--	2.5E+00	Aquatic Habitat			
Mercury (elemental)	7439-97-6	2.0E+00	--	6.1E-02	5.1E-02	2.5E-02	2.5E-02	--	8.9E-02	--	3.8E-01	3.0E+01	--	--	2.5E-02	Aquatic Habitat			
Methoxychlor	72-43-5	3.0E+01	--	9.0E-02	--	3.0E-03	1.9E-02	--	--	--	--	5.0E+01	4.7E+03	4.7E+04	3.0E-03	Aquatic Habitat			
Methylene chloride	75-09-2	5.0E+00	9.3E-01	1.0E+02	1.6E+03	3.2E+03	2.2E+03	7.8E+00	3.2E+03	9.4E+01	1.3E+04	5.0E+04	9.1E+03	9.1E+04	5.0E+00	MCL			
Methyl ethyl ketone	78-93-3	5.6E+03	--	5.6E+03	--	--	1.4E+04	--	2.3E+06	--	--	9.5E+06	5.0E+04	8.4E+04	5.6E+03	Tap NC-Hazard			
Methyl isobutyl ketone	108-10-1	1.2E+02	--	1.2E+02	--	--	1.7E+02	--	5.6E+05	--	--	2.3E+06	5.0E+04	1.3E+04	1.2E+02	Tap NC-Hazard			
Methyl mercury	22967-92-6	2.0E+00	--	2.0E+00	--	--	3.0E-03	--	--	--	--	5.0E+04	--	--	3.0E-03	Aquatic Habitat			
2-Methylnaphthalene	91-57-6	3.6E+01	--	3.6E+01	--	3.0E+01	2.1E+00	--	--	--	--	1.3E+04	1.0E+01	1.0E+02	2.1E+00	Aquatic Habitat			
Methyl tertiary butyl ether (MTBE)	1634-04-4	5.0E+00	1.3E+01	6.3E+03	--	8.0E+03	6.6E+04	4.5E+02	1.3E+05	2.0E+03	5.5E+05	5.0E+04	5.0E+00	1.8E+03	5.0E+00	Odor/Nuis			
Molybdenum	7439-98-7	1.0E+02	--	1.0E+02	--	--	2.4E+02	--	--	--	--	5.0E+04	--	--	1.0E+02	Tap NC-Hazard			
Naphthalene [PAH]	91-20-3	1.7E-01	1.7E-01	6.1E+00	--	1.5E+01	2.4E+01	4.6E+00	1.7E+02	2.0E+01	7.3E+02	1.6E+04	2.1E+01	2.1E+02	1.7E-01	Tap Canc-Risk			
Nickel	7440-02-0	1.0E+02	1.2E+01	2.2E+02	4.6E+03	8.2E+00	5.2E+01	--	--	--	--	5.0E+04	--	--	8.2E+00	Aquatic Habitat			
Pentachlorophenol	87-86-5	1.0E+00	4.0E-02	2.3E+01	8.2E+00	7.9E+00	1.5E+01	--	--	--	--	7.0E+03	3.0E+01	5.9E+03	1.0E+00	MCL			
Perchlorate	7790-98-9	6.0E+00	--	1.0E+00	--	--	6.0E+02	--	--	--	--	5.0E+04	--	--	6.0E+00	MCL			
Petroleum - Gasoline	--	7.6E+02	--	7.6E+02	--	3.7E+03	4.4E+02	--	--	--	--	5.0E+04	1.0E+02	5.0E+03	1.0E+02	Odor/Nuis			
Petroleum - Stoddard Solvent	--	2.1E+02	--	2.1E+02	--	6.4E+02	6.4E+02	--	--	--	--	2.5E+03	1.0E+02	5.0E+03	1.0E+02	Odor/Nuis			
Petroleum - Jet Fuel	--	2.1E+02	--	2.1E+02	--	6.4E+02	6.4E+02	--	--	--	--	2.5E+03	1.0E+02	5.0E+03	1.0E+02	Odor/Nuis			
Petroleum - Diesel	--	2.0E+02	--	2.0E+02	--	6.4E+02	6.4E+02	--	--	--	--	2.5E+03	1.0E+02	5.0E+03	1.0E+02	Odor/Nuis			
Petroleum - HOPs	--	4.1E+02	--	4.1E+02	--	5.1E+02	5.1E+02	--	--	--	--	5.0E+04	1.0E+02	5.0E+03	1.0E+02	Odor/Nuis			
Petroleum - Motor Oil	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--			
Phenanthrene [PAH]	85-01-8	--	--	--	--	4.6E+00	6.3E+00	--	--	--	--	4.1E+02	1.0E+03	1.0E+04	4.6E+00	Aquatic Habitat			
Phenol	108-95-2	4.2E+03	--	4.2E+03	4.6E+06	5.8E+02	1.3E+03	--	--	--	--	5.0E+04	5.0E+00	7.9E+04	5.0E+00	Odor/Nuis			
Polychlorinated biphenyls (PCBs)	1336-36-3	5.0E-01	1.9E-03	--	1.7E-04	3.0E-02	1.4E-02	2.9E-01	--	1.3E+00	--	3.5E+02	--	--	1.7E-04	Aquatic Habitat			
Pyrene [PAH]	129-00-0	1.2E+02	--	1.2E+02	1.1E+04	1.5E+01	2.0E+00	--	--	--	--	7.0E+01	--	--	2.0E+00	Aquatic Habitat			
Selenium	7782-49-2	5.0E+01	--	3.0E+01	--	5.0E+00	5.0E+00	--	--	--	--	5.0E+04	--	--	5.0E-01	Aquatic Habitat			
Silver	7440-22-4	1.0E+02	--	9.4E+01	--	1.9E-01	3.4E+00	--	--	--	--	5.0E+04	1.0E+02	--	1.9E-01	Aquatic Habitat			
Styrene	100-42-5	1.0E+01	5.0E-01	1.1E+03	--	--	--	--	8.5E+03	--	3.6E+04	5.0E+04	1.0E+01	1.1E+02	1.0E+01	Odor/Nuis			
tert-Butyl alcohol	75-65-0	1.2E+01	1.2E+01	--	--	1.8E+04	--	--	--	--	--	5.0E+04	--	--	1.2E+01	Tap Canc-Risk			
1,1,1,2-Tetrachloroethane	630-20-6	5.7E-01	5.7E-01	4.8E+02	--	9.3E+02	--	3.8E+00	--	1.7E+01	--	5.0E+04	--	--	5.7E-01	Tap Canc-Risk			

## Summary of Soil ESLs (mg/kg)

Chemicals	CAS No.	Direct Exposure Human Health Risk Levels (Table S-1)							Terrestrial Habitat Levels (Table S-2)			Leaching to Groundwater Levels (Table S-3)		Odor Nuisance Levels (Table S-5)				Basis	
		Residential: Shallow Soil Exposure		Commercial/Industrial: Shallow Soil Exposure		Construction Worker: Any Land Use/Any Depth Soil Exposure			Significantly Vegetated Area	Minimally Vegetated Area	Drinking Water	Non-drinking Water	Gross Contamination Levels (Table S-4)	Res: Shallow Soil Exposure	Com/Ind: Shallow Soil Exposure	Any Land Use: Any Soil Exposure (CW)			
		Cancer Risk	Non-cancer Hazard	Cancer Risk	Non-cancer Hazard	Cancer Risk	Non-cancer Hazard	Any Depth Soil Exposure											
1,2-Dichlorobenzene	95-50-1	--	1.8E+03	--	9.4E+03	--	7.8E+03	4.3E+00	8.5E+00	1.0E+00	1.0E+00	3.8E+02	1.0E+03	2.5E+03	2.5E+03	1.0E+03	1.0E+00	Leaching	
1,3-Dichlorobenzene	541-73-1	--	--	--	--	--	--	6.0E+00	1.2E+01	7.4E+00	7.4E+00	6.1E+02	1.0E+02	5.0E+02	5.0E+02	6.0E+00	6.0E+00	Terr Habitat	
1,4-Dichlorobenzene	106-46-7	2.6E+00	3.4E+03	1.2E+01	2.6E+04	2.8E+02	1.5E+04	4.5E+00	9.0E+00	2.0E+01	2.0E+01	1.9E+02	5.0E+02	1.0E+03	1.0E+03	2.0E+01	2.0E+01	Leaching	
3,3-Dichlorobenzidine	91-94-1	5.8E-01	--	2.7E+00	--	2.0E+01	--	--	--	2.5E-02	1.3E+02	6.0E+01	5.0E+02	1.0E+03	1.0E+03	2.5E+02	2.5E+02	Leaching	
DDD	72-54-8	2.7E+00	--	1.2E+01	--	8.1E+01	--	8.5E+00	1.7E+01	6.5E+01	6.5E+01	6.5E+01	5.0E+02	1.0E+03	1.0E+03	2.7E+00	2.7E+00	Canc-Risk	
DDE	72-55-9	1.8E+00	--	8.3E+00	--	5.7E+01	--	3.3E-01	6.5E-01	2.9E+01	2.9E+01	2.9E+01	5.0E+02	1.0E+03	1.0E+03	3.3E+01	3.3E+01	Terr Habitat	
DDT	50-29-3	1.9E+00	3.7E+01	8.5E+00	5.2E+02	5.7E+01	1.4E+02	1.1E-03	7.8E+00	5.6E+00	5.6E+00	5.6E+00	5.0E+02	1.0E+03	1.0E+03	1.1E+03	1.1E+03	Terr Habitat	
1,1-Dichloroethane	75-34-3	3.6E+00	1.6E+01	2.3E+05	3.7E+02	3.7E+02	7.1E+04	1.1E+01	2.1E+01	2.0E-01	3.1E+01	1.7E+03	5.0E+02	1.0E+03	1.0E+03	2.0E+01	2.0E+01	Leaching	
1,2-Dichloroethane	107-06-2	4.7E-01	3.2E+01	2.1E+00	1.4E+02	4.5E+01	1.3E+02	2.9E+01	2.9E+01	7.0E+03	3.1E+02	3.0E+03	1.0E+02	5.0E+02	5.0E+02	7.0E+03	7.0E+03	Leaching	
1,1-Dichloroethene	75-35-4	--	8.3E+01	3.5E+02	--	3.5E+02	--	4.3E+01	1.3E+02	5.4E-01	4.2E+00	1.2E+03	5.0E+02	1.0E+03	1.0E+03	5.4E-01	5.4E-01	Leaching	
cis-1,2-Dichloroethene	156-59-2	--	1.9E+01	--	8.5E+01	--	7.8E+01	8.4E+01	9.4E+02	1.9E-01	1.6E+00	2.4E+03	1.0E+02	5.0E+02	5.0E+02	1.9E+01	1.9E+01	Leaching	
trans-1,2-Dichloroethene	156-60-5	--	1.3E+02	--	6.0E+02	--	5.7E+02	8.4E+01	9.4E+02	6.5E-01	1.4E+01	1.9E+03	5.0E+02	1.0E+03	1.0E+03	6.5E+01	6.5E+01	Leaching	
2,4-Dichlorophenol	120-83-2	--	2.3E+02	--	3.5E+03	--	1.1E+03	2.1E+00	--	7.5E-03	7.5E-02	5.8E+03	5.0E+02	1.0E+03	1.0E+03	7.5E+01	7.5E+01	Leaching	
1,2-Dichloropropane	78-87-5	1.0E+00	1.6E+01	4.4E+00	6.6E+01	9.9E+01	6.6E+01	3.1E+01	6.3E+01	6.5E-02	6.5E-02	1.4E+03	1.0E+02	5.0E+02	5.0E+02	6.5E+02	6.5E+02	Leaching	
1,3-Dichloropropene	542-75-6	5.7E-01	7.2E+01	2.5E+00	3.1E+02	5.3E+01	3.0E+02	3.1E+01	6.3E+01	1.7E-02	4.0E-02	1.6E+03	5.0E+02	1.0E+03	1.0E+03	1.7E+02	1.7E+02	Leaching	
Dieldrin	60-57-1	3.7E-02	3.5E+00	1.6E-01	4.8E+01	1.1E+00	1.2E+01	9.6E-04	1.1E-01	4.8E-04	6.3E-03	2.4E+01	5.0E+02	1.0E+03	1.0E+03	4.6E-04	4.6E-04	Leaching	
Diethyl phthalate	84-66-2	--	5.1E+04	--	6.6E+05	--	1.5E+05	1.3E+01	2.7E+01	2.5E-02	2.5E-02	7.7E+02	5.0E+02	1.0E+03	1.0E+03	2.5E+02	2.5E+02	Leaching	
Dimethyl phthalate	131-11-3	--	--	--	--	--	--	2.1E+01	4.2E+01	3.5E-02	3.5E-02	4.7E+03	5.0E+02	1.0E+03	1.0E+03	3.5E+02	3.5E+02	Leaching	
2,4-Dimethylphenol	105-67-9	--	1.6E+03	--	2.3E+04	--	7.1E+03	--	--	8.1E+00	8.9E+00	2.4E+04	1.0E+02	5.0E+02	5.0E+02	8.1E+00	8.1E+00	Leaching	
2,4-Dinitrophenol	51-28-5	--	1.6E+02	--	2.3E+03	--	7.1E+02	--	--	3.0E+00	5.7E+00	8.0E+03	5.0E+02	1.0E+03	1.0E+03	3.0E+00	3.0E+00	Leaching	
2,4-Dinitrotoluene	121-14-2	2.2E+00	1.6E+02	1.1E+01	2.3E+03	7.9E+01	7.1E+02	--	--	2.3E-02	1.1E+01	7.2E+02	5.0E+02	1.0E+03	1.0E+03	2.3E+02	2.3E+02	Leaching	
1,4-Dioxane	123-91-1	4.7E+00	8.1E+02	2.2E+01	4.5E+03	2.1E+02	3.4E+03	1.8E+00	1.8E+00	1.7E-04	8.4E-01	1.2E+05	5.0E+02	1.0E+03	1.0E+03	1.7E+04	1.7E+04	Leaching	
Dioxin (2,3,7,8-TCDD)	1746-01-6	4.8E-06	5.1E-05	2.2E-05	7.2E-04	1.5E-04	2.0E-04	1.3E-05	9.9E-05	3.0E-01	3.0E-01	3.0E-01	5.0E+02	1.0E+03	1.0E+03	4.8E-06	4.8E-06	Canc-Risk	
Endosulfan	115-29-7	--	4.2E+02	--	5.8E+03	--	1.5E+03	2.3E-02	3.8E-01	9.8E-03	9.8E-03	1.3E+01	5.0E+02	1.0E+03	1.0E+03	9.8E-03	9.8E-03	Leaching	
Endrin	72-20-8	--	2.1E+01	--	2.9E+02	--	7.4E+01	1.1E-03	1.1E-03	7.6E-03	7.6E-03	3.0E+01	5.0E+02	1.0E+03	1.0E+03	1.1E+03	1.1E+03	Terr Habitat	
Ethylbenzene	100-41-4	5.9E+00	3.4E+03	2.6E+01	2.1E+04	5.4E+02	1.5E+04	9.0E+01	4.3E+02	4.3E-01	4.3E-01	4.9E+02	5.0E+02	1.0E+03	1.0E+03	4.3E+01	4.3E+01	Leaching	
Fluoranthene [PAH]	206-44-0	--	2.4E+03	--	3.0E+04	--	6.7E+03	6.9E-01	1.2E+05	8.6E+01	8.6E+01	8.6E+01	5.0E+02	1.0E+03	1.0E+03	6.9E+01	6.9E+01	Terr Habitat	
Fluorene [PAH]	86-73-7	--	2.4E+03	--	3.0E+04	--	6.7E+03	--	--	6.0E+00	6.0E+00	9.4E+01	5.0E+02	1.0E+03	1.0E+03	6.0E+00	6.0E+00	Leaching	
Heptachlor	76-44-8	1.2E-01	3.5E+01	5.3E-01	4.8E+02	3.7E+00	1.2E+02	2.5E-01	5.0E-01	4.4E+01	4.4E+01	4.4E+01	1.0E+03	2.5E+03	2.5E+03	1.2E-01	1.2E-01	Canc-Risk	
Heptachlor epoxide	1024-57-3	6.2E-02	9.1E-01	2.8E-01	1.3E+01	1.9E+00	3.2E+00	--	--	1.8E-04	6.0E-03	1.2E+01	1.0E+03	2.5E+03	2.5E+03	1.8E-04	1.8E-04	Leaching	
Hexachlorobenzene	118-74-1	1.8E-01	5.6E+01	7.8E-01	7.7E+02	7.7E+00	2.0E+02	1.3E+02	2.5E+02	8.0E-04	8.2E-02	2.3E-01	5.0E+02	1.0E+03	1.0E+03	8.0E-04	8.0E-04	Leaching	
Hexachlorobutadiene	87-68-3	1.2E+00	7.8E+01	5.3E+00	1.2E+03	1.0E+02	3.5E+02	--	--	2.8E-02	6.2E-02	1.7E+01	5.0E+02	1.0E+03	1.0E+03	2.8E-02	2.8E-02	Leaching	
g-Hexachlorocyclohexane (Lindane)	58-89-9	5.5E-01	2.1E+01	2.5E+00	2.9E+02	1.6E+01	7.4E+01	7.4E+00	1.5E+01	7.4E-03	7.4E-03	1.2E+02	5.0E+02	1.0E+03	1.0E+03	7.4E-03	7.4E-03	Leaching	
Hexachloroethane	67-72-1	1.8E+00	3.8E+01	7.8E+00	3.7E+02	1.3E+02	1.2E+02	--	--	1.9E-02	9.2E-02	6.7E+01	5.0E+02	1.0E+03	1.0E+03	1.9E-02	1.9E-02	Leaching	
Indeno[1,2,3-c:cd]pyrene [PAH]	193-39-5	1.1E+00	--	2.1E+01	--	1.1E+02	--	4.8E-01	9.5E-01	1.6E+01	3.2E+01	2.3E+00	5.0E+02	1.0E+03	1.0E+03	4.8E+01	4.8E+01	Terr Habitat	
Lead	7439-92-1	8.2E+01	8.0E+01	3.8E+02	3.2E+02	2.7E+03	1.6E+02	3.2E+01	3.2E+01	--	--	--	--	--	--	--	3.2E+01	3.2E+01	Terr Habitat
Mercury (elemental)	7439-97-6	--	1.3E+01	--	1.9E+02	--	4.4E+01	1.5E+01	2.0E+01	--	--	--	--	--	--	--	1.3E+01	1.3E+01	NC-Hazard
Methoxychlor	72-43-5	--	3.5E+02	--	4.8E+03	--	1.2E+03	1.3E-01	4.1E+03	1.3E-02	1.3E-02	1.6E+01	5.0E+02	1.0E+03	1.0E+03	1.3E+02	1.3E+02	Leaching	
Methylene chloride	75-09-2	1.9E+00	3.1E+02	2.5E+01	2.5E+03	4.9E+02	1.4E+03	9.8E-01	2.0E+00	1.2E+01	1.9E-01	3.3E+03	5.0E+02	1.0E+03	1.0E+03	1.2E+01	1.2E+01	Leaching	
Methyl ethyl ketone	78-93-3	--	2.7E+04	--	2.0E+05	--	1.2E+05	4.4E+01	8.8E+01	6.1E+00	1.5E+01	2.8E+04	5.0E+02	1.0E+03	1.0E+03	6.1E+00	6.1E+00	Leaching	
Methyl isobutyl ketone	108-10-1	--	3.4E+04	--	1.4E+05	--	1.4E+05	--	--	3.6E-01	5.1E-01	3.4E+03	1.0E+02	5.0E+02	5.0E+02	3.6E-01	3.6E-01	Leaching	
Methyl mercury	22967-92-6	--	6.3E+00	--	8.2E+01	--	1.9E+01	3.4E-02	3.4E-02	--	--	--	1.0E+02	5.0E+02	5.0E+02	3.4E-02	3.4E-02	Terr Habitat	
2-Methylnaphthalene	91-57-6	--	2.4E+02	--	3.0E+03	--	6.7E+02	--	--	8.8E-01	8.8E-01	3.9E+02	5.0E+02	1.0E+03	1.0E+03	8.8E-01	8.8E-01	Leaching	
Methyl tertiary butyl ether (MTBE)	1634-04-4	4.7E+01	1.6E+04	2.1E+02	6.6E+04	4.1E+03	6.5E+04	3.1E+01	6.3E+01	2.8E-02	2.5E+00	9.0E+02	1.0E+02	5.0E+02	5.0E+02	2.8E-02	2.8E-02	Leaching	



2019 (Rev. 2)		Summary of Vapor ESLs												
		Subslab/ Soil Gas (µg/m³)					Indoor Air (µg/m³)							
Chemicals	CAS No.	Subslab/Soil Gas Vapor Intrusion: Human Health Risk Levels (Table SG-1)				Subslab/ Soil Gas Vapor Intrusion: Odor Nuisance Levels (Table SG-2)	Tier 1 ESL	Basis	Direct Exposure Human Health Risk Levels (Table IA-1)			Odor Nuisance Levels (Table IA-2)	Tier 1 ESL	Basis
		Residential		Commercial/ Industrial					Residential	Commercial/ Industrial				
		Cancer Risk	Non-cancer Hazard	Cancer Risk	Non-cancer Hazard									
										Cancer Risk	Non-cancer Hazard			
Dioxin (2,3,7,8-TCDD)	1746-01-6	2.5E-06	1.4E-03	1.1E-05	5.8E-03	--	2.5E-06	Canc-Risk	7.4E-08	4.2E-05	3.2E-07	1.8E-04	7.4E-08	Canc-Risk
Endosulfan	115-29-7	--	--	--	--	--	--	--	--	--	--	--	--	--
Endrin	72-20-8	--	--	--	--	--	--	--	--	--	--	--	--	--
Ethylbenzene	100-41-4	3.7E+01	3.5E+04	1.6E+02	1.5E+05	6.7E+04	3.7E+01	Canc-Risk	1.1E+00	1.0E+03	4.9E+00	4.4E+03	1.1E+00	Canc-Risk
Fluoranthene [PAH]	206-44-0	--	--	--	--	--	--	--	--	--	--	--	--	--
Fluorene [PAH]	86-73-7	--	--	--	--	--	--	--	--	--	--	--	--	--
Heptachlor	76-44-8	7.2E-02	--	3.1E-01	--	1.0E+04	7.2E-02	Canc-Risk	2.2E-03	--	9.4E-03	--	2.2E-03	Canc-Risk
Heptachlor epoxide	1024-57-3	3.6E-02	--	1.6E-01	--	1.0E+04	3.6E-02	Canc-Risk	1.1E-03	--	4.7E-03	--	1.1E-03	Canc-Risk
Hexachlorobenzene	118-74-1	1.8E-01	--	8.0E-01	--	--	1.8E-01	Canc-Risk	5.5E-03	--	2.4E-02	--	5.5E-03	Canc-Risk
Hexachlorobutadiene	87-68-3	4.3E+00	--	1.9E+01	--	4.0E+05	4.3E+00	Canc-Risk	1.3E-01	--	5.6E-01	--	1.3E-01	Canc-Risk
g-Hexachlorocyclohexane (Lindane)	58-89-9	--	--	--	--	--	--	--	--	--	--	--	--	--
Hexachloroethane	67-72-1	8.5E+00	1.0E+03	3.7E+01	4.4E+03	--	8.5E+00	Canc-Risk	2.6E-01	3.1E+01	1.1E+00	1.3E+02	2.6E-01	Canc-Risk
Indeno[1,2,3-c,d]pyrene [PAH]	193-39-5	--	--	--	--	--	--	--	--	--	--	--	--	--
Lead	7439-92-1	--	--	--	--	--	--	--	--	--	--	--	--	--
Mercury (elemental)	7439-97-6	--	1.0E+00	--	4.4E+00	--	1.0E+00	NC-Hazard	--	3.1E-02	--	1.3E-01	3.1E-02	NC-Hazard
Methoxychlor	72-43-5	--	--	--	--	--	--	--	--	--	--	--	--	--
Methylene chloride	75-09-2	3.4E+01	1.4E+04	4.1E+02	5.8E+04	1.9E+07	3.4E+01	Canc-Risk	1.0E+00	4.2E+02	1.2E+01	1.8E+03	1.0E+00	Canc-Risk
Methyl ethyl ketone	78-93-3	--	1.7E+05	--	7.3E+05	1.1E+06	1.7E+05	NC-Hazard	--	5.2E+03	--	2.2E+04	5.2E+03	NC-Hazard
Methyl isobutyl ketone	108-10-1	--	1.0E+05	--	4.4E+05	1.4E+04	1.4E+04	Odor/Nuis	--	3.1E+03	--	1.3E+04	4.2E+02	Nuis/Odor
Methyl mercury	22967-92-6	--	--	--	--	--	--	--	--	--	--	--	--	--
2-Methylnaphthalene	91-57-6	--	--	--	--	2.3E+03	2.3E+03	Odor/Nuis	--	--	--	--	6.8E+01	Nuis/Odor
Methyl tertiary butyl ether (MTBE)	1634-04-4	3.6E+02	1.0E+05	1.6E+03	4.4E+05	1.8E+04	3.6E+02	Canc-Risk	1.1E+01	3.1E+03	4.7E+01	1.3E+04	1.1E+01	Canc-Risk
Molybdenum	7439-98-7	--	--	--	--	--	--	--	--	--	--	--	--	--
Naphthalene [PAH]	91-20-3	2.8E+00	1.0E+02	1.2E+01	4.4E+02	1.5E+04	2.8E+00	Canc-Risk	8.3E-02	3.1E+00	3.6E-01	1.3E+01	8.3E-02	Canc-Risk
Nickel	7440-02-0	--	--	--	--	--	--	--	--	--	--	--	--	--
Pentachlorophenol	87-86-5	--	--	--	--	--	--	--	--	--	--	--	--	--
Perchlorate	7790-98-9	--	--	--	--	--	--	--	--	--	--	--	--	--
Petroleum - Gasoline	--	--	2.0E+04	--	8.3E+04	3.3E+03	3.3E+03	Odor/Nuis	--	6.0E+02	--	2.5E+03	1.0E+02	Nuis/Odor
Petroleum - Stoddard Solvent	--	--	1.1E+04	--	4.6E+04	3.3E+04	1.1E+04	NC-Hazard	--	3.3E+02	--	1.4E+03	3.3E+02	NC-Hazard
Petroleum - Jet Fuel	--	--	1.1E+04	--	4.6E+04	3.3E+04	1.1E+04	NC-Hazard	--	3.3E+02	--	1.4E+03	3.3E+02	NC-Hazard
Petroleum - Diesel	--	--	8.9E+03	--	3.7E+04	3.3E+04	8.9E+03	NC-Hazard	--	2.7E+02	--	1.1E+03	2.7E+02	NC-Hazard
Petroleum - HOPs	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Petroleum - Motor Oil	--	--	--	--	--	--	--	--	--	--	--	--	--	--

From: [Harald](#)  
To: [midcoastcommunitycouncil@gmail.com](mailto:midcoastcommunitycouncil@gmail.com)  
Cc: [mschaller@smcgov.org](mailto:mschaller@smcgov.org); [Martinez, Erik@Coastal](mailto:Martinez,Erik@Coastal); [planning-commission@smcgov.org](mailto:planning-commission@smcgov.org); [Lisa Ketcham](#)  
Subject: PUD 140 Cypress Point Moss Beach / MidPen - (APN 037-022-070)  
Date: Wednesday, March 11, 2020 6:36:41 PM  
Attachments: [1579219760238blob.jpg](#)  
[1579219694296blob.jpg](#)

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Dear Midcoast Community Council members,

The proposed Cypress Point project includes proposed amendment to the San Mateo County General Plan to change the land use designation of APN 037-022-070, amendment to the County's Zoning Map, amendment of the County's zoning text, and creation of an entirely new Planned Unit Development (PUD -140) designation for the project site.

With this letter I want to iterate my concerns raised during the Feb 26 MCC meeting regarding the PUD -140. While PUD-140 contains a number of misleading statements, I'm especially concerned about the following two items:

### **1. Environmental impact due to proximity to an environmentally sensitive habitat areas (ESHA) – Montara Creek**

The 1985 EIR for a different project on the same site found that **Montara Creek is located approximately 50 feet north of the project site.** The Montara Creek riparian corridor is an Environmentally Sensitive Habitat Area (ESHA) as defined by the San Mateo County LCP.

PUD-140 states on page 7:

**No environmentally sensitive habitat areas (ESHA) have been identified on the project site. The closest ESHA is Montara Creek, which lies to the north of the project parcel.**

And page 21 states:

**Montara Creek, a perennial stream, is located approximately 250 feet to the northeast of the site, and runs parallel to the site's northern border.**

**Question: Why does the EIR from 1985 state a distance of 50 feet to Montara Creek (ESHA) vs 250 feet in PUD-140? Did property boundaries or the location of Montara Creek change?**

**2. Updated liquefaction maps show that the named property (APN 037-022-070) is in a landslide zone and parts are in a liquefaction landslide overlap zone.**

Source: The California Geological Survey released a series of new seismic hazard zones for parts of San Mateo and Contra Costa counties (April 2019) including Moss Beach.

<https://www.mercurynews.com/2019/04/05/earthquake-maps-for-san-mateo-contra-costa-counties-show-vulnerable-areas/>

PUD 140 Page 21 states:

Hazards Component Policy 9.1 (Definition of Hazard Areas) defines hazardous areas as “fault zones and land subject to dangers from liquefaction and other severe seismic impacts, unstable slopes, landslides, coastal cliff instability, flooding, tsunamis, fire, and steep slopes (over 30%).”

AND

The subject site is not within or immediately adjacent to a known fault zone, nor does it have steep or unstable slopes or soils subject to liquefaction.

**Question: What additional measures need be taken to build a large scale development in a landslide and liquefaction landslide overlap zone? This is especially important as this property has been extensively used by the Navy in the past and no records are available indicating that the site has been cleaned up.**

Thank you for all your work on the MCC.



Best regards,

Harold Herrman

SM MidCoast

Inline image



# Midcoast Community Council

*An elected Advisory Council to the San Mateo County Board of Supervisors*

*representing Montara, Moss Beach, El Granada, Princeton, and Miramar*

P.O. Box 248, Moss Beach, CA 94038-0248 | [midcoastcommunitycouncil.org](http://midcoastcommunitycouncil.org)

**Len Erickson | Michelle Weil | Claire Toutant | Barbra Mathewson | Dan Haggerty | Dave Olson**

Chair

Vice-Chair

Secretary

Treasurer

Date: February 26, 2020

To: San Mateo County Planning Commission

Cc: Michael Schaller, Project Planner  
Steve Monowitz, Community Development Director  
Stephanie Rexing, North Central District Supervisor, California Coastal Commission  
Erik Martinez, Coastal Program Analyst, California Coastal Commission

From: Midcoast Community Council

Subject: **Cypress Point PUD-140/CD Zoning and LCP Amendment (PLN2018-0264)**

The majority of the Midcoast Community Council, as well as community members who have spoken at recent public meetings, continue to oppose the Cypress Point project. The primary reasons cited include lack of access to amenities such as shopping, roads, and transit, and the increased traffic, both in the local neighborhood, and on Highway 1. Concern has also been expressed about lack of resources to support the development, particularly water, sewer, and fire, as well as strong interest in an environmental impact report.

The scope of this letter is limited to the PUD-140/CD amendment. The Midcoast Community Council requests three changes to the proposed amendment, as detailed below.

## **Building Height:**

The MCC requests that the amendment for PUD-140/CD Zoning for this project be changed to have a maximum height of 28 feet, using the measurement methodology for the R-1/S-17 zoning. The PUD-140/CD zoning change should also mention the R-1/S-17 height measurement methodology.

We suggest that this be done by adding the following to the PUD-140CD amendment:

*Buildings shall be a maximum of two stories, with a maximum height of 28 feet. The building height shall be measured as the vertical distance from the lowest of natural or finished grade to the topmost point of the building immediately above.*

We request this height limit to maintain harmony with the zoning in the nearby unincorporated residential community, and to reduce the visual mass of the buildings in this project. LCP Policy 3.13 says:

*Require that new development providing significant housing opportunities for low and moderate income persons contribute to maintaining a sense of community character by being of compatible scale, size and design.*

The height could be reduced by changing roof slope, or by incorporating secondary roof forms, maintaining the steeper pitch over only a portion of the building width. Other methods are also possible.

**Building Setbacks:**

The proposed PUD-140/CD amendment would reduce the building setback on the West side of the property near Carlos Street from 20 to 11 feet. The Midcoast Community Council requests that the setback remain at 20 feet, to maintain consistency with the adjacent R-1/S-17 zoning district.

**Project Density:**

Although the proposed zoning amendment would reduce the project density from Medium High Density to Medium Density, the 71 affordable housing units proposed would be concentrated within a 5.39 acre area on the parcel, representing a density of 13.17 units per acre. We therefore request that the total number of housing units for the site be reduced further to 46 units, representing a density of 8.53 units per developed acre, or 4.23 units per total acre of the parcel.

This further reduction in density would preserve the community character of the neighborhood, and help alleviate the impact on traffic and local resources that Midcoast constituents care about deeply.

**Conclusion:**

In summary, the Midcoast Community Council requests the following changes to the PUD-140/CD Zoning and LCP amendment:

- Restrict maximum building height to 28 feet, measured as the vertical distance from the lowest of natural or finished grade to the topmost point of the building immediately above.
- Maintain building setback of 20 feet along the West side of the property.
- Reduce the total number of units to 46 affordable housing units.

In addition to our concerns specific to the amendment expressed in this letter, we are attaching three previous letters detailing the broader concerns of the Midcoast Community Council and the community we represent surrounding the Cypress Point project. We request that the Project Planner respond to the concerns raised in our previous letters, and specifically to the comprehensive letter dated 8/22/18. Thank you for considering the people most affected by this project as you evaluate the amendment and the project as a whole.

MIDCOAST COMMUNITY COUNCIL  
s/Len Erickson Chair



# Midcoast Community Council

*representing Montara, Moss Beach, El Granada, Princeton, and Miramar*  
P.O. Box 248, Moss Beach, CA 94038-0248 - [www.MidcoastCommunityCouncil.org](http://www.MidcoastCommunityCouncil.org)

**Dave Olson . Claire Toutant . Lisa Ketcham . Dan Haggerty . Chris Johnson . Brandon Kwan . Barbra Mathewson**  
Chair Vice-Chair Secretary Treasurer

Date: August 22, 2018

To: Michael Schaller, Project Planner

cc: Supervisor Don Horsley  
Steve Monowitz, Community Development Director  
Renée Ananda, CCC Coastal Program Analyst

From: Midcoast Community Council/ Dave Olson, Chair

Subject: **Proposed 71-Unit Cypress Point Affordable Housing Community  
on Carlos St, Moss Beach – PLN2018-00264, APN 037-022-070**

Wide public opposition to this project continues unabated, as demonstrated at MCC standing-room-only meeting 8/22/18 to consider this referral.

MCC 9/27/17 comments<sup>1</sup> on the pre-application for this project focused on the many long-standing community concerns regarding traffic, transit, and bike/pedestrian safety & mobility that are the subject of the Highway 1 Safety & Mobility Improvement Studies (Mobility Study), the Midcoast Highway 1 Crossings Project and the soon-to-be-released final draft of Connect the Coastside's Comprehensive Transportation Management Plan. Many years of Midcoast growth without much-needed and long-identified bike/ped safety and mobility improvements have caught up with us now with too many people dependent on their cars and stuck in traffic without safe and convenient alternative transportation. The key challenge to this project is the isolated rural site without adequate transit or bike/ped facilities, leaving residents dependent on their automobiles to reach jobs and services on already congested roads.

## Midcoast Residential Build-out

MCC has consistently advocated for the need to significantly reduce Midcoast residential build-out. The proposed LCP amendment would reduce land use density for this 11-acre parcel from medium-high to medium. Residential build-out numbers currently allocated to the parcel would be reduced by more than half, from 148 to 71 units.

## Affordability and Residency Preference for Local Workers

A stated project objective is to improve the jobs-housing balance in the Midcoast region; however, Midcoast housing far exceeds local jobs. The applicant has stated they would not be legally allowed to restrict housing to those with local jobs, but that a portion of the units will include a preference for households who already live or work in the region. MCC would prefer that the preference apply to all units. Every new residential unit that does not provide affordable housing for our local workforce, adds to our coastal jobs-housing imbalance and traffic congestion.

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<sup>1</sup> <http://www.midcoastcommunitycouncil.org/storage/mtgs-com2017/2017-09-27-MidPen-pre-app-MCC-com.pdf>

The requested amendment to LCP Policy 3.15(d) calls for all units, apart from resident manager's, to serve low- or moderate-income households. Elsewhere in the submittal the project consistently proposes all units restricted to low income (less than 80% AMI). MCC requests that the proposed LCP amendment match the rest of the submittal regarding low income affordability.

San Mateo County AMI is significantly higher than what local Coastside jobs provide. In Half Moon Bay one quarter of households earns less than \$50,000 per year. Please clarify how the proposed income restrictions would provide a Coastside jobs-housing fit.

### **Construction Phasing**

Construction is proposed in one phase, over approximately 18 months. If built in two phases, would there be more opportunity for residents with Coastside jobs to receive preference? Approving more than the annual limit of 40 residential units/year cannot be justified if many of those units will go to residents commuting to jobs out of the area.

### **Public Transit**

The project site is located on the Hwy 1 corridor adjacent to SamTrans Route 17 bus stops at 14<sup>th</sup> & 16<sup>th</sup>. Route 17 directly reaches Coastside job hubs in Half Moon Bay, Princeton, and Pacifica (10 minutes to Linda Mar and 25 minutes to downtown HMB). Current #17 service is hourly on weekdays, and every two hours on weekends. However, on weekdays at this location there is no southbound AM or northbound PM service when #17 is routed via Sunshine Valley Road (SVR). Route #18 has limited weekday service to Middle and High School in HMB but is also routed via SVR. Outside those hours, ridership utilizing SVR bus stops is very low and the more direct route on Etheldore and Highway 1 better serves other riders.

Mitigation TRAF-5B: The applicant proposes to address the safety of pedestrians crossing to the adjacent southbound bus stop at the lighthouse hostel by eliminating it and re-routing all buses via SVR. That would also eliminate the Hwy 1 bus stop at 14<sup>th</sup>, and Etheldore stops at California and Vermont. The closest bus stops to the project would then be 1/2 mile to 7<sup>th</sup>/Main or 3/4 mile to Etheldore/SVR, well outside the 1/4 mile range of convenience.

This proposal ignores the need for safe crossing at lighthouse/16<sup>th</sup> for the Coastal Trail, and inefficiency of SVR during non-school hours and travel direction. In order to serve the project, it would be better to keep the adjacent bus stop at the lighthouse hostel and explore re-routing all Route 17 trips to Hwy 1 and Etheldore, and leaving Route 18 to serve school riders on SVR.

This project highlights the urgent need for expanded Coastside public transit. Without convenient school and commuter bus service at this location on the highway corridor, or a project-sponsored shuttle to and from local jobs, this project cannot be justified.

### **Bike/Pedestrian Safety & Mobility**

For pedestrian safety, Mitigation TRAF-5A proposes a sidewalk connection between the project entrance on Carlos to the north side of Sierra Street.

The need for safe highway crossing at the lighthouse/16<sup>th</sup> cannot be brushed aside by saying there is no need for residents to cross the highway because the bus stop has

been removed. East side residents, workers and visitors all need to be able to conveniently walk or bike to the west side for recreation. Two crossing concepts for the lighthouse/16<sup>th</sup> were included in the 2012 Mobility Study – a raised median refuge island for 2-stage crossing and an overcrossing to the south where the road cut makes that feasible. The proposed project, with a significant number of new bike/ped/transit users, makes a safe crossing urgent.

If this housing project is to proceed, the Parallel Trail segment in this area must be prioritized and implemented, at a minimum between downtown Moss Beach and 14<sup>th</sup> St. Creating a bike/pedestrian-friendly community and calming highway traffic will help draw the kind of neighborhood commercial businesses needed to serve existing and future residents.

### **Vehicle Highway Access & Safety**

**Carlos:** Mitigation TRAF-2B proposes to decrease hazards by closing Carlos St north of the project entrance to all vehicles except emergency services. The Mobility Study and Connect the Coastside show this intersection as right turn only entering the highway and continued use of the center left turn lane eastbound into Carlos. Traffic counts show significant existing peak hour traffic from Sierra and Stetson using this route, which should remain available. Feasibility of re-routing Carlos to 16<sup>th</sup> for safer vehicle highway access needs further analysis. It is insufficient to say it is not feasible due to grading requirements and Level of Service (LOS) impact on 16<sup>th</sup> St, which has only three residences.

**Valleamar/Etheldore and lighthouse/16<sup>th</sup>:** Mitigation TRAF-3B proposes to address LOS by restricting peak hour left turns entering the highway at Etheldore/Valleamar. Left turns would be reassigned to Calif/Wienke. This would be a significant re-route for Valleamar which does not connect directly to Wienke and would add trips to that complicated 5-way intersection. As long as there is lane space on Valleamar so that left-turning vehicles do not block those turning right, turning movements should not be restricted simply to achieve a better LOS rating. A similar right-turn-only restriction proposed for lighthouse/16<sup>th</sup> during PM peak period seems unnecessary to address LOS at that very lightly used intersection.

**California/Wienke:** Mitigation TRAF-1A proposes to address LOS by converting intersection control at California/Wienke to roundabout or signal, to be determined by ICE study required by Caltrans. California meets the signal warrant under existing conditions. Additional project trips at this intersection should be re-calculated for keeping Carlos open and should also consider that all new and re-assigned traffic will not necessarily use California for highway access. When a queue builds, motorists often choose among the three other adjacent intersections to spread out the wait time to enter the highway.

MCC and the community are adamantly opposed to any more traffic signals in the Midcoast. A signal at California, stopping highway traffic, and added pollution-spewing stacking lanes further splitting our town, would destroy the community vision for a context appropriate village circulation plan as was outlined in the Safety & Mobility Study. A roundabout at each end of Moss Beach would calm traffic without stopping it, provide safe pedestrian crossings, and convenient U-turns to avoid making left turns onto the highway, improving LOS at all intersections.

## Discrepancies in submittal documents

### Consistency Evaluation

Table 1, LCP Policies:

Policy 3.16(a)

- *"limits the number of building permits in any 12-month period to 60".*  
Correction: not building permits, but affordable housing units.

Policy 3.3:

- *"A portion of units in the project will include a preference for households who already live or work in the region."*  
Other references in the application make no mention of limiting this preference to a portion of the units. Please clarify.
- *"According to census data compiled in 2016, the three adjacent communities of Montara, Moss Beach, and El Granada – all of which are within 6 miles of the project site – contain 1,364 jobs."*  
Does this include jobs in Princeton and unincorporated Miramar?
- *"The project is within 1/4 mile walking distance of the Coastsides Market grocery, Moss Beach Park, Farallone View Elementary School, and the Seton Coastsides Medical Center."*  
Correction: Coastsides Market (a liquor/convenience store) and Moss Beach Park 1/2 mile, Farallone View School 1 mile, Seton Medical Center 1.2 miles.

Table 4 Community Plan 7.2(b):

- *"The project would consist of two-story buildings with roof heights varying between 32 and 36 ft."*  
This conflicts with PUD-124, #5: *"No structure shall exceed two stories or an average height of 25 ft."*  
Adherence to the lower height limit will help with neighborhood visual compatibility.

### Cumulative Impacts Analysis

Table 3 – List of Reasonably Foreseeable Projects

- HMB and Pacifica included comprehensive list with single-family dwellings. SMC unincorporated Midcoast includes only Big Wave, Harbor Village RV, 7<sup>th</sup> St Hotel, Main St Hotel. The mixed-use building at Hwy 1/Virginia and the many Midcoast single-family dwellings in the permitting process should be included.

Table 4&5 -- Population & Housing Units

- Pacifica and HMB are included, but the Midcoast is represented by only Montara and Moss Beach. El Granada, Princeton, and Miramar should be included.

Hwy 1 Moss Beach 50 mph speed limit is consistently misreported:

### Responses to Workshop Comments

#3 Traffic: *"combination of conditions that include 55 mph speed limits..."*

#8 Pedestrian Traffic: *"operational challenges due to the 55 mph speed limit..."*

Traffic Impact Analysis, p.33: *"a 55-mph facility such as Highway 1"*

Thank you for the opportunity to comment.



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**Dave Olson . Claire Toutant . Lisa Ketcham . Dan Haggerty . Chris Johnson . Brandon Kwan . Barbra Mathewson**  
Chair Vice-Chair Secretary Treasurer

Date: September 26, 2018

To: Michael Schaller, Project Planner

cc: Supervisor Don Horsley  
Steve Monowitz, Community Development Director  
Renée Ananda, CCC Coastal Program Analyst

From: Midcoast Community Council/ Dave Olson, Chair

Subject: **Proposed 71-Unit Cypress Point Affordable Housing Community  
on Carlos St, Moss Beach – PLN2018-00264, APN 037-022-070**

Thank you for the additional time to comment on this project referral. The following comments are in addition to those MCC submitted on August 22, 2018 (attached).

## **Hazardous Materials**

- Additional soil sampling should be performed, as recommended in the Phase 2 report, to assess the horizontal extent of lead-impacted surface soils.
- Remnants of 1940's-era buildings should be assessed for asbestos-containing materials, and surface soils should be analyzed for elevated levels of asbestos fibers.

## **Traffic Impacts and the Comprehensive Transportation Management Plan (CTMP)**

It does not serve the community or the project, to attempt to determine key circulation elements for Moss Beach absent an approved long-range Comprehensive Transportation Management Plan (CTMP), aka Connect the Coastside.

- Project traffic impacts and proposed mitigations are analyzed based on existing LOS standards, whereas the March 2016 draft of the long-delayed CTMP proposes a significant revision of LOS standards.
- Project traffic mitigations propose re-routing peak-hour Vallemar highway access to Wienke, whereas the 2016 draft CTMP clearly states Wienke highway access would have to be restricted and an alternate route identified. Vallemar or Wienke are the only access points for a neighborhood of about 75 homes.
- The 2016 CTMP draft proposal of two Hwy 1 traffic signals at California and Cypress galvanized a strong Midcoast preference for roundabouts, which has since been partially addressed with a feasibility study for Cypress. At California/Wienke the 2016 draft CTMP (p. 25) balks at doing any significant study for a roundabout due to the complication of the 5-way intersection, but then acknowledges that a signalized intersection would require re-routing Wienke Way! The community has heard no more on the matter until the Community Development Director's 8/16/18 email which does not bode well: "From our analysis to date, the project will necessitate the installation of a signal and improved crossing at California Ave."

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**Claire Toutant** **Len Erickson** **Dave Olson** **Barbra Mathewson** **Dan Haggerty** **Michelle Weil** **Tamar Powell**  
Chair Vice-Chair Secretary Treasurer

Date: May 22, 2019  
To: Michael Schaller, Project Planner  
Cc: Supervisor Don Horsley  
Steve Monowitz, Community Development Director  
From: Midcoast Community Council/ Claire Toutant, Chair  
Subject: Cypress Point LCP Amendment and PUD zoning change – PLN2018-00264,  
APN 037-022-070

The following comments are made with respect to the updated application documents, submitted on April 15, 2019. They are a followup to comments submitted on August 22, 2018 and September 26, 2018.

In the updated Cover Letter, in response to earlier MCC comments, it states:

The proposed live-work preference for the project will ultimately be determined by San Mateo County.

In earlier meetings and documents, the preference for renters who work in the area was said to be part of the MidPen Housing application process. Please clarify how the County will determine this, and under what process.

In the Policy Consistency Evaluation document, it states:

The project would consist of two-story buildings with roof heights varying between 32 and 36 feet. Considering the elevation of the project site and existing on site trees to be retained, the project would not appear out of scale with the community.

Related statements are made in the Aesthetic Visual Resources document in sections 2 and 6, with both sections stating "Less than Significant Impact".

The MCC disagrees, and regards this as a Significant Impact.

As the MCC has stated many times in the past, we believe that building heights above 28 feet are a problem for the Midcoast, impacting views, and increasing perception of high mass in developments. This is particularly true with 18 buildings in close proximity.

We request that the maximum height be limited to 28 feet to be consistent with existing Midcoast standards. This could easily be done by having a lower pitched roof than is shown in the preliminary design drawings. There is no need for a 4 in 12 slope roof in this area, and many homes have

significantly lower slopes. The comparison to the height of the existing water tanks is not relevant, in our opinion.

Please list all the changes proposed to the PUD Zoning for this parcel.

In the Energy Report, in the Impact Analysis section, is this paragraph:

#### CONSTRUCTION ENERGY USAGE

Project construction would require site preparation, site grading and excavation, trenching, interior architectural finishing, paving and landscaping. Construction would be typical for the region and building type, and the project site does not include unusual building challenges that would require unusually high energy usage. The importation of a maximum of 7,000 cubic yards of fill material would be required, which would result in a maximum of 692 haul truck trips, as indicated in the California Emissions Estimator Model (CalEEMod) modeling estimates in the Air Quality Technical Report.

We are concerned about the amount of fill, and particularly the number of haul truck trips to bring it to the site. We would suggest a design change to minimize the amount of fill required for the project, and if at all possible, to use cut and fill methods, rather than importing fill.

In the Cumulative Impacts document, it appears that it is out of date, missing current and planned projects in Moss Beach. It also appears that the Big Wave project is not included. The lack of details makes it hard to check. It would be helpful if the projects in the Midcoast were listed in an appendix to this document.

With respect to the updated evaluation of traffic impact and mitigation, we appreciate the inclusion of transportation alternatives, and discussion of roundabouts, rather than just signals. The Council requests that the PUD zoning change not be approved until after Connect the Coastside is finalized and approved by the Coastal Commission.

We are also pleased to see that the development will design and build to LEED standards.

MIDCOAST COMMUNITY COUNCIL

s/Claire Toutant, Chair

## Rexing, Stephanie@Coastal

---

**From:** Len Erickson <lenericksonmcc@gmail.com>  
**Sent:** Tuesday, February 25, 2020 9:39 PM  
**To:** Steve Monowitz  
**Cc:** Joe LaClair; Mike Schaller; Rexing, Stephanie@Coastal; Martinez, Erik@Coastal  
**Subject:** Concerns with Commenting on the Cypress Point Project  
**Attachments:** 2019\_2018\_MCC\_CypressPt\_Referrals.pdf

To: Steve Monowitz, SMC Community Development Director

cc:  
SMC Planning Staff  
Joe LaClair  
Mike Schaller

California Coastal Commission  
Stephanie Rexing  
Erik Martinez

From: Len Erickson, MCC Chair

This letter expresses process concerns about the status of review comments from the MCC to San Mateo County regarding the Cypress Point project.

I am raising these points as MCC Chair in an effort to get responses from San Mateo County that will enable the MCC to make further comments on this project.

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With the proposed next Planning Commission session on the Cypress Point project scheduled in late March, I would like to highlight points that make it difficult for the MCC to provide relevant and appropriate feedback on this project:

### Lack of Response to the MCC's Comment Letters

Prior to the January 22 PC session, the MCC had provided comments in three separate letters. On January 7 I provided the three letters in a single document

- o 2019-05-22-CypressPt-referral-MCC
- o 2018-09-26-CypressPt-referral-MCC
- o 2018-08-22-CypressPt-referral-MCC-rev2

sent to Mike Schaller in an email (attached). Mike Schaller acknowledged receipt and that this document was helpful. While the staff report for the Jan. 22 meeting contained specific reference and responses to the first two letters, it omitted the third referral, 8-22-2018 which was the most detailed submission. Without specific response to this letter, it has been difficult for the MCC to gauge the Planning Departments perspective on the issues we raised.

Neither the voluminous staff report (600+ pages) nor the 25 itemized responses on the County's project page:

<https://planning.smcgov.org/cypress-point-affordable-housing-community-project>

are helpful in this matter.

Consider Transportation in the following three documents, one issued prior and two issued after to the 8-22-2018 MCC Referral.

2. Responses to Workshop Comments.pdf (July 2018)
7. PrelimEnvEval UPDATE 4-19.pdf
23. Transportation Impact Analysis - UPDATE 4-19.pdf



The staff report makes reference to the role of Connect the Coastside (CTC) in a discussion on (pp. 14-15) - Policy 2.52 (Traffic Mitigation for all Development in the Urban Midcoast) and introduces the new term TIMP, which is presumably a renaming of the term in use for several years (Comprehensive Transportation Management Plan – CTMP). How all the transportation related documents fit together is unclear and will not come to the public until April, after the proposed final Planning Commission hearing on the Zoning amendment.

As an example of the difficulty in understanding the situation:

- Project document (2. Responses to Workshop Comments.pdf - July 2018) calls for the closure of the intersection of Carlos Street north with SR1.
- The MCC letter - 2018-08-22 – critiqued this closure for several reasons including its role in completing the California Coastal Trail in the Midcoast.
- No further reference is made to this recommendation until the Connect the Coastside document made a reference utilizing Carlos in as shown in a concept diagram.

Stepping back and reviewing the overall picture, the complicated discussion above I would like to make the following point:

- A year ago, the MCC convened a discussion of MCC members with. County Staff and Caltrans Staff to discuss the Moss Beach Corridor, an SR1 road segment extending extending from the south Etheldore South / SR1 to Etheldore North / SR1. The impact of the Cypress Point Project is to extend the Corridor definition from Etheldore South / SR1 to Montara's 16<sup>th</sup> Street / SR1.
- In moving forward, the full extent of the uses, opportunities and requirements for the expanded SR1 Moss Beach Corridor should be considered and not be primarily driven by the potential impacts of the Cypress Point Project.

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Len Erickson, Chair  
Michelle Weil, Vice Chair  
Claire Toutant, Secretary  
Tamar Powell, Treasurer  
Barbra Mathewson  
Dan Haggerty  
Dave Olson

Date: January 7, 2020

To: Michael Schaller, Project Planner

From: Len Erickson, Midcoast Community Council, Chair

Re: **Proposed 71-Unit Cypress Point Affordable Housing Community on 11 acres at Carlos & Sierra St, Moss Beach – APN 037-022-070**

Dear Michael,

In 2018 and 2019 the MCC held public discussions on the Cypress Point project and submitted three referrals with approved comments. To avoid confusion and to insure all three letters are on the record, I am including them in this single document:

- 2019-05-22-CypressPt-referral-MCC
- 2018-09-26-CypressPt-referral-MCC
- 2018-08-22-CypressPt-referral-MCC-rev2

Please ensure that this document with the three referrals is included in the staff report for the project.

Midcoast Community Council  
s/Len Erickson, Chair

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**Claire Toutant** **Len Erickson** **Dave Olson** **Barbra Mathewson** **Dan Haggerty** **Michelle Weil** **Tamar Powell**  
Chair Vice-Chair Secretary Treasurer

Date: May 22, 2019  
To: Michael Schaller, Project Planner  
Cc: Supervisor Don Horsley  
Steve Monowitz, Community Development Director  
From: Midcoast Community Council/ Claire Toutant, Chair  
Subject: Cypress Point LCP Amendment and PUD zoning change – PLN2018-00264,  
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Chair Vice-Chair Secretary Treasurer

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on Carlos St, Moss Beach – PLN2018-00264, APN 037-022-070**

Wide public opposition to this project continues unabated, as demonstrated at MCC standing-room-only meeting 8/22/18 to consider this referral.

MCC 9/27/17 comments<sup>1</sup> on the pre-application for this project focused on the many long-standing community concerns regarding traffic, transit, and bike/pedestrian safety & mobility that are the subject of the Highway 1 Safety & Mobility Improvement Studies (Mobility Study), the Midcoast Highway 1 Crossings Project and the soon-to-be-released final draft of Connect the Coastside's Comprehensive Transportation Management Plan. Many years of Midcoast growth without much-needed and long-identified bike/ped safety and mobility improvements have caught up with us now with too many people dependent on their cars and stuck in traffic without safe and convenient alternative transportation. The key challenge to this project is the isolated rural site without adequate transit or bike/ped facilities, leaving residents dependent on their automobiles to reach jobs and services on already congested roads.

## Midcoast Residential Build-out

MCC has consistently advocated for the need to significantly reduce Midcoast residential build-out. The proposed LCP amendment would reduce land use density for this 11-acre parcel from medium-high to medium. Residential build-out numbers currently allocated to the parcel would be reduced by more than half, from 148 to 71 units.

## Affordability and Residency Preference for Local Workers

A stated project objective is to improve the jobs-housing balance in the Midcoast region; however, Midcoast housing far exceeds local jobs. The applicant has stated they would not be legally allowed to restrict housing to those with local jobs, but that a portion of the units will include a preference for households who already live or work in the region. MCC would prefer that the preference apply to all units. Every new residential unit that does not provide affordable housing for our local workforce, adds to our coastal jobs-housing imbalance and traffic congestion.

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<sup>1</sup> <http://www.midcoastcommunitycouncil.org/storage/mtgs-com2017/2017-09-27-MidPen-pre-app-MCC-com.pdf>

The requested amendment to LCP Policy 3.15(d) calls for all units, apart from resident manager's, to serve low- or moderate-income households. Elsewhere in the submittal the project consistently proposes all units restricted to low income (less than 80% AMI). MCC requests that the proposed LCP amendment match the rest of the submittal regarding low income affordability.

San Mateo County AMI is significantly higher than what local Coastside jobs provide. In Half Moon Bay one quarter of households earns less than \$50,000 per year. Please clarify how the proposed income restrictions would provide a Coastside jobs-housing fit.

### **Construction Phasing**

Construction is proposed in one phase, over approximately 18 months. If built in two phases, would there be more opportunity for residents with Coastside jobs to receive preference? Approving more than the annual limit of 40 residential units/year cannot be justified if many of those units will go to residents commuting to jobs out of the area.

### **Public Transit**

The project site is located on the Hwy 1 corridor adjacent to SamTrans Route 17 bus stops at 14<sup>th</sup> & 16<sup>th</sup>. Route 17 directly reaches Coastside job hubs in Half Moon Bay, Princeton, and Pacifica (10 minutes to Linda Mar and 25 minutes to downtown HMB). Current #17 service is hourly on weekdays, and every two hours on weekends. However, on weekdays at this location there is no southbound AM or northbound PM service when #17 is routed via Sunshine Valley Road (SVR). Route #18 has limited weekday service to Middle and High School in HMB but is also routed via SVR. Outside those hours, ridership utilizing SVR bus stops is very low and the more direct route on Etheldore and Highway 1 better serves other riders.

Mitigation TRAF-5B: The applicant proposes to address the safety of pedestrians crossing to the adjacent southbound bus stop at the lighthouse hostel by eliminating it and re-routing all buses via SVR. That would also eliminate the Hwy 1 bus stop at 14<sup>th</sup>, and Etheldore stops at California and Vermont. The closest bus stops to the project would then be 1/2 mile to 7<sup>th</sup>/Main or 3/4 mile to Etheldore/SVR, well outside the 1/4 mile range of convenience.

This proposal ignores the need for safe crossing at lighthouse/16<sup>th</sup> for the Coastal Trail, and inefficiency of SVR during non-school hours and travel direction. In order to serve the project, it would be better to keep the adjacent bus stop at the lighthouse hostel and explore re-routing all Route 17 trips to Hwy 1 and Etheldore, and leaving Route 18 to serve school riders on SVR.

This project highlights the urgent need for expanded Coastside public transit. Without convenient school and commuter bus service at this location on the highway corridor, or a project-sponsored shuttle to and from local jobs, this project cannot be justified.

### **Bike/Pedestrian Safety & Mobility**

For pedestrian safety, Mitigation TRAF-5A proposes a sidewalk connection between the project entrance on Carlos to the north side of Sierra Street.

The need for safe highway crossing at the lighthouse/16<sup>th</sup> cannot be brushed aside by saying there is no need for residents to cross the highway because the bus stop has

been removed. East side residents, workers and visitors all need to be able to conveniently walk or bike to the west side for recreation. Two crossing concepts for the lighthouse/16<sup>th</sup> were included in the 2012 Mobility Study – a raised median refuge island for 2-stage crossing and an overcrossing to the south where the road cut makes that feasible. The proposed project, with a significant number of new bike/ped/transit users, makes a safe crossing urgent.

If this housing project is to proceed, the Parallel Trail segment in this area must be prioritized and implemented, at a minimum between downtown Moss Beach and 14<sup>th</sup> St. Creating a bike/pedestrian-friendly community and calming highway traffic will help draw the kind of neighborhood commercial businesses needed to serve existing and future residents.

### **Vehicle Highway Access & Safety**

**Carlos:** Mitigation TRAF-2B proposes to decrease hazards by closing Carlos St north of the project entrance to all vehicles except emergency services. The Mobility Study and Connect the Coastside show this intersection as right turn only entering the highway and continued use of the center left turn lane eastbound into Carlos. Traffic counts show significant existing peak hour traffic from Sierra and Stetson using this route, which should remain available. Feasibility of re-routing Carlos to 16<sup>th</sup> for safer vehicle highway access needs further analysis. It is insufficient to say it is not feasible due to grading requirements and Level of Service (LOS) impact on 16<sup>th</sup> St, which has only three residences.

**Valleamar/Etheldore and lighthouse/16<sup>th</sup>:** Mitigation TRAF-3B proposes to address LOS by restricting peak hour left turns entering the highway at Etheldore/Valleamar. Left turns would be reassigned to Calif/Wienke. This would be a significant re-route for Valleamar which does not connect directly to Wienke and would add trips to that complicated 5-way intersection. As long as there is lane space on Valleamar so that left-turning vehicles do not block those turning right, turning movements should not be restricted simply to achieve a better LOS rating. A similar right-turn-only restriction proposed for lighthouse/16<sup>th</sup> during PM peak period seems unnecessary to address LOS at that very lightly used intersection.

**California/Wienke:** Mitigation TRAF-1A proposes to address LOS by converting intersection control at California/Wienke to roundabout or signal, to be determined by ICE study required by Caltrans. California meets the signal warrant under existing conditions. Additional project trips at this intersection should be re-calculated for keeping Carlos open and should also consider that all new and re-assigned traffic will not necessarily use California for highway access. When a queue builds, motorists often choose among the three other adjacent intersections to spread out the wait time to enter the highway.

MCC and the community are adamantly opposed to any more traffic signals in the Midcoast. A signal at California, stopping highway traffic, and added pollution-spewing stacking lanes further splitting our town, would destroy the community vision for a context appropriate village circulation plan as was outlined in the Safety & Mobility Study. A roundabout at each end of Moss Beach would calm traffic without stopping it, provide safe pedestrian crossings, and convenient U-turns to avoid making left turns onto the highway, improving LOS at all intersections.



## Discrepancies in submittal documents

### Consistency Evaluation

Table 1, LCP Policies:

Policy 3.16(a)

- *"limits the number of building permits in any 12-month period to 60".*  
Correction: not building permits, but affordable housing units.

Policy 3.3:

- *"A portion of units in the project will include a preference for households who already live or work in the region."*  
Other references in the application make no mention of limiting this preference to a portion of the units. Please clarify.
- *"According to census data compiled in 2016, the three adjacent communities of Montara, Moss Beach, and El Granada – all of which are within 6 miles of the project site – contain 1,364 jobs."*  
Does this include jobs in Princeton and unincorporated Miramar?
- *"The project is within 1/4 mile walking distance of the Coastsides Market grocery, Moss Beach Park, Farallone View Elementary School, and the Seton Coastsides Medical Center."*  
Correction: Coastsides Market (a liquor/convenience store) and Moss Beach Park 1/2 mile, Farallone View School 1 mile, Seton Medical Center 1.2 miles.

Table 4 Community Plan 7.2(b):

- *"The project would consist of two-story buildings with roof heights varying between 32 and 36 ft."*  
This conflicts with PUD-124, #5: *"No structure shall exceed two stories or an average height of 25 ft."*  
Adherence to the lower height limit will help with neighborhood visual compatibility.

### Cumulative Impacts Analysis

Table 3 – List of Reasonably Foreseeable Projects

- HMB and Pacifica included comprehensive list with single-family dwellings. SMC unincorporated Midcoast includes only Big Wave, Harbor Village RV, 7<sup>th</sup> St Hotel, Main St Hotel. The mixed-use building at Hwy 1/Virginia and the many Midcoast single-family dwellings in the permitting process should be included.

Table 4&5 -- Population & Housing Units

- Pacifica and HMB are included, but the Midcoast is represented by only Montara and Moss Beach. El Granada, Princeton, and Miramar should be included.

Hwy 1 Moss Beach 50 mph speed limit is consistently misreported:

### Responses to Workshop Comments

#3 Traffic: *"combination of conditions that include 55 mph speed limits..."*

#8 Pedestrian Traffic: *"operational challenges due to the 55 mph speed limit..."*

Traffic Impact Analysis, p.33: *"a 55-mph facility such as Highway 1"*

Thank you for the opportunity to comment.

## Rexing, Stephanie@Coastal

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**From:** Liz Pearlson <lizanah@sbcglobal.net>  
**Sent:** Saturday, January 25, 2020 4:26 PM  
**To:** dhorsley@smcgov.org  
**Cc:** mschaller@smcgov.org; Rexing, Stephanie@Coastal; Martinez, Erik@Coastal; cgroom@smcgov.org; wslocum@smcgov.org; mossbeach@midpenhousing.org  
**Subject:** Moss beach development

Dear Supervisor Horsley,

I am writing to you regarding my concern over the proposed housing development by mid pen in moss beach. I was at the recent meeting regarding the zoning change on Wednesday evening at the library.

I alongside many of my fellow residents have grave concerns about the inappropriateness of this chosen location for such a housing project. We do not have the infrastructure to handle this large of a development. I read the transportation and traffic report and it uncovered many problems regarding traffic, access, and public transportation. I was horrified to read in this report the suggestion that residents be encouraged not to use the bus stop across the street because it is too dangerous to get to. The report stated the residents should be told to use the bus top ten minutes walking distance up the highway! Isn't the whole point of a low income housing development to be near public transportation? Not to mention jobs, stores, healthcare, etc.

How are people going to get to work? School? With limited access to public transportation. Is adding 300 plus more cars to our neighborhood a good idea when we only have one road in and one road out to evacuate in a time of crisis like a fire or an earthquake?

Getting out of this neighborhood onto highway one is already dangerous. Making a right hand turn off of Carlos to highway one is risky now. How is this going to work for residents?

Furthermore, apparently only 50% of the units will go to local residents who live and work here! How is this helping our local community?

I do understand the history of this piece of land being set aside for higher density housing but that was during a time when a four lane highway was being considered through the back of moss beach/montara . That obviously never happened as the tunnel was chosen . So this development does not make sense anymore. The access hasn't changed or grown.

I am urging you to reconsider this plan for another location. This does not make sense and the neighborhood is not behind you. People are really upset and concerned.

Sincerely,  
Elizabeth Pearlson  
Moss Beach Resident

**LAW OFFICES OF BRIAN GAFFNEY, A Professional Corporation**

446 Old County Road, Suite 100-310

Pacifica, California 94044

(650) 219 3187 Phone

[brian@gaффneylegal.com](mailto:brian@gaффneylegal.com)

January 22, 2020

*Via Email*

*15 Copies at Commission Hearing*

San Mateo County Planning Commission

[planning-commission@smcgov.org](mailto:planning-commission@smcgov.org)

[mschaller@smcgov.org](mailto:mschaller@smcgov.org)

RE: MidPen Housing proposed Cypress Point project  
PLN2018-00264

Dear Commissioners Hansson, Gupta, Santacruz, Ramirez and Ketcham,

This office represents Resist Density regarding the proposed Cypress Point project in Moss Beach. Based on review of the Staff Report and Attachments prepared for the January 22, 2020 Planning Commission Hearing, and as explained in greater detail below, Resist Density offers the following comments regarding the County's review of this proposed project.

- 1) San Mateo County must conduct environmental review of the discretionary approvals the County will consider for the project;
- 2) Review by the Coastal Commission is limited to conformance with the Coastal Act and project impacts to coastal resources;
- 3) The County has failed to follow its own Zoning Regulations in review of the proposed project;
- 4) The Staff Report and its Attachments do not adequately analyze environmental impacts and mitigations;
- 5) The proposed project is inconsistent with the Coastal Act and the San Mateo County LCP.

Thank you for your careful consideration of these comments and others by the public.

Sincerely,



Brian Gaffney

**I. San Mateo County Must Conduct Environmental Review of the Discretionary Approvals the County Will Consider for the Project.**

The proposed Cypress Point project includes proposed amendment to the San Mateo County General Plan to change the land use designation of APN 037-022-070, amendment to the County's Zoning Map, amendment of the County's zoning text, and creation of an entirely new Planned Unit Development (PUD) designation for the project site. Each of these proposed changes are discretionary acts which the County may or may not approve.

In addition, the proposed project includes an amendment to San Mateo Local Coastal Program (LCP) Policies 3.15(b) and 3.15(d.1), and amendment of the LCP Land Use Plan Map. If the San Mateo County Board of Supervisors approves the proposed changes to the LCP, these LCP amendments will need to be subsequently certified by the California Coastal Commission. The approval of the LCP amendments by the California Coastal Commission is exempt from the requirement to prepare an EIR, but not exempt from CEQA's substantive requirements. (Pub. Res. Code §§ 21080.5, 21080.9)

The County is required to conduct its own environmental review of the discretionary approvals the County will consider for the project, and can not rely upon the Coastal Commission's compliance with CEQA. Further, the County must not defer its environmental review until subsequent review of a Coastal Development Permit (CDP).

First, MidPen's proposed project requires more than changes to the LCP. The proposed project will also require amendment to the San Mateo County General Plan, amendment to the County's Zoning Map and the County's zoning text, and proposed changes to the Planned Unit Development (PUD) designation for the project site.

MidPen's proposed general plan amendment is undoubtedly a discretionary action subject to environmental review under CEQA. In *DeVita v. Cty. of Napa*, 9 Cal. 4th 763, 793-94 (1995), the California Supreme Court explained that

General plans "embody fundamental land use decisions that guide the future growth and development of cities and counties," and amendments of these plans 'have a potential for resulting in ultimate physical changes in the environment.' General plan adoption **and amendment** are therefore properly defined in the CEQA guidelines (Cal. Code Regs., tit. 14, § 15378, subd. (a)(1)) as projects subject to environmental review."

"Because general plans embody fundamental land use decisions that guide future growth and development of cities and counties, they have the potential for resulting in ultimate physical changes in the environment. ...[W]hen general plan



amendment is among numerous approvals required for a particular development project, the question is the effect of that development on the environment].” *Black Prop. Owners Assn. v. City of Berkeley*, 22 Cal. App. 4th 974, 985 (1994).

So too, because the changes to the County’s Zoning Map and text are discretionary actions which will cause direct physical environmental changes or reasonably foreseeable indirect physical environmental changes, such zoning amendments are projects subject to CEQA’s mandate of environmental review. (Pub. Res. Code §§ 21080, 21065; *Union of Med. Marijuana Patients, Inc. v. City of San Diego*, 7 Cal. 5th 1171, 1199 (2019). Approval of these zoning changes will facilitate building the proposed project - resulting in direct and indirect physical changes in the environment, many of which MidPen itself admits will be significant adverse impacts.

While a “Local Coastal Program” includes a local government’s land use plans, zoning ordinances, and zoning district maps, not all such plans and zoning constitute the LCP. By statute it is only those plans and zoning which “implement the provisions and policies” of the Coastal Act at the local level.” (Pub. Res Code 30108.6.) Here, there is no showing the general plan amendment and zoning changes implement the Coastal Act.

Likewise, the creation of an entirely new Planned Unit Development designation for the project site, PUD-140, is a discretionary action by the County which will result in foreseeable physical environment changes, i.e. development of the site. Amendment of the PUD is not necessary for amendment of the LCP. In fact, the PUD designation is clearly not part of San Mateo County’s LCP.

For these reasons, adequate environmental review by the County now in the form of a CEQA document is needed for the public, responsible agencies and the County to evaluate the proposed project.

Despite this, the County’s position is that it need not undertake environmental review of its proposed land use changes, or that it can defer analysis until a CDP after the PUD, zoning and general plan have been amended. Consider, however, what happens in the absence of such environmental review. The County has its own independent discretion over whether to grant the general plan amendment, zoning changes and PUD designation. The County appears to be prepared to amend the general plan, amend the zoning, and create the new PUD designation - *without the benefit of environmental review*.

Such a result would clearly violate CEQA - whose guiding mandate is long term protection of the environment and consideration of environmental consequences at the earliest possible stage, even though more detailed environmental review may be necessary later. By chopping the project into two stages – changes to the general plan, zoning and PUD first, followed by the Coastal Development Permit later - the County is engaging in impermissible piecemeal

review. CEQA requires that the whole of the action which has the potential for environmental consequences be reviewed now by the County.<sup>1</sup>

## **II. Review by the Coastal Commission Is Limited To Conformance with Coastal Act and Coastal Resources.**

The Coastal Commission's review of an LCP amendment is limited to a determination that the amendment is or is not consistent with the coastal zone values cited in Section 30001 of the Act, as well as its conformance with the requirements of Chapter 3 (commencing with Section 30200) of the Coastal Act. (Pub. Res. Code § 30512 – 30514, 30200) Those "Chapter 3 policies" thus represent the standards for judging the adequacy of an LCP. *McAllister v. Cty. of Monterey*, 147 Cal. App. 4th 253, 272 (2007).

Moreover, the Coastal Commission "shall require conformance with the policies and requirements of Chapter 3 (commencing with Section 30200) only to the extent necessary to achieve the basic state goals specified in [Coastal Act] Section 30001.5."<sup>2</sup> (Pub. Res. Code § 30512.2; *Yost v. Thomas*, 36 Cal. 3d 561, 566–67 (1984). Similarly, the Commission may only reject zoning ordinances on the grounds that they do not conform, or are inadequate to carry out the provisions of the certified land use plan (Pub. Res. Code § 30513; *Yost, ibid.*)

As such, the Coastal Commission's environmental review necessarily will not reach to reasonably foreseeable environmental impacts of the proposed project beyond impacts to coastal resources. For example, consideration of traffic impacts may not extend to analysis of traffic impacts to neighborhood streets. Likewise, the adverse impacts of the project on emergency evacuation of Moss Beach may not be reached by the Commission's review – as such impacts while potentially adverse and significant – do not pertain to coastal resources.

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<sup>1</sup> In fact, in applying for loans for the project from San Mateo County, MidPen asserted that project approval would "involve two environmental reviews under CEQA and the Coastal Commission's CEQA-equivalent process. See 1st Quarter 2018 Report to San Mateo County regarding Cypress Point.

<sup>2</sup> Those Coastal Act section 30001.5 goals are  
(a) Protect, maintain, and where feasible, enhance and restore the overall quality of the **coastal zone environment** and its natural and artificial resources.  
(b) Assure orderly, balanced utilization and conservation of **coastal zone resources** taking into account the social and economic needs of the people of the state.  
(c) Maximize public access to and along the coast and maximize public recreational opportunities **in the coastal zone** consistent with sound resources conservation principles and constitutionally protected rights of private property owners.

Therefore, review by San Mateo County of environmental impacts can not be avoided on the assertion that Coastal Commission review will substitute.

**III. The County Has Failed to Follow Its Own Zoning Regulations in Review of the Proposed Project.**

A. The CDP Is Not Being Considered Concurrently with Other Project Approvals.

San Mateo's Zoning Regulation require that an application for a Coastal Development permit "**shall**" be made **prior to or concurrently with** application for any other permit or approvals required for the project by the San Mateo County Ordinance Code. Zoning Regulation 6238.7. Likewise, "to the extent possible, action on a Coastal Development Permit **shall** be taken concurrently with action on other permits or approvals required for the project. Zoning Regulation 6328.9.

Here, however, the County will not follow its own zoning regulations. The County will not consider the CDP until after amending the LCP, General Plan, zoning and PUD. Moreover, the purpose of this impermissible 2-stage review is to avoid analysis of impacts, mitigation measures and alternatives until the subsequent CDP review.

B. The County Is Not Following the Proper Procedure for Adoption of a New PUD District.

Zoning Regulation 6191 mandates that no PUD District shall be enacted for any area unless and until the Planning Commission shall first have reviewed a precise plan of the subject area and its environs, and found that the proposed zoning of the area would be in harmony with said plan, and would not be in conflict with the County Master Plan, or with any other current land use plan for a sub area of the County previously adopted by the Planning Commission.

1. Review of Conceptual Not Precise Plans.

The Planning Commission will not review a precise plan of the subject area and its environs. In fact, proposed PUD-140 only refers to "conceptual development plans presented to the San Mateo County Planning Commission on January 22, 2020," a "Conceptual Grading Plan," and a "conceptual landscape plan." Such "conceptual" plans can not constitute the precise plans to be reviewed by the Planning Commission. Thus, the County has not complied with Zoning Regulation 6191.

2. No Evaluation of Conflict With the San Mateo General Plan.

In evaluating compliance with Zoning Regulation 6191, the Staff Report vaguely asserts that "Based on the previous discussion in the LCP Compliance

Section of this report (Section A.2), the proposed PUD Zoning District regulations, for this parcel, are in harmony with applicable LCP policies. Section A.2 is a purported evaluation of the Consistency of Zoning Amendments with the San Mateo County Local Coastal Program Land Use Plan.

Neither in Section A.2 nor under compliance with Zoning Regulation 6191 does the County evaluate consistency of the proposed project with the San Mateo General Plan and its various policies.

3. No Evaluation of Conflict With the Montara-Moss Beach-El Granada Community Plan.

According to the San Mateo County General Plan, the project site is located in the Montara-Moss Beach El Granada community plan area. See Attachment H to the January 22 Staff Report. The County adopted the Montara-Moss Beach-El Granada Community Plan which in 1978. According to the General Plan such Plans are “part of the General Plan and contain more specific policies for certain geographic areas.” The San Mateo County General Plan explains that “Area Plans allow for more local application of General Plan element policies.” Despite this, the Planning Commission has not evaluated the proposed project’s compliance with the Montara-Moss Beach-El Granada Community Plan.

**IV. The Staff Report and its Attachments Do Not Contain Adequate Environmental Review.**

Aside from the need for the County to conduct its own environmental review, the County’s submission of a proposed LCP Amendment to the Coastal Commission must include complete environmental review. Coastal Commission review of LCP amendments must comply with the substantive requirements of CEQA - even where an EIR is not prepared.

As detailed below, neither MidPen nor County staff have provided analysis of the proposed project that complies with CEQA. Thus, the San Mateo Planning Commission is in the untenable position of making recommendations without knowledge of the proposed project’s adverse impacts and potential mitigations. In addition, the County is not meeting CEQA’s purpose to demonstrate to an apprehensive citizenry that the agency has in fact analyzed and considered the ecological implications of the proposed project.

A. The Environmental Setting is Improper.

First, the California Supreme Court has repeatedly made it clear that in evaluating impacts of a proposed project, the baseline for a significance determination should normally be the existing physical conditions in the project's vicinity, not what was allowed under existing permits. (*Communities For A Better Environment v. South Coast Air Quality Management Dist.* (2010) 48 Cal.4th 310, 320-



322; *Ctr. for Biological Diversity v. Dep't of Fish & Wildlife*, 62 Cal. 4th 204, 224 (2016).

So here, it is important that the County's evaluation of the proposed project look at the traffic, sewage, discharge, public safety, biological and other impacts based on a baseline of undeveloped, de-facto open space, rather than comparing it to the existing but never implemented PUD-124 zoning for the site.

Instead, the County evaluates evacuation and circulation, protection of coastal resources, compliance with the Coastal Act, impacts to archeological resources, vehicle miles traveled, erosion, traffic and cumulative traffic - by impermissibly pointing to the PUD-124 density rather than the existing setting as the baseline. On that skewed basis the County asserts that the proposed project will reduce impacts.

Second, the Staff Report and its Attachments are flawed where they fail to describe the physical environmental conditions in the "vicinity of the project," as required by CEQA Guideline 15125. For example, the "Biological Resource Assessment" at Appendix G states only that the project site does not contain habitat for the California red legged frog, and fails to describe if this federally threatened species exists in the adjacent Montara Creek, or if the area is within the critical habitat designation for the species.

Third, the County's evaluation of existing conditions is also flawed as it fails to mention or otherwise account for the environmental review conducted in 1985 on the same site for a different project. That County environmental document recognized the site as "prairie grassland," which include a native beach strawberry on the project site - which is classified as "locally unique" species in the San Mateo County LCP. The 1985 review also identified Montara Creek as within 50 feet of the project site. These facts are omitted from the Staff Report and its Attachments.

B. There is No Analysis of Emergency Evacuation and Public Safety Impacts.

The project site is located within a Community at Risk zone according to the San Mateo County's Wildland Urban Interface Fire Threatened Communities Map.<sup>3</sup> In addition, there has been no evidence by MidPen that there is enough water to fight a fire in the surrounding hillsides. There is only one road in and out of the proposed project site, and limited roads serving Moss Beach - all of which lead to Highway 1 only. The proposed project - by adding a minimum of 142 new vehicles

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<sup>3</sup> See also California Public Utilities Commission's Fire Threat Interactive Maps at [http://cpuc\\_firemap2.sig-gis.com/#](http://cpuc_firemap2.sig-gis.com/#) **and** [https://ccag.ca.gov/wp-content/uploads/2019/03/6.5-Community-Wildfire-Safety-Program-Overview\\_San-Mateo-County\\_20190314.pdf](https://ccag.ca.gov/wp-content/uploads/2019/03/6.5-Community-Wildfire-Safety-Program-Overview_San-Mateo-County_20190314.pdf).

(i.e. the number of un-covered parking spaces) to this tightly constrained area of Moss Beach – decreases traffic circulation in the event of an emergency.

Public health and safety are of great importance in CEQA. (Public Resource Code §§ 21000, 21001, 21083.) An agency must evaluate any potentially significant impacts of locating development in other areas susceptible to hazardous conditions including wildfire risk areas “as identified in authoritative hazard maps, risk assessments or in land use plans addressing such hazards areas.” CEQA Guideline 12126.6(a). “[W]hen a proposed project risks exacerbating those environmental hazards or conditions that already exist, an agency must analyze the potential impact of such hazards on future residents or users.” *California Bldg. Indus. Assn. v. Bay Area Air Quality Mgmt. Dist.*, 62 Cal. 4th 369, 377 (2015). “CEQA calls upon an agency to evaluate existing conditions in order to assess whether a project could exacerbate hazards that are already present.” *Id.* at 388.

Despite this there is no analysis of the Project's impacts regarding emergency evacuations in the event of a wildfire or other emergency.

C. There is No Analysis of Storm Water Runoff Impacts to Montara Creek and the Fitzgerald Area of Specific Biological Significance.

The 1985 EIR for a different project on the same site found that Montara Creek is located approximately 50 feet north of the project site. The Montara Creek riparian corridor is an Environmentally Sensitive Habitat Area (ESHA) as defined by the San Mateo County LCP. According to the Staff Report, the project site slopes from 189 MSL along the easterly boundary to 77 feet MSL at the northwest corner.

The hydromodification report prepared by BKF on May 2, 2018 – and excluded from the Staff Report to the Planning Commission – reveals that surface runoff will discharge to Montara Creek within the Fitzgerald Area of Specific Biological Significance:

The existing site slopes range from 10% to 50% with the high point on the east side of the property and the low point at the northwest corner. There is no existing storm drain, sanitary sewer or known gas infrastructure on the property. Storm water runoff is assumed to percolate on site and excess runoff surface flows towards Carlos Street and 16th Street, ultimately discharging to Montara Creek within the James V. Fitzgerald Area of Specific Biological Significance (ASBS) watershed area. Beside the 11 acre property, an additional 1 acre of offsite runoff drains through the project site and contributes to the overall tributary drainage area.

Based on the increase in impervious surfaces with the proposed project, the increased flows off-site of storm water runoff, and project grading and demolition of existing buildings, Resist Density believes it reasonably likely that there will be

increased storm water discharges to Montara Creek. Even assuming the retention basins are adequately sized (the Staff Report does not mention retention basins), during the construction phase and immediately thereafter, these increased flows will likely discharge significant additional sediment levels into Montara Creek, the James V. Fitzgerald Area of Specific Biological Significance (ASBS), and the wetlands at the Pacific Ocean. In addition, if asbestos or other hazardous substances are present on this site, the discharges to the Creek, the ASBS and the wetlands may also contain these hazardous substances.

Despite this, the Staff Report and its attachments avoid any analysis of storm water runoff and project hydromodification, nor the biological impacts or water impacts of such reasonably foreseeable discharges.

D. The Analysis of Traffic Impacts is Flawed.

1. Failure to Consider Construction Phase Impacts.

There has been no analysis of the traffic (and air quality) impacts of over 690 construction-phase truck trips to import 7,000 cubic yards of fill (MCC May 22, 2019 comment). CEQA requires all phases of a project be reviewed for environmental impacts, including the construction phase. There has been no analysis of the impacts of these trips either on Highway 1 traffic or on local roads.

2. Failure to Address Traffic Concerns Raised by Caltrans.

MidPen's Cypress Point Traffic Impact Analysis (April 2019) fails to address issues raised by California Department of Transportation's (Caltrans) August 29, 2018 letter regarding this proposed project, 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.

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.

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 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 believes [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. Impacts must be analyzed before project approval so that the public and agencies such as Caltrans can understand the effects, and so 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 Vehicle Miles Travelled (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 Lead agency monitoring and enforcement,” (2) TDM “annual monitoring reports by an onsite TDM coordinator,” (3) if VMT goals are 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, nor 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 mitigation plan – which ignores Caltrans’ suggestions - can “not” be guaranteed.

E. There Has Been an Inadequate Analysis of Project Impacts from Hazardous Materials.

MidPen’s April 2019 submission included a Phase I Environmental Site Assessment and a Limited Phase II Subsurface Investigation. Those reports have not been presented to the Planning Commission.

Lead was detected at concentrations between 4.5 and 230 mg/kg in surface soils. Diesel petroleum was detected at a concentration of 1.3 mg/kg. Metals, including arsenic, barium, chromium, cobalt, copper, molybdenum, nickel, vanadium, and zinc, were detected at concentrations between 1.0 and 44 mg/kg. Total hexafurans were detected at a concentration of 2.78 picograms/gram. Further soil sampling has been recommended to further assess the horizontal extent of lead-impacted surface soils around 2 identified locations.

MidPen’s environmental evaluation doesn’t opine on whether the soil contamination constitutes a significant impact or not, but does reveal that the transport and use of hazardous materials during construction of the proposed project would be a significant impact requiring mitigation.

Assessment for the presence of asbestos containing materials inexplicably was determined to be “out of [the] scope” of MidPen’s Phase I report. However, asbestos materials were commonly used for buildings constructed in the 1940s. Most of the building foundations are still present on the project site and the site appears to be littered with building materials. In fact, a November 1989 letter to the

owner of the project site reveals that there was asbestos abatement, and states that additional asbestos containing materials were detected in other areas of the property. Despite this, the project site apparently has not been tested for asbestos in soil and groundwater by MidPen or the County. Such testing should be conducted as part of a proper evaluation of potential impacts prior to approval of requested zoning, GP and PUD amendments.

Despite the presence of these hazardous materials, there has not been an analysis of whether the impacts are likely significant.

MidPen's preliminary evaluation promises a "Site Management Plan" will later be developed, but no details are provided regarding what standards this plan will meet or whether the Plan will bring impacts to a level of insignificance.

MidPen proposes to impermissibly defer analysis of existing building pad asbestos until after project approval. That analysis by law should occur before consideration of project approvals.

F. The Biological Assessment at Attachment G Is Inadequate.

The 1985 EIR for another project at the same site recognized project biological impacts including (1) removal of locally unique beach strawberry, (2) removal of coastal prairie grassland, (3) removal of approximately 33 existing trees, and (4) detrimental impacts on the remaining Monterey pines by directly destroying roots and compacting soils. None of these impacts are disclosed by the Staff Report or the Biological Assessment at Attachment G thereto.

Further, as discussed above, the Staff Report and Attachment G do not discuss impacts to Montara Creek, the Fitzgerald ASBS or wetlands at the Ocean, or impacts to California red-legged frogs in the Montara Creek riparian area.

G. The Analysis of Aesthetic Impacts Does Not Consider the Height of the Proposed Project in Evaluating Consistency with Community Scale and Character.

It is undisputed that Midcoast standards limit building maximum height to 28 feet. MidPen has proposed 36 feet, but the County's proposed PUD-140 designation does not even limit the project to this height, instead using only maximum height of all proposed buildings shall not exceed two stories and shall conform to that shown on the conceptual plans.

There has been no analysis of whether this height will be a significant adverse aesthetic impact. This despite that height limitations are a criteria under the San Mateo County Community Design Manual (San Mateo County 1976).

Further, the County is impermissibly deferring analysis of whether the

project design will conflict with applicable General Plan or Zoning Ordinance provisions. The “mitigation” for this is to conduct the required analysis after the PUD is amended. This procedure turns CEQA on its head by approving the project first, and conducting the analysis of impacts later.

H. The Analysis of Mitigation Measures is Flawed.

CEQA requires analysis of mitigation measures prior to project approval. Yet here the County is prepared to impermissibly defer discussion of mitigation measures until after approval of the LCP, zoning and PUD amendments.

The Staff Report states that it is only “At the time a CDP application for development of the site is being considered, the specific actions that will be taken to address the project’s impact on traffic, safety, and circulation will be identified.”

Similarly, MidPen proposes to push an intersection control evaluation onto Caltrans, to be completed after project approval during the design phase. Likewise, MidPen has impermissibly deferred discussion of mitigations in its proposed Mitigation Measures TRAF-1A and TRAF-1B. TRAF-1B consists of a vague “Transportation Demand Management plan” which will not even be formulated for public review 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. This poorly thought through measure includes one grocery cart that residents would walk one-mile round-trip coming back up a steep street, as little as one car share parking space, bus schedules, and the illusory “additional measures that may become available.” As MidPen is forced to acknowledge, the effectiveness of this plan can “not” be guaranteed.

The traffic report avoids any consideration of the traffic impacts of proposed restrictions on traffic movements (roundabouts, new signal lights, closing Carlos St., left turn restrictions) proposed as mitigations. Under CEQA, impacts of proposed mitigations themselves must be analyzed for potential impacts.

Traffic impacts are called “unavoidable” simply because MidPen and the County have not undertaken an adequate analysis of potential mitigation measures.

I. The County Has Not Evaluated Cumulative Impacts.

CEQA requires analysis of cumulative impacts – i.e. the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects. CEQA Guideline 15355. The Coastal Act and Coastal Commission regulations likewise require an analysis of the potential significant adverse cumulative impacts on coastal resources and on public access to or along the coast,



due to existing and potentially allowable development proposed in the LCP. 14 CCR § 13511, subd. (b); Coastal Act 30250.

The Staff Report and Attachments have not even included a cumulative impact analysis in its submission to the Planning Commission.

**V. The Proposed Project is Inconsistent with the Coastal Act and the San Mateo County LCP.**

Even with the inadequate environmental review MidPen has submitted to date, it is clear that that the proposed project is inconsistent with the Coastal Act and the San Mateo County LCP.

**A. Traffic Impacts.**

The proposed project will result in increased congestion and negative traffic impacts in violation of the Coastal Act and the San Mateo County Local Coastal Plan.

The proposed project will result in numerous significant “and unavoidable” traffic impacts:

- 1) Project traffic will critically delay traffic at Highway 1 and Carlos Street- the main access point to the Project from Highway 1. The project will make turns into and out of Carlos Street, as well as through traffic on Highway 1, substantially more hazardous.
- 2) Project traffic will critically delay traffic at Highway 1 and California/Wienke.
- 3) Project traffic will critically delay traffic at Highway 1 and the intersection of Vallemar and Etheldore.
- 4) Project traffic will critically delay traffic at Highway 1 and 16th Street.

There has been no analysis yet of vehicle miles traveled.

There has not been adequate consideration of cumulative traffic impacts which takes into account traffic from tourism, the Big Wave project, Best Western Hotel Half Moon Bay, Pacific Ridge, Mavericks Multiplex and other approved and reasonably foreseeable projects.

**B. Public Access.**

The proposed project will adversely impact public access to the coast and coastal resources in violation of the Coastal Act and the San Mateo County Local Coastal Plan.

Pedestrians crossing Highway 1 to access the coast or public transit are at great risk of being hit by oncoming traffic.

Since the Project will likely increase the pedestrian demand for crossing

State Route 1 at an unmarked crossing location with inadequate sight distance, the Project will increase the hazard for this crossing, resulting in a significant impact.

C. Community Character.

Pursuant to LCP 3.13, new development providing significant housing opportunities for low and moderate income persons must contribute to maintaining a sense of community character by being of compatible scale, size and design. So too, under Coastal Act section 30251, permitted development must be visually compatible with the character of surrounding areas.

Here, in contrast, the County is prepared to approve building height out-of-character with the surrounding community, and defer analysis of design compatibility until after amendment of the LCP.

D. Discharge to Montara Creek and the Fitzgerald Area of Specific Biological /Significance.

Discharge of storm water runoff to Montara Creek and the Fitzgerald ASBS may violate Coastal Act provisions providing “special protection” to areas and species of special biological significance. Coastal Act section 30230 & 30240. Marine resources and the biological productivity of coastal waters must be sustained. Id. Runoff is required to be controlled and alteration of natural streams must be minimized. Coastal Act section 30231.

In addition, Coastal Act section 30253(b) requires that new development neither create nor contribute significantly to erosion of the surrounding area or in any way require the construction of protective devices that would substantially alter natural landforms. Discharge of storm water into Montara Creek and the Fitzgerald ASBS raises serious concerns about whether this discharge over time will lead to erosion or alteration of natural landforms.

Neither MidPen nor the County has conducted the analysis to ensure that these Coastal Act provisions are adhered to. Instead, the project hydromodification report has been withheld from the Staff Report to the Planning Commission.

E. Minimizing Risks in Areas of High Fire Hazard.

The Coastal Act requires that new development minimize risks to life and property in areas of high fire hazard. As discussed above, the project site is located within a Community at Risk zone. There is only one road in and out of the proposed project site, and limited roads serving Moss Beach – all of which lead to Highway 1 only. The proposed project - by adding a minimum of 142 new vehicles (i.e. the number of un-covered parking spaces) to this tightly constrained area of Moss Beach – decreases traffic circulation in the event of an emergency.

F. Development Limited to 40 Units / Year in the Midcoast.

The Local Coastal Plan limits the number of new dwelling units built in the urban Midcoast to a maximum of 40 units per year. The reason for this limit is to ensure that roads, utilities, public works facilities and community infrastructure are not overburdened by rapid residential growth.

To date, there is no comprehensive transportation management plan for this area, and there is no evidence that sewage pipe reliability is adequate to avoid sewage overflows and water quality violations. In fact, over 100 sewage spills have occurred since 2011 according to review of public records. Even without MidPen's proposed development, the sewage pipe system serving this area has been grossly inadequate during storm events. Over 557,103 gallons of raw sewage have spilled into the Pacific Ocean and Half Moon Bay – almost entirely because of structural pipe failures. Further, tens of thousands of gallons of inadequately treated sewage has been released onto streets in residential neighborhoods within the City of Half Moon Bay, El Granada, Montara, Miramar, Moss Beach, and Princeton by the Sea.

The Project – as currently proposed – will add new sewage lines which only exacerbate the serious existing sewage problems. There is no evidence that sewage pipe reliability is adequate to avoid sewage overflows and water quality violations.

There has been no showing that the proposed project will be served with adequate water supplies and wastewater treatment facilities. LCP 1.19.

G. The Proposed Project Violates the Coastal Act Provisions Against Leap Frog Development.

The Coastal Act requires that new residential development must “be located within, contiguous with, or in close proximity to, existing developed areas able to accommodate it”, and “where it will not have significant adverse effects, either individually or cumulatively on coastal resources.” Coastal Act section 30250. It is clear that the traffic, public access, emergency evacuation, hazardous material, and discharge impacts of the proposed project are likely to have significant adverse impacts, and that after years of preparation neither MidPen nor the County are willing to engage in necessary analysis of impacts and mitigations for the project. Numerous traffic impacts are undoubtedly unavoidable. Thus, the project violates the Coastal Act.

Also, where as here, existing or planned public works facilities can accommodate only a limited amount of new development, services to coastal dependent land use, essential public services and basic industries vital to the economic health of the region, state, or nation, public recreation, commercial recreation, and visitor-serving land uses shall not be precluded by other development. 30254. Yet, this proposed project precludes basic traffic, sewage, and water services to other developments.

#### H. Impediments to Public Participation.

San Mateo County has informed the public for close to a year that “the next opportunity for public input will be when the project is formally brought before the Midcoast Community Council for their consideration and recommendation at a later date.” See <https://planning.smcgov.org/cypress-point-affordable-housing-community-project>.

Yet, the project is now before the San Mateo Planning Commission without consideration by the Midcoast Community Council. In so doing, MidPen and San Mateo County have not provided the public maximum opportunity to participate in the LCP amendment process, as required by Coastal Act section 30503.

#### Conclusion

For the reasons above, the proposed Cypress Point project will not (1) protect, maintain and enhance the overall quality of the coastal zone environment and its resources, (2) assure orderly, balanced utilization and conservation of coastal zone resources taking into account the social and economic needs of the people, or (3) maximize public access to and along the coast. Coastal Act § 30001.5



## Midcoast Community Council

*An elected Advisory Council to the San Mateo County Board of Supervisors representing Montara, Moss Beach, El Granada, Princeton, and Miramar*

PO Box 248, Moss Beach, CA 94038

<http://www.MidcoastCommunityCouncil.org>

Len Erickson, Chair  
Michelle Weil, Vice Chair  
Claire Toutant, Secretary  
Tamar Powell, Treasurer  
Barbra Mathewson  
Dan Haggerty  
Dave Olson

Date: January 7, 2020

To: Michael Schaller, Project Planner

From: Len Erickson, Midcoast Community Council, Chair

Re: **Proposed 71-Unit Cypress Point Affordable Housing Community on 11 acres at Carlos & Sierra St, Moss Beach – APN 037-022-070**

Dear Michael,

In 2018 and 2019 the MCC held public discussions on the Cypress Point project and submitted three referrals with approved comments. To avoid confusion and to insure all three letters are on the record, I am including them in this single document:

- 2019-05-22-CypressPt-referral-MCC
- 2018-09-26-CypressPt-referral-MCC
- 2018-08-22-CypressPt-referral-MCC-rev2

Please ensure that this document with the three referrals is included in the staff report for the project.

Midcoast Community Council  
s/Len Erickson, Chair

# Midcoast Community Council

*An elected Advisory Council to the San Mateo County Board of Supervisors  
representing Montara, Moss Beach, El Granada, Princeton, and Miramar*

P.O. Box 248, Moss Beach, CA 94038-0248 - [www.MidcoastCommunityCouncil.org](http://www.MidcoastCommunityCouncil.org)

**Claire Toutant** **Len Erickson** **Dave Olson** **Barbra Mathewson** **Dan Haggerty** **Michelle Weil** **Tamar Powell**  
Chair Vice-Chair Secretary Treasurer

Date: May 22, 2019  
To: Michael Schaller, Project Planner  
Cc: Supervisor Don Horsley  
Steve Monowitz, Community Development Director  
From: Midcoast Community Council/ Claire Toutant, Chair  
Subject: Cypress Point LCP Amendment and PUD zoning change – PLN2018-00264,  
APN 037-022-070

The following comments are made with respect to the updated application documents, submitted on April 15, 2019. They are a followup to comments submitted on August 22, 2018 and September 26, 2018.

In the updated Cover Letter, in response to earlier MCC comments, it states:

The proposed live-work preference for the project will ultimately be determined by San Mateo County.

In earlier meetings and documents, the preference for renters who work in the area was said to be part of the MidPen Housing application process. Please clarify how the County will determine this, and under what process.

In the Policy Consistency Evaluation document, it states:

The project would consist of two-story buildings with roof heights varying between 32 and 36 feet. Considering the elevation of the project site and existing on site trees to be retained, the project would not appear out of scale with the community.

Related statements are made in the Aesthetic Visual Resources document in sections 2 and 6, with both sections stating "Less than Significant Impact".

The MCC disagrees, and regards this as a Significant Impact.

As the MCC has stated many times in the past, we believe that building heights above 28 feet are a problem for the Midcoast, impacting views, and increasing perception of high mass in developments. This is particularly true with 18 buildings in close proximity.

We request that the maximum height be limited to 28 feet to be consistent with existing Midcoast standards. This could easily be done by having a lower pitched roof than is shown in the preliminary design drawings. There is no need for a 4 in 12 slope roof in this area, and many homes have

significantly lower slopes. The comparison to the height of the existing water tanks is not relevant, in our opinion.

Please list all the changes proposed to the PUD Zoning for this parcel.

In the Energy Report, in the Impact Analysis section, is this paragraph:

#### CONSTRUCTION ENERGY USAGE

Project construction would require site preparation, site grading and excavation, trenching, interior architectural finishing, paving and landscaping. Construction would be typical for the region and building type, and the project site does not include unusual building challenges that would require unusually high energy usage. The importation of a maximum of 7,000 cubic yards of fill material would be required, which would result in a maximum of 692 haul truck trips, as indicated in the California Emissions Estimator Model (CalEEMod) modeling estimates in the Air Quality Technical Report.

We are concerned about the amount of fill, and particularly the number of haul truck trips to bring it to the site. We would suggest a design change to minimize the amount of fill required for the project, and if at all possible, to use cut and fill methods, rather than importing fill.

In the Cumulative Impacts document, it appears that it is out of date, missing current and planned projects in Moss Beach. It also appears that the Big Wave project is not included. The lack of details makes it hard to check. It would be helpful if the projects in the Midcoast were listed in an appendix to this document.

With respect to the updated evaluation of traffic impact and mitigation, we appreciate the inclusion of transportation alternatives, and discussion of roundabouts, rather than just signals. The Council requests that the PUD zoning change not be approved until after Connect the Coastside is finalized and approved by the Coastal Commission.

We are also pleased to see that the development will design and build to LEED standards.

MIDCOAST COMMUNITY COUNCIL

s/Claire Toutant, Chair

# Midcoast Community Council

*representing Montara, Moss Beach, El Granada, Princeton, and Miramar*  
P.O. Box 248, Moss Beach, CA 94038-0248 - [www.MidcoastCommunityCouncil.org](http://www.MidcoastCommunityCouncil.org)

**Dave Olson . Claire Toutant . Lisa Ketcham . Dan Haggerty . Chris Johnson . Brandon Kwan . Barbra Mathewson**  
Chair Vice-Chair Secretary Treasurer

Date: September 26, 2018

To: Michael Schaller, Project Planner

cc: Supervisor Don Horsley  
Steve Monowitz, Community Development Director  
Renée Ananda, CCC Coastal Program Analyst

From: Midcoast Community Council/ Dave Olson, Chair

Subject: **Proposed 71-Unit Cypress Point Affordable Housing Community  
on Carlos St, Moss Beach – PLN2018-00264, APN 037-022-070**

Thank you for the additional time to comment on this project referral. The following comments are in addition to those MCC submitted on August 22, 2018 (attached).

## **Hazardous Materials**

- Additional soil sampling should be performed, as recommended in the Phase 2 report, to assess the horizontal extent of lead-impacted surface soils.
- Remnants of 1940's-era buildings should be assessed for asbestos-containing materials, and surface soils should be analyzed for elevated levels of asbestos fibers.

## **Traffic Impacts and the Comprehensive Transportation Management Plan (CTMP)**

It does not serve the community or the project, to attempt to determine key circulation elements for Moss Beach absent an approved long-range Comprehensive Transportation Management Plan (CTMP), aka Connect the Coastside.

- Project traffic impacts and proposed mitigations are analyzed based on existing LOS standards, whereas the March 2016 draft of the long-delayed CTMP proposes a significant revision of LOS standards.
- Project traffic mitigations propose re-routing peak-hour Vallemar highway access to Wienke, whereas the 2016 draft CTMP clearly states Wienke highway access would have to be restricted and an alternate route identified. Vallemar or Wienke are the only access points for a neighborhood of about 75 homes.
- The 2016 CTMP draft proposal of two Hwy 1 traffic signals at California and Cypress galvanized a strong Midcoast preference for roundabouts, which has since been partially addressed with a feasibility study for Cypress. At California/Wienke the 2016 draft CTMP (p. 25) balks at doing any significant study for a roundabout due to the complication of the 5-way intersection, but then acknowledges that a signalized intersection would require re-routing Wienke Way! The community has heard no more on the matter until the Community Development Director's 8/16/18 email which does not bode well: "From our analysis to date, the project will necessitate the installation of a signal and improved crossing at California Ave."



# Midcoast Community Council

*representing Montara, Moss Beach, El Granada, Princeton, and Miramar*  
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**Dave Olson . Claire Toutant . Lisa Ketcham . Dan Haggerty . Chris Johnson . Brandon Kwan . Barbra Mathewson**  
Chair Vice-Chair Secretary Treasurer

Date: August 22, 2018

To: Michael Schaller, Project Planner

cc: Supervisor Don Horsley  
Steve Monowitz, Community Development Director  
Renée Ananda, CCC Coastal Program Analyst

From: Midcoast Community Council/ Dave Olson, Chair

Subject: **Proposed 71-Unit Cypress Point Affordable Housing Community  
on Carlos St, Moss Beach – PLN2018-00264, APN 037-022-070**

Wide public opposition to this project continues unabated, as demonstrated at MCC standing-room-only meeting 8/22/18 to consider this referral.

MCC 9/27/17 comments<sup>1</sup> on the pre-application for this project focused on the many long-standing community concerns regarding traffic, transit, and bike/pedestrian safety & mobility that are the subject of the Highway 1 Safety & Mobility Improvement Studies (Mobility Study), the Midcoast Highway 1 Crossings Project and the soon-to-be-released final draft of Connect the Coastside's Comprehensive Transportation Management Plan. Many years of Midcoast growth without much-needed and long-identified bike/ped safety and mobility improvements have caught up with us now with too many people dependent on their cars and stuck in traffic without safe and convenient alternative transportation. The key challenge to this project is the isolated rural site without adequate transit or bike/ped facilities, leaving residents dependent on their automobiles to reach jobs and services on already congested roads.

## Midcoast Residential Build-out

MCC has consistently advocated for the need to significantly reduce Midcoast residential build-out. The proposed LCP amendment would reduce land use density for this 11-acre parcel from medium-high to medium. Residential build-out numbers currently allocated to the parcel would be reduced by more than half, from 148 to 71 units.

## Affordability and Residency Preference for Local Workers

A stated project objective is to improve the jobs-housing balance in the Midcoast region; however, Midcoast housing far exceeds local jobs. The applicant has stated they would not be legally allowed to restrict housing to those with local jobs, but that a portion of the units will include a preference for households who already live or work in the region. MCC would prefer that the preference apply to all units. Every new residential unit that does not provide affordable housing for our local workforce, adds to our coastal jobs-housing imbalance and traffic congestion.

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<sup>1</sup> <http://www.midcoastcommunitycouncil.org/storage/mtgs-com2017/2017-09-27-MidPen-pre-app-MCC-com.pdf>

The requested amendment to LCP Policy 3.15(d) calls for all units, apart from resident manager's, to serve low- or moderate-income households. Elsewhere in the submittal the project consistently proposes all units restricted to low income (less than 80% AMI). MCC requests that the proposed LCP amendment match the rest of the submittal regarding low income affordability.

San Mateo County AMI is significantly higher than what local Coastside jobs provide. In Half Moon Bay one quarter of households earns less than \$50,000 per year. Please clarify how the proposed income restrictions would provide a Coastside jobs-housing fit.

### **Construction Phasing**

Construction is proposed in one phase, over approximately 18 months. If built in two phases, would there be more opportunity for residents with Coastside jobs to receive preference? Approving more than the annual limit of 40 residential units/year cannot be justified if many of those units will go to residents commuting to jobs out of the area.

### **Public Transit**

The project site is located on the Hwy 1 corridor adjacent to SamTrans Route 17 bus stops at 14<sup>th</sup> & 16<sup>th</sup>. Route 17 directly reaches Coastside job hubs in Half Moon Bay, Princeton, and Pacifica (10 minutes to Linda Mar and 25 minutes to downtown HMB). Current #17 service is hourly on weekdays, and every two hours on weekends. However, on weekdays at this location there is no southbound AM or northbound PM service when #17 is routed via Sunshine Valley Road (SVR). Route #18 has limited weekday service to Middle and High School in HMB but is also routed via SVR. Outside those hours, ridership utilizing SVR bus stops is very low and the more direct route on Etheldore and Highway 1 better serves other riders.

Mitigation TRAF-5B: The applicant proposes to address the safety of pedestrians crossing to the adjacent southbound bus stop at the lighthouse hostel by eliminating it and re-routing all buses via SVR. That would also eliminate the Hwy 1 bus stop at 14<sup>th</sup>, and Etheldore stops at California and Vermont. The closest bus stops to the project would then be 1/2 mile to 7<sup>th</sup>/Main or 3/4 mile to Etheldore/SVR, well outside the 1/4 mile range of convenience.

This proposal ignores the need for safe crossing at lighthouse/16<sup>th</sup> for the Coastal Trail, and inefficiency of SVR during non-school hours and travel direction. In order to serve the project, it would be better to keep the adjacent bus stop at the lighthouse hostel and explore re-routing all Route 17 trips to Hwy 1 and Etheldore, and leaving Route 18 to serve school riders on SVR.

This project highlights the urgent need for expanded Coastside public transit. Without convenient school and commuter bus service at this location on the highway corridor, or a project-sponsored shuttle to and from local jobs, this project cannot be justified.

### **Bike/Pedestrian Safety & Mobility**

For pedestrian safety, Mitigation TRAF-5A proposes a sidewalk connection between the project entrance on Carlos to the north side of Sierra Street.

The need for safe highway crossing at the lighthouse/16<sup>th</sup> cannot be brushed aside by saying there is no need for residents to cross the highway because the bus stop has

been removed. East side residents, workers and visitors all need to be able to conveniently walk or bike to the west side for recreation. Two crossing concepts for the lighthouse/16<sup>th</sup> were included in the 2012 Mobility Study – a raised median refuge island for 2-stage crossing and an overcrossing to the south where the road cut makes that feasible. The proposed project, with a significant number of new bike/ped/transit users, makes a safe crossing urgent.

If this housing project is to proceed, the Parallel Trail segment in this area must be prioritized and implemented, at a minimum between downtown Moss Beach and 14<sup>th</sup> St. Creating a bike/pedestrian-friendly community and calming highway traffic will help draw the kind of neighborhood commercial businesses needed to serve existing and future residents.

### **Vehicle Highway Access & Safety**

**Carlos:** Mitigation TRAF-2B proposes to decrease hazards by closing Carlos St north of the project entrance to all vehicles except emergency services. The Mobility Study and Connect the Coastside show this intersection as right turn only entering the highway and continued use of the center left turn lane eastbound into Carlos. Traffic counts show significant existing peak hour traffic from Sierra and Stetson using this route, which should remain available. Feasibility of re-routing Carlos to 16<sup>th</sup> for safer vehicle highway access needs further analysis. It is insufficient to say it is not feasible due to grading requirements and Level of Service (LOS) impact on 16<sup>th</sup> St, which has only three residences.

**Valleamar/Etheldore and lighthouse/16<sup>th</sup>:** Mitigation TRAF-3B proposes to address LOS by restricting peak hour left turns entering the highway at Etheldore/Valleamar. Left turns would be reassigned to Calif/Wienke. This would be a significant re-route for Valleamar which does not connect directly to Wienke and would add trips to that complicated 5-way intersection. As long as there is lane space on Valleamar so that left-turning vehicles do not block those turning right, turning movements should not be restricted simply to achieve a better LOS rating. A similar right-turn-only restriction proposed for lighthouse/16<sup>th</sup> during PM peak period seems unnecessary to address LOS at that very lightly used intersection.

**California/Wienke:** Mitigation TRAF-1A proposes to address LOS by converting intersection control at California/Wienke to roundabout or signal, to be determined by ICE study required by Caltrans. California meets the signal warrant under existing conditions. Additional project trips at this intersection should be re-calculated for keeping Carlos open and should also consider that all new and re-assigned traffic will not necessarily use California for highway access. When a queue builds, motorists often choose among the three other adjacent intersections to spread out the wait time to enter the highway.

MCC and the community are adamantly opposed to any more traffic signals in the Midcoast. A signal at California, stopping highway traffic, and added pollution-spewing stacking lanes further splitting our town, would destroy the community vision for a context appropriate village circulation plan as was outlined in the Safety & Mobility Study. A roundabout at each end of Moss Beach would calm traffic without stopping it, provide safe pedestrian crossings, and convenient U-turns to avoid making left turns onto the highway, improving LOS at all intersections.

## Discrepancies in submittal documents

### Consistency Evaluation

Table 1, LCP Policies:

Policy 3.16(a)

- *"limits the number of building permits in any 12-month period to 60".*  
Correction: not building permits, but affordable housing units.

Policy 3.3:

- *"A portion of units in the project will include a preference for households who already live or work in the region."*  
Other references in the application make no mention of limiting this preference to a portion of the units. Please clarify.
- *"According to census data compiled in 2016, the three adjacent communities of Montara, Moss Beach, and El Granada – all of which are within 6 miles of the project site – contain 1,364 jobs."*  
Does this include jobs in Princeton and unincorporated Miramar?
- *"The project is within 1/4 mile walking distance of the Coastsides Market grocery, Moss Beach Park, Farallone View Elementary School, and the Seton Coastsides Medical Center."*  
Correction: Coastsides Market (a liquor/convenience store) and Moss Beach Park 1/2 mile, Farallone View School 1 mile, Seton Medical Center 1.2 miles.

Table 4 Community Plan 7.2(b):

- *"The project would consist of two-story buildings with roof heights varying between 32 and 36 ft."*  
This conflicts with PUD-124, #5: *"No structure shall exceed two stories or an average height of 25 ft."*  
Adherence to the lower height limit will help with neighborhood visual compatibility.

### Cumulative Impacts Analysis

Table 3 – List of Reasonably Foreseeable Projects

- HMB and Pacifica included comprehensive list with single-family dwellings. SMC unincorporated Midcoast includes only Big Wave, Harbor Village RV, 7<sup>th</sup> St Hotel, Main St Hotel. The mixed-use building at Hwy 1/Virginia and the many Midcoast single-family dwellings in the permitting process should be included.

Table 4&5 -- Population & Housing Units

- Pacifica and HMB are included, but the Midcoast is represented by only Montara and Moss Beach. El Granada, Princeton, and Miramar should be included.

Hwy 1 Moss Beach 50 mph speed limit is consistently misreported:

### Responses to Workshop Comments

#3 Traffic: *"combination of conditions that include 55 mph speed limits..."*

#8 Pedestrian Traffic: *"operational challenges due to the 55 mph speed limit..."*

Traffic Impact Analysis, p.33: *"a 55-mph facility such as Highway 1"*

Thank you for the opportunity to comment.





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for the San Mateo County Midcoast*

Date: January 6, 2020

To: Members of the Midcoast Community Council

Cc: Michael Schaller, Project Planner

San Mateo County Planning Commission

Steve Monowitz, Director Planning and Building

Erik Martinez, California Coastal Commission Planner

Stephanie Rexing, California Coastal Commission District Supervisor

San Mateo County Supervisor Don Horsley

From: Resist Density Board of Directors

Re: January 8, 2020 MCC Agenda and Proposed Cypress Point Project

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Dear MCC Members,

We write to urge you to include in this Wednesday's 1/8/2020 meeting an agenda item on the proposed Cypress Point project in Moss Beach and its Local Coastal Program (LCP) amendment. (Please note that the MCC agenda for this January 8 is dated 2019.)

The timing is critical, as we understand that the Cypress Point project LCP amendment will be on the San Mateo County's Planning Commission agenda to be held in a special meeting in Half Moon Bay on January 22. The next MCC meeting is canceled due to this meeting. If this Planning Commission meeting is indeed a public hearing on this LCP amendment, the Midcoast community needs to be notified now and the full scope of what changes are being considered needs to be clarified.

Having the Planning Commission consider this project before the Midcoast Community Council is contrary to the information on the San Mateo County website for the project.

<https://planning.smcgov.org/cypress-point-affordable-housing-community-project>. There the County has represented since at least April 2019 that "The applicant – MidPen Housing – submitted the application materials for this project on July 17, 2018. The next opportunity for public input will be when the project is formally brought before the Midcoast Community Council for their consideration and recommendation at a later date."

Through our Public Records Act (PRA) requests, Resist Density has uncovered information which raises major questions about the process surrounding MidPen Housing's proposed Cypress Point project in Moss Beach and its Local Coastal Program (LCP) amendment being presented as Phase One of the application.

We're including below an email chain we received through our PRA requests. These 2018 - 2019 communications are between MidPen's land use consultant, McCabe & Company, and the California Coastal Commission (CCC). In it, Renee Ananda of the CCC opines that the Coastal Development Permit (CDP) for Cypress Point would not be appealable to the CCC once the LCP is amended. We and the Midcoast community need to know if this CDP verdict by Renee



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Ananda is correct and what it means to the process of the LCP amendment and the project approval. When will MidPen Housing be required to produce an Environmental Impact Report or CEQA equivalent addressing specific concerns raised by Agencies, the MCC, the public and Resist Density? Will MidPen Housing be exempt from addressing major environmental concerns regarding traffic, road safety and infrastructure in this Planning Commission hearing? Will this allow MidPen Housing to sidestep important procedures established to protect the Coastal community?

As background, McCabe & Company describes itself: "McCabe & Company has helped hundreds of clients gain Coastal Commission approval for a wide variety of projects. Our effectiveness is evidenced by our proven track record of success." (For more information, visit <http://mccabeandcompany.net>)

MidPen Housing's April 15, 2019 application submission for an LCP amendment in conjunction with San Mateo County provided conflicting information about the project approval process. In May 2019, Resist Density submitted comments on the submission and asked for clarification on the process. Our questions have not been addressed to date.

The email chain below raises a very important concern that the community does not fully understand. We urge the MCC to consider the significance of the proposed LCP change and pursue clarification from the County on the process. With Supervisor Horsley attending this Wednesday's meeting, it is opportune to include him in the discussion. There must be transparency; the community needs to be informed and involved in such a significant project as this!

Thank you for your consideration. We look forward to your timely response,

- Resist Density Board of Directors

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Begin forwarded message:

**From:** Anne Blemker <[ablemker@mccabeandcompany.net](mailto:ablemker@mccabeandcompany.net)>  
**Subject:** FW: Cypress Point Question  
**Date:** June 5, 2019 at 9:47:56 AM PDT  
**To:** "Rexing, Stephanie@Coastal" <[Stephanie.Rexing@coastal.ca.gov](mailto:Stephanie.Rexing@coastal.ca.gov)>

Hi Stephanie,

It was definitely Renee (not Ruby!) that I was talking to about this project last year. Please see our exchange below. She concurred that the project would not be appealable after certification of the LCPA.



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I'll send the meeting request to you, Erik and Jeannine later today. The Planning Commission isn't expected to hear this until September/October, so a meeting sometime in the next month or so would be great.

Thanks,  
Anne

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Anne Blemker  
McCabe & Company  
10520 Oakbend Drive  
San Diego, CA 92131  
310.463.9888

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**From:** "Ananda, Renee@Coastal" <[Renee.Ananda@coastal.ca.gov](mailto:Renee.Ananda@coastal.ca.gov)>  
**Date:** Wednesday, September 26, 2018 at 9:39 AM  
**To:** Anne Blemker <[ablemker@mccabeandcompany.net](mailto:ablemker@mccabeandcompany.net)>  
**Subject:** RE: Cypress Point Question

Hello Anne,

I just left you a voicemail message. Correct, it would not be appealable to the Commission. Thank you, RTA

---

**From:** Anne Blemker [<mailto:ablemker@mccabeandcompany.net>]  
**Sent:** Wednesday, September 26, 2018 8:06 AM  
**To:** Ananda, Renee@Coastal  
**Subject:** Re: Cypress Point Question

Hi Renee,

Just wanted to follow up on my question below. Once the LCP is updated, would the project be appealable? I wouldn't think so (because the project would be in conformance with the LCP and be the "principal permitted use"), but wanted to confirm with you.

Thanks,  
Anne

On Sep 20, 2018, at 10:24 AM, Anne Blemker <[ablemker@mccabeandcompany.net](mailto:ablemker@mccabeandcompany.net)> wrote:

Thanks for getting back to me. (Especially during mail-out for October!) One follow-up question: once the LCPA is approved, would the County-issued CDP be appealable? I would think not since the project would then be consistent with the LCP.



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Anne

**From:** "Ananda, Renee@Coastal" <[Renee.Ananda@coastal.ca.gov](mailto:Renee.Ananda@coastal.ca.gov)>

**Date:** Wednesday, September 19, 2018 at 6:04 PM

**To:** Anne Blemker <[ablemker@mccabeandcompany.net](mailto:ablemker@mccabeandcompany.net)>

**Subject:** RE: Cypress Point Question

Hello Anne,

The parcel is zoned PUD-124, and although the geographic location of the proposed project site is within the County's permit jurisdiction, MidPen's proposed project would require an amendment to the Local Coastal Program (LCP) because what they are pursuing, is not in conformity with the Development Plan specified in the March 11, 1986 PUD-124 ordinance (See No. 3089 below). The amendment will likely be a Major Amendment because the proposed project, although reduced from what is approved in the LCP, will change the intensification of land use.

***PUD-124 Ordinance No. 3089-March 11, 1986***

*The following regulation shall govern use and development of a portion of the property commonly known as Farallon Heights in Moss Beach; Assessor's Parcel Number 037-022-040:*

1. Purpose

*The following PUD-124 regulation shall govern the land use and development of Farallon Vista, a residential complex for affordable and market rate housing, sited on an 11.02 acre parcel located east of Carlos Street and north of Sierra Street in Moss Beach.*

2. Development Plan





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*All developments shall conform to the development plans for the property as approved by the Planning Commission on October 9, 1985, and by the Board of Supervisors on March 11, 1986, and on file in the Office of the County Planning Division. Determination of conformity with the plan shall be made by the County Planning Director.*

3. Use

*The following uses only shall be allowed:*

*a. Residential development and related parking facilities for affordable and market rate housing as defined in Policies 3.19, 3.28 and 3.29 of the County Local Coastal Program.*

*b. Recreational uses for residents of the housing complex, i.e., exercise course, play area, tot lots, barbecue areas, etc.*

...

Hope this answers your question. Sorry I couldn't reply sooner. I am in the middle of preparing for the October hearing. Thank you, RTA

*Renée T. Ananda, Coastal Program Analyst  
California Coastal Commission – North Central Coast District  
45 Fremont Street, Suite 2000  
San Francisco, CA 94105*

*Phone: Main (415) 904-5260 Direct (415) 904-5292  
[renee.ananda@coastal.ca.gov](mailto:renee.ananda@coastal.ca.gov)*



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**From:** Anne Blemker [<mailto:ablemker@mccabeandcompany.net>]

**Sent:** Wednesday, September 19, 2018 12:20 PM

**To:** Ananda, Renee@Coastal

**Subject:** Cypress Point Question

Hi Renee,

Hope all is well. Just wanted to follow up on my voicemail to you. Susan and I were recently brought on to help with the Cypress Point affordable housing project in Moss Beach. I'm getting up to speed and going through all of the materials now. My primary question is: why would the local CDP be appealable? It doesn't seem to meet the typical criteria and I can't find a post cert map for this area of the County.

Thanks very much,

Anne

-----  
Anne Blemker  
McCabe & Company  
10520 Oakbend Drive  
San Diego, CA 92131  
310.463.9888



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June 1, 2019

*Via Email*

Stephanie Rexing  
Jeannine Manna  
Erik Martinez  
California Coastal Commission  
[Stephanie.Rexing@coastal.ca.gov](mailto:Stephanie.Rexing@coastal.ca.gov)  
[Jeannine.Manna@coastal.ca.gov](mailto:Jeannine.Manna@coastal.ca.gov)  
[erik.martinez@coastal.ca.gov](mailto:erik.martinez@coastal.ca.gov)

**RE: Cypress Point – Second Application Referral**

Dear Ms. Rexing, Ms. Manna, and Mr. Martinez,

Resist Density writes in regards to MidPen Housing's April 2019 second application submission and the California Coastal Commission's October 1, 2018 letter regarding this proposed project (<https://planning.smcgov.org/cypress-point-affordable-housing-community-project>).

We write to point out inconsistencies between what the Commission requested in October 2018 and MidPen's April 2019 submission. In addition, we write to express concern that MidPen appears to be impermissibly deferring the required analysis until its subsequent CDP submission or even after project approval, when it is reasonably foreseeable that the required LCP Amendment – if granted - will result in environmental impacts. Please consider that:

1. The proposed project's impacts to Highway 1 traffic are certainly not avoided or reduced. The proposed project will still result in five significant and *supposedly* "unavoidable" traffic impacts:
  - 1) Project traffic will critically delay traffic at Highway 1 and California/Wienke (delay over 124 seconds);
  - 2) Project traffic will critically delay traffic at Highway 1 and Carlos Street- the main access point to the Project from Highway 1;
  - 3) Project traffic will critically delay traffic at Highway 1 and Vallemar/Etheldore (112 seconds);
  - 4) Project traffic will critically delay traffic at Highway 1 and 16th Street (114 seconds);
  - 5) The Project will increase the risk of pedestrians being hit by vehicles as they attempt to cross State Route 1.
2. The Cypress Point Traffic Impact Analysis – updated April 2019 (Document 23) asserts that Project traffic is not anticipated to decrease the performance of public transit - based on the



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claim that the majority of State Route 1 traffic movements experience little or no delay. The claim that there will be “little or no delay” to transit is undermined by the admission of four of the above five significant and “unavoidable” traffic impacts. Also, MidPen has also not considered how the above expected traffic delays will affect traffic circulation on adjoining neighborhood streets, and thus public transit performance given the routes of SamTrans buses through Moss Beach (Traffic Impact Analysis, Figure 4 on page 19).

3. The applicant has not analyzed the round-about option to mitigate impacts as the Commission suggested. Also, MidPen also has not proposed to pay for the traffic signals and roundabouts it previously suggested.
4. Resist Density questions whether in fact traffic impacts have been mitigated as required by law. MidPen’s mitigation analysis is still unnecessarily truncated, does not explain how the proposed mitigations will reduce the severe traffic impacts, and impermissibly defers a number of mitigations until after project approval. MidPen proposes to push an intersection control evaluation onto Caltrans, and to be completed after project approval during the design phase. Likewise, MidPen has impermissibly deferred discussion of mitigations in its proposed Mitigation Measures TRAF-1A and TRAF-1B.

TRAF-1B consists of a vague “Transportation Demand Management Plan” which will not even be formulated for public review or the Commission’s 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. This poorly thought through measure includes one grocery cart that residents would walk one-mile round-trip coming back up a steep street, as little as one car share parking space, bus schedules, and the illusory “additional measures that may become available.” As MidPen is forced to acknowledge, the effectiveness of this plan can “not” be guaranteed.
5. The applicant has not discussed the likelihood that Caltrans will issue necessary encroachment permits, as the Commission suggested.
6. The applicant has not cooperated with SamTrans to incentivize public transportation or expand bus service.
7. While the applicant has included an alternative of fewer than 71 units of housing, the analysis claims that this alternative would have “the same” transportation and circulation impacts as the proposed project, but trip generation would be less. See Alternatives Analysis – Updated April 2019 (Document 8) Table 1 on page 24. Thus, this analysis omits discussion of whether traffic impacts *could be* further reduced or avoided by reducing the number of units or residents, as the Commission requested.





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8. As the Commission stated in its October 2018 correspondence, the LCP will need to be consistent with LCP Policy 2.52 and 2.53 among others. For the reasons stated above, Resist Density does not believe that MidPen to date has provided the information necessary for a traffic analysis and mitigation plan, as LCP Policy 2.52 requires.

Nor does MidPen's current vague "Transportation Demand Management Plan" come close to the comprehensive transportation management plan required by LCP Policy 2.53.

**Midcoast Community Council's Comments on proposed Cypress Point development**

<http://www.midcoastcommunitycouncil.org/affordable-housing/>

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



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June 1, 2019

*Via Email*

Patricia Maurice  
Jake Freedman  
California Department of Transportation  
[patricia.maurice@dot.ca.gov](mailto:patricia.maurice@dot.ca.gov)  
[jake.freedman@dot.ca.gov](mailto:jake.freedman@dot.ca.gov)

**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 14<sup>th</sup> 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

## Rexing, Stephanie@Coastal

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**From:** Julia M. Brinckloe <jmbrinck@comcast.net>  
**Sent:** Wednesday, May 22, 2019 2:15 PM  
**To:** midcoastcommunitycouncil@gmail.com; mschaller@smcgov.org; Rexing, Stephanie@Coastal; cgroom@smcgov.org; wslocum@smcgov.org; dpine@smcgov.org; dcanepa@smcgov.org; MossBeach@midpen-housing.org; info@resistdensity.org  
**Subject:** Concern from a Coastsider

To MCC, MidPen and Concerned Lawmakers:

My name is Julie Brinckloe and I am a longtime resident homeowner in Montara. I'm writing this letter because unfortunately I cannot attend tonight's critical MCC meeting in El Granada.

**I'd be very grateful if this letter is openly read during the comments period**, as I had hoped to speak as a concerned Coastsider on the impact of MidPen's housing plan.

To MCC and MidPen:

We all agree that people who contribute to a community should be able to live affordably. It's a matter of human rights and decency in a civil society.

But we also agree that affordable homes need not and *should* not cause harm to that community or it defeats the very goal they seek.

Our Coastside is a jewel of a place to live and a coveted destination. As such, it comes with special challenges to residents that other communities do not face, and we've lived with that.

On weekends and holidays it is beset by visitors, with all vehicles sharing the same two-lane road, coming and going. And traffic has always gotten heavy along the corridor from El Granada to Half Moon Bay.

Before the onset of the tunnel, it was still navigable. But those days are gone. Now it is a serious challenge to residents and has already degraded life here. In recent years, my drive time from Montara to Half Moon Bay has doubled. Cabrillo Highway has reached its limit.

I applaud MidPen's goal to create affordable living space. But I am shocked at the space they've chosen— smack dab in the *middle* of an already over-burdened two-lane road. It makes no sense whatsoever, and is unfair both to current residents and to those who will occupy MidPen homes and face an even worse traffic problem than we do now.

I beg you to consider the cost of this plan to the Coastside. And I respectfully urge you to reject the location once and for all.

It won't work—not for any of us. We simply cannot afford it.

Thank you for your time.

Very respectfully,

Julie Brinckloe  
Grumpkin Cottage  
Montara





*Via Email*

May 21, 2019

Midcoast Community Council  
PO Box 248  
Moss Beach, CA 94038  
[midcoastcommunitycouncil@gmail.com](mailto:midcoastcommunitycouncil@gmail.com)

Dear Midcoast Community Council Members,

Resist Density writes in regards to MidPen's April 15, 2019 updated application submission and the draft comment letter by Midcoast Community Council (MCC) dated May 22, 2019.

**Insufficient Time for Adequate Community Review**

As an initial matter, we believe that the short timeframe for MCC's response on this updated application is thwarting public involvement and understanding of the revised project analysis. We understand that the purpose of the MCC is to provide the local community with a more effective means to express its views to the County of San Mateo, particularly on matters of concern to the community. We understand that this item was added to the agenda just last Friday May 17. The updated application consists of over 1,500 pages. The alternatives analysis alone consists of 39 pages; the community does not have adequate time to consider and discuss the 6 newly presented alternatives. In addition, we understand that two of the MCC council members will not be attending the May 22 meeting. For these reasons, Resist Density believes it would be in the best interest of MCC and of the community to put this agenda item off at a minimum until MCC's next meeting on June 12.

**Support for MCC's Draft Comment Letter**

We have reviewed MCC's draft comment letter dated May 22, 2019. Resist Density supports a number of MCC's comments, including that

- (1) the height of the proposed MidPen project will constitute a significant adverse aesthetic impact and be inconsistent with community scale and existing PUD zoning,
- (2) MidPen has changed the local live-work project preference and that MidPen, not San Mateo County, is in control of this dimension of the project,
- (3) the cumulative impacts document is out of date and missing numerous other projects necessary for an adequate cumulative impact analysis, and
- (4) that there has been inadequate analysis of the impacts of 7,000 cubic yards of imported fill, including the construction-phase traffic and air quality impacts.

**Contradictory and Confusing Information about the Project Approval Process**

The MCC's draft May 22, 2019 comment letter also requested that MidPen list all changes proposed to the PUD Zoning. We would point out that MidPen and San Mateo County are providing conflicting information about the project approval process for this proposed project.





San Mateo County's website (<https://planning.smcgov.org/cypress-point-affordable-housing-community-project>) describes the "first phase of the project" as involving "consideration of the LCP amendment," but doesn't mention any County consideration of zoning changes, or amendment to the County's General plan.

MidPen's April 15, 2019 updated application submission, in the document entitled "Introduction And Project Description" states that MidPen is requesting that the California Coastal Commission – *not* San Mateo County - amend the LCP Implementation Plan and existing Planned Unit Development, and amend the LCP Land Use Plan and San Mateo County's General Plan to change the site's zoning designation.

That same document at Section 1.2.2 falsely claims that "San Mateo County has analyzed the full range of environmental conditions so that other agencies can rely upon it for CEQA compliance." Further confusing to the public is the assertion at Section 1.2.3 of the Introduction and Project Description that "the San Mateo County Planning and Building Department is acting as the applicant for the LCP Amendment before the Coastal Commission."

If San Mateo County has already analyzed the full range of environmental conditions and has determined that the Planning Department will be the applicant, what is the MCC being asked to do now after the fact? Moreover, how did San Mateo County reach this decision to be the project applicant without advising MCC and the public that it was prepared to do so?

#### **Need for More Thorough Analysis of Traffic Impacts and Mitigations**

We would ask MCC modify the draft letter's statement that there has been a "more thorough evaluation of traffic impacts and mitigations."

The proposed project will *still* result in five significant and supposedly "unavoidable" traffic impacts. That an environmental impact is unavoidable should be reason enough to recommend disapproval of this project as currently proposed. We are particularly concerned with the significant and unavoidable pedestrian safety impacts from this project. MidPen fails to mention that Carlos Street has no sidewalk, and that pedestrians who use the Sierra and Stetson Street sidewalks to follow MidPen's recommended route to the market or bus stop will face a steep slope on California Street and significantly more distance to and from the project site. Moreover, whereas a few months ago to address pedestrian safety, MidPen proposed rerouting bus lines. That modification has been dropped and no bus alternative is proposed by MidPen.

MidPen's mitigation analysis is still unnecessarily truncated and does not explain how the proposed mitigations will reduce the severe traffic impacts.

MidPen has not considered how the expected traffic delays will affect traffic circulation on adjoining neighborhood streets or pedestrian safety. 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 16<sup>th</sup> Street/Highway 1. (Kittelsohn 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. Clearly, this project will result in gridlock on neighborhood streets.

MidPen to date has failed to consider the obvious mitigation of reducing the proposed 71 residences and 213 residents in order to reduce traffic impacts. Nor has MidPen proposed to pay for the traffic signals and roundabouts being considered; MidPen seeks to have taxpayers pay for its poor planning.

We understand CEQA to require analysis of mitigations prior to project approval. Yet here MidPen continues to impermissibly defer mitigation analysis until after it gets its approvals. MidPen proposes to push an intersection control evaluation onto Caltrans, and to be completed after project approval during the design phase. Likewise, MidPen has impermissibly deferred discussion of mitigations in its proposed Mitigation Measures TRAF-1A and TRAF-1B.

TRAF-1B consists of a vague "Transportation Demand Management plan" which will not even be formulated for public review or MCC 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. This poorly thought through measure includes one grocery cart that residents would walk one-mile round-trip coming back up a steep street, as little as one car share parking space, bus schedules, and the illusory "additional measures that may become available." As MidPen is forced to acknowledge, the effectiveness of this plan can "not" be guaranteed.

We also understand that CEQA requires all phases of a project be reviewed for environmental impacts, including the construction phase. As MCC recognizes, importing 7000 cubic yards of fill will result in over 690 truck trips. There has been no analysis of the impacts of these trips either on Highway 1 traffic or on local roads.

#### **MidPen's Responses to Prior MCC Comments**

We have also reviewed MidPen's responses to MCC prior comments of August 22, 2018 and September 26, 2018. Resist Density notes the following:

1. We support MCC's comment that "approving more than the annual limit of 40 residential units/year cannot be justified if many of those units will go to residents commuting to jobs out of the area," and notes that MidPen has failed to provide any response to this comment.
2. We support the MCC's comment that the proposed project ignores the need for safe crossing of Highway 1, and notes that MidPen has failed to provide any response to this comment or the need for a Parallel Trail.
3. MidPen has not responded to MCC comments that the proposed project height will be inconsistent with existing PUD zoning.
4. MidPen proposes to impermissibly defer analysis of existing building pad asbestos until after project approval. That analysis can occur now, and by law should.



5. MidPen refuses to use the "Connect the Coastside" a.k.a. the Comprehensive Transportation Management Plan as traffic thresholds, but elsewhere in its Traffic Impact Analysis relies on the draft Connect the Coastside report when it serves MidPen's purposes.
6. MidPen has side-stepped MCC's comments about inconsistent statements regarding income requirements for residents.

**Resist Density's Prior Comments to MCC**

Resist Density submitted comments to the MCC about this proposed project on September 6, 2018, which are attached. MidPen's April 2019 updated application submission does not change the relevance of Resist Density's prior comments.

Thank you for your careful consideration of these important issues.

Resist Density Board of Directors

CC:

San Mateo County Board of Supervisors

Michael Schaller, Project Planner

San Mateo County Planning Commission

Steve Monowitz, Community Development Director

Stephanie Rexing, CA Coastal Commission

Jeannine Manna, CA Coastal Commission

Board of Directors, Montara Water and Sanitary District

Beverli Marshall, SAM

Joe LeClair, Connect the Coastside

Katie Yim, Lance Hall, Stephen Haas, Elliot Goodrich, Mohammad Suleiman, Aye Myint, Teblez

Nemariam, Ken Puth, Department of Transportation

Jill Ekas, Community Development Director of City of Half Moon Bay

Half Moon Bay City Council

Lennie Roberts, Committee for Green Foothills

## **Cypress Point – Mid Pen Housing**

**PLN2018-00264**

**1993 Carlos St, Moss Beach**

**Civil Comments – Traffic**

**By Hanieh Houshmandi**

### **Traffic Impact Analysis Review Comments 9/24/2018 for the July 31, 2018 submittal**

Status of review: Revise and Resubmit.

- 1- Please provide LOS analysis and results for all movements and not just intersections as a whole, for all study intersections and scenarios.
- 2- Please provide all traffic counts and Synchro models electronically. Please include all assumptions and changes made to default values in the Synchro models.
- 3- Please provide all the appendices to the TIA document along with a detailed site plan.
- 4- The proposed turn restrictions as mitigation measures are not acceptable. Please provide alternate mitigation measures to address project significant impact at Highway 1 and Vallemar/Etheldore and Highway 1 and 16<sup>th</sup>.
- 5- The closure of Carlos Street to all motor vehicles other than emergency vehicles is not acceptable as a mitigation measure. Please provide other mitigation measure/s to address the project's significant impacts.
- 6- SamTrans stop bus relocation is not a County project. It is up to the applicant to coordinate with SamTrans and provide all the necessary approvals from SamTrans to the County for review and consideration before the TIA can be approved. Please provide alternate mitigation measure in case SamTrans does not approve the proposed re-routing.
- 7- Please provide documentation that supports the premise that a fully funded project is currently moving forward. Absent an assurance that a fully funded project is in the process of being implemented, the applicant will be responsible for mitigating the project's impacts.



- 8- If the applicant is proposing any TDM measures as mitigation, the measures need to be clearly defined and calculations shown as how many trips will be reduced by each measure and how that will impact the operations and LOS at the applicable intersection(s). In addition, please provide a monitoring measure to each of the TDM measures proposed and an alternate measure in case the monitoring shows that TDM is not as effective as assumed.
- 9- Revise and resubmit as noted above.



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

September 6, 2018

Midcoast Community Council  
PO Box 248  
Moss Beach, CA 94038  
[midcoastcommunitycouncil@gmail.com](mailto:midcoastcommunitycouncil@gmail.com)

Dear Council Members,

Resist Density promotes the sensible planning and protection of the San Mateo County Midcoast. We also recognize the need for affordable housing in the County. However, MidPen's current Cypress Point multi-unit housing proposal would result in significant environmental impacts because it proposes to jam too many units into the wrong location.

MCC should oppose the project as currently proposed for the following reasons:

#### **DANGEROUS TRAFFIC IMPACTS**

The project application reveals that the project - as currently proposed - will result in numerous significant "and unavoidable" traffic impacts:

- 1) Project traffic will critically delay traffic at Highway 1 and California/Wienke.
- 2) Project traffic will critically delay traffic at Highway 1 and Carlos Street- the main access point to the Project from Highway 1. The project will make turns into and out of Carlos Street, as well as through traffic on Highway 1, substantially more hazardous.
- 3) Project traffic will critically delay traffic at Highway 1 and Vallemar/Etheldore.
- 4) Project traffic will critically delay traffic at Highway 1 and 16th Street.
- 5) Pedestrians crossing Highway 1 to access the coast or public transit are at great risk of being hit by oncoming traffic.

The Project - as currently proposed - will result in increased congestion and negative traffic impacts in violation of the Local Coastal Plan, and to the detriment of both the community and the new MidPen residents.

#### **INCREASED DEMAND ON ALREADY FAILING SEWAGE PIPES**

Over 100 sewage spills have occurred since 2011 according to review of public records. Even without MidPen's proposed development, the sewage pipe system serving this area has been grossly inadequate during storm events. Over 557,103 gallons of raw sewage have spilled into the Pacific Ocean and Half Moon Bay - almost entirely because of structural pipe failures. Further, tens of thousands of gallons of inadequately treated sewage has been released onto streets in residential neighborhoods within the City of Half Moon Bay, El Granada, Montara, Miramar, Moss Beach, and Princeton by the Sea.

The Project - as currently proposed - will add new sewage lines which only exacerbate the serious problems of the existing sewage lines.

#### **PRESENCE OF HAZARDOUS MATERIALS**

Historically, Cypress Point was a World War II military facility. An onsite incinerator may have been used to burn waste, without regard for the chemical composition of the substances being burned. A preliminary investigation of potential soil contamination revealed that there may be lead-containing

or other residues onsite from cartridges, gunpowder or munitions. Also, buildings which burned to the ground likely contained lead-based paint which may be present in soils on site. This, and the historic presence of an incinerator, represent a “recognized environmental condition.” Subsurface sampling was recommended and a limited Phase II subsurface investigation was conducted.

Lead was detected at concentrations between 4.5 and 230 mg/kg in surface soils. Diesel petroleum was detected at a concentration of 1.3 mg/kg. Metals, including arsenic, barium, chromium, cobalt, copper, molybdenum, nickel, vanadium, and zinc, were detected at concentrations between 1.0 and 44 mg/kg. Total hexafurans were detected at a concentration of 2.78 picograms/gram. Further soil sampling has been recommended to further assess the horizontal extent of lead-impacted surface soils around 2 identified locations.

MidPen’s preliminary environmental evaluation doesn’t opine on whether the soil contamination constitutes a significant impact or not, but does reveal that the transport and use of hazardous materials during construction of the proposed project would be a significant impact requiring mitigation.

### **MIDPEN IGNORES THE NEED FOR PHASED DEVELOPMENT**

The Local Coastal Plan limits the number of new dwelling units built in the urban Midcoast to a maximum of 40 units per year. The reason for this limit is to ensure that roads, utilities, public works facilities and community infrastructure are not overburdened by rapid residential growth. To date, there is no comprehensive transportation management plan for this area, and there is no evidence that sewage pipe reliability is adequate to avoid sewage overflows and water quality violations.

MidPen attempts to use a loophole for affordable housing, but the Local Coastal Plan is clear that this is not a guarantee that a proposed development is entitled to be approved.

### **INADEQUATE ENVIRONMENTAL REVIEW**

MidPen’s reports for its current proposal read more like advocacy pieces, rather than impartial environmental review.

#### ***Traffic Analysis***

- 1) The traffic analysis avoids any consideration of the traffic impacts of proposed restrictions on traffic movements (roundabouts, new signal lights, closing Carlos St., left turn restrictions) proposed as mitigations.
- 2) Impacts are called “unavoidable” rather than including an adequate range of alternatives and mitigations.
- 3) There is no consideration of creating a multi-use path adjacent to Highway 1 or of creating high visibility Highway 1 crosswalks.

#### ***Sewage Analysis***

The sewage analysis is artificially constrained to “dry weather flow” in evaluating the system’s capacity to handle growth. MidPen proposes to add new users in a concentrated time period, yet the MidPen technical reports do not even acknowledge the troubled state of the existing sewage pipes.

#### ***Hazardous Materials***

Assessment for the presence of asbestos containing materials was “out of [the] scope” of MidPen’s Phase I report. However, asbestos materials were commonly used for buildings constructed in the 1940s. Most of the building foundations are still present on the project site and the site appears to be littered with building materials. Thus, the project site should be tested for asbestos in soil and groundwater.

To deal with the acknowledged significant impact of hazardous materials during construction, MidPen’s preliminary evaluation promises a “Site Management Plan” will later be developed, but no details are provided regarding what standards this plan meet or why it will bring the impacts down to

a level of insignificance.

***MCC is Being Asked to Make Recommendations Without the Benefit of Required Environmental Analysis***

Amendments to the Local Coastal Plan (LCP) must comply with CEQA even though a technical EIR need not be prepared. As detailed above, MidPen has not provided analysis that complies with CEQA. Thus, the MCC is in the untenable position of making recommendations without knowledge of the full impacts of the proposed project, and potential mitigations.

Moreover, MidPen's proposal will require more than changes to the LCP: changes are required to San Mateo's County Zoning Map and zoning text amendment, an amendment to San Mateo County's General Plan, and proposed changes to the Planned Unit Development designation for this site. These zoning and General Plan changes are not merely technical changes; they will result in foreseeable physical environment changes, i.e. development of the site. Thus, adequate environmental review in the form of an EIR is needed for the public and MCC to evaluate the proposed project.

An EIR's purpose is to demonstrate to an apprehensive citizenry that the agency has in fact analyzed and considered the ecological implications of a proposed project. The technical reports which MidPen has prepared to date do not provide an adequate evaluation of potential project significant impacts, mitigations and alternatives.

Thank you for your consideration,

Resist Density Board of Directors



# Midcoast Community Council

*representing Montara, Moss Beach, El Granada, Princeton, and Miramar*  
P.O. Box 248, Moss Beach, CA 94038-0248 - [www.MidcoastCommunityCouncil.org](http://www.MidcoastCommunityCouncil.org)

**Dave Olson . Claire Toutant . Lisa Ketcham . Dan Haggerty . Chris Johnson . Brandon Kwan . Barbra Mathewson**  
Chair Vice-Chair Secretary Treasurer

Date: August 22, 2018

To: Michael Schaller, Project Planner

cc: Supervisor Don Horsley  
Steve Monowitz, Community Development Director  
Renée Ananda, CCC Coastal Program Analyst

From: Midcoast Community Council/ Dave Olson, Chair

Subject: **Proposed 71-Unit Cypress Point Affordable Housing Community  
on Carlos St, Moss Beach – PLN2018-00264, APN 037-022-070**

Wide public opposition to this project continues unabated, as demonstrated at MCC standing-room-only meeting 8/22/18 to consider this referral.

MCC 9/27/17 comments<sup>1</sup> on the pre-application for this project focused on the many long-standing community concerns regarding traffic, transit, and bike/pedestrian safety & mobility that are the subject of the Highway 1 Safety & Mobility Improvement Studies (Mobility Study), the Midcoast Highway 1 Crossings Project and the soon-to-be-released final draft of Connect the Coastside's Comprehensive Transportation Management Plan. Many years of Midcoast growth without much-needed and long-identified bike/ped safety and mobility improvements have caught up with us now with too many people dependent on their cars and stuck in traffic without safe and convenient alternative transportation. The key challenge to this project is the isolated rural site without adequate transit or bike/ped facilities, leaving residents dependent on their automobiles to reach jobs and services on already congested roads.

## Midcoast Residential Build-out

MCC has consistently advocated for the need to significantly reduce Midcoast residential build-out. The proposed LCP amendment would reduce land use density for this 11-acre parcel from medium-high to medium. Residential build-out numbers currently allocated to the parcel would be reduced by more than half, from 148 to 71 units.

## Affordability and Residency Preference for Local Workers

A stated project objective is to improve the jobs-housing balance in the Midcoast region; however, Midcoast housing far exceeds local jobs. The applicant has stated they would not be legally allowed to restrict housing to those with local jobs, but that a portion of the units will include a preference for households who already live or work in the region. MCC would prefer that the preference apply to all units. Every new residential unit that does not provide affordable housing for our local workforce, adds to our coastal jobs-housing imbalance and traffic congestion.

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<sup>1</sup> <http://www.midcoastcommunitycouncil.org/storage/mtgs-com2017/2017-09-27-MidPen-pre-app-MCC-com.pdf>

The requested amendment to LCP Policy 3.15(d) calls for all units, apart from resident manager's, to serve low- or moderate-income households. Elsewhere in the submittal the project consistently proposes all units restricted to low income (less than 80% AMI). MCC requests that the proposed LCP amendment match the rest of the submittal regarding low income affordability.

San Mateo County AMI is significantly higher than what local Coastside jobs provide. In Half Moon Bay one quarter of households earns less than \$50,000 per year. Please clarify how the proposed income restrictions would provide a Coastside jobs-housing fit.

### **Construction Phasing**

Construction is proposed in one phase, over approximately 18 months. If built in two phases, would there be more opportunity for residents with Coastside jobs to receive preference? Approving more than the annual limit of 40 residential units/year cannot be justified if many of those units will go to residents commuting to jobs out of the area.

### **Public Transit**

The project site is located on the Hwy 1 corridor adjacent to SamTrans Route 17 bus stops at 14<sup>th</sup> & 16<sup>th</sup>. Route 17 directly reaches Coastside job hubs in Half Moon Bay, Princeton, and Pacifica (10 minutes to Linda Mar and 25 minutes to downtown HMB). Current #17 service is hourly on weekdays, and every two hours on weekends. However, on weekdays at this location there is no southbound AM or northbound PM service when #17 is routed via Sunshine Valley Road (SVR). Route #18 has limited weekday service to Middle and High School in HMB but is also routed via SVR. Outside those hours, ridership utilizing SVR bus stops is very low and the more direct route on Etheldore and Highway 1 better serves other riders.

Mitigation TRAF-5B: The applicant proposes to address the safety of pedestrians crossing to the adjacent southbound bus stop at the lighthouse hostel by eliminating it and re-routing all buses via SVR. That would also eliminate the Hwy 1 bus stop at 14<sup>th</sup>, and Etheldore stops at California and Vermont. The closest bus stops to the project would then be 1/2 mile to 7<sup>th</sup>/Main or 3/4 mile to Etheldore/SVR, well outside the 1/4 mile range of convenience.

This proposal ignores the need for safe crossing at lighthouse/16<sup>th</sup> for the Coastal Trail, and inefficiency of SVR during non-school hours and travel direction. In order to serve the project, it would be better to keep the adjacent bus stop at the lighthouse hostel and explore re-routing all Route 17 trips to Hwy 1 and Etheldore, and leaving Route 18 to serve school riders on SVR.

This project highlights the urgent need for expanded Coastside public transit. Without convenient school and commuter bus service at this location on the highway corridor, or a project-sponsored shuttle to and from local jobs, this project cannot be justified.

### **Bike/Pedestrian Safety & Mobility**

For pedestrian safety, Mitigation TRAF-5A proposes a sidewalk connection between the project entrance on Carlos to the north side of Sierra Street.

The need for safe highway crossing at the lighthouse/16<sup>th</sup> cannot be brushed aside by saying there is no need for residents to cross the highway because the bus stop has

been removed. East side residents, workers and visitors all need to be able to conveniently walk or bike to the west side for recreation. Two crossing concepts for the lighthouse/16<sup>th</sup> were included in the 2012 Mobility Study – a raised median refuge island for 2-stage crossing and an overcrossing to the south where the road cut makes that feasible. The proposed project, with a significant number of new bike/ped/transit users, makes a safe crossing urgent.

If this housing project is to proceed, the Parallel Trail segment in this area must be prioritized and implemented, at a minimum between downtown Moss Beach and 14<sup>th</sup> St. Creating a bike/pedestrian-friendly community and calming highway traffic will help draw the kind of neighborhood commercial businesses needed to serve existing and future residents.

### **Vehicle Highway Access & Safety**

**Carlos:** Mitigation TRAF-2B proposes to decrease hazards by closing Carlos St north of the project entrance to all vehicles except emergency services. The Mobility Study and Connect the Coastside show this intersection as right turn only entering the highway and continued use of the center left turn lane eastbound into Carlos. Traffic counts show significant existing peak hour traffic from Sierra and Stetson using this route, which should remain available. Feasibility of re-routing Carlos to 16<sup>th</sup> for safer vehicle highway access needs further analysis. It is insufficient to say it is not feasible due to grading requirements and Level of Service (LOS) impact on 16<sup>th</sup> St, which has only three residences.

**Vallemar/Etheldore and lighthouse/16<sup>th</sup>:** Mitigation TRAF-3B proposes to address LOS by restricting peak hour left turns entering the highway at Etheldore/Vallemar. Left turns would be reassigned to Calif/Wienke. This would be a significant re-route for Vallemar which does not connect directly to Wienke and would add trips to that complicated 5-way intersection. As long as there is lane space on Vallemar so that left-turning vehicles do not block those turning right, turning movements should not be restricted simply to achieve a better LOS rating. A similar right-turn-only restriction proposed for lighthouse/16<sup>th</sup> during PM peak period seems unnecessary to address LOS at that very lightly used intersection.

**California/Wienke:** Mitigation TRAF-1A proposes to address LOS by converting intersection control at California/Wienke to roundabout or signal, to be determined by ICE study required by Caltrans. California meets the signal warrant under existing conditions. Additional project trips at this intersection should be re-calculated for keeping Carlos open and should also consider that all new and re-assigned traffic will not necessarily use California for highway access. When a queue builds, motorists often choose among the three other adjacent intersections to spread out the wait time to enter the highway.

MCC and the community are adamantly opposed to any more traffic signals in the Midcoast. A signal at California, stopping highway traffic, and added pollution-spewing stacking lanes further splitting our town, would destroy the community vision for a context appropriate village circulation plan as was outlined in the Safety & Mobility Study. A roundabout at each end of Moss Beach would calm traffic without stopping it, provide safe pedestrian crossings, and convenient U-turns to avoid making left turns onto the highway, improving LOS at all intersections.

## Discrepancies in submittal documents

### Consistency Evaluation

Table 1, LCP Policies:

Policy 3.16(a)

- ☐ *"limits the number of building permits in any 12-month period to 60".*  
Correction: not building permits, but affordable housing units.

Policy 3.3:

- ☐ *"A portion of units in the project will include a preference for households who already live or work in the region."*  
Other references in the application make no mention of limiting this preference to a portion of the units. Please clarify.
- ☐ *"According to census data compiled in 2016, the three adjacent communities of Montara, Moss Beach, and El Granada – all of which are within 6 miles of the project site – contain 1,364 jobs."*  
Does this include jobs in Princeton and unincorporated Miramar?
- ☐ *"The project is within 1/4 mile walking distance of the Coastsides Market grocery, Moss Beach Park, Farallone View Elementary School, and the Seton Coastsides Medical Center."*  
Correction: Coastsides Market (a liquor/convenience store) and Moss Beach Park 1/2 mile, Farallone View School 1 mile, Seton Medical Center 1.2 miles.

Table 4 Community Plan 7.2(b):

- ☐ *"The project would consist of two-story buildings with roof heights varying between 32 and 36 ft."*  
This conflicts with PUD-124, #5: *"No structure shall exceed two stories or an average height of 25 ft."*  
Adherence to the lower height limit will help with neighborhood visual compatibility.

### Cumulative Impacts Analysis

Table 3 – List of Reasonably Foreseeable Projects

- ☐ HMB and Pacifica included comprehensive list with single-family dwellings. SMC unincorporated Midcoast includes only Big Wave, Harbor Village RV, 7<sup>th</sup> St Hotel, Main St Hotel. The mixed-use building at Hwy 1/Virginia and the many Midcoast single-family dwellings in the permitting process should be included.

Table 4&5 -- Population & Housing Units

- ☐ Pacifica and HMB are included, but the Midcoast is represented by only Montara and Moss Beach. El Granada, Princeton, and Miramar should be included.

Hwy 1 Moss Beach 50 mph speed limit is consistently misreported:

### Responses to Workshop Comments

#3 Traffic: *"combination of conditions that include 55 mph speed limits..."*

#8 Pedestrian Traffic: *"operational challenges due to the 55 mph speed limit..."*

Traffic Impact Analysis, p.33: *"a 55-mph facility such as Highway 1"*

Thank you for the opportunity to comment.

From: [Karen deMoor](#)  
To: [Ananda, Renee@Coastal](mailto:Ananda.Renee@Coastal)  
Subject: MidPen Moss Beach project and rezoning PUD  
Date: Monday, May 21, 2018 9:04:50 AM

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Hi Renee,

I hope you are doing well and enjoying the Spring. I wanted to check in with you on the Moss Beach upcoming pre-application by MidPen and its efforts to rezone the property. We have become aware that this may be happening soon. As you know, we have several concerns about the proposed project, including the effort by a developer to rezone the parcel to suit its project. A couple of questions have come up for us, which I'm hoping you could help us understand better:

- What is the process for rezoning a PUD that is in the LCP?
- If a rezoning can take place, shouldn't other options be considered too, for example Open Space? We have found that this parcel is listed as "Eligible for Potential Open Space Set-Aside Program" in the 2016 Land Use Policy Options Report for the SM County Midcoast Transportation Management Plan. Please see page 16:  
<http://static1.1.sqspcdn.com/static/f/1461275/26915997/1458085474120/2016-03-10-CTMP-draft-rep-appendices.pdf?token=yxUd5TgilKLCGr9s4KITupHtlu8%3D>

Thank you very much in advance for any information you can share with us. I can be reached by email or my cell at 650-996-9286.

in health,

Karen

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Karen deMoor  
Board Member | **Resist Density** | [www.ResistDensity.org](http://www.ResistDensity.org)  
cell: 650-996-9286  
*Sensible planning and protection for the SM County Midcoast!*

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

resistdensity.org

# **SAM STATUS UPDATE AND SAM/MWSD FLOW ANALYSIS REPORT – March 7, 2018**

JQ Oeswein  
Resist Density Leadership Team



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## Executive Summary

- The large number and volume of sanitary sewer overflows (SSOs) on the San Mateo County Midcoast from January 2011 through May 2017 are indicative of an aged and failing infrastructure lacking a preventative maintenance program. These SSOs and other system failures have reduced operational reliability of the sewage system, increased emergency costs, added financial, legal and regulatory risk and they pose an ongoing threat to environmental safety.
- The potential for significant rainy seasons in 2018 and beyond could increase sewage flows to higher than “normal” levels, further increasing the risk of SSOs during or after heavy rains.
- SAM’s 5-year infrastructure plan for 2017 lists 44 projects, 10 of which are priority 1. Due to budget constraints, SAM proposed funding and initiation of only 2 infrastructure projects in the 2017/18 fiscal year at a cost of ~\$2M, with ~\$500K of that to come from emergency reserves. All other projects will be delayed.
- Ongoing litigation has added to SAM’s financial pressures. Litigation between SAM’s member agencies has also resulted in political infighting and ill will. This has reduced cooperation on key issues and risks timely completion of critical infrastructure projects.
- SAM is understaffed and is challenged to deliver reliable service.

## Recommendations

- SAM must find the means to complete all priority 1 infrastructure projects as soon as possible and establish a robust preventative maintenance program.
- SAM and member agencies should increase the rate of replacing aged pipes in their districts.
- SAM staff should have more up-front involvement and input into individual member agency strategies and plans, to ensure that they are pursued in the best interests of the overall collective.
- SAM’s next risk analysis should consider the cumulative impact of all approved and planned coastside developments over the next 5 years, including an estimate of unapproved second units in single family homes.
- New development permits for large developments (multi-unit housing, large commercial and industrial developments) should be more critically reviewed with respect to their impact on outdated and overburdened system infrastructure.
- A moratorium on new sewer connections for large developments should be considered until such time that all critical repairs and upgrades are completed and the risk of SSOs and system failures is reduced to an acceptable level.
- SAM should hire 2 additional staff in 2018 to maintain reliable service, as recommended by 2 consultant reviews.
- SAM should consider means to increase revenue, including new grants, loans, bonds and rate increases.

## Introduction

Our wastewater collection and treatment system on the San Mateo County Midcoast had 101 sanitary sewer overflows (SSOs) from 2011 through May 2017, most of which were directly attributable to failing infrastructure. A particularly large category 1 SSO on March 1, 2017 which discharged up to 746,000 gallons of raw sewage into the Pacific Ocean highlights the risks of an aging system, much in need of upgrade and repair (see Appendix 1 for details). In order to better understand these risks, several elements should be considered. These include:

- the Joint Powers Agreement (JPA) between the Sewer Authority Mid-Coastside (SAM) member agencies,
- the sewer system connections, operation, capacity and age,
- the frequency, causes and risks of sanitary sewer overflows (SSOs),
- infrastructure upgrades and repairs,
- historical flows through the system and
- challenges threatening operation or service.

## The Joint Powers Agreement (JPA)

Sewer Authority Mid-Coastside (SAM), founded in 1976, “provides wastewater treatment services and contract wastewater collection services for a population of approximately 30,000” to Half Moon Bay, Miramar, El Granada, Princeton, Moss Beach and Montara.<sup>1</sup> SAM’s operation is regulated by a Joint Powers Agreement (JPA) between the City of Half Moon Bay (HMB), the Granada Community Services District (GCSD) and the Montara Water and Sanitary District (MWSD), providing ownership interests for HMB, GCSD and MWSD of 50%, 30% and 20%, respectively. SAM has a Board of 6 directors, 2 from each member agency. HMB directors get 2 votes each, while GCSD and MWSD directors get 1 vote each, for a total of 8 votes. Among the Board’s duties are approval of the annual budget, capital projects and expenditures, maintaining a 5-year strategic plan and approval of resolutions that govern operation of the authority. Budget approvals must be unanimous, while approval of resolutions requires a 6-vote minimum. SAM’s operations are led by a General Manager who reports to the Board.

In general, operating costs, including upgrades and repairs, are shared among the member agencies, each in accordance with its usage of, or sewage flow into the SAM facility. These numbers are recalculated for each fiscal year and the budget allocations

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<sup>1</sup> <http://samcleanswater.org>

adjusted accordingly. SAM's fiscal year begins on July 1. For fiscal year 2016/17, the actual cost shares were HMB 48.2%, GCSD 28.4% and MWSD 23.4%.

## Sewer System Connections, Operation, Capacity and Age

SAM's main treatment plant is located just east of Half Moon Bay State Beach. The plant collects wastewater from the 3 member agencies through an 8-mile long intertie pipeline system (IPS - see Figure 1). SAM is responsible for maintenance of the IPS.

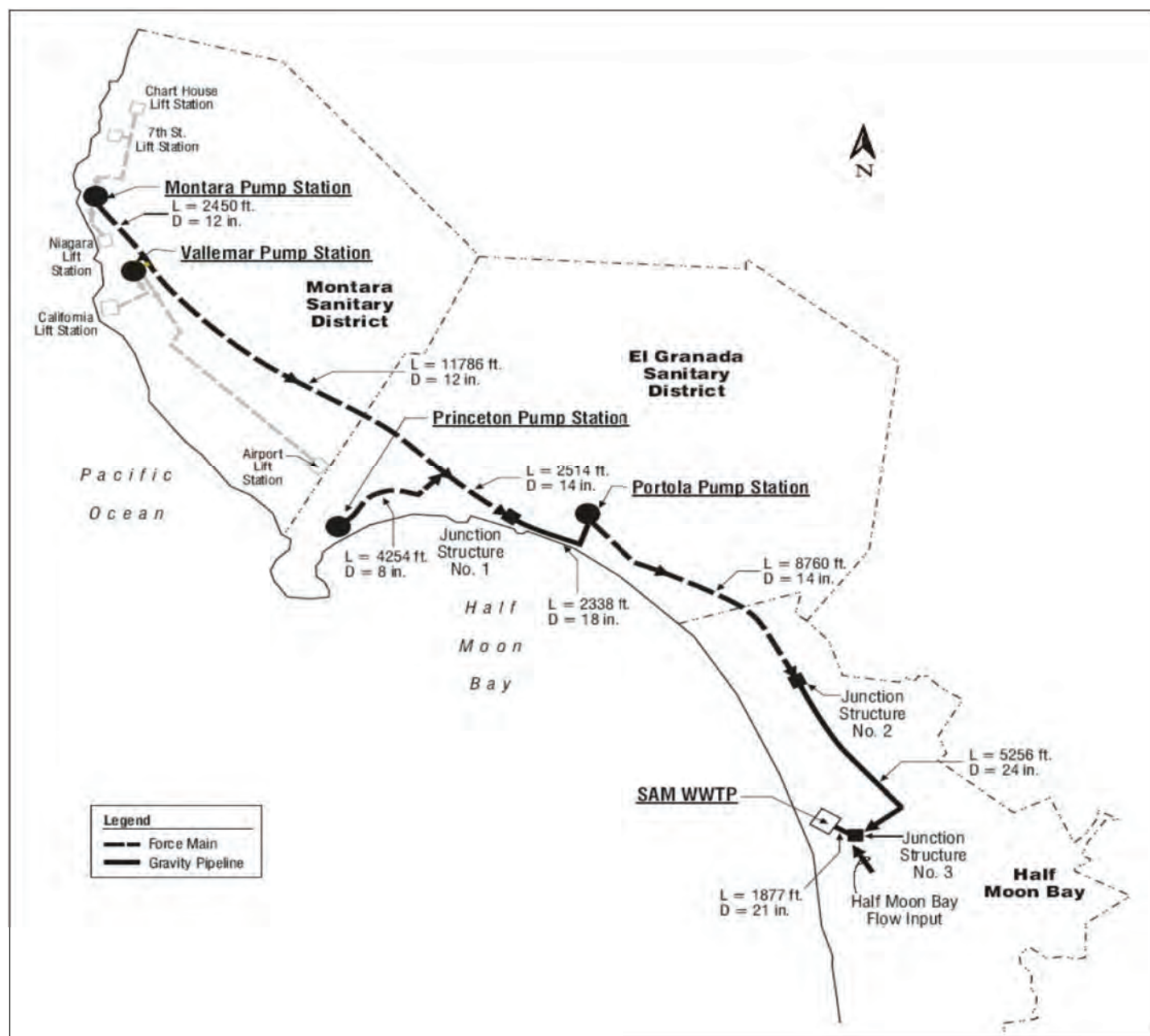


Figure 1. SAM Intertie Pipeline System (IPS) Map, indicating connections to member agency systems.

Source: [http://samcleanswater.org/vertical/sites/%7B1307B359-C05A-436D-AC1C-9EB8D6FFB4A3%7D/uploads/SAM Intertie Pipeline System Review and Evaluation SRT 2009.pdf](http://samcleanswater.org/vertical/sites/%7B1307B359-C05A-436D-AC1C-9EB8D6FFB4A3%7D/uploads/SAM%20Intertie%20Pipeline%20System%20Review%20and%20Evaluation%20SRT%202009.pdf)





SAM's wastewater treatment process consists of influent screening, grit removal, primary clarification, sludge activation, secondary clarification, chlorination, and dechlorination. The effluent is released through an outfall extending 1,900 feet into the Pacific Ocean. The sludge is treated by anaerobic digestion and belt filter press dewatering and is then disposed of at Ox Mountain Sanitary Landfill.

SAM has tentative plans to add tertiary treatment systems to the plant that will provide up to 800,000 gpd of recycled water, to be used mainly for irrigation.

The SAM plant has an average dry season sewage flow capacity of 3.71 million gallons per day (Mgpd), with a peak flow (pumping capacity for wet weather) of 15 Mgpd. A general overview of SAM system statistics is shown in Appendix 2.

Other parts of the system include gravity line segments, manholes, pumping facilities, pressure pipes, valves, storage tanks and applicable storm water facilities. Maintenance of these parts are primarily the responsibility of each member agency where the parts or systems are located.

### **1999 SAM Plant Expansion**

SAM's original dry season plant capacity was 2.0 Mgpd. An expansion of the SAM plant, increasing the dry season capacity to 4.0 Mgpd was proposed in 1996. Each member agency was initially allocated its share of costs for the expansion according to the JPA cost shares for HMB, GCSD and MWSD of 50%, 30% and 20%, respectively. The projected cost for Phase I of the plant expansion was estimated at ~\$21M. This provided for cost and dry season expansion capacity allotments of \$10M and 1 Mgpd for HMB, \$6M and 0.6 Mgpd for GCSD and \$4M and 0.4 Mgpd for MWSD.

However, MWSD could not cover its share of costs due to ongoing litigation, nor did it require this increased capacity. An agreement was reached whereby MWSD paid \$1.3M for an expansion capacity allocation of 0.11 Mgpd, with the option to purchase additional capacity allotments of 0.02 Mgpd as needed at a rate of ~\$1.1M/0.02 Mgpd. The balance of MWSD's 20% share of the expansion costs was advanced by HMB and GCSD. The expansion project was completed in 1999. SAM's total dry season capacity then became 3.71 Mgpd and MWSD's total capacity allocation (original plant plus expansion) became 0.51 Mgpd. In the event that MWSD exceeds an average dry season flow of 0.51 Mgpd, it will be obligated to reimburse HMB and GCSD for the advanced amounts plus interest. It appears highly unlikely that MWSD will exceed the 0.51 Mgpd cap in the near future unless there is a dramatic addition of new connections to the system, as indicated by the analysis of historical flow data included in this report.

## Sewer System and SAM Treatment Plant Age

Although various parts of the SAM and member agency systems have been repaired or replaced over time, SAM has had no preventative maintenance program and the failure rate of old pipes and key systems appears to be accelerating with age. The average age of the overall system in 2017 was about 47 years. Many of the secondary pipes in member agency districts are much older, as illustrated in Figure 2 for the Montara/Moss Beach communities. Older pipes have an increased failure rate, leading to an increased risk of SSOs.

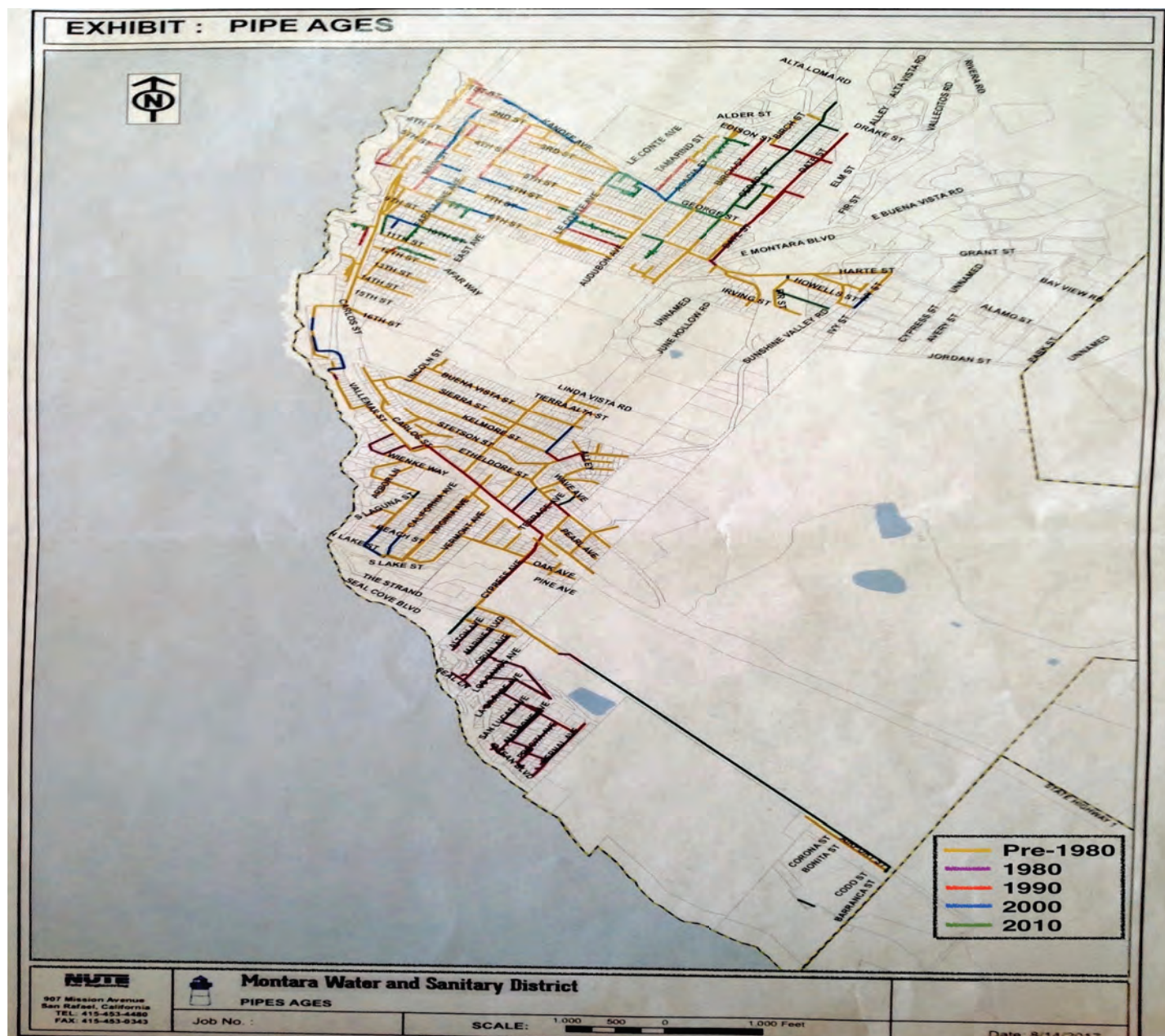


Figure 2. MWSD Sewer Lines Indicating Relative Age by Color. Those in yellow are over 37 years old.

Source: MWSD office file copy.



Five breaks in several force mains from October 2016 to May 2017 and the failure of the bus bar/duct in SAM's electrical system in November 2017 illustrate the increased risks of an aging infrastructure without preventative maintenance. These risks limit the operational capacity of the overall system and present significant challenges to meeting the ongoing wastewater treatment needs of the community.

## **The Frequency, Causes and Risks of Sanitary Sewer Overflows (SSOs)**

Resist Density's previous report, "Failing Infrastructure: Sanitary Sewer Overflows (SSOs)" shown in Appendix 1 provides a thorough review of SSOs from 2011 through May 2017, including their frequency, locations, severity and causes. The report indicates that ~884,000 gallons of raw sewage were spilled into the Pacific Ocean over that time, with ~773,000 gallons, or ~87% of that total, being spilled in the first 5 months of 2017 alone. The San Francisco Regional Water Quality Control Board (RWB) recently determined that SAM's SSO rates over the last 5 years (2012-2016) were above the median of all San Francisco Bay Region collection systems and other small systems in San Mateo County, despite the similarity in average age.<sup>2</sup> The nature and alarming amounts of these spills indicate that there are systemic issues with the underlying infrastructure and operational capacity of the sewage system that threaten environmental safety and increasing costs.

Of particular concern are 5 force main breaks in the IPS from October 2016 to May 2017 (Figure 3). Four of them occurred in early 2017, following unusually heavy rains in January and February. Emergency repair costs for these breaks was ~\$242K. In addition, RWB tentatively issued a ~\$523K penalty to SAM in August 2017 for a 344,000-gallon spill at Miramar Beach in March 2017, due to a force main break near Magellan Avenue in IPS segment 1.<sup>3</sup> SAM originally estimated that 756,000 gallons of raw sewage had been spilled into the Pacific Ocean as a result of that break. The large difference in spill volume from SAM's estimate and RWB's charge has not been clearly explained. SAM and RWB are currently in settlement discussions regarding that spill, with a final judgement on a fine and any enforcement action still to be determined as of February 2018.

Other spills over the last 6 years have been due mostly to pipe failures, tree root and debris intrusion and grease clogs. These have occurred throughout the system in both SAM and member agencies' districts. SSOs from January 2011 through May 2017 are included in Appendix 1. From June 2017 through January 2018, there were 5

<sup>2</sup> [https://www.waterboards.ca.gov/sanfranciscobay/board\\_decisions/adopted\\_orders/2017/R2-2017-0040.pdf](https://www.waterboards.ca.gov/sanfranciscobay/board_decisions/adopted_orders/2017/R2-2017-0040.pdf)

<sup>3</sup> [https://www.waterboards.ca.gov/sanfranciscobay/board\\_info/agendas/2017/September/SAMC/01A\\_SAM%20ACL%20Complaint.pdf](https://www.waterboards.ca.gov/sanfranciscobay/board_info/agendas/2017/September/SAMC/01A_SAM%20ACL%20Complaint.pdf)



additional SSOs throughout all districts (2 category 1 and 3 category 3) which spilled a total of 7,229 gallons of raw sewage, with 2,320 gallons of that recovered.



Figure 3. IPS Project Segments. Note the recent breaks in several force mains in Segments 1 to 3.

Source: [http://samcleanswater.org/vertical/sites/%7B1307B359-C05A-436D-AC1C-9EB8D6FFB4A3%7D/uploads/Force Main Project Update to Board - Jan 8 2018 .pdf](http://samcleanswater.org/vertical/sites/%7B1307B359-C05A-436D-AC1C-9EB8D6FFB4A3%7D/uploads/Force%20Main%20Project%20Update%20to%20Board%20-%20Jan%208%202018.pdf)

## Infrastructure Upgrades and Repairs

Infrastructure repair/upgrade projects are planned according to priority and available budget. SAM's 2017 5-year Infrastructure Plan<sup>4</sup> lists a total of 44 projects; 10 are priority 1 projects, 27 are priority 2 and 7 are priority 3. Priority 1 projects are considered "must do's" to meet safety and regulatory standards. The estimated cost to complete all infrastructure projects is ~\$10M, as shown in Table 1 below.

**Table 1. SAM Infrastructure Project Cost Estimates from the Latest 5-Year Plan.**

	Total Cost (\$K)	FY 17/18	FY 18/19	FY 19/20	FY 20/21	FY 21/22
Priority 1	2,350	75	1,035	725	515	0
Priority 2	6,055	2,000	900	590	1,225	1,340
Priority 3	1,630	0	300	700	400	230
<b>All</b>	<b>\$10,035</b>	<b>\$2,075</b>	<b>\$2,235</b>	<b>\$2,015</b>	<b>\$2,140</b>	<b>\$1,570</b>

All values are in thousands of dollars.

For the fiscal year 2017/18, the SAM BOD recommended an infrastructure budget of ~\$1.5M. Although this represents an increase of ~102% from that of the previous fiscal year, it still does not cover the cost of all priority 1 projects. Given this constraint, SAM proposed implementation of only 2 projects for the 2017/18 fiscal year. They are 1) replacement of segments 1-3 of the IPS (a priority 2 project with a bid accepted at ~\$2M) and 2) replacement of the Portola Pump Station surge tank (a priority 1 project with a bid accepted at ~\$30K). SAM has further proposed that the remainder needed to fund just these 2 projects (~\$500K) be taken from its emergency reserves. SAM had cash reserves of only ~\$1M as of Jul 31, 2017<sup>5</sup>. All other infrastructure projects will be delayed, further increasing the risk of failure.

The IPS is divided into 4 segments. The IPS project will replace segments 1 to 3, where recent force main breaks have occurred. The 4<sup>th</sup> segment has not yet shown signs of significant wear and will not be replaced at this time. The project was initiated in December 2017 and is expected to be completed in April 2018.

Disagreements among member agencies on cost sharing of the IPS project have led to litigation and political turmoil. This has created ill will among the member agencies and a delay in initiating the IPS project, as well as a failure to approve the 2017/18 budget.

<sup>4</sup> [http://samcleanswater.org/vertical/sites/%7B1307B359-C05A-436D-AC1C-9EB8D6FFB4A3%7D/uploads/PaperlessPacket111317\\_Strategic\\_WS.pdf](http://samcleanswater.org/vertical/sites/%7B1307B359-C05A-436D-AC1C-9EB8D6FFB4A3%7D/uploads/PaperlessPacket111317_Strategic_WS.pdf)

<sup>5</sup> <http://samcleanswater.org/vertical/sites/%7B1307B359-C05A-436D-AC1C-9EB8D6FFB4A3%7D/uploads/PaperlessPacket08-21-2017.pdf>



## Historical Flows Through the System

Flow data for SAM and all member agencies were copied from meeting minutes on SAM's website from January 2009 to September 2017.<sup>6</sup> These data were compiled and plotted, in order to gauge the impact of wet seasons and to indicate any anomalies, spikes or surges that approach capacity. Data for SAM and MWSD were also analyzed to extrapolate future flow relative to capacity. In addition, SAM and MWSD sewage flow in gallons per day (gpd) per capita and gpd per household were calculated and compared for different time periods. Data are organized as follows:

- Monthly averages over 6 prior years (Jan 09 to Sep 14)
- Monthly averages over the last 3 years (Oct 14 to Sep 17)
- Monthly averages over the last 1 year (Oct 16 to Sep 17)
- Monthly averages for year to date (YTD - Jan 17 to Sep 17)
- Monthly averages over the last 9 years (Jan 09 to Sep 17)
- Daily averages for last wet season (Nov 16 to Mar 17)
- Monthly averages for last 1 year and YTD per capita and per household

Data tables and graphs for various time periods are shown in Appendixes 3-16. Summary averages for SAM and MWSD derived from these data are shown in Tables 2-5 below.

**Table 2. Average Monthly SAM and MWSD Flows for Various Time Periods.**

	<b>Jan09-Sep14 (prior 6 years)</b>	<b>Oct14-Sep17 (last 3 years)</b>	<b>Oct16-Sep17 (last 1 year)</b>	<b>Jan17-Sep17 (YTD)</b>
SAM avg	1.65	1.58	1.82	1.92
SAM max	2.78	3.36	3.36	3.36
MWSD avg	0.344	0.337	0.381	0.402
MWSD max	0.630	0.821	0.784	0.784
<b>SAM dry avg</b>	<b>1.46</b>	<b>1.21</b>	<b>1.22</b>	<b>1.22</b>
<b>MWSD dry avg</b>	<b>0.285</b>	<b>0.233</b>	<b>0.232</b>	<b>0.232</b>

All values are in millions of gallons per day (Mgpd).

## Comparison of Different Time Periods

Analysis of data from all time periods since 2009 (Appendixes 4, 6 and 8) indicates that spikes in flow rates occur during wet seasons (Nov-Mar). SAM and MWSD total average flows for all seasons were slightly lower (~3%) for the past 3 years (2014-2017) compared to the prior 6 years (2009-2014), despite an ~3% increase in the number of users over the last 3 years. This generally suggests that customers have increased their efficiency of water use over that time. However, SAM and MWSD total

<sup>6</sup> [http://samcleanswater.org/index.asp?SEC=9584E073-FFDB-4D8C-B0E1-2D565502C53F&Type=B\\_BASIC](http://samcleanswater.org/index.asp?SEC=9584E073-FFDB-4D8C-B0E1-2D565502C53F&Type=B_BASIC)

average flows from October 2016 through September 2017 were ~14% higher than those from October 2014 through September 2017, while 2017 YTD averages through September were 26% higher. This was due to very heavy rains in early 2017.

### Dry Season Flows

Despite increases in total average or all-season flows, Table 2 also indicates that dry season averages changed very little from October 2014 through September 2017.

**Table 3. Average SAM and MWSD Annual Flows for Last 9 Years.**

Date	All-season flow (Mgpd)		Dry season flow (Mgpd)		Wet season flow (Mgpd)	
	SAM	MWSD	SAM	MWSD	SAM	MWSD
2009	1.660	0.343	1.479	0.295	2.025	0.445
2010	1.834	0.392	1.505	0.289	1.963	0.442
2011	1.749	0.367	1.512	0.308	2.223	0.479
2012	1.750	0.373	1.531	0.290	1.603	0.365
2013	1.443	0.285	1.377	0.267	1.855	0.392
2014	1.526	0.332	1.325	0.261	1.435	0.299
2015	1.309	0.270	1.180	0.244	1.806	0.405
2016	1.515	0.327	1.221	0.223	1.740	0.415
2017*	1.920	0.402	1.218	0.232	2.419	0.541
Minimum	1.309	0.270	1.180	0.223	1.435	0.299
<b>Average</b>	<b>1.634</b>	<b>0.343</b>	<b>1.372</b>	<b>0.268</b>	<b>1.897</b>	<b>0.420</b>
Maximum	1.920	0.402	1.531	0.308	2.419	0.541

\* 2017 all-season flow data are for Jan-Sep. All dry season flow data are for Jun-Sep of each year. All wet season flow data are for Nov-Mar of each year.

However, from January 2009 through September 2017, Table 3 indicates that dry season flow averages have generally decreased. A linear regression analysis of average dry season (Jun-Sep) flow data over this 9-year period indicates that average flows during dry months for SAM and MWSD decreased by approximately 46,000 gallons/year and 10,000 gallons/year, respectively (Appendixes 9 and 10). The maximum value for MWSD's average annual dry season flow over this period was 0.308 Mgpd in 2011. Since the Expansion Agreement cap for MWSD of 0.51 Mgpd applies to the average dry season flow, exceeding this cap in the future is not likely unless there is a dramatic addition of new connections to the system. This indicates that MWSD will not be liable to reimburse HMB and GCSD for advanced costs for MWSD's "full share" of the 1999 SAM plant expansion and further that MWSD will not need to purchase additional capacity in the near future.

## Impact of Wet Seasons on Flow

It is important to note that dry season flows do not adequately represent the operational capacity issues that have arisen due to the effect of failing infrastructure on the systems' ability to function adequately during significant rain events. Although year to year variability in rainfall does not produce a clear trend in average annual wet season (Nov-Mar) flow from January 2009 through September 2017 for either SAM or MWSD, the ratios of the 9-year average wet season flow to the 9-year average dry season flow for SAM and MWSD from Appendix 9 were ~1.4 and ~1.6, respectively, indicating that wet seasons add ~50% to the average annual flow relative to dry seasons. This average may be expected to increase in the future with higher amounts of rain. Appendix 13 indicates the significant impact of the 2016/17 wet season alone on sewage flows. Table 4 compares rain and flow amounts for the 2016/17 wet season to those of the last 3 years.

**Table 4. Average SAM and MWSD Flows for Last Wet Season (Nov16-Mar17).**

	Wet months (Nov16 - Mar17)		Last 3 yr (Oct14 - Sep17)	
	Flow, Mgp/d	Rain, in/mo	Flow, Mgp/d	Rain, in/mo
<b>SAM avg</b>	<b>2.47</b>	<b>7.6</b>	<b>1.58</b>	<b>2.7</b>
SAM max	7.51	14.7	3.36	14.7
SAM dry season avg	-	-	1.21	0.1
<b>MWSD avg</b>	<b>0.539</b>	<b>6.7</b>	<b>0.337</b>	<b>2.7</b>
MWSD max	1.626	11.4	0.821	15.2
MWSD dry season avg	-	-	0.233	0.2

Analysis of daily data from the 2016/17 wet season indicates that rain at the SAM plant during this period averaged 7.6"/month, compared to an average of 4.3"/month for the previous 2 wet seasons (Nov 2014-Mar 2015 and Nov 2015-Mar 2016 – Appendix 5) and 0.1"/month for the last 3 dry seasons (Jun-Sep). In order to gauge the relationship between sewage flows and rain amounts, average monthly flows from October 2014 through September 2017 were plotted against total monthly rain, independent of month of occurrence (Appendix 14). A linear regression analysis of these data indicates that flows are increased by ~141,000 gpd for SAM and ~40,000 gpd for MWSD, for every inch of rain per month.

Climate change has increased the potential for significant rainy seasons going forward. This will continue to increase SAM and all member agencies' average wet season flows, increasing the risk of SSOs during or after heavy rains.

## Per Capita Flow

Appendixes 15 and 16 provide population statistics and analyses of SAM and MWSD average flows per capita and per household from 2009 through 2017. Population statistics are derived from the 2010 census and assume a 1% annual growth rate (AGR) in population over that time. Per capita and per household data are summarized in Table 5. Average all-season flows per capita over the last 9 years were 70 gpd/person and 55 gpd/person for SAM and MWSD, respectively. Dry season flows per capita over the same period were 59 gpd/person and 43 gpd/person for SAM and MWSD, respectively.

**Table 5. SAM and MWSD Per Capita and Household Flow Data for Last 9 Years.**

	Jan09-Sep17 (9 years)	Jan17-Sep17 (YTD)	gpd/person*		gdp/household*	
			9-yr	YTD	9-yr	YTD
<b>SAM all-season avg</b>	1.63 Mgp/d	1.92 Mgp/d	<b>70</b>	79	189	213
<b>MWSD all-season avg</b>	0.343 Mgp/d	0.402 Mgp/d	<b>55</b>	62	154	173
<b>SAM dry season avg</b>	1.37 Mgp/d	1.22 Mgp/d	<b>59</b>	50	159	135
<b>MWSD dry season avg</b>	0.268 Mgp/d	0.232 Mgp/d	<b>43</b>	36	120	100

\* gpd = gallons per day. 2010 census data extrapolated to 2017 using a 1% AGR results in a SAM population of 24,448 and a MWSD population of 6,446. Similar extrapolation of household data (~2.7 people per household) results in 9,025 SAM households and 2,328 MWSD households for 2017 (see Appendix 15).

A linear regression analysis of the average dry flows per capita from 2009 through 2017 indicates that users have increased their efficiency of water use during dry months by 2-3 gallons per day per person per year (Appendix 16). Combining these data with those from Appendix 14 indicates that a 6 gpd per person water savings can completely offset the impact of an inch of rain on sewage flows. However, if wet seasons continue to be as significant as the 2016/17 one (7.6 inches of rain/month), water conservation of ~44 gpd per person would be required to offset that much rain. Although water conservation campaigns and promotions should continue, such a large conservation request to customers is not feasible. Also, requesting water conservation during wet seasons may seem counterintuitive and confusing to the public. In any case, upgrades and improvements will continue to be necessary to avoid risk of overflows during and after heavy rains.

## Challenges Threatening Operation or Service

The major challenges threatening operation or service of the sewage system are its age and condition, meeting regulatory requirements, ongoing litigation and political infighting between member agencies and the limited financial position of SAM.



HMB has disavowed responsibility for its share of the costs of the IPS and has sued SAM, GCSD and MWSD. In August 2017, HMB proposed going forward with the work and offered to advance its proposed share of the costs as a zero-interest loan to GCSD and MWSD, with repayment or forgiveness of the loan depending on the outcome of the litigation. The SAM BOD rejected this proposal<sup>7</sup>. This litigation has added to financial pressures and resulted in political infighting between member agencies. This has adversely affected the agencies' ability to cooperate on key issues, leading to a delay in initiating the IPS project and a failure to approve the 2017/18 budget.

The IPS project was initiated in December 2017. The project will not be completed before the end of the 2017/18 wet season, which presents a significant risk. Additionally, many of the sewer pipes in member agency districts are decades old and their rate of failure may be exceeding the agencies' ability to keep up with replacement, adding further risk of sewage spills throughout the community.

The San Francisco Regional Water Quality Control Board (RWB) is currently in settlement discussions with SAM over a large spill as a result of the IPS force main failure in March 2017, which will result in a fine of at least \$522,700. As previously stated, the potential for significant rainy seasons going forward threatens to push SAM and all member agencies' flows higher than "normal", increasing the risk of SSOs during or after heavy rains. One or more large spills in the future could also result in additional RWB fines and forced judgements that could further jeopardize SAM's financial position and ability to provide safe and reliable service.

Aging facilities and equipment, combined with delays in infrastructure projects and the lack of a preventative maintenance program, further risk an increase in the failure of key systems, requiring emergency repairs and unplanned spending. Emergency repair costs for failure of the IPS force mains earlier this year were \$242K.

A more recent example is the failure on November 29, 2017 of the bus bar/duct connecting PG&E electrical power to the SAM plant. Significant corrosion of the duct allowed rain water to leak into the duct and short out the electrical connectors inside. The electrical system repairs are underway and are expected to be completed in February 2018 at a cost of \$490K. SAM must run on emergency power generators until the repairs are completed. Relying only on generators also increases the risk of service interruptions, especially during rainy season. The bus/bar duct failure may have been avoided by preventative maintenance, although custom design of the plant's electrical

<sup>7</sup> [http://samcleanswater.org/vertical/sites/%7B1307B359-C05A-436D-AC1C-9EB8D6FFB4A3%7D/uploads/August\\_14\\_2017.pdf](http://samcleanswater.org/vertical/sites/%7B1307B359-C05A-436D-AC1C-9EB8D6FFB4A3%7D/uploads/August_14_2017.pdf)



system requires a complete shutdown for up to 2 days to perform the required inspection that would have revealed the damage to the bus/bar duct. Since a shutdown imparts its own significant risk, it was not done during a recent electrical inspection by Calcon Systems on September 29, 2017<sup>8</sup> and corrosion of the bus/bar duct was not discovered. Calcon did however note damage in 3 underground electrical conduits inside the plant.

At its October 23, 2017 board meeting, SAM approved a 1-year preventative maintenance contract with Calcon Systems<sup>9</sup>. Since Calcon's initial focus will be on repairing electrical systems that have already failed and periodic shutdowns that would be required for more thorough inspections are not currently planned, it is difficult to know if preventive maintenance activities will be sufficiently robust to avoid future failures.

### Consultant Reviews

A recent cost-effectiveness analysis in June 2016 by Municipal Resource Group, LLC (MRG) on SAM independent staffing versus contracted services<sup>10</sup> concluded that "SAM is currently, and has been, leanly staffed and challenged to perform even its day-to-day tasks. This 2016/17 winter provided record-breaking amounts of rain, and SAM staff was barely able to respond to the emergencies caused by system overloads". MRG further concluded that SAM "does not have enough work hours available to continue providing its current service level reliably". MRG recommended several strategies to improve efficiencies and manage demands, including the addition of 2 full time staff.

SAM also contracted Humphrey Consulting in March 2016 to review SAM's operation and maintenance procedures and performance<sup>8</sup>. Humphrey made several recommendations, including hiring 2 additional staff, benchmarking workflows and processes of 3 other treatment plants, providing more oversight and training of employees to encourage time management and prioritization and to avoid work duplication, broadening job descriptions to provide greater flexibility, delegating more responsibility to contractors to reduce management workload, improving administrative functions, improving inspection and servicing programs and improving pipe cleaning.

### 5-Year Strategic and Infrastructure Plans

Despite increasing its overall budget by two-thirds in the last 4 years, SAM is falling behind on needed repairs and upgrades.

<sup>8</sup> <http://samcleanswater.org/vertical/sites/%7B1307B359-C05A-436D-AC1C-9EB8D6FFB4A3%7D/uploads/PaperlessPacket102317.pdf>

<sup>9</sup> <http://samcleanswater.org/vertical/sites/%7B1307B359-C05A-436D-AC1C-9EB8D6FFB4A3%7D/uploads/PaperlessPacket111317.pdf>

<sup>10</sup> [http://samcleanswater.org/vertical/sites/%7B1307B359-C05A-436D-AC1C-9EB8D6FFB4A3%7D/uploads/PaperlessPacket\\_08142017.pdf](http://samcleanswater.org/vertical/sites/%7B1307B359-C05A-436D-AC1C-9EB8D6FFB4A3%7D/uploads/PaperlessPacket_08142017.pdf)



Although a preventative maintenance program was recently approved, its impact is still uncertain and SAM budgeted only 1 of 10 priority 1 infrastructure projects for 2017/18. Priority 1 projects are “must do’s” to meet safety and regulatory standards. In many cases, key system components are outdated and/or require extra effort to maintain, increasing the risk of failure. In other cases, equipment or facility condition jeopardizes staff safety. Also, only 1 (the IPS Force Main Replacement project) of 27 priority 2 projects was budgeted, while the other 9 priority 1 projects, 26 priority 2 projects and all 7 priority 3 projects were budgeted for future years. Delay of these projects continues to add more risk of overflows and accidents.

At the Jan 22, 2018 board meeting, SAM’s manager proposed updates to the 2018/19 5-year strategic and infrastructure plans which would cover 7 of 12 priority 1 projects at a budgeted cost of ~\$2.2M. All other projects would be delayed. However, SAM has insufficient revenues and cash reserves to cover just these 7 projects. It is therefore difficult to see how SAM can make acceptable progress on infrastructure improvements that will reduce overall risks in the near future, without further increasing member agency assessments or finding new sources of revenue.

Member agency budgets for infrastructure upgrades and capital improvements within each district were also increased in 2017/18, yet revenues are still not enough to keep pace with an increased rate of failure throughout the entire SAM district. As each SAM member agency focuses more on its own surmounting infrastructure problems, there is less focus on the needs of the SAM collective. It is very important that SAM management and staff be more involved in developing the strategies and plans of the individual member agencies to ensure that the “big picture” of sewage management on the coast is appropriately addressed.

It is also important that SAM and member agencies have more input into county decisions that affect their ability to provide reliable service for existing and future customers. Recent county decisions allowing for large commercial developments on the coastside, such as a brewery or cannabis farms, have the potential to significantly increase sewage flows and the risk of SSOs, yet these impacts have not been considered. Although individual member agencies may bear the most burden for large projects in their districts, cost sharing allowed for in the JPA will also add financial burden to the other member agencies, creating conflict and potential disagreements.

With the added impact of litigation and the potential for regulatory fines and forced judgements, SAM and member agencies risk falling further behind in meeting critical goals and ensuring ongoing safe and reliable service.



## About Resist Density

### Mission:

Resist Density advocates for the sensible development and conservation of coastal land given the fixed infrastructure constraints and geographic isolation of the Unincorporated San Mateo County Midcoast. We work to inform our community of the cumulative impacts of building developments, mobilize the community to take action, and express concerns to decision makers.

### Vision:

Resist Density's vision is the preservation of coastal open spaces, retention of its semi-rural community character, and assurance of coastal access and safety on HWY 1 for residents and visitors.

## About the author

James (JQ) Oeswein is a retired development scientist and scientific director. He is also a U.S. Army veteran, having served in Germany from 1971-73.

He received a B.S. degree with honors in Chemistry from the University of Kentucky in 1977 and a Ph.D. degree in Physical Biochemistry from the University of Florida in 1982. He had a very successful and rewarding post-graduate career in the biopharmaceutical industry at both Lilly Research Laboratories and Genentech, Inc.

His professional positions and appointments included leading several development projects in R&D, Quality and Manufacturing. He is an author of many scientific publications and presentations, as well as an inventor on several patents.

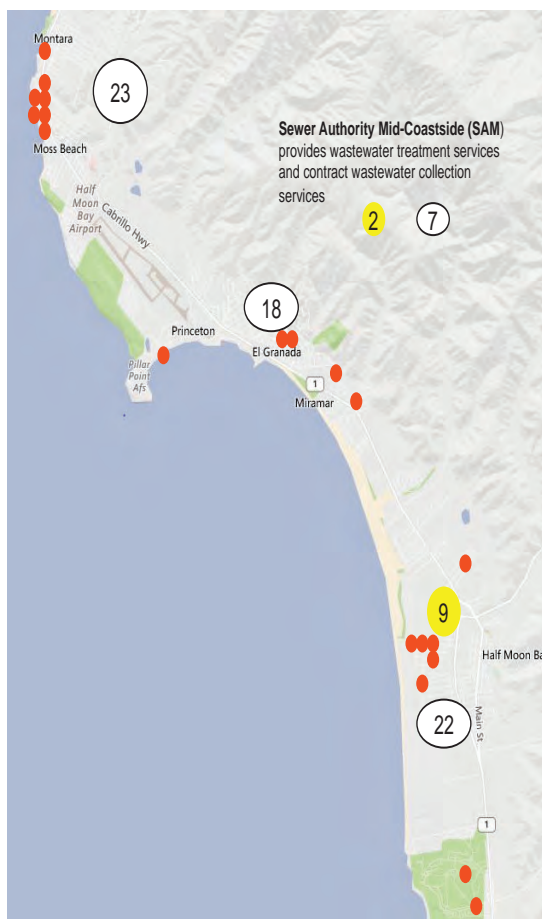
During the last few years of his career, he was a Director of Manufacturing Collaborations at Genentech, where he led the transfer of manufacturing and analytical technology of biopharmaceutical products from other companies and universities and also developed and managed manufacturing partnerships with other companies for in-licensed products.

JQ retired in 2007. His current interests include the continued pursuit of scientific knowledge, especially in the fields of astrophysics and cosmology. His hobbies include hiking the coastal trails and studying coastside history. He is currently a member of the Resist Density Leadership Team.

## Appendix 1: Sanitary Sewer Overflows from Jan 2011 to May 2017.

### Failing Infrastructure: Sanitary Sewer Overflows (SSOs)

A total of 101 overflows were recorded from Half Moon Bay to Montara from 2011 to mid 2017, according to public records. *These findings raise significant questions as to whether the infrastructure can accommodate any more large development.*



#### Definitions:

- Category 1: A spill of any volume of untreated or partially treated wastewater that reaches a drainage channel to or directly reaches the surface water (e.g. the ocean)
- Category 2: A spill of 1,000 gallons or more
- Category 3: A spill of under 1,000 gallons
- For 2 and 3, the spill does not reach a drainage channel or surface water.

• Overflows are not isolated to specific locations and seem to indicate a systemic issue with the underlying infrastructure and capacity of the sewage systems.

Agency / Category	Count	Category 1	Category 2	Category 3	Total
El Granada	19	1	0	18	19
Half Moon Bay	39	8	9	22	39
Montara	28	5	0	23	28
SAM	15	6	2	7	15
<b>Total</b>	<b>101</b>	<b>20</b>	<b>11</b>	<b>70</b>	<b>101</b>

• A total of 20 Category 1 overflows were recorded and released 883,763 gallons to drainage channels leading to surface water e.g. ocean. The San Francisco Regional Water Quality Control Board has issued a \$522,700 penalty for a 344,000-gallon spill at Miramar Beach that was discovered in early March 2017. SAM engineers originally estimated the spill was 756,000 gallons and later lowered the estimate to 746,000 (included in table below) and finally reduced it to 344,000 gallons\*.

Agency / Category	SSO Vol	Vol of SSO			Not Accounted For
		Recovered	Reached Surface Water	Vol of SSO	
Granada SD	3,055	1,295	1,125		635
Half Moon Bay City	167,018	8,781	104,739		53,498
Montara	17,744	9,401	12,970		(4,627)
SAM	776,274	15,470	* 764,929		(4,125)
<b>Total</b>	<b>964,091</b>	<b>34,947</b>	<b>883,763</b>		<b>45,381</b>

#### Source:

- Records obtained by Resist Density through Public Records Act request
- Information tabulated through manual review of approximately 10,000 pages of minutes, dashboards, etc., as summarized information was not available. Best effort was employed to assure accuracy.
- See appendix for detail by SSO

\* Source: HMB Review -  
State fines SAM \$522,000 for March sewer spill; August 24, 2017

## Appendix 1 continued: Sanitary Sewer Overflows from Jan 2011 to May 2017.

### Causes of Sanitary Sewer Overflows (SSOs) on the Coastsides

Root intrusions, structural problems and failures with the pipes, debris, and grease (FOG) are responsible for approximately 80% of the SSOs.

Cause / Agency	El Granada	Half Moon Bay	Montara	SAM	Total
Root intrusion	10	7	12		29
Pipe structural problem/failure	2	1	6	13	22
Debris	6	10	4		20
Grease (FOG)		11	2		13
Excessive rain		2			2
Flow exceeded capacity		2			2
Pump station failure				2	2
4 manholes blocked, cause not specified			1		1
City contractor fault, main line plugged		1			1
Main plug broke		1			1
Maintenance contractor fault		1			1
N/A	1				1
Pump failure (excessive rain)			1		1
Pump station power failure			1		1
Rainfall exceeded design		1			1
Resident digging		1			1
Root intrusion and debris			1		1
Surcharged pipe		1			1
<b>Grand Total</b>	<b>19</b>	<b>39</b>	<b>28</b>	<b>15</b>	<b>101</b>

Source:

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## Appendix 1 continued: Sanitary Sewer Overflows from Jan 2011 to May 2017.

# Sanitary Sewer Overflows (SSOs) 2011 - mid 2017 1 of 3

EVENT ID	Responsible Agency	SSO Category	Date	Year	SSO Address	SSO City	SSO Vol	Vol of SSO Recovered	Vol of SSO Reached Surface Water	Not Accounted	SSO Failure Point	Cause
760434	Granada SD	Category 3	1/7/2011	2011	557 Isabella Avenue	El Granada	5	5	0	-	Main	Root intrusion
772989	Granada SD	Category 3	11/10/2011	2011	838 Ferdinand Avenue	El Granada	40	20	0	20	Main	Root intrusion
786807	Granada SD	Category 3	9/27/2012	2012	260 Balboa Avenue	el granada	5	5	0	-	N/A	N/A
789296	Granada SD	Category 1	12/23/2012	2012	West Point & Stanford Ave	Princeton By the Sea	1,125	0	1,125	-	Main	Pipe structural problem/failure
789570	Granada SD	Category 3	11/19/2012	2012	577 Columbus Street	el granada	1	0	0	1	Upper Lateral	Root intrusion
791731	Granada SD	Category 3	2/14/2013	2013	Columbus & Portola Ave	El Granada	25	25	0	-	Main	Root intrusion
791764	Granada SD	Category 3	2/16/2013	2013	35 Valencia St	el granada	150	50	0	100	Main	Root intrusion
792290	Granada SD	Category 3	3/1/2013	2013	523 Balboa Avenue	El Granada	25	0	0	25	Main	Debris
797045	Granada SD	Category 3	7/16/2013	2013	San Pablo San Pablo Avenue	Half Moon Bay	50	0	0	50	Main	Pipe structural problem/failure
800431	Granada SD	Category 3	10/19/2013	2013	San Pablo and Alameda Ave	El Granada	400	350	0	50	Gravity Mainline	Root intrusion
804314	Granada SD	Category 3	1/22/2014	2014	23 Alameda Ave.	El Granada	577	400	0	177	Gravity Mainline	Debris
807692	Granada SD	Category 3	5/27/2014	2014	855 Palma Street	El Granada	165	35	0	130	Gravity Mainline	Debris
818101	Granada SD	Category 3	8/30/2015	2015	Portola Ave & Del Monte	El Granada	5	0	0	5	Gravity Mainline	Debris
819024	Granada SD	Category 3	10/19/2015	2015	643 Isabella St	El Granada	20	0	0	20	Gravity Mainline	Root intrusion
822599	Granada SD	Category 3	2/16/2016	2016	557 Isabella RD	El Granada	1	0	0	1	Gravity Mainline	Root intrusion
822826	Granada SD	Category 3	3/6/2016	2016	60 San Pablo Ave	El Granada	350	300	0	50	Gravity Mainline	Debris
823065	Granada SD	Category 3	3/15/2016	2016	523 Ave. Balboa	El Granada	1	1	0	-	Gravity Mainline	Root intrusion
823122	Granada SD	Category 3	3/12/2016	2016	16 The Alameda	El Granada	100	100	0	-	Gravity Mainline	Root intrusion
826956	Granada SD	Category 3	7/29/2016	2016	Vassar St	Princeton	10	4	0	6	Gravity Mainline	Debris
760368	Half Moon Bay City	Category 1	1/5/2011	2011	401 Greenbrier Road	Half Moon Bay	500	0	500	-	Main	Root intrusion
761335	Half Moon Bay City	Category 3	1/15/2011	2011	408 Casa de Mar Avenue	Half Moon Bay	5	5	0	-	Lower Lateral	Grease (FOG)
766171	Half Moon Bay City	Category 3	5/2/2011	2011	600 Grove Street	Half Moon Bay	20	10	0	10	Main	Grease (FOG)
766170	Half Moon Bay City	Category 3	5/3/2011	2011	416 Grove Street	Half Moon Bay	500	400	0	100	Main	Grease (FOG)
766857	Half Moon Bay City	Category 3	5/22/2011	2011	Main Street & Stone Pine Rd	Half Moon Bay	25	0	0	25	Main	Grease (FOG)
770038	Half Moon Bay City	Category 1	8/20/2011	2011	901 Alsace Lorraine Street	Half Moon Bay	329	329	1	(1)	Main	Debris
771701	Half Moon Bay City	Category 3	10/2/2011	2011	307 Church Street	Half Moon Bay	25	25	0	-	Main	Grease (FOG)
772135	Half Moon Bay City	Category 3	10/16/2011	2011	170 Correas Street	Half Moon Bay	15	0	0	15	Main	Grease (FOG)
773019	Half Moon Bay City	Category 2	11/13/2011	2011	Oak Street	Half Moon Bay	3,000	300	0	2,700	Main	Debris
775005	Half Moon Bay City	Category 1	12/4/2011	2011	509 Ocean Street	Half Moon Bay	500	0	500	-	Main	City contractor fault, main line plugged
774252	Half Moon Bay City	Category 3	12/17/2011	2011	411 Bayhill Rd	Half Moon Bay	625	0	0	625	Main	Debris
775914	Half Moon Bay City	Category 3	1/16/2012	2012	555 Kelly Avenue	Half Moon Bay	25	25	0	-	Main	Main plug broke
776850	Half Moon Bay City	Category 3	2/4/2012	2012	815 First Avenue	Half Moon Bay	150	150	0	-	Main	Debris
777065	Half Moon Bay City	Category 3	2/9/2012	2012	717 Main Street	Half Moon Bay	4	4	0	-	Main	Maintenance contractor fault

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## Appendix 1 continued: Sanitary Sewer Overflows from Jan 2011 to May 2017.

# Sanitary Sewer Overflows (SSOs) 2011 – mid 2017 2 of 3

EVENT ID	Responsible Agency	SSO Category	Date	Year	SSO Address	SSO City	SSO Vol	Vol of SSO Recovered	Vol of SSO Reached Surface Water	Not Accounted	SSO Failure Point	Cause
781589	Half Moon Bay City	Category 1	5/23/2012	2012	Turnberry Road (15th hole go	Half Moon Bay	750	150	600	-	Main	Root intrusion
782248	Half Moon Bay City	Category 3	6/19/2012	2012	363 poplar	Half Moon Bay	3	0	0	3	Main	Debris
789048	Half Moon Bay City	Category 3	12/2/2012	2012	kelly ave Avenue ( half moon	Half Moon Bay	200	0	0	200	Main	Excessive rain
789292	Half Moon Bay City	Category 2	12/23/2012	2012	Balboa Boulevard (St. Francis	Half Moon Bay	10,125	500	0	9,625	Main	Flow exceeded capacity
803996	Half Moon Bay City	Category 1	2/17/2014	2014	507 Terrace Ave	Half Moon Bay	2,063	0	2,063	-	Gravity Mainline	Debris
805804	Half Moon Bay City	Category 3	3/21/2014	2014	7-11 parking lot (Main & 92)	Half Moon Bay	3	0	0	3	Gravity Mainline	Debris
805803	Half Moon Bay City	Category 3	3/21/2014	2014	196 San Mateo Road	Half Moon Bay	449	200	0	249	Gravity Mainline	Pipe structural problem/failure
806329	Half Moon Bay City	Category 3	5/21/2014	2014	217 Miramontes Ave	Half Moon Bay	500	0	0	500	Gravity Mainline	Grease (FOG)
807222	Half Moon Bay City	Category 2	6/23/2014	2014	Ocean and Valez	Half Moon Bay	5,550	0	0	5,550	Gravity Mainline	Grease (FOG)
808001	Half Moon Bay City	Category 2	7/27/2014	2014	260 Magnolia	Half Moon Bay	1,250	0	0	1,250	Gravity Mainline	Grease (FOG)
808911	Half Moon Bay City	Category 2	8/30/2014	2014	170 Correas Street	Half Moon Bay	8,250	0	0	8,250	Gravity Mainline	Debris
810402	Half Moon Bay City	Category 3	9/11/2014	2014	683 Myrtle Street	Half Moon Bay	675	0	0	675	Gravity Mainline	Root intrusion
810421	Half Moon Bay City	Category 3	9/24/2014	2014	First Ave/Myrtle Street	Half Moon Bay	330	330	0	-	Gravity Mainline	Root intrusion
811604	Half Moon Bay City	Category 1	12/11/2014	2014	751 First Avenue	Half Moon Bay	99,850	0	99,850	-	Manhole	Rainfall exceeded design
816683	Half Moon Bay City	Category 2	7/16/2015	2015	409 Granelii Ave	Half Moon Bay	3,581	75	0	3,506	Upper Lateral (Pu	Grease (FOG)
816685	Half Moon Bay City	Category 2	7/16/2015	2015	409 Granelii Avenue	Half Moon Bay	3,581	3,581	0	-	Gravity Mainline	Grease (FOG)
817579	Half Moon Bay City	Category 3	8/14/2015	2015	551 Myrtle St	Half Moon Bay	600	600	0	-	Gravity Mainline	Resident digging
817401	Half Moon Bay City	Category 2	8/15/2015	2015	1st Ave/Myrtle street	Half Moon Bay	1,875	1,875	0	-	Gravity Mainline	Debris
817535	Half Moon Bay City	Category 3	8/20/2015	2015	604 Grove st	Half Moon Bay	50	0	0	50	Gravity Mainline	Debris
819457	Half Moon Bay City	Category 3	11/12/2015	2015	411 Bayhill Road	Half Moon Bay	150	0	0	150	Gravity Mainline	Root intrusion
827159	Half Moon Bay City	Category 3	8/9/2016	2016	675 Myrtle	Half Moon Bay	15	2	0	13	Gravity Mainline	Root intrusion
828254	Half Moon Bay City	Category 3	9/17/2016	2016	1230 Loryn Ln	Half Moon Bay	20	20	0	-	Gravity Mainline	Root intrusion
831439	Half Moon Bay City	Category 1	1/4/2017	2017	220 Kelly ave	Half Moon Bay	1,125	0	1,125	-	Gravity Mainline	Flow exceeded capacity
832910	Half Moon Bay City	Category 2	2/20/2017	2017	400 Balboa Blvd	Half Moon Bay	20,000	0	0	20,000	Manhole	Surcharged pipe
833893	Half Moon Bay City	Category 1	3/21/2017	2017	212 Kelly St	Half Moon Bay	300	200	100	-	Lower Lateral (Pu	Excessive rain
764426	Montara	Category 3	3/15/2011	2011	387 Fourth Street	Montara	10	0	0	10	Main	Root intrusion
765329	Montara	Category 1	4/9/2011	2011	140 beach way Way	Montara	50	0	50	-	Main	Pipe structural problem/failure
768827	Montara	Category 3	7/21/2011	2011	821 Ocean Boulevard	Moss Beach	10	0	0	10	Lower Lateral	Pipe structural problem/failure
772467	Montara	Category 3	10/27/2011	2011	11th St & Main St.	Montara	10	0	0	10	Main	Root intrusion
775101	Montara	Category 3	1/2/2012	2012	741 edison Street	Montara	75	75	0	-	Main	Debris
781477	Montara	Category 3	5/18/2012	2012	Marine blvd and Park way	Moss Beach	400	400	0	-	Main	4 manholes blocked, cause not specified
781676	Montara	Category 1	5/29/2012	2012	Nevada ave Avenue	Montara	1000	0	1000	-	Main	Pipe structural problem/failure
788653	Montara	Category 3	12/1/2012	2012	391 6th St	Montara	50	50	0	-	Main	Root intrusion
789127	Montara	Category 1	12/17/2012	2012	Virginia Avenue & Cabrillo Hi	Montara	100	80	20	-	Main	Grease (FOG)
792729	Montara	Category 3	3/17/2013	2013	8th street farallones Avenue	Montara	750	0	0	750	Main	Debris
810250	Montara	Category 3	9/9/2014	2014	541 Franklin Street	Montara	75	0	0	75	Gravity Mainline	Root intrusion

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## Appendix 1 continued: Sanitary Sewer Overflows from Jan 2011 to May 2017.

### Sanitary Sewer Overflows (SSOs) 2011 – mid 2017 3 of 3

EVENT ID	Responsible Agency	SSO Category	Date	Year	SSO Address	SSO City	SSO Vol	Vol of SSO Recovered	Vol of SSO Reached Surface Water	Not Accounted	SSO Failure Point	Cause
811405	Montara	Category 3	12/11/2014	2014	100 7th Street	Montara	875	0	0	875	Pump Station-Cont	Pump failure (excessive rain)
811783	Montara	Category 3	12/20/2014	2014	Carlos & Admiral Street Inter	Moss Beach	530	530	0	-	Gravity Mainline	Root intrusion
812110	Montara	Category 3	12/31/2014	2014	140 San Lucas	Moss Beach	5	5	0	-	Gravity Mainline	Debris
812107	Montara	Category 3	1/3/2015	2015	1350 Main Street	Montara	265	265	0	-	Gravity Mainline	Root intrusion
815400	Montara	Category 3	5/21/2015	2015	Valleamar Pump Station (Valle	Moss Beach	750	750	0	-	Force Main	Pipe structural problem/failure
815622	Montara	Category 3	5/29/2015	2015	121 Bernal Ave	Moss Beach	1	1	0	-	Gravity Mainline	Debris
816620	Montara	Category 3	7/10/2015	2015	286 11th st	Montara	100	50	0	50	Gravity Mainline	Root intrusion
819235	Montara	Category 3	10/7/2015	2015	510 6th St	Montara	10	0	0	10	Manhole	Root intrusion
819022	Montara	Category 3	10/15/2015	2015	741 Edison st	Montara	75	0	0	75	Gravity Mainline	Root intrusion
819236	Montara	Category 3	10/28/2015	2015	441 Franklin St	Montara	5	0	0	5	Gravity Mainline	Grease (FOG)
824672	Montara	Category 3	5/17/2016	2016	676 Sierra Street	Moss Beach	20	15	0	5	Gravity Mainline	Root intrusion and debris
825290	Montara	Category 3	5/21/2016	2016	2015 Carlos St.	Moss Beach	225	150	0	75	Gravity Mainline	Root intrusion
825159	Montara	Category 3	5/28/2016	2016	121 Bernal Ave	Moss Beach	3	0	0	3	Gravity Mainline	Pipe structural problem/failure
825687	Montara	Category 3	6/17/2016	2016	851 Loma Vista St	Moss Beach	420	0	0	420	Gravity Mainline	Root intrusion
827060	Montara	Category 1	8/7/2016	2016	2015 Carlos St.	Moss Beach	900	0	900	-	Gravity Mainline	Root intrusion
831952	Montara	Category 1	1/22/2017	2017	8150 Cabrillo hwy	Montara	11000	7000	11000	(7,000)	Pump Station-Pow	Pump station power failure
832361	Montara	Category 3	1/30/2017	2017	140 Beach Way	Moss Beach	30	30	0	-	private force main	Pipe structural problem/failure
764829	SAM	Category 3	3/24/2011	2011	West Point Avenue (Princeto	El Granada	870	870	0	-	Influent main line	Pump station failure
773427	SAM	Category 3	11/22/2011	2011	Valleamar Street (pump statio	Moss Beach	20	0	0	20	Force Main	Pipe structural problem/failure
773484	SAM	Category 1	11/24/2011	2011	Valleamar Street (pump statio	Moss Beach	200	0	100	100	Force main	Pipe structural problem/failure
776285	SAM	Category 1	1/21/2012	2012	Coronado Street & Obispo Rd	El Granada	3136	500	2636	-	Main	Pipe structural problem/failure
776355	SAM	Category 3	1/24/2012	2012	2084 valleamar Street	Moss Beach	500	0	0	500	Main	Pipe structural problem/failure
776402	SAM	Category 1	1/25/2012	2012	Coronado Street & Obispo Rd	El Granada	500	0	500	-	Main	Pump station failure
798461	SAM	Category 3	9/4/2013	2013	141 california Avenue	El Granada	5	0	0	5	air release valve	Pipe structural problem/failure
803569	SAM	Category 1	2/2/2014	2014	Valleamar St (near 2066 Valle	Moss Beach	693	0	693	-	Force Main	Pipe structural problem/failure
811436	SAM	Category 3	12/13/2014	2014	2066 Valleamar Street	Moss Beach	500	0	0	500	Force Main	Pipe structural problem/failure
821237	SAM	Category 3	1/20/2016	2016	Between 2166 and 2150 valle	Moss Beach	625	400	0	225	Force Main	Pipe structural problem/failure
829271	SAM	Category 2	10/19/2016	2016	470 Fortado Lane	Half Moon Bay	2400	500	0	1,900	Force Main	Pipe structural problem/failure
833531	SAM	Category 1	3/1/2017	2017	311 Magellan Ave	Half Moon Bay	* 746000	13000	746000	(13,000)	Force Main	Pipe structural problem/failure
834198	SAM	Category 1	4/2/2017	2017	Furtado Lane & Cabrillo Highw	Miramar	15000	0	15000	-	Force Main	Pipe structural problem/failure
834641	SAM	Category 2	4/16/2017	2017	501 Alto Ave	Half Moon Bay	5625	0	0	5,625	Force Main	Pipe structural problem/failure
835414	SAM	Category 3	5/16/2017	2017	3029 Cabrillo Hwy		200	200	0	-	Force Main	Pipe structural problem/failure

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- For 2 and 3, the spill does not reach a drainage channel or surface water.

#### Source:

- Records obtained by Resist Density through Public Records Act request
- Information tabulated through manual review of approximately 10,000 pages of minutes, dashboards, etc., as summarized information was not available. Best effort was employed to assure accuracy.
- See appendix for detail by SSO

\* The San Francisco Regional Water Quality Control Board has issued a \$522,700 penalty for a 344,000-gallon spill at Miramar Beach that was discovered in early March 2017. SAM engineers originally estimated the spill was 756,000 gallons and later lowered the estimate to 746,000 (shown in table above) and finally reduced it to 344,000 gallons. Source: HMB Review - State fines SAM \$522,000 for March sewer spill, August 24, 2017

## Appendix 2: SAM Quick Facts (from PR brochure).

### QUICK FACTS

**Wastewater Treated System-wide (permitted):** 3.71 million gallons per day

**Wastewater Treated System-wide (actual dry weather):** 1.5 million gallons per day

**Population Served:** Over 25,000

**Area Served:** 22 square miles

**Wastewater Lines:** Over 100 miles

**Transmission Line:** 8 miles

**Wastewater Pipe Diameter:** 4 to 24 inches

**Main Pump Stations:** 3

**Lift Stations:** 23

**# of Employees:** 13

**Member Agencies:** 3 (City of Half Moon Bay, Granada Community Services District, Montara Water & Sanitary District)

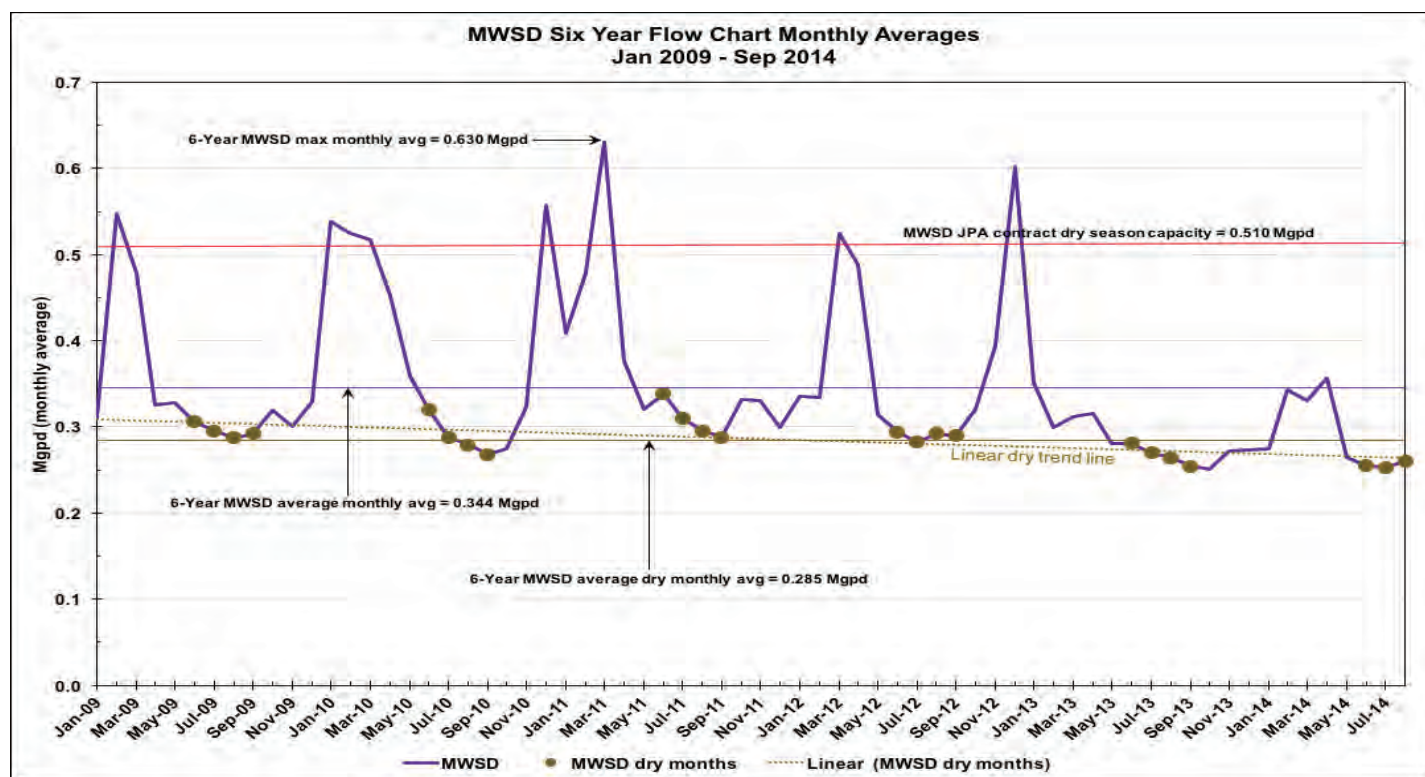
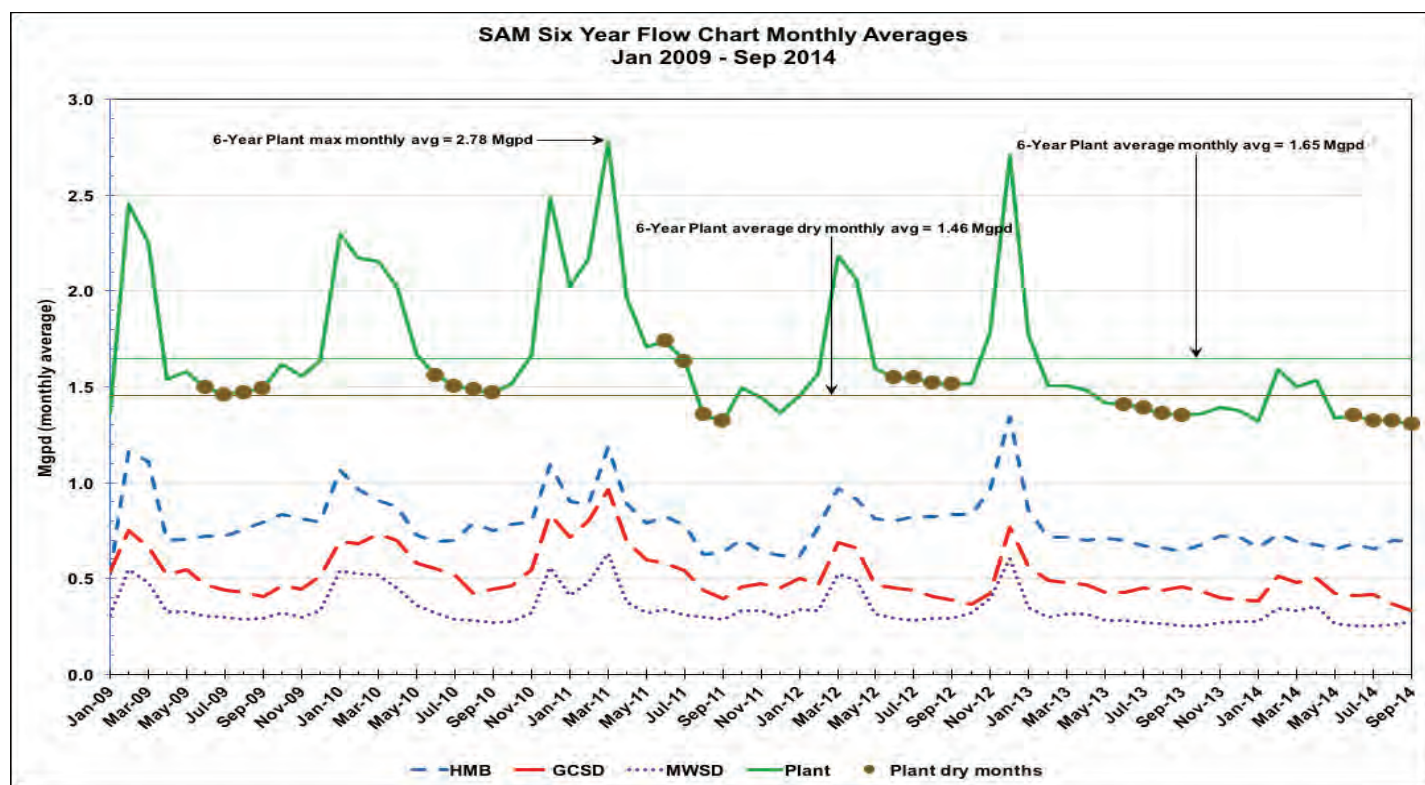




## Appendix 3: SAM 6-Year Monthly Flow Data for Jan 2009 to Sep 2017.

SAM MEMBER AGENCY FLOW DATA - JAN 2009 TO SEP 2014						
Date	Monthly Flow Averages (Mgpd)				Dry month flow (Mgpd)	
	HMB	GCSD	MWSD	Plant	MWSD	Plant
Jan-09	0.522	0.533	0.311	1.366		
Feb-09	1.161	0.749	0.547	2.457		
Mar-09	1.111	0.664	0.478	2.253		
Apr-09	0.698	0.517	0.325	1.540		
May-09	0.703	0.546	0.328	1.577		
Jun-09	0.722	0.467	0.306	1.495	0.306	1.495
Jul-09	0.722	0.441	0.295	1.458	0.295	1.458
Aug-09	0.754	0.429	0.287	1.470	0.287	1.470
Sep-09	0.796	0.406	0.292	1.494	0.292	1.494
Oct-09	0.836	0.461	0.319	1.616		
Nov-09	0.811	0.446	0.300	1.557		
Dec-09	0.795	0.511	0.329	1.635		
Jan-10	1.067	0.690	0.538	2.295		
Feb-10	0.964	0.682	0.524	2.170		
Mar-10	0.908	0.732	0.517	2.157		
Apr-10	0.876	0.699	0.452	2.027		
May-10	0.729	0.581	0.359	1.669		
Jun-10	0.692	0.549	0.320	1.561	0.320	1.561
Jul-10	0.700	0.515	0.288	1.503	0.288	1.503
Aug-10	0.786	0.423	0.279	1.488	0.279	1.488
Sep-10	0.752	0.447	0.268	1.467	0.268	1.467
Oct-10	0.782	0.462	0.275	1.519		
Nov-10	0.796	0.544	0.323	1.663		
Dec-10	1.094	0.836	0.557	2.487		
Jan-11	0.902	0.713	0.409	2.024		
Feb-11	0.886	0.800	0.478	2.164		
Mar-11	1.183	0.963	0.630	2.776		
Apr-11	0.890	0.695	0.377	1.962		
May-11	0.790	0.599	0.320	1.709		
Jun-11	0.820	0.582	0.338	1.740	0.338	1.740
Jul-11	0.780	0.543	0.310	1.633	0.310	1.633
Aug-11	0.623	0.438	0.295	1.356	0.295	1.356
Sep-11	0.637	0.395	0.288	1.320	0.288	1.320
Oct-11	0.703	0.457	0.332	1.492		
Nov-11	0.644	0.472	0.330	1.446		
Dec-11	0.618	0.449	0.299	1.366		
Jan-12	0.619	0.502	0.336	1.457		
Feb-12	0.766	0.467	0.334	1.567		
Mar-12	0.970	0.686	0.525	2.181		
Apr-12	0.914	0.658	0.489	2.061		
May-12	0.812	0.469	0.314	1.595		
Jun-12	0.802	0.450	0.294	1.546	0.294	1.546
Jul-12	0.823	0.441	0.282	1.546	0.282	1.546
Aug-12	0.824	0.403	0.292	1.519	0.292	1.519
Sep-12	0.836	0.388	0.290	1.514	0.290	1.514
Oct-12	0.835	0.363	0.320	1.518		
Nov-12	0.966	0.423	0.394	1.783		
Dec-12	1.340	0.767	0.602	2.709		
Jan-13	0.858	0.563	0.351	1.772		
Feb-13	0.714	0.492	0.299	1.505		
Mar-13	0.715	0.479	0.312	1.506		
Apr-13	0.700	0.465	0.316	1.481		
May-13	0.707	0.430	0.281	1.418		
Jun-13	0.701	0.426	0.281	1.408	0.281	1.408
Jul-13	0.669	0.450	0.270	1.389	0.270	1.389
Aug-13	0.657	0.438	0.264	1.359	0.264	1.359
Sep-13	0.640	0.457	0.254	1.351	0.254	1.351
Oct-13	0.678	0.432	0.251	1.361		
Nov-13	0.721	0.401	0.272	1.394		
Dec-13	0.713	0.389	0.273	1.375		
Jan-14	0.660	0.383	0.275	1.318		
Feb-14	0.735	0.514	0.343	1.592		
Mar-14	0.691	0.476	0.331	1.498		
Apr-14	0.678	0.499	0.356	1.533		
May-14	0.655	0.419	0.265	1.339		
Jun-14	0.682	0.411	0.255	1.348	0.255	1.348
Jul-14	0.654	0.416	0.253	1.323	0.253	1.323
Aug-14	0.697	0.366	0.260	1.323	0.260	1.323
Sep-14	0.694	0.333	0.277	1.305	0.277	1.305
<b>Totals</b>	<b>54.379</b>	<b>35.692</b>	<b>23.734</b>	<b>113.806</b>	<b>6.838</b>	<b>34.916</b>
Minimum	0.522	0.333	0.251	1.305	0.253	1.305
Average	0.788	0.517	0.344	1.649	0.285	1.455
Maximum	1.340	0.963	0.630	2.776	0.338	1.740
<b>Distribution</b>	<b>47.8%</b>	<b>31.4%</b>	<b>20.9%</b>	<b>100.0%</b>	<b>19.6%</b>	<b>100.0%</b>

## Appendix 4: SAM 6-Year Monthly Flow Charts for Jan 2009 to Sep 2017.



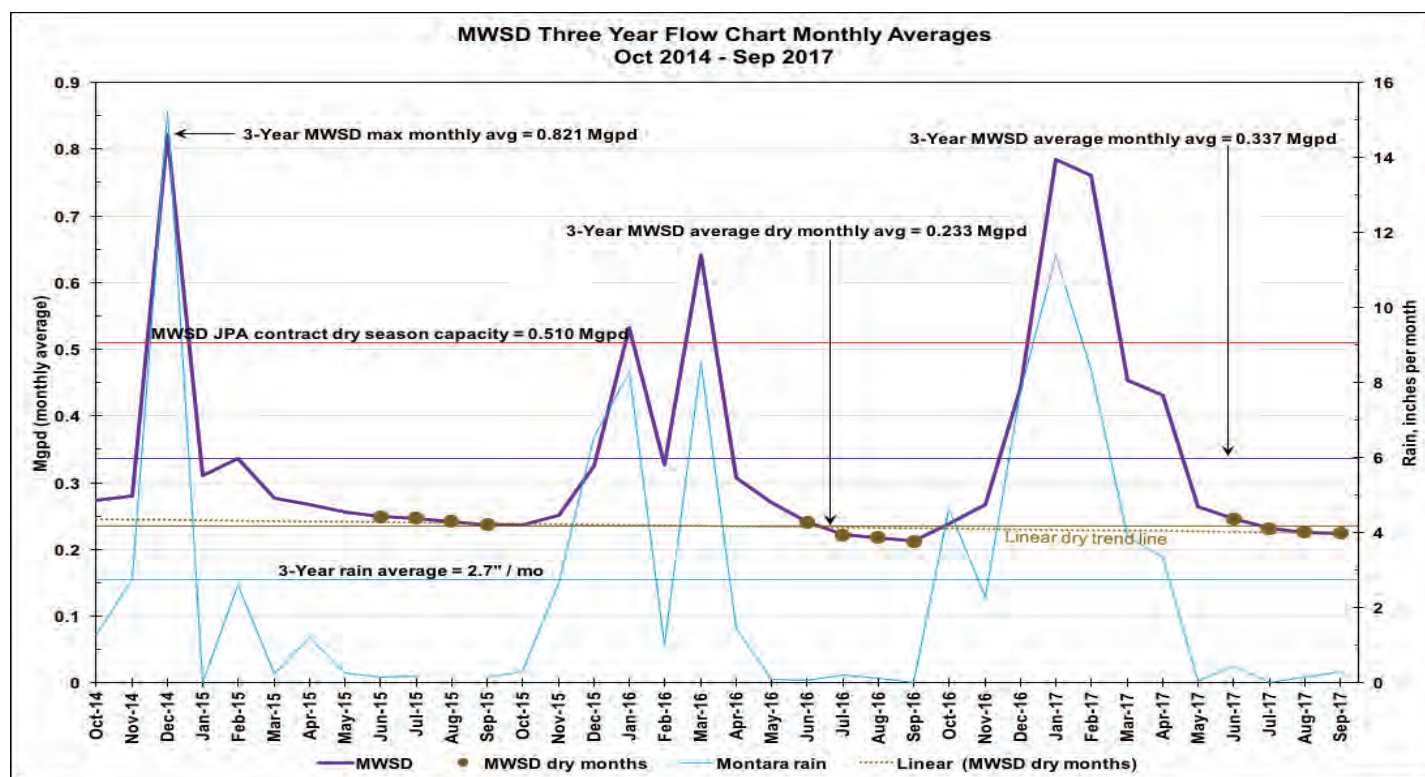
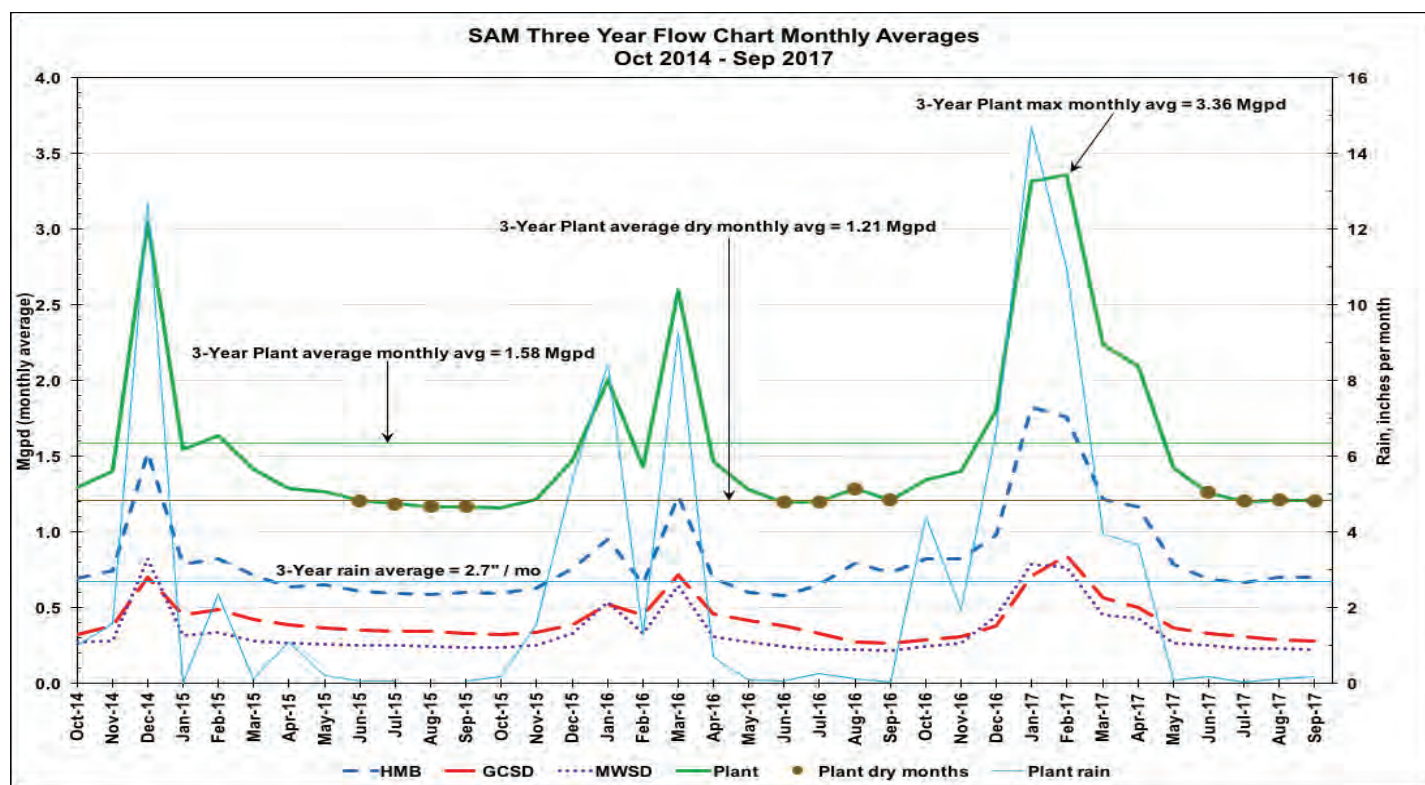


## Appendix 5: SAM 3-Year Monthly Flow Data for Oct 2014 to Sep 2017.

SAM MEMBER AGENCY FLOW DATA - OCT 2014 TO SEP 2017									
	Monthly Flow Averages for 3 Years (Mgpd)				Rain (inches/month)			Dry month flow (Mgpd)	
Date	HMB	GCSD	MWSD	Plant	Plant	Portola	Montara	MWSD	Plant
Oct-14	0.695	0.324	0.273	1.293	0.99	0.75	1.26		
Nov-14	0.743	0.376	0.280	1.399	1.58	1.80	2.75		
Dec-14	1.522	0.696	0.821	3.040	12.69	8.91	15.19		
Jan-15	0.785	0.448	0.311	1.544	0.00	0.00	0.00		
Feb-15	0.818	0.482	0.336	1.636	2.33	2.44	2.60		
Mar-15	0.712	0.424	0.277	1.413	0.11	0.14	0.24		
Apr-15	0.633	0.388	0.267	1.288	1.07	0.98	1.22		
May-15	0.649	0.361	0.256	1.266	0.20	0.11	0.26		
Jun-15	0.607	0.349	0.249	1.205	0.05	0.13	0.16	0.249	1.205
Jul-15	0.591	0.343	0.247	1.182	0.06	0.04	0.18	0.247	1.182
Aug-15	0.585	0.340	0.242	1.167				0.242	1.167
Sep-15	0.598	0.329	0.237	1.164	0.06	0.06	0.14	0.237	1.164
Oct-15	0.595	0.324	0.237	1.157	0.17	0.22	0.29		
Nov-15	0.628	0.335	0.251	1.214	1.55	1.72	2.67		
Dec-15	0.755	0.388	0.325	1.468	5.40	4.51	6.56		
Jan-16	0.946	0.520	0.532	1.999	8.43	6.45	8.28		
Feb-16	0.657	0.446	0.326	1.429	1.27	0.86	1.01		
Mar-16	1.233	0.717	0.641	2.591	9.24	7.45	8.53		
Apr-16	0.695	0.460	0.308	1.463	0.69	1.22	1.44		
May-16	0.597	0.414	0.270	1.280	0.09	0.05	0.09		
Jun-16	0.578	0.375	0.241	1.193	0.06	0.03	0.06	0.241	1.193
Jul-16	0.648	0.328	0.222	1.198	0.26	0.11	0.20	0.222	1.198
Aug-16	0.795	0.272	0.218	1.284	0.11	0.13	0.12	0.218	1.284
Sep-16	0.730	0.265	0.212	1.207	0.04	0.02	0.02	0.212	1.207
Oct-16	0.821	0.284	0.239	1.344	4.41	3.80	4.64		
Nov-16	0.821	0.308	0.267	1.397	1.93	2.49	2.29		
Dec-16	0.975	0.379	0.442	1.796	6.66	4.18	7.77		
Jan-17	1.821	0.706	0.784	3.311	14.68	9.06	11.37		
Feb-17	1.754	0.843	0.761	3.358	10.96	7.29	8.36		
Mar-17	1.211	0.567	0.453	2.232	3.95	3.84	3.90		
Apr-17	1.160	0.501	0.431	2.092	3.65	3.31	3.34		
May-17	0.787	0.367	0.264	1.418	0.08	0.01	0.04		
Jun-17	0.686	0.325	0.246	1.257	0.17	0.42	0.47	0.246	1.257
Jul-17	0.666	0.304	0.231	1.201	0.04	0.04	0.02	0.231	1.201
Aug-17	0.697	0.284	0.226	1.207	0.12	0.11	0.14	0.226	1.207
Sep-17	0.702	0.280	0.224	1.206	0.17	0.14	0.29	0.224	1.206
Totals	29.896	14.851	12.147	56.899	93.27	72.82	95.90	2.795	14.471
Minimum	0.578	0.265	0.212	1.157	0.00	0.00	0.00	0.212	1.164
Average	0.830	0.413	0.337	1.581	2.66	2.08	2.74	0.233	1.206
Maximum	1.821	0.843	0.821	3.358	14.68	9.06	15.19	0.249	1.284
Distribution	52.5%	26.1%	21.3%	100.0%					
	3-Year Wet Season Rain Avgs				3-Year Dry Season Rain Averages			2-Year Wet Rain Avgs	
	Rain (inches/month)				Rain (inches/month)			Rain (inches/month)	
	Plant	Portola	Montara		Plant	Portola	Montara	Plant	Montara
Totals	80.78	61.14	81.52		1.14	1.23	1.80	42.60	47.83
Minimum	0.00	0.00	0.00		0.04	0.02	0.02	0.00	0.00
Average	5.39	4.08	5.43		0.10	0.10	0.15	4.26	4.78
Maximum	14.68	9.06	15.19		0.26	0.42	0.47	12.69	15.19



## Appendix 6: SAM 3-Year Monthly Flow Charts for Oct 2014 to Sep 2017.







## Appendix 7: SAM 1-Year and 2017 YTD Monthly Flow Data.

SAM MEMBER AGENCY FLOW DATA - OCT 2016 TO SEP 2017									
Date	Monthly Flow Averages for 1 Year (Mgpd)				Rain (inches/month)			Dry month flow (Mgpd)	
	HMB	GCSD	MWSD	Plant	Plant	Portola	Montara	MWSD	Plant
Oct-16	0.821	0.284	0.239	1.344	4.41	3.80	4.64		
Nov-16	0.821	0.308	0.267	1.397	1.93	2.49	2.29		
Dec-16	0.975	0.379	0.442	1.796	6.66	4.18	7.77		
Jan-17	1.821	0.706	0.784	3.311	14.68	9.06	11.37		
Feb-17	1.754	0.843	0.761	3.358	10.96	7.29	8.36		
Mar-17	1.211	0.567	0.453	2.232	3.95	3.84	3.90		
Apr-17	1.160	0.501	0.431	2.092	3.65	3.31	3.34		
May-17	0.787	0.367	0.264	1.418	0.08	0.01	0.04		
Jun-17	0.686	0.325	0.246	1.257	0.17	0.42	0.47	0.246	1.257
Jul-17	0.666	0.304	0.231	1.201	0.04	0.04	0.02	0.231	1.201
Aug-17	0.697	0.284	0.226	1.207	0.12	0.11	0.14	0.226	1.207
Sep-17	0.702	0.280	0.224	1.206	0.17	0.14	0.29	0.224	1.206
<b>Totals</b>	<b>12.101</b>	<b>5.147</b>	<b>4.568</b>	<b>21.819</b>	<b>46.82</b>	<b>34.69</b>	<b>42.63</b>	<b>0.927</b>	<b>4.871</b>
Minimum	0.666	0.280	0.224	1.201	0.04	0.01	0.02	0.224	1.201
<b>Average</b>	<b>1.008</b>	<b>0.429</b>	<b>0.381</b>	<b>1.818</b>	<b>3.90</b>	<b>2.89</b>	<b>3.55</b>	<b>0.232</b>	<b>1.218</b>
Maximum	1.821	0.843	0.784	3.358	14.68	9.06	11.37	0.246	1.257
<b>Distribution</b>	<b>55.5%</b>	<b>23.6%</b>	<b>20.9%</b>	<b>100.0%</b>					

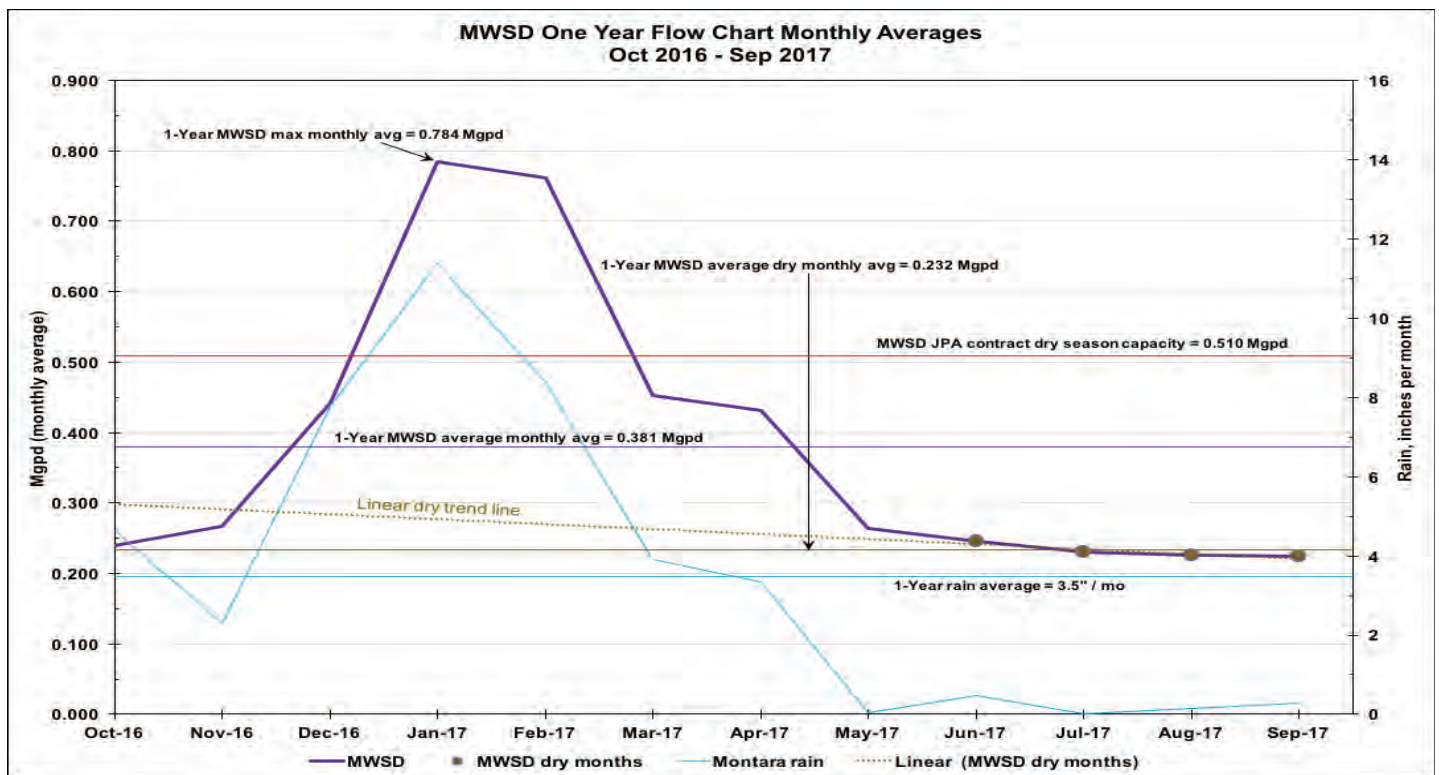
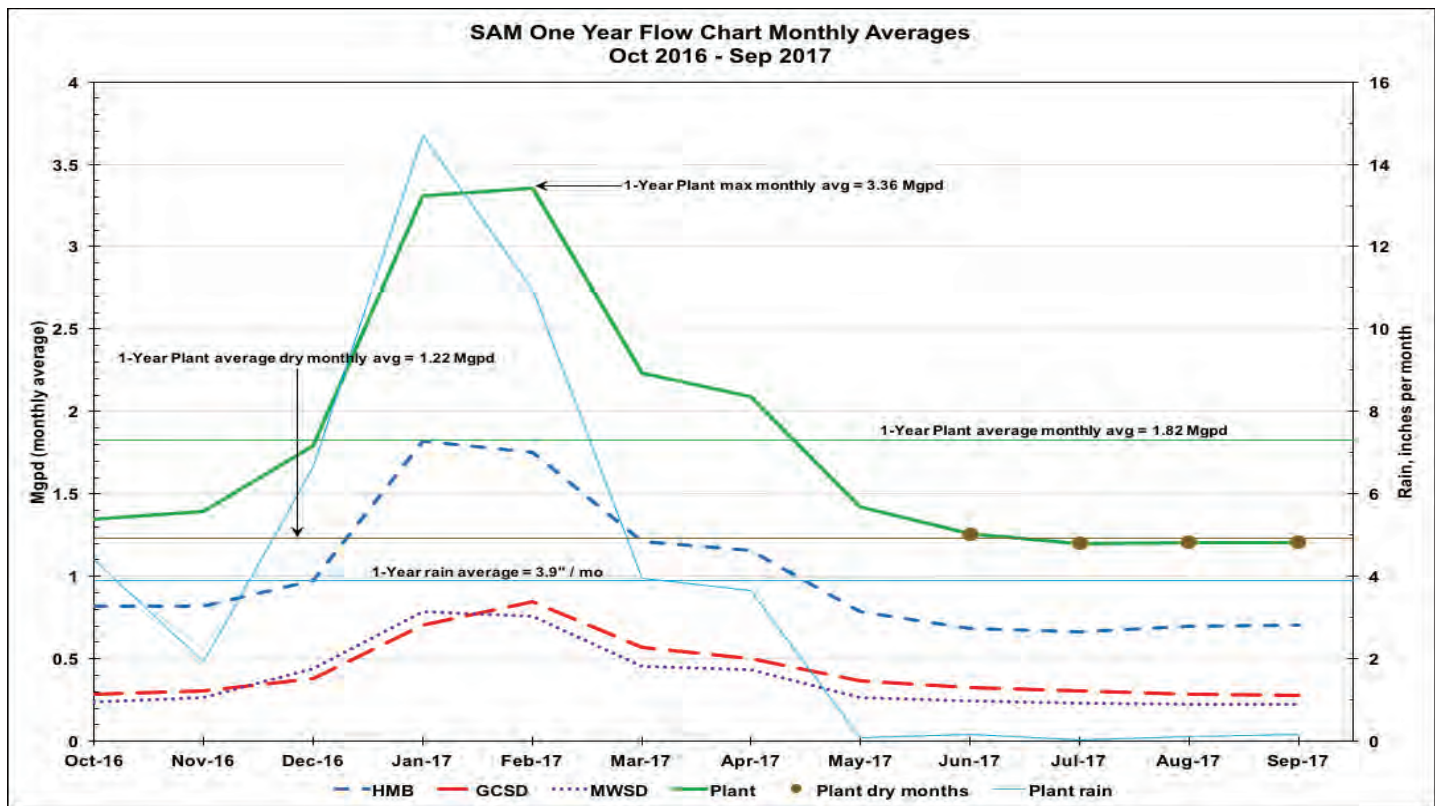
  

	YTD Flow Averages (Mgpd)				Rain (inches/month)		
	HMB	GCSD	MWSD	Plant	Plant	Portola	Montara
Minimum	0.666	0.280	0.224	1.201	0.04	0.01	0.02
<b>Average</b>	<b>1.054</b>	<b>0.464</b>	<b>0.402</b>	<b>1.920</b>	<b>3.76</b>	<b>2.69</b>	<b>3.10</b>
<b>Dry avg</b>			<b>0.232</b>	<b>1.218</b>			
Maximum	1.821	0.843	0.784	3.358	14.68	9.06	11.37
<b>Distribution</b>	<b>54.9%</b>	<b>24.2%</b>	<b>20.9%</b>	<b>100.0%</b>			

1-Year and YTD Dry Season Rain Averages (Mgpd)			
	Rain (inches/month)		
	Plant	Portola	Montara
<b>Totals</b>	<b>0.50</b>	<b>0.71</b>	<b>0.92</b>
Minimum	0.04	0.04	0.02
<b>Average</b>	<b>0.13</b>	<b>0.18</b>	<b>0.23</b>
Maximum	0.17	0.42	0.47

## Appendix 8: SAM 1-Year Monthly Flow Charts for Oct 2016 to Sep 2017.





## Appendix 9: SAM Annual Flow Averages Data for Jan 2009 – Sep 2017.

### SAM Annual Flow Data for Jan 2009 to Sep 2017

Date	Annual Flow Averages (Mgpd)				Rain Averages (inches/month)				Dry month flow (Mgpd)			Wet month flow (Mgpd)	
	HMB	GCSD	MWSD	Plant	Plant	Portola	Montara		Plant	MWSD		Plant	MWSD
2009	0.803	0.514	0.343	1.660					1.479	0.295		2.025	0.445
2010	0.846	0.597	0.392	1.834					1.505	0.289		1.963	0.442
2011	0.790	0.592	0.367	1.749					1.512	0.308		2.223	0.479
2012	0.876	0.501	0.373	1.750					1.531	0.290		1.603	0.365
2013	0.706	0.452	0.285	1.443					1.377	0.267		1.855	0.392
2014	0.759	0.434	0.332	1.526	5.09	3.82	6.40		1.325	0.261		1.435	0.299
2015	0.663	0.376	0.270	1.309	0.92	0.86	1.19		1.180	0.244		1.806	0.405
2016	0.791	0.397	0.327	1.515	2.77	2.23	2.87		1.221	0.223		1.740	0.415
2017	1.054	0.464	0.402	1.920	3.76	2.69	3.10		1.218	0.232		2.419	0.541
Minimum	0.663	0.376	0.270	1.309	0.92	0.86	1.19		1.180	0.223		1.435	0.299
Average	0.810	0.481	0.343	1.634	3.13	2.40	3.39		1.372	0.268		1.897	0.420
Maximum	1.054	0.597	0.402	1.920	5.09	3.82	6.40		1.531	0.308		2.419	0.541
Distribution	49.5%	29.4%	21.0%	100.0%					100.0%	19.5%		100.0%	22.2%

2014 rain data is for Oct-Dec only.

2017 flow and rain data is for Jan-Sep only and reflects higher rainfall during these months.

Dry month flow data are from Jun-Sep each year.

Wet month flow data are from Nov-Mar each year.

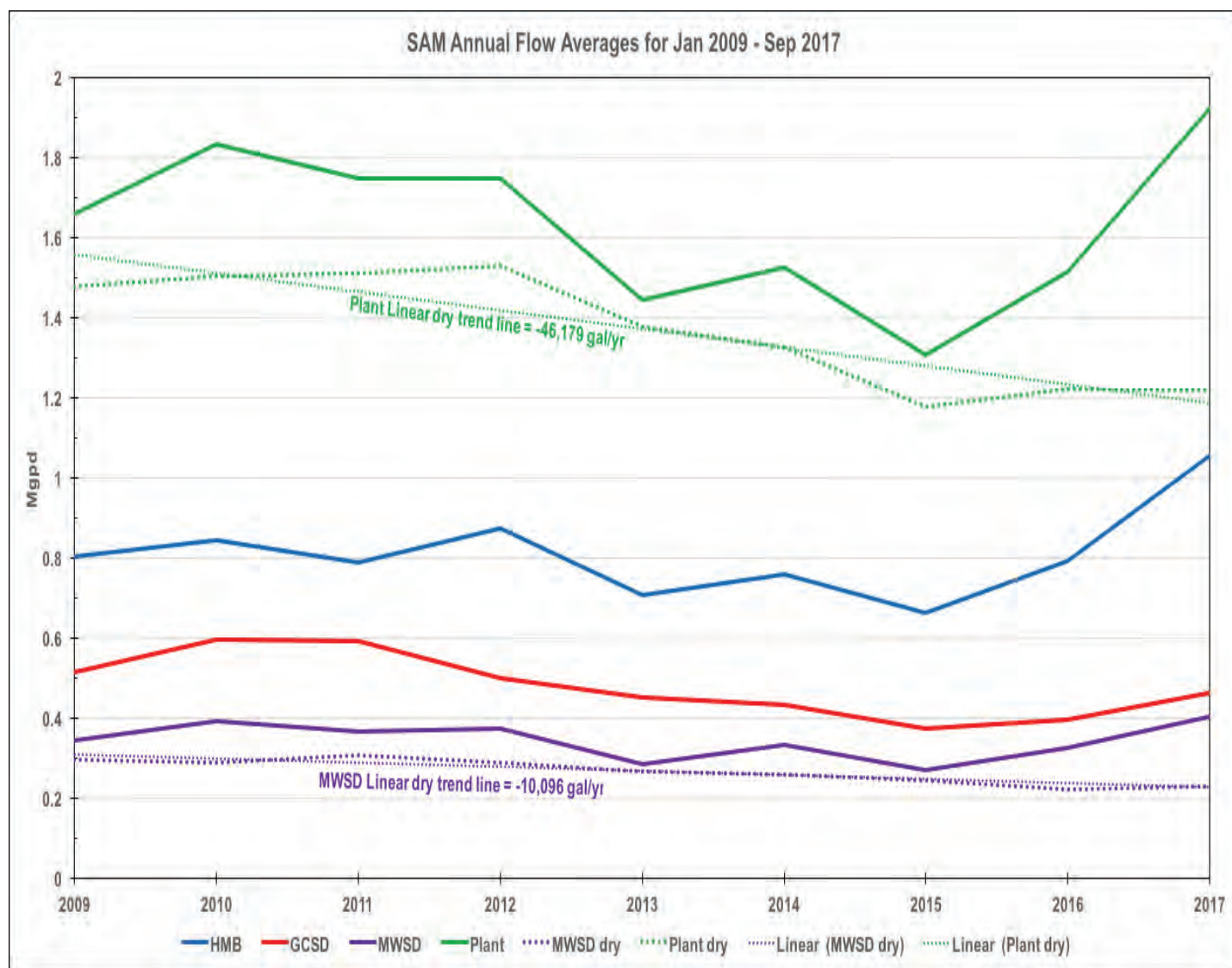
#### Trend line calculations for dry months

	SAM Plant	MWSD
Ann. flow slope	-0.046179	-0.010096
gal/yr	-46,179	-10,096
R value	0.7986	0.8552
Correlation	Fair	Fair

#### Trend line calculations for wet months

	SAM Plant	MWSD
Ann. flow slope	-0.001579	0.001499
gal/yr	-1,579	1,499
R value	0.0002	0.0035
Correlation	Poor	Poor

## Appendix 10: SAM Annual Flow Averages for Jan 2009 – Sep 2017.







## Appendix 11: SAM 5-Month Daily Flow Data for 2016/17 Wet Season.

SAM MEMBER AGENCY FLOW DATA - NOV 2016 TO MAR 2017 (wet season)									
Date	HMB	Daily Flow Averages for 1 Year (Mgpd)				Difference	Rain (inches/day)		
		CCSD	MVWS	Total	Plant		Plant	Portola	Montara
11/1/16	0.913	0.329	0.303	1.545	1.358	0.187	0.14	0.09	0.09
11/2/16	0.832	0.298	0.258	1.388	1.274	0.114	0.01	0.01	0.00
11/3/16	0.842	0.288	0.242	1.343	1.196	0.147	0.00	0.00	0.00
11/4/16	0.805	0.286	0.237	1.328	1.297	0.031	0.00	0.00	0.00
11/5/16	0.858	0.320	0.253	1.431	1.418	0.013	0.01	0.00	0.00
11/6/16	0.842	0.321	0.262	1.425	1.408	0.017	0.02	0.01	0.06
11/7/16	0.770	0.283	0.228	1.281	1.323	-0.042	0.00	0.00	0.00
11/8/16	0.757	0.266	0.224	1.247	1.168	0.079	0.00	0.00	0.00
11/9/16	0.758	0.278	0.259	1.594	1.643	-0.045	0.01	0.00	0.00
11/10/16	0.764	0.274	0.215	1.253	1.206	0.047	0.01	0.00	0.00
11/11/16	0.813	0.297	0.229	1.338	1.307	0.031	0.01	0.01	0.00
11/12/16	0.848	0.311	0.241	1.407	1.326	0.081	0.00	0.00	0.00
11/13/16	0.849	0.323	0.256	1.428	1.411	0.017	0.00	0.00	0.00
11/14/16	0.752	0.263	0.221	1.236	1.326	-0.090	0.01	0.00	0.00
11/15/16	0.766	0.260	0.220	1.246	1.288	-0.042	0.01	0.04	0.05
11/16/16	0.771	0.271	0.218	1.259	1.244	0.015	0.01	0.00	0.00
11/17/16	0.753	0.259	0.224	1.252	1.224	0.028	0.00	0.00	0.00
11/18/16	0.738	0.280	0.213	1.231	1.296	-0.065	0.00	0.00	0.00
11/19/16	0.858	0.325	0.329	1.512	1.553	-0.041	0.49	0.40	0.70
11/20/16	0.877	0.343	0.340	1.612	1.643	-0.031	0.33	0.25	0.12
11/21/16	0.751	0.297	0.277	1.326	1.355	-0.029	0.01	0.00	0.00
11/22/16	0.734	0.291	0.249	1.274	1.357	-0.083	0.20	0.27	0.20
11/23/16	0.832	0.322	0.284	1.438	1.517	-0.079	0.03	0.01	0.01
11/24/16	0.828	0.324	0.291	1.442	1.434	0.008	0.01	0.00	0.00
11/25/16	0.767	0.308	0.254	1.329	1.394	-0.065	0.00	0.00	0.00
11/26/16	0.822	0.283	0.242	1.269	1.324	-0.052	0.00	0.00	0.00
11/27/16	1.169	0.428	0.424	2.021	2.006	0.015	0.12	0.28	0.11
11/28/16	0.904	0.360	0.346	1.610	1.685	-0.075	0.12	0.18	0.11
11/29/16	0.769	0.315	0.302	1.387	1.401	-0.014	0.00	0.00	0.00
11/30/16	0.730	0.321	0.275	1.326	1.440	-0.114	0.03	0.04	0.05
12/1/16	0.757	0.295	0.267	1.319	1.329	0.010	0.01	0.00	0.00
12/2/16	0.744	0.283	0.242	1.259	1.324	-0.065	0.00	0.00	0.00
12/3/16	0.788	0.303	0.262	1.353	1.348	0.005	0.00	0.00	0.00
12/4/16	0.819	0.324	0.266	1.409	1.432	-0.023	0.00	0.00	0.00
12/5/16	0.892	0.392	0.273	2.039	2.034	0.005	0.13	0.09	0.66
12/6/16	0.706	0.269	0.235	1.210	1.300	-0.090	0.01	0.00	0.00
12/7/16	0.676	0.285	0.237	1.198	1.383	-0.185	0.20	0.31	0.32
12/8/16	0.893	0.322	0.345	1.560	1.699	-0.139	0.26	0.26	0.50
12/9/16	0.873	0.327	0.362	1.562	1.678	-0.116	0.17	0.18	0.20
12/10/16	1.743	0.643	0.893	3.279	3.477	-0.198	2.47	1.57	2.65
12/11/16	1.220	0.484	0.635	2.339	2.474	-0.135	0.01	0.00	0.00
12/12/16	0.911	0.358	0.440	1.709	1.866	-0.157	0.00	0.00	0.00
12/13/16	0.836	0.346	0.379	1.561	1.656	-0.095	0.06	0.13	0.13
12/14/16	0.883	0.360	0.400	1.643	1.754	-0.111	0.06	0.07	0.07
12/15/16	1.874	0.677	1.010	3.561	3.751	-0.190	2.75	1.13	1.87
12/16/16	1.713	0.547	0.884	3.247	3.444	-0.197	0.00	0.00	0.00
12/17/16	1.130	0.433	0.647	2.210	2.297	-0.087	0.00	0.00	0.00
12/18/16	1.054	0.397	0.543	1.994	2.021	-0.027	0.00	0.00	0.00
12/19/16	0.905	0.332	0.468	1.707	1.707	0.000	0.00	0.00	0.00
12/20/16	0.880	0.316	0.434	1.630	1.642	-0.012	0.00	0.00	0.00
12/21/16	0.847	0.320	0.403	1.570	1.623	-0.053	0.00	0.00	0.00
12/22/16	0.845	0.324	0.382	1.551	1.541	0.010	0.00	0.00	0.00
12/23/16	1.281	0.479	0.583	2.343	2.466	-0.123	0.66	0.53	0.97
12/24/16	1.145	0.462	0.513	2.120	2.209	-0.089	0.00	0.00	0.00
12/25/16	0.884	0.400	0.422	1.706	1.796	-0.090	0.00	0.00	0.00
12/26/16	0.910	0.389	0.390	1.689	1.713	-0.024	0.00	0.00	0.00
12/27/16	0.867	0.368	0.394	1.594	1.683	-0.089	0.00	0.00	0.00
12/28/16	0.836	0.361	0.329	1.526	1.584	-0.058	0.00	0.00	0.00
12/29/16	0.849	0.350	0.316	1.515	1.494	0.021	0.00	0.00	0.00
12/30/16	0.818	0.362	0.307	1.487	1.568	-0.081	0.00	0.00	0.00
12/31/16	0.831	0.364	0.314	1.509	1.531	-0.022	0.00	0.00	0.00
1/1/17	0.7964	0.349	0.300	1.445	1.457	-0.012	0.02	0.03	0.01
1/2/17	0.7993	0.356	0.318	1.473	1.562	-0.089	0.11	0.22	0.46
1/3/17	1.2147	0.414	0.499	2.128	2.305	-0.177	1.54	0.45	0.83
1/4/17	1.767	0.778	0.991	3.597	3.790	-0.193	0.00	0.00	0.00
1/5/17	1.3741	0.513	0.611	2.498	2.564	-0.066	0.01	0.00	0.00
1/6/17	1.0859	0.424	0.482	2.192	2.142	0.050	0.00	0.00	0.00
1/7/17	1.2696	0.481	0.512	2.963	3.448	-0.485	0.67	0.60	0.80
1/8/17	2.8262	1.014	1.584	5.424	5.662	-0.238	2.41	1.36	1.75
1/9/17	2.2981	0.836	1.158	4.292	4.546	-0.254	2.57	0.34	0.18
1/10/17	3.0683	1.103	1.390	5.561	5.834	-0.273	2.71	1.25	1.58
1/11/17	2.5476	0.972	1.191	4.711	4.960	-0.249	0.03	0.19	0.10
1/12/17	1.8440	0.939	0.963	4.069	4.271	-0.202	0.00	0.00	0.00
1/13/17	1.6651	0.713	0.717	3.095	3.205	-0.110	0.01	0.00	0.00
1/14/17	1.4738	0.657	0.614	2.745	2.752	-0.007	0.00	0.00	0.00
1/15/17	1.3505	0.513	0.560	2.183	2.183	0.000	0.01	0.00	0.00
1/16/17	1.2625	0.579	0.495	2.337	2.327	0.010	0.00	0.00	0.00
1/17/17	1.1099	0.503	0.442	2.055	2.135	-0.080	0.00	0.00	0.00
1/18/17	1.6069	0.654	0.671	2.932	3.080	-0.148	1.63	0.89	1.18
1/19/17	2.2642	0.999	1.053	3.946	3.969	-0.023	0.47	0.17	0.34
1/20/17	3.7123	1.366	1.626	6.705	6.587	0.118	0.26	0.49	1.38
1/21/17	2.5404	0.917	1.098	4.613	4.721	-0.108	0.20	0.31	0.41
1/22/17	3.3397	1.218	1.507	6.065	6.259	-0.194	0.50	0.88	1.12
1/23/17	1.2229	0.657	0.657	2.157	2.157	0.000	0.00	0.00	0.00
1/24/17	2.2404	0.831	1.061	3.932	4.020	-0.088	0.01	0.01	0.01
1/25/17	1.7240	0.703	0.684	3.111	3.246	-0.135	0.00	0.00	0.00
1/26/17	1.6545	0.650	0.595	2.855	2.791	0.064	0.00	0.00	0.00
1/27/17	1.4076	0.605	0.521	2.534	2.561	-0.027	0.00	0.00	0.00
1/28/17	1.4245	0.610	0.500	2.535	2.476	0.059	0.00	0.00	0.00
1/29/17	1.3504	0.606	0.480	2.436	2.406	0.030	0.00	0.00	0.00
1/30/17	1.2078	0.527	0.427	2.162	2.170	-0.008	0.00	0.00	0.00
1/31/17	1.4853	0.510	0.510	2.510	2.510	0.000	0.00	0.00	0.00
2/1/17	1.1100	0.493	0.382	1.985	2.096	-0.111	0.00	0.00	0.00
2/2/17	1.1463	0.503	0.383	2.032	2.039	-0.007	0.12	0.12	0.09
2/3/17	1.4009	0.615	0.488	2.504	2.504	0.000	0.00	0.00	0.00
2/4/17	1.3986	0.643	0.613	2.655	2.642	0.013	0.10	0.09	0.12
2/5/17	1.3613	0.619	0.563	2.543	2.585	-0.042			

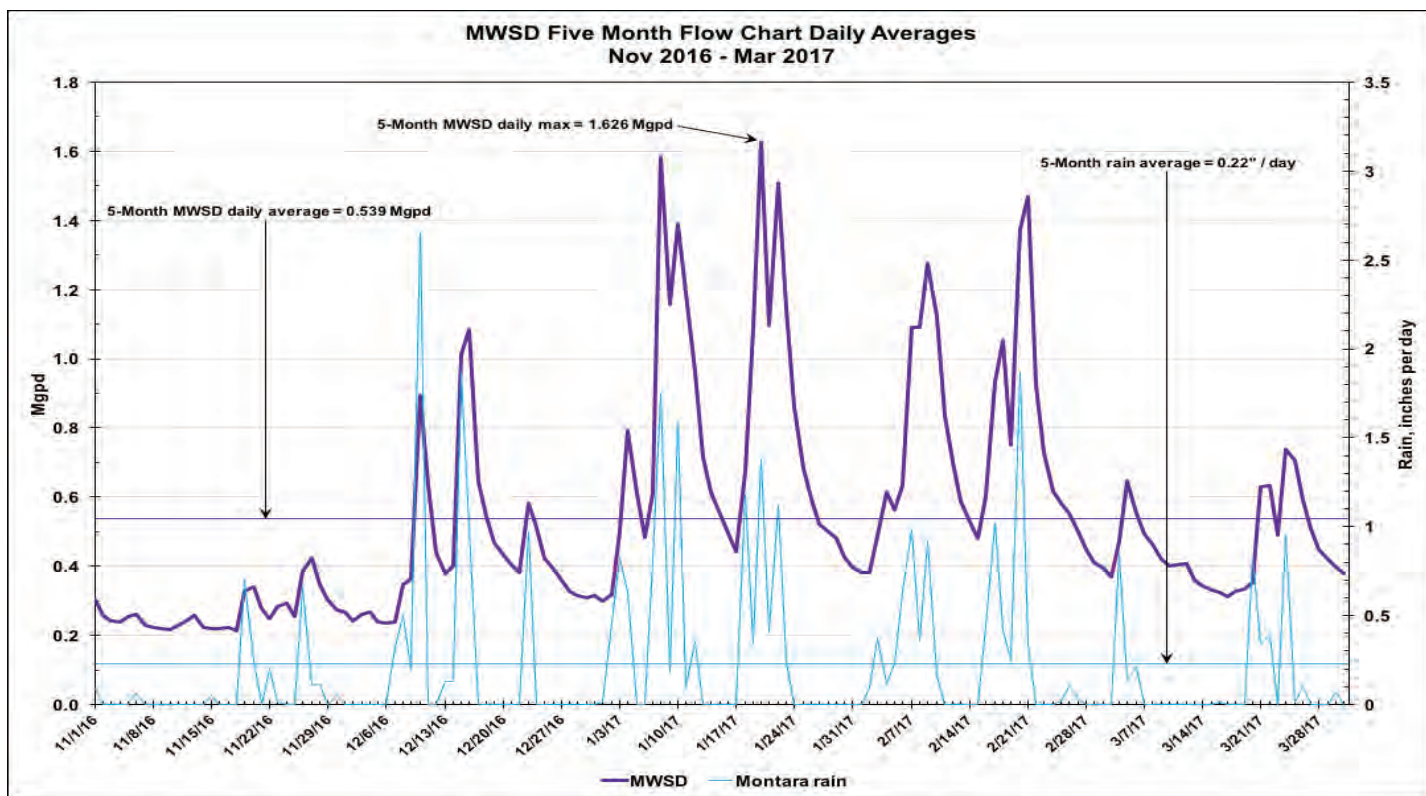
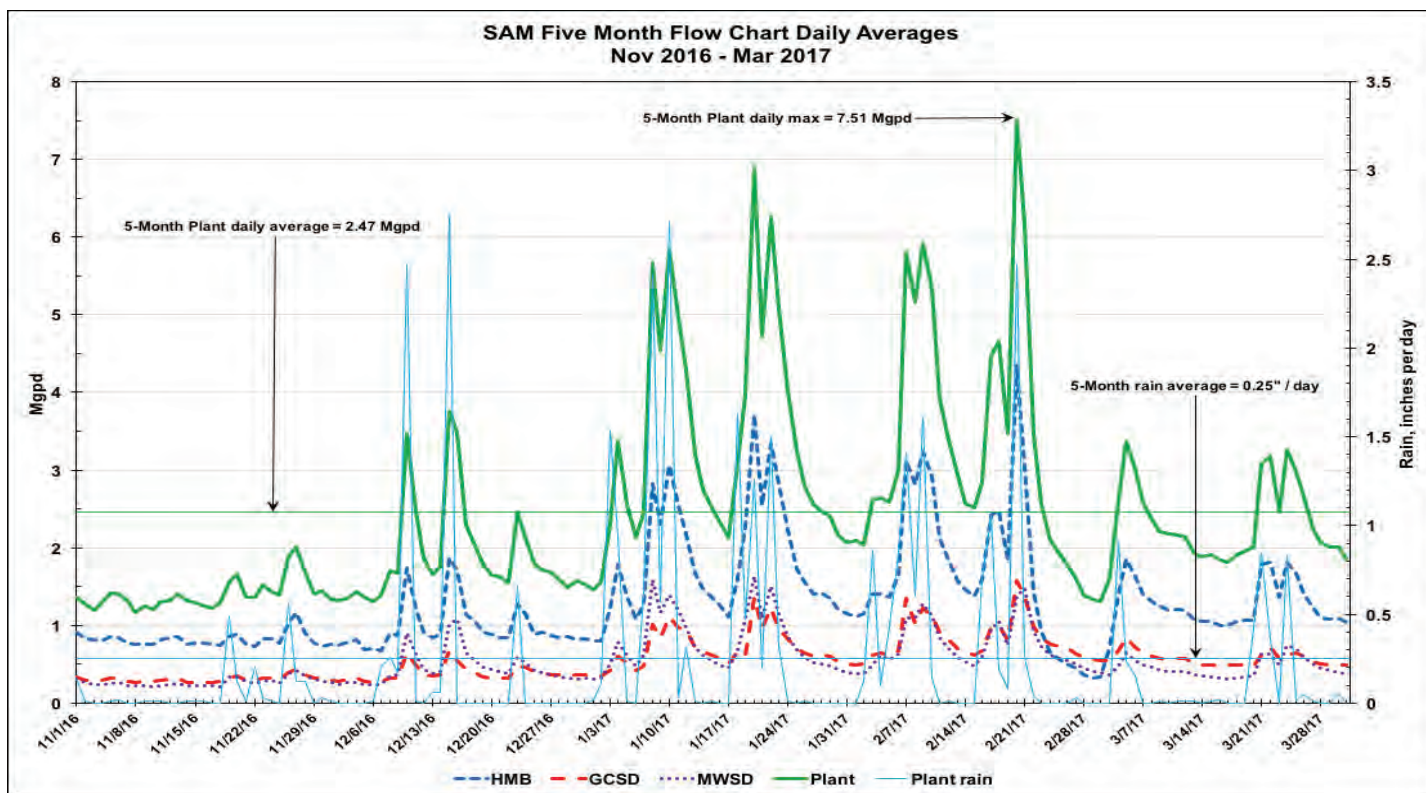


## Appendix 12: SAM 5-Month Monthly Flow Data for 2016/17 Wet Season.

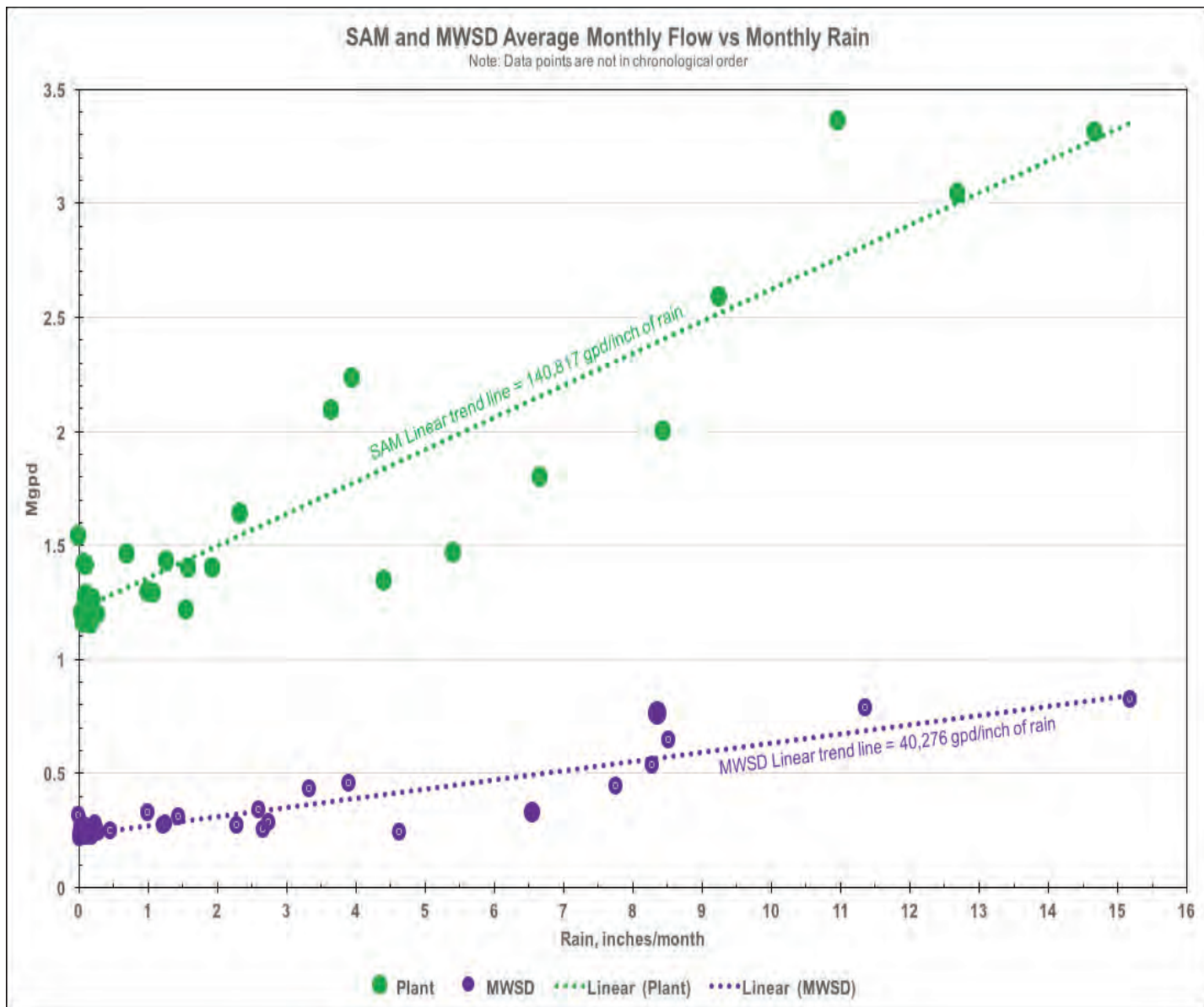
	Monthly Flow Averages for Nov 2016 (Mgpd)						Rain (inches/month)		
	HMB	GCSD	MWSD	Total 3	Plant	Difference	Plant	Portola	Montara
Totals	24.645	9.251	8.019	41.915	42.000	-0.085	1.93	2.49	2.29
Minimum	0.730	0.260	0.213	1.231	1.168	-0.114			
Average	0.821	0.308	0.267	1.397	1.400	-0.003			
Maximum	1.169	0.428	0.424	2.021	2.006	0.187			
Distribution	58.8%	22.1%	19.1%	100.0%					
	Monthly Flow Averages for Dec 2016 (Mgpd)						Rain (inches/month)		
	HMB	GCSD	MWSD	Total 3	Plant	Difference	Plant	Portola	Montara
Totals	30.214	11.753	13.704	55.671	58.191	2.520	6.66	4.18	7.77
Minimum	0.676	0.269	0.235	1.198	1.300	0.102			
Average	0.975	0.379	0.442	1.796	1.877	0.081			
Maximum	1.874	0.677	1.084	3.561	3.751	0.190			
Distribution	54.3%	21.1%	24.6%	100.0%					
	Monthly Flow Averages for Jan 2017 (Mgpd)						Rain (inches/month)		
	HMB	GCSD	MWSD	Total 3	Plant	Difference	Plant	Portola	Montara
Totals	56.452	21.876	24.314	102.642	105.835	3.193	14.69	9.06	11.37
Minimum	0.796	0.349	0.300	1.445	1.457	0.012			
Average	1.821	0.706	0.784	3.311	3.414	0.103			
Maximum	3.713	1.366	1.626	6.705	6.887	0.182			
Distribution	55.0%	21.3%	23.7%	100.0%					
	Monthly Flow Averages for Feb 2017 (Mgpd)						Rain (inches/month)		
	HMB	GCSD	MWSD	Total 3	Plant	Difference	Plant	Portola	Montara
Totals	49.122	23.594	21.306	94.022	96.507	2.485	10.96	7.29	8.36
Minimum	0.363	0.493	0.382	1.404	1.387	-0.017			
Average	1.754	0.843	0.761	3.358	3.447	0.089			
Maximum	4.341	1.571	1.469	7.287	7.511	0.224			
Distribution	52.2%	25.1%	22.7%	100.0%					
	Monthly Flow Averages for Mar 2017 (Mgpd)						Rain (inches/month)		
	HMB	GCSD	MWSD	Total 3	Plant	Difference	Plant	Portola	Montara
Totals	37.534	17.588	14.055	69.177	69.905	0.728	3.95	3.84	3.90
Minimum	0.323	0.477	0.313	1.284	1.303	-0.043			
Average	1.211	0.567	0.453	2.232	2.255	0.023			
Maximum	1.851	0.844	0.739	3.339	3.369	0.111			
Distribution	54.3%	25.4%	20.3%	100.0%					
	Rain Season (Nov 16 - Mar 17) Monthly Averages (Mgpd)						Rain (inches/month)		
	HMB	GCSD	MWSD	Total 3	Plant	Difference	Plant	Portola	Montara
Totals	197.966	84.062	81.398	363.426	372.438	9.012	38.19	26.86	33.69
Minimum	0.323	0.260	0.213	1.198	1.168	-0.030	1.93	2.49	2.29
Average	1.316	0.561	0.542	2.419	2.479	0.060	7.64	5.37	6.74
Maximum	4.341	1.571	1.626	7.287	7.511	0.224	14.69	9.06	11.37
Distribution	54.4%	23.2%	22.4%	100.0%					



## Appendix 13: SAM 5-Month Daily Flow Charts for 2016/17 Wet Season.



## Appendix 14: SAM and MWSD Average Monthly Flow vs Monthly Rain for Last 3 Years (Oct 2014 to Sep 2017).







## Appendix 15: SAM and MWSD Population Statistics and Per Capita Data for Jan 2009 – Sep 2017.

### Population Statistics for SAM and MWSD Districts

2010 Census	Pop.	HH	Pop/HH
Montara	2,909	1,109	2.6
Moss Beach	3,103	1,062	2.9
El Granada	5,467	2,098	2.6
HMB	11,324	4,149	2.7
<b>Total SAM</b>	<b>22,803</b>	<b>8,418</b>	<b>2.7</b>
<b>Total MWSD</b>	<b>6,012</b>	<b>2,171</b>	<b>2.8</b>

HH = number of households.

Population and HH values extrapolated from 2010 data using 1% AGR.					Average Annual Flows per Capita							
					Annual Flow Averages				Annual Dry Flow Averages			
SAM		MWSD			SAM		MWSD		SAM		MWSD	
Date	Pop.	HH	Pop.	HH	gpd/person	gpd/HH	gpd/person	gpd/HH	gpd/person	gpd/HH	gpd/person	gpd/HH
2009	22,577	8,335	5,952	2,150	74	199	58	160	66	177	50	137
2010	22,803	8,418	6,012	2,171	80	218	65	180	66	179	48	133
2011	23,031	8,502	6,072	2,193	76	206	60	167	66	178	51	140
2012	23,261	8,587	6,133	2,215	75	204	61	168	66	178	47	131
2013	23,494	8,673	6,194	2,237	61	166	46	128	59	159	43	119
2014	23,729	8,760	6,256	2,259	64	174	53	147	56	151	42	116
2015	23,966	8,847	6,319	2,282	55	148	43	118	49	133	39	107
2016	24,206	8,936	6,382	2,305	63	170	51	142	50	137	35	97
2017	24,448	9,025	6,446	2,328	79	213	62	173	50	135	36	100
				Minimum	55	148	43	118	49	133	35	97
				Average	70	189	55	154	59	159	43	120
				Maximum	80	218	65	180	66	179	51	140
Last 1 year	24,448	9,025	6,446	2,328	74	201	59	164	50	135	36	100

Trend line calculations for dry months		
	SAM Plant	MWSD
gpd/person/yr	-2.5	-2.1
R value	0.8713	0.9065
Correlation	Fair	Fair

## Appendix 16: SAM and MWSD Annual Flow Averages Per Capita for Jan 2009 – Sep 2017.



**From:** Ananda, Renee@Coastal  
**To:** "[Karen deMoor](#)"  
**Subject:** RE: meeting request  
**Date:** Friday, December 15, 2017 9:21:00 AM

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Hello Ms. deMoor,

Yes. We are scheduled to meet with you this morning at 10:00. Please give your names to the lobby security; they will send you up to the 20<sup>th</sup> Floor. Thank you, RTA

**From:** Karen deMoor [mailto:[karen@resistdensity.org](mailto:karen@resistdensity.org)]  
**Sent:** Thursday, December 14, 2017 11:49 AM  
**To:** Ananda, Renee@Coastal  
**Subject:** Re: meeting request

Dear Ms. Ananda (Renee),

We're looking forward to meeting you tomorrow at 10am at your offices in San Francisco. It will just be myself, Dolores Silva and JQ Oeswein. Please confirm this time still works for you and if you could let us know who will be joining from your office, we'd appreciate it.

Thank you again for making the time to meet with us,

Karen

On Thu, Nov 30, 2017 at 4:59 PM, Karen deMoor <[karen@resistdensity.org](mailto:karen@resistdensity.org)> wrote:  
Hi Ms. Ananda (Renee),

Yes 12/15 at 10am would work really well for us. Thank you very much for making the time. I will be joined with my colleagues Dolores Silva, JQ Oeswein and Harald Hermann. Please let me know who else may join us from your offices.

Thank you again - we look forward to meeting you!

Karen

On Wed, Nov 29, 2017 at 6:13 PM, Ananda, Renee@Coastal  
<[Renee.Ananda@coastal.ca.gov](mailto:Renee.Ananda@coastal.ca.gov)> wrote:  
Hello Ms. de Moor,

We are available to meet with you on Friday December 15, 2017 at 10:00 am in our San Francisco office. Please confirm whether or not that will work for you; if it doesn't let me know alternative dates and times that week between December 12<sup>th</sup> and December 15<sup>th</sup>.

Thank you. RTA

**From:** Karen deMoor [mailto:[karen@resistdensity.org](mailto:karen@resistdensity.org)]

**Sent:** Monday, November 27, 2017 6:42 PM  
**To:** Ananda, Renee@Coastal  
**Subject:** Re: meeting request

Hello and Happy Holidays!

I hope you had a nice Thanksgiving. I wanted to follow up to see if you might have some dates for scheduling a meeting - we're looking forward to meeting you.

Thank you!

Karen

On Wed, Nov 8, 2017 at 12:29 PM, Ananda, Renee@Coastal  
<[Renee.Ananda@coastal.ca.gov](mailto:Renee.Ananda@coastal.ca.gov)> wrote:  
Hello Ms. de Moor (Karen),

We can be available to meet with you in the coming weeks. I will check with staff and get back to you regarding dates and times. Thank you for your interest. RTA

*Renée T. Ananda, Coastal Program Analyst  
California Coastal Commission – North Central Coast District  
45 Fremont Street, Suite 2000  
San Francisco, CA 94105*

*Phone – Direct: [\(415\) 904-5292](tel:4159045292) Main: [\(415\) 904-5260](tel:4159045260)  
[renee.ananda@coastal.ca.gov](mailto:renee.ananda@coastal.ca.gov)*

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**From:** Karen deMoor [mailto:[karen@resistdensity.org](mailto:karen@resistdensity.org)]  
**Sent:** Monday, November 06, 2017 6:31 PM  
**To:** Ananda, Renee@Coastal  
**Subject:** meeting request

Hi Ms. Ananda,

I'm writing to see if I and my colleague could schedule a meeting with you to discuss the MidPen proposed housing development in Moss Beach. We've been in communication via email over these past many months, but we'd like to share our data and research with you in person to give you better understanding of our concerns with this project. Would you be able to meet with us some time in the coming weeks - we are happy to meet at your office or a convenient location for you, or if you are interested in seeing the site location, we'd be happy to meet here in Moss Beach.

Thank you for considering - I look forward to hearing from you!

my best,



Karen

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Karen deMoor  
Board Member | **Resist Density** | [www.ResistDensity.org](http://www.ResistDensity.org)  
*Sensible planning and protection for the SM County Midcoast!*

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November 15, 2017

Mr. Andrew Bielak  
MidPen Housing Corporation  
303 Vintage Park Drive, Suite 250  
Foster City, CA 95131

Dear Mr. Bielak:

**SUBJECT:** Summary of Comments and Questions Received at a Public Workshop held on September 20, 2017 regarding a Proposed Planned Unit Development Re-Zoning Located on a Vacant Parcel at 1993 Carlos Street in the unincorporated Moss Beach area of San Mateo County

APN 037-022-070; County File Number PRE 2017-00032

Thank you for your participation in the public workshop. As discussed in Section 6415.5 of the County Zoning Regulations, the public workshop is intended to allow community members and public agency representatives the opportunity to provide an applicant with project input before the preparation of final development plans. The purpose of this letter is to summarize the comments received at the workshop and include additional comments received from other reviewing agencies and interested parties.

Let me emphasize that the purpose of this summary letter is not to render a decision on the merits of this project. Nor is this letter intended to serve as a substitute for future staff analysis if or when a project application is submitted to the County. There were many questions and concerns raised by the community. It is hoped that these questions/issues can be addressed by the project design or supporting analysis if/when an application is submitted.

**Key Comments and Concerns of the Community:**

Due to the variety of comments received at the workshop, many similar in nature, I have summarized the various comments and organized them into relevant categories, although there may be some overlap of issues. Copies of all submitted comments received as of the date of this letter have been included as attachments. Additionally, the comments that were being recorded on the note pads by the PCRC support staff are included in Attachment B. Comments received from government agencies are included in Attachment C.

**1. Scale (Too Big)**

- The proposed 71-unit housing development seems to be way out of scale for such a small neighborhood.



## 2. Traffic (Overall Traffic Volume on the Coastside)

- What mitigation measures will be put in place to address traffic during the construction of this project?
- Traffic analysis should include entire commute corridor beyond choke points on 92 and Pacifica.
- The Highway 1 Safety and Mobility Study was based on Caltrans data from before the opening of the tunnel. This data is 7 years old. Coastside residents frequently speak of the increase of traffic since the opening of the tunnel. Also, the MidPen project was not considered in the study at the time of its adoption (2012).
- The crossings as presented in the Cyprus Point Preliminary Traffic Assessment do not sufficiently represent the traffic impact of the MidPen project. Nor can either be presented as a future condition that mitigates the impact of the pedestrian and vehicle traffic.
- The KAI traffic study is looking only at the MidPen development and ignores surrounding measures that are planned by the County. Moss Beach is one of the access choke points for Big Wave and current plans show two additional traffic lights (Connect the Coastside) in Moss Beach.
- How will the traffic flow on Highway 1 be impacted with all the additional signals (maybe one turns into a roundabout), increased traffic volume resulting out of the MidPen and Big Wave developments (ignoring the two proposed Hotels in Montara for now), and an estimated 2 Million annual visitors to the Coastside?
- What is the impact on neighborhood streets and Farallone View Elementary School (many kids walk and bike to school and many roads do not have sidewalks) in Montara and Moss Beach as commuters and tourists try to bypass the gridlock on Highway 1 that will be created by the additional traffic measures and the MidPen and Big Wave developments?

## 3. Traffic (Project Specific - Safety)

- Blind Curve: MidPen's preliminary traffic report states that there is no room for a deceleration lane for those making a right turn from Highway 1 onto Carlos. Drivers who yield to bicyclists/pedestrians or slow as southbound cars turn left will be at risk of being rear-ended. The traffic report indicates that it might be possible to cut the hillside back to improve visibility south, but feasibility and CalTrans funding for this are not established.



- Car Traffic on Narrow Residential Streets: I am concerned that traffic from the new homes will divert to Carlos and Stetson Streets. Carlos and Stetson will become the most highly trafficked automobile, pedestrian, and bicycle routes in Moss Beach, and the roads are not wide enough to accommodate these activities safely.
- Signalization of the Highway 1/Carlos intersection, or roundabout and a pedestrian crossing in close proximity will most likely result in a significant increase of accidents. Drivers from the South do not have visibility beyond the curve, and stopped traffic or a pedestrians crossing on Highway 1 will add to the accident risk. A reduction of speed will most likely be ignored by many residents and visitors to the Coastside.
- Highway traffic calming measures would substantially improve safety at the Carlos and 16th Street intersections with Highway 1 where sight distance is limited. Lower highway speed shortens the sight distance required for safe stopping and cross-traffic movements. The Mobility Study suggests raised medians and other features for traffic calming. In addition to further analysis and refinement of Mobility Study concept plans for the area, please fully assess the feasibility of rerouting Carlos Street to 16th Street for safer vehicle highway access.

#### 4. Hazardous Waste/Site Contamination

- What documents are available regarding the real estate transfer of the property? Was some sort of detailed environmental clearance done and is it available to the public?
- The project site was formerly a Navy anti-aircraft training center. We request that soil sampling be conducted at the project site, in consultation with the community regarding what contaminants to test for and what locations to sample on the site.

#### 5. Sewer Problems

- There have been numerous sewage system overflows both from the Sewer Authority Mid-Coast sewage treatment plant and pipes, and locally within the Montara Water Sewer District. These repeated, significant sewage spills appear to result, at a minimum, from antiquated and failing pipes. The proposed project should be evaluated for its impact on this failing sewer system, and for the cumulative sewage impact of this proposed project in conjunction with past, present, and future projects. In addition, there should be an analysis of what monetary contributions will be necessary from MidPen to ensure that there are no additional sewage spills resulting from adding the proposed project to the already failing sewage system.



6. Parking

- With room for one or two cars in front of each house, increasing automobile density has the potential to generate a lot of conflict. I have seen cars at MidPen's Moonridge complex overflowing onto Miramontes Point Road. Moss Beach does not have a similar wide empty street that can absorb extra cars.

7. Drainage

- When will storm drainage be addressed? How big is the culvert that passes under Highway 1 for Montara Creek, and what is its capacity? What is the coverage (pavement and roofs) for the planned development, and how will this affect a 10-minute runoff in a 100-year storm event? Will the runoff be considered as a point source for NPDES purposes?

8. Pedestrian Traffic

- A safe crossing is needed at the lighthouse/16th Street for the southbound bus stop and for the Coastal Trail which crosses the highway there. A raised median refuge island, proposed in the Mobility Study, would enable two-stage crossing.
- If this housing project is to proceed, the Parallel Trail segment in this area must be prioritized and implemented, at a minimum between downtown Moss Beach and 14th Street.

9. Jobs (Source of Numbers)

- They stated that we have 1,400 local jobs in El Granada/Princeton, Moss Beach, and Montara but miss to provide the source information. Jan Lindenthal, MidPen's Vice President of Real Estate Development is quoted in the SM Journal "Still, with 1,300 low-income jobs on the midcoast." 1400 vs 1300 with no source information? Where are the jobs?

10. Water

- We request that the project be evaluated for the volume of water (gallons/day) needed for the proposed project, and that these estimates include realistic estimates of water for project residential units, project landscaping, and water for firefighting. Also, the impact of this increased water demand should be evaluated for its impact on water quality to residents in the proposed project and the surrounding Moss Beach community.

## 11. Population

- The MidPen housing proposal is for 71 units totaling 144 bedrooms. At maximum occupancy, there would be 359 residents, and this does not include guests or visitors to the community center. This development would increase the population of Moss Beach east of Highway 1, where this will be built, by 26%. This population increase will take place in one location all at once, as opposed to several decades of gradual development.

## 12. Public Transit

- This project highlights the urgent need for expanded Coastsides public transit and the funding that it requires. Quite simply, without convenient school and commuter bus service at this location on the highway corridor, this project cannot be justified.
- This site is near a SamTrans bus stop serving the #17 bus. Measures should be taken to ensure safe and convenient access and waiting areas for passengers. These measures should include crosswalks and appropriate pedestrian access to the bus stop. This bus operates on headways of approximately one hour. Measures to increase the level of service should be taken.
- Given the size of the project, it should include a robust Transportation Demand Management (TDM) Program to reduce VMT and greenhouse gas emissions. Such measures will be critical in order to facilitate efficient transportation access to and from the site and to reduce transportation impacts associated with the project.

### Applicable Regulations, Review, and Approvals Required:

As was discussed in the public notice for the workshop, this application will require an amendment to the County's Zoning Regulations, the LCP Land Use Plan Map, and Policies 3.15(b) and (d.1) of the LCP because the existing PUD zoning for this parcel calls for a much different, denser development. The Coastal Commission must approve this change to the County's LCP before the County can act upon a request for a Coastal Development Permit.

Once a formal application for this project is submitted to the County Planning Department, then the project will be scheduled for public hearings at the Planning Commission and Board of Supervisors. If the Board of Supervisors chooses to support the proposed LCP amendment, then the County will forward the proposed amendment request to the Coastal Commission for certification at a public hearing. The Coastal Commission is the final decision making body for any proposed LCP amendment and is responsible for compliance with the California Environmental Quality Act for this first phase.

Section 21080.5 of the California Environmental Quality Act (CEQA) exempts local governments from the requirement of preparing an environmental impact report (EIR) in connection with its local coastal program. Instead, the CEQA responsibilities are assigned to the Coastal Commission, and the Commission's LCP review and approval program have



been found by the California Resources Agency to be functionally equivalent to the EIR process. For this first phase of this project, the County will only submit the technical studies required to meet the Coastal Commission's LCP Amendment requirements.

Assuming that the Coastal Commission certifies the proposed amendments, then the applicant will be able to apply for a Coastal Development Permit to construct the project. Consideration of this Coastal Development Permit will follow the same path as any other CDP with referrals to the MidCoast Community Council and consideration at the Planning Commission. However, the project does not automatically go to the Board of Supervisors or the Coastal Commission unless appealed. The County will be responsible for addressing California Environmental Quality Act requirements in conjunction with its consideration of the CDP application.

If you have any questions regarding this summary, please contact me at 650/363-1849 or at [mschaller@smcgov.org](mailto:mschaller@smcgov.org).

Sincerely,



Michael Schaller  
Senior Planner

MJS:jlh – MJSBB0674\_WJN.DOCX

Attachment A: E-mailed Comments  
Attachment B: Notes from the PCRC Support Staff  
Attachment C: Government Agency Comments

cc: Board of Supervisors  
Planning Commission  
Workshop Attendees  
Other Interested Parties



**County of San Mateo - Planning and Building Department**

# **ATTACHMENT A**



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**From:** Ron <[REDACTED]>  
**Sent:** Monday, September 11, 2017 3:04 PM  
**To:** Mike Schaller; renee.ananda@coastal.ca.gov  
**Subject:** Housing Development in Moss Beach

This proposed 71 unit housing development in Moss Beach seems to me way out of scale for such a small neighborhood. I live near by in Montara and I'm not at all in favor of such a large construction. Why 71 units? To maximize the density (read developer profit)?

What happens to mitigate traffic during construction, much less after all the units are occupied? Yet another stoplight on HWY 1? What alternatives have been considered? If there are alternatives, are their descriptions available for public viewing.

Please come up with something on a more appropriate (i.e., smaller) scale.

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**From:** Dorothy <[REDACTED]>  
**Sent:** Wednesday, September 20, 2017 1:58 PM  
**To:** Mike Schaller  
**Subject:** MidPen Pre-App Meeting - Tonight! at 6pm

I am unable to attend tonight but would like to have some input.

Traffic is bad especially on good weather weekends. If each stop light could at least double the amount of lanes before the light and have them merge back after the light a lot of the congestion could be avoided. The light at Frenchman's Creek is terrible. It backs up traffic for at least 3 miles to Coral Reef Ave. If the weather is good the traffic backs up further.

I think there should be more work offered on the whole coastside, not just Half Moon Bay. Is there anyway to get more businesses to come to the coastside so people wouldn't need to commute over the hill?

Years ago I suggested a VERY circuitous route around Highway 1 so that if there is an accident on the road there is a way around it instead of just waiting for the accident to clear. Not just on one side of the road, it would need to cross the highway OFTEN so that no one would use it unless there is an accident or road closure. If you are interested in this and would like to know more please let me know.

The sewer overflowing is also a concern to me. Our infrastructure needs to be updated before anymore homes are built.

Dorothy Baughman [REDACTED]

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**From:** Chris Tyler <[REDACTED]>  
**Sent:** Wednesday, September 20, 2017 8:12 PM  
**To:** mvilchez@pereweb.org; Mike Schaller  
**Subject:** Community input re MidPen

Traffic analysis should include entire commute corridor beyond choke points on 92 and Pacifica.

I suspect most of us commute off the coastside for work.

I would dispute understanding of another speaker that some guarantee could be offered that a privately maintained street could be restricted. Cal subdivision act grants legal use of all subdivision streets to all homeowners by deed.

Chris Tyler

[REDACTED]  
Moss Beach, 94038

Mobile

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**From:** David Magnuson <[REDACTED]>  
**Sent:** Wednesday, September 20, 2017 10:33 AM  
**To:** Mike Schaller  
**Cc:** renee.ananda@coastal.ca.gov; MossBeach@midpen-housing.org  
**Subject:** mid-pen project @ Moss Beach

Follow up  
Completed

Mr Schaller,

I'm not particularly opposed to the affordable housing project on the hill above me, but I am curious. On behalf of full disclosure, I have a question. As a former Environmental Engineer and Master Planner for the Department of Defense (DoD), I would be interested to know more about the real estate transfer and any preliminary assessment that might have been done on the property.

What documents are available regarding the real estate transfer of the property? Was some sort of detailed environmental clearance done and is it available to the public? Since this property was zoned in 1986 for low-income housing, I assume it had already been turned over to the county. I have searched, but have not found, any documentation regarding the transfer from the federal government. Since 1986 preceded the passage of the "Federal Facilities Act" (H.R. 2194 — 102nd Congress Federal Facilities Compliance Act of 1991( [www.govtrack.us/congress/bills/102/hr2194](http://www.govtrack.us/congress/bills/102/hr2194) )), you may be aware that environmental practices on military bases prior to the passage of that bill were often conducted under the concept of sovereign immunity, without oversight by local and state authorities for compliance to environmental law. After the passage of the Federal Facilities Act (FFA), DoD and the Department of Transportation, with state and local input, became much more thorough in screening properties before releasing them, with at least a Preliminary Assessment performed by environmental professionals. Prior to FFA, property was sometimes released with a statement of finding by a real estate specialist that no record of contamination exists.

Maps of the facility that are available online show operations occurred there that might have required more clearance under the FFA than previously (fueling, incineration, garage, utilities). As a minimum, the operations at the facility would have been documented and made available for public comment. Was this done? Can it be elaborated on now in a public forum?

If this information has already been made available, as well it may, please excuse my ignorance. I have not been following this closely, but this is what kind of piqued my interest from the start because of my experience previously working at military bases in the bay area, southwest, northwest and overseas.

sincerely,  
David A Magnuson  
[REDACTED], Moss Beach



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**From:** Theresa McLaughlin <[REDACTED]>  
**Sent:** Thursday, September 21, 2017 6:50 PM  
**To:** Mike Schaller  
**Subject:** Proposed MidPen development in Moss Beach

Dear Mr. Schaller -

I live in El Granada and am building a home on Stetson Street in Moss Beach. I attended the planning meeting with MidPen yesterday evening and two of the previous workshops, and I would like to share my concerns about the proposal:

- 1) **Blind curve:** Over a year ago I expressed my concern to MidPen about safe access to the development from Highway 1. MidPen's preliminary traffic report states that there is no room for a deceleration lane for those making a right turn from Highway 1 onto Carlos. Drivers who yield to bicyclists/pedestrians or slow as southbound cars turn left will be at risk of being rear-ended. The traffic report indicates that it *might* be possible to cut the hillside back to improve visibility south, but feasibility and CalTrans funding for this are not established.
- 2) **Across from the sewer plant/no accessible trails:** Crossing Highway 1 at Carlos takes you to the sewer plant with no trails up or down the coast. You also reach the Point Montara lighthouse which has no space or public restrooms; access to the small beach is down a steep hill and limited to 1 hour to protect Fitzgerald Marine Reserve wildlife. In many parts of Half Moon Bay and El Granada you can cross Highway 1 and find yourself on a well maintained, paved trail that lets differently-abled people walk/run/bike/fish/have a picnic and enjoy the beautiful Pacific Ocean. In Moss Beach if we cross at Vermont or California we can get to the Fitzgerald Marine Reserve (where beach access is limited to 1 hour) and Airport St provides bicycle access to the Harbor in El Granada. Carlos Street is an exceptionally bad spot to pour development resources.
- 3) **Segregated feel of the complex:** MidPen is creating an economically segregated housing complex with different governance than the rest of Moss Beach. The city-within-a-city will have after school programs, exercise facilities, and a community meeting room - essentially creating a non-centrally located community center that excludes 75% of the Moss Beach population. Perhaps they will allow non-MidPen residents access to these facilities for a fee, but non-MidPen residents will be second class citizens, experiencing the problems of additional population without the benefits of amenities and services accessible to the entire town.
- 4) **Car traffic on narrow residential streets:** I am concerned that traffic from the new homes will divert to Carlos and Stetson Streets. Right now I see many of my neighbors out walking their dogs, riding bikes, or playing basketball. This won't be possible if 20% of the town starts driving down these narrow roads. Stetson and Carlos are also the natural routes for pedestrians from the new development to get to the market, post office, Moss Beach Park, library BookMobile, Latter Day Saints Church, and to cross highway 1 at California to get to the Fitzgerald Marine Reserve. Many non-MidPen pedestrians would take Carlos and Stetson to access the open space required as part of the development. Carlos and Stetson will become the most highly trafficked automobile, pedestrian and bicycle routes in Moss Beach, and the roads are not wide enough to accommodate these activities safely.
- 5) **Parking:** Many Moss Beach residents have no off-street parking or work trucks that don't fit in the garage/driveway. With room for one or two cars in front of each house, increasing automobile density has the potential to generate a lot of conflict. I have seen cars at MidPen's Moonridge complex overflowing onto Miramontes Point Road - Moss Beach does not have a similar wide empty street that can absorb extra cars.
- 6) **5 miles from the nearest supermarket.** Most residents in Moss Beach will need cars because the location is distant from transit hubs and commerce centers. The bus comes once an hour and stops running at 8 in the evening.
- 7) **Three planned developments, no urban planning:** In addition to MidPen, Seton Hospital has proposed development on their site across from the planned Big Wave project. We have three large developments on the north and south ends of Moss Beach that seem to be happening in parallel isolation.

Thank you for your time at the workshop yesterday. I was surprised by the Conflict Mediator format - maybe they should just call it Meeting Facilitation? Posting an agenda in advance might help calibrate people's expectations. Also, I had trouble finding the room where the meeting was being held - some signs outside would be helpful if other meetings are held at the school. I agree that microphones would help, too, just adding it here in case my vote helps you make a case for it next time.

Thank you again and best regards,



**JQ Oeswein Statement Regarding the Environmental History of Farallon Heights:**

Good evening. My name is JQ Oeswein. I am a resident of Moss Beach and a leading member of the Resist Density Organization.

The site of this proposed development, historically known as Farallon Heights, was formerly part of the U.S. Navy Point Montara Anti-Aircraft Training Center during WWII. The types of military activities conducted on the site made use of many supplies and materials such as fuels, oils, tar, cleaning fluids, solvents, brake fluid, antifreeze, pesticides and building materials – many of which are known today to produce environmental toxins. In addition, there was at least one underground fuel tank, one or more power transformers and an incinerator, which can also produce toxic contamination. The Navy's standard operating procedure at the time would have been to dump, bury or burn waste and refuse, which often included the above supplies and materials. Available records suggest that no assessment for or cleanup of toxins was done by the military either before or after they abandoned the facility in 1946.

Additionally, asbestos, used for construction of the Navy buildings and for construction of the elementary school built on the site in 1949, is still clearly visible and abundant today. Unfortunately, the site has also been used on many occasions as an illegal dump for unwanted furniture, appliances, clothes, oil, diesel fuel and other items, increasing the possibility of additional contamination.

An EIR submitted in 1985 as part of a previous development proposal did not address any of this potential contamination. From the presentation MidPen made to the SF Coastal Commission Staff in August, it appears that MidPen is considering a tiered environmental impact assessment or negative declaration based on the 1985 EIR.

Our knowledge and regulation of environmental issues have advanced significantly since 1985. We know now that any activities that disrupt the soils on the Farallon Heights site will likely create exposure pathways to residual contaminants if present. Exposure may lead to release of toxins into the air and cause run-off of toxins into the adjacent Montara Creek, a

source of drinking water for the Montara/Moss Beach community. Such activity would risk pollution of the community's air and water, as well as that of the adjacent federally protected Fitzgerald Marine Reserve.

Therefore, prior to any development of Farallon Heights, a new and thorough environmental assessment should be done which takes into account the above-mentioned risks for contamination. Since this land was a formerly used defense (FUD) site, evaluation of the land and assessment of potential toxins based on military records and usage, as well as recommendation for remedial actions, should be overseen by the California Department of Toxic Substances Control.



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**From:** David Magnuson <[REDACTED]>  
**Sent:** Thursday, September 21, 2017 9:59 PM  
**To:** Mike Schaller  
**Subject:** MidPen Moss Beach, comment & questions

#### Additional comment on Traffic Impact Study

- The *Highway 1 Safety and Mobility Study* is discussed on pages 2 through 4 of the Kittleson & Associates' *Cyprus Point Preliminary Traffic Assessment*. The *Highway 1 Safety and Mobility Study* states in part (Page 3, paragraphs 3 and 4):

2010 Caltrans data indicate that the average daily traffic volume on the highway is 13,900 vehicles south of the intersection with Vallemar/Etheldore Streets in Moss Beach, and 15,000 north of the intersection. During the month of heaviest recorded traffic flow, the volume increases by 600. Posted speed limits vary from 45 mph heading south from Devils Slide through Montara, to 50 mph south of Montara through Moss Beach, to 55 mph south of Moss Beach past Half Moon Bay Airport.

At the northern end of the study area a new tunnel and bridges bypass the portion of the Highway 1 roadway at Devils Slide that has been subject to landslides are expected to open in 2012...

The *Highway 1 Safety and Mobility Study* goes on to mention the possibility of a big wave project but makes no mention of the MidPen project that is the subject of the *Cyprus Point Preliminary Traffic Assessment*.

Based on the above statements, I want to point out that the *Highway 1 Safety and Mobility Study* was based on Caltrans data from before the opening of the tunnel. This data is 7 years old. Coastside residents frequently speak of the increase of traffic since the opening of the tunnel. Also, the MidPen project was not considered in the study at the time of its adoption (2012).

The *Highway 1 Safety and Mobility Study* is a planning document does not represent anything that is budgeted or in design for the specific area of the Carlos and 16th Street intersections with Highway 1.

In conclusion, the crossings as presented in the *Cyprus Point Preliminary Traffic Assessment* do not sufficiently represent the traffic impact of the MidPen project. Nor can either be presented as a future condition that mitigates the impact of the pedestrian and vehicle traffic.

#### Additional questions:

- I am assuming that the *Cyprus Point Preliminary Traffic Assessment* does not meet, and was not intended to meet, the requirements of a Traffic Impact Study for San Mateo county. As a preliminary study, its utility as a planning document is to be used to make a determination if a Traffic Impact Study will be needed, and perhaps to address the concerns of the community. Is this correct? At what point will a determination as to the requirement for a full TIS be made, and will there be public input into that decision?

- *Traffic Impact Study Requirements*, County of San Mateo, 9/1/13, states in part (Section IV [TIS Report Contents](#), Paragraph C [Analysis Methodology and Software Requirements](#), subparagraph 1)) states in part:



**Trip Generation-** Tabulate the estimated number of daily trips and AM and PM peak-hour trips generated by the proposed project entering and exiting the site. Trip generation factors and source are to be included in the report. *The trip generation rates contained in the latest edition of the Institute of Transportation Engineers (ITE) Trip Generation Manual should generally be used.* (italics mine)

Was the ITE *Trip Generation Manual* used to generate the trips for the *Cyprus Point Preliminary Traffic Assessment*? If so, could you share a breakdown for me of the methodology and parameters, including the ITE Zoning Code used? Actual sections of the text and tables would be nice. If assumptions were made, like school bus service to the facility, carpooling, transit, please let us know.

2010 Caltrans data indicate that the average daily traffic volume on the highway is 13,900 vehicles south of the intersection with Vallemar/Etheldore Streets in Moss Beach, and 15,000 north of the intersection. During the month of heaviest recorded traffic flow, the volume increases by 600. Posted speed limits vary from 45 mph heading south from Devils Slide through Montara, to 50 mph south of Montara through Moss Beach, to 55 mph south of Moss Beach past Half Moon Bay Airport. At the northern end of the study area a new tunnel and bridges bypass the portion of the Highway 1 roadway at Devils Slide that has been subject to landslides are expected to open in 2012.

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**From:** Theresa McLaughlin <[REDACTED]>  
**Sent:** Friday, September 22, 2017 9:04 AM  
**To:** Mike Schaller  
**Subject:** Re: Proposed MidPen development in Moss Beach

Good morning. This is outside the scope of the feedback request, but I thought I would describe where I think higher density development would make more sense on the coastside:

1) South of Miramar and east of Highway 1: The highway is further from the shore allowing safe bicycle paths and possibly widening the highway to two lanes. There is a large ribbon of accessible beach that does not get as crowded on the weekends. Taller buildings could be placed closer to the foothills, providing a view for residents and preserving the views of existing homes and visitors.

2) Close to Rt 92 and walking distance to downtown Half Moon Bay. People could function without a personal vehicle, but include parking decks anyway (again, closer to the foothills) to expand available Park and Ride spaces. (This would also give apartments built above the deck a better view.) Give tourists the option to park (free?) close to 92 so that they do not have to sit through so many lights. It won't work for everyone but it will take some stress off Main Street.

3) Taller apartment buildings between organic farm fields and the foothills, again south of Miramar and as close to HMB as possible. The pairing of higher density housing and organic agriculture is popular. There are homes in Livermore around vineyards, for example.

People are still very concerned about traffic, but it will also be easier to widen Hwy 1 to two lanes south of Miramar/El Granada, which will help manage the growing population. (At Surfer's Beach in El Granada and just north of Carlos St in Moss Beach Hwy 1 experienced erosion over the winter that took out the shoulder on the southbound side. We are worried about maintaining 1 lane in each direction north of El Granada.)

I know Half Moon Bay is proposing a development near the high school. This makes intuitive sense to me, both for current and future residents. I hope San Mateo County can find other opportunities to encourage Smart Growth like that on the coastside.

Sincerely,  
Theresa



On Thu, Sep 21, 2017 at 6:50 PM, Theresa McLaughlin <[REDACTED]> wrote:  
Dear Mr. Schaller -

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**6) 5 miles from the nearest supermarket.** Most residents in Moss Beach will need cars because the location is distant from transit hubs and commerce centers. The bus comes once an hour and stops running at 8 in the evening.

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Thank you again and best regards,  
Theresa



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**From:** Amy Paulson <[REDACTED]>  
**Sent:** Friday, September 22, 2017 4:33 PM  
**To:** Mike Schaller  
**Subject:** MidPen Pre-Application Meeting in El Granada

Follow up  
Completed

Dear Mr. Schaller,

Thank you for hosting the pre-application workshop for MidPen's proposed development in Moss Beach. I wasn't comfortable sharing my comments in that forum so I am writing to share my concerns about the Cypress Point MidPen development proposed for Moss Beach.

I am an eight year resident of Moss Beach Heights along with my spouse and 3 children. I first learned about MidPen's proposed development in 2/2016 and have remained engaged in the process, attending all of the public events and reading all of the information presented.

Here are my concerns:

1. It seems unacceptable that there is still no answer to ingress and egress into the development. How are people going to enter and exit the development? It is a simple question that hasn't been answered and with the suggestion of making Carlos a one-way in sections raises further logistical and safety questions. How can the community engage in a real conversation about this development and offer solutions or suggestions without knowing how future residents will enter and leave the community? The MidPen representative said he hoped the community would offer solutions at that workshop. I believe an expert should look at this issue, review the streets in the adjacent neighborhood, intersection to HWY 1 and propose viable solutions. Each of the solutions offered are flawed and nothing should move forward on this development until this basic question is answered and a plan is developed.
2. I am assuming that the question about ingress/egress is being kicked down the road because the real plan is just to not do anything substantial and filter all of the traffic from this proposed development through the adjacent neighborhood. Who is responsible for improving the infrastructure for this neighborhood when that happens? Most of the houses in the neighborhood were built in the 70's. Most of the roads in this neighborhood have sections that are narrow, one lane in sections, lack cross walks, sidewalks, and most intersections don't have simple traffic control mechanisms like stop signs. Frankly, with 3 young children, I have many safety concerns with the neighborhood roads now and adding 100's of additional cars will only compound those issues. Daily I see people flying through the numerous intersections that have no stop signs and narrowly avoid collision. Who is responsible for these safety concerns?
3. I also wanted to comment on the number of parking spots provided for the proposed Cypress Point development. The PUD requires 2 spots/unit. The proposed development as presented includes 2.26 spots/unit.

The developer's Moonridge property is similarly situated to this development in that they are off HWY 1, removed from most community-oriented services, and aren't located near a transportation corridor. The MidPen website states the parking ratio is 1.8 at MoonRidge. In an email from MidPen's General Manager of Operations and Leasing to another community member, they wrote the following in reference to parking:

*"The simple truth is that when Moonridge was built 20 years ago the parking ratio was different and community was "under-parked" with large units at this community and only 1 parking space per unit assigned/available to the residents to park their car. Most households in the area have 2 cars per household... It's a problem we recognize and yet the street in front of the community is a public street and our residents are certainly permitted to park on it."*

I have copied the original email below my message. It was a long email string, so I highlighted the only portion that I am referencing and concerned with.

It seems to me that if 1 parking space per unit left MoonRidge "under-parked", 2.26 spots per unit is narrowly meeting the demand for parking. Residents of this development will host guests, have teenagers that have cars, and could own recreational or commercial vehicles, so most units will likely need more than 2.26 spots. The future residents of this proposed development will have a large dependency on single occupancy vehicles since it is far from job centers, very little public transport, no safe options for bikes or pedestrians, and a high VMT to community-oriented services. MidPen's plan needs to be adjusted to accommodate a more realistic projection of demand for parking spaces.



I would also question whether the developer feels that an acceptable solution for parking at Cypress Point is to overflow into the streets adjacent to the property as they state above is a common practice and acceptable solution for the MoonRidge development. Given the semi-rural nature of Moss Beach Heights the roads adjacent to the development lack curbs, are narrow, no sidewalks, and can't safely handle overflow parking.

4. Finally, I would like to comment on the meeting itself. I was extremely uncomfortable in this meeting. It was disorganized, chaotic and uncontrolled at best. While I don't condone all the actions of all of the community members present at this meeting, I believe a large reason for the community's reaction was the lack of transparency. The fact that there would be a third party moderator, the agenda, and the format itself should have been announced prior to the meeting. It was concerning that there was no formal opportunity to make public comments (yes, some people jumped up to make comments but the opportunity should have been formally given to all people in the room) and it was a waste of time for me to listen to people ask questions, then re-phrase the question for note-takers, that weren't directly addressed during the meeting. Also, I have heard from fellow community members that see hosting the meeting in El Granada instead of Moss Beach or Montara as a way to reduce the number of participants. I don't mean to be negative but only want to provide constructive feedback as a community member who came to this meeting with an open mind.

If you would like to discuss the contents of my email, please reach out at the email or phone below.

Thank you for your time.

Amy Paulson




----- Forwarded message -----

I sent this email and I am awaiting a response from Mid Pen. I thought this might be of interest.

Sent from my iPhone

Begin forwarded message:

**From:** dennis.shapses@  
**Date:** October 22, 2016 at 9:57:13 PM PDT  
**To:** Felix AuYeung <fauyeung@midpen-housing.org>  
**Cc:** Kimberly Wolcott <kwolcott@midpen-housing.org>  
**Subject:** Re: Moss Beach - Third Community Open House

Thank you for the update. The statement about the cars on the street was my assumption. The officers were very clear that this subletting is going on, why would they invent this fact? In addition, how could your organization possibly know who's living in the unit illegally. Prior to your visits the sub tenants would be conveniently gone, unless you do surprise visits (which I presume would be intrusive if not illegal)

The ambulance discussion was of major concern as the officers statement about ambulances coming and going thru the night reminded me of my previous conversation with a hospital administrator. Are you alerted when ambulances go in and out at night?

Why the need for a Sheriff sub station, is there a concern about gang activity?

Thank you again for your response

Sent from my iPhone

On Oct 21, 2016, at 5:58 PM, Felix AuYeung <fauyeung@midpen-housing.org> wrote:

Hi Dennis,

Please see Kim's response below. Thanks,

Felix

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**From:** Kimberly Wolcott  
**Sent:** Friday, October 21, 2016 5:39 PM  
**To:** Felix AuYeung; Debra Sobeck  
**Cc:** Andrew Bielak  
**Subject:** RE: Moss Beach - Third Community Open House

Hi Dennis,

I apologize for the delayed response as I was out of the office.

In response to your questions, I am also surprised to hear there were officers stating we do not enforce our rules. We work very closely with the Sheriff's Department, in fact they have a substation at our site. In our regular communication with members of the Sheriff's Department we have heard just the opposite of what you have stated in your email. In our communication with the Sheriff's Department we have routinely asked the Sheriff's Department's to alert us if they are seeing any unusual and/or recurring issues at the community. To date, we've had no notifications from the Sheriff's Department that there are problems which we should be addressing. Additionally, whenever we think we see a problem, we immediately contact them and address our concern. Point in fact, a few months ago, we had an isolated incident of graffiti on our site, the first we had experienced in years and we immediately called the Sheriff's Department, took pictures, sent it to their Graffiti Task Force, requested additional patrols, etc... Whenever we see an issue, we take pro-active action to immediately address the issue and resolve it. We've had no further incident.

The Sheriff's Department has built a strong relationship with the residents at Moonridge over recent years which has resulted in increased collaboration and communication between the community and Sheriff's Department which I think we all feel has had a very positive impact on the community. MidPen has partnered with the Sheriff's Department and they hold a Citizen's Academy and a



youth and teen program at the community. In fact, one of the youth at our community was just admitted to the Sheriff Department's Officer's academy, a source of great pride within the community.

As for folks sub-leasing their units we have policies and practices in place to monitor this, every year our residents are required to re-certify and update all household information, in addition we conduct semi-annual unit inspections and have several agency inspections throughout the year. This is something if found we immediately address as it is a violation of the lease. I realize there may be a misconception regarding the number of cars surrounding the community and why people might believe this is due to the residents having unauthorized occupants. However, the simple truth is that when Moonridge was built 20 years ago the parking ratio was different and community was "under-parked" with large units (2,3, and 4 bedroom units) at this community and only 1 parking space per unit assigned/available to the residents to park their car. Most households in the area have 2 cars per household and the residents at Moonridge are no different with most of our families having two working heads of households. It's a problem we recognize and yet the street in front of the community is a public street and our residents are certainly permitted to park on it.

In regards to the ambulance issue you referenced, I have not heard anything like this in the entire time I have been working at Moonridge/MidPen. In fact I asked around and no one I spoke to has ever heard of this issue. We have two on-site management representatives who live in this community and would most assuredly be familiar with ambulances coming on and off the site with any frequency and when queried they were not familiar with this type of circumstance. And quite frankly, if I believed that the hospital were indeed turning away the Moonridge residents I think we would have a bigger issue on our hands and I would be conducting considerable research into that matter. Can you tell me where you this information came from?

Please let me know if you have additional questions or would like to meet and discuss your concerns further as I would be happy to meet with you and address any additional concerns you may have.

Thanks,

Kim Wolcott, General Manager of Operations and Leasing

MidPen Property Management

303 Vintage Park Drive Suite 250

Foster City, CA. 94404

t.(650) 356-2916 c. (650) -242-2135 f.(650) 357-9766

kwolcott@midpen-housing.org


www.midpen-housing.org

<image003.jpg>

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**From:** Felix AuYeung  
**Sent:** Monday, October 17, 2016 1:28 PM  
**To:** Kimberly Wolcott; Debra Sobeck  
**Cc:** Andrew Bielak  
**Subject:** FW: Moss Beach - Third Community Open House  
**Importance:** High

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**From:** dennis.shapses@  
**Sent:** Monday, October 17, 2016 1:24 PM  
**To:** Felix AuYeung  
**Subject:** Re: Moss Beach - Third Community Open House

Felix,

I left a message on your voicemail. New concern local officers told me that MoonRidge is not well managed as multiple families are living in one apartment. The description is that they rent out rooms to family members (it's like winning the lottery) and that's why there are so many cars. Management does not enforce the rules. In addition ambulances run in and out of the place. As discussed before the local hospital is directing ambulances from MoonRidge away from the hospital. Your company may build good low cost housing units but it sounds as if you do not enforce the covenants. I was surprised at their response . Have you addressed these issues at the community meetings  
Sent from my iPhone



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**From:** Harald <[REDACTED]>  
**Sent:** Tuesday, September 26, 2017 3:37 PM  
**To:** Mike Schaller  
**Cc:** renee.ananda@coastal.ca.gov; Dave Pine; Carole Groom; Don Horsley; Warren Slocum; David Canepa  
**Subject:** Concerns - MidPen Housing Development in Moss Beach

Dear Mr Schaller,

I'm a resident of Moss Beach and want to share a couple of concerns. The following statements and comments express my own opinion but summarize concerns that were / are raised by many community members:

### **1. MidPen Pre App workshop and approach**

The workshop became hostile after the audience realized that we will have table discussions instead of a public forum. This came across as a "trick" to contain and limit information sharing across the audience. The third party facilitator missed to read the audience, insisted on her process and we lost 20 plus minutes debating the approach. In addition, the meeting started late.

MidPen's slides lacked clarity (how can they miss to note the community center), did not address issues that were raised since day one, contained wrong/ misleading information and lacked source information. For instance - preference for locals: this violates existing laws but MidPen continues to make that point. They stated that we have 1400 local jobs in El Granada / Princeton, MB, and Montara but miss to provide the source info. Jan Lindenthal, MidPen's vice president of real estate development is quoted in the SM Journal "Still, with 1,300 low-income jobs on the midcoast." 1400 vs 1300 with no source information? Where are the jobs? There is a low level of confidence in the quality of the minutes that will come out of the Pre App meeting as the note takers on the flip charts seemed to struggle to keep up with the discussion. Why was the workshop not recorded and why did the county not publish the date and time of the workshop to the impacted neighborhoods? The MCC published the date and time. MidPen published workshop minutes in the past but they were summarized and missed many critical points that were made by the community and have not been addressed in the recent proposal.

MidPen tried to sell "pluses" where they "gave in" based on community input but it turned out that they are required by law to offer for instance a certain number of parking spots per unit or meet certain LCP requirements. MidPen did not share a timeline with the community but I understand that they did in a session with the CCC and County staff. Why is that? They claim to work with the impacted community and make it a transparent process.

### **2. KAI traffic impact assessment study from June 2017**

The study downplays the impact and states that the project will not significantly impact the adjacent Highway 1/ Carlos Street intersection and has "sufficient operational capacity."

How can an additional couple of hundred daily car trips plus visitors to the community center have no impact? There is no walk-ability. How will an additional pedestrian crossing to Point Montara plus a couple of hundred cars accessing Highway 1 at a dangerous blind curve impact traffic flow on Highway 1?

#### Calculation of increase in traffic volume

The KAI traffic assessment report states "The project is expected to add 37 trips during a typical weekday AM peak hour, 45 trips during a typical weekday PM peak hour..."

How does the math work? Why doesn't the report provide the underlying assumptions?



We are looking at 71 units with an average of 1-3 cars per unit translating to approx 100-200 cars plus x daily visitors to the new community center. 100-200 cars times 3-4 trips per day translate to approx. 300 – 800 daily car trips in and out of the development plus x daily visitors to the community center. Now add 1500 daily car trips in and out of the Big Wave development and we have the perfect gridlock between El Granada and Montara. Plus an estimated 2 Mio annual visitors to the Coastsides...

#### Blind Curve – risk of significant increase of car accidents

Signalization of the Highway 1 / Carlos intersection, or roundabout and a pedestrian crossing in close proximity will most likely result in a significant increase of accidents. Drivers from the South do not have visibility beyond the curve and stopped traffic or a pedestrian crossing on Highway 1 will add to the accident risk. A reduction of speed will most likely be ignored by many residents and visitors to the Coastsides.

#### Cumulative effects

The KAI traffic study is looking only at the MidPen development and ignores surrounding measures that are planned by the County. Moss Beach is one of the access choke points for Big Wave and current plans show 2 additional traffic lights (Connect the Coastsides) in Moss Beach:

- Highway 1 / Cypress Ave intersection to channel a subset of 1500 daily car trips in and out of the Big Wave development
- Highway 1 / California intersection
- Plus whatever the decision is for the Highway 1 / Carlos intersection

How will the traffic flow on Highway 1 be impacted with all the additional signals (maybe one turns into a roundabout), increased traffic volume resulting out of the MidPen and Big Wave developments (ignoring the 2 new Hotels in Montara for now) and an estimated 2 Mio annual visitors to the Coastsides?

#### Creation of Parallel Roads

What is the impact on neighborhood streets and Farallone View Elementary School (many kids walk and bike to school and many roads do not have sidewalks) in Montara and Moss Beach as commuters and tourists try to bypass the gridlock on Highway 1 that will be created by the additional traffic measures and the MidPen and Big Wave developments?

The KAI study references outdated and incomplete traffic / transportation studies i.e. Connect the Coastsides that do not reflect current Coastsides traffic realities.

The outlined solutions do not address the concerns and will significantly increase the risk for accidents.

### **3. Failing Infrastructure: Sanitary Sewer Overflows (SSOs)**

Resist Density just released information about an environmental disaster on the Coastsides - a total of 101 sewage overflows (20 Category 1!!!) were recorded from Half Moon Bay to Montara from 2011 to mid 2017, according to public records. These findings raise significant questions as to whether the infrastructure can accommodate any more large development. The overflows are not isolated to specific locations and seem to indicate a systemic issue with the underlying infrastructure and capacity of the sewage systems.

How did a large brewery (as part of Big Wave and declared as “minor modification” instead of an office building) get approved knowing that large and problematic amounts of waste water are a byproduct of beer brewing? Does the underlying and failing infrastructure need to get fixed to stay in compliance with existing environmental laws before large developments can be added to the system?

### **4. Site Contamination**

Detailed maps of the facility and military usage are available. The types of military activities conducted on the site made use of many supplies and materials such as fuels, oils, tar, cleaning fluids, solvents, brake fluid, antifreeze, pesticides and building materials – many of which are known today to produce environmental toxins. In addition, there was at least one underground fuel tank, one or more power transformers and an incinerator. Burning waste in an incinerator is now known to produce toxins. The Navy’s standard operating procedure at

the time would have been to dump, bury or burn waste and refuse, which included the above supplies and materials. Extensive research did not reveal any records that the site has been cleaned up. I have 2 children and I'm very concerned about the potential release of toxins in the air and / or our drinking water as part of the housing development.

#### **5. Safety and Disaster Preparedness**

Accessibility for medical emergencies and first responders is already constrained and will be further reduced by large- scale developments without making adjustments to the existing infrastructure. Evacuation routes in case of major disasters (i.e. Earthquake, Tsunami, Fire) won't be accessible for Coastside residents and would strand the whole community and tourists. Many weekends are already a traffic nightmare for the Coastside.

Recent data (provided by a Fireboard member) show that we had 951 medical aid responses and 82 traffic accidents between January and July 2017. This data reflects 7 months of 2017 only and indicate a very concerning trend. What are the plans to ensure safety, accessibility and disaster preparedness for the Coastside? Or is that up to the community to figure it out after another large scale development is approved without the supporting infrastructure in place?

Thank you for your consideration.

Sincerely,

Harald Herrmann, Moss Beach



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**From:** Theresa McLaughlin <[REDACTED]>  
**Sent:** Friday, October 27, 2017 11:54 AM  
**To:** Mike Schaller  
**Subject:** clarifying concerns about accessibility at proposed MidPen site in Moss Beach

Hello, Mr. Schaller. I want to add to a point I tried to make in an email I sent to you on Sept 22 regarding the proposed MidPen development in Moss Beach. There is a social justice concern associated with locating affordable housing far from areas where the state will make investments in amenities like bicycle paths, public transportation and libraries and to preserve public access to coastal areas as sea levels rise. I frequently see residents pushing strollers or riding mobility scooters on the shoulder of Hwy 1 just north of the intersection with Hwy 92, and I can't wait for them to have a proper paved trail. This important trail in Half Moon Bay proper has been years in the making, and it is unlikely that similar trails will be funded in Moss Beach. Safe pedestrian/bicycle trails are not frivolous amenities - they facilitate healthy lifestyles.

Crossing Highway 1 at Carlos St in Moss Beach takes you to the sewer plant with no trails up or down the coast and *no potential for coastal trails because the bluff has already eroded to the private property lines*. You also reach the Point Montara lighthouse which has no space or public restrooms; access to the small beach is down a steep hill and limited to 1 hour.

- One mile north of Carlos is Montara State Beach, which due to the steep cliffs has no facilities accessible to the disabled. There are no trails - it is one mile of traveling on the shoulder of Hwy 1.
- One mile south of Carlos is the Fitzgerald Marine Reserve where beach access is limited to 1 hour, beach activities are limited to protect wildlife, and the steep cliffs limit access for the disabled. The FMR is beautiful, but for traditional beach activities many Cypress Point residents will need to drive south.
- Three miles south, in El Granada and Half Moon Bay you can cross Highway 1 and find yourself on a well maintained, paved trail that lets differently-abled people walk/run/bike/have a picnic and enjoy the beautiful Pacific Ocean.
- South of Miramar/El Granada short stairways take you to a five mile ribbon of sandy beach that supports a wide range of activities including fishing, swimming, walking, etc.

Last winter the southbound shoulder of Hwy 1 was damaged by erosion at Surfer's Beach in El Granada and just north of Carlos Street in Montara, forcing bicycles into the travel lanes of Hwy 1. Between El Granada and Pacifica there are many areas where there is no shoulder, no bicycle paths, no room to build them, and no room to add lanes to Hwy 1.

Please try crossing Hwy 1 at Carlos Street and walking up and down the coast. Imagine yourself in a mobility scooter or wheelchair at Carlos and Sierra heading to the post office or just going outside for some exercise. Then try the same at Coronado St in El Granada. The pedestrian/bicycle trail in El Granada is vastly superior and well-used by all. Affordable housing residents should have access to these types of government-funded improvements.

Sincerely,

Theresa

Theresa McLaughlin  
[REDACTED]



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**From:** Theresa McLaughlin <[REDACTED]>  
**Sent:** Saturday, October 28, 2017 12:16 AM  
**To:** Mike Schaller; Don Horsley  
**Subject:** Affordable housing should include options for residents to build equity

Buying a home in the Bay Area is very difficult. Condominiums used to be an affordable option, but now homebuyers must compete with investors who can pay cash then rent the unit out. Building more affordable rental housing is a partial solution, but the equity generated by rent payments remains in the hands of the developer/management company. An affordable complex where residents can purchase or rent-to-own all or part of the value of their unit would provide the chance for residents to build some equity. I was surprised to see that MidPen participates in a Stewardship program called Hello Housing that provides long term management of below market, owner-occupied housing. Similar to rent-controlled units, there is a limit on the purchase price when the unit is sold, and the new buyer must also meet the affordable residence requirements.

Rent-to-own may not work for everyone, but I believe we should make at least a portion of affordable housing complexes rent-to-own or owner occupied.

Best regards,  
Theresa

Theresa McLaughlin  
[REDACTED]

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**From:** David Magnuson <[REDACTED]>  
**Sent:** Thursday, September 21, 2017 10:48 AM  
**To:** Mike Schaller  
**Subject:** MidPen moss beach project

Mr Schaller,

I attended the meeting last night. Thank you for coming out here. I don't feel that your intended purpose was accomplished at that meeting. I prefer meetings where written comments and questions are solicited ahead of time and discussed at the meeting. I think public brainstorming in this forum is going to make too much thunder.

The county planners normally send out notices ahead of time to the affected community explaining what the meeting is about. The notice that I received was from the Resist Density group, and it did not explain who was conducting the meeting or why. You are listed as a Senior Planner, so I am at a loss to figure why this meeting wasn't announced through San Mateo County as a planning meeting. In future, if you would like to build an email database to contact involving meetings for this project, please include my email address. Thank you.

It's desirable to place lower income housing in a higher income area for many reasons. In the past, counties were required to meet affordable housing requirements in order to qualify for some federal matching funds. My sense is that, consequently, the county would hope that mid-pen could make this work. That said, it doesn't look to me like either the county or mid-pen is conforming to good risk management practices in presenting the case to a highly concerned community, severely eroding trust.

When the A/E stated that the number of parking spaces as 'more than adequate' at 2.2 spaces per unit, without breaking it down by bedrooms, guest parking, whether any 'affordable housing' dispensations for compact cars, etc, like the San Mateo zoning code (Dec 2012) does (Section 6117), he gave me the impression of patronizing the audience. He was quickly countermanded by an audience member for 'just meeting the requirements'. As A/E's face perception of being 'hired guns' in meetings like this, he should be more careful. Also, it appears that most of the parking is detached, is that to code? BTW, is there a section 6305 to the aforementioned zoning code? It may be that MidPen is used to dealing with less informed, less affluent communities that are seeking more affordable housing. This community is able to attract multi-million dollar housing to contribute to its tax base and QOL. MidPen should be able to compete with well-funded developers for the community to welcome them to this desirable property, and not rely too much that its charitable connections will cause sharp-eyed neighbors to overlook anything.

Overall, the presentation left me with the vague feeling that maybe MidPen doesn't have the resources to develop this, sort of demanding, site. A good cause is one thing, but the safety and impacts to the community have to be adequately addressed. If there are to be further attempts to address them, this should be laid out clearly. Even the process is unclear at this point. Will MidPen commit or not? I might suggest a working group meeting monthly eventually, with members of the Resist Density coalition included with other residents and the affordable housing community, each reporting to its constituents. How about a schedule? Everybody's got one, they're like opinions. Not all are realistic. At this rate, I'd say that a 15 year time line, like BigWave, is sanguine.

Here are some questions:



General Comment - At each meeting, the stage the project is at should be clearly explained, as well as what comes next, what submittals are expected, and what public comment opportunities there will be. The Traffic Study and Concept Plan are very preliminary, and that should be emphasized. MidPen's traffic study did not offer up much detail on how trip times were calculated, what assumptions were used, traffic flow patterns, etc. Never should anything be sugar-coated or glossed over. MidPen needs to be proactive and acknowledge up front that it will be expensive to develop this site safely.

- Please ask MidPen to include a list of assumptions and a glossary of studies to the traffic report, like the *California Manual on Uniform Traffic Control Devices (MUTC)* and, particularly, San Mateo County's 2015 *Preliminary Congestion Study for the Highway 1 Congestion and Safety Improvement Project*. An URL where it might be available to the public, if available, would be useful. Also, the footnotes should be included, for example, who publishes, *2000 Highway Capacity Manual* (footnote 5). They'd lose big points on the PE test if they used a citation without referencing the source :) Traffic engineering used to be a pretty fluid applied science, with various handbooks and practices adopted in different areas, and citations are important.

- What is the meaning of changing the zoning from PUD to PUD-Affordable? Why would we do this and what is the effect on the constraints on the property? Can you explain the zoning code 6190 to us and 6182?

- As a non-profit operating the affordable housing complex, would MidPen pay the same property tax assessments as its neighbors?

- When will storm drainage be addressed? How big is the culvert that passes under highway 1 for Montara Creek, and what is its capacity? What is the coverage (pavement and roofs) for the planned development, and how will this affect 10 minute runoff in a 100 year storm event? Will the runoff be considered as a point source for NPPDES purposes?

- I would probably question their assumptions about trips generated by this project if they were stated, as well as sampling times, and the unaddressed effects of future traffic loadings generated by other signals and down road effects on local traffic turning onto the highway. I believe it would have served the project better if this report had been marked 'Draft' and at least a 60 day review period (30 day internal and 30 day public) were instigated. Sorry if I missed anything like that.

- Additional pedestrian traffic should also be addressed. Occupants and their kids will be crossing Highway 1 to access the beach at the light house. A/Es have limited time to spend onsite. Also, future traffic must be considered. The BigWave project does affect traffic patterns since people will leave that site out of sequence with the traffic light at Princeton. As one who is here and crosses the highway as a pedestrian at both 16th and Vallemar, I believe that traffic warrants that the report should have shown an option to make Carlos street 2-lane to the entrance of the project and install a traffic signal with pedestrian lane and 2 left turn lanes (one to Carlos, one to 16th), with appropriate widening of the road and signage. The county should consider pushing 16th through to Vallemar to reduce the very awkward situations that arise when cars are waiting opposite each other to turn onto Highway 1 from Vallemar and Eseldore, which will be aggravated by traffic and pedestrians from this project.

- Off topic: The MCC does a great job with its website. I heard once its members are unpaid and that this is an advisory board, and its decisions are not binding. Is this true?

David Magnuson  
[REDACTED]





Date: September 26, 2017

To: Michael Schaller, Senior Planner, San Mateo County Planning & Building Dept.

From: Resist Density

Re: Pre-Application Meeting for proposed MidPen Housing Cypress Point, Moss Beach  
PRE2017-00032, APN 037-022-070

Via Email

Dear Mike,

Thank you for hosting the pre-application meeting for MidPen Housing's proposed Cypress Point project. Attached is a list of Resist Density's concerns for the record. In addition, we would like to submit the following questions to MidPen, and add these to the record.

- 1) The project site was formerly a Naval anti-aircraft training center. We request that soil sampling be conducted at the project site - in consultation with the community regarding what contaminants to test for and what locations to sample on the site.
- 2) We request that the project be evaluated for the volume of water (gallons/day) needed for the proposed project, and that these estimates include realistic estimates of water for project residential units, project landscaping, and water for fire fighting. Also, the impact of this increased water demand should be evaluated for its impact on water quality to residents in the proposed project and the surrounding Moss Beach community.
- 3) There have been numerous sewage system overflows both from the Sewer Authority Midcoast sewage treatment plant and pipes, and locally within the Montara Water Sewer District. These repeated, significant sewage spills appear to result, at a minimum, from antiquated and failing pipes. The proposed project should be evaluated for its impact on this failing sewer system, and for the cumulative sewage impact of this proposed project in conjunction with past, present and future projects. In addition, there should be analysis of what monetary contributions will be necessary from MidPen to ensure that there are no additional sewage spills resulting from adding the proposed project to the already failing sewage system.
- 4) MidPen had a preliminary traffic study prepared by Kittelson Associates in June, 2017 which admitted that the proposed project would increase traffic at the Etheldore/Highway 1 and/or the California/Highway 1 intersections for existing and future trips that would otherwise access Highway 1 at Carlos Street. However, Resist Density believes this study underestimated existing traffic conditions, particularly weekend traffic since the opening of the Lantos Tunnel. This study has underestimated traffic that would be added by the proposed project. The study also did not consider Highway 1 pedestrian crossing proposed under the LCP for this area.



5) Additional traffic analysis – with input from the community – should accurately evaluate existing traffic conditions, project traffic impacts and cumulative traffic impacts at Carlos Street, Etheldore Street and California Street.

6) The last EIR that was done for this site was completed in 1985. This prior EIR did not consider the impacts of the current sewage failures, nor consider greenhouse gas impacts. In addition, there have been numerous changed circumstances in the intervening period. We request that a new EIR be prepared for the project given these factors and given that the last review was done 32 years ago.

7) The current zoning for this site allows for affordable housing on 6 acres leaving approximately 5 acres as open space. We request that MidPen consider scaling back the currently proposed project, in order to have the project better fit with the neighborhood and in recognition of the existing zoning.

\_\_\_\_ Thank you for the opportunity to comment.



Sensible planning and protection  
for the San Mateo County Midcoast

## Key Concerns for MidPen Pre-App Meeting 9/20/17

Proposed Development of Parcel APN 037-022-070 in Moss Beach  
(across from Point Montara Lighthouse)

MidPen's proposed 71-unit housing development discussion has two tracks — the critical housing shortage, which we all recognize, and the inappropriate location for such a large development. Resist Density's concerns focus on the inadequate infrastructure and health / safety dangers of this project.

### **Increased Traffic**

There are no alternative routes on the coast — there is only one road in, through and out. The Midcoast section of HWY 1 is a critical daily travel corridor, and it is limited to one lane in each direction along the scenic portion of Montara. Adding a large housing development to the Midcoast will only compound increased traffic that has occurred since the Lantos tunnel opened in 2013. MidPen has not provided any traffic mitigation solutions for the hundreds of additional cars of this development. Furthermore, "Connect the Coastside" Transportation Management Plan proposes the addition of multiple crosswalks and at least 2 traffic lights in Moss Beach without any recommendation to improve public transit. Questions of disaster preparedness and emergencies requiring first-responder access are coming to head as traffic worsens.

### **MidPen Traffic Assessment is Lacking**

As part of MidPen's Pre-Application, it has released an initial traffic assessment by KAI consultants. The whole premise of KAI's findings that the MidPen project will not significantly impact the HWY 1 / Carlos Street intersection is flawed. We question KAI's numbers of projected car trips the MidPen development will create. How did they arrive at these numbers? Further, it does not take into account the cumulative impact the MidPen project will have when combined with the Big Wave large-scale commercial project, 2 proposed hotels, infill building and second units, and increasing coastal tourism traffic.

### **No Solution to Dangerous Blind Curve**

The proposed MidPen Housing development is located at a dangerous blind curve on Highway 1. KAI field measurements at the HWY 1/Carlos Street intersection found that the sight distance to the South was 305 feet, or about half of Caltrans' required corner sight distance of 605. By KAI's own assessment, grading and/or tree removal will be insufficient to meet the required sight distance due to the vertical dip.

### **All 3 Possible Intersection Controls are Unacceptable**

In addition to the insufficient sight distance, KAI's traffic study recognizes that there are overlapping and conflicting left turns using the same lane for drivers entering Carlos and drivers entering Pt Montara Lighthouse. The pedestrian crossing of HWY 1 is also unsafe. Three intersection controls are evaluated but all have drawbacks and none solve the sight distance problem for drivers or pedestrians:

- 1) Signal/Traffic light control — evaluated, and not warranted
- 2) Roundabout — does not solve the sight distance problem and may be too expensive
- 3) Stop Control — essentially what already exists except add a no-left-turn off Carlos.

### **Roads Safety - Concerns for Children and Pedestrians**

There is no safe way to make a left (southbound) turn off Carlos onto HWY1. The KAI study fails to mention the impact that hundreds of additional cars will have on neighborhood roads, and doesn't note that these roads are substandard — too narrow and lacking sidewalks — posing a safety risk for pedestrians and children



who will have to share the same roads with impatient drivers. Even the proposal to make Carlos one-way southbound doesn't assess traffic impacts to neighborhood streets or the Etheldore intersection.

#### **Population Increase of 26%**

The MidPen housing proposal is for 71 units totaling 144 bedrooms. At maximum occupancy, there would be 359 residents. And this doesn't include guests or visitors to the community center. This development would increase the population of Moss Beach East of HW 1, where this will be built, by 26%. This population increase will take place in one location all at once, as opposed to several decades of gradual development.

#### **Failing Sewer System – SSOs**

The sewer infrastructure on the coast is failing. There have been approximately 101 Sanitary Sewage Overflows (SSOs) over the last 5.5 years, many of which are a result of failed or broken pipes and root intrusion. These overflows endanger public health and the environment. This failing sewer system must be addressed before additional development is approved. What is the assessment of bringing a 71-unit housing development online all at once?

#### **Water Capacity**

Montara Water and Sanitary District states it has plenty of water for this project. In addition to water quantity, there is concern for water allotment, pressure and distribution. Is the water distribution system capable to handle the added burden of an emergency such as a large fire? Is the water infrastructure capable to handle this pace of growth and emergencies? Has this been assessed?

#### **Potential for Environmental damage and the Critical Coastal Area (CCA)**

The 11-acre property is located approximately 200 feet from the Fitzgerald Marine Reserve, an identified CCA. It deserves special protection due to its close proximity to Montara Creek that runs directly into the Fitzgerald Marine Reserve. The scale of the MidPen development would cause substantial disruption and removal of earth, trees and structures with possible toxic hazards. Comprehensive testing must be made throughout the site to check for contamination and toxins such as asbestos, lead, solvents and other chemical compounds that were commonly used at military facilities like these. The site is located on a hill, so any runoff would head directly toward the creek and ocean below.

#### **Cumulative Effects**

The impacts of a large housing development, when combined with other nearby developments such as the approved Big Wave project in Moss Beach (estimated 1500 car trips per day), two proposed hotels in Montara, and the annual infill of new homes, second units, and buildings, will further stress the environment and the public utility infrastructure of this coastal community. With a large brewing company proposed for Big Wave In Moss Beach, what is the projected cumulative impact of these projects on Hwy 1, traffic, the environment and the infrastructure?

#### **Inappropriate / Isolated Location**

Moss Beach is isolated, located seven miles in either direction from the nearest town centers of Half Moon Bay and Pacifica. The Sierra Club Loma Prieta chapter has come out against the MidPen project stating: *"there could hardly be a much worse location for affordable housing in the urbanized Mid-Coast."* This potential development would have a significantly high Vehicle Miles Traveled (VMT) designation, limited walkability, and offers no meaningful public transportation. Lack of access to groceries, jobs, schools, pharmacies, and community-oriented services will make residents dependent on driving, which is a financial burden for affordable housing residents, plus increases traffic problems.

#### **Antiquated Zoning**

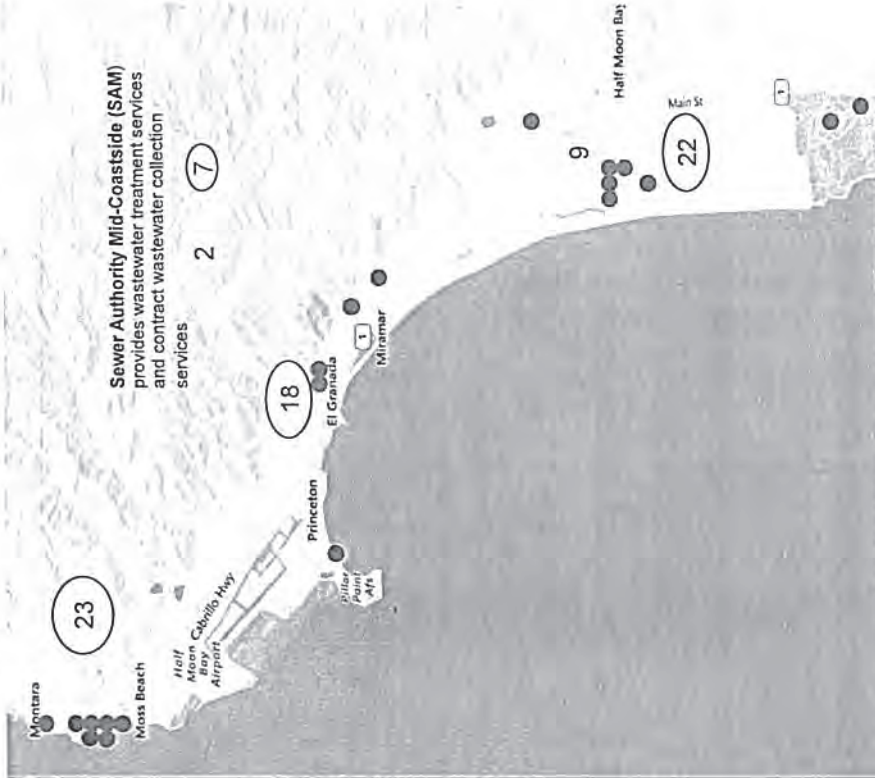
The outdated zoning for this parcel was completed in 1986 based on plans for a multi-lane Hwy 1 bypass around Devil's Slide, and additional infrastructure that never was, nor will be, carried out due to legislation and the purchase of Rancho Corral de Tierra by POST. This 11-acre parcel should have been rezoned to reflect the revised situation and population projections, but was not. We advocate for a rezoning of this property to more accurately reflect infrastructure constraints and current realities.



# Failing Infrastructure: Sanitary Sewer Overflows (SSOs)

A total of 101 overflows were recorded from Half Moon Bay to Montara from 2011 to mid 2017, according to public records. These findings raise significant questions as to whether the infrastructure can accommodate any more large development.

- Overflows are not isolated to specific locations and seem to indicate a systemic issue with the underlying infrastructure and capacity of the sewage systems.



- A total of 20 Category 1 overflows were recorded and released 883,763 gallons to drainage channels leading to surface water e.g. ocean. The San Francisco Regional Water Quality Control Board has issued a \$522,700 penalty for a 344,000-gallon spill at Miramar Beach that was discovered in early March 2017. SAM engineers originally estimated the spill was 756,000 gallons and later lowered the estimate to 746,000 (included in table below) and finally reduced it to 344,000 gallons\*.

Agency / Category	Count	Category 1	Category 2	Category 3	Total
El Granada	19	1	0	18	19
Half Moon Bay	39	8	9	22	39
Montara	28	5	0	23	28
SAM	15	6	2	7	15
Total	101	20	11	70	101

Agency / Category	SSO Vol	Vol of SSO Recovered	Vol of SSO Reached		Not Accounted For
			Surface Water	Water	
Granada SD	3,055	1,295	1,125		635
Half Moon Bay City	167,018	8,781	104,739		53,498
Montara	17,744	9,401	12,970		(4,627)
SAM	776,274	15,470	* 764,929		(4,125)
Total	964,091	34,947	883,763		45,381

Source:  
 •Records obtained by Resist Density through Public Records Act request  
 •Information tabulated through manual review of approximately 10,000 pages of minutes, dashboards, etc., as summarized information was not available. Best effort was employed to assure accuracy.  
 •See appendix for detail by SSO  
 \*Source: HMB Review - State fines SAM \$522,000 for March sewer spill; August 24, 2017

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# Causes of Sanitary Sewer Overflows (SSOs) on the Coastside

Root intrusions, structural problems and failures with the pipes, debris, and grease (FOG) are responsible for approximately 80% of the SSOs.

Cause / Agency	El Granada	Half Moon Bay	Montara	SAM	Total
Root intrusion	10	7	12		29
Pipe structural problem/failure	2	1	6	13	22
Debris	6	10	4		20
Grease (FOG)		11	2		13
Excessive rain		2			2
Flow exceeded capacity		2			2
Pump station failure				2	2
4 manholes blocked, cause not specified			1		1
City contractor fault, main line plugged		1			1
Main plug broke		1			1
Maintenance contractor fault		1			1
N/A	1				1
Pump failure (excessive rain)			1		1
Pump station power failure			1		1
Rainfall exceeded design		1			1
Resident digging		1			1
Root intrusion and debris			1		1
Surcharged pipe		1			1
<b>Grand Total</b>	<b>19</b>	<b>39</b>	<b>28</b>	<b>15</b>	<b>101</b>

Source:

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# Sanitary Sewer Overflows (SSOs) 2011 – mid 2017 1 of 3

EVENT ID	Responsible Agency	SSO Category	Date	Year	SSO Address	SSO City	SSO Vol	Vol of SSO Recovered	Vol of SSO Reached Surface Water	Not Accounted	SSO Failure Point	Cause
760434	Granada SD	Category 3	1/7/2011	2011	557 Isabella Avenue	EL Granada	5	5	0	-	Main	Root intrusion
772989	Granada SD	Category 3	11/10/2011	2011	838 Ferdinand Avenue	EL Granada	40	20	0	20	Main	Root intrusion
786807	Granada SD	Category 3	9/27/2012	2012	260 Balboa Avenue	el granada	5	5	0	-	N/A	N/A
789296	Granada SD	Category 3	12/23/2012	2012	West Point & Stanford Ave	Princeton By the Sea	1,125	0	1,125	-	Main	Pipe structural problem/failure
789570	Granada SD	Category 3	11/19/2012	2012	577 Columbus Street	el granada	1	0	0	1	Upper Lateral	Root intrusion
791731	Granada SD	Category 3	2/14/2013	2013	Columbus & Portola Ave	el granada	25	25	0	-	Main	Root intrusion
791764	Granada SD	Category 3	2/16/2013	2013	35 Valencia st	el granada	150	50	0	100	Main	Root intrusion
792290	Granada SD	Category 3	3/1/2013	2013	523 Balboa Avenue	EL Granada	25	0	0	25	Main	Debris
797045	Granada SD	Category 3	7/16/2013	2013	San Pablo San Pablo Avenue	Half moon bay	50	0	0	50	Main	Pipe structural problem/failure
800431	Granada SD	Category 3	10/19/2013	2013	San Pablo and Alameda Ave	EL Granada	400	350	0	50	Gravity Mainline	Root intrusion
804314	Granada SD	Category 3	1/22/2014	2014	23 Alameda Ave.	EL Granada	577	400	0	177	Gravity Mainline	Debris
807692	Granada SD	Category 3	5/27/2014	2014	855 Palma Street	EL Granada	165	35	0	130	Gravity Mainline	Debris
818101	Granada SD	Category 3	8/30/2015	2015	Portola Ave & Del Monte	EL Granada	5	0	0	5	Gravity Mainline	Debris
819024	Granada SD	Category 3	10/19/2015	2015	643 Isabella St	EL Granada	20	0	0	20	Gravity Mainline	Root intrusion
822599	Granada SD	Category 3	2/16/2016	2016	557 Isabella RD	EL Granada	1	0	0	1	Gravity Mainline	Root intrusion
822826	Granada SD	Category 3	3/6/2016	2016	60 San Pablo Ave	EL Granada	350	300	0	50	Gravity Mainline	Debris
823065	Granada SD	Category 3	3/15/2016	2016	523 Ave. Balboa	EL Granada	1	1	0	-	Gravity Mainline	Root intrusion
823122	Granada SD	Category 3	3/12/2016	2016	16 The Alameda	EL Granada	100	100	0	-	Gravity Mainline	Root intrusion
826956	Granada SD	Category 3	7/29/2016	2016	Vassar St	Princeton	10	4	0	6	Gravity Mainline	Debris
760968	Half Moon Bay City	Category 3	1/5/2011	2011	401 Greenbrier Road	Half Moon Bay	500	0	500	-	Main	Root intrusion
761335	Half Moon Bay City	Category 3	1/15/2011	2011	408 casa de mar Avenue	Half Moon Bay	5	5	0	-	Lower lateral	Grease (FOG)
766171	Half Moon Bay City	Category 3	5/2/2011	2011	600 Grove Street	Half Moon Bay	20	10	0	10	Main	Grease (FOG)
766170	Half Moon Bay City	Category 3	5/3/2011	2011	416 Grove Street	Half Moon Bay	500	400	0	100	Main	Grease (FOG)
766857	Half Moon Bay City	Category 3	5/22/2011	2011	Main Street & Stone Pine Rd	Half Moon Bay	25	0	0	25	Main	Grease (FOG)
770038	Half Moon Bay City	Category 3	8/20/2011	2011	901 alsaice Iorraine Street	Half Moon Bay	329	329	1	[1]	Main	Debris
771701	Half Moon Bay City	Category 3	10/2/2011	2011	307 church Street	Half Moon Bay	25	25	0	-	Main	Grease (FOG)
772135	Half Moon Bay City	Category 3	10/16/2011	2011	170 correas Street	Half Moon Bay	15	0	0	15	Main	Grease (FOG)
773019	Half Moon Bay City	Category 2	11/13/2011	2011	Oak street	Half Moon Bay	3,000	300	0	2,700	Main	Debris
775005	Half Moon Bay City	Category 1	12/4/2011	2011	509 Ocean Street	Half Moon Bay	500	0	500	-	Main	City contractor fault, main line plugged
774252	Half Moon Bay City	Category 3	12/17/2011	2011	411 bayhill Rd	Half Moon Bay	625	0	0	625	Main	Debris
775914	Half Moon Bay City	Category 3	1/16/2012	2012	555 Kelly Avenue	Half Moon Bay	25	25	0	-	Main	Main plug broke
776850	Half Moon Bay City	Category 3	2/4/2012	2012	815 First Avenue	Half Moon Bay	150	150	0	-	Main	Debris
777065	Half Moon Bay City	Category 3	2/9/2012	2012	717 Main Street	Half Moon Bay	4	4	0	-	Main	Maintenance contractor fault

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# Sanitary Sewer Overflows (SSOs) 2011 -- mid 2017 2 of 3

EVENT ID	Responsible Agency	SSO Category	Date	Year	SSO Address	SSO City	SSO Vol	Vol of SSO Recovered	Vol of SSO Reached Surface Water	Not Accounted	SSO Failure Point	Cause
781589	Half Moon Bay City	Category 1	5/23/2012	2012	Turnberry Road (15th hole go	Half Moon Bay	750	150	600	-	Main	Root intrusion
782248	Half Moon Bay City	Category 3	6/19/2012	2012	363 poplar	Half Moon Bay	3	0	0	3	Main	Debris
785048	Half Moon Bay City	Category 3	12/2/2012	2012	kelly ave Avenue ( half moon	Half Moon Bay	200	0	0	200	Main	Excessive rain
789292	Half Moon Bay City	Category 2	12/23/2012	2012	Balboa Boulevard (St. Francis	Half Moon Bay	10,125	500	0	9,625	Main	Flow exceeded capacity
803996	Half Moon Bay City	Category 1	2/17/2014	2014	507 Terrace Ave	Half Moon Bay	2,063	0	2,063	-	Gravity Mainline	Debris
805804	Half Moon Bay City	Category 3	3/21/2014	2014	7-11 parking lot (Main & 92)	Half Moon Bay	3	0	0	3	Gravity Mainline	Debris
805803	Half Moon Bay City	Category 3	3/21/2014	2014	196 San Mateo Road	Half Moon Bay	449	200	0	249	Gravity Mainline	Pipe structural problem/failure
806329	Half Moon Bay City	Category 3	5/21/2014	2014	217 Miramontes Ave	Half Moon Bay	500	0	0	500	Gravity Mainline	Grease (FOG)
807222	Half Moon Bay City	Category 2	6/23/2014	2014	Ocean and Valenz	Half Moon Bay	5,550	0	0	5,550	Gravity Mainline	Grease (FOG)
808001	Half Moon Bay City	Category 2	7/27/2014	2014	260 Magnolia	Half Moon Bay	1,250	0	0	1,250	Gravity Mainline	Grease (FOG)
810402	Half Moon Bay City	Category 3	8/30/2014	2014	170 Correas Street	Half Moon Bay	8,250	0	0	8,250	Gravity Mainline	Debris
810421	Half Moon Bay City	Category 3	9/11/2014	2014	683 Myrtle Street	Half Moon Bay	675	0	0	675	Gravity Mainline	Root intrusion
811604	Half Moon Bay City	Category 3	9/24/2014	2014	First Ave/Myrtle Street	Half Moon Bay	330	330	0	-	Manhole	Root intrusion
816683	Half Moon Bay City	Category 2	12/11/2014	2014	751 First Avenue	Half Moon Bay	99,850	0	99,850	-	Upper Lateral (Pul	Rainfall exceeded design
816685	Half Moon Bay City	Category 2	7/16/2015	2015	409 Granelli Avenue	Half Moon Bay	3,581	75	0	3,506	Gravity Mainline	Grease (FOG)
817579	Half Moon Bay City	Category 3	8/14/2015	2015	551 Myrtle St	Half Moon Bay	3,581	3,581	0	-	Gravity Mainline	Resident digging
817401	Half Moon Bay City	Category 2	8/15/2015	2015	1st Ave/Myrtle street	Half Moon Bay	600	600	0	-	Gravity Mainline	Debris
817535	Half Moon Bay City	Category 3	8/20/2015	2015	604 Grove St	Half Moon Bay	1,875	1,875	0	50	Gravity Mainline	Debris
819457	Half Moon Bay City	Category 3	11/12/2015	2015	411 Bayhill Road	Half Moon Bay	150	0	0	150	Gravity Mainline	Root intrusion
827159	Half Moon Bay City	Category 3	8/9/2016	2016	675 Myrtle	Half Moon Bay	15	2	0	13	Gravity Mainline	Root intrusion
828254	Half Moon Bay City	Category 3	9/17/2016	2016	1230 Lynx Ln	Half Moon Bay	20	20	0	-	Gravity Mainline	Root intrusion
831439	Half Moon Bay City	Category 2	2/20/2017	2017	220 Kelly ave	Half Moon Bay	1,125	0	1,125	-	Gravity Mainline	Flow exceeded capacity
832910	Half Moon Bay City	Category 2	3/17/2017	2017	400 Balboa Blvd	Half Moon Bay	20,000	0	0	20,000	Manhole	Surcharged pipe
833893	Half Moon Bay City	Category 1	3/21/2017	2017	212 Kelly St	Half Moon Bay	300	200	100	-	Lower Lateral (Pul	Excessive rain
764426	Montara	Category 3	3/15/2011	2011	387 Fourth Street	Montara	10	0	0	10	Main	Root intrusion
765329	Montara	Category 1	4/9/2011	2011	140 beach way Way	Montara	50	0	50	-	Main	Pipe structural problem/failure
768827	Montara	Category 3	7/21/2011	2011	821 Ocean Boulevard	Moss Beach	10	0	0	10	Lower Lateral	Pipe structural problem/failure
772467	Montara	Category 3	10/27/2011	2011	11th St & Main St.	Montara	10	0	0	10	Main	Root intrusion
775101	Montara	Category 3	1/2/2012	2012	741 edison Street	Montara	75	75	0	-	Main	Debris
781477	Montara	Category 3	5/18/2012	2012	Marine Blvd and Park way	Moss Beach	400	400	0	-	Main	4 manholes blocked, cause not specified
781676	Montara	Category 1	5/29/2012	2012	Nevada ave Avenue	Montara	1000	0	1000	-	Main	Pipe structural problem/failure
788653	Montara	Category 3	12/1/2012	2012	391 6th St	Montara	50	50	0	-	Main	Root intrusion
789127	Montara	Category 1	12/17/2012	2012	Virginia Avenue & Cabrillo Hi	Montara	100	80	20	-	Main	Grease (FOG)
792729	Montara	Category 3	3/17/2013	2013	8th street farallones Avenue	Montara	750	0	0	750	Main	Debris
810250	Montara	Category 3	9/9/2014	2014	541 Franklin Street	Montara	75	0	0	75	Gravity Mainline	Root intrusion

Source:

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# Sanitary Sewer Overflows (SSOs) 2011 – mid 2017 3 of 3

EVENT ID	Responsible Agency	SSO Category	Date	Year	SSO Address	SSO City	SSO Vol	Vol of SSO Recovered	Vol of SSO Reached Surface Water	Not Accounted	SSO Failure Point	Cause
811405	Montara	Category 3	12/11/2014	2014	100 7th Street	Montara	875	0	0	875	Pump Station-Cor	Pump failure (excessive rain)
811783	Montara	Category 3	12/20/2014	2014	Carlos & Admiral Street Inter	Moss Beach	530	530	0	0	Gravity Mainline	Root intrusion
812110	Montara	Category 3	12/31/2014	2014	140 San Lucas	Moss Beach	5	5	0	0	Gravity Mainline	Debris
812107	Montara	Category 3	1/3/2015	2015	1350 Main Street	Montara	265	265	0	0	Gravity Mainline	Root intrusion
815400	Montara	Category 3	5/21/2015	2015	Valleamar Pump Station (Valle	Moss Beach	750	750	0	0	Force Main	Pipe structural problem/failure
815622	Montara	Category 3	5/29/2015	2015	121 Bernal Ave	Moss Beach	1	1	0	0	Gravity Mainline	Debris
816620	Montara	Category 3	7/10/2015	2015	286 11th st	Montara	100	50	0	50	Gravity Mainline	Root intrusion
819235	Montara	Category 3	10/7/2015	2015	510 6th St	Montara	10	0	0	10	Manhole	Root intrusion
819022	Montara	Category 3	10/15/2015	2015	741 Edison st	Montara	75	0	0	75	Gravity Mainline	Root intrusion
819236	Montara	Category 3	10/28/2015	2015	441 Franklin St	Montara	5	0	0	5	Gravity Mainline	Grease (FOG)
824672	Montara	Category 3	5/17/2016	2016	676 Sierra Street	Moss Beach	20	15	0	5	Gravity Mainline	Root intrusion and debris
825290	Montara	Category 3	5/21/2016	2016	2015 Carlos St.	Moss Beach	225	150	0	75	Gravity Mainline	Root intrusion
825159	Montara	Category 3	5/28/2016	2016	121 Bernal Ave	Moss Beach	3	0	0	3	Gravity Mainline	Pipe structural problem/failure
825687	Montara	Category 3	6/17/2016	2016	851 Loma Vista St	Moss Beach	420	0	0	420	Gravity Mainline	Root intrusion
827060	Montara	Category 3	8/7/2016	2016	2015 Carlos St.	Moss Beach	900	0	0	900	Gravity Mainline	Root intrusion
831952	Montara	Category 3	1/22/2017	2017	8150 Cabrillo hwy	Montara	11000	7000	11000	(7,000)	Pump Station-Pov	Pump station power failure
832361	Montara	Category 3	1/30/2017	2017	140 Beach Way	Moss Beach	30	30	0	0	private force main	Pipe structural problem/failure
764829	SAM	Category 3	3/24/2011	2011	West Point Avenue (Princeto	El Granada	870	870	0	0	Influent main line	Pump station failure
773427	SAM	Category 3	11/22/2011	2011	Valleamar Street (pump statio	Moss Beach	20	0	0	20	Force Main	Pipe structural problem/failure
773484	SAM	Category 3	11/24/2011	2011	Valleamar Street (pump statio	Moss Beach	200	0	100	100	Force main	Pipe structural problem/failure
776285	SAM	Category 3	1/21/2012	2012	Coronado Street & Obispo Rd	El Granada	3136	500	2636	0	Main	Pipe structural problem/failure
776355	SAM	Category 3	1/24/2012	2012	Coronado Street & Obispo Rd	El Granada	500	0	0	500	Main	Pipe structural problem/failure
776402	SAM	Category 3	1/25/2012	2012	Coronado Street & Obispo Rd	El Granada	500	0	500	0	Main	Pump station failure
798461	SAM	Category 3	9/4/2013	2013	141 California Avenue	El Granada	5	0	0	5	air release valve	Pipe structural problem/failure
803569	SAM	Category 3	2/2/2014	2014	Valleamar St (near 2066 Valle	Moss Beach	693	0	693	0	Force Main	Pipe structural problem/failure
811436	SAM	Category 3	12/13/2014	2014	2066 Valleamar Street	Moss Beach	500	0	0	500	Force Main	Pipe structural problem/failure
821237	SAM	Category 3	1/20/2016	2016	Between 2166 and 2150 valle	Moss Beach	625	400	0	225	Force Main	Pipe structural problem/failure
829271	SAM	Category 2	10/19/2016	2016	470 Fortado Lane	Half Moon Bay	2400	500	0	1,900	Force Main	Pipe structural problem/failure
833531	SAM	Category 2	3/1/2017	2017	311 Magellan Ave	Half Moon Bay	* 746000	13000	746000	(13,000)	Force Main	Pipe structural problem/failure
834198	SAM	Category 3	4/2/2017	2017	Furtado Lane & Cabrillo Highw	Miramar	15000	0	15000	0	Force Main	Pipe structural problem/failure
834641	SAM	Category 2	4/16/2017	2017	501 Alto Ave	Half Moon Bay	5625	0	0	5,625	Force Main	Pipe structural problem/failure
835414	SAM	Category 3	5/16/2017	2017	3029 Cabrillo Hwy	Half Moon Bay	200	200	0	0	Force Main	Pipe structural problem/failure

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

To: San Mateo County Board of Supervisors  
From: Resist Density Board of Directors  
Re: Allocation of Measure K Funding for MidPen Moss Beach Housing Project  
Date: October 31, 2017

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We are writing to express our **deep concern with the upfront allocation of \$1.5 million** (\$.5 million previously allocated) for the MidPen Cypress Point proposed project **before an actual application, EIR, or comprehensive traffic study is submitted.**

There are serious problems with this location for an affordable housing project - or luxury project for that matter - on the Coastsides. The property is ill-suited for a large cluster of housing units. It is located at a dangerous blind curve on Highway 1, isolated from any community-oriented services, lacking infrastructure, adequate transit and walkability. This development could increase the population of Moss Beach East of HWY 1 by 26% and worsen traffic problems, road safety, and environmental conditions.

In response to MidPen's pre-application, we have raised the following questions to the County. We have yet to receive any response, and we call on the Board of Supervisors to address these community concerns before any allocation of funds is approved:

- 1) As you know, the site was formerly a top-secret Naval anti-aircraft training center. We request that MidPen conduct soil samples in consultation with the community regarding what contaminants to test for and what locations to sample on the site.
- 2) This location is in a "Very High Fire Hazard Severity Zone." We request from MidPen an estimate of GPD (gallons/day) of water for projected residential units, plus landscaping, plus water for fighting fires, and the impact of increased demand on water flow should a major fire incident occur.
- 3) There have been numerous sewage system overflows both from the sewage treatment plant, SAM, and locally within the MWSD. Both systems appear to suffer from aging pipes at a minimum. How has the system been evaluated or how will it be improved to assure the systems will be adequate to handle this and other large-scale project?
- 4) MidPen provided a preliminary traffic study that left many factors out. In addition to what has already been addressed in our key concerns, MidPen must address the problems at the intersection of Carlos Street and Etheldore as compounded by the traffic on Highway 1 now that the Lantos Tunnel has contributed to a significant increase in Highway traffic, as well as the blind curve. A traffic study must also extend beyond the MidPen property boundaries and include the cumulative impacts of other developments like Big Wave.
- 5) The last EIR that was done for this site was completed in 1985. Many significant factors have changed, new alternatives should be considered and new standards for safety are now available. We request that Mid Pen prepare a new EIR for the project as the last review was done 32 years ago.

Thank you for your consideration.



## Midcoast Community Council

*An elected Advisory Council to the San Mateo County Board of Supervisors  
representing Montara, Moss Beach, El Granada, Princeton, and Miramar*  
P.O. Box 248, Moss Beach, CA 94038-0248 - [www.MidcoastCommunityCouncil.org](http://www.MidcoastCommunityCouncil.org)

Lisa Ketcham   Dave Olson   Claire Toutant   Dan Haggerty   Chris Johnson   Brandon Kwan  
Chair   Vice-Chair   Secretary

Date: September 27, 2017  
To: Michael Schaller, Project Planner  
CC: Steve Monowitz, Community Development Director  
Renée Ananda, CCC Coastal Program Analyst  
From: Midcoast Community Council/ Lisa Ketcham, Chair  
Subject: **Proposed 71-Unit MidPen Affordable Housing Community on 11 acres  
at Carlos & Sierra St, Moss Beach – PRE2017-00032, APN 037-022-070**

MCC has closely followed the evolution of the proposed affordable housing community beginning with hosting a MidPen Housing introduction at our 2/10/16 meeting with 45 members of the public in attendance. MCC bi-monthly meetings provide a forum for video-recorded public comment. MCC website includes an Affordable Housing page with accurate background information and timely news posts with updates on this development proposal. Individual MCC members attended all three MidPen open house community meetings in 2016 and the County Pre-Application Workshop on 9/20/17.

Many of the community concerns regarding the proposed project are long-standing Midcoast issues that are the subject of the Highway 1 Safety & Mobility Improvement Studies (Mobility Study), the Midcoast Highway 1 Crossings Project and the soon-to-be-released wrap up of Connect the Coastside. Each of these planning efforts has a page with all source documents on the MCC website. Some of our comments here relate to the larger issues, but the hope is that this project will focus County attention to address these needs in Moss Beach.

### **Development Density**

MCC has consistently advocated for the need to significantly reduce Midcoast residential buildout numbers. The 71-unit project reduces the overall number of units on this parcel to less than half of the 148 allowed under current PUD zoning while increasing the affordable portion to 100%. The project will include an LCP zoning amendment to change medium-high density to medium density residential, consistent with the surrounding neighborhood.

### **Public Transit**

The project site is located on the Highway 1 corridor adjacent to SamTrans Route 17 bus stop. Route 17 directly reaches Coastside job hubs in Half Moon Bay, Princeton, and Pacifica (10 minutes to Linda Mar and 25 minutes to downtown HMB). Current #17 service is hourly on weekdays, and every two hours on weekends. However, on weekdays at this location there is no southbound AM or northbound PM service because #17 is routed via Sunshine Valley Road at those times. Route #18 has limited weekday service to Middle and High School in HMB but is also routed via Sunshine Valley.



This project highlights the urgent need for expanded Coastsides public transit and the funding that requires. Quite simply, without convenient school and commuter bus service at this location on the highway corridor, this project cannot be justified.

### **Bike/Pedestrian Mobility**

A safe crossing is needed at the lighthouse/16<sup>th</sup> St. for the southbound bus stop and for the Coastal Trail which crosses the highway there. A raised median refuge island, proposed in the Mobility Study, would enable two-stage crossing, one direction of traffic at a time, without the need to stop traffic, which is particularly important where sight distance is limited. The community preference for that plan was thwarted in 2015 when Crossings Project traffic engineers estimated it would require extensive road widening and cost \$4.6M. The only other choice offered was painted crosswalk with flashing beacons for \$520K. In 2016 Connect the Coastsides estimated only \$170K for the Mobility Study concept plan the community had initially strongly supported. This discrepancy needs to be sorted out and the community allowed another look at a preferred alternative with the proposed new housing in mind.

Another detail usually overlooked, is that in 2012, Caltrans widened the pavement and added the center left-turn lanes at Carlos and 16<sup>th</sup> without any public process or consideration of the Mobility Study concept plans just adopted. Vehicle safety was improved at the expense of bike/pedestrian safety.

Trail surface and safety improvements are needed on the east side of the highway between 16<sup>th</sup> and 14<sup>th</sup> across the Montara Creek ravine. This trail segment serves both the Coastal Trail and the future Midcoast Parallel (Multi-Modal) Trail. A popular concept plan is included in the Mobility Study. MCC has advocated for more simple near-term improvements to no avail. Residents of the MidPen project will need to use this trail to access the northbound bus stop at 14<sup>th</sup> St, unless space could be made to move the bus stop to 16<sup>th</sup> St.

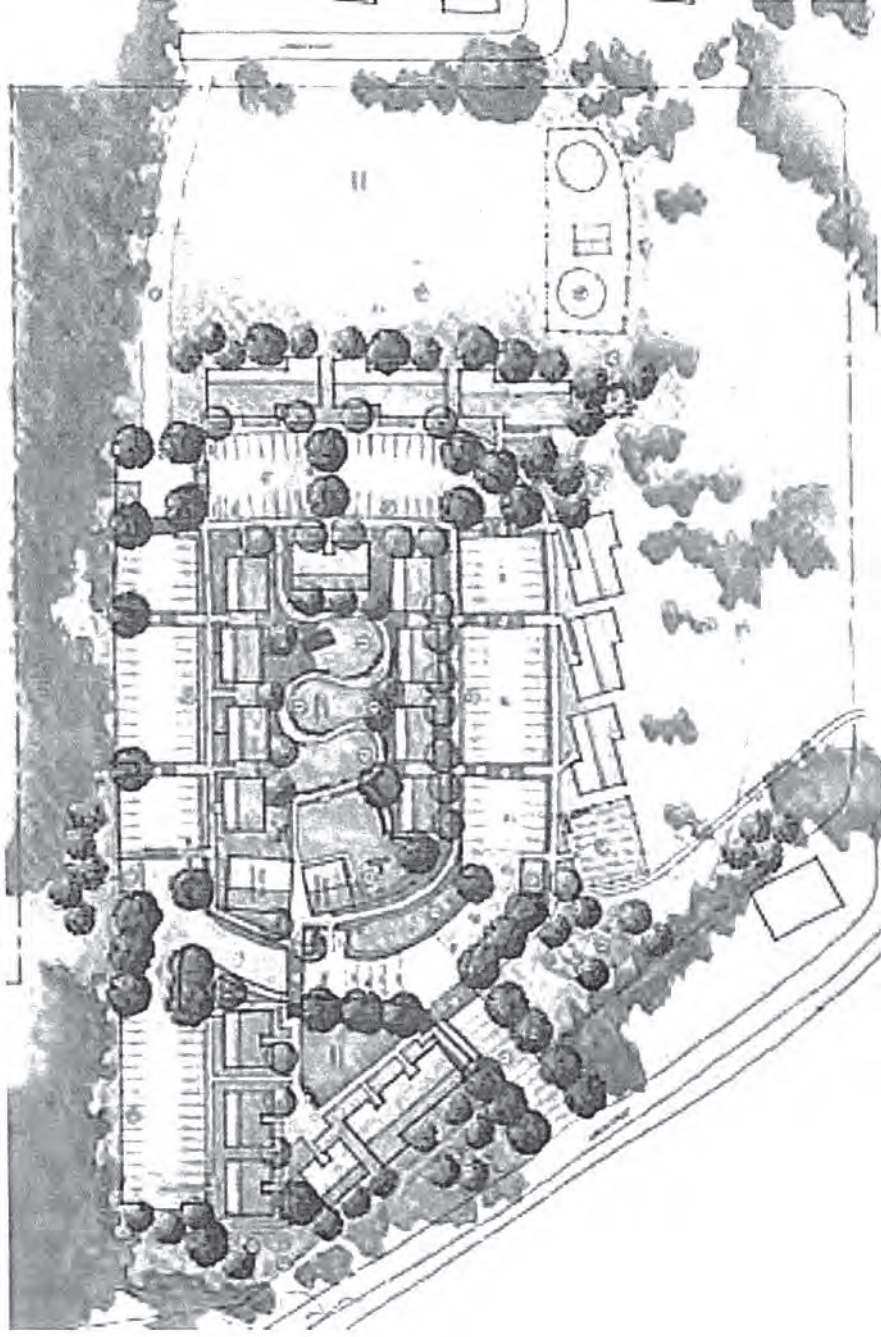
If this housing project is to proceed, the Parallel Trail segment in this area must be prioritized and implemented, at a minimum between downtown Moss Beach and 14<sup>th</sup> St. Creating a bike/pedestrian-friendly community and calming highway traffic will help draw the kind of neighborhood commercial businesses needed to serve existing and future residents.

### **Vehicle Highway Access & Safety**

Highway traffic calming measures would substantially improve safety at the Carlos and 16th St intersections with Highway 1 where sight distance is limited. Lower highway speed shortens the sight distance required for safe stopping and cross-traffic movements. The Mobility Study suggests raised medians and other features for traffic calming. In addition to further analysis and refinement of Mobility Study concept plans for the area, please fully assess the feasibility of rerouting Carlos St to 16<sup>th</sup> St for safer vehicle highway access.

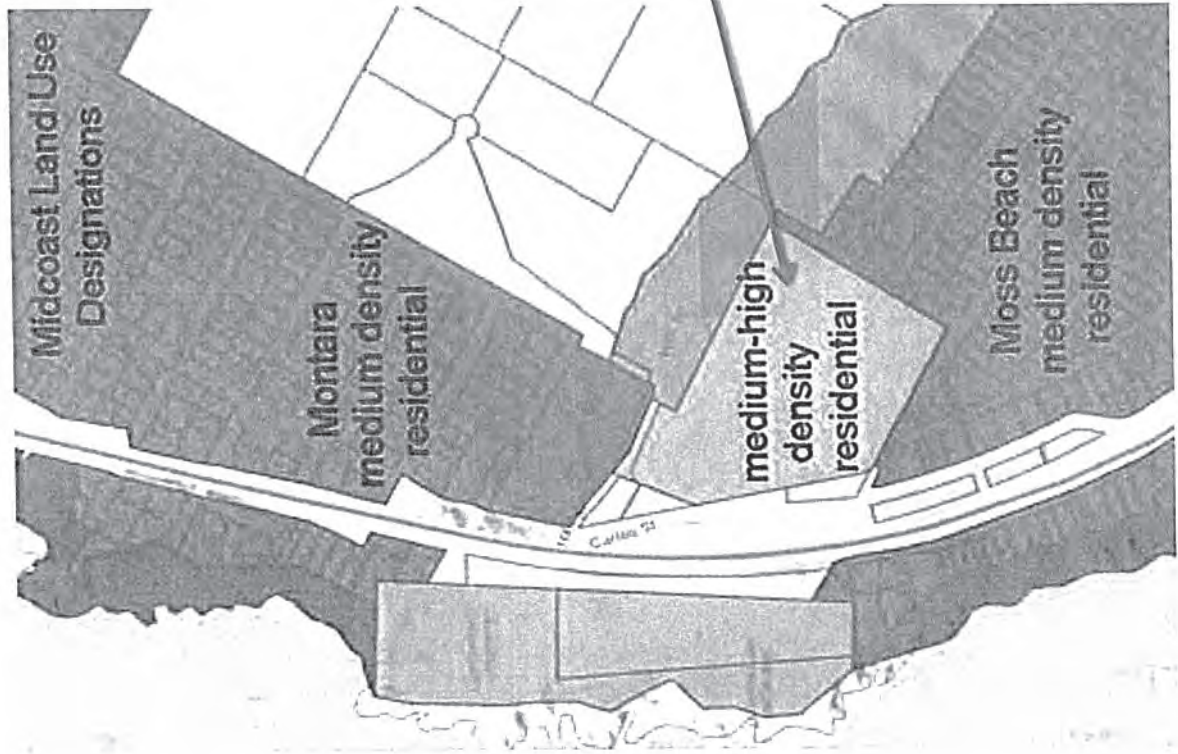
Thank you for the opportunity to comment.

Proposed 71-Unit MidPen Affordable Housing Community  
on 11 acres at Carlos & Sierra St, Moss Beach  
PRE2017-00032



Midcoast Community Council  
9/27/2017 (L.Ketcham)





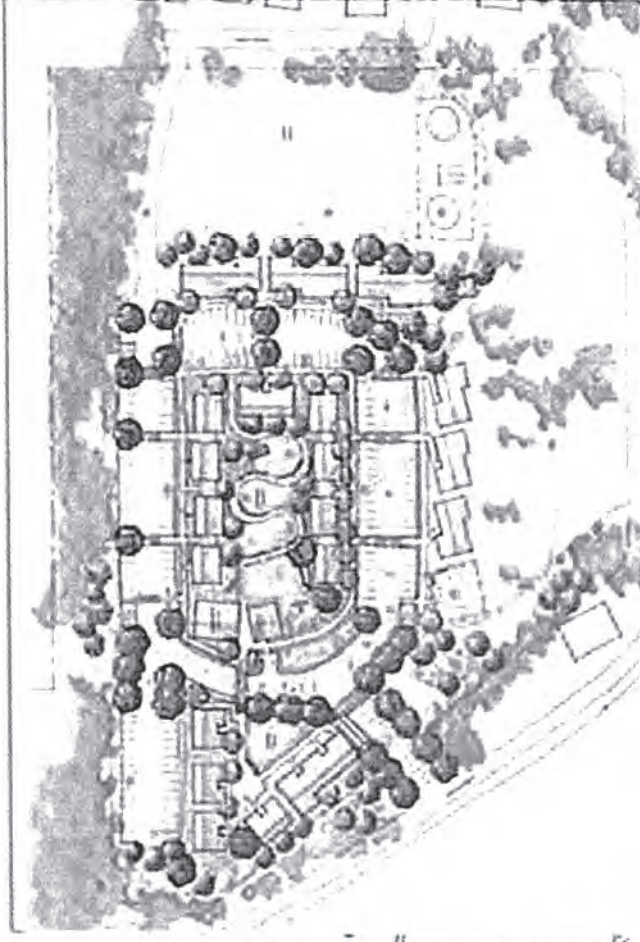
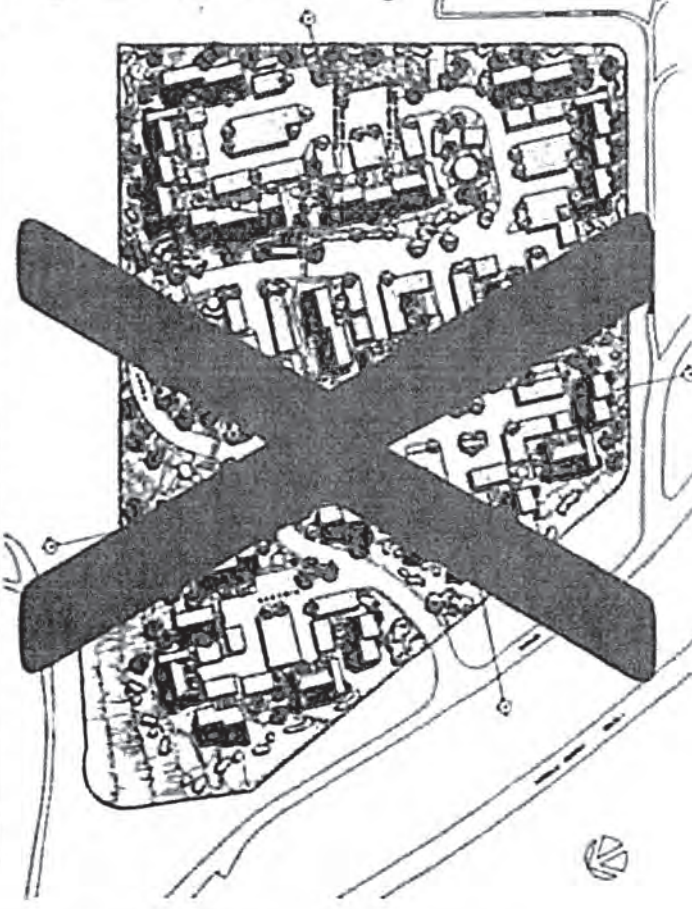
## Development Density

Medium-high density zoning will be changed by LCP amendment to medium density – the same as the surrounding single-family neighborhoods.

Second units are not allowed in multi-family housing, but are allowed in single-family neighborhoods.

## Previously Approved PUD Design

## MidPen Design



- 148 Units
- No public open space
- 2 parking spaces/unit
- 35% affordable

- 71 Units
- Half public open space
- 2.27 parking spaces/unit
- 100% affordable



## Economic Demographic

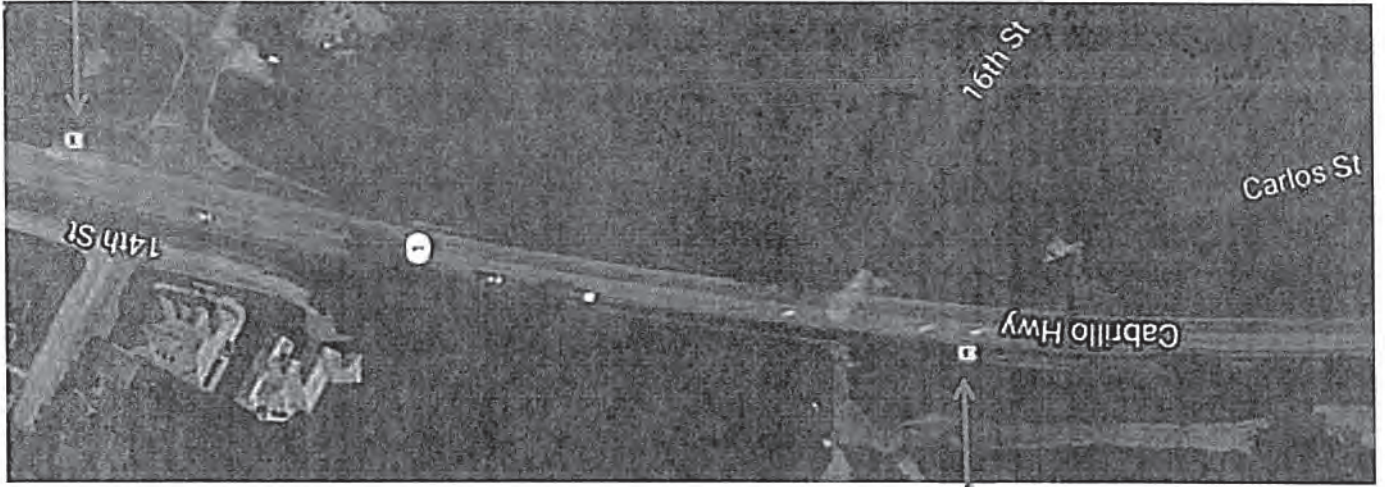
(AMI = average county median income)

The units will be a targeted towards a range of incomes – the lowest will be targeted to households earning 30% AMI, whereas the highest will be 80% of AMI. There will also be units targeted at income levels in between that – so targeted to incomes at 40%, 50%, and 60% AMI.

- A family of four seeking to live in a unit targeted to 80% of AMI could earn at most \$105K, or a household of two people could earn at most \$84K.
- For units targeted to 30% AMI, a family of a four could earn up to \$39K, or a two-person household could earn up to \$32K.
- Most families would be earning somewhere in between these numbers in order to be eligible to live at the development

This is not a “Section 8” development. Under County requirements, MidPen will be required to reserve four units for households that are at risk of homeless and can use Section 8 tenant-based vouchers. Beyond those four units, MidPen is not targeting any units towards households with Section 8 vouchers.

MidPen is specifically planning on implementing a Coastside work preference so we can target people who do have jobs on the Coastside.



## Public Transit

### SamTrans #17

Southbound bus stop at Carlos/Hwy 1

Northbound bus stop at 14<sup>th</sup> St/Hwy 1

Weekdays hourly – weekends every 2 hrs

Reaches Coastside job hubs in HMB, Princeton, Pacifica  
10 min to Linda Mar – 25 min to downtown HMB

But!!

No weekday #17 service southbound AM or northbound PM,  
when route follows Sunshine Valley Rd

No #18 school service to HMB

Nearest stop at those times is Montara Main/6<sup>th</sup>, 0.6 miles away, or  
Etheldore/Sunshine Valley, 0.8 miles away.

Without convenient school/commuter bus service at this location  
on the highway corridor, this project cannot be justified.



## Carlos St - Hwy 1 intersection

### Initial traffic count & study:

- Limited usage under existing conditions
- No significant intersection delay due to project (therefore no need to evaluate intersection control)

### Safety concerns:

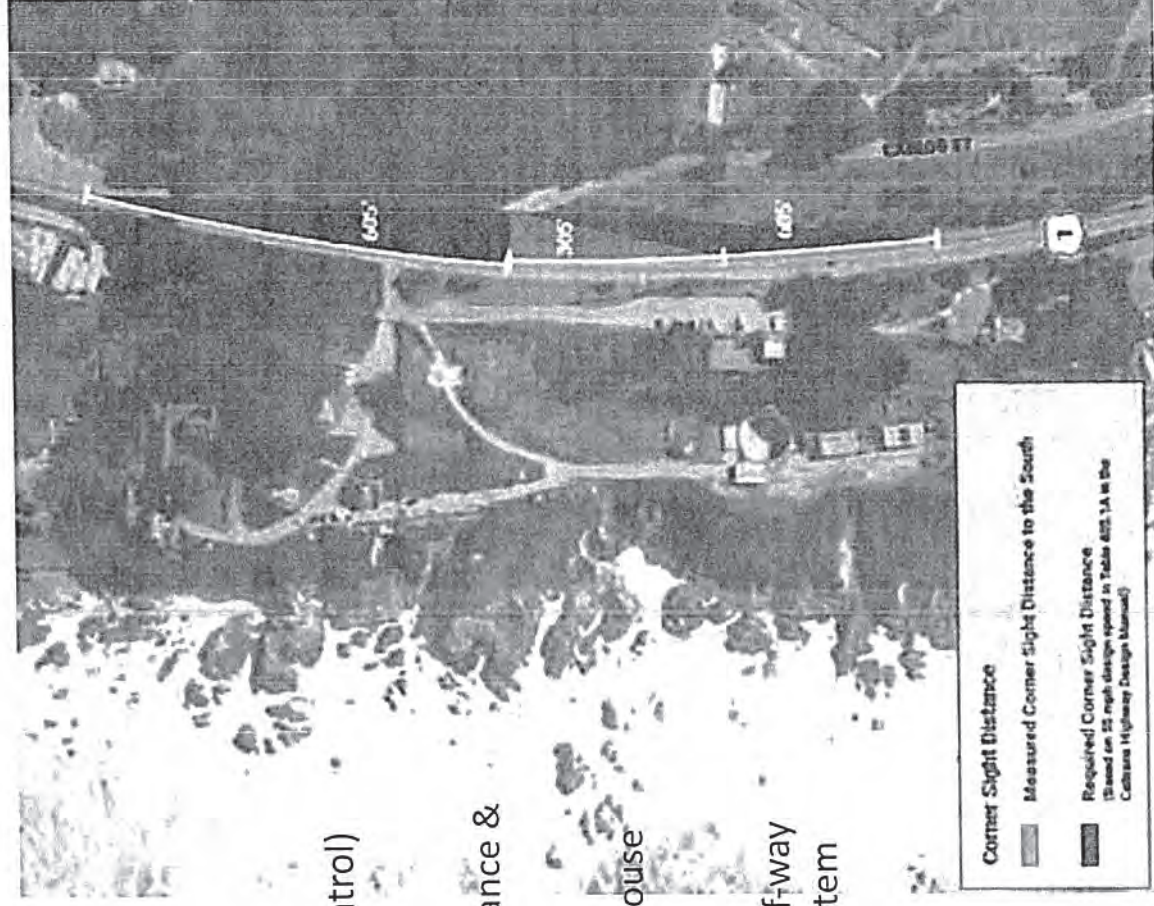
- Left turn onto hwy unsafe due to poor sight distance & 50 mph speed
- Right turn off hwy is sharp U-turn
- Two-way center left-turn lane shared with lighthouse

### Neighborhood streets:

- substandard development but adequate right-of-way
- some streets not in County-maintained road system

### MidPen next steps:

- Detailed traffic study
- Solicit community input on options
- Coordinate with County/Caltrans



# Road Standards for Montara, Moss Beach, Princeton, Miramar, adopted 1994 (most Moss Beach Heights street rights-of-way are 50 ft, with a few segments at 40 ft)

## SAN MATEO COUNTY DEPARTMENT

OF

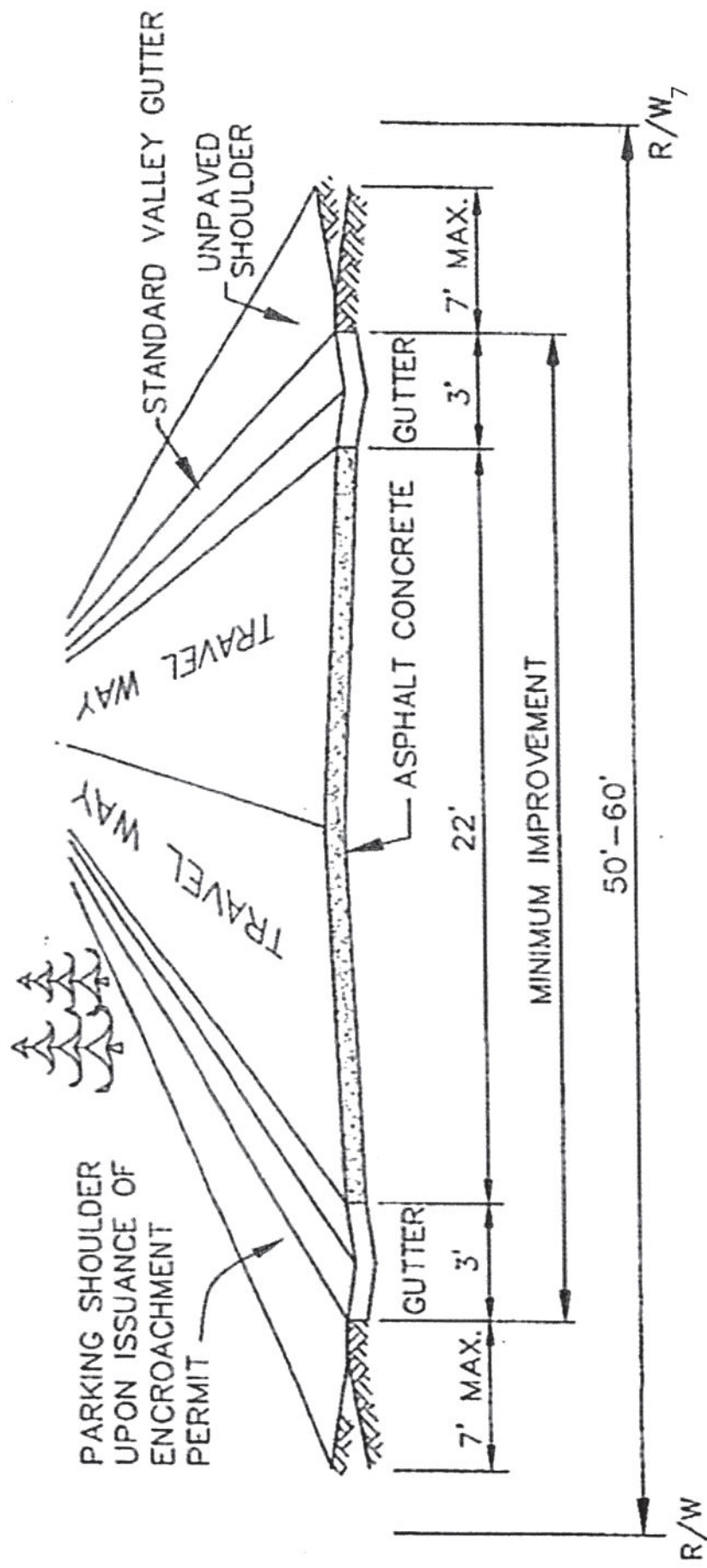
PUBLIC WORKS

REDAWOOD CITY

CALIFORNIA

SCALE: NONE  
DATE: 4/97  
REVISED:

DRAWN BY: D.P.  
CHECK BY: J.A.L.  
APPROVED BY: N.R.C.



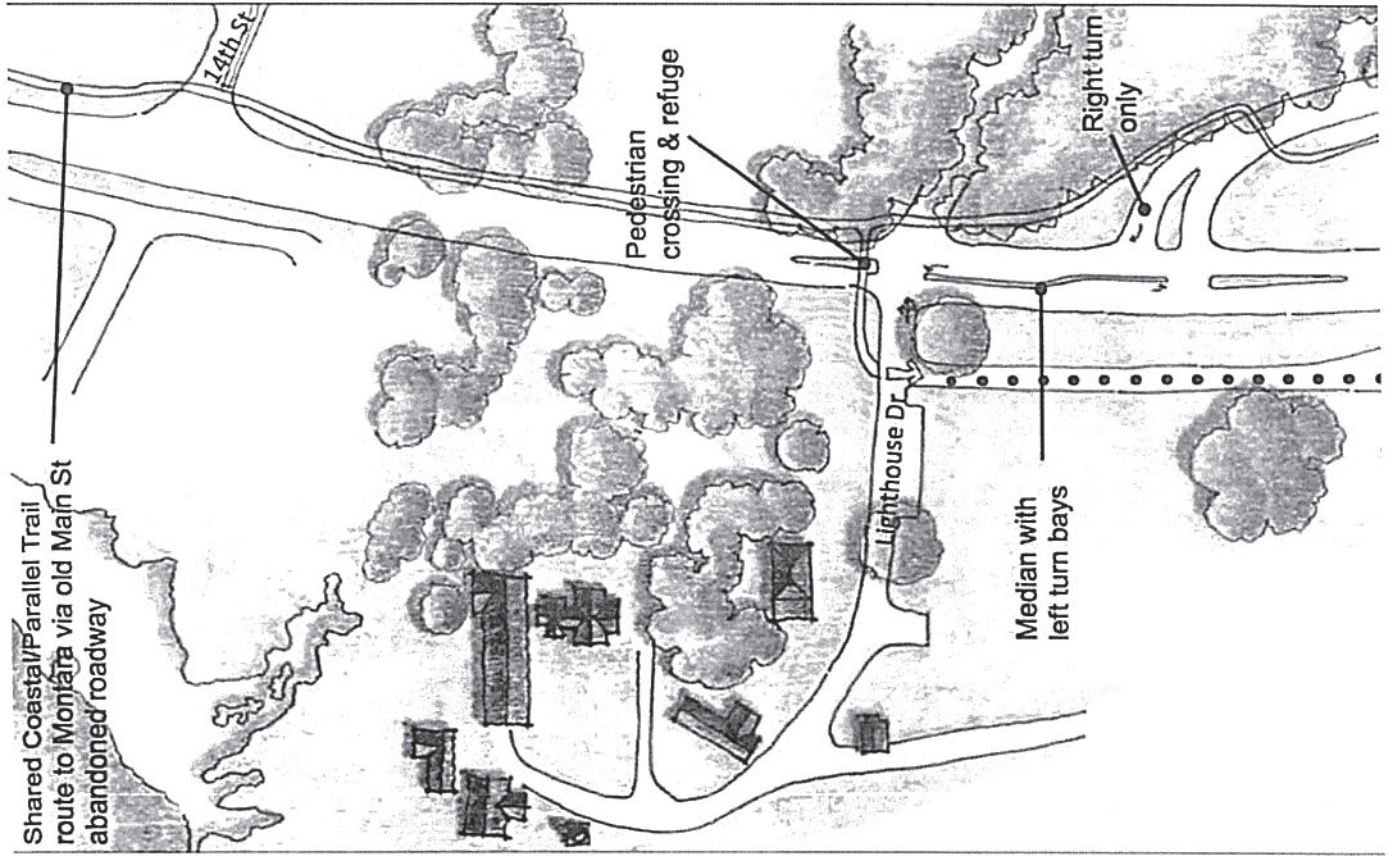
## Bike/Pedestrian Mobility

- Safe crossing needed at lighthouse/16<sup>th</sup> St. – Raised median refuge island enables 2-stage crossing, one direction of traffic at a time, without the need to stop traffic.
- Parallel Trail segment in this area must be prioritized and implemented.

## Vehicle Highway Access & Safety

- Highway traffic calming measures to reduce speed & improve safety
- Further analysis/refinement of Mobility Study concept plans for the vicinity.
- Feasibility of rerouting Carlos St to 16<sup>th</sup> St for safer vehicle highway access and deletion of 2-way center turn lane.





2012 Hwy 1 Safety & Mobility Study  
concept plan – lighthouse area

Right-turn only proposed at Carlos

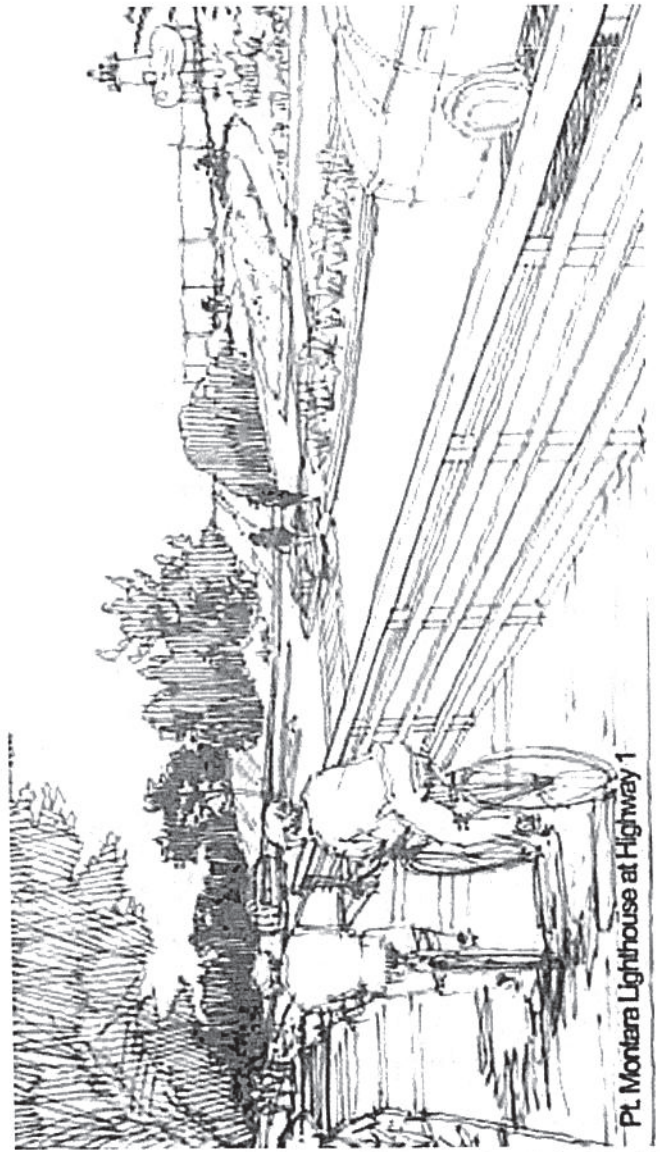
West-side Coastal Trail crosses highway at  
Lighthouse.

Parallel Trail on east side follows Carlos thru  
Moss Beach and shares Coastal Trail north of  
16<sup>th</sup> via east-side highway and old Main St  
abandoned roadway north of 14<sup>th</sup>





Lighthouse/16<sup>th</sup> St crossing & east-side trail 16<sup>th</sup>-14<sup>th</sup> improvements



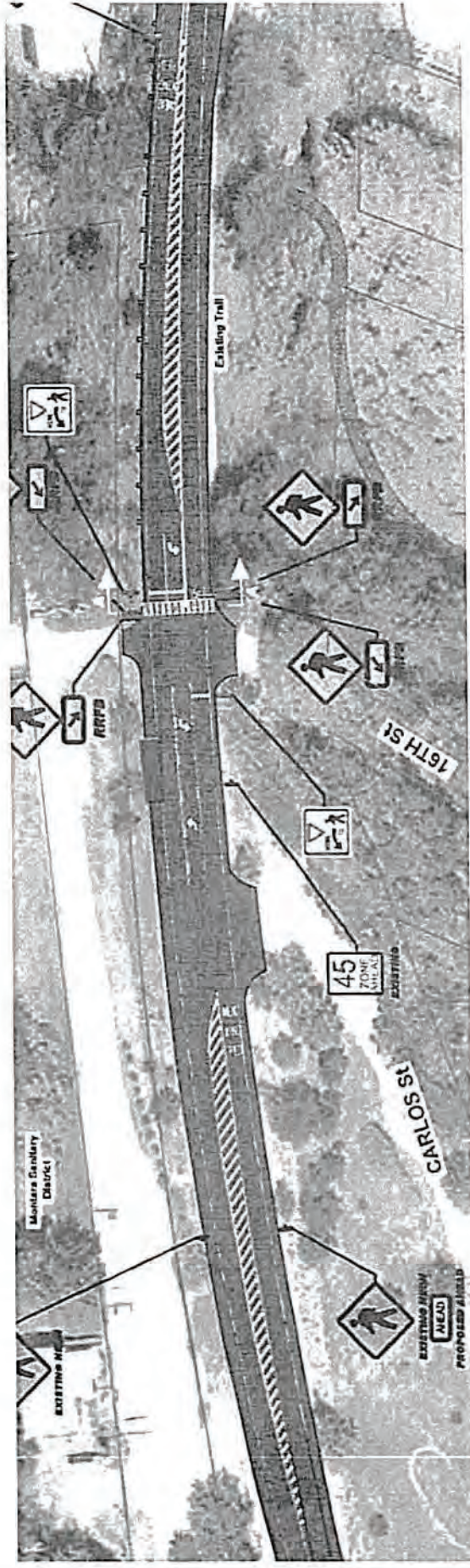
Pt. Montara Lighthouse at Highway 1



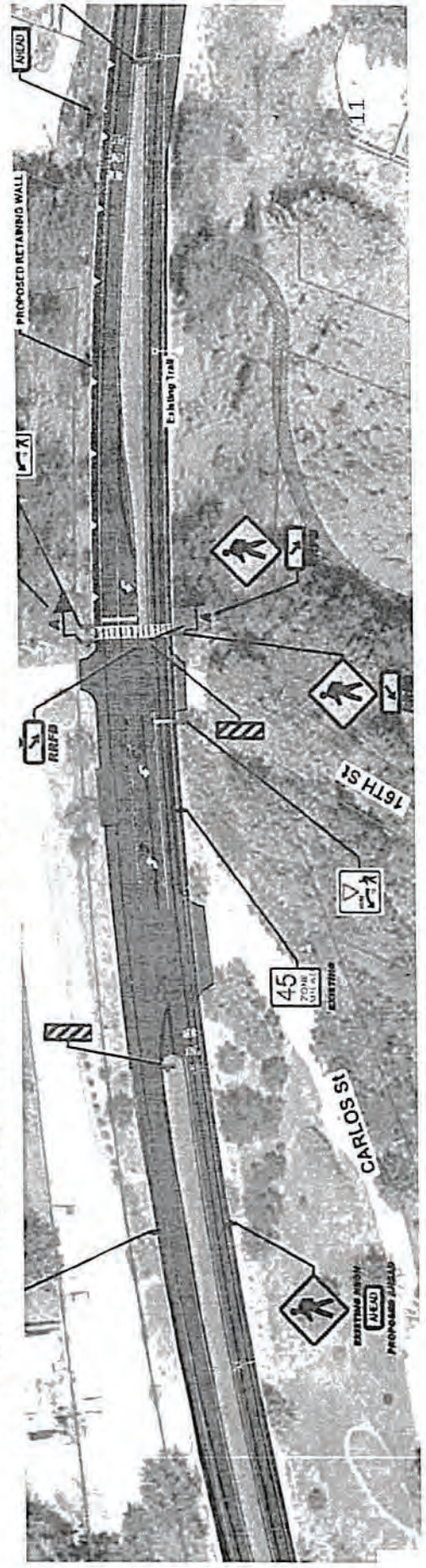
Mobility Study concept plan for  
east-side trail across ravine &  
crossing with refuge island



2015 Lighthouse/16<sup>th</sup> crossing, design Alternative 1:  
 painted crosswalk with pedestrian-operated flashing beacon



2015 crossing design Alternative 2: raised medians with refuge island







**County of San Mateo - Planning and Building Department**

# **ATTACHMENT B**





## San Mateo County Planning Department Pre-Application Public Workshop

El Granada Elementary School

Multi-Purpose Room

400 Santiago Avenue

El Granada, CA 94019

6:00-8:00 Scheduled

Facilitators Agenda

**Purpose:** The purpose of the Pre-Application Public Workshop is to provide for and foster early public involvement and input on a major development project and, to the extent feasible, resolve potential issues before the applicant submits the necessary Planning applications initiating the County's formal review process. The public workshop is for informational purposes only and shall not confer or imply any approval or rejection of the proposed project by the County of San Mateo.

### Objectives

- Educate community on Planning Department protocol and process, and applicant project
- Obtain community feedback on proposed planning project

### 1. Questions

- Will planning commission meeting be held on the coast?
- *Moonridge* – What is parking allocation per unit?
- Will they have access mid-post to the Community Center?
- *Referencing the map:* Will the private road remain private?
- How are you going to enforce the parking for family being allocated?
- How are you saying that the acreage is comparable when it is congested?
- If you restrict Carlos Street, will all the residents have to go around N/S?
- Why the change → to low income housing → 70 plus → instead 30 that was promised?
- How many students will be expected to live in this double housing?
- What schools will they attend? What is the mode of transportation?
- Any traffic studies → around time?
- Where will they be working → as it pertains to impact to traffic/public transportation as this pertains to the rush hour → 2pm?

- Clarify the density → compared to number of people to vs. the density of outside?
- Why didn't the study represent the traffic patterns? What was the due process → why wasn't it transparent?
- Was the safety of the general public considered → Carlos St?
- What do they have planned for families as it pertains to → basketball etc → Community Center → address the needs now → than to start later
- What are the plans for public services, disaster preparedness → FD etc. How is Mid-Pen addressing this?
- And the security for the parking lot? Lights etc. How are they addressing the fire emergency services? 16<sup>th</sup>/15<sup>th</sup>? What is the fire plan?
- How much overcrowding is there in each household? / Income class in the community? Social and Environment problem.
- *Referencing affordable housing*: If there is also an increase in crime, how will that be managed?
- Who is keeping track of the 2<sup>nd</sup> units?

## **2. Additional Community Questions**

- What about all the extra traffic? (No local jobs so all the complex residents will be commuters)
- Will "complex" residents be permitted to have over-flow parking on local streets outside the complex?
- Have you thought about the burden on low-income residents who must drive to jobs if gas goes back up to \$4.00 per gallon? (The closest grocery stores are 14 miles round trip – jobs are mainly "over the hill")
- Will San Mateo County build a Community Center for unincorporated Mid-Coast residents? If so, when? (The proposed complex will have "their own" community center tax payers will subsidize!!)
- Have you considered a lower-density project with a community center that everyone can use?
- Have you considered creating a Seniors-only Complex on this site instead of for families w/ many cars?

- Have you considered the over-all effect of traffic and high-cost of living in the area on the less affluent residents? Please don't shoe horn this in because of Zoning!
- What about the increased crime statistics on the Mid-Pen subsidized housing projects?
- Given the financing of the Mid-Pen Project – how can units legally be set aside for local current responses?
- What percentage of units? – Working in area does not meet the HUD mandate.
- Will the County Supervisors support a citizen's oversight board (staged rotation) to monitor county, public funds, investors on supporting non-profit organizations? Public money involved in developments skirt the bid process etc.
- Are there other more accessible sites on the coast side that are available and/or being considered for low-income housing?
- What will the county be investing to provide infrastructure for the proposed community?
- Can local workers be given preference for housing in the proposed community? – Is such preference legal?
- What will the county do to address infrastructure issues that arise with the development of this community? i.e. traffic, sewer, environmental impact
- I would like to question how the parking ratio of 2.27 spots per unit was derived.
- Why do you feel that this number adequately addresses the parking requirements for residents?
- Do you feel it is an acceptable solution for parking at Cypress Point to overflow into the streets adjacent to the property?
- What will the county do to prevent bullying and harassment by resistdensity.org in future meetings?
- How many persons are allowed to live in each dwelling?
- Why PUD – PUD affordable zoning change?
- Does Mid-Pen, as a non-profit, pay property tax?

### **3. Comments/Suggestions**



- Told access that privately maintained roads would remain private. (Lincoln, Sierra, Buena Vista)
- Miscalculation of usage of acreage that is not representative
- Parking 2.27 is not roundable to 3
- Consider shuttle service to schools, HMB, general services
- Please build this sort of project on Transit Corridors in Daly City – Redwood City – Foster City – San Mateo and once the infrastructure on the Coast improves – build it later!
- Consider response time of fire department using Carlos St.; also response going South; utilization both ways
- Pillar Ridge is already designated low-income
- Recreational facilities available to general public before adding additional low-income housing
- Cannot provide for emergency services
- Tourist/holiday/traffic
- Heavy traffic during rush hour
- Infrastructure not ready for affordable housing – fix it so that HMB can be ready
- Previous slides → Meeting in September? → Is this still the case?
- Next time need mics
- Are slides available? → Can be included in attachment
- County has made promise about serving needs of disabled, first – so where is that?
- How can you guarantee the 2-3 car spaces per household – especially given the cost of housing and the doubling up on housing
- I applaud Mid-Pen's pursuit of affordable housing, however this truly is not an appropriate location for it. Please consider a community with sufficient infrastructure
- There's plenty of room to widen that street 2-way to project entrance & install traffic light
- Maybe do community meeting to present process & explain how approval is built through studies and opportunity for public comment

- Traffic analysis should include entire commute corridor to the San Mateo Peninsula
- Traffic analysis should account for
  - Increased tourism
  - Other anticipated projects
- Lack of fire support in heavily wooded area is prime to a major fire
- More police are needed as the Sherriff of Fire if closed at night

### **3. Information**

- [Mschaller@smcgov.org](mailto:Mschaller@smcgov.org)
- [Mvilchez@pcrcweb.org](mailto:Mvilchez@pcrcweb.org) - Michelle Vilchez



**County of San Mateo - Planning and Building Department**

# ATTACHMENT C



**DEPARTMENT OF TRANSPORTATION**

DISTRICT 4

OFFICE OF TRANSIT AND COMMUNITY PLANNING

P.O. BOX 23660, MS-10D

OAKLAND, CA 94623-0660

PHONE (510) 286-5528

FAX (510) 286-5559

TTY 711

www.dot.ca.gov

*Making Conservation  
a California Way of Life*

September 25, 2017

GTS # 04-SM-2017-00118

GTS ID: 7281

SM-001-53.833

Mike Schaller, Senior Planner  
County of San Mateo  
455 County Center, 2nd Floor  
Redwood City, CA 94063

**Cypress Point Planning Permit Application Referral**

Dear Mr. Schaller:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Cypress Point project. In tandem with the Metropolitan Transportation Commission's (MTC) Sustainable Communities Strategy (SCS), Caltrans' mission signals a modernization of our approach to evaluate and mitigate impacts to the State Transportation Network (STN). Caltrans' *Strategic Management Plan 2015-2020* aims to reduce Vehicle Miles Traveled (VMT) by tripling bicycle and doubling both pedestrian and transit travel by 2020. Our comments are based on the July 18, 2017 Planning Permit Application Referral. Further comments may be forthcoming pending final review. Due to issues associated with access to the STN, further coordination between Caltrans and the Lead Agency will be necessary.

***Project Understanding***

Major Development Pre-Application for the construction of 71-unit affordable housing community (16 1-BR, 37 2-BR, 18 3-BR) of two-story structures with dedicated open space and walking trails, on a 10.875 acre site (currently zoned PUD-124); project would minimally require a rezoning and CDP. All except manager's unit will be rented to individuals earning less than 80% Area Median Income (AMI). The project will be accessed from Carlos Street, and is less than 750 feet from the intersection of Carlos Street and State Route (SR) 1.

***Lead Agency***

As the Lead Agency, the County of San Mateo is responsible for all project mitigation, including

any needed improvements to the STN. The project's fair share contribution, financing, scheduling, implementation responsibilities and lead agency monitoring should be fully discussed for all proposed mitigation measures.

### ***Multimodal Planning***

This project plans to include dedicated bicycle and pedestrian facilities. Areas adjacent to the project site have proposed Class I Bike Paths, and Class II Bike Lanes associated with the Highway 1/Coastal Trail/Parallel Trail, as outlined in the *2011 San Mateo County Comprehensive Bicycle and Pedestrian Plan*. Measures, such as the construction of proposed bicycle and pedestrian facilities that connect the project site to regional activity nodes, and strategies outlined in the *Highway 1 Safety and Mobility Study*, including roadway design features to reduce vehicle speed should be taken to ensure safe accessibility and mobility to project residents and other users.

This site is near a Samtrans bus stop serving the #17 bus. Measures should be taken to ensure safe and convenient access and waiting areas for passengers. These measures should include crosswalks and appropriate pedestrian access to the bus stop. This bus operates on headways of approximately one hour, measures to increase the level of service should be taken.

### ***Vehicle Trip Reduction***

From Caltrans' *Smart Mobility 2010: A Call to Action for the New Decade*, the project site is identified as **Place Type 5a: Rural Towns** where location efficiency factors, such as community design, are moderate to high and regional accessibility is low. Given the size of the project, it should include a robust Transportation Demand Management (TDM) Program to reduce VMT and greenhouse gas emissions. Such measures will be critical in order to facilitate efficient transportation access to and from the site and reduce transportation impacts associated with the project. The measures listed below will promote smart mobility and reduce regional VMT.

- Lower parking ratios;
- Subsidize transit passes on an ongoing basis;
- Project design to encourage walking, bicycling and convenient transit access;
- Bicycle repair station(s);
- Secured bicycle storage facilities;
- The establishment of subsidized shuttle, vanpool, or rideshare services between major regional housing, employment, and activity centers.
- Charging stations and designated parking spaces for electric vehicles;
- Parking cash out/parking pricing;
- Participation/Formation in/of a Transportation Management Association (TMA) in partnership with other developments in the area; and
- Aggressive trip reduction targets with Lead Agency monitoring and enforcement.

Transportation Demand Management (TDM) programs should be documented with annual monitoring reports by an onsite TDM coordinator to demonstrate effectiveness. If the project



does not achieve the VMT reduction goals, the reports should also include next steps to take in order to achieve those targets. Also, reducing parking supply can encourage active forms of transportation, reduce regional VMT, and lessen future transportation impacts on I-880 and other nearby State facilities. These smart growth approaches are consistent with the MTC's Regional Transportation Plan/SCS goals and would meet Caltrans Strategic Management Plan sustainability goals.

For additional TDM options, please refer to the Federal Highway Administration's *Integrating Demand Management into the Transportation Planning Process: A Desk Reference* (Chapter 8). The reference is available online at:

<http://www.ops.fhwa.dot.gov/publications/fhwahop12035/fhwahop12035.pdf>.

### ***Access Management***

In the documents provided to Caltrans, issues regarding access to the site via Carlos Street at SR 1 are noted. The major issues, as outlined in the memo: *Cypress Point Preliminary Traffic Assessment*, include sight distance, traffic speed, overlapping left turns, and pedestrian crossings. The high speeds and geometry of these intersections require interventions to address both traffic movement, and make the street safe for vulnerable users. Approaches that can achieve these goals will likely involve a realignment of the intersections at this project site, studies of which should include roundabouts and consolidating access points to SR 1, as well as efforts to reduce vehicle speed using design features. These features could include a hard median, hard shoulders and sidewalks, roundabouts, and the establishment of transition zones including gateway treatments delineating populated areas.

The Lead Agency should also provide a study of possible alternatives for intersection alignment at Carlos Street and SR 1; alternative alignments should include stop controlled, yield controlled, and signal controlled alignments, options altering or limiting turning movements at Carlos Street, and options that involve a natural reduction of speed using design features. Please provide a Synchro Software intersection analysis study for these alignments for our review and comments.

For future reviews, please provide a clear copy of the lane configuration illustrations of the project-proposed trail crossings at the Point Montara intersection for our review and comments.

### ***Transportation Impact Fees***

Please identify project-generated travel demand and estimate the costs of public transportation improvements necessitated by the proposed project; viable funding sources such as development and/or transportation impact fees should also be identified. We encourage a sufficient allocation of fair share contributions toward multi-modal and regional transit improvements to fully mitigate cumulative impacts to regional transportation. We also strongly support measures to increase sustainable mode shares, thereby reducing VMT.



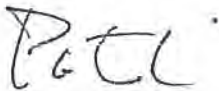
Mr. Mike Schaller, County of San Mateo  
September 25, 2017  
Page 4

***Encroachment Permit***

Please be advised that any work or traffic control that encroaches onto the state ROW requires an encroachment permit that is issued by the Department. To apply, a completed encroachment permit application, environmental documentation, and five (5) sets of plans clearly indicating state ROW must be submitted to: Office of Permits, California DOT, District 4, P.O. Box 23660, Oakland, CA 94623-0660. Traffic-related mitigation measures should be incorporated into the construction plans during the encroachment permit process. See the website link below for more information. <http://www.dot.ca.gov/hq/traffops/developserv/permits/>

Thank you again for including Caltrans in the environmental review process. Should you have any questions regarding this letter, please contact Jake Freedman at 510-286-5518 or [jake.freedman@dot.ca.gov](mailto:jake.freedman@dot.ca.gov).

Sincerely,



PATRICIA MAURICE  
District Branch Chief  
Local Development - Intergovernmental Review

c: State Clearinghouse

From: [Anne Green](#)  
To: [sanders@coastal.ca.gov](mailto:sanders@coastal.ca.gov); [Brownsey\\_Donne@Coastal](mailto:Brownsey_Donne@Coastal); [Aminzadeh\\_Sara@Coastal](mailto:Aminzadeh_Sara@Coastal); [Vargas\\_Mark@Coastal](mailto:Vargas_Mark@Coastal); [Sundberg\\_Ryan@Coastal](mailto:Sundberg_Ryan@Coastal); [Peskin\\_Aaron@Coastal](mailto:Peskin_Aaron@Coastal); [cgroom@coastal.ca.gov](mailto:cgroom@coastal.ca.gov); [cgroom@smcgov.org](mailto:cgroom@smcgov.org); [Bochco\\_Dayna@Coastal](mailto:Bochco_Dayna@Coastal); [Luevano\\_Mary@Coastal](mailto:Luevano_Mary@Coastal); [Ananda\\_Renee@Coastal](mailto:Ananda_Renee@Coastal); [abelak@midpen-housing.org](mailto:abelak@midpen-housing.org)  
Cc: [cgroom@smcgov.org](mailto:cgroom@smcgov.org); [dpine@smcgov.org](mailto:dpine@smcgov.org); [dhorsley@smcgov.org](mailto:dhorsley@smcgov.org); [wslocum@smcgov.org](mailto:wslocum@smcgov.org); [dcanepa@smcgov.org](mailto:dcanepa@smcgov.org)  
Subject: Proposed Mid-Pen Housing Development concerns  
Date: Tuesday, October 31, 2017 6:41:28 AM

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Dear Coastal Commission:

As a 35 year resident of the Coast who grew up blocks away from the proposed Mid-Pen housing site, I have some grave concerns about the development. The selected location is not viable or practical for the many reasons outlined below. We have heard that money is already being allocated to this unapproved project and that is very troubling.

Upon reviewing the letter from Ms. Ananda dated August 3, 2017 to Mr. Michael Schaller of the San Mateo County Planning and Building Department, it seems that the California Coastal Commission is committed, per your Mission Statement, to protecting and enhancing California's coast and ocean for present and future generations. And, that the Commission will exercise careful planning and regulation of environmentally-sustainable development, rigorous use of science, strong public participation, education, and effective intergovernmental coordination, when deciding on this project.

The "Major Development Pre-Application by Mid-Pen Housing (PRE2017-00032 (APN [037-022-070](#))) is not a viable project for so many reasons. The community has been attempting to communicate concerns in several meetings with Mid-Pen and with letters to the San Mateo Board of Supervisors about serious concerns regarding infrastructure, antiquated zoning; traffic congestion, egress and ingress into the property safely, environmental concerns of contamination on the property that will be disturbed and become airborne if disturbed.

Infrastructure concern: Failing Sewer System; water capacity and availability. There have been 101 overflows in the past 6 years and with ocean warming, resulting in more severe storm surges, the saturation limit to the sewer system results in overflows, which adversely affects our eco-system and costs the sewer customers higher rates due to State regulation fees. It will get nothing but worse over the years.

Antiquated zoning: The zoning for this property was completed in 1986 when there were plans for a multi-lane Hwy bypass, which did not materialize.

Traffic congestion: There is only one way in and one way out. The Hwy 1 corridor is already severely impacted by daily commuters to and from, but is exacerbated with weekend tourist influx onto this one lane highway basically land-locking residents. In addition, the jobs are not in this area of the coast, so the project residents would be traveling south to the 92 along with hundreds of other commuters to get to their "supposed" jobs in the service and agricultural areas, if indeed priority is even given to applicants with coastal jobs, when I've been told it is technically illegal to give

preferential treatment based on location. And, the traffic study paid for and performed by Mid-Peninsula Housing did not accurately measure the addition of close to 300-800 daily trips created by this project and took no consideration of the Big Wave project (additional 1500 daily car trips...) and its impact on the traffic. Highway 1 was designed as a pass-through highway. If the County and Mid-Peninsula Housing want to develop it to the point of saturation overload, then they should put the infrastructure in place first: Sewer, Water, 2 lane highway, sidewalks for our children and dog walkers. We are the poor step-sister of the County government....our infrastructure has been neglected, yet they want to build, build, build! This type of development, unless for senior living only should be built on the transit route not on the tourist route...this makes no sense. There are an estimated 2 million visitors to the coast every year with no road or infrastructure improvements to support the traffic.

Ingress and Egress: The developers are proposing entering and exiting the project from Sierra which runs directly into Carlos, which is an unmarked "country road" that requires one car to slow down or stop in order to let another car pass from the opposite direction. There is no talk of widening and lining this road, but rather Mid-Pen/County Planning suggests they could make the road one way to the highway after exiting off of Sierra. This will cause the project residents to return to the development through the current housing neighborhoods, which are already in many ways only narrow enough for one car at a time due to parking, and again, no sidewalks for children and dog walkers. Stetson Street would be unfairly burdened with the increased traffic flow and the fire station around the corner would also have to deal with a myriad of cars potentially blocking their way. Then Mid-Pen/County Planning opined that maybe they would use Sixteenth Avenue for the ingress and egress but Sixteenth Avenue is privately owned and maintained by the few home owners and ranchers that live back up there. This is just NOT a wise location for a project such as this one.

Environmental Concerns: There is an endless list of reasons why development, and we can literally say over-development based on all the other plans that have been approved on this small stretch of the coastal highway, should be vetoed by the Commission and Board.. The Resist Density group have provided a document to all elected officials, fully delineating all of the concerns. This group consist of hundreds of participants imploring our elected officials to use good common sense.

And finally, I am not opposed to affordable housing. However, I do expect our elected officials and commissioners to commit to their mission statements and representative government, and not just fill quotas even when they don't make sense. The coast already has substantial affordable housing in Pillar Point (Moss Beach) and substantial senior and affordable housing in Half Moon Bay, where the service and agricultural jobs exist. There are minimal jobs in Moss Beach, contrary to the Mid-Pen report of 1400 jobs with no source documents to support this number. -- To be quite frank, there are no jobs available in Moss Beach. Take a drive through this tiny town and see it for yourself.

Please take our concerns into consideration. Remember, just because you can do



something, doesn't mean you should. Plan for 20 years in the future not just for today. The impact on our coastal environment is already at a high level of risk.

Respectfully submitted,

Anne Green  
1562 Mizzen Lane  
Half Moon Bay, CA 94019

From: Cheryl Satterlee  
To: [sanders@coastal.ca.gov](mailto:sanders@coastal.ca.gov); [Brownsey\\_Donne@Coastal](mailto:Brownsey_Donne@Coastal); [Aminzadeh\\_Sara@Coastal](mailto:Aminzadeh_Sara@Coastal); [Vargas\\_Mark@Coastal](mailto:Vargas_Mark@Coastal); [Sundberg\\_Ryan@Coastal](mailto:Sundberg_Ryan@Coastal); [Peskin\\_Aaron@Coastal](mailto:Peskin_Aaron@Coastal); [cgroom@coastal.ca.gov](mailto:cgroom@coastal.ca.gov); [cgroom@smcgov.org](mailto:cgroom@smcgov.org); [Bochco\\_Dayna@Coastal](mailto:Bochco_Dayna@Coastal); [Luevano\\_Mary@Coastal](mailto:Luevano_Mary@Coastal); [Ananda\\_Renee@Coastal](mailto:Ananda_Renee@Coastal); [abelak@midpen-housing.org](mailto:abelak@midpen-housing.org); [cgroom@smcgov.org](mailto:cgroom@smcgov.org); [dpine@smcgov.org](mailto:dpine@smcgov.org); [dpine@smcgov.org](mailto:dpine@smcgov.org); [dhorsley@smcgov.org](mailto:dhorsley@smcgov.org); [wslocum@smcgov.org](mailto:wslocum@smcgov.org); [dcanepa@smcgov.org](mailto:dcanepa@smcgov.org)  
Subject: Stop Mid-Pen Housing project in Moss Beach  
Date: Wednesday, October 25, 2017 11:00:45 AM

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I want to strongly object to the proposed Mid-Pen Housing project in Moss Beach. The location is extremely inappropriate for building a project like this.

The infrastructure does not support a project of this size.

1. The roads are already overcrowded and in gridlock. This impacts the coastside residents daily. Commute to work and school is a nightmare. There one road in and out. What about emergencies? And weekends are even worse. Tourists already swarm the coastside each weekend, holidays and warm weather days.
2. The intersection at Hwy 1 and Carlos is already dangerous to navigate. Adding 150-200 extra cars to the mix will only make it impossible.
3. There is no reliable mass transit in the area. How are people going to get to their jobs and schools?
4. Schools are already full. How will the new students be assimilated into the school district?
5. This project does not give preference to local low income families.
6. There are few local jobs available. So the people living in this project will have to commute to larger job markets in order to find work.
7. We have a duty to protect the environment. The coastside is a treasure that can easily be destroyed by over saturation of people and cars. Can the current sewer system handle the increased demands?
8. This project should considered in the context of the other large project that are going forward already along our small stretch of coast. Four new hotels are being built. Big Wave is in the works.
9. The coast already has substantial affordable housing in Pillar Point (Moss Beach) and substantial senior and affordable housing in Half Moon Bay, where the service and agricultural jobs exist. There are minimal jobs in Moss Beach.

These are just a few of my concerns. I expect my elected officials to listen to the people they represent. THIS PROJECT SHOULD BE VETOED BY THE COMMISSION AND THE BOARD. IT DOESN'T MAKE SENSE.

From: [Harald](#)  
To: [sanders@coastal.ca.gov](mailto:sanders@coastal.ca.gov); [Brownsey\\_Donne@Coastal](mailto:Brownsey_Donne@Coastal); [Aminzadeh\\_Sara@Coastal](mailto:Aminzadeh_Sara@Coastal); [Vargas\\_Mark@Coastal](mailto:Vargas_Mark@Coastal); [Sundberg\\_Ryan@Coastal](mailto:Sundberg_Ryan@Coastal); [Peskin\\_Aaron@Coastal](mailto:Peskin_Aaron@Coastal); [cgroom@coastal.ca.gov](mailto:cgroom@coastal.ca.gov); [cgroom@smcgov.org](mailto:cgroom@smcgov.org); [Bochco\\_Dayna@Coastal](mailto:Bochco_Dayna@Coastal); [Luevano\\_Mary@Coastal](mailto:Luevano_Mary@Coastal)  
Cc: [Ananda\\_Renee@Coastal](mailto:Ananda_Renee@Coastal)  
Subject: Development Pre-Application by Mid-Pen Housing (PRE2017-00032 (APN 037-022-070) - Moss Beach CA  
Date: Tuesday, October 24, 2017 7:27:39 PM

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Dear Coastal Commission,

I'm forwarding an email that I wrote after MidPen completed their Pre Application workshop.

Thank you for your consideration.

Sincerely,

Harald Herrmann, Moss Beach, CA  
650 823 1904

----- Forwarded Message -----

**From:** Harald <hpsherrmann2002@yahoo.com>  
**To:** "mschaller@smcgov.org" <mschaller@smcgov.org>  
**Cc:** "renee.ananda@coastal.ca.gov" <renee.ananda@coastal.ca.gov>; "Dpine@smcgov.org" <Dpine@smcgov.org>; "Cgroom@smcgov.org" <Cgroom@smcgov.org>; "Dhorsley@smcgov.org" <Dhorsley@smcgov.org>; "Wslocum@smcgov.org" <Wslocum@smcgov.org>; "Dcanepa@smcgov.org" <Dcanepa@smcgov.org>  
**Sent:** Tuesday, September 26, 2017 3:37 PM  
**Subject:** Concerns - MidPen Housing Development in Moss Beach

Dear Mr Schaller,

I'm a resident of Moss Beach and want to share a couple of concerns. The following statements and comments express my own opinion but summarize concerns that were / are raised by many community members:

### **1. MidPen Pre App workshop and approach**

The workshop became hostile after the audience realized that we will have table discussions instead of a public forum. This came across as a "trick" to contain and limit information sharing across the audience. The third party facilitator missed to read the audience, insisted on her process and we lost 20 plus minutes debating the approach. In addition, the meeting started late.

MidPen's slides lacked clarity (how can they miss to note the community center), did not address issues that were raised since day one, contained wrong/ misleading information and lacked source information. For instance - preference for locals: this violates existing laws but MidPen continues to make that point. They stated that we have 1400 local jobs in El Granada / Princeton, MB, and Montara but miss to provide the source info. Jan Lindenthal, MidPen's vice president of real estate development is quoted in the SM Journal "Still, with 1,300 low-income jobs on the midcoast." 1400 vs 1300 with no source information? Where are the jobs? There is a low level of confidence in the quality of the minutes that will come out of the Pre App meeting as the note takers on the flip charts seemed to struggle to keep up with the discussion. Why was the workshop not recorded and why did the county not publish the date and time of the workshop to the impacted neighborhoods? The MCC published the date and



time. MidPen published workshop minutes in the past but they were summarized and missed many critical points that were made by the community and have not been addressed in the recent proposal.

MidPen tried to sell “pluses” where they “gave in” based on community input but it turned out that they are required by law to offer for instance a certain number of parking spots per unit or meet certain LCP requirements. MidPen did not share a timeline with the community but I understand that they did in a session with the CCC and County staff. Why is that? They claim to work with the impacted community and make it a transparent process.

## **2. KAI traffic impact assessment study from June 2017**

The study downplays the impact and states that the project will not significantly impact the adjacent Highway 1/ Carlos Street intersection and has “sufficient operational capacity.”

How can an additional couple of hundred daily car trips plus visitors to the community center have no impact? There is no walk-ability. How will an additional pedestrian crossing to Point Montara plus a couple of hundred cars accessing Highway 1 at a dangerous blind curve impact traffic flow on Highway 1?

### Calculation of increase in traffic volume

The KAI traffic assessment report states “The project is expected to add 37 trips during a typical weekday AM peak hour, 45 trips during a typical weekday PM peak hour...”

How does the math work? Why doesn't the report provide the underlying assumptions?

We are looking at 71 units with an average of 1-3 cars per unit translating to approx 100-200 cars plus x daily visitors to the new community center. 100-200 cars times 3-4 trips per day translate to approx. 300 – 800 daily car trips in and out of the development plus x daily visitors to the community center.

Now add 1500 daily car trips in and out of the Big Wave development and we have the perfect gridlock between El Granada and Montara. Plus an estimated 2 Mio annual visitors to the Coastsides...

### Blind Curve – risk of significant increase of car accidents

Signalization of the Highway 1 / Carlos intersection, or roundabout and a pedestrian crossing in close proximity will most likely result in a significant increase of accidents. Drivers from the South do not have visibility beyond the curve and stopped traffic or a pedestrians crossing on Highway 1 will add to the accident risk. A reduction of speed will most likely be ignored by many residents and visitors to the Coastsides .

### Cumulative effects

The KAI traffic study is looking only at the MidPen development and ignores surrounding measures that are planned by the County. Moss Beach is one of the access choke points for Big Wave and current plans show 2 additional traffic lights (Connect the Coastsides) in Moss Beach:

- Highway 1 / Cypress Ave intersection to channel a subset of 1500 daily car trips in and out of the Big Wave development
- Highway 1 / California intersection
- Plus whatever the decision is for the Highway 1 / Carlos intersection

How will the traffic flow on Highway 1 be impacted with all the additional signals (maybe one turns into a roundabout), increased traffic volume resulting out of the MidPen and Big Wave developments (ignoring the 2 new Hotels in Montara for now) and an estimated 2 Mio annual visitors to the Coastsides?

### Creation of Parallel Roads

What is the impact on neighborhood streets and Farallone View Elementary School (many kids walk and bike to school and many roads do not have sidewalks ) in Montara and Moss Beach as commuters and tourists try to bypass the gridlock on Highway 1 that will be created by the additional traffic measures and the MidPen and Big Wave developments?

The KAI study references outdated and incomplete traffic / transportation studies i.e. Connect the Coastside that do not reflect current Coastside traffic realities.

The outlined solutions do not address the concerns and will significantly increase the risk for accidents.

### **3. Failing Infrastructure: Sanitary Sewer Overflows (SSOs)**

Resist Density ([www.resistdensity.org](http://www.resistdensity.org)) just released information about an environmental disaster on the Coastside - a total of 101 sewage overflows (20 Category 1!!!) were recorded from Half Moon Bay to Montara from 2011 to mid 2017, according to public records. These findings raise significant questions as to whether the infrastructure can accommodate any more large development. The overflows are not isolated to specific locations and seem to indicate a systemic issue with the underlying infrastructure and capacity of the sewage systems.

How did a large brewery (as part of Big Wave and declared as “minor modification” instead of an office building) get approved knowing that large and problematic amounts of waste water are a byproduct of beer brewing? Does the underlying and failing infrastructure need to get fixed to stay in compliance with existing environmental laws before large developments can be added to the system?

### **4. Site Contamination**

Detailed maps of the facility and military usage are available. The types of military activities conducted on the site made use of many supplies and materials such as fuels, oils, tar, cleaning fluids, solvents, brake fluid, antifreeze, pesticides and building materials – many of which are known today to produce environmental toxins. In addition, there was at least one underground fuel tank, one or more power transformers and an incinerator. Burning waste in an incinerator is now known to produce toxins. The Navy’s standard operating procedure at the time would have been to dump, bury or burn waste and refuse, which included the above supplies and materials. Extensive research did not reveal any records that the site has been cleaned up.

I have 2 children and I’m very concerned about the potential release of toxins in the air and / or our drinking water as part of the housing development.

### **5. Safety and Disaster Preparedness**

Accessibility for medical emergencies and first responders is already constrained and will be further reduced by large- scale developments without making adjustments to the existing infrastructure. Evacuation routes in case of major disasters (i.e. Earthquake, Tsunami, Fire) won’t be accessible for Coastside residents and would strand the whole community and tourists. Many weekends are already a traffic nightmare for the Coastside.

Recent data (provided by a member of the Fireboard) show that we had 951 medical aid responses and 82 traffic accidents between January and July 2017. This data reflects 7 months of 2017 only and indicate a very concerning trend. What are the plans to ensure safety, accessibility and disaster preparedness for the Coastside? Or is that up to the community to figure it out after another large scale development is approved without the supporting infrastructure in place?

Thank you for your consideration.

Sincerely,

Harald Herrmann, Moss Beach



**From:** [Barbara Capers](#)  
**To:** [sanders@coastal.ca.gov](mailto:sanders@coastal.ca.gov); [Brownsey\\_Donne@Coastal](mailto:Brownsey_Donne@Coastal); [Aminzadeh\\_Sara@Coastal](mailto:Aminzadeh_Sara@Coastal); [Vargas\\_Mark@Coastal](mailto:Vargas_Mark@Coastal); [Sundberg\\_Ryan@Coastal](mailto:Sundberg_Ryan@Coastal); [Peskin\\_Aaron@Coastal](mailto:Peskin_Aaron@Coastal); [cgroom@coastal.ca.gov](mailto:cgroom@coastal.ca.gov); [cgroom@smcgov.org](mailto:cgroom@smcgov.org); [Bochco\\_Dayna@Coastal](mailto:Bochco_Dayna@Coastal); [Luevano\\_Mary@Coastal](mailto:Luevano_Mary@Coastal); [Ananda\\_Renee@Coastal](mailto:Ananda_Renee@Coastal); [abelak@midpen-housing.org](mailto:abelak@midpen-housing.org)  
**Subject:** Mid Pen proposal Moss Beach  
**Date:** Tuesday, October 24, 2017 9:50:58 PM

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Dear Costal Commission members:

I'm writing to you again to please consider the impact that the proposed 71 unit complex in Moss Beach will have on the community and environment. Is it true the environmental impact report is from the 80's? How can this even be considered?

And the recent traffic study was apparently done on a midweek day. As a resident of Moss Beach, I, like many others, rarely turn left onto Carlos Street when heading Southbound on Highway 1 due to the limited visibility of oncoming traffic. If it was a safer intersection I would take that route home from work much more. There has been at least 2 fatalities at this intersection in the past few years. It's a blind, narrow, and dangerous portion of Highway 1. Moss Beach doesn't have the infrastructure for this scale of a project. Our current sewage system can't handle the addition waste that this type of high density housing will bring. In addition, most of our streets don't have sidewalks and adding in 300 plus cars daily moving about will make walking along the surrounding streets even more dangerous. Many of our surrounding streets are more narrow than average in the county.

I believe that affordable housing is needed in all of the Bay Area! A more appropriate location for a project of this magnitude would be Half Moon Bay or on the northwest corner of Capistrano in El Granada (if at all) however our already strained 2 lane highway can't handle 300-800 more daily trips this project will generate! Who will be responsible for expanding Highway 1 to accommodate the extra traffic this scale of project will bring? Moss Beach already has affordable housing located at Pillar Ridge with 200 plus mobile homes. Single family residential housing is more appropriate for this area if anything is built at all. I understand the pressure that is being placed on our county to build affordable housing but our fragile coast should not be kept to the same standards as the rest of San Mateo county.

Thank you,

Barbara Capers, RN  
850 Stetson St,  
Moss Beach



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From: [Will Wen](#)  
To: [sanders@coastal.ca.gov](mailto:sanders@coastal.ca.gov)  
Subject: Concerns about The Mid-Pen Housing Development  
Date: Thursday, October 19, 2017 8:08:38 AM

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Dear Coastal Commission:

Upon reviewing the letter from Ms. Ananda dated August 3, 2017 to Mr. Michael Schaller of the San Mateo County Planning and Building Department, it seems that the California Coastal Commission is committed, per your Mission Statement, to protecting and enhancing California's coast and ocean for present and future generations. And, that the Commission will exercise careful planning and regulation of environmentally-sustainable development, rigorous use of science, strong public participation, education, and effective intergovernmental coordination, when deciding on this project. The "Major Development Pre-Application by Mid-Pen Housing (PRE2017-00032 (APN 037-022-070) is not a viable project for so many reasons. The community has been attempting to communicate concerns in several meetings with Mid-Pen and with letters to the San Mateo Board of Supervisors about serious concerns regarding infrastructure, antiquated zoning; traffic congestion, egress and ingress into the property safely, environmental concerns of contamination on the property that will be disturbed and become airborne if disturbed. Infrastructure concern: Failing Sewer System; water capacity and availability. There have been 101 overflows in the past 6 years and with ocean warming, resulting in more severe storm surges, the saturation limit to the sewer system results in overflows, which adversely affects our eco-system and costs the sewer customers higher rates due to State regulation fees. It will get nothing but worse over the years. Antiquated zoning: The zoning for this property was completed in 1986 when there were plans for a multi-lane Hwy bypass, which did not materialize. Traffic congestion: There is only one way in and one way out. The Hwy 1 corridor is already severely impacted by daily commuters to and from, but is exacerbated with weekend tourist influx onto this one lane highway basically land-locking residents. In addition, the jobs are not in this area of the coast, so the project residents would be traveling south to the 92 along with hundreds of other commuters to get to their "supposed" jobs in the service and agricultural areas, if indeed priority is even given to applicants with coastal jobs. And, the traffic study paid for and performed by Mid-Peninsula Housing did not accurately measure the addition of close to 300-800 daily trips created by this project and took no consideration of the Big Wave project (additional 1500 daily car trips... and its impact on the traffic. Highway 1 was designed as a pass-through highway. If the County and Mid-Peninsula Housing want to develop it to the point of saturation overload, then they should put the infrastructure in place first: Sewer, Water, 2 lane highway, sidewalks for our children and dog walkers. We are the poor step-sister of the County government....our infrastructure has been neglected, yet they want to build, build, build! This type of development, unless for senior living only should be built on the transit route not on the tourist route...this makes no sense. There are an estimated 2 million visitors to the coast every year with no road or infrastructure improvements to support the traffic. Ingress and Egress: The developers are proposing entering and exiting the project from Sierra which runs directly into Carlos, which is an unmarked "country road" that requires one car to slow down or stop in order to let another car pass from the opposite direction. There is no talk of widening and lining this road, but rather Mid-Pen/County Planning suggests they could make the road one way to the highway after exiting off of Sierra. This will cause the project residents to return to the development through the current housing neighborhoods, which are already in many ways only narrow enough for one car at a time due to parking, and again, no sidewalks for children and dog walkers. Then Mid-Pen/County Planning opined that maybe they would use Sixteenth Avenue for the ingress and egress but Sixteenth Avenue is privately owned and maintained by the few home owners and ranchers that live back up there. This is just NOT a wise location for a project such as this one. Environmental Concerns: There is an endless list of reasons why development, and we can literally say over-development based on all the other plans that have been approved on this small stretch of the

coastal highway, should be vetoed by the Commission and Board.. The Resist Density group have provided a document to all elected officials, fully delineating all of the concerns. This group consist of hundreds of participants imploring our elected officials to use good common sense. And finally, I am not opposed to affordable housing. However, I do expect our elected officials and commissioners to commit to their mission statements and representative government, and not just fill quotas even when they don't make sense. The coast already has substantial affordable housing in Pillar Point (Moss Beach) and substantial senior and affordable housing in Half Moon Bay, where the service and agricultural jobs exist. There are minimal jobs in Moss Beach, contrary to the Mid-Pen report of 1400 jobs with no source documents to support this number. Please take our concerns into consideration. Remember, just because you can do something, doesn't mean you should. Plan for 20 years in the future not just for today. The impact on our coastal environment is already at a high level of risk.

Respectfully submitted,  
Will at Montara



**From:** [Amy de Lorimier](#)  
**To:** [sanders@coastal.ca.gov](mailto:sanders@coastal.ca.gov); [Brownsey\\_Donne@Coastal](mailto:Brownsey_Donne@Coastal); [Aminzadeh\\_Sara@Coastal](mailto:Aminzadeh_Sara@Coastal); [Vargas\\_Mark@Coastal](mailto:Vargas_Mark@Coastal); [Sundberg\\_Ryan@Coastal](mailto:Sundberg_Ryan@Coastal); [Peskin\\_Aaron@Coastal](mailto:Peskin_Aaron@Coastal); [cgroom@coastal.ca.gov](mailto:cgroom@coastal.ca.gov); [cgroom@smcgov.org](mailto:cgroom@smcgov.org); [Bochco\\_Dayna@Coastal](mailto:Bochco_Dayna@Coastal); [Luevano\\_Mary@Coastal](mailto:Luevano_Mary@Coastal); [Ananda\\_Renee@Coastal](mailto:Ananda_Renee@Coastal); [abelak@midpen-housing.org](mailto:abelak@midpen-housing.org); [cgroom@smcgov.org](mailto:cgroom@smcgov.org); [dpine@smcgov.org](mailto:dpine@smcgov.org); [dpine@smcgov.org](mailto:dpine@smcgov.org); [dhorsley@smcgov.org](mailto:dhorsley@smcgov.org); [wslocum@smcgov.org](mailto:wslocum@smcgov.org); [dcanepa@smcgov.org](mailto:dcanepa@smcgov.org)  
**Subject:** No MidPen Housing in Moss Beach  
**Date:** Thursday, October 19, 2017 10:03:25 PM

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Dear Coastal Commission and Supervisors: The "Major Development Pre-Application by Mid-Pen Housing (PRE2017-00032 (APN 037-022-070) is not a viable project for so many reasons. The community has been attempting to communicate concerns in several meetings with Mid-Pen and with letters to the San Mateo Board of Supervisors about serious concerns regarding infrastructure, antiquated zoning; traffic congestion, egress and ingress into the property safely, environmental concerns of contamination on the property that will be disturbed and become airborne if disturbed.

Infrastructure concern: Failing Sewer System; water capacity and availability. There have been 101 overflows in the past 6 years and with ocean warming, resulting in more severe storm surges, the saturation limit to the sewer system results in overflows, which adversely affects our eco-system and costs the sewer customers higher rates due to State regulation fees. It will get nothing but worse over the years.

Antiquated zoning: The zoning for this property was completed in 1986 when there were plans for a multi-lane Hwy bypass, which did not materialize.

Traffic congestion: There is only one way in and one way out. The Hwy 1 corridor is already severely impacted by daily commuters to and from, but is exacerbated with weekend tourist influx onto this one lane highway basically land-locking residents. In addition, the jobs are not in this area of the coast, so the project residents would be traveling south to the 92 along with hundreds of other commuters to get to their "supposed" jobs in the service and agricultural areas, if indeed priority is even given to applicants with coastal jobs. And, the traffic study paid for and performed by Mid-Peninsula Housing did not accurately measure the addition of close to 300-800 daily trips created by this project and took no consideration of the Big Wave project (additional 1500 daily car trips... and its impact on the traffic. Highway 1 was designed as a pass-through highway. If the County and Mid-Peninsula Housing want to develop it to the point of saturation overload, then they should put the infrastructure in place first: Sewer, Water, 2 lane highway, sidewalks for our children and dog walkers. We are the poor step-sister of the County government....our infrastructure has been neglected, yet they want to build, build, build! This type of development, unless for senior living only should be built on the transit route not on the tourist route...this makes no sense. There are an estimated 2 million visitors to the coast every year with no road or infrastructure improvements to support the traffic.

Ingress and Egress: The developers are proposing entering and exiting the project from Sierra which runs directly into Carlos, which is an unmarked "country road" that requires one car to slow down or stop in order to let another car pass from the opposite direction. There is no talk of widening and lining this road, but rather Mid-Pen/County Planning suggests they could make the road one way to the highway after exiting off of Sierra. This will cause the project residents to return to the development through the current housing neighborhoods, which are already in many ways only narrow enough for one car at a time due to parking, and again, no sidewalks for children and dog walkers. Then Mid-Pen/County Planning opined that maybe they would use Sixteenth Avenue for the ingress and egress but Sixteenth Avenue is privately owned and maintained by the few home owners and ranchers that live back up there. This is just NOT a wise location for a project such as this one.

Environmental Concerns: There is an endless list of reasons why development, and we can literally say over-development based on all the other plans that have been approved on this small stretch of the coastal highway, should be vetoed by the Commission and Board.. The Resist Density group have provided a document to all elected officials, fully delineating all of the

concerns. This group consist of hundreds of participants imploring our elected officials to use good common sense.

And finally, I am not opposed to affordable housing. However, I do expect our elected officials and commissioners to commit to their mission statements and representative government, and not just fill quotas even when they don't make sense. The coast already has substantial affordable housing in Pillar Point (Moss Beach) and substantial senior and affordable housing in Half Moon Bay, where the service and agricultural jobs exist. There are minimal jobs in Moss Beach, contrary to the Mid-Pen report of 1400 jobs with no source documents to support this number.

Please take our concerns into consideration. Remember, just because you can do something, doesn't mean you should. Plan for 20 years in the future not just for today. The impact on our coastal environment is already at a high level of risk.

Respectfully submitted,

Dr Amy de Lorimier and Mr. Derek Meisenhelder

From: [Andrew Bielak](#)  
To: [Harald](#)  
Cc: [mschaller@smcgov.org](mailto:mschaller@smcgov.org); [Ananda\\_Renee@Coastal](mailto:Ananda_Renee@Coastal)  
Subject: RE: Cypress Point – Pre Application Workshop - September 20  
Date: Thursday, October 19, 2017 6:09:56 PM

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For your follow up question on preferences:

- Regarding the preference discussion – I think there is some confusion about what a preference means. We have been consistent in discussing this issue. Having a live-work preference *is* allowed by law, though there are certain requirements that must be followed to ensure that establishing a preference does not violate federal fair housing laws. What would not be allowed is a *restriction* for people who already work or live in the area. This is what I spelled out in the email that was read at the meeting. So while we can't restrict people from outside the area from applying to live at the development, we can establish a preference to have people already in the area placed higher up on the waiting list, so they would have an advantage in the lottery for selection of residents.

**HH - I don't understand what you are saying. How will MidPen select the first wave of tenants? First come first serve basis regardless of current residence and employment location?**

A preference systems sets up a process whereby applicants who meet the preference criteria would go to the top of the lottery during the selection of residents. So for example, under the preference we are proposing, if two families applied to live at the community, and one family lives/works on the coastside and one does not, the first family would be higher up on the list for the selection of residents. Assuming that both families demonstrated eligibility to live at the development during the interview/intake process, the family that meets the preference criteria would be selected first. So to answer your question, no, it's not first come first serve – it creates an advantage for people who live/work locally. In other situations where we've implemented a local live-work preference, we've seen cases where 100% of the households who move in live or work in the area, since there is often such a high local demand for housing.

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**From:** Harald [mailto:[hpsherrmann2002@yahoo.com](mailto:hpsherrmann2002@yahoo.com)]  
**Sent:** Tuesday, October 17, 2017 7:04 PM  
**To:** Andrew Bielak <[abielak@midpen-housing.org](mailto:abielak@midpen-housing.org)>  
**Cc:** [mschaller@smcgov.org](mailto:mschaller@smcgov.org); [renee.ananda@coastal.ca.gov](mailto:renee.ananda@coastal.ca.gov)  
**Subject:** Re: Cypress Point – Pre Application Workshop - September 20

Dear Mr Bielak,

Thank you for your response. Please see comments added below.

Thank you.

Sincerely,

Harald Herrmann



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**From:** Andrew Bielak <[abelak@midpen-housing.org](mailto:abelak@midpen-housing.org)>  
**To:** Harald <[hpsherrmann2002@yahoo.com](mailto:hpsherrmann2002@yahoo.com)>  
**Cc:** "[mschaller@smcgov.org](mailto:mschaller@smcgov.org)" <[mschaller@smcgov.org](mailto:mschaller@smcgov.org)>; "[renee.ananda@coastal.ca.gov](mailto:renee.ananda@coastal.ca.gov)" <[renee.ananda@coastal.ca.gov](mailto:renee.ananda@coastal.ca.gov)>  
**Sent:** Monday, October 16, 2017 1:34 PM  
**Subject:** RE: Cypress Point – Pre Application Workshop - September 20

Hi Harald,

Thanks for your note.

I wanted to respond to a few areas where you had specific questions or comments.

- The slide deck posted online is the same one that was shared with the community in the larger meeting. We would not want to share a different one since I realize that would be confusing, but I just double checked and confirmed the slides are the same.

**HH - I checked with a couple of neighbors who attended the workshop and they disagree with your statement about content and number of slides. They also recall only 7-8 slides but not 20.**

- I'm happy to share the source of data re: workers in the area. This information is pulled from the U.S. Census. You can find that information at the link [here](#). We put this information up on the project website last year after the open houses. There are age categories in the data, and while it doesn't tell you if someone is in high school (or college), you can see on page 5 in the link I sent that about 75% of the jobs are held by people who are 30 years or older.

**HH - This should be added as a footnote on the slide. A fraction of the 25% of the total number of jobs is occupied by part time students who work in the local restaurants and hotels.**

- Regarding the preference discussion – I think there is some confusion about what a preference means. We have been consistent in discussing this issue. Having a live-work preference *is* allowed by law, though there are certain requirements that must be followed to ensure that establishing a preference does not violate federal fair housing laws. What would not be allowed is a *restriction* for people who already work or live in the area. This is what I spelled out in the email that was read at the meeting. So while we can't restrict people from outside the area from applying to live at the development, we can establish a preference to have people already in the area placed higher up on the waiting list, so they would have an advantage in the lottery for selection of residents.

**HH - I don't understand what you are saying. How will MidPen select the first wave of tenants? First come first serve basis regardless of current residence and**

## employment location?

- Thanks for pointing out the Pillar Ridge info – your point is taken. Pillar Ridge is not income restricted (i.e. it's not reserved for people who need more affordable homes, so people who make any amount of money could live there), and there is no restrictions on home prices for any sales of homes there.
- I am aware of the Big Wave project, but that project is not near construction yet. Moreover, the Big Wave development is intended to serve a significantly different population than Cypress Point, since the homes at Big Wave would be for people with developmental disabilities.

**HH - As previously mentioned, Pillar Ridge is identified in a San Mateo Housing Ordinance as "affordable housing" and so is Big Wave. I suggest that MidPen is not trying to redefine affordable housing nor tries to narrow the definition to make a false claim.**

- You can follow-up with the County for inquiries related to minutes from the pre-application meeting.

Thanks,  
Andrew

---

**From:** Harald [<mailto:hpscherrmann2002@yahoo.com>]  
**Sent:** Friday, October 13, 2017 4:40 PM  
**To:** Andrew Bielak <[abielak@midpen-housing.org](mailto:abielak@midpen-housing.org)>  
**Cc:** [mschaller@smcgov.org](mailto:mschaller@smcgov.org); [renee.ananda@coastal.ca.gov](mailto:renee.ananda@coastal.ca.gov)  
**Subject:** Cypress Point – Pre Application Workshop - September 20

Dear Mr Bielak,

I just saw that the MCC posted a deck titled “Cypress Point – Pre Application Workshop” with a date stamp of September 20.

<http://static1.1.sqspcdn.com/static/f/1461275/27696908/1506036382550/2017-09-20-MidPen-pre-app-presentation.pdf?token=jU8zKCQF6M538XDxJXrH63QCLrw%3D>

I'm a resident of Moss Beach and want to share a couple of comments / observations:

- The posted deck is not the same deck that was shared with the community during the September 20 Pre Application workshop. You presented only a few slides (7 or 8 if I recall it right) and some slide content has been altered in the posted version.

- On page 3 in the deck you state: "1,364 jobs in Montara, Moss Beach and El Granada". During your presentation you presented a slide that stated "1,400 local jobs". Please can you provide the source info and supporting detail for that figure? The community is wondering where the jobs are. The same is true for the stated income figures. A lot of High School and Community College students work for minimum wage and part time in the local restaurants and hotels and should not part of your count. My daughter (High School) is one of them and she lives at home.

- During your presentation you showed a slide that stated MidPen will "prefer locals". I'm glad to see that you list it now on page 11 under "what we heard"... vs making the claim which is against the law.

- On page 3 in the deck you state: "Zero affordable housing anywhere in Midcoast region". This statement is misleading. The BoS approved Big Wave which includes affordable housing for approx. 50 developmentally disabled adults. See link below for additional context.

<http://blogs.berkeley.edu/2014/06/17/hostages-strapped-to-the-tank-coastal-commission-stories-lesson-2/>

In addition, Pillar Ridge is part of Moss Beach and is classified as affordable housing according to the following publication. See link below

<https://www.gsmol.org/uncategorized/county-bans-mobile-home-park-closures-and-conversions/>

Pillar Ridge consists out of 200 plus manufactured homes and has about 1,000 residents. I just checked and it seems that we have approx. 3,100 residents in Moss Beach.

- Page 11 misses many concerns (and solutions) that were raised by the community since day 1. See links below for a summary provided by Resist Density.

<http://static1.1.sqspcdn.com/static/f/1461275/27703175/1506611069043/2017-09-26-MidPen-ResistD-comments.pdf?token=0Y9RY7DQTiKSRMZ%2BVWHI1jmPkJo%3D>  
[https://docs.wixstatic.com/ugd/1b818a\\_3c61e829fa13481cb5a0706ebc991b36.pdf](https://docs.wixstatic.com/ugd/1b818a_3c61e829fa13481cb5a0706ebc991b36.pdf)

In summary - the posted deck should not be labeled as "Cypress Point – Pre Application Workshop" with a Sep 20 date stamp as this was not the content that was shared with the community during the workshop. In addition, some content seems to be misleading, is incomplete and requires clarification. I'm looking forward to the Pre Application workshop minutes.

Thank you.

Sincerely,

Harald Herrmann  
Moss Beach





**From:** [Audrey Patchett](#)  
**To:** [sanders@coastal.ca.gov](mailto:sanders@coastal.ca.gov); [Brownsey\\_Donne@Coastal](mailto:Brownsey_Donne@Coastal); [Aminzadeh\\_Sara@Coastal](mailto:Aminzadeh_Sara@Coastal); [Vargas\\_Mark@Coastal](mailto:Vargas_Mark@Coastal); [Sundberg\\_Ryan@Coastal](mailto:Sundberg_Ryan@Coastal); [Peskin\\_Aaron@Coastal](mailto:Peskin_Aaron@Coastal); [cgroom@coastal.ca.gov](mailto:cgroom@coastal.ca.gov); [cgroom@smcgov.org](mailto:cgroom@smcgov.org); [Bochco\\_Dayna@Coastal](mailto:Bochco_Dayna@Coastal); [Luevano\\_Mary@Coastal](mailto:Luevano_Mary@Coastal); [Ananda\\_Renee@Coastal](mailto:Ananda_Renee@Coastal); [abelak@midpen-housing.org](mailto:abelak@midpen-housing.org); [cgroom@smcgov.org](mailto:cgroom@smcgov.org); [dpine@smcgov.org](mailto:dpine@smcgov.org); [dpine@smcgov.org](mailto:dpine@smcgov.org); [dhorsley@smcgov.org](mailto:dhorsley@smcgov.org); [wslocum@smcgov.org](mailto:wslocum@smcgov.org); [dcanepa@smcgov.org](mailto:dcanepa@smcgov.org)  
**Subject:** No High Density Housing in Moss Beach  
**Date:** Wednesday, October 18, 2017 8:24:18 PM

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Dear Coastal Commission: Upon reviewing the letter from Ms. Ananda dated August 3, 2017 to Mr. Michael Schaller of the San Mateo County Planning and Building Department, it seems that the California Coastal Commission is committed, per your Mission Statement, to protecting and enhancing California's coast and ocean for present and future generations. And, that the Commission will exercise careful planning and regulation of environmentally-sustainable development, rigorous use of science, strong public participation, education, and effective intergovernmental coordination, when deciding on this project. The "Major Development Pre-Application by Mid-Pen Housing (PRE2017-00032 (APN 037-022-070) is not a viable project for so many reasons. The community has been attempting to communicate concerns in several meetings with Mid-Pen and with letters to the San Mateo Board of Supervisors about serious concerns regarding infrastructure, antiquated zoning; traffic congestion, egress and ingress into the property safely, environmental concerns of contamination on the property that will be disturbed and become airborne if disturbed. Infrastructure concern: Failing Sewer System; water capacity and availability. There have been 101 overflows in the past 6 years and with ocean warming, resulting in more severe storm surges, the saturation limit to the sewer system results in overflows, which adversely affects our eco-system and costs the sewer customers higher rates due to State regulation fees. It will get nothing but worse over the years. Antiquated zoning: The zoning for this property was completed in 1986 when there were plans for a multi-lane Hwy bypass, which did not materialize. Traffic congestion: There is only one way in and one way out. The Hwy 1 corridor is already severely impacted by daily commuters to and from, but is exacerbated with weekend tourist influx onto this one lane highway basically land-locking residents. In addition, the jobs are not in this area of the coast, so the project residents would be traveling south to the 92 along with hundreds of other commuters to get to their "supposed" jobs in the service and agricultural areas, if indeed priority is even given to applicants with coastal jobs. And, the traffic study paid for and performed by Mid-Peninsula Housing did not accurately measure the addition of close to 300-800 daily trips created by this project and took no consideration of the Big Wave project (additional 1500 daily car trips... and its impact on the traffic. Highway 1 was designed as a pass-through highway. If the County and Mid-Peninsula Housing want to develop it to the point of saturation overload, then they should put the infrastructure in place first: Sewer, Water, 2 lane highway, sidewalks for our children and dog walkers. We are the poor step-sister of the County government....our infrastructure has been neglected, yet they want to build, build, build! This type of development, unless for senior living only should be built on the transit route not on the tourist route...this makes no sense. There are an estimated 2 million visitors to the coast every year with no road or infrastructure improvements to support the traffic. **Ingress and Egress:** The developers are proposing entering and exiting the project from Sierra which runs directly into Carlos, which is an unmarked "country road" that requires one car to slow down or stop in order to let another car pass from the opposite direction. There is no talk of widening and lining this road, but rather Mid-Pen/County Planning suggests they could make the road one way to the highway after exiting off of Sierra. This will cause the project residents to return to the development through the current housing neighborhoods, which are already in many ways only narrow enough for one car at a time due to parking, and again, no sidewalks for children and dog walkers. Then Mid-Pen/County Planning opined that maybe they would use Sixteenth Avenue for the ingress and egress but Sixteenth Avenue is privately owned and maintained by the few home owners and ranchers that live back up there. This is just NOT a wise location for a project such as this one. **Environmental**

**Concerns:** There is an endless list of reasons why development, and we can literally say over-development based on all the other plans that have been approved on this small stretch of the coastal highway, should be vetoed by the Commission and Board.. The Resist Density group have provided a document to all elected officials, fully delineating all of the concerns. This group consist of hundreds of participants imploring our elected officials to use good common sense. And finally, I am not opposed to affordable housing. However, I do expect our elected officials and commissioners to commit to their mission statements and representative government, and not just fill quotas even when they don't make sense. The coast already has substantial affordable housing in Pillar Point (Moss Beach) and substantial senior and affordable housing in Half Moon Bay, where the service and agricultural jobs exist. There are minimal jobs in Moss Beach, contrary to the Mid-Pen report of 1400 jobs with no source documents to support this number. **Please take home owning, voting, tax payer's concerns into consideration.** Remember, just because you can do something, doesn't mean you should. Plan for 20 years in the future not just for today. The impact on our coastal environment is already at a high level of risk. Respectfully submitted,



**From:** [Sylvie Corkins](#)  
**To:** [sanders@coastal.ca.gov](mailto:sanders@coastal.ca.gov); [Brownsey\\_Donne@Coastal](mailto:Brownsey_Donne@Coastal); [Aminzadeh\\_Sara@Coastal](mailto:Aminzadeh_Sara@Coastal); [Vargas\\_Mark@Coastal](mailto:Vargas_Mark@Coastal); [Sundberg\\_Ryan@Coastal](mailto:Sundberg_Ryan@Coastal); [Peskin\\_Aaron@Coastal](mailto:Peskin_Aaron@Coastal); [cgroom@coastal.ca.gov](mailto:cgroom@coastal.ca.gov); [cgroom@smcgov.org](mailto:cgroom@smcgov.org); [Bochco\\_Dayna@Coastal](mailto:Bochco_Dayna@Coastal); [Luevano\\_Mary@Coastal](mailto:Luevano_Mary@Coastal); [Ananda\\_Renee@Coastal](mailto:Ananda_Renee@Coastal); [abelak@midpen-housing.org](mailto:abelak@midpen-housing.org); [cgroom@smcgov.org](mailto:cgroom@smcgov.org); [dpine@smcgov.org](mailto:dpine@smcgov.org); [dpine@smcgov.org](mailto:dpine@smcgov.org); [dhorsley@smcgov.org](mailto:dhorsley@smcgov.org); [wslocum@smcgov.org](mailto:wslocum@smcgov.org); [dcanepe@smcgov.org](mailto:dcanepe@smcgov.org)  
**Subject:** mid pen low cost housing project  
**Date:** Wednesday, October 18, 2017 6:01:49 PM

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Coastal Commission:

The community has been attempting to communicate concerns in several meetings with Mid-Pen and with letters to the San Mateo Board of Supervisors about serious concerns regarding infrastructure, antiquated zoning; traffic congestion, egress and ingress into the property safely, environmental concerns of contamination on the property that will be disturbed and become airborne if disturbed. Infrastructure concern: Failing Sewer System; water capacity and availability. There have been 101 overflows in the past 6 years and with ocean warming, resulting in more severe storm surges, the saturation limit to the sewer system results in overflows, which adversely affects our eco-system and costs the sewer customers higher rates due to State regulation fees.

The zoning for this property was completed in 1986 when there were plans for a multi-lane Hwy bypass, which did not materialize. Traffic congestion: There is only one way in and one way out. The Hwy 1 corridor is already severely impacted by daily commuters to and from, but is exacerbated with weekend tourist influx onto this one lane highway basically land-locking residents. In addition, the jobs are not in this area of the coast, so the project residents would be traveling south to the 92 along with hundreds of other commuters to get to their "supposed" jobs in the service and agricultural areas, if indeed priority is even given to applicants with coastal jobs. And, the traffic study paid for and performed by Mid-Peninsula Housing did not accurately measure the addition of close to 300-800 daily trips created by this project and took no consideration of the Big Wave project (additional 1500 daily car trips... and its impact on the traffic. Highway 1 was designed as a pass-through highway. If the County and Mid-Peninsula Housing want to develop it to the point of saturation overload, then they should put the infrastructure in place first: Sewer, Water, 2 lane highway, sidewalks for our children and dog walkers. Additional concerns are the lack of fire department to support even the few lightning strikes we had recently. Not only were we unable to reach fire department by phone we also went to Montara looking for help with the fire spreading on hill due to lightening striking a tree, ( fire department was unmanned and the emergency phone was not working). We worked with neighbors and hoses to contain the fire, when fire department did arrive, they told us to continue and they would be back to check as there were other urgent fires.

This type of development, unless for senior living only should be built on the transit route not on the tourist route...this makes no sense. There are an estimated 2 million visitors to the coast every year with no road or infrastructure improvements to support the traffic. Ingress and Egress: The developers are proposing entering and exiting the project from Sierra which runs directly into Carlos, which is an unmarked "country road" that requires one car to slow down or stop in order to let another car pass from the opposite direction. There is no talk of widening and lining this road, but rather Mid-Pen/County Planning suggests they could make the road one way to the highway after exiting off of Sierra. This will cause the project residents to return to the development through the current housing neighborhoods, which are already in many ways only narrow enough for one car at a time due to parking, and again, no sidewalks for children and dog walkers.

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From: [Gary Naman](#)  
To: [sanders@coastal.ca.gov](mailto:sanders@coastal.ca.gov); [Brownsey\\_Donne@Coastal](mailto:Brownsey_Donne@Coastal); [Aminzadeh\\_Sara@Coastal](mailto:Aminzadeh_Sara@Coastal); [Vargas\\_Mark@Coastal](mailto:Vargas_Mark@Coastal); [Sundberg\\_Ryan@Coastal](mailto:Sundberg_Ryan@Coastal); [Peskin\\_Aaron@Coastal](mailto:Peskin_Aaron@Coastal); [cgroom@coastal.ca.gov](mailto:cgroom@coastal.ca.gov); [cgroom@smcgov.org](mailto:cgroom@smcgov.org); [Bochco\\_Dayna@Coastal](mailto:Bochco_Dayna@Coastal); [Luevano\\_Mary@Coastal](mailto:Luevano_Mary@Coastal); [Ananda\\_Renee@Coastal](mailto:Ananda_Renee@Coastal); [abelak@midpen-housing.org](mailto:abelak@midpen-housing.org); [dpine@smcgov.org](mailto:dpine@smcgov.org); [dhorsley@smcgov.org](mailto:dhorsley@smcgov.org); [wslocum@smcgov.org](mailto:wslocum@smcgov.org); [dcanepa@smcgov.org](mailto:dcanepa@smcgov.org)  
Subject: MIDPEN HOUSING IN MOSS BEACH  
Date: Wednesday, October 18, 2017 10:07:11 AM

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And finally, I am not opposed to affordable housing. However, I do expect our elected officials and commissioners to commit to their mission statements and representative government, and not just fill quotas even when they don't make sense. The coast already has substantial affordable housing in Pillar Point (Moss Beach) and substantial senior and affordable housing in Half Moon Bay, where the service and agricultural jobs exist. There are minimal jobs in Moss Beach, contrary to the Mid-Pen report of 1400 jobs with no source documents to support this number.

Please take our concerns into consideration. Remember, just because you can do something, doesn't mean you should. Plan for 20 years in the future not just for today. The impact on our coastal environment is already at a high level of risk. Respectfully submitted,

Gary A. and Janis L. Naman  
2120 Vallemar St  
Moss Beach

--

**THOUGHTS FOR THE DAY:**

In the 60's, people took LSD to make the world weird. Now the world is weird and people take Prozac to make it normal. *No Known Attribution*

Happiness is something we choose in advance. Whether or not we like a room should not depend on the furniture or décor -- rather it should depend on how we decide to see it. *The Wise Old Man*

You cannot hang out with negative people and expect to live a positive life. *Anon*

Have a\* ^^^)  
(.^.^ (^.^.^\* ^^^) ^.^.\*^^)  
(.^.^ (^.^.^\* Wonderful day!



**From:** [Theresa McLaughlin](#)  
**To:** [sanders@coastal.ca.gov](mailto:sanders@coastal.ca.gov); [Brownsey\\_Donne@Coastal](mailto:Brownsey_Donne@Coastal); [Aminzadeh\\_Sara@Coastal](mailto:Aminzadeh_Sara@Coastal); [Vargas\\_Mark@Coastal](mailto:Vargas_Mark@Coastal); [Sundberg\\_Ryan@Coastal](mailto:Sundberg_Ryan@Coastal); [Peskin\\_Aaron@Coastal](mailto:Peskin_Aaron@Coastal); [cgroom@coastal.ca.gov](mailto:cgroom@coastal.ca.gov); [Bochco\\_Dayna@Coastal](mailto:Bochco_Dayna@Coastal); [Luevano\\_Mary@Coastal](mailto:Luevano_Mary@Coastal); [Ananda\\_Renee@Coastal](mailto:Ananda_Renee@Coastal); [Andrew\\_Bielak](mailto:Andrew_Bielak); [supervisorscgroom@smcgov.org](mailto:supervisorscgroom@smcgov.org); [dpine@smcgov.org](mailto:dpine@smcgov.org); [dhorsley@smcgov.org](mailto:dhorsley@smcgov.org); [wslocum@smcgov.org](mailto:wslocum@smcgov.org); [dcanepa@smcgov.org](mailto:dcanepa@smcgov.org)  
**Subject:** Concerns about proposed MidPen development in Moss Beach  
**Date:** Tuesday, October 17, 2017 4:59:40 AM

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Dear members of the Coastal Commission and San Mateo County Board of Supervisors:

I live in El Granada and am building a home on Stetson Street in Moss Beach. I attended the planning meeting with MidPen on Sep 20 and two of the previous workshops, and I would like to share my concerns about the Cypress Point proposal:

1) **Blind curve:** Significant investment will be needed to make the intersection at Carlos St and Hwy 1 safe. MidPen's preliminary traffic report states that there is no room for a deceleration lane for those making a right turn from Highway 1 onto Carlos. Drivers who yield to bicyclists/pedestrians or slow as southbound cars turn left will be at risk of being rear-ended. A traffic light or roundabout will be needed to help cars turn left from Carlos onto Hwy 1. Current residents avoid turning left from this intersection because of the limited sight distance. The traffic report states that it *might* be possible to cut the hillside back to improve visibility to the south, but feasibility, effectiveness, and CalTrans funding for this are not established.

2) **Across from the sewer plant / no accessible trails / no room for bicycle lanes / no room to add lanes to Hwy 1 / erosion impacting Hwy 1 in this location:** Carlos Street is an exceptionally bad spot to pour development resources. South of Miramar/El Granada Hwy 1 is further from the ocean and there is room for bicycle lanes and even to widen Hwy 1 to four lanes if necessary. North of Miramar/El Granada the trails and areas of sandy beach are limited, the bluffs are higher and experiencing significant erosion, and it will be prohibitively expensive or impossible to add bicycle lanes or to widen Hwy 1.

- Crossing Highway 1 at Carlos takes you to the sewer plant with no trails up or down the coast and *no potential for coastal trails because the bluff has already eroded to the private property lines*. You also reach the Point Montara lighthouse which has no space or public restrooms; access to the small beach is down a steep hill and limited to 1 hour.
- One mile north of Carlos is Montara State Beach, which due to the steep cliffs has no facilities accessible to the disabled.
- One mile south of Carlos is the Fitzgerald Marine Reserve where beach access is limited to 1 hour, beach activities are limited to protect wildlife, and the steep cliffs limit access for the disabled. The FMR is beautiful, but for traditional beach activities many Cypress Point residents will need to drive south.
- Three miles south, in El Granada and Half Moon Bay you can cross Highway 1 and find yourself on a well maintained, paved trail that lets differently-abled people walk/run/bike/have a picnic and enjoy the beautiful Pacific Ocean.
- South of Miramar/El Granada short stairways take you to a five mile ribbon of sandy beach that supports a wide range of activities including fishing, swimming, walking, etc.

Last winter the southbound shoulder of Hwy 1 was damaged by erosion at Surfer's Beach in El Granada and just north of Carlos Street in Montara, forcing bicycles into the travel lanes of Hwy 1. Between El Granada and Pacifica there are many areas where there is no shoulder, no bicycle paths, no room to build them, and no room to add lanes to Hwy 1.

3) **Car traffic on narrow residential streets:** I am concerned that automobile traffic from the new homes will divert to Carlos and Stetson Streets. Right now I see many of my neighbors out walking their dogs, riding bikes, or playing basketball. This won't be possible if 20% of the town starts driving down these narrow roads. Stetson and Carlos are the natural routes for pedestrians from the new development to get to the market, post office, Moss Beach Park, library BookMobile, and to cross highway 1 at California to get to the Latter Day Saints Church or the Fitzgerald Marine Reserve. Non-MidPen pedestrians would take Carlos and Stetson to access the open space required as part of the development. Carlos and Stetson will become the most highly trafficked automobile, pedestrian and bicycle routes in Moss Beach, and the roads are not wide enough to accommodate the increased volume of traffic.

4) **Segregated nature of the complex:** MidPen is creating a housing complex with different governance than the rest of Moss Beach. The city-within-a-city will have after school programs, exercise facilities, and a community meeting room - essentially creating a non-centrally located community center that excludes 75% of the Moss Beach population. Perhaps they will allow non-MidPen residents access to these facilities for a fee, but non-MidPen residents will be second class citizens, and wider community utilization could make traffic and parking problems worse.



5) **Parking:** Many Moss Beach residents have no off-street parking or work trucks that don't fit in the garage/driveway. With room for one or two cars in front of each house, increasing automobile density has the potential to generate a lot of conflict. I have seen cars at MidPen's Moonridge complex overflowing onto Miramontes Point Road - Moss Beach does not have a similar wide empty street that can absorb extra cars.

6) **5 miles from the nearest supermarket.** Most residents in Moss Beach will need cars because the location is distant from transit hubs and commerce centers. The bus comes once an hour and stops running at 8 in the evening.

7) **Three planned developments, no urban planning?** In addition to MidPen, there is another parcel reserved for affordable housing near Seton Hospital across from the planned Big Wave project. We have three large developments on the north and south ends of Moss Beach that seem to be happening in parallel isolation with separate entrances to Hwy 1.

Locating a medium density housing complex at the north end of Moss Beach is not consistent with Smart Growth principles. Due to the potential for continued erosion as sea levels rise, higher density development should be located in areas south of Miramar/El Granada (and east of Hwy 1) where there is a buffer between Hwy 1 and the ocean and a wider range of transportation and recreation options.

Thank you and best regards,  
Theresa

Theresa McLaughlin  
570 Coronado St #1403  
El Granada, CA 94018



Sensible planning and protection  
for the San Mateo County Midcoast

## Key Concerns for MidPen Pre-App Meeting 9/20/17

Proposed Development of Parcel APN 037-022-070 in Moss Beach  
(across from Point Montara Lighthouse)

MidPen's proposed 71-unit housing development discussion has two tracks — the critical housing shortage, which we all recognize, and the inappropriate location for such a large development. Resist Density's concerns focus on the inadequate infrastructure and health / safety dangers of this project.

### **Increased Traffic**

There are no alternative routes on the coast – there is only one road in, through and out. The Midcoast section of HWY 1 is a critical daily travel corridor, and it is limited to one lane in each direction along the scenic portion of Montara. Adding a large housing development to the Midcoast will only compound increased traffic that has occurred since the Lantos tunnel opened in 2013. MidPen has not provided any traffic mitigation solutions for the hundreds of additional cars of this development. Furthermore, "Connect the Coastside" Transportation Management Plan proposes the addition of multiple crosswalks and at least 2 traffic lights in Moss Beach without any recommendation to improve public transit. Questions of disaster preparedness and emergencies requiring first-responder access are coming to head as traffic worsens.

### **MidPen Traffic Assessment is Lacking**

As part of MidPen's Pre-Application, it has released an initial traffic assessment by KAI consultants. The whole premise of KAI's findings that the MidPen project will not significantly impact the HWY 1 / Carlos Street intersection is flawed. We question KAI's numbers of projected car trips the MidPen development will create. How did they arrive at these numbers? Further, it does not take into account the cumulative impact the MidPen project will have when combined with the Big Wave large-scale commercial project, 2 proposed hotels, infill building and second units, and increasing coastal tourism traffic.

### **No Solution to Dangerous Blind Curve**

The proposed MidPen Housing development is located at a dangerous blind curve on Highway 1. KAI field measurements at the HWY 1/Carlos Street intersection found that the sight distance to the South was 305 feet, or about half of Caltrans' required corner sight distance of 605. By KAI's own assessment, grading and/or tree removal will be insufficient to meet the required sight distance due to the vertical dip.

### **All 3 Possible Intersection Controls are Unacceptable**

In addition to the insufficient sight distance, KAI's traffic study recognizes that there are overlapping and conflicting left turns using the same lane for drivers entering Carlos and drivers entering Pt Montara Lighthouse. The pedestrian crossing of HWY 1 is also unsafe. Three intersection controls are evaluated but all have drawbacks and none solve the sight distance problem for drivers or pedestrians:

- 1) Signal/Traffic light control – evaluated, and not warranted
- 2) Roundabout - does not solve the sight distance problem and may be too expensive
- 3) Stop Control - essentially what already exists except add a no-left-turn off Carlos.

### **Roads Safety - Concerns for Children and Pedestrians**

There is no safe way to make a left (southbound) turn off Carlos onto HWY1. The KAI study fails to mention the impact that hundreds of additional cars will have on neighborhood roads, and doesn't note that these roads are substandard - too narrow and lacking sidewalks - posing a safety risk for pedestrians and children

who will have to share the same roads with impatient drivers. Even the proposal to make Carlos one-way southbound doesn't assess traffic impacts to neighborhood streets or the Etheldore intersection.

### **Population Increase of 26%**

The MidPen housing proposal is for 71 units totaling 144 bedrooms. At maximum occupancy, there would be 359 residents. And this doesn't include guests or visitors to the community center. This development would increase the population of Moss Beach East of HW 1, where this will be built, by 26%. This population increase will take place in one location all at once, as opposed to several decades of gradual development.

### **Failing Sewer System – SSOs**

The sewer infrastructure on the coast is failing. There have been approximately 101 Sanitary Sewage Overflows (SSOs) over the last 5.5 years, many of which are a result of failed or broken pipes and root intrusion. These overflows endanger public health and the environment. This failing sewer system must be addressed before additional development is approved. What is the assessment of bringing a 71-unit housing development online all at once?

### **Water Capacity**

Montara Water and Sanitary District states it has plenty of water for this project. In addition to water quantity, there is concern for water allotment, pressure and distribution. Is the water distribution system capable to handle the added burden of an emergency such as a large fire? Is the water infrastructure capable to handle this pace of growth and emergencies? Has this been assessed?

### **Potential for Environmental damage and the Critical Coastal Area (CCA)**

The 11-acre property is located approximately 200 feet from the Fitzgerald Marine Reserve, an identified CCA. It deserves special protection due to its close proximity to Montara Creek that runs directly into the Fitzgerald Marine Reserve. The scale of the MidPen development would cause substantial disruption and removal of earth, trees and structures with possible toxic hazards. Comprehensive testing must be made throughout the site to check for contamination and toxins such as asbestos, lead, solvents and other chemical compounds that were commonly used at military facilities like these. The site is located on a hill, so any runoff would head directly toward the creek and ocean below.

### **Cumulative Effects**

The impacts of a large housing development, when combined with other nearby developments such as the approved Big Wave project in Moss Beach (estimated 1500 car trips per day), two proposed hotels in Montara, and the annual infill of new homes, second units, and buildings, will further stress the environment and the public utility infrastructure of this coastal community. With a large brewing company proposed for Big Wave In Moss Beach, what is the projected cumulative impact of these projects on Hwy 1, traffic, the environment and the infrastructure?

### **Inappropriate / Isolated Location**

Moss Beach is isolated, located seven miles in either direction from the nearest town centers of Half Moon Bay and Pacifica. The Sierra Club Loma Prieta chapter has come out against the MidPen project stating: *"there could hardly be a much worse location for affordable housing in the urbanized Mid-Coast."* This potential development would have a significantly high Vehicle Miles Traveled (VMT) designation, limited walkability, and offers no meaningful public transportation. Lack of access to groceries, jobs, schools, pharmacies, and community-oriented services will make residents dependent on driving, which is a financial burden for affordable housing residents, plus increases traffic problems.

### **Antiquated Zoning**

The outdated zoning for this parcel was completed in 1986 based on plans for a multi-lane Hwy 1 bypass around Devil's Slide, and additional infrastructure that never was, nor will be, carried out due to legislation and the purchase of Rancho Corral de Tierra by POST. This 11-acre parcel should have been rezoned to reflect the revised situation and population projections, but was not. We advocate for a rezoning of this property to more accurately reflect infrastructure constraints and current realities.

**From:** [MAUREEN LENNON](#)  
**To:** [sanders@coastal.ca.gov](mailto:sanders@coastal.ca.gov); [donnebrownsey@coastal.ca.gov](mailto:donnebrownsey@coastal.ca.gov); [Aminzadeh.Sara@Coastal](mailto:Aminzadeh.Sara@Coastal); [Vargas.Mark@Coastal](mailto:Vargas.Mark@Coastal); [Sundberg.Ryan@Coastal](mailto:Sundberg.Ryan@Coastal); [Peskin.Aaron@Coastal](mailto:Peskin.Aaron@Coastal); [cgroom@coastal.ca.gov](mailto:cgroom@coastal.ca.gov); [cgroom@smcgov.org](mailto:cgroom@smcgov.org); [Bochco.Dayna@Coastal](mailto:Bochco.Dayna@Coastal); [Luevano.Mary@Coastal](mailto:Luevano.Mary@Coastal); [Ananda.Renee@Coastal](mailto:Ananda.Renee@Coastal); [abelak@midpen-housing.org](mailto:abelak@midpen-housing.org); [dpine@smcgov.org](mailto:dpine@smcgov.org); [dhorsley@smcgov.org](mailto:dhorsley@smcgov.org); [wslocum@smcgov.org](mailto:wslocum@smcgov.org); [dcanepa@smcgov.org](mailto:dcanepa@smcgov.org)  
**Cc:** [dpine@smcgov.org](mailto:dpine@smcgov.org); [dhorsley@smcgov.org](mailto:dhorsley@smcgov.org); [wslocum@smcgov.org](mailto:wslocum@smcgov.org); [dcanepa@smcgov.org](mailto:dcanepa@smcgov.org)  
**Subject:** Re: Mid-Peninsula Housing - Moss Beach Project Protest  
**Date:** Sunday, October 15, 2017 6:32:57 PM  
**Attachments:** [1b818a\\_5fe44d1776474662b43f0e615c70a375.pdf](#)

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On Sunday, October 15, 2017 6:31 PM, MAUREEN LENNON <[mlennon1@sbcglobal.net](mailto:mlennon1@sbcglobal.net)> wrote:

Dear Coastal Commission:

To preface this letter of protest, we respectfully remind you of your Mission Statement: The Commission is committed to protecting and enhancing California's **coast and ocean for present and future generations**. It does so through **careful planning and regulation of environmentally-sustainable** development, rigorous use of science, **strong public participation**, education, and effective intergovernmental coordination.

The "Major Development Pre-Application by Mid-Pen Housing (PRE2017-00032 (APN 037-022-070) is not a viable project for so many reasons. The community has been attempting to communicate concerns in several meetings with Mid-Pen and with letters to the San Mateo Board of Supervisors about serious concerns regarding infrastructure, antiquated zoning; traffic congestion, egress and ingress into the property safely, environmental concerns of contamination on the property that will be disturbed and airborne if disturbed.

**Infrastructure concern:** Failing Sewer System; water capacity and available. There have been 101 overflows in the past 6 years and with ocean warming, resulting in more severe storm surges, the saturation limit to the sewer system resulting in overflow, which cost the sewer customer higher rates, will get nothing but worse over the years.

**Antiquated zoning:** The zoning for this property was completed in 1986 when there were plans for a multi-lane Hwy bypass, which did not materialize.

**Traffic congestion:** There is only one way in and one way out. The Hwy 1 corridor is already severely impacted by daily commuters to and from but is exasperated with weekend tourist influx onto this one lane highway basically land-locking residents. In addition, the jobs are not in this area of the coast, so the project residents would be traveling south to the 92 along with hundreds of other commuters to get to their "supposed" jobs in the service and agricultural areas. And, the traffic study paid for and performed by Mid-Peninsula Housing did not accurately measure the addition of close to 300-800 daily trips created by this project and took no consideration of the Big Wave project (additional 1500 daily car trips... and its impact on the traffic. Highway 1 was designed as a pass-through highway, if the County and Mid-Peninsula Housing want to develop it to the point of dangerous overload, then they should put the infrastructure in place first: Sewer, Water, 2 lane highway, sidewalks for our children and dog walkers. We are the poor step-sister of the County government....our infrastructure has been neglected, yet they want to build, build, build! This type of development, unless for senior living only should be built on the transit route not on the tourist route...makes no sense. There are an estimated 2 million visitors to the coast every year with no road or infrastructure improvements to support the traffic.

**Ingress and Egress:** The developers are proposing entering and exiting the project from Sierra which runs directly into Carlos, which is an unmarked "country road" that requires one car to slow down or stop in order to let another car pass from the opposite direction. There is no talk of widening and lining this road, but rather they suggest they could make the road one way to the highway after exiting off of Sierra. This will cause the project residents to return to the development through the current housing neighborhoods, which are already in many ways only narrow enough for one car at a time due to parking, and again, no sidewalks for children and dog walkers. Then they proposed maybe they would use Sixteenth Avenue for the ingress and egress but Sixteenth Avenue is privately owned and maintained by the few home owners and ranchers that live back up there. This is just NOT a wise location for a project like this.

**Environmental Concerns:** There is an endless list of reasons why development, and we can literally say over-development based on all the other plans that have been approved on this small stretch of the coastal highway. Please



read the attached document developed by Resist Density, which consists of a group of hundreds of residents on the coast.

And finally, we are not opposed to affordable housing. However, we do expect our elected officials and commissioners to commit to their mission and not just fill **quotas** even when they don't make sense. The coast already has substantial affordable housing in Pillar Point (Moss Beach) and substantial senior and affordable housing in Half Moon Bay, where the service and agricultural jobs exist. There are NO jobs in Moss Beach, contrary to the Mid-Pen report of 1400 jobs with no source documents to support this number.

Please take our concerns into consideration. Remember, just because you can do something, doesn't mean you should. Plan for 20 years in the future not just for today. The impact on our coastal environment is already at a high level of risk.

Respectfully submitted,

From: [Harald](#)  
To: [Andrew Bielak](#)  
Cc: [mschaller@smcgov.org](mailto:mschaller@smcgov.org); [Ananda\\_Renee@Coastal](mailto:Ananda_Renee@Coastal)  
Subject: Cypress Point – Pre Application Workshop - September 20  
Date: Friday, October 13, 2017 4:44:02 PM

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Dear Mr Bielak,

I just saw that the MCC posted a deck titled “Cypress Point – Pre Application Workshop” with a date stamp of September 20.

<http://static1.1.sqspcdn.com/static/f/1461275/27696908/1506036382550/2017-09-20-MidPen-pre-app-presentation.pdf?token=jU8zKCQF6M538XDxJXrH63QCLrw%3D>

I'm a resident of Moss Beach and want to share a couple of comments / observations:

- The posted deck is not the same deck that was shared with the community during the September 20 Pre Application workshop. You presented only a few slides (7 or 8 if I recall it right) and some slide content has been altered in the posted version.

- On page 3 in the deck you state: “1,364 jobs in Montara, Moss Beach and El Granada”. During your presentation you presented a slide that stated “1,400 local jobs”. Please can you provide the source info and supporting detail for that figure? The community is wondering where the jobs are. The same is true for the stated income figures. A lot of High School and Community College students work for minimum wage and part time in the local restaurants and hotels and should not part of your count. My daughter (High School) is one of them and she lives at home.

- During your presentation you showed a slide that stated MidPen will “prefer locals”. I’m glad to see that you list it now on page 11 under “what we heard”... vs making the claim which is against the law.

- On page 3 in the deck you state: “Zero affordable housing anywhere in Midcoast region”. This statement is misleading. The BoS approved Big Wave which includes affordable housing for approx. 50 developmentally disabled adults. See link below for additional context.

<http://blogs.berkeley.edu/2014/06/17/hostages-strapped-to-the-tank-coastal-commission-stories-lesson-2/>

In addition, Pillar Ridge is part of Moss Beach and is classified as affordable housing according to the following publication. See link below

<https://www.gsmol.org/uncategorized/county-bans-mobile-home-park-closures-and-conversions/>

Pillar Ridge consists out of 200 plus manufactured homes and has about 1,000 residents. I just checked and it seems that we have approx. 3,100 residents in Moss Beach.

- Page 11 misses many concerns (and solutions) that were raised by the community since day 1. See links below for a summary provided by Resist Density.

<http://static1.1.sqspcdn.com/static/f/1461275/27703175/1506611069043/2017-09-26-MidPen->

[ResistD-comments.pdf?token=0Y9RY7DQTiKSRMZ%2BVWH1jmPkJo%3D](https://docs.wixstatic.com/ugd/1b818a_3c61e829fa13481cb5a0706ebc991b36.pdf?token=0Y9RY7DQTiKSRMZ%2BVWH1jmPkJo%3D)  
[https://docs.wixstatic.com/ugd/1b818a\\_3c61e829fa13481cb5a0706ebc991b36.pdf](https://docs.wixstatic.com/ugd/1b818a_3c61e829fa13481cb5a0706ebc991b36.pdf)

In summary - the posted deck should not be labeled as “Cypress Point – Pre Application Workshop” with a Sep 20 date stamp as this was not the content that was shared with the community during the workshop. In addition, some content seems to be misleading, is incomplete and requires clarification. I'm looking forward to the Pre Application workshop minutes.

Thank you.

Sincerely,

Harald Herrmann  
Moss Beach

From: [Harald](#)  
To: [mschaller@smcgov.org](mailto:mschaller@smcgov.org)  
Cc: [Ananda\\_Renee@Coastal](mailto:Ananda_Renee@Coastal); [Dpine@smcgov.org](mailto:Dpine@smcgov.org); [Cgroom@smcgov.org](mailto:Cgroom@smcgov.org); [Dhorsley@smcgov.org](mailto:Dhorsley@smcgov.org); [Wslocum@smcgov.org](mailto:Wslocum@smcgov.org); [Dcanepa@smcgov.org](mailto:Dcanepa@smcgov.org)  
Subject: Concerns - MidPen Housing Development in Moss Beach  
Date: Tuesday, September 26, 2017 3:42:28 PM

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Dear Mr Schaller,

I'm a resident of Moss Beach and want to share a couple of concerns. The following statements and comments express my own opinion but summarize concerns that were / are raised by many community members:

### **1. MidPen Pre App workshop and approach**

The workshop became hostile after the audience realized that we will have table discussions instead of a public forum. This came across as a “trick” to contain and limit information sharing across the audience. The third party facilitator missed to read the audience, insisted on her process and we lost 20 plus minutes debating the approach. In addition, the meeting started late.

MidPen's slides lacked clarity (how can they miss to note the community center), did not address issues that were raised since day one, contained wrong/ misleading information and lacked source information. For instance - preference for locals: this violates existing laws but MidPen continues to make that point. They stated that we have 1400 local jobs in El Granada / Princeton, MB, and Montara but miss to provide the source info. Jan Lindenthal, MidPen's vice president of real estate development is quoted in the SM Journal “Still, with 1,300 low-income jobs on the midcoast.” 1400 vs 1300 with no source information? Where are the jobs? There is a low level of confidence in the quality of the minutes that will come out of the Pre App meeting as the note takers on the flip charts seemed to struggle to keep up with the discussion. Why was the workshop not recorded and why did the county not publish the date and time of the workshop to the impacted neighborhoods? The MCC published the date and time. MidPen published workshop minutes in the past but they were summarized and missed many critical points that were made by the community and have not been addressed in the recent proposal.

MidPen tried to sell “pluses” where they “gave in” based on community input but it turned out that they are required by law to offer for instance a certain number of parking spots per unit or meet certain LCP requirements. MidPen did not share a timeline with the community but I understand that they did in a session with the CCC and County staff. Why is that? They claim to work with the impacted community and make it a transparent process.

### **2. KAI traffic impact assessment study from June 2017**

The study downplays the impact and states that the project will not significantly impact the adjacent Highway 1/ Carlos Street intersection and has “sufficient operational capacity.”

How can an additional couple of hundred daily car trips plus visitors to the community center have no impact? There is no walk-ability. How will an additional pedestrian crossing to Point Montara plus a couple of hundred cars accessing Highway 1 at a dangerous blind curve impact traffic flow on Highway 1?

#### Calculation of increase in traffic volume

The KAI traffic assessment report states “The project is expected to add 37 trips during a typical weekday AM peak hour, 45 trips during a typical weekday PM peak hour...”

How does the math work? Why doesn't the report provide the underlying assumptions?



We are looking at 71 units with an average of 1-3 cars per unit translating to approx 100-200 cars plus x daily visitors to the new community center. 100-200 cars times 3-4 trips per day translate to approx. 300 – 800 daily car trips in and out of the development plus x daily visitors to the community center.

Now add 1500 daily car trips in and out of the Big Wave development and we have the perfect gridlock between El Granada and Montara. Plus an estimated 2 Mio annual visitors to the Coastsides...

#### Blind Curve – risk of significant increase of car accidents

Signalization of the Highway 1 / Carlos intersection, or roundabout and a pedestrian crossing in close proximity will most likely result in a significant increase of accidents. Drivers from the South do not have visibility beyond the curve and stopped traffic or a pedestrian crossing on Highway 1 will add to the accident risk. A reduction of speed will most likely be ignored by many residents and visitors to the Coastsides .

#### Cumulative effects

The KAI traffic study is looking only at the MidPen development and ignores surrounding measures that are planned by the County. Moss Beach is one of the access choke points for Big Wave and current plans show 2 additional traffic lights (Connect the Coastsides) in Moss Beach:

- Highway 1 / Cypress Ave intersection to channel a subset of 1500 daily car trips in and out of the Big Wave development
- Highway 1 / California intersection
- Plus whatever the decision is for the Highway 1 / Carlos intersection

How will the traffic flow on Highway 1 be impacted with all the additional signals (maybe one turns into a roundabout), increased traffic volume resulting out of the MidPen and Big Wave developments (ignoring the 2 new Hotels in Montara for now) and an estimated 2 Mio annual visitors to the Coastsides?

#### Creation of Parallel Roads

What is the impact on neighborhood streets and Farallone View Elementary School (many kids walk and bike to school and many roads do not have sidewalks ) in Montara and Moss Beach as commuters and tourists try to bypass the gridlock on Highway 1 that will be created by the additional traffic measures and the MidPen and Big Wave developments?

The KAI study references outdated and incomplete traffic / transportation studies i.e. Connect the Coastsides that do not reflect current Coastsides traffic realities.

The outlined solutions do not address the concerns and will significantly increase the risk for accidents.

### **3. Failing Infrastructure: Sanitary Sewer Overflows (SSOs)**

Resist Density just released information about an environmental disaster on the Coastsides - a total of 101 sewage overflows (20 Category 1!!!) were recorded from Half Moon Bay to Montara from 2011 to mid 2017, according to public records. These findings raise significant questions as to whether the infrastructure can accommodate any more large development. The overflows are not isolated to specific locations and seem to indicate a systemic issue with the underlying infrastructure and capacity of the sewage systems.

How did a large brewery (as part of Big Wave and declared as “minor modification” instead of an office building) get approved knowing that large and problematic amounts of waste water are a byproduct of beer brewing? Does the underlying and failing infrastructure need

to get fixed to stay in compliance with existing environmental laws before large developments can be added to the system?

#### **4. Site Contamination**

Detailed maps of the facility and military usage are available. The types of military activities conducted on the site made use of many supplies and materials such as fuels, oils, tar, cleaning fluids, solvents, brake fluid, antifreeze, pesticides and building materials – many of which are known today to produce environmental toxins. In addition, there was at least one underground fuel tank, one or more power transformers and an incinerator. Burning waste in an incinerator is now known to produce toxins. The Navy's standard operating procedure at the time would have been to dump, bury or burn waste and refuse, which included the above supplies and materials. Extensive research did not reveal any records that the site has been cleaned up.

I have 2 children and I'm very concerned about the potential release of toxins in the air and / or our drinking water as part of the housing development.

#### **5. Safety and Disaster Preparedness**

Accessibility for medical emergencies and first responders is already constrained and will be further reduced by large- scale developments without making adjustments to the existing infrastructure. Evacuation routes in case of major disasters (i.e. Earthquake, Tsunami, Fire) won't be accessible for Coastside residents and would strand the whole community and tourists. Many weekends are already a traffic nightmare for the Coastside.

Recent data (provided by a Fireboard member) show that we had 951 medical aid responses and 82 traffic accidents between January and July 2017. This data reflects 7 months of 2017 only and indicate a very concerning trend. What are the plans to ensure safety, accessibility and disaster preparedness for the Coastside? Or is that up to the community to figure it out after another large scale development is approved without the supporting infrastructure in place?

Thank you for your consideration.

Sincerely,

Harald Herrmann, Moss Beach

**From:** [Adrian Mallinger](#)  
**To:** [Ananda, Renee@Coastal](mailto:Ananda.Renee@Coastal)  
**Subject:** MidPen's proposed low income housing in Moss Beach  
**Date:** Monday, September 25, 2017 8:05:55 AM

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Renee Ananda, CA Coastal Commission Coastal Program Analyst,

My families chief reason for opposing this project is that it cannot provide adequate emergency services and safe living conditions for the people it would house that would then contribute to a deterioration of our neighborhood.

The proposed "low income housing" would be for the most vulnerable members of our state – those who have no income and limited if not nonexistence opportunities for employment due to physical handicaps, mental challenges, lack of family structure, societal limitations etc. Because of this, they rely the most on emergency services of fire, emergency medical and law enforcement. The sheriff and fire station in Moss Beach is not staffed 24 hours and the hospital is poorly staffed at best. Hence these emergency service providers would be unable to support the needs of this proposed housing plus the other residents of the mid-coast. Most cities have a separate, dedicated substation to manage the needs of such housing. Another concern brought up was the fire danger of the housing being surrounded by undeveloped portions of 15<sup>th</sup> Street, 16<sup>th</sup> Street and the Peninsula Open Space Trust. The MidPen agency has no power to increase emergency staffing in the area and hence cannot provide for the safety and burdening needs of those living there while also servicing the surrounding neighbors.

These most vulnerable segments of our state's population need adequate housing. They also need other necessities and amenities if they are expected to, at a minimal survive, and at best, increase their security and opportunities. Most high density low income housing is in centralized urban areas to provide the residents who are dependent on services easy and fast access to supermarkets (where is the nearest WIC - Women, Infants and Children Food and Nutritional Service store?), schools, clinics and various social services in addition to job opportunities and government funded special employment programs. The proposed housing of 70+ units would leave 70+ families landlocked with limited if not absent options.

A few community members at last Tuesday, September 19th Mid Pen meeting spoke of their hopes that this project would providing housing for their siblings, children and employees who are struggling to find housing on the coast while employed in low paying jobs. The term MidPen is using of "low income housing" is misleading. To be clear, this proposal is for the huge state wide waiting list for Section 8 and HUD housing. No one who has a full time minimal wage job would be eligible. This housing proposal does not solve the needs of those priced out of the area; maids and janitorial services, kitchen staff, entry level low skilled and manual labor. (And no schoolteachers would be there). Only a city would have the resources, experience and available innovated options to try and help those most unfortunate who are in the need of Section 8 and HUD housing, not the coast.

Structurally, the proposed parking lot would run the length of 16<sup>th</sup> Street. In order to safely light the lot for the housing residents, the glow from the parking and street lamps would illuminate the sky changing the rural characteristic of the area. The inevitable loitering that occurs in the parking lots and adjacent streets of such housing produces crime, garbage and light and noise pollution.

Historically similar types of housing projects have a corresponding explosion of crime rates, which is not limited to car break ins and thefts but also home burglaries, robberies, shootings, stabbings and all violent crimes. One will find in all similar housing in the state, these kinds of projects are home to violent street gangs. Presently, cities are moving to a new model of mixed income housing as the single low income high density model that is being proposed in our neighborhood has proven too been unsuccessful and provides a breeding for crime and creates slum living situations. The people living in the proposed housing here will have a lack of opportunities to find work in the coastal area where a city would have more options.

In addition, there was the much talk about the increased traffic. For such details, please see Resist Density's

website: <https://www.resistdensity.org/>.

We can assure you this will negatively affect those already living here and cannot adequately provide for the needs of the people they are compassionately but shortsightedly trying to help.

Thank you,

Adrian

[650-743-8562](tel:650-743-8562)



From: [David Magnuson](#)  
To: [mschaller@smcgov.org](mailto:mschaller@smcgov.org)  
Cc: [Ananda, Renee@Coastal](mailto:Ananda.Renee@Coastal); [MossBeach@midpen-housing.org](mailto:MossBeach@midpen-housing.org)  
Subject: mid-pen project @ Moss Beach  
Date: Wednesday, September 20, 2017 10:33:32 AM

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Mr Schaller,

I'm not particularly opposed to the affordable housing project on the hill above me, but I am curious. On behalf of full disclosure, I have a question. As a former Environmental Engineer and Master Planner for the Department of Defense (DoD), I would be interested to know more about the real estate transfer and any preliminary assessment that might have been done on the property.

What documents are available regarding the real estate transfer of the property? Was some sort of detailed environmental clearance done and is it available to the public? Since this property was zoned in 1986 for low-income housing, I assume it had already been turned over to the county. I have searched, but have not found, any documentation regarding the transfer from the federal government. Since 1986 preceded the passage of the "Federal Facilities Act" (H.R. 2194 — 102nd Congress Federal Facilities Compliance Act of 1991 ([www.govtrack.us/congress/bills/102/hr2194](http://www.govtrack.us/congress/bills/102/hr2194) )), you may be aware that environmental practices on military bases prior to the passage of that bill were often conducted under the concept of sovereign immunity, without oversight by local and state authorities for compliance to environmental law. After the passage of the Federal Facilities Act (FFA), DoD and the Department of Transportation, with state and local input, became much more thorough in screening properties before releasing them, with at least a Preliminary Assessment performed by environmental professionals. Prior to FFA, property was sometimes released with a statement of finding by a real estate specialist that no record of contamination exists.

Maps of the facility that are available online show operations occurred there that might have required more clearance under the FFA than previously (fueling, incineration, garage, utilities). As a minimum, the operations at the facility would have been documented and made available for public comment. Was this done? Can it be elaborated on now in a public forum?

If this information has already been made available, as well it may, please excuse my ignorance. I have not been following this closely, but this is what kind of piqued my interest from the start because of my experience previously working at military bases in the bay area, southwest, northwest and overseas.

sincerely,  
David A Magnuson  
2008 Vallemar, Moss Beach

From: [Karen deMoor](#)  
To: [Ananda, Renee@Coastal](mailto:Ananda.Renee@Coastal)  
Subject: video of blind curve on HWY 1 in Moss Beach  
Date: Wednesday, September 13, 2017 3:46:31 PM

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Hi Renee,

I hope this email finds you well. I wanted to share with you a video that we recently released on the blind curve and road infrastructure concerns we have with MidPen's proposed housing development of the 1 Sierra Street property in Moss Beach (see link below).

After reviewing MidPen's preliminary traffic assessment submitted with its pre-application, we continue to be very troubled that these issues are missing a remedy. We made this video to raise awareness and give a visual experience of what it's like to drive these road, and ask the question of how hundreds of additional cars would impact this situation.

We hope that this is informative and helps you understand our concerns better. Please feel free to contact me with any questions or feedback - Thank you for your support!

Karen

<https://youtu.be/OaE9hdYPHZE>

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Karen deMoor  
Board Member | [Resist Density](#) | [www.ResistDensity.Org](http://www.ResistDensity.Org)  
*Sensible planning and protection for the San Mateo County Midcoast!*

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From: [Ron](#)  
To: [mschaller@smcgov.org](mailto:mschaller@smcgov.org); [Ananda.Renee@Coastal](mailto:Ananda.Renee@Coastal)  
Subject: Housing Development in Moss Beach  
Date: Monday, September 11, 2017 3:04:24 PM

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This proposed 71 unit housing development in Moss Beach seems to me way out of scale for such a small neighborhood. I live near by in Montara and I'm not at all in favor of such a large construction. Why 71 units? To maximize the density (read developer profit)?

What happens to mitigate traffic during construction, much less after all the units are occupied? Yet another stoplight on HWY 1? What alternatives have been considered? If there are alternatives, are their descriptions available for public viewing.

Please come up with something on a more appropriate (i.e., smaller) scale.

## MEMORANDUM

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Date: August 7, 2017

Project #: 20616

To: Andrew Bielak  
MidPen Housing

From: Mike Alston, Aaron Elias, P.E., Damian Stefanakis  
Project: Cypress Point Preliminary Traffic Assessment  
Subject: Alternatives for Carlos Street and Highway 1 (Version 2)

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This memorandum by Kittelson and Associates, Inc. (KAI) presents an initial evaluation of the traffic impacts of an affordable housing proposal in Moss Beach, California and an assessment of the nearby Highway 1/Carlos Street intersection. MidPen Housing is proposing to build Cypress Point, a 71-unit affordable housing development in Moss Beach, an unincorporated community in San Mateo County, California (Project). Based on initial data collected, KAI has found that the Project will not significantly impact the adjacent Highway 1/Carlos Street intersection and the existing two-way stop control provides sufficient operational capacity with the Project. However, in order to respond to existing questions or concerns at a local level regarding the Highway 1/Carlos Street intersection, KAI has analyzed current conditions and potential improvements to the intersection.

The Project site will be accessible via Carlos Street, which connects to California Highway 1 (the Cabrillo Highway) at an unsignalized intersection just north of the site. To the South, Carlos Street runs parallel to the highway through Moss Beach. The County of San Mateo has expressed interest in improving circulation and safety at the Highway 1/Carlos Street and the nearby Highway 1/16th Street intersection.

Under current conditions and with project traffic added, the Highway 1/Carlos Street intersection has sufficient operational capacity as a two-way stop control intersection. However, two main conditions at the intersection may warrant consideration for improvement:

- Drivers on Carlos Street lack sufficient sight distance to the South given the operating speeds along Highway 1;
- There are overlapping and conflicting left turns using the same two-way left turn lane for drivers entering Carlos Street and those accessing the Point Montara Lighthouse.



A number of background studies propose crosswalks and/or trail crossings near the intersection, which would contribute to the development of a regional coastside trail. The current conditions, which include a 50 mile-per-hour posted speed limit and uncontrolled through traffic on Highway 1, would need to be modified to accommodate a pedestrian crossing.

Given the low traffic volumes at this intersection today, there is no warrant for or obvious benefit to signalization at this intersection. Therefore, the existing stop-control or a roundabout (i.e. yield control) intersection could be appropriate for alternative solutions. For either stop-controlled or roundabout solutions, there are grading and topographic considerations that are currently unknown in scale, difficulty, and cost. Maintaining stop-control at the intersection likely should include some access realignment or other modifications to enhance sight distance and access. A roundabout would entail geometric design on the Highway 1 approaches to achieve slower operating speeds. Lastly, there are grading concerns: Highway 1 itself curves both vertically and horizontally through Moss Beach, and there is a berm on the eastern side of the road that affects sight distance and makes earthwork more challenging.

This memorandum presents a summary of background studies pertaining to this intersection, existing conditions at the intersection, project conditions, and alternatives to improve the Highway 1/Carlos Street intersection.

## BACKGROUND

The Project site is located on the corner of Carlos Street and Sierra Street in Moss Beach and its proposed access is on Carlos Street. Carlos Street forms a “T” intersection with Highway 1, as there is no access on the West side of the highway. Approximately 150 feet north of Carlos Street is the four-way intersection of Highway 1 and 16th Street. This intersection (“Point Montara intersection”) features access to the Point Montara Lighthouse and its parking lot on the west side of Highway 1. The Point Montara intersection has been discussed in a number of reports, mostly with a focus on multimodal access for visitors of the lighthouse, the beach, and through- trail users. The following section provides a summary of prior studies.

### *Highway 1 Safety and Mobility Improvement Study: Phase 2*

In November 2012 the San Mateo County Board of Supervisors accepted the *Highway 1 Safety and Mobility Study*, a report focused on multimodal safety and mobility solutions along Highway 1 through a 5.5-mile study area that included Moss Beach. The study identified the Point Montara intersection as a location of high pedestrian crossing demand and recommended two crossing alternatives, shown in Exhibit 1. In both scenarios, left turns from Carlos Street onto Highway 1 are eliminated, and the conflicting left turns on Highway 1 are addressed with back-to-back left turn bays into Carlos Street and 16<sup>th</sup> Street.



The study also suggests “naturally reducing” vehicle speeds with features like medians, gateway and edge treatments into and out of identified community zones. Its “recommended target speed” through the Point Montara area is 40 miles per hour, compared to an existing speed limit of 50 miles per hour. The study acknowledges that speed limits cannot be changed arbitrarily but prevailing speeds can be influenced through roadway design.

**Exhibit 1: Proposed Trail Crossings at Point Montara Intersection in the Preliminary Planning Report for Highway 1 Congestion & Safety Improvement Project**

**Short Term Option: Pedestrian Crossing at Grade**



**Long-Term Option: Pedestrian Overcrossing**



Source: Highway 1 Safety and Mobility Improvement Study: Phase 2, 2012.



### *Preliminary Planning Report for Highway 1 Congestion & Safety Improvement Project*

In August 2015 the San Mateo County Transportation Authority released its *Preliminary Planning Study for the Highway 1 Congestion & Safety Improvement Project*. The Point Montara and Highway 1/Carlos Street intersections are discussed in this report with respect to pedestrian crossing opportunities.

The report offers two crossing alternatives, included here as Attachment B. Alternative 1 includes advanced yield markings, painted medians on both Highway 1 approaches, and a crosswalk with push-button rectangular rapid flashing beacons (RRFBs) across the northern leg of the Point Montara intersection. The second alternative includes raised medians on both Highway 1 approaches, a crosswalk with RRFBs, and a mid-block pedestrian refuge on the northern leg of the intersection. This alternative would require widening the roadway and constructing a retaining wall along the western side of Highway 1. The report ultimately recommends Alternative 1 at the 16<sup>th</sup> Street intersection as a cost effective solution. The study also points out a lack of traffic calming features or any signaling to drivers of changing context zones along Highway 1, citing the proposed pedestrian crossing with rectangular rapid flashing beacons as recommended traffic-calming improvements.

### *Connect the Coastside*

In March 2016 San Mateo County released a draft report of the *Connect the Coastside* study. The study identifies transportation improvements consistent with the Midcoast Update to San Mateo County's Local Coastal Program to show land use and transportation infrastructure that can support future development scenarios.

The draft study recommended a median with back-to-back left-turn bays at the Point Montara intersection and Carlos Street to improve circulation and to assist pedestrians crossing Highway 1, with the median serving as a crossing refuge. The study also recommended signage to restrict left turns at Carlos Street and traffic calming measures along Carlos street south of the project site. These recommendations are expected to remain consistent in the next version of the report.

The study also addressed operational deficiencies further south in Moss Beach at Highway 1/California Avenue and at Highway 1/Cypress Avenue, suggesting a roundabout in each case but ultimately recommending signalization. The study added that the roundabout option at Highway 1/California Avenue would require "significant study and a large footprint." At Highway 1/Cypress Avenue, a signal showed capacity improvements but a roundabout did not. However, the County is further exploring these alternatives for the next version of the report.

An updated draft of the study is due in the summer of 2017.

### SUMMARY OF BACKGROUND STUDIES

The three studies focus on the Point Montara intersection as a pedestrian crossing. As two of the studies highlight, lower travel speeds would help support and enhance crossing opportunities and



promote overall safety through the Point Montara and Highway 1/Carlos Street intersections. Two of the studies recommend restricting movements into and/or out of Carlos Street, but do not provide extensive explanation for these recommendations. There is no discussion of a change in control type.

## EXISTING CONDITIONS

This section discusses existing conditions at the Highway 1/Carlos Street intersection and the Point Montara intersection based on field observation, multimodal turning movement counts, and traffic operations analysis conducted from April through June 2017.

### Traffic Operations Analysis

Both the Highway 1/Carlos Street intersection and the Point Montara intersection are two-way stop-controlled intersections, with the through vehicular movements on Highway 1 operating uncontrolled. The Highway 1/Carlos intersection operates with minimal control delay and within the San Mateo County guidelines for acceptable operations<sup>1</sup>. Traffic counts conducted in April 2017 show the following numbers of drivers turning onto Highway 1 from Carlos Street: 23 drivers in the weekday AM peak hour, five drivers in the weekday PM peak hour, and 11 drivers in the Saturday midday peak hour. Given the low volumes, the intersection operates at a level of service (LOS) B or better for all movements under existing conditions. See Attachment C for preliminary traffic operations findings.

The Project is expected to add 37 trips during a typical weekday AM peak hour, 45 trips during a typical weekday PM peak hour, and 37 trips during a typical Saturday midday peak hour. Preliminary operational analysis shows that, with the additional trips from the Project, the intersection will operate at LOS C or better, which is acceptable based on the LOS C standard (with no individual movements below LOS D) in the San Mateo County Guidelines.<sup>2</sup> Refer to Attachment C for preliminary traffic operations findings.

Based on this data, the Project does not demonstrate a substantial impact on the operations of the Highway 1/Carlos Street intersection. The existing two-way stop control provides sufficient operational capacity with the Project.

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<sup>1</sup> *Traffic Impact Study Requirements*, County of San Mateo, December 9, 2014

<sup>2</sup> *Traffic Impact Study Requirements*, County of San Mateo, December 9, 2014



## Geometric Conditions

*KAI performed a field visit on Wednesday, May 10, 2017. Based on this field visit and a review, KAI identified two notable geometric conditions:*

### *Overlapping Turn Lanes*

Carlos Street and 16th Street are roughly 150 feet apart, and both consist of stop-controlled access to Highway 1. This close proximity creates some interaction between the two intersections that has been addressed in previous studies. Notably, northbound drivers turning left into the Point Montara Lighthouse parking lot and southbound drivers turning left onto Carlos Street must share a two-way left turn lane that is approximately 125 feet in length. This storage length creates some challenges for turns by putting opposing movements in conflict and providing limited deceleration length.

### *Intersection Sight Distance*

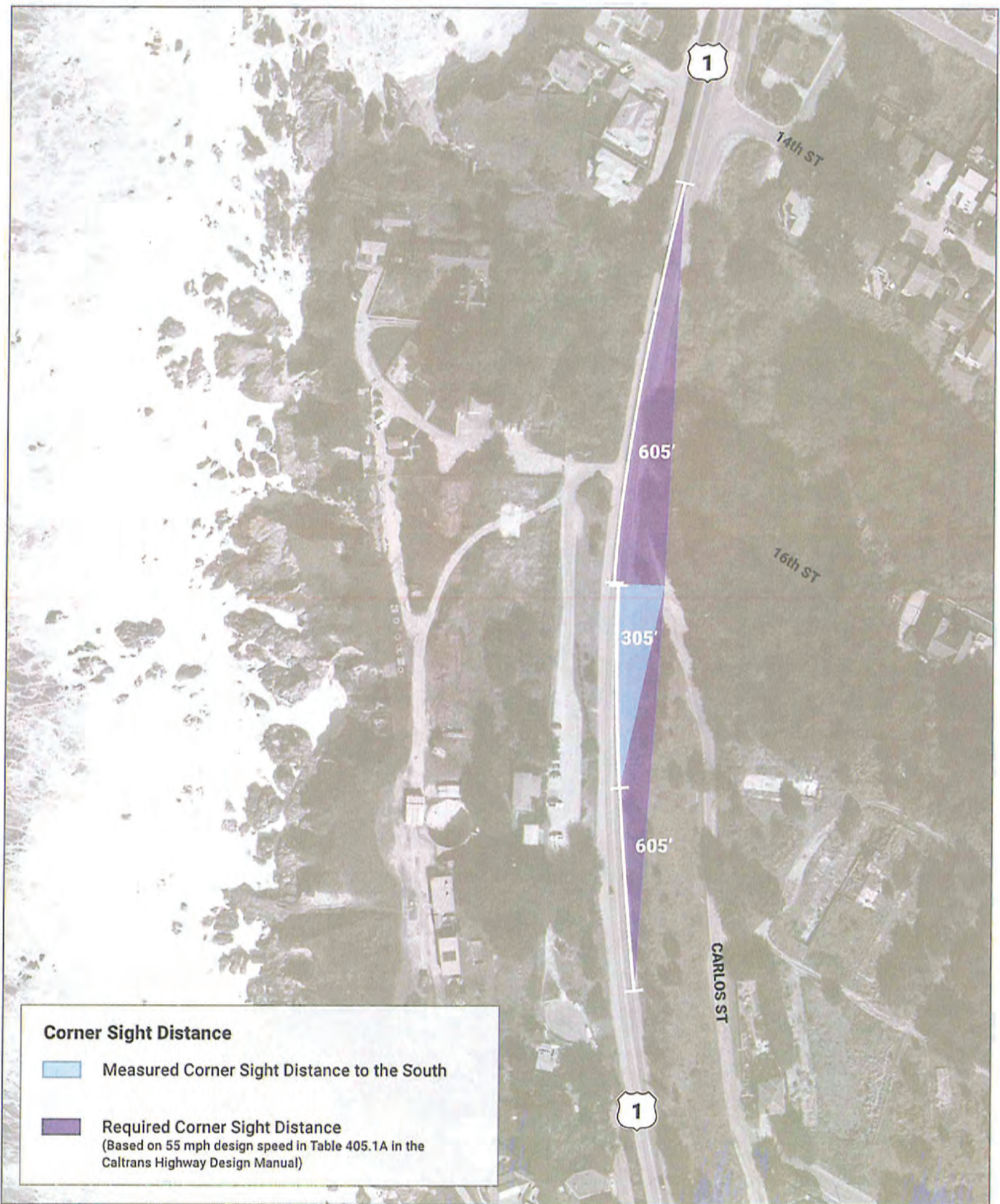
The speed limit on this portion of Highway 1 is 50 miles per hour. The Caltrans *Highway Design Manual* lists required corner sight distance at a two-way stop-controlled intersection based on the design speed of the primary (i.e., uncontrolled) street. Adequate corner sight distance refers to the following:

*Adequate time must be provided for the waiting user to either cross all lanes of through traffic, cross the near lanes and turn left, or turn right, without requiring through traffic to radically alter their speed.*

Based on an assumed design speed of 55 miles per hour (conservatively 5 miles per hour greater than the posted speed), the Caltrans *Highway Design Manual* standard for corner sight distance is 605 feet. This distance provides 7-1/2 seconds for side-street drivers to turn either left or right onto Highway 1 and accelerate to the appropriate speed. This distance should be provided in both directions, per Table 405.1A in the Caltrans *Highway Design Manual*.

KAI conducted field measurements of corner sight distance at the Highway 1/Carlos Street intersection and found that the sight distance to the South was 305 feet (see Figure 1) or about 300 feet less than Caltrans' required corner sight distance. The lack of visibility beyond 305 feet is attributable the road's horizontal curvature, its vertical curvature, and trees and berm on the eastern roadside. While the Design Manual requirements would apply to the design of any new intersections, they also identify whether an existing intersection does not meet the current standard. Therefore, any modifications to an existing intersection would need to address current Caltrans standards.





Date: 5.17.2017

Scale in Feet

0 200 North

Moss Beach Housing TIA / Carlos Street and Highway 1

**Corner Sight Distance**

**FIGURE 1**



## INTERSECTION CONTROL

There are three primary control alternatives that can be considered in determining changes to the intersection to correct geometric deficiencies. These include:

1. Stop control
2. Roundabout
3. Signal control

Each control option has benefits and drawbacks, and all options would require additional improvements to address pedestrian access across Highway 1. Additionally, all options would require coordination and approval from Caltrans as the managing agency of Highway 1.

### 1. Stop Control

The Highway 1/Carlos Street intersection currently operates under two-way stop control. As previously discussed, stop control on Carlos Street provides sufficient intersection capacity. However, if stop control is maintained, there are three primary areas that should be examined to address the existing challenges with the intersection – the insufficient corner sight distance, overlapping left turns with the 16th Street intersection, and lack of pedestrian access.

#### *Overlapping Left Turns*

One option to eliminate the overlapping left turns (northbound left onto 16<sup>th</sup> Street and southbound left onto Carlos Street) is to combine the Carlos Street and 16<sup>th</sup> Street access to Highway 1. A single access point would eliminate the left turn at the existing Carlos Street alignment, making the existing two-way left turn lane operate as a single northbound left turn pocket. This realignment would remove the overlap and conflict between the two turning movements. The feasibility of this option depends in large part on the size of the Caltrans right of way and will require more detailed survey/topographic information.

#### *Sight Distance*

With existing operating speeds, earthwork or tree clearing would be necessary to clear sight distance to the South at Carlos Street. This would include cutting back trees and re-grading the berm between Highway 1 and Carlos Street. While clearing the land would provide adequate sight distance for the horizontal curvature of the road (see Figure 1), there is also a vertical curve due to elevation changes that may obstruct sight distance. Because Highway 1 crests south of the Carlos Street intersection, a driver may not be able to see vehicles on the other side of the crest of the curve. A detailed topographic map would be needed to determine if the vertical curve provides adequate sight distance.



### *Restrict Movements at Carlos Street*

Another option to maintain a stop controlled intersection at Carlos Street is to restrict outbound movements from Carlos Street onto Highway 1. This would convert Carlos Street into a one way (inbound) street. Drivers in the neighborhood could access Highway 1 via Etheldore Street approximately 2,000 feet south. This alternative removes the corner sight distance requirement.

Along with the movement restriction, a conversion of the two-way left turn lanes to back-to-back left turn bays would eliminate the overlap in left-turn movements. A similar treatment is shown in Exhibit 1, proposed in the *Highway 1 Safety and Mobility Study*. This treatment would provide room for left-turn storage but not enough for full deceleration. Therefore, vehicles would have to decelerate on Highway 1 before entering the turn lane.

This alternative would have the advantage of requiring no construction and no change to Highway 1 other than restriping the two-way left turn lane, but would represent an increase in activity at the Etheldore/Highway 1 and/or California/Highway 1 intersections for existing and future trips that would otherwise access Highway 1 at Carlos Street.

Either stop-control scenario would need additional improvements if crosswalk or trail crossing were planned, as proposed in the background studies. A transition zone with lower speeds, as mentioned in the *Highway 1 Safety and Mobility Study*, would be appropriate to promote a crossing at this location. The two-stage crossing with a median, proposed in the *Preliminary Planning Report*, also has merit and would pair with lower operating speeds. A lower operating speed would relax the corner sight distance requirements at intersections, as well.

## 2. Roundabout

A change of control from stop control to a roundabout would convert all approaches to yield control, eliminating the applicability of the corner sight distance standard. Drivers on Carlos Street, Highway 1, and 16th Street (if it is brought into a roundabout alignment) would all be required to yield to drivers inside the roundabout making conflicting movements. A roundabout would also require reducing vehicle speeds and would eliminate the overlapping left turn lanes for 16th Street and Carlos Street if the two intersections could be combined into a single roundabout. The reduced speeds would better provide for controlled pedestrian crossing locations consistent with the needs identified in background studies.

*Roundabouts: An Informational Guide*<sup>3</sup> explains that roundabouts are an ideal option for supporting speed reductions “within small communities along an extended highway,” through the use of geometric design features like horizontal curves on the highway approaches. Creating such features at this location would present challenges based on topographic constraints, including limited right-of-

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<sup>3</sup> NCHRP Report 672. *Roundabouts: An Informational Guide*, 2<sup>nd</sup> Edition, 2010.



way, grade changes, and existing horizontal curvature of the roadway. These constraints may require additional right-of-way clearance, cutting into terrain and trimming back foliage.

### 3. Signal Control

A first step to determine whether a signal is an appropriate solution at an intersection is to determine if the intersection meets the signal warrants provided in the *California Manual on Uniform Traffic Control Devices (MUTCD)*. The MUTCD lists several criteria (warrants) under which the need for a traffic signal can be established. The Highway 1/Carlos Street Intersection was analyzed to determine if it meets the peak hour signal warrant as described in Chapter 4C of the California MUTCD<sup>4</sup>. The volumes and side street delay were insufficient to meet the peak hour signal warrant.

The Caltrans *Highway Design Manual* says corner sight distance values should be maintained even at signalized intersections due to “unanticipated conflicts . . . due to violation of signal, right turns on red, malfunction of the signal, or use of the flashing red/yellow mode.” The combination of not meeting the signal warrant and the implications of unanticipated conflicts makes signalization of this intersection a less desirable option than the two control types previously described.

## SUMMARY

The Project proposes access along Carlos Street, which would route most trips to and from the site through the Highway 1/Carlos Street intersection. The intersection provides sufficient capacity with the existing two-way stop control under existing conditions and if the Project were built.

Based on current conditions at the intersection, there are other considerations at this location that could warrant improvement. This memo has explored options to address conflicting left turns, limited corner sight distance, and compatibility with proposed pedestrian crossings. Based on the initial research, there are two options that could be explored further: maintaining the existing two-way stop control with access modifications, or implementing a roundabout, with a roundabout likely to involve significantly more cost and design challenges. The third option of adding a traffic signal was found to not address sight distance and would not be need for traffic operations.

In order to facilitate pedestrian crossings as identified in background studies, either for the two-way stop control or roundabout intersection, additional traffic-calming measures and transition zones would need to be established prior to the intersection to slow the operating speeds through the area. These improvements would improve the feasibility of constructing a crosswalk across Highway 1.

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<sup>4</sup> KAI analyzed the signal warrants using multimodal turning movement counts collected for this project.

## NEXT STEPS

As a next step, KAI would recommend further coordination with all relevant parties regarding potential options for the intersection. A more detailed traffic study and Intersection Control Evaluation (ICE) could then be completed as required for Caltrans approval. Once an option is approved, a proposed transportation improvement could move into final engineering design and construction.

## Attachment A: Project Site

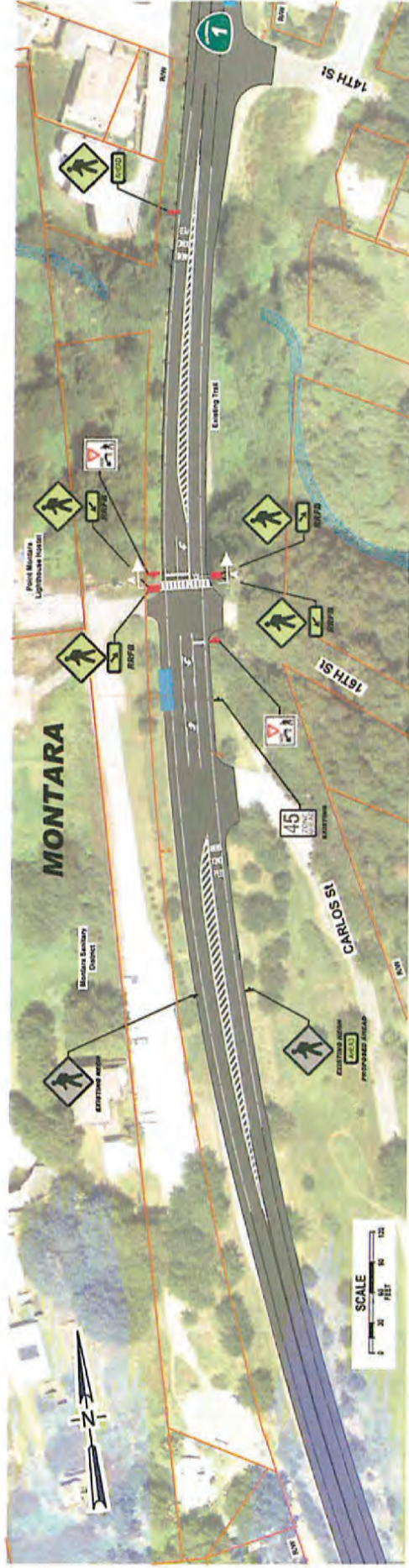






## **Attachment B: Highway 1 Preliminary Planning Study Proposed 16th Street Crossings**

# DESIGNATED PEDESTRIAN CROSSING 16TH STREET - ALTERNATIVE 1



## RECTANGULAR RAPID FLASHING BEACON WITH PAINTED MEDIAN



### LEGEND:

- EXISTING STRIPING
- EXISTING ROADWAY

- PROPOSED STRIPING
- EXISTING BUS STOP

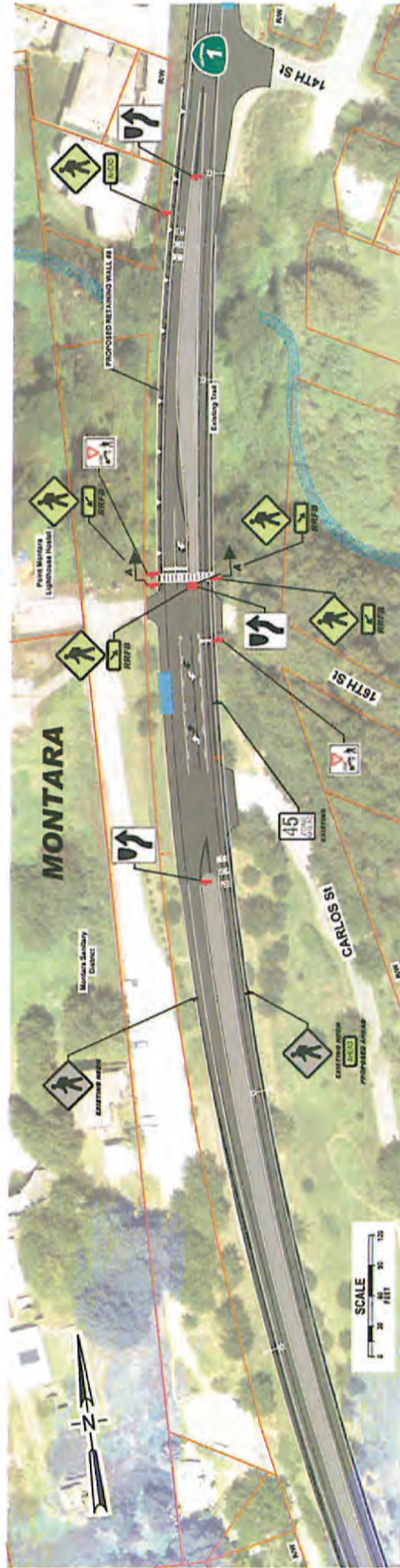
- EXISTING SIGNAGE
- PROPOSED SIGNAGE



**16TH STREET, MONTARA  
HIGHWAY 1 PRELIMINARY PLANNING STUDY (PPS)**



# DESIGNATED PEDESTRIAN CROSSING 16TH STREET - ALTERNATIVE 2



## RAISED MEDIAN WITH TYPE D CURB AND RAPID RECTANGULAR FLASHING BEACONS



### LEGEND:

	PROPOSED WIDENING		PROPOSED STRIPING		PROPOSED RAISED MEDIAN		EXISTING BUS STOP
	EXISTING ROADWAY		EXISTING STRIPING		PROPOSED SIGNAGE		EXISTING SIGNAGE



## 16TH STREET, MONTANA HIGHWAY 1 PRELIMINARY PLANNING STUDY (PPS)

## **Attachment C: Preliminary Traffic Operations Findings**



Level-of-service (LOS) analyses described in this memo were performed in accordance with the procedures stated in the 2000 *Highway Capacity Manual*<sup>5</sup> (HCM). The LOS methodology is a qualitative description of the performance of an intersection based on average delay per vehicle. For signalized intersections and all-way stop control intersections, the LOS is based on the volume weighted average of the delay for each approach. For two-way stop control intersections, the average delay and LOS for the worst stop-controlled approach at the intersection is presented. The intersection LOS was calculated using Synchro 9 software package.

Intersection level-of-service ranges from LOS A, which indicates free flow or excellent conditions with short delays, to LOS F, which indicates congested or overloaded conditions with extremely long delays. LOS definitions for signalized and unsignalized intersections are described in Table 1. Per the San Mateo County Traffic Impact Study Guidelines, the minimum acceptable level of service (LOS) is C at intersections overall, with no individual movement operating below D.<sup>6</sup>

**Table 1: Level of Service Criteria for Intersections**

Level of Service	Description	Average Delay (seconds / vehicles)	
		Signalized Intersections	Unsignalized Intersections
A	Light or no delay	≤ 10.0	≤ 10.0
B	Short traffic delay	> 10.0 and ≤ 20.0	> 10.0 and ≤ 15.0
C	Average traffic delay	> 20.0 and ≤ 35.0	> 15.0 and ≤ 25.0
D	Long traffic delay	> 35.0 and ≤ 55.0	> 25.0 and ≤ 35.0
E	Very long traffic delay	> 55.0 and ≤ 80.0	> 35.0 and ≤ 50.0
F	Extreme traffic delay	> 80.0	> 50.0

The Carlos Street/Highway 1 intersection currently operates at LOS B in all three study periods—the weekday AM peak, the weekday PM peak, and Saturday midday periods. As shown in Table 2, project-generated trips are expected to degrade LOS from B to C in the weekday PM and Saturday midday periods. The intersection retains a B level of service in the weekday AM period.

<sup>5</sup> Highway Capacity Manual, Transportation Research Board (TRB), Washington, D.C., 2000

<sup>6</sup> On occasion, the County may consider LOS D acceptable in dense urban conditions.

**Table 2: Traffic Operations at Carlos Street/Highway 1**

Scenario	Weekday AM		Weekday PM		Saturday Midday	
	LOS	Delay	LOS	Delay	LOS	Delay
Existing Conditions	B	13.3	B	13.2	B	14.0
Existing Plus Project	B	14.4	C	15.5	C	15.9

From: [Karen deMoor](#)  
To: [Ananda\\_Renee@Coastal](mailto:Ananda_Renee@Coastal)  
Subject: Introduction to Resist Density  
Date: Wednesday, April 12, 2017 1:24:04 PM  
Attachments: [Resist Density - Introduction 4.3.17.pdf](#)

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Dear Renee,

I hope this email finds you well.

I am sending you as an attachment our recently-produced pamphlet, Introduction to Resist Density. It outlines our concerns regarding current development issues facing the San Mateo County Midcoast, and the negative cumulative impacts on traffic and road safety, the environment, accessibility, and the semi-rural character of this coastal region.

We hope that this will be useful information for you as you consider decisions affecting the coastside. Please let us know if you have any questions or comments on our presentation or if you'd like to meet in person to walk through our concerns.

Thank you for taking the time to review our work. We look forward to connecting with you in the future on these very important issues.

All my best,

Karen deMoor

PS - please let us know if you would like to receive a printed pamphlet by mail.

---

Karen deMoor  
Board Member | [Resist Density](#) | [www.ResistDensity.Org](http://www.ResistDensity.Org)  
*Sensible planning and protection for the San Mateo County Midcoast!*

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

December 13, 2016

San Mateo County Planning Department – Code Complaint  
455 County Center, 2nd Floor  
Redwood City, CA 94063  
Attn: Rita McLaughlin  
Code Complaint: [planning\\_codecomplaint@smcgov.org](mailto:planning_codecomplaint@smcgov.org)

*Re: habitat and tree removal on Parcel APN:037-022-070*

Dear Ms. McLaughlin,  
Thank you for taking the time to speak to me today.

As we discussed, I wanted to make a code complaint on behalf of Resist Density, representing hundreds of concerned residents. During the week of December 5, a significant amount of tree, shrub and habitat removal took place on the 11 acre parcel in Moss Beach (APN: 037-022-070), a wild parkland with historical significance. As you explained to me, there was no permit submitted for this work to be done.

We're concerned because this parcel is home to many species of plants and animals, endangered species (red-legged frog and San Francisco garter snake have been seen on site). Plus, it was a top-secret WWII artillery training camp so underground hazards may exist. The history and remains of the property are only just becoming known. Its close proximity to Montara Creek and the Fitzgerald Marine Reserve are of concern due to run-off that excavation and land clearing causes, particularly now with the Winter rains.

I am attaching photos taken on December 12, 2016 of the property that capture the boundaries delineating what was cleared vs what was left untouched. Also included are photos of the remains of WWII military building foundations exposed by the clearing.

Please let me know if I can provide any further information. I look forward to hearing from you.

In health,

Karen deMoor  
Board Member, Resist Density  
Cell: 650-996-9286  
[karen@resistdensity.org](mailto:karen@resistdensity.org)

CC:  
Renee Ananda, CA Coastal Commission: [renee.ananda@coastal.ca.gov](mailto:renee.ananda@coastal.ca.gov)



**From:** Ananda, Renee@Coastal  
**To:** ["Julia M. Brinckloe"](#)  
**Subject:** RE: MidPen Proposed Affordable Housing Moss Beach  
**Date:** Thursday, August 18, 2016 1:35:00 PM

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Hello Ms. Brinckloe,

We haven't received the copy of the Development Plan, yet. I have been in contact with the County staff and they are working on getting it to us. The County is responsible for the tree ordinance. It is probably best that you follow-up with them as to whether or not a permit has been issued to allow cutting the two trees. I will check with our Enforcement Unit, also. Do you have photos of the Seventh and Main location? Thank you, RTA

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**From:** Julia M. Brinckloe [mailto:jmbrinck@comcast.net]  
**Sent:** Thursday, August 18, 2016 1:29 PM  
**To:** Ananda, Renee@Coastal  
**Subject:** Re: MidPen Proposed Affordable Housing Moss Beach

Good afternoon, Renée,

MidPen is holding another Open House this afternoon at the Farrallone Elementary School in Montara. I plan to attend although it is painful for me, sensing from my last attendance that MidPen is selling, not listening. And could not care one bit about the longtime homeowners here on the Coastside.

You indicated that MidPen's proposed project is likely "not in conformity with the Development Plan" identified in your email below. Have you received any confirmation or updates from the County?

Can we stop this ill-conceived Coastal assault? Are we who "Resist Density" simply whistling in the wind, or CAN we realistically STOP this?

As to the tree issue in Montara...the two massive cypresses stand at the corner of Seventh and Main HALF CUT DOWN—in complete ruination. With chunks of tree littering the ground beneath. Who if anyone authorized it?

Regarding the tree across the street, I cling to hope it will be completely SPARED. It simply **cannot** be cut down. If you need more photos I would be happy to supply them.

Thank you, Renée. It's gratifying to know at least someone in authority is listening.

Julie Brinckloe  
Montara

On Aug 5, 2016, at 11:47 AM, Ananda, Renee@Coastal <[Renee.Ananda@coastal.ca.gov](mailto:Renee.Ananda@coastal.ca.gov)> wrote:

Hello Ms. Brincklow,

I have additional information upon following-up internally with our staff regarding the MidPen Affordable Housing proposal in Moss Beach. Although the geographic location of the proposed project site is within the County's permit jurisdiction it looks like MidPen's proposed project would require an amendment to the Local Coastal Program (LCP) because what they likely are pursuing, as far we know, is not in conformity with the Development Plan specified in the March 11, 1986 PUD-124 ordinance (No. 3089). I have requested a copy of the Development Plan from the County (which they are working on sending to me) and will update you on the status.

Thank you, RTA

*Renée T. Ananda, Coastal Program Analyst*  
*California Coastal Commission – North Central Coast District*  
*45 Fremont Street, Suite 2000*  
*San Francisco, CA 94105*  
*Phone – Direct: (415) 904-5292    Main: (415) 904-5260*  
[renee.ananda@coastal.ca.gov](mailto:renee.ananda@coastal.ca.gov)

**From:** [Julia M. Brinckloe](#)  
**To:** [Ananda, Renee@Coastal](mailto:Ananda.Renee@Coastal)  
**Subject:** Re: MidPen Proposed Affordable Housing Moss Beach  
**Date:** Friday, August 05, 2016 12:05:33 PM

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Thank you VERY much for following up on this, Renée.

I will look forward to any update you have, and appreciate your attention to an issue that is critical to the sanctity of our precious Coastside home.

Julie Brinckloe

On Aug 5, 2016, at 11:47 AM, Ananda, Renee@Coastal  
<[Renee.Ananda@coastal.ca.gov](mailto:Renee.Ananda@coastal.ca.gov)> wrote:

Hello Ms. Brincklow,

I have additional information upon following-up internally with our staff regarding the MidPen Affordable Housing proposal in Moss Beach. Although the geographic location of the proposed project site is within the County's permit jurisdiction it looks like MidPen's proposed project would require an amendment to the Local Coastal Program (LCP) because what they likely are pursuing, as far we know, is not in conformity with the Development Plan specified in the March 11, 1986 PUD-124 ordinance (No. 3089). I have requested a copy of the Development Plan from the County (which they are working on sending to me) and will update you on the status.

Thank you, RTA

*Renée T. Ananda, Coastal Program Analyst*  
*California Coastal Commission – North Central Coast District*  
*45 Fremont Street, Suite 2000*  
*San Francisco, CA 94105*  
*Phone – Direct: (415) 904-5292 Main: (415) 904-5260*  
[renee.ananda@coastal.ca.gov](mailto:renee.ananda@coastal.ca.gov)



From: [Julia M. Brinckloe](#)  
To: [Ananda, Renee@Coastal](mailto:Ananda.Renee@Coastal)  
Subject: Fwd: Regarding High Density Housing in Moss Beach  
Date: Friday, August 05, 2016 12:21:11 PM

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Ms. Ananda,

FYI this is an early email I sent to MidPen Housing--one of several I've written to them. None has been answered.

jb

Begin forwarded message:

**From:** "Julia M. Brinckloe" <[jmbrinck@comcast.net](mailto:jmbrinck@comcast.net)>  
**Subject:** **Regarding High Density Housing in Moss Beach**  
**Date:** March 20, 2016 at 2:06:26 PM PDT  
**To:** [DHorsley@smcgov.org](mailto:DHorsley@smcgov.org), [fauyeung@midpen-housing.org](mailto:fauyeung@midpen-housing.org)

Dear Supervisor Horsley and Mr. Felix AuYeung:

I am a longtime resident homeowner in Montara, inspired to write to you by a small plaque that hangs on my bedroom wall.

It hung in the various homes of my childhood and has served as a subliminal yet profound lesson for life.

It is probably familiar to you:

**God grant me the serenity**

**To accept the things I cannot change;**

**The courage to change the things I can,**

**And the wisdom to know the difference.**

When I learned that **MidPen Housing** is weighing an option to build high-density housing on eleven acres in Moss Beach, I tried to **accept** it. After all, I granted myself the privilege to live in this jewel of California we call the Coastsides. What right do I have to deny others that privilege?

But the home I purchased in 1996 was a small cottage, circa 1960. I replaced a family of five with a soliloquy of one. For years I've stepped lightly here, out of respect for the most nearly perfect place I've known in a lifetime.

We have the majesty of the ocean and tranquility of the beach. Our Montara Mountain is parkland, protected from the unsightly sprawl of surrounding areas. Our roads are narrow and our highway is still one-

lane coming; one-lane going. We pay higher taxes than most. We **accept** the cost of living here because we know what a rare gem it is.

But gems can be broken up. An exquisite emerald can be crushed into chips, its beauty forever lost. There is no undoing development. We can either respect and preserve the Coastside as the fragile mecca it is, or divide and destroy it—let the law of diminishing returns become the law of the land. Daly City was once a beautiful place; sprawling development diminished it.

So there is no **serenity** to **accept** MidPen's plan, but only **courage** to appeal for **change**. A significant increase in residents means more traffic along Highway 1, which has already increased dramatically since the advent of the Devil's Slide tunnel. Soon we will need more stoplights to accommodate ingress and egress, which means even slower traffic. And where does it end?

Then there's our water. We restrict our use in dry seasons. During the recent drought those restrictions cost us dearly; the landscape will take years to recover. Yet we honored them, out of respect for our limited water supply.

There are creative, productive ways to use eleven acres in Moss Beach. I'm no economist or marketing analyst, but if revenue is the goal then it must be weighed against the consequence of degrading the very place it markets *because* of the Coastside's intrinsic value.

This is our home; our duty to protect. **Wisdom** demands it. The law of diminishing returns is ready to rule if our **serenity** will **accept** it.

So I respectfully appeal to you who have authority to decide—to **change** the development plan with preservation of an emerald in mind.

Thank you.

Sincerely yours,

Julia M. Brinckloe  
Montara



**SIERRA  
CLUB**  
FOUNDED 1892

## ***Sierra Club Loma Prieta Chapter***

*Protecting the planet since 1933*

3921 East Bayshore Road, Suite 204, Palo Alto, CA 94303  
[loma.prieta.chapter@sierraclub.org](mailto:loma.prieta.chapter@sierraclub.org)

March 4, 2016

Felix AuYeung  
Director of Business Development  
MidPen Housing Corporation

Dear Mr. AuYeung,

The Sierra Club has long supported the mission of MidPen Housing and we have on many occasions been supportive of several of your eminently worthy individual projects. The Sustainable Land Use Committee's comments support land use efficient projects within a half mile of a transit hub and looks for restoration of ecological services outside.

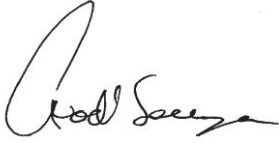
The Sierra Club is aware that your organization is serious about participating in a high density affordable housing project located in Moss Beach at 1 Sierra Street - the general description is 147 units on 11 acres. In response to concerns from Club members who live in the area we have visited the site and our initial impression is that there could hardly be a much worse location for affordable housing in the urbanized Mid-Coast.

The location inefficiency will add transportation as a cost burden on affordable need residents already struggling with the inadequacy of our wage regimes. It is equally remote in both directions from supermarkets, shopping, general services and medical practices. Food and service deserts are an inequitable cost and safety burden given the awful walkability score (a measure of land use efficiency).

The interface with Highway #1 is dangerous and very difficult to remedy. The lack of employment opportunities would also be inequitable. As to impacts, both the Level of Service (LOS) and the Vehicle Miles Travelled (VMT) calculations would be significant.

As matters stand it is difficult for us to conceive of mitigations that would realistically overcome these deficiencies and therefore we must sympathize with the concerns of the neighbors. We are taking this occasion to seriously inquire of MidPen if you are fully aware of these deficiencies and have some plan to overcome them. We look forward to your reply and discussing this issue with you.

Regards,

A handwritten signature in black ink, appearing to read 'Gladwyn d'Souza'. The signature is fluid and cursive, with a large initial 'G'.

Gladwyn d'Souza  
co-Chair, Sustainable Land Use Committee,  
Loma Prieta Chapter, Sierra Club  
<http://www.sierraclub.org/loma-prieta>  
650-804-8225

CC: James Eggers, Director  
Sierra Club, Loma Prieta Chapter  
Ken King, Coastal Issues Committee



List of Background Documents Submitted by Brian Gaffney, Resist Density, February 22, 2021\*:

- Farallon Vista Development Project Draft EIR, July 1985
- Endangered and Threatened Wildlife and Plants; Revised Designation of Critical Habitat for the California Red-Legged Frog, Fish and Wildlife Service, Federal Register, March 17, 2010
- Bay Area Evacuation Route Data, Streetlight Data, 2020
- CPUC High Fire-Threat District Map, San Mateo County
- Water Well Sampling and Well Destruction, Cypress Point Development, April 9, 2018
- Well Boring Location Maps, AEI Consultants, April 9, 2018
- Phase I-Environmental Site Assessment MidPen Housing, AEI Consultants, November 10, 2015
- Limited Phase II Subsurface Investigation MidPen Housing, AEI Consultants, February 15, 2016
- Additional Subsurface Investigation & Water Well Evaluation, AEI Consultants, February 20, 2018
- MidPen Bore Sites-Military Building Overlay
- Asbestos Abatement Report, Triad Environmental Systems, November 1, 1989
- Combined Cultural Resources Report Appendices A-E, June 1, 2018
- CGS Earthquake Zones Map Moss Beach, 2020
- CGS Earthquake Zones of Required Investigation, 2020
- CGS Earthquake Map Moss Beach, 2020
- Landslide Susceptibility Areas, Wilson and Keefer, 1985
- Cypress Point Hydromodification Management, Revision 2, BKF Engineers, May 2, 2018
- Cypress Point Project, Public Services and Utilities, Stevens Consulting, July 2018

- Sewer Authority Mid-Coastside, Sanitary Sewer Overflows, Midcoast ECO, February 13, 2021
- Cypress Point Project-Application Referral, Caltrans, August 29, 2018
- Video of Highway 1-San Carlos Blind curve:  
<https://www.youtube.com/watch?v=OaE9hdYPHZE&authuser=0>
- Cypress Point Preliminary Traffic Assessment, Alternatives for Carlos Street-Highway 1, Kittelson & Associates, August 7, 2017
- Projected Moss Beach Traffic Flow with Proposed MidPen Multi-Unit Housing, prepared by Resist Density, 2020
- Connect the Coastside Executive Summary Public Draft, January 15, 2020
- Connect the Coastside, Final Administrative Draft, Executive Summary, January, 2021
- Cypress Point, January 2018 Cypress Point Traffic Analysis Draft, Caltrans
- History and Environment of Farallon Heights, JQ Oeswein, January 21, 2020

\*documents too voluminous for online archival; on hardcopy file and available upon request via email to [erik.martinez@coastal.ca.gov](mailto:erik.martinez@coastal.ca.gov)